

Queensland Community Sector Members submission to the Productivity Commission's Gambling Issues Paper 2009

Scope of our interests

Problem gambling is a serious issue in public health. The Queensland Community Sector welcomes the Productivity Commission's current inquiry into Australia's Gambling Industries and appreciates the opportunity to participate in this process. The Community Sector Members of the Queensland Responsible Gambling Advisory Committee share a commitment to continued work with the gambling industry and government to collaboratively address issues around responsible gambling. Our intention is to provide a unified voice to achieve appropriate and necessary action to safeguard individuals and the community against the negative impacts of gambling.

This submission has been informed by many years of experience advocating on behalf of those most affected by problem gambling. Our sector works closely with individuals, families and communities affected by problem gambling and we are at the forefront of efforts to address gambling related harm in Queensland.

The following submission is solutions focused and offers many practical, cost effective recommendations for mitigating the social costs of gambling. A full list of organisations endorsing the submission is included under section 8. The submission has been arranged under the headings used by the Productivity Commission's Issues Paper and with subheadings derived from the questions contained therein.

3 Participation and profile of gamblers

We believe that although the percentage of problem gamblers may appear low to some, the reality is that problem gamblers are a much larger percentage of those who gamble regularly, particularly at EGMs and TABs, and they churn through considerably more money than recreational gamblers in a session. We believe at least 48 per cent of total gaming machine revenue is sourced from problem gamblers, while around 37 per cent of total gambling revenue is sourced from this group.¹ In 1999 the Productivity Commission estimated that 15 to 30 per cent of regular clientele at gambling establishments are problem gamblers. We urge the Commission to update these figures, and the percentage of revenue that is sourced from problem gamblers in the current Inquiry.

Gambling Instruments - Concerns with the CPGI

As opportunities to gamble continue to increase in the community, so do the number of people deeply and negatively affected by gambling. Estimates of the proportion of vulnerable Queenslanders vary, however the Community Sector believes the number affected far exceeds the number quoted by the Queensland State Government and the Gaming Industry. Despite the Queensland Household Gambling Survey (QHGS) being one of the world's largest telephone polls to measure the prevalence of problem gambling, the Community Sector shares the Productivity Commission's concern over the reliability of telephone polls in identifying problem gambling.

¹ J. McMillen et al. 2001. *Survey of the nature and extent of gambling and problem gambling in the ACT*, Australian Institute for Gambling Research, Melbourne.

The first concern in relation to QHGS has been raised time and again in relation to remote Indigenous communities in the Cape and around Cairns, but is also relevant to disadvantaged households in general. Phone based surveys are yet to reconcile the problems created by those problem gamblers from extremely disadvantaged households without telephones. We believe the inclusion of this group in these surveys would not only significantly raise the estimates of problem gambling in Indigenous households, but also raise the estimates of problem gambling among the general population.

Secondly, at the time of the first inquiry the Productivity Commission estimated that only one in three problem gamblers were likely to be honest in a government administered poll. The Community Sector notes that since 1999, very effective public health campaigns may also have had the unintended consequence of stigmatizing problem gambling further, thus making participants in the QHGS even less likely to be honest in government phone polls. Indeed, as public awareness and health campaigns become more effective, people may be increasingly less likely to be honest about gambling problems. If in 1999 the Productivity Commission estimated that only 1 in 3 would be honest in a phone poll, it is important to also update this estimate and allow for the impact of social marketing campaigns in Queensland before gauging the real prevalence of problem gambling in this state. It may be that only 1 in 5 or 1 in 10 people are now likely to give truthful answers in a government run gambling poll and by determining this number CPGI based surveys such as the QHGS may produce more robust results.

What has happened to groups identified by the 1999 report as ‘at risk’?

It is hard to determine what has changed for groups identified in 1999 as being at risk of experiencing gambling related harm in Queensland. This is partly attributable to deficiencies in the responsible gambling research regime in Queensland. In particular, problem gambling and the impacts of unregulated gambling on Indigenous communities remains a huge gap in Queensland based research. Young people also remain at risk.

