

Inquiry into the Prevalence of Interactive and Online Gambling in Australia

**Submission To: Australian Senate
 Community Affairs Reference
 Committee**

**From: UnitingCare Wesley Adelaide &
 South Australian Heads of
 Christian Churches
 Gambling Taskforce**

Date: July 2010

This submission is a response from UnitingCare Wesley Adelaide and the SA Heads of Christian Churches Gambling Taskforce to the Inquiry into the Prevalence of Interactive and Online Gambling in Australia by the Australian Senate Community Affairs Reference Committee

SUBMITTING ORGANISATIONS

UnitingCare Wesley Adelaide

UnitingCare Wesley Adelaide is an agency of the Uniting Church and is a South Australian community service organisation with over 100 years experience in providing services to assist low income and disadvantaged people. The organisation works with individuals, families and communities to break the cycle of disadvantage, in a range of settings across South Australia.

UnitingCare Wesley Adelaide's vision is for "a compassionate, respectful and just community in which all people participate and flourish."

Based on Christian ethics their values are:

Respect and compassion for all people
Belief in the innate worth of all people
Justice, particularly for those disadvantaged in our society
Being a service to others
Restlessness for what could be
Non-violence and peace

SA Heads of Christian Churches Gambling Taskforce

The Christian Churches Gambling Taskforce (GTF) was established in 1998 as a result of a resolution of the Anglican Synod of that year which expressed concern about the growing harm from problem gambling, particularly poker

machine gambling, that was being witnessed by Anglican community services and some parish priests. The Heads of Christian Churches, at the request of the Anglican Synod subsequently agreed to establish a Taskforce, with broad denominational reach, to focus of the pastoral concern of the Christian Church in South Australia on the adverse impacts of gambling. The GTF remains the only standing committee of the South Australian Heads of Christian Churches, reflecting the denomination wide concern about gambling harm.

The GTF recognises the diversity of views about how best to tackle gambling harm and has deliberately taken a harm minimisation approach meaning that in all circumstances they seek the approach which is most likely to reduce gambling harm.

The GTF has actively engaged with industry, regulators and government to promote a range of legislation, regulation and programs to reduce gaming harm. The Taskforce was instrumental in the establishment of the independent gaming authority in South Australia and the subsequent development of gambling codes of practice, and has actively engaged in the public policy of gambling over the last decade.

SUBMISSION OVERVIEW

This submission addresses each of the terms of reference from the Australian Senate Community Affairs References Committee, and concludes that online and interactive gambling are highly risky activities that require greater consumer protection measures to be applied to existing activities. We do not believe that there is any argument of community benefit to suggest there's value in weakening existing legislation regarding online and interactive gambling

KEY PROPOSALS

There is currently no clear structure in Australia to ensure that interactive and online gambling is appropriately monitored and that compliance with existing gambling regulation exists , to ensure that consumer protection laws are applied. We strongly believe that a national interactive and online gambling compliance enforcement body is needed, probably as a unit within the Federal police. This body would then be able to work closely with State and Territory gambling regulators which also need stronger powers to be able to respond to inappropriate practice from online gambling providers.

There is a need for the prompt establishment of priority consumer protection measures for existing online and interactive gambling and wagering activity, including:

1. a process of rigorous verification measures for all online and interactive wagering and gambling providers operating in Australia, to ensure that all gamblers are over the age of 18

2. issuing of regular statements of play during online and interactive gambling sessions and on a monthly basis
3. the immediate development of a national pre-commitment program, specifically for online and interactive gambling and wagering, based on the principles outlined by the Productivity Commission in chapter 10 of its February 2010 Gambling Inquiry report.

We strongly urge this Senate committee to draft appropriate legislation to be introduced into the Australian Parliament, as soon as practical, to give primacy to consumer protection and the precautionary principle, as applied to risky activities, including gambling, ahead of corporate profits and the sometimes illusory benefits of free trade (in part as a response to the High Court's upholding of the Betfair challenge to the Western Australian government's ability to require gambling consumer protection measures for its citizens).

