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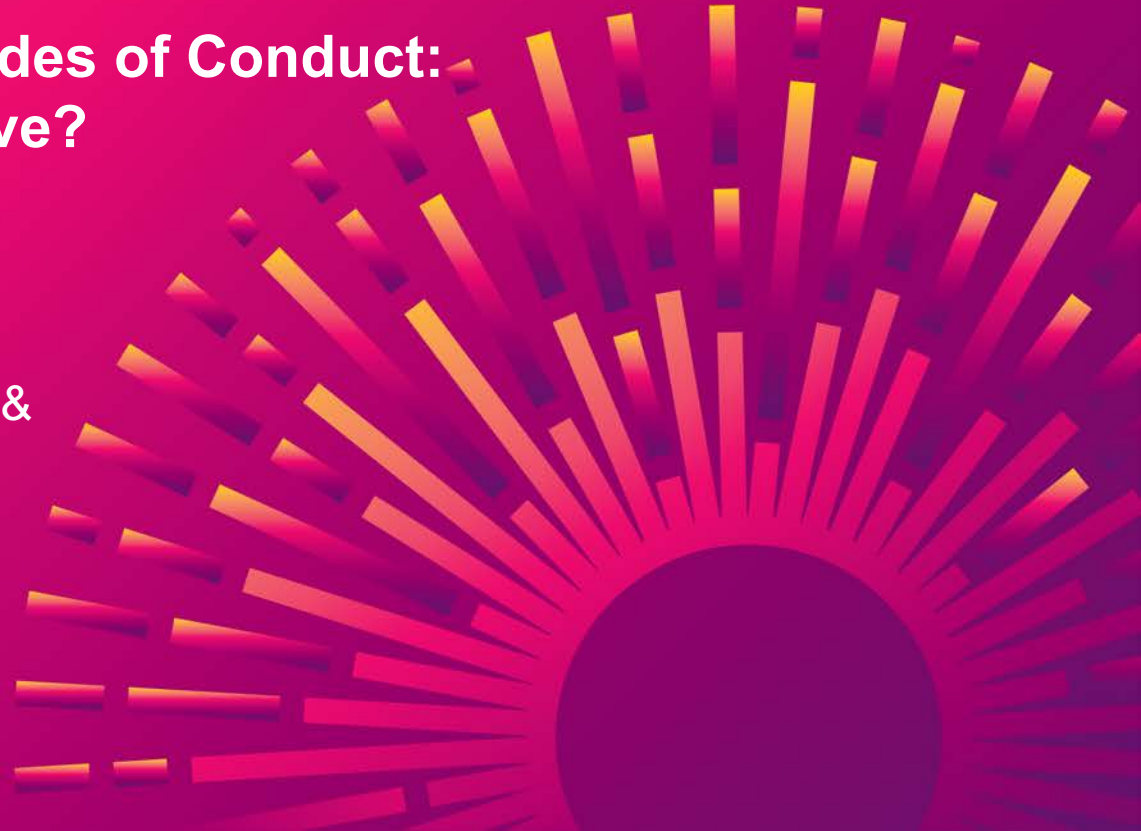
Australian Institute of Family Studies



Responsible Gambling Codes of Conduct: What purpose do they serve?

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- +I am employed by AGRC which is funded by the Commonwealth Government
- +I do not work for, consult to, own shares in or receive funding from any company or organisation that would benefit from this study
- Views expressed are mine and may not reflect the + views of the AIFS or the Australian Government +

Why this study? +



- +‘Responsible gambling’ Codes of conduct (CoC) are a requirement of licensing in Victoria
 - Passive strategies: signage, protocols for cash payments, self exclusion program etc
 - Active strategies: Interact with gamblers showing signs of distress, interrupt EGM use
- +CoC valued by VCGLR in consideration of licensing applications
- +Venue staff: first to notice escalation of problematic gambling

Research questions +

1. +What do the CoC say venues will do in the event a gambler is showing signs of distress?
1. +Are these protocols actually implemented?



