

Submission to Senate Standing Committees on Environment and Communications- inquiry and report in relation to the Interactive Gambling Amendment (Sports Betting Reform) Bill 2015

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Disclaimer: The views expressed here are those of the author and may not reflect those of the Australian Institute of Family Studies or the Australian Commonwealth Government

This review of the provisions in terms of online sport betting is timely and reflects community concern about this form and mode of gambling in Australia. The recent report by Financial Counselling Australia '*Duds, Mugs and the A List*' also highlights concerning practices by some onshore sport betting agencies. The bill addresses some potential shortcomings of the *Interactive Gambling Act 2001* (Cth) (the Act) in relation to sports betting as it exists today. Sport betting has expanded in breadth of coverage and uptake dramatically since 2001.

I would like to make the following submission that discusses the proposed amendments to the Act. I am restricting my comments to consideration of how particular research I have been involved in may inform considerations. I am available for further consultation in relation to this or discussions more broadly as required.

Proposed subsections 14A: The need for employees to be provided with information, training or instruction in relation to:

- recognising problem gambling behaviour,
- assisting individuals to access information regarding the register and other services or programs in relation to problem gambling,
- and dealing with individuals who have identified personal gambling problems.

This is an important consideration and it has been researched in relation to land based gambling (e.g., Thomas, Delfabbro & Armstrong, 2014). This research found that it is possible for workers in land-based venues to identify people with gambling problems through quick, simple and easily taught behavioural observation techniques using appropriate identification tools (e.g., the Gambling Behaviour Checklist for Electronic Gaming Machine venue staff; GBC-EGM). Our research suggested that effective and systematic identification of problems is much more likely to occur in a supportive environment where such identification is expected.

However, identification is only part of the solution. Once a gambler has been identified as possibly experiencing problems, staff should feel confident to intervene with a view to offering support and assisting these gamblers to find assistance if this is desired and required. This last goes beyond merely assisting those people who have self-identified a problem and suggests staff could be working pro-actively with customers who are showing signs of problems. This will only be possible where (a) there is a clear expectation that this is part of their job, (b) appropriate training is provided to enable staff to feel confident to do this, and (c) support is provided to staff at an organisational level.

Further, checklists appropriate to the online environment are required. Some items on land-based gambling checklists will not translate to the online gambling environment where gamblers are not visible to staff (e.g., signs of distress, dishevelled appearance). Other signs that may be pertinent to the online gambling environment but not relevant to land based opportunities will be missing from checklists developed with land based gambling. It is vital that staff are provided with tools that are appropriate to the environment to allow them to identify signs of gambling problems. The online environment also provides some advantages over present land based environments as all transactions are necessarily logged to an individual's account. Algorithms can be developed using identified online indicators within an electronic system to identify risky patterns of play and automatically flag gamblers displaying signs of gambling issues to staff (Thomas et al., 2014).

It is my opinion, based on my research and discussions with expert in the field, that this type of system will only be effective if (a) strong and clear regulations are implemented that (a) spell out expectations for organisations and staff with regard to identifying gambling problems and acting on this information, (b) empower regulators to check compliance with regulations, and (c) include significant consequences for non-compliance.

Proposed Section 61GC Micro-betting

Micro-bets within the sports betting environment make the betting experience much more continuous that would otherwise be the case as an individual is betting on a number of events within a game rather than simply betting once on the outcome of a game. Research has shown that the continuous nature of electronic gaming machine (EGM) gambling means that people can easily lose track of time and money spent as they become immersed in the experience and fail to realize how much money they are spending (e.g., Thomas, Sullivan, & Allen 2009). It is quite likely that there will be a similar outcome with regard to micro-betting in sports which will see gamblers betting with much higher frequency, whilst watching a sporting event. The combination of more frequent bets and the immersive experience of the game will result in the gambler having much less time to consider how much they have bet already, potentially leading to higher than expected expenditure.

Section 61GF: A national self-exclusion register

The Australian Gambling Research Centre (AGRC) has reviewed best practice in relation to self-exclusion. It found that the effectiveness of self-exclusion was increased when it applied across a wide region. It also found that a significant issue with current systems of self-exclusion is the reliance on staff to identify gamblers who have self-excluded but who return to the venue to gamble. This is likely where many people have self-excluded from a particular venue or where the self-exclusion has been in effect for a period of time. An electronic register that covered all national sites would overcome some of these problems as it would cover a wide region and would not rely on staff recognizing clients. It could be embedded within a precommitment system; however, this would need to be a full, universal system for the self-exclusion to be an effective support. It should be noted that a national system would not prevent gamblers from accessing international gambling websites. This review is not published at present but the author is available to discuss findings.

Section 61GN; and section 61HA – making self-exclusion easy

The AGRC review of self exclusion also found that it was important to remove barriers to self-exclusion such that that it is as easy as possible for gamblers to find, and access, self-exclusion when they are ready to take this step.

Section 61HE AND 61HF – time limits on self exclusion

Flexibility in the length of time for self-exclusion may be important for some people. Our review of the research suggested that it is likely that some people will prefer being able to self-exclude for long periods of time, or indefinitely, as this means they can set and forget, and are not required to onerously reapply for a further period of self exclusion. Other people, however, may be hesitant to sign up for self-exclusion if it is only possible to sign up for a long period of time and/or where revoking that exclusion is a difficult process (Thomas et al., 2010). The example provided in the explanatory memorandum (p11) suggesting that a report from a psychologist or counsellor could be required to accompany an application for removal from the Register could be seen by some to be too complicated and restrictive.

Section 61GG Precommitment options for accounts

The AGRC has reviewed best practice in relation to pre-commitment. We found that if the system has been set up such that all gamblers are required to set monetary and/or time limits (or pre-commit) to gamble it will encourage gamblers to think about how much they are willing to spend gambling. It also normalizes the act of setting limits. This review is not presently published but the author is available to discuss findings.

Published References

1. Thomas, A.C., Delfabbro, P., & Armstrong, A.R. (2014). *Validation study of in-venue problem gambler indicators*. Report prepared for Gambling Research Australia.
2. Thomas, A.C., Moore, S., Kyrios, M., Bates, G., Meredyth, D., & Jessop, G. (2010). *Problem gambling vulnerability: The interaction between access, individual cognitions and group beliefs/preferences*. Melbourne: Swinburne University of Technology. Report prepared for Office of Gaming and Racing, Department of Justice, Victorian Government.
3. Thomas, A.C., Sullivan, G.B., & Allen, F.C.L. (2009) *A theoretical model of EGM problem gambling: More than a cognitive escape*. *International Journal of Mental Health and Addiction*, 7, 97–107.