

**Stakeholder Submission to the Second Review of the Responsible Gambling  
Mandatory Code of Practice for Tasmania  
From the Quaker Peace and Justice Committee, Tasmania Regional Meeting**

Quakers have always struggled with the concept of gambling in so far as it results in someone profiting from someone else's loss. However given that there are a number of parliamentary sanctioned forms of gambling in Tasmania, we commend the Tasmanian Liquor and Gaming Commission on having a *Responsible Gambling Mandatory Code of Practice* which is required to be reviewed regularly. We appreciate the opportunity to respond to the *Stakeholder Consultation Paper*.

**1. Outdoor signage/displays advertising or promoting gaming machines:**

The purpose of advertising gaming machines external to the venue is to attract patrons; venue operators view any advertising cost as a net gain through increased patronage and expenditure and increased patron losses. Moreover, in so far as the venue operators seek increased patronage, it must surely be the *higher moderate risk gamblers* and *problem gamblers* whom the venues really want to attract because they spend the most money as clearly demonstrated by the Social and Economic Impact Studies on Gambling in Tasmania. EGMs are still the main cause of gambling harm in spite of an increase in online gambling. (SEIS) It is these gamblers who lose the most money and whose excess gambling causes social harm through financial stress, relationship breakdown, emotional stress of the family, poor performance at work, lost employment, property crime etc. (See further SEIS) These costs have further adverse implications on society.

The *higher moderate risk gamblers* and the *problem gamblers* should not be exposed to advertising. External advertising is designed to attract customers and it normalises and encourages their gambling behaviour. Furthermore it provides an information imbalance with regard to the potential for gambling harm. Vulnerable people need to be protected not roused. It is difficult to see how outside advertising can be quarantined to protect the vulnerable. Vulnerable people may be from lower socio economic groups because they may not be as financially secure; it also includes people with mental health issues, people facing unfortunate life circumstances such as bereavement, loss of a job. These people cannot be quarantined from the adverse effects of outside advertising.

So in order to appropriately protect children and other vulnerable persons from potential harm there should be a ban on all advertising outside the venue.

**2. Mitigating potential for increased gambling from inducements.**

The main aim of inducements is to entice patrons into the venue or to stay in the venue longer. The venue operator clearly expects a net gain on any money spent on inducements; inevitably this comes from increased gambling. The most effective way to mitigate this potential is to ban all inducements used for gambling purposes. Similarly vouchers for non-gambling purposes are still an inducement used for gambling purposes. The aim is to get patrons into the venue

to spend their money. *Higher moderate risk gamblers* and *problem gamblers* cannot be quarantined from this ploy. Venue operators should be prohibited from offering free vouchers for any purpose.

If venues wish to gain the competitive edge then they need to provide improved services of a more generic nature such as better car parking, better dining facilities, comfortable rest rooms. Improved services will interest the general public and are less likely to provide a trigger to the vulnerable gambler.

### **3. Reviewing player loyalty programmes.**

In so far as a player loyalty programme offers inducements that incentivise the patron to come back (or stay longer) and continue gambling then they should not be allowed. This sort of programme will increase the risk to the *higher moderate risk gamblers* and *problem gamblers*. Rewarding patrons for the number of visits they have to a venue or rewarding them for how much they spend increases the risk to the gambler. The benefit of any such loyalty programme is clearly to the venue operator rather than the patron. It should not be allowed to operate.

However there may be a case for a loyalty programme that primarily aims to minimise harm from gambling such as where patrons make a pre-commitment. The programme would need a level of criteria that requires the venue to show its responsibility towards the patrons, and more importantly to interact with them especially if the patrons are exceeding their boundaries. The primary purpose would have to be to protect the patron by minimising the level of harm that they could achieve in that venue. The key lies in ascertaining what is the primary purpose of the programme.

### **4. Staff training**

The last point actually segues into the need for staff training in harm minimisation. Just as Responsible Serving of Alcohol training is required for people serving alcohol, there needs to be a corresponding level of training for people employed in gaming venues. This does not necessarily require an intervention by junior members of staff but they should be trained and encouraged and supported to report concerns to an available supervisor who can act. Whilst the Commission has not included staff training in its stake holder consultation, staff training really should be a requirement of the licence. It is essential to harm minimisation.

### **5. Dissemination of information to players**

Similarly the provision of information about gambling, regulatory requirements for gambling and gambling support services so that players can understand the nature of gambling and make informed decisions about participating in gambling is essential to harm minimisation. In order to maximise the effectiveness of this strategy, it needs to be reviewed regularly otherwise it will be ignored and not effective at all. Even if the information does not change, its delivery needs to change on a regular basis in order to maximise its attention and reception. So we urge the Commission to also consider this in the current review.

**Conclusion**

Thank you again for the opportunity to participate in this review and we are open to further discussion so please feel free to contact us.

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