



**Submission to the Joint Select Committee on
Gambling Reform: Inquiry into the
Prevention and Treatment of Problem
Gambling**

The Australasian Gaming Council

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The Australasian Gaming Council

The Australasian Gaming Council (AGC) is a national industry association established in June 2000.

The AGC supports a sustainable gambling industry, while promoting gambling information, education and responsible gambling.

Within a public policy framework the AGC:

- promotes responsible gambling and high quality gambling research;
- develops and distributes gambling education resources;
- participates in and leads public policy forums and events about gambling;
- maintains an extensive gambling research eLibrary and industry statistical database; and
- provides first class services for members including issues papers, newsletters, research comment and the AGC website.

The AGC has broad coverage of the industry in Australia. AGC members are the Australian Hotels Association, The Gaming Technologies Association, The Australasian Casino Association and the Australian Leisure and Hospitality Group.

To read more about the AGC or to access the AGC's public e-Library of gambling research articles please visit us at www.austgamingcouncil.org.au

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Introduction

The Australasian Gaming Council (AGC) is pleased to provide a submission to the Joint Select Committee on Gambling Reform as part of this inquiry into the prevention and treatment of problem gambling.

The AGC believes that addressing problem gambling is best achieved as a shared responsibility that benefits from consultative processes and broad ranging discussion.

It is an ongoing and complex task in which all stakeholders – governments, academia, the community, the industry and gamblers themselves - have a role to play.

Under the auspices of Australian state and territory governments, who have considerable expertise in this area, numerous problem gambling prevention and treatment initiatives have been implemented over past decades.

Ongoing work by governments, industry and the support sector have led to tangible results in an increasingly educated and informed community, an emphasis on the provision of responsible service of gambling and a reduction in problem gambling prevalence.

The AGC notes that while much of the debate in Australia has focussed on Electronic Gaming Machines (EGMs) – and indeed most of our commentary here references the EGM gambling sector - the objective of furthering responsible gambling practices as well as the need for a collaborative focus on the effective prevention and treatment of problem gambling should not be viewed through the prism of EGM gambling alone.

There is also a need to remain cognisant that while the focus of this submission is on tackling problem gambling, for the majority, gambling comprises an enjoyable recreational activity that is undertaken responsibly and promotes outcomes which include a range of economic benefits to Australia and Australians.

This submission is limited to a brief discussion of matters listed as terms of reference for the current inquiry and includes comment upon:

- the provision of information and education as measures to prevent the development of problem gambling;
- the broad prohibitions and restrictions upon current marketing strategies and promotional activities;
- staff training as a measure to promote responsible gambling environments and offer further assistance to consumers;
- self-exclusion programs and their use as a mechanism to assist those experiencing problems with gambling;
- the need to increase public knowledge of and access to counselling as well as the need for further problem gambling treatment options; and
- industry support for national coordination of the gambling research agenda through a dedicated national research centre.

Ultimately, the AGC believes that well informed consumers, continued improvement in customer care, targeted responsible gambling policies and practices, effective treatment services and quality research guidance are the essential ingredients in any attempt to further prevent, reduce and treat gambling-related problems within the Australian community.

Overview: Problem Gambling, Public Health and Harm Minimisation in Australia

Gambling in Australia is widely recognised as a legitimate and enjoyable recreational pursuit that attracts participation across multiple forms - from racing and wagering to lotteries, Keno, sports betting, casino table games and electronic gaming machines (EGMs).

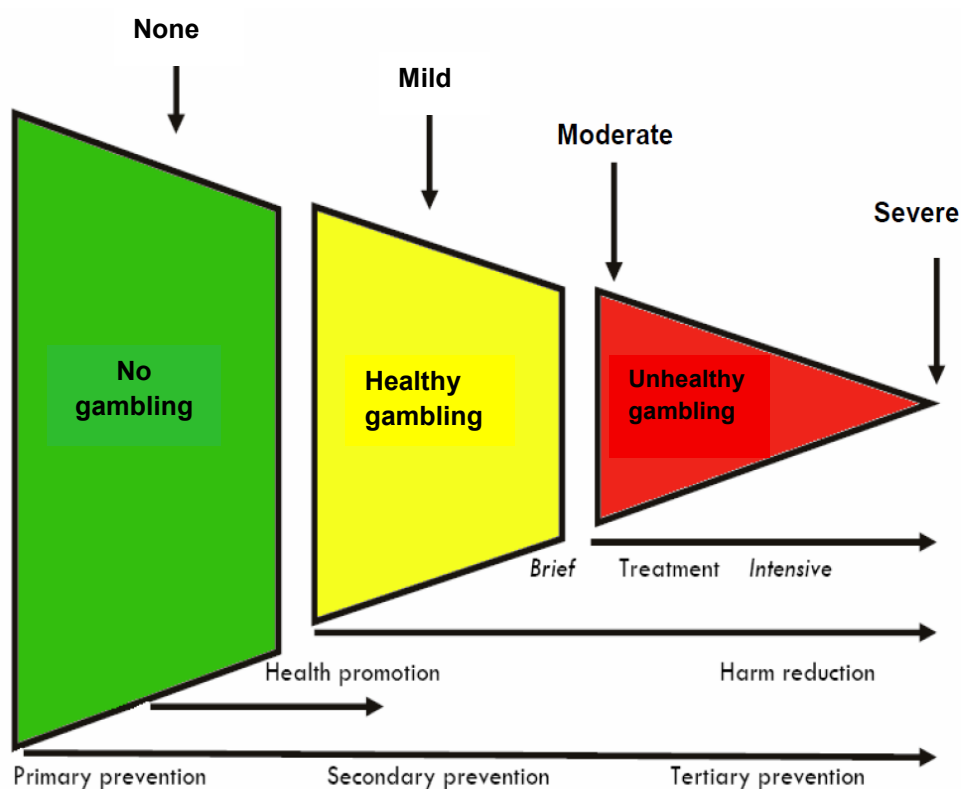
Statistics show that as many as 70% of Australians participate in at least one form of gambling in any year. While the sums outlaid on differing gambling forms vary, total yearly Australian expenditure on gambling amounts to over \$19 billion and contributes 10% of all state/territory taxation revenues.¹

The gambling industries are a significant employer. They are also major contributors to tourism, hospitality and funding for the local community sector.

These positive contributions to consumer enjoyment, employment and the economy are juxtaposed with a clear understanding that while the majority of Australians gamble responsibly and within their means a relatively small but significant proportion of the population experience problems associated with gambling. Problems may range in severity, but have the capacity to impact heavily, on financial, psychological, social and familial well-being.

Problem gambling is a complex psycho-social phenomenon that is recognised by Australian governments, community service providers and industry stakeholders as a public health concern. There is a concomitant commitment from all stakeholders to furthering a public health approach that seeks to prevent, minimise and treat harm.

Figure 1: Public Health Framework for Gambling (Korn & Schaffer) ²



¹ Productivity Commission (2010) *Gambling* p6 and Office of Economical and Statistical Research (2011) *Australian Gambling Statistics 27th Edition*. Expenditure figures cited are for the 2008-09 period.

² Schaffer, H & Korn, D. (2002) Gambling and related mental disorders: A public health analysis, *Annual Review of Public Health*, 23:171–212

Primary, Secondary and Tertiary Prevention Activities

Primary Interventions seek to prevent or postpone initiation into problematic behaviour. These interventions can include empowering a targeted population with the necessary knowledge and skills to make informed choices about gambling, therefore preventing participants from becoming problem gamblers. Primary prevention initiatives focus on educating and raising awareness of potential risks and consequences of gambling or developing skills to help identify and cope with problematic gambling behaviours.

Secondary Interventions emphasise protections and aim to discourage risky behaviours, as well as the reduction of the incidence, prevalence and negative consequence of problem gambling. These types of interventions include both voluntary and mandatory restrictions and modification on gambling products and services, and target the full spectrum of gambling severity behaviours.

Tertiary Interventions aim to treat or potentially reverse the problems occurring in existing problem gamblers.³

Source: Disley (2011)

Effective prevention requires “coordinated, extensive and enduring efforts between effective educational initiatives and effective policy initiatives.” Efforts must also be “sustained and long lasting because population-wide behavioural change takes a long time”.⁴

Over time, Australian states and territories have overseen the implementation of a multi-faceted suite of initiatives and programs that seek to prevent problem gambling, minimise the harms that may arise from problematic gambling and provide means by which those experiencing problems may be alerted to and directed towards helpful treatment options.

