Part of the Solution

Clubs Promoting a Culture of Responsible Gambling
INTRODUCTION

This document represents the gaming industry’s recommendations for policy reform in further addressing the issue of problem gambling in Australia. The plan draws on a wide range of academic, industry and government sources and recommends a multi-faceted approach to tackle the complexities of problem gambling.

EXECUTIVE SUMMARY

Gambling is an enjoyable recreational pursuit for millions of Australians and provides significant social and economic benefits to the community in terms of entertainment, employment, taxation revenue and funding for social and sporting infrastructure and community organisations. However, for a small minority of players, excessive gambling causes harm, for themselves and for their families.

The gambling industry has worked cooperatively with state and territory governments for many years to implement proven, cost effective harm minimisation policies which have resulted in falling problem gambling prevalence rates across all Australian jurisdictions. Australia is a global leader in gambling harm minimisation, and has among the lowest problem gambling prevalence rates in the world.

When considering new policies to further improve the culture of responsible gambling among all stakeholders, all parties should work together constructively and transparently, and follow best practice guidelines for effective and efficient policy-making. Best practice regulation processes are well understood, but sometimes overlooked for reasons of political expediency. All stakeholders must resist the temptation to adopt emotionally-driven, reactive silver bullet solutions and pursue a rigorous regulatory impact assessment before adopting and implementing new proposals.

Not all harm minimisation measures are the result of government intervention, and the industry has trialled and initiated many policies to the benefit of its customers and employees. A recent example is the implementation of a multi-venue self-exclusion online program. The industry is also finalising the introduction of a consumer narrative advocacy program administered by Unifam and the trialling of a club chaplaincy program administered by the Salvation Army that promotes intervention and treatment for problem gamblers. The industry firmly believes that problem gambling is a complex issue which afflicts people through different causal pathways, and requires targeted solutions that best address the individual’s own needs.

A multifaceted, holistic approach which promotes a culture of responsible gambling and increases the help-seeking rate among problem gamblers is the best way of reducing the social costs of problem gambling. This requires a suite of prevention, intervention and treatment measures tailored to respond flexibly to the circumstances of the individual problem gambler. Importantly, greater community engagement to de-stigmatise gambling addiction and treatment will strengthen the safety net and improve the readiness of family and friends to identify and make an early intervention for those most in need.
RECOMMENDATIONS

1. Ban on All Forms of Credit Betting

Government should introduce legislation to ban credit betting on all forms of gambling, with the exception of VIP casino clients and licensed bookmaker account holders subject to due process.

2. Promote Informed Choice

In order to promote informed choice for patrons all forms of gambling should be required to provide improved consumer information. The information should include at a minimum:

- an explanation of how the game works
- an explanation of the ‘house edge’
- an explanation of cost of play and volatility
- a correction of common misconceptions.

3. Voluntary Pre-commitment

Governments should work with industry to introduce voluntary pre-commitment in a cost-effective manner that provides venues with the flexibility to choose the technological solution that best suits their needs.

4. School-based Education and Awareness Programs

Governments should develop and trial school-based education programs to improve knowledge and awareness of problem gambling. The program should:

- dispel common myths about gambling and educate people about how to gamble responsibly
- highlight potential future consequences associated with problem gambling, and
- make the community aware of behaviours indicative of problem gambling, to encourage earlier help-seeking or interventions by family and friends.

5. National Advertising Campaign to Promote Responsible Gambling

Governments should work with industry to develop a national advertising campaign to promote responsible gambling. The campaign should provide key strategies for gambling responsibly, deliver a cost-effective and targeted message via venue websites, social media and in-venue materials.

6. Staff Early Intervention Strategies

Governments and industry should collaborate to introduce responsible gambling training that provides staff with the necessary skills to identify problem gambling and intervene by respectfully engaging with patrons and offering assistance.
7. Family Intervention Strategies

Family members should have the capacity to initiate a third party intervention on behalf of a problem gambler. Venues should be required to promote the availability of family interventions and have an obligation to respond to an intervention request by respectfully offering assistance. Where the alleged problem gambler refuses assistance, family members should have the capacity to apply to governments to request an order for involuntary exclusions or mandatory counselling, subject to examination of the complaint.

8. Screen Kit for Health Professionals

A screening kit should be developed for healthcare professionals and community service workers that provides a simple tool for screening high-risk clients and provides them with information about the appropriate treatment referral options.

9. Improved Self Exclusion

Self-exclusion should be improved to facilitate problem gamblers initiating a multi-venue self-exclusion in one simple process. This technology has recently been introduced in NSW following a six-month trial and has received strong support from counsellors and problem gamblers. The technology allows problem gamblers the option of banning themselves from multiple venues in the presence of a gambling counsellor.

10. Improved Promotion of Treatment Options

Responsible gambling codes of practice should be updated to require all gambling operators to ensure that links to online gambling help services are provided in a prominent place on their websites. In addition, all stakeholders, including Government, industry and community groups should regularly advertise gambling help services through their social media feeds.

11. Establish a National Gambling Research Program

To address the dearth in quality gambling research the industry recommends the development of a national gambling research program jointly funded by all state and territory governments. The national research program would be responsible for ensuring that all government funded research into gambling is consistent with best practice research standards and has direct relevance to gambling policy. In addition, each state and territory government should consider establishing their own dedicated gambling research centre to facilitate expeditious research into national and jurisdictionally specific gambling policy issues.
KEY ISSUE

Gambling is an enjoyable recreational pursuit for millions of Australians and provides significant social and economic benefits to the community. However, a small minority of people gamble excessively causing themselves and their family harm.

The gaming industry is committed to a policy of minimising the harm associated with problem gambling in a manner that ensures a sustainable and vibrant gaming industry.

POLICY OBJECTIVES

The following objectives have been identified as a means of achieving a commitment to both harm minimisation and sustainable industry development:

Objective 1 - Promote a culture of responsible gambling

Consistent with a public health approach, the primary goal of this policy is to promote a culture of responsible gambling among all stakeholders, ensuring both healthy communities and a vibrant and sustainable gambling industry.

Objective 2 - Reduce the prevalence of problem gambling

A key indicator of the success of responsible gambling policy is measured by the problem gambling prevalence rate. A reduction in the prevalence rate of problem gambling will require a combination of prevention, intervention and treatment measures.

Objective 3 – Engage with problem gamblers to encourage help-seeking

A small percentage of problem gamblers currently acknowledge or seek treatment for their gambling problems. Engaging problem gamblers to increase the rate of problem recognition and help-seeking would contribute to a reduction in gambling related harm.

