



**Duty Of Care**

**Duty of Care**  
**Submission**  
**To**  
**Independent Gambling Authority**  
**Review 2006**

**Duty Of Care  
Incorporated**

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**Introduction**



Duty of Care Incorporated (Duty of Care) is grateful for the opportunity to make a submission to the 2006 Review.

Sue Pinkerton, national Secretary and South Australian representative of Duty of Care, problem gambling research consultant and former gambling machine addict<sup>1</sup>, would welcome the opportunity to speak to our submission and respond to any questions the Authority may have regarding the submission during the public hearings to be held at the Adelaide Convention Centre on May 23 and 24 2006.

Duty of Care is a national, non-profit consumer protection association representing gaming machine consumers and their families. Duty of Care was founded in January of 2005 by three women who had first hand experience of the harmful financial, social and psychological consequences of excessive access to gambling machines. We currently have 300 members, (all of whom have been harmed in some way by gambling machine addiction).

Duty of Care's mission is simple.

We encourage state governments to remove gambling machines by lobbying ministers and challenging both current and future legislation that allows gambling machines (and therefore gambling machine addiction) to continue harming the people of Australia financially, psychologically and emotionally.

We attempt to empower and self-actualise gambling machine consumers as a defined community consumer group with clearly defined and understood consumer rights and responsibilities.

Through regular group meetings, newsletters and easily accessible information to consumers and the community, we educate, support, represent and vocalise the wishes of the public in relation to consumer rights surrounding gambling machines.

This submission will address various aspects of the following;

- 1. Advertising Codes of Practice**
- 2. Responsible Gambling Codes of Practice**
- 3. Game Approval Guidelines**
- 4. Gaming Machine Licensing Guidelines**

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<sup>1</sup> Duty of Care discourage the use of the term "gaming" – for each one of our members, and for the estimated 300,000 Australians personally and negatively impacted by these most cognitively manipulative and addictive machines, gambling is NOT a game. In this submission, any reference to gambling machines can henceforth be taken to indicate, what others call "poker machines" or "gaming machines".

## 1. Advertising Codes of Practice

As gambling machine consumers who have experienced first hand the devastating consequences of gaming machine addiction, we hold the position that there should be no advertising of gambling machines or gambling machine venues. It is our contention that ALL advertising of gambling venues is purpose designed to entice people to gamble. It is as rare for gambling venues these days to advertise social activities that are not in anyway associated with gambling as it is for them to not mention that gambling machines are available on the premises. Problem gamblers we speak with consistently report that hearing advertisements for gambling venues on the radio, seeing them on television or in newspapers or seeing “pokies” signs outside venues, triggers in them an intense urge to gamble.

While we acknowledge that hotels and clubs have a right to advertise their businesses, and that many advertisements and external signs are not “explicitly or exclusively directed at vulnerable populations or problem gamblers in recovery” as required under the Advertising Codes of Practice, advertising and external signage still has a profound - and negative - effect on problem gamblers.

Duty of Care are deeply concerned that many radio and newspaper advertisements of gambling machines venues fail to comply with the advertising codes of practice. After one recent advertisement for a sporting club was aired on radio, we received numerous calls from problem gamblers asking whether the advertisements enticement to listeners to “visit the gaming room and “share the prize” was ‘legal’.

In the April 19 edition of the News Review messenger (pg 26), one venues advertisement contained the words, “33 machines, New games, Daily promotions<sup>2</sup>” beside a stylized depiction of a pharaoh. While ostensibly promoting the name of the gambling room (Pharaohs) the depiction of the Pharaoh symbol and the thought of participating in one of the venues “daily promotions” was a major trigger for one

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<sup>2</sup> Various known as “lucky ticket draws”, “chocolate wheel draws”, happy hour promotions” and other aliases.

problem gambler whose 'favourite' machine had the same image on it. As for the advertising of "Daily Promotions", we wonder why the appearance of the word "promotion" alongside the depiction of a symbol that appears as art of the artwork of a particular gambling machine did not evoke an immediate response – and censure – from both the Office of the Liquor and Gambling Commissioner (OLGC) and the Independent Gambling Authority (IGA)? Any regular player of gambling machines (one in four of whom become problem gamblers<sup>3</sup>) knows what "daily promotions" are, what they clearly promote and that participation requires people to gamble on gambling machines! Later in our submission we will address the issue of "daily promotions", but for now we suggest greater vigilance on behalf of the authorities and larger fines for venues owners who so blatantly flout the law.

