

Queensland Responsible Gambling

Code of Practice

Report on The Sustainability Review

Office of Regulatory Policy
Department of Employment,
Economic Development and Innovation

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I. Executive summary

I.1 Background

On 29 May 2002, the then Deputy Premier, Treasurer and Minister for Sport, the Honourable Terry Mackenroth MP, launched the *Queensland Responsible Gambling Code of Practice: Trial and Review (Code of Practice)*. The voluntary *Code of Practice* was developed by the Responsible Gambling Advisory Committee (RGAC) in consultation with key stakeholders within and outside the gambling industry. The RGAC, a tripartite alliance of community, industry and Queensland Government representatives, provides advice to the Queensland Treasurer on responsible gambling and how to maintain gambling environments that minimise harm from gambling.

In recognition of the diversity across the gambling industry sectors, the *Queensland Responsible Gambling Resource Manual (Resource Manual)* was developed by each industry sector in collaboration with Government to support the implementation of the *Code of Practice*.

I.2 Rationale for the Code of Practice Report on the Sustainability Review

The *Code of Practice* promotes responsible gambling by encouraging the creation and maintenance of gambling environments that minimise harm to gamblers and the wider Queensland community. The RGAC recognised it would take time for all industry sectors to implement the *Code of Practice* and for subsequent effects to flow on to the community. A five year, three stage review model examining (1) Implementation, (2) Cultural Shift and (3) Sustainability was designed. The *Queensland Responsible Gambling Code of Practice Report on the Sustainability Review (Report on the Sustainability Review)* is the final report that assesses long-term sustainability. The first two reports in the series are available from www.olgr.qld.gov.au

I.3 Aim

The *Report on the Sustainability Review* aims to inform the Minister, members of the RGAC and other relevant stakeholders whether the *Code of Practice* will be sustainable in the future. In the context of this review, sustainability refers to industry led promotion and maintenance of long-term, resource effective and efficient responsible gambling practices. Such practices encourage economically and socially viable gambling by recognising the State and community benefit from gambling, and addressing the potential harm associated with gambling.

I.4 Objectives

The *Sustainability Review* focused on data collected during the period between January 2006 and December 2007, and also referred to findings of the previous reviews (the Implementation Review and Cultural Shift Review) in order to find indicators of, and risks to the long-term sustainability of the *Code of Practice*. The *Report on the Sustainability Review* will be used to inform activities designed to achieve and maintain sustainability of the *Code of Practice* through a co-regulatory approach, whereby multi-stakeholders are involved in both public regulation by law and self regulation by industry. Outcomes were measured against performance indicators in six areas listed in the *Code of Practice*.

I.5 Progress on outcomes of the Queensland Responsible Gambling Code of Practice

I.5.1 Outcome 1: Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices.

The *Code of Practice* aims to ensure that stakeholders, including individuals, communities, the gambling industry and the Government, have a shared understanding of responsible gambling practices. The *Report on the Sustainability Review* has found that awareness of responsible gambling has improved. Around 40% of the Queensland adult population had heard of the *Code of*

Practice and 42% were aware of the Government's responsible gambling campaign (Queensland Household Gambling Survey 2006-07). The Queensland Household Survey 2007 found that 55% of the Queensland adult population were aware of responsible gambling advertising, and 61% had heard of the Gambling Help Line phone number. There was high commitment among gambling venues to displaying responsible gambling signage, however, in order to maintain message impact, continued evaluation and development of signage and campaigns will be required.

The *Phase 3 Survey, 2006*, found overall high commitment levels for venues in some sectors, yet inconsistency across sectors, venue types and regions, particularly for undertaking refresher training and training in exclusions. There is also a need for venues to establish and maintain stronger links with their local Gambling Help service providers. The Gold Coast Responsible Gambling Network demonstrates the growing self-sufficiency of industry and Gambling Help services to support the shared understanding of the *Code of Practice* among their members, and the expansion of such groups will enhance commitment to the *Code of Practice*.

1.5.2 Outcome 2: Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices.

The RGAC has committed a working party to finalise and document the rights and responsibilities of all stakeholders in relation to responsible gambling. The five-year review has seen continuous improvement in commitment across all sectors, with the Phase 3 commitment level of casinos and UNiTAB continuing at 100%, lotteries at 97%, hotels at 89% and clubs at 83%. Racing at 56% and bingo at 51% are higher than previous levels, although not comparable because of differences in sampling. Strategic use of existing audits and compliance data for all sectors would assist in maintaining commitment to the *Code of Practice* in the future.

After five years of the operation of the *Code of Practice*, 39% of the Queensland adult population, as reported in the *Queensland Household Survey 2007*, did not know where to go to make a complaint; and only 17% who would go to a gambling venue, highlighting a lack of knowledge about how to make a complaint. The majority of complaints continue to be in the areas of exclusions, and advertising and promotions.

Implementation of the recommendations of an independent review of the Gambling Help Service System undertaken in 2006 will ensure significant improvements to the performance management framework of Gambling Help services. A more efficient data management system will enable the help-seeking behaviours of those experiencing problems related to gambling to be understood, and inform strategies to enhance the provision of support for people affected by problem gambling.

1.5.3 Outcome 3: The gambling industry provides safe and supportive environments for the delivery of gambling products and services.

The *2006 Gaming Machine Venue Survey* noted that of the venues surveyed, 94% believed that responsible gambling practices provided a supportive environment for customers. This increased in the *2007 Gaming Machine Venue Survey* to 96% of clubs and 96% of hotels. On-site availability of a staff member to assist customers and staff with gambling-related problems was an area of the *Code of Practice* that lacked industry-wide commitment. Other issues requiring encouragement were improving staff knowledge of the role of the Customer Liaison Officer, and of the importance of the linkages between venues and their local Gambling Help service. Peak bodies have an important role to assist small and remote venues to participate in networks in order to access information and advice on specific areas of the *Code of Practice*.

The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* reported there were an estimated 1,618 individuals who had sought exclusions. Across the review period, exclusions were raised as an area of the *Code of Practice* that created specific difficulties for gambling providers, whether large casinos or small venues. The Government review of the exclusion framework will examine options and address issues around exclusions.

1.5.4 Outcome 4: Customers make informed decisions about their gambling practices.

Gambling providers have a responsibility to provide information that allows customers to make informed decisions about their gambling practices, ensuring that they are aware of exclusion provisions, and have access to information about the odds of winning and rules of games. The *Queensland Household Survey 2007* reported that awareness of exclusion provisions was 52%. Around 66% of those that were aware, were in the age group 55 to 64 years, compared to 38% in the 18 to 24 category.

Agreement with faulty cognition correlate statements in the *Queensland Household Gambling Survey 2006-07* was more likely amongst persons in the at-risk gambling groups. The Player Information Display Board has been reviewed in order to improve the format so that customers will be more aware of information on the odds of winning that are available on request. The *Phase 3 Survey* reported that some 91% of clubs and 94% of hotels were familiar with their local Gambling Help service. However, strengthening of these relationships is important for the on-going sustainability of the *Code of Practice*.

1.5.5 Outcome 5: Harm from gambling to individuals and the broader community is minimised.

Minimising the harm associated with gambling to individuals and the broader community is a long-term objective of the *Code of Practice*. According to the *Queensland Household Gambling Survey 2006-07* the prevalence rate for problem gambling was 0.47% (or approximately 14,000 adult Queenslanders) with 1.8% in the moderate risk group, and 5.7% in the low risk group. Some 67% were in the recreational gambler group and 25% in the non-gambling group. There was an over-representation (61%) of those aged 35 to 54 years in the problem gambling group. Between the 2003-04 and 2006-07 surveys there was an increase in the proportion of persons in the non-gambling group and a decline in the proportion of persons in the recreational gambling group.

The *Queensland Household Gambling Survey 2006-07* noted that although 48% of the problem gambling group reported wanting to get help in the last 12 months, only 28% had actually done so. More than half of the problem gambler group were also likely to have co-morbidities. Around 11% of those at risk of problem gambling had attempted to exclude themselves from venues. The Government's self-help manual will be an important resource for those who are reluctant to approach formal support services for help with gambling-related problems. The *Gambling Help Service System Six-Monthly Reports* found that in the six months to December 2007 the Gambling Help Line received more referrals from 'another gambler', or 'family or friends' than other sources. There were fewer referrals from gambling venues to the Gambling Help services than there were from 'family/friends/neighbours', with the highest proportion of referrals, 37%, from the Gambling Help Line.

1.5.6 Outcome 6: People adversely affected by gambling have access to timely and appropriate assistance and information.

Consumers who are adversely affected by gambling should have access to timely and appropriate assistance and information. Gambling providers accounted for a relatively low percentage of all referral sources for the Gambling Help Line and Gambling Help services which may indicate a need for stronger and more effective links to be maintained between gambling providers and Gambling Help services.

The *Gambling Help Line and Gambling Help Service Six-Monthly Reports* noted that the number of calls to the Gambling Help Line between July 2002 and December 2007 was 24,128. In the six months to December 2007, those most likely to call were in the 31 to 35 year age group. The Gambling Help Line provided referrals to other agencies. Some 38% of callers received counselling and support, and 25% received information and education.

In the six months to December 2007, the Gambling Help services counselled 504 clients (in addition to the 7,790 clients counselled between July 2002 and June 2007). Approximately 53% of Gambling Help service clients were male, and 41% were female. During the six months to December 2007 there was an increase in the proportion of clients aged over 55 years.

The age group 35 to 54 years accounted for the largest proportion of clients seeking help. The improvements being implemented to the Gambling Help Service System will improve data collection, system delivery and efficiency in the future.

1.6 Sustainability of the *Code of Practice*: an Embedded Feature of Business Practices in the Gambling Industry

Overall, the level of commitment to the *Code of Practice* achieved in five years has demonstrated the willingness of industry, community and Government to work together to achieve a remarkable change in the gambling environment in Queensland. Legislative changes have made some practices in the *Code of Practice* mandatory during the five-year review period, and recommendations from each review have resulted in provision of resources to improve stakeholder understanding and knowledge in specific areas. There was general agreement among key stakeholders that the *Code of Practice* was well positioned for long-term sustainability, and that it will remain a dynamic, living document, able to accommodate unforeseen changes in the future, such as legislative change and technological developments.

1.7 Key findings and recommendations

Outcome 1: Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices

Finding 1

Commitment to training has been high in sectors where management structures are centralised, however, there is a disparity in the maintenance of ongoing training and the quality of training among smaller gambling providers, some of those with a decentralised management structure, and/or those in remote locations.

Recommendation 1

Government and industry peak bodies are to continue to encourage best practice among gambling providers, in particular those outside the scope of the mandatory training that will be introduced for hotels and clubs.

Finding 2

The Responsible Gambling network operating on the Gold Coast demonstrates how industry and Gambling Help service providers work effectively together to share information, knowledge, training and resources for the benefit of all stakeholders in specific locations.

Recommendation 2

Industry peak bodies are to ensure that gambling providers know their responsibilities under Practice 2.1 of the *Code of Practice* (Community liaison), and collaborate with the Gambling Help network to promote the benefits that linkages between venues and Gambling Help services provide to venues, staff and customers.

Finding 3

There is a high level of commitment to the display of responsible gambling signage. However, the effectiveness of signage, information content, and message placement should be improved.

Recommendation 3

The RGAC, industry and Government are to explore ways to ensure that signage in venues as outlined in Practice 1 of the *Code of Practice* (Provision of information), is effective in size, content and placement for all consumers, including those from Culturally and Linguistically Diverse (CALD) communities.

Outcome 2: Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices.

Finding 4

The Responsible Gambling Advisory Committee (RGAC) endorsed the definitions of Rights and Responsibilities and formed a working party to develop and document the specific rights and responsibilities of industry stakeholders.

Recommendation 4

An RGAC Working Party is to continue to develop, document and update the rights and responsibilities of all stakeholder groups.

Finding 5

Respondents answering questions about complaint handling procedures did not have a high awareness of their ability to raise complaints about gambling venues not providing responsible gambling environments.

Recommendation 5

Industry, community and Government are to explore ways to ensure customers have access to information about how to make a complaint if they have concerns about responsible gambling.

Finding 6

The *Advertising and Promotions Guideline* was developed to assist industry, yet breaches continue and complaints are received about inappropriate advertising that is outside the Act and the spirit of the *Code of Practice*.

Recommendation 6

As this issue is being examined in a significantly wider strategic context, it is recommended that, in addressing this issue, the Government has regard for the recommendations of the evaluation of the *Queensland Responsible Gambling Strategy* in this area.

Outcome 3: The gambling industry provides safe and supportive environments for the delivery of gambling products and services

Finding 7

Ongoing measurement of industry commitment to the *Code of Practice* is essential, as are processes to identify best practice in demonstrating the *Code of Practice*'s philosophy of continuous improvement.

Recommendation 7

Government is to consult with industry to establish a systematic process to measure industry's voluntary commitment to the *Code of Practice* and to identify best practice.

Finding 8

The lack of established, effective, state-wide links between gambling providers and local Gambling Help services is a risk for the *Code of Practice*.

Recommendation 8

The RGAC is to explore new ways of strengthening relationships between gambling providers and Gambling Help services.

Finding 9

There is evidence of a lack of understanding among some staff about how to undertake an exclusion.

Recommendation 9

As exclusions processes were developed by industry in conjunction with the Gambling Help services network, the Government supports industry peak bodies and the Gambling Help Services network in identifying ways to improve training in exclusions and the role of the Customer Liaison Officer and simplify the process of exclusions.

Outcome 6: People adversely affected by gambling have access to timely and appropriate assistance and information

Finding 10

It is important for the provision of appropriate Gambling Help services that accurate, reliable data is captured.

Recommendation 10

Government is to ensure that the Gambling Help Service System maintains robust records through the improvements introduced and provides uniform system delivery and efficient, accurate and timely reporting.

Finding 11

Changes that have occurred during the five-year review period, such as legislative amendments to exclusions provisions and proposed changes to the provision of responsible gambling training need to be reflected in the *Code of Practice* document.

Recommendation 11

As this issue is being examined in a significantly wider strategic context, it is recommended that, in addressing this issue, the Government has regard for the recommendations of the evaluation of the *Queensland Responsible Gambling Strategy* in this area.

2. Introduction

2.1 Background information

The Queensland Government released the *Policy Direction for Gambling in Queensland* (the Policy Direction) in April 2000 in response to public concern over the growth of gambling in the community and in particular the issue of the growth in electronic gaming machines. The Policy Direction aimed to ensure an appropriate balance in the provision of gambling services. This balance acknowledged gambling as an accepted part of the leisure and entertainment industry, while also recognising and addressing its social impact. The Policy Direction articulated initiatives the Queensland Government would implement to meet its commitment to balancing the economic and social costs and benefits of gambling. One initiative was to develop an overarching strategy, and the *Queensland Responsible Gambling Strategy* (the Strategy) was launched in February 2002. The Strategy, the first of its kind in Australia, aims to address social issues arising from the growth of gambling, minimise the likelihood of social problems and provide support for those who encounter gambling-related problems.

The Strategy provides the platform for the delivery and development of responsible gambling initiatives in a planned and coordinated manner. It is based on a public health framework which views problem gambling as a complex issue requiring multiple solutions. The public health framework underpinning the Strategy supports prevention, protection and rehabilitation initiatives that minimise the harmful impact of problem gambling. It identifies six priority action areas to promote responsible gambling and contribute to the reduction of problem gambling and its impacts. These priority action areas are:

1. Enhance responsible gambling policies and programs through research
2. Increase community knowledge and awareness of the impacts of gambling
3. Reduce the risk factors for problem gambling through early intervention
4. Develop a statewide system of problem gambling treatment and support services
5. Ensure gambling environments are safer and more supportive for consumers
6. Promote partnerships to address statewide and local gambling issues and concerns.

The *Queensland Responsible Gambling Code of Practice* (Code of Practice) is an initiative primarily addressing Priority Action Area 5 of the *Queensland Responsible Gambling Strategy*. This Priority Action Area aims to ensure gambling environments are safer and more supportive for consumers.

2.2 Queensland Responsible Gambling Code of Practice

The Queensland Responsible Gambling Advisory Committee (RGAC) developed the *Code of Practice* in consultation with key stakeholders. The RGAC comprises community, industry and Government representatives who provide advice to the Minister on minimising negative impacts of gambling and the development of a responsible gambling environment.

The *Code of Practice* was launched on 29 May 2002. It aims to ensure gambling environments are safe and supportive for gamblers, their families, friends and local communities. The *Code of Practice* commits the gambling industry to implement and adhere to responsible gambling practices, with a particular focus on consumer protection measures. These practices are organised into the following six broad categories:

1. Provision of information
2. Interaction with customers and community
3. Exclusion provisions
4. Physical environment
5. Financial transactions
6. Advertising and promotions.

The *Code of Practice* is based on a voluntary, whole-of-industry approach to the implementation and maintenance of practices that create safe and supportive gambling environments.

This voluntary approach encourages gambling providers to be innovative in the execution of practices and provides a positive incentive for gambling providers to exceed minimum standards and thus achieve best practice.

The overarching categories (listed above) in the *Code of Practice*, are supported by a further 36 sub-practices that define the standards expected in the provision of responsible gambling services in Queensland. The *Code of Practice* contains a majority of voluntary practices, as well as some that have legislative requirements. The *Code of Practice* is a dynamic document. Therefore developments in knowledge or new research may lead to the revision of existing practices, the development of new practices, or the legislation of practices that pose a risk to the sustainability of the *Code of Practice*.

The *Code of Practice* strives towards achieving:

- a shared understanding of responsible gambling by individuals, communities, the gambling industry and the Government;
- a clear understanding of rights and responsibilities in relation to responsible gambling practices by individuals, communities, the gambling industry and the Government;
- provision of safe and supportive environments for the delivery of gambling products and services by the gambling industry;
- assurance that customers can make informed decisions about their gambling practices;
- minimisation of harm from gambling to individuals and the broader community; and
- access to timely and appropriate assistance and information for people adversely affected by gambling.

In recognition of the diversity across the gambling industry sectors, the *Queensland Responsible Gambling Code of Practice Resource Manual* (the *Resource Manual*) was developed to support the implementation of the *Code of Practice*. The *Resource Manual* was developed by each industry sector in collaboration with the then Queensland Office of Gaming Regulation. It is a practical resource providing a step-by-step guide for each industry sector to assist in the implementation of the *Code of Practice*. It is also a platform to share best practice examples.

Since the *Code of Practice* and *Resource Manual* were launched in 2002, a number of resources and documents have been developed to assist gambling providers with implementing the *Code of Practice*. These include:

- Advertising and Promotions Guideline
- Industry Training Kit
- Training Framework for Industry
- Bookmakers Quick Guide¹
- Charitable and Non-profit Quick Guide
- Bingo Quick Guide
- Gambling Providers Contact Guidelines for Creating Links with the Local Gambling Help Service
- Gambling Help Services Contact Guidelines for Creating Links with Gambling Venues
- Information on Gambling Exclusions Brochure
- Wanna Bet? Signs
- Responsible Gambling Takeaway Cards
- Gambling Help Services Contact Details (generic and individual regional signs).

In addition to venue-specific resources, various brochures and signs have been developed based on the *Code of Practice*. These are used in communication campaigns at events such as industry expos and at the Royal Queensland Show to raise awareness of responsible gambling among Queensland residents.

¹ Quick Guides are condensed versions of the *Code of Practice* and *Resource Manual* and contain practical advice and examples on how to implement responsible gambling practices, aimed primarily at part-time and volunteer staff.

2.3 Review of the Queensland Responsible Gambling Code of Practice

In launching the *Code of Practice* and *Resource Manual*, the RGAC recognised that it would take time for all industry sectors to implement the numerous practices and for the subsequent effects to flow onto the community. As such, the *Code of Practice* has been reviewed over five years using the three phase model outlined in Table 1 below.

Table 1. Code of Practice review stages

Phase	Date	Purpose of the Review
Phase 1 Implementation Review	October 2002 – October 2003	Review the effectiveness of the implementation of the <i>Code of Practice</i> .
Phase 2 Cultural Shift Review	November 2003 - December 2005	Review the level of cultural shift towards establishing responsible gambling as a basic feature of running a gambling business.
Phase 3 Sustainability Review	January 2006 – December 2007	Review the sustainability of the <i>Code of Practice</i> in achieving best practice in responsible gambling and contributing to minimisation of the harm associated with problem gambling.

The three phase model recognises that ensuring ongoing commitment to the *Code of Practice* is a long-term process which faces unique challenges at each step.

2.3.1 Phase I – Implementation Review

The Implementation Review, covering the time period October 2002 to October 2003, investigated the broad uptake of the *Code of Practice* at the individual gambling provider level, and the maintenance of support from the gambling industry peak bodies, community groups and Government stakeholders. The Implementation Review evaluated the effectiveness of the uptake of the *Code of Practice* by:

- identifying new practices developed in response to innovative best practice within industry
- identifying amendments required to the *Code of Practice* and *Resource Manual*
- identifying where minimum standards may be recommended and, where appropriate, draft into legislation
- evaluating progress towards achieving the outcomes stated in the *Code of Practice*.

The primary findings from the *Report on the Implementation Review*² (QOGR 2004, pp. 3-5) were that the overall level of commitment to the *Code of Practice* averaged across the five industry sectors (clubs, hotels, casinos, lottery and racing) was 71%. The result identified a number of gambling providers who were exceeding their commitment to the *Code of Practice* by implementing best practice. Within the first 12 months, most gambling providers had put systems in place to ensure people adversely affected by gambling could access timely and appropriate assistance and information.

² Available from www.olgr.qld.gov.au

The *Report on the Implementation Review* (QOGR 2004, pp. 6-9) made a number of recommendations. They were to:

- maintain the voluntary approach to the *Code of Practice*
- identify and promote best practice across industry sectors
- develop strategies to encourage training on the effective implementation of the *Code of Practice*
- identify factors (for example, location and venue size) that hinder the implementation of the *Code of Practice*
- establish a system to deal with issues that cannot be resolved at the local level
- amend relevant aspects of the *Code of Practice* to reflect changing business practices, and update the *Resource Manual* accordingly
- improve the effectiveness of partnerships between gambling providers and Gambling Help service coordinators
- develop definitions of rights and responsibilities for each stakeholder group.

2.3.2 Phase 2 – Cultural Shift Review

The aim of the Cultural Shift Review, undertaken between November 2003 and December 2005, was to examine the extent to which responsible gambling practices had been adopted as a basic feature of running a gambling business. The review determined to:

- evaluate the level of cultural shift towards establishing responsible gambling as a basic feature of running a gambling business
- evaluate the progress towards achievement of the *Code of Practice* outcomes
- identify new practices that have been developed in response to innovative best practice within the industry
- identify amendments required to the *Code of Practice* and *Resource Manual*
- identify where minimum standards may be recommended and, where appropriate, drafted into legislation.

The *Report on the Cultural Shift Review*³ (QOGR 2007, p. 24) found that while awareness of the *Code of Practice* remained at 35%, communication strategies increased awareness of responsible gambling practices to 57%. Commitment to the *Code of Practice* continued to improve across the gambling industry indicating it was being accepted as a part of normal business practice for gambling providers (QOGR 2007, p. 9). Around 82% of hotels and 74% of clubs were assessed as committed (QOGR 2007, p. 33). A large proportion of small and micro clubs and hotels⁴, clubs and hotels in isolated regions, bingo operators and race clubs were not fully committed to the *Code of Practice* (QOGR 2007, p. 33). Yet, on the other hand, there was evidence that the activities designed to promote the implementation of safe and supportive environments, as promoted by the *Code of Practice*, predominantly attracted gambling providers already committed to the provision of responsible gambling (QOGR 2007, p. 36).

