



RAISING THE STANDARD IN CUSTOMER CARE

**AUSTRALASIAN GAMING COUNCIL STRATEGY FOR
RESPONSIBLE GAMBLING
2019 - 2023**

INTRODUCTION

The Australasian Gaming Council (“AGC”) is a member body of the gambling industries in Australasia dedicated to promoting responsible gambling and furthering a sustainable gambling industry.

AGC members include Aristocrat Technologies Ltd, the Australian Leisure and Hospitality (ALH) Group, The Australian Hotels Association (AHA - National and State/Territory Branches), Crown Resorts Limited, The Star Entertainment Group Limited, The Gaming Technologies Association (GTA) and Tabcorp Holdings Limited.

AGC members believe that informed customers, targeted responsible gambling policies and adherence to ethical conduct, a focus upon continuous improvement in customer care and referral to treatment are essential elements that, together, will help industry providers to reduce gambling related problems and minimise associated harms in the community.

This iteration of the AGC Strategy for Responsible Gambling has been developed in consultation with AGC members and reflects compliance with existing responsible gambling regulatory frameworks while allowing scope for further innovation.

Rather than prescribe all practices in detail (several which are already encompassed in legislative instruments or codified provisions), this Strategy outlines key areas for industry focus. It has a goal of elevating the overall industry standard and advancing an industry culture that has a focus on the wellbeing of customers at its core.

AGC members undertake to operationalise the Strategy with regard to the diverse nature of their businesses and the regulatory frameworks applicable to the jurisdiction(s) in which they operate.

The Strategy will be revised and updated on an ongoing basis in consultation with the AGC’s Responsible Gambling Executive Committee.

STRATEGY OBJECTIVES

The objectives of this strategy are to:

- 1) Elevate the standard of available customer information provided by AGC members to assist in preventing the development of problems and/or adverse consequences related to gambling activity;

and

- 2) Advance the provision of supportive responsible gambling environments and practices by furthering a culture of responsibility and first-class customer care.

PRINCIPLES UNDERPINNING THE STRATEGY

This strategy recognises that while the responsible provision of legal, regulated gambling opportunities for adult participation provides recreational, social and economic benefits, a proportion of customers who gamble may be vulnerable to problems and significant harms associated with their gambling.

Problem gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.ⁱ

Responsible gambling means both responsible provision of gambling, which requires governments and industry to ensure gamblers can participate in gambling safely, and responsible consumption of gambling by customers.ⁱⁱ

Responsible gambling requires the provision of safe and supportive environments for the delivery of gambling products and services where:

- customers are enabled to make informed decisions about their gambling participation and activity;
- the potential for problems and significant harms that may be associated with gambling are minimised; and
- those adversely impacted by gambling have access to timely and appropriate information and assistance.

This AGC Strategy for Responsible Gambling explicitly endorses:

1. A Shared Approach to the Delivery of Responsible Gambling

The AGC supports an approach where responsible gambling occurs through the shared actions and ownership of governments, the industry, individuals and the community.

2. Compliance with All Laws

The AGC endorses full and strict compliance with all Federal, State and Territory Laws.

3. Multi-faceted Responsible Gambling Programs and Strategies

Research suggests that the cause(s) of problems experienced with gambling may be multi-factorial and are not uniform in their expression or experience. The AGC supports a multi-faceted, multi-stakeholder response.

4. Evidence-led Responsible Gambling Measures

The AGC believes that responsible gambling programs and initiatives should be evidence-led with consideration given to the potential for unintended consequences and industry sustainability.

5. Customer Sovereignty

The AGC supports the provision of responsible gambling measures and tools for voluntary use that respect customer sovereignty and privacy.

