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Australian Hotels Association (Vic) Self-exclusion program

Background

The Victorian Gaming Self-exclusion program began operation in 1997. During the formulation process AHA (Vic) sought input from problem gambling counselling service providers (including Gamblers Help) to assist in the construction of a program that would be effective and accessible.

Gamblers Help advised the Association that a Self-exclusion program should be based on a model of change to address problematic addictive behaviour. The model of change developed by Prochaska, J. O. and DiClemente, C. C. (1986) was used as a basis for the development of the Victorian Self-exclusion program.

At this time AHA (Vic) was informed that to maximize the effectiveness of the program it should be based on “self”-exclusion rather than a “barring” of patrons model. That is, the commitment to take action on problem gambling should come from the individual when the individual is ready to take action.

The instrument used to facilitate entry to the program is a Deed of Self Exclusion. This document provides all relevant information and obligations to participants.

Consistent with the principles contained in the Model of Change, the system places the emphasis on self-empowerment. The individual commits to abstaining from entering a gaming area. It is not designed to allow the individual to make a decision that a venue will bar them from entry. However, venue staff provide assistance to self-excluded individuals to maintain their adherence to the program.

The Victorian gaming venue Self-exclusion program is centrally administered by the Australian Hotels Association (Victoria) with support from Tatts Group and Tabcorp.

Since the inception of the Self-exclusion program in 1997, to date there have been 5120 persons who have utilized the program. In recent years, on a monthly basis an average of 100 Deeds are executed.

1. Administration of a self-exclusion program

The Commission must ensure that a venue operator has a self-exclusion program that:

- (a) meets the requirements of the Act

(b) complies with this and any other relevant Ministerial direction

(c) is approved by the Commission

This application is submitted in accordance with Section 3.4.12A of the Gambling Regulation Act 2003 whereby it is a condition of a venue operator's licence that the venue operator conduct a Self-exclusion program that has been approved by the Commission.

It is intended that the approved Self-exclusion program continue to be provided by the industry and utilized by gaming venues in Victoria. AHA (Vic) will determine a fee payable by gaming venues seeking to subscribe to this Self-exclusion program. Upon the granting of approval for the industry template for Self-exclusion it is our intention that individual gaming venues will be advised to lodge notice with the VCGR of their desire to participate in the approved program.

2. Process for self-excluding

A self-exclusion program must establish a process for self-exclusion. It must specify:

- (a) the steps that a customer needs to take to voluntarily self-exclude
- (b) the steps a person must take to revoke a decision to self-exclude
- (c) the steps a person must take to vary the terms of a self-exclusion

(a) Self-exclusion process

Step 1. Contemplation of Self-exclusion

People become aware of and enlist to the Self-exclusion program in various ways, for example from problem gambling counsellors, medical practitioners, friends who are on the program, staff at gaming venues, website information, responsible gambling brochures available at venues, etc.

It is preferable for entry to the program to be recommended by a problem gambling counsellor on the basis that they are informed of self-empowerment principles consistent with participating in Self-exclusion.

For persons who approach a gaming venue seeking to undertake Self-exclusion they are advised by gaming staff to contact AHA (Vic) to make necessary arrangements. This contact can be made via:

- telephone 03 96543491 (24 hour, 7 day message service)
- email s.tissear@ahavic.com.au
- website www.ahavic.com.au
- mail PO Box 18067, 45 Collins Street East, Melbourne, Vic, 8003.

Step 2. Preparation for Self-Exclusion

Once the participant has made the decision that s/he is prepared to undertake Self-exclusion, the Self Exclusion Officer (S-E Officer) at AHA (Vic) provides relevant information about the program, including a sample Deed of Self-exclusion.

There is no requirement for the gaming venue to participate in the preparation of a person's Deed of Self-exclusion.

During the first contact the S-E Officer will ascertain whether or not the person is receiving counselling. If the person is not receiving counselling the S-E Officer will recommend contact with Gamblers' Help. Consent documentation is offered to the participant to allow Gamblers Help to initiate counselling services. The S-E Officer will then outline the process to the participant and will arrange a Self-exclusion interview.

Once the participant has made the decision that s/he is prepared to undertake Self-exclusion, the S-E Officer provides relevant information about the program, including a sample Deed of Self-exclusion.

Step 3. Self-Exclusion interview

The Self-exclusion interview is conducted by the S-E Officers at a time and a location aimed to best suit the prospective participant.