The *Report on the Cultural Shift Review* found consumer awareness and use of complaint handling procedures could be improved. While relationships between gambling providers and gambling-related support services had improved since the Implementation Review, a large proportion of clubs, hotels, bingo operators and race clubs did not have an established link with a local gambling-related support service (QOGR 2007, p. 46).

Community awareness that gambling problems can be discussed with a trained staff member at a gambling venue remained low (29%), with little improvement since the Implementation Review. Awareness was lower among people from culturally and linguistically diverse backgrounds (QOGR 2007, p. 53). While the first point of contact for 20% of problem gamblers was the gambling provider, there were no clear links between gambling providers and the gambling-related support services that help consumers with gambling problems (QOGR 2007, p. 9).

³ Available from www.olgr.qld.gov.au

⁴ Micro clubs and hotels are those with fewer than 20 electronic gaming machines (EGMs) and less than \$19 metered win per machine per day for the 2005 calendar year. Small clubs and hotels are those with less than \$200,000 metered win in the 2005 calendar year and not assessed as micro venues.

The *Report on the Cultural Shift Review* (QOGR 2007, pp. 10-11) made a number of recommendations. They were to:

- examine how to promote the *Code of Practice* in the Queensland community and with gambling consumers
- examine how to reinforce the importance of, and support for, ongoing training in responsible gambling practices within the club, hotel, racing and bingo sectors
- ensure that the RGAC maintain its commitment to developing and documenting comprehensive definitions of rights and responsibilities for each stakeholder group following the completion of the five year review period of the *Code of Practice* in 2007
- investigate how to increase commitment to the *Code of Practice* across small and micro clubs and hotels, clubs and hotels in isolated regions, bingo operators and race clubs
- explore options that will encourage gambling providers who are not committed to the *Code of Practice* to participate in activities designed to promote the implementation of safe and supportive gambling environments
- investigate whether consumers are sufficiently informed about the existence of current mechanisms for raising responsible gambling issues with gambling providers and the Government and whether such mechanisms are fit for purpose
- develop strategies to improve the engagement between clubs, hotels, bingo operators and race clubs, and gambling-related support services
- examine methods to ensure gambling-related services not funded by the Queensland Government (for example, Gamblers Anonymous) receive relevant information on the *Code of Practice*
- develop strategies to raise awareness and provide support services appropriate to culturally and linguistically diverse groups
- improve linkages between gambling providers and gambling-related support services for customers seeking assistance for gambling problems.

Actions resulting from recommendations made in the *Report on the Cultural Shift Review* are provided in Appendix 2.

The *Report on the Implementation Review* (QOGR 2004, pp. 7, 29) highlighted concerns about the absence of a transparent process to deal with complaints about the voluntary requirements of the *Code of Practice* that cannot be resolved at local level by the industry peak body. In spite of the initiation of a complaint handling procedure, the *Report on the Cultural Shift Review* (QOGR 2007, p. 39) found that of the 153 complaints recorded by the Government only 24% of them were generated by members of the public. This may indicate limited awareness of complaint procedures, or the resolution of complaints at the local level.

The *Report on the Cultural Shift Review* (QOGR 2007, p. 47) identified that many gambling providers had connections to support services such as Gamblers Anonymous, the Salvation Army and individual counsellors outside the government funded gambling-related support services. Other issues identified in the *Report on the Cultural Shift Review* were that there was limited awareness of the *Code of Practice* among adult Queenslanders, and that culturally and linguistically diverse groups were underrepresented as a proportion of the Gambling Help service clients and Gambling Help Line callers.

Some issues were consistently identified in both the Phase 1 and Phase 2 reviews, such as:

- There were lower commitment rates demonstrated by smaller providers such as small and micro clubs and hotels, and clubs and hotels in isolated regions, bingo operators and race clubs.
- The Implementation Review found that closer links were needed between industry and Gambling Help services. Again, while the Cultural Shift Review found that relationships between these groups had improved, a large proportion of clubs, hotels, bingo operators and race clubs had not established links with their local gambling-related support services. Some gambling-related support services also reported difficulties with establishing and maintaining relationships with gambling providers.

- Comprehensive stakeholder awareness of, and support for the links between gambling providers and gambling-related support services, was lacking. The tripartite approach to training represented best practice, and the *Report on the Implementation Review* (QOGR 2004) recommended this be encouraged. Significantly, in the *Report on the Cultural Shift Review* (QOGR 2007) training emerged as being critically important to ensure shared understanding among gambling employees, and improvements in this area were required in the club, hotel, bingo and racing sectors.

These key findings from the first two phases of the *Code of Practice* review have been considered in the Sustainability Review.

2.3.3 Phase 3 – Sustainability Review

The Sustainability Review of the *Code of Practice* was undertaken between November 2006 and December 2007 and its aim was to investigate whether the *Code of Practice* was positioned to achieve long-term responsible gambling practices that would efficiently and effectively minimise the harm associated with gambling.

2.4 The Sustainability Review

2.4.1 Aim

The aim of the *Report on the Sustainability Review* is to present the results of the review carried out between November 2006 and December 2007. It also refers to findings and recommendations reported in the previous *Code of Practice* review reports. The report will inform the Queensland Government, members of the RGAC and other relevant stakeholders about the whether the *Code of Practice* is positioned to achieve and maintain long-term responsible gambling practices that minimise the harm associated with gambling.

2.4.2 Objectives

The Sustainability Review evaluates the level of commitment to the practices within the *Code of Practice* in terms of the long term sustainability of responsible gambling as a basic feature of the gambling industry. Achievements were assessed against the key outcomes listed in the *Code of Practice* and described below.

The review also seeks to identify risks associated with practices, behaviours and environments that potentially impede commitment to the *Code of Practice*, and therefore, may impact on its long-term sustainability. Sustainability refers to industry led promotion and maintenance of long-term, resource effective and efficient responsible gambling practices. Such practices encourage economically and socially viable gambling by recognising the State and community benefits from gambling, and addressing the potential harm associated with gambling.

A reduction in the voluntary commitment of key stakeholders (Government, gambling industry and community) to core practices aimed at reducing the harm associated with gambling is viewed as the primary risk to the sustainability of the *Code of Practice*. Findings of all reviews undertaken in the preceding five years will be evaluated against the six *Code of Practice* outcome areas:

- Outcome 1: Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices.
- Outcome 2: Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices.
- Outcome 3: The gambling industry provides safe and supportive environments for the delivery of gambling products and services.
- Outcome 4: Customers make informed decisions about their gambling practices.
- Outcome 5: Harm from gambling to individuals and the broader community is minimised.
- Outcome 6: People adversely affected by gambling have access to timely and appropriate assistance and information.

2.4.3 Project benefits

The benefits of the Sustainability Review will be:

- Increased community confidence that the *Code of Practice* can minimise gambling-related harm
- Effective and efficient use of Queensland Government resources to measure and ensure that gambling is conducted in a responsible gambling environment
- The development of recommendations that will contribute to the long-term viability of the *Code of Practice*.

2.4.4 Scope

Data for the Sustainability Review was collected from stakeholders during the period January, 2006 through to December, 2007. The Phase 3 Sustainability Review targeted all gambling providers in Queensland in an evaluation of their commitment to the *Code of Practice* and whether this commitment is sustainable post-review. Gambling industry sectors included:

- Casinos
- Clubs
- Hotels
- Totalisator betting (UNiTAB)
- Keno
- Lotteries
- Racing
- Bingo
- Charitable and Non-Profit.

2.4.5 Inclusions & exclusions

Five main stakeholder groups were involved in the Phase 3 *Code of Practice* Sustainability Review: consumers, industry sector, community sector, the RGAC, and the Government. The following sources of information have contributed to the *Report on the Sustainability Review*:

1. Current sustainability activities
 - Regional Gambling Help services networks
 - Consultations with industry, community and Government
2. Surveys and Measurements
 - Queensland Responsible Gambling *Code of Practice* Phase 3 Survey
 - Gaming Machine Venue Survey
 - Compliance checklist
 - Data Collection for Phase 3 Project (industry, community and Government)
 - Industry checklist
 - Queensland Household Survey (QHS)
 - Queensland Household Gambling Survey (QHGS)
 - Responsible gambling breaches data (recorded by Office of Liquor and Gaming Regulation (OLGR) inspectors)
 - Responsible gambling issues from OLGR database
3. September 2007 RGAC Meeting and Regional Forum
 - RGAC Community Services and Industry Responsible Gambling Forum (RGAC Forum)
 - RGAC written submissions
 - RGAC focus group

4. Other supporting documents
 - Phase 1 Implementation Review
 - Phase 2 Cultural Shift Review
 - *Queensland Responsible Gambling Strategy*
 - *Resource Manual* and supporting guidelines
 - *Responsible Gambling Code of Practice*

The following are EXCLUDED from the Phase 3 Review:

- Broader social and economical impacts
- Post Phase 3 activities

A reference group convened as needed throughout the project has had an advisory role in the progress and direction of the final report. All issues regarding the production of the final report such as the interpretation of data or unexpected events have been addressed by the reference group.

2.5 Methodology

The Phase 3 Sustainability Review uses quantitative and qualitative data from a variety of sources to determine whether the *Code of Practice* is now embedded in venues as part of the long-term responsible gambling practices that will efficiently and effectively minimise the harm associated with gambling. Data was collected from five main stakeholder groups: consumers, industry sector, community sector, RGAC, and the Government.

The Phase 3 Sustainability Review recognises that sustainability will mean different things to these groups, not only because the groups have different functions, but also because they vary in the way they view their responsibilities individually, to one another and to the Queensland community. Diverse points of view will be assessed against the six key outcomes of the *Code of Practice* and thereby highlight whether the *Code of Practice* is sustainable in the future.

2.5.1 Data collection methods

Data that informed the Phase 3 Sustainability Review included population level gambling surveys, a number of industry, community and Government surveys, internal evaluations and reports, and qualitative forums, focus groups, written submissions ⁵ and interviews. Internally generated information from gambling compliance activity was also used. All statistical data analyses were conducted by the Office of Economic and Statistical Research (OESR), Queensland Treasury. The Report on *The Sustainability Review* also draws on data and research results from external research funded by the Government. Although some projects may not directly contribute to evaluating sustainability in the context of Phase 3, the results provide insight into the prominence of the *Code of Practice* and consequent impacts it has on industry and the community.

Industry sector

The *Queensland Responsible Gambling Code of Practice Phase 3 Survey* ⁶ (*Code of Practice Phase 3 Survey*) was the primary instrument used to collect data from the various industry sectors. The survey is based on practices in the *Code of Practice* and aims to assess levels of commitment to the *Code of Practice*. The *Code of Practice Phase 3 Survey* is based on areas within the *Code of Practice*, and each survey consists of a number of questions categorised according to the following classifications.

- Essential questions (category 1) have a significant impact on whether a gambling provider is considered to be committed to responsible gambling. These questions include those practices that have legislative backing, some of which potentially carry high penalties for non-compliance. If one essential question is not answered in accordance with minimum responsible gambling practices, a gambling provider is assessed as being not committed.

⁵ Qualitative forums, focus groups, written submissions and interviews are referred to in the report as stakeholder feedback/sessions 2007.

⁶ The *Queensland Responsible Gambling Code of Practice Phase 3 Survey* is the primary instrument used to collect data about the commitment of venues to the *Code of Practice*. Throughout this report it is referred to as the *Code of Practice Phase 3 Survey*.

- Important questions (category 2) individually are not considered essential indicators of a gambling provider's commitment. However, in combination they are considered an important indicator of commitment to responsible gambling. If a pre-determined number of important questions are not answered in accordance with responsible gambling practices, a gambling provider is assessed as being not committed.
- Supporting questions (category 3) contain more subtle question which provide qualitative information on a variety of areas. Supporting questions are not used to determine commitment to the *Code of Practice*.

While there are a total of 36 sub-practices which detail specific actions for the gambling provider, the survey asks general questions about the six main practices only, not the 36 sub-practices. Each question in the survey is weighted according to whether it is in the Essential, Important or Supporting category (outlined above).

Clubs and hotels

The survey was administered to a final number of 564 clubs and 762 hotels. Clubs and hotels were surveyed by telephone using Computer Assisted Telephone Interviewing (CATI) during April and May 2006.

Casinos

Four casinos were surveyed during April 2006. The survey was administered to two sites by face-to-face interview, and two sites by telephone. The survey results for casinos included results from Essential and Important questions, but not Supporting questions.

Totalisator betting

UniTAB branches and agencies (143) were surveyed by Remote Print, a function that allows UniTAB head office to print directly to all agencies and branches.

Lottery

The survey of Golden Casket agencies that provide the lottery services for Queensland was conducted by mail out during April 2006. Out of a total of 1115 agencies in Queensland, 315 were sampled.

Racing

The survey of race clubs was conducted by mail out during April 2006. Of 51 race clubs identified as being in-scope by peak bodies in the racing sector, Greyhound Racing Authority Queensland (greyhounds), Queensland Racing Limited (thoroughbreds), and Queensland Harness Racing Board (harness), only 18 who met during the data collection phase were able to complete the survey.

Bingo

Suppliers of bingo tickets in Queensland were approached to identify 367 bingo operators who were mailed a survey. Surveys were returned from 174 Queensland bingo operators (only 16 were surveyed in Phase 2⁷). Notably, a number of bingo operators were unaware of their commitments under the *Code of Practice*, and therefore felt unable to respond to some questions in the survey.

Additional sources of data for industry

The following data sources were used to gather supplementary information about the gambling industry.

The *Queensland Gaming Machine Venue Survey*⁸ is an annual statistical survey of approximately 1350 Queensland clubs and hotels that have electronic gaming machines. The survey is managed by the Office of Regulatory Policy (ORP) and is administered by the Office of Economic and Statistical Research (OESR), Queensland Treasury. The survey gathers information on various aspects of

⁷ Only 16 bingo providers were surveyed in Phase 2, therefore, longitudinal comparisons between Phase 2 and Phase 3 are not possible.

⁸ Queensland Gaming Machine Venue Surveys are available from www.olgr.qld.gov.au

the club and hotel gaming machine industry including revenue, employment, community support, products and services and responsible gambling.

The *Preliminary Trend Analysis: Survey of Queensland Gaming Machine Venues 2001-06* is based on the six surveys from 2001 to 2006 and included all Queensland clubs and hotels with operational gaming machines that had traded for the full 12 months of the previous financial year. The Trend Analysis aimed to determine general implications regarding the projects and policy work done by OLGR/ORP, and provide a framework for further investigations into specific trend areas in the future.

The *Responsible Gambling Code of Practice Phase 3 Survey (Code of Practice Phase 3 Survey)* provides information about the commitment levels of clubs and hotels to the Responsible Gambling Code of Practice. All Queensland clubs and hotels with gaming machines that had traded for the full 12 months of the financial year were included in the survey frame:

- 2005 - response rate 79% (1032 of 1306 venues responded)
- 2006 - response rate 83% (1070 of 1297 venues responded)
- 2007 - response rate 83% (1070 of 1297 venues responded).

Clubs and hotels

Phase 3 stakeholder feedback sessions with representatives from the clubs and hotels who provided their perceptions of the sustainability of the *Code of Practice* were held at:

- RGAC September 2007 meeting in Mackay
- Industry and community forums at the Gold Coast, Caboolture, Mackay, Townsville and Cairns (2007)
- Australian Leisure and Hospitality Group (ALH group) meeting in Brisbane (2007).

Other industry sectors

Phase 3 stakeholder feedback sessions were held with industry representative members of the RGAC during the RGAC forum of September 2007, and with representatives of other industry sectors including casinos, totalisator betting, keno, lotteries, racing, bingo and the charitable and non-profit sector.

For the purpose of the Sustainability Review, the community sector is classified into two main categories – the Queensland community in aggregate and gambling-related support services.

Queensland community in aggregate

Two quantitative surveys were used to collect data from the community sector:

1. *Queensland Household Survey (QHS)* gathers information from Queensland householders on a variety of topics, including issues related to gambling. The data contributing to this report were collected by the Office of Economic and Statistical Research (OESR) in June 2007 and May 2006 using telephone interviews with respondents 18 years and over in ten regions of Queensland and the Brisbane Statistical Division. The sample sizes were benchmarked and estimated to the total population.
2. *Queensland Household Gambling Survey (QHGS)* gathers information about gambling issues that concern the community, and monitors gambling activity and prevalence of problem gambling in Queensland. The survey was conducted by OESR. Stage 1 was administered from 18 September to 24 November 2006, and Stage 2 from 5 February to 2 April 2007 using telephone interviews with respondents 18 years of age and over. The final sample size was 30000 based on quotas from 30 regions.

Gambling-related support services

Data about gambling-related support services was gathered from:

- Quarterly reports of the Queensland Gambling Help Line
- Quarterly data from the Department of Communities on the use of Gambling Help services

- Phase 3 stakeholder feedback at the RGAC Forum in September 2007
- Phase 3 stakeholder feedback at forums held at the Gold Coast, Caboolture, Mackay, Townsville and Cairns (2007)
- Phase 3 stakeholder feedback with Gambling Help services in Brisbane (Relationships Australia), Townsville (Centacare) and Cairns (Lifeline). Organisations were given the opportunity to participate through written submissions (2007).

Consumers

The *Queensland Household Survey, 2007* (described above) is the primary source of data to assess the impact of the *Code of Practice* outcomes on consumers. The survey reports on gambling activity and also investigates consumer knowledge of responsible gambling signage, advertising, gambling help provisions and the *Code of Practice*.

Government

A range of data sources assessed the Government's role in supporting the implementation of the *Responsible Gambling Code of Practice*:

- Phase 3 stakeholder feedback sessions with Government inspectors (Brisbane, Brisbane South, Gold Coast, Townsville and Cairns) (2007)
- The *Code of Practice* issue database which records issues raised by inspectors or issues identified through surveys as well as those raised by gambling providers and members of the public
- The Corporate Office of Gaming System (COGS) database which records all compliance-related activity.

Data analysis

Data analysis was primarily outsourced to OESR as per individual project agreements in relation to other projects conducted throughout the Sustainability Review period.

2.5.2 Evaluation of the outcomes of the *Queensland Responsible Gambling Code of Practice*

During the Implementation Review (Phase I) an evaluation framework was developed to assess the progress of the *Code of Practice* towards the six outcomes that demonstrate achieving responsible gambling practices by Queensland gambling providers. The evaluation framework has performance indicators and performance measures for each outcome against which progress is measured. Achievement of the outcomes requires collective actions and shared ownership by consumers, communities, the gambling industry, the RGAC and Government. The performance measures, that have remained fundamentally the same across the five year review period, are organised to represent the appropriate stakeholder group.

The evaluation framework presents information related to the outcomes of the *Code of Practice* so that each section:

- Describes the outcome and its indicators
- Presents information related to each indicator
- Provides a summary that highlights areas of achievement and identifies areas for improvement, and
- Concludes with findings and recommendations (if required) for the specific outcome.

After five years of operation, these indicators should provide evidence of whether the *Code of Practice* has reached a level that will ensure its future sustainability - that is, industry-led promotion and maintenance of long-term, resource effective and efficient responsible gambling practices. Such practices encourage economically and socially viable gambling by recognising the State and community benefits from gambling, and addressing the potential harm associated with gambling.

Table 2: Queensland Responsible Gambling Code of Practice outcomes and performance indicators

Outcome 1	Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices.
Performance Indicators	Awareness of provisions of responsible gambling practices (consumers and community). Understanding of the shared role of community, industry and Government for implementation of responsible gambling practices (industry, community and Government). Extent of responsible gambling signage displayed or made available (industry and Government).
Outcome 2	Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices.
Performance Indicators	Definition and articulation of the rights and responsibilities for each stakeholder group (industry and Government). Implementation of responsible gambling practices (industry and Government). Implementation of customer complaint handling procedures (customers, industry and Government). Establishment and maintenance of gambling-related support services (community and Government).
Outcome 3	The gambling industry provides safe and supportive environments for the delivery of gambling products and services.
Performance Indicators	Implementation and maintenance of responsible gambling practices in each category of the Code of Practice (industry and Government). Implementation and maintenance of customer liaison services (industry). Implementation and maintenance of exclusions provisions (industry and Government).
Outcome 4	Consumers make informed decisions about their gambling practices.
Performance Indicators	Utilisation of exclusion provisions (consumers, industry and community). Awareness of information of the odds of winning and rules of games (industry). Awareness of the availability of support services (industry and community).
Outcome 5	Harm from gambling to individuals and the broader community is minimised.
Performance Indicators	Prevalence of problem gambling (consumers and community). Utilisation of exclusion provisions (consumers and community). Responsible gambling-related breaches of regulation requirements (industry and Government). Utilisation of gambling-related support services (consumers and community).
Outcome 6	People adversely affected by gambling have access to timely and appropriate assistance and information.
Performance Indicators	Effectiveness of links with gambling-related support services (community, industry and Government). Utilisation of gambling-related support services (consumers, community, industry and Government). Utilisation of exclusions provisions (consumers, community and industry).

3. Progress on the outcomes of the Queensland Responsible Gambling Code of Practice

3.1 Outcome 1: Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices.

Achievement against Outcome 1 of the *Code of Practice* was measured through the following three performance indicators:

1. Awareness of provisions of responsible gambling practices
2. Understanding of the shared role of community, industry and Government for Implementation of responsible gambling practices
3. Extent of responsible gambling signage displayed or made available.

3.1.1 Performance Indicator 1

Performance Indicator	Awareness of provisions of responsible gambling practices
Target Groups	Consumers and community
Performance Measures	Percentage of the community and consumers who are aware of responsible gambling practices

Consumer awareness of responsible gambling practices

The *Queensland Household Gambling Survey 2006-07* measured consumer awareness of the *Code of Practice* and responsible gambling practices and indicated that around 40% of the Queensland adult population had heard about the *Code of Practice*. This is a small increase on the previous rates of around 35% reported for both the *Implementation Review* and the *Cultural Shift Review* (QOGR 2007, p. 28). The *Queensland Household Survey 2007* reported that 52% of Queensland adults were aware that people could ask to be excluded or banned from a gambling venue, an increase over the 42% reported in *Queensland Household Survey 2005* (cited in QOGR 2007, p. 50).

The *Queensland Household Gambling Survey 2006-07* found that of those who had heard of the *Code of Practice*, the overwhelming number reported becoming aware from either television (30%), (although it is not promoted on television)⁹, or a gambling site (30%), and the least likely way of hearing about the *Code of Practice* was from the Internet (0.9%). People in the recreational (42%), low risk (53%), moderate risk (57%), and problem (52%) gambling groups were more likely than those in the non-gambling group (32%) to have heard about the *Code of Practice*.

Community awareness of responsible gambling practices

Awareness of responsible gambling practices was measured by the *Queensland Household Gambling Survey 2006-07* through asking whether people were aware of the Queensland Government's responsible gambling campaign. Reportedly, 42% were aware of the campaign and of those, 47% indicated they were more likely to have read or heard about it on television than by any other way. Gambling venue toilets, newspapers, and gambling venue or brochures were the next most likely sources, all at around 14%.

