

28 March 2012

Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Sir or Madam,

Submission into prevention and treatment of problem gambling

Introduction

This submission is written on behalf of the federation of Relationships Australia organisations. Four of our member organisations, namely Queensland, South Australia, Victoria and Tasmania, provide specialist counselling and support for problem gamblers and their families. This submission takes into account their views in particular.

Each Relationships Australia organisation provides a range of services, including relationship counselling, family support and family dispute resolution. Services are funded by the Commonwealth Departments of Attorney-General, and Families, Housing, Community Services and Indigenous Affairs, as well as state and territory governments. Gambling support programs in the above four jurisdictions are funded by their respective state governments.

We are committed to social justice and inclusion, and respect the rights of all people, in all their diversity, to live with dignity and safety, and to enjoy healthy relationships.

This submission is divided into two parts: prevention strategies and intervention and treatment strategies.

Prevention strategies

Relationships Australia supports the adoption of both public health and consumer protection policy frameworks to minimise the harm caused to individuals and families by problem gambling. Such frameworks need to take into account the social, political and economic factors that may have contributed to the development of gambling related problems.

Prevention strategies include:

- **National education campaigns that**
 - ensure gamblers are educated about gambling and its possible consequences;
 - do not stigmatise and shame;

- raise awareness of the effects of gambling on children and young people; and
- help to educate and assist those people who are closest to the person with gambling problems.
- Management and regulation of gambling marketing approaches

The Productivity Commission (2010) acknowledged the value of community awareness campaigns:

“Overall, community campaigns can build community resilience to problem gambling by dispelling myths about gambling and making people aware of strategies to control their gambling. Awareness of how to gamble without getting into trouble is critical to people making rational choices, minimising harm and encouraging earlier help seeking. The evidence suggests that campaigns that focus on the threat of future consequences (financial loss, relationship breakdowns) could promote earlier and increased rates of formal help seeking”.¹

Education

Relationships Australia recommends that national education campaigns be funded to ensure that people who participate in gambling activities have a comprehensive understanding of the products, the costs and the possible consequences of extended engagement with any gambling activity. The campaigns, preferably through television, will increase peoples’ understanding of the hazards associated with gambling and particular gambling products.

While written information may be available in brief formats in venues, there is no guarantee that people will read the material, or indeed, that people are able to read it. As evident through the Australian Bureau of Statistics study (2006)² on health literacy, a large percentage (46%) of the Australian population has a medium to low level of literacy. Migrants from non-English speaking countries are particularly challenged and only 26% achieved the standard level of health literacy. Depictions of how problem gambling develops need to be realistic and take account social issues like loneliness, and how easily people can fulfil a longed for sense of connection with others in peopled environments that offer free food, drinks and physical safety.

¹ Productivity Commission Report on Gambling 2010 p7.14

² Australian Bureau of Statistics (2006) Adult Literacy and Life Skills Survey, Australia. Summary Results – 4228.0

Shame and stigma

Relationships Australia urges that caution be used in order that education campaigns do not contribute to the stigma and shame that is already associated with gambling problems. Relationships Australia recommends that tested, key messages be adopted, such as “Remember, the house always wins!”

“Gamble responsibly” as a key message accompanying gambling promotion material implies that people who are not able to adhere to their gambling budgets and/or develop gambling problems are irresponsible, that responsibility lies entirely with the individual, and that the gambling environment, its marketing and the nature of the gambling products themselves have no share in responsibility for the problem. This contributes to stigma and shame and is a disincentive to help-seeking.

Given the proliferation of gambling opportunities in our communities, the accessibility of products, the design and speed of electronic gaming machines (EGMs) and so on, it is inevitable that gambling problems will escalate. Community awareness campaigns need to “normalise” the development of problems and encourage empathic industry and community attitudes and constructive responses.

Effects of gambling on children and young people

Relationships Australia recommends developing information kits for all families – much like those developed about drugs – and distributing them directly to households, through schools and/or issued through community based parenting programs.

National campaigns could be helpful in raising awareness about the effects of problem gambling on children and young people. Research is also showing that the harmful effects on children and young people in households where problem gambling is present is very significant and that young people who develop problems with their gambling and/or go on to become adults who develop gambling problems have often been introduced to gambling by their parents.

