

# **Submission to the Productivity Commission Inquiry** **into** **Australian Gambling Industries.**

## **Introduction**

This submission seeks to bring in to focus some of the impacts on the wellbeing of Aboriginal and Torres Strait Islander (ATSI) communities due to recent changes to the structure and mix of the gambling industry within Australia. The structure of this submission has largely been developed to address matters raised in the “Australian Gambling Industries : Issue Paper September 1998”.

Prefacing this introduction it needs to be clearly stated that due to a range of limitations, the thoughts and views expressed in this document can only but scratch the surface of the issue. It is a key recommendation that adequate resources be dedicated to uncover and redress dis-empowering impacts upon ATSI communities related to the gambling industry. Adequate resources and a commitment to the advancement of mechanisms to enable ATSI communities to redefine and reset the place of gambling in community life needs to be coupled within the process of social inquiry.

Acknowledging the limitations faced in constructing this submission, it is hoped it assists to ensure that the issue of the interface between the gambling industry and ATSI people is acknowledged and tabled as an issue of substantial concern requiring immediate attention.

The submission progresses an argument that the institutionalised gambling industry derives a significant economic benefit through passing costs stemming from excessive gambling onto individuals, families and communities that are left to pick up the pieces. The ATSI community experiences disproportionate harmful consequences and lacks adequate attention in service responses to curb further disadvantage. Aspects of the manner in which the gambling industry does business leads to the view that it is not interested in the welfare of the community.

While not adequately researched, the ATSI community gambling profiles that exist describe greater participation rates in the percentage of people gambling and average expenditure to that of non-Indigenous Australians. This situation may in part be explained by ATSI people continuing to endure disproportionate social disadvantage such as lower income levels, home ownership, employment rates, household savings and long term prospects of upward social/economic mobility. This in our view creates a predisposition to chase the “miracles” offered by gambling enterprises to achieve some equity. Further as a “leisure” industry, it needs to be stated that many ATSI people are “involuntarily leisured”, adding to the dynamic of pursuing what initially seems to be a cheap form of entertainment in lieu of many other alternatives. ATSI people disproportionately experience lowered physical / mental health status. Grief and trauma is a significant problem. The linkage between grief and trauma and developing dependencies on gambling is documented in some gambling studies.

This situation sits beside a problem gambling service system aimed at redressing problems resulting from excessively gambling in States and Territories across Australia which are currently deficient in adequate strategic focus towards ATSI gambling.

This submission recommends the creation of a Federally administered fund to enable reasonable resources be available to ATSI communities, Aboriginal controlled health services and others, to enable the development of culturally appropriate strategies to reverse the current harm being incurred. This fund would be resourced by a dedicated portion of the proceeds from the 10% GST on gambling expenditure. Alternatively an additional impost of 2% GST on gambling expenditure could be channelled specifically for the purposes defined herein. This fund would be in addition to and compliment State/Territory allocations for gambling rehabilitation strategies.

Localised ATSI community involvement in both the determination and implementation of strategies to reverse the current trend is seen as essential to ensure efficient and effective gains.

## **The Nature and Definition of Gambling**

*What constitutes gambling?*

Gambling can be defined as the act of voluntarily risking anything of agreed value on the outcome of an event unknown at the time of the formation of the contract. Further this contract is specific to the conclusion of the event and results in the transfer of the agreed valued commodity upon the outcome of the event.

Central themes in this definition is the

- conscious status of a contract
- exchange based on the risk of the future unknown
- a defined agreed point of clarification and transfer terminating the contract.

Gambling as a consumable is both the “process of wagering” (a service) and the “outcome of wagering”(a good).

Gambling involves experiential value derived from participation such as (excitement, fun, social interaction, hope), as well as the more pragmatic outcome of the realised or unrealised gain.

The other point stressed is that gambling is a process that offers as a key component of the consumption experience the “chance to not be out of pocket” , in fact be better off financially post consumption. While the actuality of this outcome is rationally unrealistic, it is presented to the consumer by the gambling industry as a central function of the product. This marketing representation fuels a cycle of consumption intended to accumulate resources rather than deplete them. Implications for this marketing focus is both misleading, erroneous and not conducive to notions of being concerned about expenditure at the time of engagement and subsequent ability of the consumer to meet other needs.

