



Submission to Inquiry into Gambling Reform –
Pre-Commitment Scheme
21 January 2011
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Thank you for the opportunity to present a submission to the Inquiry. Appendix 1 sets out my background in this area. My submission focuses on the following 4 areas

- 1. Broad support for Commonwealth involvement in driving protection of gambling consumers**
- 2. The need for an integrated reform agenda on responsible gambling: combining pre-commitment with national gambling product (EGM) standards**
- 3. The need to focus on casinos, not just gambling in hotels and clubs. Assessing whether Australia’s 13 casinos should be accorded any concessions to player protections introduced by the Commonwealth government. Assessing how precommitment is currently configured at Crown Casino**
- 4. Articulating the public health approach underpinned by the ‘Loss of Control’ model rather than the addictions or informed consumer models.**

The submission is supported by a supplementary submission based on two related reports as an addendum to this submission:

- (1) Hancock and O’Neill (2010) ‘Risky Business: Why the Commonwealth Needs to Take Over Gambling Regulation’, ADRI Working Paper No. 11;
- (2) Hancock (2010) ‘How “Responsible” is Crown Casino? What Crown Employees Say’, ADRI Working Paper No. 14.

- 1. In terms of support for Commonwealth involvement in driving consumer protection in the area of gambling, this submission is supportive, given that:**
 - **Gambling sits along-side alcohol and tobacco as a ‘dangerous consumption’ which is preventable with the right policy levers**
 - **Gambling causes harm in the Australian community**
 - **There is broad community support for effective harm minimisation and responsible gambling measures.** These points are briefly discussed below.

Gambling sits along-side alcohol and tobacco as a ‘dangerous consumption’. These have in common a number of key characteristics:

- They are dominated by large corporate vested interests with elaborate chains of supply and inter-locking, frequently transnational, commercial and political interests;
- There is a proliferation of community access and encouragement of consumption of these products via industry advertising and promotion;
- Industries such as alcohol and gambling have the backing of state/territory governments in terms of tax and other concessions and affirmation of their role in tourism promotion;
- There exist asymmetries of knowledge between industry and the community; with industries like gambling, tobacco and alcohol spending millions on research on how to increase consumption and what product features “work” in terms of market-segment targeting and revenue-generation; but lacking transparency on public access to such information;
- Industry has a vested interest in normalising consumption. For example, the gambling industry claims gambling is recreational or “entertainment”; thus diverting attention from the individual and societal costs of predictable, known, gambling-related harms
- Moreover, casinos create their own demand and so do not act like an ordinary consumption commodity. Their consumption and distribution has adverse affects on others who do not consume or produce them (Hancock, 2010, np).

As the Productivity Commission report noted: ‘The potential for significant harm from some types of gambling is what distinguishes it from most other enjoyable recreational activities — and underlines the community’s ambivalence towards it’ (Productivity Commission, 2010, p. 11). In terms of potential harms, the Commission clearly differentiates the harms associated with different forms of gambling. ‘(P)eople who only play lotteries, scratchies, bingo or raffles face few problems compared to those who play EGMs, wager or play casino table games’ (2010, p. 4.1).

Gambling causes harm in the Australian community

After two decades of growth, gambling in Australia results in consumer losses in excess of \$19 billion a year. It is regulated largely by States/Territories and contributes on average, 10 percent of State/Territory revenues via various taxes and levies (higher in States such as Victoria (13 per cent), South Australia (13 per cent) and Northern Territory (17 per cent)) (Hancock and O’Neill, 2010).

The Commonwealth has commissioned two landmark Productivity Commission reports on gambling published in 1999 and 2010. In its latest report, the Commission is clear on the costly broad-ranging personal and community impacts of gambling and in particular, electronic gaming machines and casino gambling.

