

Submission to the Independent Pricing and Regulatory Tribunal of New South Wales

Review of Gambling Harm Minimization Measures

Introduction

The Australian Casino Association (the Association) appreciates the opportunity to respond to the call for submissions issued by the Independent Pricing and Regulatory Tribunal into the Review into Gambling Harm Minimisation Measures and the issues raised in the Issues Paper.

About the Australian Casino Association and the casino industry

The Australian Casino Association represents the combined interests of the casino sector in Australia and has been in existence since 1992. There are thirteen casinos in Australia. The Association's national office is in Canberra and it is governed by a National Council consisting of the CEOs of the casino operators as well as a representative from Christchurch Casino in New Zealand.

Every casino actively promotes responsible gambling through a range of programs in each property. The Association formed a Responsible Gambling Taskforce in 2001 to co-ordinate an industry wide response to issues regarding responsible gambling and to promote best practice in the industry, as well as be a resource for the organisation and the National Council.

The casino sector makes a sizeable contribution to the Australian economy. Its key performance indicators for 2001-2002 included:

- Gross revenue of \$3,134.3 million and value added of \$2,154 million
- Gaming revenue of \$546 million from international commission players and international rated players
- Purchasing inputs worth nearly \$1,000 million
- Paying \$500.8 million in gambling taxes
- Contributing \$36.9 million in community support funding
- Employing 19,657 people and paying \$724 million in wages and salaries
- Welcoming nearly 40 million visitors

Australian casinos are destination gaming venues. In the main visitors to a casino have made a conscious decision to travel to the casino (rather than a gaming venue that may be nearer to their home or workplace). However, for some people their visit may not include gambling, because casinos are multi-faceted entertainment complexes. In addition to gambling facilities, casinos offer a wide variety of dining experiences, theatrical productions and shows, retail stores as well as other forms of entertainment. Our casinos provide over 3000 international standard hotel rooms. Australian casinos are an important part of Australia's tourism infrastructure. They attract conferences, conventions and other functions to their properties. Casinos are very much at the premium end of the business tourism sector which contributes substantially to the Australian economy.

Responsible Gambling Not Harm Minimisation

The Association is of the firm view that the emphasis of all regulation should centre on ensuring that responsible gambling measures are in place, are effective and of real benefit to gamblers, the industry and the community.

Responsible gambling occurs as a result of collective actions and shared ownership by individuals, communities, the gambling industry and Government. It occurs in a regulated environment where the potential for harm is minimised and people can make informed decisions about their participation and the extent of their gambling activities.

Responsible gambling refers to an approach to gambling that encourages consumers to make informed and educated choices. Responsible gambling also involves the use of initiatives that contribute to improving the health and wellbeing of people who may be adversely affected by their gambling behaviours.

The main objective of any regulatory framework should be to ensure that strategies are in place to:

- a) Minimise the incidence of problem gambling by aiming to prevent consumers at risk from developing problems with their gambling.
- b) Reduce the prevalence of problem gambling by assisting people who may experience a problem associated with their gambling behaviour.

The following principles should form the basis of any regulatory framework:

- a) Consumers have freedom of choice regarding their gambling options.
- b) Consumers should have the opportunity to make informed and responsible choices prior to and during a gambling session.
- c) Problem gambling behaviours are not uniform and strategies to reduce incidence and prevalence must be based on an understanding of different "pathways" and profiles that lead to gambling problems.

- d) Intrusive measures should not be implemented unless guided by research that clearly supports the practice as a valid initiative to assist problem gamblers.
- e) Addressing problem gambling is the shared responsibility of individuals, industry, government, community groups, treatment providers and others.
- f) It is critical that outcomes and progress in dealing with and overcoming problem gambling be guided by research and evaluation.

Australian casinos operate in total compliance environments; they are subject to stringent regulatory controls. In addition, our members are required to conform to responsible gambling measures – either mandated by their respective regulatory authorities, voluntarily through state industry codes, company codes or property specific policies.

Scope of the Review

IPART has raised a considerable number of issues in its scope of review and the Association considers that many of these issues are more relevant to other sectors of the gaming industry rather than to the casino industry. The Association wishes to offer its opinion on selected issues raised in the scope of the review.

