

## **INQUIRY INTO IMPACT OF GAMBLING**

**Organisation:** Casinos and Resorts Australasia

**Date received:** 7/04/2014

---

15 April 2014

Select Committee on Gambling  
Parliament House  
Macquarie Street  
Sydney NSW 2000

By Email to: [gamblinginquiry@parliament.nsw.gov.au](mailto:gamblinginquiry@parliament.nsw.gov.au)

**Re: Inquiry into Gambling**

Casinos and Resorts Australasia (CRA) appreciates the opportunity to provide a submission to the new parliamentary Select Committee on Gambling.

CRA represents Australia and New Zealand's 13 casinos at a government and community level. CRA actively works with our members to ensure consistently high standards are maintained across the industry particularly with regard to responsible gambling policies and practices.

**About CRA.**

Our sector incorporates modern casinos, which attract millions of visitors each year for their quality product offering including luxury hotels, world-class entertainment, and signature restaurants. They are a major employer providing over 25,000 jobs nationally, including best practice for responsible gambling initiatives.

CRA focuses on working with its members to devise and implement strategies to combat problem gambling. Our members promote responsible gambling practices that reflect the highest standards of probity and integrity. We have an active Responsible Gambling Sub-Committee to address and promote responsible gambling strategies. The Committee's membership consists of representatives of each casino who are responsible for the implementation of responsible gambling initiatives and managing the support given to patrons in their representative properties who may be experiencing difficulties associated with their gambling behavior.

Australian casinos operate in total compliance environments. They are also committed to good corporate social responsibility practices. Casinos and Resorts Australasia has produced this Submission to underline the contribution that Australian's casinos have made to sound responsible gambling practice in their properties. The subheadings below are set out in response to the select committee's terms of reference.

## **The design and accessibility of electronic gaming machines and new and emerging gambling products and services**

The base software and the game of a modern poker machine make up over one million lines of code, along with several million more for the operating system.

Every line of software, every component and every element of game mathematics and statistics must be comprehensively tested and quality assured by the supplier; submitted to the regulator for approval before the game or machine can be deployed to clubs, hotels or casinos. This applies equally to substantial changes to poker machine software, which results in major cost and effort for any significant reconfiguration in the field. The development and supply process takes at least a year, sometimes several years, for each game to be approved.

## **The regulation of the number and location of electronic and high intensity gaming machines**

Casinos have a large number of recreational and occasional players who play high bet limit and high denomination machines – and these players are not limited to international tourists. Research undertaken by CRA shows that casino poker machine players tend to have higher incomes and a high discretionary spend. When compared to other gaming venues across the country casinos typically have higher spend at restaurants, hotels, entertainment and gaming offerings.

NSW's poker machines are not characterized as "high intensity" gaming machines. NSW has some of the world's slowest gaming machines because the real spin cannot be interrupted – where re-hitting 'play' re-starts the reel spin in almost every other jurisdiction world-wide. Claims that the machines can also be played 1,200 times per hour, are also false, in reality it is much less than this.

## **Access to cash and credit in and around gambling venues, and the form and delivery of cash prizes**

All casinos have ATMs placed in secure and safe areas, outside the licensed gaming footprint, in their facilities. In all jurisdictions the location of ATMs has met the requirement of approval by the consent authority and/or casino regulator, which varies from state to state.

Responsible Gambling messages are displayed at ATMs (either as attachments to the machine or as part of the screen display) in many properties these messages are available in languages other than English.

CRA supports the responsible use of ATMs in casino properties. The casino industry remains dedicated to the responsible service of gambling products and understands that some patrons may experience difficulties related to their gambling behaviors.

The overwhelming majorities of casino patrons continue to utilize ATMs in a responsible manner and would be considerably inconvenienced should their access to these facilities face further restriction. No restrictions should be imposed on the broad cross-section of casino customers – both local and international – that may need to access banking facilities for all manner of reasons.

### **The role and capacity of gambling industry staff to address problems caused by gambling**

Responsible gambling training has grown with the understanding that gaming staff are at the front line of interaction with patrons and represent a key resource in creating responsible gambling environments.

Most States have adopted the responsible gambling principles set out nationally by the Ministerial Council on Gambling.