The adverse community impacts of gambling are now well-recognised and documented in terms of crime, family break up, financial ruin and bankruptcy, suicide and self harm

(Australian Institute of Primary Care 2006, Doughney 2006, 2007; SACES 2005; Productivity Commission 2009; de Castella 2009; Hagan 2010). Localised access means that harm is exacerbated by the ‘suburbanisation’ of EGMs in local clubs and hotels (e.g., Productivity Commission 1999; Banks 2002; Doughney 2002, 2006, 2007; SACES 2008). Gambling is widely recognised as a regressive tax; in that more disadvantaged individuals and communities are more likely to gamble on poker machines and contribute a disproportionate amount of income on gambling.

What families and communities see as ‘problem gamblers’ the gambling industry sees as their best customers. Indeed, research shows that regular gamblers contribute approximately 92 per cent of poker machine revenue; and Australian data confirms ‘the bulk of gaming revenue is from regular gamblers’ (Productivity Commission, 2010, Appendix C, p.20-21). Around 15 percent of regular players are problem gamblers, who contribute about 40 percent of revenue/losses. Regular gamblers thus need to be the focus of responsible gambling measures.

But despite States’ harm minimisation measures, gambling losses continue to rise. Measures such as clocks and lighting are seen as ineffective harm minimisation measures (Productivity Commission, 2010; FahCSIA 2008).

Gambling is conducted in a very different context today than twenty years ago. Changing technology will continue to result in rapidly changing products, which raise consumer protection and product safety concerns (Australian Institute of Primary Care 2006, Banks 2002; Dickerson 2003, 2004; Doughney 2007; SACES 2005, Productivity Commission 2010 as recognised in the gaming machine reforms recommended). The use of new technologies for protecting consumers and which can accomplish a range of tasks should be focused upon in considerations of pre-commitment. Technologies used for pre-commitment can also assist regulators in money laundering detection, player tracking and monitoring for consumer protection.

There is broad community support for effective harm minimisation and responsible gambling measures in the Australian community

Community opposition to gambling is not new and provides broad support for such a ban. Research confirms significant community opposition to gambling and recognition of the harms it causes.

‘Gambling has been imposed throughout Australia against the wishes of the majority of people and is a supply-led rather than a demand-led industry. In 1957, a year after poker machines were legalised in New South Wales, a study found that 65 per cent of people disapproved of them. In 1999, the National Gambling Survey found that 75 per cent of respondents thought gambling did more harm than good, and 92 per cent wanted no more poker machines’ (Harrison 2000).

Communities have been vocal in their opposition to gambling. In Victoria in 2003, the Gambling Research Panel funded 2003 Community Attitudes Survey (ANU 2004, p. 129) reported;

– 85 per cent of Victorians agreed that ‘Gambling is a serious social problem in

Victoria;

- 90 per cent agreed that ‘The Victorian government should reduce the number of poker machines’
- 76 per cent agreed that ‘Gambling is too widely accessible in Victoria’;
- 74 per cent agreed that ‘The number of poker machines in Victoria should be reduced’;
- 91 per cent agreed ‘There should be more clubs and hotels without poker machines’ and
- 87 per cent agreed ‘Banknote acceptors should be removed from EGMs’.

The Productivity Commission reports (1999, 2010; and Banks 2006) confirm the need for a brake on the harms caused by gambling. However many of the reforms introduced by State/Territory governments are circumvented by industry.

Governments have introduced many measures to address the harms associated with gambling machines, but the effectiveness of many of these is questionable. This includes requirements for:

- short periods of machine shutdowns. These typically occur in the early hours of the morning. They allow premises to be cleaned and maintained, but produce few obvious harm minimisation benefits.
- lowering the maximum bet limit from \$10 to \$5. If played at the fastest allowed rate, that means that the value of bets laid per hour will have fallen from \$12 000 to \$6000 (and expected losses down to \$600 from \$1200 an hour, which remains very high). Some jurisdictions have maintained the limit at \$10.
- reducing the value of notes that gamblers can insert at any one time into a machine from \$100 to \$50 — but retaining the capacity to insert note after note
- reduced cash input levels, such as from \$10 000 to \$1000. In this case, a player could still insert twenty \$50 notes consecutively into the machine. (Again, some jurisdictions have retained the \$10 000 limit.)
- ATM withdrawal limits of \$200 per transaction — but problem gamblers can go back time after time, subject to the normal arrangements they have with their banks
- mandatory clocks on machine displays, so people do not lose track of time. But most people have watches and they typically concentrate on the game.’