The *Queensland Household Gambling Survey 2006-07* found that of those who recalled seeing or hearing messages from the responsible gambling campaign, most agreed that 'the ad is easily understandable' (61%), and around half (51%) agreed that 'this ad is for problem gamblers, not me', and while 40% agreed that the ad caught their attention, only 9% agreed that 'it made me think about my gambling'.

⁹ The finding nominating 'television' should be interpreted with caution since the *Code of Practice* is not advertised on television. Responsible Gambling messages are not usually televised, although they may be shown on some regional broadcasts.

When respondents to the *Queensland Household Survey 2007* were asked whether they had seen or heard about any advertising encouraging people to gamble responsibly, 55% reported they had, with those aged 18 to 24 years (66%) more likely than other age groups to have seen or heard about this advertising. The *Queensland Household Survey 2007* also reported on promotion of Gambling Help services through the responsible gambling campaign collectively known as the *Wanna Bet?* Campaign. The key message of the campaign was 'If gambling has become more important than other things in your life – you have a problem', with a secondary message of 'Help is available.'

Just over 25% of the Queensland adult population recalled the *Wanna bet?* signage that was displayed in gambling venues and agencies, with those aged 18 to 24 years, and males more likely than females to have seen or read the signs. Of all adult Queenslanders who had seen or read the signs, 33% recalled them at a club, 31% at a hotel, 45% thought the messages were aimed at all people, regardless of whether they gambled or not, and 16% (with almost twice as many males as females) thought the messages were aimed at anyone who gambled. Around one quarter thought the messages were aimed at people who gambled and had experienced problems with gambling.

An independent evaluation by ACNielsen¹⁰ was commissioned by Government to assess the *Wanna Bet?* campaign. Among the participants were 24% low to moderate risk gamblers, and a further 2% identified as problem gamblers. The percentage of recall by respondents was lower in the *Wanna Bet?* campaign (27%) than the *Gamble Responsibly* campaign (38%). However, low to moderate risk gamblers were significantly more likely to recall the *Wanna Bet?* campaign than the general population. Recall of the messages was stronger for the under 45 year group than those who were older.

Gambling venues were mentioned as places where a significant proportion of Queensland adults had heard or read messages about responsible gambling, for example, on signs, posters, brochures, coasters and in toilets (*Queensland Household Survey, 2007*).

3.1.2 Performance Indicator 2

Performance Indicator	Understanding of the shared role of community, industry and Government for implementation of responsible gambling practices
Target Groups	Industry, community and Government
Performance Measures	<ul style="list-style-type: none"> • Extent to which knowledge is shared by each stakeholder group • Effectiveness of partnerships between gambling providers, gambling-related support services and Government

One of the areas identified in previous reviews of the *Code of Practice* as a risk for the *Code of Practice* was a lack of commitment by industry, community and the Government to their shared role in implementing responsible gambling practices. Currently, commitment to the *Code of Practice* is supported by:

- the tripartite relationship of the RGAC
- issue resolution procedures
- gaming audits and inspections
- Government availability for advice, information and assistance.

Phase 3 stakeholder feedback collected from inspectors and the Gambling Help services (2007) highlighted the difference between commitment and compliance. The inspectors, from their experience, found that some gambling providers viewed the *Code of Practice* as compliance to gain the licences to trade, rather than approaching it as a commitment to responsible gambling and the business culture in the gambling industry. In another context, the media tend to highlight the negative aspects of gambling, but do not show how gambling providers are implementing responsible gambling practices.

¹⁰ Unpublished report

Extent to which knowledge is shared by each stakeholder group

Training is critical to ensure that staff and key personnel in the gambling industry understand, implement and support all sub-practices within the *Code of Practice*. The extent to which knowledge is shared is measured through the level of communication and commitment to training that has occurred within and among stakeholder groups.

The Implementation Review found high levels of training across the five gambling industries assessed, attributed to the training campaign prior to the launch of the *Code of Practice*. Even so, small and micro clubs and hotels and gambling providers in remote regions had low commitment to training (QOGR 2007, p. 25). The *Report on the Cultural Shift Review 2007* (p. 26) found training in responsible gambling was received by staff at casinos (100%), Golden Casket (100%) and UNiTAB (77%), while the clubs and hotels reported lower levels of training among their gaming staff (50% and 55% respectively). Lower levels were found for employees of bingo operators (30%) and racing clubs (8%). The *Report on the Cultural Shift Review* reported the factors that prevented venues from providing responsible gambling staff training. They were:

- 49% noted that their small size made it difficult to send staff to training
- 37% believed they already had sufficient training
- 21% considered there were no training courses available
- 18% thought the costs of training were too great
- 16% said high staff turnover made it hard to maintain a trained workforce
- 15% said they did not have the available time (QOGR 2007, p. 27).

In several areas, industry peak bodies and Gambling Help services have begun to establish responsible gambling networks in order to meet and share knowledge of the *Code of Practice*. There is evidence of goodwill among members of these networks to support other venues with training and knowledge about, for example, exclusion procedures that may be infrequently required in smaller venues.

Training

In 2005, the Government together with industry and community representatives developed the Queensland Responsible Gambling Industry Training Kit (the Training Kit), which comprises a Training Workbook and a DVD. The Training Kit was distributed to all clubs and hotels providing gambling in the state. In 2006, the *Queensland Gaming Machine Venue Survey* included questions about perceptions of the Training Kit (pp. 177-179).

Around three quarters of venues reported receiving the Training Kit in 2006 (85% of large clubs, 71% of large hotels), although all venues were mailed a copy. A high proportion of venues (80% of clubs and 86% of hotels) had used the Training Kit to train staff, with 18% of clubs and 13% of hotels reporting they had not used the Training Kit.

Averaged across clubs and hotels, around 44% of venues found the Training Workbook and DVD equally helpful, similar to the 40% of venues that found the Training Workbook alone useful. By contrast, only 10% of venues found the DVD alone useful. Large hotels were more likely to find the Training Workbook and DVD equally helpful (46%) than the Training Workbook alone (32%). The small clubs, and small and medium hotels were more likely than larger venues to find the Training Workbook useful, with medium clubs and large hotels more likely to find the DVD useful than other venues. In all results reported for the questions about the Training Kit, there were no significant differences evident across regions.

Table 3. Components of the Responsible Gambling Industry Training Kit found useful for training purposes by venue type and size

	Clubs				Hotels			
	Large %	Medium %	Small %	Total %	Large %	Medium %	Small %	Total %
Training Workbook	37.7	36.1	49.5	42.3	31.9	45.5	41.0	38.5
Training DVD	10.3*	12.5*	6.1*	9.0	16.0	7.9*	6.6*	11.3
Both equally helpful	52.1	48.7	38.9	45.7	46.3	41.8	39.3	43.4
Neither were helpful	0.0	**	**	**	**	0.0	6.5*	1.5*
Don't Know	0.0	**	3.2*	**	4.1*	3.9*	**	4.2
Refused or missing	0.0	0.0	**	**	**	**	**	1.2*

Estimates with * have a relative standard error 25% to 50% and should be used with caution. Estimates with ** have a relative standard error of above 50% and should not be used.

Source: 2006 Gaming Machine Venue Survey

Responsible gambling staff training

The *Code of Practice Phase 3 Survey, 2006* found commitment to staff training was high in some sectors with casinos and UNiTAB at 100%, clubs and hotels averaging around 98% and lotteries at 97%. Bingo operators at 67% (previously 30%) and race clubs at 78% (previously 8% as reported in the *Report on the Cultural Shift Review 2007*, p. 26) demonstrated significant improvements in commitment levels.

The *Code of Practice Phase 3 Survey, 2006* for clubs and hotels provided figures for the number and percentage of staff trained in responsible gambling by region. The figures, highlighted in bold in Table 4 below, show that both clubs and hotels in the Moreton region had the highest levels of staff trained in responsible gambling (95% and 92% respectively). Most other regions had clubs and hotels with percentages of trained staff between 83% and 90%. Hotels in the South West region had higher levels (89%) than clubs in the same region which had the lowest level of trained staff of all regions (66%). In the Central West clubs had a higher level (83%) than hotels (78%). Notably, South West clubs and Central West hotels had low numbers of staff, and this may explain their difficulties in achieving complete training of all staff in those regions. Hotels and clubs in the North West also had low percentages of trained staff (77% and 78% respectively), which may be related to the remoteness of the region. Figures reported in the table highlight both the variability between regions, and variability between clubs and hotels in the same region.

Table 4. Number and percentage of staff trained in Responsible Gambling by region in clubs and hotels

	Clubs			Hotels			
Region	Total Staff	Trained Staff	% Trained	Region	Total Staff	Trained Staff	% Trained
Brisbane	1783	1583	88.78%	Brisbane	1716	1529	89.10%
Moreton	1429	1352	94.61%	Moreton	1220	1121	91.89%
Wide Bay-Burnett	438	408	93.15%	Wide Bay-Burnett	445	400	89.89%
Darling Downs	296	246	83.11%	Darling Downs	436	382	87.61%
South West	29	19	65.52%	South West	54	48	88.89%
Fitzroy	262	228	87.02%	Fitzroy	339	297	87.61%
Central West	46	38	82.61%	Central West	27	21	77.78%
Mackay	253	213	84.19%	Mackay	388	332	85.57%
Northern	138	121	87.68%	Northern	300	267	89.00%
Far North	244	226	92.62%	Far North	354	315	88.98%
North West	76	59	77.63%	North West	99	76	76.77%
Total Queensland	4994	4493	89.97%	Total Queensland	5378	4788	89.03%

Source: Code of Practice Phase 3 Survey (2006)

Around 22% of racing clubs did not provide responsible gambling staff training, and responsible gambling training was not provided by 33% of bingo operators (*Code of Practice Phase 3 Survey 2006*). The *Code of Practice Phase 3 Survey 2006* found that refresher training was provided at clubs (79%), hotels (81%) and racing (44%) and at three of the four casinos. Of those venues where refresher training was provided, 26% of clubs provided refresher training once a year with less frequent training at quarterly, twice yearly and monthly intervals. Around 27% of hotels provided refresher training monthly, with less frequent training quarterly, twice yearly and yearly. Over half of new gaming staff received responsible gambling training within the first three months (clubs 55%; hotels 56%) and over one quarter were trained prior to starting work in the gambling area (clubs 28%; hotels 34%) (*Code of Practice Phase 3 Survey, 2006*). While some gambling providers demonstrated high levels of initial training, 18% of clubs and 13% of hotels had not used the Training Kit (*2006 Gaming Machine Venue Survey*, p. 178). Training, as an industry-wide issue, requires attention to bring all gambling providers to a consistently high level and maintain commitment.

The *Code of Practice Phase 3 Survey (2006)* found that high percentages of both clubs and hotels (clubs 89%, hotels 95%) reported that either the Community Liaison Officer (CLO) or a trained staff member was available on-site at all times during the operation of gambling. The numbers of CLOs at venues varied with 44% of clubs and 41% of hotels having one, while 24% of clubs and 32% of hotels had two. Some 12% of clubs and hotels had three CLOs. The highest number of CLOs was eight for 0.13% of hotels, and ten for 0.35% of clubs. Almost 5% of clubs and 2% of hotels did not have a CLO. It remains an important issue for Government and industry peak bodies to stress the need for, and benefit to all gambling providers of having a CLO available at all gaming hours.

Stakeholder feedback sessions found that one of the risks to the sustainability of the *Code of Practice* was the need to maintain training. Some questions were raised about provision of training commensurate with the needs of boards of management and venue owners, and gaps in training

for betting stewards and casual staff at race meetings, and staff in the call centres of charitable and non-profit organisations. Training continues to be an issue of concern for staff and management, due to a lack of resources for some smaller venues, and in some sectors because of the high turnover of staff (Phase 3 Stakeholder Feedback, 2007).

Staff training in responsible gambling and refresher training frequency varied considerably across venue types, and while most stakeholders highlighted the preference for retaining voluntary training, it should be stressed that training is a requirement of the *Code of Practice*, and a variety of resource delivery methods are available. While small and remote venues may have difficulties with training, it is also possible for small venues to demonstrate best practice, and these successes should be showcased in government and industry newsletters to encourage commitment throughout the industry. In accordance with the *Code of Practice*, relevant owners, boards and managers should receive appropriate and current information to guide decision making in relation to responsible gambling.

In April 2008 the Queensland Government announced an enhanced harm minimisation initiative, introducing:

- a statewide cap on electronic gaming machines (EGMs) in clubs alongside a moratorium on the release of government operating authorities for hotel EGMs (until 30 April 2010)
- the introduction of mandatory training on the Responsible Service of Gambling (RSG) for venue employees involved in the delivery of gaming services
- an amendment to the *Gaming Machine Regulation 2002* to prohibit machine gambling before 10 am
- wider investigations into pre-commitment card-based gaming including a venue trial
- reinforcing a zero tolerance approach to venues allowing excluded persons who are known to a venue to gamble or directing gambling promotional material to excluded persons
- an examination of withdrawal limits for ATMs at venues
- a review of spin rates to ensure that Queensland remains consistent with other jurisdictions.

Training is critical for the successful implementation and maintenance of the *Code of Practice* and responsible gambling environments, and will be addressed by the introduction of mandatory RSG training. However, some providers, such as bingo and race clubs, will be outside the provisions of this training and will require support to maintain commitment to training.

Finding I

Commitment to training has been high in sectors where management structures are centralised. However, there is a disparity in the maintenance of ongoing training and the quality of training among smaller gambling providers, some of those with a decentralised management structure, and/or those in remote locations.

Recommendation I

Government and industry peak bodies are to continue to encourage best practice among gambling providers, in particular those outside the scope of the mandatory training that will be introduced for hotels and clubs.

Effectiveness of partnerships between gambling providers, gambling-related support services and Government

The RGAC continues to provide strategic support for the *Code of Practice* through the tripartite partnership of industry, community and Government. After the *Code of Practice Phase 2 Survey 2004* found that only 55% of clubs and hotels had an established link with their local gambling-related support service, a number of strategies were implemented during the Cultural Shift Review period to improve these relationships (QOGR 2007, p. 28). Among the strategies were facilitation of Industry and Community Network Forums for gambling providers throughout Queensland, Tabcorp's Responsible Gambling Awareness Week, participation in the 2005 Queensland Hospitality Expo, and requests for OLGR participation in meetings and conferences. The tripartite support of these events had continued during the Sustainability Review period.

The Gold Coast Responsible Gambling Network has demonstrated how regular meetings between industry and Gambling Help services in specific locations can maintain and improve communications about issues related to responsible gambling.

The *Code of Practice Phase 3 Survey, 2006* found the majority of gambling providers (91% for clubs and 94% for hotels) stated they were familiar with their local Gambling Help service. Commonly identified service organisations were Relationships Australia (by 25% clubs; 21% hotels), Gambling Help Line (by 19% clubs; 20% hotels), Lifeline (by 17% clubs; 15% hotels) and Gamblers Anonymous (by 12% clubs; 9% hotels). Lower responses were for services such as Salvation Army, Centacare and Interlock. Some 13% of clubs and 18% of hotels responded 'don't know' or 'can't remember'. While the data indicates that gambling providers are *familiar* with their local Gambling Help services, it does not clarify whether there is an effective working relationship in the spirit of the *Code of Practice* firmly established and maintained.

The Customer Liaison role supports the links between gambling providers and Gambling Help Service providers. The CLO provides appropriate information to assist customers with gambling problems, supports staff assisting those customers, and also assists staff with gambling-related problems. According to the *Code of Practice Phase 3 Survey, 2006*, the most common position held by the person nominated to speak to customers and staff about exclusions and problem gambling in clubs was the manager (63%) followed by the nominee (32%) and the assistant manager (14%). For hotels, the most commonly nominated person was the manager (68%) followed by the gaming nominee (24%) and the assistant manager (19%). Having the nominated person available at all times during the operation of gaming with was high at 93% of clubs and 95% of hotels.

There is still a need to regularly promote that Gambling Help services are an essential component for the successful operation of the *Code of Practice*. In some areas, there are good relationships established between industry and Gambling Help services, and the Gold Coast Responsible Gambling Network, in particular, is an example of how strong relationships can benefit industry and Gambling Help services as they work together to promote responsible gambling, share knowledge of *Code of Practice* issues, and identify and assist smaller venues. Responsible gambling champions have been a consolidating factor in achieving success in some areas.

Booklets developed by Government have been available for both Gambling Providers and Gambling Help services to support the process of establishing links (*Gambling Providers Contact Guidelines for Creating Links with the Local Gambling Help Service*, and *Gambling Help Services Contact Guidelines for Creating Links with Gambling Venues*). However, Phase 3 Stakeholder feedback sessions noted that while there were positive improvements in the relationships between gambling providers and their local Gambling Help services, there were still reports of connections not being strongly established. This may imply that the role and involvement of the Gambling Help services may not be fully understood in some areas. The *Code of Practice* clearly requires gambling providers to establish these links.

Finding 2

The Responsible Gambling network operating on the Gold Coast demonstrates how industry and Gambling Help service providers can work effectively together to share information, knowledge, training and resources for the benefit of all stakeholders in specific locations.

Recommendation 2

Industry peak bodies are to ensure that gambling providers know their responsibilities under Practice 2.1 of the *Code of Practice* (Community liaison), and collaborate with the Gambling Help network to promote the benefits that linkages between venues and Gambling Help services provide to venues, staff and customers.

3.1.3 Performance Indicator 3

Performance Indicator	Extent of responsible gambling signage displayed or made available
Target Groups	Industry and Government
Performance Measures	Level of commitment to displaying responsible gambling signage Take-up rate of takeaway cards Effectiveness of responsible gambling signage

Level of Commitment to Displaying Responsible Gambling Signage

The Implementation Review found the ongoing use of take away cards was an issue (QOGR 2004, p. 40), and OLGR reinforced, through a number of strategies, the importance of having the cards available. The *Report on the Cultural Shift Review* noted that 95% of clubs and hotels, 88% of bingo venues and 82% of race clubs had procedures in place to ensure take-away cards are restocked (QOGR 2007, p. 30). The *Code of Practice Phase 3 Survey 2006* collected information about commitment to the provision of responsible gambling signs and take-away cards by gambling providers.

The *Code of Practice Phase 3 Survey 2006* found high levels of commitment for casinos, and UNiTAB (both at 100%) for displaying responsible gambling signs and take-away cards. Lotteries had 100% commitment for displaying responsible play signs. Of racing and bingo operators surveyed racing had a commitment level of 83%, and bingo 71% to providing responsible gambling signs and take-away cards. Ninety-seven per cent of hotels and clubs surveyed in the *Code of Practice Phase 3 Survey 2006*, were committed to providing responsible gambling signs and take-away cards.

The *Code of Practice Phase 3 Survey 2006* also provided details on whether venues advertised and promoted gambling responsibly. Around 43% of clubs and 45% of hotels reported they did, indicating that slightly more than half of venues were not demonstrating commitment to the *Code of Practice* in this area. Some 63% of hotels and 52% of clubs reported that they included a responsible gambling message in their advertisements and promotions. The majority (slightly over 96%) of club and hotel venues did not offer free credits on gaming machines.

Effectiveness of Signage

The *Code of Practice* requires gambling providers to supply information about the risks associated with gambling, and about the most effective placement of various signs in order to assist consumers make informed decisions about their gambling.

Results of the *Queensland Household Survey 2007*, estimated that, of Queensland adults aged 18 years and over, 55% have seen or heard advertising for people to gamble responsibly. People aged 18 to 24 years (66%) were more likely than people aged 55 to 64 years (50%) to have seen or heard about this advertising. Around 61% had heard about the Gambling Helpline phone number, with those in the 18 to 24 years group more likely than others to have heard or read this information. Around 25% of the Queensland adult population had seen or read a sign promoting Gambling Help services using the phrase *Wanna Bet?* as featured on signs in gambling venues. The highest rates were for people in the 18 to 24 years age group at 34%, who were more likely than other groups to have seen or read these signs (25 to 34 years, 29%; 35 to 44 years, 32%; 45 to 54 years, 21%; 55 to 64 years, 19%; and 65 years or more, 17%).

Independent market research undertaken by ACNielsen for the Government about player information and signage in venues focused on the Player Information Board, Player Information Guide, and Exclusions Brochure. Key findings from gambling providers and customers were that:

- there was too much signage in venues, and current communication messages can be lost
- because signage is rarely changed in venues, it becomes ‘part of the wallpaper’ and is less effective than a number of different signs that could be rotated, and
- particular areas that are away from the gambling area, where customers sit and converse may be more effective sites for the placement of take away player information.

There was evidence of strong general recall of the Player Information Board, particularly the dominant helpline information, but little awareness of the player information section. The information in the Exclusions Brochure was thought to be generally useful for all customers; however the visual appeal was low, with the meaning of ‘exclusions’ not readily understood. Strategic placement in high and low-traffic areas of venues may improve the take up of the brochure. Projects are currently underway within Government to consider how to improve player information and increase the effectiveness of the exclusions brochure as an industry tool.

Signage was raised by industry as an issue in the majority of Phase 3 stakeholder feedback sessions in regard to the overwhelming numbers of signs that were required, and the resulting message fatigue and loss of impact on customers. Stakeholders reported that the ‘where to get help’ signs and the small business cards were successful. Notably, it was felt that there was a lack of information about how to undertake exclusions, and a lack of knowledge among some staff about the role of the CLO in the exclusion process. Other points were that:

- there were language issues for CALD customers¹¹
- ineffective and inappropriate display of signage lessens its benefit
- there was a lack of information in venues about how electronic gaming machines work
- inspectors believed that signs about returns to players had little impact
- there was a risk that a lack of, or ineffective responsible gambling signage will impact on the awareness of the responsible gambling environment.

Finding 3

There is a high level of commitment to the display of responsible gambling signage. However, the effectiveness of signage, information content, and message placement should be improved.

Recommendation 3

The RGAC, industry and Government are to explore ways to ensure that signage in venues is effective in size, content and placement for all consumers, including those from Culturally and Linguistically Diverse (CALD) communities.

3.1.4 Outcome 1: Summary

Individuals, communities, the gambling industry and the Government have a shared understanding of responsible gambling practices

At the time of the Cultural Shift Review, there were increasing levels of awareness of the *Code of Practice* and of responsible gambling among adult Queenslanders. Gambling providers demonstrated a commitment to displaying responsible gambling signage. Nevertheless, evaluation of the signage found that messages were poorly structured and transmitted. New responsible gambling signage has been subjected to ongoing evaluation to monitor its effectiveness.

The Sustainability Review reported from the *Queensland Household Gambling Survey 2006-07* that around 40% of the Queensland adult population had heard about the *Code of Practice*, and 42% were aware of the responsible gambling campaign. Those in the 18 to 24 years group were more likely than other age groups to recall responsible gambling advertisements and specific messages from the *Wanna Bet?* campaign. Although commitment to training had improved since the Cultural Shift Review, the frequency of refresher training was inconsistent across industry sectors. A high proportion, around 90% of clubs and 95% of hotels had a CLO available on-site to provide information about responsible gambling for staff and patrons (*Code of Practice Phase*

¹¹ Projects within Government are underway to provide CALD communities with access to Gambling Help services.

