

30 March 2012

The Committee Secretary
Joint Select Committee on Gambling Reform
Parliament House
Canberra ACT 2600

By Email: gamblingreform@aph.gov.au

JOINT SELECT COMMITTEE INQUIRY INTO THE PREVENTION AND TREATMENT OF PROBLEM GAMBLING

Dear Ms Beverley,

The Australasian Casino Association (ACA) welcomes the opportunity to provide this submission to the Joint Select Committee's Inquiry into the prevention and treatment of problem gambling. The Australian casino industry has demonstrated over many years, its commitment to responsible gambling and harm minimisation.

The ACA represents all casinos in Australia and New Zealand. Members include Echo Entertainment Group, Crown Limited, SKYCITY Entertainment Group Limited, Federal Group, Casinos Austria International Limited, Lasseters Holdings Limited, Christchurch Casino and Dunedin Casino. This submission is provided on behalf of the ACA's Australian members.

Some facts about the Australian casino industry

There are 13 casinos in Australia. All Australian casinos other than Casino Canberra offer Electronic Gaming Machines (EGMs) for play by their local, interstate and international customers.

Casinos are destination venues with the majority being integrated resorts that offer a range of dining, accommodation and entertainment options, as well as major conference and convention facilities. The casino industry invests heavily in tourism infrastructure with a number of casino companies investing in new hotels and the redevelopment of existing properties. In fact the industry is part way through investing \$4.4 billion in new and upgraded tourism and related infrastructure.

The industry employs 24,000 Australians, is a major training provider and contributes approximately 30% of its revenue in taxes across all levels of government.

The unique nature of the casino industry is highlighted by the following distinctions:

- Australian casinos are under an obligation to provide world-class services and facilities and are subject to different taxation regimes than those applying to hotels and clubs;
- Australian casinos account for only 6 percent of all EGMs in Australia and less than 7 percent of all gambling expenditure.
- Casinos are governed by strict legislation and regulation;
- Higher regulatory standards and consumer safeguards typically apply to casinos;
- Similar to overseas jurisdictions, the regulation of casinos, given their destination/tourism focus, differs from the regulation of convenience gaming machine venues such as hotels and clubs.

The casino industry has traditionally been regulated at the state and territory government level since the introduction of legalized casino gambling in Tasmania in 1973. The rationale for the introduction of casino style gambling in all states and territories has been the connection between casinos and tourism – hence all jurisdictions have seen the construction of 5 star accommodation and entertainment facilities in conjunction with the gaming offering of a casino. In recent years this has been taken to the next level as the imperative has been to introduce world class integrated resort style casinos to allow for effective competition with other Asian jurisdictions. The Australian casino industry is part way through investing more than \$4 billion in new and upgraded tourism and related infrastructure.

The ACA believes that the states and territories should have primary responsibility for the regulation of casinos. However, there is no reason why there could not be a greater harmonization of responsible gambling measures across all Australian jurisdictions coordinated by the Commonwealth (for example through COAG).

The ACA's response to the Inquiry's terms of reference is summarized below:

1. Measures to prevent problem gambling

- The ACA supports measures to prevent problem gambling, which include the use and display of responsible gambling messages and improving the ease of access to assistance for problem gambling.
- Over the last twelve years more than 200 initiatives have been implemented across Australian casinos to promote responsible gambling and to support those gamblers who need assistance with their gambling behaviour. Some of the measures that have been introduced can be summarized as follows:
 - Information is made available in all casinos about the potential social costs of gambling, in particular relating to EGMs. In addition, information on the odds and return to the player on casino games including EGMs is available and on display in all the casinos.
 - Responsible gambling information and awareness programs including players' guides exist across all 13 of Australia's casinos. This includes information for customers concerning the chances of winning and information regarding responsible gambling in gaming areas, at ATMs and in other areas of a casino.
 - All casinos have self-exclusion programs. In some states it is mandatory for casinos to have these programs in place. In others it is an initiative of the casino, or began as an initiative of a casino, in the absence of legislative requirements.
 - Five casinos have implemented voluntary pre-commitment systems linked to player loyalty programs.
 - Specialist responsible gambling staff have been employed in a number of Australian casinos to deal specifically with any responsible gambling issues that may arise. All gaming staff undergo responsible gambling training and refresher courses.
- The ACA supports a pre-commitment system for EGMs that is compulsory for operators to provide but voluntary for players to use.