In all instances, callers were referred to the OLGC or the IGA and asked to report their concerns to these bodies. Most felt intimidated at the thought of doing so, feeling that they would be called upon to write a formal letter of complaint. Subsequently callers were asked to call the office of Nick Xenophon - most were only too happy to do so.

Duty of Care would like to suggest that the OLGC and/or the IGA establish a "complaints line" (similar to the State Bank's Crime Stoppers line) to take complaints anonymously from gambling consumers about gambling advertising, service provision and breeches of the codes of conduct.

Duty of Care are concerned that restrictions on radio advertising of gambling venues (i.e. between 8.30am and 6am Monday to Friday for radio and between 4pm and 7.30pm for television) are inadequate. Of particular concern is the fact that advertisements for gambling venues are permitted on radio during peak times that children are being driven to and from school. Apart from the issue of children being exposed to such advertisements, for mothers who are also problem gamblers, hearing advertisements for gambling venues on their car radios while driving their children to

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<sup>3</sup> Dickerson, Mark. 2004 "Measurement and modelling of impaired control: implications for policy" presented at Insight Nova Scotia. Available online at, <http://www.nsgamingfoundation.org/main/presentations/Professor%20Mark%20Dickerson.pdf>

school very often triggers them to drop their children off at school or home and to drive straight to the nearest gambling venue.

Duty of Care request that should the Authority decide not to prohibit all advertising of gambling venues, that all advertising of gambling venues on both radio and television be prohibited between the hours of 6am and 9.30am, Monday to Friday and between 2.30pm and 8pm each day to reduce exposure of children and mothers who are problem gamblers to advertisements of gambling venues.

### 1. (a) Mandatory warnings in advertising.

**Warning – “A means for alerting or informing a user of a product, machine, process or environmental condition about hazards associated with its use, adverse consequences of improper use, and ways for avoiding adverse consequences”<sup>4</sup>.**

Duty of Care strongly objects to the use of the phrase, “Gamble Responsibly” on or following advertising of gambling products and services. It is our contention that the phrase “gamble responsibly” is better defined as an instruction rather than a warning. For gamblers from non-English speaking backgrounds (NESB), the phrase “gamble responsibly” is as confusing as it is difficult to explain. As one gambler from Europe I spoke to recently asked, “What means this - gamble responsibly?” The phrase “gamble responsibly” does not alert consumers to the potential dangers of gambling excessively, it does not inform consumers of gambling products of how much gambling is too much gambling, and it does not inform gamblers of the comparative greater addictiveness of some gambling products compared to others.

We suggest that mandatory warnings in gambling advertising follow a similar format to that used on tobacco products – i.e. that all warnings make a statement about the negative, long-term consequences of indulging in the activity on a regular basis.

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<sup>4</sup> [http://www.hfeconsulting.com/Expert\\_Witness/GlossaryStoZ.html](http://www.hfeconsulting.com/Expert_Witness/GlossaryStoZ.html)

We suggest that all advertising of gambling products include one of the following warning statements (or something of a similar nature);

- “Gambling can be addictive”
- “Gambling can harm your relationships”
- “Gambling can harm your finances”
- “Gambling can cause mental illness”
- “Gambling can lead to depression”
- “One in four regular players of gambling machines develops gambling problems”

## 2. Responsible Gambling Codes of Practice

### 2. (a) On and in-venue signage.

As stated earlier, Duty of Care is of the opinion that all advertising of gambling venue should be disallowed. This includes external “Pokies” signs. At the very least external signs should not be electronically illuminated or brightly coloured and any sign allowed should include a mandatory warning in lettering of equal size to that of the lettering advertising the presence of poker machines.

As people who have experienced first hand the difficulties of working out whether or not our gambling had become problematic, Duty of Care request that a list of “indicators of problem gambling” (as taught to gambling room staff in some casino training programs<sup>5</sup>) be posted on the wall in all gambling rooms, in male and female toilets of gambling venues, and on all entrance doors to gambling rooms. The list should include at least ten items that are observable behaviours by which gambling room staff are able to ascertain which patrons are problem gamblers and which are not.

