



BETSAFE SUBMISSION TO PRODUCTIVITY COMMISSION

Executive Summary

BetSafe Pty Ltd provides an independent, comprehensive and integrated responsible gambling program for a group of leading NSW and ACT gaming machine venues and seeks to provide the highest standards in staff training, problem gambling counselling, self-exclusion and all other aspects of its program.

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1. The BetSafe Program

The BetSafe program, established in July 1998 by Paul Symond, an expert gambling counsellor, introduced many new harm minimisation measures, a number of which have since been adopted by government and other sections of the gaming industry. The program commenced with 11 major clubs as members and currently has a membership of 42 registered clubs in NSW and the ACT. These clubs are listed in Appendix A.

BetSafe is solely funded by its gaming industry members, which are predominantly larger NSW registered clubs. BetSafe member clubs demonstrate a genuine concern for the wellbeing of their patrons by implementing the best possible responsible gambling program.

The focus of BetSafe is to provide the highest quality of harm minimisation program in an integrated manner. The key elements of BetSafe are problem gambling counselling, staff training, consumer information and self-exclusion. BetSafe strives to provide the world's best practice in its responsible gambling program which integrates these key elements and a range of subsidiary elements to produce a highly effective outcome.

The integrated approach of the BetSafe program requires all gaming venue staff to be trained in the responsible service of gambling. The interaction of staff with patrons is the most important factor in minimising the potential negative impacts of gambling.

The BetSafe program includes a free 24 hour problem gambling counselling service for members, guests, staff and their immediate families of BetSafe member venues.

An individual's gambling problem may develop over a short or long period of time before they are willing to admit they have a problem and seek help. The moment at which a person realises that they are a problem gambler is the moment at which help should be available. These problem gamblers may reach a crisis point where urgent intervention is necessary at any time of day or night. It is not uncommon for problem gamblers in crisis to seriously consider self-harm. BetSafe provides a crisis intervention service, available 24 hours 365 days per year, for patrons who may threaten to self-harm. In the event of a crisis call, BetSafe have trained staff who will provide immediate assistance to the patron over the phone, or attend the club immediately where required.

The BetSafe program also provides:

- Resources promoting responsible conduct of gambling and advice on their suitable placement
- Publications in a number of different languages
- Access to interpreter services for both telephone and face-to-face counselling
- A comprehensive up-to-date policies and procedures manual
- A "third party" complaints policy & procedure for "third party" exclusion
- Information about developments in responsible gambling policy and procedure
- Legal information and advice
- Anti-Money Laundering and Counter-Terrorism Financing legal compliance systems.
- 24 hour support for staff of BetSafe member clubs in dealing with crisis situations, processing self-exclusions and managing problem gambling incidents.

BetSafe assists each member club to develop and implement their responsible conduct of gambling policies and procedures which are set out in a Policies and Procedures Manual. These policies and procedures cover:

- Unattended children
- Underage gambling
- Financial transactions
- Legal and compliance information
- Complimentary food and drinks
- Payment of jackpots and winnings
- Helping problem gamblers
- Dealing with third party complaints
- Exclusion procedures
- Responsible advertising and promotional material
- Gaming areas
- Staff gambling issues
- Training policy
- Customer complaints
- Confidentiality and Privacy

BetSafe has developed procedures to ensure the effectiveness of its self-exclusion program. Detailed staff training ensures that staff know when and how to talk to patrons about self-exclusion and how to process a request for self-exclusion. Simple but effective self-exclusion forms, flow charts and procedures ensure that self-exclusion works well, for the benefit of the gaming venue and patrons.

For those patrons who are known to have a gambling problem that is causing them harm but who refuse to self-exclude, BetSafe has implemented an involuntary exclusion process. BetSafe also has procedures to assess the suitability of requests made by patrons who wish to

end their period of self-exclusion and re-enter the gaming venue, and for responding to complaints or exclusion requests made by relatives and other third parties.

Case Study #1

Mrs D was a 49 y.o. woman who developed a serious gambling problem that caused turmoil with her family and ruined her finances. She threatened to commit suicide. Her husband and son applied to the club to ban Mrs D after an incident where the husband grabbed his wife and tried to drag her from the club. BetSafe staff interviewed the father and son and prepared statutory declarations as a step towards involuntary exclusion of Mrs D. A decision of the Board was made to exclude Mrs D.

Some months later, Mrs D contacted BetSafe and saw one of our counsellors. She then voluntarily signed a self-exclusion deed and was counselled on 24 occasions. Enquiries were made regarding her suitability for a long-term residential gambling treatment program. Mrs D is no longer gambling and now reconciled with her family.

BetSafe also provides consultancy services on responsible gambling issues to gaming industry providers including casinos, gaming machine manufacturers, internet gaming industry, governments, poker leagues, industry associations and international gaming providers. BetSafe was instrumental in establishing the Global Gaming Guidance Group (G4), an independent responsible gambling accreditation agency [1].

Duty of care issues and the risk of litigation ensure that responsible gambling issues are a priority for the gaming industry. BetSafe's proactive approach to responsible gambling has enabled its member clubs to minimise gambling-related complaints and the risks associated with patron liability. BetSafe's knowledge is based on its many years of experience working with both the gaming industry and consumers. BetSafe has expertise in all areas related to responsible gambling programs, including counselling, staff training, compliance auditing and legal knowledge.

BetSafe provides quarterly responsible gambling audits of its member clubs, involving actual visits by a senior BetSafe staff member to the gaming venue to check on compliance with the BetSafe program and advice to management on how to make their responsible gambling program most effective.

1.1 Synaval evaluation of BetSafe program

The BetSafe program was independently evaluated by the Synaval organisation in 2000/2001. In particular, Synaval assessed the effectiveness of the following elements of the BetSafe program:

- The uses of information, publications, signage and procedures
- BetSafe staff training
- BetSafe counselling
- BetSafe self-exclusion program.

Synaval's evaluation demonstrated that the BetSafe program was highly effective. A copy of the Synaval assessment can be provided on request.

2. Gambling in Australia

Over the past decade there has been a maturing of the Australian gambling industry, evidenced by a consolidation of ownership, declining profit margins and a focus on sustainability. There has also been a consistently high level of probity in the Australian gambling industry with a high level of government regulation and policing. Criminal

involvement in the Australian gambling industry is negligible. Revenue collection is effective and organizations such as registered clubs make significant voluntary contributions to the community in addition to the tax they pay.

Only a minority of gamblers are at risk of developing a gambling problem. The challenge for the future is to continue to develop the gambling industry, improving the recreational aspects, while cutting the incidence of problem gambling. This will be achieved by focusing on the detail of responsible gambling and effective harm minimisation strategies.