For young people the risks are twofold

The 1999 report identified young people as at risk of developing problem gambling. This resulted in the development of a number of school based early intervention programs in Queensland. The Community Sector Members call for an independent evaluation of these programs for effectiveness. Studies in relation to effective social outcomes for students show young people benefit from having access to honest and direct information and from campaigns that are reinforced regularly over time.² For example, educational activities that take place each year in Gambling Awareness Week for all school children will provide better results than one off campaigns and ad hoc use of resource kits.

Moreover, strategies for promoting responsible gambling to disengaged young people who are not taking part in mainstream education or employment must also be developed. This group will miss out on any benefits from Teaching Resource kits. In addition, this group is likely to be living in disadvantaged circumstances and may possibly be at a greater risk of problem gambling. The success of the NSW based ‘Gambling hangover’ campaign could be assessed in relation to this group.

However young people can also be placed at risk by the problem gambling of a caregiver. Young people should be included in the third parties who can exclude a care giver from

² M. Flood. Changing Men: Best practice in sexual violence education. *Women Against Violence*, 2005/6, 18: 26-36.

gaming venues as is the case in Sweden. Children and young people have the right to an adequate standard of living under article 27 of the *United Nations Convention on the Rights of the Child* and if a problem gambler in a household is depriving a young person of this right they should be able to access third party exclusion to help them regain an adequate standard of living. Provisions to make this process accessible to young people, including minors must be implemented. Given the correlation a number of Australian and International reports since 1999 have identified between caregivers who are problem gamblers and the development of problem gambling in young people, this would seem an important priority for policy makers.

Research priorities

The recent evaluation of the Queensland Responsible Gambling Strategy suggested the focus of research in Queensland is on enhancing responsible gaming policies and programs. This research must include addressing specific groups at risk through new research, new policies and new programs. For example, the bi-lingual worker model might be investigated for CALD and refugee groups. Moreover, the Community Sector Members rightly express concerns over the conflict of interest in Government administered research because Governments need to represent themselves as effectively addressing problem gambling. We believe this has continued to occur in Queensland in spite of the Productivity Commissions recommendations in 1999. A more transparent, forward planned and accountable research agenda is called for that is closely aligned with the national agenda.

New groups of problem gamblers: New & emerging communities

A number of community organisations with a multicultural focus have begun identifying new and emerging communities as at risk of problem gambling. These communities face additional problems accessing help with limited English language skills and an alarming lack of resources available in culturally appropriate forms.

The Community Sector is concerned that new and emerging communities are being overlooked by the research. In some cases, new and emerging communities may need to be provided responsible gambling material in alternative forms to printed media, for example, information may be delivered in information sessions, in CD's and through other audio visual modes of delivery.

All mainstream harm minimisation measures need to be accessible by culturally and linguistically diverse groups. For example, information in gaming venues advertising help services needs to be provided in community languages. Awareness campaigns including information about the chances of winning also need to be provided for CALD communities. The national gambling help website must incorporate information and support in CALD languages including those used by new and emerging communities. The South Australian model is a useful reference in this regard.

New groups of problem gamblers: Chronically homeless & prison populations

Other groups of people often overlooked by the research are the chronically homeless and prison populations. Feedback from our services suggests many homeless people, of both sexes, identify as problem gamblers. In fact, social research suggests that problem gambling is the primary cause for homelessness in 15 to 20 per cent of all cases.³

³ D. Hoare. *Problem gambling a 'root cause of homelessness'*. ABC News. January 29, 2008. www.abc.net.au/news/stories/2008/01/29/2149351.htm

Addressing problem gambling in the rough sleeping population will be an important task for governments in working towards the targets laid out by the recent Whitepaper on homelessness. Research in this regard should also explore the nexus between wagering services such as the TAB and people experiencing homelessness.

Tertiary prevention programs and support workers that target these two groups also require significant investment and development.

4 Impacts of Gambling

Low income households are most affected by problem gambling

Electronic Gaming Machines (EGMs) are often concentrated in disadvantaged areas where the communities are least able to afford the social and economic costs of problem gambling. For low income households the impacts on family relationships and wellbeing is magnified. Services often find problem gambling to be a major factor in the incidence of domestic violence in disadvantaged households where the added strain of gambling losses can rapidly deteriorate relationships and lead to physical abuse.