*What should be considered as gambling?*

Gambling in an industry sense is any business interest that derives potential or actual benefit from the activities of gambling as defined above.

It may be worth noting the distinction in “real or mutual risk” industry groups and those that derive income from acting as agents for gambling activities.

Bookmakers for example enter into a contract of mutual risk, setting odds based on their assessment of the outcome. They risk incurring a loss. Many table games at the Casino's also offer mutual risk equations for the house. The house however has the ability to set table limits and define odds to ensure a “house edge” to enable long term viability. An example of this is 35:1 odds on Roulette for selecting one number when to cover all numbers requires 37 chips. The house also collects all “outside” bets when the number Zero is spun.

When industry acts as a medium for the placing and redistribution of wagers there is no risk of incurring losses as a result of the gambling activity. This group includes - raffles, bingo, electronic gaming machines, Totaliser Agency Boards and Lotteries Commissions.

*What are the particular characteristics of gambling that calls for community or government action that is different to that of other activities?.*

It is clear that the gambling business is an industry that realises an enormous amount of profit from individuals and the community. This is through selling economic hope and erroneous notions of accumulation. The lack of adequate information about the functions of many gambling products in our view significantly contributes to over expenditure by consumers. In some respects the gambling industry needs to be brought in to line with other Industry standards that ensures adequate consumer protection and consumer information of product characteristics. This includes the make up (ingredients) of the product, potential gains in a balanced truthful manner and information regarding all possible harm as consequence of consumption.

As previously stated gambling is a process of consumption that offers an equation of accumulation in both goods received and a possible return of the original expenditure. This makes gambling unique as a product and open to abuse because of the fact in most circumstances it is bought as a good when in fact it is consumption of a service which can not be returned.

One way of eliminating this contradiction would be to regulate gambling to ensure it could only be a service industry - not a goods industry. This would be by modifying gambling to only give participating consumers the ability to realise accumulation of more opportunity to engage in this entertainment by the placing further bets. In this sense, winning enables increased time to be entertained in the gambling activity eg; a person buys \$50 worth of gaming machine credits or units at the TAB. Upon winning the credits/units, this would enable the continued entertainment of playing the code involved.

Could State Government coffers cope with this radical suggestion?

The point is what many people buy is time on the machine or time playing the horses. Working with problem gamblers informs us that most people who go on to develop harmful excessive patterns of gambling rarely ever view their participation in this way until presented with this scenario in counselling or in group discussion.

The typical presentation of gambling from a Industry perspective is “as a form of entertainment”.

It is argued that while aspects of gambling are clearly entertaining, the term serves to sanitise the reality that gambling is marketed largely as “enter - gain - meant”.

As an Industry basically operating in the “hope” business, strenuous efforts to outlaw depictions of the delivery of unrealistic gains in promotion of gambling products needs to be enforced.

The industry in our view is very damaging to communities by depleting resources that otherwise may have been used for essential goods and services as well as diverting consumption away from industries that give more back to communities. The employment multiplier effects based on this consumption is estimated to be almost zero. The trend towards electronic mediums of wagering depletes employment opportunities as the service provider is a machine or terminal. With the trend also towards asocial forms of gambling, people are encouraged to be isolated when gambling. This contributes to clandestine behaviours developing.

Aspects of industry behaviour are clearly intrusive to the wishes of local ATSI communities. The Nundroo Licensing application is an example of a proprietor seeking economic returns which would have clearly pushed the responsibility of supporting insolvent community members back onto the local ATSI people. Despite Licensing Court rulings denying the application, it is our understanding the proprietor is interested in pursuing another application. Marla is another area currently seeking an application.

It is asserted that this industry requires a special amount of regulation and control and communities need to be enabled to set the pace, mix and define the major beneficiaries of gambling at a local level.