Objective 4 - Employ the whole of community in tackling problem gambling

Providing information and tools to healthcare professionals, community groups, family and friends in a whole-of-community approach would be an important step forward in the fight to identify and tackle problem gambling.

Objective 5 - Develop a strong research base to inform harm minimisation policies

There is currently a significant gap in the research around the efficacy of various harm minimisation and responsible gambling initiatives. Addressing this gap in the research is essential to creating effective strategies to combat problem gambling and would save costs that might otherwise be realised if untested proposals were implemented.
INDUSTRY BACKGROUND

Gambling in Australia

Gambling is an enjoyable recreational pursuit for millions of Australians and provides significant social and economic benefits to the community in terms of entertainment, employment, taxation revenues and funding for social and sporting infrastructure and community organisations. Whether it is a punt on the Melbourne Cup, a game of two-up on ANZAC Day or having a quick flutter on the pokies, gambling is an integral part of the Australian culture.

- An estimated 70 percent of Australians participate in some form of gambling each year.¹
- The Productivity Commission estimated gambling provided the Australian community with a net social benefit of between $3.7 billion and $11.1 billion in 2008-09.²
- Over 200,000 Australians are employed in businesses that provide gambling activities.³
- The total expenditure on gambling in 2008-09 was $19 billion representing 2.4% of household disposable income (HDI).⁴
- Gambling expenditure as a percentage of HDI has declined significantly over the last decade and is now at the lowest levels since 1993–94.⁵
- Australian governments receive around $6.3 billion in annual gambling taxation revenue.⁶

There are a wide variety of gambling products and services available to the Australian public including poker machines, lotteries, keno, horse racing, greyhound racing, sports betting, casino table games, online poker and online casinos.

Gambling products and services are offered by a wide range of business entities including those that integrate gambling into a wider service offering such as newsagents, hotels, clubs and casinos. There are also a number of dedicated gambling businesses such as bookmakers, totalisator agencies and online gambling operators (both domestic and offshore).

Problem Gambling in Australia

While the vast majority of the population enjoys gambling as a healthy recreational pursuit, a small minority of people gamble excessively and in doing so cause themselves and their family harm. Gambling Research Australia defines problem gambling as follows:

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.⁷

Problem gamblers and their families typically experience adverse impacts on their health, jobs, finances, emotional state and relationships.

² Ibid p.48
³ Ibid p.2.14
⁵ Ibid
⁷ Gambling Research Australia, Problem Gambling and Harm: Towards a National Definition (2005)
In 2010, the Productivity Commission estimated that there are an estimated 112,000 problem gamblers in Australia (0.7 percent of the adult population). In addition, the Commission found that there are 95,000 problem gamblers who regularly play poker machines and that they account for between 22 percent and 60 percent of total poker machine revenue.

However, both KPMG Econtech\(^8\) and the Institute of Public Affairs\(^9\) (IPA) identified serious methodological flaws in the Commission’s methodology for calculating the prevalence rate and expenditure share for problem gamblers. The flaws include using outdated surveys that have been superseded by more recent data and failing to apply statistical weighting to surveys to account for the vast differences in population sizes between the various states and territories. This resulted in the Commission’s estimates of the number of problem gamblers and their share of total poker machine expenditure being grossly inflated. The IPA released a report that addressed the methodological flaws in the Commission’s analysis and found that:

- there are approximately 75,300 problem gamblers in Australia (0.49 percent of the adult population)\(^10\)
- approximately 60,000 problem gamblers play poker machines regularly and contribute between 10 and 20 percent of total poker machine revenue.\(^11\)

The prevalence rates and estimated social costs associated with problem gambling are substantially lower than other public health issues such as obesity, smoking, mental illness, problem drinking and illicit drug use (see Table 1). This indicates that a more measured policy response to problem gambling may be required than for other key public health issues. Regardless there is a consensus among all stakeholders that problem gambling is an important issue that warrants further action in relation to harm minimisation.

### Table 1: Comparison of the Magnitude of Public Health Concerns

<table>
<thead>
<tr>
<th>Public Health Concern</th>
<th>Prevalence Rates(^a)</th>
<th>Estimated Social Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obesity</td>
<td>25.0%</td>
<td>$58.2 billion(^b)</td>
</tr>
<tr>
<td>Smoking</td>
<td>19.0%</td>
<td>$31.5 billion(^c)</td>
</tr>
<tr>
<td>Problem Drinking</td>
<td>3.4%</td>
<td>$15.3 billion(^d)</td>
</tr>
<tr>
<td>Illicit drug use</td>
<td>2.4%</td>
<td>$8.2 billion(^e)</td>
</tr>
<tr>
<td>Problem gambling</td>
<td>0.5%(^f)</td>
<td>$4.7 billion(^g)</td>
</tr>
</tbody>
</table>

**Note:** The social cost estimates used in this table are the subject of widespread dispute and are shown for comparative purposes only.


\(^10\) Ibid p.2

\(^11\) Ibid p.2
State and Territory Governments are responsible for the regulation of gambling in Australia, with the exception of the Federal Government’s involvement in the regulation of online gambling through the Interactive Gambling Act 2001. Coordination at a national level between Federal, State and Territory Governments occurs through the Council for Australian Governments (COAG) Ministerial Committee on Gambling Reform.

Existing Harm Minimisation Measures

State and territory governments in conjunction with industry have adopted a wide range of harm minimisation and responsible gambling measures designed to reduce the harm caused by problem gambling. As a result, Australia is a global leader in gambling harm minimisation.12

For example, poker machines in Australia undergo an arduous approval process in which every aspect of their design is scrutinised for its potential to exacerbate problem gambling.

Box 1: Restrictions on Poker Machine Design Features

The following requirements are part of the Gaming Machine National Standards:

- Minimum return to player percentage
- Maximum bet, prize and cash input limits
- A ban on auto-play
- A ban on misleading display of results (e.g. falsely indicating a player just missed a jackpot)
- A ban on features that give the player an illusion of control over the outcomes
- Prize probability limits
- Limits on payout volatility
- Display of clocks.

Additional jurisdictionally specific restrictions also apply. For example, the NSW Gaming Machines Prohibited Features Register contains the following additional requirements:

- A ban on non-linear pay tables
- A limit on the maximum number of free spins
- A ban on depictions of real money (e.g. $50 notes)
- Restrictions on game names and themes
- A ban on player inducement messages (e.g. ‘try again’, ‘have another go’)
- Restrictions on advertising the maximum prize
- Further restrictions on the return to player for multi-denomination games
- A ban on requiring ante-bets to be eligible for jackpots
- Restrictions on button panel layouts
- Limits on ante-bets for feature games
- Restrictions on minimum bet (minimum bet should be 1 credit).

