



**February 2009**

## The Alliance: who are we and what are we going to do?

The Alliance comprises members from around the world who are working together to eliminate gambling harm. The core group of ten is currently supported by a committee of advisors.

The aim of the Alliance is to develop and promote policies, programmes and strategies that are effective in reducing gambling harm internationally. This will be achieved by activities based on and including:

- The exchange of information amongst alliance members and their associated networks relating to gambling harm, its prevention and treatment
- To provide mutual support to members as well as individuals and other organizations promoting gambling harm reduction strategies
- To monitor the development of products and methodologies and assess their efficacy
- To collectively advocate for improved nationally and internationally regulatory frameworks and community understanding
- To develop and share effective public health strategies
- Influencing research and developments as an approach

### Shaping the Next Gambling Harm Response Card Based Pre-Commitment

While there is no single measure that will dramatically reduce problem gambling, once governments legislate to allow gambling to proliferate, I suggest that strategies to assist with pre-commitment are currently the responses with the likelihood of making the greatest difference. This article starts to explore the question of what 'best practice approaches' to pre-commitment strategies might look like. This question is asked with the understanding that various jurisdictions around the world are considering pre-commitment of some sort. I present a discussion starter rather than a firm proposal and eagerly seek feedback and comment.

The term 'pre-commitment' has many interpretations, and here is a public policy dilemma. Those with a laissez-fair approach regard pre-commitment by a gambler as a responsibility of the gambler, so any person who gambles is making an informed choice. This approach is not helpful to reducing gambling harm and seeks to put all responsibility on the individual, a 'buyer beware' approach to consumer protection.

I am using the term "pre-commitment" to mean a process that proactively encourages gamblers to commit to personal gambling spending and time limits prior to gambling and then utilises technologies and patron interaction, in gambling venues, to assist in adhering to these limits. While there are various technologies

that can assist, most attention has been on 'smart card' technologies, where each individual has a card that is able to store data. This is the technology that is 'in mind' for the following thoughts. One of the options for a card based pre-commitment system is to operate it within an existing loyalty card platform.

Some States / Provinces have already done some thinking about the notion of pre-commitment, including using card-based systems. I'm certainly aware that there are current developments in:

- Nova Scotia in Canada: where there has been a trial of a voluntary card-based system.
- Saskatchewan in Canada: has conducted similar trials
- Queensland: where has been a detailed trial of a card based system in one venue.
- Victoria.: The Victorian Government has stated that by 2012 there is going to be a pre commitment strategy in place. A policy capability is being developed for release mid 2009. The technical capability will then be developed, focusing on a machine based, rather than card based technology
- South Australia: where a Responsible Gambling Working Party has been established and is reporting to the Minister. A trial has recently commenced using an industry based loyalty card platform to offer pre-commitment options to patrons. Another couple of trials are also possible, using similar technologies.

These trials and developments are being watched closely by regulators from around the world as well as by industry and

gambling help groups. Since early approaches are invariably very influential in what eventually becomes mainstreamed, I am certain that those of us with an interest in reducing harm need to be active in seeking to influence early developments to give ourselves strong chances of achieving the best approach.

The following lists some initial ideas about the elements that might be included in the best approach for aspects of card based pre-commitment strategies, I consider:

1. Capability
2. Responses to Customer reaching a limit, while gambling
3. Data
4. Technology

#### **Toward Best Approach – Capability**

For individual gamblers with a card to enable pre-commitment, I suggest that the following elements are essential:

- Default limits need to be set on a per session and per week basis, for both money spent and time spent limits. This is the absolute minimum capability
- Wide choice of additional personal limit options
- Minimum 24 hour notice to increase limits, but immediate change for reducing limits
- Universal – one card applies to any machine / venue
- Not transferable from one person to another
- Hard to replace, ideally with a biological identification system, eg thumbprint
- Personal account statement posted monthly, available electronically and in paper copy
- Client data confidentiality systems in place
- Voluntary. This is controversial, in that the ideal system would be mandatory for all gamblers, however I suggest that if gamblers, governments and the industry understand approaches to be voluntary, there is likely to be a stronger take up. This is well worth further debate.

#### **Toward Best Approach - Limit Reached**

Assuming a system that has a 'smart' card recording a gambling activity in real time, what should happen when a limit is reached?

- Minimum set of notification options
  - On machine display
  - Cashier / authorised venue employee notification
  - Documented in Activity Statement
  - No further loyalty benefits accrue, if system is linked to a loyalty scheme
- Customers need to be given choices about notification options, when they set their limits, options offered should include
  - Text Alert to Mobile phone
  - 3rd party notification (partner, trusted friend, help service?)
  - Call to mobile phone
  - Audible machine sound
- Personal approach
  - Persons who exceed a limit should be approached, by a venue staff member, within 15 minutes of a limit being exceeded
  - On the third occurrence of a limit being exceeded (and any subsequent time) a venue staff member will approach the patron and ensure that they are aware of local gambling help services
  - A protocol for approach will be developed by

gambling venues and local gambling help services

#### **Toward Best Approach – Data**

Card based systems that include pre-commitment will enable a vast amount of data to be gathered. It is crucial that this occurs within the bounds of privacy principles for individuals. It is also crucial that all depersonalised data is available to community and academic interests, as well as government and industry. Stakeholder data reference and analysis groups will be necessary in each jurisdiction to enable public policy to be informed by the data. This area needs more thinking, but as a start, I suggest the following baselines for data management and disclosure, for any jurisdiction with a pre-commitment program