Problem gambling in remote and Indigenous communities

This remains one of the most under researched and under resourced areas of problem gambling in spite of continued higher rates of incidence among Indigenous populations. In particular the impacts of card skills and unregulated gambling need greater attention. Consultation with our members working closely with communities in these areas suggests the impacts of these card games can be mixed. In some communities these games can build social capital through providing an affordable networking experience and building community capacity. However, the impacts of gambling vary widely between Indigenous communities and make it difficult to generalise. Problems can arise when extended periods of game playing can lead to child neglect and when the winnings quickly leave the community via regulated gaming venues.

In all cases the community sector continues to advocate for a community development approach to addressing problem gambling in Indigenous communities. Reports from our members who work in this area indicate that collectivist values in Indigenous communities can often lead to difficulty identifying problem gambling in the first instance. An individuals gambling may be quite severe before it is recognised owing to the relatively common practice of couch surfing and sharing resources; exacerbated by a lack of knowledge and understanding of problem gambling. Community development models should build on existing services to ensure problem gambling is screened for in all health and mental health services and that health and community practitioners *based in the community* are upskilled to deliver problem gambling treatments.⁴ Resources must also be developed in local Indigenous languages to aid identification of problem gambling. Important work has been done in this regard by Lifeline Cairns with themes that include how to identify ‘good borrowing’ and ‘bad borrowing’ to build greater capacity in to Aboriginal and Torres Strait Islander communities to identify occasions when it is healthy to lend a friend or relative money from when it is not healthy.

⁴ For example, the work of the Wellbeing Centers operated by the Royal Flying Doctors in Cape York is generally regarded as a best practice model in delivering in-situ gambling counseling and support services.

As with the general population, co-morbidities play an important role in the treatment of problem gambling for Indigenous communities. In terms of regulated gambling, problem gambling often constitutes a kind of self medication for depression and other mental health problems that can also be closely related to drug and alcohol problems. With Indigenous communities representing the most disadvantaged communities in Australia, gambling problems create considerable tensions in personal relationships, and frequently lead to relationship breakups and domestic violence. Given the advances in our understanding of problem gambling and its impacts on the health of individuals since 1999, problem gambling needs to be recognised an essential part of holistic efforts to 'Close the Gap' in Indigenous health outcomes.

A letter to QCOSS putting regional impacts in context

Previous to my present role, I was a publican in a community of 1500 people. Eventually the local Bowls Club introduced 10 machines. These were extremely popular and the community could see an improvement to the services provided by this mostly 'volunteer run' establishment which had limited hours of business. Other local sporting clubs benefited as well.

There were drawbacks, as this community had a high percentage of people on benefits or were in the low socio economic range. One of the hotels in the main street then introduced more poker machines. This made the machines available to the public from 10am to 10pm. It was recognised in such a small community that mums were dropping their children at school, parking in front of the grocery store, and spending time in front of the machines.

The need for social assistance rose within the community because of the easy access for all ages and social status. Of course the disposable income was then shared between the poker machines and the community. With this area already struggling to survive, more pressure was placed on the local volunteer groups, medical services and the local Shire to provide structural and social services. My point is that there is a need to limit the number of machines available to each community and responsible practices endorsed.

- Community Development Officer, Chinchilla, March 2009

Accessibility to EGMs

Accessibility to electronic gaming machines (EGMs) continues to be a major factor contributing to problem gambling, with EGMs accounting for 80 per cent of those presenting at Gambling Help Services⁵. Put simply, the continued proliferation of poker machines will continue to raise the costs to families and the wider community. The Queensland Office of Gaming Regulation's website data on metered wins reveals that in the Gold Coast City Council area, for example, losses by patrons to EGMs in hotels and clubs rose from \$122 million in the financial year 1999-2000 to \$284 million in 2005-06. This represents a 133 per cent increase in losses in just six years.