Governments remain responsible for providing a stable and fair environment for the gambling industries to operate, rather than making short-term policies to deal with momentary issues. Government policy should focus on meeting the recreational aspirations of gambling consumers and ensuring the long-term financial viability of gambling providers. Indeed, governments need to be proactive in supporting and encouraging gambling industry development where that development is based upon evidence-based responsible gambling strategies.

In addition to government activity, a number of gaming industry initiatives have also responded to the issue of problem gambling. The BetSafe program was one of the first of these initiatives and remains the industry leader. BetSafe clubs have made significant progress in developing and improving their responsible gambling programs and continue to be committed to minimise the impact of problem gambling on their patrons. In order to encourage further industry initiatives, governments should consider providing a range of incentives to those sectors of the gambling industry that are proactive.

It is important to recognise that the majority of people who gamble, do so without developing problems. The NSW Independent Pricing and Regulatory Tribunal [2] (IPART) described recreational gambling as follows:

“Many people in NSW regard gambling as an enjoyable activity. For example, they may see it as:

- *A way to pass the time in a pleasant social environment*
- *A form of entertainment or an escape from reality*
- *A means of achieving excitement, a thrill or an adrenalin rush*
- *A hobby or way to relax*
- *A chance of achieving the dream of financial security, or*
- *A medium to help them meet other people.”*

It is desirable that the gaming industry be encouraged to develop products and markets to provide gambling as entertainment. This may mean allowing gaming machine venues to have more machines than they currently are allowed, subject to those machines being assessed as offering a higher entertainment rating.

It is important that recreational gamblers have access to forms of gambling that are carefully designed to maximize the recreational utility and minimise problems. Consumer information, appropriate warnings, restrictions on access to funds and well-trained staff are all factors in reducing the development of gambling problems.

3. Gaming Machines

NSW has followed other jurisdictions and imposed a State-wide cap on gaming machine numbers. BetSafe does not support this cap as there is no evidence that it would be effective in reducing problem gambling. One of the problems with the cap on gaming machine numbers is that there are less machines available at peak times (e.g. Saturday night) when recreational gamblers are most likely to be wanting to gamble. At those busy times, it is the problem gamblers who are most likely to be occupying the gaming machines. These problem

gamblers are less likely to take a break if they feel that they will lose a spot on the gaming machines.

There is a much greater awareness of problem gambling amongst gaming machine players and the community generally, than there was a decade ago. The fact that the community now recognises the risks of excessive gaming machine usage is a step towards addressing problem gambling. It is unlikely that a “cure” for problem gambling will ever arise. In our opinion the prohibition or excessive restriction of one form of gambling will simply result in the movement to another form of gambling. Rather we support the provision of a more effective responsible gambling regime, including both preventative and rehabilitative measures.

Governments need to consider the effectiveness of the mandatory elements of responsible gambling regulation. For example, in NSW gaming machine venue staff are required to attend a 6 hour responsible conduct of gambling course. The current course is out of date and provides little guidance for gaming venue staff on how to provide assistance to problem gamblers who may seek help. The content of the mandatory course is poorly conceived and of limited effect, focusing on legal compliance issues with little content in how best to help the gambling consumer and those seeking help. This is recognised by industry, government and the gaming staff who undertake the course, but to date there has not been an improved version. Gaming staff who work for BetSafe clubs undertake the mandatory course and in addition undertake BetSafe’s shorter but more effective training courses, which are relevant to the key issue of providing help for problem gamblers.

Gaming venues have improved their standards of service and product considerably over the past decade. Competition between gaming venues has intensified and this is reflected in the substantial expense that has gone into building construction and renovation. Gaming machine technology has also improved and gaming machines are now more attractive and easy to play than a decade ago. Many gaming venues have invested heavily in co-locating other activities with gaming, so that patron attendance at clubs, hotels and casinos has risen considerably.

There is now widespread public and gaming industry recognition that problem gambling is a real and undesirable social harm. Over the past decade there have been many proposals and initiatives to address problem gambling suggested or implemented in Australia and overseas. There has been a much greater involvement of State and Territory governments in regulating, reviewing and researching problem gambling issues. There is more research evidence about those responsible gambling strategies that are effective, and those that are not. The challenge now seems to be to assess the effectiveness of the different strategies and how to plan for further improvements in responsible gambling and harm minimisation strategies.

4. Staff training

Gaming venue staff have a critical role to play in responsible gambling strategies, because they have the most contact with consumers who gamble. BetSafe has always strongly emphasised the importance of staff training, from senior management to ordinary staff who have contact with patrons outside gaming activities.

The commitment of staff is vital to an effective responsible gambling program. It is possible to achieve legal compliance with the responsible gambling laws without doing much to actually help patrons on a personal level. Gaming venues which have a genuine commitment to responsible gambling are more effective. This begins with a commitment to responsible gambling at a Board and senior management level. When the organisational leaders demonstrate a genuine commitment to responsible gambling, the ethos trickles down to all levels of the organization.

There are obvious indicators that a gaming venue is seriously committed to responsible gambling. Signs and brochures are prominently displayed. Promotions emphasise the

importance of gambling responsibly. Staff are positive about their work. Gaming area staff in particular are not afraid of how to respond to problem gamblers. Patrons who seek help for gambling problems are given prompt assistance and encouraged to self-exclude and seek counselling.

The BetSafe program constitutes a group of gambling providers who are highly motivated to provide the highest level of harm minimisation. This corporate culture begins at the Board and executive levels and filters down through management to frontline staff.

BetSafe gaming venue staff are not immune from gambling problems. BetSafe conducted a staff gambling survey in conjunction with its 2008 training program and surveyed 1075 staff. The questions and answers are provided in Appendix E.

Research by Professor Nerilee Hing and Helen Breen of Southern Cross University [3] identified a high prevalence of gambling problems among gaming venue staff. Their research also highlighted the importance of effective staff training in helping gaming staff avoid developing gambling problems. In addition, Hing and Breen emphasised the importance of providing appropriate assistance to staff with gambling problems. The researchers noted that most current gaming staff training programs are perceived as inadequate and listed the following suggestions for improvement:

- to train all staff,
- to conduct regular refresher courses,
- to better emphasise the odds in gambling, the negative effects of problem gambling, and risks for staff in their own gambling,
- to have a dedicated staff member to ensure training was regular and of high quality.
- more training, especially for newer and younger employees, might dispel erroneous beliefs and decrease the normalisation of gambling and heavy gambling.

BetSafe training covers all of these issues. BetSafe training has an impact in reducing the level of gambling problems among gaming venue employees. An independent evaluation of the BetSafe program by Synaval found that BetSafe trained staff were more confident, positive and helpful and made fewer mistakes.

