

# **Independent Gambling Authority**

## **Review 2006 – Regulatory Functions**

**Submission by**

*Relationships Australia*  
SOUTH AUSTRALIA

**55 Hutt Street  
Adelaide SA 5000  
Phone: 08 8223 4144**

**May 2006**

Relationships Australia (SA) will consider in the Independent Gambling Authority (IGA) Review 2006 elements of both the Responsible Gambling Code of Practice and the Second Stage Codes of Practice. We are grateful for the opportunity to make this submission as we consider the review provides us with the opportunity to look at the harm minimisation aspects of these IGA Regulatory Functions.

Relationships Australia (SA) Inc (RASA) is an independent, not-for-profit, non-Government organisation that has been providing counselling services in South Australia since 1948. In November 1995 RASA commenced providing gambling rehabilitation services to individuals with gambling problems and to people impacted by someone else's gambling behaviour.

RASA Break Even gambling rehabilitation services are provided in the central and eastern metropolitan area from our Hutt Street and Ridgehaven offices and also in the Riverland, Murray Bridge and Mt Barker. This service has been provided for ten years and the following submission draws from the experience of counsellors who have worked with people affected by gambling problems over this time.

## **I Codes of Practice - First Stage**

### **1. Customer Information and Signage**

While brochures in languages other than English are important, translated material as a stand alone strategy, is not the most effective way of reaching multicultural communities. This material needs to be complemented by culturally and linguistically responsive information and education services, such as those provided by the RASA P.E.A.C.E. Multicultural Break Even Service. Furthermore RASA has found the languages that are available in the brochures do not represent the needs of the newly emerging communities such as the Middle East and African communities.

### **2. Alcohol and Gambling**

The Break Even Services of South Australia (BESSA) have conducted a survey with some of their clients who have a gambling problem during April 2006. This survey asked a series of questions relating to consumers' experience in the last twelve months. (See Appendix A.) This survey is discussed in detail in the BESSA submission.

It was disturbing to note that there were over 30% of clients reporting that they had been served alcohol while seated at the gaming machine. It appears there is an issue with some industry hotels and clubs adhering to this important code. The need for compliance is raised here and raises the question of resources to do this.

### **3. Credit**

The survey also showed that a small number of clients had been offered credit or had obtained cash from the venue when they were gambling in the last 12 months. Once again the issue of compliance is raised here.

#### **4. Self Exclusion**

RASA has concerns that the area of self-exclusion or barring is not working as well as it has been designed to do. Self exclusion is a harm minimization tool that has been useful to a number of our clients in assisting them to control their gambling. However, we are aware that some clients are able to enter hotels that they have been barred from and they know that they can often gamble undetected. As the number of patrons barred from venues grows, we realize the ability for the many employees of hotels and clubs to recognize this growing number of faces is becoming more difficult. The current practice of keeping a folder of photos appears cumbersome and unwieldy. Many gaming rooms have more than one entry point and staff are often located a distance away from the machines.

There is a growing lack of faith in the self-exclusion process by both the industry and patrons. The industry has said that busy city hotels have large numbers of patrons barred and that they can not expect their staff to recognize excluded patrons at all times. Clients have said that they can gamble in hotels where they have been barred and that the system does not work. For a client to go through the process of self exclusion it takes a great deal of emotional energy. Many clients do this as a last resort to stop their gambling. They take the process seriously but this does not mean that some will not try to gamble at times.

There is also quite a difference in the outcomes for clients from rural and regional areas compared to the city. We can support a client through the barring process in a rural area knowing that we have a relationship with the hotel staff and the client is known in the community. This is not the case in the city and the process of barring does not exclude a patron from all hotels in the metropolitan area. The IGA will bar clients from a section of the metropolitan area but not the whole area. Yet people can easily move about the metropolitan area and so the barring does not have the same effect as in the country.

#### **Recommendations:**

1. We support item 9(3) (b) *provision for immediate referral to, or liaison with, a counselling agency.* It is ultimately up to the client to seek assistance with their gambling problem. However processes can expedite this choice if in place. It is understood the IGA recommends referral as part of the self-exclusion intervention if the client is not already in touch with a BE service.

If the barring is done by a patron at a particular hotel or club we can expect that the client is more likely to get a referral to a BE agency if it is required that a relationship exists between the industry and the BE services. This relates to the Second Stage of Practice #8 where it is proposed that *hotel and club gaming machine licensees form appropriate relationships with local gambling rehabilitation agencies.*

2. It is recommended that there be discussions with the BE services, IGA, Liquor and Gambling Commissioner and the Gaming Industry on how to make exclusion a collaborative and effective intervention.

3. The introduction of a smart card and /or facial recognition technology is probably the only assured way that a patron once excluded will not be able to gamble.

We recommend that the potential of these options still be investigated.