Gaming venues do not participate in or facilitate the process of a person signing a Deed of Self-exclusion as this aspect is managed by S-E Officers.

In the metropolitan area, most interviews are conducted at the AHA (Vic) offices located at Level 1, 1 Little Collins Street, Melbourne. In outer-suburban and regional areas the interview is most often conducted at the local Gamblers' Help office.

For persons residing in regional Victoria, the S-E Officer attends major regional centres on a regular "circuit". These areas include Colac, Geelong, Ballarat, Bendigo, Shepparton, Morwell and Sale. Necessary arrangements are also made by S-E Officers in outer regional areas to conduct the interview and facilitate required documentation.

Participants are advised by the S-E Officer that they can bring other persons along to the interview. On occasions the participant will request that a counsellor attend at the interview and on other instances the person is accompanied by a support person such as a friend or family member.

At the interview the S-E Officer explains the Self-exclusion process to the participant and carefully explains the contents of the Deed. At the end of the interview, if the person seeking Self-exclusion is prepared to proceed, the S-E Officer witnesses the execution of the Deed and photographs of front facial profile and side profile are obtained with the consent of the participant.

The Deed is not a contract between parties but rather an individual commitment. By signing the Deed of Self Exclusion the gambler does a number of things:

1. **Undertakes** not to enter the gaming room and not to play gaming machines at the venues that s/he has nominated.

2. **Authorises** the staff at the venue to stop him/her entering the gaming room and if necessary remove him/her from the gaming room. S/he also authorises the taking, dissemination and display of photographs and personal details.
3. **Releases** all other relevant persons from any legal liability in respect of the Self-exclusion, including assault, defamation, duty of care, and undertake not to sue in respect of the self exclusion.
4. **Indemnifies** all other relevant parties in respect of the Self-exclusion.
5. **Acknowledges** that s/he has entered the Deed voluntarily, and that the Deed is enforceable against him/her alone, that there is not legal duty on any other person except him/herself. S/he further acknowledges that s/he understands the contents of the deed.

At the interview, the S-E Officer discusses the effect of the Deed of Self-exclusion and emphasises the voluntary nature of the program. The participant is encouraged to ask questions during the interview in order to fully understand the effect of the Self-exclusion program.

During the interview the participant is advised that the Deed authorises the venue management to take any reasonable steps to enforce the undertaking not to enter the restricted gaming areas and not to play gaming machines at the nominated venues. The participant is also informed that staff at the venue will assist where possible and if detected in a gaming room s/he will be instructed to depart the area. By entering a Deed of Self-exclusion, a person does not commit to not entering non-gaming areas of a gaming venue.

After the S-E Officer has completed the explanation of the Deed and is satisfied that the participant understands the consequences of entering into it, as a final step of the interview the participant is asked to check that the appropriate venues are nominated, and to nominate the period of Self-exclusion (6 – 24 months).

Copies of their Deed are then distributed to the venues that have been nominated.

Step 4. Venue receives information about person entering Self-Exclusion

Upon receipt by a gaming venue of the photographs and details of a person entering a Deed of Self-exclusion relating to their particular venue, the venue gaming supervisor/manager is required to update venue records and maintain a full listing of persons Self-excluded from that particular venue.

The venue gaming supervisor/manager will ensure that photographs with participants' personal details and exclusion dates are placed on display at the 'back of house' to assist venue staff in monitoring customers to potentially detect those who may be Self-excluded. This information is stored in a private and secure area to which the public does not have access.

A centrally administered Self-exclusion computerized data base is maintained by AHA (Vic). Victorian gaming venues have access to the data base via an individual confidential security password. This web-based system allows individual gaming venues to only access information relating to persons who are Self-excluded from their respective venue. Information provided to venues includes names & address, date of birth, colour photographs (front and side profile), and dates deed expiry.

In the event that a gaming venue has a gaming-related customer loyalty program, the venue gaming supervisor/manager will review the listing of Self-excluded patrons to ensure that any such player loyalty database does not include persons participating in Self-exclusion.

(b) Revocation process

In the event that a person approaches a gaming venue requesting to have their Deed of Self-exclusion revoked, gaming venue staff direct the person to contact the AHA (Vic) Self Exclusion officers who process all revocation applications.