(1) Smoking – A Public Health not Responsible Gambling Issue

The Association believes that the regulation of smoking is a public health issue and therefore does not see the relevance of smoking to IPART's Inquiry.

(2) Community Benefit Funds – Effective Evaluation of Programs to Assist Gamblers with Problems

In 2001-02 the industry contributed \$31.8 million in community benefit levies (\$28.3 million in 2000-01). However, Australia's casinos support community activities over and above prescribed levy payments. In 2001-02 the industry contributed an additional \$5.1 million to community activities, giving a total community contribution of \$36.9 million.

The Australian Casino Association considers that accountability and audit measures need to be put in place to evaluate the effectiveness of the programs and vast resources which are given to the community sector to assist those people who find their gambling behaviours have become a problem. For example, patrons requiring assistance with gambling problems may require this assistance outside of regular working hours and, in the experience of our members, counselling and support services are often unavailable when assistance is most required (that is at the time the person makes the decision to seek assistance).

(3) Reducing maximum bets, limits on note acceptors and other alterations to Electronic Gaming Machines (EGMs)

The Association is concerned about the prevalence of a view that modifications to electronic gaming machines are the panacea for preventing problem gambling. The

Association considers it is very important to undertake structured, relevant and valid research into the effectiveness of such measures on patrons' behaviour as often those with problems will find ways to circumvent the measures which can lead to increased spend and time spent playing machines and defeat the purpose of such measures.

(4) Availability of alcohol and other refreshments to gamblers

The Association is committed to ensuring that customers who become unduly intoxicated are not permitted to continue gambling and its members have zero tolerance of this behaviour. All members of the association comply with the requirements of liquor licensing regulations which apply in their States and follow Responsible Service of Alcohol practices. Training regarding individual and company responsibilities, in relation to gambling and the service of alcohol is provided to relevant staff members.

Complimentary non-alcoholic beverages, including tea and coffee are served to customers at some of our member properties.

For example, Star City does not provide complimentary alcohol to the general public at gaming machines or tables. Patrons may purchase drinks through food and beverage staff who take orders periodically. Complimentary soft drinks, tea and coffee are provided to electronic gaming machine players. High-level players using loyalty cards can obtain complimentary drinks but most opt for non-alcoholic beverages. Star City believes these services are responsible and should not be viewed as an inducement to gamble.

SKYCITY Adelaide has a policy that alcohol is not supplied as a reward for continued play. Furthermore, intoxicated persons are prevented entry into gaming areas and are prevented from gambling.

In the Northern Territory it is against the law to serve intoxicated persons. The Northern Territory Liquor Act states, "A licensee or employee of the licensee shall, or an inspector may, exclude or remove a person, not being a bona fide resident of the licensee's licensed premises, from the licensed premises if the person is intoxicated.

Liquor licences, issued under the provisions of State legislation, require compliance with the relevant liquor licensing laws which have serious penalties and consequences for non-compliance, including fines as well as the possible suspension or loss of the liquor licence.

There are some variations in liquor licensing law between the various States and Territories. For example, in Victoria a licensee must not supply liquor to a person in a state of intoxication and must not permit drunken or disorderly persons to be on the licensed premises. However, it is not an offence if the intoxicated person remains on the licensed premises. The liquor licensing laws in NSW, on the other hand, do not contain a category of "drunk" and only make reference to "intoxicated" persons – the presumption being that the Victorian term of "drunk" is equivalent to the NSW term of "intoxicated".

Casino operators are very conscious that, in addition to the actual laws that apply, persons affected by alcohol can impact on the enjoyment of other patrons which, in turn, can impact on the casino business.

(5) Performance of self-exclusion schemes

The Australian casino sector acknowledges that governments and the community are concerned about the incidence of problem gambling in our community. The Association believes that only through a national industry wide approach can Australia's casinos seek to provide a realistic response to issues of concern.

