

**Productivity Commission
Public Inquiry into Gambling 2009
PokieWatch.org Submission**

Essential Points

PokieWatch.org is Wikipedia based website that records inspections of over 180 pokie pubs and clubs by Paul Bendat. This submission provides evidence and observations gathered from those inspections.

The Commission is asked to adopt of the following submissions;

1. Exposure of children to the sights, sounds and promotion of pokie and other forms of gambling in pokie venues should be eliminated
2. Having regard to the stakeholders actual performance, prescriptive regulation is needed to implement consumer protection measures.

These submissions connect to issues considered in section 6 of the 2009 Issues Paper and section 16 of the 1999 Inquiry Report.

Exposure of children to the sights, sounds and promotion of pokie and other forms of gambling in pokie venues should be eliminated

"One of the ways in which pokie gambling is 'normalised' - made to seem like an everyday, average sort of activity - is by exposing young children to poker machine venues in the company of family and friends. Just as smoking, drinking and poor eating habits are passed on by example, allowing children to accompany adults to gaming venues, and indeed encouraging this by providing play rooms, free meals and so on, is likely to result in the development of problems later in life. Pokie gambling is a potentially dangerous activity and children should not be encouraged to think it's just another harmless pastime."

Dr Charles Livingstone
Department of Health Social Science
Faculty of Medicine, Nursing and Health Sciences,
Monash University:

The above statement explains why children should be removed from exposure to the sights, sounds and promotion of pokies.

1.1 1999 Productivity Commission Report

With respect to children and gambling the 1999 Report (Volumes 1 and 2) considered;

- The effect of adult problem gambling on children - 7.31-7.37,
- Trade promotions involving children – 13.49,
- Public health education about problem gambling for children – 16.33,
- The prohibition of children from entering the pokie area,
- Advertising that encouraged children into pokie venues - 13.19, and
- Internet gambling – Section 18.

Other than mentioning the prohibition in NSW (13.19 – “Parents are not encouraged to bring children to the complex in any advertising or promotional material.”); it did not consider campaigns marketing to families with children as presently conducted in Victoria, South Australia and Queensland.

It is not helpful to consider why this issue was omitted in 1999. There are three possible reasons; it was not relevant, it may not have been submitted; the current marketing focus by pokie venues did not exist. The fact is that attracting families with children is a focus of pokie pub and club marketing today.

1.2 Attached Schedules and PokieWatch.org

A significant part of this submission are tables setting out evidence gathered from visits to approximately 180 pokie pubs and clubs. Most of these venues have been visited twice. They are located in either Queensland, South Australia or Victoria.

The evidence supports the conclusion that families with children, once inside pokie venues, are being exposed to the sights, sounds and promotion of pokie gambling. These tables also detail the existence of child play areas.

Hotel names written in blue are considered adult orientated venues where there appears to be scant appeal to families with children. It is submitted that there will little cost and no inconvenience to patrons who seek the adult entertainment of pokie gambling if children are banned from these venues.

Please note that while contemporaneously handwritten notes support all observations; there may be mistakes in recording what was seen. All venue operators have been informed of PokieWatch.org

Full inspection notes are found on www.PokieWatch.org.

In support of the marketing focus of these pokie operations; PokieWatch.org publishes photographic evidence of external advertising on about 180 pokie pubs and clubs that target families with children. Every venue mentioned in the attached schedules is detailed on its own web page on PokieWatch.org. Over 1,000 pictures have been taken. A selection of photos have been published in a book that has been provided to the Commission.

In the main, these pubs and clubs are either associated with or owned by Woolworths Limited, Wesfarmers Limited ("Coles") but venues owned by others are included. Woolworths and Coles were selected because of the size of their pokie operations and their financial strength.

Victoria - PokieWatch.org - Sights & Sounds Observations

Hotel	Pokie sights and sounds in eating area	Child play area, video games, promotion
Aces Sporting Club	Asian Palace restaurant. Separated from pokies room by clear glass wall.	No play area. Located within a driving range miniature golf complex.
Albion Charles	Limited to sports bar although the whole interior of this venue is one large area which includes the pokies, food area and the TAB.	None.
Ashley	The design of the bistro area is such that the gaming room is totally visible and audible. It is effectively the same room. There are but a number of wooden slats highlighting rather than impairing visibility between the two rooms. The bistro area is also open to the TAB. There are no visual dividers. In this way, the children observed eating were bombarded with noise and vision from both these gambling activities. A KENO screen was affixed in the bistro area.	None.
Balaclava	Yes. Doorway between two areas.	None.
Batman's Hill on Collins	No	None. Note this venue has glass windows and doors allowing street visibility. It is near the Spencer Street station between the Docklands football stadium and the Crown casino car park. This car park is used by families attending football games.
Bayswater	Entrance opens immediately onto gaming room. Bistro is located to the right.	Yes. Kid's parties promoted on the glass wall of the play area. Children can look directly into the pokie area from the play area across the bistro. Free face painting every Friday and Saturday. Coin operated game of chance machine installed in the play area called "Winner Every Time". Poster in entrance (one looks at the pokies directly behind it) promoting "Guitar Hero For Kids.

Berwick	The bistro is at a lower level than the gaming room. A diner could observe the feet and lights of the pokies through the glassed lower portion of the wall that divides the rooms. There is an open passageway. The level of pokie noise is likely to be slight because of the different levels.	None. Offers a "Kids Menu"
Blackburn	None. Pokies room has separate entrance	None.
Blue Bell	Limited to about 3 tables from Howitt Street entrance. The door to the bistro from the car park entrance was locked although the entry to the gaming room through the same door was not. Accordingly, anyone who wanted to go to the bistro either had to walk through the gaming room or walk back through the car park to access the Howitt Street entrance.	None.
Boundary	Limited. On other side of entrance from the car park.	The kids play area is located directly across the entrance from the pokies. Gaming room is clearly visible through a clear glass divider from the kids play area. The Boundary Hotel's website promotes "We cater for kids".
Braybrook	At main entrance. Door between the two areas was left open allowing both noise and vision in the bistro area.	Menu for children offered.
Bundoora	Visible around the bar but eating area buffered by a lounge area.	Yes. Toy Soldier machine plus one other. Located in strip shopping centre.
Burvale	No. If entering from car park there is a large direction sign pointing to the pokies with a large open entrance. Other sign points to the bistro which is another room.	None. Offers child menu.
Century City	Open entrance to bistro. Sports bar separated by frosted glass	This pokie hotel is located in a mall and is clearly visible to all passers-by. It is almost directly opposite the box office for the Village cinemas where children line-up.

Chelsea Heights	Yes. There is a 24 seat raised area divided only by a clear glass wall from the gaming room. The glass wall has some design on it which partially obscures the gaming room.	Yes. Extensive external promotion targeted at families with children including free meals, playground and child orientated entertainment. Web page devoted to Kid Shows on web site.
Cherry Hill	Opaque divider wall with large gap between top of the divider and ceiling. This allows pokie noise to be audible in bistro.	Located on other side of bistro. "A Winner Every Time" and Toy Soldier coin operated vending machines installed. Kid's Fun Week promoted in venue entrance.
Club (Ferntree Gully)	Upon entry, in lounge section and when getting served. Limited vision where patrons would sit.	Visible to passing traffic as located in corner pictured above. 2 x video games. "Cool Age" coin operated game. Owing to solid part of the wall, cannot see children in the play area unless close by or in the area.
The Club	They share a common entrance. There is another bar area immediately adjacent to the pokies room. This area had numbers on tables dential to room with food table service. This area is noted as a 'café' on The Club web site.	Yes. Web site promotes a kids X Box corner & play area. Play equipment was outside the building and susceptible to rain. Sign indicating that children must be 'monitored' by an adult. Child menu.
Club Leeds	Audible as it is an open area. The eating area is around a corner in the building from the pokies area.	None.
Coach and Horses	Wide open shared entrance.	Yes. Promotes itself on its web site as "Ringwood's leading family entertainment venue". "We offer a marvellous indoor kids playground."
Commercial (Werribee)	The eating area on the other side of the bar was more like a lounge. The bistro itself was an entirely separate room with its own entrance.	None.
Coolaroo	Bistro and gaming room share the same entrance. A part of the bistro entrance is a wood and glass wall. However, most of the seats in bistro area have no visibility to the gaming area	Web site promotes children play area with the following note: "Our new playroom is positioned next to the bistro. The playroom allows the grown ups to have their meal while the children have fun, all the while visible from the bistro area."
Court House (Brunswick)	Not recorded	No

Court House (Footscray)	Despite construction which now appears to be completed, the back area seems to be a dedicated bar rather than a bistro.	None. This hotel is located in a shopping street next to a sexual aids store. Pokies all visible to the street every time the automated door opened.
Cramer's Hotel	Common entrance to bistro and gaming room from Cramer Street. Ned's Bistro also has its own entrance.	Located on opposite side of Ned's Bistro. "Win and Grin" claw machine installed.
Croxton Park	Open doorway. The cashier's area of the bistro has wooden divider between it and the pokies. When eating, one can hear pokie noise.	Kids' area in front closest part of bistro to gaming area. Can see pokies clearly through clear glass wall. Gaming room 10 paces away. Claw machine and chocolate machine installed. Placement remains worst practice of any venue inspected due to proximity and visibility to pokies.
Daisey's	Limited other than when entering bistro. Wide open shared entrance.	Coin operated games of chance with a reward installed; Win n' Grin, A Winner Every Time, Chocoholic plus three other video games.
Deer Park	There is a beer garden that separates the bistro from the gaming room. Both areas have large clear glass windows that provide diners with a view of gaming activities.	Yes.
Diamond Creek	Entry from car park requires patrons to pass by the pokie room. Overheard children commenting on the pokies as they passed by. "I don't know how to play them".	Located on other side of bistro.
Doncaster	Gaming room visible on entry. Also visible from service bar in bistro which is near to the open entrance to the gaming room.	Yes. Visible to the gaming room across the bistro. Heavy external promotion to families with children.
Elsterwick	It is very visible from the attractively furnished Bistro bar.	No.
Eltham	No but share common entrance. Large sign pointing to gaming room. Open doorway to gaming room.	Yes. Far side of bistro. Open window to street.

Ferntree Gully	Although part of the lower floor area, it is separated by the bar service area.	In Martini's Bistro there are two coin operated machines; "Everyone Wins Jnr." and "Chocolate Factory". Sign for "Kids Eat Free" in the eating area. On tables were talkers for the auction which was extensively promoted in the pokie area and the entrance to the pokie area.
First & Last	Other than at entry, not visible.	Located at far side of the bistro. It is visible from the Sydney Road exterior in the form of a tepee
Footscray FC	Not so long as doors closed. They were open during the inspection.	No. Located under stand of Whitten Oval. Set to be closed.
Fountaingate	Clear glass door separates two areas. When automated door opens pokie noise is audible.	No. Kids Eat Free signs. This venue is located in a shopping mall.
Gateway	Limited. Visible on entry.	Yes. Win and Grin and Chocolate Factory coin operated games of chance are installed just outside of play area.
Glengala	There is a glass divider separating the bistro from the gaming room. The bottom 1.5 metres is opaque then it is clear above. Between the two rooms is a large opening allowing the noise of the pokies to be audible.	Located in entrance to gaming room. There is clear glass dividers all the way through to the gaming area. The gaming area is visible through these clear glass walls. There is a warning that the room is not air conditioned and that adults should supervise children. This room is on the outside of the building and exposed to direct sun through its north west orientation. Sign posted - "Cinder the Clown every Saturday night. 6:30 PM. Plus Kids Eat Free - conditions apply" At night pokies easily visible from play area.
The International	Visible but not audible.	Mondays - Kids Eat Free in the Bistro.
Hallam	There was a glass and wood wall with doors that were closed. Wooden blinds were on the windows were angled so that there was complete vision between the areas.	None. Offers Kids Menu.