OTHER MATTERS

We observe that online and interactive gambling are global activities, this limits the extent to which nation-states can optimise consumer protection for their citizens, on their own. We urge this Community Affairs Reference Committee to investigate opportunities to develop shared international protocols, codes of practice, compliance and enforcement mechanisms to reduce the risk of gambling harm from interactive and online gambling.

Signed.....
 Simon Schrapel
 Chief Executive Officer
 UnitingCare Wesley Adelaide

Signed
 Helen Carrig
 Chair
 Heads of Christian Churches
 Gambling Taskforce

Key Message

The organisations collaborating on this submission wish to state in the strongest possible terms that gambling is a risky activity. Online and interactive gambling is a particularly risky activity and the public policy imperative with risky goods or services must be to apply the precautionary principle; that is, to act to protect consumers and their interests, including vulnerable citizens.

We make a general observation that historically in Australia, gambling 'liberalisation' has been promulgated by business interests and has been introduced without due regard to consumer protection and to assessing the riskiness of gambling products, to the considerable detriment of individuals, their children, family and communities.

With each successive introduction of new gambling activity, levels of problem gambling have increased at a greater rate with the last significant introduction of new gambling, electronic gaming machines, producing a tenfold increase in the level of problem gambling. We make this observation from the South Australian situation, where best estimates of problem gambling levels early in 1994 suggested that problem gambling numbers, using the South Oaks gambling screen, were of the order of 2000 to 2500 people. In South Australia, poker machines were introduced into hotels and clubs in July 1994. When the Productivity Commission's first inquiry into Australia's gambling industries was undertaken in 1999, they estimated that about 2.1% of the adult population had a gambling problem, equating to about 23,000 – 24,000 people in South Australia – a tenfold increase in problem gambling in five years!

We observed that when Internet and online gambling was liberalised in the United Kingdom, leading gambling help service, GamCare, reported that within a couple of years about a quarter of the people presenting for assistance with problem gambling was with interactive and online gambling.

The Australian government must strenuously resist corporate sector pressures to introduce another monumental social burden onto the Australian community, through liberalising interactive and online gambling.

Terms of Reference

The following comments related to specific elements of the inquiry's terms of reference.

Term of reference (1): the prevalence of interactive and online gambling in Australia and the adequacy of the Interactive Gambling Act 2001 to effectively deal with its social and economic impacts.

Regarding prevalence, the Productivity Commission's recently released gambling report considered this question, as well as can be, given difficulties with accurate prevalence data for online and interactive gambling in Australia.

We wish to draw the inquiry's attention to the Canadian report' "Internet Gambling Prevalence Patterns Problems and Policy options", the final report to the Ontario Problem Gambling Research Centre Alberta University, Canada. The report's authors are R. J. Williams and RT Wood.

Of particular concern is the observation from this report that the prevalence of problem gambling is 3-4 times higher amongst Internet gamblers than non internet gamblers. Given that the Productivity Commission has reported that in Australia about 15% of regular poker machine players have a gambling problem and another 15% of regular players are at risk of developing a gambling problem, then there is considerable cause for concern as the potential for harm from regular Internet or online gambling is at a higher rate than it is for poker machine play in Australia. **These are key reasons why the precautionary principle must be applied to this policy issue.**

We reproduce below, the table prepared by Gambling and Public Health Alliance International, based on the research undertaken by Williams and Wood.

Estimated international internet gambling prevalence – country comparisons

Country	Prevalence Estimate
New Zealand	2%
Australia	4.3%
United Kingdom	3% – 11%
United States of America	4%
Sweden	7%
Norway	7%%
Netherlands	3.5%
Canada	2.1 – 3.5%
Hong Kong	5.3%
Macau	4.3%
Singapore	4.1%
Finland	14%
Iceland	1.6%

Source: Gambling and Public Health Alliance International

Note: different measurement methodology is used in some countries so comparisons should be treated with caution.

We observe from this data that Internet gambling prevalence is highest in the countries that have permitted Internet gambling for the longest, specifically Scandinavia and Europe. The lower prevalence rates are in countries more recently introducing Internet gambling, noting that while Australia has a ban on Australian companies providing Internet gambling services to its citizens, international providers are still able to provide Internet gambling to Australian citizens.

