

Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House
Canberra ACT 2600, Australia
Email: gamblingreform@aph.gov.au

31st March, 2012

Dear Joint Select Committee on Gambling Reform,

RE: Inquiry into the prevention and treatment of problem gambling

Please find attached my response to the Joint Select Committee on Gambling Reform's inquiry into the prevention and treatment of problem gambling. I would like to commend the ongoing interest and efforts of the Committee in gaining a greater understanding of the impact of gambling and problem gambling in Australia. It is essential that policy be based as far as possible on empirical evidence to ensure that efforts and resources have the intended effects and maximal impact. Gambling and problem gambling are difficult areas to regulate given that the vast majority of Australians engage in gambling with few negative consequences and the gambling industry makes many positive contributions to society, particularly in terms of employment, tourism, and in some instances contribution to the community. However, for a substantial minority of gamblers there are significant negative consequences and harms related to gambling that impact individual as well as their families, friends and wider communities. Consequentially, the Government and industry operators must take efforts to minimise the potential harms associated with gambling including products, marketing and venues.

The views contained in this submission are my own and do not reflect the views of Southern Cross University or the Centre for Gambling Education and Research. My submission is based on evidence and my experience, background knowledge and research in the gambling field. I welcome the opportunity to discuss this submission, my research and other matters relating to this review with the Committee as well as other stakeholders and interested parties.

I look forward to hearing the outcome of the present review.
Sincerely,

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Southern Cross University

For information regarding this submission please contact:

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Executive Summary

Responsible gambling messages

- Empirical evidence supports the effectiveness of dynamic warnings in the form of pop-up messages for electronic gaming machines to increase awareness and recall of messages and impact of message content.
- Static warnings appear to have minimal impact on gambling thoughts or behaviour and are not noticed by majority of players.
- Warning messages should encourage players to reflect on their own behaviour and consider appropriate actions, such as taking a break in play.
- Research is needed to indicate appropriate placement, frequency and duration of dynamic warnings and evaluate effectiveness of warnings following implementation.

Responsible gambling strategies for Internet gambling

- Responsible gambling features for Internet gambling should include age verification, provision of information with links to resources, limits on time and money, self-tests with normative feedback on gambling, pop-up messages, and tailored interventions based on gambling patterns.

Advertising of Gambling Products (including Wagering)

- The advertising of gambling and its integration within sports commentaries ought to be restricted and that appropriate guidelines be established.
- The involvement of Internet gambling sites in the sponsorship of sporting teams and events should be carefully considered and regulated to reduce any risks of exposure to vulnerable population.

Self-help and brief treatment options

- The implementation of relatively simple Internet interventions, such as brief assessments with automated normative feedback, may be particularly useful for gamblers who would not otherwise seek formal treatment or help.

Commonwealth, state and industry funding for gambling research

- Gambling and problem gambling should be specifically listed as a national research priority and granting bodies should be encouraged to fund gambling research.
- Stakeholders should be encouraged to actively collaborate with academic researchers.

Use and display of responsible gambling messages

In an effort to reduce harm, policy decision-makers recommend legislating for the mandatory display of signs on electronic gaming machines (EGMs) designed to inform players about probabilities and to warn of potential addictive qualities (Productivity Commission, 2010). The rationale is predicated on the purported effectiveness of signs found in other public health lifestyle domains, for example, smoking and alcohol consumption, despite minimal evidence demonstrating the effectiveness of such campaigns in modifying drinking or smoking behaviours (Monaghan & Blaszczynski, 2010a). Warning signs are important in protecting consumer freedom and enabling individuals to use potentially risky products in a safe manner while minimizing risks of harm. However, with respect to gambling, and consistent with the substance use field, available evidence suggests that the majority of community members are aware of problem gambling issues and notice signs displayed in venues (Rodda & Cowie, 2005). In a study of NSW Clubs, Hing (2003) found 86% of 954 gamblers were aware of risks related to gambling, although fewer (67%) reported noticing signs displayed in the venue. Although community members may be aware of and notice signs, there is minimal data describing the extent to which the information shown is retained in memory and its effects on gambling on thoughts or behaviour (Monaghan, 2008; Monaghan & Blaszczynski, 2010a).

