



# TAB

Wong  
2/2/09

30 January 2009

Mr Robert Chappell  
Director  
Independent Gambling Authority  
PO Box 67  
RUNDLE MALL SA 5000

Dear Robert

## RE: INQUIRY INTO BARRING ARRANGEMENTS

Whilst SA TAB does not wish to present at the Public Hearing into Barring arrangements, SA TAB does wish to submit for the Authority's consideration the following.

SA TAB acknowledges and supports the stated objective of harm minimisation policies included in Section 3.4.1 of the IGA Guide for Participation, that is:

“the objective of harm minimisation policies is to address the negative impacts of particular activities while imposing minimal constraints upon the general public”

It is with this objective in mind that SA TAB makes the following comments in relation to the key issues of interest for the Inquiry into barring arrangements.

It is SA TAB's view that barring arrangements should be kept as simple as possible for those wishing to be excluded and those who are required to implement the exclusion. Accordingly, SA TAB supports the Minister's inquiry in response to the perception stated in Section 4.1.

Section 4.2.1 among other things, talks of simplifying barring arrangements, promoting consistency across different gambling types and ensuring they are flexible.

SA TAB would contend that whilst the consistency approach would seem logical, it does not consider the fact that gambling types are different and hence there are some differences that may necessitate varied barring arrangements. Factors such as :-

- Single venue versus multiple site operations
- Account based gambling versus cash based gambling
- Continuous play gambling versus break in play gambling
- Retail site layout and logistics variations.

### Key Issues

4.2.1 SA TAB notes and endorses the IGA stated objective that barring arrangements are “enforceable, practical and cost-effective”. It is essential that these three factors are utmost in any consideration of barring arrangements as this will assist in providing the most effective mechanism towards achieving the Authority's objectives.



#### 4.2.2 Expanding the availability of barring.

Whilst this aspect of the inquiry does not affect SA TAB, it would seem inconsistent that Racing Clubs and Bookmakers are not covered by barring arrangements.

4.2.3 A statewide involuntary barring scheme whilst notionally it may seem a complimentary measure to assist problem gamblers, it does bring with it some operational issues. A statewide involuntary barring would be difficult to enforce for several reasons, most of which is the ability of the gambling provider to access photo identification. On an individual site by site basis, barring a customer without having a photograph may be possible, but to effectively extend that to multiple venues is virtually impossible without photographic assistance.

4.2.4 The suggestion that a wider range of monitoring activities would assist in enforcing barring orders would seem to contradict the Authority's stated objective in 3.4.1 of the inquiry documents. Perimeter scanning and venue accounts would both produce significant constraints on the general public and the venue operations. Similarly, both of these "measures" would apply constraints on gambling product users, most of whom are not problem gamblers.

The "signing in" aspect of New South Wales clubs is not a measure put in place to assist problem gambling. This practice is a historic requirement of the Club Liquor License which restricts service to club members and guests who are appropriately "introduced" to the relevant Club, by a member. Additionally, it is only the visitor who is required to sign in, the member may enter alone without signing in. For this type of measure to be effective a club member would have to be required to sign in every time they attended the venue.

#### 4.2.5 Ancillary barring powers and duties.

SA TAB's current practise in relation to barred customers is to remove that persons details from all mailing lists, loyalty programs and account betting.

It is SA TAB's view that barring should be product specific and that should a person wish to be barred from using more than one gambling product, then the person requesting the barring should initiate multiple barring requests. It would decrease the effectiveness of barring to have a barring order apply across all gambling products as the number of barring notices would increase. This would make it more difficult for gambling venue staff to enforce relevant barring notices as there would also be a number of irrelevant barring notices. The irrelevant notices would simply make it more difficult for staff to implement a relevant barring notice as the number of notices would become unmanageable.

The simple answer to 4.2.5 is that the current system is adequate.

#### 4.2.6 Improvements to venue barring.

There should be no maximum period for venue barring. However, there should be a minimum. SA TAB's view is that there should be a six month minimum and that the term of the barring should be indefinite. It should be up to the barred customer to take some action to have the barring lifted. This would mean that the barred customer is required to make a conscious decision and then act accordingly. This would ensure that the barred customer is required to think about whether or not

their situation has improved enough for them to be “safely” involved in gambling.

A “cooling off” period of 3 days would allow a gambler to reconsider their initial action as being impulsive, without having a detrimental effect on the “self-help” process. A standard form for venue barring would be appropriate for single venue barring, but not necessarily so for situations where multiple venues are involved. However, SA TAB does not have a firm view on these two topics.

4.2.7 Alternative sanctions.

Forfeiture of winnings, whilst this may seem appropriate, it does not stop a person from gambling and losing. The objective should be to stop the gambler before they bet, not after.

4.2.8 Non criminal approach to self-exclusion.

SA TAB considers that some form of punitive action should be conferred on a person who breaches their barring order. If there is no penalty then there is a reduced incentive or motivation to comply with the barring.

4.2.9 No comment.

4.2.10 Harmonising barring processes.

All barring arrangements should be harmonised across legislation. This is particularly important where a gambling provider is covered by more than one piece of legislation.

Yours sincerely



**Grant Harrison**  
**General Manager**