2. Measures to regulate marketing strategies

- In all casinos, the ability to advertise the availability of EGM gambling is extensively regulated (through statute or codes of practice), and in some jurisdictions is prohibited.
- The ACA supports the continuing regulation by state and territory governments of marketing and incentives in the gaming industry through mandatory codes.
- Loyalty program communications are often a key measure by which gambling venues convey responsible gambling messages and initiatives to members.

3. Methods currently used to treat problem gamblers

- The ACA supports a range of measures to promote responsible gambling and assisting those players who may have a problem with their gambling as no single measure can be regarded as the sole means of resolving problem gambling behaviour.
- The ACA supports the following:
 - The use of self-exclusion as a means of assisting customers. The ACA also recognises that there may be circumstances where it is appropriate for a third party - a family member or close associate of a customer who can show that they are legitimately and adversely affected by that customer's gambling - to be given the opportunity to address these matters and remedy them in a formal and clear manner; and
 - Counselling services that are adequately funded and accredited, available nationally, culturally sensitive in its delivery and available on a 24/7 basis.

4. Training of staff in responsible gambling and early intervention strategies

- The ACA supports measures to further enhance the skills of venue staff in the promotion of responsible gambling and early intervention strategies.
- The casino industry has always recognised the importance of the training of staff in responsible gambling and early intervention strategies.
- All casinos provide dedicated staff to assist players who may need help with their gambling behaviours as well as providing training in responsible gaming practices for all front line staff.
- Loyalty program communications are often a key measure by which gambling venues convey responsible gambling messages and initiatives to members.

5. Gambling policy research, data collection and evaluation

- The ACA supports the need for evidence-based policy development. Reputable and rigorous research as well as a thorough evaluation of gambling policy should always precede any new measures that are introduced by governments.

The ACA's specific responses to the Inquiry's terms of reference are outlined in the attachment, together with examples of current responsible gambling codes, policies and initiatives implemented by the casino industry. If you need further information please do not hesitate to contact me.

Yours sincerely,

Chris Downy
Executive Director

AUSTRALASIAN CASINO ASSOCIATION RESPONSE TO THE INQUIRY'S TERMS OF REFERENCE

1. MEASURES TO PREVENT PROBLEM GAMBLING

The ACA supports Government strategies that seek to educate and inform the community in relation to responsible gaming practices. Obviously such strategies should be based on evidence-based research and evaluated regularly.

Over the last twelve years more than 200 initiatives have been implemented by Australian casinos to promote responsible gambling and to support those gamblers who need assistance with their gambling behaviour.

The Productivity Commission in its Report noted that the provision of in-venue information materials were a cost-effective and important resource referral for customers seeking assistance.¹ The Productivity Commission also noted that there was a need for research to "target optimal language and visual images ... messages should also be reviewed and /or changed as it is found that their effectiveness wanes."²

Player information in casinos

In all casinos, information is made available about the potential social costs of gambling, in particular relating to EGMs. In addition, information on the odds and return to the player on casino games including EGMs is available and on display in all the casinos.

Responsible gambling information and awareness programs including players' guides exist in all casinos. This includes information for players concerning the chances of winning and information regarding responsible gambling in gaming areas, at ATMs and in other areas of a casino. Examples of the type of information available includes information on:

- Responsible gambling;
- Self-exclusion;
- Pre-commitment programs (where offered);
- Codes of conduct;
- Odds of winning, which are also displayed on EGMs, or as an electronic message on the EGM screen; and
- Assistance available for players who may have a problem with their gambling behaviour, including counselling services.