Several research trials have been completed investigating the impact and effectiveness of dynamic warnings on EGMs as compared to the mandated static messages on EGMs in NSW. This research includes:

1. A trial with regular gamblers recruited from a university population who played actual EGMs (without money) which had been modified to show either a dynamic message scrolling across screens during play without disrupting play or a static message on the side of the screen. Messages either provided information on the chances of winning the major prize, or attempted to correct common irrational thoughts about winning (Monaghan & Blaszczynski, 2007).
2. A trial with regular gamblers recruited from a university population who played simulated EGMs in a laboratory setting. Participants were shown either a pop-up message shown on screens during a short (15 second) break in play or a static message on the side of the screen. Messages attempted to educate players on how machines work or encouraged participants to consider their current gambling and whether they should take a break (Monaghan & Blaszczynski, 2010a).
3. A trial with regular gamblers recruited from gambling venues who played simulated EGMs in a gambling venue. The trial conditions were identical to those described in the point immediately above (Monaghan & Blaszczynski, 2010a).

Across all trials *static warning signs were shown to be generally ineffective in facilitating responsible gambling* as they were not attended to, the content of warnings were not recalled and static warnings had no significant impact on thoughts or behaviour related to gambling. This confirms previous research on static warning signs (e.g., Hing, 2003).

In contrast, *dynamic warning signs had a significant impact on play*. The research supported the effectiveness of dynamic warning signs in *attracting attention and communicating information* as compared to static signs. In all trials participants were able to recall seeing dynamic warnings and were more accurate in their recall of the content of warnings. This recall was still more accurate for pop-up than static signs two weeks following exposure to warning signs. Dynamic warning signs also had a *significant impact on thoughts and behaviour during and following gambling sessions*. In particular, pop-up signs appeared to facilitate responsible gambling behaviour by reducing session length, causing greater likelihood of taking breaks, and greater awareness of time and money spent. Importantly, dynamic warnings were not considered overly disruptive by the vast majority of gamblers. Furthermore, some feedback from the minority of players who did find the messages disruptive indicated that this was a positive result as the dynamic warning *broke the dissociation that can occur during EGM play*.

Importantly, as it relates to the current proposed reforms, the *content of warning messages also had a significant impact on gambling and facilitated responsible gambling*. Warning signs that encouraged self-appraisal of one's own gambling behaviour and whether they should take a break (e.g., Do you know how much you have spent? Do you need to take a break?) were significantly more effective than signs containing information about how outcomes are determined. Self-appraisal messages facilitated responsible gambling by increasing participant's awareness of time and money spent and increased the likelihood of taking breaks during play and having shorter sessions. These findings were maintained over time as participants indicated that the self-appraisal messages had influenced their awareness of time, length of sessions and likelihood of taking a break during subsequent sessions of EGM play. Importantly, problem gamblers were significantly more likely than non-problem gamblers to indicate that the pop-up signs would influence the number of breaks taken during a session of play indicating that this simple harm minimisation initiative would be effective at facilitating responsible gambling amongst problem gamblers.

Evidence indicates that *warning signs that provide information about risks and the potential for harm* or provide information about how a product works (for example, the odds of winning) *are generally ineffective* in modifying thoughts or behaviours. This is based on research from the

gambling field, as well as from other public health domains including alcohol and tobacco consumption. A published review of the most appropriate content of warning messages for gambling concluded that signs designed to encourage players to reflect on, appraise, evaluate and self-regulate their actions have greater theoretical and empirical support (Monaghan & Blaszczynski, 2010b). It is recommended that this review (Monaghan & Blaszczynski, 2010b) be carefully reviewed and *consultation undertaken with relevant experts to inform the development of the content of dynamic warnings* mandated for display on EGMs.

Based on the available empirical evidence, the implementation of dynamic warnings for EGMs appears to be a sound responsible gambling strategy. However, attention must be carefully paid to the content of warnings to ensure that they have the desired impact, which is, facilitating responsible gambling. As there is little research on the most appropriate form, frequency and position of warnings it is recommend that further research be commissioned to investigate these display options. Finally, it is essential that *the impact of dynamic warnings by monitored and evaluated* to ensure that the reform is effective in reducing gambling-related harms.