- Venue profiles
 - Venue CoC (8 individual documents)
 - Venue type, machine numbers, annual losses
- Site observations
 - 11 EGM venues & two local neighbourhoods
 - Unannounced observations
 - Used the behavioural checklist as a guide for expected and observed interactions

Excerpt from an approved Code +



A customer displaying signs of distress or unacceptable behaviour will be approached by a staff member who will offer assistance.

These signs may include, but not be limited to:

- a person either gambling every day or finding it difficult to stop gambling at closing time;
- gambling for extended periods. That is, gambling for three hours or more without a break;
- avoiding contact while gambling, communicating very little with anyone else, barely reacting to events going on around them;
- making requests to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
- displaying aggressive, anti-social or emotional behaviour while gambling.

This assistance may take the form of:

- staff interacting with the customer and encouraging them to take a break from the gaming machine;
- staff offering the customer some refreshments (eg. cup of tea or coffee) in a quieter, more private part of the gaming venue.

If the behaviour could be due to problem gambling, the customer will be referred to the Responsible Gambling Officer.

Observation Checklist

Loss of Control		Tick
1	Tries obsessively to win on one machine	
2	Gambles right through normal meal times	
3	Finds it difficult to stop gambling at closing time	
4	Starts gambling when the venue is opening or only stops when venue is closing	
Money Seeking		Tick
5	Gets cash out on 2 or more occasions through EFTPOS	
6	Puts large wins back into the machine and keeps playing	
7	Has run out of all money when he/she leaves venue	
8	Leaves venue to find money to continue gambling	
9	Asks to change large notes at venue before gambling	
10	Rummages around in purse or wallet for additional money	
11	Witnessed or heard that a customer was trying to borrow money from other people at venue or asking for credit from venue	
Intensity and Duration		Tick
12	Spends \$300 or more in a session	
13	Often gambles for long periods (3+ hours) without a proper break	
14	Bets \$3 or more per spin most of the time	
15	Plays very fast	
16	Gambles on 2 or more machines at once	
17	Gambles intensely without reacting to what's going on around him/her	
18	Gambles most days	
19	Rushes from 1 machine to another	
20	Significant increase in spending pattern	
Irrational and Superstitious Behaviour		Tick
21	Complains to staff about losing, or blames venue or machines for losing	
22	Rituals or superstitious behaviours such as rubbing belly of machine or screen, talking to machine, spitting on machine, use of luck charms	
Emotional Responses		Tick
23	Shows signs of distress after gambling (looks sad/depressed, crying, holding head in hands, nervous/edgy, shaking, sweating)	
24	Gets angry while gambling (kicking, hitting machines, swearing, grunting or groaning, playing roughly/aggressively)	
Social Behaviour		Tick
25	Stays on to gamble when friends leave venue	
26	Is rude or impolite to venue staff	
27	Becomes angry or stands over others if someone takes their favourite machine/spot	
28	Avoids contact or conversation with others	
29	Generally poor hygiene, or, significant decline in personal grooming or appearance over	

Source: Delfabbro, P., Thomas, A., & Armstrong, A. (2016).



- Interviews
 - 40 gamblers (regular & ‘problem’) who used local EGM venues
 - purposively recruited via survey
 - 20 professionals (VSW, VCGLR, staff, manager) +
 - purposively recruited via direct invitation
- Thematically coded in Nvivo
- Data triangulated (observations, interviews, codes) +

Profile of venues +



Table 1. Venue observations.