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<sup>5</sup> Christchurch Casinos Limited, 2004 “*Policy for identifying problem gamblers*”, pg 8  
<http://www.chchcasino.co.nz/CasinoInformation/PGPolicy04.pdf>

For example, the sign could read,

“A problem gambler is one who;

- a. Always gambles alone and does not socialize while gambling,
- b. Makes frequent trips to the ATM during gambling sessions
- c. Gambles until their last dollar is gone
- d. Gambles ‘x’ times a week – every week
- e. Becomes verbally or physically aggressive when losing
- f. Exhibits poor standards of dress and/or hygiene

And be followed by the instruction, “if you have these signs of problem gambling, please speak to our staff who can refer you to your nearest problem gambling help service”.

The advantage of sign informing people of the overt signs that a person’s gambling patterns have dropped from ‘social’ to ‘problematic’ cannot be understated. Many problem gamblers are too embarrassed to ask and the 20 questions used to establish whether or not an individual has a gambling problem require clear thinking subjective responses from people who are often incapable of thinking clearly due to sleep deprivation and excessive stress brought on by the consequences of excessive gambling.

Duty of Care suggest that the above signage where posted on the entrance doors to gambling rooms should be written in large font and cover at least half the size of the door. It should also include - for the benefit of people from non-English speaking backgrounds - a message explaining that a copy of the indicators of problem gambling (printed in their own language) is available from the venue staff.

## **2. (b) Mandatory Breaks in Play.**

While not technical experts on gambling machine programming, Duty of Care are aware of the availability – and use of – pop-up messages on gambling machines in

Nova Scotia.<sup>6</sup> In our experience breaks in play will allow gamblers to step out of the ‘zone’ – the trance state wherein gamblers react unconsciously to the gambling stimulus before them – and become conscious of the consequences of continuing. Should the IGA consider mandatory breaks in play, Duty of Care recommends that the system used should,

- i. Stop all machines from being played for a period of at least three minutes after each 30 minute periods of continuous use
- ii. Stop the player from collecting any coins they may have in the machine at the end of the 30 minutes (this facility and the requirement that players not be allowed to play more than one machine at a time - ensures that players do not move onto another machine thereby avoiding the three minute lock out)
- iii. Employ the use of pop-up messages that inform the player of their net win/loss to date
- iv. Inform the gambler of their current rate of loss per hour
- v. Ask the gambler if they wish to continue gambling or ‘cash out’ after the end of the lock out period.

## **2. (c) Screening of sights and sounds of gambling**

In discussions held with problem gamblers, family members of problem gamblers, gambling and non-gambling members of the public on issues related to the actions of venue owners/operators and how they lure people into gambling rooms, Duty of Care are constantly told of children being attracted by the noise emanating from the machines standing at the entrance of gambling rooms and of dining adults irritation at having their dining experience intruded upon by the sounds or gambling machine jingles.

While we accept that it is not the intention of venue owners/operators to attract children by having glass walls and doors (or worse, no door and only half a wall)

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<sup>6</sup> Tracy Schrans, Jennifer Grace & Tony Schellinck, 2004 “*Nova Scotia Video Lottery Responsible Gaming Features Evaluation*”  
<http://www.gamingcorp.ns.ca/pdf/2003-NS-VL-RGF-Nov9-2004.pdf>

dividing gambling areas from social areas of venues, the reality is that children are attracted to (and able to observe) adults engaged in gambling activities. It is equally true that most people in South Australia do not believe children should have access to or observe gambling in action.

Further, problem gamblers in recovery decry the fact that they cannot visit and socialize in clubs and hotels without risk of having their urge to gamble being triggered. Without doubt, effective screening of gambling areas would lead many more former problem gamblers to socialize in healthy ways in hotels and clubs. The reliance of hotels and clubs on gambling machines to make their businesses profitable is destroying Australian pub and club culture that once used to provide a place for members of communities to meet and get to know each other.

In the guidelines for making submissions<sup>7</sup>, the point is made that submissions to date have not adequately dealt with how this (the screening of sights and sounds of gambling) would be done. Without making too strong a point on the issue, sound proofing gambling areas and totally separating them in an acoustic/visual manner from other areas within hotels and clubs can be done for less cost than the current practice of putting in plate glass partitions. As far as we can ascertain there is no regulatory impediment to adding a wall inside an existing building, only in removing or interfering with weight bearing walls. As such, there is no reason for venues to refuse to add a floor to ceiling, gyprock walls filled with some soundproof material between gambling rooms and all other areas of hotels, clubs and casinos. By doing so, social activities being conducted in a hotel or club will not have to compete with the noise of gambling machines, problem gamblers will be able to rebuild their social connectedness and children will not be exposed to gambling at an age where they cannot comprehend the social devastation excessive gambling can cause.