Responsible gambling strategies for Internet gambling

Due to the newness of the Internet gambling phenomenon, there is little historic precedent on which regulators can base policies, and there is certainly no “gold standard” or proven effective policy which has been implemented internationally (Gainsbury & Wood, 2011). Despite the association with gambling problems, *Internet gambling sites also have the potential to provide a responsible environment*. Regulation should mandate strict standards for probity and harm-minimization, including prominently displayed account information, tools to enable pre-commitment to time and monetary expenditure, automated notifications and warnings regarding potentially risky behaviour and the ability to self-exclude. Other responsible gambling features include age verification checks linked to a jurisdictional registry, restricted use of credit betting, provision of information about problem gambling, screening tools, and links to appropriate resources for help (Monaghan, 2009). There is evidence to support the effectiveness of responsible gambling tools for online play including pop-up messages, time and money limits, and self-exclusion (Hayer & Meyer, 2011; Monaghan, 2009; Wohl & Pellizzari, 2011). Evidence also indicates that the majority of Internet gamblers support the availability of responsible gambling tools, particularly those that assist customers to play within their means such as player feedback and regular financial statements (Gainsbury et al., unpublished manuscript).

The information collected by Internet gambling sites in relation to unique customer accounts (player account data) provides valuable opportunities to interact with players at a personal level

to encourage responsible gambling (Gainsbury, 2011). Behavioural data and interactions with customers can be used by online gambling operators to detect potentially risky play and allow operators to provide appropriate interventions and tools to help customers play within their means. Research is needed to further the understanding of how player account data can be used to create a more responsible gambling environment. Such research requires funding and collaboration with industry and government to provide access to appropriate de-identified data. Such research could be used by the operators to increase the effectiveness of player protection and responsible gambling strategies and subsequently protect players from harm. Similar studies have been conducted internationally and *online gambling operators are encouraged to engage in such collaborative efforts to increase player protection standards and reduce the risks associated with Internet gambling.*

As online gamblers may hold multiple accounts with a variety of operators, responsible gambling systems may be made much more efficient if data is shared between operators and regulators. A *centralised agency would allow all gambling operators to take a cohesive and collaborative approach to minimising gambling-related harms.* Data could be shared in an encrypted manner between sites to enhance the effectiveness of self-exclusion and limit setting and player identification, including age verification. An existing example of a secure service for managing self-exclusion across operators is VeriPlay, powered by Bet Buddy. VeriPlay aims to act as an intermediary to assist online gambling operators to more effectively use their player data to protect vulnerable players. The system will maintain a centralised database of self-excluded players, whose details are safely and securely stored using decoded player data and encryption algorithms. Operators can add self-excluded players and check whether new or existing players should be excluded. The adoption of such a system by an operator would strengthen their compliance with responsible gambling policies and processes.

Advertising of Gambling Products (including Wagering)

Sports-betting is Australia's fastest growing form of gambling, a fact primarily attributed to the increased popularity of interactive wagering complemented by aggressive advertising on television. Such advertising is portrayed not only through commercial advertisements but embedded in sports commentaries during telecasts. Partnerships between Internet gambling corporations and sporting associations appear to be quite symbiotic as costs associated with sports increase and sports fans represent an ideal market for online gambling (Lamont, Hing & Gainsbury, 2011). The trend is apparent that lucrative gambling contracts and sponsorship of sporting clubs and television broadcasts is now replacing alcohol and tobacco sponsorship.

Advertising and aggressive promotion of online sports betting plays a significant role in the influencing participation rates among youth. This is evidenced in anecdotal reports among some treatment providers of a rapid escalation in young males presenting for treatment for excessive sports betting.

Although mandated and self-regulated codes of conduct restrict the involvement of other “non-healthy” products including tobacco, alcohol, and junk food, little attention has been paid to the potential harm caused by sports sponsorship from Internet gambling corporations. The same arguments that has led to the banning of alcohol and tobacco sponsorship of sporting activities applies equally to gambling; namely influencing the attitudes and behaviour of youth to encourage gambling behaviour. The prominent exposure of gambling products normalises this activity and associates it with healthy activities and role models posing a direct risk to youth who are susceptible to influence (Monaghan & Derevensky, 2008; Monaghan, Derevensky, & Sklar, 2009). *It is argued that the advertising of gambling and its integration within sports commentaries ought to be restricted and that appropriate guidelines be established. The involvement of Internet gambling sites in the sponsorship of sporting teams and events should be carefully considered and regulated to reduce any risks of exposure to vulnerable populations.*

