

BREAK EVEN SERVICES SA

1st May 2006

Mr. Robert Chappell
Executive Director
Independent Gambling Authority
Level 4, 45 Grenfell Street
ADELAIDE SA 5000

Re: Regulatory Functions Review – May 2006

The Break Even Services of South Australia, (BESSA) in responding to the Regulatory Functions Review May 2006, decided that a consumer survey would be a beneficial element in considering the effectiveness of the Codes of Practice. When clients express their concerns about their gambling behavior they frequently refer to practices within the industry that we see are not compliant with the Codes of Practice currently in legislation.

The questions for inclusion in the Break Even Survey were agreed upon at a BESSA meeting and subsequently offered to all Break Even agencies to ask their clients. The survey comprised a total of eight questions, with six questions relating to the Codes Stage I and two questions relating to Stage II codes. (See Appendix A, Questionnaire Survey).

This survey was conducted over three weeks in the month of April and all questions related to the client's gambling behavior in the past twelve months. Clients were told that their answers were anonymous and that the original survey forms would be destroyed after collation. Clients were advised the survey was designed to provide 'a snapshot' of clients experiences about some of the practices occurring in a number of venues and in relation to the codes of practice.

A total of 79 clients completed the survey from six Break Even agencies including two country services. The results and comments are summarised below:

1. Have you been served alcohol at gaming machines?

It is evident that 35.4% of respondents have said that they have been served alcohol while at the gaming machine in the past twelve months. This is a significant number of clients reporting this particularly code in not being adhered to.

Research has shown that two standard drinks of alcohol double the likelihood of a person gambling more than they wanted to (Prof Mark Dickerson). This is certainly one of the reasons why the serving of no alcohol was included in the first stage of codes of practice and why agencies view this code as a priority.

2. Have you obtained credit and cash from a venue to gamble in the last 12 months?

7 clients, 8.8% reported that they were able to obtain either credit or cash while playing the pokies. Counsellors are aware of this practice and know it is vital that problem gamblers do not gain access to credit.

3. Have you continually gambled in order to accrue loyalty points?

17 clients, 21.5% of clients stated that their gambling behaviour was encouraged by the accrual of loyalty points.

5. Have you continued to gamble in order to enter a jackpot prize?

34 clients, 43% of clients stated that their gambling behavior was encouraged by the prospect of winning a jackpot or accruing loyalty points.

6. Have you played more than one machine at a time in the last 12 months?

37 clients, 46.8% of respondents stated that they had played more than one machine at a time in the past twelve months. This figure represents almost half of the total number of clients surveyed.

7. Have you gambled in a venue where you have been barred?

22 clients, 27.8% of clients surveyed stated they had gambled in venues from which they were barred. This is a significant number of clients. The survey was an anonymous which contributed to the trust from our clients in giving this information. It highlights the issue of barring and enforcement.

8. Have you gambled when under age?

7 clients, 8.8% stated they had gambled under the legal age limit. This raises the serious issue of youth gambling and agencies have reported an increase in the number of young people under the age of 20 years who are now accessing the services.

Discussion.

It is evident from the data above that there are some serious breaches of the current legislated codes of practice.

The following points reflect areas for further discussion and work.

- The need for more compliance staff from the Office of the Commissioner of Liquor and Gambling.
- The need for the hotels and clubs to take steps to prevent practices such as service of alcohol and credit.
- The need for further investigation in to the use of smart cards and other technology to enable barring to be effective.
- The need for more discussions between all stakeholders including the Industry, the Break Even Services of South Australia, The Office of the Commissioner of Liquor and Gambling, the Department of Families and Communities and the Independent Gambling Authority.

The outcome that BESSA would want is to see a united approach to supporting codes of practice with the consumer central to the discussion. We want to see all stakeholders demonstrating intrinsic concern for the gambling consumer and for the industry to not just adhere to practices because of enforcement threats. Discussions involving all stakeholders could consider resource issues and find a collaborative way to deal with the very real issue of problem gambling.

Comments on the IGA Review 2006 by representatives of Break Even Services SA.

The next section of this submission contains the views of the representatives from six agencies who were available to attend a meeting to discuss the Second stage codes. Because not all of the agencies were able to attend on the day we acknowledge the comments may not be representative of all of the member agencies.

Meeting held:	Tuesday 11 April 2004, 12:30-2:30pm
Venue:	Department for Families and Communities Level 4, Riverside Centre, North Terrace Adelaide
Attendees:	
Belle Cheney	Relationships Australia
Andrea Brebner	Uniting Care Wesley Bowden
Elvira Kovacs	Anglicare SA Salisbury
Eve Barratt	Lifeline SA
Michael McCabe	Nunkuwarrin Yunti of SA
Garry Raymond	Salvation Army
Thea Knill	Community Connect, Department for Families and Communities
CC:	Janet Firth, BESSA Network Coordinator

The information contained in this document is the expressed views of those Break Even Services present at the meeting and are in no way intended to be interpreted as the views of the entire BESSA Network nor the views of the Department for Families and Communities.