Highpoint aka Pokies Plus	There is a lounge area adjoining the gaming room. No walls divide the two areas.	Observed a child likely to be under 10 years old playing a video game in the TAB (a part of the tavern) near the entrance to the gaming room. This venue is located in a shopping mall.
Hogan's	To enter the bistro area from the rear car park requires families to pass by the pokies room. Entry from the High Street side of the hotel enters directly into the bar / bistro area. There is no visibility or pokies noise in the bistro. Pokies room is located in the rear of the venue.	Yes.
Keysborough	There is a 1.5 metre wall that divides the pokies from the bistro and then a clear glass wall with large openings (no doors) at either end. This arrangement allows for both visual and audible presence for bistro diners to the pokies.	Can see pokie lights through the clear glass walls of the play area. Poster promoting Friday Night face painting from 6:30. "A Winner Every Time" game is located in the play area.
Lyndhurst	Not really a bistro. More like a bar lounge	No
Mac's (Melton)	There is a shared front entrance. The back of the bistro has an open entrance (no doorway) to the gaming area. While the restaurant seating is somewhat buffered by an open lounge space, the pokie noises would be audible.	It's called "Jacqueline's Corner." Chocoholic coin operated game of chance located inside the play area. From kid's area doorway, the gaming room lights would be visible through the bistro and hotel entranceway as all walls are glass; particularly, when automated doors to the gaming room open.
Manhattan	No visibility other than when entering.	Signs were placed to promote bringing children into the venue for discounted food. Monday night is family night. 5 for \$50. Offer is for either 1 adult and 4 kids or 2 adults and 3 kids. A poster in the pokies room promoted this offer. In the entrance to the bistro, children's meals were \$12 while adults meals were either \$20 or \$22. Child play area recently installed.
Manningham	Other than when entering through main entrance. Eating area is down a corridor to the left.	None.

Matthew Flinders	Across the common entrance. Would be audible when automated doors open.	Gaming room visible from kids' area across the bobby's bistro through clear glass walls.
Meadow Inn	There is a lounge area which buffers visibility and sound. However, there are clear glass dividers to the gaming room. There is a door that can close (it was opened) to reduce sound.	Children playing in this area would be able to see the pokies room not only when they are eating but also when playing in this area. The bistro entry passes by the pokies room
Milanos	Partition with open entrances either side. As if it were one large room.	Kids menu available
Mitcham	Two entrances on either side of the pokies room bar allow pokies to be both seen and heard.	Kids menu available
Monash	Yes but around corner	Yes. Walk through main entrance then through bistro.
Moreland	Yes. Clear glass wall. So long as door closed; no noise.	Yes. Located at Sydney Road end of bistro. This area is visible to the pokies room at night. Kids presence is promoted on the three exterior walls of the venue. "Kids Movie Nights" Tuesday and Wednesday. Friday nights "Kids Eat Free". "Kids Parties A Specialty".
Morwell	Open entrance. No closed door. Pokies both audible and visible in bistro area	Located at opposite end of bistro from the gaming room. Looks out onto beer garden area which, when viewed seem to be in disarray.
Mountain View	Although in the same space visibility is limited although pokies are clearly audible.	No. Offers child menu
Nu Hotel aka Players	No.	None.
Oakleigh Junction	No.	None.
Olinda Creek	Shared entrance otherwise limited.	None. Child menu
Palace	No	None
Pascoe Vale	They share one very large room divided by the bar in the middle. Shared entrance.	None. Free standing poster in car park entrance that "Kids Eat Free Friday and Saturday night"

Pier	Open entrance to a bar / eating area to the left upon entering from Nepean Highway.	None.
Plough	None.	None.
Powell	Limited although serviced from the same bar as the gaming room bar. Dining tables are in the sports bar.	None.
Preston	Yes. Room is wide open to the pokies area.	None.
Prince Mark	There is a wall with large openings between the areas.	No. Offers children's menu.
Racecourse	The two rooms are divided only by a 1.5 metre high divider with a light transparent material. There is a wide area with no door. Pokies noise is clearly audible.	None.
The Rex	The whole premises including the TAB is one large room with the bar dividing the two areas. Pokies audible throughout and visible in all parts except for the very front of the TAB.	None. 7 year old girl observed in TAB section of the premises which has a joint entrance with the pokies room.
Rifle Club	Does not have an eating area	None.
Rose Shamrock	Open bar and glass walls.	Gaming room visible for children in this area across the bistro.
Royal Exchange	There is a large open passageway. The separation is a clear glass wall that ascends to about 1 metre from the ceiling.	Kids eat Free Thursday 6PM. Play area is at opposite end of bistro from pokies. Small room. Looks out onto an area used for keg storage and a Dan Murphy's. 3 video games installed.
Royal (Essendon)	This venue has two side areas. One is an alcove to the pokies room. Some lounge chairs but no wall. Another is a small bar area with an open doorway to the pokies. Bistro is separate room and separate entrance.	None.
Royal (Ferntree Gully)	Visible on entry.	None.
Royal (Sunbury)	The bistro is next to the gaming room. There is a solid wall and a door. Limited visibility. Provided the door is closed, there will be limited pokie noise in the bistro.	None.

Sandbelt Hotel	The gaming room and bistro area are a part of one very large area. Sounds of pokies audible.	It is located at the back end of the bistro. Three video games installed. There is no warning on the child minding area that children should be supervised by adults. There was a sign about kids eating between 7 and 9 each Friday and Saturday night. The hotel's website promotes "a kids play area and face painting available every Friday and Saturday night, its great for the whole family. Kids parties also available. There were no signs in the car park on South Road warning about leaving children in cars. The hotel website promotes: "a kids play area and face painting available every Friday and Saturday night, its great for the whole family. Kids parties also available."
Sandown Park	Patrons will enter through a shared entrance. Gaming room to the right.	Kids eat free Wednesday. Located at far side of bistro area from gaming room. Visibility limited by wooden slats on a glass wall.
Sandringham	Clear glass doors separate the pokie area from the dining area. During inspection observed children sitting on the high bench tables near the bar looking directly into the pokies room.	This comprised 4 video games and a table near the hotel reception.
Sands	The area next to the gaming room is called Dunes and offers wood fired pizza. The entranceways between these rooms are wide open allowing the pokies to be both seen and heard. There are no doors.	Two areas. One is a room called 'Grommets'. It has a door. Inside there are video games and what looks like a party function room. When leaving Grommets, the open entrance to the gaming room is immediately in front. The other play area is outside. The entrance is adjacent to the gaming area. A claw machine called "Win and Grin" is installed in the entrance to the play area. There is a large outdoor undercover eating area next to the playground set. In this area is a large poster for "Texas Hold 'Em - Thursday Nights at 7PM".

Seaford	Bistro is on other side of entranceway in both front and rear entrances. Limited visual and pokie noise exposure.	Heavily promoted on premises exterior. Poster for movies with show times in play area. Showing Monsters Inc. Claw game installed with name "Win and Grin".
Shamrock	No sounds either would be likely to be heard outside of the room. Separate entrance for TAB and pokies. Venue under construction.	None.
Shoppingtown	The gaming room is on the other side of the open bar from the bistro with full vision of pokie area	While child play area under construction, promotion to children persists. In its prior configuration, the lights of the gaming room were visible in the play area.
Skyways	When inspected in August 2008, the eating area was located across the hotel entry. It has no common walls with the gaming room. Visibility is limited.	None.
Sommerville	Visible through door with glass panel. Limited pokie noise when door closed.	Claw machine called "Everyone Wins" installed in kids area. The play area has a glass wall that provides visibility to part of the bistro. During inspection noted child playing video games in the room. Later two very young children entered the room. No adults were observed in the play area. Message on web site implies that the Somerville Hotel offers a child care facility allowing parents to eat or gamble on the pokies while their children are being minded.

Stamford	If door between "rest area" and pokies room were solid and not glass, then vision and sound would be excluded from this entrance to the bistro. KENO screen in bistro.	The play area is in a corner of the bistro. It has a glass wall. Because there is limited visibility of children in the play area; children are 'supervised' by means of 2 x video monitors in the eating area. Toy Soldier and Chocolate Factory coin operated games are installed in the play area. During inspection observed about 6 very small children playing. No parents were in the actual area. The camera angle is from near the ceiling. Children inside the play equipment are not visible.
Sylvania	None. Bistro is across a large entrance way from the gaming room	None.
Tudor Inn	With door closed there is no visibility to the bistro.	None.
Vale Hotel	The bistro shares an entrance with the gaming room. It is a wide open area. The bistro is a large room and parts of it will have limited visibility to the gaming area. There is also a raised lounge area next to the gaming room with open entrance-ways between them.	Yes. At other end of bistro facing Dandenong Road.
Vegas at Waverley Gardens	None. This venue is a pokie area, TAB and function room.	None
Victoria	The bistro shares an open bar with the gaming area. There is a wide entrance with no door. Can see pokies from the street through the clear glass bistro windows.	None.
Village Green	Limited from the Village Feast eating area. However there is a large circular dining area common to the gaming room and other bars. The gaming room is visible from this area	Yes. Promotes Kid's Clubs and Kids Parties.
Wantirna	Yes but limited due to a bar area in between.	None.
Waltzing Matilda	Yes	Yes

Werribee Plaza	The whole area is called Mosaic Cafe or Bar. It is in the same room yet divided with a glass wall with open areas. On the far side of the bar is an eating area with tables and chairs.	None.
Westend Plaza	A dining area was next to the pokies area divided by a wooden divider about 1.5 metres tall. Gaming area both visible and audible.	None.
Westmeadows	The bistro area and pokies room have a common entrance. The open passageway allows for pokie noise in the bistro area. The glow of lights from pokies visible above the glazed glass divider.	None.
Westside	There is a bar / eating area separated by glass partitions from the pokies.	Children's games are installed in the common entrance to the bistro and pokie room. While the play area is in another corner, there are three coin operated kid's games installed in the entrance together with free video games. These games are called "Win & Grin", "Bonus Play / Stacker", and "Toy Soldier". While this area is shielded in part by opaque glass, the pokies room is 6 paces away.
Wheelers Hill	The gaming area has it's own service. The main restaurants are on another floor.	Not observed.
York on Lilydale	Shared entrance between pokies room and bistro otherwise limited.	Not observed

Ballarat, Victoria - PokieWatch.org - Sights & Sounds Observations

All pokie pubs and clubs in Ballarat are covered in this schedule. The home page for the City of Ballarat is <http://www.pokiewatch.org/page/City+of+Ballarat>

The Blue Bell Hotel is included on this list and on the Victorian venues list. It is associated with Woolworths Limited. The information for the Red Lion Hotel was supplied by the venue itself. As a result, no suggestion can be made as to the ease of banning children completely from this venue.

Hotel/Club	Pokie sights and sounds in eating area	Child play area, video games, promotion
Ballarat Trotting Club	Open doorways and clear glass walls. When standing at buffet area of the bistro, customers will look directly into the pokies area. The bistro is located between the pokies and the TAB i.e. surrounded by gambling.	Located outside the building. Poster in entrance promoting the children's menu available. At time of inspection promoting Family Fun Zone Cup Night for 31 January. This comprised bits of A4 paper stuck on the glass wall of the pokie area.
Ballarat Golf Club	Small door with glass panel to bar area only.	None.
Ballarat Leagues Club	Vision through open door into pokie lounge area. Can see pokie promotions. The small lounge area buffers sound and most vision.	Called "Kids Korner". Glass walls. Can see directly into pokies room lounge area from play area through open glass doors. 4 video games. Large TV display on wall next to the glass children's play area.
Ballarat RSL	The pokies would be a presence in the RSL Hall. There is no bistro as such.	None.
Bunninyong Golf Club	The pokie area and the bistro/bar are in one room. There is a partition with clear glass upper portion that allows for the pokies to be visible throughout this area.	None. Upstairs function room has separate entrance.
Craig's Royal Hotel	Visible when entering restaurant. Sights and sounds if using bar area off reception area.	None.
George's	None.	None.

Golf House Hotel	The pokies area partition is a modern design with spaces. It is effectively in the same room. As a consequence, sights and sounds of pokies a presence throughout the bistro.	None.
Midland Golf Club	Small door with glass panel. Noise and vision would be limited if closed. The lounge area where snacks are served is open to the pokie sights and sounds. Function area has separate entrance.	None.
Minerdome	The bistro appears to be upstairs with a separate entrance. There is a link to the TAB through this entrance. The entry area was closed so no observation of signs on this entrance. There is another entrance to the bistro where vision of the pokies room may be present on the way upstairs to the bistro.	None. Next to basketball stadium.
North Ballarat Sports Club	Limited visibility while eating. Open entrances may allow for sound. Pass by entranceway to use the bistro.	None.
Red Lion	Limited vision through a doorway.	Yes.
Sebastopol BC	Pokies are both visible and audible due to open entrances between the two areas.	None observed.
Zagame's Ballarat Club Hotel	Clear glass wall with opaque application to part of it divides the pokies and the eating. TAB noise audible in bistro area. Partition to TAB has wide open area.	Yes. Large and heavily promoted both in exterior advertising and on web site.

South Australia - PokieWatch.org - Sights & Sounds Observations

The home page for all South Australian observations is <http://www.pokiewatch.org/page/South+Australia>.

