

National Council of Women Tasmania Inc.

Affiliated with the National Council of Women of Australia and the International Council of Women through the National Councils of Women Coalition of Tasmania

Motto: "Do unto others as you would they should do to you"



Submission to the Second Review of the Responsible
Gambling Mandatory Code of Practice for Tasmania

Established in 1899, the National Council of Women of Tasmania has always strived to conserve the highest good of the family and of the State. It works across all sectors, seeking to achieve equity and security across all endeavours that encompass life in Tasmania. NCWT has been expressing concerns about gambling, in particular, electronic gaming machines for a good many years. So we appreciate that there is a review into the Responsible Gaming Mandatory Code of Practice for Tasmania, and appreciate the opportunity to make a submission.

The three points being considered in the consultation paper are:

1. Advertising externally to the venues and the need to protect children and other vulnerable persons appropriately from potential harms
2. Options to mitigate the potential for increased gambling from inducements.
3. Determining what measures are required to ensure a loyalty programme offered by a venue or third party does not lead to increased gambling.

1. **Advertising** With the new EGM licensing arrangements, venues are likely to compete with each other for their share of the punters and no doubt external advertising would be considered as a means to compete. However outdoor signage/displays advertising or promoting gaming machines should be banned. This includes any advertising external to the physical venue, including radio, television and online mediums.

The point of advertising is to attract consumers to the advertiser's products or services that are on offer, and to spend their money. Unfortunately with EGMs there is a net loss to the consumer. The more the consumers lose, the more the venue operator

gains with no net return to the consumer. Moreover it is the more vulnerable persons, the problem gamblers and high moderate risk gamblers who spend the most and have the most to lose. (Social and Economic Impact studies of Gambling in Tasmania) The venues stand to gain the most from attracting these vulnerable persons to their premises. External advertising will not only attract vulnerable persons but it will reinforce their compulsion to engage in risky gambling losses.

The provision of information, by venues, about gambling, regulatory requirements for gambling and gambling support services will not be sufficient to balance the attractiveness of gambling sold to them from outside advertising. In fact outside advertising will provide an imbalance to any information provided within the venues.

So in order to protect children and other vulnerable persons from the potential harms of advertising, there needs to be a ban on all forms of advertising, as is the case with tobacco.

Moreover, if the provision of information, by venues, about gambling regulatory requirements for gambling and gambling support is to be most effective in helping patrons understand the nature of gambling and make informed decisions, then there also needs to be a constant review of this provision of information. Information becomes stale very quickly if it is not constantly reviewed.

2. **Inducements** : As with advertising, inducements are designed to attract the punter so that there will be a net gain to the venue. This net gain will come from increased gambling, in other words from the patrons' losses, in particular the losses from the vulnerable gamblers (see further the Social and Economic Impact studies of Gambling in Tasmania). In order to mitigate the potential for increased gambling from inducements, there should not be any inducements. This includes both inducements for gambling purposes and non gambling purposes. A voucher for a free meal or accommodation is still an inducement to gamble on the venue's premises.
3. **Loyalty programmes**: Similarly if the main aim of a loyalty programme is to ensure return visits to the venue for gambling purposes, then it should be banned. Rewarding players for their number of visits or the amount they spend on the EGMs increases the

risks to the problem gambler and high moderate risk gamblers. It is these groups that are going to spend the most money and consequently it is these groups that will lose the most money. They are already vulnerable and their vulnerability should not be encouraged.

On the other hand, if the main aim of a loyalty programme is to really care for its patrons and minimise their losses, maybe this could be considered. This would involve venues taking responsibility for their patrons, ensuring that they do not gamble more than they can afford or more often than they can afford. It would involve active consultation with the patrons, firstly to establish their boundaries and then to enforce those boundaries. This type of loyalty programme would tie in with the provision of information helping patrons understand the nature of gambling, and make informed decisions. It would require appropriate staff training so that staff could keep an eye on the patrons and intervene as appropriate, just as with responsible serving of alcohol. The Commission would need to ensure a clear set of criteria for this type of loyalty programme to demonstrate that its main purpose is to mitigate the losses of the gamblers.

The National Council of Women of Tasmania Inc. thanks the Commission for undertaking this important review.

If any clarification of the NCWT submission is required, please let us know.

Dorothy Kelly,
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