Many current strategies have been fostered in a collaborative environment where all stakeholders have contributed constructively to bring about a culture of responsible gambling in Australian venues.

The regulatory requirements and programs that have developed show some variation between differing jurisdictions and venue types, however common policies and initiatives now include -

Primary interventions to reduce the incidence of gambling-related harm and promote informed choice such as:

- The provision of meaningful information on price, odds, rates of return and Electronic Gaming Machine (EGM) functions;
- Warnings regarding the signs of problem gambling and messaging attached to the EGM;
- The provision of information on support service and counselling availability;
- The provision of expenditure statements; and
- Community awareness campaigns, information materials and education programs.

Secondary intervention strategies such as:

- Programs enabling self-exclusion from gambling activities at the venue;
- Voluntary pre-commitment programs to assist consumers in limiting their time and expenditure;
- State-wide and regional EGM caps;

³ Disley, E., Politt, A., Culley, D. And Rubin, J (2011) *Map the Gap: A Critical Review of the Literature on Gambling Related Harm*, Rand Europe p29

⁴ Williams, R.J., West, B.L., & Simpson, R.I. (2007) *Prevention of Problem Gambling: A comprehensive review of the evidence*. Report prepared for the Ontario Problem Gambling Research Centre, Guelph, Ontario p. 42

- The requirement for a social impact assessment prior to an increase in EGM numbers at gaming venues;
- Restrictions upon venue opening hours – including mandatory shut-down periods;
- Restrictions and penalties precluding the access of minors to gambling and gambling products;
- Bans on gambling with credit;
- Restrictions to the location and withdrawal limits of ATMs;
- Restrictions to the availability of/ or limits to Bank Note Acceptors (BNAs) on EGMs;
- Cheque pay-out requirements for large wins;
- Advertising restrictions or bans and bans on promotions and inducements to gamble;
- Lighting and other environmental requirements (such as the provision of clocks on EGMs and prohibitions upon smoking); and
- Restrictions upon the provision of alcohol.

Governments and industry have also furthered extensive consumer assistance commitments in this area such as:

- Training programs for venue staff in the delivery of responsible gambling; as well as
- The formulation of comprehensive responsible gambling codes of practice.

Tertiary interventions (generally provided by government agencies) include:

- Gambling assistance hotlines and websites;
- Self-help strategies and peer support groups; as well as
- Counselling services providing psychological interventions and assistance.

After over a decade of efforts made in this regard, the prevalence of problem gambling across Australian jurisdictions has shown a downward trend.

The Productivity Commission report of 2010 recognized that, on balance, notwithstanding various limitations in comparing studies over time, the evidence suggests that prevalence rates have fallen.⁵

However work still remains to be done. Despite the steady progress of gambling research the area is relatively young. As a consequence, insufficient evidence – and subsequent debate – abounds in a number of areas.

The sheer number of policy initiatives undertaken in Australian states and territories over the past decade has also created confusion and difficulty in presenting any coherent national picture. Volumes of regulation illustrate the complexity that has arisen and the inter-jurisdictional differences, even where slight, that exist.

In providing a science-based framework ('The Reno Model')⁶ for responsible gambling based upon the assumptions pertinent to a harm minimisation approach, Blaszczynski, Ladouceur & Shaffer note that socially responsible regulation must demonstrate:

- a likelihood of effectiveness based upon scientific principles and research; and
- an awareness of the potential for unintended consequences among the target group and the broader population of harm-free recreational gamblers.

Responsible gambling programs and practices should thus be tested to:

⁵ Productivity Commission (2010) *Gambling* p 5.37

⁶ Blaszczynski, A., Ladouceur, R., & Shaffer, H.J. (2004) A Science-Based Framework for Responsible Gambling: The Reno Model, *Journal of Gambling Studies*. 2004 Fall; 20 (3): pp 301-17.

- measure effectiveness in reducing the incidence of gambling-related harm; and
- ensure that the reduction in incidence leads to decreases in the point and period prevalence rates associated with gambling related harm.

All of the responsible gambling measures that have been introduced in Australia have aimed to promote responsible gambling behaviours or combat the harm that may arise through problematic consumption of gambling.

However, few have been implemented by a process fully reflecting the principles outlined above and there has been a notable lack of subsequent, systematic evaluation.

Equally, a range of treatment approaches are available – many for which there is a current lack of evidence regarding their efficacy and/or longevity of results. This is not to suggest that they are ineffective – but rather that the current state of knowledge is not sufficient to adjudge.⁷

The AGC submits that future initiatives and regulatory goals must comprise realistic, evidence-based measures that are proportional to the issue addressed, thoroughly evaluated against a range of feasible options for their cost-benefit/impact and remain relevant and effective over time.⁸

The AGC considers that it is appropriate for the Commonwealth government, through the Council of Australian Governments (COAG), to further a high level national framework in consultation with state/territory governments to continue addressing the issues that arise in the prevention and treatment of problem gambling.

Such a framework should enable systematic evaluation of prevention and treatment efforts already being undertaken, identify through targeted research key focus areas and clear objectives for future initiatives, while promoting the principles of collaboration, coordination and consistency in gambling regulation across the nation.

⁷ See for example commentary in Problem Gambling Research and Treatment Centre (PGRTC) (2011) *Guideline for screening, assessment and treatment in problem gambling*. Clayton: Monash University p33

⁸ The industry supports the COAG Guidelines for Best Practice Regulation - .
http://www.finance.gov.au/obpr/docs/COAG_best_practice_guide_2007.pdf

1. Primary Interventions to Prevent Problem Gambling: Information and Education

1.1 AGC comments in brief

- Information and education about gambling that is clear and accessible plays an integral role in preventing harm by increasing the understanding and application of informed consumer choices and fostering responsible gambling practices.
- Research findings regarding the level of consumer awareness around gambling products and support services suggest that community information campaigns may need to be further refined and/or re-vitalised and that there is a need to de-stigmatise the use of existing problem gambling services.
- Consumer education and financial literacy packages for both adults and youth would benefit from the inclusion of responsible gambling information.

1.2 Provision of information in the venue

Informed choice is a cornerstone of responsible gambling. Accurate, clear and accessible information to the community in general and to gamblers in particular is necessary to:

- promote increased awareness of risks associated with gambling;
- provide increased understanding of how gambling products work and the probability of winning a prize;
- encourage responsible gambling practices;
- help people recognise problem gambling behaviours;
- inform and educate consumers about the assistance programs available for those experiencing gambling problems; and
- increase the application of responsible behaviours.⁹

State governments and gambling venues throughout Australia have developed and routinely provide a range of information products that seek to promote informed consumer choice.

Placed prominently within venues throughout all Australian jurisdictions are signage, brochures, posters, wallet cards and other materials (both written and electronic) that feature:

- responsible gambling messages;
- information detailing game rules, explaining odds and clarifying rates of return;
- warnings about the dangers of excessive/problem play;
- information about the behaviours indicative of problem gambling; and
- contact details and information about the support services available for those experiencing problems.

⁹ Blaszczynski, A., Ladouceur, R., Nower, L. & Schaffer, H (2005) *Informed Choice and Gambling: Principles for Consumer Protection*, Australasian Gaming Council, p 5.

Responsible gaming messages and contact details for support services can additionally be found on EGMs, ATMs, loyalty program outlets and terminals, venue tickets and competition entry forms.

Message placement and accessibility are also important. A strategy in current use is the placement of information and support service contact details in toilets and other unobtrusive locations within the gaming venue to be taken or read in privacy – reducing stigma for help-seekers who may otherwise be disinclined to access materials in a more public setting.

Australian jurisdictions have a number of approved responsible gambling messages and information materials must be made available in multiple language formats.

In the understanding that message fatigue can become an issue¹⁰ a variety of differing messages have been used over time and in South Australia a rotation schedule for responsible gambling messages has been implemented.¹¹

Industry providers have also formulated additional messaging campaigns. For example, The Australian Leisure and Hospitality Group (ALH) has engaged high-profile former AFL footballer, David Schwarz, as a Responsible Gambling Ambassador. Schwarz uses his sporting media profile and well-documented personal experience of problem gambling to facilitate awareness and promote a responsible gambling self-appraisal message displayed throughout the group's licensed venues.