## **2. (d) Six hour break – common closing hours for gaming machine venues**

While Duty of Care acknowledge the Authority's inclination to accept the gambling industries claims that they will not seek to stagger their opening hours to provide 24

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<sup>7</sup> IGA, Review 2006, Starting point for discussion, Issue 4, pg 29  
<http://www.iga.sa.gov.au/pdf/research/IGA-Guide-Review-Final.pdf>

hour gambling, the experiences of our members is that irrespective of the declared intention of gambling venue owners/operators that there is no collusion between them to provide a 24 hour gambling experience, 24 hour gambling is facilitated by the propensity of gambling venues to stagger opening and closing times of their hotels and clubs.

Both our own experiences as former gambling machine gamblers and those of the problem gamblers we speak with lead us to the conclusion that the majority of patrons in gambling rooms after midnight are problem gamblers and that most are desperately chasing their day's losses at that stage. When the gamblers 'favoured' venue closes, many patrons drive straight to the nearest venue that is still open in hope that their luck will turn or that the near by venue's gambling machines will be paying out more frequently. The sudden influx of patrons to gambling rooms open until 3am and 5am just after 1 am and 3am when nearby venues close is testament to the problems of staggered closing times. One of the authors of this submission has personally witnessed a 'convoy' of 20 vehicles leave a Salisbury North venue at 3am when it closed and drive straight to a Salisbury venue that closes at 5am.

Further, while conducting research into venue practices in early hours of the morning, we have heard gambling room staff of a venue that closes at 1am, thank patrons for visiting their venue and "remind" them that a near by venue is open until 5am. When the 'near by' venue closes at 5am, patrons are again thanked for visiting the venue and "reminded" that the earlier closing venue is open from 7am. This indicates very clearly the tendency of gambling venue operators to act irresponsibly in order to "share the profits" that can be derived from problem gamblers chasing their losses while at the same time, encouraging loss chasing among problem gamblers.

None of the gamblers we speak with can report having seen an official from the OLG or IGA in a venue after hours, nor have we been able to find any evidence of gambling venues having been fined for colluding in the encouragement of gamblers to chase losses thus venues can continue to collude to share the profits derived from the desperation of problem gamblers without risk of fines or mandatory closing times being introduced.

Duty of Care strongly supports the introduction of common closing of gambling rooms in all gambling venues across South Australia. Due to the propensity of many mothers of school aged children who are also problem gamblers to drop their children at school and drive straight to a gambling venue, we ask that gambling rooms not be permitted to open between 1.30 am and 9.30 am. This will encourage many problem gambling mothers to do “something” to fill in the time between dropping their children at school and venues opening – that something that may engage their attentions enough that they do not end up gambling that day.

The 1.30 am closing time is suggested because research conducted by Nina Littman-Sharp<sup>8</sup> showed that chronic lack of sleep (associated with poor judgment, depression, impulsivity etc) is common among problem gamblers caught in a seemingly never ending cycle of working long hours during the day and spending even longer hours gambling during the evening/night.

The industry’s often heard argument that early gambling room closing times will not allow shift workers access to “entertainment opportunities”, shows a singular lack of understanding of the sleep/wake/social habits of shift workers. Having worked rotating shift for many years, one of the authors of this submission can safely say that most shift workers socialise before work, not late at night or after work (i.e. they seek “entertainment” opportunities during the day, not at the end of a long afternoon/nights work).

## **2. (e) Inducements and loyalty programs**

All gambling related harm derives from – and is intimately associated with - excessive monetary loss. Where excessive spending on gambling machines is discouraged - or where gamblers are prevented from spending excessive amounts on gambling products – gambling related harm and “problem gambling” will not occur.

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<sup>8</sup> Littman-Sharp, Nina. “*Gambling, Fatigue and Drowsy Driving*” Presented at the 17th National Conference on Problem Gambling. June 20, 2003.  
[http://www.css.to/sleep/gambling\\_and\\_fatigue.ppt](http://www.css.to/sleep/gambling_and_fatigue.ppt)

Duty of Care recommend that the IGA institute an immediate prohibition of “competitions” (e.g. the aforementioned “Daily Promotions”<sup>9</sup>) that require gambling machine consumers to “spin up” various winning combinations or dollar amounts on a poker machine in order to enter into a draw for alcohol, cheap meals, and/or money. Further the requirement that patrons of some gambling venues, “change \$20 notes into pokies coin” for the chance to enter weekly/monthly draws for large monetary prizes clearly contravenes the licensing requirements that require “licensed business to conduct those businesses in a responsible manner so as to minimise the harm caused by gambling”.

