

# Responsible Gambling Mandatory Code of Practice for Tasmania

Submission to the 2022 Review

June 2022



*Working for a just Tasmania*

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# Executive summary

Anglicare Tasmania welcomes the opportunity to comment on the Review of the Responsible Gambling Mandatory Code of Practice (“the Code”). We agree with the Commission’s view that the Code’s provisions in relation to advertising, inducements and player loyalty programs will need to be stronger as the Tasmanian gambling industry moves to individual gaming machine licences.

Anglicare’s recommendations are informed by:

- Anglicare’s values
- the voices of people who have experienced gambling harm and the frontline workers who support them
- contemporary gambling research, which recommends a public health approach for preventing and minimising gambling harm
- alignment with the objectives of other Government policies
- economic analysis of the options proposed by the Commission.

The Code’s objective of minimising gambling harm requires a move away from “responsible gambling” and “problem gambling” terminology to an evidence-based public health approach to gambling harm prevention and minimisation with messaging that provides accurate and specific information about risk and harm. This approach is supported by research evidence and by consultation with professionals working to reduce gambling harm in Tasmania.

Consultation with stakeholders with direct experience of gambling harm in Tasmania provided clear evidence that other areas of the Code, particularly those requiring intervention by venue staff, are not being implemented as intended and that this is resulting in significant gambling harm. The Commission should complete a review of the rest of the Code before the new industry arrangements commence on 1 July 2023.

# Recommendations

## Advertising and advertising standards

1. All advertising of gambling products should be prohibited, including (but not limited to):
  - a. all outdoor signage/displays advertising or promoting gaming machines
  - b. advertising or marketing of gambling in connection with sporting broadcasts during times when children are likely to be viewing, whether free to air, subscription, or online
  - c. advertising or marketing of gambling products via applications or electronic games classified as G
  - d. sponsorship or branding of children's sporting competitions by gambling operators
  - e. sponsorship or branding of sporting competitions by gambling operators, including endorsements or sponsorship of players (to be phased out over a reasonable period).
2. Establishing a gambling account with associated pre-commitment limits should require formal identification and proof of age.
3. The Code, the Advertising Standards and other relevant documents should have the stated objective of preventing and minimising gambling harm without reference to "responsible gambling". The objectives of the *Gaming Control Act 1993* should include prevention and minimisation of gambling harm.
4. The Code, Advertising Standards and any relevant documents should be updated to remove references to "gambling responsibly" and "responsible gambling" and replaced with messaging about gambling harm prevention and minimisation to reflect an evidence-based, public health approach. This should include updating the title of the Code.
5. The Code, Advertising Standards and any relevant documents should be updated to remove references to "problem gamblers", "problem gambling" and "adverse impacts" and replaced by the concept of gambling harm. The population affected should be referred to as those harmed by gambling.

6. Social marketing, promotional materials, and campaigns to reduce gambling harm should refrain from using terminology such as “responsible gambling” or “problem gambler” and avoid messages focused on individual behaviour. Messaging should focus on advice about how and where to seek assistance, accurate advice about the price and risks of gambling, and encourage the uptake of tools and techniques to monitor gambling activity and avoid, prevent or minimise harm.
7. Mandatory warning signs and messages required by the Advertising Standards should refrain from use of the terms “responsible gambling” and “problem gambling”, in favour of evidence-based messages about the harms of gambling and the risks of experiencing those (for example, gambling is associated increased risk of health problems, separation, divorce, financial difficulty).

### **Inducements and player loyalty programs**

8. Prohibit venue operators from offering free vouchers (or tokens and the like) and rewards points to be used for gambling purposes or for any purpose that may result in gambling harm.

### **Other measures for minimising harm in a competitive environment**

9. Introduce universal registration and pre-commitment for EGMs.
10. Consider introducing a cap on the number of EGM venues or total number of EGMs permitted in a single suburb.
11. Establish limits for the hours in which EGMs can operate that apply to all venues other than casinos (for example, EGMs are not permitted to operate between 2am and 10 am each day).
12. Gambling venues should not be permitted to open when the only part of the premises trading is the gambling area.
13. Gambling areas should be physically separated from areas where food and beverages are served and consumed.
14. EGMs (and other gambling products identified as particularly harmful) should be subject to appropriate levels of progressive taxation to limit incentives for venues to pursue higher profits from EGMs.
15. Review sections of the Code outside of the scope of this review in order to ensure its effective implementation to minimise gambling harm. The review should be completed, in consultation with stakeholders with first-hand knowledge of gambling harm in Tasmania, prior to 1 July 2023.

# About Anglicare Tasmania

Anglicare Tasmania is a large community service organisation in Tasmania with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport, Burnie, Sorell and Zeehan and a range of programs in rural areas. Anglicare Tasmania's services include: crisis, short-term and long-term accommodation support; NDIS disability and mental health support services; support services following a motor vehicle accident; aged and home care services; alcohol and other drug services; financial and gambling counselling; and family support. In addition, Anglicare Tasmania's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

Anglicare Tasmania is committed to achieving social justice for all Tasmanians. It is our mission to speak out against poverty and injustice and offer decision-makers alternative solutions to help build a more just society. We provide opportunities for people in need to reach their full potential through our services, research and advocacy.

Anglicare Tasmania's work is guided by a set of values which includes these beliefs:

- that each person is valuable and deserves to be treated with respect and dignity;
- that each person has the capacity to make and to bear the responsibility for choices and decisions about their life;
- that support should be available to all who need it; and
- that every person can live life abundantly.

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# 1 Introduction

Anglicare Tasmania welcomes the opportunity to comment on the Review of the Responsible Gambling Mandatory Code of Practice (“the Code”). We consider it timely in light of the upcoming changes to the gaming industry in Tasmania and we support the Commission’s stated intention to take a ‘proactive approach’ to ensuring these changes do not cause further harm to Tasmanian gamblers, their families and the wider community. We agree that a more competitive gaming industry presents challenges related to gambling advertising, inducements and player loyalty programs, and welcome the Commission’s scrutiny of these aspects of the Code.

However, Anglicare has identified the need to review other areas of the Code in addition to the issues raised in the Commission’s Stakeholder Consultation Paper (TLGC 2022). Therefore, this submission will also provide broader feedback and recommendations to improve the effectiveness of the Code in reducing gambling harm.

In preparing this submission, Anglicare has consulted directly with people affected by gambling harm and professionals who support them. Their input is critical to understanding and minimising harm from gambling, in order to achieve the objectives of the Code.

## 2 General considerations

Anglicare Tasmania recognises that the agency of the individual is an important part of achieving fullness of life, including agency to decide how to spend one’s money and time. Individual agency and dignity, however, does not translate into an intrinsic right to generate profit from an activity that causes harm. Gambling is an activity that causes harm and is addictive for some people.

To achieve a balance between the choice of individuals and regulation of the gambling industry, we will consider:

- the Tasmanian policy context and Government policy objectives
- basis of government regulation of gambling
- prioritising harm minimisation.

## 2.1 The Tasmanian policy context and Government policy objectives

Gambling regulation should be considered in the context of broader policy objectives, including complex issues that have been identified as significant to the Tasmanian community. These include issues of mental health, suicide prevention, family and domestic violence, child and youth safety and wellbeing, cost of living pressures, disadvantage, and housing affordability.

Ensuring that Government is not simultaneously investing in programs with directly conflicting objectives is fundamental to responsible financial management.

Anglicare Tasmania acknowledges current and significant Tasmanian Government initiatives aimed at:

- improving mental and physical health, including reducing harm from alcohol and other drug use and preventing suicide
- preventing domestic and intimate partner violence, such as the *Family and Sexual Violence Action Plan*
- improving child safety and development, through the *Child and Youth Wellbeing Strategy* and initiatives such as *Strong Families, Safe Kids*
- improving educational outcomes and equity for Tasmanians, for example through the *Digital Ready for Daily Life* program
- increasing employment including investment in local job hubs
- addressing homelessness and increasing housing affordability with significant investment in new social housing
- addressing disadvantage, poverty, and the cost of living pressures, for example by building capacity in the community sector and through the No Interest Loan Scheme.

These initiatives address complex issues with multifactorial and often poorly understood causation. Government investment across these initiatives is in the order of billions of dollars and reflects the need for a systems approach to reducing adverse impacts and harm and promoting wellbeing and public health.

The Fifth Social and Economic Impact Study of Gambling in Tasmania (O'Neill et al. 2021) identified a range of harms resulting from gambling, reproduced in Table 1 overleaf. These harms, which are divided into impacts on the person gambling and impacts on others, oppose achievement of the goals of the policy initiatives listed above. Minimising these harms should be an objective of gambling regulation and reflected in legislation.