AGC LEADERSHIP AND RESPONSIBLE GAMBLING

AGC Members are committed to demonstrating leadership in responsible gambling, including by:

- Providing clearly defined statements, strategies and policies outlining their organisation's approach to responsible gambling that are integrated into all business areas and activities and regularly communicated to staff.
- Ensuring appropriate governance of responsible gambling matters, including adequate supports in place for staff dealing directly with customers.
- Supporting ongoing development and innovation in responsible gambling approaches and programs as research develops and as knowledge and practices evolve.

Building upon this leadership commitment, this iteration of the AGC Strategy outlines three key areas of focus for raising standards in the responsible provision of gaming and wagering:

1) Advancing informed choice;

2) Improving the support available to customers and staff;

and

3) Increasing and improving the help options available to customers.

KEY STRATEGY ELEMENTS

1) Advancing Informed Choice

- Provide better information to customers in a variety of mediums to support informed choice and promote healthy gambling attitudes, beliefs and behaviours.
- Work collaboratively with relevant stakeholders to increase the availability of responsible gambling resources and messaging in the broader community.

2) Improving Support to Customers and Staff

- Provide clear policies, procedures and programs that support responsible gambling outcomes.
- Promote appropriate, evidence-led customer education materials and tools that support healthy decision making about gambling and aid customer control.
- Ensure that new products and services are offered in a manner consistent with responsible gambling standards and policies.
- Support broad-based role-appropriate training and provide tools to assist staff in improving the identification of, and responses to, observable behaviours that present as at risk or problem gambling.
- Encourage and support staff responsible gambling interactions with customers.
- Promote healthy working environments and champion support and self-care for staff.

3) Increasing and Improving Help Options Available to Customers

- Provide and promote self-help options for customers.
- Maintain contact and working relationships with local treatment and support services to provide a range of quality referrals to customers seeking support.
- Provide Self-Exclusion/Barring programs that adhere to best practice principles.
- Investigate ways to further enhance Self-Exclusion/Barring programs in place - including by increased promotion and by enhancing systems, processes and actions relevant to breach.

ADVANCING INFORMED CHOICE

AGC members commit to

- **Providing better information to customers in a variety of mediums to support informed choice and promote healthy gambling behaviours.**
- **Working collaboratively with stakeholders to increase the availability of responsible gambling resources and messaging in the broader community.**

Promoting Informed Choices and Healthy Values, Attitudes and Beliefs

Experts have suggested four primary measures that may assist optimal decision making in gambling are:

- (a) the provision of relevant and objective information;
- (b) information that communicates the benefits of responsible gambling as well as the potential social and personal costs of excessive gambling;
- (c) materials targeted to specific gambling subgroups; and
- (d) the use of a variety of communication mediums to disseminate materials.ⁱⁱⁱ

Customer information materials currently required throughout Australasia include the provision of information about:

- gambling related complaints and financial transactions procedures;
- games, rules, odds and probabilities;
- industry host/provider responsible gambling policies and programs;
- the risks associated with gambling and how to seek help;
- exclusion program availability; and
- gambling help and assistance services.

AGC members believe that responsible gambling messaging should seek to influence healthy customer values, attitudes, beliefs and consumption behaviours

For example, information resources should be designed to:

- promote customer understanding that gambling is not a strategy for financial betterment but should rather be motivated by pleasure, entertainment and fun;
- encourage customers to place their gambling activity in balance with other leisure activities, responsibilities and priorities;
- support customers to plan their gambling participation within affordable limits and control their gambling through setting and sticking to appropriate personal limits (including using limit-setting tools and technologies where available) for time and expenditure on gambling activities;

- increase customer knowledge of behaviours and/or erroneous beliefs that may contribute to an experience of gambling related problems or adverse consequences associated with gambling in order to assist with self-identification; and
- encourage customer understanding that accessing further information about responsible gambling information, tools and assistance and/or professional help and treatment is actively supported, freely available and can be facilitated by staff at any time. ^{iv}

The AGC and its members are committed to providing accessible information to customers in a variety of mediums to support informed choice and promote healthy gambling attitudes, beliefs and behaviours

Getting the Message Out to the Community

Throughout Australasia governments, communities and industry have a history of working together to provide information resources to the broader community as a preventative measure.