(Productivity Commission, 2010, p. 20).

2. The need for an integrated reform agenda on responsible gambling: combining pre-commitment with national gambling product (EGM) standards

No matter what form of precommitment might be introduced, whether mandatory or voluntary, a case should be made for structural reforms to gambling products; in particular EGMs and casino games (and especially gambling products with a continuous gambling platform).

The report by Hancock and O’Neill makes a case for an integrated National approach:

A National Action Plan for Gambling Governance and Re-Regulation is a whole-of-system public health approach, squarely based on a risk and prevention strategy that

incorporates:

- product (safety/regulation);
- venue (responsibility);
- industry obligations (host responsibility and duty of care);
- regulatory oversight (data monitoring);
- independent research (integrity);
- evidence based policy; and
- independent audit/monitoring of policy and venue-level interventions.

This is broadly along the lines of the key recommendation of the Productivity Commission's call for a new national generic consumer law (outlined in its *Review of Australia's Consumer Policy Framework*, Fitzgerald et al 2008) and emphasises product safety.

The Committee needs to consider introduction of a range of new product safety standards that go further than the current Productivity Commission (2010) recommendations.

to ensure that gambling consumers are protected from dangerous machines in the same way that automotive consumers are protected from dangerous vehicles. In particular these new standards should include changes both to gaming machines, gaming venues and regulatory oversight systems:

- banning note acceptors on gaming machines;
- banning ATMs in gaming venues;
- reviewing venue hours (mandatory 8 hour break/shut-down in clubs and hotels; 6 hours for casinos);
- introducing compulsory smart cards (or form of universal ID) linked to independent Central Monitoring System;
- slowing down the machines to a maximum loss of \$100 per hour;
- introducing a compulsory 10 minute cooling off period after 1 hour of continuous gambling;
- re-regulating casinos via mandated codes of practice (e.g., using central monitoring system (CMS) for independent monitoring and player protection interventions); and
- Putting in place indicators that measure the costs of gambling impacts-suicide, crime, debt in the community, bankruptcy etc. (Hancock and O'Neill, 2010, p. 13).

Pre-commitment on its own will not adequately protect.

3. The need to focus on casinos, not just gambling in hotels and clubs. Assessing how precommitment is currently configured at Crown Casino and whether Australia's 13 casinos should be accorded any concessions to player protections introduced by the Commonwealth government.

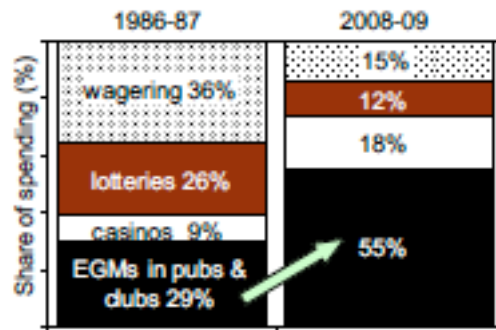
Should casinos be regarded as exempt from the full force of Committee recommendations?

Much of the focus of gambling policy debates is on community-based gambling in clubs and hotels. Whilst this is important, a closer examination of the casino sector in Australia is merited. In many ways the sector has been the "creeping giant" of the gambling

industry in terms of growth, venue size and intensified gambling environments. And Casino revenue has grown from 9 percent to 18 percent of gambling revenue between 1986-87 and 2008-09.

Figure 1 Share of Gambling Revenue by Activity: 1986/87, 2008-90

Source: Productivity Commission, 2010, p. 2.9.



Data source: Australian Gaming Statistics: 25th Edition, Commission estimates.

While approximately 5,700 hotels and clubs contribute 55 percent of revenue, clubs and hotels are proportionately less dependent than casinos on gambling revenue. Hotels are 28% and clubs, 61% reliant on gambling revenue) compared to the 78 percent reliance on gambling revenue of Australia’s 13 casinos (Productivity Commission, 2010, p. 6). With casinos proportionately more reliant on gambling income than other gambling venues, one can anticipate their resistance to regulatory provisions that could threaten to diminish such income. In this respect, the Australasian Casino Association has been vocal in lobbying government on policy issues and in representing the case for maintenance of “business as usual”.