Duty of Care have no objection to hotels or licensed clubs holding raffles, chocolate wheels, lucky envelope competitions etc where patrons are invited to purchase tickets in the draw – we are not anti-gambling - however we are opposed to gambling venues holding “promotional” events that require participant to gamble on gambling machines in order to enter other competitions, raffles, chocolate wheels etc.

At best “promotional events” – which occur up to four times a day in some venues - encourages individual gamblers to play a gambling machine in order to have an opportunity to win what is often a significant amount of money. Commonly it induces gambling machine gamblers to increase their rate of betting in order to maximize their chances of winning the prize and at worst it results in gamblers being “inadvertently rewarded” for betting more than one credit per line – something they may not do without the possibility of winning \$100, \$500 or even, \$1000 being offered to them.

Duty of Care strongly objects to the “Daily Promotions” practice and recommends that all such enticements be prohibited.

Duty of Care recommends that all loyalty programs attached to gambling machines be disallowed. This recommendation is based upon the fact that loyalty programs are an inducement to gamble and encourage the perception held by problem and non-problem gamblers alike that, “even when I am losing on the machines, I am winning money on my J-card”.

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<sup>9</sup> See page 3 of this submission

The issue of venues continuing to send out promotional material and special deals to problem gamblers who self-excluded - as well as those who have asked to not receive such material - is of major concern to Duty of Care. Receiving promotional materials from venues participating in loyalty card systems often triggers intense gambling urges in people who are in the early stages of recovery as they have not yet rediscovered that birthdays and special events do not have to be 'celebrated' by gambling.

Should the Authority decide to allow loyalty programs to remain in operation, Duty of Care asks that all such program operators be required to;

- i. Mail to all loyalty cardholders, monthly statements of gambling activity during the previous month. The monthly statement should include a list of venues visited, total monies lost/won in each venue, a bar graph showing totals won/lost in each month of the previous year and a forward projection of annual win/loss that can be expected if the customer continues to lose/win at the daily rate they have in the previous month.
- ii. Cancel the cards of all members who request exclusion from any gambling venue in the state and remove from any loyalty card/ venue promotion database the cardholders contact details. Significant fines (including suspension of a gaming machine operators license for a period of not less than three months) should be imposed upon venue owners/operators who fail to comply with this directive

## **2. (f) Reporting of potential problem gamblers**

In all conversations Duty of Care have with problem gamblers, not one has reported being approached by venue staff and referred to help services despite the assurances of gambling venue owners and operators that they are willing and trained to approach people identified as problem gamblers by their behaviours. On the other hand reports of similar experiences to that of a middle-aged woman who shall henceforth be known as "Mary" are all too common.

In one session of gambling at an early opening Adelaide suburb venue in late 2003, Mary spent in excess of \$1900 dollars in a single one and a half hour session that took place between 7.30am and 9am. She arrived in tears and deeply distressed at the home of the South Australian representative of Duty of Care shortly after 9am one morning, holding in her hand some 15 ATM withdrawal receipts. Examination of the receipts – all made from one machine on the day in question – showed that Mary had, between 7.30 and approximately 9 am that morning, made one trip to the ATM in a nearby gambling venue every 6 minutes. She reported that after making approximately five trips in a short period of time to the venues cashier to change notes into coin, she became so concerned that the gambling room staff might realize that she was a problem gambler and refuse to let her try to “win her money back”, that she converted the remaining notes she withdrew from the ATM at one of the three automated coin dispensing machines in the gambling room.

Mary reported that when she arrived at the venue at 7.30am, she was one of just three people in it – the other two were employees of the venue. Given that Mary was the ONLY person in the venue for the first half hour she was gambling (and one of ten by the time she left at approximately 9am), her frequent trips to the ATM to withdraw money MUST have been noticed by the venue’s staff...the sound of coins dropping from the coin dispensing machines MUST have been heard and the enormous amount of money Mary was spending that morning MUST have been evident, yet not once did the staff approach Mary or suggest that she go home. Further Mary was a frequent early morning visitor to the venue in question – the staff generally greeted her on her arrival, knew her name and her address as she had registered as a loyalty club member at the venue concerned.