12 Identifying Problem Gamblers in Gambling Venues: Final Report, Gambling Research Australia, p.10
Many poker machine products available in international markets, such as the United States, are not approved in Australia due to the precautionary approach taken by state and territory governments towards harm minimisation and the approval of new poker machine features.

In addition, each jurisdiction also has a wide range of regulations governing the operation of poker machines in order to promote the responsible conduct among gaming operators (see Box 2).

**Box 2: Existing Harm Minimisation Regulations**

The harm minimisation regulations vary between different jurisdictions and venue types. However, the list below represents some of the more common regulations in force within Australia:

- Advertising restrictions or bans
- State-wide caps on the number of poker machines
- Social impact assessments prior to an increase in poker machine numbers
- Restrictions on minors accessing gambling
- Bans on inducements (e.g. free alcohol)
- Bans on credit gambling
- Payment of large prizes via cheque
- Restrictions on the locations of ATMs
- Mandatory shutdown periods
- Restrictions on cash promotions
- Self-exclusion schemes
- Provision of information about problem gambling help services
- Compulsory responsible gambling training for staff
- Clocks on gaming machines
- Signage creating awareness about the risks of excessive gambling.

Similar harm minimisation controls also apply to other forms of gambling to varying degrees. The inconsistency of harm minimisation regulation across different forms of gambling is a concern for the industry, particularly the lack of regulation applied to online gambling operators. For example, online gambling sites allow gambling on credit, have no maximum limits, no mandatory shutdown periods and freely advertise both on television and the internet. The industry takes the view that there would be significant benefits from harmonising the regulatory requirements across all forms of gambling but acknowledges the difficulties of doing so for operators outside of Australia.

Not all harm minimisation measures are the result of government regulation. Many measures are the result of industry self-regulation, such as voluntary codes of practice, or co-regulation, industry initiatives underpinned by government regulation.

The industry has recently completed a trial of a new multi-venue self-exclusion scheme and will soon be introducing a consumer narrative program as well as trialling a chaplaincy program (see box 3 for details).
Box 3: New Self-regulatory Initiatives

**Multi-venue self-exclusion**

ClubsNSW’s responsible gambling program ClubSAFE recently undertook a trial of a multi-venue self-exclusion scheme on the NSW central coast. The program allows a problem gambler to exclude themself from multiple venues in a single application; details of the applicant are then forwarded electronically to the relevant venues for enforcement purposes. State-wide roll-out commenced in early 2012 covering approximately 50% of poker machines in Australia and will be complete by late in the year. Further investigation will occur into the potential for a national multi-venue self-exclusion scheme.

**Consumer narrative program**

The ‘Consumer Voice’ project is a problem gambling advocacy program co-ordinated by Relationships Australia in SA. Club Safe in South Australia (a Recognised Industry Body by the South Australian Government) regularly engages ‘Consumer Voice’ Speakers in their Responsible Gambling awareness/training sessions with Clubs. The ‘Consumer Voice’ project is fully funded through the Gamblers Rehabilitation Fund, a joint initiative between the AHA (SA), Clubs SA, the Adelaide Casino and the Government of South Australia. The program involves training former problem gamblers to relate their personal narratives at public speaking events with a wide variety of audiences including:

- gambling help service sector
- hospitality workers, gaming venues
- community agencies
- counselling sessions of people affected by problem gambling
- high schools and
- other interested community members.

The program helps by raising awareness, de-stigmatising problem gambling and de-mystifying the treatment and recovery process. The industry is seeking to expand this program into other states and territories.

**Chaplaincy Program**

ClubsNSW is in the process of facilitating a trial of a club chaplaincy programs in conjunction with the Salvation Army. The program would see Salvation Army officers available at regular intervals in clubs to discuss a wide range of issues with patrons including those issues that are often the cause of problem gambling such as depression, anxiety, divorce or bereavement. Chaplains will screen patrons for problem gambling and advise them of specific gambling treatment options.

**Effectiveness of the Existing Regulation**

It remains difficult to judge the effectiveness of individual harm minimisation measures due to a lack of any formal evaluation processes. However, it is clear the assortment of responsible gambling and harm minimisation measures adopted by state and territory governments and the industry have contributed to a considerable reduction in problem gambling prevalence rates. This view is supported by the findings of the Productivity Commission:
Notwithstanding these various limitations in comparing studies over time, on balance, the Commission’s assessment of the evidence suggests that prevalence rates have fallen.\textsuperscript{13}

The problem gambling prevalence rates in Australia are now among the lowest in the world (see Chart 1). It is noteworthy that through a cooperative approach the problem gambling prevalence rates have reduced considerably with only a marginal impact to industry revenue. Nevertheless, a problem remains and more effective strategies can ensure further improvement.

\textbf{Chart 1: Comparison of International Problem Gambling Prevalence Rates (CPGI 8+)}

\begin{figure}
\centering
\includegraphics[width=\textwidth]{chart1.png}
\caption{Comparison of International Problem Gambling Prevalence Rates (CPGI 8+)}
\end{figure}

Note: Recent data not available for Western Australia and other international jurisdictions utilise alternate problem gambling screens, making a comparison unfeasible.

Occasionally governments have implemented measures that may appear politically attractive but in practice are less effective in achieving their intended objective of reducing the incidence of problem gambling or gambling related harm. These measures often impose significant costs on industry, waste government resources and come at the expense of a more effective means of addressing problem gambling. A common trait among these ill-considered measures is that they lack any credible evidence of their efficacy and have not been subject to sufficient trialling or a cost-benefit analysis.

The industry and governments need a framework to protect against policies that might have a detrimental effect on industry sustainability. For this purpose the industry supports the adoption of the COAG Guidelines for Best Practice Regulation when developing gambling policy (see Box 4).

The guidelines require that government undertakes a rigorous evidence-based regulatory impact assessment of all feasible policy options. To ensure transparency the government would be required to make publically available a Regulatory Impact Statement (RIS) outlining the impact assessment. A RIS typically includes a risk analysis, a cost benefit analysis, an assessment of the business compliance costs and the effects on competition.

**Risk Analysis**

A risk analysis that objectively quantifies the risks and harms associated with problem gambling is necessary to ensure that policy responses are commensurate with the magnitude of the problem. The analysis should also quantify the effectiveness of any proposed measures on reducing harm based on credible evidence. In addition, a risk analysis serves to identify those sections of the community who are most ‘at risk’ of developing a gambling problem. This permits the development of cost-effective responses that target high-risk groups as opposed to costly blanket solutions that impose unnecessary burdens on recreational or low-risk gamblers.