Furthermore, growth in machine numbers since 1999 has not been evenly spread across communities, and we know that the costs of problem gambling are likely to be greater for communities with a higher concentration of EGMs. For example, the Moreton Statistical Division has an average of 17 EGMs per thousand adults, a number that far exceeds the accepted range of between 7 and 10 that has been determined as relatively

⁵ Department of Justice, Victoria report. 2005. *The Experiences of Problem Gamblers, Their Loved Ones and Service Providers-Round 3*, p 84

safe by research.⁶ On this basis, the Queensland Community Sector believes applications for the extension of trading hours for gaming venues should be refused and all gaming venues should have their current hours reviewed and curtailed where independent community consultation reveals this to be in the public interest.

Have measures introduced by governments since 1999 impacted on the social costs of gambling? What are the regional impacts?

Absolutely, every dollar invested in prevention and early intervention strategies has been shown by a growing number of Australian and international studies to not only yield between \$3 and \$16 return in the medium to long term, but also to prevent costly social and emotional crises.⁷ Governments must also increase investment in secondary prevention and early intervention strategies that target Aboriginal and Torres Strait Islander communities, young people, refugee groups, CALD communities and other groups identified as at risk by research. Prevention and early intervention efforts for Aboriginal and Torres Strait Islander Communities should build on successful models currently used in South Australia and by Cairns Lifeline.

It is also agreed among the members of the Community Sector that the moratorium on growth in machine numbers and attempts to limit the proliferation of poker machines has prevented negative impacts on what the Productivity Commission referred to as the 'social fabric' of communities in its 1999 report.

Nevertheless, while in 1999 the Productivity Commission found no correlation in Queensland between lower socio economic areas and higher densities of gaming machines, the Queensland Community sector is concerned over the high density of gaming machines in disadvantaged areas. This means that in the last ten years the social costs of gambling in Queensland have become more highly concentrated in communities that are least able to bear them. Worse still, this has taken place after the Productivity Commission identified the trend in other jurisdictions over a decade ago, suggesting inadequacies in Queensland's current licensing requirements.

What are the impacts of gambling on social capital?

Gambling reduces social capital in a number of ways. Firstly, it takes time from other activities that people might choose to engage in that would build social capital and a sense of community well being. Secondly, gambling by nature is designed to reduce the material funds of a community that would otherwise be available for activities that would build social capital. Finally, many forms of gambling, including EGMs and TAB services erode social capital through isolating individuals from their communities while they engage in gambling. Anyone who argues TAB services provide opportunities to build social capital through interaction with other community members has not been to a TAB service and is ignoring the fact that TAB services are available online. Furthermore a recent study found casino based gambling and associated factors exacerbate declines in

⁶ Dr Paul Delfabbro. 2002. The Distribution of Electronic Gaming Machines (EGMs) and Gambling-related Harm in Metropolitan Adelaide, Department of Psychology University of Adelaide. This report mentioned a figure of 10 EGM/thousand. However, other research in Scandinavian countries has placed an upper limit of 7 per thousand. Whichever figure you look at requires a very substantial reduction in present numbers in Queensland

⁷ QCOSS. 2007. The Cost effectiveness of Early Intervention Programs for Queensland, Social Policy Research Centre, University of New South Wales.

social capital in communities that are within 24 kilometres from a casino.⁸ This is a particular concern for Queensland given the state has more casinos than any other state or territory in Australia and more poker machines per capita.

5 Taxation and regulatory arrangements

The Queensland Government has competing interests

The Government has a clear conflict of interest in regard to the provision of gaming and gambling in Queensland. It is the regulator, the recipient of very substantial tax revenue, and the only practical source of funding for new research. It also funds the only major public health campaigns and controls the Gambling Help Services funding and contracts. We propose a special new levy below as a first step towards managing this conflict.

It is also important for the Commonwealth to consider as part of this inquiry financial incentives and compensations for states to offset and reduce their financial dependence on gambling revenue. Such moves can be justified by the money the Commonwealth stands to save in the long term by reducing the social and economic costs of the gaming industries.

A new levy

The Community Sector Members call for a new levy on all gambling revenues derived by the operators to increase funding for:

1. Independent research projects into problem gambling and associated issues
2. Public awareness campaigns (including campaigns specifically targeting CALD, Indigenous, young people & refugee groups); and
3. Resourcing Gambling Help Services.