Hotel	Pokie sights and sounds in eating area	Child play area, video games, promotion
Aberfoyle Hub Tavern	Only a partition separates the areas which is one large room. If entering through the main entrance must pass by the pokies room. The same bar services both areas.	Bonus Spin game installed.
Bridgeport Hotel	If doors open then would be audible. Gaming room very much part of the room when entering from car park. Glass door with glazed sections that obscures some but not all pokie light vision.	Chocolate Factory and "Double Play" games installed near pokie room entrance in bistro. Double Play graphics were Disney-like child appeal cartoons. A small sign stating "Winner Every Time" was affixed to the machine.
Brighton Metro Hotel	Can see upon only entry but not while eating.	Yes. 3 video games in a room located at far corner of bistro. Also coin operated table console video games and Chocoholic. Sign that children to be supervised placed at the buffet.
Buckingham Arms Hotel	Although there is a stained glass partition between the lounge and the pokies room, it is translucent and there are wide open entrances allowing sound and vision to the lounge area. All dining room patrons pass through this area. The dining room has clear glass windows looking into the lounge area. The blinds in these windows were turned sideways to allow vision including the lights from the pokies room. The pokies area is part of a large room which includes the hotel reception, lounge, bar and TAB areas.	Removed Kids Eat Free sign on exterior of the venue. Black board menu at dining room entrance did not promote Kids Eat Free. There was a display on the Club Win terminal in the pokie room entrance for Kids Eat Free. 2 x playstation set up. Coin operated table video game. Both placed right next to the pokie area. All sounds heard. Observed 2 children playing these machines. No parent supervision signs at this play area.
Hotel Enfield	Wide open entrance to the bar. Vision through clear glass door to bistro.	Chocolate factory coin operated machine in bar area.
Eureka Tavern	Pokies visible. Sounds limited so long as door is closed.	No play area. Child's menu offered.

<p>Esplanade Hotel</p>	<p>If entering the venue from the Esplanade, people will walk directly towards the pokie room with a neon sign "Pokies" above the entrance. There are two eating areas. As one enters the venue there is the eating area that houses the kids play area. This is the same room accessed through the car park. Eating here is from a serve yourself buffet. There are KENO monitors in the buffet eating area. There is a large Gaming Room sign above the glass doors of the pokie room. The other area is integrated with a bar and is accessed through an entrance in Jetty Road. Pokie room has open entranceway to the bar of the Jetty Rd eating area. This eating area is a restaurant. This eating area is located down a short but open stairway from the pokie room which shields the sights and sounds of the pokie room until a customers ascends the stairway to a bar area. This bar area is open to the pokies area. There is a KENO monitor in this area. The transitional space between the bar and the pokies room is used for KENO and Lotteries.</p>	<p>Located 16 paces from the pokie room door. Can look into pokie room from play area. Sun Queen pokie poster and pokie lights visible. Chocolate Factory coin operated game. Noorgen Vaas ice cream bar is located next to pokie room entrance.</p>
------------------------	--	--

Exeter Hotel	Vision limited as most of bistro around the corner. Can hear sounds. Door to pokie room left open.	Located next to the Beer Garden. It is visible when entering from the car park. If not for wood slat wall, children would look straight across to pokie room entrance. Play area not visible to most of bistro seating. Bistro Ice Cream dispenser and coin operated game of chance 'Chocolate factory' is placed near pokie room entrance and within eye sight of play area. Kids play are sign on exterior of venue. Observed school children walking by venue during the inspection. Also noted that play area is next to the BWS storage for beer. Cars using the BWS drive-thru drive by the play area. Coin operated games on other side of bistro next to street window. Two young children were observed playing with these games. Bonus Spin (with Madagascar 2 poster as its visual backdrop), Family Guy pinball and Big Buck Safari games installed.
Federal Hotel	Open hallway. Can see side of one pokie. When dining room full there would be limited noise. Note pokie room street entrance has no sign.	Sign promoting Family Fun Day in a view that seems to cater little to families
Findon Hotel	None other than at shared main entrance.	None
Finsbury Hotel	Wide open entrance between eating area and pokie area. The TAB in the eating area has no dividers whatsoever. Chocolate Factory coin operated machine installed.	None
Gepps Cross Hotel	In sports bar. Hotel in separate building.	None
Grand Junction Tavern	An opaque glass wall with clear sections divides the pokies area from the other bar.	Web site promotes; "Kids are also well catered for, with a designated menu for 2 to 12 year olds". No children's play area. Eating area would be in the Sports/TAB bar.

Halfway Hotel Beverley	Eating and pokies in one large room with low opaque glass divider.	Video games located near ATM. For most of the eating area this is at the pokie area end of the room. Stacker and Bonus Spin coin operated games installed. Having regard to the venue's web site statement about a kids play area - this could be it.
Hampstead Hotel	Yes. All open entrances. A4 poster on bar in bistro promoting 'Come and Play - Try your luck in our gaming room'	In bistro two coin-operated machines were installed. In this area there was a sign "Ensure Children Are Appropriately Supervised. Coin operated claw machine installed called "Win Everytime".
Hendon Hotel	Wide open entrance to the pokies area. Most tables set around the corner from the pokies.	Bonus Spin coin operated machine and Simpsons pinball installed in eating area next to the pokies area. This is the area where the high chair for infants is stored. A Madagascar 2 poster is the visible back of he Bonus Spin game.
Henley Beach Hotel	Yes through the open sides of the large partition. KENO screen in bistro.	None.
The Highbury Taverner	Separate entrance. Neon light sign "Gaming" over entrance to pokies room is visible in the bistro.	Offers a Kids Menu for children under 12 years.
The Links Taverner	Sign in bistro indicates "Through to Pokes Room". Pokies audible from the dining room, but not visible. Solid wooden door and wall between the two. KENO screens in bistro.	Located diagonally across from the wood and glass doors to the pokie room. Pokie vision available through the glass panes. Chocolate Factory and Stacker games in bistro entrance.
New Reservoir Hotel	In lounge area only.	None.
New York Bar & Grill	If door is open then will experience both sound and vision. Doors are stained glass and blinking pokie lights are visible even when closed	Kid's menu on offer. This venue is located in a mall at the entrance to the mall cinema complex. As a result there is a constant traffic of children by the venue. It is opposite the Hungry Jack's. Big Buck Safari video game is located immediately outside pokie room door. Stacker and Chocolate Factory games are located in other part of eating area.
Norwood Hotel	No eating area. Pokie lights visible on The Parade	None.

Paradise Hotel	Wide open doors. Glass wall. Paradise Hotel sign over pokies entrance. Also a neon sign "Pokies" visible throughout bistro. No sign observed prohibiting minors in the main bistro area.	Observed Stacker and Toy Story coin operated games of chance machine installed in playground area on 1 st visit. Observed Light House, Toy Story and old table video games in children's play area on 2 nd visit. Playground equipment is located out side. From Lower East Road entrance is shared between the Pokie room and the bistro.
Payenham Tavern	Glazed word "Pokies" on glass door to bistro. Open door. No warnings whatsoever on door between bistro and pokies room	No kids area but coin operated games in TAB area visible in Bistro. Observed unaccompanied child walking in bistro next to pokies room. Observed him alone playing his own portable video game for some time in the TAB although he was later joined by an adult.
Playford Tavern	Vision and sound all the way to the video game play area. Apart for the opaque glass divider pokies and dining in one room.	Play area offers coin-operated games. Bonus Spin showing Homer Simpson picture. Mutant Turtles. Chocolate Factory. Old style table video game. 6 x high chairs set up in bistro area visible upon car park entry.
Ramsgate Hotel	Visible to dining room through clear glass door. Limited noise if doors closed and dining room is busy.	Has children's menu for under 12 y.o.
The Rose & Crown	Wide open entrance. Glass partition only. It is as if both areas were one room.	Pokies area visible from play area. Extensive child orientated promotion on venue exterior
Royal Oak	Main eating area in separate building.	Children prohibited from entry.
Salisbury Hotel	Open entranceway. No floor to ceiling wall.	Chocolate Factory machine.
Seacliff Beach Hotel	Observed blinking pokie lights through gaps in glazed glass windows dividing the pokie room from the dining area. Large red neon sign above these doors. Doors had been left slightly ajar so patrons get a clear view of the pokies. The words "Gaming Lounge" is glazed on the doors to the pokie room from both the TAB and the dining area.	Video game in corner of bistro next to the entrance to the pokies room that was observed during the first visit had been removed.
Slug 'n' Lettuce	No. Separate entrance.	None
Stockade	TAB / eating area and the pokies room is one large	None

Tavern	area partially divided by a smoking area.	
Victoria Hotel	Pokie lights visible through gaps in window glazing on the glass door dividing the bistro and the pokies room.	Kid's menu offered.
Waterloo Station Hotel	The corner of the pokie room near the cigarette machine is clear glass so that pokie vision is available to portion of the bistro. From the bistro it would be part of the back wall of the bar. When entering the venue, it is a shared entrance between the pokies and the bistro. Pokies visible through gaps in the glazing on the glass pokie room entry door.	Children 4 and under eat free. Children under 14 eat for \$9.95. Web site promotes the venue as being "family friendly".
Western Tavern	Audible as long as glass folding doors are open. Always can see. Sign in bistro for children to be supervised. Eating area was very large. Noted that buffet equipment was stored behind a curtain. Is it waiting to be installed?	None.

Queensland - PokieWatch.org - Sights & Sounds Observations

Full Inspection notes are found on www.PokieWatch.org. The home page for Queensland observations is <http://www.pokiewatch.org/page/Queensland>

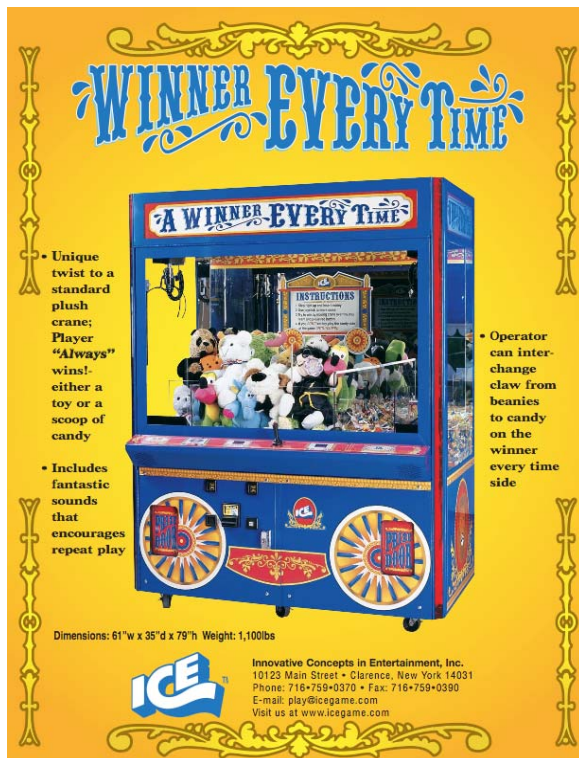
Hotel	Pokies sights and sounds in eating area	Child play area, video games, promotion
Albany Creek	Vision to the left upon entry through open doorway.	Yes.
Beenleigh	Open entrance to the pokies room Added visual attraction are bags of gold with green dollar signs in a brightly lit showcase.	Semi-outside behind huge banner for pokies room trading hours. Win 'n Grin machine placed so vision of pokies room is to the right while playing. Win 'n Grin coin operated game of chance is 14 paces from pokie room entrance.
Bonny View	Cannot see but can hear as no door on passage between the two areas.	Yes. Substandard construction under a verandah near car park.
Brighton	Sound and vision in both the bar next to the pokies room and The Grill.	No but Chocolate factory coin operated game located near corridor to the pokies room. Toy Story game next to the ATM.
Brook	Pokies room partition does not extend to the ceiling. Plus open entrance allowing both sight and sound	No.
Capalaba	Yes, in the lounge area next to pokies room. Bistro is further away although entrance is wide open to sound and vision. Ca	No.
Carindale	Can hear in hotel reception / function room / lounge bar next to Bistro. Note door directly into bistro as pictured with Win Win Win written on it in gold.	Website mentions that the Westfield centre "offers Child Minding for shoppers".
Centenary	There is a separate side entrance to the bistro by the playground. If entering through the main entrance all must pass by the pokies room	Located outside the pokie room smoking area. Sign posted "Children must be supervised at all times"
Cleveland Sands	Not in bistro area. Smoking area for the pokies room is outside. This area is directly opposite the local library. Passing pedestrians can look directly into the pokies room after exiting the library.	None.