3 Survey, 2006). Harm minimisation initiatives to be introduced by the Government will address training, an issue that has been consistently raised in all three *Code of Practice* review Phases.

Although around 92% of clubs and hotels reported being familiar with their local Gambling Help service providers, 13% of clubs and 18% of hotels could not name their provider (*Code of Practice Phase 3 Survey, 2006*). Feedback from stakeholders suggested that there was not industry-wide commitment to gambling providers initiating relationships with their local gambling-related support services and fully engaging with them (Phase 3 Stakeholder Feedback, 2007). The Gold Coast Responsible Gambling Network demonstrates the growing self-sufficiency of industry and Gambling Help services to maintain a shared understanding of the *Code of Practice*. Similar networks established between industry and Gambling Help services in other areas of Queensland have the potential to provide assistance to small and remote venues that experience *Code of Practice* issues.

The *Queensland Household Survey 2007* found that 55% of the Queensland adult population were aware of the Government's responsible gambling campaign, and 61% had heard of the Gambling Help Line phone number. The high commitment level to the display of responsible gambling signage in the Cultural Shift Review continued to improve during the Sustainability Review period, although the effectiveness of messages and information, and their strategic placement and availability require attention to ensure that the impact of messages is not lost.

3.2 Outcome 2

Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices

Achievement against Outcome 2 of the *Code of Practice* was measured through four performance indicators:

1. definition and articulation of the rights and responsibilities for each stakeholder group
2. implementation of responsible gambling practices
3. implementation of customer complaint handling procedures
4. establishment and maintenance of gambling-related support services.

3.2.1 Performance Indicator 1

Performance Indicator	Definition and articulation of the rights and responsibilities for each stakeholder group
Target Groups	Industry and Government
Performance Measures	Development and documentation of definitions of rights and responsibilities for each stakeholder group

Development and documentation of definitions of rights and responsibilities for each stakeholder group

The *Code of Practice* seeks to ensure that 'Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices'. If the interests of all stakeholders are to be protected, definitions of rights and responsibilities (in the context of the *Code of Practice*) must be established. Defining these terms, and sharing a common understanding of how they function in the Queensland gambling context, will help promote and maintain relationships between stakeholders and ultimately enhance the shared commitment to ethical behaviours that aim to minimise the harm associated with problem gambling.

The *Report on the Implementation Review* (2004) recommended that the RGAC develop and document the rights and responsibilities of each stakeholder group (Recommendation 9, pp. 8, 43). The *Report on the Cultural Shift Review* (2007), recommended that the RGAC maintain its commitment to develop and document the comprehensive definitions of rights and responsibilities following the completion of the five year review period (Recommendation 3, pp. 10, 32).

Preliminary definitions of rights and responsibilities were developed and circulated to the RGAC for discussion and the RGAC (RGAC, December, 2007) agreed that a Working Party be established to develop and document the specific rights and responsibilities of industry stakeholders. The definitions proposed and endorsed were:

'Rights and responsibilities are a consequence of some agreed mutual purpose. In this case, it is the collective actions and shared ownership by individuals, communities, the gambling industry and Government to minimise the harm associated with problem gambling'.

'Rights' are claims that have some moral or legal justification behind them. Rights specify acts that are permitted, mandatory, prohibited. They therefore serve as rules of interaction between individuals or groups and, as such, place constraints and obligations upon the actions of these individuals or groups'.

*'When we talk about **responsibility**, we usually mean that a group or an individual is entrusted with achieving or maintaining a good (or positive) result in some matter. This group or individual has the relevant knowledge, skill and capacity to make a diligent effort to achieve the desired outcome'.*

Finding 4

The Responsible Gambling Advisory Committee (RGAC) endorsed the definitions of Rights and Responsibilities and formed a working party to develop and document the specific rights and responsibilities of industry stakeholders.

Recommendation 4

An RGAC Working Party is to continue to develop, document and update the rights and responsibilities of all stakeholder groups.

3.2.2 Performance Indicator 2

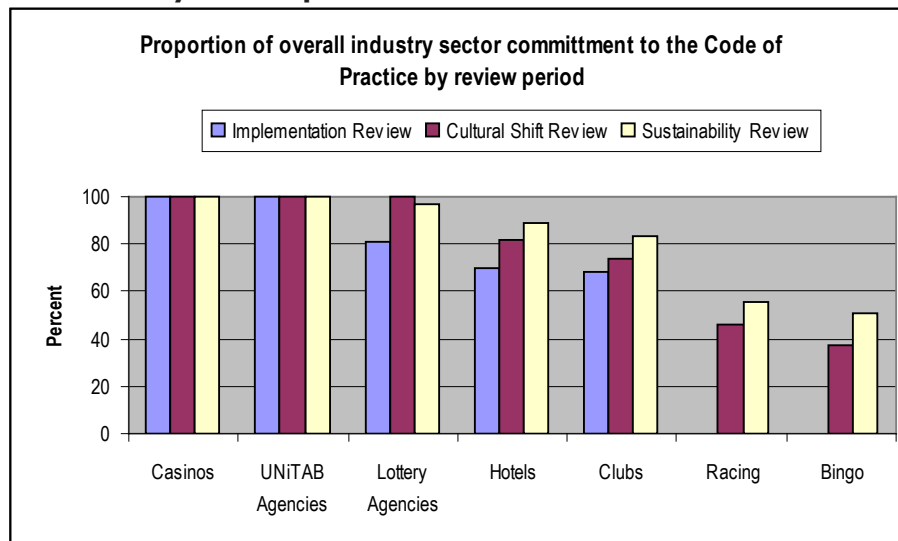
Performance Indicator	Implementation of responsible gambling practices
Target Groups	Industry and Government
Performance Measures	<ul style="list-style-type: none"> • Proportion of gambling providers committed to implementing responsible gambling practices • Proportion of gambling providers maintaining their commitment to the <i>Code of Practice</i>

Proportion of gambling providers committed to implementing responsible gambling practices

A major responsibility of gambling providers is to implement and incorporate the responsible gambling practices in the *Code of Practice* into their business in a way that demonstrates commitment to responsible gambling practices.

The Implementation Review found that 71% of gambling providers surveyed across the five industry sectors achieved the 70% that was nominated as a suitable level to measure commitment of industry sectors (QOGR 2004, p. 47). The level was increased to 75% for the Cultural Shift Review and was surpassed with 77% of gambling providers demonstrating commitment (QOGR 2007, p. 39). The Sustainability Review found commitment to the *Code of Practice* (illustrated in Table 5 below) was either maintained or increased in each industry sector during the five year review period, indicating a growing awareness among gambling providers of their responsibility to maintain responsible gambling practices. Further, this increase in commitment suggested that the practices contained in the *Code of Practice* were becoming more embedded in the business practices of gambling sectors, and therefore, likely to indicate long-term sustainability.

Figure 1. Proportion of overall industry sector commitment to the Code of Practice by review period



Source: Code of Practice Phase 1, 2, 3 Surveys

The Report on the Cultural Shift Review (QOGR 2007, p. 33) reported that casinos and totalisator betting agencies maintained a 100% commitment for the Phase 1 and 2 Surveys. Lottery agencies increased commitment from 81% to 100%, hotels increased from 70% to 82%, and clubs from 68% to 74%. Racing reported a commitment level of 45% and Bingo 38%.

The 2006 Phase 3 Survey that measured commitment for the Sustainability Review found continued improvements in overall industry wide commitment to the *Code of Practice*. Casinos and UNiTAB maintained 100% commitment, with lotteries similar at 97%.

Commitment of hotels was 89%, and clubs 83%. Some 56% of racing clubs that completed the survey and 51% of bingo providers who completed the survey were assessed as committed in the 2006 Phase 3 Survey. However, comparisons cannot be made between Phase 2 and Phase 3 Surveys because of the differences in numbers of participating providers surveyed in each phase. For example, 11 race clubs were surveyed in Phase 2, and although 51 were identified as being in-scope, 18 were able to participate in Phase 3; and 16 bingo operators were surveyed in Phase 2, while 174 were surveyed in Phase 3.

Bingo representatives participating in the Phase 3 stakeholder feedback thought gambling was not an issue for them because of the small amounts of money involved and the many small operators. Organisations used club facilities for bingo and relied on the coverage of the clubs' responsible gambling resources. However, with the future developments in bingo, and a larger prize pool, it is likely that the appeal of bingo will increase. If there is an increase in patronage of bingo games, bingo providers will need to be more aware of responsible gambling issues.

The commitment of all industry sectors to the *Code of Practice* is, therefore, essential. Quick Guides have been developed by Government to assist bingo operators and bookmakers with knowledge of their responsibilities to provide a safe and supportive environment for customers. Typical input from industry representatives participating in Phase 3 stakeholder feedback (2007) was that the *Code of Practice* was working, that it was well balanced and well positioned for the future, and embedded in regular business practice. It was generally felt that the *Code of Practice* provided a level playing field for industry, and a level of credibility demonstrating how things work, and, when embedded into business practices, can also provide a competitive advantage.

Commitment of clubs and hotels for Phase 1, 2 and 3 Surveys

The table below presents the commitment levels by venue size for clubs and hotels from the Implementation Review and Cultural Shift Review (QOGR 2007, p. 34).

Table 5. Proportion of clubs and hotels committed to the Code of Practice by venue size across review periods

Venue Size	Clubs		Hotels	
	Implementation Review	Cultural Shift Review	Implementation Review	Cultural Shift Review
Large	117 (85%)	137 (96%)	200 (80%)	245 (93%)
Medium	88 (70%)	110 (85%)	153 (73%)	198 (83%)
Small	96 (63%)	108 (65%)	117 (56%)	163 (72%)
Micro	57 (51%)	65 (49%)	8 (47%)	10 (50%)
Total	358 (68%)	420 (74%)	478 (70%)	616 (82%)

Source: Report on the Cultural Shift Review (QOGR 2007, p. 34)

The *Phase 3 Survey* examined venue's commitment to the *Code of Practice*. The overall commitment status of the 564 clubs that completed the survey was 83%. Overall commitment status of the 762 hotels that completed the survey was 89%. Commitment status of venues was reported by size and is outlined below.

Table 6. Commitment status of clubs and hotels by venue size

Commitment Status (100% of all surveys received)	Clubs			
	Micro	Small	Medium	Large
Committed	87	119	111	149
Not committed	27	30	25	16
Percentage committed	76.32%	79.87%	81.62%	90.30%
Total	114	149	136	165

Commitment Status (100% of all surveys received)	Hotels			
	Micro	Small	Medium	Large
Committed	7	123	220	329
Not committed	1	28	30	24
Percentage committed	87.50%	81.46%	88.00	93.20%
Total	8	151	250	353

Source: Phase 3 Survey

The *Phase 3 Survey* also examined venue's commitment to the *Code of Practice* based on location.

Table 7. Proportion of clubs and hotels committed to the Code of Practice by Statistical Division January 2006-December 2007 based on 564 clubs and 762 hotels that were assessed in Phase 3

Location	Clubs	Hotels
South West	80%	73%
Moreton	85%	87%
Mackay	76%	89%
Brisbane	81%	92%
Northern	69%	96%
Darling Downs	86%	91%
Far North	80%	85%
Wide-Bay Burnett	85%	86%
Fitzroy	87%	93%
Central West	78%	67%
North West	100%	86%

Source: 2006 Phase 3 Survey

The Implementation Review findings suggested that venue location in geographically isolated regions and small and micro size may impact negatively on levels of commitment. Across all review periods, isolated regions, for example, North West and Central West have had the lowest rates of commitment.

As the five year review period is now complete, there is a risk that without some way to continue to measure venue commitment, there will be a decline in the commitment status of some gambling providers. It is not feasible (or sustainable) for the Government to continue to administer commitment surveys to the extent that they have been used during the five year review period. Building questions on responsible gambling into existing industry checklists may potentially assist with monitoring commitment. Options for the future establishment of commitment to the *Code of Practice* should be explored.

3.2.3 Performance Indicator 3

Performance Indicator	Implementation of customer complaint handling procedures
Target Groups	Consumers, industry and Government
Performance Measures	Proportion of gambling providers with a customer complaints handling procedure Number of <i>Code of Practice</i> complaints recorded by the Office of Liquor, Gaming and Racing

Proportion of gambling providers with a customer complaint handling procedure

Complaint handling procedures are essential to ensure that aggrieved customers of gambling providers have an avenue to lodge complaints and to ensure that they are effectively investigated. The Implementation Review found that only 68% of clubs and hotels had implemented a complaints resolution mechanism, but this was thought to be because of a misunderstanding of the terminology. The recommendation of the *Report on the Implementation Review* (QOGR 2004, p. 7) was to change the wording of the *Code of Practice* from 'complaints resolution mechanism' to the more user-friendly term 'complaint handling procedures'.

The *Report on the Cultural Shift Review* (QOGR 2007, pp. 37, 38) provided the following information about the proportion of venues demonstrating commitment to providing complaint handling

procedures by venue size: Clubs: Large - 96%, Medium - 92%, Small - 82%, Micro - 76%. Hotels: Large - 96%, Medium - 90%, Small - 86%, Micro - 70%. The overall total for clubs and hotels was 89%. The Cultural Shift Review found all four casinos, UNiTAB, and lottery agencies had maintained complaint handling procedures since the Implementation Review, while 82% of bingo venues and 64% of race clubs had established complaint handling procedures. While the Cultural Shift Review found a high level of commitment to these procedures, it was thought that since only 7% of gambling providers had noted a complaint that the procedures may not be clearly promoted (QOGR 2007, p. 44).

The *Queensland Household Survey 2007* asked 'If a gambling provider or venue was not providing gambling products and services in a responsible manner, where would you go to make a complaint?' Only 17% of the estimated Queensland adult population would go to the venue or location to make a complaint, 10% would go to the Queensland Government. The largest percentage - 39% - were those who did not know where to go, and this suggests there is a need for better promotion of the *Code of Practice* and the ways in which members of the community can identify *Code of Practice* requirements and lodge a complaint if a gambling venue is not providing a responsible gambling environment.

Finding 5

Respondents answering questions about complaint handling procedures did not have a high awareness of their ability to raise complaints about gambling venues not providing responsible gambling environments.

Recommendation 5

Industry, community and Government are to explore ways to ensure customers have access to information about how to make a complaint if they have concerns about responsible gambling.

Number of *Code of Practice* complaints

As a key stakeholder, the Government has a responsibility to establish and maintain complaint handling procedures.

During the Sustainability Review (between January 2006 and December 2007) there were 65 issues related to the *Code of Practice* received by OLGR and recorded in the issues database. This is less than the 153 issues noted during the Cultural Shift Review, and less than the 555 issues reported during the Implementation Review. The decreasing trend is an indicator of gambling providers' understanding of, and commitment to the *Code of Practice*. During the Sustainability Review issues were raised by the general public (21), gambling provider (17), internal contact (18), external contact (5), and peak body (5). Several *Code of Practice* issues related to inappropriate or questionable advertising (often in local newspapers), signage that misrepresented the probability of winning, and venue promotions.

Stakeholder feedback (2007) noted that the few providers who inappropriately used external advertising disadvantaged the vast majority of providers who complied with the guidelines. How to undertake exclusions was also among the issues raised by gambling providers. The issues predominating during the Sustainability Review were similar to those raised in the Cultural Shift Review (Advertising and Promotions and Exclusions). Most complaints and queries were resolved through consultation with OLGR or via peak body clarification of issues with gambling providers. The new OLGR database will collect and record all breaches in the future, enhancing the role of the regulator for managing responsible gambling issues.

In regard to general population views about gambling advertising, the *Queensland Household Survey 2007* reported that around a third (34%) of Queensland adults believed there was too much advertising of gambling products or services. People aged 65 years or over (45%) were more likely than those aged 18 to 24 years (18%) to think there was too much advertising of gambling products and services. Of those who believed there was too much advertising, 49% believed gambling machines, poker machines, and/or jackpots were advertised too much, and 24% believed the lottery was advertised too much. The age group 25 to 34 years (63%) were more likely than those aged 65 years and over (42%) to think that gaming/poker machines and

jackpots were advertised too much. People who identified as Indigenous (79%) were also more likely than people who did not identify as Indigenous (48%) to consider that gaming machines, poker machines and/or jackpots were advertised too much.

Phase 3 stakeholder feedback sessions (2007) found that issues around Advertising and Promotions and Exclusions were risks for the sustainability of the *Code of Practice*. While most venues comply with the *Gaming Machine Act* requirement that gaming does not dominate on external signage of a licensee's premises, it was possible that some inappropriate advertising had occurred inadvertently. Gambling Help services and OLGR Compliance Inspectors reported that some gambling providers exploited the ambiguity around the advertising guidelines, managing the 'dominance' of gambling messages in external signage rather than promoting responsible gambling. Many gambling providers who work within the guidelines felt disadvantaged by the few venues who worked around them. Assessing whether gambling was dominant in signage was also a subjective matter. Internal promotions were also an area where customers could be encouraged to gamble longer. It may be an option to limit gambling signage so that it occupies less than 15% of the cumulative area of external signage of venues.

As stated in the *Code of Practice*, the Government retains the right to legislate in any area of gambling at any time. In Victoria, for example, a person must not display or cause to be displayed any gaming related sign, and gaming machine related advertising via all forms of media is banned. In New South Wales, a person must not publish or cause to be published any gaming machine advertising (publishing includes via cinema, video, radio, electronics, the internet and television).

Finding 6

The *Advertising and Promotions Guideline* was developed to assist industry, yet breaches continue to occur, and complaints are received about inappropriate advertising that is outside the Act and the spirit of the *Code of Practice*.

Recommendation 6

As this issue is being examined in a significantly wider strategic context, it is recommended that, in addressing this issue, the Government has regard for the recommendations of the evaluation of the *Queensland Responsible Gambling Strategy* in this area.

3.2.4 Performance Indicator 4

Performance Indicator	Establishment and maintenance of gambling-related support services
Target Groups	Community and Government
Performance Measures	Maintenance of the Gambling Help Line and Gambling Help services

Gambling-related support services are provided as an essential part of harm minimisation and consumer protection measures. The State Government funds 14 Gambling Help services that provide face-to-face counselling, a 24 hour, seven days a week Gambling Help Line, and inpatient and outpatient services offered by the Moonyah Alcohol and Drug Rehabilitation Centre. The Gambling Help Service System is funded by the Department of Employment, Economic Development and Innovation, with services provided through the Department of Communities and Queensland Health in accordance with a Memorandum of Understanding.

An independent evaluation of the Gambling Help Service System in 2006 resulted in several recommendations, and these are currently being progressed by Government.

They include:

- redesign of the performance management framework for Gambling Help services, and the development of a supporting, monitoring and evaluation framework
- improvements to the Gambling Help services data management system that will assist
- in understanding problem gambling issues and why and how people seek help
- establishment of secretariat support for the Gambling Help network
- further expansion of the Gambling Help services throughout the state

Government projects are underway to explore and research strategies that will provide Indigenous and CALD communities with access to Gambling Help services. In addition, a suite of self-help resources is being developed as an adjunct to face-to-face counselling. The availability of diverse and supplementary sources of assistance, for example, self-help brochures and online counselling, will provide alternatives for those experiencing gambling-related problems, and may be preferred options for some excluded customers not accessing (for a variety of reasons) their local Gambling Help services.

3.2.5 Outcome 2: Summary

Individuals, communities, the gambling industry and the Government have an understanding of their rights and responsibilities in relation to responsible gambling practices

The *Report on the Cultural Shift Review* (QOGR 2007, p. 12) recommended that the RGAC maintain commitment to developing and documenting comprehensive definitions of rights and responsibilities for each stakeholder group. During the time of the Sustainability Review the RGAC committed to a Working Party to finalise definitions of rights and responsibilities for industry stakeholders.

The *Report on the Cultural Shift Review* found high commitment to the *Code of Practice* for all casinos, lottery agencies and totalisator betting agencies. Approximately 82% of hotels and 74% of clubs were assessed as committed to the *Code of Practice*. Low commitment levels were found among small and micro clubs and hotels, clubs and hotels in isolated regions, bingo venues and race clubs.

The Sustainability Review found commitment to the *Code of Practice* had been maintained or increased across all sectors since the Cultural Shift Review, with hotels increasing commitment levels to 89% and clubs to 83%. This finding suggests that the *Code of Practice* is being embedded in business practices of gambling venues. Racing at 56% and bingo at 51% are above previous levels, although not comparable because of survey number differences. Notably, if bingo becomes highly commercialised with large jackpots, this sector may require more attention to commitment.

With the 2007 Queensland Household Survey noting that only 17% of the Queensland adult population would go to a gambling venue to make a complaint and 39% did not know where to go, there is a need to promote complaint handling procedures. Most complaints are resolved by OLGR or via peak bodies liaising with gambling providers. Issues of concern that have been recorded by OLGR, and noted by Gambling Help services, continue to be in the advertising and promotions and exclusions areas.

Gambling Help services continue to be maintained and improved, with all recommendations from an independent review being addressed. Implementation of recommendations will enhance performance and data management, support for, and expansion of the Gambling Help services.

3.3 Outcome 3

The gambling industry provides safe and supportive environments for the delivery of gambling products and services

The *Code of Practice* is organised into six broad categories, each of which consists of a series of practices (thirty six in all) focusing primarily on customer protection measures.

Achievement against Outcome 3 of the *Code of Practice* was measured through three performance indicators:

1. implementation and maintenance of responsible gambling practices in each category of the *Code of Practice*
2. implementation and maintenance of customer liaison services
3. implementation and maintenance of exclusions provisions.

3.3.1 Performance Indicator I

Performance Indicator	Implementation and maintenance of responsible gambling practices in each category of the Code of Practice
Target Groups	Industry and Government
Performance Measures	Proportion of gambling providers committed to implementing responsible gambling practices

Proportion of gambling providers committed to implementing responsible gambling practices

According to the *Results of the Queensland Survey of 2006 Gaming Machine Venue* (QOGR, 2007) most venues (94%) believed responsible gambling practices provided a supportive environment for customers. Small clubs (88%), medium hotels (91%) and small hotels (89%) scored lower than the large hotels (98%) and large (99%) and medium (98%) clubs. The *2007 Gaming Machine Survey* found most venues (96%) believed responsible gambling provided a supportive environment for customers, with increases for large (100%), medium (99%) and small (93%) clubs, and large (98%), medium (94%) and small (96%) hotels. In 2006, some 81% of clubs and 84% of hotels believed responsible gambling practices were good for business, increasing to 90% of clubs and 88% of hotels in 2007.

The *2006 Survey of Gaming Machine Venues* reported that around 88% of large clubs, 83% of medium clubs, and 76% of small clubs thought responsible gambling promoted sustainability of the gambling industry, while 94% of large hotels, 75% of medium hotels and 77% of small hotels thought so. The *2007 Survey of Gaming Machine Venues* found a similar percentage of clubs (86%) and hotels (87%) believed that responsible gambling promoted sustainability of the gaming industry.

Gambling Help services and Government inspectors noted issues with the cashing of cheques. However, it was the positioning of ATMs that created issues for all stakeholder groups for different reasons. Industry favoured situating ATMs for customer convenience and security, Gambling Help services were concerned about easy access to ATMs for problem gamblers, and inspectors noted there were individual interpretations of 'close proximity' by gambling providers (Phase 3 Stakeholder Feedback Sessions, 2007). Enhanced gambling harm minimisation initiatives to be introduced by Government will include an examination of withdrawal limits for ATMs at gambling venues.