- All individuals to have ready access to data collected about their gambling and related activities
- Data collection standard established
- Quarterly data return to a regulator
- Data management group including venues, community, researchers, government, for each jurisdiction
- Annual public reporting of minimum agreed, aggregated data set
- Privacy practice must be adhered to

#### **Toward Best Approach – Technology**

It is clear that just about anything imaginable is now achievable from a technological perspective; cost and who pays are the only questions. Criteria for appropriate technology include:

- Easy to use
- All displays and instructions easy to read
- Discrete
- Cost effective
- National, or even international compatibility of systems

These thoughts are intended to start thinking and debate. I also suggest some next steps:

1. A "Best Approaches to Gambling Pre-Commitment" document should be developed for further consideration by all parties. Perhaps the Alliance can take the lead on this
2. Series of National (or at least semi-national), stakeholder roundtables could be established to develop best approach standards, potentially run as part of international conferences (Starting places could include New Zealand, Australia, Canada, Scandinavia)
3. "Clearing House" function for known trials to be developed, again this is a role that the Alliance could play
4. Insistence that independent evaluation of all trials be undertaken with public release of these evaluations.

I'd love to hear from anyone with thoughts about any of the issues I've raise in this short and broad sweep of an emerging debate.

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## **ARE YOU USING IT??**

The Alliance website is at:

<http://www.gaphai.org/>

Please make sure you visit it in between meetings and add information. So we keep it alive.

Please contact Alison if you can't remember your password. [alison.hickey @ pgfnz.org.nz](mailto:alison.hickey@pgfnz.org.nz)

## The New Zealand Ministry of Health Strategy for Minimising Gambling Harm 2010-2013

Under the NZ Gambling Act the Ministry is required to produce a comprehensive service plan on Preventing and Minimising Gambling Harm every three years. This plan has to include an assessment of needs and a service plan which address, public health and treatment initiatives and a research program. The costs of implementing this plan are calculated, and this forms the basis for setting a levy on gambling losses in NZ. Fundamental to the levy formula is an assumption that gambling modes that generate more harm contribute more financially to the strategy.

The service plan is developed in consultation with all stakeholders in gambling and submitted to the Gambling Commission who also consult on it. Once the commission has deliberated and decided on the scope of the plan the budget is set and used in the calculation of the levy. The final step is approval by Cabinet. The Ministry has currently received submissions on the last plan and has completed a needs assessment for gambling. This report will be released for consultation at the end of February. A new plan will be developed and the Ministry have indicated that they expect this to be available for public discussion in July this year. This will go to the Gambling Commission towards the end of this year, and Cabinet early in 2010 for implementation in July 2010.

This process involves engaging the disparate parties involved in gambling and consequently focuses conflict between these parties. The Gambling Industry tends to want as lower a levy as possible while researchers and providers of public health and treatment want it set as high as possible. A covert goal may be the industry regarding this process as a way of having some control over the activities or even existence of the public health treatment and research providers. In turn these groups see the levy round as an opportunity to highlight the harms caused by gambling and by working towards full recovery of these costs to expose the viability of the gambling industry.

All indications from the Ministry are that the first two plans, that is 04-07 and 07-10, were based on existing services and were an opportunity to build capacity and integrate gambling services into the general mental health approaches used in NZ. The next plan may be grander and more radical in its approach and thus has the potential to expose factions in the whole process to more risk and possibly more benefits. In turn this is expected to add fuel to the conflicts that normally accompany this process.

In short, the 2010-2013 levy round is well and truly upon us and we can expect the next 6 months to be tumultuous for all gambling stakeholders (including the Ministry) in NZ and it's likely that the Problem Gambling Foundation and other providers will need the support of similar groups around the world over this period.

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Rearrange the letters: SLOT MACHINES.  
Answer: CASH LOST IN EM.



*"That's just my luck. We've got food and water, but no money. Being stranded on this island is really going to suck now."*

### Conferences for 2009

**March 9 -12 2009. Third Triennial Aboriginal Policy Research Conference.** Ottawa, Ontario, Canada. URL: <http://www.aprc-crmpa.ca/>

**March 26 - 28, 2009 . Banff Conference on Internet Gambling.** The Banff Centre, Banff, Alberta, Canada URL: [http://whhttp://www.abgaminginstitute.ualberta.ca/2009\\_conference.cfm](http://whhttp://www.abgaminginstitute.ualberta.ca/2009_conference.cfm)

**April 19 -April 22.** Responsible Gambling Council in Niagara Falls, Canada at the Sheraton Fallsview Hotel and Conference Centre for *Discovery 2009*. URL: <http://www.responsiblegambling.org/en/programs/events-upcoming.cfm>

**12 May 2009.** 2009 Mass Conference on Gambling Problems College of Holy Cross, Worcester Massachusetts USA [www.masscouncilregistration.org/](http://www.masscouncilregistration.org/)

**19 - 20 May 2009** NZ Gambling Conference 2009. Department of Internal Affairs Wellington. URL <http://gamblingconference2009.dia.govt.nz>.

**May 25th - 29th, 2009** at Harrah's Lake Tahoe. 14th International Conference on Gambling and Risk taking URL: [http://www.unr.edu/gaming/14th\\_Conference\\_Brochure.pdf](http://www.unr.edu/gaming/14th_Conference_Brochure.pdf)

**25 - 27 June 2009.** 23rd National Conference on Problem Gambling Prevention, Treatment, Responsible Gaming, Research and Recovery Indianapolis, Indiana USA [www.ncpgambling.org/](http://www.ncpgambling.org/)

**November** National Association for Gambling Studies Australia (NAGS) Conference <http://www.nags.org.au/>

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