To revoke a Deed of Self-exclusion a person must first attend an interview with a problem gambling counsellor and obtain written acknowledgment of revocation counselling. The Self-excluded person must then attend a face-to-face meeting with a S-E Officer to sign the Revocation Deed, and produce a letter from the counsellor stating that s/he has discussed the early revocation of the Self-exclusion and sought guidance (including ramifications) on the revocation/variation of the Deed.

If a person revokes their Deed of Self-exclusion from a particular gaming venue S-E Officers advise the venue and their records are adjusted accordingly.

(c) Varying the terms of a Deed

The Self-excluded person has the option of varying the terms of the Deed.

In the event that a person approaches a gaming venue requesting to have their Deed of Self-exclusion varied, gaming venue staff direct the person to contact the S-E Officers who process all applications to vary a Deed of Self-exclusion.

If a Self-excluded person desires to vary the Deed by either adding additional gaming venues or reducing the term of Self-exclusion, the person must make arrangements for a meeting with a S-E Officer to facilitate the variation to the Deed by executing a subsequent Deed.

Other options to vary the terms of the Deed are accommodated on a needs basis.

If a person varies the terms of their Deed of Self-exclusion relating to a particular gaming venue, S-E Officers advise the management of the venue and their records are adjusted accordingly.

2.2 A self-exclusion program must be designed so that:

- (a) a customer considering self-exclusion is not deterred by unnecessary administrative requirements and complexities
- (b) there is capacity to assist a person who chooses to self-exclude to also self-exclude from gaming venues that have a different self-exclusion program

(a) Ease of administration

The Self-exclusion program is managed by AHA (Vic) on behalf of gaming venues. It is designed to facilitate ease of administration for those seeking Self-exclusion. The program administration aims for timely responses for intending participants and provides flexibility and understanding of various individual circumstances.

Gaming venues will receive advice and support to assist in ensuring Self-exclusion at the venue level. This will ensure that customers at venues considering Self-exclusion should not be deterred by unnecessary administrative requirements and complexities.

(b) Other Self-exclusion programs

In the event that a customer enquires at a gaming venue about Self-exclusion administered by another organization, venue staff are required to advise the customer to contact the AHA (Vic) Self-exclusion office for information and advice.

Upon request, relevant information will be provided by AHA (Vic) S-E Officers to assist persons seeking Self-exclusion from other providers eg Crown Casino, inter-State arrangements, etc. In the event that multiple gaming venue Self-exclusion programs may exist, relevant information will be provided where available to assist a person who chooses to Self-exclude to also Self-exclude from gaming venues that may have a different Self-exclusion program.

3. Duration of self-exclusion

The self-exclusion program must identify:

- (a) how long a customer's decision to self-exclude will last
- (b) how that period can be extended or revoked

Gaming venues do not have a direct role in extending, revocations or determining the term of Self-exclusion. Venues receiving enquiries from customers about these matters are required to direct the enquiry to the AHA (Vic) Self-exclusion office for processing.

(a) Duration of Self-exclusion

The gaming venue Self-exclusion program is currently offered for a minimum of six months and a maximum of 24 months. There is no automatic revocation of a Deed of Self-exclusion if a person fails to undertake problem gambling counselling.

(b) Revocation or extension of Self-exclusion

To revoke a Deed of Self-exclusion a person must first attend an interview with a problem gambling counsellor and obtain written acknowledgment of revocation counselling. The Self-excluded person must then attend a face-to-face meeting with a Self-exclusion Officer to sign the Revocation Deed, and produce a letter from the counsellor stating that s/he has discussed the early revocation of the Self-exclusion and sought guidance (including ramifications) on the revocation/variation of the Deed.

One month prior to the expiry date specified in the Deed, the Self-excluded person will receive a letter from the Self-exclusion officers advising that their term of Self-exclusion will expire at a date previously agreed to. Information will be provided regarding the process to extend/renew their Deed of Self-exclusion which will be in accordance with the initial application process. If the person does not respond to this letter, then the person is considered as having completed their period of Self-exclusion.

The provision of information to customers

A self-exclusion program must detail:

- a. how the venue operator will ensure that customers are made aware of the availability of a self-exclusion program
- b. how information about a self-exclusion program will be made available to customers

(a & b) Information on Self-exclusion

Persons (customers) will be able to access information which allows them to be aware of the availability of Self-exclusion. This can be done via relevant brochures on Self-exclusion provided by gaming venues. An updated information brochure is currently under construction.