Table 1 Forms of harm from gambling (adapted from O'Neill et al. 2021)

Impacts on person gambling	Impacts on others
<b>Financial impacts</b>	
Reduced savings/assets	Reduced household savings/assets
Reduced spending on other goods and services	Reduced household spending on other goods and services
Increased debt	Increased household debt
Bankruptcy	Bankruptcy of family members; potential impact for joint assets
<b>Social and psychological impacts</b>	
Obsessive thoughts/feelings	Lack of engagement from significant other/parent/child
Lack of engagement with others	Lost time to spend with significant other/family member/friends/community
Lost time to spend with significant other/family members/friends/community	Impacts on dependent children from lack of parental engagement
	Neglect/abuse of dependent children
Divorce (financial and emotional costs)	Divorce (financial and emotional costs)
Stress/anxiety/depression	Treatment costs
Suicidal ideation	Impacts of suicidal ideation on family and friends
Suicide/self-harm	Emotional impacts of suicide/self-harm of family and friends
	Financial impacts of suicide/self-harm on family and friends
	Financial impacts of suicide/self-harm on community
<b>Impacts on physical health</b>	
Increase in sedentary behaviour due to time spent gambling	Increase in current health system costs
Reduced level of self-care	Long-term increase in health system costs
Increased health risks from co-morbid behaviours such as smoking and drinking	
Increased physical health risks from poor mental health	
Physical impacts of self-harm	Physical impacts of intimate partner violence
Physical impacts of intimate partner violence	Societal costs of premature impairment and mortality due to reduced health
Premature impairment and mortality due to reduced health	
<b>Reduced productivity at work or study</b>	
Lost time spent at work	Extra work to cover absences by work colleagues
Lost productivity at work	Reduced productivity of work colleagues
Lost employment/employment opportunities	Transaction costs of dismissal and finding new employee
Financial impacts of unemployment	Financial impacts of unemployment on household
	Increased social security costs
Reduction in lifetime earnings	Reduction in overall economic activity
Impacts of unemployment on mental and physical wellbeing	Impacts of family member's unemployment on mental and physical wellbeing
	Increased healthcare costs due to reduction in wellbeing caused by unemployment
<b>Cultural harm</b>	
Reduced engagement in cultural rituals	Reduced contribution to community
Culturally based shame in relation to inability to meet cultural roles and expectations	
Reduced connection to community	

Impacts on person gambling	Impacts on others
<b>Crime and justice system costs</b>	
Financial crime	Financial cost to business owner Impact on workplace colleagues Cost of police investigation
Legal defence costs	Prosecution costs Court costs
Imprisonment	Lost access to significant other/family member/friend due to incarceration
Reduced lifetime income due to imprisonment	Cost to community of detention
<b>Treatment and community support costs</b>	
	Cost of gambler help services Cost of self-exclusion services

## 2.2 Basis of government regulation of gambling

In addition to ensuring alignment of Government objectives, there are a number of reasons justifying government intervention in the market for gambling products:

- Imperfect information and/or information imbalance - the gambling operator has vastly more information about the odds and fairness of a gambling product than the person gambling.
- Negative externalities - these are the harm and costs to dependents, family, friends and the broader community, including those listed in column 2 of Table 1.
- It cannot be assumed that all decisions to gamble are rational due to the potentially addictive qualities of the product and the vulnerability of some people to gambling harm.

Imperfect information is the primary basis for regulating gambling through legislation to ensure that the conduct of gambling is not fraudulent (for example, selling tickets to a raffle that is never drawn).

However, even when criminal and fraudulent gambling operations are prevented, imperfect information (information imbalance) results in unacceptable and preventable gambling harm. Gambling operators generally have far greater knowledge and understanding of the odds and, in the case of electronic gaming machines (EGMs), can actually control and set them over the long run. In addition to this, the EGM operator has complete control over a range of factors that influence the gambling experience and propensity to continue gambling.

In effect, gambling decisions are not a "level playing field" for gambling operators ("industry") and the people who gamble. Research and consultation with stakeholders suggests that current measures to level the information playing field are inadequate. This is discussed further in section 4.1.

Negative externalities – the harm caused to other people and the broader community – are partially addressed through taxation measures imposed on gambling operators. This revenue is distributed back to the broader community through funding of sport, community projects and research. The authors of the SEIS note that the harmful impacts of gambling are not fully quantified and the cost is likely to be underestimated (O’Neill et al. 2021, p.107). The net economic impact of gambling in Tasmania is estimated to fall somewhere between a net cost of -\$36.3 million and a net benefit of \$158.9 million (O’Neill et al. 2021).

Leaving aside any discussion of the quantification of the costs and benefits identified, this approach does not:

- account for the harmful redistribution effect of gambling which increases disadvantage and is not necessarily addressed by the allocation of funding by LGA
- account for the disproportionate harmful impact on people on lower incomes and with co-morbidities
- adequately prevent or “undo” specific harms that occur as a result of gambling. This is particularly problematic in the context of the Government’s broader policy objectives outlined in section 2.1 which can only be achieved by seeking to minimise gambling harm.

### 2.3 Informing harm minimisation

The stated purpose of developing the Code is ‘...to minimise harm from gambling in the Tasmanian community and ... to make gambling environments safer’ (TLGC 2020). A harm minimisation approach should be primarily informed by:

- the views of people experiencing gambling harm in Tasmania and the professionals supporting them
- relevant, independent, quality gambling research.

This submission draws primarily on these two sources.

Anglicare believes that the objectives of government intervention should be informed by a public health approach to minimising gambling harm.

There are some underlying findings that should inform harm minimisation strategies and the review of the Code:

- Harm is not confined to “problem gamblers” and there is no specific point on the Problem Gambling Severity Index (PGSI) dividing gamblers who experience harm from gamblers who do not.
- People’s vulnerability to gambling and risk of harm is not constant and may vary over time and with life circumstances.
- While it is acknowledged that people classified with a PGSI score of 8+ and classified as “high risk” are more likely to experience serious harms, most people experiencing gambling harm are not in this category (Productivity Commission 2010, p.19).
- References to “responsible gambling” and classification of people into “responsible gamblers” and “problem gamblers” is likely to be an obstacle to reducing gambling harm.

The level of gambling harm is determined by a range of factors including:

- the type of gambling available
- accessibility and availability of gambling known to be harmful
- promotion of gambling and its effectiveness
- the vulnerability of the patron (which is not necessarily fixed and may vary with time and life circumstances).

The Code recognises that not all gambling products are the same and that products such as EGMs and online sports betting are associated with higher levels of harm.

### 3 Consultation undertaken

In May/June 2022, Anglicare Tasmania and TasCOSS jointly consulted stakeholders, seeking their input in relation to the issues raised in the Commission’s Stakeholder Consultation Paper (TLGC 2022) as well as the Code’s broader effectiveness in reducing gambling harm. This joint consultation particularly sought comment from Tasmanians experiencing gambling harm and the professionals who support them.

Representatives of over 35 organisations in the community services sector, government and academia were invited to participate in an online discussion forum on Monday 6 June 2022 and to complete an anonymous online survey, open from 31 May until 13 June

2022. These organisations also invited clients who had gambled or had experienced gambling harm to complete the survey.

Organisations represented at the forum included TasCOSS, Anglicare Tasmania, the Salvation Army, Glenorchy City Council, Women's Health Tasmania and Uniting Care. A recording of the forum was made available to all invitees and organisations were encouraged to provide input through the survey if they were unable to attend the consultation forum.

In the two weeks in which the survey was open, 48 people visited the survey, of whom:

- 2 people exited without answering any questions relating to the Code and have been excluded from the results
- 2 respondents provided input on a single issue
- 44 respondents provided responses on most, if not all, issues canvassed.

Of the 46 respondents, 14 (30%) indicated they had gambled in Tasmania in the last five years. Twelve respondents (26%) indicated that they had been harmed by their own or someone else's gambling. Twenty-five respondents (54%) worked to support people who have been harmed by gambling. This is likely to represent a significant proportion of professionals in Tasmania working specifically with people who have experienced or are experiencing harm from gambling. A small number of respondents belonged to more than one category.

Responses to questions were consistent across all groups with strong consensus on most issues.

Details of the survey design, questions and responses are provided in Appendix 1.

## 4 Stakeholder Consultation Paper

The Commission's review commenced with an independent desktop review undertaken by Stenning and Associates (the "Stenning Report"). The Stenning Report (2022) identified risks of increased gambling harm and threats to business viability due to the anticipated increase in competitive behaviour with the introduction of individual licensing of electronic gaming machine venues on 1 July 2023.