## **The Institutional Context**

### **Regulation**

It is asserted that the industry emphasis on selling notions of acquisition of a good rather than consumption of a service significantly contributes to the development of erroneous beliefs and expectations in consumers resulting in over commitment in expenditure. It is felt that this factor leads to the depletion of resources required for essential goods and services as well as long term security, as it presents a picture to the consumer that it in fact may materialise superior purchasing power.

It is also argued that the gambling industry has a very sophisticated knowledge of environmental design of venues and the ability to program certain games to achieve

outcomes that result in people investing to the point of personal and subsequently interpersonal damage.

Examples of this include the fact that most if not all gaming rooms and Casinos are devoid of clocks, windows and a clear sense of exit. It is felt that this occurrence is far to universal for it to be nothing short of a manipulation of environmental cues to induce deficiencies in the environment that contribute too, rather than responsibly seek to minimise harm to the consumer.

Another example is encouraging consumers to count outcomes that have no effect at all on outcome eg screens with the fall of numbers on roulette wheels. Given each spin is completely independent of the previous one, monitoring outcome is erroneous. If a consumer wants to record the fall of cards when playing blackjack(21), they will be told this is illegal?

It is thought that reinforcement scheduling of gaming machines in both sounds used and depictions of combinations of images on the screen, strategically instil a sense that "the win is not far away" (near miss phenomenon), which contributes to the mind set that it would be "foolish to walk away now".

The use of sound is denied by the Industry as significant in this process. If this is the case then why not have sound omitted. If this was deemed to render the game unattractive because people enjoy the sounds - then supply gaming machines with ear phones to inhibit the sounds of other machines acting as reinforcement cues to other people gambling.

It is a recommendation that this issue be clarified through independent investigation. If it is found that programmers design products in this way the necessary modifications need to be made.

We are aware of gaming machine tournaments that upon reports seem to be educating people to play credits in maximum rates at a very rapid pace. This is apparently suggested as a way of winning these tournaments. The strategic placement of these types of events on pension and other Government benefit receipt days also raises some questions about the industries commitment to minimising harm.

It is further recommended that: If industry practices are found to strategically target people on low incomes or people experiencing transitional or chronic psycho-social problems, these practices be outlawed with accompanying resources to enforce compliance from a regulatory statutory body.

This submission recommends investigation into the question: Is the industry misusing psychological principles of behaviour modification through sophisticated technology and serving practices to manipulate consumer expectations and behaviour? If found to be the case, it is strongly recommended that these practices be outlawed in legislation and adequate penalties enforced to curb these practices

Without constraints being placed on activities that target economically and socially vulnerable people, the community will continue to carry the opportunity cost incurred. These practices need to be specifically identified and curtailed through regulation.

Active misuse of social psychology to instil a sense of intimacy with people also requires attention. Much of this submission has focused upon the monetary aspects of gambling. Gambling venues also offer people an alternative from the trials and tribulations of everyday life, in an atmosphere of luxury. A percentage of people who develop problem with gambling are socially isolated. It is the role of government and community to ensure there exists an adequate mix of alternative social and interactive opportunities.

It is widely accepted that the more continuous the form of gambling the more likely the likelihood of staying engaged and the more likely patterns of attachment form with these codes. This may be one explanation why electronic gaming machine gambling is so over represented in profiles of presenting problem for people with gambling related concerns accessing services.

Community members report the manner in which horse race gambling has changed over the recent years to enable punters to bet across Australia very few minutes. Many people say this has increased their gambling expenditure giving further support to the relationship between continuous opportunity, the more likely people stay engaged, the more likely more money is spent.

Alcohol has it's own story in the ATSI community. Alcohol is linked to past enshrined policies of privilege and is well documented as a clear correlate to personal and community pain.

It has been reported that is not uncommon for the gambling Industry to accept wagers from people in obvious states of cognitive impairment as a result of excessive alcohol consumption. Stories have also been relayed of some unscrupulous operators strategically using alcohol to prime people to reach a state of impairment when gambling. Any substantiated incidents of this nature should evoke an immediate cancellation of the licence. Again resources are required to assist monitoring of compliance to this expectation.