Venue type	Instances observed	Cumulative time (mins)	Venue losses 2016 (\$AU) ^a	Total venue EGMs 2016 ^b
Club A	4	150	6,173,931	60
Club B	3	210	516,534	18
Club C	2	135	3,650,148	60
Club D	5	180	2,510,251	39
Club E	5	210	8,335,537	10
Hotel F	4	260	13,654,131	88
Hotel G	4	165	8,932,615	55
Hotel H	2	85	8,436,834	85
Hotel I	5	150	5,564,880	45
Hotel J	4	315	9,744,649	50
Hotel K	4	200	8,557,097	66
Total	42	2,060	76,076,607	576
Average observation (mins)		50		
Median observation (mins)		45.0		

Observations were undertaken by the first two authors with both visiting each venue at least once. Eight venues were located in Site 1 and a further three venues were located in Site 2. ^aRounded to nearest dollar. ^bAnnual loss and EGM machine numbers for each venue to financial year 2016 (Victorian Commission for Gambling and Liquor Regulation, 2016a).

Gamblers interviewed +

Table 2. Characteristics of local EGM gamblers.

	<i>N</i>	Median	Mean (SD)
Total scores (0–27)	40	9.0	10.9 (8.4)
PGSI categories	<i>N</i>	%	
Non-problem gambling (PGSI 0)	3	8.1	
Low-risk gambling (PGSI 1–2)	3	8.1	
Moderate-risk gambling (PGSI 3–7)	9	24.3	
High-risk gambling (PGSI 8+)	22	59.5	
Total	37	100.0	
Past gambling problem (Did not gamble in past 12 months)	3		
Lifetime gambling problem	<i>N</i> ^a	%	
Yes	34	89.5	
No	4	10.5	
Total	38	100.0	
Main gambling form	<i>N</i>	Primary %	Secondary <i>N</i>
Poker machines	32	80.0	2
Casino table games	3	7.5	2
Sports betting	2	5.0	2
Horse or dog races	2	5.0	6
Poker	1	2.5	2
Keno	0	0.0	0
Bingo	0	0.0	1
Lottery	0	0.0	0
Instant scratch tickets	0	0.0	0
Total	40	100.0	

- +Staff observed regularly on the gaming floor
 - focused on ‘customer service’ –servicing machines, book pays, food and beverages etc
- +Very limited, isolated evidence of supportive interventions to reduce harmful use
 - Some actions encouraged continued gambling +
 - While some gamblers said they would have found an intervention embarrassing, others wanted support

Isolated instances of support +

“Well the one that did it [provide support]to me. She looked like a friend. 'Cause I went up to her and I got really upset and [she said], "Wendy go home. Go home, Wendy. "... What are you doing out this late?" You know like 1 o'clock on the morning... That one time it happened ... she was lovely 'cause she cared. - G286

[Name changed].

Lack of interaction and support

“I've never been offered the support. Which is quite funny 'cause I often say to them things like, even last fortnight I said to the girl, “I've got a list here of things that I have to do and a note on the bottom saying ‘do not spend this money it is not spare’”, you know. I said “so much for that note” and she [staff member] went “Oh, you know” [oh well]” – G1134