As a result, the scope of the consultation by the Commission has been restricted to consideration of the sections of the Code relating to advertising, inducements and player

loyalty programs. These three areas of the Code all relate to promotions by industry for the purpose of attracting patrons to their venue and directly or indirectly increasing gambling revenue. They will be collectively referred to as “promotions” in this submission.

Many of the objectives, harms, impacts, costs and benefits of promotions are shared. They all involve an additional cost to the business which it anticipates will be exceeded by benefits from additional gambling expenditure or avoiding of loss of market share.

## 4.1 Advertising

‘Advertisement is everywhere, social media and television. This has a big impact on people’s decision-making, and it is easily accessible.’

Gambling survey respondent

The Consultation Paper (TLGC 2022) seeks specific feedback from stakeholders on two options to limit outdoor advertising of gaming machines. The paper requests consideration of costs and benefits of the two alternatives and the impact on children and other vulnerable people. The Commission also indicated that it is looking to undertake a broader review of the Advertising Standards (TLGC 2017) and supplementary Fact Sheet (TLGC n.d.) across all gambling areas.

This submission will discuss:

- impact of advertising on children and other vulnerable people
- costs and benefits of gambling advertising
- the appropriateness of existing advertising standards
- the preferred option for restricting outdoor advertising of EGMs
- broader changes to gambling advertising regulation.

### 4.1.1 Impact of advertising on children and other vulnerable people

The Code requires that gambling advertising is conducted in a manner that takes into account the potential adverse impact it can have on minors, people with gambling problems, people at risk of developing gambling problems and the community.

Section 2.3 outlines issues around clearly defining who is vulnerable to gambling harm. It needs to be recognised that while it may be possible to target advertising to people who are known to be vulnerable, it is near impossible to target advertising to ensure that it *does not* reach people who are vulnerable. One survey respondent highlighted this issue in relation to advertising, stating:

'We don't know who is vulnerable from one day to the next. Some folk may always be vulnerable but for many others, their vulnerability may come as a result of a situation that they are facing. This could be anyone anywhere and we certainly do not want advertising to target their vulnerability.'

A recently published Norwegian study by Syvertson et al. (2022) examined the relationship between exposure to different advertising types and impact from gambling advertising, broken down by gambling risk/problem gambling. Advertising impact was defined as perceived changes in gambling involvement, awareness towards gambling, or knowledge about gambling forms and operators because of gambling advertisement. The study analysed large scale data from a 2019 general population survey.

The study found a statistically significant positive association between gambling risk/problem gambling and higher impact from gambling advertising. This confirmed the findings of previous studies, which suggest that people who experience higher levels of gambling harm are more responsive/vulnerable to gambling advertising.

Feedback from Tasmanians who have experienced gambling harm aligns with this finding, with advertising identified as influential 'if you are in a financial crisis and looking at making money fast or trying to increase your revenue'.

A number of gambling support workers provided insights to the impact of advertising on people who are trying to reduce the gambling harm that they experience:

'Trying to stop or cut down on gambling is made worse by advertising. I would describe it as similar to trying to quit smoking and seeing advertisements for tobacco everywhere.'

'For some people that I have worked with they are in a constant battle to distract themselves. Advertising makes this much harder.'

The Norwegian study also identified online advertising and direct advertising as particularly problematic (Syverston et al. 2022). These types of advertising more intensely target recognised vulnerable groups (e.g. young people, people at high risk of gambling harm) and resulted in greater gambling involvement (Syverston et al. 2022). Young men report that 'sports betting advertising targets their lifestyle and identity, with a messaging that normalizes gambling involvement' (Syverston et al. 2022). These findings were echoed in issues raised by stakeholders at the forum and through the survey and their suggestions for change are included in section 4.1.5.

#### **4.1.2 Costs and benefits of advertising**

The findings by Syverston et al. (2022) imply that if advertising results in increased gambling expenditure, the increase in expenditure will disproportionately come from higher risk gamblers. These gamblers will experience diminishing marginal returns and so consumer surplus per dollar spent will be relatively low and falling. At the same time the harm resulting from each additional dollar gambled will be relatively high. Under these conditions it is likely that the ratio of benefits to costs of additional gambling resulting from advertising will be at the lower end of the range estimate in the SEIS and likely to impose a net cost.

In section 2.1, information imbalance was identified as a significant market failure. As the objective of industry advertising is to increase gambling revenue, it is reasonable to suggest that gambling advertising will, on balance, increase information imbalance, even with the inclusion of statutory warnings. This is likely to increase gambling harm and impose a significant cost to the community.

Stakeholders consulted also expressed concerns about information imbalance, including:

'It glorifies gambling and does not give a full overview of the damage it causes.'

'I believe that the current gambling promotions focus on the behaviour as being "social" is flawed. It gives the illusion that gambling is a fine social experience. It does not focus on the out of social escalation where harm is also present.'

In a competitive environment where some gambling operators advertise intensively, remaining gambling operators may have to invest in advertising in order to minimise their loss of market share. If they fail to increase gambling expenditure to offset the cost of advertising, unrestricted advertising may result in a net cost to those businesses and affect their viability.

Restrictions to advertising are not anticipated to have a significant negative impact on consumer surplus. Gambling operations avoid the costs of advertising which, for some smaller operators, may be avoidance of a net cost.

Anglicare believes that, in the absence of clear evidence to the contrary, gambling advertising is likely to result in a net cost to the Tasmanian community.

#### **4.1.3 The appropriateness of the existing advertising standards**

Tasmania's Advertising Standards (TLGC 2017) require that advertising featuring gambling products or services must contain a standalone responsible gambling message,



for example “Gamble Responsibly”, and the name and telephone number for the Gambling Helpline (currently “Gamblers Help 1800 858 858”). This requirement applies to TV, radio, print and online advertising as well as vouchers, email marketing and promotional merchandise.

A study by Marko et al. (2022) found that personal responsibility framings in industry and government messaging strategies influence gamblers’ perceptions of gambling harm. The authors argue that this framing ‘reduces perception of gambling risk, increases perception of control, increases stigma and moralization of harm, and deflects from broader community perceptions of the causes of gambling harm’ (Marko et al. 2022). They recommend refocusing public communication strategies away from “responsible gambling” messaging, and towards evidence-based approaches, as part of addressing the harms associated with gambling.

This view is supported by Livingstone et al. (2019), who state that:

‘Stigma has been significantly reinforced via the individualising and frequently pathologising discourses of “responsible gambling” and “problem gambling”. Overcoming these will allow more rapid development of public health focused population health methods for gambling harm prevention and minimisation.’

A significant number of stakeholders consulted similarly identified the focus on “responsible gambling” and references to “problem gambling” in the Code and advertising as problematic. A key concern was stigmatisation that prevents people from seeking help.

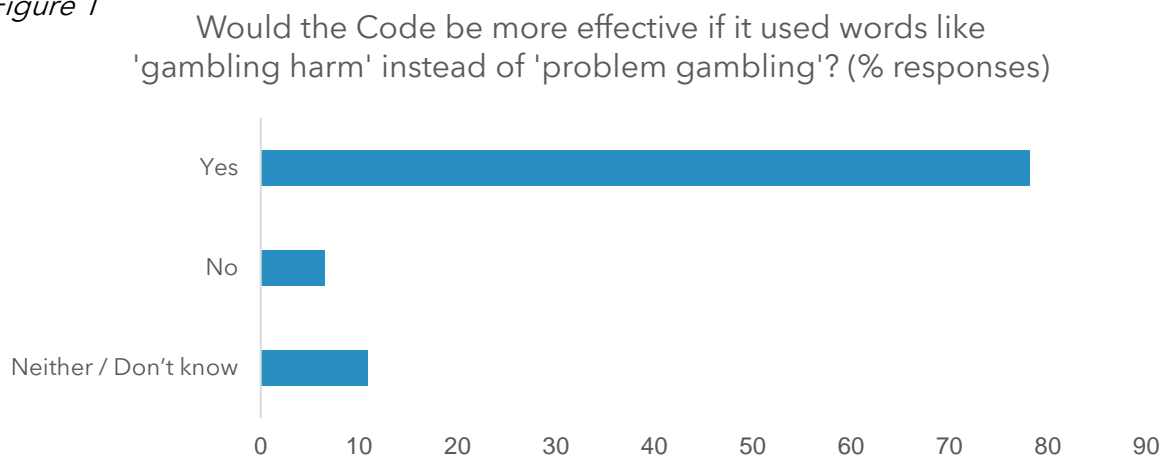
In line with the findings by Marko et al (2022), reasons given by stakeholders for avoiding terms like “problem gambler” included:

- identifying the gambler as being responsible for gambling harm is, in itself, harmful: ‘Being a problem gambler makes the person the problem not the gambling - harm from gambling makes gambling the issue not the person’
- the focus on personal responsibility mitigates against achieving desired outcomes: ‘The goal is to focus on the outcome (the harm that gambling causes) not suggest that the “problem” is the individual not being able to manage a “safe” level of gambling.’
- failure of people experiencing gambling harm to identify as problem gamblers: ‘a lot of people will fail to identify what problem gambling is; many will say “I don’t have a problem” even when multiple facets of their lives are being impacted by their gambling issues’

- harm is not confined to high-risk gambling: 'most gambling causes harm on some level'
- it prevents people from seeking help: 'people don't like being labelled as a problem it reduces the chances that they will seek help.'