A case study of Crown Casino in Victoria (Hancock 2010) has examined the wide-ranging tax and regulatory concessions granted to Crown Casino. Victoria is not alone in terms of exemptions from harm minimisation measures and other concessions accorded to casinos in other States and Territories.

Given current knowledge on the harms of certain products (EGMs in particular) and the importance of reforms to gambling environments, some jurisdictions such as Tasmania, are moving to embrace casinos in responsible gambling venue reforms. The Tasmanian Gaming Commission questions the legitimacy of dual standards and has pressed for casinos to be subject to the same protective reforms as clubs and hotels.

Different “harm minimisation” rules apply to EGMs at casinos than at pubs and clubs. For a variety of reasons this differential has emerged. For example casinos are allowed to have ATMs and their EGMs can have note acceptors. The absence of both of these in pubs and clubs is regarded as beneficial to problem and at risk gamblers. As approximately one third of all EGMs are in the two casinos, the TGC sees these different rules as anomalous when harm minimisation and consumer protection matters are considered. Given the large numbers of EGMs in casinos and

their higher rate of turnover, any further policy responses targeting problem gambling or consumer protection should be applied consistently to all venues (Tasmanian Gaming Commission (TGC) 2008, p. 7).

Accordingly, Tasmania has introduced new provisions reducing the maximum number of lines of play on EGMs from 50 to 30 and has applied the maximum bet limit of \$5 per spin ‘across all venues for all gaming machines’, to replace the \$10 limit in hotels and clubs and no limit in casinos (Tasmanian Gaming Commission, 2010).

Reduced cash input limits on gaming machines

The cash input limit on note acceptors will be reduced from \$9 899 to \$500. Once a credit meter reaches or goes over the \$500 limit, any further notes will be rejected (Tasmanian Gaming Commission, 2010).

The Tasmanian example applying responsible gambling provisions across all gambling venues including casinos, is unusual. The prevailing sense is that casinos are “exempt” environments, which merit separate, less stringent regulation via concessions to taxation and harm minimisation measures applied to other venues.

A key question for the Committee is whether precommitment and other provisions they recommend will apply across the board to all venues; or possibly more stringently (rather than less) to casinos – given their size of operation, location (frequently in the CBD of Australian capital cities), 24 hour operation and combination of alcohol with wide ranging gambling products.

Casino gambling environments are more intense and combine large-scale premises. On average, EGMs in clubs and hotels in Australia average \$56,000 losses (revenue) per year compared to about twice this amount in casinos (\$111,000 losses per year) (Productivity Commission, 2010, 2.29). This points to a range of questions that arise as to whether consumer safety is at issue in casino environments; which ‘farm’ machines more intensively than club and hotel venues.

What is it about casinos as gambling environments that accounts for higher player losses per gaming machine? Are there consumer protection issues or implications for responsible regulation? Can we expect corporate-run and owned casinos to implement self-regulation in a light touch regulatory environment? Is there sufficient protection from known harms from the forms of gambling and the types of gambling environments epitomised by casinos?

Areas of state-licensed “dangerous consumptions” such as alcohol, tobacco and gambling (introduced with strict conditions of licensing) have in common a number of key characteristics, which should signal the need for more, rather than less, stringent public-interest regulation of casinos than currently prevails under concessionary self-regulation; especially recognising how casino gambling environments are configured as “risky environments”. That is, they are “risky” by virtue of size, 24 hour operation, location (eg the accessible CBD location of many Australian casinos), multiple alcohol outlets, frequency of violent events requiring security interventions, a permissive approach to free drinks for premium players, levels of intoxication that require frequent removal of

patrons; a permissive approach to overcrowding and an “excusatory” approach to extreme events (Hancock, 2010). The case study of Crown Casino’s implementation of its Code of Conduct on Responsible Gambling and Responsible Service of Alcohol, basically concluded this is a case of both operator and regulator failure to implement responsible gambling.