The enmeshment of alcohol and gambling opportunities under the same roof seems to be a trend far more common today than ever before. PUB/TABS are far more common than stand alone agencies in South Australia. Gaming machine licences are always linked to licensed premises, preventing the setting up of alcohol free venues. Any steps to minimise the opportunity to consume alcohol and gambling in the same venue is supported as a step to minimise associated harm.

Another story, shining light on inadequacies in standing regulation involves a situation relayed to this service of an Aboriginal person who upon winning a substantial number of credits on a gaming machine was told by the publican that the machine was faulty. The person accepted this response as accurate. The person was not informed of any right to have this claim verified by a third party. The person was from a rural area and could only be described as a very passive polite person who would not in this situation question the authority of the publican.

Upon following this matter up with the Office of The Liquor & Gaming Commission in South Australia, it would seem that the onus is on the player to make a complaint rather than the publican enforced to supply a receipt for the credits and call for a third

party to investigate the publicans claims. The consumer in this situation relies upon the goodwill of the operator to inform the person of the right of review.

It is recommended that the onus or burden of proof needs to be reversed and adequate steps taken to inform consumers of their rights in law as well as venues being mandated to post this information in prominent locations in a culturally consistent format reflecting the patronage of the venue.

It is argued that the existence of these largely self regulated business practices, will continue to disadvantage consumers and the wider community because these practices contribute to, rather than contain irresponsible gambling delivery practices.

State governments are noted as being reliant upon gambling revenue to meet budget forecasts. This submission supports the sole use of gambling expenditure into social/welfare spending. Mechanisms to address the conflict of interest existing for Government as a beneficiary of gambling activity also needs to be considered.

### **Who Gambles and Why ?**

Since the widespread shift towards a deregulated gambling industry a number of prevalence studies have been commissioned to assist in answering the above question. ATSI people and ATSI related issues are largely rendered invisible in much of this social inquiry commissioned to date.

In November 1996 an extensive telephone poll (1208 respondents) was commissioned by the Gamblers Rehabilitation Strategy in South Australia to answer many of the questions concerning the who and why and prevalence of problems associated. ATSI people are not differentiated in the sampling.

In September 1998 The Honourable Dean Brown (Minister for Human Services in South Australia), was forwarded a request to progress a prevalence study focusing on ATSI gambling and consequent issues in South Australia. The request also asks for the incorporation of focus on ATSI community determined definitions and possible ways forward to reduce resulting harm. We await the decision of the Minister on this request.

It is noted that our literature searches reveal only one study which specifically focuses upon ATSI gambling in a contemporary sense. This is the study commissioned by the Queensland Government Department of Families, Youth and Community Care - "Long Term Study into the Social Impact of Gaming Machines in Queensland : An Issues Paper: The Social and Economic Impact of Gaming Machines on Aboriginal and Torres Strait Islander Communities in Queensland"(February 1995). The report also makes reference to the impact of the installation of a PUB/TAB by the Yarrabah Council.

The only other substantive research we are aware of is work currently being progressed regarding ATSI gambling in the Northern Territory by Professor Jan McMillen. We understand this work is almost complete.

There exists a role for more Federal involvement in progressing, funding and co-ordination of this type of social inquiry to enable a greater capacity to develop knowledge's to reduce problems stemming from gambling in ATSI populations.

Information that has been shared by people consulted since the inception of this program suggests a patterns of ATSI community gambling largely demarcated along gender lines when engaged with industry business orientated gambling. A more equal ratio of involvement along gender lines exists in ATSI community operated gambling such as card games.

Prior to the introduction of gaming machines in South Australia TAB gambling has been very popular and continues to be popular with ATSI men. Bingo, bingo tickets and scratchies were more popular with ATSI women. Community card games is noted to have equal gender participation.

It is noted that while there has been some migration towards gaming machine gambling by ATSI men, the racing codes still account for the main form of gambling. ATSI women to a larger degree have moved and stayed with gaming machines as the preferred code.

While it is acknowledged that the introduction of gaming machines has created a degree of transition of pre-existing consumers of gambling within the community, it has come to attention of this service that some ATSI community members did not participate in gambling prior to the introduction of gaming machines. Some of these people are now regular players of gaming machines.