The proposed family information kits were recommended by the *Children at Risk Project* (2010)³ outlining risks to children. Messages proposed included:

- You may be placing your children at risk of developing gambling problems by introducing them to gambling, teaching them to gamble, allowing them to gamble at home or with friends, or gambling with them;
- The younger your children are when they first gamble, the more at risk for developing gambling problems they will be;
- The way you gamble now will influence how your children will gamble in the future;

³*Children at Risk of Developing Problem Gambling* was undertaken by the Problem Gambling Research and Treatment Centre – a joint initiative of the Victorian Government, University of Melbourne and Monash University 2010

- Your gambling behaviour will affect what your children think they will get out of gambling in future;
- Seeing you gamble may put your children at risk of developing gambling problems by teaching them that gambling might make them feel better, that gambling might help them be accepted by their peers, or that they might be able to win from gambling; and
- Teaching your children that gambling can have many negative consequences may reduce the risk of your children developing gambling problems.

Supporting significant others

Relationships Australia recommends that public education campaigns provide information to support those who know or may come into contact with people with a gambling problem.

As indicated in the recently released *Gamblers at risk and their help seeking behaviour*⁴ report, a large percentage of gamblers who experience difficulty with controlling their gambling seek support from non-professional sources such as family, friends, work colleagues and community leaders.

Relationships Australia (SA) has recently held two focus group consultations with:

- 18 clients who have had a gambling problem; and
- 14 significant others of people with a gambling problem.

Significant others may be able to exert meaningful influence over a gambler showing early signs of problem gambling if they, like health professionals, had sufficient information about it. National community education campaigns that target this cohort (who may often be aware that a person close to them is gambling but not be aware that a gambling problem has developed) can contribute to the early identification of gambling difficulties and thereby minimise potential harm. Campaigns raising awareness about the hidden nature of gambling problems would provide indicators of what to watch for, provide guidance on how to respond and indicate where people can seek free help.

Mandatory codes of practice for advertising and enticement

Relationships Australia believes that gambling providers should not use socially irresponsible marketing strategies that target vulnerable groups of people.

This includes, for example, targeting people who live alone, and enticing them to 'join the party' or experience 'connectedness'. The advertising industry regulator should be alert for advertising that targets vulnerable people and could result in significant harm. The Tasmanian Gaming Commission is replacing some voluntary practices in this area with mandatory codes of practice.

⁴ *Gamblers at Risk and Their Help Seeking Behaviour* is a recent study undertaken by the Centre for Gambling Education and Research, Southern Cross University 2011

Intervention and treatment strategies

Relationships Australia believes that a number of factors need to be taken into consideration when developing and implementing intervention and treatment strategies. These include:

- Emerging concerns about the use of internet gambling, sports betting and the role of social media;
- The skill level and professional development of health and allied health professionals and the associated need for specialist help services;
- Counselling and support for people who gamble and their family/supporters;
- The need for individual responses and case-management services as many people who gamble are dealing with a multiplicity of problems, including mental health issues;
- The importance of effective training for gambling staff;
- The role that inducements play in encouraging gambling;
- Self-exclusion systems that are reliable and effective;
- The problems associated with easy access to credit; and
- The importance of national data collection.

It is crucial that there is continued funding for gambling help services that assist people with, and those affected by problem gambling. Professional staff at these services, such as those provided by Relationships Australia, have been extensively trained in intervention methodologies specifically developed to assist people with problem gambling and their families. People with gambling problems are not a homogeneous group, and services must be responsive to the specific needs of different groups: Aboriginal and Torres Strait Islander people, those from culturally and linguistically diverse backgrounds, youth and those with mental health or intellectual disabilities.

Relationships Australia believes that a coordinated approach in the funding of gambling help services by the Commonwealth and various State/Territory Governments is important. Coordination is required in order to avoid the creation of service gaps and duplications, as well as confusion for people seeking help and those referring to gambling help services. Recently, for example, the Commonwealth released funding for gambling help related financial counselling. Whilst additional assistance is welcome, this release of new services in some areas actually duplicated existing financial counselling attached to state funded gambling help services.