**Cost-Benefit Analysis**

A cost-benefit analysis is essential to ensure that the benefits of a measure designed to address problem gambling outweighs the costs. A full cost-benefit analysis forces government to consider the impacts of a proposal across the whole community including businesses, employees, community groups and consumers.

The gambling industry currently provides a sizeable annual net benefit to the community of up to $11.1 billion.\(^\text{14}\) It is essential that measures designed to tackle problem gambling do so in a manner that preserves these benefits. For example, measures need to preserve the entertainment value of machines for recreational gamblers to ensure future sustainability of the industry.

At a minimum the cost benefit analysis should use credible evidence to quantify the extent to which a measure will:

- reduce the harm associated with problem gambling
- affect recreational gamblers

• have an economic impact on the industry, governments and third-parties
• generate unintended or perverse consequences.

Where there is a gap in the available evidence, government should seek to address that gap by funding the relevant research. The industry’s preference is for research that involves trialling measures in live gambling environments in order to fully assess the real world impacts and monitor for the potential for unintended consequences.

Policies need to demonstrate that they will have significant net benefits over the ‘status quo’ in order to justify their implementation.

**Box 4: Guidelines for Best Practice Regulation**

**Principles for Best Practice Regulation**

1. Establishing a case for action before addressing a problem.
2. Considering a range of feasible policy options, including self-regulatory, co-regulatory and non-regulatory approaches, and their costs and benefits assessed.
3. Adopting the option that generates the greatest net benefit for the community.
4. In accordance with the Competition Principles Agreement, legislation should not restrict competition unless it can be demonstrated that:
   a. the benefits of the restrictions to the community as a whole outweigh the costs, and
   b. the objectives of the regulation can only be achieved by restricting competition.
5. Providing effective guidance to relevant regulators and regulated parties in order to ensure that the policy intent and expected compliance requirements of the regulation are clear.
6. Ensuring that regulation remains relevant and effective over time.
7. Consulting effectively with affected stakeholders at all stages of the regulatory cycle.
8. Government action should be effective and proportional to the issue being addressed.

**Regulatory Impact Assessment**

The COAG Guidelines for Best Practice Regulations require for all significant regulatory decisions that government conducts a rigorous regulatory impact assessment involving:

• risk analysis
• cost-benefit analysis
• assessment of business compliance costs
• assessment of competition effects.

Source: COAG Best Practice Regulation Guidelines, October 2007
Business Compliance Costs

The government needs to take into consideration the compliance burden imposed on the industry because of the introduction of new regulations. The additional compliance costs incurred by businesses are often wide ranging and have the potential to impact seriously on financial viability especially in the case of small businesses. Typically, compliance costs involve both an upfront implementation cost and recurrent operational costs.

Competition Effects

The government also needs to consider whether the proposed measures will have an impact upon competition, such as creating favourable conditions for a particular sector of the gambling industry at the expense of others. This is particularly concerning where regulations imposed on the local industry might create favourable conditions for offshore gambling websites that provide few benefits to the local economy.

Rather than measures that seek to prevent a minority of people from making bad choices by restricting consumer choice, the industry supports measures that empower our patrons to make informed choices, while offering targeted assistance to those unable to make rational choices. This includes providing relevant information on the chances of winning, the potential cost of playing, the risks involved with excessive gambling, and tips for gambling responsibly. In addition, providing optional tools for helping consumers manage their gambling expenditure, such as voluntary pre-commitment and self-exclusion, should be available should they choose to use them.

Review of Measures

Harm minimisation measures should be subject to a periodic review to ensure that they remain efficient and effective. Measures should be removed where they are no longer effective or more efficient means of reducing harm are available, in order to reduce the burden on industry and regulators.

The industry recommends a complete review of all existing harm minimisation measures of assessing whether the benefits outweigh the costs and the impact of those measures of the viability and sustainability of the industry.
There are no ‘silver bullet’ solutions for addressing problem gambling. Problem gambling is a complex issue involving a range of causal pathways\(^{15}\) (see Box 5) that requires a multi-faceted approach consisting of a suite of targeted, evidence-based measures that focus on prevention, early intervention and treatment.

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**Box 5: Pathways to Problem Gambling**

Problem gambling is a complex mental health issue influenced by a number of psychological, biological and social factors. Experts have identified a number of intricate causal pathways that may lead to problem gambling behaviours.

**Faulty Cognitions**

Faulty cognitions are a major contributor to the development of problem gambling behaviours. Players who hold misconceptions about how gambling products work and the chances of winning are at a higher risk of becoming a problem gambler. For example, many problem gamblers incorrectly believe that gaming machines pay in cycles and that after a long series of losses there is an increased probability of winning a jackpot. This leads to problem gamblers ‘chasing losses’ or remaining at a machine to avoid having another player win ‘their’ jackpot.

The industry recommends education and consumer information that dispels common misconceptions, as a means of addressing faulty cognitions in gamblers. If faulty cognitions are not addressed, other responsible gambling strategies such as pre-commitment are unlikely to be effective, as the gambler may view a pre-commitment limit as restricting his/her ability to win back previous losses.

**Escaping Comorbidities**

Problem gambling is also caused by people seeking a dissociative experience to escape from other pre-existing comorbidities such as depression and anxiety. The dissociative experience provided by gambling, often described as being in ‘the zone’, is utilised as a form of self-medication, in much the same way as an alcoholic will use the effects of alcohol in order to escape from underlying mental health issues or life problems. This group of problem gamblers are interested in maximising their time in ‘the zone’ and often gamble until all available funds are exhausted.

Without proper treatment for their underlying disorder, there is a significant risk that restricting their gambling behaviour will result in other self-destructive coping mechanisms such as alcohol or drug abuse. The preferred harm minimisation strategy for this group is early intervention and counselling to treat both the gambling problem and the underlying comorbidity.

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\(^{15}\) A pathways model of problem and pathological gambling (Blaszczynski & Nower 2002)
Neurological Disorders

Underlying neurological disorders that cause people to have impulse control difficulties also significantly increases the risk of a person becoming a problem gambler. This group of people usually exhibit a wide range of other behavioural problems independent of their gambling including substance abuse, suicidal tendencies and criminal behaviours. Specialist clinical treatment is required to manage their neurological disorders.

The industry supports providing healthcare professional and community service workers with information and screening tools to assist with the early identification of problem gamblers within their client base as a key strategy for assisting this group of individuals. In certain circumstances, it may be appropriate to provide the healthcare professional or a community service worker, such as a parole officer, with the capacity to issue an involuntary exclusion on behalf of the individual.

Avoiding ‘Silver Bullet’ Solutions

‘Silver bullet’ solutions consisting of a single measure or targeting only one particular form of gambling are unlikely to have a significant impact on reducing problem gambling and should be avoided.