The Association's National Framework on Self-Exclusions will ensure a national approach is adopted by all of Australia's casinos. The casino industry in Australia is a world leader in the adoption of responsible gaming practices by:

- **Provision of Information**

All casinos display at prominent points in their properties information regarding self-exclusion and directions as to how an individual can apply for self-exclusion. Information may be available in languages other than English. These languages are determined according to individual casinos' demographics.

- **Method**

The mechanisms for self-exclusion include as a minimum, an interview with the appropriate staff member/s who will keep a record of the interview. The witness to the self-exclusion shall be from a different department to that of the staff member issuing the self-exclusion documentation. A photograph of the self-excluded person is entered on that person's file for identification purposes. All casinos encourage applicants for self-exclusions to seek some counselling by approved/accredited agencies.

Self-exclusions are for an indefinite period although it is recommended that casinos should allow for revocation of an individual's self-exclusion (after a minimum period of not less than 12 months) so long as:

- a) The individual provides proof that he/she has attended problem gambling help sessions and has references from suitably qualified practitioners indicating approval for re-admittance to a casino and
- b) This is subject to individual State regulations.

- **Sharing of data**

Subject to individual State regulations, information regarding self-excluded patrons is available to all appropriate casino personnel to ensure the effectiveness of the self-exclusion for the patron. This information will be made available to all member casinos where the patron requests that the information be made available and no mail/promotional material is sent to self-excluded patrons.

In general terms, all Australian casinos currently have a system of "Self-Exclusion" whereby a person may make application to have he or she barred from the casino (gaming floor).

The period of time of such Self-Exclusion and the process as to how the person may seek revocation of the Exclusion Order or otherwise be permitted to return to the casino may vary in some aspects from State to State or Territory.

In relation to measuring the “success”, “effectiveness” or “performance” of the self-exclusion schemes a number of points can be made.

These are:

- a) There is no defined criteria of “success”, “effectiveness” or “performance”
- b) The Self-Exclusion programs of casinos may vary very considerably from the Self-Exclusion programs of some clubs and hotels for a number of reasons including:
 - Casinos have accredited crowd controllers at all entries to the gaming floors
 - Casinos have extensive electronic surveillance procedures in place that cover the gaming floor and the entries
 - Casinos have established Surveillance Departments as well as Security Departments (both of which are alert to persons who may be Self-Excluded or Excluded)
 - Government/Gaming/Casino Authorities are advised in relation to persons who are self-excluded and have Government Inspectors deployed within the casino environments.

Other gaming venues (not being casinos) do not have such procedures and systems in place.

The Gambling Research Panel (Vic) Evaluation of Self-Exclusion Programs Report (Feb 2003) by the SA Centre for Economic Studies stated “the effectiveness of the (self-exclusion) program cannot be asserted by any person (eg Gambler’s Help or Industry) as essential information, systems and procedures to collect that information are not in place”. (p53) Crown Casino in Victoria which has the most intensive electronic surveillance system of any casino within Australia was able to show that 85% of persons who have been self-excluded had not breached their self-exclusion. It is contended that the self-exclusion program at Crown was effective for those 85% of its self-excluded patrons (who apparently stopped visits to and gambling at the casino).

Regardless of the criteria for measuring “performance” of a self-exclusion scheme, a study by Ladouceur *et al* (2000) supports the argument that there is a place for self-exclusion on the basis that it may meet the needs of at least some individuals who have a gambling problem. Further, there are some indicators from overseas programs that “when properly implemented, self-exclusion can be a valuable tool in helping to curb problem gambling” (Nowatzki & Williams 2002).

(6) A requirement for gambling venues to have natural light

One of the most frequently suggested solutions to preventing problem gambling has been to ensure that natural light may reach patrons on the gaming floor and that this should be mandatory for gambling venues. No empirical evidence is available to support the proposition that such a move provides a solution. Given the high level security and surveillance systems in place at casinos which monitor the conduct of games and play and form an essential part of the integrity of casino gaming it is highly impractical for casinos to have areas of natural light. Surveillance systems could not function as effectively with natural light or across a variation in lighting types and intensities.

(7) A requirement for gambling patrons to be visible to people outside gambling venues

The Association is given to understand that at one stage it was a requirement of design that patrons in gambling venues **not** be seen from public areas. As with (6) above no empirical evidence has been offered that provides substantive proof that opening up gaming areas to public view will assist in preventing problem gambling.