AGC members will continue to work collaboratively with stakeholders to ensure that increased responsible gambling resources and messaging are available to the broader community.

IMPROVING SUPPORT TO CUSTOMERS AND STAFF

AGC members commit to:

- **Providing clear policies, procedures and programs that support responsible gambling outcomes.**
- **Promoting appropriate, evidence-led customer education materials and tools that support healthy decision making about gambling and aid customer control.**
- **Ensuring that new products and services are offered in a manner consistent with responsible gambling standards and policies.**
- **Support for broad based role appropriate training and the provision of tools to assist staff in improving the identification of, and responses to, observable behaviours that present as at risk or problem gambling.**
- **Encouraging and supporting staff responsible gambling interactions with customers.**
- **Promoting healthy working environments and championing support and self-care for staff.**

Placing Responsible Gambling at the Heart of the Business

In addition to all strict compliance with all legislative requirements AGC members are committed to:

- **Fostering a culture that encourages and supports continuous learning and improvement in the service of responsible gambling and customer support initiatives.**
- **Effectively implementing appropriate, evidence-led policies, procedures and programs that support responsible gambling outcomes including:**
 - policies with clear accountabilities,
 - reporting mechanisms and follow up procedures for dealing with responsible gambling matters;
 - the provision and promotion of appropriate, evidence-led and accessible customer tools that support healthy decision making and aid customer control; and
 - clear policies regarding advertising and marketing (including via loyalty programs)
- **Ensuring that new products and services are offered in a manner consistent with responsible gambling standards and policies.**

Focussing on Responsible Gambling Staff Training and Customer Interactions

Research in Australasia has sought to identify observable behaviours that may indicate at risk or problem gambling.^v

AGC members support staff training for both land-based and online gambling businesses that provides competencies, knowledge and skills in the following areas:

- The requirements of relevant state legislation, regulation, industry codes of practice/conduct and provider policies.
- Understanding and awareness of indicators/observable behavioural signs and the actions to be taken when such observations are made.
- Ability to respond appropriately and communicate information effectively to customers regarding:
 - the range of responsible gambling information resources, services, programs and supports in place at the venue or online;
 - the availability of self-exclusion, an understanding of the program in place and the process/appropriate contact details for customers seeking to access self-exclusion; and
 - the availability of counselling services and other supports and how to access such services/supports.
- Ability to deal appropriately with incidents or situations that may be related to responsible gambling matters including:
 - Disputes and complaints;
 - Unacceptable behaviours; and
 - Concerns expressed by families and friends

AGC members support:

- Broad based role appropriate training and providing tools to assist staff in improving the identification of, and responses to, observable behaviours that present as at risk or problem gambling; and
- Fostering open and supportive environments that encourage staff to feel comfortable in interacting with, assisting or referring customers appropriately.

Reinforcing Employee Wellbeing

AGC members acknowledge that staff and/or their significant others may experience gambling related concerns, may require additional support in assisting customers and/or may benefit from support in dealing with other workplace issues or concerns.

AGC members are committed to supporting and advancing employee wellbeing through appropriate information and training, the provision of employee assistance programs and the implementation of wellbeing initiatives that foster healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

INCREASING AND IMPROVING HELP OPTIONS AVAILABLE TO CUSTOMERS

AGC members commit to:

- **Providing and promoting self-help options for customers.**
- **Improving contact and working relationships with local treatment and support services to provide a range of quality referrals to customers seeking support.**
- **Providing Self-Exclusion/Barring programs that adhere to best practice principles**
- **Investigating ways to further enhance Self-Exclusion/Barring programs in place - including by increased promotion and by enhancing systems, processes and actions relevant to breach.**

Providing Self-Help Information

Australian research has identified self-help as the most widely used type of help amongst gamblers.^{vi}

Self-directed interventions can range from purely self-directed strategies involving no professional guidance to treatments involving minimal support from a health care professional.^{vii}

AGC members support promoting self-help strategies, tips and tools and providing information about appropriately evaluated self-directed help programs to expand available options and reach or appeal to customers who may otherwise not wish to access treatment or other support services.^{viii}

Improving Referrals to Treatment and Support Services

Information and contact material for treatment providers (including national hotline and online help/assistance services) is made available to people seeking information or assistance as well as to those seeking self-exclusion.