Desired support not provided +

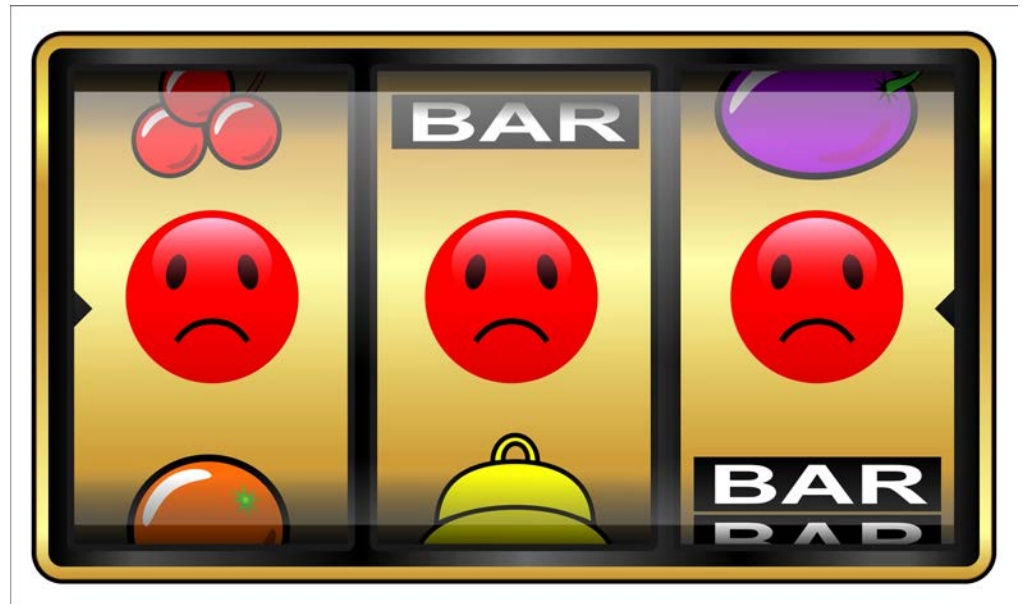
“There's been many, many times where I would've loved for someone to stop by and say, "Do you need someone to speak to?" ...I'm sitting there and promising myself, "Okay, this is the last \$50, this is the last \$50." And you see the money go down quite quickly and you know that that money is needed for so many other things in your life and yet you can't walk out so maybe just having that someone come up to you and say, " Do you need assistance?" would have just been enough to get you out even that one time to be able to ...have that money for something else.” - G364

Venues encourage gambling +

- + *“The only reason they'd approach you, ...”“Would you like another drink, sir?” You know, that's it. Or, “Look, we've got a tray of sausage rolls by the by. You're welcome to go grab a couple”.*” - G1094
- + *“ No they'd encourage it [continued gambling]. They'd give you a coffee or a Coke or - the longer you played there, the more they'd give you... when you're winning, they'd attend to you. But if you're losing or anything - they wouldn't come near you.”* - G258

Not all gamblers want to be identified

“No...I'd be so negative about it [staff offering gamblers help support], yeah. I think I'd be a bit upset with them, a bit spare with them, thinking, "... Do they know that I'm a problematic gambler or something?" ... I think that would be quite the embarrassment.” – G251



Better regulation of cash withdrawals needed +

“... when they had them [ATMs] and you could only get \$400 after that you had to leave the venue and go somewhere else... which gave you time to think and break.... Nowadays you can go up to the bar but you can only get 200 at a time. However you can do that as many times as you like. So I’ve gone through a \$1,000 [a session] that way” - G1134.

“I can’t fathom on what planet we thought taking away that \$400 limit was okay... there’s no need for it to be more than \$400 a day. I don’t care whether you’re addicted to playing or you’re a social gambler, \$400 for anyone is a lot of money.” -P1703



Management not supportive of staff +



"...You get your responsible service of gaming license and you [learn you] can legally tell them [gamblers] 'no you've had enough go home, stop, cool down ... but you get [to work] and your boss is like 'you do that, you're out of here'... well, he didn't say it directly but that was what he was hinting at ... I had one guy come in and get like \$200 cash out three times in an hour ... the kind of guy who had dirty work boots, you know, ripped up clothes and he was just really desperate. And it was like my third shift there and I knew I should've said something like, "Dude, slow down" but then the manager's just like ... "No, no, no, give him another one [cash withdrawal]" -P1063

Breaches of self-exclusion +

“After I had done it, I called them and said, "Look, you know, I'm self-excluded from your venue and I've just come in there and of course did a lot of money and I'd like you to look out for my photo or maybe the staff should be aware of my picture" and I gave them my name and that was about it.” – G215



‘Interviewee: ... they don't really care because I did have myself on the ...exclusion list... it only lasted three months, if that, because one of the security guards on the door...said, "Oh well, I haven't seen you come into today so I don't know what's going on”.