Availability of Information

Player information is displayed in a number of locations in all casinos including:

- Entrance points;
- Cashiers;
- Gambling information terminals;
- ATM screens;
- Gaming tables, including table limit signs;
- Restrooms;
- Electronic gaming machines;
- TV display screens;
- Public phones;
- Websites;
- Information booths;
- Brochure stands; and
- On gaming related advertising.

¹ Productivity Commission, *Inquiry Report – Gambling Vol.1* (February 2010), p. 8.7

² Ibid, p. 8.15

Languages other than English

Aligned with their respective customer base, casinos have player information available in multiple languages, including:

English;
Chinese;
Vietnamese;
Indonesian;
Arabic;
Greek; and
Japanese.

Information Format

All casinos provide the above information in various formats – using brochures, signage, stickers, posters, ATM screens, TV screens and helpline cards. All casinos provide this information not only in the casino itself but also online through the casino website.

Attachment 1 provides examples of specific casino initiatives. Even smaller casinos such as Lasseters Hotel Casino in Alice Springs, for example, provide the following information:

- › *Gaming Machines – A Players Guide*
- › *Playing Pokies – Know the Facts*
- › *Anglicare Gambling Counselling*
- › *Northern Territory Code of Practice for Responsible Gambling*
- › *Hints for Gambling Management*
- › *Manage Your Gambling – A Self-Help Guide*
- › *Understanding Self-Exclusion.*

Pre-commitment

The ACA supports a pre-commitment system for EGMs that is compulsory for operators to provide but voluntary for players to use. Currently five Australian casinos provide voluntary pre-commitment for players. These systems are linked to the casinos' loyalty program. This is discussed further below.

2. REGULATION OF MARKETING

In all casinos, the ability to advertise the availability of EGM gambling is extensively regulated (through statute or codes of practice). In Victoria and NSW, gaming machine related advertising through the media and unsolicited mail is prohibited.

The Productivity Commission noted that there is an “extensive array of rules governing how gambling products can be advertised in Australia.”³ In all casinos, it is a requirement either through the casino's own code of practice, through a state or territory government's responsible gambling code of conduct, or through both, that advertising and promotions are to be delivered in an honest and responsible manner with consideration being given to the potential impact on people adversely affected by gambling. In all jurisdictions the ability to advertise the availability of EGM gambling is highly regulated, and in some states, includes prohibition of such advertising.

Advertising and promotions are required to comply with an advertising code of ethics and they are not to be false or deceptive particularly with regard to return to players. All advertising and promotions generally must accurately detail the prizes on offer and the game results available. No advertising should give the false impression that gambling is a reasonable strategy for financial betterment and must not be directed at minors, portray minors participating in gambling or be set up in an area specifically to target minors. It is also

³ Productivity Commission, *Inquiry Report - Gambling Vol.2* (February 2010) Appendix 4, p. K.4

specified that players who are excluded from a casino must not be sent correspondence or promotional material.

The following examples are provided in **Attachment 2**:

- i. Burswood's Responsible Gambling Code of Practice;
- ii. Crown's Responsible Gambling Code of Practice; and
- iii. The Queensland Responsible Gambling Code of Practice - Advertising and Promotions Guideline.

Loyalty Programs

All loyalty programs in casinos are required to give consideration to the potential impact of the player loyalty program on a person with a gambling problem. Strict rules apply in all jurisdictions to the provision of any in-venue promotions and marketing activities. Additionally:

- advertising and promotion of loyalty programs to comply with state and territory codes as well as advertising and direct marketing industry codes;
- the registration process to provide adequate and relevant information for customers to make informed decisions regarding their participation in a loyalty program;
- the loyalty program not to be directed at minors or vulnerable or disadvantaged groups;
- points accrued to be available for use in other venue activities apart from gambling;
- the loyalty program not to involve irresponsible trading practices by the casino;
- loyalty programs to incorporate responsible gambling messages in their functions and features; and
- loyalty programs comply with a casino's self-exclusion program provisions.

