

Information Sheet: Responsible Gambling in Australian Casinos

The Australasian Casino Association commissioned Gambling Compliance Ltd to produce an executive analysis of the responsible gambling initiatives that have been implemented by Australian casinos since 1999 when the Productivity Commission released its report into Australia's gambling industries.

Gambling Compliance, in the report - **Australian Casinos: Responsible Gambling Initiatives 1999-2008** - has this to say about the Australian casino industry:

"The harm minimisation and responsible gambling framework that Australian casinos operate in, is world leading in its scope, consistency and implementation. This has been illustrated on a number of occasions by TABCORP being rated as the global leader in the promotion of responsible gambling by the Dow Jones Sustainability Index. Further in 2008 the Victorian Commission for Gambling Regulation (VCGR) found that Crown Melbourne is recognised as a world leader in the promotion of responsible gambling when considering the renewal of the casino licence in Victoria...."

While the Australian casinos have implemented many initiatives in response to findings contained in the last PC report, some initiatives actually pre-date the PC report, indicating that Australian casinos have a long history of commitment to responsible gambling policies."

The Key Findings to emerge from the report are as follows:

1. Casinos have seriously considered and responded positively to the Productivity Commission's findings from its 1999 report.
2. Casinos have complied with all state and territory government initiatives in the wake of the Productivity Commission's 1999 findings.
3. In some instances casinos have taken measures before government initiatives have been implemented.
4. There is a demonstrated ongoing commitment to responsible gambling by Australian casinos. Since 1999 there has been no expansion in the number of casinos, yet there has been a rapid expansion in the responsible gambling initiatives implemented since that time.
5. There is a continued commitment to staff training to ensure that all measures are taken to prevent and treat problem gambling.

The Executive Analysis by Gambling Compliance Ltd is attached.

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Executive Analysis

GamblingCompliance have been commissioned to produce an executive analysis of the attached responsible gambling/harm minimisation report prepared by the Australasian Casino Association and comment on the initiatives implemented with reference to findings of the 1999 Productivity Commission (PC) inquiry.

The harm minimisation and responsible gambling framework that Australian casinos operate in, is world leading in its scope, consistency and implementation. This has been illustrated on a number of occasions by TABCORP being rated as the global leader in the promotion of responsible gambling by the Dow Jones Sustainability Index. Further in 2008 the Victorian Commission for Gambling Regulation (VCGR) found that Crown Melbourne is recognised as a world leader in the promotion of responsible gambling when considering the renewal of the casino licence in Victoria.

The initiatives outlined in this report show that while the Australian casinos have implemented many initiatives in response to findings contained in the last PC report, some initiatives actually pre-date the PC report, indicating that Australian casinos have a long history of commitment to responsible gambling policies. Moreover, the initiatives contained in this report which post date the PC report of 1999 can be divided into two general categories:

1. Those that have been introduced independent of regulatory or legislative initiatives, and
2. Those that have been introduced as a result of legislative or regulatory changes.

Key Findings

- **Positive Response to Productivity Commission Findings in 1999.** Casinos have seriously considered and responded positively to the PC's findings.
- **Compliance with State and Territory Responsible Gaming Legislative Initiatives.** Casinos have complied with all state and territory government initiatives in the wake of the PC's 1999 findings.
- **Pre-Emptive Action in the Absence of Government Initiative.** In some instances casinos have taken measures before government initiatives have been implemented, for example Crown has Play Safe in operation which allows Crown Club Members to set time and spend limits for their gaming machine activity.
- **Commitment to Responsible Gambling.** There is a demonstrated ongoing commitment to responsible gambling by Australian casinos. Since 1999 there has been no expansion in the number of casinos, yet there has been a rapid expansion in the responsible gambling initiatives implemented since that time.
- **Staff Training To Ensure Gaming Is Conducted Responsibly.** There is a continued commitment to staff training to ensure that all measures are taken to prevent and treat problem gambling.

