



Independent Gambling Authority 2011 Code of Practice Review

An outline of the joint AHA | SA Gaming Care response

It is proposed to present a joint submission by the two organisations. This will eliminate duplication in areas of commonality. This document is intended as an overview of our more detailed joint presentation on the day.

The Australian Hotels Association (SA Branch) will be represented by Mr Ian Horne, and Gaming Care will be represented by Mr Wally Woehlert.

Both organisations are intending to address those matters identified by the Authority in 3.2 of the Guide for Participation which relate to the hotel industry only.

Submission overview

3.2.1. Gaming Care.

The Association, as part of the Review 2006 committed to the establishment and maintenance of Gaming Care. That commitment has been honoured and Gaming Care now has six full time field staff, one administration officer, and Executive Officer and a General Manager.

Gaming Care has met its reporting obligations to the Authority by providing statistical information and continues as a core function to provide support to the gaming staff in venues.

It is the contention of the Industry Association that the work undertaken by Gaming Care has resulted in achieving significant outcomes, namely:

- Increased compliance with Codes of Practice
- Increased referrals to gambling help services; and
- Increased understanding and cooperation between industry and gambling help services.

Gaming Care has provided each venue with a comprehensive policy and procedure manual which incorporates the code obligations. This manual sets out the obligations pursuant to the codes of practice, licence conditions and other statutory obligations

relating to responsible gambling. It is this document which underpins much of the work undertaken by Gaming Care and assists venues with their compliance obligations. In addition each visit by a Gaming Care officer involves a compliance component. Gaming Care officers engage with staff and provide an opportunity for staff to raise and discuss matters of concern that relate to problematic gambling behaviours identified and the venues' internal reporting and review of specific patron situation.

We will expand on the work and outcomes as part of our presentation.

3.2.3 Inducement to gamble

Our position is to maintain the status quo. The industry has adapted to the most recent changes and in our view there is no need to change.

3.2.5 Training

We agree training of venue staff is critical to addressing problematic gambling behaviour. We submit that the training course moderation is important to ensure that all training providers deliver appropriate training programs. The current process of relying on the Registered Training Organisation (RTO) process for the nationally recognised training courses is adequate, provided some assessment is undertaken by OLGC as to the accuracy of the material being presented.

The Authority is in the process of evaluating the advanced training course prescribed by the Act and mandated by the Code. It is in our view critical that this course be properly moderated to ensure that all training packages approved address the specific requirements of the State structure. The Authority, through the Code, requires the gambling provider to ensure that problem gambling training programs are regularly reviewed. The code then prescribes that where external training providers are utilised then the external training provider may satisfy the obligation imposed on the gambling provider by having the training audited, or alternatively the peak body may satisfy this requirement.

It is our view that the nationally recognised training program, which has an audit component, may be a useful mechanism to ensure that RTOs, who are approved by OLGC, might as part of that approval process, be required to provide the outcome of those audits to OLGC.

For training providers who deliver non nationally recognised training packages, in particular the advanced training envisaged by clause 10, as part of the recognition process by the Authority might be required to produce the result of annual audits,

rather than impose this obligation on the gambling provider. The gambling provider should be able to rely on satisfying the training obligations by engaging with a recognised trainer rather than having an obligation to require the training provider to have the training audited.

We do not support the Queensland training framework. It appears to us to be overly prescriptive and we do not see the benefit of such a process for this State.

3.2.6 Mandatory warning messages

As has been noted by the Productivity Commission, ***“The presence of warning signs and pamphlets is one thing, but for warnings to have any effect, people need to see them. Where a sign is placed, its size and how well it stands out are important.”*** (8.1 Productivity Commission Inquiry Report. (Vol 1 50, 26 February 2010,). Therefore having to include the condensed message on regulatory signs may well result in the message becoming stale. A proper review of the signage requirement, which should include the placement of appropriate warning signs in areas other than the gaming area is needed.

We do not support any change to the concept of rotating the expanded message and do not suggest any change to the concept. Compliance with the current requirement should be maintained, rather than imposing additional obligations. The focus should be does the warning message stand out, rather than is it on the sign or in the advertisement.

We do question the effectiveness of the condensed warning message on generic advertising signs away from licensed premises.

3.2.7 In-venue reporting of problem gamblers

Gaming Care supports the current process and continually reinforces the procedure with gaming staff. The two notable incidents referred to in the Guide for Participation are cause for concern but in our view not sufficient to warrant a change in the current procedures. Furthermore, Gaming Care’s work and the advanced training course, if approved in the form submitted reinforces the current process. It is our submission that the current process if complied with addresses the concerns raised.

3.2.8 Perimeter control

We do not support changes to the current obligation for venue staff to monitor and seek to prevent entry by patrons who have been barred. The introduction of further perimeter controls is not in our view warranted.

3.2.9 Mandatory breaks in play (pop up messaging)

We do not share the view that **“the technology to deliver mandatory breaks in play has been proven”**. In fact it is our understanding that there have been no studies completed post-implementation to gauge the effectiveness of this particular measure as a harm minimisation initiative.

There are also issues about the ability for existing gaming machines to provide this feature. We note the reference to this and other dynamic messaging referred to by the Productivity Commission and that this type of feature **“could be achieved at a relatively low cost if there is an agreement on a uniform national standard for displaying that information on new machines.”** [Productivity Commission Inquiry Report Vol 1 No 50, 26 February 2010 at 8.22]. We will therefore urge the Authority not to proceed with this proposal at this time.

3.2.12 Children’s play areas

While recognising the risks referred to in the Guide for Participation, we are simply not aware that this issue has arisen in this State. It is our contention that given that the Commissioner has very wide powers to impose conditions that any attempt by a licensee to establish children’s play areas in close proximity to gaming areas can be dealt with by the Commissioner. Likewise, we would suggest that the current clause 7 of the Responsible Gambling Code of Practice adequately deals with any incidents of minors being left unattended on premises while the parent or guardian is playing gaming machines.

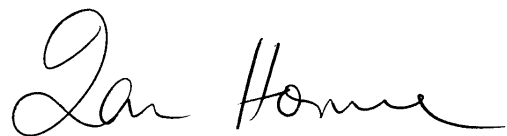
3.2.13 Cheques for winnings

We are not aware of any incident where the current procedures have resulted in adverse consequent for a patron. We see no reason to change the current procedures. However, if there is reason to consider a change we would request the Authority to provide an option for direct crediting to bank accounts via EFTPOS facilities where they are available in venues.

3.2.14 Obligations for staff welfare

We support this measure. Gaming Care has included this obligation in the Responsible Gambling Document and continues to reinforce the importance of this requirement in the venue workshops.

We look forward to expanding on this overview at the hearing on 4 and 5 October 2011.

A handwritten signature in black ink that reads "Ian Horne". The signature is written in a cursive style with a large initial 'I' and a long horizontal stroke at the end.

IAN HORNE

For and on behalf of the Australian Hotels Association (SA) and Gaming Care