Research into messaging and information formats has illustrated that to influence behaviours information should go beyond simple slogans and presentation of odds and probabilities (which are often misunderstood) and aim to modify values, attitudes and erroneous perceptions.¹²

The gaming industry has actively participated in the creation of materials designed to assist consumers in just such a manner.

For example, the Gaming Technologies Association (GTA) has developed a leaflet and online presentation outlining the myths, superstitions and false beliefs that have arisen around EGM play. Both of these information products address the issue of how EGMs operate, explain the concept of player returns and underscore adherence to responsible gambling decisions and behaviours.¹³

Reviews, such as that undertaken in 2010 by the Productivity Commission, noted that in-venue information materials represent a cost effective and important referral source for help-seekers.¹⁴

A more recent review conducted for Gambling Research Australia (GRA) has similarly affirmed that venue signage advertising help services has importance and should be both retained and further enhanced.¹⁵

The AGC agrees with the finding of the Productivity Commission that there is benefit to be had in ensuring warnings and responsible gambling messages are made more effective. In particular, "research is required to target optimal language and visual images and messages should also be reviewed and/or changed as it is found that their effectiveness wanes".¹⁶

¹⁰ See for example the commentary of Delfabbro, P (2009) *Australasian Gaming Review*, Independent Gambling Authority of South Australia p140

¹¹ See for example Schedule 1 of the South Australian Responsible Gambling Code of Practice for Gaming Machines <<http://www.iga.sa.gov.au/pdf/rules_forms_codes/2011/GM-RGCode-V02-dist.pdf>>

¹² Blaszczynski, A., Ladouceur, R., Nower, L. & Shaffer, H. (2005) *Current Issues – Informed Choice and Gambling: Principles for Consumer Protection*, Australasian Gaming Council.

¹³ Gaming Technologies Association <<http://www.gamingta.com/responsible_gaming.html>>

¹⁴ Productivity Commission (2010) *Gambling* p8.7

¹⁵ Hing, N., Nuske, E. & Gainsbury, S. (2011) *Gamblers at-risk and their help-seeking behaviour*, Gambling Research Australia

¹⁶ Productivity Commission (2010) *Gambling* p8.15

Messages may need to have visual resonance with gamblers and be stratified to ‘speak’ to differing gambler risk categories and demographics – as has been exemplified by Victorian and Queensland campaigns.¹⁷

Technology must also be harnessed in new and more effective ways. Currently the AGC looks forward to the findings of trials being held in Queensland into dynamic messaging capability that provides responsible gambling messages to the screen of the EGM itself.

These trials are based on recommendations flowing from Australian research that provided support for the effectiveness of on-screen warnings containing self-appraisal messages as an appropriate harm-minimisation initiative for EGM players.¹⁸

EGM technology however is not the only technology that should be considered. The media landscape has changed radically over the past decade as both internet access and smartphone penetration in Australia grow.

There are now a plethora of devices and engagement platforms that will allow future public health and gambling information campaigns to use differing media streams, capable of targeting and engaging specific demographics, with tailored messages for prevention and information about how to seek treatment.

1.3 Informing future gambling information and education campaigns

A number of information and education campaigns have been conducted over the years – largely as the province of state and territory governments. The AGC feels that there is scope for more awareness raising to be conducted at both state and national level.

A recent study regarding the help-seeking behaviours of gamblers at-risk undertaken for GRA by Hing, Nuske and Gainsbury¹⁹ has pointed out that, despite the range of messages and information products available, there remains overall a “low awareness of professional sources of help” and a “low willingness to use these services before experiencing a severe financial crisis”.²⁰

The authors, among many recommendations, advise that “advertising of counselling services include information that controlled or reduced gambling may be an alternative goal to complete abstinence, so as not to deter help seeking from those who are reluctant to abstain completely from gambling” and that “efforts to de-mystify counselling appear warranted” as are “consumer education programs that assist gamblers and their significant others to recognise a gambling problem”.²¹

The same study reported that “serious efforts are needed to de-stigmatise problem gambling, to help lower the shame and embarrassment that keeps problem gambling a hidden issue for many and that deters help-seeking”.²²

Removing the stigma from help seeking and promoting increased awareness of how to recognise problems and access gambling help is an important ongoing task which may benefit from fresh, extensive and nationally coordinated community information programs.

The GRA report by Hing et al contains extensive guidelines for campaigns aiming to increase help-seeking behaviour in at-risk gamblers – including multiple recommendations regarding consumer

¹⁷ A number of the differing Victorian campaigns can be viewed at < <http://www.problemgambling.vic.gov.au/main/video-archive>>

¹⁸ Monaghan, S & Blaszczynski, A (2009) Impact of mode of display and message: Content of responsible gambling signs on EGMs for regular Players, *Journal of Gambling Studies* Vol. 26 No 1 March 2010

¹⁹ Hing, N; Nuske, E & Gainsbury, S (2011) *Gamblers at-risk and their help-seeking behaviour*, Gambling Research Australia

²⁰ Ibid

²¹ Ibid

²² Ibid

education campaigns and advertisements for help-services as well as specific initiatives for culturally and linguistically diverse (CALD) and indigenous populations.

The AGC considers that these research based recommendations serve as a good starting point for consideration when formulating future community information and education campaigns.

1.4 Gambling, financial literacy and school-based education programs

A review of problem gambling and the role of the financial sector by the South Australian Centre for Economic Studies (SACES) prepared for the Australian Government Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) has reported that financial literacy awareness is a key issue for problem gamblers and, more broadly, the community in general.²³

The AGC has recommended for some time that financial literacy information should form the nucleus of innovative programs that involve an understanding of effective money management practices in gambling as part of both youth and adult education.

For youth in particular, the AGC has long seen a clear need for a coherent and balanced national approach to gambling education.

Evidence suggests that while young people do not have legal access to terrestrial gambling venues gambling remains a common activity in youth who may lack accurate understanding of the true odds of gambling activities and who show problem gambling prevalence rates higher than that of the adult population.²⁴

The 2010 review of the Productivity Commission provided less support for school-based initiatives, citing the potential for adverse outcomes of gambling education programs for youth as a concern and emphasising that there is as yet, little evidence to show such programs work to create positive behavioural change.²⁵

While acknowledging these concerns the AGC remains of the strong view that responsible gambling education programs are an important part of the middle and senior school curriculum - together with other programs presenting information and protective behaviour strategies.

Programs about the responsible use of alcohol, credit and driver safety – all activities which young people will face as they grow to adulthood - are already well established in school curriculum offerings and in national curriculum development.

In a number of international jurisdictions school based gambling information programs for youth have been regarded for some time as an important initiative.²⁶

Education and information which allows young people to make wise choices about the use of discretionary money and provides an understanding of safe behaviour is one part, but a critical part, of broader strategies to prevent and reduce harm from gambling.

²³ South Australian Centre for Economic Studies (2011) *Occasional Paper No 33: Problem Gamblers and the Role of the Financial Sector*

²⁴ Australasian Gaming Council and the University of Melbourne School of Social Work (2007) *New Directions: Gambling Education and Financial Literacy for Young People*, Australasian Gaming Council p7

²⁵ Productivity Commission (2010) *Gambling* p9.20

²⁶ See for example Dickson, L, Derevensky, J and Gupta, R. 'The prevention of gambling problems in youth: a conceptual framework' International Centre for Youth Gambling Problems and High-Risk Behaviors, McGill University *Journal of Gambling Studies* 2002 Summer;18(2):97-159. A brief list of currently available schools based programs is available on the AGC website at <http://www.austgamingcouncil.org.au/index.php?option=com_content&task=section&id=20>

This message has not been lost on Australian states and territories – most of which have already developed a number of quality gambling education programs for Australian schools.²⁷

In 2005 Delfabbro and Lambos concluded of the South Australian *Dacey Dealings* Schools Gambling Education Program that it:

“had been successful in providing young people with a more realistic and rational understanding of gambling. Participants appear less susceptible to erroneous beliefs concerning gambling odds and outcomes, and appear to be more cautious about the potential financial benefits of gambling. The programs also appeared successful in increasing young people’s awareness of the possible negative consequences of problem gambling, of the different forms of gambling activity, and of some of the formal services that are available to assist problem gamblers.”²⁸

The AGC suggests that an evaluation of existing school gambling education programs, from both Australian and international jurisdictions, as well as an exploration of the potential for new programs, would help to ensure that materials provided and learning outcomes achieved are effective and without unintended consequences.