Overview of IGA Review 2006

The Independent Gambling Authority (IGA) is undertaking a review of the following:

- Advertising Codes of Practice
- Responsible Gambling Codes of Practice
- Game Approval Guidelines
- Gaming Machine Licensing Guidelines.

The Review provides an opportunity for stakeholders to consider the harm minimisation aspects of all of the IGA's Regulatory Functions. Submissions are invited and are due by Monday 1 May 2006. A public hearing is scheduled for 23 and 24 May 2006.

The following summarises of a discussion held between representatives of the Break Even Services of South Australia (BESSA) network on 11 April 2006, the focus of which is responding to items of the IGA Review within the *Advertising Codes of Practice* and the *Responsible Gambling Codes of Practice*.

a) Advertising Codes of Practice

General comments

- Break Even Services expressed support for the 'family focus' of the current campaign slogan 'think what you're gambling with', although there

was some debate around the need for a more straight forward approach. For example, some agencies support the direct approach that smoking campaigns are currently employing such as direct links to the effects of one's actions e.g. 'smoking causes cancer'.

- Break Even Services recommend that the advertising code include a requirement to include a responsible gambling message across all forms of gambling advertising and suggests that the IGA has a role in regulating this.

b) Responsible Gambling Codes of Practice

First stage issues:

4. (1) Gambling areas

- Regarding warning messages in gambling areas, Break Even Services report that helpline stickers on gaming machines are effective. However, there is general agreement that the current helpline stickers are too discreet, particularly as they are placed adjacent to flashing lights and noise, aimed at enticing people to gamble.
- Break Even Services support the call for a review of the helpline stickers. In such a review process, it is suggested that the feasibility of listing local service providers alongside the 1800 number also be investigated.

5. (1) Customer information and signage

- Regarding multilingual responsible gambling materials such as brochures in venues, Break Even Services generally agree that this form of promotion is useful. Break Even Services report anecdotally that problem gamblers presenting to their services have resourced brochures from gambling venues.

7. Children

- Break Even Services suggest that more prescriptive guidelines be included in the code, to guide a gambling provider's development of a children's protocol. In particular, Break Even Services suggest that:
 - A minimum level of staff training be specified in the code for educating staff on child protection processes in South Australia;
 - The duty of care from a gambling provider towards a patron's children is recognised;
 - The code should reinforce the position that any one can report suspected neglect of a child based upon *reasonable suspicion* and require a statement to that effect be included in all children's protocols developed under the code.
- There is overall support from Break Even Services to include of the requirement for a children's protocol across all gambling codes (SA TAB Code, Racing Clubs Code and Lotteries Code).

9. Self-exclusion facility

- Break Even Services report that self-exclusion of a patron from gambling venues can sometimes be counter-productive to getting a problem gambler the help they require if they are not previously linked to a counselling agency. Therefore, agencies support item 9.(3)(b) *provision for immediate referral to, or liaison with, a counselling agency*. However, it was noted that referrals to and liaison with Break Even Services will be much more effective and efficient if the gambling provider has a pre-existing relationship with the local counselling agency.
- Break Even Services report that the current barring process via the IGA has inhibited a number of their clients from self-exclusion due to the intense legal focus of the procedure and suggest that a review of the IGA's approach to self-exclusion be undertaken with a view to developing a more engaging method of self-exclusion.
- Break Even Services suggest that the fines imposed on a problem gambler for breaching the conditions of the self-exclusion order are not a significant disincentive. It was suggested instead that South Australia investigate the applicability of the New Zealand model whereby the gambling provider is fined for allowing access of a barred patron.
- Self-exclusion practices need to be mindful of the unique issues associated with particular groups of the population such as people from Aboriginal and Torres Strait Islander backgrounds, people from culturally and linguistically diverse backgrounds and people with disabilities, to ensure that the consequences of entering into such an agreement are wholly understood and agreed to.

Second stage issues:

Issue 5 Six hour break – common closing hours for gaming machine venues

- Break Even Services disagree with the current position of the IGA, not to regulate for a common six hour break. This is due to anecdotal evidence that suggests people tend to be more at risk of overspending on gaming machines during the early hours of the morning (2am-8am), when they are (a) more likely to be intoxicated or (b) in the case of someone suffering from a mental illness or disability, more likely to be unaccompanied.

Issue 6 Inducements and loyalty programs

- Break Even Services collectively support the prohibition of inducements to gamble on gaming machines (including formal loyalty programs) in South Australia. Agencies recommend that this be included as a standard across all codes.

Issue 8 Relationship with Break Even Services

- The resources required of metropolitan Break Even Services to engage with gambling establishments will be greater than rural agencies due to the greater number of venues in the metropolitan area.