Each gaming venue shall nominate a Responsible Gambling Officer. This Officer shall ensure that a staff member is available (whenever gaming occurs) to provide customers with information about Self-exclusion.

Other relevant information is also available at various Gamblers Help agencies.

Various websites including those provided by gaming industry participants and Gamblers Help agencies also provide relevant information regarding Self-exclusion.

www.ahavic.com.au

Persons signatory to a Deed of Self-exclusion are provided with a copy of their respective Deed which contains information relating to venues they are Self-excluded from and the term of the Deed.

4. Identification of a self-excluded person in the gaming machine area

5.1 A self-exclusion program must:

- (a) require the venue operator to take reasonable steps to ensure that a self-excluded person does not enter that gaming machine area of the venue
- (b) detail the procedure that will be adopted to detect self-excluded persons who enter the gaming machine area of the venue
- (c) detail the procedure that will be adopted when a self-excluded person is detected in the gaming machine area.

5.2 Any procedure for detecting self-excluded persons specified in a self-exclusion program must have due regard for the privacy and dignity of the self-excluded person.

5.1 (a) Reasonable steps to prevent entry

Venue staff are required to maintain a working knowledge of persons who are Self-excluded from the gaming room in order to actively monitor the gaming area and be vigilant for the detection of possible breaches.

The Self-exclusion officers provide information by mail to gaming venues relating to persons who are Self-excluded and by secure web-based access.

Upon receipt of the mailed photographs and details of a person entering a Deed of Self-exclusion relating to a particular gaming venue, the venue's gaming supervisor/manager is required to update venue records and maintain a full listing of persons Self-excluded from that particular venue.

Venue management will arrange for photographs of Self-excluded persons to be placed on display for staff only at discreet areas and maintained at designated office areas to assist venue staff to detect possible breaches. Venue management will ensure that this information is stored in a private and secure area to which the public does not have access.

5.1 (b) Detection process

In the event that there is a possible breach by a person participating in Self-exclusion, venue management will ensure discreet investigation and action by venue staff. This is done by venue staff checking the person's appearance against photographs of persons Self-excluded at the venue.

Where possible, staff will seek input from other staff (ie. a second opinion) when making the determination of whether a particular person is breaching their Deed of Self-exclusion.

A centrally administered Self-exclusion computerized data base is maintained by AHA (Vic). All Victorian gaming venues have access to the data base via an individual confidential security password. This web-based system allows individual gaming venues to access information relating to persons who are Self-excluded from their respective venue. Information provided to venues includes names & address, date of birth, colour photographs and expiry date of their Deed of Self-exclusion. Venue management also has the ability via this system to view Self-exclusion participants and report breaches to the Self-exclusion administrators at AHA (Vic) either by telephone and/or designated email via the venue's dedicated web-link.

Gaming venue staff shall use best endeavors to maintain a person's privacy and dignity of any Self-excluded person by acting in a manner which does not compromise this objective.

5.1 (c) Intervention of detected Self-excluded patron

Upon the positive detection of a Self-excluded person in the gaming area, discrete intervention will be carried out by venue management or designated staff who will take reasonable steps to remove the person from the gaming area.

By way of example, initial contact with the person breaching their Deed of Self-exclusion can occur via the following methods:

- The person suspected of Self-exclusion breach can be called to the reception desk over the venue's public address system;

- A staff member may discreetly approach the person in the course of “hospitality engagement” (eg provision of food or beverage) and ask their name, and
- Other engagement techniques may involve discrete approaches while the person may move about in the venue.

Management then encourages the person to a discreet area away from other customers and explains to the person that they have previously undertaken not to enter the respective gaming area as part of their Self-exclusion. Venue management may provide information to the person regarding Gamblers Help support services and other assistance as required.

All breaches of Self-exclusion are recorded in the venue’s responsible gambling register. A recording of a breach will include, person’s name, date and time of breach, action taken and by whom.

Venue management will monitor its listing of self excluded patrons to check against the venue’s player loyalty database (if such a facility exists) and access to this facility is removed as necessary.

In the event that a person has breached their Deed of Self-exclusion on multiple occasions, the person will be encouraged by AHA (Vic) Self Exclusion Office to seek problem gambling counselling. Gamblers Help may initiate this contact if they have previously gained the person’s consent to follow counselling services.

5.2 Privacy

Gaming venues will use best endeavors to maintain the privacy and dignity of Self-excluded persons.