Measures that only apply to a single form of gambling are fundamentally flawed. Problem gamblers on average engage in four different forms of gambling within a year and it is the combined effect of excessive gambling rather than a single type of gambling which causes harm. In fact, it is extremely rare for a problem gambler to engage exclusively in one form of gambling. For example, the most recent ACT prevalence study found that only 5.6% of problem gamblers utilised poker machines exclusively.16

As a result, by making one gambling product unattractive or highly restrictive for problem gamblers, the likelihood of substitution to another form of gambling, such as online casinos, remains high. The vast majority of the 3,000 online gambling sites are unregulated offshore sites that allow players to gamble on credit and do not offer any protection in the way of harm minimisation or responsible gambling measures. Measures that may have the unintended consequence of forcing players onto online casinos are likely to exacerbate problem gambling.

More importantly, ‘silver bullet’ solutions often attempt to address the symptoms rather than the cause of problem gambling. They provide no support for helping problem gamblers overcome the misconceptions that cause them to want to chase their losses in the first place. They fail to provide the necessary support needed to address the underlying comorbid disorders that drive many problem gamblers to gamble excessively.

The experience of Norway provides some important insights into the pitfalls of adopting harm minimisation strategies that target particular products (see Box 6).

16 Help-seeking and Uptake of Services Amongst People with Gambling Problems in the ACT, ANU 2011
Box 6: Targeting Slot Machines: The Evidence from Norway

In 2007, Norway implemented a ban on slot machines. In 2009, the Government reintroduced the machines with mandatory pre-commitment technology. A number of independent problem gambling prevalence studies occurred subsequent to the commencement of the reforms. SINTEF research conducted a prevalence study in 2008 and concluded:

We found no change in the proportion of people with gambling problems in 2008 compared to 2007 despite the fact that all slot machines were removed from the market. Most problematic gamblers in the current study were young men who had played slot machines the year prior to the ban, and a large proportion reported that Internet gambling was their most important form of gambling.

Synovate Research conducted a prevalence study one month prior to the slot machine ban in 2007 and found the problem gambling prevalence rate in Norway was 1.3% of the adult population. A subsequent study in 2010, following the introduction of slot machines with mandatory pre-commitment found that the problem gambling prevalence rate had risen to 2.1% of adult population, a statistically significant increase. The study also found that problem gamblers were increasingly gambling online.

The situation is reflected in the Norwegian Government’s gambling action plan:

Studies carried out since the slot machine ban indicate that many people currently have problems involving other gambling activities, especially in relation to gambling over the Internet offered by providers from outside Norway.

Compounding the problem was the fact that, despite the increase in the number of problem gamblers in the population, far fewer problem gamblers were seeking help through the Norwegian gambling helpline. This may reflect the fact that offshore online casinos do not provide information about local help services.


A Multi-faceted Approach

Prevention, Intervention and Treatment

Preventative measures such as school-based education programs, community awareness campaigns and improved consumer protection all contribute towards a reduction in the incidence of new problem gambling cases. They do so by developing protective factors, such as healthy cognitions about gambling among the target population.
Intervention strategies such as staff interventions, self-exclusions, or third-party interventions temporarily arrest the problematic behaviour in order to minimise the immediate harm to the gambler and facilitate the transference of the gambler into effective treatment programs.

Treatment options such as online, telephone or face-to-face counselling or self-help approaches such as Gamblers Anonymous are all designed to address the underlying issues causing the problem gambling behaviour.

**Targeted Solutions**

Solutions that target the affected population are inherently more cost-effective and minimise the risk of negative impacts on recreational gamblers or a reduction in community benefits. In contrast, blanket solutions that treat every patron as lacking the ability to gamble responsibly, waste resources and intensify the risk of unintended consequences.

**Strengthening the Safety Net**

The gaming industry remains committed to strengthening the existing safety net provided for our patrons. Offering a personal level of support to patrons through interactions with trained staff is a unique strength of the land-based gaming environment. In contrast, online gambling often occurs in complete social isolation, without proper supervision or regard for the player’s welfare.

**Supportive Gaming Environments**

To date the majority of harm minimisation and harm reduction measures have focused on physical aspects of the gambling environment without sufficient regard for the social and interpersonal aspects. Measures such as improved staff training, family interventions, access to welfare officers and the promotion of more social forms of gambling such as community-style gaming machines in which players either compete or play alongside one another in a social gaming experience represent an opportunity for improving the safety net.

**Community Engagement**

Greater community engagement can strengthen the safety net for problem gamblers. The most common place for problem gamblers to seek assistance is through family and friends. By raising awareness of the indicators of problem gambling, family and friends can be in a position to make an early intervention. In addition, providing healthcare and community service workers with the necessary information and tools to identify problem gambling, should lead to an increase in referrals to problem gambling treatment services.
RECOMMENDED MEASURES

The industry has identified a suite of measures for promoting harm minimisation and responsible gambling that represents a multi-faceted and cost effective approach to reducing problem gambling.

Action Area 1 – Prevention

Consumer Protection

1. Ban on All Forms of Credit Betting

Governments should consider the introduction of legislation to ban all forms of credit betting with the exception of VIP clients in casinos and licensed bookmaker account holders subject to due process. There is a clear difference, in terms of the risk of financial harm, between allowing a person to gamble using savings as opposed to gambling on credit, where losses can be much higher and attract interest payments.

Credit betting is particularly prevalent online. Online gambling facilitates easy access to gambling using credit cards and online operators are often willing to extend lines of credit to gamblers with little concern for their ability to repay the debt. Allowing credit betting goes against the fundamental principles of responsible gambling, both from the perspective of the individual and the operator.

Community partners required to implement this measure:

- Federal Government
- State Governments
- Industry
- Financial Institutions.

Actions Required:

- Consultation on implementation requirements
- Introduce legislation banning credit betting
- Phase-in process
- Compliance and enforcement monitoring.
2. Promote Informed Choice

Industry and government should work together to improve the information available to consumers in order to facilitate more informed decision-making with regard to gambling purchasing decisions. Where possible the information should be integrated into the product such as for gaming machines or online gambling websites. The information should include at a minimum:

- An explanation of how the game works
- An explanation of the ‘house edge’
- An explanation of cost of play and volatility
- A correction of common misconceptions.

Many behaviours that lead to problem gambling are symptomatic of a fundamental misunderstanding of how particular forms of gambling operate.

Disclosing information about how a product operates, the cost of play and dispelling common myths can promote informed choice and reduce the chances of problematic gambling behaviours such as ‘chasing losses’.

