



ANGLICARE TASMANIA INC
GPO Box 1620
HOBART TAS 7001
Tel (03) 6231 9602
Fax (03) 6231 9589
Email – c.jones@anglicare-tas.org.au
ARBN 114 156 955

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Submission on the Draft Report of the Productivity Commission's Public Inquiry into Gambling

Dear Commissioners,

Anglicare welcomes the Commission's draft report and in particular the importance it places on effective harm minimisation measures and taking precautionary policy action.

Anglicare would like to see gambling treated in the same way as alcohol, obesity, and illicit drugs – that is, as an issue of public health. We are told that regular drinking or illicit drug taking is likely to lead to problems, we are told that obesity requires both individual and institutional action. The Productivity Commission makes a clear case that regular gambling is likely to lead to gambling problems and Anglicare recommends that this message be used in gambling advertising.

We agree with the Commission that ordinary people can develop gambling problems because of the gambling technology, accessibility and nature and conduct of the venues. A significant issue for Anglicare is that technological changes are happening rapidly and yet harm minimisation measures are developing very slowly and do not make enough use of the technological changes. We hope that the final report will highlight this disparity.

Anglicare agrees with the Productivity Commission that decreasing the rates of loss and increasing the disclosure of information about gambling would be effective. People should understand from the information provided about gambling that they should expect to lose when they gamble.

Our comments on specific chapters are as follows.

Chapter 3 The policy framework

Anglicare is concerned that while the State government is responsible for collecting gambling taxation and levies, regulating gambling, providing help to those with gambling problems and arranging the licenses for the gambling providers, there is no independent oversight of gambling.

Chapter 5 Counselling and treatment support services

The Commission seeks feedback on the need for a national accreditation system for problem gambling service providers.

Anglicare supports a national accreditation scheme and suggests this could be done through a short online training package. Existing counsellors could complete modules at work, and in most cases it would be a quick process confirming existing skills and knowledge. For new gambling counsellors it would be an induction training package that can also be completed at work. All counsellors would have to complete a short online test for each module. A national accreditation scheme would have to recognise state and territory differences in terms of legislation, industry and help services.

Chapter 6 Gambling information and education

The technological advances in online, mobile phone and television gambling require particular attention. The growth of this industry has not seen concomitant advances in harm minimisation. Harm minimisation should be developed ahead of approvals for new methods of gambling, and if gambling is difficult to regulate online then governments must provide information and education about the risks. To this end, Anglicare recommends that a national regulatory body be established to seek ways to enforce harm minimisation on these modes of gambling.

Chapter 7 Pre-commitment strategies

Anglicare hopes that pre-commitment technology (smart cards) will be introduced in the near future.

Draft recommendation 7.3, point 4: Revocation [of self exclusion] only to be permitted after evidence of attendance at a counselling service and the judgement by an appropriate professional about the capacity for the person to safely gamble.

Anglicare is concerned that counsellors should not be put in a position to make a judgement about another person's capacity to change their behaviour.

Draft recommendation 7.3, point 5: People seeking revocation should, after a successful application, face a period of up to three months before it takes effect.

Anglicare believes that 3 months might be excessive. The one week 'cooling off' period seems to work well in Tasmania.

Chapter 9 Access to cash and credit

Anglicare supports the draft recommendation that venues pay any gambling prize that is above \$250 by cheque as this should satisfy recreational gamblers but delays access to the money for people with a gambling problem. For this reason, we do not support direct credit of winnings into the gambler's account unless there is a minimum of one day for the money to be cleared for access.

Chapter 10 Accessibility of gaming machines

The Commission seeks feedback on the period of shutdown that would best target problem gambling, with least side-effects on recreational gamblers.

An opening period from midday to midnight would provide 12 hours of gambling each day, which Anglicare considers to be ample time for the recreational gambler. Anglicare recommends that these hours should also apply to the casinos. Anglicare also supports having standardised opening times for all venues so that people with a gambling problem do not go from venue to venue seeking different opening hours. We also support shutdown periods within the opening hours.