In particular, there was strong support for replacing references to "problem gambling" with "gambling harm" with 78.9% of survey respondents believing that it would make the Code more effective (see Figure 1 below).

Figure 1



Livingstone et al. (2019) recommend a number of measures to reframe these discourses, which they identify as high priority and relatively easy to implement, including:

'Social marketing, promotional materials, and campaigns to reduce gambling harms should refrain from using terminology such as "responsible gambling" or "problem gambler" and avoid messages focused on individual behaviour. Messaging should focus on advice about how and where to seek assistance, accurate advice about the price and risks of gambling, and encourage the uptake of tools and techniques to monitor gambling activity and avoid, prevent or minimise harm.'

It is clear from the content of the advertising standards that the effectiveness of information to players is a key consideration in relation to advertising.

In response to a question about how information to players could be changed to reduce gambling harm, a number of survey respondents identified changes that are relevant to advertising:

'The downside of gambling and the losses should be more regularly advertised rather than the wins, as these are way less frequent than the losses.'

'more ads about self-exclusion: so many people don't even know it exists'

'Similar to smoke packaging machines could have regular warnings appear re the harm they are doing.'

'Maybe when you insert the first time it [the EGM] speaks to you about gambling support'

[There should be] 'more outrageous explanation of odds (more chance of being hit by lightning, in a submarine, twice).'

#### 4.1.4 The preferred option for restricting outdoor advertising of EGMs

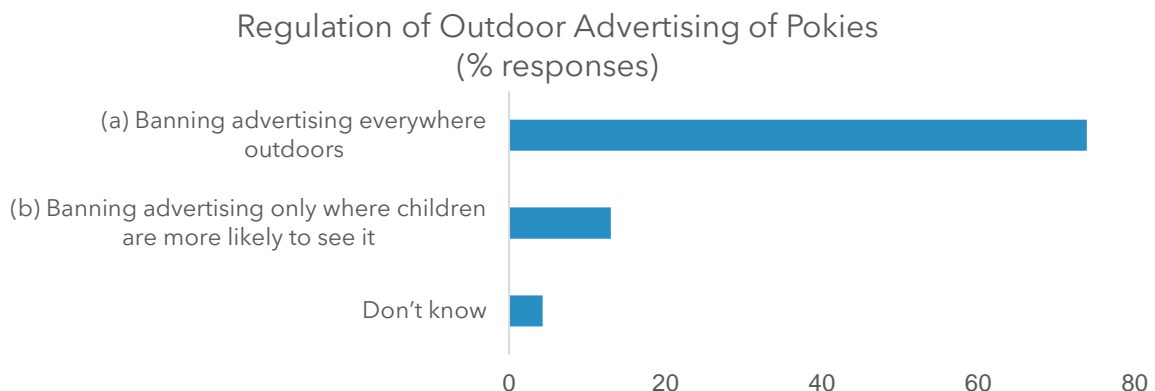
The Commission is seeking feedback on the following options for restricting outdoor advertising of electronic gaming machines.

- a) Ban all outdoor signage/displays advertising or promoting gaming machines.
- b) Limit the ban on outdoor signage/displays advertising or promoting gaming activities within proximity of where children frequently gather, for example, near schools, child care centres, bus stops/shelters.

Option (a) clearly meets the current requirement of the Code more comprehensively than option (b), which appears to only take into account potential adverse impacts on minors. Based on the discussion of cost benefit, the broader advertising restrictions of option (a) is likely to yield a net benefit compared to option (b).

Stakeholders consulted by Anglicare and TasCOSS also showed a clear preference for banning all outdoor advertising with 73.9% of survey respondents supporting option (a), as shown in Figure 2.

Figure 2



#### 4.1.5 Broader advertising restrictions

At the consultation forum, a number of stakeholders supported a ban on all advertising of EGMs.

'There will be a desire I think to extend the advertising boundaries further in the new regime environment, and so I think in an abundance of caution, a complete ban avoids any kind of confusion or uncertainty, and provides a competitively neutral market, which is hopefully what will reduce the harm from problem gambling.'

Although the survey did not specifically ask whether gambling advertising should be banned, seven survey respondents called for a total ban on gambling advertising and/or questioned why there was any gambling advertising at all.

'There should be a blanket ban on advertising ... we do not know which people are most at risk of harm from gambling ... vulnerability crosses all boundaries at some time or other - geographic, social, economic. We don't know what is going on in people's lives, and they are more likely to be vulnerable when confronting a crisis; they do not need that vulnerability preyed upon by gambling advertising.'

'I think advertising should be banned altogether. It has the potential to harm so many of [sic] vulnerable Australians and the flow on effect it has on families.'

Other areas for changes to advertising to reduce gambling harm included:

- reducing advertisements during sports games, particularly for online gambling
- advertising regulation should be 'no different from other legal forms of age limited activities - drinking, smoking, sex work'
- gambling advertising online and on TV and radio
- advertising of gambling on electronic devices, noting that 'children have access to this'
- pictures of people affected by gambling
- in-game advertisements for children
- advertising the risks alongside the same promotional material

#### 4.1.6 Recommendations to reduce harm from gambling advertising

1. All advertising of gambling products should be prohibited, including (but not limited to):
  - a. all outdoor signage/displays advertising or promoting gaming machines
  - b. advertising or marketing of gambling in connection with sporting broadcasts during times when children are likely to be viewing, whether free to air, subscription, or online
  - c. advertising or marketing of gambling products via applications or electronic games classified as G
  - d. sponsorship or branding of children's sporting competitions by gambling operators
  - e. sponsorship or branding of sporting competitions by gambling operators, including endorsements or sponsorship of players (to be phased out over a reasonable period).
2. Establishing a gambling account with associated pre-commitment limits should require formal identification and proof of age.
3. The Code, the Advertising Standards and other relevant documents should have the stated objective of preventing and minimising gambling harm without reference to "responsible gambling". The objectives of the *Gaming Control Act 1993* should include prevention and minimisation of gambling harm.
4. The Code, Advertising Standards and any relevant documents should be updated to remove reference to "gambling responsibly" and "responsible gambling" and replaced with a messaging about gambling harm prevention and minimisation to reflect an evidence-based, public health approach. This should include updating the title of the Code.
5. The Code, Advertising Standards and any relevant documents should be updated to remove references to "problem gamblers", "problem gambling" and "adverse impacts" and replaced by the concept of gambling harm. The population affected should be referred to as those harmed by gambling.

6. Social marketing, promotional materials, and campaigns to reduce gambling harm should refrain from using terminology such as “responsible gambling” or “problem gambler” and avoid messages focused on individual behavior. Messaging should focus on advice about how and where to seek assistance, accurate advice about the price and risks of gambling, and encourage the uptake of tools and techniques to monitor gambling activity and avoid, prevent or minimise harm.
7. Mandatory warning signs and messages required by the Advertising Standards should refrain from use of the terms “responsible gambling” and “problem gambling”, in favour of evidence-based messages about the harms of gambling and the risks of experiencing those (for example, gambling is associated increased risk of health problems, separation, divorce, financial difficulty).

## 4.2 Inducements and player loyalty programs

The considerations that apply to advertising also largely apply to inducements and player loyalty programs. This view was supported by forum and survey feedback, with a number of respondents indicating that they see these promotions as having greater potential for resulting in gambling harm than advertising.