(8) Compulsory placement in gambling venues of contact cards for counselling services

The Association promotes the prominent display of information about the potential risks associated with gambling and where to get help for problem gambling in all gambling areas and near ATM and EFTPOS facilities servicing gambling areas. Posters and signs are displayed in high traffic areas of our member casinos and brochures and take away cards are also displayed in discrete locations such as toilet facilities. Whilst it may be compulsory in some casinos to display contact details for counselling services, all casinos display and provide such information as a responsible gambling initiative usually as part of a self-regulatory Code of Practice that is property specific or industry wide in a particular jurisdiction.

Posters, brochures and contact cards have been or are used within in all casinos. Whilst brochures - on the basis of the number printed and taken by the public and, in some cases, confirmed during self-exclusion interviews - are effective in conveying the message about self-exclusion and support services available; there is also evidence to suggest that contact cards (business card size) usually available in strategic locations throughout a casino, are also a very useful initiative. It has often been said that a small business/contact card can be picked up easily, discreetly and is probably the most effective communication method for the gambler. However, it must also be realised that in some cases the brochures are collected, read and acted on by friends or members of a gambler's family.

Some examples of property specific initiatives are outlined below:

- a) In a 12 month period following the introduction of the Queensland Responsible Gambling Code of Practice approximately 50,000 'Where To Get Help' business cards were distributed at Conrad Jupiters & Conrad Treasury Casinos.
- b) Star City provides information to patrons about counselling services available to assist those with gambling problems. Details of the G-line (NSW) telephone counselling service are provided in brochures and light boxes on the main gaming floor, on each electronic gaming machine, at all gaming tables and in toilets. In addition, the Department of Gaming & Racing 'Playsmart' series of brochures are available in thirteen community languages in two locations on the main gaming floor and in the private gaming room. The 'Playsmart' series also provide contact details for the G-line (NSW) counselling service.
- c) At SKYCITY Adelaide contact (business) cards are extensively available in public areas and responsible gambling posters, pamphlets and stickers are prominently

displayed in gambling areas, including stickers appearing on all machines and on or near all ATM's They are printed in English, and translated into five other languages.

- d) At MGM Grand Darwin the following booklets, "Managing Your Gambling" (Amity), "Gaming Machines - A Players Guide" (Amity & NT Government) and "Hints for Gambling Management" (Amity) are made available to patrons at the Players' Club and at the cash desk. Posters with contact details for Amity in up to six languages are displayed across the property. The "Managing Your Gambling" booklets are the most popular. MGM Grand, along with AHA NT, Clubs NT, TAB, Amity, the Salvation Army, others and the NT Government are in the process of designing new posters, booklets and contact (business) cards that provide contact details of counselling services.

(9) A compulsory "pre-commitment card" which could be used to set self-imposed financial limits for all individuals gambling in Australia and possibly provide individuals with a record of their gambling wins and losses

Since July 1 2003, all members of a "gaming loyalty" scheme in Victoria must agree to receive at least annually, a player activity statement detailing expenditure and time on device. Should a player not agree to receive the said statement, the player is not permitted to be a member of a gaming machine loyalty scheme. In addition when players sign up for a gaming machine loyalty scheme, they must be offered the option to set time and/or expenditure limits on their card.

The introduction of a national compulsory "pre-commitment card" will simply be seen to be a de facto registration system for all gamblers and flies in the face of Australia's democratic traditions. The introduction of any scheme that includes a national compulsory "pre-commitment card" could be seen as a backdoor move to introduce a type of Australia Card.

(10) Restrictions on ATMs near gambling venues to ensure a lower than normal daily cash limit

Australian casinos rely on banking facilities such as ATMs and EFTPOS facilities to operate restaurants and retail outlets which serve many more patrons than just those who are visiting for a night on the gaming tables or playing the electronic gaming machines. EFTPOS facilities are restricted for use for the purchase of goods or services. No 'cash out' facilities are available using EFTPOS. Limiting and restricting banking facilities in areas outside the gaming footprint of a casino will have immediate and dire consequences for local employment and local economies both directly and indirectly. ATMs in Australian casinos are located outside the gaming footprint in all but one property. In the case of this one property access is permitted only to cheque or savings accounts.