The website below is an example of the type of content that could be required on new poker machines, with similar content to be developed for wagering and sports betting websites and mobile phone apps.

http://www.nsgamingfoundation.org/pages/Videos.aspx

Community partners required to implement this measure:

- Gaming Technologies Association
- Industry Associations
- State Governments
- Gambling Researchers.

Actions Required:

- Research to develop appropriate message content
- Market test the content
- Trial Content
- Incorporate in all forms of gambling
- Evaluate effectiveness.
3. **Voluntary Pre-commitment**

Voluntary pre-commitment is a self-help tool whereby players can pre-set limits on their gambling expenditure and receive notification when they reach these limits. The effectiveness of voluntary pre-commitment lies in its ability to support patrons in making informed choices about their gambling expenditure.

The industry believes that with sufficient marketing and promotion efforts by venues, a venue-based voluntary pre-commitment can become a useful tool for encouraging recreational gamblers to set and adhere to limits to improve the management of their gambling expenditure.

Due to the very limited research on the effectiveness of pre-commitment measures in minimising harm, it is essential that implementation occurs in a cost-effective manner that does not draw resources from other proven strategies or place a significant burden on industry.

The industry supports the introduction of voluntary pre-commitment technology through the natural replacement cycle of gaming equipment. In addition, venues should have the flexibility to choose the type of technological solution that best suits their needs, whether that involves delivering voluntary pre-commitment through a machine-based solution or a systems-based solution.

**Community partners required to implement this measure:**

- Gaming Technologies Association
- Industry Associations
- State Governments
- Gambling Researchers.

**Actions Required:**

- Develop a functional specification
- Develop technical standards
- Design, produce and test new gaming machines and systems
- Approval
- Implementation over the natural product lifecycle.
Education and Awareness

4. School-based Education and Awareness Programs

The COAG Select Council on Gambling Reform should seek to develop and trial a nationally consistent school-based gambling education and awareness program that is integrated into the existing school curricula on personal health and financial literacy.

Youth are at increased risk of developing a gambling problem, a fact that is particularly concerning in light of the easy access to online gambling. Research has found that education programs can be an effective tool in preventing the development of problematic gambling behaviours. Awareness of the serious risks of excessive gambling coupled with knowledge of the odds associated with various gambling products acts as a protective factor against the development of gambling-related problems.17

An international panel of eminent gambling researchers recommended school-based education as a necessary requirement for any responsible gambling program.18 The content of the school-based education program could draw from the Productivity Commission recommendation 7.1:

- dispel common myths about gambling and educate people about how to gamble safely
- highlight potential future consequences associated with problem gambling, and
- make the community aware of behaviours indicative of problem gambling, to encourage earlier help-seeking or interventions by family and friends.

A trial and evaluation of school-based education programs would help to ensure program effectiveness and protect against the potential for unintended consequences.

Community partners required to implement this measure:

- State Governments
- School Communities
- Researchers.

Action Required:

- Research to develop content and materials for a national best practice model
- A trial and evaluation of the program in selected schools
- Production, distribution and implementation of programs.

18 Responsible Gambling: General Principles and Minimal Requirements, Journal of Gambling Studies, (Blaszczynski et al 2011)
5. National Advertising Campaign to Promote Responsible Gambling

Research has consistently shown the value of community education and awareness programs as a preventative measure. Experts consider such campaigns as a necessary requirement for a best practice responsible gambling program.\(^\text{19}\) The industry will support the development of a national campaign to promote a culture of responsible gambling among club staff and customers through its responsible gambling program. The program will augment existing community awareness campaigns that focus on problem gambling through a program that will:

- provide key strategies for gambling responsibly
- seek input from state governments, researchers and gambling counsellors
- deliver a cost-effective and targeted message via club websites, social media and in-venue materials.

**Community Partner required to deliver this:**

- Industry Associations
- Gambling Counsellors
- Researchers.

**Action required:**

- Develop a funding model for the campaign
- Develop content and campaign materials
- Distribute campaign materials.

\(^{19}\) Responsible Gambling: General Principles and Minimal Requirements, Journal of Gambling Studies, (Blaszczynski et al 2011)
Action Area 2 – Intervention

6. Staff Early Intervention Strategies

Where it does not currently exist, State Governments should work with industry and researchers to develop an advanced responsible gambling training program that includes a short list of commonly agreed indicators of problem gambling, to help venue staff identify and, where appropriate, respond to problematic player behaviours.

It is important to recognise that problem gambling is an issue which often involves significant psychological distress and that often requires the type of intervention that can only be offered in person. Staff interventions create an additional level of safety that is unique to land-based gaming operators and is lacking in the online environment.

Staff require the necessary training in identifying and responding to potentially problematic gambling behaviours. Such strategies require senior staff to have knowledge both of the indicators of problem gambling and appropriate strategies for responding to potential problematic behaviours in a manner that minimises the risk of exacerbating the problem or eliciting a negative response from the patron. This would involve staff approaching patrons displaying the signs of problematic gambling and starting a respectful conversation to enquire about the patrons welfare and where necessary offering them assistance such as self-exclusions or referral to appropriate help services. The approach is similar to the responsible service of alcohol programs that are currently in place in licensed venues across Australia.

Community partners required to implement this measure:

- Industry Associations
- Registered Training Organisations
- Australian Skills Quality Authority
- State Governments.

Actions Required:

- Research appropriate identification intervention strategies
- Develop training material
- Trial programs
- Develop legislation
- Phase in training (3 – 5 years)
- Evaluate effectiveness.

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20 Identifying Problem Gamblers in Gambling Venues: Final Report, Gambling Research Australia
7. Family Interventions

The COAG Select Council on Gambling Reform should re-visit establishing a consistent policy on facilitating family interventions taking into account the latest research and insights gained from existing third party exclusion programs.

Problem gambling can have a profound effect not only on the gambler but also on their family particularly where children are involved. Family members often have a better capacity to observe problems than other parties such as venue staff and therefore are in a good position to intervene before problems progress to a crisis point. Family members should have the capacity to initiate a third party intervention on behalf of a problem gambler. Venues should be required to promote the availability of family interventions both through in-venue advertising and where applicable online through company websites.

From the industry perspective, a tiered approach to family interventions would appear to be the most appropriate implementation. This would involve a role for both venue operators and state and territory governments. Venues would be obligated to respond to a request for an intervention on behalf of a family member. Recognising at this stage the complaint is merely an allegation that the person has a gambling problem, venues should be required to:

- observe the gambling behaviour of the individual in question
- as appropriate, engage in a respectful conservation with the alleged problem gambler and offer assistance
- maintain the anonymity of the complainant
- provide the family member with an information pack outlining their options and advice for supporting the problem gambler’s recovery.