The main data source that assessed gambling providers' commitment to implementing responsible gambling practices for the sustainability review was the *Code of Practice Phase 3 Survey, 2006*. Gambling providers were assessed on their responses to essential, important and supporting questions.¹² The following section reports results of the *Code of Practice Phase 3 Survey, 2006* for each of the provider categories.

Casinos

There are four casinos in Queensland: Conrad Jupiters, Conrad Treasury, the Reef Casino and Jupiters Townsville. The casino sector operates in a highly regulated environment and all casinos have high standards of regulatory compliance and infrastructure that facilitates the successful implementation of most practices. The *Code of Practice Phase 3 Survey, 2006*, required commitment to six essential questions and a minimum of 14 out of 17 important questions. There were also 16 supporting questions. Overall the sector was assessed as 100% committed.

UNiTAB

There were 143 Queensland UNiTAB agencies that returned surveys (133 agencies and 10 branches) based on four essential questions, five important questions and 11 supporting questions. Familiarity with local Gambling Help services in the important questions category was an area requiring improvement. A high level of commitment to essential questions, registered at 100%, was noted across all agencies and branches, facilitated by the centralised management structure of UNiTAB.

¹² Essential, important and supporting questions are explained fully in the methodology section of this report.

Racing

Eighteen race clubs (Greyhound, Thoroughbred, and Harness) completed the *Code of Practice Phase 3 Survey*, based on seven essential questions, seven important questions and 17 supporting questions. Ten (56%) were assessed as committed and eight (44%) as not committed, with staff training, refresher training and familiarity with the local Gambling Help service being areas needing improvement. The overall commitment rate at 56% was higher than the 46% rate in the Phase 2 Survey which was based on 11 race clubs.

Bingo

The bingo sector characteristically involves small operators. The sector has a low membership in their peak body, and many use volunteer staff. Of the 174 bingo operators who completed the *Code of Practice Phase 3 Survey, 2006*, 51% were assessed as committed. There were six essential questions, seven important questions and 14 supporting questions for bingo operators. (The commitment rate is above the 38% reported in *Code of Practice Phase 2 Survey*, however, comparisons cannot be made because only 16 providers were surveyed in Phase 2).

Lotteries

The *Queensland Household Gambling Survey 2006-07* found that lottery products continued to be the most popular form of gambling for 62% of the population participating in gambling, slightly lower than the 67% of the Queensland adult population found in the 2003-04 survey. The *Code of Practice Phase 3 Survey, 2006*, surveyed 315 agencies in Queensland, and assessed 97% committed to the *Code of Practice*. Lotteries are assessed using five essential questions, three important questions and four supporting questions.

Clubs

Of the 564 clubs that completed the *Code of Practice Phase 3 Survey, 2006*, 466 were assessed as being committed to the *Code of Practice*. Clubs were surveyed using five essential questions, 14 important questions and 20 supporting questions. Overall commitment was around 83%, increasing from 68% in Phase 1 and 74% in Phase 2. Commitment status varied among the clubs according to size, with large clubs (90%) being more committed than micro clubs (76%). Overall commitment has increased from 68% in Phase 1 and 74% in Phase 2.

Table 8. Commitment status by size of venue - Clubs

Commitment Status (100% of all surveys received)	Clubs			
	Micro	Small	Medium	Large
Committed	87	119	111	149
Not Committed	27	30	25	16
Percentage Committed	76.32%	79.87%	81.62%	90.30%
Total	114	149	136	165

Source: Code of Practice Phase 3 Survey (2006)

The essential question with the highest failure rate was about having staff trained in responsible gambling available at all times of gambling operation for 61 clubs (11%). The two important questions with the highest fail rates were for encouraging breaks in play at 36% of clubs, and staff responsible gambling refresher training at 21%.

Ninety eight clubs were assessed as not committed to the *Code of Practice* through failing at least one essential criterion, or at least four important criteria. Seventy one clubs failed on only one essential question and would otherwise have been committed. The question with the highest fail rate was onsite availability of trained staff at 46 clubs (65% of the 71 clubs that failed on a single question).

Hotels

Seven hundred and sixty two Queensland hotels completed the *Code of Practice Phase 3 Survey, 2006*, with 89% assessed as committed. Hotels were assessed on five essential questions, 14 important questions and 20 supporting questions. The commitment rates varied slightly according to size with large hotels having 93% of venues committed and small hotels with 81% committed.

Table 9. Commitment status by size of venue - Hotels

Commitment Status	Hotels			
	Micro	Small	Medium	Large
Committed	7	123	220	329
Not Committed	1	28	30	24
Percentage Committed	87.50%	81.46%	88.00%	93.20%
Total	8	151	250	353

Source: Source: Code of Practice Phase 3 Survey (2006)

There were failures for important questions on encouraging breaks in play (21%, or 158 hotels), and staff refresher training in responsible gambling (19%, or 143 hotels). However, the commitment status of venues has increased from 70% in Phase 1, to 82% in Phase 2 and 89% in Phase 3.

There is evidence of increasing commitment to the *Code of Practice* by most gambling providers. A reduction in the voluntary commitment to core practices aimed at reducing the harm associated with gambling is a risk to the *Code of Practice's* sustainability. With the end of the formal five year review process, there will be greater reliance on industry checklists. However, it is important to consider how industry commitment to demonstrating best practice, in the context employed in the *Code of Practice Phase 1, 2 and 3 Surveys*, can be measured at some time in the future. Commitment should still be monitored in some way so that issues related to region, location and venue type and size can be noted and assistance provided where necessary through industry peak bodies, supporting networks or Government.

Finding 7

Ongoing measurement of industry commitment to the *Code of Practice* is essential, as are processes to identify best practice in demonstrating the *Code of Practice* philosophy of continuous improvement.

Recommendation 7

Government is to consult with industry to establish a systematic process to measure industry's voluntary commitment to the *Code of Practice* and to identify best practice.

3.3.2 Performance Indicator 2

Performance Indicator	Implementation and maintenance of customer liaison services
Target Groups	Industry
Performance Measures	<ul style="list-style-type: none"> Proportion of gambling providers who have nominated customer liaison officers Availability of staff members to liaise with customers and staff on gambling issues Proportion of gambling providers who have established links with gambling-related support services

Proportion of gambling providers who have nominated customer liaison officers

The *Code of Practice* (Practice 2.2, Customer liaison role) recommends that gambling providers nominate a customer liaison officer to assist customers and staff with information in regard to responsible gambling practices. In relation to exclusions, it is important for venues to have at least one staff member who can fulfil the role of Customer Liaison Officer (CLO) and be available during venue trading hours.

The responsibilities of CLOs include:

- discussing and facilitating exclusions arrangements with customers
- providing staff with training and assistance when dealing with exclusions
- providing necessary exclusion forms and updating the exclusion register as necessary
- establishing and maintaining contact with local gambling counsellors and CLOs at other local venues, and
- maintaining confidentiality of information recorded about customers.

The *Report on the Implementation Review* (QOGR 2004, p. 47) showed that 82% of clubs and hotels were committed to providing a customer liaison officer to assist customers and staff with information in regard to responsible gambling practices. This commitment was reported as 94% in the *Report on the Cultural Shift Review* (QOGR 2007, p. 44). The *2006 Phase 3 Survey* found approximately 95% of clubs and 98% hotels reported having a nominated person available at all times to speak to patrons and staff regarding exclusions and problem gambling.

The Sustainability Review found that the numbers of CLOs in clubs (564 venues) and hotels (762 venues) was one in 44% of clubs and 41% of hotels, followed by two in 24% of clubs and 32% of hotels, and three in 12% of clubs and hotels. There were considerably lower responses for numbers above three. Clubs and hotels recording that they did not have a CLO were minimal (5% and 2% respectively).

The percentage of trained staff in venues by region showed highest rates in Moreton (95% clubs, 92% hotels) and Wide-Bay Burnett (93% clubs, 90% hotels). Other regions were similar, however, the lowest rate of trained staff in the clubs sector was in the South West (66%), and the lowest rate for the hotel sector was in the North West (77%). The remoteness of some regions and subsequent difficulties encountered in sending staff to training may have impacted on these figures (*Code of Practice Phase 3 Survey, 2006*). The enhancements to harm minimisation initiatives proposed by Government will introduce mandatory training for the responsible service of gambling for employees of clubs and hotels involved in the delivery of gaming services.

Availability of staff members trained in responsible gambling to liaise with customers and staff on gambling issues

Having staff trained in responsible gambling available at all times means that the venue is able to give a timely and effective response to customers who may be adversely affected by gambling. This is a key measure of the implementation and maintenance of customer liaison provisions.

Commitment to this practice, measured in the *2006 Code of Practice Phase 3 Survey*, was generally high, and higher than in the Phase 2 Survey, with racing, UNiTAB, lotteries and casino sectors always having an officer trained in responsible gambling available during operating hours. The hotel sector reported a commitment level of 95%, followed by clubs at 89%. The bingo sector displayed commitment to this practice at around 72%, higher than the 36% reported in the *Report on the Cultural Shift Review* (QOGR 2007, p. 46), but not comparable (16 providers participated in Phase 2, and 174 providers participated in Phase 3).

Proportion of gambling providers who have established links with gambling-related support services

The role of the CLO is to maintain links with gambling related support services. Commitment to this practice was generally high, although the number of venues that continued to maintain these links was not as high as desirable.

The *Code of Practice Phase 3 Survey, 2006* found that approximately 91% of clubs and 94% of

hotels were familiar with their local Gambling Help service. The most common gambling help organisations mentioned were Relationships Australia (25% clubs, 21% hotels) followed by Gambling Helpline (19% clubs, 20% hotels) and Lifeline (17% clubs, 15% hotels). However, while they could identify various providers of gambling help services, quite a large percentage of venues (18% of hotels and 13% of clubs) were unable to name their particular local Gambling Help service.

The feedback about this area of the *Code of Practice* in the Phase 3 stakeholder feedback sessions carried out in 2007 highlighted positive improvements in establishing relationships between venues and gambling-related support services, with large clubs being most likely that other sized clubs to engage with their local Gambling Help services. Gambling Help services in some areas, such as the Gold Coast and Townsville, were seeing positive responses. Larger clubs in Wide Bay were also likely to engage with Gambling Help services. However, while some Gambling Help services were building successful relationships with industry, others were experiencing difficulties with establishing relationships. This situation could have been due to a variety of circumstances, including the remoteness of venues from service centres, and/or the transience of the gaming labour market that disrupts favourable relationships that may have been developed.

While commitment to this area of the *Code of Practice* is high in terms of gambling providers being familiar with their local providers of gambling-related support services, the concern is that relationships may not be maintained strongly to ensure that people adversely affected by gambling have access to timely and appropriate assistance and information.

Finding 8

The lack of established, effective, statewide links between gambling providers and local Gambling Help services is a risk for the *Code of Practice*.

Recommendation 8

The RGAC is to explore new ways of strengthening relationships between gambling providers and Gambling Help services.

3.3.3 Performance Indicator 3

Performance Indicator	Implementation and maintenance of exclusion provisions
Target Groups	Industry and Government
Performance measures	Proportion of gambling providers who have implemented exclusion procedures

Proportion of gambling providers who have implemented exclusion procedures

The *Gambling Legislation Amendment Act 2004* introduced a framework for exclusions that applies to casinos, clubs, hotels and totalisator betting and supports the exclusion provisions of the *Code of Practice*. While casinos had an exclusions regime prior to 2005, in other sectors, all exclusion provisions were of a voluntary nature through the *Code of Practice*. The legislative framework requires that when presented with a self-exclusion notice by a customer, the casino, club or hotel must provide a self-exclusion order thus prohibiting the customer from entering or remaining in either the entire licensed venue or only the gaming machine area.

The 2006 *Gaming Machine Venue Survey* of clubs and hotels asked respondents about the range of resources they used to provide their employees with training on the new exclusions regime. As the table below shows, around half (49%) of Queensland venues had used their industry association and almost half again (45%) used the *Responsible Gambling Resource Manual*. More venues sought training with either a Gambling Help service provider or the Office of Liquor, and Gaming Regulation than those who did not seek training at all, or those who used another source. There were few differences across regions.

Table 10. Resources utilised for staff training on new exclusion provisions by venue type and size

	Clubs				Hotels			
	Large %	Medium %	Small %	Total %	Large %	Medium %	Small %	Total %
Responsible Gambling Resource Manual (Practice 3 Exclusions)	47.5	38.2	41.5	42.5	53.9	44.5	35.5	47.7
Industry Association (Clubs Queensland and Queensland Hotel Association)	72.0	58.3	42.5	55.2	45.4	45.0	44.1	45.0
Gambling Help service provider	21.6	9.6*	9.2	13.0	20.5	10.1	6.5*	14.5
Queensland Office of Gaming Regulation (now Office of Liquor and Gaming Regulation)	16.5	17.4	16.2	16.6	20.3	13.6	16.0*	17.3
No training sought	2.6*	5.2*	16.6	9.7	4.4*	8.9*	15.1*	7.9
Other	7.1*	**	2.6*	3.5*	8.8	3.8*	**	5.9

Estimates with a * have a relative standard error of 25% to 50% and should be used with caution.

Estimates with ** have a relative standard error above 50% and should not be used.

Source: 2006 Gaming Machine Venue Survey

The 2006 Gaming Machine Venue Survey also found that a majority of venues had completed either a self-exclusion or venue initiated exclusion with hotels (58%) more likely to have completed an exclusion than clubs (41%). More large clubs (68%) and hotels (74%) had completed an exclusion than medium (39%) and small (23%) clubs, and medium (51%) and small (30%) hotels. There were few regional differences, although Fitzroy was lower (39%) than Northern and Darling Downs (both around 51%), Moreton (52%) and Brisbane (54%).

Clubs and hotels were more likely to have used the *Responsible Gambling Resource Manual* to assist in completing the exclusion process than to have used any other resource. Equivalent numbers of respondents had positive or negative experiences of exclusions under the new regime (2006 Gaming Machine Venue Survey).

The current figures for gambling-related exclusions by providers were analysed and presented in the publication *Report on Problem Gambling Exclusions in Queensland May 2005 to June 2007*. The report covers four periodical return periods during this time. The completed exclusions reporting process found that, with the exception of some smaller and remote clubs and hotels with gambling activities, all had successfully implemented the new exclusions regime in their

venues. Table 11 below provides the overall number of problem gambling-related exclusions reported as at June 2007, the greatest number being self-exclusions.

Table 11. Summary of exclusions related to problem gambling for May 2005-June 2007

Gambling operators	Self-exclusion orders	Venue exclusion Directions of problem gamblers	Estimated number of individuals*
Clubs and Hotels	2517	34	1122
Casinos	450	7	456
UNiTAB agencies, Telebet	545	4	40
Total	3512	45	1618

* Estimates of individuals based on initials, gender and date of birth as unique identifiers as provided by the gambling providers.

Source: Report on Problem Gambling Exclusions in Queensland May 2005-June 2007

To further explore the number of exclusions, Table 12 below provides an analysis of exclusions based on the number of operational gaming machines in the venues reporting those exclusions. The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* notes that a greater proportion of hotels at 60% have reported exclusions compared to 40% of clubs. Twice as many exclusions had been reported by hotels compared to clubs, which might be due to a greater participation rate in hotels as opposed to clubs, or a higher volume of play – more frequent and for longer periods – that impacts on players' concerns about their gambling.

Table 12. Relationship between club/hotel electronic gaming machine (EGM) categories and exclusions for May 2005-June 2007

Venue EGM category	Percentage of total number of venues	Percentage of venues with exclusions	Number of exclusions	Percentage of all exclusions
Hotels 1-20	26%	35%	292	2%
Hotels 21-40	32%	80%	1412	55%
All Hotels	58%	60%	1704	67%
Clubs 1-20	24%	21%	137	5%
Clubs 21-50	10%	42%	169	7%
Clubs 51-100	3%	78%	136	5%
Clubs 101-200	4%	88%	292	12%
Clubs >200	1%	100%	113	4%
All Clubs	42%	40%	847	33%

Source: Report on Problem Gambling Exclusions in Queensland May 2005-June 2007

Demographic differences were noted when comparing the local government areas with 30 or more exclusions per 10000 population for the May 2005-June 2007 reporting time frame. The four local government areas with over 30 exclusions per 10,000 adult population were Toowoomba, Gladstone, Bundaberg and Mount Isa (see Table 13 below, column 'Exclusions per 10,000 adult population'). Further investigation would be required to find reasons for the higher numbers of exclusions in these areas. It is possible to speculate that specific geographic and employment factors, and/or the work of Gambling Help service providers assisting individuals with exclusions may impact upon the exclusion figures. For instance, Mt Isa's higher incidence of exclusions might

be associated with high disposable income levels and/or distorted by non-resident gamblers in a mining area. Awareness raising activities by Gambling Help services, and the establishment of effective relationships between gambling providers and Gambling Help services in some areas, may also influence the numbers of exclusions undertaken.

Table 13. Local government areas with > 30 club and hotel exclusions in May 2005-June 2007

Local government area [City (C)] [Shire (S)]	Number of exclusions based on venues' Local Government Area	Estimated adult population August 2006	Exclusions per 10,000 adult population
Brisbane(C)	497	746,936	7
Toowoomba (C)	219	61,735	35
Gold Coast (C)	228	333,971	7
Gladstone (C)	104	18,708	55
Bundaberg (C)	111	32,020	34
Maroochy (S)	102	101,196	10
Townsville (C)	93	65,901	14
Cairns (C)	78	85,065	9
Noosa (S)	61	33,488	18
Logan (C)	99	110,898	8
Mount Isa (C)	70	1,943	59
Redland (S)	60	88,623	7
Hervey Bay (C)	82	38,100	21
Ipswich (C)	57	90,605	6
Pine Rivers (S)	56	91,989	6
Caboolture (S)	52	89,532	6
Caloundra (C)	45	63,054	7
Rockhampton (C)	36	39,679	9

Source: Report on Problem Gambling Exclusions in Queensland May 2005-June 2007

Feedback about the exclusion provisions of the *Code of Practice* through stakeholder feedback sessions in 2007 suggested that some staff found it difficult to understand the exclusions legislation and the exclusion procedures. Government continues to receive calls from venues wanting to know how to undertake exclusions, or to confirm that they are following the correct procedures. The role of the CLO is critical for providing assistance for exclusions and stakeholders thought that many venues were active in providing this support for customers requiring help to self-exclude. Where effective relationships were established, Gambling Help services could, if required, provide assistance with kits that assisted in understanding how to undertake exclusions.

The 2006 *Gaming Machine Survey* asked gambling providers for their perceptions of the effectiveness of exclusions to assist with harm minimisation. Almost half of clubs and hotels (46%) thought exclusions were very effective, 35% thought they were somewhat effective, and 10% of clubs and 8% of hotels thought exclusions were not effective. There were no regional differences in the perceptions of the effectiveness of exclusions.

Availability of staff to assist with exclusions and problem gambling

The *Code of Practice Phase 3 Survey, 2006*, asked clubs (564 venues) and hotels (762 venues) about the position of the person nominated to speak to patrons and staff about exclusions and problem gambling. For both clubs and hotels this was more often the manager (clubs 63%, hotels 68%), followed by the nominee (clubs 32%, hotels 24%) and the assistant manager (clubs 14%, hotels 19%). While the CLO was the least likely mentioned as being nominated to speak to staff regarding exclusions and problem gambling (only 0.89% in clubs and 1% in hotels), this was most likely due to the manager and the CLO being one and the same person. The *Phase 3 Survey, 2006*, found that 95% of hotels and 93% of clubs had staff available to handle exclusion requests.

The *Code of Practice Phase 3 Survey, 2006*, found that racing, UNiTAB, lotteries and casino sectors always had an officer trained in responsible gambling available during operating hours, the 95% of hotels and 89% of clubs committed to this practice. Of bingo operators surveyed, around 72% had on-site availability of trained staff at the time of the *Code of Practice Phase 3 Survey, 2006*¹³.

The Phase 3 stakeholder feedback sessions found training in exclusions was raised as a problem issue complicated by the high turn-over of staff in the industry, and misunderstandings about the exclusions process on the part of industry and customers. According to the *Queensland Household Survey 2007* only 11% of the Queensland adult 'at risk' population had tried to exclude themselves from a venue. Those in the problem gambling group (41%) were more likely to have attempted to exclude themselves than those in the low (7%) and moderate (16%) risk gambling groups. There were no significant regional differences.

Finding 9

There is evidence of a lack of understanding among some staff about how to undertake an exclusion.

Recommendation 9

As exclusions processes were developed by industry in conjunction with the Gambling Help services network, the Government supports industry peak bodies and the Gambling Help Services network in identifying ways to improve training in exclusions and the role of the Customer Liaison Officer and simplify the process of exclusions.

3.3.4 Outcome 3: Summary

The gambling industry provides safe and supportive environments for the delivery of gambling products and services

The *Report on the Cultural Shift Review* (QOGR 2007, p. 57) noted that some gambling venues had not demonstrated a cultural shift, that is, they had not incorporated the *Code of Practice* as a feature of running a gambling business.

The *2007 Gaming Machine Venue Survey* noted that of the venues surveyed, 96% believed that responsible gambling practices provided a supportive environment for customers, and 90% of clubs and 88% of hotels thought they were good for business. The *Phase 3 Survey* reported improving levels of commitment levels with casinos and UNiTAB at 100%, lotteries 97%, clubs 83%, hotels at 89%, racing 56% and bingo 51%.

The 2006 *Phase 3 Survey* found that casinos, lottery and totalisator betting maintained 100% commitment to having an in-house CLO to provide support for gamblers experiencing problems, with around 89% of clubs and 95% hotels committed to having someone trained in responsible gambling available during operation hours. While some small and micro venues had nominated a CLO, this person was not available at all times of gambling activity. Some 91% of clubs and 94% of hotels were committed to establishing links with their local gambling help provider, yet bingo and racing sectors had relatively low commitment to establishing links to gambling-related support services.

¹³ 174 Queensland bingo providers participated in the Phase 3 survey 2006. As only 16 bingo providers were surveyed in Phase 2 survey, meaningful comparisons are not possible.

Onsite availability of staff to assist gamblers who are experiencing gambling-related problems was noted as an issue that lacked industry-wide commitment, as was encouraging breaks in play and refresher training. Staff knowledge of the role of the CLO was an area that needed to be addressed, as was the area of the *Code of Practice* that requires gambling providers to establish links with their local Gambling Help services. As small and remote venues experienced difficulties, there is the potential for Gambling Help services and industry peak bodies to encourage the establishment of networks to link remote locations, support the circulation of information, and provide advice on *Code of Practice* issues.

The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* reported that there were an estimated 1,618 individuals who has sought exclusions. Toowoomba, Gladstone, Bundaberg and Mt Isa reported having over 30 exclusions per 10,000 of adult population. Throughout the review period, exclusions have been identified as a problem area of the *Code of Practice* with casinos having difficulty identifying excluded people among large numbers of customers in their venues. Small venues experience problems because of a lack of exposure to undertaking exclusion procedures. Government still receive calls from gambling providers about how to undertake an exclusion. The Government review of the exclusion framework will examine options and address issues around exclusions.