Changing the current situation with ATMs on our properties will have severe negative consequences on our hotel/hospitality businesses. For example, customers may be asked for a \$200 pre-authorized surety when they check into a casino hotel. This surety is taken by either credit card or cash. When a customer is not in possession of a credit card they

are directed to the ATMs where they can withdraw cash in order to check into the hotel or pay their bill upon check out. Check out may require access to a larger amount of cash than \$200. We must not lose sight of the fact that all casinos have international standard hotels that attract tourists from all over the world. Casinos are multi-faceted entertainment venues that have numerous other activities including (but not restricted to) gaming - restaurants, bars, theatre and retail outlets.

The Association considers attempts to restrict access to banking services because it is seen as a panacea towards preventing problem gambling as being fundamentally flawed. In addition, such an approach would impact on the enjoyment of the vast majority of recreational gamblers and customers enjoying other facilities that casinos provide.

The Association has received advice that there are considerable technical difficulties in trying to implement blanket restrictions on banking facilities in gaming venues.

The Association is concerned about the effects of limiting access to funds available from ATMs because problem gamblers can find ways to access cash which could result in adverse consequences. The daily limits applied to ATMs by the banks are typically set at between \$800 to \$1000 per day. If patrons are unable to access their bank's preset ATM withdrawal limit they may find other ways to get the cash.

Anyone can request their bank to reduce their daily cash withdrawal limit from an ATM. Problem gamblers should be encouraged to take personal responsibility and request their bank to implement this safety net strategy. ATM restrictions are not a panacea for problem gambling. They are a tool that can be used to assist a problem gambler in treatment. They provide an external control mechanism for access to funds for a problem gambler who is working with a counsellor on the issues associated with their gambling behaviour.

Problem gamblers only access these types of options when they are ready to make some changes in their gambling behaviour. If they are not ready to address their gambling then no amount of external controls will prevent a problem gambler from gaining access to funds if they chose to. One of the goals of this exercise is to maximise the social and economic benefits of gambling while minimising the negative impacts and costs to individuals, their families and the wider community

A patron who may withdraw for example \$1000 in one day may use this figure as a personal limit when gambling but if they are restricted they may find other ways to get that amount or more. A patron may visit an ATM en route to a gaming venue or visit a branch of their bank to make a withdrawal only limited by their balance. This may create the effect of taking the patron beyond their regular personal gambling limit of what they are able to withdraw from an ATM.

People with gambling problems sometimes have multiple credit cards and bank accounts with ATM access. While there may be a limit on withdrawals per account, these gamblers may make many withdrawals from numerous accounts negating the argument that restricting the amount of the withdrawals is a means to assist problem gamblers.

People with gambling problems may find ways to circumvent the restrictions placed on ATM and EFTPOS facilities in gaming venues and this needs to be acknowledged by regulators and stakeholders. If gamblers are restricted to limits then they may simply withdraw their funds from ATMs outside the casino. This also raises the issue of an individual's safety as casinos are under regular surveillance and often are far safer places to withdraw money, especially after daylight hours.

In 2001 the Australian Casino Association commissioned Stollznow Research, a Sydney based market research company, to conduct a study into the attitudes of Australians to gambling and to casinos in particular. The survey was based on a large sample size of 3,000 respondents from all Australian states and territories.

The survey indicated that respondents did not consider restricting access to ATMs in gaming venues to be an effective measure in preventing problem gamblers from gambling. Those surveyed felt access to a wide variety of gaming options was one of the biggest factors in people developing a gambling problems while only 3% of respondents felt access to ATMs was a cause of problem gambling.

The survey also sought the views of respondents as to what they saw as being effective responsible gambling practices. Of those surveyed 27% indicated education of gamblers and counselling those with problems would be the most effective means of curbing problem gambling. Again only 3% of respondents felt banning or restricting the access to ATMs was a suitable or practical measure to problem gambling.