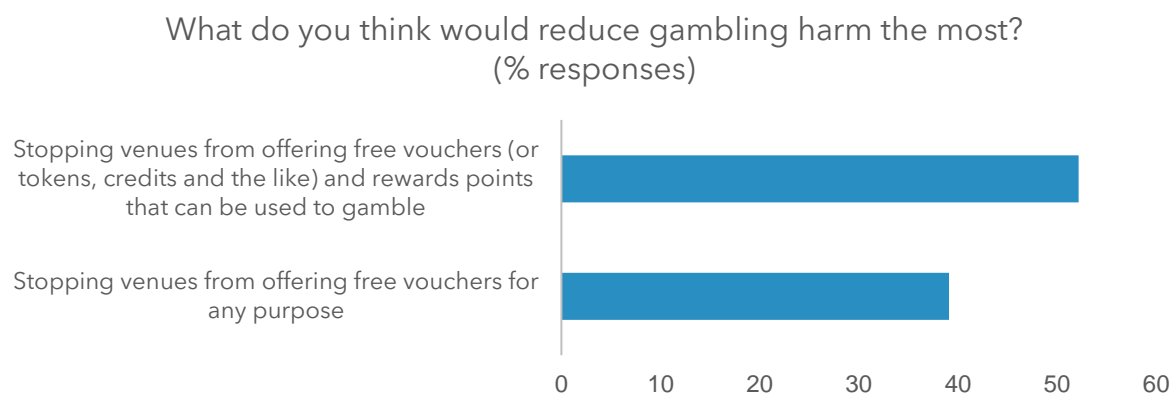
Most survey respondents (76%) agreed that inducements and player loyalty programs affect how much a person gambles ‘a great deal’ or ‘a lot’, arguing that it promoted poor decision-making by making patrons feel valued or encouraging them to believe they were getting a “good deal”.

The Consultation Paper sought feedback on the following options to mitigate the potential for increased gambling from inducements:

- a) prohibit venue operators from offering free vouchers (or tokens and the like) and rewards points to be used for gambling purposes
- b) prohibit venue operators from offering free vouchers for any purpose.

A narrow majority of survey respondents (52%) preferred option (a) and a significant proportion (39%) favoured more extensive restrictions on vouchers (see Figure 3).

Figure 3



This less clear-cut preference may reflect conflicting views on the potential role of vouchers in reducing gambling harm, with one respondent commenting that:

'Whilst I personally think that there should be no free vouchers for anything, harm minimisation means that the time a player is having a free meal, they are not gaming. (If the player is at the premises anyway, non-gambling credit is slightly better.)'

An alternative view saw food vouchers as potentially compounding gambling harm:

'...Children can be pacified with food to allow more time for adults to gamble. The longer time children spend inside venues normalises the behaviour for them, they can also put pressure on the adult to take them out because they get chips or other treats. So the pressure increases to attend a venue in my view .... Adults who would not normally be able to cover food due to losses can use vouchers which does not help in addressing the financial impacts of gambling harm.'

In general, stakeholder feedback regarding loyalty programs was limited and mostly favoured not permitting venues to:

'...offer inducements or loyalty programs. If a venue wants to gain the competitive edge, then it needs to provide better services such as carparking, toilet facilities, more comfortable surrounds.'

One respondent recommended

'[replacement of loyalty cards with] cards that monitor people's gambling spend (similar to the way they operate in casinos) enabling venue staff to approach people with support if their gambling spend is excessive.'

#### 4.2.1 Recommendations relating to inducements and loyalty programs

8. Prohibit venue operators from offering free vouchers (or tokens and the like) and rewards points to be used for gambling purposes or for any purpose that may result in gambling harm.

#### 4.3 Other measures to mitigate against harm from competitive behaviour

The Commission sought feedback on other measures to mitigate against gambling harm that may result from competitive behavior between gambling venues.

Stakeholder suggestions included:

- implementing harm minimisation strategies such as pre-commitment
- restricting the number of EGMs per suburb
- restrict gambling to casinos only
- limiting access to venues, including imposing later opening times/earlier closing times
- keeping gambling separate to areas that serve food & beverages
- measures to reduce the profitability of EGMs:
  - 'Make poker machines less profitable, limit access'
  - 'Limiting how much can be gambled'
  - 'Definite daily limits for each gambler'
  - 'A cap on how much each establishment can make on gambling'.

The Stenning Report notes that many of the Tasmanian Code's provisions compare favourably with other Australian jurisdictions. As Australia has the world's highest gambling losses per capita (Letts 2018), this does not adequately assess the Code's effectiveness in reducing gambling harm, nor does it assess whether the Code is being implemented effectively.

Anglicare and TasCOSS have consulted directly with experienced frontline workers and people experiencing gambling harm about the effectiveness of the Code in reducing



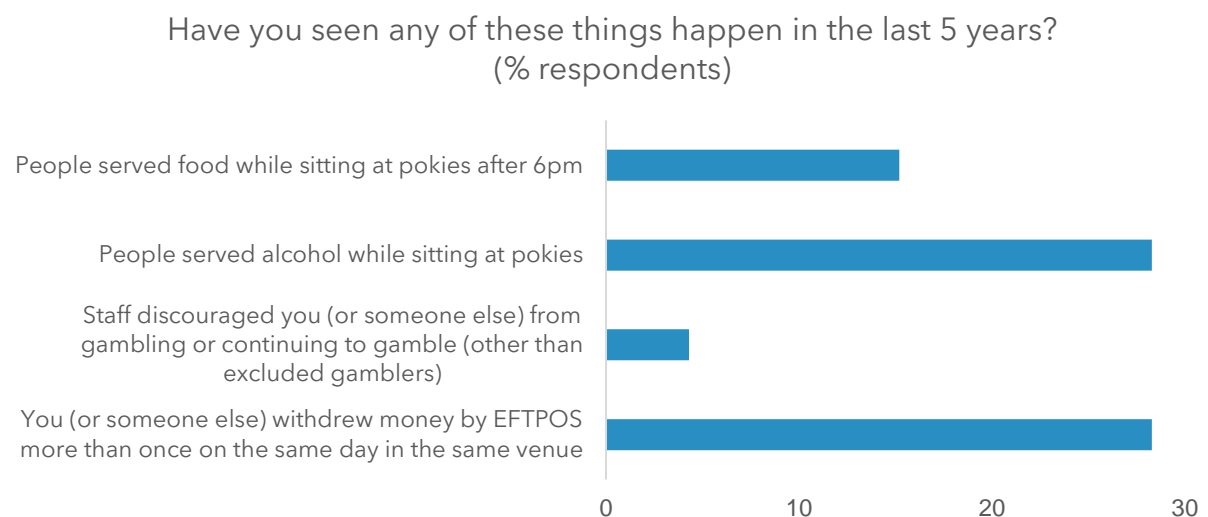
gambling harm. Their responses, which covered all aspects of the Code, revealed serious gaps in implementation. Survey results are provided in Appendix 1.

In particular, stakeholders identified issues with interventions by venue staff required by the Code discussed below. These and other issues of implementation resulting in significant and avoidable gambling harm should be reviewed and addressed prior to 1 July 2023 when the industry changes commence.

#### 4.3.1 Interventions by venue staff

The effectiveness of the Code requires that venue staff are trained and take appropriate action in order for the venue to comply with many provisions of the Code.

Figure 4



Referring to Figure 4, thirteen respondents reported that they had seen people served alcohol while sitting at an EGM, in contravention of the Code. A similar number reported that they or someone else had withdrawn money using EFTPOS more than once on the same day in the same venue. There were also reports of people being served food after 6pm, of staff encouraging players to use a nearby external ATM, and of excluded persons being admitted and losing large amounts of money. Only two people had observed venue staff discouraging gambling.

A third of respondents stated that staff 'rarely' or 'never' turned away excluded persons (refer to Figure 5) and most respondents had little confidence that, overall, venue staff would intervene as required by the Code, with over 70% saying they were 'not so confident' or 'not at all confident' (see Figure 6). This is particularly concerning and likely to deter people experiencing gambling harm from registering for self-exclusion. One

support worker reported they had seen 'many instances of people losing up to \$10,000 in a venue they were excluded from'.