Where the patron denies the assistance offered venue intervention, a second tier process involving a government agency can examine the allegation and where established issues appropriate orders such as involuntary exclusions or mandatory counselling.

Community partners required to implement this measure:

- State Governments
- Families
- Venues.

Actions Required:

- Trial program and evaluate benefits
- Assess the feasibility of expanding the program nationally
- Advertise the availability of the scheme.
8. Development of a Screening Kit for Professionals

A whole-of-community response to the issue of problem gambling requires the engagement of a range of healthcare and community services to improve the support network available to problem gamblers and those at risk of becoming problem gamblers.\(^{21}\)

The COAG Select Council on Gambling Reform should consider supporting the development of a nationally consistent problem gambling awareness and screening kit for distribution to all appropriate healthcare and community service providers to assist with the early identification and treatment of problem gambling:

- ensuring that health professionals and community services have information about problem gambling and referral pathways
- providing a one-item screening test, as part of other mental health diagnostics, for optional use by health professionals and counsellors
- screening should be targeted at high-risk groups, particularly those presenting with anxiety, depression, high drug and alcohol use
- providing dedicated funding to gambling help services to facilitate formal partnerships with mental health, alcohol and drugs, financial and family services
- promote self-help and brief treatment options such as self-help manuals, gambling budget calculators and online counselling, as such interventions can be cost-effective ways of achieving self-recovery of people experiencing problems with gambling.

Community partners required to implement this measure:

- Healthcare Professionals
- Community Service Workers
- Centrelink.

Actions Required:

- Develop a one item screening test
- Develop a problem gambling awareness kit
- Trial Program and Refine
- National Roll-out.

\(^{21}\) Help-seeking and Uptake of Services Amongst People with Gambling Problems in the ACT, ANU 2011
9. Improved Self Exclusion Programs

Self exclusion has been proven to be a valuable tool of recovery for those with a gambling problem, especially when used in conjunction with other vital aids such as face-to-face counselling. Self-exclusion operates by self-identified problem gamblers voluntarily surrendering the right to enter the gaming areas of the venues in their area. This helps them overcome their impulsive urges to gamble. A two-year study by Macquarie University found more than 70% of participants in self-exclusion reported significant reductions in the money spent on gambling as a result of participating in the program.22

There are a number of ways in which existing self-exclusion schemes can be improved upon. ClubsNSW has recently commenced rolling out a multi-venue self-exclusion scheme, which allows patrons to exclude themselves from multiple clubs in their local area through a single application.

The application can take place either through the venue or alternately through a gambling counsellor to help reduce the embarrassment associated with going to each venue to request a self exclusion. A similar multi-venue approach is already operational across clubs and hotels in Victoria.

The industry recommends introducing a requirement that venues do not allow self-excluded problem gamblers to re-enter the venue until their counsellor has formally released them. This will assist and empower counsellors with those who are at risk of recidivism and ensure venues know that a member is reformed upon his/her return.

Community partners required to implement this measure:

- State Governments
- Gambling Counsellors
- Venues.

Actions Required:

- Trial program and evaluate benefits
- Assess the feasibility of expanding the program nationally
- Advertise the availability of the scheme.

10. Improved Promotion of Treatment Options

There are currently a wide range of treatment options available free of charge to problem gamblers and their families. These include face-to-face, email and online chat counselling along with a range of self-help tools such as free SMS reminder messaging service, online gambling calculators and self-help manuals. Research indicates recovery rates of 90 percent for those gamblers who seek treatment. This underscores the importance of effectively promoting treatment services.

However, many gamblers and their families are unaware of the free assistance available particularly the online services. These online services, due to their anonymity often act as a crucial stepping stone to face-to-face counselling. It is important that these services are more actively promoted to gamblers and their families.

As soon as practicable industry codes of practice should be updated requiring all gambling operators to ensure that links to online gambling help services are provided in a prominent place on their websites. In addition, all stakeholders including Government, industry and community groups should regularly advertise gambling help services through their social media feeds (e.g. Facebook and Twitter).

Community partners required to implement this measure:

- Community Groups
- Governments
- Gambling Operators.

Actions Required:

- Trial program and evaluate benefits
- Assess the feasibility of expanding the program nationally
- Advertise the availability of the scheme.

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11. National Gambling Research Program

There is a multitude of ad hoc gambling research studies conducted throughout Australia. While the majority of studies conducted no doubt have some merit, they often lack scientific rigour and/or impartiality and are not subject to peer-review. There are often conflicting findings among research reports making it difficult for decision-makers to discern what evidence is credible. Moreover, much of the research is aimed at gaining publication in academic journals and lacks relevance to contemporary gambling policy. Where research has been initiated by governments it has typically involved a protracted process, taking several years to commission and complete the research, further inhibiting the development of evidence-based policy.

The industry supports the development of a national gambling research program aimed to ensure that all government funded research into gambling is consistent with best practice research standards, has direct relevance to policy-making and is completed in a timely manner.

While recognising that responsibility to commission research and develop gambling policy remains the responsibility of individual state and territory governments, a coordinated national approach would prevent the duplication of research across jurisdictions and facilitate national surveys and evaluations where appropriate. State and territory governments should consider establishing a gambling research advisory board with responsibility for the development and oversight of the national research program. The advisory board should:

- have representation from both the industry and the state and territory government agencies responsible for regulating gambling
- be responsible for setting the research agenda and establishing funding priorities
- establish guidelines, methodologies and processes for government funded research
- where appropriate, coordinate evaluations, surveys and reviews on a national basis
- maintain a nationally consistent data set on gambling and problem gambling
- review the quality and usefulness of research with respect to developing gambling policy
- disseminate concise summaries of research that is both valid and policy relevant to all stakeholders.

In addition, each state and territory government should consider establishing a dedicated gambling research centre. The research centres would provide state and territory governments with a means to expedite access to research in order to better inform gambling policy development. The preference for state and territory based research centres reflects the fact that most gambling policy issues are jurisdictionally specific and require the guidance and expertise of the local regulatory agency. A further advantage of having multiple research centres is that it promotes a diversity of expert opinions and provides an excellent source for peer-review.
Community partners required to implement this measure:

- Gambling Researchers
- State Governments
- Industry Associations.

Actions Required:

- Stakeholder consultation to:
  - Establish resourcing requirements
  - Establish a funding model
  - Identify suitable advisory board candidates
  - Establish research priorities.
Other Industry Initiatives

The following measures represent initiatives that the industry intends to undertake without the necessity for government support. They form an integral part of the industry’s commitment to providing the best level of care and service to our staff and patrons.