²⁷ Australasian Gaming Council and the University of Melbourne School of Social Work (2007) *New Directions: Gambling Education and Financial Literacy for Young People*, Australasian Gaming Council pp 10-14

²⁸ *Dacey Dealings - Pilot: Final Report Phase*, South Australian Department of Education and Children's Services (2007) p21 referencing Delfabbro P & Lambos C (2005) *Dacey Dealings Final Report, Outcome Evaluation*. University of Adelaide

2. Secondary Intervention Strategies: Staff Training and Early Intervention

2.1 AGC comments in brief

- Gambling venue staff are at the front line of interaction with consumers and represent a key responsible gambling resource.
- Research has identified a list of observable signs that indicate a gambler may be experiencing problems but acknowledges also the practical difficulties of implementing early intervention strategies within the gaming venue setting.
- Responsible gambling staff training requires continual review and update to ensure that staff are equipped with the necessary training to best assist consumers.

2.2 Responsible gambling staff training and early intervention

Responsible gambling training has grown with the understanding that gaming staff are at the front line of interaction with consumers and represent a key resource in creating responsible gambling environments.

Although the exact nature and requirements of staff training in responsible service of gaming can differ between jurisdictions, courses generally follow the responsible gambling principles set out by the Ministerial Council on Gambling and follow a nationally specified competency unit.

Comprehensive staff training and refresher training procedures have been developed over time. Courses are taught by a number of registered training organisations (including industry organisations) throughout Australia and usually include entry level training for gaming venue staff and advanced training designed for management or nominated venue staff who may act as Responsible Gambling Officers/Contact Officers.

Training in responsible gambling generally seeks to equip staff with:

- Knowledge of the mandatory regulatory requirements and voluntary measures undertaken by specific gambling providers in that particular state/territory – often with detailed analysis of relevant codes of practice;
- Knowledge of the benefits of the gambling industry to economic growth and community development;
- Knowledge of the nature of gambling and problem gambling – including behaviours identified by research that may indicate problem gambling;
- How to respond to gamblers who may be experiencing difficulty and communicate with those who may be showing signs of distress. This training also focuses on the sources of counselling and support that are available and how to institute an appropriate referral process - noting that elements may vary between providers (some of whom have a tiered responsibility and referral process).²⁹

²⁹This overview is based on discussion written by Delfabbro, P.(2009) *Australasian Gaming Review – Fourth Edition*, Independent Gambling Authority p196-197

In 2002, the AGC asked prominent psychologists and practitioners in the field to give their professional views on problem gambling behaviours. The research sought to ascertain whether such behaviours could be reliably identified within a gambling venue, with a view to informing effective and appropriate staff training.³⁰

The AGC paper concluded that staff should not diagnose problem gamblers and that clear, definitive behaviours reflecting only gambling harm are difficult to ascribe.

However it went on to list some behaviours considered to be indicators of possible harm and suggested that staff observations in this area may be used to direct assistance to consumers in the form of information and referral to counselling support.

A further study focusing on the possible identification of problem gamblers within the gaming venue was commissioned by GRA and published in 2007.³¹

This research also emphasised the importance of guiding gaming staff in appropriate responses to customers who may be experiencing difficulty and provided a final list of validated indicators of problem gambling noting that some of these behaviours alone, or in combination with other behaviours, could suggest the need for approach and assistance.

The GRA and later studies³² have acknowledged however that while there may be a number of indicators that can assist in identifying possibly problematic gamblers there are also number of practical barriers to utilisation of this information.

Notably, observational methods may be hampered by the frequency with which observable behaviours occur (ie: there is a likelihood that behaviours may go unobserved or observed at differing times by differing staff members) suggesting a need to accumulate information about behaviours over multiple sessions.

Staff may also require intensive training and support to feel comfortable in approaching gamblers experiencing difficulty.

To support staff and provide the best assistance to consumers the industry often takes a tiered approach – adopting a process of referral to responsible gambling officers or management who have undergone further training.

Despite any difficulties involved it is widely accepted by the industry that an approach by appropriately trained staff to provide information and assistance in those instances where a gambler shows signs that they may be experiencing problems is an important measure to prevent and reduce harm.

Such measures are consistent with the industry standards of patron care as well as with Responsible Gambling Codes of Conduct which are now mandatory in almost all Australian jurisdictions.

The AGC supports a view that training should go beyond merely testing knowledge and must enable active learning that provides venue workers with the skills to interact effectively with consumers as their particular role at the venue may dictate.

³⁰ Allcock, C. et al. (2002) *Current Issues Related to Identifying the Problem Gambler in the Gambling Venue*, Australasian Gaming Council.

³¹ Delfabbro, P., Osborn, A., Neville, M. and Skelt, L. (2007) *Identifying problem gamblers in gambling venues*, Gambling Research Australia.

³² Delfabbro, P; Borges, M and King, D (2011) Venue Staff Knowledge of their Patrons' Gambling and Problem Gambling, *Journal of Gambling Studies*

To this end increased skills training for venue staff intervening with possible problem gamblers has been provided in a number of jurisdictions through collaboration with local community health and gambler support services.

Some examples include:

- Western Australia - where Burswood Casino has collaborated with Gambling Help WA (Centacare) in both staff training and the provision of ongoing referral for problem gamblers;
- South Australia – where SKYCITY Adelaide, in consultation with Uniting Care Wesley, has developed programs and training that focus on the provision of support and assistance to customers in conjunction with the casino’s dedicated Host Responsibility Program; and
- Victoria - where the recently created Venue Support Worker program provides extra responsible gambling training and assistance to venues through Gambler’s Help Services.

Given the variety of courses and training organisations available throughout Australia at national level, there are likely to be some differences in the quality of training provided as well as the skills enabled and approaches used.

A review of the Victorian responsible gambling training regime for example has noted that there is a need for a quality assurance framework, standardised assessments and multiple levels of training.³³

The AGC suggests that ongoing review, a sharing of knowledge across jurisdictions and implementation of best practice in the programs available (as well as continued update of responsible gambling training and refresher courses) is warranted in order to ensure that training is providing the best possible outcomes for venues, staff and consumers nationwide.

Additionally, in the recognition that staff from gaming venues may also participate in gambling as consumers, responsible gambling training for staff has a valuable dual purpose.

Research by Hing and Breen for example has found that responsible gambling training may act as a protective factor for employees themselves, helping guard to some extent against the development of problematic gambling behaviours.³⁴

³³ Victorian Auditor General's Audit Report (2010) *Taking action on problem gambling* pp 27-28

³⁴ Hing, N. & Breen, H 2008, 'Risk and protective factors relating to gambling by employees of gaming venues', *International Gambling Studies*, vol. 8, no. 1, pp. 1-23.

3. Marketing Strategies and the use of Inducements/Incentives to Gamble

3.1 AGC comments in brief

- For EGM providers the ability to advertise the availability of EGM gambling is extensively regulated (through statute or codes of practice) if not prohibited.
- There are also prohibitions evident in a number of Australian jurisdictions on the use and availability of ‘inducements’ to gamble – which need to be differentiated from promotion of the venue.
- The research evidence is mixed as to what inducements may increase or lead to problem gambling.
- Loyalty program communications are often a key measure by which gambling venues convey responsible gambling messages and initiatives to members.

3.2 Regulatory prohibitions on marketing and inducements to gamble

The unevenness of the regulatory space with regard to the advertising and marketing of differing gambling forms (as well as the numerous cross-jurisdictional differences that exist with regard to the regulation of EGM marketing) was discussed in the Productivity Commission’s 2010 review of gambling.

The Commission noted that an “extensive array of rules already guide how gambling products can be marketed in Australia” and, in a nutshell, that the most stringent prohibitions have been placed on any advertisement of EGM gambling.³⁵

For example, in Victoria under the *Gambling Regulation Act 2003*, a prohibition on all gaming machine related advertising through the media and unsolicited mail came into effect on 1 January 2005. Strict rules apply to the ability of venues in Victoria to use signage on the venue to advertise the presence of EGMs. Strong prohibitions on EGM advertising also exist in NSW.

