



BETSAFE SUBMISSION TO THE INQUIRY INTO THE PREVENTION AND TREATMENT OF PROBLEM GAMBLING

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Executive Summary

BetSafe Pty Ltd provides an independent, comprehensive and integrated responsible gambling program for a group of leading NSW and ACT gaming machine venues as well as consultancy services and seeks to provide the highest standards in staff training, problem gambling counselling, self-exclusion and all other aspects of its program. BetSafe programs cover approximately one-tenth of the gaming machines in these jurisdictions.

1. The BetSafe Program

The BetSafe program was established in 1998 by Paul Symond, an expert gambling counsellor and incorporated many innovative new harm minimisation measures, a number of which have since been adopted by government and other sections of the gaming industry. BetSafe commenced with 11 major clubs and currently has 43 registered clubs as members. These clubs are listed in **Appendix A**.

BetSafe is independent of government, welfare or lobby group interests and receives no government funding. It is solely funded by its gaming industry members, which are predominantly larger NSW registered clubs. BetSafe program member clubs demonstrate a genuine concern for the wellbeing of their patrons by making available the best possible responsible gambling program. The Productivity Commission [1] in its landmark report into gambling said that:

“BetSafe, an initiative of a number of large New South Wales clubs, represents the most thorough and coherent approach of its kind”

The focus of BetSafe is to provide the highest quality of harm minimisation program in an integrated manner. The key elements of BetSafe are problem gambling counselling, staff training, consumer information, self-exclusion and compliance with legislation. BetSafe provides the world’s best practice in its responsible gambling program which integrates these key elements and a range of subsidiary elements to produce a highly effective outcome.

The integrated approach of the BetSafe program requires all gaming venue staff to be trained in the responsible service of gambling. The interaction of staff with patrons is one of the most important factors in minimising the potential negative impacts of gambling.

BetSafe 24 hour problem gambling counselling

Although many other problem gambling counselling services claim to offer a 24 hour service, in many cases phone calls are diverted to answering services or generic counselling services outside of business hours. The BetSafe program includes a free 24 hour problem gambling counselling service for members, guests, staff and their immediate families of BetSafe member venues. BetSafe’s 24 hour counselling service has operated continuously since 1998

Problem gambling may develop over a short or long period of time before individuals are willing to admit they have a problem and seek help. The moment at which a person realises that they are a problem gambler is the moment at which help should be available. These problem gamblers may reach a crisis point where urgent intervention is necessary at any time of day or night. It is not uncommon for problem gamblers in crisis to seriously consider self-harm. BetSafe provides a crisis intervention service, available 24 hours 365 days per year, for patrons who may threaten to self-harm. In the event of a crisis call, BetSafe have trained staff who will provide immediate assistance to the patron over the phone, and who will make site visits to a club as necessary.

The BetSafe program also provides:

- a comprehensive up-to-date policies and procedures manual;

- 24 hour support for staff of BetSafe member clubs in dealing with crisis situations, processing self-exclusions and managing problem gambling incidents;
- a “third party” exclusion policy & procedure;
- resources promoting responsible conduct of gambling and advice on their suitable placement;
- publications relating to available help in a number of different languages;
- free access to interpreter services for both telephone and face-to-face counselling;
- information about developments in responsible gambling policy and procedure;
- legal information and advice to problem gamblers and their family members; and
- Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) legal compliance systems.

Policies and procedures

BetSafe assists each member club to develop and implement their responsible conduct of gambling policies and procedures which are set out in a comprehensive Policies and Procedures Manual. These policies and procedures cover:

- unattended children;
- underage gambling;
- financial transactions;
- legal and compliance information;
- complimentary food and drinks;
- payment of jackpots and winnings;
- helping problem gamblers;
- dealing with third party complaints;
- exclusion procedures;
- responsible advertising and promotional material;
- gaming areas;
- staff gambling issues;
- training policy;
- customer complaints; and
- confidentiality and privacy

BetSafe has developed procedures to ensure the effectiveness of its self-exclusion program. Detailed staff training ensures that staff know when and how to talk to patrons about self-exclusion and how to process a request for self-exclusion. Simple but effective self-exclusion forms, flow charts and procedures ensure that self-exclusion works well, for the benefit of the gaming venue and patrons.

For those patrons who are known to have a gambling problem that is causing them harm but who refuse to self-exclude, BetSafe has implemented an involuntary exclusion process. BetSafe also has procedures to assess the suitability of requests made by patrons who wish to end their period of self-exclusion and re-enter the gaming venue, and for responding to complaints or exclusion requests made by relatives and other third parties.