Case Study #2

Ms E was a 40 y.o. divorced woman who worked in a club. She would often play the gaming machines after work. One day she asked her supervisor for an advance on her pay as she had lost all her money gambling. Her supervisor recommended that Ms E call BetSafe to discuss her gambling problem. She received counselling on the telephone and face-to-face and with the counsellor, Ms E put together a plan to stop gambling. Ms E no longer gambles and has developed new interests outside of work.

There is an impact on patrons by staff who are more aware of gambling problems and more effective in providing assistance to problem gamblers. Because of the relationship initiated during training sessions, club staff with gambling problems are more willing to seek counselling from BetSafe.

Gaming staff are the primary point of contact for most problem gamblers who are seeking assistance. Problem gamblers spend a lot of time gambling and may get to know staff quite well. They see staff as being non-judgmental and worthy of trust. There is frequent interaction between gamblers and staff. At the point when gamblers realise they have a problem and decide to take steps to address that problem, they usually disclose the gambling problem and seek help from a staff member where they gamble. That staff member may be a gaming staff member, barperson, or security staff.

BetSafe provides a full range of staff training, which is in addition to the mandatory NSW and ACT Responsible Conduct of Gambling, and ACT Gambling Contact Officer courses. A listing of the training courses provided as part of the BetSafe program are listed in Appendix B.

The BetSafe gambling awareness course for all club staff provides a general understanding of problem gambling and appropriate responses to patrons seeking help. It means that a problem gambler can disclose a gambling problem to a restaurant employee, barperson, doorman or security staff in a BetSafe club and be sure of an appropriate response. Gaming staff training provides comprehensive training for gaming staff in responding to problem gamblers and other harm minimisation issues. Duty managers training provides a higher level of training covering the processing of self-exclusion and other gaming related issues. Other specialist courses cover staff in management, marketing and sports people.

Comprehensive staff training is essential to ensure that the integrated approach of the BetSafe program is effective. The interaction of staff with patrons is the most important factor in minimising the potential negative impacts of gambling. Staff are much more effective in helping problem gamblers after receiving BetSafe training. Staff understand their rights and responsibilities better which results in fewer staff problems and patrons who are served better. A summary of staff training evaluations for the 2008 calendar year is provided in Appendix D.

When patron problems arise, staff are more confident, positive and helpful and make fewer mistakes. Because of the relationship initiated during training sessions, club staff often discuss what to do in a particular circumstance with BetSafe staff, before taking action.

Training sessions provide an excellent opportunity for staff to disclose information about responsible gambling issues or problems, which they might normally be reluctant to raise with superior. BetSafe can then provide advice directly to the staff concerned, or raise the issues with management in a way that preserves the privacy of the staff member concerned.

Case Study #3

Following a BetSafe training session for staff of a gaming venue, a staff member approached the trainer and disclosed that he had a serious gambling problem. Although he was not allowed to gamble where he worked, he would go to other gambling venues after his shift finished. BetSafe provided gambling counselling for the staff member which helped him to change his understanding of gambling and arranged for him to self-exclude from the other venues. The staff member reports that he has now stopped gambling and is feeling much better.

5. Problem Gambling

Over the past decade there has been a considerable increase in government and gaming industry responses to problem gambling. There is a widespread acceptance of the existence of problem gambling and the need for appropriate responses. There are controls on access to gambling funds, limits on prizes, restrictions on advertising, warnings and information campaigns, staff training, self-exclusion, counselling, community education and more.

Responsible gambling measures need to be constantly evaluated for effectiveness and improved. For example information about the nature and risks of problem gambling needs to be targeted to different consumer groups. Recreational gamblers take little notice of messages that provide information about help services for problem gamblers. Problem gamblers take no notice of information about gambling products provided to recreational gamblers. The next

stage in responsible gambling strategy requires a more detailed analysis of which elements are most effective for different consumer groups.

In particular different subgroups of problem gamblers have different profiles, causes and needs. Age is one differentiating factor requiring specialist responses such as the NSW Government's Gambling Hangover campaign targeting young problem gamblers. BetSafe's training covers some of the different groups that are affected by problem gambling, which enables gaming staff to respond more effectively to requests for help.

6. Problem Gambling counselling

Problem gambling counselling is considered to be the most effective form of treatment for problem gambling. BetSafe counselling staff have extensive experience in providing specialist gambling counselling and have a high level of success in this area. BetSafe provides both telephone and face-to-face gambling counselling for patrons of BetSafe clubs with the following features:

- Skilled and experienced gambling counsellors
- Integrated telephone and face-to-face counselling
- Continuity of counsellor contact
- 24/7 service
- Expertise in managing crisis situations and suicide prevention
- Close working relationship with BetSafe gaming venues important to facilitate referral and recommendation
- Self-exclusions processed immediately at the gaming venue
- Counselling for patrons seeking to end their period of exclusion
- Ongoing gambling counselling for as long as is required. BetSafe has no limit on the number of gambling counselling sessions, unlike a number of government funded services that only provided a fixed number of counselling sessions.

BetSafe gaming venues promote BetSafe counselling as part of the BetSafe program of responsible gambling. In many cases gaming venue staff will assist a problem gambler to call BetSafe at the time they request assistance or apply for self-exclusion.

Telephone counselling is provided 24 hours a day, 7 days a week by BetSafe's specialist gambling addiction counsellors.

Crisis intervention is an important aspect of telephone counselling. All BetSafe telephone counsellors are skilled in providing appropriate responses to callers who may be proposing self-harm. There is a range of appropriate responses including arranging immediate face-to-face counselling or facilitating the attendance of a mental health crisis team. Time is of the essence when a crisis occurs and the BetSafe program seeks to have the person in crisis speaking to a counsellor within 45 minutes of first contact with gaming venue staff. Counsellors seek to integrate different aspects of assistance, such as face-to-face counselling and self-exclusion in the crisis intervention.

Face to face counselling is provided for problem gamblers where needed upon referral from the telephone counselling service. Face to face counselling is available in the evenings and on weekends as well as during business hours. This is a significant difference between BetSafe and other gambling counselling services, such as those operated by industry associations and charitable bodies. Problem gamblers do not just need help during the hours of 9 am to 5 pm, Monday to Friday.

A rigid program of counselling that offers only a standardised program with a fixed number of counselling sessions lacks the flexibility to assist the wide range of people with gambling problems. The needs of individuals who seek counselling vary tremendously. In some cases a person may only attend a single counselling session to receive some benefit. In other cases, a

series of intensive counselling may need to be followed by periodic maintenance counselling over a period of months. Some individuals value a long-term counselling relationship where they know they can call their counsellor at any time if they are suddenly struck with a strong urge to gamble. Some BetSafe counselling clients have maintained their abstinence from gambling by being able to call at such times, even over a period of years.