In other jurisdictions around Australia extensive requirements and caveats, found in either voluntary or mandatory codes of practice, apply in those instances where outright prohibition is not the case.³⁶

Advertising restrictions ³⁷	
ACT	A mandatory Code of Practice restricts and governs advertising by all gambling licensees.
NSW	All off-premises gaming machine advertising, and gaming machine advertising outside venues is banned. Some limited exemptions exist where promotional materials may be sent to members by consent in conjunction with other information.
NT	Advertising must comply with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers or the Advertising Federation of Australia. TV advertising must comply with the Federation of Commercial Television Stations (FACTS) Code of Practice.
QLD	Industry advertising is bound by the voluntary Responsible Gambling Advertising and Promotions Guideline.
SA	A mandatory Code of Practice restricts and governs advertising.

³⁵ Productivity Commission (2010) *Gambling* Volume 2 Appendix K p.K.4

³⁶ For a summary of current jurisdictional requirements see for example the Interstate Comparison Table of Harm Minimisation Requirements provided by FaHCSIA at

http://www.fahcsia.gov.au/sa/gamblingdrugs/pubs/NationalSnapshotHarmMinimisation/Pages/awareness_programs.aspx#3

³⁷ Table information derives from FaHCSIA’s Interstate Comparison Table of Harm Minimisation Requirements with updates added by the AGC

TAS	A mandatory Code of Practice restricts and governs advertising.
VIC	There is a ban on the publishing of any gaming machine advertising outside the gaming machine area of an approved venue or the boundaries of a casino.
WA	Gaming and Wagering Commission Regulations 1988 govern advertising for the casino operator.

Strict rules apply also to the provision of any in-venue promotions and activities which may be construed as inducements to gamble.

In South Australia and the Northern Territory for instance there is a ban on all inducements while in other states and territories restrictions may apply specifically to particular activities - such as the offer of free food, free or discounted alcohol or free credits.

Ban on inducements ³⁸	
ACT	No specific ban however the mandatory Code of Practice places restrictions on inducements including a prohibition on offering free or discounted alcohol.
NSW	Legislation bans gambling-related inducements offered by clubs, hotels and casino. Inducements cannot include free or discounted liquor or offer free credits to players.
NT	A ban on all gambling related inducements.
QLD	No legislated bans on gambling inducements however the voluntary QLD Responsible Gambling Code of Practice provides that gambling providers are to develop and implement strategies to ensure advertising and promotions do not involve any irresponsible trading practices by the gambling provider.
SA	The mandatory Code of Practice outlines a strict ban on all inducements.
TAS	Inducements are restricted by the mandatory Code of Practice.
VIC	No specific ban on inducements however provisions under the mandatory Responsible Gambling Codes of Conduct govern the activities of the gaming provider
WA	Gaming and Wagering Commission Regulations 1988 govern the activities of the casino.

Player Loyalty Programs (where available to EGM gamblers) are also subject to strict rules regarding their use under both regulation and/or responsible gambling codes of practice.

For example, the Tasmanian Responsible Gambling Mandatory Code of Practice includes requirements for the provision of Player Activity Statements to loyalty program members, specifies, how often and what types of responsible gambling messaging and information should be provided to members and that loyalty program point accrual should not focus exclusively on gambling activities where other activities may be available.³⁹

Restrictions on player loyalty systems / programs ⁴⁰	
ACT	Governed by the mandatory Code of Practice
NSW	Cash cannot be offered as a prize and the maximum value of prizes is limited to \$1,000. Player Activity Statements must be made available to all program participants.
NT	No specific provisions.
QLD	Governed by comprehensive voluntary Player Loyalty Guidelines
SA	Governed by the mandatory Code of Practice.
TAS	Governed by the mandatory Code of Practice.
VIC	Restrictions effective from 1 July 2003 include a requirement that any loyalty program must enable participants to set net time and loss limits and must provide participants with annual Player Activity Statements.
WA	No specific provisions.

³⁸ Table information derives from FaHCSIA's Interstate Comparison Table of Harm Minimisation Requirements with updates added by the AGC

³⁹ Tasmanian Gambling Commission (2012) *Responsible Gambling Mandatory Code of Practice for Tasmania* <[http://www.treasury.tas.gov.au/domino/df/df.nsf/LookupFiles/MandatoryCodePractice1.1.pdf/\\$file/MandatoryCodePractice1.1.pdf](http://www.treasury.tas.gov.au/domino/df/df.nsf/LookupFiles/MandatoryCodePractice1.1.pdf/$file/MandatoryCodePractice1.1.pdf)>

⁴⁰ Table information derives from FaHCSIA's Interstate Comparison Table of Harm Minimisation Requirements with updates added by the AGC

3.3 Marketing activities, inducements and problem gambling

Most of Australia's EGM gambling venues are multi-faceted businesses that offer a variety of entertainment. Even at the smallest venues facilities on offer can cover a diverse range of gaming, live music, accommodation, dining and events.

In examining venue marketing strategies then it is important to define what may constitute an inducement/incentive *to gamble* as opposed to general marketing or promotional activity of the venue.

The Productivity Commission's 2010 review recognised this distinction - stating that

"Inducements that are part of the general promotion of and marketing of venues to increase their patronage are likely to have broad recreational appeal. To restrict them would reduce the enjoyment of venue patrons. However those inducements that are likely to lead to problem gambling or exacerbate existing problems are very difficult to justify and should be prohibited".⁴¹

Overall, the evidence that inducements allowed under the current regulations and codes are likely to increase problematic behaviours to any great extent was found by the Commission to be "mixed".⁴²

For example – with regard to loyalty schemes:

"An analysis of focus up data collected from problem gamblers in South Australia suggested that problem gamblers tend to be aware of loyalty schemes, but that these are only secondary to the process of gambling. Although some reported continuing to gamble in order to obtain prizes and win something back from the venue, most did not consider loyalty schemes to be a major cause of their excessive gambling".⁴³

The Commission's conclusions on this subject reference the nature of the inducement as it may impact problematic play.

For example, the Commission noted that provision of free alcohol to patrons while gambling may act to diminish capacity to make informed choices whereas the provision of free food and drink was not deemed to constitute such a clear cut issue. Rather it was considered that the latter may offer up opportunities for breaks in play and interactions between patrons and staff members as much it may, conversely, be thought to inhibit players taking a break.⁴⁴

Similarly, the AGC notes that loyalty programs, often considered nothing more than a marketing device to retain patronage and reward expenditure within a particular venue (either on gaming or upon other entertainment options), have also proven to be a very useful vehicle for trialling and engaging venue players with limit setting measures for responsible gambling – specifically voluntary pre-commitment programs available at venues in Queensland and South Australia and casinos in Victoria and Western Australia.

Further, given the strict rules regarding EGM advertising and marketing, venue membership programs offer a major vehicle for mail communications with EGM players.

Venue communications of this nature typically include responsible gambling messages and printed information about treatment and help seeking resources as well as Player Activity Statements outlining wins, losses and dates of patronage over a particular period.

⁴¹ Productivity Commission (2010) *Gambling* p12.46

⁴² Ibid p12.45

⁴³ Delfabbro, P and Panozzo, S (2004) *Informing the Codes of Practice: A summary of findings from the 2002 Focus groups undertaken by the Independent Gambling Authority of South Australia*, Report commissioned for the Independent Gambling Authority of South Australia cited in Delfabbro, P (2009) *Australasian Gambling Review* p168 and Productivity Commission (2010) *Gambling* p12.46

⁴⁴ Productivity Commission (2010) *Gambling* pp12.46-12.47

4. Self-Exclusion

4.1 AGC comments in brief

- While the AGC would not categorise self-exclusion as a treatment, research evidences self-exclusion to be a useful strategy for the control of gambling problems.
- Self-exclusion program features do show some variation throughout Australia. There is scope for evaluation of current practices with a view to implementing the most effective program elements in all jurisdictions.
- Changes to reduce complexity and barriers to access while enhancing assistance to consumers are being implemented and assist to address a number of the shortcomings noted in the Productivity Commission's 2010 review.
- Self-exclusion should also be understood as comprising a valuable pathway to counselling and treatment opportunities.
- Provision of formal arrangements allowing third party exclusion could be expected to provide increased support for the families of problem gamblers.