- Rural agencies such as Lifeline South East indicate that relations between the gambling establishments and Break Even Services are largely successful, although the quantities of scale (i.e. numbers of establishments, staff etc) are markedly less in the rural versus metropolitan area. As such, a model for successful interactions between gambling establishments and Break Even Services may not necessarily translate from the rural to metropolitan setting.
- Break Even Services indicate conservative support for requiring gambling providers to form appropriate relationships with local gambling rehabilitation agencies. However, an overriding inhibiting factor is the uncertainty around the level of resources required of Break Even Services to engage in relationship building activities.
- Resource implications for Break Even Services may include:
 - Increased staff time allocated to liaison with gambling providers;
 - Increased costs associated with travelling to gambling venues (particularly for rural agencies and agencies operating on a regional basis);
 - Increased referrals from gambling venues placing additional strain on current operations.
- An overriding concern of Break Even Services is for the potential for a lack of return on their investment (of forming relationships with gambling providers). As such, clear outcomes, such as the number of referrals from a gambling provider, should be monitored so as to clearly justify resource inputs versus outcomes.
- Forming ‘appropriate relationships’ should be defined in the codes so that gambling providers are clear of their responsibilities. Break Even Services have defined what would be seen as an appropriate relationship from their perspective. It is recommended that the code mandate that gambling providers:
 - Have a clear understanding of the range of services available in their local area (i.e. what type of services are available, what is not available, who is the contact person etc);
 - Keep a record of these services for easy staff access and to take responsibility for updating this information annually;
 - Ensure clear protocols are developed and in place for arranging referral of a patron to a counselling agency, including staff education;
 - Ensure staff have a clear understanding and working knowledge of self-exclusion / barring procedures;
 - Have responsibility for ensuring resources such as gamblers help brochures, stickers and magnets are regularly replenished.
- It is suggested that regulatory measures are put in place for mandatory compliance of this section of the code. It is recommended that gambling providers be required by the IGA to demonstrate their compliance on a regular basis.
- Conversely, Break Even Services describe their role in the relationship with gambling providers, to:

- Respond to contact from gambling providers in a timely manner;
- Keep records of contact from gambling providers such as number of referrals, requests for information, invitations to attend staff meetings etc.
- Break Even Services recommend there be a requirement for the IGA to consult with the Department for Families and Communities on any administration or program resources required to support the relationship between gambling providers and Break Even Services.

Issue 16 - Recognition of the Casino host responsibility initiative

- Break Even Services support the inclusion of the role of the host responsibility initiative within the Casino codes. Agencies overwhelmingly report both positive and highly professional interactions with SkyCity host responsibility officers.

Further comment from other members of BESSA were raised at the network meeting held 3rd April, for inclusion in this submission and summarised as follows:

- members stated SkyCity is to be commended for the establishment and development of the Host Responsibility initiative. The staff have linked with the services on a regular basis for information exchanges; referred clients to the services and supported Break Even staff fully in engaging clients in the barring processes. The model provides a good example of how the Break Even Services can work effectively with industry.
- members raised concerns that the whilst there is broad support for services engaging with industry, the reality is the services currently have little or no capacity to meet any additional demand from industry. The agencies are awaiting further discussion with the Community Connect Branch regarding funding agreements and levels of funding beyond June 2006. Any requirement of services to work with industry on social impact studies, training with industry staff, and travelling to and from individual hotels and clubs, will require increased resources for all agencies.
- members support the development of working relationships with industry to effect greater harm minimisation, however, we recommend the IGA instigate a series of 'round table discussions' with representatives from industry to address the specifics of how these working relationships can translate into positive, achievable outcomes.
- Some rural areas, the South East in particular, have developed strong relationships with individual hotels and clubs with positive outcomes for clients and the general community. However, more discussion is necessary as to how metropolitan agencies and industry can replicate, if at all, this level of engagement. Again, further discussion is welcomed as to how this can be achieved.
- Members have raised concerned about barring systems and report clients are often confused about the self exclusion options available in respect of the IGA's requirements versus the Office of the Commissioner for Liquor and Gambling

and suggest one regulator take responsibility for self exclusion and barring policy and protocols.

- Members have reported the difficulties several gaming staff have highlighted in the course of the barring processes. Photographs of clients may have been taken from their drivers licenses and therefore up to 10 years old. People may have changed hair styles, certainly may look older and identification of barred clients make the process that more difficult. Quality of photographs is another issue. Introduction of an electronic process incorporating computerised photographs and details can be networked in hotels and clubs. If networking is considered too expensive, stand alone systems can sustain documentation rather than some current practices with details and photos placed on pin boards in hotel passageways or offices.

The Break Even Services welcome this opportunity to comment on codes of practice and endorse a range of views put forward by the Heads of Churches Task Force and individual agencies. I look forward to presenting the submission at the Hearings on the 23rd and 24th May.

Regards,

Janet Firth
Chair, Break Even Services SA

Questions for IGA submission April 2006

	Yes
1. Have you been served alcohol at gaming machines?	28
2. Have you obtained credit from a venue to gamble?	7
3. Have venue staff assisted you in obtaining cash so that you can gamble?	7
4. Have you continually gambled in order to accrue loyalty points?	17
5. Have you continued to gamble in order to enter a jackpot prize?	34
6. Have you played more than one machine at a time in the last 12 months?	37
7. Have you entered a venue from which you are barred to gamble?	22
8. Have you gambled when under age?	7
total clients	79
Pt Pirie, Salvation Army, Lifeline, RASA Anglicare SA UCW Adelaide	