AGC members support the provision of accessible information regarding gambling help services, culturally and linguistically diverse (CALD) services and financial counselling assistance services in both print and digital formats.

AGC members will work to improve contact and working relationships with local treatment and support services to provide a range of quality referrals to customers seeking support.

Enhancing Self-Exclusion

AGC members actively support self-exclusion (also known as “barring” in South Australia) as a valuable and important program for customers experiencing difficulties with gambling.

AGC members support system(s) of self-exclusion that encompass the following principles and practices:

- Understanding and availability of the program in place is widely promoted through customer and public awareness efforts.
- The design of the program in place reduces potential barriers to access and actively facilitates referrals to further education and treatment.
- Self-exclusion programs are underpinned by comprehensive written procedures, policies, training and appropriate infrastructure.
- Information provided to customers includes:
 - clear information regarding the exclusion length(s) and choices available,
 - renewals process (where applicable),
 - obligations/conditions pertaining to the exclusion,
 - actions occurring in the event of any breach of the exclusion,
 - The benefits of seeking further education and professional treatment/support, and
 - the process for cessation/revocation of the exclusion.
- Self-excluded customers are excluded from loyalty programs, marketing and mailing lists.
- Self-exclusion processes and tools are evidence led, with appropriate data collection to support the exclusion.
- While acknowledging that to be effective, self-exclusion also requires an individual commitment, breach of a self-exclusion agreement should be understood as relapse, with steps taken to provide further information and assistance to the customer.
- Requests to exclude an individual, if originating with a third party (such as a family member), are supported by appropriate formal policies and processes that respect the privacy and well-being of both the customer and significant others.

Members of the AGC facilitating self-exclusion will offer systems and programs that adhere to best practice principles as determined in consultation with all other relevant stakeholders and with regard for applicable legislative/regulatory requirements.

AGC members will also investigate ways to further enhance self-exclusion programs in place – including by increased promotion and by enhancing systems, processes and actions relevant to the identification and management of individuals in breach of a self-exclusion agreement.

ACTIONING THE STRATEGY

AGC members come from various sectors of the Australasian industry and there is significant diversity in the size and scope of the gambling businesses they (or their members) operate.

This strategy represents key areas of focus that members seek to address on a voluntary basis via their own responsible gambling strategies and business/association activities.

The AGC will report on an annual basis regarding member activities undertaken towards this strategy.

REFERENCES

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ⁱⁱⁱ Blaszczynski, A., Ladouceur, R., Nower, L. and Shaffer, H. (2008) Informed Choice and Gambling: Principles for Consumer Protection, *Journal of Gambling Business and Economics* 2008 2, 103-11

^{iv} See Hing, N., Russell, A and Hronis, A. (2016) *Behavioural Indicators of Responsible Gambling Consumption*, Victorian Responsible Gambling Foundation which provides a list of principles and behaviours underpinning responsible gambling consumption.

^v Thomas, A., Delfabbro, P. and Armstrong, A. (2014) *Validation Study of In-venue Problem Gambler Indicators*, Gambling Research Australia.

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^{vii} Dowling, N., Merkouris, S., Rodda, S., Smith, D., Lavis, T., Lubman, D., Austin, D., Harvey, P., Cunningham, J. and Battersby, M. (2018) *Development and evaluation of an online gambling self-directed program: effective integration into existing services*, Victorian Responsible Gambling Foundation.

^{viii} Ibid