Club (Waterford)	Total width of the pokie area visible in bistro as if patrons were in the same room. 2 x KENO screens in bistro. Every table in Lounge had KENO table talkers.	Venue has indoor and outdoor play areas. Outdoor play area is located next to rubbish storage. "Become A Member to Win" poster at entrance to the indoor playroom. Kids Eat Free A4 poster in pokies room entrance.
Edinburgh Castle	Shared entrance. Pokies are to the right on entry.	None.
Everton Park	Open entry to the pokies room allowing sounds but no vision. Neon gaming sign that above the pokie room entrance facing the bistro. KENO poster on the wall. Can look into the pokies area upon entering the hotel. 2 x Cash magnet posters in the bistro promoting pokies and cash jackpots on pokies.	In 2006 it was reported that \$500,000 had been spent on the play area at this venue. A huge area that stretches along the whole back side of the bistro. "Grin and Win" coin operated game located in joint pokies/bistro entrance.
Ferny Grove	The pokies room and bistro are one large room divided by the bar.	Yes. Limited vision in the bistro through a glass door. 2 x coin operated vending machines by play room entrance. "Fantasy World".
Fitzy's Loganholme	Shared entrance. Pokies room is wide open to the left upon entry. Sight are the lights above the partitions which do not extend to the ceiling. Can hear the sound of the pokies as a result.	It is a glassed area near the pokies room. While no visibility of the pokies while inside play area, pokies are a presence upon entrance and exit.
Fitzy's Waterford	Not recorded.	Website promotes "a fantastic kid's playroom". Also a Kid's Menu for \$7.95.
New Inala	Wide open doorway to the bistro allowing sight and sound.	Comprises a bean bag and a TV in the corner of the bistro.
Indooroopilly	Pokies room is on seperate floor from nightclub and down a hallway from the bistro	None.
Jindalee	The entrance door from the TAB is solidly opaque blocking vision. The door in the entrance to the eating area has clear glass sections allowing vision.	Located outside and partially covered. Has vision across eating area to pokies room.

Kenmore	There is a neon sign over the pokie room entrance in the bistro that says "Emerald Mine Gaming Lounge". This entrance is surrounded by a faux mining decoration similar to what children might see at an amusement park ride. In the eating area itself there were 2 x KENO displays plus a large sign at a KENO counter.	Promoted but not inspected.
Koala	Room with the bistro is wide open to the pokies area not the room with the ATM which is called "Settlers". Pokies room is in the middle of two areas. One has a door which was open - glass - the other, the bistro, has no door.	None observed.
Lord Stanley	None other than at entrance.	None.
Mansfield	Wide open entrance	Yes.
Newnham	Pokies room well away from bistro. No sound but clear glass wall to the sports bar.	Yes.
Nudgee Beach	The partition has vision areas (like a weave) which allows vision. Pokies area audible as bistro is virtually the same room.	Yes.
Oxley	The opaque glass partitions obscure vision for both visitors to the bistro and the cashiers. This impedes vision for supervision of actual gambling in the pokies room, e.g. one person playing two machines simultaneously. Pokies have presence when standing at food service area.	Video games only. No play equipment. Food service area nearby.
TCB Oxley	Partition does not extend to the roof. Pokie room is open to the TAB area. The whole venue is one large room. Neon Pokies sign over entrance to the pokies room visible in bistro.	Video games and Chocolate claw coin operated machine set up on wall in bistro opposite the pokies room. Sounds and vision of pokies particularly when automated doors open. Kid's Eat Free poster in entrance.
Prince of Wales	Open entranceway.	No.

Regatta	There is a metal sign (subtle) that points to the pokie room amongst other signs near the bistro area. There is another sign at the top of the stairs.	No.
Royal English	Dining on another level.	None.
Royal Exchange	Self contained area. Not an easy entrance to balance of the hotel	None.
Salisbury	Large sign over entrance to pokies room promotes Goldstrike Pokies. No wall. Wide open vision.	Not observed.
Taigum	Sign above door which was open in Sports Bar. Glazed glass door to bistro when opened allows sound and vision. No large signs on entry to pokie room from bistro. An A4 sign was placed next to the KENO display prohibiting children from entry.	2 areas. 1 in the beer garden as pictured. The other was inside the bistro looking out onto the generator yard. Video games installed including a coin operated Big Shot mini Pinball.
The Gap	No sounds. Clear glass door allows vision into TAB area, with no visibility of betting facilities.	Two play areas including an "Unsupervised Childrens Playground"

1.3 Coin Operated games



Many pokie venues install coin-operated games. In some instances, these games are promoted as a feature of the venue to encourage attendance by families with children.

Typically these games are described as “crane” games:

Set out below are particulars of some games seen operating at pokie venues. The descriptions are taken from the vendor’s own web pages.

This is not an exhaustive list. Other games observed are Toy Soldier and Chocoholic

Bonus Spin

“Bonus Spin (Formerly Free Spin) 41” Claw Crane Machine - Free Spin is a crane with a twist - Play the standard claw game on the left side. If you win a prize,

the wheel will spin and you can hit the button to stop the wheel on a "winner" space to win one of the big prizes. The Bonus Spin crane generates more revenue for operators because customers perceive that they are getting more than just one chance to win a prize, and the bonus prizes they may win are of even higher value!” This description was sourced from a distributor of this machine

www.bmigaming.com

Chocolate Factory

“The game play is very simple. The customer directs the claw over a chosen chocolate bar and drops the claw by pressing the button on top of the joystick. It is here the electronics take over, as the claw lowers and attempts to grab a chocolate bar (made easier by having rubber tips on the claws). The gantry then returns the result to locate over the mirror slide and drops its bounty onto the surface. The product, if originally picked up and held, will then slide down to the pusher system and falls mostly on the tail end of the product on the slide deck. It may then push the other products forward with the chance that one or more products at the very end of the slide deck, will topple over the end and into the prize box for collection of the customer.”

<http://www.wgagames.com.au/cf.html>

Win ‘n’ Grin

“Win n Grin Plush toy crane has taken cranes to a new level. The team has designed the game with the operator in mind. Electronic adjustments means that you no longer have to do contortions to access and change dip switch settings, and with the

'intelligent monitoring system' that keeps a close check on toys paid out, you can rest at ease that the WGA crane self adjusts, if you require, to maximize your returns and keep your percentages on an even keel.

With graphic display and Australian designed sound effects, with no distortion, you can easily place this crane game on site alone, or with a WGA chocolate machine, and be sure of good returns with very few service calls. This game comes standard with two electronic coin mechanisms, a facility for a note acceptor and secure cashbox."

<http://www.wgagames.com.au/wg-plush.html>

A Winner Every Time

"Players play for large sized plush on one side and then watch the claw "automatically" move to the "winner" every time side if they fail to snag a good prize. Claw can be interchanged to accept candy or small beanie plush. Winner Every Time doesn't let anyone walk away empty handed! Repeat play is encouraged by the fantastic sounds and very attractive cabinet a guaranteed winner!"

Made by Innovative Concepts in Entertainment Inc.

<http://www.icegame.com/GameDetail.aspx?ProductID=40>



Stacker

"Stacker's concept is simple, players have to stack moving blocks 11 levels high to reach the minor Prize level. Players can then choose to collect a cheap Prize or risk it all and play on for something that's worth about 100 times the price per play - So guess what players will do? This is a brilliant game concept, LAI understands player's emotions and exploits

their greed that makes them try and try again."

http://www.laigames.com/comic_panels_hm/page00.htm

These coin operated games emulate the emotions of gambling on pokies and are targeted to children. Some, unlike pokies, reward "A Winner Every Time" while another "understands player's emotions and exploits their greed that makes them try and try again".

Based upon the stated intentions of the manufacturers of these machines, it is submitted that their placement in pokie pubs by Woolworths, Coles and other venue operators demonstrates their lack of responsibility for the children they are enticing into their venues.

These machines are typically placed so that they are visible to children in the eating area. In some cases, they are placed inside the child play area. In one instance, such machines (Westside Hotel, Laverton, Victoria) were placed no farther than 6 paces from the pokie room itself.

1.4 Inconsistent Standards

Many venues prohibit children from attending musical or theatrical events because of the danger of exposing them to experiences that could cause harm even if accompanied by an adult.

This inconsistency was recently exposed at the Woolworths associated Ferntree Gully Hotel. The hotel's rules prohibit children from attending a concert by Darryl Braithwaite of the former teen band Sherbet. At the same time this venue encourages parents to bring their children inside to have their face painted in the dining area where they would be exposed to both the sights and sounds of the pokies.

This action implies that exposure to Darryl Braithwaite is exposure to a harmful adult only form of entertainment. At the same time, it implies that exposure to pokie gambling is not exposure to a harmful adult form of entertainment. This is irresponsible behaviour on the part of Woolworths.

Pokie gambling is an adult form of entertainment that is licensed by the government recognised to be harmful and, if not licensed would otherwise be illegal.

1.5 The Eating Room Environment

- In some instances, the pokies themselves are shielded from vision in the eating area. Venue operators have placed large signs or displays around the entrance to the pokie room to attract attention. Without being exhaustive, examples include Esplanade Hotel in Brighton, South Australia and Beenleigh Tavern in Logan City, Queensland.
- Eating areas are integrated with TAB betting facilities. This applies in the Finsbury Hotel in Woodville, South Australia.
- KENO or other lottery based video displays are affixed to walls of a significant number of Woolworths associated venues in all states visited.
- KENO bets can be made; e.g. the eating room of the Kenmore Tavern, Queensland.

All this activity exposes children to adult forms of entertainment.

1.6 The Moral Argument

There is precedent for the consideration of moral or religious grounds.

The Full Court of the Supreme Court of Victoria in the decision of Macedon Ranges Shire Council v. Romsey Hotel Pty Ltd should be considered. This matter concerned an application for approval of pokie licenses and required interpretation of factors set out in the Victorian Gambling Regulation Act. Put over-simplistically, the Court was considering the process to make a finding whether the introduction of pokies would result in a net benefit or not.

Paragraph 55 of the decision is a key paragraph and is reproduced below:

"The fact that the GR Act allows gaming to occur in approved premises does not mean that any Victorian community is obliged to accept gaming machines. Nor do the provisions in any way prevent a community (or

particular members of it) from voicing 'in principle' objections to the introduction of EGMs. On the contrary, as we have noted, community input is to be sought 'to the widest extent possible'."

The court goes on to state "there is no basis for treating as irrelevant for this purpose objection based upon moral or religious grounds".

The Supreme Court took an expansive view of what matters should be considered. Past judgements confined consideration of how the approval of pokies might impact on problem gambling. The Romsey court says this was wrong.

"With respect, the focus here is much too narrow. The impact on community members who do not gamble, and do not wish to gamble, is equally relevant. As the GR Act makes clear, Parliament was concerned that the views of the community at large should be heard. The Commission has, as one of its statutory functions, to advise the Minister 'on community concerns about the economic and social impact of gambling on the well-being of the community.'"

While the Productivity Commission is not charged with statutory interpretation, it has been asked to consider the social impacts of the gambling industries. Such consideration should not preclude considerations of moral or religious grounds.

To this end, the views of Rev Tim Costello should be given some weight:

"The childhood years are precious. There is no need for premature introduction to adult entertainment. I am deeply concerned about those pokie operators who aggressively market free food and movies to families who live in our disadvantaged areas with the intent of luring them into their pokie venues. This must stop."

As adults, Australians will have most of their lives to indulge themselves in adult entertainment. Adults can freely choose from entertainment permitted by the Government; children are incapable of making such choices. These adult activities include: drinking alcohol, prostitution, betting, and smoking.

It is wrong for the relationship between and parent and child to be exploited. In relatively disadvantaged areas like Elizabeth in South Australia, Logan City in Queensland and Chadstone in Victoria; families have limited choices themselves. Offers of offers of free food, playrooms and movies for kids are attractive. These are areas with high pokie losses.

The decision by any venue operator to enter the adult orientated business of pokie gambling is voluntary. While this submission applauds the Commissions considerations in section 16.6 of the 1999 report; continuation of a government granted license allowing participation in the pokie business itself is sufficient incentive. Along with the benefits of profiting from the pokie gambling business is a corresponding duty to be responsible to impede children's exposure to that adult entertainment rather than marketing in a way that attracts them to it.

1.7 Existing Regulations

New South Wales

NSW regulations began to address the issue in their Gaming Machines Regulation 2002. These regulations were recently amended. Clause 9 provides that “the gaming room must be physically separated from the general bar area by a permanent floor to ceiling wall with at least the bottom half of such wall being constructed of opaque material, and any building approval for any work that is required to be done must be obtained before the approved gaming machines may be kept in the hotel”.