The Commonwealth Department of Family and Community Services recently commissioned KPMG Consulting to conduct a study into ATM/ EFTPOS Functions and Capabilities in relation to assisting the promotion of responsible gambling. This report may provide IPART with useful background material on this issue.

Impact of Measures – The Community's View

Again the community attitudes survey already referred to previously found that a majority of those surveyed in the order of 80%, stated that they approved of responsible gambling and regulated gambling in casinos in particular.

The leading general attitudes toward gambling included views that:

- Gambling is widely available in Australia
- Governments are too dependent on revenue from gambling to reduce gaming options
- The wide availability of electronic gaming machines is the biggest contributor to gambling problems
- There are community benefits where gambling is conducted in supervised environments.

The survey revealed that a significant number of Australians gamble regularly, be it long-odds wagering, sports betting or gambling in a casino. Since the findings of the 1999

Productivity Commission’s Report in Gambling in Australia, there has been a dramatic increase in regulations, particularly in casinos, aimed at helping problem gamblers. As part of the survey, the respondents were asked a range of questions relating to their views on how they felt people developed gambling problems, what the causes were and what solutions they viewed as effective.

There are deep-seated perceptions about why individuals become problem gamblers:

- “Problem gamblers will always find a way to gamble on something” — **89 per cent agreement**
- “People tend to want to blame someone else for problem gambling rather than the problem gamblers themselves” — **75 per cent agreement**
- “Most people don’t really expect to win when they play — although there is always the hope that they will” — **71 per cent agreement**
- “Problem gambling is a psychological problem and is not associated with a particular venue or form of gambling” — **69 per cent agreement**

Respondents felt the causes of problem gambling related more to the availability of gambling options (24 per cent), to the weak or compulsive personality of the individual (**23 per cent**), or to too many electronic gaming machines (**20 per cent**), rather than to advertising of gambling (6 per cent) or access to Automatic Teller Machines at gaming venues (**3 per cent**).

The solutions to problem gambling, said a majority of respondents, centre on educating people about gaming and counselling those with gambling problems (**28 per cent**).

Restricting the availability of electronic gaming machines was mentioned by 23 per cent of respondents, while 20 per cent mentioned reducing the number of gaming venues.

Respondents did not view limiting betting amounts, reductions in advertising or banning ATMs as effective measures to promote a widespread culture of responsible gambling in a country where so many gamble in one form or another on a regular basis.

Similarly, they felt that helping those with problems is not a quick fix that is achieved at gaming venues by the installation of clocks, restrictions on ATMs or machines, but rather through professional help.

Problem Gambling — Causes and Solutions	
CAUSES	SOLUTIONS
24% wide availability of gambling options	28% educate people about gaming and counsel those with gambling problems
23% weak or compulsive personality of the individual	23% restrict the availability of poker machines
20% too many poker machines	20% reduce number of gaming venues (hotels, clubs)
11% social or financial pressures	10% identify and restrict individual problem gamblers
11% individual greed	7% reduce trading hours of gaming venues
10% poker machine experience too much fun	4% limit betting amounts
10% individual boredom or loneliness	3% reduce advertising
6% advertising of gaming	3% ban ATMs
3% individual consumption of alcohol	15% other
3% access to ATMs at gaming venues	
7% other	

Further Measures To Foster A Responsible Gambling Environment

Initiatives

The convener of our Responsible Gambling Taskforce Mary Marquass, Responsible Gambling Manager for Conrad Jupiters and Treasury Casinos in Queensland and currently the President of the National Association of Gambling Studies (after years of experience in the problem gambling support services before joining Conrads), has developed a model that best describes the framework for any regulatory regime that promotes responsible gambling in the community. The model is attached as **Attachment I**.

Any regulatory framework should be developed from a strategy that includes prevention, protection and rehabilitation measures. It is a shared responsibility between the individual, the community, the gambling industry and governments to achieve a balance between the social and economic benefits and the costs of gambling.

I. Prevention

It is the shared responsibility of the gambling industry, state governments and the community to develop strategies to minimise the development of harmful impacts and reduce the prevalence of problem gambling.