Regarding the effectiveness of the Interactive Gambling Act 2001, collaborating organisations believe that the act is totally inadequate for a number of reasons, including:

- The Act was not drafted to deal with the range of public policy considerations associated with interactive and online gambling, and so has not taken into consideration the number of important policy factors. In particular, the Act does not consider the risks from gambling harm and the policy and regulatory environment that would be necessary to ensure that Internet gambling products were safe for consumers.
- The Act was drafted a decade ago, and there have been dramatic technological changes in that time, making the Act quite out of date.
- The Act was drafted in understanding that gambling legislation and regulations compliance enforcement were all State and Territory jurisdictional responsibilities. Gambling is increasingly understood to be a national as well as a State and Territory responsibility.
- The Act does not adequately consider the international dimensions of interactive and online gambling, where international protocols and compliance enforcement regimes are needed. No single country can adequately regulate any Internet-based service or activity.

The overarching policy issue is that the Australian national government needs to play a greater role in gambling policy. Clear, unambiguous, overarching gambling policy objectives are needed which we strongly suggest should first and foremost be about adequate protection of Australian consumers dealing with a dangerous product. Only when an overarching, consumer protection focused objective is understood and legislated, can subordinate Legislation (including legislation associated with interactive and online gambling) be appropriately developed and implemented.

We highlight that the Interactive Gambling Act 2001 does not go close to adequately dealing with the social impacts of Internet based gambling.

Term of reference 2(a) and 2(b): the inquiry must consider “the recent growth in interactive sports betting and the changes in online wagering due to new technologies” and “the development of new technologies, including mobile phone and interactive television, that increased the risk and incidents of problem gambling.”

The bigger issue than the emergence of new technologies that can carry gambling applications, is the deep penetration of these technologies, with the vast majority of Australians (including young people) now owning a mobile phone, while the Internet is in the homes of almost all middle and higher income households. New technologies and applications are very widely accessible.

While the evidence internationally about the demographic characteristics of interactive and online gamblers who have a gambling problem is ambiguous, there is no doubt that younger people are ready users of new and emerging telecommunications and information technology, and it should also be noted that young males in particular, are still developing the capabilities for risk determination into their twenties. This means that young people, and young males in particular, are at considerable risk from problem gambling through

heavily promoted gambling activities using newer interactive and communication technologies.

The risks from interactive and online gambling using new technologies are substantial for reasons including the following:

- Mobile phone technologies, in particular, as well as Internet gambling at home and interactive gaming through TV are all immediately accessible and technologies with which people are very comfortable. Given that most citizens carry a mobile phone with them pretty much 24 hours a day, increased accessibility of mobile phone based gambling means most citizens are effectively carrying a casino with them 24 hours a day seven days a week.
- Mobile phones, computers and interactive television are all technologies that people feel very comfortable with because they are associated with recreation and relaxing, meaning that piping gambling through these technologies catches people when they are most relaxed and less inclined to make rational decisions, creating a greater risk of harm than that which occurs with high risk poker machines in hotels and clubs. At least in hotels and clubs a conscious decision must be made to walk into the gaming room, not so with home-based personal communication and information technologies.
- Security on home-based computer and interactive television technologies is limited, so it is relatively straightforward for a minor, person with an intellectual disability, or a person with a mental health problem to readily access online and interactive gambling through these devices, with a high risk of harm.
- Advertising and promotion for gambling can bombard people using their phones, TV's and computers for their intended purposes, without any controls or regulation, again putting significant numbers of citizens at risk of participating in unintended gambling activity.
- People in the comfort of their own homes are also at risk of gambling while under the influence of alcohol and illicit drugs, as well and prescribed pharmaceuticals, all impairing rational decision-making.

Term of reference 2 (c): the committee must consider “the relative regulatory frameworks of online and non online gambling.”