These regulations make prescriptions about access to public bar areas. They also prohibit visibility to public areas. They are silent on the issue of visibility to eating areas.

South Australia

Clause 4A of the South Australian Responsible Gambling Code of Practice provides:

4A. Screening the sights and sounds of gambling

(1) The gambling provider will ensure that, to the greatest extent practicable, it is not possible to see into a gambling area from within other parts of the premises or from outside the premises.

(2) The gambling provider will ensure that, to the greatest extent practicable, sounds associated with gambling are not audible in parts of the premises other than gambling areas or in any area outside the premises.

http://www.olgc.sa.gov.au/gaming/responsible_gambling/code_of_practice/Responsible_Gambling_Code_of_Practice_1_December_2008.pdf



To the right is a picture taken from the web site of the Seacliff Beach hotel. It shows the dining area, the ATM, the glass doors to the pokie area and a neon sign promoting “Gaming Room” above the entry.

Please note that a venue operator does not need to comply with Clause 4A if it has entered into an approved intervention agency agreement as defined in the regulations. There appears

to be no public access or consultative process with respect to such agreements.

Queensland

The web page title is “Is your local venue committed to responsible gambling?”
<http://www.olgr.qld.gov.au/responsibleGambling/communityInfo/resVenues/index.shtml>

Reproduced below is the paragraph about venue environment:

“Minors are prohibited from gambling and are not permitted to enter designated gambling areas. Venue staff should not serve drinks to patrons playing gaming machines. Customers who are unduly intoxicated should not

be allowed to continue gambling. Venues should display clocks in the gaming areas so customers are aware of the passage of time. Venues should also promote other activities which may be taking place e.g. entertainment, trivia nights, meal specials. You might hear announcements about other activities or letting you know the time. Tea and coffee facilities should be located away from the gaming machines.”

The performance of Queensland venues against this standard is detailed in section 2 of this submission. There is no regulation restricting pokie sights or sounds.

The Queensland Responsible Gambling Code of Practice provides:

4.5 Where gambling providers offer adjunct child care, the facilities must provide safe and suitable standards of care in accordance with relevant child care legislation.

<http://www.olgr.qld.gov.au/resources/responsibleGamblingDocuments/responsibleGamblingCodeOfPractice.pdf>

Reference to this legislation can be found on the Queensland Kidsafe website at <http://www.kidsafeqld.com.au/index.php?page=viewStoryHtml&title=Legals> PokieWatch.org has not conducted an audit of existing pokie pub play areas to ascertain whether they meet applicable standards.

Victoria

Division 2 of the Gambling Regulation Regulations prescribe lighting standards for pokie areas and restrict removal or obscuring of existing windows.

There does not appear to be any regulation restricting pokie sights or sounds.

Northern Territory

The Territory publishes a Code of Practice for Responsible Gambling. This code can be downloaded here:

http://www.nt.gov.au/justice/licenreg/documents/gaming/responsible_code_of_practice.pdf

Clause 5.3 of this code provides as follows:

“**Child Care Facilities.** Where gambling providers offer child care facilities, these facilities must recognise all child care regulations and patrons must be encouraged to check their child a minimum of once an hour and adhere to a maximum of a 3 hour stay permitted at the child care facility within any 24 hour period.”

It is submitted that leaving one’s children unattended in a play area for 3 hours while only checking upon them once an hour is unacceptable by any standard.

Solution

A uniform national code should be imposed federally or adopted by state legislatures that provides venue operators the choice of either barring children from pokie pubs or clubs or, alternatively, imposes a condition of license that restricts minors from exposure to pokie sights and sounds and the promotion of other forms of gambling in pokie pubs and clubs.

1.8 Other Observations about Children and Pokies

Childcare is inconsistent with gambling

A December 2008 decision of the Victorian Commission of Gambling Regulation received evidence of a letter from the former officer of the then Prime Minister John Howard's office. The letter was concerned with the Federal subsidy for a child care centre near the Whitten Oval where the Footscray Football Club operates a pokie gambling facility.

“the provision of childcare – which was a very significant feature of the project from the Federal Government's perspective – was thought to be fundamentally inconsistent with running a gaming and licensing venue on the very same site.”

This paragraph is found on page 29 of this decision. It can be downloaded at [http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/881663BD19916CECCA257529000AA7BB/\\$File/Decision%20-%20Footscray%20Football%20Club%20Ltd%20-%20Club%20Edgewater%20-%2024%20Dec%202008.pdf](http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/881663BD19916CECCA257529000AA7BB/$File/Decision%20-%20Footscray%20Football%20Club%20Ltd%20-%20Club%20Edgewater%20-%2024%20Dec%202008.pdf)

While on first glance the location of a formal Commonwealth subsidised child care facility may seem fundamentally different than the provision of a children's play area at a pokie pub, they share an important element. That element is the exposure to the conduct of pokie gambling and its consequence. It is what Dr Livingstone refers to as the 'normalisation' of potentially dangerous activity.

Press and notice board reaction

This issue of children in pokie clubs was covered in the Brisbane Courier Mail on 24 January 2009. <http://www.news.com.au/couriermail/story/0,23739,24956735-23272,00.html>. It is suggested that the Commission read through the 46 comments posted on this story. These comments provide a helpful sample of community expectations on the matter.

Inexpensive Remedial Action

The tables in this section colour some hotel names in blue. As mentioned above, this designation indicates that the venue is adult orientated. As a result, there would be likely to be little economic detriment to the operator from the exclusion of children from that venue. Little investment has been made these venues in either playground equipment - or -opening up the pokie area to exposure to other parts of the venue where children might be present.

In these instances, exclusion of children would involve no more than the painting of a sign on the door prohibiting minors and the enforcement of that exclusion. Such exclusion is already in place in parts of some Queensland venues (Club Hotel, Waterford, Queensland) and after certain hours in South Australia.

Issue 2

The Pokie Room Environment The Need for Prescriptive Regulation

The evidence gathered and published on PokieWatch.org measures actual performance of a number of pokie room practices. Many of these practices were suggested in Section 16 of the 1999 Productivity Commission Report.

This presentation makes no submissions on whether a particular practice is or is not effective in preventing problem gambling. Instead, observations are made whether these practices are in place or not.

The following practices are examined:

1. Awareness of the potential to Self Exclude
2. Visibility of messages about possible damaging behaviour
3. Practices that prolong pokie gambling
4. Marketing displays in pokie rooms (posters, lights and floor promotions)
5. Cards and posters in toilets providing information about gambling help
6. Placement of ATMs

It is submitted that stakeholders will do no more than what is specifically prescribed. Where practices are assumed voluntarily, they are inconsistently performed. Because an organization effectively implements compliance in one jurisdiction does not mean that the practice will be carried out in another jurisdiction. In some instances, the opposite may be the case.

Whatever practices the Commission recommends must be enforced by comprehensively worded prescriptive regulation otherwise they will fail to be effectively implemented.

2.1 Awareness of the potential to Self Exclude

On page 16.65 of the 1999 Report the Commission considered:

“there are grounds for mandatory signs in any gambling venue that indicate that any patron may self-exclude, and accompanying pamphlets that explain how self-exclusion works.”

While this recommendation was recently adopted in NSW, the finding of PokieWatch.org inspections is that this suggestion of the Productivity Commission has been ignored.

South Australia Inquiry

While the notice itself does not conform with the Commission’s suggestion as set out above, many South Australian pokie pubs post a notice at the entryways of their pokies areas bearing the identities of the Australian Hotels Association (South Australia) and the Office of the Liquor and Gaming Commission. The text of these notices follows:

IMPORTANT NOTICE
GAMING BARRING ORDER

If you have been barred from the gaming areas of this hotel you must report to the Duty Gaming Manager immediately on arrival to enable your activity to be monitored to ensure compliance with the barring order.

We ask this in your best interest because if you breach your barring order you are liable to a fine of up to \$2500.

The colours used above replicate the colours on the notice.

It would seem that the posting of this notice is the result of Clause 9 (4) of the Responsible Gambling Codes of Practice reproduced on page 44 of the Barring Inquiry guide:

“(4) The gambling provider will ensure, to the extent reasonably possible, that self excluded customers are not allowed to enter, or remain in, gambling areas from which they have been excluded.”

This provision continues in the new gambling code of practice that came into force in December 2008.

It is appreciated that the posting of these notices may be only part of the execution of the responsibilities of a gambling provider. Notwithstanding, this notice was the most visible presence in South Australian pokie venues of the existence of a self-exclusion facility observed by PokieWatch.org.

Anglicare South Australia submission to a recent inquiry of the Independent Gaming Authority should be given weight because of their experience.

<http://www.iga.sa.gov.au/pubcons/iiba/Anglicare%20SA.pdf>

Two statements on page 2 of are significant:

“Anglicare’s central concern in the area of self barring is with their enforcement by venues. Our relationships with gaming venues have demonstrated that venues’ capacity and commitment to enforce barring and report barring breaches varies considerably.”

“A lack of public awareness of the scheme is currently a major barrier to participation and, we believe, contributes to delays in the recognition and addressing of problems with gambling until these experiences reach crisis point.”

Amongst other points, the following were the PokieWatch.org submissions made to that inquiry:

The notices that now appear in pokie pubs do not constitute effective promotion of self-barring as a means of dealing with a gambling problem. They call upon those who already participate to report to the duty manager. At best, to those unfamiliar with self-barring; they constitute notice that there is some procedure in place with a large financial penalty for non-compliance.

The existing notices say nothing about the benefits of self-barring nor any means of obtaining information about the programme.

Only two pokie pubs of the 35 South Australian pokie pubs visited displayed brochures relating to self-barring. Placement of a few brochure holders is not effective awareness. Overwhelmingly, the brochures actually displayed make no mention of self-barring as a solution to a gambling problem.

With respect to these notices and without making any judgement as to the effectiveness of the message on the notice: the following standards are reasonably possible, inexpensive to implement and should apply:

- Notices should be placed at every pokie area entrance so that a gambler entering the pokie area will clearly see the notice.
- Notices should be placed on their own and not in a group.
- Placement should be at adult eye level
- There should be at least 3 additional notices in each pokie area; the cashier, the coffee station, half of the change machines.

In this regard I refer again to Clause 9(4) of the Responsible Gambling Codes of Practice.

Consideration should be given to Internet distributed information whereby the venues, the regulatory body and the public can each view and report upon the gaming area environment. While the identities of self-barred individuals should be only selectively available, the promotion and operational details of each venue’s self-barring facility should be freely available.

The table set out below was prepared for the Independent Gaming Authority inquiry compiling evidence on actual posting self-barring notices. The placement in a pokie venue of an A4 sized piece of paper is a simple act. It’s execution is a worthwhile test of stakeholders ability to implement a relatively easy harm minimization procedure. The results are disappointing.

Hotel	1st Inspection Cycle: 11/08 to 01/09	2nd Inspection Cycle: 10 - 13 February 2009
Aberfoyle Hub Tavern	Large notice on entrance. Also on glass partition between the dining area and the pokies near the ATM. Also in the hallway back from the toilet	Sign glazed on glass in entrance. Divider from the ATM. Sign on toilet door leading back to pokie room.
Bridgeport Hotel		Notice on entrance from dining room. In entrance and made into a brass plaque. Also inside.
Brighton Metro Hotel		Not in either Charlies or Pokie room entrance. 1 located near change machine in back corner on sheet with two other notices. 1 located near change machine near coffee. Not on the What's On notice board which has other legal notices.
Buckingham Arms Hotel	Sign by cashier.	No barring sign in pokies room entrance from car park. Barring sign between lounge and pokies room.
Hotel Enfield	Signs at the entrance and next to the cashier	Poster from car park entrance is placed amongst 8 other notices including a poker promotion. Near cashier. On wall between bar and pokies room. Despite there being 3 other notices no poster when entering the pokies room from the eating area.
Eureka Tavern	Sign on glass in entrance.	Sign on glass in both entrances.
Esplanade Hotel	None seen.	Street and eating area entrance. No sign if entering from the Bar/Keno
Exeter Hotel	On glass entrance to pokies room.	On only entry door at eye level.
Federal Hotel		Poster in street entrance. No posters if entering from either the dining area or the car park.
Findon Hotel	One poster at eye level in entry. Other poster placed in dark corner and obscured by a plant.	Poster in car park entrance. Another poster by one of the change machines. No poster if entering from the main bistro/pokie entrance.
Finsbury Hotel	One poster near ATM.	By the cashier and the ATM. Nothing by car park entrance to the pokies room.
Gepps Cross Hotel	Game barring sign at side entrance and at cashier.	Posted at entrance but obscured by other signs on the door. Posted by cashier but below shelf. No sign if gambler enters from sports bar.