Growth of internet gambling and sports betting and the use of social media

There are emerging concerns for people engaging with internet gambling and sports betting. While the number of people accessing Relationships Australia services identifying on-line gambling related problems is currently small (approximately 3-4%), the impact of those problems is no less devastating – one client accumulated debts to \$2.4million through on-line sports betting.

According to Gainsbury and Blaszczynski (2011)⁵ sports betting is Australia's fastest growing form of gambling, attributed to increased popularity of online gambling. Their research indicates that users of gambling sites on the internet are a more diverse group than previous studies have suggested; they are more involved gamblers, participating in more forms of gambling and gambling more frequently. Participants in their research study expressed concerns that on-line gambling is too convenient, more addictive and is an easier facility in which to spend more money. The study shows that in the majority of cases, gambling problems start after gambling online and that internet gamblers are less likely to seek help.

The rapid growth in the use of social media also raises concerns, with websites such as Facebook and Twitter contributing to the accessibility and uptake of online gambling services. In addition, the convergence of gambling, the growth in mobile gaming and social networking have led to the development of money-free gambling themed games on social media websites aimed at adolescents and containing advertising links to real money gambling websites.

This raises challenges for both consumer protection and client engagement. Utilising the on-line and social networking environments to provide education, harm minimisation messages, self-help materials, and easy access to help services is paramount, along with raising awareness about the potential harms caused by these forms of gambling in other education campaigns. Exclusion and red flag strategies can be utilised in the online environment.

Education of health professionals

Much work still needs to be done to ensure that primary health care professionals have sufficient awareness and knowledge of the effects of problem gambling to be able to identify gambling related issues among people seeking help. An issue that has been raised by clients when problem gambling has been disclosed to a GP is the subsequent referral to a psychologist via a mental health plan. Clients have reported in several cases that the psychologists they were referred to did not know much about gambling issues and that they were charged fees over and above the Medicare payment which they found difficult to pay when their gambling had caused them financial hardship.

While referral to the free local gambling help service (which often includes access to financial counselling) would be preferable, it also calls for improved initial and on-going training and practice of allied health care professionals.

Adequate, indexed and secure funding for gambling help services is required to ensure the growth of a qualified and skilled workforce.

Improved specialised assistance

There is a need for an additional investment in counselling and evidence-based therapeutic interventions for people with severe gambling problems and significant mental health issues who find recovery of control over gambling very difficult, irrespective of the gambling help service and treatment approach.

⁵ Gainsbury and Blaszczynski, 2011 National Association for Gambling Studies Conference

This might take the form of low cost, long-term, gambling specific, residential rehabilitation facilities located away from all gambling outlets, or long term in-hospital care. For example, a current client with significant mental health issues and in severe distress as a consequence of her uncontrolled gambling has had multiple hospitalisations for self-injury and suicide attempts over the past six months, including a recent attempt to set fire to her hands so she could stop stealing money to gamble. She has been through a revolving door of numerous short term hospital stays. She (and other clients like her) needs a safe, well-managed facility where she can be contained, stabilised and has adequate time and counselling support to recover and re-engage with a healthy and meaningful life.

Overall a service system that covers the spectrum of primary, secondary and tertiary interventions is urgently required. Within these areas of intervention a continuum of care options is needed to provide easy pathways to tailored and integrated responses.

Multiple, complex issues require collaboration and client-focused and case-managed services

Often gambling co-exists with family violence, mental health issues and/or substance abuse. Many clients are also dealing with grief and loss, social isolation, relationships separation and issues of acculturation and racism. Stigma, as well as discrimination, around many of these risk factors needs to be addressed within a population health approach that is strengths-based and recognises the importance of social and cultural factors contributing to the health and wellbeing of the individual, family and community.

Gambling help services should provide a place-based, client-centred and case-managed service response that effectively supports individuals, families and communities to move beyond their gambling-related problems to experience improved levels of health and well-being. While for some clients this work is brief, for others it is long-term and vital to helping people establish meaningful lives and contributes significantly to relapse prevention. Focusing solely on problem gambling as individual pathology within these contexts is not helpful as it adds another layer of shame and deficit. This is not to say that targeted treatments or interventions are not beneficial, and indeed sometimes essential, however it is important to develop an understanding of the whole person and their experience, their strengths, values, and aspirations, as well as their vulnerabilities within their familial, cultural and social contexts.