While the aforementioned situation is one of the most blatant indicators that gambling venue policies with regards to the identification, approach and referral of potential problem gamblers to counselling services are NOT being followed, it is by no means uncommon. All founding members of Duty of Care have experienced situations in their gambling ‘careers’ where they have gambled and lost excessive amounts money in sparsely peopled venues, watched by gambling room staff without intervention.

Merely requiring that gambling venues have an internal policy that venue staff should report to management patrons who “appear to have a gambling problem” is grossly inadequate. There also needs to be negative consequences in the form of large fines, revocation and/or suspension of licenses for gambling venue owners, operators and staff who do **not** take action when problem gambling behaviours are observed in gambling room patrons. The aforementioned “complaints line”<sup>10</sup> should be advertised by the IGA or OLGC as an appropriate place for gambling room patrons to report incidences of problem gambling behaviours in patrons that are not dealt with by gambling room staff or managers of gambling venues according to the requirements of the mandatory Codes of Practice.

Duty of Care also suggest that the Authority employ an inspector well versed in observable signs of problem gambling to visit gambling rooms unannounced at all times of the day or night to check that readily identifiable problem gamblers are being reported to management by gambling room staff, that managers are approaching patrons so identified by gambling room staff, and that referrals of problem gamblers to problem gambling help services are being made. Significant fines (including suspension of relevant licenses) should be imposed;

- i. On staff who do not report patrons displaying readily identifiable problem gambling behaviours to managers
- ii. Managers that do not follow up reports of problem gambling behaviours

**2. (g) Automated coin dispensing machines, automatic teller machines (ATM’s) and cheque cashing facilities**

Duty of Care acknowledges and thanks Nick Xenophon MLC for persistently raising the issue of automated coin dispensing machines, ATM’s and cheque cashing facilities in gambling venues.

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<sup>10</sup> See page 4 of this submission

Duty of Care's position is that the removal of ATM's from gambling venues should occur in all gambling venues except those venues that are located a minimum fifty-kilometer drive from the nearest ATM or EFTPOS facility.

Along with a significant majority of current and former problem gamblers, their families and counsellors, Duty of Care is of the opinion that other than the strategy of permanently switching off of all gambling machines in South Australia, the removal of ATM's from gambling venues will prove to be the "most effective strategy for reducing problem gambling"<sup>11</sup>. The third most effective initiative for reducing gambling related harms is, in our considered opinion, the removal of coin dispensing machines.

As people who have chased gambling machine losses, we can attest to the propensity of problem gamblers to make multiple trips to ATM's to withdraw more money from rapidly dwindling accounts and subsequently cashing more notes into coin than we could reasonably afford. While many of those who argue against the removal of ATM's from gambling venues point to the irrationality of gamblers attempting to chase their losses by continuing to gamble, the reality of problem gambling is that having already put more money than they can afford to lose into a gambling machine, problem gamblers believe that the option of walking away from the machine they have already put too much money into means only that thereafter there is a 100% certainty that their losses will not be recouped. Continuing to gamble – even if it means losing more money – comes with a flicker of hope that a win will occur that 'saves the day'.

If gamblers are forced to leave a machine they have put slightly more money than they intended into for longer than three minutes to drive to access more money, there is a distinct possibility they will be able to stay away before the money they have lost becomes too great. While the opportunity exists for them "reserve" the machine they have put \$50, \$100, \$500 or more into, walk to an ATM within the venue, withdraw

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<sup>11</sup> New Focus Research Pty Ltd, 2005, *"The Experiences of Problem Gamblers, Their Loved Ones and Service Providers - Round 3"*, pg 52  
[http://www.justice.vic.gov.au/CA256902000FE154/Lookup/GRP\\_Reports\\_Files6/\\$file/LovedOnesRd3.pdf](http://www.justice.vic.gov.au/CA256902000FE154/Lookup/GRP_Reports_Files6/$file/LovedOnesRd3.pdf),

more money and return to the machine before the three minute reserve limit expires, many problem gamblers will continue to chase their losses.

On the subject of automated coin dispensing machines, it is Duty of Care's recommendation that venues where gambling machines are located be prohibited from operating such machines. We make this recommendation because the problem gamblers we speak with all express the same sense of shame/embarrassment that "Mary"<sup>12</sup> did over having to face a gambling room cashier to change notes into coins. Even in the absence of any disapproving looks from gambling room cashiers or any hint that these men and women are aware that the frequent converting of large numbers of notes into coin is a strong indicator of problem gambling, the fear of being judged by others to be a problem gambler is often enough for a problem gambler to stop gambling once they have made three or four trips to the cashier in a single session.