Case Study #4

Client A undertook a series of counselling sessions with BetSafe, initially weekly, then fortnightly. After 3 months, client A and her counsellor agreed that she was now managing her life well without gambling. However, the following month, a crisis in client A's life caused her to 'bust' and she lost her week's pay gambling. She knew that she could return to counselling without criticism and it took a further series of counselling sessions before client A was able to quit gambling for good.

BetSafe problem gambling counsellors utilize a range of counselling methods to provide flexibility and respond to client needs. Just as problem gambling has a variety of causes and issues, so too effective counselling needs to be provided in the form that is considered most effective in responding to those causes and issues.

BetSafe counsellors know and understand the particular culture and circumstance of each member club. Many of the calls to BetSafe are initiated by club patrons at the suggestion of staff who are trained and motivated to recommend BetSafe.

BetSafe also provides counselling to gaming venue staff who are personally experiencing problems with gambling. There is a higher incidence of problem gambling among staff who work in a gaming environment when compared to the incidence in the general population. The extent to which the gambling environment contributes to staff developing problem, rather than persons with a potential problem being attracted to the work is not known. However, unless addressed, problem gambling can cause serious difficulties for staff.

BetSafe recommends that gaming venues impose a complete ban on their own staff gambling at the venue to minimise the incidence of staff developing gambling problems. This is an occupational health and safety issue that is only now being recognised by the wider gaming industry. Strangely, the hospitality industry unions have been opposed to the ban on staff gambling, rather than supporting it. Hopefully the results of research showing the high level of problem gambling among venue staff will win over the hospitality industry unions.

7. Exclusion

BetSafe provides a comprehensive and effective exclusion program that exceeds comparable programs in many respects. Statistics relating to incidents in BetSafe clubs are provided in Appendix C and illustrate BetSafe and its member club's vigorous approach to exclusions.

7.1 Self-exclusion

Self-exclusion is a highly effective form of assistance for problem gamblers. It should be noted that there is a considerable range of quality in various self-exclusion schemes. It's not only that the content of self exclusion schemes varies, but the way each is administered. In particular, the effectiveness of a self-exclusion scheme can be greatly improved by strong promotion, motivated staff and proper intervention training.

The BetSafe self-exclusion program provides an effective break from gambling for problem gamblers who are beginning to address their problem. It is our experience that problem gamblers are most willing to self-exclude at the point of crisis, typically after a heavy

gambling loss. Unless the problem gambler is able to immediately sign a self-exclusion deed, the desire to self-exclude fades and may be overtaken by a desire to return and gamble to recover past losses. The sooner the problem gambler commits to self-exclusion, the sooner the gambler's recovery can begin.

BetSafe's standard period of self-exclusion ranges from a minimum of 6 months up to 12 months. We do not believe that any period of time less than 6 months provides an adequate opportunity for a problem gambler to achieve control over their gambling problem. On the other hand, we consider that a person who wants to self-exclude "for life" may find that after a few years they have overcome their gambling problem and regret such a lengthy commitment. So the range from 6 to 12 months is appropriate for most participants in the self-exclusion program. However, as explained under the heading "Re-entry following self-exclusion", no matter what the period of self-exclusion, a person must demonstrate that they have addressed the issues relating to their gambling problem by attending either an assessment or on-going counselling with an accredited problem gambling counsellor (generally by a BetSafe counsellor) prior to being readmitted to a club from which they self-excluded.

So in a typical scenario, a patron who has been developing a gambling problem has a crisis after losing heavily and speaks to a staff member, disclosing the gambling problem. The staff member refers the patron to the duty manager, who explains the self-exclusion program. The patron decides to self-exclude, signs the deed on the spot, and has their photo taken by the club. The patron is also referred to counselling. The patron can go home confident that they are safe from returning to gamble again the next day.

7.2 Multiple venue self-exclusion

Sometimes an individual who has self-excluded from one venue will commence gambling at a different gaming venue, particularly in the same region. This is not helpful either to the individual or the gaming venue. BetSafe will facilitate self-exclusion from multiple venues at the one time. BetSafe will organise the paperwork and take the photo of the person in a single interview. Instead of having to go from one place to another to sign deed after deed, with a fistful of passport sized photos, the patron can nominate a number of venues where he/she gambles, and BetSafe will forward the request, a copy of the deed and a photo of the patron to the nominated gaming venues.

In NSW, there are a large number of gaming venues and it is an unreasonable burden for a problem gambler to make an individual application to every club in their local area for self-exclusion, plus an excursion to the AHA to be interviewed for hotel exclusion and another interview again at the casino. BetSafe has found that up to 10 gaming venues can easily be processed using current technology in a single multi-venue application. There are administrative obstacles to processing very large numbers of self-exclusions without widespread use of advanced technology and practical obstacles in enforcement.

The self-exclusion process is much simpler if a person can simply attend a single interview and self-exclude from all venues in the area. BetSafe uses a secure web-based self-exclusion database, which is both efficient and protects the privacy of the individual.

7.3 Involuntary exclusion

In some cases, a patron will disclose a serious gambling problem to staff, but refuse to sign a self-exclusion deed. In those cases the club will consider whether actual knowledge of a person's serious problem warrants the imposition of a period of involuntary exclusion. Independent advice is provided by the BetSafe consultancy in each case as to whether involuntary exclusion is justified. BetSafe takes the view that the club owes a duty of care to its' patrons to protect them from further harm when the patrons have clearly disclosed their

gambling problem. This is initiated by the patron and is often brought about by a desire for help.

Case Study #5

J approached the duty manager in a BetSafe club late in the evening and asked to borrow money to catch a taxi home as he had lost all his money gambling on the machines and there was no money in his bank account. The duty manager arranged for a taxi to take J home, paying the taxi by voucher to prevent J gambling the cash. The club involuntarily excluded J to prevent him from further problems.

In some jurisdictions such as NSW, there is no legal obligation upon gaming venues to exclude a disclosed problem gambler, so other clubs, hotels and the casino continue to allow known problem gamblers to cause harm to themselves. Only BetSafe clubs take the initiative in this regard. BetSafe's approach is consistent with community's concept of 'duty of care'.

Although involuntary exclusion is not required by law in NSW, it is required in the Australian Capital Territory, where clause 14 of the Gambling Code of Practice states that:

"The Club must exclude a person from gambling at the Club if the Club has reasonable grounds for believing that the welfare of the person, or any of the person's dependants, is seriously at risk because of the person's gambling problem."

The ACT approach is somewhat more complicated than BetSafe's NSW approach but still has the same objective, which is to involuntarily exclude known problem gamblers who are at serious risk of harm.