How the Industry Has Responded

The Australian casinos have worked closely with their respective state and territory governments to ensure that the concerns raised in the PC's 1999 report have been addressed. In many instances casinos have gone further, and through extensive staff training and self regulatory measures a responsible gaming culture has been maintained and furthered.

Information about the "price" and nature of gambling products (especially gaming machines)

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

A pertinent example of the information provided is the awareness campaign in Victoria which spells out that 'In the end the machine always wins'. Examples such as this are available in every casino in every jurisdiction.

Another example of this commitment to provision of information is TABCORP's engagement of KPMG to provide an annual independent audit to ensure adequate provision of information relating to gambling products and compliance with legislation.

Further, in Western Australia Burswood Entertainment Complex has introduced Electronic Gaming Information Terminals that display information about the chances of winning on various casino games and also responsible gambling.

The Australian casinos are not alone in this approach. The Gaming Technology Association (GTA) has circulated information to gaming machine venues relating to the functionality of gaming machines explaining 'why players cannot expect to win over the long term'. The GTA also provide factsheets regarding gaming machines stating 'the chance of NO PRIZE on an individual line is around 9 in 10'.

Information about the Risks of Problem Gambling

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.

In Western Australia the Responsible Service of Gambling (RSG) website was launched with detailed information and assistance dealing with problem gambling. The casino also operates under a Responsible Gambling Code of Practice which provides for the display of signage and brochures in major public traffic areas.

Problem gambling information has been delivered taking into account the multi-cultural nature of casino clientele. For example, TABCORP has problem gambling information in its

code of conduct in 9 different languages. Similarly, in South Australia the Responsible Gambling Code of Practice requires that information in relation to responsible gaming be made available in 6 different languages.

The world's first on-site responsible gaming support centre was initiated by an Australian casino. In 2002 Crown launched the Crown Responsible Gaming Support Centre, a world first initiative. A similar service was subsequently adopted in the Canadian province of Manitoba.

Many jurisdictions require warnings regarding the risks of problem gambling on gaming machines. Some jurisdictions have legislative measures while others do this on a voluntary basis.

In South Australia the Responsible Gambling Code of Practice requires that a warning message be displayed on the cabinet with a helpline sticker. It is also compulsory to have warnings on machines in NSW, while Queensland's appendix to the Gaming Machine National Standard requires player information displays to be accessible on the screen.

The Burswood Entertainment Complex displays help-line information on machines on a voluntary basis.

Controls on Advertising and Increased Awareness Campaigns

Most state and territory governments have provisions restricting the promotion of gambling and all of the casinos have adopted self regulatory measures to complement these legislative measures.

Examples of legislative measures, are illustrated by the approach taken by NSW and Victoria, where Australia's two largest casinos are located. In NSW, It is condition of a casino licence that the casino operator must not publish any advertisement relating to gaming machines. In Victoria any gaming machine advertising outside the boundaries of the casino is prohibited.

In South Australia Sky City Adelaide has an advertising code of practice which was mandated by legislation¹. A similar responsible marketing and advertising policy applies in Sky City's Darwin casino.

The measures to control advertising are not just directed at venues, but also apply to the manufacture of machines. For example it is noted under the NSW appendix to the Gaming Machine National Standard that the manufacturer must ensure that the equipment is designed such that the machine display is not used by a venue for unauthorised advertising or promotional purposes.

To complement legislative measures all casinos have self-regulatory measures in relation to advertising. Often these are contained within the overall responsible gambling code for a casino. For example, under the Responsible Gambling Code of Practice for Burswood Entertainment Complex there are comprehensive provisions under section 9.1 which relate to responsible advertising.

TABCORP's responsible gambling code of practice which applies at all of its casinos and has been adopted as an approved code by the VCGR. It is available in 9 different languages and has extensive provisions in relation to advertising².

In addition to controls on advertising, since 1999 all State Governments have expanded exponentially awareness campaigns regarding the risks of problem gambling with advertising on prime time TV, print media, trains, buses and billboards. There have been a number of campaigns which have portrayed the message “in the end the machine will win”³. This has contributed to a growing awareness concerning the risks of Problem Gambling.