In the case of five casinos, their loyalty programs offer voluntary pre-commitment (loss limit) schemes as an option.

The following examples are also provided in **Attachment 2**:

- i. The Queensland Responsible Gambling Code of Practice – Loyalty Programs;
- ii. The South Australian Responsible Gambling Code; and
- iii. The Tasmanian Mandatory Responsible Gambling Code.

Loyalty Programs and Pre-commitment

The ACA supports a pre-commitment system for EGMs that is compulsory for operators to provide but voluntary for players to use.

Currently five Australian casinos have voluntary pre-commitment systems in place. They are Crown Casino, Burswood Entertainment Complex, Jupiters Gold Coast, Treasury Brisbane and Jupiters Townsville. In each case the voluntary pre-commitment system is linked to the casino's loyalty program – in the case of Crown and Burswood it is called **Play Safe**; in the case of the three Queensland casinos (all owned by Echo Entertainment Group) – it is called **Absolute Assist**.

The combination of loyalty programs and pre-commitment in these five casinos provides a demonstration of how it is possible to offer venue-based voluntary pre-commitment without rendering gaming machine hardware and software redundant. They provide a useful tool for assisting players to better manage their time and budget.

The main characteristics of these programs are as follows:

- Players can set, in advance of play, individual time and spend limits;
- Once a player's daily limit has been reached the player can no longer accrue loyalty points for a set period of time, usually 24 hours;
- Players can make their own decision based on their own circumstances when setting limits;

- To change or remove limits a player must request a change by visiting a loyalty club desk and in the case of Crown and Burswood these casinos' responsible gambling support centre; and
- A decrease in the limit can take place immediately but an increase to a limit will not take place until 24 hours after the player has made the change and the customer will be required to confirm the increase at a loyalty club desk, and at some casinos - terminal/kiosk.

Linking a pre-commitment mechanism to a loyalty program provides a mechanism for encouraging players to take up the option of voluntary pre-commitment and provides a platform for player communication, especially for responsible gambling.

Furthermore the infrastructure is already in place and it provides a faster and more cost-effective means of implementation. Loyalty programs allow for human interaction, which is important in any pre-commitment system. Responsible Gambling staff can interact with those customers where it is felt further action is required. Player activity statements are available for loyalty players – regardless of whether they participate in pre-commitment or not.

3. METHODS USED IN THE PREVENTION AND TREATMENT OF PROBLEM GAMBLING

The ACA supports a range of measures to promote responsible gambling and assisting those players who may have a problem with their gambling as no one measure can be regarded as the sole means of resolving problem gambling behaviour. Many of these have been outlined above.

An important component of any program to assist players who have a problem with their gambling is the utilization of self-exclusion. A second component is the linkage that exists between casinos and counselling services. These are discussed below.

Self-Exclusion

Casinos currently operate self-exclusion systems that are well developed, due to the placement of highly trained staff and sophisticated surveillance systems. Casinos are destination venues, operating under separate legislation that often imposes different obligations on casinos in each state and territory. The current approaches introduced by casinos reinforce an appropriate balance between personal responsibility, minimising social stigma and in some jurisdictions are underpinned by penalties being imposed for breaches. Self-exclusion has been found to be a very valuable tool for many players, as it requires their identification of an issue, their commitment and conviction.

Self-exclusion is a self-imposed ban on entry to a gaming area. It is an external control that is temporarily put in place whilst the individual develops an internal control with the assistance of their counsellor during the therapeutic process. It assists the person to stop the behaviour and then change the thinking around the behaviour. Once the person has developed their own self-efficacy they no longer necessarily need a self-exclusion order to assist them stopping from entering a venue because they are able to stop this behaviour by themselves.