#### **5. Staff and Training**

A co-operative relationship with Registered Training Providers has been developing whereby BE counselors have had input into the training of gaming room managers. RASA has welcomed this relationship with the people involved. The numbers of people requiring training in the gambling industry highlight the fact that there are not enough resources to include BE counselors in all responsible gambling training programs.

The following quotes from clients of this service show the need for training of gaming room attendants.

Gillian said that the attendant told her *"You won't win if you don't bet big."*

Eric was told *"Someone put \$1000 in that machine earlier today."*  
He interpreted that to mean that it was due to pay out shortly.

Tony said that when the attendant said *"Well done"* it reinforced the idea that he had done something towards winning.

We believe that our work with people with gambling problems has identified signs that can alert staff to patrons with a problem. In 2005 RASA had a group of clients graduate from a project *The Consumer Voice* whereby clients tell their story around their struggle with gambling problems. Several of these graduates have told their story at training sessions. These stories have added depth and understanding of problem gambling for many industry workers.

We have appreciated the evolving relationship with the Casino and the Host Responsibility Program. Closer liaison has benefited a number of RASA clients.

#### **Recommendations:**

1. We recommend the inclusion of consumers in training industry workers.
2. Ongoing dialogue between training providers, the industry and BE services is essential to further the relationship with all the codes' training programs. It is suggested that a coordinated approach would ensure solutions to issues as they arose and that this would also assist in audit processes.

## **II Codes of Practice - Second Stage**

### **1. Mandatory warnings in advertising**

The mandatory warning 'gamble responsibly' is supported along with a tag line that will question the behavior of the person gambling. This supports the question 'think of what you are really gambling with?' used in recent campaigns. Other such questions should be changed from time to time and the tagline should be asked as a question.

The other benefit of this is badging the gambling product as a product which can lead to problems. This is essential for our youth who are being recruited in to gambling from a young age. A warning locates gambling in the arena for a product requiring harm minimization at the least. Using the experience of the tobacco industry suggests the need to research and change the tagline at intervals with lead times for the industry to plan ahead.

### **2. On-and in-venue signage**

We agree with the position that signage is discreet and minimalist and that there is no sandwich boards, flashing lights and signs seen from the road outside hotels. It is also noted that the signs for the Loyalty clubs are often quite large also and need to be much more discreet.

### **3. Mandatory breaks in play**

We would welcome the review of the New Zealand experience to monitor how breaks in play might affect problem gambling.

### **4. Screening sights and sounds**

This is a very important area for harm minimization, once again especially for the youth who may from a young age be spending time in the hotel environment. Anecdotal evidence from youth has told us that gambling is enticing to watch from a distance and that sometimes they "manage to sneak in" (Year 10 male) to watch or even be able to put some money in the machine.

As gambling has the status of a 'right of passage' for a number of our youth, it is essential to screen both the sight of the machines and sounds from those in the dining areas of hotels.

To do this prospectively is not going to address the above issues and we would recommend that this principle applies to all venues, not just new venues.

### **5. Six-hour break**

We would accept the IGA position on this area providing that there is no changing of this understanding between the Liquor and Gambling Commissioner and the chain of hotels.

### **6. Inducements and Loyalty Programs**

Loyalty programs and inducements have been an area that RASA has provided client information to previous submissions. Our position is that there should be no programs that encourage further gambling. Our survey in 2002 reported that of the 67% of clients with a gambling problem who had joined a loyalty club, 72% said they had spent more on gambling since they joined.

Incentives to gamble by receiving tokens in the media, mail or on-site encourage gambling with the invitation to use the money of the establishment but predicated on the understanding that patrons will put their own money in to gamble also.

David said *"I started gambling after getting free tokens with my lunch deals. I now gamble much more frequently and much more money than I want to and I am now here admitting to you and my partner that I have a problem with gambling."*

Freda said *"I thought I could withstand the lure to play my own money and just use the three extra one dollar coins given to me when they offered to change \$20 dollars but I ended up using my twenty coins too. I was sickened with myself."*

#### **7. Co-location of gambling activity**

Agree with the IGA position to not co-locate all gambling codes.

#### **8. Relationship with counseling agencies**

This is a very important area to develop with available resources being a big factor in achieving the goal for both the industry and Break Even services. The resources required will differ in the rural areas compared with the metropolitan areas depending on the number of venues. Increased staff time will be needed to liaise with gambling providers and the costs for travelling in our Riverland and Murraylands areas particularly will increase.

There are over one hundred hotels for Relationships Australia (SA) to build relationships with in its designated metropolitan area. Current RASA staff numbers make it almost practically impossible to visit each venue individually. Here the work of Gaming Care is crucial to successful links with these venues, since Gaming Care has a close relationship with the hotels and can facilitate the building of relationships.