Grand Junction Tavern	One only - located 3 paces inside of the gaming room entry lobby No self-barring order sign near entry off front bar. *	2 signs. Sign on wooden pillar in the gaming room. Part of a 3 notice sign after the entrance but before the pokie area. No sign if entering the pokie area form the sports bar.
Halfway Hotel Beverley	Can only be seen when exiting the pokies room. It is around the corner from the entrance. No sign by cashier. There is a sign near the bar.	While there was a total of 13 sheets of paper notices posted in the car park pokies entrance, the notice relating to self barring was posted inside the entrance so visible only when exiting the venue. In the other entrance (the bistro entrance) was visible if entering from the bistro but not if entering from the car park. Neither is prominent inside the pokie area. There is a 3rd notice on the partition between the pokie and the eating area which is visible when near the cashier.
Hampstead Hotel	No sign in the joint lounge bar / pokies room entrance. Sign placed on a board in the transition between Lounge bar and pokies room amongst 7 other notices. Sign in side pokies entrance. Sign on another board amongst 5 other signs.	3 signs. 1 on pokies room entrance near construction. Faded. 1 on notice board between eating and pokie area - placed about knee high. 1 on notice board between pokie and bar areas. No notice on main venue entrance door from car park.
Hendon Hotel	None visible.	Sign to left of cashier in the corner. No sign if entering from the TAB. No sign in entrance or glass partition for the pokie area.
Henley Beach Hotel	No signs either by entrance or near cashier.	None on car park entrance. None observed anywhere.
The Highbury Taverner	Sign in pokie room exterior entrance.	2 posters. 1 in entrance placed on top of group of 6 notices. 1 in corner near change machine amongst 3 other posters.
The Links Taverner	At the entry to the gaming room from the dining room....also outside the gaming room entry from the front bar....not any signs at all inside or outside the beer garden entry . *	At both entrances. The entrance from the bistro displays the warning in a sign with three notices.
New Reservoir Hotel	No sign in main pokie room entrance. 2 x signs on pokie room wall and near cashier.	No sign in main pokie room entrance. 2 x signs on pillars on pokie room wall. 1 out to smoking area.

New York Bar & Grill	Small sign on side of the change machine.	No signs in either entrance.
Norwood Hotel	On the side of the rear entrance.	Notice in street entrance. The car park entrance has a divider so that gamblers enter either from the left or the right. If the gambler enters right then there is a notice. If the gambler enters left then there is no notice. In the center of the divider, there is a notice warning about theft. This notice is seen irrespective of whether entry to the pokies room is a right or a left turn.
Paradise Hotel	Sign by cashier.	None at bistro or the main street entrance. Sign by cashier.
Payenham Tavern	None seen - three doorways into the pokies area and none of them had self-barring orders signs near them. *	No notices observed.
Playford Tavern	Gaming room entrance off the dining room. None inside or outside street entrance. None between TAB bar and gaming room. *	Entrance. Barring brochure from casino at coffee station. Opaque glass partition separating eating and gaming. No sign if entering from bar adjacent to the TAB.
Ramsgate Tavern	No signs for self-barring in either street entrance.	4 entrances. No signs in any.
The Rose & Crown		Entrance from car park. Poster near coffee station. No poster in Phillip Highway entrance nor the entrance to the pokie area from the eating area.
Royal Oak Hotel	Poster in entrance and at cashier.	In entrance and at cashier.
Salisbury Hotel	None at either entrance. Pamphlets near cashier. Sign near coffee service area.	None at either entrance. Nothing on the partition from the bistro to the pokies area. There is a sign by the coffee station.
Seacliff Beach Hotel	No sign in entrance from dining area. The notice in the car park entrance is fixed to the back of the door. The door was left open (propped in position with a brick) so that the sign is not visible.	Notice on rear of car park door had been removed. Notice on partition near car park entrance. No notice on door if entering from TAB. 1 notice by cashier.
Slug 'n' Lettuce	Sign at entrance.	3 signs; at entrance, at cashier, at change machine near women's toilet.

Stockade Tavern	Notice located high on dark wall between TAB and pokies areas. Another sign located above the cashier.	3 signs. At entrance. Another sign high on wall above the cashier. One of the entrances between TAB/Eating area and pokies room had a sign. The entrance nearest the bar did not have a sign.
Victoria Hotel	In main door but no sign if entry from adjoining dining area. Also by cashier.	In main door and on the divider. No sign if entry from dining area. When entering from the bistro, sign off to the side prohibiting minors.
Waterloo Station Hotel	One on the wall to the right of the entry doors. *	One in the entrance. Another on the wall near the cigarette machine.
Western Tavern		1 at the entrance - up on wall behind a plant. No poster if entering from sports bar although there are signs regarding a code of practice and minors.

Full Inspection notes are found on www.PokieWatch.org. The home page for all South Australian observations is <http://www.pokiewatch.org/page/South+Australia>.

All inspections performed by Paul Bendat or Paul Bendat with Sue Pinkerton except where marked with an *. Sue Pinkerton performed the inspections marked with a *.

Victoria

Neither the pokie talker signs prescribed in regulation 17 of the gambling Regulations Regulations nor the posters prescribed in regulation 16 provide any information whatsoever with respect to self exclusion. The same applies to the player information brochure prescribed by regulation 18.

These publications can be accessed here:

[http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/9F15EBAB79B09296CA25743B0003697C/\\$File/Std_Minister2008Talkers.pdf](http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/9F15EBAB79B09296CA25743B0003697C/$File/Std_Minister2008Talkers.pdf)

[http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/2FA9D456A3F63F7DCA25743B00035287/\\$File/Std_Minister2008Posters.pdf](http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/2FA9D456A3F63F7DCA25743B00035287/$File/Std_Minister2008Posters.pdf)

[http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/AB678DAA4AB3B1AECA25743B00032B65/\\$File/Std_Minister2008Broc.pdf](http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/AB678DAA4AB3B1AECA25743B00032B65/$File/Std_Minister2008Broc.pdf)

Woolworths own promotions that focus on the former AFL player David Schwarz do not mention self-exclusion. It highlights the importance of "being honest with yourself about your gambling."

A visual reference to self-exclusion that frequently appears at Woolworths associated venues is in Part 2 of the Victorian Commission For Gambling Regulation Rules being clause 3 (2) (c). This reference appears as fine print in a poster that is typically placed near the cashier area.

The following is a link to access this poster:

[http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/CC60BBFCC937370FCA25728A001C1FEB/\\$File/VCGRVenueRules2007.pdf](http://www.vcgr.vic.gov.au/CA256F800017E8D4/WebObj/CC60BBFCC937370FCA25728A001C1FEB/$File/VCGRVenueRules2007.pdf)

Based upon these facts, (with the exception of a Tabcorp sticker on the exterior door of The Rex in Port Melbourne) there was no visible notice of the availability of a self-exclusion facility in any of the Victorian pokie pubs or clubs visited.

Queensland

The required signage for Queensland can be found here:

<http://www.olgr.qld.gov.au/resources/resGamblingDoc/Signage.pdf>

The third mentioned form of assistance on these posters refers to “exclusion from this venue when gambling becomes a problem”. It is submitted that the size and position of these words critically impedes its effectiveness as a source of information.

A small takeaway brochure found in some Queensland venues provides a description of the self-exclusion process.

Depending upon the Commission’s view of the prominence of the notice about self exclusion on the poster and the placement of that poster in the venue; Queensland comes closest to achieving the Commission’s 1999 statement.

New South Wales

While not the subject of PokieWatch.org inspection NSW issued a March 2009 notice on self-exclusion. This notice requires venues to provide the following information in all areas where gaming machines are located:

“A statement advising patrons that exclusion scheme is available
The name and contact details of the person or body who is able to assist patrons with becoming participants in the self-exclusion scheme conducted in the venue.”

In terms of the Commission’s own recommendation, the provision of this information is lacking. It fails to explain how self-exclusion might work.

2.2 Visibility of messages about possible damaging behaviour

The 1999 Commission Report commented on these matters on page 16.31 to 16.32. Reproduced below are the words set in bold type on these pages:

“The Commission considers that there is a need for governments to provide clear information to the public about:

- what is problem gambling;
- the fact that people of all ages, sexes and backgrounds make up the group of problem gamblers;
- its signs (such as chasing losses and loss of control) and self-assessment¹⁷;
- some of the risk factors (such as depression or stress);
- its consequences (poverty, job loss, relationship breakdown, depression and suicide); and
- advice on where help may be obtained (and indicating that this is a free service).”

“Such information should be made available at gambling venues in ways that are just as visible as signs promoting gambling. They should be positioned on any nearby ATMs in venues, on gaming machines, at the cashier’s and at points where people may be seeking help with other public health problems”

“The Commission considers that jurisdictions developing appropriate health promotion in this area consult existing experts in the public health area about the best way of informing people about gambling risks in a way that is most likely to reduce the hazards of gambling.”

“there is a need for a national body which undertakes independent research into gambling problems and into effective public health measures to counter risks”

“Effective information dissemination requires visibility”

The PokieWatch.org findings are:

- The messages vary from state to state
- Execution is uneven

Victoria

Links were provided on the previous page to the pdf images of notices and brochures placed in Victorian pokie venues. The messages in these signs, brochures and posters conform to the statement of the Commission at the top of page 16.31.

PokieWatch.org records the placement of talker signs on each electronic gaming machine. The objective is to determine whether the venue operator embraces making visible the messages on these talkers or seeks to impede vision of the sign.

The statement made by Woolworths Chief Executive Officer, Michael Luscombe, to Woolworths shareholders at its 2007 Annual General Meeting held in Sydney was that:

“On all of our gaming machines there are signs talking about the fact that you cannot win on those machines, right in front of the face of that area.”

This statement is not an accurate record of what occurs. Firstly, in Queensland and South Australia there are no such signs on their pokies. Secondly, signs are typically placed so that the bottom edge is in line with the credit information. Credit information is located at the very top of the video face.

PokieWatch.org is of the view that placement of talkers on the top box rather than the EGM itself does not comply with either the spirit or the technical requirements of the Victorian Gambling Regulation Regulations. Woolworths associated hotels in Victoria continue to place these signs on the top box.

The description of a ‘top box’ and the ‘egm’ are set out in the schedules to the Gambling Regulation Regulations.

The actions of Woolworths in the City of Monash in response to PokieWatch.org initiatives are illustrative of this stakeholder's behaviour. Initial PokieWatch.org inspections found that a large number of these talkers were placed on the top box. A complaint was made to the VCGR and copied to Woolworths and its associate Australian Leisure & Hospitality Group (ALH). The VCGR determined that placement of these talkers at the very top of the top box was acceptable even though the sign would be removed from the vision of the gambler. Notwithstanding, many talker signs were moved lower in the City of Monash.

Mr Luscombe acknowledged to his directors and shareholders that an audit had been conducted after receipt of the complaint.

New signs have been issued in Victoria since PokieWatch.org began. This occurred subsequent to the letters concerning placement in the City of Monash. It provided venues with an opportunity to move the talkers to a more visible place. However, many placements remained on the top box.

Woolworths placement of signs in Victoria can be contrasted with their placement of promotional talkers in their Queensland associated venues. In Queensland, most pokie talkers are placed opposite the animated reels. Queensland practices for commercial messages comply with Mr Luscombe's description "Right in front of the face of that area" while gambling warning talker signs in Victoria do not.

The photograph below is from the website of Woolworths associated Nudgee Beach Hotel. When the PokieWatch.org inspection occurred five of these talkers promoted eating at the venue. Balance of the talkers promoted either a player loyalty program or a gambling based event.



The photograph below is from the web site of Woolworths associated Albany Creek Tavern. The content of these talkers was not recorded. The position of the talkers opposite the animated reels should be noted.



As for all practices considered in this part of the submission; it is not submitted that placement of talkers will cure all harmful behaviour. Rather, it is objective evidence of Woolworths unwillingness to promote messages about problem gambling at its pokie venues. This underlines the need for prescriptive regulation.

Please note that only the Victorian government brochure provides the telephone number of the Gambler's Helpline. It has been omitted from both the poster and the talker.

Queensland

Queensland offers a mix of messages. The main message informs gamblers where to get help. Links to the actual posters have been provided above.