We strongly believe that current regulatory arrangements for non-online gambling are inadequate, as evidenced by the number of Productivity Commission Report recommendations pertaining to increasing consumer protection for poker machine gambling. Recommendations to introduce universal pre-commitment, set maximum bet limits, produce and standardise gaming room opening hours, remove ATMs from gaming rooms and establish stronger national electronic gaming machine (EGM) design standards are recommendations that are supported by the collaborating organisations and which also indicate the current inadequacy of gambling regulation, particularly relating to poker machines.

However, regulatory frameworks are more advanced for non online gambling than they are for online gambling where regulation is minimal and

responsibilities for ensuring compliance even less developed, meaning that online gambling providers can readily flaunt even the most basic state and territory based gambling codes and regulations.

For example, South Australian gambling codes of practice all require the advertising of gambling to be accompanied by a responsible gambling message. Yet at AFL football matches at AAMI Stadium in West Lakes, electronic signage along the fence, the length of the oval, during AFL matches, regularly promotes an online wagering business, including large flashing screenings saying “bet now”, yet no appropriate responsible gambling messages accompany this advertising.

At an even more serious level, the High Court's decision to uphold the Betfair appeal against the ability of the Western Australian government to apply consumer protection measures in that State is a clear indication of the complete inadequacy of current Australian government legislation associated with gambling. We remain appalled that Australian legislation gives precedence to ‘competition policy’ over both the protection of citizens from dangerous and harmful services and products, and from the rights of State and Territory governments to apply consumer protection measures in their jurisdictions. The failure of the national Parliament to redress this legislative disaster is a further example of hopelessly inadequate gambling policy.

National legislation is urgently needed to give priority to measures to protect citizens through consumer protection having precedence over exploitative profit-making.

We also observe that there is currently no clear structure in Australia to ensure that interactive and online gambling is appropriately monitored and that compliance with existing gambling to ensure protection laws is applied. We strongly believe that a national interactive and online gambling compliance enforcement body is needed, probably as a unit within the Federal police. This body would then be able to work closely with State and Territory gambling regulators which also need stronger powers to be able to respond to inappropriate practice from online gambling providers.

We believe that there is urgent need for an improvement of consumer protection provisions for existing online wagering and interactive gambling; in particular we propose prompt action to instigate:

4. a process of rigorous verification measures for all online and interactive wagering and gambling providers operating in Australia, to ensure that all gamblers are over the age of 18.
5. issuing of regular statements of play during online and interactive gambling sessions and on a monthly basis
6. the immediate development of a national pre-commitment program, specifically for online and interactive gambling and wagering, based on the principles outlined by the Productivity Commission in chapter 10 of its February 2010 Gambling Inquiry report.

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We are interested in the new Australian Consumer Law and its applicability to gambling in general, and online and interactive gambling in particular. We suggest that in a gambling activity involving a provider, a gambler needs to be regarded as a 'contract', as understood by the Australian consumer law. Therefore the provisions and penalties of unfair contracts, under the new Australian Consumer Law, should apply to gambling activity, including any online or interactive gambling activity involving an Australian citizen. We have been unable to carefully consider the implications of the new Australian Consumer Law, in the context of online and gambling, but urge the committee to carefully consider this relationship, as part of their deliberations.

Term of reference 2 (d): the committee must consider "inducements to bet on sporting events online."

UnitingCare Wesley Adelaide recently received an e-mail with the following statement:

"I just received a call from a company which appeared to be selling internet gambling. The line was "would you like to earn money at home using your computer?"

Unfortunately we didn't get much info about them but believe the company name was . A quick look on the internet didn't find anything related to the company name that fitted what they were offering.

Would have to say this a disturbing new way of getting people sucked into internet gambling." – Rod

We suggest that this short e-mail contains a number of concerns about online and interactive gambling, including:

- Online gambling providers, it appears, are free to make misleading and deceptive claims; in this instance the connection between earning money at home using your computer and online gambling. We suggest making money at home, on a regular basis, through online gambling is indeed a misleading and deceptive claim.
- Online gambling providers can be almost impossible to locate, meaning any relationship with the gaming provider is almost impossible, meaning that any redress for consumers from deceptive, misleading and unconscionable behaviour by the gambling provider is almost impossible to achieve.
- No protection measures are in place to support the responsible provision of online gambling.