Figure 5

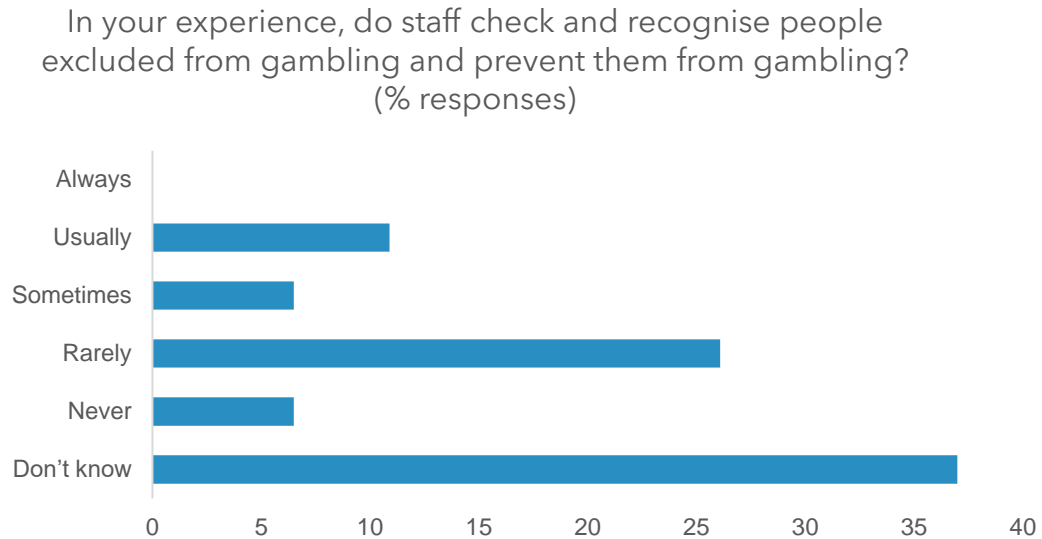
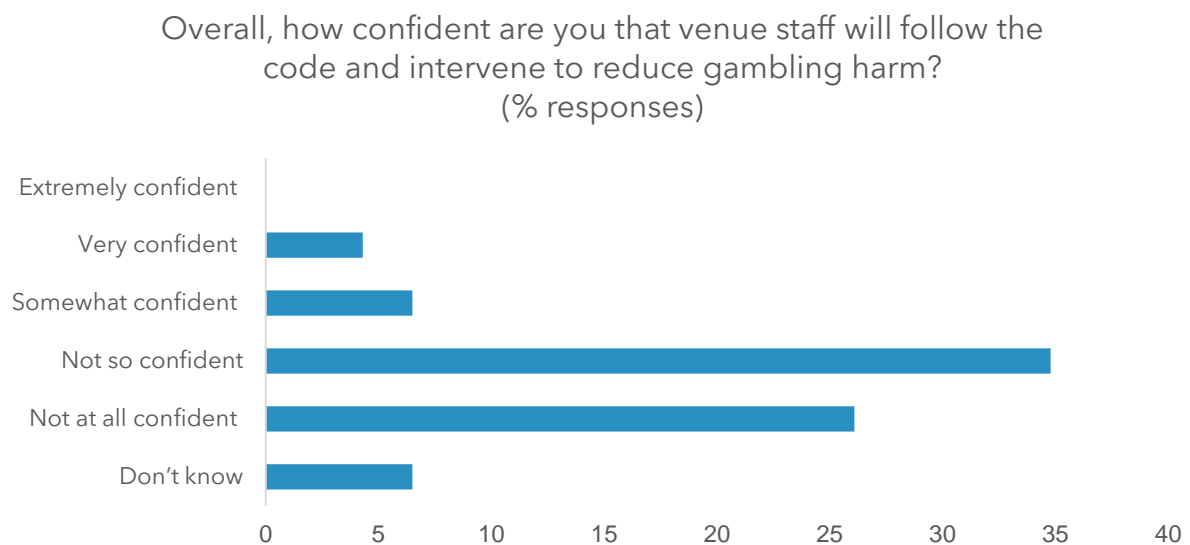


Figure 6



Stakeholders acknowledged the difficulties that staff face and emphasised that responsibility for compliance with these parts of the Code rests with the gambling venues.

#### 4.3.2 Recommendations to mitigate against other harm from competitive behavior

9. Introduce universal registration and pre-commitment for EGMs.
10. Consider introducing a cap on the number of pokies venues or total number of EGMs permitted in a single suburb.
11. Establish limits for the hours in which EGMs can operate that apply to all venues other than casinos (for example, EGMs are not permitted to operate between 2am and 10 am each day).
12. Gambling venues should not be permitted to open when the only part of the premises trading is the gambling area.
13. Gambling areas should be physically separated from areas where food and beverages are served and consumed.
14. EGMs (and other products identified as particularly harmful) should be subject to appropriate levels of progressive taxation to limit incentives for venues to pursue higher profits from EGMs.
15. Review sections of the Code outside of the scope of this review in order to ensure its effective implementation to minimise gambling harm. The review should be completed, in consultation with stakeholders with first-hand knowledge of gambling harm in Tasmania, prior to 1 July 2023.

## 5 Conclusion and recommendations

Anglicare welcomes the opportunity to comment on gambling advertising (including the Advertising Standards), inducements and player loyalty programs prior to the implementation of industry changes. This focus is timely in light of new research providing evidence that:

- the current “responsible gambling” approach to messaging is not contemporary best practice and may contribute to gambling harm
- the impact of advertising on risky gambling behaviour is likely to impose a net cost on the community.

The Code’s objective of minimising gambling harm requires a move away from “responsible gambling” and “problem gambling” terminology to an evidence-based public health approach to gambling harm prevention and minimisation in which messaging provides accurate and specific information about risk and harm. This approach is supported by research evidence and consultation with professionals working to reduce gambling harm in Tasmania.

Consultation with stakeholders with direct experience of gambling harm in Tasmania provided clear evidence that other areas of the Code, particularly those requiring intervention by venue staff, are not being implemented as intended and that this is resulting in significant gambling harm. The Commission should prioritise an urgent review of the rest of the Code in consultation with stakeholders with first-hand experience of gambling harm in Tasmania.

### 5.1 Recommendations

#### **Advertising and advertising standards**

1. All advertising of gambling products should be prohibited, including (but not limited to):
  - a. all outdoor signage/displays advertising or promoting gaming machines
  - b. advertising or marketing of gambling in connection with sporting broadcasts during times when children are likely to be viewing, whether free to air, subscription, or online

- c. advertising or marketing of gambling products via applications or electronic games classified as G
  - d. sponsorship or branding of children’s sporting competitions by gambling operators
  - e. sponsorship or branding of sporting competitions by gambling operators, including endorsements or sponsorship of players (to be phased out over a reasonable period).
2. Establishing a gambling account with associated pre-commitment limits should require formal identification and proof of age.
  3. The Code, the Advertising Standards and other relevant documents should have the stated objective of preventing and minimising gambling harm without reference to “responsible gambling”. The objectives of the *Gaming Control Act 1993* should include prevention and minimisation of gambling harm.
  4. The Code, Advertising Standards and any relevant documents should be updated to remove reference to “gambling responsibly” and “responsible gambling” and replaced with messaging about gambling harm prevention and minimisation to reflect an evidence-based, public health approach. This should include updating the title of the Code.
  5. The Code, Advertising Standards and any relevant documents should be updated to remove references to “problem gamblers”, “problem gambling” and “adverse impacts” and replaced by the concept of gambling harm. The population affected should be referred to as those harmed by gambling.
  6. Social marketing, promotional materials, and campaigns to reduce gambling harm should refrain from using terminology such as “responsible gambling” or “problem gambler” and avoid messages focused on individual behaviour. Messaging should focus on advice about how and where to seek assistance, accurate advice about the price and risks of gambling, and encourage the uptake of tools and techniques to monitor gambling activity and avoid, prevent or minimise harm.
  7. Mandatory warning signs and messages required by the Advertising Standards should refrain from use of the terms “responsible gambling” and “problem gambling”, in favour of evidence-based messages about the harms of gambling and the risks of experiencing those (for example, gambling is associated increased risk of health problems, separation, divorce, financial difficulty).

## Inducements and player loyalty programs

8. Prohibit venue operators from offering free vouchers (or tokens and the like) and rewards points to be used for gambling purposes or for any purpose that may result in gambling harm.

## Other measures for minimising harm in a competitive environment

9. Introduce universal registration and pre-commitment for EGMs.
10. Consider introducing a cap on the number of EGM venues or total number of EGMs permitted in a single suburb.
11. Establish limits for the hours in which EGMs can operate that apply to all venues other than casinos (for example, EGMs are not permitted to operate between 2am and 10 am each day).
12. Gambling venues should not be permitted to open when the only part of the premises trading is the gambling area.
13. Gambling areas should be physically separated from areas where food and beverages are served and consumed.
14. EGMs (and other gambling products identified as particularly harmful) should be subject to appropriate levels of progressive taxation to limit incentives for venues to pursue higher profits from EGMs.
15. Review sections of the Code outside of the scope of this review in order to ensure its effective implementation to minimise gambling harm. The review should be completed, in consultation with stakeholders with first-hand knowledge of gambling harm in Tasmania, prior to 1 July 2023.

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# 7 Appendix 1

## 7.1 Survey design

The survey was developed by Anglicare Tasmania's Social Action and Research Centre in consultation with professionals who provide support to gamblers and TasCOSS. It used a combination of closed and open-ended questions in order to maximise accessibility and completion. While participation in the survey was not restricted, it was targeted at people who have experienced gambling harm and the professionals and organisations that support them.