3.4 Outcome 4: Consumers make informed decisions about their gambling practices

Achievement against Outcome 4 of the *Code of Practice* was measured through three performance indicators:

1. utilisation of exclusion provisions
2. awareness of information of the odds of winning and rules of games
3. awareness of the availability of support services.

3.4.1 Performance Indicator 1

Performance Indicator	Utilisation of exclusion provisions
Target Groups	Consumers, Industry and Community
Performance Measures	Consumer awareness of exclusion provisions

Consumer utilisation of exclusion provisions

Within the Queensland community, there is an increasing awareness that people can be excluded from a gambling venue. The *Queensland Household Survey 2007* reported that 52% of Queensland adults were aware that people can ask to be excluded or banned from a gambling venue. This figure was higher than all figures reported since the Implementation Review. The proportions of people aware of the ability to self-exclude increased with age grouping, for example, 38% of 18 to 24 years, 43% of 25 to 34 years, 49% of 35 to 44 years, 54% of 45 to 54 years, 66% of 55 to 64 years, and 63% of 65 years or over (*Queensland Household Survey 2007*).

The *Report on Problem Gambling Exclusions in Queensland May 2005 – June 2007* provided the monthly rate of exclusions in the table below. Since individuals may undertake several exclusions, the total number of exclusions exceeds the number of individuals. In the period between January 2006 and June 2007 there was an average of 433 individuals per quarter who were excluded.

Table 14. Problem gambling exclusions for May-December 2005, January-June 2006, July-December 2006, and January-June 2007

	Number of exclusions				Number of individuals			
	May-Dec 2005	Jan-Jun 2006	July-Dec 2006	Jan-Jun 2007	May-Dec 2005	Jan-Jun 2006	July-Dec 2006	Jan-Jun 2007
Clubs and Hotels	937	555	560	432	537	362	314	268
Casinos	153	124	93	110	153	124	93	110
UNITAB	23	8	329	123	14	4	14	11
Total	1,113	687	982	665	704	490	421	389

Source: Report on Problem Gambling Exclusions in Queensland May 2005 – June 2007

In order to assist consumers and members of the community to make informed decisions about exclusions, OLGR developed the brochure *Information on Gambling Exclusions: Is the Game Playing You?* The brochure was supplied free-of-charge to all gambling providers in Queensland. The brochure is designed to explain to consumers the differences between self-exclusion and venue initiated exclusion, and their rights and responsibilities regarding exclusion. It includes contact information for the Gambling Help Line and Gambling Help services. The exclusions brochure was introduced to venues in late 2005 (venues are not legislatively required to have this brochure available).

The brochure on exclusions, along with other player information materials, was evaluated by market research undertaken by ACNielsen (2007) in their consultations with customers, venue managers, Gambling Help service providers, OLGR inspectors, and industry peak bodies. The review found that patrons' awareness of their ability to self-exclude was low, with some uncertainty as to the meaning of the term 'exclusion'. Recognition of the brochure was also low amongst all stakeholder groups, although slightly higher amongst Gambling Help service providers and industry peak bodies. Gambling venue managers thought that the brochure generally lacked appeal. Nonetheless, the content of the exclusions brochure was thought to be very informative and useful, not only for those with a gambling problem, but also for family and friends of these people and venue staff. OLGR inspectors and industry peak bodies thought it would be more appropriate for the brochure to be handed out on request about exclusions, rather than adding to signage clutter. However, because of the interest in the content of the brochure for gamblers and their families, strategic placement in gambling venues may be warranted. The Government is evaluating signs and brochures to improve message and information uptake.

Phase 3 stakeholder feedback (2007) raised exclusions as an area of risk to the sustainability of the *Code of Practice*. Suggestions from stakeholders included:

- improve venue processes around exclusions
- improve relationships between venues and their local Gambling Help services
- find a way to extend exclusions more widely across local areas or whole-of-state
- improve systems to enable better monitoring of those who are excluded.

The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* has noted that the number of exclusions reported most recently is less than the numbers reported in May 2005 after the implementation of the legislation. Awareness of the availability of exclusions, and how to undertake them, among the general adult Queensland population could be improved. The Government review of the exclusions framework will assist in identifying and addressing these issues.

3.4.2 Performance Indicator 2

Performance Indicator	Awareness of information on the odds of winning and rules of games
Target Groups	Industry
Performance Measures	Proportion of venues providing a player information guide

Proportion of venues providing a player information guide

Faulty cognition, or the holding of irrational beliefs about gambling and about the odds of winning, is a correlate of problem gambling. The *Queensland Household Gambling Survey 2006–07* included two questions on faulty cognition: ‘After losing many times in a row are you more likely to win’, and ‘You could win more if you use a certain system/strategy’. The percentage of persons agreeing that there was a greater chance of winning after losing many times in a row increased from 5% of recreational gamblers through to 20% of moderate risk gamblers and 33% of those in the problem gambling group. The percentage of persons agreeing that you could win if you used a certain system or strategy increased from 8% of recreational gamblers to 25% of moderate risk gamblers and 32% of problem gamblers.

Practice I, Provision of Information, in the *Code of Practice* requires that venues display a player information board. The information board contains advice that particular information (for example, Gambling Exclusions and Player Information Guide) is available on request. The Player Information Guide, prepared by gambling providers from the *Responsible Gambling Resource Manual*, contains mathematical descriptions of the odds of winning. The review conducted by ACNielsen, 2007, was focused mainly on the Information Display Board, but included feedback about other information sources, including the Player Information Guide, and how the odds of winning could be presented more meaningfully.

The review found that, while participants in the review may have noticed the Information Display Board that highlights the gambling help line number, they did not have a high awareness of other information that was available on request. Information on the odds of winning was perceived to be interesting and important information for all customers, not just those with a gambling-related problem. A suggestion arising from the review was to increase accessibility by placing information in non-gaming areas where people were having a break and more likely to talk about the information with others, rather than having to ask for it. The findings of the review will assist in improving the player Information Display Board that tells customers of the availability of a range of information.

3.4.3 Performance Indicator 3

Performance Indicator	Awareness of the availability of support services
Target Groups	Industry and Community
Performance Measures	<ul style="list-style-type: none"> • Level of community awareness of the Gambling Help Line phone number • Level of community awareness of gambling provider links with gambling-related support services

Level of community awareness of the Gambling Help Line number

Consumer and community awareness of gambling-related support services is critical to ensure consumers of gambling products can make informed decisions about their gambling practices. One important way to raise awareness of these services is to display responsible gambling signs and provide takeaway cards that include the Gambling Help Line number. The *Queensland Household Survey 2007* found that 61% of the estimated Queensland adult population had heard or read about the Gambling Help Line phone number – slightly less than the rate of 68% noted in the *Report on the Cultural Shift Review* (QOGR 2007, p. 29), and 69% in the *Report on the Implementation Review* (QOGR 2004, pp. 55, 56). People aged 65 years and over (46%) were

more likely than those aged 25 to 34 years (32%) to have heard of the Gambling Help Line phone number, and people who identified as Indigenous (79%) were more likely than those who did not identify as Indigenous (61%) to have heard or read about the Gambling Help Line phone number (*Queensland Household Survey 2007*).

To address a recommendation made in the *Report on the Cultural Shift Review* (QOGR 2007 p. 52) ORP is currently planning to develop communication materials specifically for Indigenous and CALD communities.

The *Queensland Household Survey 2007* found that, of those persons who have heard about or read the information about the Gambling Help Line, the most common places to have heard about or read information were:

- television (31%)
- club (25%)
- hotel (18%)
- venue restroom or toilets (12%)
- newspaper or magazine (11%).

People aged 18 to 24 years (32%) were more likely than people aged 45 to 54 years (13%), 55 to 64 years (12%), and 65 years or more (5%) to have heard or read about the Gambling Help Line in a hotel. People aged 65 years or more (21%) were more likely than people aged 18 to 24 years (7%), 25 to 34 (6%), 35 to 44 years (10%) and 45 to 54 years (7%) to have read about the Gambling Help Line in a newspaper/magazine. Females (16%) were more likely than males (9%) to have heard or read about the Gambling Help Line phone number in venue restrooms/toilets.

Level of industry familiarity with Gambling Help services

The *Code of Practice Phase 3 Survey, 2006*, found that approximately 91% of clubs and 94% of hotels were familiar with their local Gambling Help service, and racing and bingo were lower at 50% and 45% respectively.

Phase 3 stakeholder feedback sessions (2007) noted some reluctance among gambling providers to initiate contact with their Gambling Help services. Feedback from the RGAC Community Forum suggested that it was also possible for gambling providers to build connections with a range of counselling services available in the community who may have clients with gambling-related problems.

Community awareness of gambling provider links with Gambling Help services

According to the *Queensland Household Survey 2007*, 26% of the respondents had heard or read about face-to-face counselling services for gamblers. Of those people who said they had heard or read about face-to-face counselling services for help with problems associated with gambling, 29% reported they would go to the Gambling Help Line while 9% would go to Gamblers Anonymous.

Awareness that exclusion provisions are available at gaming venues is important for harm minimisation, and 52% of those surveyed in the *Queensland Household Survey 2007* were aware that people could ask to be excluded or banned from gambling at a venue, and this represented a 10% increase in awareness from the 42% reported in the *Report on the Cultural Shift Review* (QOGR 2007, p. 50). However, a much lower percentage, only 17% of respondents, were aware people could discuss gambling problems with someone at a gambling venue, a decrease from the 29% reported in the *Report on the Cultural Shift Review* (QOGR 2007, p. 53).

Government projects include regular evaluations of signage that investigates recall of messages and the impact of signs and brochures. The findings of these evaluations lead to the production of improved communication strategies and materials that assist raising customer awareness of responsible gambling, and promote the links with Gambling Help services.

3.4.4 Outcome 4: Summary

Consumers make informed decisions about their gambling practices

It is essential that consumers are able to make informed decisions about their gambling practices. The *Queensland Household Survey 2007* reported that 52% of the Queensland adult population were aware that people could be excluded from a gambling venue. Of these, around 66% were in the age group 55 to 64 years compared to 38% in the 18 to 24 years group. The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* showed that in the period between January 2006 and June 2007, there were around 1618 individuals who had excluded. An evaluation of specific information brochures about exclusions highlighted the uncertainty about the term 'exclusions'. Customers and the general public may understand the term 'banning' rather than 'exclusions'.

Agreement with faulty cognition correlate statements in the *Queensland Household Gambling Survey 2006-07* was more likely amongst persons in the at-risk gambling groups. The Player Information Guide containing information on the odds of winning is mentioned on the Information Display Board, and while it must be provided on request, it seems that it is not highlighted sufficiently for customers to know of its availability. The Player Information Display Board is being reviewed so that the content will be more effective in raising awareness of the availability and accessibility of information such as the odds of winning for gambling venue customers.

The *Queensland Household Survey 2007* found that 61% of the Queensland adult population had heard of the Gambling Help Line phone number. The Phase 3 Survey reported that some 91% of clubs and 94% of hotels had reported that they were familiar with their local Gambling Help service provider.

3.5 Outcome 5

Harm from gambling to individuals and the broader community is minimised

The guiding principle of the *Code of Practice* is ethical and responsible behaviour and recognition that potential harm from gambling is minimised to ensure the wellbeing of customers. Harm is measured by the prevalence of problem gambling. To minimise harm, customers should have access to Gambling Help services, and to information to assist them to self-exclude and be supported in their decision. Successful harm minimisation outcomes for individuals and the broader community are the responsibility of the gambling industry, customers and the community.

The performance indicators for Outcome 5 are:

1. prevalence of problem gambling
2. utilisation of exclusion provisions
3. responsible gambling-related breaches of regulation requirements
4. utilisation of gambling-related support services.

3.5.1 Performance Indicator 1

Performance Indicator	Prevalence of Problem Gambling
Target Groups	Consumers and Community
Performance Measures	Problem gambling, at-risk gambling

Problem gambling and at-risk gambling

The *Queensland Household Gambling Survey 2006-07* reported that approximately 0.47% of the adult population of Queenslanders (approximately 14000) were in the problem gambling group, which is similar to the proportion reported in the 2003-04 survey. A further 1.8% was classified as moderate risk, 5.7% were low risk, with 67% identified as recreational gamblers. In addition, 25% of the total adult population identified as non-gamblers. The problem gambling group was the smallest of the five gambling groups. However, among this group there was an overrepresentation (61%) of people in the 35 to 54 year age group. Some 6% of the moderate

risk gambling group were Indigenous, compared with the general population of whom 2% are Indigenous.

The table below provides prevalence rates from 2001 – 2006-07. Approximately 0.47% of the Queensland adult population (14000 people) are in the problem gambling group, which is similar to the proportion reported in the 2003-04 survey. There has been a statistically significant increase in the proportion of non-gamblers from 2003-04 to 2006-07, and a decline in recreational gamblers noted in the 2006-07 Survey.

Table 15. Comparing gambling group prevalence rates - 2001, 2003-04 and 2006-07

Gambling Group	Population estimates			Percentage estimates		
	2001	2003-04	2006-07	2001	2003-04	2006-07
Non-gambling	397 000	578 000	721 000	15.1%	19.7%	24.7%
Recreational gambling	1 934 000	2 119 000	1 965 000	73.2%	72.4%	67.3%
Low risk gambling	216 000	156 000	167 000	8.2%	5.3%	5.7%
Moderate risk gambling	71 000	58 000	54 000	2.7%	2.0%	1.8%
Problem gambling	22 000	16 000	14 000	0.83%	0.55%	0.47%

Source: Queensland Household Gambling Survey 2006-07 Fact Sheet 1 – Gambling group estimates

Lottery products (including instant scratch-its, lotto and other lottery products) were the most popular gambling activity for over 62% of the adult population, with 46% of players having participated 13 or more times during the 12 months prior to the *Queensland Household Gambling Survey 2006-07*. Electronic gaming machines were the second most popular activity with less than half the participation rates of lottery products, and over half of all users playing less than seven times in the previous 12 months.

The majority of adults (67%) who responded to the *Queensland Household Gambling Survey 2006-07* were recreational gamblers. Those in the 18 to 34 year old group were more likely than the older groups to be in the low risk gambling group. Problem gambling accounted for less than 1% of those in all three age groups (18 to 34, 35 to 54, 55 and over). Problem gambling among the 18 to 34 years group was 0.43%. Those in the 35 to 54 years age group were slightly more likely than those aged 55 years or more to be in the problem gambling group.

As the *Queensland Household Gambling Survey 2006-07* found, the higher risk groups tended to have higher participation rates for gaming machines, betting on horse or dog races and Keno than the recreational gambling group, and a greater tendency to participate in four or more gambling activities. Notably, while around 13% of recreational gamblers participated in four or more gambling activities, 38% of low risk, 44% of moderate risk and 56% of problem gamblers participated in four or more gambling activities.

Those identified as being in the problem gambling group were more likely than other gambling groups to play electronic gaming machines, to play them more frequently and for longer periods than was noted for other gambling groups. The proportion of those who gambled more than 53 times in the year, or more than once per week on average, was a small proportion of recreational gamblers – only 3%. In contrast, about 36% of problem gamblers were playing the pokies more than 53 times in the year.

The amount of time normally spent each time a gambler played poker machines or gaming machines differed for recreational and problem gamblers. About two thirds of recreational gamblers spent less than half an hour playing gaming machines. In contrast, only 10% of problem

gamblers typically spent less than half an hour playing gaming machines, and 30% usually played for three hours or more.

Demographics

Findings from the *Queensland Household Gambling Survey 2006-07* indicated that problem gamblers had similar demographic profiles to the Queensland adult population in most respects, but had some important differences. For instance, there was an over representation of people age 35 to 54 years, an under representation of people aged 55 years and over, and under-representation of people who were married or in a de facto relationship.

Comparisons *among* the gambling groups showed that there were no statistically significant patterns across gender composition and educational achievement levels. However, statistically significant differences appeared in age distributions with the majority, 61%, of problem gamblers in the 35 to 54 years group, while in other gambling groups 35 to 54 years were less than 44% of the group. Over 30% of non-gamblers and recreational gamblers were aged 55 years and over, with only 12% of problem gamblers in this age group. OLGR communication campaigns and responsible gambling signs were targeted towards particular demographic groups, with higher awareness of the messages among the under 55 years group, and more recognised by problem gamblers than other categories of gamblers.

People either married or in a de facto relationship accounted for the majority of persons in all of the gambling groups, however those who had never married made up a greater proportion of the low risk and moderate risk gambling groups than of the recreational gambling groups.

Similar proportions of each gambling group were engaged in part-time or casual work, while gamblers were more likely to be in the full time workforce or to be self-employed. Almost half of the non-gamblers were out of the paid workforce (full-time home duties, students, retirees and pensioners). The data showed 27% of non-gamblers reported incomes of less than \$11 000 per annum. By contrast, 15% of recreational gamblers and 13% of moderate risk gamblers were in this income bracket.

Co-morbidities

The *Queensland Household Gambling Survey 2006-07* found similar results to those of previous surveys for relationships existing between gambling groups and reported family histories of alcohol, drug and gambling problems. For example:

- 58% of those in the problem gambling group reported having an immediate family member with an alcohol or drug problem
- 51% had an immediate family member who had experienced a gambling problem (17% for low risk gamblers)
- 64% of problem gamblers were smokers – the highest proportion of any gambling group (moderate risk gamblers 44%, low risk gamblers 36%, recreational gamblers 22% and non-gamblers 14%)
- 58% of problem gamblers experienced an urge to gamble in response to painful events in their lives (23% for moderate gamblers)
- Those in the problem gambling group reported increased rates of stress, depression and suicidal thoughts with 39% reportedly under a doctor's care for stress; 72% of problem gamblers felt seriously depressed in the previous year, and 19% seriously considered suicide because of their gambling.

These findings highlight the complexity of issues associated with individuals experiencing problems associated with gambling, and provide information that can be used in future awareness-raising campaigns.

3.5.2 Performance Indicator 2

Performance Indicator	Utilisation of exclusion provisions
Target Groups	Consumers and Community
Performance Measures	Consumer use of exclusion provisions Industry provision of exclusions

Consumer use of exclusion provisions

In May 2005, an exclusions regime began in Queensland for casinos, clubs, hotels and totalisator betting, supported by an extensive education and training process, particularly for Queensland's 1350 clubs and hotels, and also including industry peak bodies, casinos, UNiTAB, Gambling Help services and OLGR.

Amendments to legislation required gambling operators to:

- exclude those requesting exclusions (self-exclusion)
- use discretion in excluding customers they believe to be problem gamblers (venue-directed exclusions)
- facilitate referral of self-excluding customers to Gambling Help services and
- impose a consistent time period across gambling legislation on exclusions.

To support the education and training done by club and hotel sectors prior to the introduction of the legislation, a Responsible Gambling Training DVD, focusing mainly on the provision of exclusions, was produced. Practice 3 – Exclusions, in the *Queensland Responsible Gambling Resource Manual* was updated and given to all Queensland gambling providers to ensure that practical guidance on the required process was available at all venues.

The *Queensland Household Gambling Survey 2006-07* reports that overall, 11% of the Queensland adult 'at risk' population had tried to exclude themselves from a venue. People in the problem gambling group (41%) were more likely to have tried to exclude themselves from a venue than those in the low (7%) and moderate (16%) risk groups, highlighting that help is more likely to be sought when gambling problems are at their worst. Regional differences were not significant. Data collected from gambling providers¹⁴ since the implementation of the new exclusions regime has estimated that there were 3512 self-exclusion orders, 45 venue exclusions estimated to be 1618 individuals.

Industry provision of exclusions

The *2006 Gaming Machine Venue Survey* found that equivalent numbers of clubs and hotels had either positive or negative experiences under the new exclusions regime (similar to the 2005 survey). Venues with a positive experience of the new exclusions regime commented on the increased awareness of their staff that resulted from training in exclusions.

The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* found that around two thirds of casino problem gambling-related exclusions were for males, with those between 25 and 44 years accounting for more than a half of the exclusions. Exclusions for UNiTAB were highest for the age groupings between 25 and 54 years, which accounted for more than 90% of all UNiTAB exclusions. While casino and UNiTAB sectors have remained reasonably consistent in numbers of exclusions reported, clubs and hotels have had a decrease from 537 in the May – December 2005 period, to 268 in the January – June 2007 period. Without further investigation, it is difficult to explain why such a large decrease occurred during this time.

The North West statistical division had the highest ratio of exclusions at 22 per 10000 adult population compared with the lowest in the South West of 1 for 10000 adult population, and Brisbane with 5 for 10000. Statistically interesting are the results for Darling Downs (12), Wide Bay-Burnett (13) and Fitzroy (10) which have exclusion figures (per 10000 adult population) that are higher than their percentage of electronic gaming machines. The high proportions of exclusions may indicate that there are effective relationships between gambling providers and Gambling Help services in those regions.

¹⁴ *The Report on Problem Gambling Exclusions in Queensland May 2005 to June 2007*

Table 16. Percentage of overall Queensland figures and electronic gaming machines (EGMs) per 10 000 adult population by Statistical Divisions

	% Pop'n	% EGMs	No of exclusions	% exclusions	EGMs/ 10,000 adult pop'n	Exclusions/ 10,000 adult pop'n
Brisbane	44.9	39.3	899	35.2	93	5
Moreton	21.4	22.7	423	16.5	112	5
Darling Downs	5.5	5.6	279	10.9	107	12
Wide Bay-Burnett	6.5	7.5	344	13.4	122	13
Fitzroy	4.7	5.9	201	7.8	133	10
Mackay	3.7	5.1	63	2.4	144	4
Northern	5.2	4.6	135	5.2	95	6
Far North	6.0	6.1	127	4.9	109	5
North West	0.8	1.6	76	2.9	204	22
South West	1.7	0.7	4	0.1	123	1

Source: Report on Problem Gambling Exclusions in Queensland May 2005-June 2007

Issues raised by industry in the Phase 3 stakeholder feedback sessions, 2007, were how to organise exclusions to extend further than the original site of exclusion and encompass gambling providers in the same area. A consortium approach, bringing together gambling providers in specific locations to organise exclusion coverage was suggested by OLGR inspectors. In small towns ensuring anonymity for excluded customers was important, but difficult. The role of the CLO was critically important, not only to have the right person in individual venues, but for training across venues to be consistent.

Some of the suggestions put forward were:

- a smaller discrete version of venue exclusions for customers
- mandatory training to provide awareness of Responsible Gambling to all staff
- a smart card system for identification of exclusions
- a remote multi-venue process networked through state
- a CLO on site for all operating hours (acknowledged as difficult for small venues).

The need for more training in exclusions, staff lacking confidence with undertaking exclusions which were infrequently requested in some areas, a high turn-over of staff and managers, clients who found the exclusion process daunting, and difficulties for CALD customers with filling in forms were some of the issues about exclusions raised by Gambling Help services. OLGR inspectors noted that some venues were not proactive in initiating exclusions, the required forms were often not completed correctly, and casinos had to manage large data bases and subsequent identification of those registered as excluded.

In view of concerns that continue to be raised around exclusions, Government will undertake a thorough review of the exclusions regime. The review will also consider the concept of third

party exclusions. Providing guidance about how to handle approaches from interested third parties in the Exclusions section of the *Code of Practice* would alleviate confusion expressed by some gambling providers about their responsibilities in this area. While gambling providers may be highly committed to providing training in responsible gambling for their staff, they also need to ensure that their staff fully understand the processes involved in undertaking exclusions, and their duty of care related to claims by third parties.