If minimizing gambling related harm and reducing the numbers of people who develop gambling related problems is the primary purpose of the regulation of gambling venues, then both ATM's and automated coin dispensing machines must be removed from gambling rooms as soon as possible. While Duty of Care still hold the belief that gambling machines are too entrapping, too addictive and purposely designed to facilitate prolonged play<sup>13</sup>, erode conscious decision making by any one who gambles on them regularly<sup>14</sup>, for prolonged periods of time per session, we agree that strategies such as removing ATM's and automated coin dispensing machines from gambling venues and requiring gamblers to face another person when they wish to convert notes into coin are likely to be effective strategies for reducing problem gambling and minimizing the harms that are an all too frequent outcome of the provision of what is ultimately an unsafe product.

## **2. (h) Facial recognition and smart card technologies**

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<sup>12</sup> See page 10 of this submission

<sup>13</sup> Rivlin, Gary. The New York Times, May 9, 2004 "*The Tug of the Newfangled Slot Machines*" <http://www.nytimes.com/2004/05/09/magazine/09SLOTS.html?ei=5070&en=58f580fa02671ab1&ex=1146542400&adxnlnl=1&adxnlnx=1146436738-Ms8VjKcSAm8ikTQyTsoUwQ>

<sup>14</sup> Dickerson, Mark & O'Connor, John. 2006, "*Gambling as an Addictive Behaviour: Impaired Control, Harm Minimisation, Treatment and Prevention*". Cambridge University Press

Duty of Care fully concur with the opinion and evidence regarding the value of introducing smart card technologies expressed by Sue Pinkerton (Problem Gambling Research Consultant and Secretary of Duty of Care) in her submission to the IGA's Inquiry into Smart Card Technologies<sup>15</sup> in 2005.

### 3. Game Approval Guidelines

In agreement with Duty of Care's submission to the "Review of the Electronic Gambling Machine, Club Keno and Wagering Licences and Funding Arrangements for the Racing Industry Post 2012", the following changes to gambling machine operations are suggested for inclusion in all new gambling machine game designs submitted for approval to the OLG. All new machines must:

- i. Allow for the introduction of technologies such as smart cards, precommitment systems etc that enable players to exercise more choice, incur fewer losses and to retain greater control of their gambling spending.
- ii. Include independent longitudinal research showing that the games/machines to be introduced will not increase the level of problem gambling.
- iii. Have a preset maximum loss limit of \$100/hour (machines intended for operation by patrons of Sky City Casino 'high roller room' to be excluded from this pre-set maximum loss limit).
- iv. Have a betting cycle 50% slower than current machines licensed to operate in South Australia
- v. Allow gamblers to bet on no more than five lines at any one time (gambling machines approved for operations in the high roller room within Sky City Casino shall allow a maximum of 10 lines to be bet on in any one bet).
- vi. Allow a maximum bet limit of \$1 per button push on all machines except those in high roller rooms within Sky City Casino where the maximum bet limit will be \$250 per button push

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<sup>15</sup> Pinkerton, Sue. 2005 "Submission to the Independent Gambling Authorities Inquiry into Smart Card Technologies". <http://www.iga.sa.gov.au/pubcons/smartercd/Pinkerton%20submission.pdf>

- vii. Allow gamblers to bet no more than five credits per line except those in high roller rooms within Sky City Casino where the maximum credit limit per line will be 25
- viii. Have the capability of allowing for game programs that include pop-up screens and breaks in play every 30 minutes
- ix. Do not include a double-or-nothing feature

#### **4. Gaming Machine Licensing Guidelines**

Duty of Care have just one suggestion with regards to gambling machine licensing guidelines (other than that no gambling machines be licensed beyond 2011).

We suggest that the business plan for the proposed gambling business not only be accompanied by an explanation of how the demographic and social profile of the anticipated patron group relates to the profile of the locality (projections of gaming revenue over the following 3 years and an indication of where this revenue might come from), but that it should also include a comprehensive assessment of potential positive and negative impacts of an increased access to gambling opportunities on residents identified as the businesses targeted patron group.

Duty of Care thank the Independent Gambling Authority for considering our submission.