The contributors to this submission also observed that there are online gambling providers, and web site homepages of sporting bodies that offer inappropriate inducements to gamble, including 'free cash' and statements like "support your team (where the actual team is named) – bet now". We consider both offers of free cash and free games to be inappropriate inducement to gamble as is the direct link with elite sporting teams and online gambling.

We also note that online betting companies have formed 'partnerships' with most of the elite sports and popular sporting clubs across Australia. We observe that when entering the web site of AFL football clubs, for example, one of the largest links on the homepage is to a sports betting company. These sporting club sites are widely used by children and young people, who are exposed to a normalisation of online wagering with every visit to the website of their favourite football club. They are also actively encouraged to support their club by gambling. This is highly inappropriate.

Term of reference 2 (e): The committee must consider "the impact of betting exchanges, including the ability to bet on losing outcomes."

We are opposed to the operation of betting exchanges in Australia, they add nothing of social or net economic value, and create the opportunity for additional gambling harm to be introduced into Australian Society.

It is noteworthy that the ability to bet on losing outcomes, on practically any event, means that regulation to maintain reasonable consumer protection standards are very difficult to put in place, and certainly do not currently exist in Australia.

At a sporting codes level, we consider that betting exchanges, and the capacity to bet on any individual event within a sporting contest, expose sporting codes to high risk of loss of game integrity, through gambling. Where gambling has been identified as a problem with sporting contests, it is the ability to influence the final result of a sporting contest that has been able to be identified, we suggest is much harder to identify breaches of game integrity in events like which (AFL) player will kick the first goal, was the ability to bet on player X having less than, say, 10 disposals in a game. It would not be difficult for a small group of players, or even officials, within a team, to influence the outcome of a particular 'sub event' from a sporting context, that could be the subject of corrupt betting activities, without having bearing on the overall winner or loser of the sporting contest. This situation however still brings into doubt the integrity of sporting contests. We suggest that in their headlong rush to embrace online gambling sponsors, sporting codes have placed the integrity of their sport at great risk, and have not put in place adequate integrity protection measures for their sport.

Term of Reference 2 (f): the committee must consider appropriate regulation, including costs of disclosure, for persons betting on events over which they have some participation or special knowledge, including match fixing of sporting events.

We strongly recommend that no official, salaried or volunteer, player, coach, administrator, board member or any other person directly involved with a sporting club should be able to place a bet on any event associated with their sport. So for example, a physiotherapist assisting in the Essendon Football Club should not be able to bet on any game or activity associated with Australian Rules football, be it an AFL match, West Australian Football

League match or any other State or regional professional, semi-professional or amateur league.

Our reason for this view is to protect sport integrity. We recognise that there are extensive informal networks within sporting codes, so to use the Essendon physiotherapists example, he or she may have developed a close friendship with an excellent list player who comes from West Australia and has inside knowledge about developments with a club in the West Australia Football League, that is not publicly known, and could influence the outcome of an event within a WAFL game. Extended informal networks within a sporting code, across state league boundaries, can be strong enough to enable a small group to influence the outcome upon which a wager could be placed.

This blanket approach should apply to participants in any sporting code who should be banned from placing a bet directly or indirectly, eg for or through a third-party.

We are strongly of the view that a national gambling regulator needs to be established with responsibility across the range of gambling codes, and with responsibility for developing international gambling regulation codes, agreements, protocols and compliance mechanisms. Given such a body, part of their role would be to oversee sporting code compliance with gambling / wagering codes and regulation, in cooperation with the management of the various sporting codes. Professional sporting codes should be required to contribute to this function. So the AFL, for example, would be required to establish a game integrity unit that would work with the national gambling regulator, in particular to monitor and enforce compliance with the rule of no gambling on the sporting code by people from that sporting code.

Appropriate Regulation.