4.2 An overview of current programs

Self-exclusion is an important program offered by the gaming industry for individuals who acknowledge that they have a problem with their gambling and reflects the decision of an individual to assert control through self-barring from gaming venue(s) or gaming areas within the venue.

While of itself not a program of treatment the AGC believes that self-exclusion remains one of the best ways to assist those suffering severe difficulties in controlling their gambling behavior and expenditure and may also act as a useful gateway to treatment for many problem gamblers.

The provision of self-exclusion (and other forms of exclusion) is the subject of a complex body of legislation and regulation throughout Australia that may differ, to some degree, between jurisdictions and gambling providers

In most jurisdictions legislation specifies the operation of exclusion schemes and industry have developed programs in compliance – the exceptions being Tasmania, which operates a state-wide self-exclusion scheme administered by the Tasmanian government⁴⁵ and Western Australia, where EGMs are permitted only in the casino (which runs a voluntary program).

Apart from gambler initiated self-exclusion, some states also have formal provisions for venue initiated welfare exclusion (where gamblers identified as experiencing problems may be excluded from that particular venue)⁴⁶ and in some jurisdictions formal avenues exist for family members to make application to the regulatory authority/exclusion provider for an individual to be barred excluded from gambling (third party exclusion).⁴⁷

⁴⁵ The Tasmanian Gambling Exclusion Scheme is operated by the Gaming and Racing Branch of the Tasmanian Department of Treasury and Finance.

⁴⁶ In the Australian Capital Territory for example under a mandatory Code of Practice administered by the Gaming and Racing Commission and in Tasmania, under the current Gambling Exclusion Scheme, the licensee of a venue or their staff may exclude a person where they believe that the person's behaviour is affecting their own welfare or the welfare of others. Similarly, the Queensland Responsible Gambling Code of Practice requires the provision of venue-initiated exclusions on welfare grounds.

⁴⁷ Third Party Exclusion has been available in South Australia since 2004. Under the *Problem Gambling Family Protection Orders Act* a person affected by a family member's gambling problem can make a complaint in that state to the Independent

4.3 Scope for evaluation and improvement

Systematic review of self-exclusion programs has been extremely limited and there are very few up-to-date studies available.

A recent AUT University literature review of this subject states that there is no single, recognised gold standard for the provision of self-exclusion. Rather, “there are various recommendations made by various authors that largely, but not always, overlap”.⁴⁸

In Australia – although most industry models stress that commitment to remain abstinent should come from the individual and that the responsibility of the venue is not to act as an ‘enforcer’⁴⁹ – reviews conducted have often placed the majority of their focus on program deficiencies in identifying and detecting gamblers in breach of their agreement.

Nevertheless, self-exclusion programs in Australia have been found to hold real benefits for problem gamblers.

Australian assessments of self-excluded gamblers have found significant reductions in expenditure upon gambling as well as improved personal and family relationships.⁵⁰

This finding is echoed in the international literature which reports that, despite some caveats, the benefits of self-exclusion include “essential improvements in financial situation, psychosocial functioning and subjective well-being”.⁵¹

Australian participants in self-exclusion report that, for the most part, they abide by their self-exclusion arrangements and if attempting to breach the agreement by gambling at a venue were often identified by venue staff.⁵²

It has also been reported that, even where the agreement has been breached by the gambler without detection, participants still consider self-exclusion to be helpful overall, occasioning significant reductions in gambling behaviour and improvements in other areas of life.⁵³

The following criteria have been identified internationally as key indicators of established and expected practices in the provision of self-exclusion:⁵⁴

- There should be clear, comprehensive written policies in place;
- The program should be well promoted – at both venue level and in the public arena;

Gambling Authority (IGA). The IGA has powers to make orders to address the gambler's problematic behaviour – including orders requiring the gambler's exclusion from a gaming venue. Similarly, in Tasmania another person can apply to the Tasmanian Gaming Commission for a gambler to be excluded. In NSW Bet safe has protocols for third party exclusion requests.

⁴⁸ Bellringer, M., Coombes, R., Pulford, J. & Abbott, M. (2010) *Formative Investigation into the Effectiveness of Gambling Venue Exclusion Processes in New Zealand*, Gambling and Addictions Research Centre, AUT University p33

⁴⁹ For example the Victorian AHA Self-exclusion program is based on a model of change by Prochaska and Diclemente that stresses gambler commitment rather than industry barring.

⁵⁰ Productivity Commission (2010) *Gambling*, p10.7 quoting assessment studies of Australian self-exclusion arrangements undertaken by Croucher and Leslie in 2007 – who surveyed 135 problem gamblers participating in the Australian Hotels Association (AHA) NSW program and a Macquarie University assessment of the NSW Game Care program undertaken in 2003.

⁵¹ Hayer, T. and Meyer, G. (2011) “Self-Exclusion as a Harm Minimisation Strategy: Evidence for the Casino Sector from Selected European Countries” *Journal of Gambling Studies* 27:685-700 p699

⁵² Productivity Commission (2010) *Gambling*, Report No. 50, Canberra pE.6

⁵³ Ly, Corinna (2011) ‘A Tasmanian study investigating the perspectives of a small group of self-excluders on the impact of self-exclusion on gambling behaviour’ *Gambling Research*, Volume 23, No 1, pp24-40 May 2011

⁵⁴ This list derives from the RG Check Program devised by the Responsible Gambling Council of Canada. For more information– including standards and criteria - visit: <http://www.rgcheck.com>

- The self-exclusion process should be managed in a timely and respectful way by specially trained personnel;
- The exclusion period should be variable and consumers should have a choice of the period in which they seek to ban themselves;
- Consumers who have self-excluded should not receive any promotional materials and should be removed from mailing lists;
- Consumers should receive clearly worded information outlining the conditions of the self-exclusion – including any possible ramifications of breach of the self-exclusion agreement;
- Consumers should receive clear information at the time of self-exclusion about accessing community help resources;
- Data collection at the time of self-exclusion should include sufficient information to enable effective detection of those in breach of their self-exclusion and enforcement;
- Strong enforcement processes should be in place to identify and remove self-excluded patrons;
- There should be an active reinstatement process in place; and
- Renewal of the ban is straightforward and offered both off and on-site.

In Australia self-exclusion programs conform to essentially similar criteria. Throughout Australia however the programs available may show variation in specific program elements.

Beside the somewhat organic development of programs and gambling regulation over time there is little to explain this diversity.

For example:

- Aids to enforcement - such as a provision for the forfeiture of prizes won by self-excluded persons and/or penalties for breach of self-exclusion are provided for in some jurisdictions.⁵⁵
- Requirements for evidence of counselling attendance prior to any revocation of the self-exclusion are a feature of some programs while other deeds may have a clear expiration date after which the gambler can recommence patronage of the venue.
- The actual undertakings of the self-exclusion agreement may vary with regard to exclusion from the venue premises (ie: exclusion may pertain to the entire venue or to gaming areas within the venue only).

The AGC feels that there is scope for a comprehensive review of current self-exclusion program elements in order to determine which of the current variables available offer the most benefit to consumers - with subsequent consideration for their implementation in all jurisdictions.

⁵⁵ See for example the *Victorian Casino Control Act 1991* s78B (Forfeiture of Winnings)

4.4 Reducing complexity and enhancing assistance

Weaker areas in the administration of Australian self-exclusion programs identified in submissions to the 2010 Productivity Commission inquiry included:

- Poor information collection and difficulties in identifying breaches of exclusion (through reliance on outdated or poor quality photographs);
- Lack of ability for gamblers to self-exclude from multiple venues simply and efficiently; and
- Barriers to signing self-exclusion agreements – including variations in the training and professionalism of venue staff and the need to attend a gambling venue to self-exclude.⁵⁶

Difficulties such as these are being overcome to some degree in Australian jurisdictions through the use of centralised administration and oversight processes.

In Victoria and New South Wales for instance, self-exclusion program management that allows multi-venue exclusion and also facilitates self-exclusion away from the gambling venue is undertaken by industry association initiatives such as the AHA (Vic) Self Exclusion Program and, in NSW, the Game Care program and newly launched Club Safe online program.

In Tasmania a centralised multi-venue self-exclusion process is managed via the regulatory authority. South Australia presents a slightly different model. Self-exclusion can be undertaken via the regulatory authority (which caters to multi-venue exclusion) and also in-venue. To assist venues with all facets of responsible gambling – including the South Australian ‘barring’ process – hotel and club industry associations have established a centralised support service (‘Gaming Care’ and ‘Club Safe’).