The committee is considering a range of pre-commitment models. These have been reviewed by Parke et al (2008) and by Delfabbro (2008). To be effective, the chosen model will need to have some way of blocking play once a player has reached her/his limit.

Crown Casino’s Precommitment Program- Play Safe

The Productivity Commission (2020, p. 20) gives numerous examples of how harm minimisation measures introduced by various States/Territories ‘lack “bite”’. Crown’s Play Safe limits (pre-commitment) program could be seen in this light. The program is only available to Crown Casino Signature Club members and is optional. Players can set daily time or money limits and can set an optional annual limit on how much they spend on gaming machines and fully automated table games. (provided they have set a daily limit). The program really fails as a player protection as it only informs players they have exceeded their limit and does not shut down or block play. Players can request a decrease in limit which can be actioned immediately or an increase in limit which will not apply until 24 hours after they have made the change, and needs to be confirmed within the next 3 visits to Crown. However the program lacks teeth due to the fact that players can play on after the warning sound.

What happens if I reach my Play Safe limit?

Once you have reached any set Play Safe limit, an audible warning will sound and a message will appear on the Point Display window indicating that your limit has been reached. If you have reached any daily limit, you will no longer earn Crown Signature Club points on gaming machines and fully automated table games until 6am the following day.

How can I change or remove my Play Safe limit?

You can request a change or removal of your Play Safe limit at any time. To change or remove your limit, visit any Crown Signature Club information desk or the Crown Responsible Gaming Support Centre.

A decrease of any limit will take effect immediately.

An increase to any limit will not apply until 24 hours after you have made the change.

If you decide to increase your limit, you will need to confirm this increase after the initial 24 hour period. Confirmation can be made at any VIK or any Crown Signature Club information desk.

Failure to confirm the increase within your next 3 visits to Crown will result in the previous limit being reinstated.

- Play Safe limits may be time limit only, or a spend limit only, or both a time and spend limit.

- Play Safe for gaming machines is only available to Crown Signature Club members who have agreed to receive and have viewed their Player Activity Statements within a 12 month period, who have a PIN and who are not excluded from the Casino for any reason.
- Play Safe for Fully Automated Table Games ('FATGs') is available to Crown Signature Club members who are not excluded from the Casino for any reason.
- Play Safe is optional for Crown Signature Club members.
- Play Safe can only be set by the Crown Signature Club member whose name appears on the Crown Signature Club card.
- Appropriate identification is required to set or change Play Safe limits.
- Daily time and daily spend limits apply from 6am until 6am the following day.
- Should a limit be reached, an audible warning will sound and a message will appear on the gaming machine's and FATG's Point display.
- To set an annual spend limit a daily spend limit must also be set. Annual spend limits are optional.
- Annual means from 1 January until 31 December the same year.

(Crown Casino Play Safe Limits 2010)

Not only does the Crown program lack 'bite' but ironically, it is the gateway for Ministerial dispensation allowing up to 1000 of Crown Casino's 2,500 gaming machines from being subject to harm minimisation measures related to spin rate, note acceptor limits and payouts of cash-outs over \$2000 by cheque.

4. Articulating the public health approach underpinned by the 'Loss of Control' model rather than the addictions or informed consumer models.

A gambling industry focused primarily on profit maximisation, compromises its commitment to consumer protection and the precautionary principle emphasized by a public health approach to prevention of harms¹.

Under a public health approach, consumer protection is a priority driven by questions about product safety, the regulation of gambling venues and the protective measures taken. Government "re-regulates" in favour of consumer protection regulation. A genuine public health model emphasises research and action on the social determinants of health and well-being, gambling impact monitoring and evaluation. This model is underpinned by the precautionary

¹ The dominance of profit maximisation is illustrated in a 2002 leaked Tattersall's document with data on a card-based loyalty membership scheme tested across 13 venues in 2002 based on internal industry data and reported by Doughney (2006, p. 353 citing a Tattersalls report) showed:

- The 'advantage' scheme explicitly targets already 'high turnover' or heavier users. It does this by offering 'rewards' designed to keep them at the machines for longer periods (2002, p. 45).
- The report designates women as main the target market, because about two-thirds of revenue comes from women. Therefore, it says, 'promotions should generally not be based on the preferences of male customers' (2002, p. 26).