The issue of involuntary exclusion of problem gamblers has been unnecessarily complicated by the long-running debate over whether there is an effective means of identifying problem gamblers. We refer you to a helpful survey of experts conducted by the Australian Gaming Council [4]. The experts unanimously agreed that there is no clear and simple method of identifying problem gamblers by their behaviour such as expenditure levels or time at venue. However, we have taken the view that a clear statement by a person to the effect that they have a gambling problem can be relied upon.

Research by Delfabbro for Gambling Research Australia noted that gaming venue staff were generally confident in identifying problem gamblers, but didn't know what to do with that information, saying:

"The most significant barrier to identifying problem gamblers was not staff turnover, the length of shifts, or even the size of venues, but the lack of staff training relating to direct interventions with gamblers on the gaming floor. Most staff did not feel confident about how patrons would respond if they were approached. For this reason, there was strong support for the introduction of further training to assist this process." [5]

BetSafe gaming venue staff receive appropriate training in responding to problem gamblers which enables them to identify problem gamblers from their disclosures and know how to respond appropriately. BetSafe will also provide advice to staff and management on the appropriate response to a problem gambler who declines self-exclusion, and whether involuntary exclusion is appropriate.

Case Study #6

T approached a staff member and told the staff member that she had lost all her money gambling and asked for a loan. T called the duty manager who interviewed T and explained self-exclusion and referred T to BetSafe for counselling. Although the incident occurred during the evening on the weekend, the staff member was able to call BetSafe and arrange for T to see a counsellor the following week. T agreed to sign a self-exclusion deed on the spot.

7.4 Third party exclusion

Sometimes family members or friends approach gaming venue staff seeking assistance in the imposition of exclusion upon an alleged problem gambler. In these cases, the gaming venue will refer the family members to BetSafe counsellors who investigate the allegations and consider whether the person's gambling is causing serious harm. The person is consulted and a decision may be made to impose an involuntary exclusion where the welfare of the person or a family member is seriously at risk. These third party exclusions are not required by law in most States such as NSW but are required by the ACT Responsible Gambling Code of Practice.

The investigation of a request for third party exclusion requires the family members to provide evidence demonstrating the actual or potential harm being caused by the alleged problem gambler. The sort of harm that may warrant third party exclusion is:

- Stealing money from family or others to gamble
- Borrowing money from family to gamble and not repaying it
- Seeking family help to pay for living essentials such as rent or food
- Children left alone while person gambles
- Family support children or gambler's partner due to financial neglect by person

BetSafe will ask the family members to provide a statutory declaration. BetSafe will then endeavour to contact the person concerned and give them the opportunity to respond to the allegations. A decision to impose third party exclusion is not made lightly. Many people who make an initial inquiry about third party exclusion decline to follow through, either because they cannot demonstrate the level of potential harm, or because they choose an alternative (such as separating from the problem gambler).

Gaming venues should exercise a duty of care to those patrons they know have a gambling problem. As well as promoting self-exclusion and counselling, gaming venues will also have situations where they should intervene to assist a known problem gambler. BetSafe has successfully provided an involuntary exclusion and third party exclusion program for a decade. Involuntary exclusion applies to patrons who are believed to have a gambling problem but are failing to take action to prevent themselves suffering harm. In such a circumstance it is unconscionable for a gaming venue to simply stand back and watch as people harm themselves. Involuntary exclusion should only apply when there is little doubt that a person has a gambling problem. Typically a problem gambler will tell gaming staff that they have a gambling problem or disclose the harm that their gambling has caused them. While some problem gamblers object strongly to being excluded, others appreciate the concern that a gaming venue exercises to help them, when they may not be strong enough to help themselves.

Third party exclusion is simply a variety of involuntary exclusion, where the request for exclusion originates with another person. Sometimes a family member or friend of a problem gambler will try to stop the person gambling either verbally or physically in the venue. These family members or friends are referred to BetSafe to make a formal application for third party exclusion. In considering requests for third party exclusion, great care must be exercised by

the gaming venue to protect the rights of the individual. While a complaint made by a family member or friend may be well-intentioned, in many cases it is not appropriate to simply accept the request. The third party may be motivated to complain about a person's gambling as a means to embarrass the person, or to protect their expectation of inheritance, or because they consider gambling to be a waste of money. If gambling is not causing someone harm, then there is no reason to impose a third party exclusion. Third party exclusions are rare. In order for a third party complaint to proceed to a third party exclusion, the complainant must establish the following elements:

- Proof of identity of the complainant and their relationship with the subject of the complaint
- Provision of evidence supporting the complaint, including a face-to-face interview with the complainant;
- Confirmation of the complaint, by way of statutory declaration;
- An opportunity for the subject of the complaint to respond to the allegations before any decision is made.

Many who people inquire about 3rd party exclusion do not proceed to have their family member excluded. Details are provided in Appendix C. Reasons why complaints did not result in self-exclusion varied. Some of the complainants were unwilling to have their identity disclosed to the subject of the complaint, others failed to provide objective evidence to substantiate their request for exclusion. In a couple of instances the third party complainants turned out to be using an alias, and were seeking to have a person banned from the gaming venue for malicious reasons.

Case Study #7

R had a serious gambling problem which caused him to take significant amounts of money from his family to gamble. When he begged his family to pay a debt he owed to a loan shark, the family agreed to pay the loan shark but then asked BetSafe to assist. A number of BetSafe clubs imposed involuntary exclusion upon R who went to great lengths to evade detection, even changing his name. Eventually R was charged with a criminal offence. He realised that he had reached 'rock bottom'. R contacted BetSafe who provided him with counselling and assisted him to overcome his gambling problem. R has succeeded in starting a new life without gambling and acknowledges that the third party exclusion assisted him in reaching the point where he was willing to seek help for his gambling problem.

7.5 Re-entry after self-exclusion

Re-entry to the gaming venue following expiry of a period of self-exclusion is not automatic. The standard period of exclusion may not be long enough. BetSafe provides a re-entry procedure to ensure that problem gamblers who want to return to gamble seriously consider what they are doing before returning to a gambling environment. Statistics are provided in Appendix C. BetSafe gaming venues require problem gamblers seeking to lift their exclusion to undertake a counselling assessment and provide evidence to show that they have taken steps to manage their gambling problem before they are readmitted. The evidence required may include a letter of support from a spouse or other family member.

This re-entry procedure provides a barrier to a relapse into gambling problems for patrons who may not have adequately dealt with their issues during the exclusion period. It also provides an opportunity to discuss the possibility of a relapse. Some problem gamblers abandon their efforts to re-enter the club when informed about the re-entry requirements. Of those who proceed with their application, about 90% are eventually permitted to return to the gaming venue and very few of these report subsequent problems.

BetSafe's strict re-admission procedure is limited by the fact that a problem gambler can simply go to another gaming venue which does not have the same standards as BetSafe.