At casinos, which often operate under slightly different regulatory requirements, centralised processes run by specially trained staff are currently common within responsible gambling units housed within the venue itself.

Benefits of centralised administration processes - elements of the Victorian self-exclusion program (SEP) for clubs and hotels:

Centralised administration of the program allowing the ability to self-exclude from multiple hotel/club venues via the one self-exclusion interview at an office location away from the gaming venue environment with translators available as required;

A jurisdiction-wide online database of Self-Excluded hotel/club patrons with secure venue access to records pertinent to the venue;

Homogenised data collection/dissemination allowing for timely, best quality information/photographs to venues assisting detection and enforcement;

A tiered approach to self-exclusion management that provides support for venue staff;

Oversight of the program by specially trained personnel – including specially trained staff responsible for the oversight of the SEP at state level and specially trained staff responsible for supporting activities and SEP reporting requirements at venue level (Responsible Gambling Officers);

Homogenous information materials that are widely disseminated, simple for venues and customers to understand and readily accessible with availability; and

Established reporting and audit measures with follow-up procedures to rectify any identified issues with engagement, promotion or administration of the program at venue level.

⁵⁶ Productivity Commission (2010) *Gambling*, Volume 2, Appendix E pE.7

4.5 Improving access to counselling and treatment pathways

In 2004, the AGC commissioned a report from leading researchers examining the principles of self-exclusion, the barriers that act to diminish effective implementation and models by which any inadequacies may be addressed.

The AGC report, and subsequent papers also authored by Blaszczynski, Ladouceur and Nower, noted a key deficiency in current programs as over reliance on “external control of an individual’s behaviour” and recognised the potential for self-exclusion to act as a ‘gateway’ to treatment and an important means by which treatment interventions may be supplemented.⁵⁷

“Philosophically the current system is hampered by focus on external control that all but abrogates individual responsibility for controlling gambling behaviour. Individuals are active in initiating the program but, once initiated, they become passive as responsibility shifts to the gambling venue operator to detect and police possible breaches. Such a perspective effectively limits opportunities for gamblers to develop improved stress-coping skills and increases the possibility that they will return to gambling or substitute alternative, maladaptive coping strategies.”⁵⁸

The ‘gateway model’ emphasises and actively provides access to treatment at self-exclusion with a focus upon assisting the gambler to regain control over gambling behaviour. Counselling services commenced at self-exclusion can also provide ongoing support, monitoring and mentoring:

A trial of self-exclusion following some of the major principles of the gateway model was commenced through a partnership between the Victorian Gaming Machine Industry (VGMI), Gambler’s Help and the Victorian Office of Gaming and Racing in 2007. Gamblers in the self-exclusion program administered by the AHA (Vic) participated.

Program results were promising and evaluations showed improved links to treatment and a higher uptake of counselling opportunities. The program was found to emphasise education and rehabilitation and additionally worked to reduce perceived conflicts of interest while increasing transparency in implementation and monitoring.⁵⁹

The initial pilot program has now evolved in Victoria to become an established partnership between the self-exclusion management team at the AHA (Vic) and Gambler’s Help Counselling Services.

The AGC suggests that greater benefits could accrue to self-excluding gamblers where programs actively seek to incorporate formal pathways to ongoing counselling and treatment at the time of self-exclusion.

It should be noted that implementation of any such model does not abrogate the need for gaming venues to continue providing active support for self-exclusion programs and vigilance around breach of self-exclusion.

It suggests rather that better links to treatment and education in this manner could “optimally shift the focus over time from an industry policing focus to individual monitoring of gambling self-efficacy”.⁶⁰

⁵⁷ Blaszczynski, A., Ladouceur, R. & Nower, J. D. (2004) *Current Issues - Self-Exclusion: A Gateway to Treatment*, Australasian Gaming Council.

⁵⁸ Blaszczynski, A., Ladouceur, R. and Nower, L. (2007) ‘Self-exclusion – A Proposed Gateway to Treatment Model’, *International Gambling Studies*, 7:1 59-71 p67

⁵⁹ Victorian Self-Exclusion Pilot Partnership, Presentation to the National Association for Gambling Studies Conference, Wednesday 3 December, 2008

⁶⁰ Ibid p18

4.6 The provision of 'Third Party' exclusion arrangements

There has been recent federal interest in the ability to apply for exclusion by third parties - such as family members of the gambler.⁶¹

The gambling industry recognises that a number of those who gamble problematically may be unwilling to take steps to self-exclude.

In some states formal avenues currently exist for family members to make application to the regulatory authority/exclusion provider for an individual to be barred from gambling venues.

In South Australia, under the *Problem Gambling Family Protection Orders* scheme, a person (for example a spouse, domestic partner or child) who is affected by a family member's gambling problem can make a complaint to the Independent Gambling Authority about the family member's gambling problem.

The Authority has powers to make orders to address the person's problem gambling behaviour, which can include barring from gaming venues, requirements to attend counselling and requirements about payment of wages. The Authority will not usually make any orders until it has conducted a hearing into the complaint.⁶²

Similarly, in Tasmania applications of this kind may be made to the regulatory authority while in New South Wales Bet Safe has instated a third party complaints policy and procedure for 'third party' self-exclusion.⁶³

In Western Australia, the Burswood Casino has a comprehensive Third Party policy and process which enables a family member or friend to apply for a patron to be excluded from the Casino – typically, the patron is approached and the patron's gambling behaviour assessed, and self-exclusion encouraged, with the consent of the third party.

Provision of formal arrangements for allowing third party exclusion would be expected to provide increased support for the families of problem gamblers.

The AGC recommends a review of the differing programs available in order to determine which model(s) could offer the most benefit to consumers.

⁶¹ See for example discussion at http://www.problemgambling.gov.au/wp-content/uploads/2012/02/factsheet-counselling_support_services2.pdf

⁶² <http://www.iga.sa.gov.au/problem.html>

⁶³ Bet Safe submission to the 2009 Productivity Commission Inquiry

5. Tertiary Interventions: Treatment (Counselling) and Support Measures

5.1 AGC comments in brief

- The rate of co-morbid disorders in the problem gambling treatment population suggests that problem gambling services should pursue linkages with other public health services and that key health services/clinicians should be provided with training in how to identify, assist and/or refer those presenting with gambling problems.
- Available research suggests that Cognitive Behavioural Therapy (CBT) is supported as the most effective treatment currently available.
- Given the low proportion of those experiencing problems who access formal counselling, research into the brief interventions and self-help measures that may be of most benefit to gamblers is also clear necessity.

5.2 Linking problem gambling services with other key public health services

Problem gambling may typically arise from (and/or give rise to) a range of other co-presenting and co-morbid issues, including depression, anxiety, alcohol and drug issues, ill-health, domestic violence, homelessness, financial hardship, legal problems, unemployment and relationship breakdown.

Studies into the prevalence of co-morbid disorders associated with problem gambling have shown that the rates of co-morbidity in problem gamblers are extremely high⁶⁴ and that the relationship between gambling problems and co-morbid disorders will effect treatment selection and impact on the effectiveness of treatment.⁶⁵

In some jurisdictions, following an awareness that problem gamblers are more likely to first present to their local GP for assistance with co-morbid conditions, specific resources have been targeted at this health provider group to enhance knowledge of factors (such as problem gambling) that may be contributing to the issues presented by their clients.⁶⁶

A good online resource is also available to provide information to health professionals about problem gambling identification and treatment referral.⁶⁷

Research has found however that “many Australian GP’s are not screening for gambling problems in their patients” and there is concern that the screening tools available may be “too time consuming for routine use in a primary care practice”.⁶⁸

A one item screening tool may assist and has been suggested for use by general practitioners and others in the broader health care spectrum.⁶⁹

⁶⁴ Anderson, Christopher (2011) *The Cochrane Systematic Review of Treatments for Problem Gambling*, Presentation to the International Think Tank on Gambling Research, Policy and Practice, Melbourne March 2011

⁶⁵ Problem Gambling Research and Treatment Centre (PGRTC) (2011) *Guideline for screening, assessment and treatment in problem gambling*. Clayton: Monash University p21

⁶⁶ For example South Australia, NSW and Victoria have all provided and launched GP resource materials/kits as part of Responsible Gambling Awareness Week.