5. Staff Training

A self-exclusion program must detail training that will be provided to gaming staff to enable them to:

- (a) help customers seeking information about self-exclusion or wishing to self-exclude
- (b) identify self-excluded persons
- (c) understand how to appropriately manage persons who have self-excluded

Gaming venues will obtain relevant training information from AHA (Vic) which will equip gaming staff with knowledge to help customers seeking information about Self-exclusion, identification of Self-excluded persons and how to appropriately manage persons who have Self-excluded.

AHA (Vic) will provide advice to gaming venues on how to maintain records for persons who are Self-excluded from their gaming venue, be aware of potential for breaches and to record actual breaches by persons undertaking Self-exclusion.

All staff employed in gaming areas are required to undertake a VCGR approved training course in responsible service which is endorsed by AHA (Vic).

As part of the responsible service training, gaming venue staff will be equipped with knowledge which enables them to monitor and detect persons who may attempt to breach their Deed of Self-exclusion. An emphasis will be placed on maintaining discretion, privacy and sensitivity when managing issues relating to breaches and the administration of Self-exclusion.

Information Bulletins are provided to gaming venues by AHA (Vic) on a timely basis regarding staff training and other necessary matters.

7. Availability of support services

7.1 A self-exclusion program must require a venue operator, or a person who manages a self-exclusion program on the venue operator's behalf, to maintain regular contact with problem gambling support services and to develop agreed protocols in order to facilitate:

- (a) referral of customers to problem gambling support services
- (b) the enhancement of the venue operator's self-exclusion program

7.2 A self-exclusion program must detail how regular contact will occur.

On behalf of gaming venues, AHA (Vic) Self-exclusion Office will maintain existing regular contact with problem gambling support services and continue to provide agreed protocols to gaming venues for the referral of customers to problem gambling support services and advice. This protocol will enhance a venue operator's Self-exclusion program.

In particular, AHA (Vic) as the manager of the Self-exclusion program on behalf of participating gaming venues will continue to maintain a close working relationship with Gamblers Help and problem gambling support agencies who wish to participate with the objective to identify opportunities to enhance the program. On behalf of participating gaming venues these support agencies will be invited to provide feedback on the operation of the program to enhance the effectiveness of the program. As such it is intended to establish a contact group within the problem gambling support agencies to facilitate this ongoing engagement.

An example of AHA (Vic) Self-exclusion Office's working relationship with problem gambling support agencies is the operation of a Self-exclusion partnership with the Salvation Army and Gamblers Help which is funded by the Victorian Government. The partnership project allows for additional staff to assist in providing timely counselling services for persons enlisting in the Self-exclusion program. This initiative demonstrates the implementation of a protocol which provides direct referral of persons undertaking Self-exclusion to gambling support services, and enhances and facilitation of the enhancement of the venue operator's participation in the Self-exclusion program.

This program allows Gambler's Help officers to have an initial role at Self-exclusion interviews and by providing a link to ongoing local counselling services. It has been recognised that some people seeking Self-exclusion often do so without involvement from Gamblers Help and counselling support agencies and it would be advantageous to develop this support link. The Victorian Government has committed funding for the ongoing counselling service.

The project was developed with input from AHA (Vic), Tatts Group, Tabcorp and Gamblers Help with support from members of the Responsible Gambling Ministerial Advisory Council’s Pathways to Recovery Working Group administered by the Department of Justice.

As part of this initiative, a Self-exclusion program reference group has been formed to oversee the management of partnership program.

It should be noted that persons undertaking Self-exclusion commit to ongoing counselling services as a condition of signing the Deed however, non participation does not render the Deed being null or void.

8. Data management

8.1 A self-exclusion program must require the venue operator, or a person who manages a self-exclusion program on the venue operator’s behalf, to keep a record of:

- (a) the number of person who have self-excluded
- (b) the number of self-excluded persons detected on the gaming machine area of the venue (including data on repeated breaches)
- (c) the number of self-excluded persons who extend or revoke their self-exclusion

8.2 A self-exclusion program must specify how this information will be collected, retained and provided to the Commission.

8.3 Data relating to self-exclusion must be collected and maintained in a manner that:

- (a) enables the Commission to monitor compliance by the relevant person with the self-exclusion program
- (b) respects the privacy of persons who have self-excluded

8.1 Record keeping

On behalf of gaming venues, AHA (Vic) Self-exclusion Office shall maintain all necessary data relating to the operation of the program. This information will be retained on the AHA (Vic) Self-exclusion computer database and hard copy.