Availability of ATMs and Credit

All casinos have ATMs placed in secure and safe areas, outside the licensed gaming footprint of the casino. In all jurisdictions the location of ATMs has met the requirement of approval by the relevant consent authority. ATM locations have been utilised in all casinos to further responsible gambling awareness messages and treatment programs.

In some jurisdictions, a limit is imposed upon the amount that may be withdrawn in a single transaction. Victoria, for example, has implemented legislation that provides that no ATM will be allowed within 50m of any entrance to the gaming floor of the casino unless it can limit the amount a customer can withdraw to a total of \$400 cash within a 24 hour period.

While some jurisdictions have express legislative measures, Western Australia’s code of ethics and gaming practice provides that ATMs must be located outside the casino gaming area. In July 2008 the Gaming and Wagering Commission implemented a policy regarding the positioning of ATMs within Burswood Entertainment Complex. ATMs must not be in the area to which the casino gaming licence refers to; or within 40m of any entrance to the gaming floor unless the ATM restricts a person to a cash withdrawal of \$400 daily on any debit or credit card.

In all states and territories extending credit is prohibited in casinos for non international VIP customers.

Lack Of Pre-Commitment Options Including Self Exclusion Arrangements

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.

Self-exclusion programs allow patrons to exclude, or ban themselves from entering the gaming area of a casino. Some casinos such as Burswood Entertainment Complex also have third party exclusion programs in place whereby family members or other third parties can apply to have a person excluded. Similarly, in Tasmania and South Australia third party exclusion are also possible. In Victoria exclusion schemes need to be approved by the regulator. Generally, exclusion review procedures are in place, information packs are available and importantly staff training is an integrated aspect of casinos’ self exclusion programs.

Many casinos have had self exclusion procedures and policies in place which both pre-date the 1999 PC report and in some cases, statutory requirements. For example, Star City’s self exclusion program has been in operation since the casino opened in September 1995. In contrast “self exclusion” was first mentioned in legislation/regulations after the PC 1999 report: the Registered Clubs Amendment (Responsible Gambling) Regulation 2000, the Casino Control Regulation of 2001 and Gaming Machine Act of 2001 were among the first such NSW statutory instruments to contain the term.

Pre-commitment is a term used to describe responsible gambling initiatives which allow players to set spending limits away from a gambling environment. Australian casinos have led the way in pre-commitment initiatives. Crown Melbourne was the first casino in the world to address and trial pre-commitment. Crown Melbourne's Play Safe was introduced in 2003 and the program allows members to set, in advance of play, individual time and spend limits relating to their gaming machine activity. There is a current legislative timetable for a Victoria wide use of pre-commitment technology, with first stage implementation by the end of 2013, and a more stringent regime by 2015-16.

SKYCITY Adelaide has also implemented a pre-commitment initiative with respect to self-excluded patrons. If a patron wishes to have their self-exclusion lifted, they will need to pre-commit to a spend and visitation limit, along with meeting other requirements which includes counselling.

Currently a number of states are considering pre-commitment initiatives. GamblingCompliance understands individual casinos are engaged on this issue with their respective state and territory governments.

New technologies have been said to be important in developing pre-commitment responsible gambling strategies further. However, the role existing technologies and practices can play in furthering pre-commitment choices by patrons should not be overlooked. Some jurisdictions and casinos have already implemented initiatives since the 1999 PC report, which are in themselves important facets in a pre-commitment and spending-limit mindset, by requiring players to make a choice as to their spending capacity. Some of these have included:

- Restricted limits on withdrawals from ATMs
- Paying certain winnings by cheques
- Systems have been trialled that allow customers to set monetary and time limits on their gambling
- Approved ticket in ticket out technology in NSW. The ticket in ticket out (TITO) systems in NSW can foster pre-commitment choices by requiring players to make a choice as to spend-limits on gaming before engaged in the gaming activity.