⁶⁷ See for example the Problem Gambling Professionals website <http://professionals.problemgambling.vic.gov.au>

⁶⁸ Problem Gambling Research and Treatment Centre (PGRTC) (2011) *Guideline for screening, assessment and treatment in problem gambling*. Clayton: Monash University p44

⁶⁹Ibid – for further information see Thomas, S; Jackson, A; Browning, C and Piterman, L. (2009) *A one item screening tool for problem gambling for use in primary care settings*. Melbourne, PGRTC.

Recent research by the South Australian Centre for Economic Studies (SACES) has also identified greater access to financial counselling support as important in assisting problem gamblers. This report notes that there is a serious lack of community knowledge about the availability of financial counselling advice.⁷⁰

Still other research projects have found that problem gambling may be interwoven with family violence suggesting that services operating in this health service sphere may also benefit from training and information on assisting problem gamblers.

The AGC supports the provision of integrated community support services across the public health spectrum.

Enabling greater and earlier identification opportunities and access to help services should be matter of priority given the complex array of interpersonal and intrapersonal health issues suffered by problem gamblers and their families.

Problem gambling services should be linked, at a minimum, to:

- Financial Counselling Services;
- General Practitioners;
- Mental Health Services;
- Alcohol and Drug Services; and
- Family Services.

5.3 Treatment options for problem gambling

As found by the Productivity Commission's 2010 review "client outcome data collected from gambling services show that the majority of people who seek formal help are better able to manage their gambling problems following counselling and treatment".⁷¹

Follow up of those having undergone treatment have found decreases in gambling (if not complete abstinence), reductions in scores on problem gambling screening instruments, a fall in gambling expenditures and improvements in measures for depression, anxiety and stress.⁷²

A recent Cochrane review undertaken by the Problem Gambling Research and Treatment Centre (PGRTC) has found the greatest empirical support for the short term efficacy of individual and group Cognitive Behavioural Therapy (CBT) treatments.⁷³

However the PGRTC review also found that little is known regarding the durability of CBT and even less evidence is available regarding the possible efficacy of other potentially helpful interventions.⁷⁴

Fulsome studies into problem gambling treatment should be high on the research agenda. As noted by the Commission in their discussion of this subject:

⁷⁰ South Australian Centre for Economic Studies (2011) Occasional Paper no 33: *Problem Gamblers and the Role of the Financial Sector*

⁷¹ Productivity Commission (2010) *Gambling* p7.33

⁷² See for example the Productivity Commission's discussion of treatment results reported by the University of Sydney Gambling Treatment Clinic, Hornsby Drug, Alcohol and Gambling Services and a longitudinal evaluation of the Victorian Gambler's Help Program at pp7.34-7.35

⁷³ Problem Gambling Research and Treatment Centre (2011) *Guideline for screening, assessment and treatment in problem gambling*. Clayton: Monash University

⁷⁴ Cowlislaw, Sean (2012) *Efficacy of psychological treatments for problem gambling: A Cochrane review of evidence*, Presentation to the 4th International Gambling Conference, Auckland, 22-24 February 2012 <<http://www.internationalgamblingconference.com/Uploads/PDF%20Documents/Powerpoints/Cowlislaw,%20Sean%20Review%20of%20Psychological%20Interventions.pdf>>

“Longitudinal research on clients and problem gamblers more generally could be expected to shed light on the effectiveness of counselling, natural recovery and relapse. Long term effectiveness is also critical in terms of assessing cost effectiveness. Further research is also needed to establish what clinical variables have an impact on treatment efficacy”.⁷⁵

Vexingly, a very limited proportion of those experiencing problems with gambling will seek formal counselling treatments for gambling problems.

The Productivity Commission suggested a help-seeking rate between 8-17% - a figure that accords with international evidence suggesting treatment seekers comprise only 6-15% of those experiencing problems with gambling.⁷⁶

The barriers to accessing formal counselling treatment reported throughout the research literature include denial, stigma, a lack of understanding as to what may be involved in counselling or a wish to deal with problems personally rather than, or prior to, seeking any formal help.

Given these issues there is a pressing need to explore not only how more problem gamblers may be encouraged to enter treatment but how treatment benefits may be extended to gamblers unwilling to participate in intensive or longer therapies.

Research shows that self-help measures rate highly with gamblers experiencing problems – especially as a first point of resource.

“There appears to be great potential for self-help measures to be a major tool in preventing gambling problems, minimising harm from gambling and assisting recovery. However, self-help gambling strategies have received minimal attention, and there is currently no evidence to support which types are efficacious and which are not.”⁷⁷

While some self-help options are already available in Australia through such sources as the national gambling help online website⁷⁸ the AGC suggests that the formulation, evaluation and funding of further brief interventions and self-help programs should be investigated as a priority.

⁷⁵ Productivity Commission (2010) *Gambling* p7.49

⁷⁶ Productivity Commission (2010) *Gambling* p7.3

⁷⁷ Hing, N; Nuske, E & Gainsbury, S (2011) *Gamblers at-risk and their help-seeking behaviour*, Gambling Research Australia

⁷⁸ See <http://www.gamblinghelponline.org.au>

6. Research

6.1 AGC comments in brief:

- The AGC concurs with the Productivity Commission’s call for the establishment of a dedicated National Gambling Research Centre for gambling policy, research and evaluation. (Productivity Commission Recommendation 18.3)
- The AGC believes such a centre should, at a minimum:
 - Coordinate a research store/agenda of direct national policy relevance;
 - Formulate clear guidelines, methodologies and processes to ensure all Australian gambling research is nationally consistent and of the highest academic standard;
 - Maintain up to date national data and statistics regarding gambling and problem gambling that is easily accessible to the public;
 - Collaborate with other public health research centres; and
 - Integrate knowledge and resources via a stakeholder advisory panel.

6.2 National co-ordination of the gambling research agenda

The gambling industries in Australia are large and varied. Over the years, research into gambling has seen rapid growth and a clear development of expertise as national and state/territory governments have facilitated the development of active and varied gambling research agendas.

However the governance structures for gambling research in Australia overlap, have differing levels and lack national coordination.

Over time there has been increasing difficulty in integrating and comparing research findings from different jurisdictions when variations exist in the focus, methodological approach, and target audience.⁷⁹

Many funded gambling studies in and across jurisdictions are small and are conducted as stand-alone ventures.

Further, the ongoing debate about gambling in Australia has been exacerbated by the absence of quality evaluative studies, appropriate benchmarking and peer review against established guidelines— a situation often compounded by the absence of a data-set of up to date, reliable statistics and information pertaining to the industry at a national level.

The AGC believes that there is potential benefit in combining gambling studies with other studies, (such as those in health and education), in order to be able to study larger and better samples and provide a comprehensive foundation to inform public health initiatives.

A solid empirical evidence base, one that is nationally co-ordinated, clearly structured, appropriately funded and that evidences the highest level of academic rigour while demonstrating clear policy relevance is an urgent requirement if gambling research in Australia is to keep a proper pulse on the outcomes of initiatives and policies already undertaken - while adequately informing policy makers of any likely best ‘next steps’.

⁷⁹ Delfabbro, P (2009) *A Review of Australian Gambling Research*, Gambling Research Australia, pp13-14.

6.3 Stakeholder partnerships in gambling research

In the opinion of the AGC stakeholder partnerships are integral to fostering a solid research agenda that incorporates evidence and learning about all forms of gambling, gamblers and the gambling industry.

Good examples of industry, government and research collaborative effort (for example in the pre-commitment trials and evaluations that have been held in Queensland and South Australia) already exist.

Advisory groups that represent tripartite stakeholder views are also evident in various jurisdictions throughout Australia and a similar stakeholder construction has provided input to the federal government on pre-commitment via the Ministerial Expert Advisory Group (MEAG).

This collaborative partnership approach should be extended to offer industry a seat at the table when determining a national research agenda.

The Productivity Commission's 2010 report, while clear about the potential for conflicts of interest in this area, also recognised that "involvement of industry could improve access to data and provide a clearer picture about gambler's behaviour, the commercial environment and other practical matters associated with policy change."⁸⁰

⁸⁰ Productivity Commission (2010) *Gambling* p18.23

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