The burden of proof must be shifted

In advocating on behalf of those affected by problem gambling the Community Sector is often told to provide research to found objections to increased gaming availability. We propose a paradigmatic shift in the future of gaming regulation, one that places the onus of proof on the government and industry to provide substantive research showing proposals for the development of gaming services are in the public interest.

New licences

The Community Sector believes regulatory arrangements in each jurisdiction should be amended such that new gaming machine applicants are obligated to show a real public demand and need for more machines before they are approved. The same rule should apply to proposed new establishments. This would address community sector concerns over the often inadequate public consultation processes undertaken by applicants and the inherent conflict of interest of government agencies responsible for granting licences. While the Productivity Commission showed in 1999 only 1.7 per cent of the population was in favour of expanding EGM numbers, concerned community members may often be intimidated by confronting the license applicant with their views under current public consultation provisions. This is especially relevant to rural and regional communities where the applicant will often also be a neighbour and a friend.

⁸ M. Griswold & M Nichols. Social Capital and Casino Gambling in U.S. Communities. *Social Indicators Research*. Vol. 77, Iss 3. 2006: 369-394.

Existing Licences

The Community Sector calls for a review of all existing poker machine licences in Statistical Divisions where the ratio of machines is found to exceed the accepted range of 7 to 10 per 1000 adults. Government should take steps to facilitate the selling of these licenses to licensed venues in regions where the ratio is within the accepted level if and when future applications are submitted.

Reasonable opportunities should also be taken to reclaim licenses where venues fail to comply with or show reasonable commitment to a mandatory code of practice.

Wayne Goss regrets bringing poker machines to Queensland

Courier Mail September 19, 2008

FORMER premier Wayne Goss, who introduced poker machines to Queensland, has admitted they are a "scourge" he now regrets allowing into the state. Wayne Goss, Queensland premier from December 1989 until February 1996, said although it was long-standing Labor policy, it was a mistake to bring in gaming machines in February 1992.

Within a year, there were 9332 pokies in 405 clubs and 298 hotels throughout Queensland. By last month, the state's pubs and clubs had 41,527 operational pokies and Queenslanders were losing a record \$173.32 million a month - or \$5.5 million a day - to gaming machines.

Speaking on a panel at the Queensland Writers Festival in Brisbane yesterday, Mr Goss, pictured, was asked if he had any regrets about his political career.

"I wish I'd never brought in poker machines, I think they're a scourge," he said.

"The problem with poker machines in my view is that the people who mainly play them are the people who can least afford to do so. I wish I hadn't done it."

Regulation for TAB services

Regulation must not lose sight of gambling related harm resulting from forms of gambling other than electronic gaming machines. There is growing concern among the Community Sector Members about the harm that takes place in TAB services. These services are subject to less regulation than poker machines in spite of feedback from community organisations that many problem gamblers congregate at these sites. A number of harm minimisations strategies currently in place for poker machines, such as regular public health messages on screens and promotion of self exclusion programs could be readily adapted to these environments.

What impacts on the quality of policy have changes in the governance and administration of regulatory frameworks had since 1999?

The tripartite approach of the Responsible Gambling Advisory Committee bringing members from industry groups, government and the community sector is generally agreed to have yielded good results, including building awareness of each others interests and work.

However this approach may have also resulted in compromises that have been to the detriment of Queensland's communities. For example, the introduction of a voluntary

code of practice under the RGAC rather than a mandatory code, and the absence in this code of more stringent provisions for protecting consumers that is evident in other jurisdictions. For example, in the ACT, NT, NSW and SA clocks are compulsory in gaming areas, in Queensland venues are only required by the voluntary code to “implement practices to ensure that customers are made aware of the passage of time.” The result has been that clocks are rarely visible in Queensland’s gaming areas and casinos.

Further still, the Community Sector Members continue to express our concern over the asymmetrical balance of resources available to each of the three sectors represented on the RGAC. The Community Sector, unlike the Gaming and the Government Sectors, has very limited resources to research and advocate on behalf of those affected by gambling related harm in Queensland. More resources would not only allow us to better represent our sector at the RGAC, but would ultimately support the improvement of service delivery to those affected by gambling related harm.

Challenges in regulation

One of the biggest challenges yet faced by those concerned with the regulation and treatment of gambling issues is the prospect of digital television acting as a gaming device in lounge rooms around the country.