## 7.2 Administration of the survey

The survey opened on 31 May and closed on 13 June 2022. The survey could be completed online or in writing. The survey questions and associated information are provided on pages vii - xvi.

## 7.3 Summary of survey responses

Two visitors to the survey did not proceed with the survey and their responses have been excluded from the results provided below. The response rate for each question is provided (note that percentages may not add to 100 due to rounding).

### 1. Which of these statements apply to you (mark all that apply)

Answers	number	% (n=46)
I have gambled at a venue in Tasmania in the last 5 years	14	30.3
I have experienced harm from gambling (my own or someone else's)	12	26.1
In my work I provide support to people who gamble and/or work to reduce gambling harm	25	54.3
None of the above	6	13.0
<b>Response rate for question</b>	<b>45</b>	<b>97.8</b>
No response provided	1	2.2

Note that some respondents identified with more than one category.

### 2. Would the Code be more effective if it used words like 'gambling harm' instead of 'problem gambling'?

Answers	number	% (n=46)
Yes	36	78.2
No	3	6.5
Neither / Don't know	5	10.9
<b>Response rate for question</b>	<b>44</b>	<b>95.6</b>
No response provided	2	4.3
<b>Additional comment provided (text)</b>	<b>15</b>	<b>32.6</b>

### 3. How do you think advertising affects gambling and/or harm from gambling?

Answers	number	% (n=46)
A great deal	23	50.0
A lot	11	23.9
A moderate amount	8	17.4
A little	1	13.0
Not at all	0	0.0
Don't know	0	0.0
<b>Response rate for question</b>	<b>43</b>	<b>93.5</b>
No response provided	3	6.5
<b>Additional comment provided (text)</b>	<b>11</b>	<b>23.9</b>

### 4. Which of these changes to pokies advertising would reduce gambling harm the most for children and people at risk of harm from gambling?

Answers	number	% (n=46)
Banning advertising everywhere outdoors	34	73.9
Banning advertising only where children are more likely to see it	6	13.0
Don't know	2	4.3
<b>Response rate for question</b>	<b>42</b>	<b>91.3</b>
No response provided	4	8.7
<b>Additional comment provided (text)</b>	<b>13</b>	<b>28.2</b>

### 5. How do you think things like free vouchers, rewards or player loyalty programs affect how much people gamble and how much money they lose gambling?

Answers	number	% (n=46)
A great deal	23	50.0
A lot	12	26.1
A moderate amount	5	10.9
A little	1	2.2
Not at all	1	2.2
<b>Response rate for question</b>	<b>42</b>	<b>91.3</b>
No response provided	4	8.7
<b>Additional comment provided (text)</b>	<b>14</b>	<b>30.4</b>

6. The Commission is considering new rules limiting inducements. What do you think would reduce gambling harm the most?

Answers	number	% (n=46)
Stopping venues from offering free vouchers (or tokens, credits and the like) and rewards points that can be used to gamble	24	52.2
Stopping venues from offering free vouchers for any purpose	18	39.1
<b>Response rate for question</b>	<b>42</b>	<b>91.3</b>
No response provided	4	8.7
<b>Additional comment provided (text)</b>	<b>6</b>	<b>13.0</b>

7. What other changes could reduce gambling harm or stop competition between venues leading to more gambling?

Answers	number	% (n=46)
<b>Response provided to this question (text)</b>	<b>15</b>	<b>32.6</b>
No response provided	31	67.4

8. Have you seen any of these things happen in the last 5 years? (mark all that apply)

Answers	number	% (n=46)
You (or someone else) withdrew money by EFTPOS more than once on the same day in the same venue	13	28.3
Staff discouraged you (or someone else) from gambling or continuing to gamble (other than excluded gamblers)	2	4.3
People served alcohol while sitting at pokies	13	28.3
People served food while sitting at pokies after 6pm	7	15.2
<b>Response rate for question</b>	<b>23</b>	<b>50.0</b>
No response provided	23	50.0
<b>Additional comment provided (text)</b>	<b>11</b>	<b>23.9</b>

9. In your experience, do staff check and recognise people excluded from gambling and prevent them from gambling?

Answers	number	% (n=46)
Always	0	0.0
Usually	5	10.9
Sometimes	3	6.5
Rarely	12	26.1
Never	3	6.5
Don't know	17	37.0
<b>Response rate for question</b>	<b>40</b>	<b>87.0</b>
No response provided	6	13.0
<b>Additional comment provided (text)</b>	<b>8</b>	<b>17.4</b>

10. Overall, how confident are you that venue staff will follow the code and intervene to reduce gambling harm?

Answers	number	% (n=46)
Extremely confident	0	0.0
Very confident	2	4.3
Somewhat confident	8	6.5
Not so confident	16	34.8
Not at all confident	12	26.1
Don't know	3	6.5
<b>Response rate for question</b>	<b>41</b>	<b>89.1</b>
No response provided	5	10.9
<b>Additional comment provided (text)</b>	<b>10</b>	<b>21.7</b>

11. What changes could help venue staff to intervene and reduce gambling harm?

Answers	number	% (n=46)
<b>Response provided to this question (text)</b>	<b>18</b>	<b>39.1</b>
No response provided	28	60.9

12. Over the last 5 years, how often have you seen venues give you information

- about gambling odds and how much you could lose?

Answers	number	% (n=46)
Always	0	0.0
Usually	3	6.5
Sometimes	4	8.7
Rarely	8	17.4
Never	16	34.8
Don't know	6	13.0
<b>Response rate for question</b>	<b>37</b>	<b>80.4</b>
No response provided	9	19.6

- about where to get help with a gambling problem?

Answers	number	% (n=46)
Always	0	0.0
Usually	7	15.2
Sometimes	10	21.7
Rarely	8	17.4
Never	7	15.2
Don't know	5	10.9
<b>Response rate for question</b>	<b>37</b>	<b>80.4</b>
No response provided	9	19.6

- in a place you can see it?

Answers	number	% (n=46)
Always	1	2.2
Usually	10	21.7
Sometimes	11	23.9
Rarely	7	15.2
Never	4	8.7
Don't know	3	6.5
<b>Response rate for question</b>	<b>37</b>	<b>80.4</b>
No response provided	9	19.6

Tell us more about information provided by venues (text)

Answers	number	% (n=46)
<b>Response provided to this question (text)</b>	<b>10</b>	<b>21.7</b>
No response provided	36	78.3

13. What changes to information given to players could help reduce harm from gambling? (text)

Answers	number	% (n=46)
<b>Response provided to this question (text)</b>	<b>13</b>	<b>28.3</b>
No response provided	33	71.7

14. In your experience, do areas with pokies have:

- natural lighting so you can see if it is day or night?

Answers	number	% (n=46)
Always	0	0.0
Usually	2	4.3
Sometimes	12	26.1
Rarely	16	34.8
Never	5	10.9
Don't know	3	6.5
<b>Response rate for question</b>	<b>38</b>	<b>82.6</b>
No response provided	8	17.4

- lighting bright enough to read signs easily?

Answers	number	% (n=46)
Always	0	0.0
Usually	7	15.2
Sometimes	18	39.1
Rarely	8	17.4
Never	2	4.3
Don't know	3	6.5
<b>Response rate for question</b>	<b>38</b>	<b>82.6</b>
No response provided	8	17.4

- a clock that can be seen from the pokies?

Answers	number	% (n=46)
Always	1	2.2
Usually	4	8.7
Sometimes	7	15.2
Rarely	13	28.3
Never	7	15.2
Don't know	6	13.0
<b>Response rate for question</b>	<b>38</b>	<b>82.6</b>
No response provided	8	17.4

15. What changes could be made to areas with pokies to help gamblers lose less money?  
(text)

Answers	number	% (n=46)
<b>Response provided to this question (text)</b>	<b>10</b>	<b>21.7</b>
No response provided	36	78.3

16. Is there anything else you would like to say about the Code and reducing gambling harm?  
(text)

Answers	number	% (n=46)
<b>Response provided to this question (text)</b>	<b>7</b>	<b>15.2</b>
No response provided	39	84.8

## 7.4 Survey questions

Thank you for participating in our survey. Your feedback is important.  
This survey will take about 10 minutes to complete

### *Why are we doing the survey?*

We want your views on reducing gambling harm.

Gambling venues must follow a code of practice ([the Code](#)) to help reduce gambling harm in Tasmania.

The Code is being reviewed to see how well it is working and what changes could make it work better.

### *How will we use your answers?*

Your answers will help us tell [the reviewers](#) how well the Code is working to reduce gambling harm and what changes could be made to help gamblers lose less money.