.....it undermines the image that 'a harmless night out at the pokies' is the main source of the industry's revenue.'

principle, emphasising risk avoidance and risk reduction (prevention); with government as public interest protector.

An over-arching risk and prevention strategy locates the entire population along a continuum of gambling risk, with appropriate interventions differing for different levels of risk/problem, thus differentiating “risk” from “problem gambling”. It offers prevention and treatment on a continuum from brief interventions (for example in primary care or community counseling settings) to intensive intervention (treatment) (Hancock and O’Neill, 2010, p. 38).

Other have discussed the limits of pre-commitment for those who are already experiencing problems (who are likely to set overly high limits for funding gambling) (Delfabbro, 2008). Any consideration of precommitment, if intended to assist problem gamblers and not just those ‘at risk’, needs to take into consideration the research on problem gambling which establishes players ‘loss of control’ as they enter into a ‘zone’ of lack of control where rational decision making is negated (Dickerson, 2002; 2003; Productivity Commission, 2010).

This calls into question pre-commitment programs which assume a capability for rational decision making; characteristic of the ‘informed consumer model’. Such a model may fit recreational players but not those at moderate risk or those experiencing problems; which is why the loss of control model coupled to consumer protection, is so important.

References

ACIL (2006) The Impact of Gaming on Ballarat Revisited (referred to by Banks 2006).

Australian Institute for Primary Care, La Trobe University (2006), The Changing Electronic Gaming Machine (EGM) Industry and Technology, commissioned by the former Victorian Gambling Research Panel. Accessed at: www.justice.vic.gov.au

Australian National University (ANU) (2004), 2003 Victorian Longitudinal Community Attitudes Survey. Mc Millan, J. and Marshall, D. Australian National University, Centre for Gambling Research. Melbourne: Gambling Research Panel of Victoria.

Banks, G. (2002) ‘The Productivity Commission Inquiry into Australia’s Gambling Industries’, 12th Annual Conference of the National Association for Gambling Studies, (NAGS), Melbourne.

Banks, G. (2006) The Productivity Commission Inquiry: 3 Years On, Available at: www.pc.gov.au/speeches.

De Castella, A., Bolding, P., Field, M., Harrison, K., Butler, S., Cosic, S., Keppich-Arnold, S., and Kulkarni, J. (2009), ‘Problem gambling and suicide: a community partnership’. Paper presented at the 19th National Association of Gambling Conference, Canberra.

Delfabbro, (2008) *Australasian Gambling Review 1992-2008*. Melbourne: Gambling Research Australia.

Dickerson, M. (2004), 'Measurement and Modelling of Impaired Control: Implications for Policy', *Insight Problem Gambling Conference*, Halifax, Nova Scotia.

_____ (2003), 'Exploring the limits of responsible gambling: Harm minimisation or consumer protection?' i 15 (1), pp.29-44.

Doughney, J. (2007), 'Ethical blindness, EGMs and public policy', *Journal of Mental Health Addiction*, vol. 5, pp. 311-319.

_____ (2006), 'The poker machine state in Australia: A consideration of ethical and policy issues', *International Journal of Mental Health and Addiction*, vol 4. pp. 351-368.

_____ (2002), *The Poker Machine State: dilemmas in ethics, economics and governance*, Altona, Victoria: Common Ground Publishing.

Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) (2008), *A National Snapshot of Harm Minimisation Strategies*. Accessed at: <http://www.fahcsia.gov.au/SA/GAMBLINGDRUGS/PUBS/NATIONALSNAPSHOTTARMMINIMISATION/Pages/default.aspx>

Hagan, K. (2010), 'Gambling linked to one in five suicide patients, *The Age*, April 21.