Collaborative partnerships between agencies (government and non-government) are essential if a gambling client with multiple, complex, issues is to be effectively assisted.

Training gambling staff

South Australia offers an effective model when it comes to early intervention and gaming staff training. This model could be used in other states and territories.

The Adelaide Casino, the Australian Hotels Association and Clubs SA have all created initiatives to support gaming staff to comply with the Codes of Practice. They focus on identifying gambling behaviours that may be indicative of a problem; responding appropriately to the patron through engagement, interaction and referral; and building and maintaining positive relationships between venues and gambling help services.

Relationships Australia (SA) developed the *Consumer Voice* program, providing opportunity and training for people who have overcome problem gambling to tell their story to a range of audiences, including gaming staff within venues, as part of their training.

These programs have worked closely together, contributing to a real shift in industry culture as gaming staff come to understand the reality and complexity of problem gambling in people's lives. Speakers' stories humanise the issue and change attitudes; speakers are empowered by contributing to the community's growing understanding of the problem and efforts to reduce the shame and stigma associated with it.

Providing venue staff with the responsibility to attend to the behaviour of their patrons requires them to interpret what they see. Getting to know customers and looking for changes in behaviour is the current focus of this work. However, an area requiring further consideration in relation to possible gambling harm is the frequency and length of time people spend gambling. While it is difficult to determine an amount of time that fits with our general understanding of gambling as an 'entertainment' (it is easy to spend a large amount of money in a very short time), the practice of people regularly spending many hours involved in gambling and rationalised as 'entertainment' needs to be challenged.

Regulation of inducements to gambling

Relationships Australia recommends the mandatory regulation of the practice of offering inducements to gamble.

Clients report that the availability of free food and drinks to hotel gambling patrons, free transport, tickets to concerts and other entertainment events, tracking and rewarding usage via loyalty program data all contribute to their frequency of play and the development of problem gambling. Jackpots and linked jackpots can keep gamblers playing longer than they intended, spending more money than they have budgeted for or can afford – indeed some clients have described spending many hundreds of dollars more than a jackpot is worth in their effort to win it.

Self-exclusion

Many clients use barring as a tool to prohibit their gambling and experience frustration when this does not work for them. There are numerous cases where clients breach barrings that go unnoticed by the venues. Implementation of a mandatory pre-commitment system would facilitate an effective barring process that is not reliant on transient staff looking through albums of photographs in the hope of recognising a barred patron, though the proposed scheme only relates to EGMs and not to other forms of gambling that may be available in any one venue.

An alternative, effective mechanism needs to be found. A former problem gambler in the focus group consultation, whose work required him to travel widely within the state, expressed frustration over the fact that he could not be barred from every gambling venue in the state. He said, "... if they'd asked me to wear some kind of anklet that I

couldn't remove for an agreed period of time that would alert gaming staff in all venues in a discreet way that I was barred, I would have complied".

Credit

Ready access to cash and credit for people compelled to gamble contributes significantly to gambling problems and consequent financial distress for gamblers and their families. Much needs to be done to curtail this access and credit providers preying on the vulnerable. The Tasmanian Gaming Commission has introduced new rules for this in response to the problem.

Can the practices of businesses that support gambling be regulated? Some pawn brokers receive the same goods repeatedly from the same person, or indeed a wide range of goods including new products still in their unopened boxes; credit providers continue to advance credit to people on a regular basis in spite of their demonstrated struggles to repay the debt; telecommunications providers issue multiple mobile phones on plans to an individual - one client obtained seven mobile phones on plans from the same provider (which she pawned as new items) without question or consideration of a gambling problem needing to be addressed.

Regulation would require these providers, as for gaming staff, to also become active in identification of gambling problems and participate in early intervention and referral.

Data collection and evaluation issues

Relationships Australia supports the implementation of a national data system for collection of consistent information relating to service access, client profiles, support needs and outcomes achieved through prevention campaigns, industry vigilance and gambling help services.

Thank you for considering the issues raised in our submission.

Yours sincerely,

Alison Brook
National Executive Officer