Recent policy changes to restrict the involvement of online gambling and wagering providers with sporting teams are commended. However, unless strict policies are mandated by legislation there will remain temptations to utilise funds provided by online gambling providers through creative avenues allowing continued marketing and promotions. *Regulators must carefully consider and set limits on the degree to which online gambling may be promoted during sporting events with clear penalties that are enforced for teams, individuals and event organisers that do not abide by these policies.*

Regulations must also be consistent and take a measured, evidence-based approach to balance restrictions with the potential for harm. It is clear from tobacco and alcohol research that marketing associated with sports does influence children’s brand preference (see Monaghan et al., 2009). Studies involving Canadian adolescents report that advertisements for gambling products increases the extent to which youth think about and want to try gambling as well as the likelihood of youth engaging in gambling (Derevensky, Sklar, Gupta, & Messerlian, 2010; Felsher, Derevensky, & Gupta, 2004). However, given the proliferation of marketing and promotion of gambling in society, currently, there is insufficient evidence to clearly demonstrate a causal pathway between advertisements linked with sports and increased gambling participation among children and vulnerable populations. *To fully inform policy, comprehensive*

and methodologically robust research must be conducted to investigate the impact of current and proposed advertising regulation on vulnerable populations.

Self-help and brief treatment options

Given that fewer than 10% of problem gamblers seek formal treatment, typically in response to life crises, new forms of treatment should be considered to assist problem gamblers unwilling or unable to access existing treatment options. *Internet-based treatment options represent a new form of help that may be more appealing to individuals*, particularly those comfortable and familiar with Internet technology. Emerging research is demonstrating the effectiveness of Internet-based interventions, including online therapy and self-help options, for gambling, including youth-specific interventions (Gainsbury & Blaszczynski, 2011a; 2011b; Monaghan & Blaszczynski, 2009; Monaghan & Wood, 2010). *The implementation of relatively simple Internet interventions, such as brief assessments with automated normative feedback, may be particularly useful in increasing awareness of potential gambling-related problems amongst vulnerable populations and lead to appropriate behavioural regulation and change. Such strategies may even be incorporated as a mandatory component of Internet gambling sites as a responsible gambling strategy.* See Gainsbury & Blaszczynski (2011a) for a complete overview of the advantages of online self-help treatment for gambling problems and the necessary components of a successful program.

The effectiveness of existing self-exclusion programmes

Self-exclusion programs are an essential part of any harm-minimisation strategy offered by a gambling operator or jurisdictional regulator. Despite the severe limitations to the available literature, there is some evidence that self-exclusion programs generally provide benefits to problem gamblers in terms of reduced gambling behaviour and reduction of problem gambling severity. There is also evidence of improved psychological and social functioning, perceptions of control over gambling behaviour and increased likelihood to seek formal treatment. However, existing self-exclusion programs are under-utilised and do not appear to be effective in preventing gamblers from breaching agreements or gambling on non-restricted activities. Although individuals must retain responsibility for their own gambling behaviour, if they request assistance in the form of a self-exclusion agreement, gaming operators should make every effort to uphold this agreement and prevent individuals from entering gaming venues. These efforts should be monitored by regulators to ensure that operators are adhering to all procedure and policies as outlined in regulation.

Key elements for self-exclusion program include:

- Self-exclusion programs should be flexible to accommodate the needs of individual gamblers; not all self-excluders are problem gamblers in need of permanent exclusion and ban lengths of various lengths should be offered. Every effort should be made to provide appropriate resources and referrals for all self-excluded individuals including Internet-based treatment and self-help options for those unable or unwilling to see a treatment professional.
- A self-exclusion program must be recognised as a severe form of pre-commitment intended for those who are unable to control their own gambling behaviour. As such it must be sufficiently powerful to uphold self-exclusion agreements to the highest standard that can be reasonably expected in order to offer the maximum benefits and protection for individual self-excluded gamblers. It is reasonable to expect patrons to provide identification when entering gaming venues that can be checked against an electronic database of self-excluders. Identification should be checked again at all reasonable points including for jackpot winners, and when registering or claiming loyalty points. Penalties including forfeiting winnings, warning letters, community service and fines should be issued for individuals who breach agreements to increase the incentives for self-excluders to not enter gaming venues. Similarly, serious penalties should be issued for operators who do not comply with the policies and procedures of self-exclusion programs as outlined by regulators.
- Self-exclusion agreements should be comprehensive to limit gambling across the state including at all major venues and, where applicable, Internet gambling. By requesting a self-exclusion agreement individuals are indicating that they are unable to control their gambling behaviour, which is causing significant problems. Research demonstrates that self-excluded individuals often gamble while self-excluded, at excluded venues and at other accessible venues or on different forms of gambling. If the government is to implement an effective self-exclusion program, licensed operators must agree to apply it to all major venues that offer EGM gambling and Internet gambling sites.
- Self-exclusion programs must be monitored and evaluated periodically to ensure they are being implemented as required and having the intended impact. Due to the lack of 'gold standard' it is expected that such programs would require constant evaluation, monitoring and modification as necessary and in line with developing technological capabilities. Evaluations should be conducted by independent third parties to ensure that individuals