Case Study #8

L had self-excluded from her local club a couple of years before and had not gambled since. However, she wanted to visit the club restaurant and shows with a group of friends. The club asked BetSafe to conduct an assessment of L to see if she had overcome her gambling problem. BetSafe interviewed L regarding her motivation to return to the club and her current attitudes to gambling. L provided a letter from her husband stating that he considered that she had overcome her gambling problem and supported her application to rejoin the club. BetSafe recommended that the exclusion be lifted and L is now able to attend the club with her friends and enjoy herself without gambling.

Case Study #9

N had originally seen a BetSafe counsellor in 2005 when he discussed gambling strategies and decided he wanted to try controlled gambling. He later agreed to self-exclude saying controlled gambling was 'dismal failure'. In 2008 he contacted BetSafe after he unsuccessfully tried to enter a BetSafe club where he remained excluded. He agreed that he remained addicted to gambling and wanted to return to the club and continue gambling. The counsellor did not support his request to end the self-exclusion and the club board decided not to readmit him. After further discussions with BetSafe he terminated counselling, saying that he would go to the casino and gamble there.

7.6 Breaches of exclusion

There is a need for an effective deterrent to enforce exclusions. It is not uncommon for an excluded person to make numerous attempts to re-enter the premises and gamble. This may be because the person wishes to "test the system" but is more likely because the person is struggling with a strong urge to gamble. These repeated breaches of self-exclusion can be harmful for the gambler and also problematic for the gambling venue. Venue staff may have to repeatedly remove problem gamblers who repeatedly breach their exclusion orders.

Case Study #10

M changed his name and used disguise to enter a number of clubs from which he was banned to gamble on their multi-terminal gaming machines. He later wrote to the clubs, pointing out that he had breached his exclusion and threatened to sue the clubs for failing to keep him out.

NSW clubs and hotels have no sanction provided by law against problem gamblers who try to re-enter the gambling venue in breach of their exclusion. In the case of Star City casino, patrons who repeatedly breach their self-exclusion can be the subject of an involuntary exclusion order under s.84 *Casino Control Act (NSW)*, which results in a fine if they then breach their exclusion.

In the Federal Court case of *Foroughi v Star City* [6], a gambler sued the casino for failing to keep him out on multiple occasions after he had self-excluded. The gambler was eventually unsuccessful, but the case highlights the need for an effective sanction to deter problem gamblers from breaching exclusions.

BetSafe has developed a policy of asking problem gamblers to agree to a sanction at the time they sign their self-exclusion deed. The sanction is that if they breach their self-exclusion they will forfeit any prize they may win. At the time of winning a prize a person must provide identification and is more likely to be identified, particularly if they entered the venue using a disguise.

In practice, it has not been necessary to carry out the forfeiture, because the thought that a prize might be forfeited is enough to discourage most self-excluded patrons from trying to re-enter BetSafe venues. Typically, a patron who wins a prize is asked to attend a meeting with BetSafe where they are reminded of the forfeiture policy and told that on the first occasion they receive a warning and subsequently the prize is forfeited. In this way patrons are made very aware of the deterrent. We consider that the possibility of prize forfeiture is a much more effective deterrent than a fine would be. To avoid suggestions that gaming venues would benefit from the forfeiture, we recommend that clubs give these forfeited prizes to charity.

8. Responsible Gambling Measures

Signage is an effective way of conveying information to patrons. However, to be effective, signage must provide information that people want in a form and location that is clear, simple and attractive. We consider that much mandatory gaming venue signage has limited effectiveness due to the prescribed content and location not being appropriate to patron's needs.

Many gaming venues now have electronic signs, scrolling screens, message boards and other mediums that display a variety of advertising messages. We have found that these are effective mediums for promoting the various aspects of BetSafe's program such as counselling and self-exclusion because they are attention-grabbing and dynamic.

BetSafe's distinctive stop sign notices have been effective in gaining the attention of gaming machine staff and patrons. Synaval's independent evaluation of BetSafe found that 98% of staff and 64% of members had seen the BetSafe problem gambling warning notice. Of those people who had seen the notice, 43% rated the notice as effective in encouraging people to gamble responsibly while 42% rated the sign as not effective. Staff were more likely to rate the notice as effective (48%) than members (33%).

Synaval's independent evaluation found that 92% of staff and 58% of members had seen the BetSafe counselling services sign. Of those who had seen the sign, 47% rated it as effective, and 53% rated it as not effective. Staff were more likely to rate the sign as effective (47%) than members (34%).

We have found that a creative approach to signage which emphasises patron responsible behaviour is more effective than a drastic warning. Signage needs to be changed and moved regularly otherwise 'sign fatigue' sets in and patrons learn to ignore the signs and their content.

Signage advising of availability of counselling services is also essential. Problem gamblers know the signs are there and can then find the information at their moment of crisis. However these signs are targeting a different group, namely those who are seeking help and should not be combined with signs warning of the hazards of gambling. Brochures and particularly wallet size cards bearing the BetSafe 24-hour telephone number can be easily picked up and carried in the pocket or purse until the person is ready to make the call. We have encountered problem gamblers who have picked up a BetSafe card months or years before they made the call but kept the number as a sort of insurance for when their gambling might bring them to crisis point.

We consider that the incorporation of clocks and currency displays in gaming machine displays has been a positive step in providing gaming machine players with information about the time and amount of credits a player is gambling and total credits. In the past there was considerable discussion about the absence of clocks in gaming venues and the incorporation of this information into the screen of gaming machines can only be considered a positive innovation. The Nova Scotia Gaming Corporation Responsible Gaming Initiative¹ required video lottery terminals to be fitted with a permanent on-screen clock. It was found that the clock assisted players to keep track of time and to play within their desired limits.

Player information brochures are useful for those new to gaming and should provide simple explanation as to how machines work, and random nature of wins. BetSafe clubs display additional BetSafe brochures as part of the BetSafe program of responsible gambling. The value of brochures should be explained as part of the staff training process. Patrons needing information or counselling are more likely to take and read a brochure if it is handed to them by a staff member with an accompanying positive comment.

Problem gambling is a community health issue and it is desirable to have a general community awareness of the risks and dangers of problem gambling. Advertising should emphasize the need for the individual to gamble responsibly by setting a budget and sticking with it. Problem gambling counselling services also need to be promoted to ensure awareness.

We consider that information about each individual gambling session is not as helpful as the longer term information provided by player activity statements. This is because of the significant variations between individual gambling sessions.

Most NSW club patrons who gamble regularly are members of player reward schemes and are entitled to obtain this information by way of player activity statements. The number of patrons requesting player activity statements is very small. One BetSafe club recently reported to us that it promoted the availability of player activity statements to its 50,000 members and is disappointed that not one member has yet requested a statement.