Most frequent placement of posters, brochures and cards observed in a Queensland venue was placement:

- Near cashier,
- Change machine, and
- ATM

Set out below is a table describing the locations for this information at the Brisbane area pokie pubs inspected:

Hotel	# of Locations
Albany Creek	2 groups. 1 atop change machine and the other by the cashier.
Beenleigh	3 groups; cashier/ coffee station, change machine, exit wall to TAB / public bar.
Bonny View	2 groups. 1 poster on wall. 1 by the cashier
Brighton	1 by the cashier. 1 by the coffee station.
Brook	1 x poster on way to toilets. 2 x beer mats on tables in smoking area for responsible gambling. 5 locations for pamphlets. 1 had fallen down between the pokies. 1 x poster by cashier.
Capalaba	Poster for Helpline on pillar in middle of pokies room. Another large poster on wall for HelpLine. Poster and cards at change machine and coffee machine.
Carindale	4 locations. Cashier, Coffee station, Change machine and in a very dark corner next to a KENO sign. Other gambling regulation information is on the wall in this dark corner and not legible owing to lack of light.
Centenary	One set next to change machine. Another set in corner missing cards.
Cleveland Sands	1 group by cashier / coffee station area. Poster on pillar at same area.
Club (Waterford)	1. Near cashier.
Edinburgh Castle	3 groups at the coffee station, change machine and the cashier. Also a poster on responsible gambling on wall.
Everton Park	2 groups. Cashier and Coffee station. They are on the same wall next to each other.
Ferny Grove	Near coffee station and cashier.
Fitzy's Loganholme	2 posters on wall when exiting. Change machine. Coffee area. Cashier has pamphlets. Cashier in TAB room. Cards are attached to a How To Bet sheet.
Fitzy's Waterford	Located at cashier and coffee station.
New Inala	5 x tent type Hot Tips talkers atop pokies. 1 x pamphlets at back end near cashier. 1 x poster on wall. 1 poster with pamphlets near coffee
Indooroopilly	Placement of brochures not at front of the cashier. On side, in entrance from the TAB impeding visibility.
Jindalee	None recorded.
Kenmore	3 signs. Cards by coffee station. Sign on the bar promoting the note changer.
Koala	1 group by coffee station / cashier.
Lord Stanley	3 groups. 2 with cards.
Mansfield	2. Cashier and Coffee station.
Newnham	1 x cashier. None by coin changer.
Nudgee Beach	6 x Helpline posters. 2 x pamphlet holders.
Oxley	One set of cards and poster near the coffee station on the change machine. There were cards located in a shelf under the large TV in the pokies room displaying KENO results.
TCB Oxley	Near coffee station.

Prince of Wales	2 groups: one by the cashier, the other by the change machine.
Regatta	2 groups both near the coffee station.
Royal English	4 groups; bar, cashier, change machine and wall near cashier / coffee.
Royal Exchange	Responsible gambling beer mats on tables outside pokies room and small poster at cashier.
Salisbury	1 sign with cards when going into toilets. Pamphlet holder near cashiers had broken piece that had fallen over and obscured all pamphlets. Nothing near coffee station.
Taigum	Helpline posters near coffee machine and cashier.
The Gap	Posters located at cashier station(*2), coffee machine, main exit and entry (2 signs - 1 in each direction). Cards located on top of note breaker, and at cashier station. Brochures on the change machine.

South Australia

In South Australia there is little information required to be disseminated relating to the first five factors set out on page 16.31 of the 1999 Commission Report. The focus is on the Gambling Helpline stickers and cards.

The paragraphs below are extracted from the web page of the South Australian Office of Liquor and Gaming titled "Responsible Gambling Code of Practice" http://www.olgc.sa.gov.au/default.asp?page=gaming.responsible_gambling.code_of_practice.Gaming_Responsible_Gambling_Code_of_Practice_Notice_021203.htm

"Gambling helpline stickers are required to be displayed on the front of each gaming machine in a manner that does not obstruct the artwork, on or near each ATM and EFTPOS located in the premises and on or near any ATM or EFTPOS facility located near the premises if the licensee can reasonably be expected to exercise control over that facility."

Gambling Helpline business cards also including the condensed warning message 'Gamble Responsibly' are required to be placed at or near each gaming machine and throughout all gambling areas. Cards must also be made available on or near each ATM and EFTPOS facility located in the premises and on or near any ATM or EFTPOS facility located near the premises if the licensee can reasonably be expected to exercise control over that facility.

Venues appear to be fully compliant with the requirement about stickers. Perhaps due again to the clear prescriptive nature of the requirement, there was compliance with the requirement of cards placed on the ATM.

Variation was observed with compliance with the requirements as to business cards in the pokie room. This may be due to the non-prescriptive language "at or near". In some instances, card holders are placed between every pokie. In other instances, card holders are placed at the end of an aisle or bank of pokies.

The particulars set out below are for the 2nd visit cycle.

Hotel	Placement of Helpline cards
Aberfoyle Hub	Not between the pokies. 5 groups of cards. 3 groups of brochures.
Bridgeport	3 x brochure holders. 1 x Helpline brochures. 8 x card holders set between pokies usually to the back. Some turned around. 1 by the coffee station. 1 on fireplace mantle. Dining room entrance to the pokies room had a floor ALH sign. There were 2 gambler's helpline brochure holders on this sign
Brighton Metro	Cards on 2 change machines but not the third. 6 pamphlet holders. At ends of all banks of pokies except for 2.
Buckingham Arms	4 groups of pamphlets. 1 poster near coffee station.
Enfield	4 card holders between pokies. 3 pamphlets by change machine, coffee station and end of pokies row in the corner.
Eureka	19 card holders between the pokies. All located to the back. 8 were not visible as they were hidden under the reserve signs. 2 were turned completely around. No pamphlets were located near the teller. Also 8 lots of pamphlets.
Esplanade	26 pokies have cards attached to them. Cards and pamphlets on top of the ATM
Exeter	13 card holders. 1 fallen over. Placed between pokies. Nothing on change machine in corner. Change machine near entrance has pamphlet nearby and also a KENO holder.
Federal	Cards between every pokie except for 2. Pamphlets by cashier were partially obscured. Cards atop ATM. No pamphlets or cards near change machine
Findon	Card located atop one change machine. Pamphlets by other change machine. 2 others had cards on the bench nearby. Dark blue cards between every pokie. Also 3 on ledge on far wall (from the bar) of the pokie room.
Finsbury	Placed between every pokie. The holders next to pokies #23 and #12 were empty.
Gepps Cross	No cards. Pamphlets by coffee station, cashier and exit door. Nothing on change machine in middle of pokie area other than a helpline sticker.
Grand Junction	10 plus cashier. Poster and cards on change machine near pillar. Located between pokies. Placed to the back wall.
Halfway Beverley	4 Pamphlet card holders. 3 empty card holders. No cards by change machine.
Hampstead	1 card holder. 7 x pamphlet and card holders. 1 lot placed between pokies. 1 near cashier. 1 on change machine. 1 atop the cigarette machine.
Hendon	Holder between all pokies except for 3. 1 turned around. Cards on top of all change machines.
Henley Beach	5 card holders. On cigarette machine and ends of banks of pokies. None on either change machine - to the side and below for 1 of the change machines.
Highbury	Holder between every pokie except for 5 spaces. 3 turned around.

	None placed to the front. All to the middle or back. Posters for responsible gambling near change machines. No cards by either. Pamphlets not in coffee station but on nearby cigarette machine.
The Links	19 groups. Pamphlets atop or near change machines. Located between pokies but pushed back as far as possible into middle of bench.
New Reservoir	13 groups. 6 cards. 3 Pamphlets. 4 Both. On change machines. None between pokies.
NY Bar & Grill	5 groups of cards/pamphlet in holders vs 7 groups of KENO cards. 1 group of cards/pamphlets at cashier that also displayed a range of KENO options. No gambling helpline information in bank of pokies in middle of the room.
Norwood	3 pamphlet holders. 26 card holders. Placed between the pokies towards the back. No cards on note changers. Uses dark blue cards which are hard to see. Bank of pokies has grates to stop purses being stolen.
Paradise	9 card holders. Placed on ends of banks of pokies. Cards on the 1 change machine in the pokie area were placed down the bottom and to the back so that they were hard to see.
Payenham	2 pamphlet groups. 33 cards between pokies. None on either note changers machines. 13 pokie loyalty club controls had plastic holders with helpline card inside. Many had fallen down within the holder or were on an odd angle.
Playford	11 pamphlets and card groups. Cards on both change machines. Combined pamphlet and card located end of banks of pokies.
Ramsgate	8 groups. 2 holders grouped together. At ends and between banks of pokies. Not on but near to change machine. One change machine had responsible gambling poster nearby.
Rose & Crown	Did not record
Royal Oak	One change machine had cards on it. The other did not. It had a poster nearby. Pamphlets in every corner. Cards were between every machine. Placed to the front. Best practice.
Salisbury	26 card holders and 7 pamphlet holders (total of 33).
Seacliff Beach	10 groups located at the ends of the banks of pokies. Notices near cashier. Printed information in lounge area. No helpline cards on change machine. Poster only.
Slug 'n' Lettuce	Cards on change machines. 9 groups located at ends of banks of pokies.
Stockade	14 groups. 2 only pamphlets. 2 cards only. The holder near change machine was hidden behind the machine and not visible.
Victoria	Table - Dark Corner - KENO area x 2. None between the pokies.
Waterloo Station	18 cards. 1 set of pamphlets. 5 x both in one holder. Cards between machines, towards the back. Change machines had cards on top.
Western	5 groups of pamphlets between the pokies on the far wall. Pamphlets on shelf near coffee station. A pamphlet group was placed on the bench near the change machine in the corner.

As before, the variation in placement and care suggest the need for prescriptive regulation.

2.3 Practices that prolong pokie gambling

These practices include:

- Being served a refreshment
- Eating a snack or a meal
- Announcements

A typical PokieWatch.org venue inspection is about 15 -20 minutes in duration occurring between early afternoon to early evening. Accordingly, these observations are random in nature rather than a representative sample.

Please note the differences in practice by the same operator between its venues in Queensland and Victoria.

As set out above, Queensland provides a web page called "Is your local venue committed to responsible gambling?"

<http://www.olgr.qld.gov.au/responsibleGambling/communityInfo/resVenues/index.shtml>

On this page it states:

"Venue staff should not serve drinks to patrons playing gaming machines."

"You might hear announcements about other activities or letting you know the time. Tea and coffee facilities should be located away from the gaming machines."

The 2004 Queensland Responsible Gambling Code of Practice states:

"4.3 Service of alcohol on gambling provider's premises is managed in such a way as to encourage customers to take breaks in play"

These practices are intended to direct gamblers to other activities that will result in a break in their pokie gambling.

At the Woolworths associated Edinburgh Castle Hotel, a talker stated "As a part of responsible service staff members are not allowed to bring food to the machines".

Contrary to these Queensland practices, at Woolworths associated venues in Victoria staff have been observed serving food and coffee to patrons while they are gambling at their pokies.

During the first visit to the Royal Hotel in Sunbury, Victoria, (8 April 2008 about 10:15 AM) gaming staff were instructing gamblers that they had to be playing at their pokies in order to be eligible to receive a ticket for a contest. People who had been gathering together returned to their pokies.

During the 28 August 2008 inspection at the Woolworths associated Hallam Hotel, Hallam, Victoria there was a public address announcement. The announcement

promoted the Wild Cash jackpots. It informed gamblers which pokies were jackpotting and what the jackpots were on those pokies.

At the 27 March 2008 inspection of the Werribee Plaza Hotel there was a public address announcement in gaming room for complimentary tea and coffee plus an invitation to order your snacks.

Food has been observed being placed on the bar (Monash, Vale and Sandringham hotels) with serviettes. The patrons get up from their pokies, take some food, and return to their pokie gambling. At the Monash, the public address system was used. At Hawthorn Football Club's Vegas at Waverley Gardens, venue staff pushed a cart between the aisles of pokies serving coffee to gamblers while at their pokies. The York at Lilydale promotes 'finger food'.

Perhaps due to use of the less prescriptive word 'should' in the regulation; coffee facilities were observed at Brighton Hotel, New Inala Hotel, The Jindalee and The Gap Tavern next to the pokies. This is about 10% of the sample.

2.4 Marketing displays in pokie rooms

The Queensland web page called "Is your local venue committed to responsible gambling?" also prescribes that:

"Venues should also promote other activities which may be taking place e.g. entertainment, trivia nights, meal specials."

and

"Gambling activities will not dominate advertisements or promotions, especially where there are other activities to promote."