In the Queensland study, 29% of ATSI people gambling on the pokies reported that prior to their introduction in Queensland, they did not gamble at all. This statistic has not been adequately researched in this State.

Many ATSI people that have discussed community gambling with this service have stated that gambling (especially the newer forms of electronic gaming machines) is depleting the community of substantial sums of money and placing additional stress on an already highly pressured community. The general description of the reported patterns of play suggests patterns destructive to personal and community wellbeing. Again this has not been sufficiently researched to give any qualified information.

Borrowing from the information derived from the Queensland report it was found that the temporary installation of the PUB/TAB on the community led to community gambling patterns in excessive proportions. Almost 50% of the community indicated they were heavy or weekly players compared with general population studies indicating between 4-6% of people fit this category.

It is noted that this particular community is a very isolated community - \$140 round trip by taxi to the nearest TAB. It would be necessary to note the range of other activities possible on this community as well as a host of other variables before making too much comment on these findings. It raises issues for the specific impacts of institutional gambling in remote and isolated communities.

Part of the levy recommended within this submission could also be utilised to create resources to progress industry development and alternative leisure activities in communities starved of capital funds. This is would provide potential for sustainable



job creation, self reliance and re-empowerment. Again efforts to ensure that administration of the fund reflects and caters to local contexts and needs is critical.

## **Assessing the Social & Economic Costs and Benefits**

The research that has been conducted, small as it is, largely presents a picture of disruption to pre-existing nurturing patterns of ATSI community life as a result of the intrusion of gambling industry activity. Before outlining these patterns of intrusion it may be worth first contrasting business focused gambling to that of ATSI community focused gambling.

Community controlled gambling in a historic context has some relationship to overt defiance towards the paternalistic authorities saying gambling was not allowed. Prohibitive strategies are thus deemed to be ineffectual. ATSI community controlled gambling is noted to a large degree to utilise gambling activity as a vehicle to build social capital and redistribute this capital to community members who would otherwise be unable to achieve such capital accumulation. Goods purchased with the proceeds at times become socially utilised commodities. The majority of the money gambled is redistributed to the players.

The rules and protocols and to some degree profit sharing is a community responsibility. Literature on the subject of ATSI community gambling never refers to the profiteering phenomenon as critical or central to community gambling.

In a contemporary sense community gambling is described as being conducted largely in an atmosphere of and in the spirit of reciprocal social responsibility. Gambling also is used for the purposes of social interaction, to facilitate information exchange and to have fun as a group. The function of community pooling and distribution of limited fiscal resources remains important. This enables some community members the power to obtain additional purchasing power denied through entrenched insolvency.

Reference to protocols of conduct that actively discourages personal disadvantage are a prominent feature. This includes steps to prevent people playing if impaired by alcohol and steps to prohibit destitution and or disadvantage as a result of incurring losses. This is not to say that this form of gambling is free of negative impacts.

Contrasting the impact on the ATSI community when comparing ATSI community gambling to industry orientated gambling a different picture emerges. Profiteering forms the primary focus of business orientated gambling. These operations derive benefit from the misfortune of others to a small group or individual who is generally not part of the community. The rules and decisions about profits are not a shared community responsibility.

When people lack the control to handle profits/losses incurred the result of gambling the impact is far more reaching than a form of gambling that distributes the money in a circle with established protocols on withdrawal of community resources.

The Queensland research reported one outcome of the introduction of industry business orientated gambling was a reduction in local card game gambling. This would then by association lead to a reduction in community resources for the whole of the community.

The Gaming Machine Player Survey of (128) ATSI people living in Northern Queensland found that

- 93.5% of the population were on incomes below \$25,000/annum - (Queensland)
- ATSI people who gamble spend significantly more on all forms of gambling to that of non-ATSI people who gamble. On average 20% income.

It is noted that these expenditure patterns especially in light of minimal or non-existent household savings levels would have to lead to an inability to meet essential expenses such as food, rent, utilities, clothing, medicines and transport.

Recently in South Australia a local Aboriginal community waged an objection to the installation of a gaming machine licence at Nundroo, which is close to two ATSI communities. It was felt by the local ATSI people that the granting of this licence would result in undue hardship to local people.