9. Government regulation

There are significant differences in the regulation of Star City Casino and NSW clubs and hotels:

- Star City operates 24 hours per day- no mandatory shutdown.
- Star City operates table games such as blackjack, roulette and baccarat.
- Star City has no restrictions on the amount of cheques that can be cashed. Clubs and hotels have a daily \$400 limit on cheque cashing.
- Star City can hold cheques over \$5,000 for up to 10 working days before banking, thus providing a form of credit.
- Star City can advertise table games externally.

Because of its size and the availability of table gaming a casino such as Star City is likely to experience a higher level of problem gambling than clubs and hotels. Star City should therefore be subject to at least the same degree of responsible gambling restrictions as clubs and hotels, rather than the existing loose level of control.

10. Internet Gambling

The recently emerging internet gambling industries put the current stable structures in jeopardy as they operate out of poorly regulated jurisdictions within and outside Australia. They contribute little to the community by way of taxation revenue or community contributions and have inadequate responses to the issue of problem gambling. Internet

¹ Focal Research, Nova Scotia Video Lottery Responsible Gaming Features Report October 2002

gambling and telephone gambling can be done in private, which allows problem gambling to develop in secret. The provision of credit by internet gambling operators can result in serious issues for problem gamblers and encourage them to fall into debt after they have gambled all their funds. At the point of crisis there may not be anyone around for the internet problem gambler to speak to about their gambling problem. We consider that self-harm is a more serious concern for internet problem gamblers than problem gamblers who gamble at physical gambling venues where there are always staff present.

We consider that the growth of internet gambling has the potential to cause very significant harm. In particular, the provision of credit as an inducement to gamble is causing problems for many customers of internet bookmakers. Advertising of free credit by letterbox drops, billboards and unsolicited telephone calls by these bookmakers has attracted many problem gamblers who were previously managing to keep their gambling under control. We consider that all forms of interstate gambling should come under Federal regulation with a complete ban on the provision of credit, strict advertising controls and access to counselling and self-exclusion programs.

We also support the continuation of the prohibition on internet casino gambling. There is a lack of control on the international casino industry and inducements such as free credit are widespread. We believe that restricting credit card transactions with internet gambling agencies is an important means of consumer protection in this regard.

Case Study #11

A Sydney pensioner received a leaflet in his letterbox from an internet bookmaker offering him free credit to gamble. He opened an account with the bookmaker and incurred a gambling debt of \$2000. He was referred to a financial counsellor, who helped him make an arrangement to pay off the gambling debt at \$20 a fortnight over 2 years.

11. Recommendations

BetSafe makes the following recommendations:

11.1 Responding to problem gambling

The incidence of problem gambling remains unacceptably high in Australia and there is a strong need for more effective preventative measures to enhance consumer understanding of gambling and its risks. Educative strategies and the provision of information and warnings about gambling products could be more effective. This should begin at school age and continue on into adult education. The focus of gambling marketing should be on the entertainment value of gambling rather than the prospect of winning or paying for living expenses with gambling winnings.

11.2 Evidence-based strategies

It is important that responsible gambling strategies be evidence-based. Any proposed strategy should be properly researched, with its effectiveness in terms of assisting problem gamblers, as opposed to recreational gamblers, being measured.

In developing and fine-tuning its responsible gambling program, BetSafe has given close attention to research findings from Australian and international researchers, as well as the opinions of a range of experts. Where reliable research is unavailable, BetSafe relies upon its extensive experience in problem gambling counselling, feedback from counselling clients and information provided by BetSafe member clubs.

11.3 Incentives for effective responsible gambling programs

One reason why there is a lack of industry enthusiasm in many areas for responsible gambling is the lack of incentives. Those industry leaders that have taken the time, trouble and expense to implement high level responsible gambling measures are generally no better off from a regulatory perspective than the tail end of the industry that is struggling to meet the minimum mandatory requirements. We are currently seeing a differential approach to liquor regulation based upon the individual assessment of the responsibility of liquor industry venues. A similar approach should be made available to the gaming industry to encourage responsible conduct. For example, the standard of a gaming machine venue's responsible gambling program should be a key consideration in an application for an increase in gaming machine numbers. Generally a gaming machine venue that is active in promoting its self-exclusion program and counselling service will be able to demonstrate a healthy number of self-excluded patrons. This would be an effective indicator of the standard of the venue's self-exclusion program. Likewise, a series of disincentives should apply to those gaming industry participants who systematically fail to meet an acceptable minimum standard.

11.4 Improved self-exclusion and involuntary exclusion programs

There is a considerable variation in the success of self-exclusion programs. Some gaming venues actively promote self-exclusion and make the process quick and effective. Others take little interest and discourage inquiries from patrons who wish to self-exclude.

The key ingredients for an effective self-exclusion program are:

- Active promotion, so that problem gamblers are aware of the availability of the program;
- Well-trained staff, so that staff respond promptly and appropriately to patrons who seek assistance;
- Enlightened management, who are committed to the program, and ensure that staff understand that self-exclusion is encouraged;
- A speedy response to disclosures of a gambling problem. If a problem gambler does not self-exclude at the point of crisis, then the desire to self-exclude passes quickly and will be followed by further excessive gambling, further losses and further harm. Problem gamblers are impatient people and it is not helpful to make a problem gambler attend an exclusion interview some days after the crisis has passed and at an inconvenient location;
- A non-judgmental environment is important. Problem gamblers are usually embarrassed when seeking self-exclusion and poorly run self-exclusion procedures can heighten their embarrassment and discomfort.
- Clear, simple documentation is important. BetSafe has a short and simple self-exclusion deed. The Model Self Exclusion Scheme Deed published by the NSW Office of Liquor Gaming and Racing is another good example. However, many venues use lengthy self-exclusion documents full of legal jargon that may require a legal explanation. Such documentation is another disincentive to problem gamblers seeking self-exclusion.
- Self-exclusion needs to be of sufficiently lengthy duration to be effective. In BetSafe's experience, a period of at least 6 months self-exclusion is required in order for a problem gambler to have a reasonable chance to break the gambling habit. Some problem gamblers need to refrain from gambling for much longer. BetSafe does not consider it appropriate for a self-exclusion agreement to merely lapse after the agreed time period. Rather, a process of assessment should ensure that the participant is ready to take the risk of returning to a gambling environment before being allowed to return. The assessment process should include a direct assessment of the individual and the provision of third party confirmation that the person has their gambling under control.
- Enforcement of the self-exclusion. There needs to be sufficient motivation for gaming venues to effectively enforce their self-exclusions. BetSafe's approach is to warn

problem gamblers that they have agreed to forfeit any prizes they win in breach of their self-exclusion agreement.

11.5 Involuntary exclusion & Third party exclusion

All gaming venues should be required to involuntarily exclude a patron if clear evidence arises to indicate they have a gambling problem. Venues should also have procedures in place to deal with a request for third party exclusion.