Training in responsible gambling generally seeks to equip staff with:

- a) Knowledge of the nature of mandatory regulatory environments and voluntary arrangements for the specific gambling providers in that particular state/territory – often with analysis of relevant codes of practice
- b) Knowledge of the nature of gambling and problem gambling – including behaviors identified by research that may indicate problem gambling; and
- c) How to respond to gamblers who may be experiencing difficulty. This training usually focuses on the sources of counseling and support that are available and how to institute an appropriate referral process – noting that elements may vary between providers

Since 1999 additional specialist responsible gambling staff have been employed in a number of Australian casinos to identify and deal specifically with any problem gambling issues that may arise.

### **The regulation of gambling advertising**

CRA members comply with relevant provisions of the GRA or Codes of Practice within their specific jurisdiction. Consideration is given to the potential impact that advertising and promotions may have on a person with a gambling problem, or a person at risk of developing a gambling problem.

In NSW there are legislative requirements not to publish or cause to be published any gaming machine advertisement outside the boundaries of the Casino other than to participants of the Loyalty Scheme who have elected to receive information or any other person who requests gaming machine advertising.

## **The adequacy and effectiveness of problem gambling help services and programs, including service standards, qualifications and funding of chaplaincy, counselling and treatment services**

CRA is committed to working with government and the community to promote responsible gambling. Australian casinos are unique in the way they operate and in the type of guests they welcome. Our members operate in a total compliance environment; they are subject to stringent regulatory controls within each State and Territory. Casino specific legislation and the corresponding regulatory regime, which recognizes that casinos operate in a materially different manner than other gaming services (i.e. telephone and internet gambling) is aimed at ensuring integrity in ownership, management and operations.

Casinos have invested in initiatives dedicated to promoting responsible gambling programs in each property. These include:

- Responsible Gaming Support Programs
- Referral to a range of support services
- Pre-commitment or limit setting programs
- Self-Exclusion Program which are generally legally binding
- Chaplaincy Support Service for those seeking Spiritual support
- Responsible Gambling Codes
- Language translation services
- All services are confidential and free of charge
- Responsible Gaming Liaison Officers (RLGOs) provide assistance, referral and information for customers, members of their families.

Australian casinos have forged strong partnerships with counselling services including; Lifeline, Amity, GABA, Hope Street, Relationships Australia, Centacare, Uniting Care, Anglicare, Salvation Army, Wesley gaming Counseling Services, BetCare, various other Gambling Help Services and gambling helpline providers. Casino patrons can be referred to these counselling services and where to get help information is promoted throughout the casinos.

Responsible gaming is the provision of safe, socially responsible and supportive gambling environments where the potential for harm associated with gambling is minimised and people can make informed decisions about their participation in gambling. It occurs as a result of collective actions and shared ownership of individuals, communities, the gambling industry and government.

A recreational gambler:

- Is in control
- Sees gambling as entertainment, not a job
- Doesn't take gambling too seriously
- Only gambles with the money set aside for entertainment, not for household essentials
- Never borrows money to gamble
- Sets limits on the amount of time and money they will spend
- Sticks to these limits and walks away when they are reached



- Doesn't chase losses
- Takes frequent breaks

### **The effectiveness of public health measures to reduce risk of gambling harm, including prevention and early intervention strategies**

CRA supports the view that better financial literacy and improved money management skills combined with gambling awareness will assist all adults, especially young adults, to make informed choices about the way they save money, budget and spend discretionary money. This could be through school based education programs and through nationally focused consumer education programs.

A national funded consumer education campaign should focus on ensuring more informed decision making with regard to gambling options such as providing information about how gambling products work, the cost of play and dispelling common myths about gambling.

### **The effectiveness of strategies and models for consumer protection and responses to problem gambling in other jurisdictions in Australia and overseas**

Australian casinos operate in total compliance environments. They are also committed to good corporate social responsibility practices. Across Australia, casinos have implemented over 200 responsible gambling initiatives since 1999. Some of these initiatives are responses to legislative or regulatory requirements and many are voluntary initiatives.

All 13 of Australia's casinos have self-exclusion programs, which allow patrons to exclude, or ban themselves from entering the gaming floor. In many jurisdictions including NSW, casinos will initiate a casino exclusion for problem gambling reasons.

### **Conclusion**

The vast majority of Australians gamble responsibly. Gambling is an entertainment industry that employs over 150,000 people across Australia. It is also a key offering within our broader hospitality, tourism and accommodation sectors.

The casino industry is very serious about responsible gaming and corporate social responsibility. It has been at the forefront of designing and implementing practical methods to reduce the harm associated with problem gambling behaviour. The casinos also take this role very seriously and use evidence based research to improve and enhance responsible gambling initiatives at its venues.

John Lee  
Chief Executive Officer