To create relationships with the TAB is also seen as necessary as a number of our clients have problems with TAB punting. It is important not to overlook the need to include this area of gambling in building relationships with the TAB industry. Once again though there appears to be little infrastructure in place to begin relating to the TAB staff both in shops and hotels. With our current staff level we would not be able to build and maintain these contacts without a strategy and commitment from the industry.

The Casino has worked closely with RASA in the past year through the Host Responsibility Program and the Consumer Voice project. The continuing building of this relationship will benefit all involved.

**Recommendation:**

Strategic meetings with all industry codes need to be held at least annually to monitor how this important relationship can be established in some cases and maintained in those that already exist.

Gambling providers and Break Even Services would need to look at protocols for referral and plan for updating of information at least annually. Consultation between the IGA and the Department for Families and Communities will be necessary to consider resources to enable this code to work.

**9. Reporting of potential problem gamblers**

RASA supports the need for all codes to have internal reporting processes for the identification of people showing signs of problem gambling behaviour.

**10. Automated coin dispensing machines (ACDM's), automatic teller machines (ATM's) and cheque cashing facilities**

RASA supports the removal of ATM's from hotels, since EFTPOS is available for purchase of food and drink. Patrons would therefore need to consider the amount they would spend on the gaming machines prior to gambling. This would be a similar effect to putting an amount on a smart card. It encourages pre-planning of the amount to be gambled. If they have to travel to an ATM for more money at least there is some time to reconsider their actions.

In July 2004 a survey of clients asked 'Do you access more money in a gambling session if an ATM is available?' Of this group 97% stated that they did gamble more and 90% believed that they would reduce their gambling if the ATM's were removed. They said the ease at which they could withdraw more money made it very hard to stop chasing the win.

A similar response was made to ACDM's whereby clients said that with the presence of these machines they were not faced with the embarrassment of returning to a cashier for change as they chased their losses. In the same July 2004 survey, of the 76% of clients who said they accessed more money in a gambling session because of ACDM's, 66% said they believed the removal of the coin dispenser machines would reduce their gambling in a session. On the basis of these figures it would seem this could be a very effective harm minimization strategy.

Apart from the embarrassment that the patron might feel, the gaming room staff does not know what the clients are playing if they are not changing the money for patrons. The ACDM's allow patrons to lose cash anonymously. It is very difficult for staff to encourage responsible gambling if they can not make an informed decision on the basis of money spent, frequency of play and time spent in the venue. Clients would be in a position to get feedback from staff and this would be a very effective harm minimization approach.

**11. Facial recognition and smart card technologies**

The need for continuing to research this area is evident in the discussion above in No 4 Self Exclusion in the First Codes of Practice. The current process of self-exclusion is not working for a large number of patrons; the industry and clients have limited confidence in the current practice and it is becoming more unwieldy as the number of patrons barring themselves grows.

## **12. Recognition of the Casino host responsibility initiative**

Relationships Australia (SA) has found the formation of the host responsibility program helpful to our working with their clients and building relationships with the workers of the casino. We have been pleased that they have asked speakers from our Consumer Voice project to assist in training their host responsibility workers. They have found the stories of people who have had gambling problems useful to support harm minimization measures.

### **Conclusion**

In summary, there needs to be more discussion between regulators and industry and the BE services on how to diminish the issue of problem gambling. It appears from client surveys that many of the codes are not being enforced. More compliance will benefit not only the person with a gambling problem and their families and friends but also the industry itself. More compliance will on the one hand minimize the harm to persons with a gambling problem and their families and friends and on the other hand help the sustainability of industry.

It is recommended that there be much more dialogue and collaboration between all stakeholders. Individual BE services are doing what they can to create these relationships. However, it is apparent that on top of these individual efforts the Break Service network also need to work with regulators and industry so that a coherent approach can be pursued. The Break Even services of South Australia need a position created to assist in drawing together the services in these much needed conversations and strategies to create functional, efficient outcomes.

**Break Even Survey**

For Independent Gambling Authority Inquiry, May 2006

You have been asked to complete this brief survey to assist the network of Break Even gambling help services in making submissions to the Independent Gambling Authority inquiry into issues associated with gambling Codes of Practice in South Australia.

Your answers are anonymous.

Please circle your answer to each question

In the last 12 months:

	Yes	No
1. Have you been served alcohol at gaming machines?	YES	NO
2. Have you obtained credit from a venue to gamble?	YES	NO
3. Have venue staff assisted you in obtaining cash so that you can gamble?	YES	NO
4. Have you continually gambled in order to accrue loyalty points?	YES	NO
5. Have you continued to gamble in order to enter a jackpot prize?	YES	NO
6. Have you played more than one machine at a time?	YES	NO
7. Have you entered a venue from which you are barred to gamble?	YES	NO
8. Have you gambled when under age?	YES	NO

Answers that you have provided will be collated by Relationships Australia and the original survey forms destroyed to guarantee your confidentiality.

The collated responses from this survey will be used by the Break Even network and individual Break even services only.

Thanks for your help