1. Venue Chaplaincy Programs

It is widely recognised that problem gambling is often symptomatic of underlying mental health issues and other life problems. Recent studies show that problem gamblers are more likely to seek help for their comorbid disorders than they are for their gambling problems. It is therefore important that any program designed to reduce the rate of problem gambling has services oriented towards tackling the underlying issues that are the cause of problem gambling.

ClubsNSW is in the process of initiating a trial of club chaplaincy programs in conjunction with the Salvation Army. The program would see Salvation Army officers available at regular intervals in clubs to discuss a wide range of issues with patrons including those issues that are often the cause of problem gambling such as depression, anxiety, divorce or bereavement. Chaplains will screen patrons for problem gambling and advise them of specific gambling treatment options.

Contingent on the result of the trial, the program should be expanded such that there is a dedicated chaplain or welfare officer in each local government area (LGA) who routinely visits the gambling venues in that area. Some larger venues may wish to have dedicated counsellors stationed on site.

Community partners required to implement this measure:

- Venues

Actions Required:

- Trial program and evaluate benefits
- Assess the feasibility of expanding the program
- Provide Problem Gambling Awareness Training to chaplains
- Phase in program over the next 3–5 years.

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24 Help-seeking and Uptake of Services Amongst People with Gambling Problems in the ACT, ANU 2011
2. **Consumer Narrative Problem Gambling Advocacy and Awareness Program**

State governments in partnership with industry and community groups should commit to funding the development of problem gambling advocacy and awareness programs based on the consumer narrative model utilised in the ‘Consumer Voice’ program operating in South Australia. The program has received widespread acclaim among gambling academics, counsellors, government agencies and industry bodies alike as one of the most effective tools for raising awareness, de-stigmatising problem gambling and de-mystifying the treatment and recovery process.25

The ‘Consumer Voice’ project is a problem gambling advocacy program co-ordinated by Relationships Australia in SA. Club Safe in South Australia (a Recognised Industry Body by the South Australian Government) regularly engages ‘Consumer Voice’ Speakers in their Responsible Gambling awareness/training sessions with Clubs.

The ‘Consumer Voice’ project is fully funded through the Gamblers Rehabilitation Fund, a joint initiative between the AHA(SA), Clubs SA, the Adelaide Casino and the Government of South Australia. The program involves training former problem gamblers to relate their personal narratives at public speaking events with a wide variety of audiences including:

- Gambling help service sector
- Hospitality workers, gaming venues
- Community agencies
- Counselling sessions of people affected by problem gambling
- Other interested community members.

**Community partners required to deliver this measure:**

- Industry Associations
- Welfare Groups
- Former Problem Gamblers.

**Actions Required:**

- Develop a partnerships with welfare organisations
- Develop business model and procedures
- Develop training content
- Recruit potential Consumer Voice Speakers
- Train speakers
- Trial program.

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## Appendix A: Problem Gambling Prevalence Rates

### Table 1: International Problem Gambling Prevalence Rates

<table>
<thead>
<tr>
<th>Country / State / Province</th>
<th>Year</th>
<th>Prevalence Rate (CPGI 8+)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern Ireland</td>
<td>2010</td>
<td>2.20%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/Prevalence_Northern_Ireland.cfm">Link</a></td>
</tr>
<tr>
<td>Norway</td>
<td>2010</td>
<td>2.10%</td>
<td>Synovate Research 2010</td>
</tr>
<tr>
<td>Manitoba</td>
<td>2006</td>
<td>1.40%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_manitoba.cfm">Link</a></td>
</tr>
<tr>
<td>Alberta</td>
<td>2001</td>
<td>1.30%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_alberta.cfm">Link</a></td>
</tr>
<tr>
<td>New Brunswick</td>
<td>2009</td>
<td>1.30%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_new_brunswick.cfm">Link</a></td>
</tr>
<tr>
<td>Saskatchewan</td>
<td>2001</td>
<td>1.20%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_saskatchewan.cfm">Link</a></td>
</tr>
<tr>
<td>British Columbia</td>
<td>2007</td>
<td>0.90%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_british_columbia.cfm">Link</a></td>
</tr>
<tr>
<td>Nova Scotia</td>
<td>2007</td>
<td>0.90%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_nova_scotia.cfm">Link</a></td>
</tr>
<tr>
<td>Prince Edward Island</td>
<td>2005</td>
<td>0.90%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_prince_edward_island.cfm">Link</a></td>
</tr>
<tr>
<td>Canada</td>
<td>2007</td>
<td>0.80%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada.cfm">Link</a></td>
</tr>
<tr>
<td>Ontario</td>
<td>2005</td>
<td>0.80%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_ontario.cfm">Link</a></td>
</tr>
<tr>
<td>Great Britain</td>
<td>2010</td>
<td>0.70%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/Prevalence_Great_Britain.cfm">Link</a></td>
</tr>
<tr>
<td>Newfoundland &amp; Labrador</td>
<td>2009</td>
<td>0.70%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/prevalence_canada_newfoundland.cfm">Link</a></td>
</tr>
<tr>
<td>Northern Territory</td>
<td>2005</td>
<td>0.64%</td>
<td>Charles Darwin University (2006), An Overview of Gambling in the Northern Territory</td>
</tr>
<tr>
<td>Tasmania</td>
<td>2008</td>
<td>0.54%</td>
<td>South Australian Centre for Economic Studies (2008) Social and Economic Impact Study into Gambling in Tasmania</td>
</tr>
<tr>
<td>Australian Capital Territory</td>
<td>2009</td>
<td>0.50%</td>
<td>Australian National University (2010), 2009 Survey of the Nature and Extent of Gambling and Problem in the ACT</td>
</tr>
<tr>
<td>Australia</td>
<td>2011</td>
<td>0.49%</td>
<td>Institute of Public Affairs (2011), Gambling away perspective? A review of the evidence justifying electronic gaming regulations</td>
</tr>
<tr>
<td>South Australia</td>
<td>2005</td>
<td>0.43%</td>
<td>South Australian Department for Families and Communities (2006) Gambling Prevalence in South Australia: October to December</td>
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<tr>
<td>New Zealand</td>
<td>2007</td>
<td>0.40%</td>
<td><a href="http://www.abgaminginstitute.ualberta.ca/Prevalence_New_Zealand.cfm">Link</a></td>
</tr>
<tr>
<td>New South Wales</td>
<td>2009</td>
<td>0.40%</td>
<td>NSW Health (2010), NSW Population Health Survey 2008-2009, NSW Office of Liquor Gaming and Racing</td>
</tr>
<tr>
<td>Iceland</td>
<td>2007</td>
<td>0.30%</td>
<td>SNUS 2009, Gambling and problem gambling studies among Nordic adults</td>
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</table>