### *Who is running the survey?*

Anglicare's Social Action and Research Centre (SARC) and TasCOSS.

### *Consent*

By doing the survey, you agree to the information you provide being used anonymously (you will not be identified) in submissions (written advice) to the 2022 review of the Responsible Gambling Mandatory Code of Practice for Tasmania (the Code).

### *How to do the survey*

On each page, we will tell you in plain English about some of the things the Code says venues need to do to reduce gambling harm.

We will ask you about your experiences and what changes could be made to help gamblers lose less money. You can also add comments at the end.

You do not have to answer every question - it is OK to skip a question and go to the next one if you want to.

If you want to read exactly what the code says, click on [the Code](#) link on each page.

### **Question**

Would you like to read a bit more about the Code and the review before you start?

- Yes (continue to next page)
- No (skip to 'About You')

### *Who needs to follow the Code?*

Businesses that run pokies (gaming machines), casinos (gaming tables), keno, live racing and sports betting (terrestrial wagering), online gambling (online wagering) and lotteries must follow the Responsible Gambling Mandatory Code of Practice (the 'Code'). In this survey, these businesses are called venues.

The Code says what venues must do to reduce gambling harm in their:

- Advertising
- Inducements
- Player loyalty programs
- Access to cash
- Payment of winnings
- Lighting
- Service of food and alcohol
- Clocks in gambling areas
- Staff training in recognising people with gambling problems
- Information to players

Click [here](#) to read more about the Code.

### *About the 2022 Review of the Code*

At least every 5 years, the Tasmanian Liquor and Gaming Commission (the Commission) looks at the Code to make sure it is working well. This is the second review of the Code.

In this review, the Commission is looking closely at advertising, inducements and player loyalty programs. You can read more about this in the Commission's Stakeholder Consultation Paper (link provided).

## **About you**

### **1. Which of these statements apply to you (mark all that apply)**

- I have gambled at a venue in Tasmania in the last 5 years
- I have experienced harm from gambling (my own gambling or someone else's)
- In my work I provide support to people who gamble and/or work to reduce gambling harm
- None of the above



## Minimising harm from gambling

The stated aim of the Code is to minimise harm from gambling.

The Code often uses the phrase 'problem gambling' for gambling "...which leads to adverse consequences for the gambler, others or for the community."

In this survey, we will only talk about 'problem gambling' if that is the actual wording in the Code.

In the rest of the survey, we will talk about 'gambling harm' or 'harm from gambling'.

### 2. Would the Code would be more effective if it used words like 'gambling harm' instead of 'problem gambling'?

- Yes
- No
- Neither / don't know

Explain your answer (optional)

## Advertising

Gambling advertising should not harm children, people with gambling problems, people who might develop gambling problems and the community.

From 1 July 2023, changes to the Tasmanian gaming industry are likely to increase competition between pokies venues. Venues may try harder to attract people through advertising, inducements or loyalty programs. This could lead to more gambling and gamblers losing more money.

You can read all the rules about advertising on pages 6 and 7 of [the Code](#).

### 3. How do you think advertising affects gambling and/or harm from gambling?

- A great deal
- A lot
- A moderate amount
- A little
- Not at all
- Don't know

Tell us more (optional)

**4. Which of these changes to pokies advertising would reduce gambling harm the most for children and people at risk of harm from gambling?**

- Banning advertising everywhere outdoors
- Banning advertising only where children are more likely to see it
- Don't know

What other changes to advertising could reduce gambling harm? (optional)

### **Inducements and Player Loyalty Programs**

Inducements are things like free vouchers (credits, tokens) or rewards. The code says that venues must not offer free vouchers or rewards that might cause someone to develop a gambling problem or make someone's gambling problem worse. Venues must not give you free vouchers or rewards that lead you to gamble when you wouldn't normally gamble or to change your normal gambling patterns.

#### *Player loyalty programs*

The code says that a player loyalty program must not cause someone to develop a gambling problem or make someone's gambling problem worse.

You can read all the rules in [the Code](#) about:

- inducements on page 8
- loyalty programs on pages 9-10

**5. How do you think things like free vouchers, rewards or player loyalty programs affect how much people gamble and how much money they lose gambling?**

- A great deal
- A lot
- A moderate amount

- A little
- Not at all

Tell us more (optional)

**6. The Commission is considering new rules limiting inducements. What do you think would reduce gambling harm the most?**

- Stopping venues from offering free vouchers (or tokens, credits and the like) and rewards points that can be used to gamble
- Stopping venues from offering free vouchers for any purpose

What other changes could be made to inducements or loyalty programs to reduce gambling harm? (optional)

**7. What other changes could reduce gambling harm or stop competition between venues leading to more gambling?**

## **Venue staff**

### *Staff training*

Venue staff must be trained in responsible gambling. The Code says the training should help them to recognise and deal with people with gambling problems and people who are at risk of developing problems.

### *Access to cash*

Venue staff must help you to not gamble more money than you intend by:

- making it harder for you to withdraw cash on impulse
- limiting the amount of cash you withdraw at the venue

### *Payment of winnings*

Venue staff must help you to not gamble more than you intend by:

- checking you are not excluded from gambling before paying you any winnings

- discouraging you from using large winnings to continue gambling
- discouraging you from gambling longer than you intend and losing more
- helping you take a break after a large win

### *Service of food and alcohol*

Venues must help you take breaks from pokies (gaming machines) and make sure you are able to make informed decisions about your gambling.

Venue staff must:

- not serve you food or alcohol at a gaming machine after 6pm (in any venue)
- not serve you alcohol at a gaming machine any time of day (unless you are in a casino)
- stop you from gambling if you look affected by drugs or alcohol

Read all the rules in the Code about:

- Staff training on page 16
- Access to cash on page 11
- Payment of winnings on pages 12
- Service of food and alcohol on page 14

### **8. Have you seen any of these things happen in the last 5 years? (mark all that apply)**

- You (or someone else) withdrew money by EFTPOS more than once on the same day in the same venue
- Staff discouraged you (or someone else) from gambling or continuing to gamble (other than excluded gamblers)
- People served alcohol while sitting at pokies
- People served food while sitting at pokies after 6pm

Tell us more about your experience of staff intervening to reduce gambling harm (optional)

**9. In your experience, do staff check and recognise people excluded from gambling and prevent them from gambling?**

- Always
- Usually
- Sometimes
- Rarely
- Never
- Don't know

Tell us more (please specify)

**10. Overall, how confident are you that venue staff will follow the code and intervene to reduce gambling harm?**

- Extremely confident
- Very confident
- Somewhat confident
- Not so confident
- Not at all confident
- Don't know

Tell us more (optional)

## 11. What changes could help venue staff to intervene and reduce gambling harm?

### Information to Players

Venues need to help you understand how gambling works and to make informed decisions about your gambling.

Venues must do this by:

- giving you information
  - about how to gamble responsibly and limit the amount of money that you lose
  - about where to get help with a gambling problem
  - about how you can exclude yourself from gambling
  - that helps you understand how much money you might lose (odds, pay scales, return to player and take out rates where applicable)
- displaying information in the venue where you can easily see it - both in busy areas and fairly private places
- providing the information on their website, if they have one.

You can read the rules in [the Code](#) about information to players on page 17

## 12. Over the last 5 years, how often have you seen venues give you information?

	Always	Mostly	Sometimes	Rarely	Never	Don't know
About gambling odds and how much you could lose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
About where to get help with a gambling problem	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In a place  
where you can  
see it

Tell us more about information provided by venues (optional)

**13. What changes to information given to players could help reduce harm from gambling? (optional)**

### Gambling Environment

Venues need to help you keep track of time so that you do not gamble for longer than you intend. Natural lighting (daylight) in pokies areas helps you keep track of time and know when it is day or night.

#### *Lighting*

Lighting in areas with pokies or gaming tables must be bright enough to:

- be able to see people's faces clearly
- make clocks and signs easy to read

#### *Clocks in gambling areas*

Venues must make sure there is a clock in every area with pokies or gaming tables that is easy to see.

Read the rules in [the Code](#) for:

- Lighting on page 13
- Clocks on page 15

**14. In your experience, do areas with pokies have:**

	Always	Usually	Sometimes	Rarely	Never	Don't know
Natural lighting so you can see if it is day or night	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lighting bright  
enough to  
read signs  
easily

A clock that  
can be seen  
from the  
pokies

15. What changes could be made to areas with pokies to help gamblers lose less money? (optional)

**Other comments**

16. Is there anything else you would like to say about the Code and reducing gambling harm? (optional)

Thank you for taking the time to complete this survey