The decision to reject the application was supported by both the Licensing Commissioner and upon subsequent appeal a Licensing Judge. This is not to say that the Licence applicant has no ability to continue to pursue new applications. This is a clear example of an industry participant being insensitive to the wishes of the local ATSI people and insensitivity to the realities of the projected harmful consequences of setting up such a business in this type of region.

It is recommended that the current process of licensing application, the requirements to consult local ATSI councils and the imposts on communities that wish to lodge objections needs to be investigated. If found to be deficient in processes that enable rather than obstruct local self determination, then adequate alternation of process be enacted.

Further, it seems utterly negligent and totally irresponsible to create avenues for increased gambling, when research indicates it will create a new consumer, without any experience of gambling (29% in the Queensland case) would will by implication have inadequate knowledge of potential risks. It is recommended that before progressing any new gambling opportunities in isolated regions, a series of community information / education strategies to enlighten people to the realities of gambling, the odds and how the machines work be delivered by recognised providers to assist in harm minimisation efforts. It is also recommended to impose a rehabilitative levy from the proceeds of local expenditure to advance local strategies to inhibit excessive patterns of gambling in the area where the expenditure is taking place.

### **Service Responses**

Reviewing the national strategic response by service planners to assist ATSI communities with gambling problems, it has to be said that the ATSI community is largely carrying the load itself. Much of the focus neglects the needs of ATSI people and South Australia to our knowledge is the only State or Territory with a specific ATSI funded program. Some BreakEven providers in other regions are making special efforts to reach local ATSI communities.

Mainstream approaches operating from non-Indigenous orientated organisations makes up the majority of effort progressed to date. This strategy is felt to be largely inappropriate to making meaningful inroads into retarding the current gambling associated problems.

ATSI specific focus in the promotion of local gambling services is rare and hardly existent. The abilities of staff and organisations to deliver culturally appropriate service to ATSI people is reported to be wanting. Mainstreaming also serves to alienate people from the process of self determination of gambling problems and being active in the implementation of solutions.

In addition to the proposed fund, it is recommended that there be an acknowledged onus on State/Territory gamblers rehabilitation funds, to fund ATSI orientated service providers to progress greater equity in this area. As part of this recommendation it is essential to involve ATSI representatives to contribute towards the formation of action plans and be part of the monitoring process of industry compliance to standards of industry practice intended to reduce problem gambling.

This service is the only one of it's kind we are aware of in existence across this nation. Upon talking to mainstream gambling rehabilitation program in other regions it would seem there is universal agreement on need for more strategic focus in this area into the future.

This service facilitated a workshop specifically focusing upon the issue of service delivery to ATSI communities across Australia at the gamblers practitioners conference sponsored by NAGS on the 19/11/98 in Adelaide. The vision for the establishment of a national network to collate information to assist local ATSI groups develop best practice in this area was discussed. Given this is a national project, some resources from the Federal sphere would be welcomed in advancing this type of proposal.

It is hoped this workshop will lead to the beginning of a process that ultimately will go on to ensure the issues of ATSI communities and gambling does not continue to be largely left of the table. It is asserted that the Federal government has a responsibility to support this type of initiative and we would hope this offer for partnership will not be ignored. Any assistance in enabling mechanisms to begin the process of pooling information of what is being trialed and implemented across this nation would be helpful.

## **Conclusion**

This submission has presented a picture of ATSI people and communities being adversely affected as a result of changes to the structure and mix of the gambling Industry within Australia.

A number of key recommendations have been made including the continued focus of resources to be dedicated to both uncover the impacts of this industry upon ATSI communities and to assist in enabling ATSI communities to redefine and reset the place of gambling in community life. Resources are also urgently required to deal with the consequent issues of the current interaction between ATSI and the gambling industry.

This submission also seeks the creation of a Federally administered fund to enable reasonable resources are available to ATSI communities, ATSI health services and others to enable a reversal of the current harm being incurred. Mechanisms to capture some of this money and rechannel the proceeds into local capital infrastructure projects that aim for increased social, employment and leisure activities is also highly recommended. It is felt this will serve to buffer people from an over reliance on gambling.