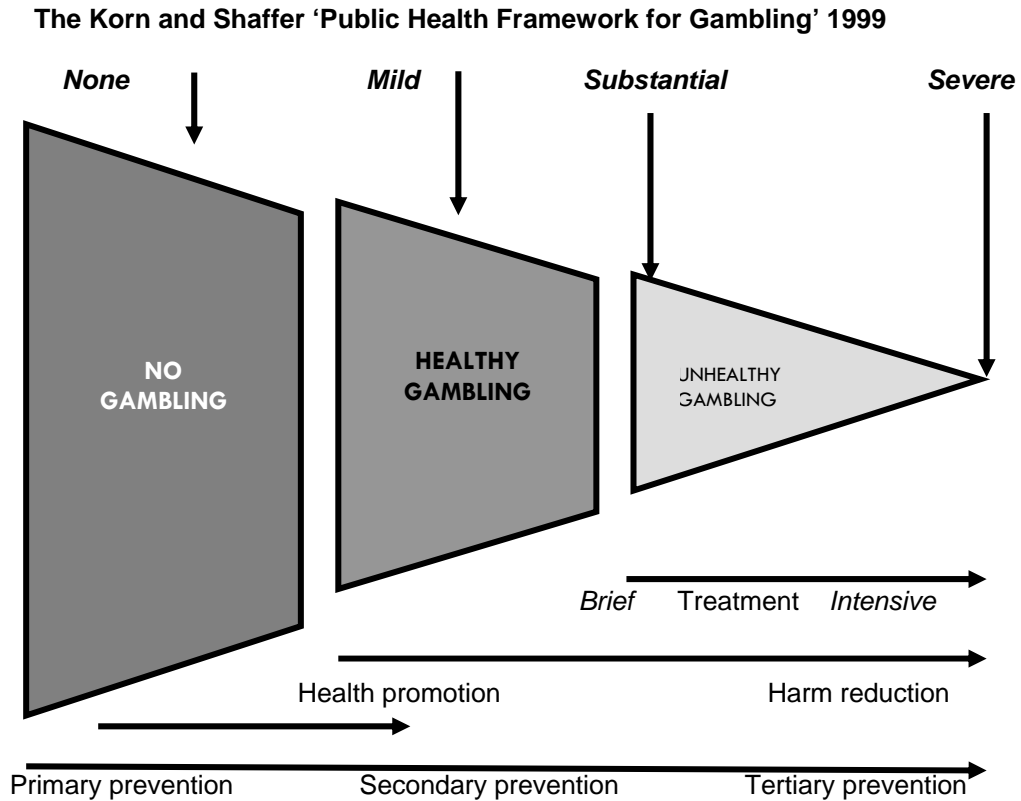
In this section we outline the core regulatory elements that should apply to any gambling activity offered in Australia, whether from an Australian or overseas-based provider, whether terrestrial or online.

Element 1

Clear national legislation that identifies the consumer protection responsibility of any gaming provider to provide a safe product with a low likelihood of causing harm, where harm is understood to be problem gambling behaviour. This national gambling legislation should set standards that apply to all forms of gambling, including online and interactive, and should utilise a public health model as the basis of establishing consumer protection.

Public Health Approach

The following diagram outlines a widely used public health framework for gambling.



By a public health model we mean an approach that:

1. is population wide
2. has most resource allocation and regulation emphasis given to primary prevention, including public awareness campaigns and other educative activities.
3. puts adequate resourcing into secondary prevention, including brief treatment and online help material
4. allocates enough funding for intensive treatment services for people with a gambling problem

National legislation would also specify a minimum rate of return, to the player, for any gambling product offered in Australian, or by an Australian online gaming provider.

Legislation would also set maximum daily spending limits for any gambler: we suggest \$50 per day, with an application process established for any gambler wishing to exceed this limit.

License fees and tax rates would also be specified in legislation, indexed and with 5 yearly reviews.

Element 2

Establishment of national functions to establish regulations and to ensure compliance with legislation and regulations and to enforce these. There are a number of ways that this can be achieved, many of these would be acceptable, thus we have not specified a preferred model at this stage.

All Crim-Track compliance requirements must apply.

We also strongly recommend that regulations require online and interactive gambling providers to provide a list of all their gambling transactions, to an appropriate regulator.