and operators are complying with agreements and the objectives of self-exclusion programs are being achieved.

Third party self-exclusion programmes

In addition, in some jurisdictions, including the ACT, NSW and Tasmania, family members or concerned significant others can initiate exclusion agreements. In these cases, the gaming venue may refer the family member to an appropriate third party to investigate the allegations and consider whether the person's gambling is causing serious harm. The individual should be consulted and offered the option to sign a self-exclusion agreement. If the individual does not agree, a decision may be made to impose an involuntary exclusion where the welfare of the individual or a family member is seriously at risk. Any investigation of a request for third party exclusion should require the family member to provide evidence demonstrating their identity, the identity of the subject of the complaint and proof of their relationship as well as evidence of the actual or potential harm being caused by the alleged problem gambler.

The sort of harm that may warrant third party exclusion is:

- Stealing money from family or others to gamble
- Borrowing money from family to gamble and not repaying it
- Seeking family help to pay for living essentials such as rent or food
- Children left alone while person gamblers
- Family support children or gambler's partner due to financial neglect by person

When considering requests for third party exclusion, care should be exercised by the gaming venue or operator to protect the rights of the individual.

A nationally co-ordinated self-exclusion programme

Self-exclusion programs should be harmonised between states to increase the effectiveness of these programs. Increasing the span and applicability of self-exclusion agreements between states, particularly neighbouring states, would reduce the likelihood of self-excluders accessing other forms of gambling and increase the benefits of programs. This would require information sharing between operators, although each province could maintain their independence in how programs are administered and enforced. A national self-exclusion program could be managed by an electronic database shared by operators. Many gambling venues require patrons to show

identification to verify their address and age before being permitted entry. It is feasible for a system to be developed to scan state-issued identification documents, such as driver's licenses, to automatically identify individuals on a self-excluded list. Identification should be required to be scanned before access to venues that allow gambling, or before access to the gambling sections of venues.

Attempts to enforce self-exclusion programs across jurisdictions and venues would greatly increase the credibility of self-exclusion programs, which may increase the number of individuals that sign up for exclusion. If venues cannot prevent self-excluded individuals from gambling, how can they prevent under-aged participation? Any argument that operators are unable to verify the identity of patrons allowed to gamble should be cause to question the ability of the operator to uphold the minimal requirements of having a gambling licence.

Commonwealth, state and industry funding for gambling research

Wherever possible, research should be conducted by independent, highly trained researchers, including academic researchers based at universities, which are non-profit organisations. It is essential that all research be peer-reviewed and that research be conducted independent of any interested party, including governments and the gaming industry in the case of gambling research. Researchers must be encouraged to publish research findings in peer-review, scientific journals where the research can be shared with the academic community and then translated into policy and practice. Given the restrictions on the number of publications possible from a single research study, it is essential that research findings not be made publicly available until after publication in the scientific field to avoid redundant publications and ensure that manuscripts will be accepted by journals that only publish new research. Publication of research in highly regarded scientific journals is essential for academic career progression. Publication of research reports carries little weight in terms of career advancement in academia.

The current research funding situation in Australia makes it very difficult for academic researchers that wish to conduct research in the gambling field to acquire and retain jobs, and advance in their careers. The majority of funds for gambling research tend to come from government-related organisations for prescribed projects, often with unrealistic timeframes and expected outputs. Furthermore, many organisations, such as Gambling Research Australia, which received funds from the gambling industry, demand that they jointly own copyright, and in some cases are able to restrict publication of results, leaving very little incentive for universities to permit their researchers from accepting such grants. In the case of Gambling Research Australia,

who encourages publication of results in scientific journals, this organisation also demands the right to place full copies of research reports online, which generally happens before researchers would be able to publish results in scientific journals, subsequently dramatically hindering the publication process.