Interviewer: So he let you in?

Interviewee: He let me in, yes.” – G123

The problem +

- We know there are significant harms resulting to + problematic gambling, venues at the front line +
- +But venues not adhering to CoC
 - No reported formal warnings issued to venues by VCGLR 2015-16
 - Why are CoC given so much weight in regulatory settings?
- +Not all gamblers welcome interaction
- +Staff not comfortable/ discouraged by management to interrupt gambling
- +Would interventions even be efficacious?

The solution +



- Reduce burden on gamblers & staff
 - Ban practices that don't reflect in spirit of CoC
 - Prohibit food and drink service at machines
 - Prohibit multiple cash withdrawals
 - Staff need legislative support to implement CoC
 - penalties should apply to venues that breach CoC +
 - Use algorithms to identify patterns of escalating harm and send pop up messages to the gambler
 - Activate universal binding pre-commitment system +

- +Self regulation appears to be ineffective:
 - Need legislation requiring venues to adhere to SEP, CoC likely to improve compliance
 - ~~V~~CGLR requires resources to monitor compliance
- +Technology to support gamblers and staff in negotiating awkward encounters is available but not yet well utilised

References and further reading +

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Presentation based on new paper +



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Responsible gambling codes of conduct: lack of harm minimisation intervention in the context of venue self-regulation

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Australian Capital Territory

Comments on the ACT Gambling & Racing Code of Practice and Behaviour of Clubs in the ACT By Professor Laurie Brown, 8 June 2017. AIFS Webinar

Gambling and Racing Control (Code of Practice) Regulation 2002

SL2002-28

made under the

Gambling and Racing Control Act 1999

Republication No 11

Effective: 5 November 2015

Republication date: 5 November 2015

Last amendment made by [A2015-41](#)

Unauthorised version prepared by ACT Parliamentary Counsel's Office

Role of ACT Gambling and Racing Commission

- Currently audits ACT Clubs with respect to requirements under the Code of Practice – *letter of the law*

What is needed is

- ‘Policing’ the implementation of Code of Practice regulations by the Clubs –

- Meaning of gambling problem in the Code
“a person has a **gambling problem** if the person has difficulty limiting the amount of money or time spent on gambling and this leads to adverse consequences for the person or another person”
- +A licensee commits an offence if the licensee contravenes the code of practice e.g.
 - licensee fails to have gambling contact officer
 - make available for inspection by the Commission a record of problem gambling incidents kept by the licensee under the code of practice

spirit or intent of the law

1.4 Staff care and training

- (1) The licensee of a gambling facility must ensure that—
 - (a) each staff member who is directly involved in providing gambling services to patrons and each person who supervises the staff members—
 - (i) has successfully completed an approved training program within the previous 3 years;
 - (b) each staff member is made aware of his or her obligations under this code of practice

Why do staff not put their training into action?

1.6A Recording problem gambling incidents

(1) A licensee of a gambling facility must keep a record of the following incidents (a problem gambling incident):

(a) anyone who shows signs of having a gambling problem

Examples—signs that person has gambling problem

- + admitting being unable to stop gambling or to gamble within the person's means
- + expressing concern about the amount of time or money the person spends on gambling
- + acknowledging the person spends on gambling money needed for day-to-day living expenses, including for dependents
- + having a disagreement with a family member or friend about the person's gambling behaviour
- + **making multiple ATM cash withdrawals in the gambling facility**

1.11 Dealing with people with gambling problem

(1) The licensee of a gambling facility must ensure the gambling contact officer for the facility is told about—

- (a) any person in the facility whom the licensee or a staff member has **reasonable grounds** for believing has a gambling problem; and
- (b) the details of the person's behaviour that led to the belief.

1.18 Licensee must keep deeds and notices of exclusion

(1) A licensee of a gambling facility must keep—

- (b) a copy of each notice of exclusion given by the licensee for 7 years from the day the notice is given.