

“First Review of the Responsible Gambling Mandatory Code of Practice for Tasmania”

Submission by:

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Attention:

Mr Greg Partridge
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The Goodstone Group are pleased to offer comment regarding initiatives tabled we view as pertinent in the options paper “First Review of the Responsible Mandatory Code of Practice for Tasmania”

Preamble

The Goodstone Group (Goodstone) have been operating for 20+ years as a North West Coast based hospitality group operating 9 venues that incorporate Electronic Gaming Machines (265 under operation) and a broad array of hospitality services including accommodation, food (restaurant/bistro/cafes) , bars, Nightclub, bottleshops, functions, other gaming including Wagering and Keno. We employ approximately 350 staff and our facilities cater for both locals and tourists. Our venues operate in both cities and smaller country townships.

Goodstone is extremely committed to effective responsible gambling in all of our establishments and pride ourselves on the effective training of our staff. This ensures we contribute positively to deliver effective harm minimisation measures for problem gamblers within our venues. The vast majority of our customers gamble responsibly and we are of the strong opinion that current responsible gambling measures in place are working well. We do respect the Commission’s position to review practices to minimise harm but at the same time believe that if current measure are principally effective there is no need for radical change. Any changes should be well balanced to ensure in task they are sensible, practical and to enable continued viability for operators.

We do not support any changes that are at the expense of the majority of Tasmanians and tourists who gamble responsibly and enjoy Gaming as a legitimate form of entertainment. Tasmania holds one

of the lowest problem gambling % rates of any state in the country, this result level is something we should be extremely satisfied with. Tasmanian operators already operate in a highly regulated gambling environment when we compare current restrictions to other jurisdictions.

Gaming is an extremely important part of the overall Goodstone business and is a significant contributor to the employment of many of our staff. Gaming also has on-flow benefit to our many suppliers and trading partners such as building companies. The continued inclusion of gaming in Goodstone venues is imperative to ensure we remain viable. Any significant changes that impact gaming will directly impact the viability of our business, our employment levels and future investment into renovations and improving our facilities for Tasmanians and tourists. It is imperative that any changes considered from a gaming perspective are considered with common sense and that a well balanced approach is followed.

We have concerns over options stated in the First review. The key initiatives we would like to comment on are as follows:

1. Advertising - Limit or ban EGM advertising on the premises except for directional signage (e.g. signs must not be illuminated or contain decorative edging, pictures and symbols that draw immediate attention)

- A common sense approach here is required.
- Venues need the right to advertise their facilities to locals and tourists
- Illuminated signage is required to advertise of a night – this is essential
- Venues also need signage to advertise restrictions to Gaming Rooms (e.g. minors)
- We should have the right to advertise our facilities to all our customers who can make a personal choice to enter facilities within our venues.

2. Ensure that sounds associated with gambling are not audible outside gambling areas.

- We strongly oppose this option.
- What evidence is available to substantiate this option will improve harm minimisation?
- Some gaming venues have doors between other areas, some do not and are part of the natural flow of a venue.
- The significant cost implications here for operators to implement changes of “sound proofing” would be prohibitive and extremely difficult to implement structurally.
- Any changes tabled here are simply not practical.

3. For EFTPOS withdrawals, require staff to check the patron’s identity against the Tasmanian Gambling Exclusion Scheme and also maintain a register of cash withdrawals to identify multiple withdrawals (for example, recording last four numbers on a card).

- We strongly oppose this option
- This option is not practical
- Privacy Issues with confidential information is a problem with this option

- There will also be security issues with recording information
- This option has considerable time implications for staff
- This would be unfair to the majority of our customers who act responsibly
- How would this option make responsible locals and tourists feel?

4. Permit one EFTPOS withdrawal at a maximum \$200 or \$100 per patron per day for any purpose.

- We strongly oppose this option
- Venues offer many more facilities than just gaming.
- This option is not fair to customers who utilise other venue facilities
- Customers enjoy the safety of accessing cash within our venues – this is an important service offered.
- If customers want to get access to more cash they can already find an ATM anyway to access more than the limit of \$200
- Tourists have an expectation they can access a reasonable amount of cash within our venues
- In some regional areas there is a low provision of ATM's so this is a valuable service to customers
- Current limit of \$200 is already viewed as a low level by our customers of whom the vast majority gamble responsibly.
- The current legislated requirements should not be changed.

4. (A) Require Coin Machines to be located behind the bar forcing patrons to interact with staff to exchange money.

- The provision of coin machines in venues is a valuable service offered to the majority of players who act responsibly.
- Many venues have limited space available in service areas so incorporating machines would be problematic.
- This option would add significant wage costs to venues and impact the viability of some venues.

4. (B) Require staff to check identification against the Tasmanian Gambling Exclusion Scheme before providing the cash exchange.

- Common sense should be required here
- This is not practical
- Staff are already diligent in this area when it comes to Problem Gamblers
- Effective signage should be the best method here for EFTPOS requirements

- It is unreasonable to request venues to “police” where customers are going to spend their money. This is not fair to the majority of customers who act responsibly.

5. (A) Reduce the maximum cash limit for Keno and EGM payouts to \$500.

- The current level of \$1,000 appears to work satisfactorily, however tourists do not understand it or like it.
- The requirement to write more cheques would increase astronomically
- The implications here for staff are significant as is the impact on labour costs.

5. (B) Require winnings above \$500 to be transmitted electronically to the player’s bank account.

- This is not an practical option
- Privacy issues here are a problem
- We cannot expect staff to have this responsibility

Should you wish to discuss these matters further or require any more details please feel free to contact me directly on 6425 1197 or mbest@goodstone.com.au

Yours sincerely,



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