A further significant difficulty for academic gambling researchers is that funds from government-based research organisations and Gambling Research Australia are not recognised as nationally competitive research grants. Therefore, despite the large amounts of funds that can be brought into a university, with required overheads deducted, universities do not receive additional funding from the Government to support the additional costs, including researcher salaries, which are generally not covered in these grants. Subsequently, universities do not reward researchers that achieve gambling grants, unless they come from the nationally competitive programs run by the ARC or NHMRC. Unfortunately, the ARC and NHMRC do not appear to recognise gambling or problem gambling as being a research priority and it is extremely difficult to obtain funding from these schemes for gambling research. Where research grants are successful under these schemes, they generally have to be pitched at a related area to be considered important. If the Commission truly believes that research should be properly reviewed and given oversight by an established and respected research body, such as the National Health and Medical Research Council then *gambling and problem gambling must be specifically listed as a national research priority and these granting bodies should be encouraged to fund gambling research*. This would ensure that academic researchers actively pursue and complete gambling-related projects, are free to publish in academic journals and are fully supported by Universities.

An additional difficulty to conducting methodologically robust, meaningful gambling research in Australia is the relatively low levels of collaboration and cooperation between stakeholders, including governments, industry, community groups and academic researchers. It is acknowledged that these groups have different agendas; however, there appear to be relatively low levels of trust between the parties, which creates substantial problems in terms of achieving research that can be applied to policy and practice. The vast majority of research in the field of gambling has been conducted with university-based students in laboratories using experimental situations and risk or decision-making tasks (Gainsbury & Blaszczynski, 2011c). This practice is used for convenience and to reduce costs (due to inadequate funding) as access to real gambling venues is generally restricted as is recruitment of gamblers. Institutional ethics committees also create difficulties by not approving studies that include gamblers spending their own money, forcing research to be conducted on non-gambling tasks. Subsequently, research findings are limited in the extent to which they can inform policy and practice.

However, some collaboration has been conducted with cooperation between governments, industry and researchers. One example is the recent trial conducted by Professor Alex Blaszczynski and Dr. Sally Gainsbury of the Blue Gum Gaming Machine in several Queensland Surf Clubs. The machine was created and installed by Aristocrat Technologies and approved by the Queensland Office of Liquor and Gaming Regulation. The trial was conducted with real gamblers in venues and results demonstrated that responsible gambling features built into EGMs may be successful in facilitating responsible gambling. Funding for the research was provided by Aristocrat, however the research was independently conducted and the industry and government bodies had no influence on the research or the outcomes or reporting of results. The authors are free to publish the findings and the stakeholders have compromised by publishing a short version of the report. This is an excellent example of constructive collaboration that has resulted in significant and practical outcomes that will guide gambling policy.

Despite the success of this project, the results were immediately derided by some parties due to the involvement of industry funding and support. The notion of perceived conflict of interest is given substantial weight in the academic community, to the extent that the researchers involved in the Blue Gum Trial were informed that they were not considered suitable to write an editorial piece for the highly regarded journal *Addiction* due to their associations with the gambling industry. This reflects the view of a community of researchers that hold that any association with the gambling industry, including organisations that receive funds from the industry, causes a conflict of interest and taints any research that the individual will ever conduct (Adams, 2011; Orford, 2011). Although this argument may be highly principled, it is somewhat irrational given that actual research on gamblers cannot be conducted in isolation from the industry. Furthermore, any researchers that refuse to engage in collaborative research or accept funding through direct or indirect industry sources (including any funds coming from government bodies or organisations that receive funds from the government such as NHMRC due to taxes obtained from gambling) are unlikely to achieve any career enhancement.

Therefore, it is the view of this researcher, that *gambling and problem gambling research be ranked as national research priorities and research bodies including the ARC and NHMRC be encouraged to fund gambling research*. Furthermore, *stakeholders should be encouraged to actively collaborate with academic researchers* and provide access to patrons and venues as necessary to ensure that research is meaningful and subsequently can inform policy and practice. Universities should be encouraged to recognise the importance of gambling research and to minimise the perception of conflicts of interest, *academic researchers should retain the*

intellectual property rights of any research and be given independence to conduct research and publishing findings.

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