BetSafe also provides consultancy services on responsible gambling issues to gaming industry providers including casinos, gaming machine manufacturers, internet gaming industry, governments, poker leagues, industry associations and international gaming providers. BetSafe was instrumental in establishing the Global Gaming Guidance Group (G4), an independent responsible gambling accreditation agency [2].

Duty of care issues and the risk of litigation ensure that responsible gambling issues are a priority for the gaming industry. BetSafe’s proactive approach to responsible gambling has enabled its member clubs to minimise gambling-related complaints and the risks associated

with patron liability. BetSafe's knowledge is based on its many years of experience working with both the gaming industry and consumers. BetSafe has expertise in all areas related to responsible gambling programs, including counselling, staff training, compliance auditing and legal knowledge.

BetSafe provides quarterly responsible gambling audits of its member clubs, involving actual visits by a senior BetSafe staff member to the gaming venue to check on compliance with the BetSafe program and advice to management on how to make their responsible gambling program most effective.

2. SYNAVAL evaluation of BetSafe program

The BetSafe program was independently assessed by the SYNAVAL organisation in 2000/2001. In particular, SYNAVAL assessed the effectiveness of the following elements of the BetSafe program:

- the uses of information, publications, signage and procedures;
- BetSafe staff training;
- BetSafe counselling; and
- BetSafe self-exclusion program.

SYNAVAL's evaluation demonstrated that the BetSafe program is highly effective. A copy of the SYNAVAL assessment can be provided on request.

3. Measures to prevent problem gambling

Provision of information

Signage is an effective way of conveying information to patrons. However, to be effective, signage must provide information that people want in a form and location that is clear, simple and attractive. We consider that much mandatory gaming venue signage has limited effectiveness due to the prescribed content and location not being appropriate to patron's needs.

Many gaming venues now have electronic signs, scrolling screens, message boards and other mediums that display a variety of advertising messages. We have found that these are effective mediums for promoting the various aspects of BetSafe's program such as counselling and self-exclusion because they are attention-grabbing and dynamic.

BetSafe's distinctive stop sign notices have been effective in gaining the attention of gaming machine staff and patrons. SYNAVAL's independent evaluation of BetSafe found that 98% of staff and 64% of members had seen the BetSafe problem gambling warning notice. Of those people who had seen the notice, 43% rated the notice as effective in encouraging people to gamble responsibly while 42% rated the sign as not effective. Staff were more likely to rate the notice as effective (48%) than members (33%).

SYNAVAL's independent evaluation found that 92% of staff and 58% of members had seen the BetSafe counselling services sign. Of those who had seen the sign, 47% rated it as effective, and 53% rated it as not effective. Staff were more likely to rate the sign as effective (47%) than members (34%).

We have found that a creative approach to signage which emphasises patron responsible behaviour is more effective than a drastic warning. Signage needs to be changed and moved regularly otherwise "sign fatigue" sets in and patrons learn to ignore the signs and their content.

Signage advising of availability of counselling services is also essential. Problem gamblers know the signs are there and can then find the information at their moment of crisis. However these signs are targeting a different group, namely those who are seeking help and should not be combined with signs warning of the hazards of gambling. Brochures and particularly wallet size cards bearing the BetSafe 24-hour telephone number can be easily picked up and carried in the pocket or purse until the person is ready to make the call. We have encountered problem gamblers who have picked up a BetSafe card months or years before they made the call but kept the number as a sort of insurance for when their gambling might bring them to crisis point.

We consider that the incorporation of clocks and currency data in gaming machine displays has been a positive step in providing gaming machine players with information about the time and amount of credits a player is gambling and total credits. In the past there was considerable discussion about the absence of clocks in gaming venues and the incorporation of this information into the screen of gaming machines can only be considered a positive innovation. The Nova Scotia Gaming Corporation Responsible Gaming Initiative required video lottery terminals to be fitted with a permanent on-screen clock. It was found that the clock assisted players to keep track of time and to play within their desired limits.

Player information brochures are useful for those new to gaming and should provide simple explanation as to how machines work, and random nature of wins. BetSafe clubs display additional BetSafe brochures as part of the BetSafe program of responsible gambling. The value of brochures should be explained as part of the staff training process. Patrons needing information or counselling are more likely to take and read a brochure if it is handed to them by a staff member with an accompanying positive comment.

Problem gambling is a community health issue and it is desirable to have a general community awareness of the risks and dangers of problem gambling. Advertising should emphasise the need for the individual to gamble responsibly by setting a budget and sticking with it. Problem gambling counselling services also need to be promoted to ensure awareness.