A Commitment to Responsible Gaming

Australian casinos are required to conform to responsible gambling measures – either mandated by their respective regulatory authorities, voluntarily through state industry codes or company codes, or through property specific policies. Many casinos self report on their activities thus reducing the burden on regulators and law enforcement agencies and consequently providing greater confidence in their activities. This varies from jurisdiction to jurisdiction.

TABCORP casinos in NSW and Queensland follow the TABCORP Responsible Gambling Code of Practice. TABCORP's casinos in Queensland are also required to adhere to the Queensland Responsible Gambling Code. SKYCITY Adelaide adheres to both a mandated Responsible Gambling Code of Practice and an Advertising Code of Practice. Similarly in

Tasmania Wrest Point and Country Club Tasmania casinos follow a strict company developed Marketing Code of Ethics. In 2005 Burswood released its own Responsible Gambling Code of Practice. This year Crown will introduce its own “Responsible Gambling Code of Conduct”.

This commitment to responsible gambling measures has not been without recognition with Australia’s two largest casino operators commended for their measures. TABCORP has been rated by the Dow Jones Sustainability Index as the global leader in the promotion of responsible gambling. In 2008 the independent review and report by the Victorian Commission for Gambling Regulation to the Victorian Minister on the suitability of the Casino Operator to continue to hold the Melbourne Casino Licence, as required by the Casino Control Act 1991 (Vic), found that Crown Melbourne is recognised as a world leader in the promotion of responsible gambling.

Since 1999 additional specialist responsible gambling staff have been employed in a number of Australian casinos to deal specifically with any responsible gambling issues that may arise. Examples are as follows:

- Burswood has a Community Relations Manager who heads up a Responsible Service of Gambling Team which includes a qualified psychologist.
- Casino Canberra has employed Gambling Contact Officers who are available at all times during opening hours.
- Lasseters Hotel Casino has trained Gambling Liaison Officers.
- SKYCITY casinos in Darwin and Adelaide have Host Responsibility Managers.
- Reef Casino in Cairns has a Responsible Gambling Manager and Responsible Gambling Liaison Officers.
- Crown Entertainment Complex in Melbourne has established an onsite Responsible Gambling Support Centre. Crown’s centre also has a chaplaincy service on call.
- TABCORP casinos in NSW and Queensland employ Responsible Gambling Managers and Liaison Officers.

Responsible gambling measures taken by the casinos do not just relate to preventative measures. Indeed there is a strong emphasis on commitment to treatment of problem gambling. The casinos have forged strong partnerships with counselling services and organisations such as Lifeline, the Salvation Army, Amity, GABA, Relationships Australia, Anglicare, Break Even, Wesley Gambling Counselling Services and various gambling helpline providers. These counselling services are promoted throughout the respective casinos.

The Role Of Self Regulation Since 1999

One of the findings of the PC’s 1999 report stated that with respect to responsible gambling policies:

“self-regulatory approaches are unlikely to be as effective as explicit regulatory requirements. In most cases, regulation can be designed to enhance, rather than restrict consumer choice, by allowing better information and control”.

The practical experience of the last ten years has illustrated how self regulation can complement regulatory requirements. In some instances regulatory requirements have taken longer to implement and come online than industry generated initiatives; and it has been these self-regulatory responses that have played a key role in bridging a 'regulatory lag' in responsible gambling policy and its further development.

For example, some self-exclusion initiatives were in place prior to self exclusion mandated by legislation. The recent announcement by the Victorian government of its pre-commitment initiative, once in effect, will be 10 years after Crown Melbourne's pre-commitment initiative began.

Australia's casinos differ in size and capacity. The over 200 initiatives which have been introduced since 1999 reflect this diversity in local conditions and illustrate that a one size fits all approach is not necessarily applicable with regard to the implementation of responsible gambling measures. Local conditions including self regulatory codes of conduct, staff training and responsible gambling initiatives in place, as well as the degree of regulatory oversight imposed by state and territory governments need to be considered when looking at what is appropriate for a casino and its community.