6 Consumer protection measures

Consumer controls: Self exclusion

The Community Sector believes the promotion of self-exclusion programs is primarily the responsibility of each venue. Codes of Practice should ensure gaming venue staff are trained the active promotion and administration of self-exclusion programs. It is also technically feasible to program EGMs to scroll advertisements for self exclusion programs. These should be installed in all machines as a condition of licensing and similar provisions for TAB screens should be developed and introduced as a matter of priority.

Self exclusion processes should be reviewed to identify actions for making the regimes more ‘user friendly’. The success of these programs in Aboriginal and Torres Strait Islander communities, as well as CALD communities should also be explored. Registries should be centralised to facilitate region-based exclusions and overcome the disparities faced by problem gamblers in regions with a high concentrations of venues. For example, under the current Queensland program, cumbersome forms and photos required by each venue for self exclusion makes self-exclusion virtually unachievable in areas such as Brisbane and the Gold Coast where there is a high concentration of gaming venues in a small geographic area. Biotechnologies, such as the use of fingerprints to register excluded gamblers, hold some promise in this regard.

Informed choice: Ethical promotion & inducements to gamble

It is our belief that the aggressive promotion of poker machines within venues in Queensland is one of the largest contributing factors to ongoing problem gambling in our communities. Inducements to gamble are a well recognised issue for consumers and bans against them need to be legislatively enforced under a universal mandatory code. We do not believe it is ethical or acceptable from a public health perspective to offer people inducements or prizes such as ‘free spins’ to prolong or extend their playing. In many venues “pokie promotion” hours are the gaming equivalent to the promotion of

binge drinking. Lucky spots, grocery grabs, super draws etc are designed to keep patrons gambling and constitute inducements to gamble. People who are attempting to control their gambling find it very hard to resist such promotions and often stay much longer at the machines than they intended, with quite negative consequences. We contend that promotions of this nature should be outlawed under a legislatively enforceable Code of Practice.

Special provisions for 'High Rollers' such as onsite smoking also need to be recognised as inducements to gamble and send the detrimental message to Australian communities that spending more at casinos will bring you special status and privileges. If smoking is banned in every other Queensland venue that serves alcohol, it sends a very dangerous message to young Queenslanders if people who categorically spend large amounts of money on gambling in casinos are afforded special privileges and glorified status. It is important that the government sends clear and consistent messages about responsible gambling. Inducements to gamble should be banned consistently across social groups and governments must sooner or later recognise that in an industry more analogous to the tobacco industry than the entertainment industry, loyalty programs of any kind should be legislatively banned in the interest of harm minimisation.

Venue/Games restrictions: Machine Programming

Machine programming should be changed under a mandatory code so that machines operate a maximum of six cycles per minute. This was identified as an effective harm minimisation strategy in the report completed by Livingstone et al (2008).⁹

All players of EGMs should be provided with opportunities to control machine variables in ways that facilitate a harm minimisation approach to gambling. Examples include a pre-commitment to expenditure limits and the ability to mute machine sounds.

Machines should also be programmed with public health messages and include information about player losses and helpline phone numbers as part of player information displays.

Cashing cheques

Venues should be prohibited from cashing cheques that they have issued to winning players. This clearly contravenes the intention of regulations in Queensland concerning limits payable in cash. These limits should be standardised across jurisdictions with appropriate and explicit legislation in the interest of consumer protection. Venues found to breach these regulations should face heavy penalties, including the instant loss of licenses. Under the current regulation in Queensland, it has been reported that some venues continue to cash prize cheques the same day they are issued.

A mandatory and universal Code of Practice is a good idea

The Community Sector members support the development of a National Mandatory Code of Practice that builds on the strength of each jurisdictions experience as a matter of priority. Such a Code would reinforce the future work of the RGAC and policy direction in Queensland. A universal code would protect consumers, especially young people, in the highly mobile modern society that Australia has become. It would also

⁹ Livingstone, Charles and Woolley, Richard (2007) 'Risky Business: A Few Provocations on the Regulation of Electronic Gaming Machines', *International Gambling Studies*, 7:3, 361 – 376.

minimise competitive advantages between states as they would no longer have to choose between protecting consumers and losing revenue to other jurisdictions.