Local ATSI community involvement in both the determination and implementation of reversal strategies is seen as essential to ensure efficient and effective gains result.

## Summary of Recommendations

This submission recommends the creation of a Federally administered fund to enable reasonable resources be available to ATSI communities, Aboriginal controlled health services and others, to enable the development of culturally appropriate strategies to reverse the current harm being incurred. This fund would be resourced by a dedicated portion of the proceeds from the 10% GST on gambling expenditure. Alternatively an additional impost of 2% GST on gambling expenditure could be channelled specifically for the purposes defined herein. This fund would be in addition to and compliment State/Territory allocations for gambling rehabilitation strategies. Localised ATSI community involvement in both the determination and implementation of strategies to reverse the current trend is seen as essential to ensure efficient and effective gains.

In addition to the proposed fund, it is recommended that there be an acknowledged onus on State/Territory gamblers rehabilitation funds, to fund ATSI orientated service providers to progress greater equity in this area. As part of this recommendation it is essential to involve ATSI representatives to contribute towards the formation of action plans and be part of the monitoring process of industry compliance to standards of industry practice intended to reduce problem gambling.

It is a key recommendation that adequate resources be dedicated to uncover and redress dis-empowering impacts upon ATSI communities related to the gambling industry through Federally sponsored research grants. Built into these submissions needs to be adequate resources and a commitment to the advancement of mechanisms to enable ATSI communities to redefine and reset the place of gambling in community life coupled within the process of social inquiry.

The gambling industry be brought in to line with other Industry standards that ensures adequate consumer protection and consumer information of product characteristics. This includes the make up of the product, potential gains in a balanced truthful manner and information regarding all possible harm as consequence of consumption.

As an Industry basically operating in the "hope" business, strenuous efforts to outlaw depictions of the delivery of unrealistic gains in promotion of gambling products be enforced.

It is asserted that this industry requires a special amount of regulation and control and communities need to be enabled to set the pace, mix and define the major beneficiaries of gambling at a local level.

It is recommended that the current process of licensing application, the requirements to consult local ATSI councils and the imposts on communities that wish to lodge objections needs to be investigated. If found to be deficient in processes that enable rather than obstruct local self determination, then adequate alternation of process be enacted.

It is recommended that before progressing any new gambling opportunities in isolated regions, a series of community information / education strategies to enlighten people to the realities of gambling, the odds and how the machines work be delivered by

recognised providers to assist in harm minimisation efforts. It is also recommended to impose a rehabilitative levy from the proceeds of local expenditure to advance local strategies to inhibit excessive patterns of gambling in the area where the expenditure is taking place.

It is a recommendation that the notion that gaming machines are programmed in a fashion to strategically modify behaviour towards chasing losses be independently investigated. Further the impacts on reinforcement cues (especially sound) needs to be investigated. If it is found that programmers design products in a manner to support chasing or disassociation, the necessary modifications need to be made.

It is further recommended that: If industry practices are found to strategically target people on low incomes or people experiencing transitional or chronic psycho-social problems, these practices be outlawed with accompanying resources to enforce compliance from a regulatory statutory body.

Any strategic use of alcohol to prime people to reach a state of impairment when gambling result in immediate cancellation of the licence. Again resources are required to assist monitoring of compliance to this expectation. Additionally any steps to minimise the opportunity to consume alcohol and gambling in the same venue is supported as a step to minimise associated harm.

In the occurrence of a gaming machine being deemed to be faulty in relation to winnings, it is recommended that the onus or burden of proof needs to be on the operator and the determination of outcome be by an officer of the relevant licensing authority. Adequate steps need to be taken to inform consumers of their rights in law as well as venues being mandated to post this information in prominent locations in a culturally consistent format reflecting the patronage of the venue.

There exists a role for more Federal involvement in progressing, funding and co-ordination of social inquiry to enable a greater capacity to develop knowledge's to reduce problems stemming from gambling in ATSI populations.

Resources for the establishment of a national network to collate information to assist local ATSI groups develop best practice in this area be supported by the Federal government.