While these objectives are given greater weight in Queensland venues, the opposite practice occurs in other jurisdictions.

Nearly every one of the 180 PokieWatch.org inspected venue pages records the lit posters on display. The author of this submission has been engaged in management of radio and television stations since 1978 and is experienced in audience acquisition and retention. Overwhelmingly, these posters are intended to promote gambling generally, prolonged stays in the pokie area, and repeat visits.

- Pokies – new features, new machines
- Lotto – gambling activity that can be pursued on premise
- Keno – gambling activity that can be pursued on premise
- Membership – joining a player loyalty programme that awards incentives from repeat and prolonged play
- Jackpots won – imply that the venue is somehow lucky and worth prolonged visits
- Jackpots to be won – if you gamble long enough, the gambler could win one of these large cash payouts.
- Tabcorp – "You Can Feel It" Reserved Signs – imply that a jackpot may be coming and that it therefore worthwhile reserving the pokie that the patron has been gambling on.

Most venues supply KENO cards and pencils on every table encouraging further gambling.

These posters, notices and practices comprise targeted advertising at its most extreme focus. Nearly everyone in the pokie area is pre-qualified as being interested in gambling by his or her very presence.

Compare this with a person walking by an advertising sign in a mall. By being in a mall they are potential shoppers but not for the product that is being advertised. Even less targeted and less likely to purchase an advertised product is a passenger in a car that drives by a billboard. They may be reading a book or listening to the radio.

To reproduce all observations on the promotions that are placed in the pokie room would unnecessarily lengthen this document. Instead the Commission is urged to look at each PokieWatch.org page to get a sense of the pokie room environment.

2.5 Cards and Posters in toilets providing information about gambling help

This is a voluntary measure not prescribed in any government code of conduct.

Gabriella Byrne and Mark Zirnsak, both of the Victorian Christian Task Force on Gambling, have provided information on this measure. Problem gamblers considering seeking help are more willing to obtain information about such a service in confidence rather than asking gaming room staff or making a public display by writing down a number.

This information suggests that this practice should be a prescribed part of a strategy to help problem gamblers.

Because of its apparent value, fulfilment of this measure was recorded for all pubs and clubs visited by PokieWatch.org. To reproduce all observations would unnecessarily lengthen this document. Instead the Commission is urged to look at the observations on each PokieWatch.org page.

Based upon the evidence gathered, this procedure is best executed in Victoria. In other states Woolworths provide posters but few cards in pokie pub toilets. In comparison, Coles associated venues demonstrate poor practice with very few providing cards. There is little excuse for this deficiency as Coles hotel compliance management is based in Melbourne.

Venues associated with both groups neglect to provide posters and cards in toilets not located in the immediate pokie area.

Any regulation should require posters and cards to be placed and maintained in all venue toilets.

2.6 Placement of ATMs

PokieWatch.org's observations concern two aspects:

- The location of ATMs relative to the pokie area
- The visibility of ATMs in the pokie area

During the many inspections conducted for PokieWatch.org, on every occasion a person has been observed withdrawing money from an ATM in a pokie pub or club, that person has headed to the pokie area rather than out of the venue or to the eating or drinking areas of the venue.

The observed performance of venue operators regarding their ATM obligations in each jurisdiction indicates that prescriptive regulation is required to enforce responsible pokie gambling practices.

South Australia

The web site of Office of Liquor and Gaming Commissioner provides:

“ATM and EFTPOS facilities are not permitted to be located in the designated gaming area of a gaming venue.”

http://www.olgc.sa.gov.au/default.asp?page=gaming.Responsible_Gambling.Gaming_ATM_and_Eftpos_Facilities_021203.htm&menu=gaming



To the left is a picture from the web site of the Aberfoyle Tavern, a venue associated with Woolworths. While the ATM is located about 16 metres from the nearest pokie behind a partition, a red and white sign has been placed in the pokie room to indicate the location of the ATM. The same practice was observed at the Eureka Tavern, Halfway Hotel Beverley, Highbury Taverner, The Links Taverner, New Reservoir Hotel, New York Bar & Grill, Playford Tavern, Ramsgate Hotel, Salisbury Hotel, and Stockade Tavern

ATMs were observed in the same room as pokies at Woolworths' Norwood Hotel, Royal Oak Hotel and Rose & Crown. These are all small rooms. At the Norwood and the Royal Oak, the ATM is visible through a clear glass cabinet. At the Rose and Crown, the ATM is separated by a clear glass partition. In the event that Rose and Crown gamblers might still miss its location there is a sign “ATM” just above it.

The ATM is visible in the pokies area at the Western Tavern, Brighton Metro Hotel, Buckingham Arms Hotel, Payneham Tavern (it is placed very close to pokie #15), and Slug 'n' Lettuce (door was left open during both visits).

While the ATM was not located in the pokies area of the abovementioned hotels, to all practical effect, it may as well have been as visual access to the ATM is encouraged.

In other hotels, the ATM was located in the venue entrance.

Queensland

The Queensland Responsible Gambling Code of Practice 2004 provides:

“ATMs are not to be located in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and practicable.”

The intention of this requirement is that the ATM is not a presence for gamblers in the pokie area. The facts illustrate that venue operators, while complying with the letter of the requirement place the ATM so that its physical presence is known and the ATM is easily accessible.

The table below particularises ATM locations at the venues visited. The number for distance is an approximation in metres from the ATM to the nearest pokie. All numbers would be diminished if the calculation was to the pokie area only.

Hotel	Location	Distance
Albany Creek	There are 2 ATMs located in the main entrance to the tavern which is also the main entrance to the pokies room	16
Beenleigh	Located in public / TAB / Sports bar, it is as near to the pokies room as practicable.	12
Bonny View	Located around a corner in the sports bar. There is a partition around the ATM.	13
Brighton	ATM in Bistro. If you follow the hallway to the right as you enter the pokies room - there it is. On glass exterior wall there is a red, white and blue ATM sign.	25+
Brook	In bistro to the left when entering main entrance. Highly visible through glass window.	Long distance
Capalaba	Located in the entrance from the card park. Directional sign in the entrance for the ATM	6
Carindale	Located outside the toilets.	12
Centenary	Located in bistro. Visible on the way to the pokies.	7
Cleveland Sands	Located in entrance. Visible to shopping street.	Long distance
Club (Waterford)	In main bistro entrance.	21
Edinburgh Castle	If swing door is open then the ATM is visible. ATM also visible to street. Located in Gympie Road exit.	Not recorded
Everton Park	The ATM is diagonally across the bistro from the rear entrance to the pokies room. Attention to its location is drawn by a A4 sized sign on the partition of entry to the bistro. It is visible as soon as one exits the pokies room.	Long distance
Ferny Grove	There are signs visible that indicate the location of the ATM. The ATM is located in the bistro/pokie room entrance around the corner from bistro reception desk.	21

Fitzy's Loganholme	Two ATMs service the pokies. One is located in the bistro and the other opposite the bar in the TAB area. Neither are directly visible inside the pokie room but they can be seen upon exit. It is possible to see the ATM in the TAB from pokie #6. Both have lit signs fixed to the roof immediately above them which draw attention to their location.	Not recorded
Fitzy's Waterford	2 x ATMs in passageway between TAB bar and pokies.	Not recorded
New Inala	Located in bistro.	14
Indooroopilly	Immediately visible upon exit in entrance to TAB. Can be seen on odd angle inside the pokies room.	20
Jindalee	Located in entrance for the TAB and pokie room..	Not recorded
Kenmore	The ATM is located in the bistro near the entrance to the pokie room. Although the ATM itself is not visible; there is a sign visible in the pokie room with the letters "ATM" and an arrow pointing to the location of the ATM. This is in the transition area between the pokies room and the eating room.3 signs. Cards by coffee station. Sign on the bar promoting the note changer.	16
Koala	Visible immediately upon exit. Located in bistro.	21
Lord Stanley	Visible upon exiting the pokie room to the left. Located in bistro next to the glass door to the public/TAB bar	Long distance
Mansfield	Can see ATM sign above the screen that has been built to visually shield the ATM. Located diagonally across the bistro from the pokies room	25
Newnham	Located in virtually the same room but shielded by a partition. Top of the ATM is visible if standing at the bar cashier area.	Not recorded
Nudgee Beach	Located in the bistro entry to the pub.	Not recorded
Oxley	Located in transit area between the main entrance and the bistro. Sign in main entrance indicates that ATM and Pokies are in the same direction.	8
TCB Oxley	Not visible in the pokies room so long as the automated doors are shut. Another ATM located outside the bistro was out of order.	Long distance
Prince of Wales	Located between the bistro and the pokies room.	6
Regatta	3 ATMs in the premises. 2 in the street entry near the TAB. The ATM in the basement is not visible from within the pokie room but is immediately visible upon exit.	Not recorded
Royal English	In Station Street entrance well away from pokie room.	Long distance
Royal Exchange	In laneway / dining area outside of pokies room leading to rest of the hotel.	11
Salisbury	ATM placed near a clear glass section of the partition so that it is visible in the pokies room	13

Taigum	Located in the entranceway. Blue and white ATM sign.	Not recorded
The Gap	Located in bistro.	20 +

Victoria

Paragraph 2.2.3 of the Australian Gaming Council's Responsible gaming code issued in September 2001 provided that:

"Gaming venue operators will phase in measures to ensure that ATMs are not visible to any customer playing an EGM."

Paragraph 5.6 of Tabcorp's Responsible Gaming Code of Practice provides:

"We require that ATMs at venues

- * are not located within designated gaming areas
- * are not visible to a customer playing a gaming machine; and
- * have on or near them information on who to contact, should assistance be required for a gambling related problem"

Section 3.5.32A(1) of the Gambling Legislation Amendment (Problem Gambling and Other Measures) Act 2007 provides:

"A venue operator must not provide, or allow another person to provide, an automatic teller machine in a gaming machine area"

While the ATM is not located in the pokies area of any Woolworths associated pokie pubs or clubs, it is placed so that gamblers will see the ATM upon entry to the pokie area.

In some instances, the ATM is visible in the pokies area; Chelsea Heights Hotel, Fountain Gate Hotel, Moreland Hotel, Nu Hotel, Seaford Hotel, Stamford Hotel, Wheelers Hill Hotel and the Waltzing Matilda Hotel.

When pokie hotels are located in shopping areas, ATMs that are not part of the venue become visible. This occurs at the Plough Hotel. At the Century City Tavern there is a Commonwealth Bank ATM outside the pokie area despite an absence of other tenants in that part of the mall.

In some pokie pubs, a partition is built around the ATM to restrict visibility. In some instances, a sign with the letters ATM is affixed to the partition frustrating the purpose; this was most recently observed at Milanos in Brighton.

In other venues directional signs (not on the partition itself) disappeared after the first PokieWatch.org visit. At the Coolooroo Tavern, Hallam Hotel and the Elsterwick Hotel, the directional signs remained. At the Tudor Inn, the ATM machine itself was obscured by a wooden divider and the word "ATM" had been painted out. However, there is a sign on the wall above the ATM showing which ATM cards work. That sign, above the ATM is visible in the pokie area.

In other venues the partition is built so that the top of the ATM is visible over the partition. Sometimes the partition itself is transparent or spaces are left in the partition allowing vision. These practices were observed at the Blue Bell Hotel,

Coach & Horses Club, Court House Hotel (Brunswick), Cramers Hotel, Croxton Park Hotel, Deer Park Hotel, Doncaster Hotel, Excelsior Hotel, Glengala Hotel, Keysborough Hotel, Manhattan Hotel, Mitcham Hotel, Palace Hotel, Pascoe Vale Hotel, Plough Hotel, Prince Mark Hotel, Racecourse Hotel, Rose Shamrock Hotel, Royal Exchange Hotel, Sandbelt Hotel, Sands Hotel at Carrum Downs, Somerville Hotel, Westmeadows Tavern, and the York on Lilydale Resort.

At Mac's Hotel in Melton there are two ATMs. One is in the entrance area. A glass screen has been erected around this ATM although one can easily discern that there is an ATM behind the glass. This ATM is visible from pokies 79-82 and 63-65. The other ATM is in the bistro area and close to the entrance to the TAB room. There is no visual shield around this ATM. It is visible from the whole of the gaming bar area.

The Meadow Inn Hotel built a wooden divider around their ATM. However, on the exterior of the divider there is a sign that says, "This ATM accepts..." and then displays pictures of all the cards it accepts. This sign is visible to patrons while gambling at their pokies.

In two instances, the venue operator placed a plastic plant in front of the ATM; The International Club and the Mountain View Hotel. The ATMs remained visible.