Venues that fail to comply with or show commitment to the code of practice should lose their licences permanently in recognition of the considerable risk to public health that they present.

Duty of care provisions

Venues should also face heavier fines, including the loss of their license if they are found to be breaching duty of care by allowing intoxicated people to continue gambling. Counselling services consistently report cases of people with impaired decision making ability being allowed to continue gambling. The Gaming Industry needs to be proactive in issues of duty of care in such cases. Our position is that if a patron is allowed to keep gambling when a reasonable person should have realised they were suffering impairment in decision-making ability, then there is a very clear breach of duty of care. This may require considerable staff development for gaming venues and the establishment of more stringent staff supervision of gaming rooms.

To what extent have industry and government actions since 1999 dealt with the inadequacies in arrangements previously identified by the Commission?

While Queensland has achieved a greater degree of consistency and coordination in its approach to consumer protection than it had in 1999, several inadequacies in arrangements identified by the original Productivity Commission inquiry remain:

- ǎ A conflict of interest still exists with the State Government leading the attempt to reduce the social harms from gambling, this includes concerns over the very small amount of research that has been completed in Queensland since 1999 and the lack of a clear research agenda.
- ǎ The Community sector members remain concerned about the voluntary nature and lax enforcement in some cases of controlling advertising and inducements to gamble. Inducements to gamble must be legislated against in Queensland and extended to include special privileges awarded to 'high rollers' in Queensland casinos.

Smoking in gambling venues

Since 1999, new laws in Queensland have prohibited smoking inside venues. This has had the unintended consequence of forcing problem gamblers, who are also often smokers, to have a break in play. The Community Sector is gravely concerned about reports from a number of Queensland regions indicating a number of pubs and clubs are reconfiguring their establishments to allow for smoking in gaming areas. Smoking in all gaming venues, including 'high roller' suites in casinos should be explicitly outlawed as a matter of priority.

Smoking areas of clubs are ideal places for displaying posters and Gambling Help Service contact details. Cigarette breaks allow opportune moments for gamblers to be exposed to public health campaign messages about responsible gambling, and are ideal opportunities for venue staff to approach a patron they suspect of problem gambling to offer support. Cigarette breaks away from EGMs also reduce the hypnotic effect of the machines and gives players an opportunity to consider their spending. Allowing venues to reconfigure themselves to accommodate smoking in gaming areas would be a significant step backwards in reducing gambling related harm in the community.

7 Government programs relevant to gambling

Should greater attention be given to educating young people about gambling, particularly in relation to financial literacy?

Yes and these services must be also be targeted to disadvantaged young people not engaged in mainstream education and employment. Mainstream efforts in this regard must be sustained and reinforced over time, provide clear and honest information and build on the strengths of existing resources such as the teaching kits currently available in Queensland.

8 Organisations endorsing this submission

The **Community Sector Members** of the Responsible Gambling Advisory Committee drafted this submission and report to the Queensland Treasurer through the Queensland Responsible Gambling Advisory Committee. They are:

Andrew Davis, Chief Executive Officer, Relationships Australia

Jill Lang, Director, Queensland Council of Social Service

Reverend Noel Preston, Representative of the Heads of Churches

Barry Sheehan, Executive Director, Centacare Toowoomba

Nick Xynias, Ethnic Communities Council Queensland

Other Organisations & Individuals

Queensland Shelter

Australian Pensioners' & Superannuants' League

Centre Against Sexual Violence, Woodridge

Centacare Cairns

Sera's Women's Shelter¹⁰

Laidley Shire Community Care Association Inc

A.C.C.E.S. Services Inc, South East Queensland

Community Settlement Service, Inala Community House

Brisbane Youth Service

Noel Condie, Manager Gambling Help Service, Relationships Australia Gold Coast

Derek Tuffield, Lifeline Darling Downs

Doreen Goldsmid, Chinchilla Family Support Centre

Linda Drake, Lifeline Coral Coast Capricorn

Dr Wayne Sanderson, Principal, Re-imagine Associates

¹⁰ The location of Women's Shelters are not disclosed to the public in the interest of personal safety for clients and staff.