Element 3

Licensing of all providers of any gambling activity to ensure the suitability of the operators, minimise the risk of infiltration by criminal activities. Licensing of providers will include the requirement for returns to be lodged with the appropriate regulatory function, and for auditing of consumer protection measures.

Where sporting codes are involved, appropriate functions to ensure support integrity will need to be defined and implemented.

Element 4

Establishment of consumer protection functions, which must include:

- Codes of practice regarding advertising and promotion
- Codes of practice relating to consumer protection and information provision activities
- Ensuring that any gambler is over 18 years of age
- Ensuring that no gambler can use an identity, other than their own unique personal identity, for the purpose of gambling.
- Ensuring that pre-commitment technology is required to be used by any gambler using any gambling code. Minimum functions of pre-commitment activity would include
 - Daily spending limits
 - Regular break in play
 - No gambling possible once limit reached
 - Identification of changes in gambling play that may be indicative of problematic gambling behaviour
 - Direct intervention with the gambler, by the gaming provider, when any limit is reached, including referral to a registered gambling help service
- Technical specifications for the gambling activity, including limits on speed of play, accessibility, and gambling game integrity.

Element 5

Ensuring that adequate funding is available for research, monitoring and prevention of an appropriate range of prevention and help services, in line with the public health approach to gambling.

We suggest that an hypothecation of 10% of revenue from online gambling would need to be allocated to these functions.

Terms of reference 2 (f): any other related matters

We wish to raise two other matters that we believe are relevant to this inquiry

1. Primacy of legislation.

On 27th March 2008, the High Court of Australia upheld a challenge by betting Company Betfair, against the Western Australian government. The Western Australian government had sought to maintain consumer protection measures as applied to gambling for residents of that jurisdiction. Betfair, who held a license to operate in Tasmania, argued that Western Australian consumer protection measures constituted a barrier to trade. A part of the High Court decision stated:

“The Court held that the two sections contravened section 92 of the Constitution as they imposed discriminatory and protectionist burdens on interstate trade and were inconsistent with the absolute freedom of interstate trade and commerce guaranteed by that provision.”

While we have no doubts about the legal veracity of this High Court decision, we are appalled that Australian legislation gives primacy in the law to an activity of dubious social benefit, ahead of the maintenance of legitimate consumer protection.

We strongly urge the Senate Community Affairs References Committee to draft appropriate legislation to be introduced into the Australian Parliament, as soon as practical, to give primacy to consumer protection and the precautionary principle, as applied to risky activities including gambling, ahead of corporate profits and the sometimes illusory benefits of free trade.

We think it appropriate that the Senate apply its established role to represent the rights of States, in this instance to reinforce the role and right of States to establish and maintain appropriate consumer protections for their citizens.

2. International collaboration.

We also observe that online and interactive gambling global activities, limit the extent to which nation-states can optimise consumer protection for their citizens, on their own. We urge this Community Affairs Reference Committee to investigate opportunities to develop shared international protocols, codes of practice, compliance and enforcement mechanisms, to reduce the risk of gambling harm from interactive and online gambling. We suggest that there are international forums in which actions of this nature can be pursued, including (international) regional forums (eg ASEAN) as well as established international groups including United Nations agencies, IMF etc.

Final Comments

We conclude that online and interactive gambling are highly risky activities that require greater consumer protection measures to be applied to existing activities. We do not believe that there is any argument to suggest that there is community benefit in any weakening (liberalisation) of existing legislation regarding online and interactive gambling.

Consumer protections need to be enhanced for existing on-line gambling and wagering activity that is permitted in Australia, including:

- Ensuring that nobody under 18 years of age is gambling on line.
- Requiring all on-line gambling and wagering offerings to include a regulator approved and monitored pre-commitment element for all users
- The vetting and licensing of all on-line or internet based gambling and wagering providers operating in Australia, with any debt incurred by Australian citizens to un-licensed operators not being recognised
- Use of software to identify changes in play that could be indicative of problem gambling behaviour, with approved responses being made.

Further comment of Information:

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