It is the self-excluded player's responsibility to stay away from the venue. The venue can only assist the player. Self-exclusion needs to be a pathway for rehabilitation, which includes counselling, but without capacity to make timely referral effectiveness can be compromised. Therefore there needs to be better levels of problem gambling training and information available in the broader health services community so referral can be made promptly when a client seeks assistance for a co-morbid condition that is not problem gambling.

The ACA and its members are open to any initiative that would improve self-exclusion options for players. This could include jurisdiction-wide self-exclusion options and third party exclusions.

In the case of jurisdiction-wide self-exclusions the casino industry is open to participating in any discussions regarding the extension of self-exclusion to include all venues in a jurisdiction, recognizing there will be a range of technological and logistical issues to be addressed. However, there is scope for reviewing current self-exclusion programs to determine what are the best practices in this area and where possible the implementation of these practices and policies on a jurisdiction wide basis.

With regard to third party exclusions, the ACA recognises that there may be circumstances where it is appropriate to provide a family member or close associate of a player, who can show that they are legitimately and adversely affected by that player's gambling, the opportunity to address these matters and remedy them in a formal and clear manner. The development of such a process should ensure that appropriate legal and privacy safeguards are put in place to protect both the interests of the third party excluder and the person who would be the subject of the exclusion. These safeguards should ensure that the process is fair to all involved and that the scope for unfair or vexatious third party claims or exclusions and any resulting or potential damage is limited. Casinos in a number of states, including Western Australia, Tasmania and South Australia already have measures in place for third party exclusions.

Attachment 3 provides a summary of all casinos' self-exclusion programs as they currently stand.

Counselling Services

Counselling services are an important component of any responsible gambling policy. Australian casinos have developed protocols with accredited problem gambling service providers, who provide treatment for problem gamblers and support for their families and friends. These protocols include such arrangements as:

- The provision of contact information to customers seeking such information;
- Referral of customers seeking self-exclusion (as part of the self-exclusion process) or seeking assistance to such accredited problem gambling service providers; and
- Where permission is given, contact with problem gambling services.

The ACA supports:

- An expanded and improved counselling service that is national in scope, culturally sensitive in its delivery, available on a 24 hour 7 days a week basis.
- A national system of accreditation for problem gambling service providers. This accreditation should be introduced in a staged program and be a condition of on-going funding for service providers.
- A uniform and minimum standard of training and education for government funded and private problem gambling counsellors. Governments need to provide more resources for government funded counselling – especially the number of counsellors and the number of counsellors who can speak a language other than English.
- A coordinated program that delivers a multi-disciplined service that operates under a dedicated service name or brand that provides a clear identification of the target group.
- The development of a comprehensive national data set to be used as a tool that is utilised by problem gambling service providers as well as being a means of providing feedback to counselling services, industry and the community on a regular basis.

There is a need to extend the hours offered by counselling services outside of business hours. Many casinos experience difficulty in referring players for timely counselling. In some cases feedback received from players suggests that government funded telephone counselling is not always effective.

Government funded on-line counselling works for a particular group but is not always appropriate for crisis work. It can be helpful during the recovery period and consolidating gains made in face-to-face counselling.

The ACA supports the Productivity Commission's view that there needs to be a better integration of help services with the rest of the health system, given the need for referrals for co-morbidities and "the probable economies of addressing gambling harms with any associated mental health problems"⁴.

4. EARLY INTERVENTION AND STAFF TRAINING

Measures implemented to assist customers with gambling problems

The ACA supports measures to further enhance the skills of venue staff in the promotion of responsible gambling and early intervention strategies. The casino industry has always recognised the importance of the training of staff in responsible gambling and early intervention strategies.