Hancock, L (2010) 'Responsible Regulation? Regulating social harms' paper presented at the Annual Regulatory Affairs International Symposium, London: Centre for Parliamentary Studies, September.

Hancock, L. and O'Neill, M. (2010) *Risky Business: Why the Commonwealth Should Intervene to Re-Regulate Gambling*, Alfred Deakin Working Paper No. 11, ADRI, Deakin University, Geelong.

Harrison, B. (2007), 'Casinos and regeneration: the story so far', Briefing Paper no. 1 February, London: IPPR (Institute for Public Policy Research, UK).

Parke, J., Rigby, J. and Parke, A. (2008) *Cashless and Card-Based Technologies in Gambling: A Review of the Literature*. Birmingham: Gambling Commission, UK.

South Australian Centre for Economic Studies (SACES) (2008), *Social and Economic Impact Study into Gambling in Tasmania, Vol 1 & 2*. Report commissioned by the Tasmanian Department of Treasury and Finance. Hobart: Tasmanian Department of Treasury and Finance.

_____ (2005), *Community Impact of Electronic Gaming Machine Gambling A and B*. Report for the Gambling Research Panel. Melbourne: Department of Justice, Victoria.

Productivity Commission (2010), *Gambling: Inquiry Report*. Canberra: Commonwealth

of Australia.

_____ (2009), Gambling: Issues Paper. Canberra: Commonwealth of Australia.

_____ (1999), Australia's Gambling Industries. Report number 10. Canberra: Commonwealth of Australia.

Appendix 1

Assoc. Professor Linda Hancock (Ph.D.) is a social scientist in public policy, social policy, gambling policy and regulation and sustainability research. Professional roles include: Commissioner on the Victorian Law Reform Commission (LRC); Presiding Member on the Social Security Appeals Tribunal (SSAT); Director of the Public Policy Masters Program at University of Melbourne; Director of the Corporate Citizenship Research Unit at Deakin University; and Partnerships Manager at the Deakin University Alfred Deakin Research Institute (ADRI).

As Chair of the independent Gambling Research Panel (GRP) of Victoria (2000-2004), she was directly involved in the design and oversight of an extensive program of government funded gambling research up to the time that the Victorian government decided to take gambling research in-house.

She has been an invited presenter on gambling policy and regulation internationally (including EAGS - European Association of Gambling Studies - and Ontario Discovery conferences), has acted as an international peer reviewer and consultant to the UK, New Zealand and Canadian provincial governments, (including the casino loyalty player-tracking program developed by the Saskatchewan Gaming Authority) and the Ontario Problem Gambling Research Centre (OPGRC) and for other Canadian provincial governments.

From December 2007-2010 she has conducted research projects for the Responsible Gambling Fund (RGF) - the national charity responsible for commissioning research, prevention and treatment on gambling in the UK. She has conducted research in particular related to the 3 year £1m ESRC/RGF national gambling research program and a UK gamblers' help services national data system; and independent peer review of gambling industry research on the impact of FOBTs (fixed odds betting terminals) in UK bookmakers shops.

She is involved in collaborative research on gambling and community sustainability and public policy research in the UK, Canada, Australia, New Zealand, Macau and Europe and has authored numerous monographs and articles.

In terms of broader public policy expertise, she was the Australian writer in the Canadian Social Union Project five-country study on federalism and intergovernmental relations (1997-2000); was President of the Board of VCOSS and a Governor on the national Board of the Australian Council of Social Services (ACOSS) for 5 years; and Convener of Women's Electoral Lobby (WEL) Victoria for 4 years and on the national board of WEL. With an interest in public policy and sustainability, she has published books on *Health Policy in the Market State* (Allen and Unwin); *Re-Writing Rights in Europe* (Ashgate); *Women, Public Policy and the State* (Macmillan) and has a forthcoming books include: *Public Policy: Power, Partnerships and Network* (Allen and Unwin) and *Regulatory Failure? The Case of Crown Casino* (Australian Scholarly Publishing). She has published widely in journals and edited books and is currently working on research

on Corporate Social Responsibility and Gambling, Gambling Policy in Europe, and Casino Regulation.