Strategies must include developing an increased awareness and knowledge in the community of the potential impacts of gambling and the importance of responsible gambling. Industry must ensure that gambling environments provide appropriate support for patrons, while governments must ensure that the community is well informed. Education and awareness development strategies must be informed from substantive research.

Measures to be implemented should include:

- a) A national framework to promote responsible practices by operators as well as informed decision making by consumers. Framework initiatives would include strategies to ensure that gambling environments are safer and more supportive for customers specifically in the areas of advertising and promotion, product purchase information (informed choice), staff training, rules, procedures and policy to assist consumers, partnerships and alliances with appropriate treatment providers and self exclusion programs.
- b) The establishment of a national research program that not only examines the social and economic implications of gambling but also the effectiveness of various regulatory regimes in preventing, protecting and rehabilitating problem gamblers.
- c) Community education and awareness strategies ought to be aimed at the whole community. However, specific target groups could include:
 - young people, through the development of a national curriculum module in responsible gambling for use in schools *and*

- health and welfare professionals through education and training for early identification of problem gambling.

2. Protection

Early intervention strategies reduce the risk of consumers developing problems with their gambling.

It is often suggested that in addition to the compulsive, pathological gambler, there is another group of consumers who are at risk of developing a dependency to gambling. The 'at risk' group could be in the process of developing a problem with gambling and may from time to time experience difficulties as a result of their gambling behaviours.¹ In Attachment I, the 'at risk' group is identified at the 'abuse' stage of developing a gambling problem and have started to create difficulties associated with their gambling. For this group, assistance to develop new skills may be required coupled with promotion of individual self-efficacy. Industry can also play a role with appropriate staff training, rules and procedures.

Early intervention initiatives include:

- a) The promotion of partnerships to address national, state and local gambling related issues and concerns.
- b) Development of a nationally agreed system of problem gambling treatment and support services.
- c) The development of uniform data sets and problem gambling assessment tools for use by professional problem gambling treatment providers. These tools should be informed by appropriate research. Data should be collected by treatment providers and reviewed by an independent body.
- d) Outreach initiatives that provide information, screening for problem gambling, referral and brief intervention in a community setting.

3. Rehabilitation

The Productivity Commission's report, "*Australia's Gambling Industries (1999)*", identified the impacts of gambling on a continuum ranging from no adverse consequences to severe problem gambling. The Report indicated that:

"Addictive behaviour can also be viewed as being on a continuum, developing progressively from use, to abuse, to dependency. Gambling dependencies have their own idiosyncratic features. One may be able to 'use' one form of gambling – eg purchase a weekly lotto ticket whilst, at the same time they may have formed a dependency to gaming machines."

In Attachment I, it is suggested that those individuals who have formed a dependency to gambling (the compulsive, pathological gambling addicts) will often need to maintain abstinence from gambling perhaps forever and will need treatment and support services. Their partners and families will also be impacted and may require assistance.

Rehabilitation measures include:

¹ This group was identified in the Queensland Household Gambling Survey 2001 research document.

- Development of well-resourced problem gambling treatment and support services that are available to respond when assistance is sought; and that are nationally benchmarked to ensure effective delivery of services
- Investigation of treatment options to match the most appropriate form of treatment according to the individual and their “pathways” and causes for problem gambling.
- The provision of funding options to make available at least one inpatient treatment service for problem gamblers and/or their families in each State in the public health system. Currently in Australia, inpatient programs for gamblers and their families are only available *ad hoc* or through private rehabilitation services. Those individuals who may require this type of assistance are only able to access this care if they have private health cover. This is a real obstacle for many problem gamblers.