3.5.3 Performance Indicator 3

Performance Indicator	Responsible gambling-related breaches of regulation
Target Groups	Industry, Government
Performance Measures	Contraventions of exclusions

Contraventions of exclusions

The *Report on Problem Gambling Exclusions in Queensland May 2005 to June 2007* found that there had been few contraventions of exclusions for problem gambling since the legislative provisions were initiated in May 2005. OLGR was notified of 54 breaches of exclusions for responsible gambling issues in the clubs and hotels sector for the period May 2005-June 2007. There were 297 contraventions related to responsible gambling across all four casinos for the period May 2005-June 2007 casino contraventions included breaches under Section 92 for individuals who had a problem gambling exclusion in place prior to the introduction of the *Gambling Legislation Amendment Act 2005*).

Twenty-eight warnings had been issued by OLGR for the hotel and club sector for problem gambling exclusion contraventions, with three Penalty Infringement Notices issued for second offences. For casinos, 189 warnings were issued, there were 15 Penalty Infringement Notices, and 87 notices to either appear or for prosecution. The legislation related to exclusions also allows self-excluded individuals to request revocation of their exclusions after one year. Exclusion returns received confirm that there have been 18 (14 hotels, 4 clubs) revocations for hotels and clubs and 26 revocations for casinos that occurred to June 2007.

3.5.4 Performance Indicator 4

Performance Indicator	Utilisation of gambling-related support services
Target Groups	Consumers, Community
Performance Measures	Proportion of Gambling Help Line and Gambling Help service referrals received from gambling providers

Proportion of Gambling Help Line and Gambling Help service referrals received from gambling providers

Activity data for the Gambling Help Service System is reported six-monthly, and provides information identifying referral sources and patterns for the Gambling Help Line and the Gambling Help services.

The Gambling Help Line received fewer referrals from casino staff and gambling venue staff than from other sources, with the phone book and family and friends being the source of most referrals.

Table 17. Caller referral source for the Gambling Help Line

	Phone Book	Family Friends	Poster or venue notice	Brochure card	Casino staff	Gaming venue staff
Jan – June 2006	24.1%	20.3%	11.0%	10.0%	5.2%	2.6%
July – Dec 2006	24.8%	25.0%	12.4%	8.7%	3.8%	2.2%
Jan – June 2007	24.1%	14.9%	13.3%	8.8%	4.1%	3.3%
July – Dec 2007	14.6%	20.6%	15.1%	11.5%	3.6%	2.4%

Source: Gambling Help Service System Six Monthly Reports Jan 2006-Dec 2007

Callers were referred through a diverse range of pathways. Data for the period July to December 2007 showed some increases on the previous six month period January to June 2007 in some referral sources, for example:

- another gambler (up 9% to 13%)
- family or friend (up 9% to 21%)
- poster or venue notice (up 4% to 15%)
- directory assistance (up 3% to 9%).

There was a sizable decrease in the July to December 2007 period, from the previous six monthly period, of referrals from the phone book, and higher rates of referral from another gambler and family or friends, which may indicate increasing awareness of the availability of help for those experiencing gambling-related problems, although referrals from both the phone book and family and friends, considered over time, remain the highest sources of caller referrals. Caller referral sources from gaming venue staff have remained relatively constant.

Table 18. Caller referral source for the Gambling Help Line by period*

	July to December 2007	July 2002-June 2007
Family or Friends	20.6%	12.0%
Poster or Venue Notice	15.1%	11.6%
Phone Book	14.6%	23.6%
Another Gambler	13.4%	4.4%
Brochure or Card	11.5%	13.0%
Directory Assistance	8.8%	6.0%
Casino Staff	3.6%	1.7%
Other	3.1%	1.6%
Other Professional	2.8%	1.9%
Gaming Venue Staff	2.4%	2.2%
Gambler's Help Service Providers	1.3%	1.7%
Support Services	1.3%	1.7%
Billboard	1.3%	0.2%
Television	0.7%	1.3%
Paper or Journal	0.4%	0.3%
Radio	0.0%	0.2%

* Rounding means that totals do not necessarily add to 100%

Source: Gambling Help Line and Gambling Help services Six Monthly Report 1 July – 31 December 2007

Services provided by the Gambling Help Line in the period July to December 2007 were consistent with the period July 2002 to June 2007. The Gambling Help Line referred around 36% of callers to another agency (some callers may have co morbidities, and the kind of assistance they require may be better provided by another agency). Approximately 38% of callers received counselling and support and around 25% received information and education.

Gambling Help services received fewer referrals from gambling venues than from the Gambling Help Line or from family, friend or neighbour, but more referrals from gaming venues than from the phone book, advertising or another gambling service.

Table 19. Client referral source for the Gambling Help Service

	Gambling Help Line	Family, friend or neighbour	Gaming Venue	Phone Book	Advertising	Another Gambling Help service
Jan – June 2006	33.1%	15.0%	11.1%	8.9%	5.7%	3.3%
July – Dec 2006	33.1%	15.0%	11.1%	8.9%	5.7%	3.3%
Jan – June 2007	37.4%	11.4%	13.5%	11.4%	5.1%	1.9%
July – Dec 2007	35.6%	12.8%	11.9%	9.8%	7.4%	3.0%

Source: Gambling Help Service System Six Monthly Reports Jan 2006-Dec 2007

When comparing the client referral sources for the Gambling Help services for the period July to December 2007 with the period between July 2002 and June 2007, there was a small increase in the referrals from the Gambling Help Line, but relatively consistent percentages of referral sources, with referrals from a gaming venue remaining at around 12% of the client referral sources.

Table 20. Client referral source for the Gambling Help services by period

	July – December 2007	July 2002 – June 2007
Gambling Help Line	35.6%	30.0%
Family/Friend/Neighbour	12.8%	13.5%
Gaming Venue	11.9%	12.4%
Phone Book/Directory Assistance	9.8%	10.8%
Advertising	7.4%	6.5%
Another Counsellor	6.0%	7.7%
Community Agency/Service	4.9%	5.1%
TAB	2.6%	2.6%
Another Gambling Help Service	3.0%	4.7%
Health Service	2.6%	2.0%
Legal person/Agency/Court	1.4%	2.0%
Self-Help Group	1.2%	1.6%
Another Gambling Help Service Client	0.5%	0.7%
Golden Casket	0.5%	0.3%
School	0.0%	0.1%

Source: Gambling Help Line and Gambling Help services Six Monthly Report 1 July – 31 December 2007

Addictions counselling remained the overwhelming intervention service provided to around 84% of clients of the Gambling Help services, with 8% of clients receiving financial counselling, and 8% of clients receiving relationship/family counselling in the July to December 2007 period, maintaining consistent percentages of the service interventions provided when compared with the July 2002 to June 2007 period. A proportion of people who sought help from Gambling Help services had other correlates such as child abuse, substance dependence and/or a suspected psychological disorder related to their gambling behaviour and issues. Gambling Help services therefore make referrals to other help services, with referrals to a mental health agency increasing to 11% of referrals in the six months to December 2007 from 7% for the period July 2002 to June 2007.

Consistent findings of the *Queensland Household Gambling Surveys* (2001, 2003-04, and 2006-07) are that the majority of those identified as being in the problem gambling group do not seek help for gambling-related problems. The *Queensland Household Gambling Survey 2006-07* highlighted that the problem gambling group reported the highest level of wanting or seeking help for gambling-related problems with 48% reporting they wanted help in the last 12 months. However, only 28% had actually sought help of any kind.

The *Report on Problem Gambling Exclusions in Queensland May 2005-June 2007* compared the number of individuals who had been excluded from venues with those who sought help from the Gambling Help service providers for problem gambling.

Table 21. Age and gender demographics for individual exclusions and those who sought help from Gambling Help services May 2005-June 2007

	Exclusions				Gambling Help services (GHS)			
Age group	Male	Female	Total	% of Total	Male	Female	Total	% of Total
No date of birth	38	45	83	5.1%	14	20	34	1.3%
18-34	340	162	502	31.0%	610	278	888	34.2%
35-54	425	356	781	48.3%	641	617	1258	48.5%
55+	98	154	252	15.6%	149	265	414	16.0%
All ages	901	717	1618		1414	1180	2594	
% of Total	55.7%	44.3%		100%	54.5%	45.5%		100%

* Note – the figures provided for those who have sought assistance from GHS have not be confirmed by OLGR and are as reported by the GH service providers.

Source: Report on Problem Gambling Exclusions in Queensland May 2005-June 2007

While the number of individuals who had excluded differed from the number of individuals reported to have sought help from the Gambling Help services, there were similar percentages in age groupings, in particular for the age groups 35 to 54 years (accounting for 48% of exclusions and 49% of those seeking help from Gambling Help services) and 55 years and over (16% of all exclusions and 16% of those seeking help from Gambling Help services). Of the total number of individual exclusions, 56% were male, which compared, proportionally, to 55% of Gambling Help service clients who were male. Similarly, 44% of all exclusions were women, and 46% of the total numbers of persons who sought help from the Gambling Help service providers were women.

3.5.5 Outcome 5: Summary

Harm from gambling to individuals and the broader community is minimised

The review period of five years was established in order to monitor and evaluate the levels of acceptance, embedding and ongoing sustainability of the *Code of Practice* as industry-led best practice. Key indicators used to monitor the progress of the acceptance of the *Code of Practice* are prevalence data about problem gambling, the use of exclusion provisions, breaches of regulation requirements and the use of gambling-related support services.

The prevalence rate for problem gambling in Queensland reported in the *Queensland Household Gambling Survey 2006-07* was 0.47%, with 1.8% in the moderate risk group and 5.7% in the low risk group. Some 67% were in the recreational gambling group. There was an over-representation (61%) of those in the 35 to 54 years age group in the problem gambling group. Between 2003-04 and 2006-07 there was a significant increase in the proportion of the non-gambling group, and a decline in the proportion of recreational gambling group. Notably, more than half of the problem gambler group were also likely to be smokers, experience the urge to gamble in response to painful life events, and to have experienced feeling seriously depressed in the past twelve months.

Around 11% of those at risk of gambling-related problems (more likely to be problem gamblers than low to moderate risk gamblers) had attempted to exclude themselves from venues. According to the *Report on Problem Gambling Exclusions (May 2005-June 2007)* there were an estimated 1618 individuals excluded as at June 2007. Casinos and UNiTAB had consistent numbers of exclusions while Clubs and hotels had decreases from 537 reported in May to December, to 268 reported in January to June 2007, with few contraventions of exclusions since the introduction of legislation

in May 2005.

The *Gambling Help Service System Six-Monthly Reports* (Jan 2006 to June 2007) show that in the six months to December 2007, the Gambling Help Line received more referrals from another gambler, or family or friends than other sources, such as casino staff or gaming venue staff. There were fewer referrals from gambling venues to the Gambling Help services than there were from family/friends/neighbours, with the highest proportion of referrals, 36%, provided by the Gambling Help Line.

3.6 Outcome 6: People adversely affected by gambling have access to timely and appropriate assistance and information.

Outcome 6 is concerned with the effectiveness of the Gambling Help Service System to assist those people adversely affected by gambling by providing appropriate assistance and information. The sustainability of the *Code of Practice* can be demonstrated by effective and well-established links between gambling providers and their local gambling-related support services, the use of those support services by consumers of gambling products and services, and the use of exclusion provisions.

Achievement against Outcome 6 of the *Code of Practice* was measured through three performance indicators:

1. effectiveness of links with gambling-related support services
2. utilisation of gambling-related support services
3. utilisation of exclusion provisions.

3.6.1 Performance Indicator 1

Performance Indicator	Effectiveness of links with gambling-related support services
Target Groups	Community, Industry and Government
Performance Measures	<ul style="list-style-type: none"> • Proportion of gambling providers who are maintaining links with gambling-related support services • Proportion of Gambling Help Line and Gambling Help service referrals received from gambling providers

Proportion of gambling providers who are maintaining links with the gambling-related support services

The effective establishment of links between industry venues and their local Gambling Help service is critically important for the continuation and sustainability of responsible gambling as supported by the *Code of Practice*. The *Code of Practice* recommends that gambling providers offer customers who seek exclusion contact information for gambling-related support services. This is mandatory for clubs, hotels, and totalisator betting agencies under the *Gambling Legislation Amendment Act 2005*, and for casinos under the *Casino Control Act 1982*.

Findings about the establishment of effective relationships between gambling providers and Gambling Help service provides has been reported previously under Outcome 1 and Outcome 3. Brochures were developed by Government to assist both gambling providers and Gambling Help services understand how to establish effective links for the exchange of information aimed at supporting those experiencing gambling-related problems. Government projects and strategies will result in improvements to the Gambling Help services.

Proportion of Gambling Help Line and Gambling Help service referrals received from gambling providers

Findings for this performance measure have been reported above in Outcome 5: Performance Indicator 4.

3.6.2 Performance Indicator 2

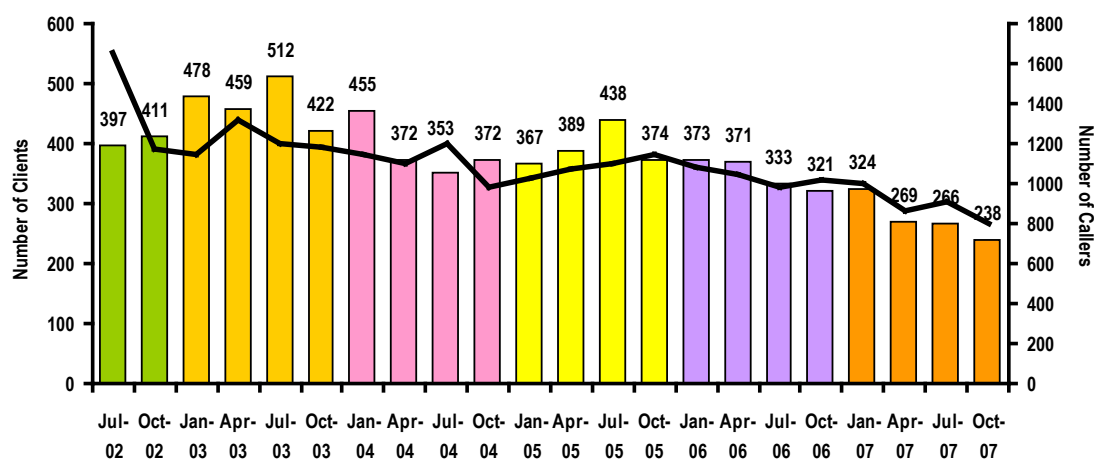
Performance Indicator	Utilisation of gambling-related support services
Target Groups	Consumers, Community, Industry and Government
Performance Measures	<ul style="list-style-type: none"> • Number of clients of the Gambling Help services • Number of calls to the Gambling Help Line

Number of clients of the Gambling Help services

The Gambling Help Service System is comprised of the Gambling Help Line, the Gambling Help Services, the Gambling Help Network and the inpatient service offered by the Moonyah Alcohol and Drug Rehabilitation Centre. The sources of information about the number of clients attending Gambling Help services, and the number of calls to the Gambling Help Line are provided in the *Gambling Help Service System Five-Year Report July 2002 to June 2007*, and the six-monthly reports from the Gambling Help Service System.

The six-monthly report from Gambling Help Line and Gambling Help Services (1 July to 31 December 2007) reported that Gambling Help services counselled 504 people during this time, adding to the 7790 people counselled between July 2002 to June 2007. Figure 2 shows the number of people seen each quarter since July 2002. The Gambling Help services saw an average of 252 clients per quarter for the six months to December 2007 compared to an average of 389 people per quarter for the five years up to June 2007. The data shows a gradual decline in the number of clients attending Gambling Help services after a peak in July 2003, and this may indicate a plateau in the number of clients attending the services has occurred.

Figure 2. Number of clients attending Gambling Help services, July 2002-December 2007



Source: Gambling Help services Six-Monthly Report 1 January – 30 June 2007

In the July to December 2007 period approximately 52% of Gambling Help service clients were men and 48% were women. This is the reverse of average proportions for the five years prior to June 2007 (48% men, 52% women). The percentage of clients aged 55 years or over (18%) who accessed the Gambling Help services in the six months between July and December 2007 was higher than the percentage average of 16% for the five years prior to June 2007. There was a significant increase in the proportion of female clients aged 55 years or over (26%) who accessed the Gambling Help services in the six months between July and December 2007 compared to the 19% averaged for the previous five years between July 2002 and June 2007.

While there were increases in the percentages of clients aged over 55 years, there was a slight decline in the age groups 18 to 34 years (31%) and 35 to 54 (50%) who accessed the Gambling

Help services in the six months to December 2007 compared to the average over the five years prior to June 2007 (33% and 50% respectively). There was a 4% increase in clients who were employed (67%) attending the Gambling Help services in the six months to December 2007. Clients were primarily Australian-born (73%).

The *Queensland Household Gambling Survey 2006-07* asked the 'at risk' gambling groups about their preferences for receiving help. Around two thirds (68%) reported they would prefer face-to-face counselling, while 35% preferred telephone help. An estimated 5% of the Queensland adult 'at risk' population wanted help for gambling-related problems in the last twelve months, with the highest proportion (48%) from the problem gambling group. A small percentage of the 'at risk' group (3%) reported that they had tried to get personal or professional help for gambling-related problems.

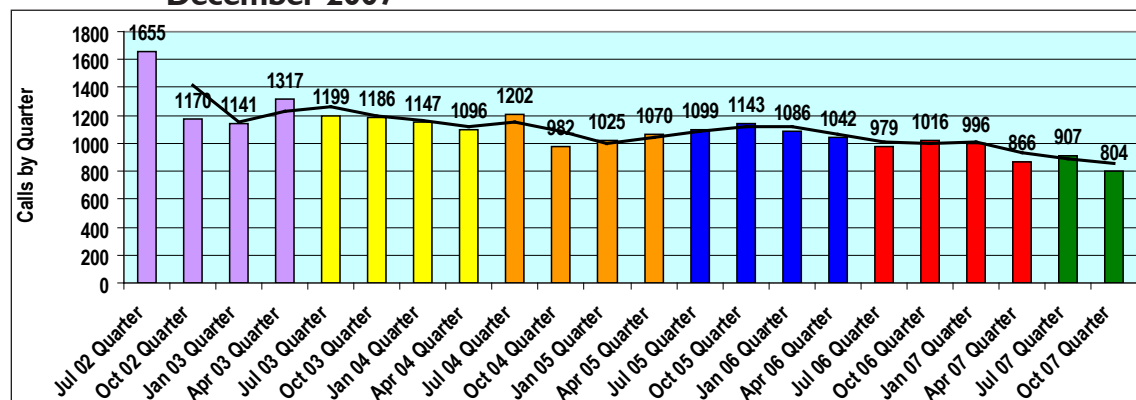
The *Queensland Household Gambling Survey 2006-07* found that although 48% of the problem gambling group reported wanting to get help in the last 12 months, only 28% had actually sought any form of help. Financial problems and feeling depressed or worried were the most common reasons given for seeking help. Of the 72% of the problem gambling group who did not seek help, 34% said 'I thought I could beat the problem on my own', and 37% said 'I don't consider I have a problem'.

Resources such as Government self-help brochures and the future development of a national online counselling support initiative will add to the existing options available for those who are experiencing gambling-related problems. These alternatives may suit those people who, for some reason, do not contact their Gambling Help service when excluded from a venue.

Number of calls to the Gambling Help Line

The *Report on the Implementation Review* (QOGR 2004, p. 60) reported that calls to the Gambling Help Line rose significantly with the introduction of the Gambling Help Line toll-free number on responsible gambling signs in venues. From January to June 2003 the number of calls had reached a plateau of approximately 400 calls a month (except for a slight peak in May 2003). The *Gambling Help Service System Six-Monthly Report July to December 2007* depicts in the figure below, that from July 2002 to December 2007 the Gambling Help Line received 24128 calls, with 1711 of those calls received in the six months to December 2007.

Figure 3. Number of calls received by the Gambling Help Line July 2002 - December 2007



Source: Gambling Help Line and Gambling Help Services: Six Monthly Report | July – 31 December 2007

The Gambling Help Line received an average of 856 calls per quarter in the period July to December 2007, compared to an average of 1096 per quarter for the five years to June 2007, indicating a gradual plateau effect over time. There was a slightly higher increase in calls from men in the six month period to December 2007, compared with the average for the prior five years. Although showing a slight decrease, the age group most likely to ring the Gambling Help Line in the six months between July and December 2007 was 31 to 35 years (16% of callers), and 90% of callers were Australian born.

Of the callers to the Gambling Help Line for the period July to December 2007, 36% were referred on to other agencies. Around 38% of callers received counselling and support in the

July to December 2007 period, slightly down from the 40% over the prior five year period, July 2002–June 2007. In addition, 25% of callers received information and education.

Finding 10

It is important for the provision of appropriate help services that accurate, reliable data is captured.

Recommendation 10

Government is to ensure that the Gambling Help Service System maintains robust records through the improvements introduced and provides uniform system delivery and efficient, accurate and timely reporting.

3.6.3 Performance Indicator 3

Performance Indicator	Utilisation of exclusion provisions
Target Groups	Consumers, Community and Industry
Performance Measures	Number of people excluded from gambling venues in Queensland

Number of people excluded from gambling venues in Queensland

Exclusions are an area of the *Code of Practice* subject to legislation. Under the *Gambling Legislation Amendment Act 2005*, gambling providers are to actively enforce exclusion provisions. While exclusions are, in the main, customer-initiated, the Act also gives gambling providers the authority, but not the duty, to initiate exclusions. The voluntary *Code of Practice* requires gambling providers to have adequately trained staff and effective procedures in place to assist those who seek exclusions.

Data supplied by clubs and hotels for the time between May 2005 and June 2007 indicated (below) that almost all problem gambling-related exclusions were self-exclusions. This was not unexpected as the preferred approach requires encouraging customers who may be experiencing problems with gambling to self-exclude, or to contact an appropriate help service where self-exclusion is encouraged and supported.

Table 22. Summary of exclusions related to problem gambling for May 2005–June 2007

Gambling operators	Self-exclusion orders	Venue exclusion Directions of problem gamblers	Estimated number of individuals*
Clubs and Hotels	2517	34	1122
Casinos	450	7	456
UNiTAB Agencies, Telebet	545	4	40
Total	3512	45	1618

* Estimates of individuals based on initials, gender and date of birth as unique identifiers as provided by gambling providers

Source: Report on Problem Gambling Exclusions in Queensland May 2005 to June 2007

Casino exclusions

Overall, there had been only a minimal increase in the number of casino exclusions since the introduction of legislation in May 2005. The majority of exclusions between May 2005 and June 2007 had been in the age groups 25 to 34 years (29%) and 35 to 44 years (25%) which comprised more than half of the problem gambling exclusions. The next largest age groupings were under 25 years (13%) and 45 to 54 years (21%). Around two thirds of casino exclusions were for males.

The 35 to 54 years age group comprised more than half of the excluded females, and the 25 to 34 years age group around one quarter.