Staff Training

There are more than 200 staff (FTEs) whose area of expertise and responsibility is in Responsible Gambling working in Australia's 13 casinos. In addition, other staff – mostly in management, gaming and food and beverage, who work on the main gaming floor of a casino, are required to undertake responsible gambling training.

All casinos train staff in responsible gambling. Most casinos have all staff complete responsible gambling training when they commence employment, and most conduct refresher courses every one to two years.

All casinos comply with legislation that exists within their state with regard to Responsible Service of Gambling training, and a number of casinos also have voluntary training in place, or go beyond what is required by legislation.

As an example, Crown's responsible gambling training includes:

- All Crown staff complete the VCGLR approved Responsible Service of Gaming Training;
- All new Crown staff complete Induction, where they are first introduced to Crown's Responsible Gaming Programs, Code of Conduct, Observable Signs and self-care;
- Relevant staff complete a facilitator led session with Responsible Gaming Staff;
- Relevant managers complete 'Senior Management Training', an advanced facilitator led RSG session;
- Relevant staff complete a refresher training every two years;
- From time to time, specifically targeted training is provided to certain sections of Crown i.e. Environmental Services staff, Hotel management; and
- Business Unit presentations – refresher presentations are provided to Business Unit management in relation to Crown's Responsible Gaming Programs.

Courses conform to a national competency unit – SITHGAM006A (Provide Responsible Gambling Services). Larger casinos have Registered Training Organization status while other casinos employ Registered Training Organisations to run their courses. The courses seek to ensure that:

- Staff have a knowledge of the mandatory requirements as set out in regulation and legislation as well as a knowledge of their own organisation's Code of Practice;
- Staff have a knowledge of the nature of gambling and problem gambling; and
- Staff have an understanding of how to respond to those players who may present with problem gambling behaviours.

Responsible gambling staff in Australian casinos provide assistance and referral to players usually based on observable signs as observed by themselves or other staff. They are usually guided by policies and procedures that apply to the individual casino. In general, staff can assist players by:

⁴ Productivity Commission, *Inquiry Report- Gambling Vol.1* (February 2010), p.35,

- › Talking about gambling with players in an empathetic, non-judgmental manner;
- › Build a rapport that invites disclosure and helps to motivate change in the customer;
- › Being alert to the indicators of problem gambling;
- › Making information on problem gambling and support services available;
- › Linking players to specialized services; and
- › Follow up with the player if consent is given.

All casinos have developed strong links with counselling services. Casinos also participate in Responsible Gambling Awareness Weeks that are a joint activity between industry, community and government to promote responsible gambling in their respective states and territories.

Attachment 4 provides examples of how casinos participate in Responsible Gambling Awareness Week.

5. GAMBLING POLICY RESEARCH AND EVALUATION

The ACA has always supported the need for evidence-based policy development. Reputable and rigorous research as well as a thorough evaluation of gambling policy should always precede any new measures that are introduced by governments.

The Ministerial Council on Gambling established Gambling Research Australia to oversee the national gambling research agenda, which is funded by the states and territories. The states and territories also fund research through their respective departments. These state and territory departments have developed links with a number of academic gambling researchers and research centres. Often there has been overlap and duplication of research projects with little consideration given to coordination at the national level.

The ACA believes that there is an opportunity to establish a nationally focussed research capability that will focus on issues surrounding gambling in a more systematic and strategic way and to inform future policy development in relation to gambling issues. Such a capability should also draw on the expertise of industry. Such a body could be co-ordinated and funded by the Commonwealth, together with additional funding from the states.

The ACA supports:

- A review of the current arrangements overseeing gambling research by the Ministerial Council for Gambling. Any such review should take into account an assessment of the value of research already undertaken.
- Research oversight by the National Health and Medical Research Council, or a similar body to ensure rigorous high quality standards of publication and peer review.
- The inclusion of all stakeholders including industry in determining any new future research program.
- The development of a national strategy for responsible gambling research by this new collaborative structure.

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