In accordance with requirements of the Ministerial Direction, the data to be maintained includes venue-by-venue Self-exclusion statistics on:

- the number of person who have self-excluded
- the number of self-excluded persons detected on the gaming machine area of the venue (including data on repeated breaches)

- the number of self-excluded persons who extend or revoke their self-exclusion.

8.2 Information supplied to VCGR

Information relating to item 8.1 can be supplied to the Victorian Commission for Gambling Regulation to enable it to carry out its statutory duties. This information can be supplied by the AHA (Vic) Self-exclusion Office on a regular basis. (eg monthly)

8.3 (a) VCGR compliance monitoring

The AHA (Vic) Self-exclusion office will maintain relevant data which will be accessible to the VCGR to assist in the monitoring of compliance.

8.3 (b) Privacy

Relevant information relating to participants is obtained by consent and is maintained on a strictly confidential basis in accordance with privacy principles.

9. Reviewing the effectiveness of the self-exclusion program

A self-exclusion program must set out a process by which the venue operator will assess the operation and effectiveness of the program and must specify:

- (a) how often the self-exclusion program will be reviewed
- (b) the criteria that will be used to assess the effectiveness of the self-exclusion program
- (c) how customers who have self-excluded and problem gambling support services will have input into the review process
- (d) who will be provided with a copy of the review findings.

The AHA (Vic) Self-exclusion Office will co-ordinate the review of the effectiveness of a venue's Self-exclusion office on behalf of individual gaming venues.

(a) Annual review

Gaming venue operators will undertake an annual review of their Self-exclusion program administration in accordance with criteria used for the review. AHA (Vic) Self-exclusion office will oversee this process for venues.

(b) Review criteria

Facilitated by AHA (Vic) Self-exclusion office, the review will assess the effectiveness of the individual venue's Self-exclusion program by:

- Seeking feedback and input from Gambler's Help regarding the operation of the program
- Seeking input from venue staff and customers

- Reconciling venue data against the central administration of the program to ensure accurateness of record keeping (data management)
- Seeking information from persons on the program (this aspect will be conducted by AHA (Vic) Self-exclusion office)
- Assessing the utilization of the web-based data facility administered by AHA (Vic) Self-exclusion office

(c) Input from problem gambling support services and customers

On behalf of gaming venues, AHA (Vic) Self-exclusion office will seek input from Gambler’s Help regarding the operation of Self-exclusion.

AHA (Vic) Self-exclusion office will prepare customer surveys and distribute to gaming venues which will allow customers to provide input as to the effectiveness of the program.

Input from Gambler’s Help and customers will be included in the preparation of a gaming venue’s annual review.

(d) Review Findings

A copy of each venue’s review findings will be provided to the VCGR and AHA (Vic) Self-exclusion office by gaming venues.

10. Complaints process

10.1 A self-exclusion program must specify a process for resolving complaints from customers about the operation of the self-exclusion program.

10.2 The complaints process must:

- (a) specify how a complaint can be made
- (b) specify how information about complaints will be collected and retained
- (c) enable the Commission to monitor compliance with the complaints process.

10.1&2 Process for resolving complaints

On behalf of gaming venues, AHA (Vic) Self-exclusion office will administer a process for resolving complaints.

A customer can lodge a complaint regarding Self-exclusion by:

- Contacting the gaming venue supervisor/manager of the gaming venue concerned in person or in writing, and / or
- Visiting in person, writing or by telephoning the Manager of the Self Exclusion

Administration Office :

PO Box 18067, 111 Bourke St, Melbourne, 8003 telephone 03 9654 3491.

Gaming venue management will be able to assist individuals in lodging complaints when requested.

Complaints lodged with the gaming venue and/or Self-exclusion office will be investigated within 14 days and the outcome of the investigation will be conveyed to the complainant by gaming venue and/or Self-exclusion Administration Office. Complaints will be assessed with regard to content of the Deed of Self-exclusion.

Complaints will be investigated sensitively and in a confidential and respectful manner.

A register of complaints will be maintained by the Self Exclusion Administration Office and the gaming venue's responsible gaming register in a private and confidential manner.

Gaming venues may seek advice about the handling of complaints from AHA (Vic) Self-Exclusion office.

The complaints process will enable the VCGR to monitor compliance with complaints process as outcomes from investigations will be provided in a venue's annual review of effectiveness.