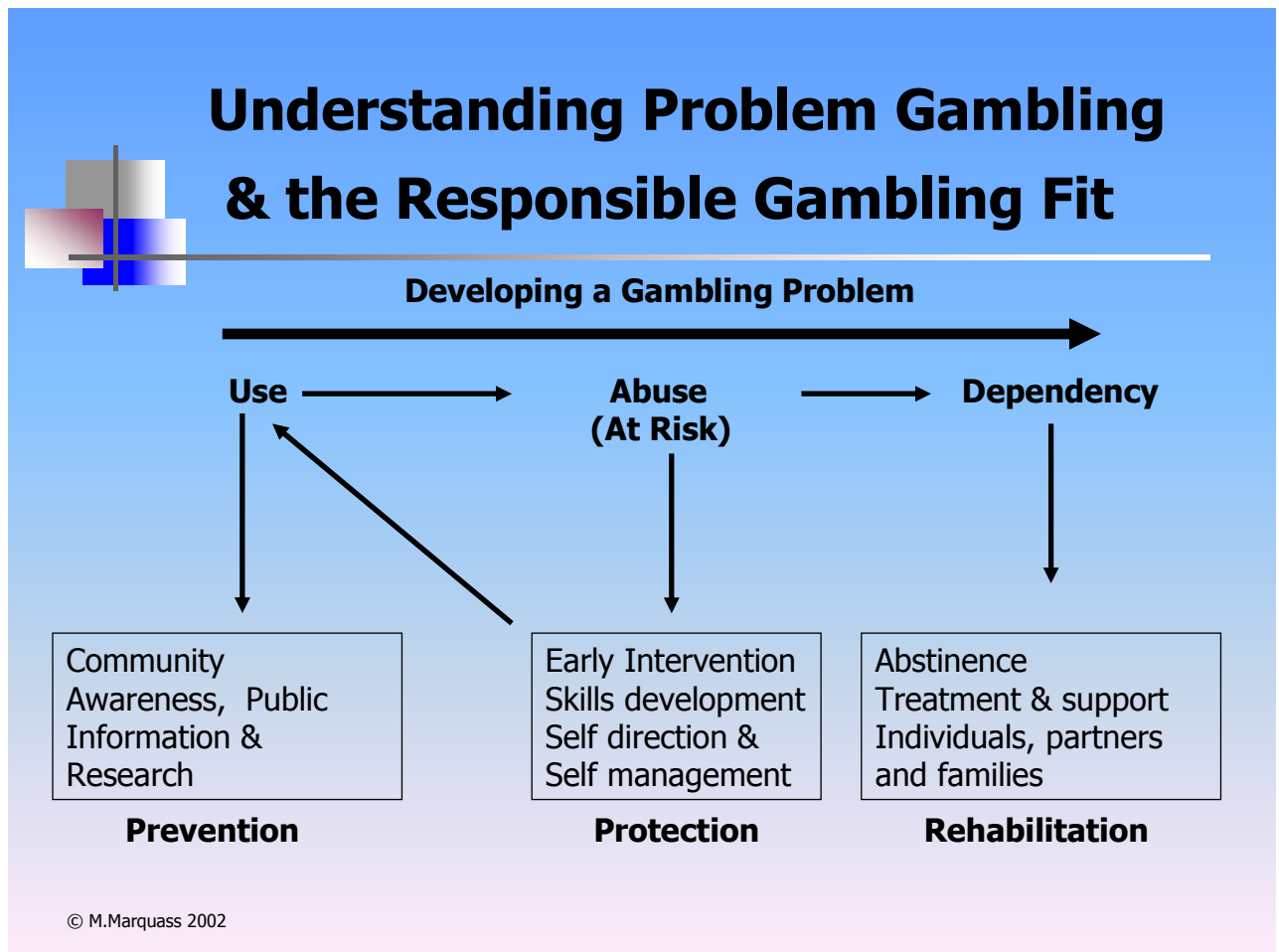
Process of Consultation

The Australian Casino Association appreciates this opportunity to comment on issues arising with this review.

The Association offers its assistance to IPART in providing informed comment on proposals that have not been canvassed in the Issues Paper but which arise in the course of consultation and receipt of submissions.

The Australian Casino Association considers governments should examine a wide range of options and measures to deal with people who suffer from gambling disorders and problems. The Australian Casino Association believes governments and decision-makers should utilise available local and international research to determine acceptable measures, which promote responsible gambling practices.

ATTACHMENT 1



Responsible Gambling involves the development of an overall strategy to address a complex issue requiring multiple solutions that include prevention, protection and rehabilitation initiatives. It is a shared responsibility between individuals (taking personal responsibility), the community, the gambling industry and government to achieve a balance between the social and economic benefits and costs of gambling in this country