11.6 Multiple venue exclusion

All gaming venues should accept multiple venue self-exclusion requests originating from another venue in their area. While most clubs in NSW will accept multiple venue self-exclusion requests, a small number refuse to accept them. Self-exclusion should be available immediately, efficient, pleasant, and achieved in a single interview.

Signed,



Paul Symond
General Manager & Founder
BetSafe Pty Ltd

Dated 30 March 2009

[1] Global Gaming Guidance Group, <http://www.gx4.com>

[2] IPART, 'Gambling: Promoting a Culture of Responsibility 2004

[3] "Gambling by Employees of Queensland Gaming Venues: Workplace Influences on Responsible Gambling and Problem Gambling"

[4] Australian Gaming Council, Current Issues Related to Identifying the Problem Gambler in the Gambling Venue August 2002

[5] Delfabbro P and others Identifying Problem Gamblers in Venues, Ministerial Council on Gambling 2007

[6] Foroughi v Star City Pty Limited [2007] FCA 1503

Appendix A – BetSafe Member Clubs

Founding Members

- Bulldogs League Club
- Canterbury-Hurlstone Park RSL Club
- City Tattersalls Club
- Eastern Suburbs Leagues Club
- Merrylands RSL Club
- North Sydney Leagues Club
- Wentworthville Leagues Club

Members

- Balmain Leagues Club
- Bargo Sports Club
- Bay Sports Club, The
- Berkeley Sports & Social Club
- Blacktown Workers Club
- Blacktown Workers Sports Club
- Canberra City Labor Club
- Canberra Labor Club
- Club Umina
- DOOLEYS Lidcombe Catholic Club
- DOOLEYS Silverwater Club
- Ginninderra Labor Club
- Grosvenor Club
- Harbord Diggers Memorial Club
- Kingswood Sports Club
- Lakemba Services Memorial Club
- Manly Bowling Club
- Mingara Recreation Club
- Mosman Returned Servicemen's Club
- Mounties Bowling Club
- Mt Pritchard and District Community Club
- North Sydney Leagues Bowling Club
- Parramatta Club, The
- Parramatta Leagues Club
- Rooty Hill RSL Club
- Seagulls Club
- South Sydney Junior Rugby League Club
- Souths Juniors Bowling Club
- Tingha Club, The
- Two Blues Rugby Club
- Vikings Sports Club
- Wentworthville Leagues Bowling Club
- Weston Creek Labor Club
- Westport Club, The
- Workers Parramatta

Appendix B – Training Courses Provided by BetSafe

Training Courses

- Responsible Conduct of Gambling (NSW) *
- Responsible Conduct of Gambling (ACT) ^
- Gambling Contact Officer (ACT) ^
- Problem Gambling Awareness
- Problem Gambling Awareness Refresher Course
- Intervention Training Course
- Intervention Training Refresher Course
- School Education Modules
- NRL Football Club Gambling Lectures

Training Workshops

- Human Resources Managers Workshop
- Marketing Managers Workshop

** Course delivered by BetSafe on behalf of Canterbury-Hurlstone Park RSL Club (registered training organisation)*

^ BetSafe is an approved provider of the Responsible Conduct of Gambling and Gambling Contact Officer courses in the ACT

Appendix C – Statistics Relating to Incidents at BetSafe Member Clubs

- **Single Venue Self-Exclusion:** 1,509 patrons have made 2,187 requests to be excluded from a BetSafe club (patrons who have requested a single venue exclusion have done so at an average of 1.45 venues)
- **Multiple Club Self-Exclusion:** 539 requests for multiple exclusion have been processed at BetSafe clubs – these have included 1,563 requests from a BetSafe venue, and 2,232 from a non-BetSafe venue (on average a patron requests to also be excluded from an average of 7.04 venues per multiple exclusion request)
- **3rd Party Exclusion Enquiries:** 201 enquiries have been received by a BetSafe club regarding a patron's gambling behaviour
- **Involuntary Exclusion:** 205 have been processed at BetSafe clubs (this includes 27 who have been processed as a 3rd Party Exclusion)
- **Breaches:** 404 patrons have been detected attempting to gain entry to a BetSafe club whilst excluded
- **Readmissions:** 298 exclusions have been rescinded at BetSafe clubs – due to the patron satisfying readmission requirements, including providing evidence that they have addressed their gambling problem.
- **Other Incidents:** 852 problem gambling related incidents have been recorded at a BetSafe club (this includes incidents that have resulted in a recommendation that the patron be involuntarily excluded)

* Statistics are for the period 1 July 1998 - 27 March 2009

Appendix D – Training Evaluation Summary

Question 1. Please indicate the level of your skills/knowledge on this topic prior to commencing this course

- Excellent – 19.07%
- Good – 49.20%
- Average – 26.42%
- Poor – 5.31%

Question 2. Please indicate the level of your skills/knowledge on this topic after completing this course

- Excellent – 50.80%
- Good – 47.53%
- Average – 1.67%
- Poor – 0.00%

Question 3. How would you rate the usefulness of the information provided in this course to your own workplace?

- Excellent – 52.40%
- Good – 41.34%
- Average – 5.24%
- Poor – 1.02%

Question 4. How would you rate the session leaders' presentation?

- Excellent – 58.08%
- Good – 40.47%
- Average – 1.38%
- Poor – 0.07%

*Evaluations were completed by 1374 attendees at BetSafe training courses in the 2008 calendar year (Statistics for BetSafe developed courses only, i.e. all courses other than the NSW RCG course)

Appendix E – Staff Survey Summary

Question 1. Do you know any staff members who you think may have a gambling problem?

- Yes – 20.09%
- No – 79.91%

Question 2. Do you think that you might have a gambling problem?

- Yes – 1.20%
- No – 90.86%
- Sometimes – 7.94%

Question 3. If you thought you were developing a gambling problem, what would you do?

- Tell a workmate – 5.56%
- Tell a manager – 8.24%
- Tell my partner or a friend – 38.08%
- Call BetSafe – 48.12%

Question 4. How do you feel when someone has a gaming machine win?

- Happy for them – 47.48%
- Nothing special – 33.95%
- I wish it were me – 10.96%
- I want to go and play a machine – 2.03%
- Don't know – 5.57%

Question 5. Do you think clubs should prohibit their staff from playing machines off-duty?

- Yes – 46.60%
- No – 53.40%

Question 6. Do you think this club is doing enough to provide responsible gambling?

- I think they are doing too much – 5.78%
- I think they are doing enough – 73.23%
- I don't think they are doing enough – 13.15%
- Don't know – 7.84%

*Surveys were completed by 1075 attendees at BetSafe training courses in the 2008 calendar year