Chapter 11 Game features and machine design

Anglicare is pleased to see the recommendation that betting limits be reduced to \$1 per spin with a \$20 limit on the amount that can be in the machine; unfortunately, however, following the release of the draft report the Tasmanian State Government decided to reduce the betting limit to \$5. The reduction to \$5 was done with no modelling and the Government does not know what its financial impacts are likely to be, nor does it know what the impacts would be if they had reduced the betting limit to \$1. At the \$5 spin rate a Tasmanian with an

average household income¹ (Australian Bureau of Statistics 2009, p. 31) could lose nearly all their weekly pay in an hour.

The Commission seeks feedback on the use of loss-limited gaming machines as an appropriate harm minimisation measure. It seeks views on the specific option outlined above, and in particular, on design features that could make it practically implementable. It also seeks views on any other option that would have essentially the same harm minimisation benefits.

Anglicare supports:

- \$1 betting limits per spin
- Machines should accept tokens instead of cash (players would be more aware of money spent gambling and would get a break from the machine when they purchase tokens)
- Introduction of pre-commitment cards/Smart cards
- Breaks in play with pop-up messages providing problem gambling indicators and help services information as well as specific money spent/lost and time spent gambling for each patron

The rationale for these proposals is that patrons are being asked to make responsible purchasing decisions at a time and location that they are most affected by dissociative states and loss of impulse control. They are currently encouraged to keep playing in the hope of winning. Literature and help service information in venues is hit and miss in terms of availability, accessibility and opportunity to access them discretely. Provision of this information to all players ensures a break in play, and ensures that patrons are aware of the available services and the risks of developing gambling problems.

In view of the limited research on the effects of jackpots on gaming machine play, the Commission seeks further views and information about whether any changes are warranted and, if so, what form they should take and the likely associated costs and benefits.

Full disclosure about the real odds of winning a jackpot should be provided to players before they commence play and in the proposed pop-ups (see above). However, many of Anglicare's clients do not play jackpot machines - they play for the free spins and these become a ritual for them so reducing free spins and providing information about how much a person has lost in a session may assist in reducing problems.

Chapter 12 Online gambling and the Interactive Gambling Act

Anglicare is concerned about the potential growth of online gambling. We therefore support any action that would increase regulatory oversight of the industry and reduce harm. The Commission's draft report recommends repealing the Interactive Gambling Act and replacing it with new and strict probity and harm minimisation standards. While the details are not yet fully developed, Anglicare supports this idea.

Chapter 14 Regulatory processes and institutions

The Tasmanian Gaming Commission has limited resources with no staff of its own and reports directly to the Treasurer. When the Tasmanian Gaming Commission, with new commissioners, did give strong advice to the Treasurer about options for harm minimisation, he ignored the majority of the options.

Anglicare therefore welcomes the Commission's draft recommendation that regulators have statutory independence from government, regulatory control over all forms of gambling, and a charter that emphasises the public interest and in particular consumer protection and harm minimisation. We also support the draft recommendation that consultation processes be strengthened (and, in the case of gambling licences and poker machine locations, introduced) and we support the introduction of regulatory impact analysis.

Chapter 15 gambling policy research and evaluation

¹ Average household income is calculated as the equivalised disposable household income, which in Tasmania in 2007-08 was \$718. Equivalised income can be viewed as an indicator of the economic resources available to each individual in a household.

Anglicare would like to see more research conducted into areas that would assist in assessing the effectiveness of harm minimisation.

A handwritten signature in black ink that reads "Chris Jones". The signature is written in a cursive style.

Chris Jones
Chief Executive Officer

References

Australian Bureau of Statistics 2009, *Household income and income distribution, Australia, 2007-08*, cat. No. 6523.0, Australian Bureau of Statistics, Canberra.