Of the 40 individuals excluded for problem gambling reported by UNiTAB (for agencies and Telebet) during May 2005 to June 2007, 37 were male. Exclusions for those in the age groupings 25 to 34 years, 35 to 44 years and 45 to 54 years accounted for more than 90% of all UNiTAB exclusions.

3.6.4 Outcome 6: Summary

People adversely affected by gambling have access to timely and appropriate assistance and information.

An essential element to ensuring that gambling environments are safe and supportive is providing help to those who are experiencing gambling-related problems. Establishing effective relationships with Gambling Help service providers continues to be an area where gambling providers need to improve. While the majority of gambling providers can identify those offering gambling-related support services, they are less able to name their specific local Gambling Help service.

In the six months to December 2007, the Gambling Help services counselled 504 clients (in addition to 7790 counselled between July 2002 and June 2007). Approximately 52% of Gambling Help service clients were male, and 48% were female. During the six months to December 2007, there was an increase in the proportion of clients aged over 55 years (18%), and slight declines in the proportion of clients in the age groups 18 to 34 years (31%) and those aged between 35 to 54 years (50%). The age grouping 35 to 54 years accounted for the largest percentage of those seeking help from the Gambling Help services. The *Report on Problem Gambling Exclusions May 2005-June 2007* reported that there were an estimated 1618 individuals who were gambling-related exclusions.

The *Gambling Help Service System Six-Monthly Reports* noted that the number of calls to the Gambling Help Line between July 2002 and December 2007 was 24128. In the six months to December 2007, the age group most likely to call was the 31 to 35 years group. Around 36% of callers were referred to another agency. Some 38% of callers received counselling and support, and 25% of callers received information and education.

Although around 48% of the problem gambling group wanted to get help in the last 12 months, only 28% had actually done so. Of the 72% of the problem gambling group who did not seek help, 34% said 'I thought I could beat the problem on my own', and 37% said 'I don't consider I have a problem' (*Queensland Household Gambling Survey 2006-07*). Government is reviewing strategies that will significantly improve the quality of data collected by the Gambling Help Service System, and provide uniform system delivery and efficiencies.

4. Sustainability of the Queensland Responsible Gambling Code of Practice

4.1 Introduction

The *Code of Practice* was developed in response to Priority Action Area 5 of the Queensland Responsible Gambling Strategy. As a mainly voluntary *Code of Practice*, it aims to promote responsible gambling by encouraging the creation and maintenance of gambling environments that minimise harm to customers of gambling venues and the wider community. By adhering to the *Code of Practice* the gambling industry demonstrates its commitment to responsible gambling practices, particularly in the context of consumer protection measures that ensure they provide safe and supportive gambling environments for the delivery of gambling products and services.

The major task of the Sustainability Review was to evaluate whether the *Code of Practice*, after five years of operation, was positioned to achieve long-term responsible gambling practices that efficiently and effectively minimise the harm associated with gambling and to inform the Minister, members of the RGAC and other relevant stakeholders.

Sustainability refers to industry led promotion and maintenance of long-term, resource effective and efficient responsible gambling practices. Such practices encourage economically and socially viable gambling by recognising the State and community benefits from gambling, and addressing the potential harm associated with gambling. Importantly, it is gambling providers' commitment to the *Code of Practice* that is the ultimate measure of sustainability, demonstrated by the *Code of Practice* being embedded as 'best practice' in the gambling industry. Other key stakeholders – individuals, the community and Government – bear equal responsibility for supporting the *Code of Practice* to ensure that all aspects are addressed.

4.2 Sustainability Review of the Code of Practice

The *Code of Practice*, when introduced, foreshadowed a significant cultural change to the gambling industry in Queensland with a focus on responsible gambling and an emphasis on harm minimisation for those to whom gambling may present problems. The *Report on the Sustainability Review* completes the three phase review tracking the implementation, acceptance and ongoing commitment to the *Code of Practice* over five years.

Overall, the level of commitment to the *Code of Practice* achieved in the five-year review phase has demonstrated the willingness of industry, community and Government to work together to achieve a remarkable change in the gambling environment in Queensland. Commitment to the *Code of Practice* has been encouraged by the co-regulatory approach that involves multi-stakeholders in both public regulation by law, and self regulation by industry. Throughout the review process, industry sectors have reiterated their support for the *Code of Practice* remaining voluntary.

Through all review phases, there have been several issues that have been highlighted as risks to the sustainability of the *Code of Practice*. They include:

- inconsistencies across all industry sectors in commitment to quality and frequency of training
- inconsistent understanding of how to undertake exclusions and of the importance of the CLO role
- lack of established relationships being demonstrated between all gambling providers and their local Gambling Help services
- the interpretation and use of the *Advertising and Promotions Guideline*.

Other risks that have emerged from the final review are those associated with measuring industry commitment in the future, maintaining customer awareness of information about the gambling environment, and ensuring effective and efficient system delivery and record keeping for Gambling Help services.

Legislative changes have made some practices in the *Code of Practice* mandatory during the five-year review period, and recommendations from each review have resulted in provision of various resources to improve stakeholder understanding and knowledge in specific areas. As stated in the *Code of Practice*, the Government retains the right to legislate in any area of gambling at any time. As the Government continues to review responsible gambling practices within the industry it is possible that other practices may be included in legislation including those mentioned above as risks to the sustainability of the *Code of Practice*. For example, the Government's latest harm minimisation initiatives include the introduction of legislation for mandatory training on the Responsible Service of Gambling for club and hotel employees with direct responsibility for gambling.

The tripartite approach that informs and sustains commitment to the *Code of Practice* has been an essential component assisting the transformation of the gambling industry over the five year period of the review. It is essential that this relationship continues in order to respond to issues that arise in the future, in accord with the aims of the *Queensland Responsible Gambling Strategy*.

At an operational level the *Code of Practice*, as a dynamic and living document, should continue to evolve and reflect a best practice approach to the maintenance of responsible gambling environments.

Finding 11

Changes that have occurred during the five-year review period, such as legislative amendments to exclusions provisions and proposed changes to the provision of responsible gambling training need to be reflected in the *Code of Practice* document.

Recommendation 11

As this issue is being examined in a significantly wider strategic context, it is recommended that, in addressing this issue, the Government has regard for the recommendations of the evaluation of the *Queensland Responsible Gambling Strategy* in this area.

4.3 Conclusion

Phase 1 evaluated the effectiveness of the implementation of the *Code of Practice*, and found that the commitment rate slightly exceeded the pre-set benchmark that indicated success. The challenge for gambling providers was to sustain and improve on this commitment level to be reported in subsequent reviews – Phases 2 and 3.

A number of amendments to the *Code of Practice* and the *Resource Manual* were made after being identified during the Implementation Phase, particularly the clarification of language and concepts to improve understanding of the practices. None of the practices were recommended for minimum standards. However, an exclusions model was developed and subsequently led to legislation of some exclusion practices.

Phase 2 measured the level of industry commitment to adopting the *Code of Practice* as indicative of a move in gambling providers' organisational culture towards embracing and embedding responsible gambling principles as part of their core business practice. The level of commitment of all industry sectors improved during Phase 2. However, while general implementation of the *Code of Practice* and of specific practices by gambling providers indicated that the aims of the Cultural Shift were generally being reached, there were still instances where commitment was less than desired.

The *Gambling Legislation Amendment Act 2005* made the provision of exclusion procedures and supporting documentation by gambling providers mandatory to ensure consistency across industry sectors. Recommendations were made and acted upon to promote awareness of responsible gambling to the Queensland community, to reinforce the importance of training, increase the commitment levels of all sectors of the gambling industry, and to develop strategies to assist with establishing relationships between gambling providers and their local Gambling Help services.

The review process undertaken over five years, beginning with the Implementation Review, encompassing the Cultural Shift Review and culminating in the Sustainability Review has found

increasing high levels of commitment to the *Code of Practice* by gambling providers. The achievements demonstrated by industry, community and Government indicate that the *Code of Practice* has been accepted and has the capacity to maintain long-term responsible gambling practices that minimise the harm from gambling.

Although many of the recommendations of the *Report on the Cultural Shift Review* have been undertaken, more recommendations have been made to address areas where commitment has been inconsistent across all industry sectors. In addressing challenges to the sustainability of the *Code of Practice*, the role of the RGAC will be of utmost importance. The RGAC will need to continue to support the ability of the *Code of Practice* to be responsive to emerging issues and the ongoing measurement and documenting of commitment to the *Code of Practice*.

5. Appendix I: Glossary

Best practice: occurs when a gambling provider not only implements the practices of the Queensland Responsible Gambling *Code of Practice* but goes beyond the minimum requirement to make their commitment highly visible.

Commitment: as used throughout this report refers to the status of a gambling provider regarding their implementation of the *Code of Practice*. Commitment to the *Code of Practice* is measured through responses to the questions of the self-administered *Queensland Responsible Gambling Code of Practice Phase 3 Survey*.

Committed Venue: a venue that has been assessed using the responsible gambling survey and has answered sufficiently to be found to be in compliance with all the practices contained in within the *Queensland Responsible Gambling Code of Practice*.

Community: is classified into two categories. In the first instance, the community sector refers to the Queensland community in aggregate and secondly, it refers to the gambling-related community support groups and organisations. These organisations are located in metropolitan, regional and remote locations and provide counselling and support to individuals, couples and families affected by problem gambling.

Consumers: are adults who participate in any form of legalised gambling in Queensland.

Culture: for the purposes of this report is 'the dominant set of learned, shared and interrelated behaviours within a society. This definition combines *culture as knowledge* and *culture as behaviour*'¹⁵. Society in this sense refers to the Queensland gambling industry.

Customer Liaison Officer(CLO): an employee nominated by the gambling provider to perform the role of the customer liaison officer and trained to provide assistance to customers with gambling-related problems, support staff in providing assistance to those customers and provide assistance to staff with gambling-related problems.

Department of Employment, Economic Development and Innovation (DEEDI): Following the State election in 2009, machinery of government changes resulted in the responsibility for gaming regulation and policy being located in DEEDI.

Exclusions: There are two types of exclusions in Queensland: self-exclusion and venue initiated exclusion. Self-exclusion (self-ban) occurs when a person approaches a gambling provider and asks to be excluded from the whole or part of the venue because of concerns relating to their gambling; and venue-initiated exclusion occurs when a gambling provider excludes a person from whole or part of their venue because of concerns relating to the gambling behaviour of the person.

Gambling Help Line: The Gambling Help Line is a telephone counselling, information provision and referral service. It provides a 24-hour, 7-day a week point-of-entry for people seeking help with gambling problems. There is no charge for Queensland callers to the Gambling Help Line.

Gambling Help service: is a specialist support service which provides face-to-face counselling and assistance to people with gambling problems, their families and friends, as well as community education, training and networking activities. Gambling Help Service providers are located in 14 areas across Queensland – Brisbane, Caboolture, Cairns, Gold Coast, Hervey-Bay, Ipswich, Logan, Mackay, Mt Isa, Longreach, Rockhampton, Sunshine Coast, Toowoomba and Townsville.

Gambling Help Service System: is the government funded system comprising of the Gambling Help Line, the Gambling Help services, the Gambling Help Directors Network and the inpatient and outpatient service offered by the Moonyah Alcohol and Drug Rehabilitation Centre.

Gambling industry: refers to the seven industry sectors that provide legalised gambling in Queensland. These are: club, hotel, casino, lottery, totalisator betting, bingo, race club, and charitable and non-profit gambling.

¹⁵ Vecchio, R., G. Hearn and G. Southey (1998). *Organisational Behaviour: Life at Work in Australia*, First Edition, Harcourt Brace Jovanovich: Sydney.

Gambling industry peak bodies: are organisations representing the various gambling industry sectors. These include Clubs Queensland, Golden Casket Lottery Corporation Limited, Queensland Hotels Association, Tabcorp Casinos, UNiTAB, Bingo Operators, Charitable and Non-Profit, Thoroughbred Association, Harness Racing, and Greyhound Association.

Gambling provider: A gambling provider is a person or organisation that legally supplies one or more gambling products to consumers in Queensland. Gambling products consist of casino table games, electronic gaming machines, lottery products, off-course wagering, on-course wagering, bingo, keno, and charitable and non-profit activities. Gambling providers operate in the club, hotel, casino, lottery, totalisator betting, bingo and racing sectors.

Gambling-related support services: refer to the system comprising the government-funded Gambling Help Service System plus non-government funded support services. The latter may include, but not limited to, support providers such as Gamblers Anonymous, the Salvation Army and independent counsellors.

Information Display Board: The Information Display Board is a sign located within a designated gambling area. It contains the phone number for the Gambling Help Line and highlights to the reader that further information can be provided by the gambling venue regarding the venue's responsible gambling policy, the player information guide, exclusion provisions, responsible gambling and elements of the financial transactions policy at the venue.

Moonyah Alcohol and Drug Rehabilitation Centre: is run by the Salvation Army. It receives funding as part of the Gambling Help Service System and provides inpatient and outpatient treatment programs to people experiencing gambling problems.

Office of Liquor and Gaming Regulation (OLGR) (previously known as the Queensland Office of Gaming Regulation - QOGR and the Office of Liquor, Gaming and Racing): regulates and monitors the conduct of gambling within Queensland. This encompasses the regulation of casinos, charitable gambling, electronic gaming machines, interactive gambling, keno, lotteries and wagering. OLGR is located in DEEDI.

Office of Regulatory Policy (ORP): incorporates the Policy and Harm Minimisation Division formerly located in OLGR. ORP is responsible for evidence-based policy development and managing the *Queensland Responsible Gambling Strategy*. ORP is located in DEEDI.

Problem gambling: is characterised by difficulties in limiting money and/or time spent on gambling, which leads to adverse consequences for the gambler, others, or for the community.

Responsible gambling: occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and government to achieve outcomes that are socially responsible and responsive to community concerns.

Responsible Gambling Advisory Committee (RGAC): provides advice to the Queensland Government on gambling policy and issues; promotes and monitors partnerships between the community, industry and government, and provides a forum for the exchange of information and views about gambling.

Queensland Office of Gaming Regulation (QOGR) now known as the Office of Liquor and Gaming Regulation (OLGR).

Queensland Treasury: provides core economic and financial policy advice to the Queensland Government, as well as services to the community, to enhance the State's financial position and economic performance, supporting sustainable long-term economic growth. Prior to the State election in March 2009, OLGR was a portfolio office of Treasury.

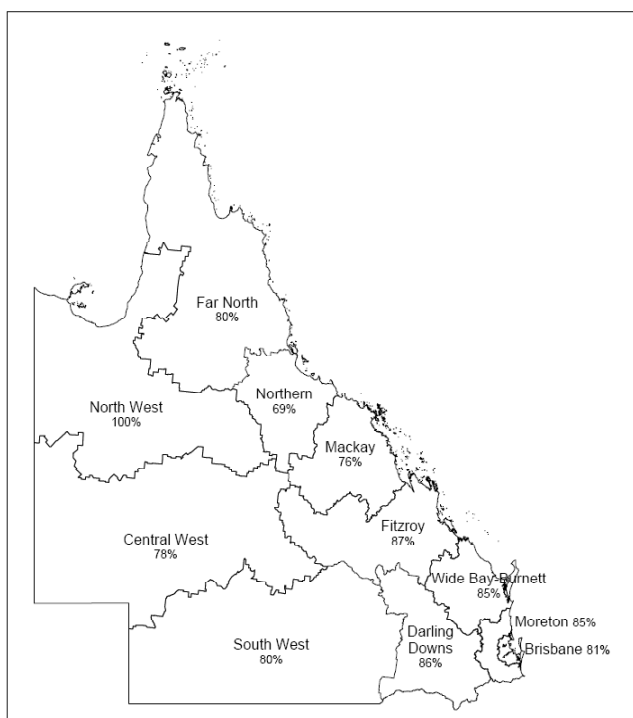
6. Appendix 2: Findings and Recommendations of the Phase 2, Cultural Shift Review

No.	Finding	Recommendation	Action
1	There is limited awareness of the Queensland Responsible Gambling <i>Code of Practice</i> amongst adult Queenslanders. Awareness and understanding of the <i>Code of Practice</i> is essential to establishing agreed standards for the safe and supportive provision of gambling services.	Examine methods to promote the <i>Queensland Responsible Gambling Code of Practice</i> to the Queensland community and better promotion of the Code's key practices with gambling consumers	<p>Display by OLGR at the Royal Association Exhibition (Ekka). Involvement of OLGR in future Gambling Awareness Weeks. Refresh of the Responsible Gambling Community Awareness Campaign by Treasury.</p> <p>New responsible gambling signage project as commissioned by OLGR.</p> <p>New series of signs and takeaway cards for gambling providers as developed by OLGR.</p> <p>Periodic evaluation of effectiveness of all signage displayed by gambling providers undertaken by OLGR.</p>
2	Training is an ongoing, critical practice to ensuring that there is a shared understanding among gambling employees about responsible gambling practices. Implementing suitable training practices requires improvement in the club, hotel, bingo and racing sectors.	Examine methods to reinforce the importance of, and support for, ongoing training in responsible gambling practices within the club, hotel, racing and bingo industry sectors.	<p>Further promotion of the Industry Training Kit comprising a Training Workbook and Training DVD by OLGR and industry peak bodies.</p> <p>Announcement of a new package of harm minimisation measures including mandatory training for venue employees with direct responsibility for gambling, including CLOs.</p>

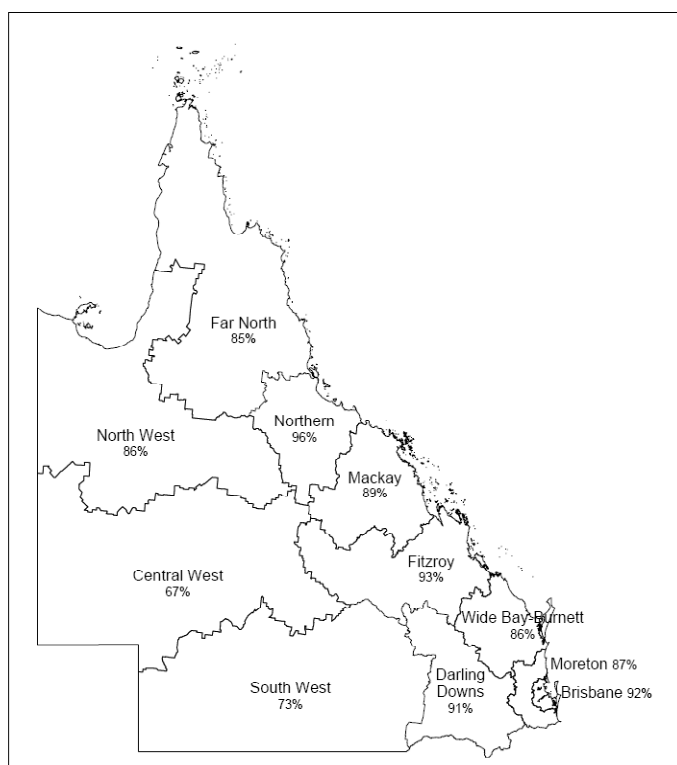
3	Comprehensive definitions of rights and responsibilities for each stakeholder group are yet to be developed and documented. The RGAC will pursue this following the completion of the 5 year review period of the <i>Queensland Responsible Gambling Code of Practice</i> in 2007.	The RGAC maintain their commitment to developing and documenting comprehensive definitions of rights and responsibilities for each stakeholder group following the completion of the 5 year review period of the <i>Queensland Responsible Gambling Code of Practice</i> in 2007.	Initial terms for rights and responsibilities have been endorsed by the RGAC. A Working Party of the RGAC is to further develop the rights and responsibilities, and their application to stakeholder groups.
4	A large proportion of small and micro clubs and hotels, clubs and hotels in isolated regions, bingo operators and race clubs are not committed to the <i>Queensland Responsible Gambling Code of Practice</i> .	Investigate means of increasing commitment to the <i>Queensland Responsible Gambling Code of Practice</i> across small and micro clubs and hotels, clubs and hotels in isolated regions, bingo operators and race clubs.	Further promotion of Quick Guides for Bookmakers and Bingo and development of resources for the Charitable and Non-profit sector. Further promotion of the Industry Training Kit with DVD. Liaison with industry peak bodies and local Gambling Help services to develop specific assistance packages.
5	Activities designed to promote the implementation of safe and supportive environments as promoted by the <i>Queensland Responsible Gambling Code of Practice</i> predominantly attract gambling providers already committed to the provision of responsible gambling.	Explore options to encourage gambling providers that are not committed to the <i>Queensland Responsible Gambling Code of Practice</i> to participate in activities designed to promote the implementation of safe and supportive gambling environments.	The Gold Coast Responsible Gambling Network demonstrates best practice in effective relationships between industry and Gambling Help services. OLGR provides the network with secretarial support.
6	Government and gambling provider complaint handling processes are infrequently used by consumers.	Investigate whether consumers are sufficiently informed about the existence of current mechanisms for raising responsible gambling issues with gambling providers and the Government and whether such mechanisms are fit for purpose.	A new Government data base has been developed to provide a more efficient mechanism for recording complaints and breaches of <i>Code of Practice</i> . Enhancements to the Gambling Help Service System will provide better methods for checks of responsible gambling.

7	<p>Relationships between gambling providers and gambling-related support services have significantly improved since the Implementation Review. However, a large proportion of clubs, hotels, bingo providers and race clubs do not have an established link with a local gambling-related support service. Some gambling-related support services also report difficulty establishing and maintaining relationships with gambling providers.</p>	<p>Develop strategies to improve the engagement between clubs, hotels, bingo providers and race clubs and gambling-related support services.</p>	<p>Further promotion of Quick Guide for Bingo and development of resources for, Charitable and Non-profit sector, and for bookmakers</p> <p>Announcement of a new package of harm minimisation measures.</p> <p>Encourage and foster the development of networks similar to that operating on the Gold Coast (Refer Item 5).</p>
8	<p>Many gambling providers have connections to gambling-related support services such as Gamblers Anonymous, the Salvation Army and individual counsellors outside of government funded Gambling Help services</p>	<p>Examine methods to ensure gambling-related support services not funded by the Queensland Government receive relevant information on the <i>Queensland Responsible Gambling Code of Practice</i>.</p>	<p>Development of self help brochures to assist those not following up on referrals to Gambling Help service providers.</p>
9	<p>Culturally and linguistically diverse groups are an under-represented proportion of Gambling Help service clients and Gambling Help Line callers.</p>	<p>Develop strategies to raise awareness and provide support services appropriate to culturally and linguistically diverse groups.</p>	<p>Government projects are underway to develop communication strategies and materials for CALD and Indigenous individuals and communities</p>

7. Appendix 3: Commitment levels of clubs and hotels



Commitment level of clubs by location – 2006 Phase 3 Survey



Commitment level of hotels by location – 2006 Phase 3 Survey

8. Appendix 4: References

Queensland Office of Gaming Regulation 2007, *Queensland Responsible Gambling Code of Practice Report on the Cultural Shift Review*, Queensland Government, Brisbane.

Queensland Office of Gaming Regulation 2007, *Results of the 2006 Queensland Survey of Gaming Machine Venues*, Queensland Government, Brisbane.

Queensland Office of Gaming Regulation 2004, *Queensland Responsible Gambling Code of Practice Report on the Implementation Review*, Queensland Government, Brisbane.

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Queensland Treasury 2008, *Queensland Household Gambling Survey 2006-07*, Queensland Government, Brisbane.

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