Individual session information & player activity statements

We consider that information about each individual gambling session is not as helpful as the longer term information provided by player activity statements. This is because of the significant variations between individual gambling sessions.

Most NSW club patrons who gamble regularly are members of player reward schemes and are entitled to obtain this information by way of player activity statements. The number of patrons requesting player activity statements is very small. One BetSafe club has reported to us that it promoted the availability of player activity statements to its 50,000 members and is disappointed that not one member has yet requested a statement.

The incidence of problem gambling remains of significant public concern unacceptably high in Australia and there is a strong need for more effective preventative measures to enhance consumer understanding of gambling and its risks. Educative strategies and the provision of information and warnings about gambling products could be more effective. This should begin at school age and continue on into adult education. The focus of gambling marketing should be on the entertainment value of gambling rather than the prospect of winning or paying for living expenses with gambling winnings.

Secondary school education

Learning about gambling before the age of 18 enables young people to make informed decisions on whether or not to gamble once they become an adult. This has been largely neglected by State Governments and schools are usually too pressed for resources to adequately develop their own materials.

Gambling education is vital to ensure that young people understand the way gambling works and the risks involved before they begin experimenting with gambling. The best time is the mid-teens, when young people become more away of money and the existence of many gambling options. Because internet gambling is increasing popular, it is no longer appropriate to wait until a person is on the verge of adulthood. Many younger teenagers are already gambling on their computers and phones.

Parents can assist in educating their teenagers about gambling and there is a need for more resources being made available to them. However many parents are unwilling or unable to provide information about gambling to their teenagers, because they don't understand gambling themselves, they may be migrants and have had no exposure to gambling or simply consider it is the responsibility of the schools or government to do this.

BetSafe believes that there is a place for preventative education to be included in the national school education curricula

BetSafe trialled a revised responsible gambling educational module in late 2011 at Trinity Catholic College in Sydney, in conjunction with DOOLEYS Lidcombe Catholic Club. Feedback from the school's students and staff was very positive (see **Appendix B**). The module incorporates the following:

- simulated demonstration of a gaming machine random number generator;
- simulated return to player demonstration;
- interviews of recovering problem gamblers; and
- audience participation.

The session runs for 1 hour and, in line with all BetSafe training, is straight to the point, relevant and effective. The module can be run as a stand-alone session or integrated into a school's existing PH/H/PE or pastoral care classes. BetSafe is also able to provide schools with resources and information for inclusion in follow-up lessons.

The learning outcomes for the module are as follows:

1. Give students a basic understanding of how gambling works
2. Provide an overview on problem gambling
3. Provide students with advice and strategies for helping themselves, a friend or family member who may be affected by problem gambling

Student and staff feedback was very positive and highlighted the importance of presenting responsible gambling in a way that is appropriate to young people. It is important to avoid the old-fashioned lecturing approach that paints gambling in a negative way. Young people want to experiment with gambling and will do so whatever we say. What they need is the real facts in a way that helps them to appreciate the risks and the way that they can experiment without getting into trouble.

4. Measures which can encourage risky gambling behaviour

BetSafe provides guidance to its member clubs regarding their promotional and marketing activities. Our quarterly audits of clubs also check for promotional or marketing activities that may be considered undesirable.

BetSafe has a training course for marketing managers which covers the legal aspects of marketing and promotional activities for clubs and also best practice. It is important to differentiate between marketing and promotion of gaming machines as a normal recreation, and marketing which targets problem gamblers.

Irresponsible practices

Whilst most advertising of gambling products in Australia is accurate and responsible, there remain some areas in which irresponsible advertising and marketing practices exist. In particular, the online gambling industry engages in some marketing practices that are likely to exacerbate problem gambling, such as the provision of free credits to gamble and other inducements.

The casino industry is also responsible for some excesses in marketing, particularly in relation to high rollers. The reported Victorian Supreme Court decision in *Kakavas v Crown Melbourne* [3] highlights some of these irresponsible practices, including providing cash to gamble (“lucky money”), free tickets to shows and events, free travel, free accommodation, restaurant meals, golf tours, allowing cheque buy-backs, delayed cheque cashing, loss rebates, raised bet limits.

Clearly there is a place for gambling marketing and promotions that are effective in providing information and interest to recreational gamblers. What should be avoided are inducements that effectively target problem gamblers. Surprisingly, there has never been any substantial research in Australia on what types of marketing and promotions are liable to exacerbate problem gambling and we recommend this topic for your consideration.

5. Early intervention strategies and training of staff

Some well-meaning commentators have suggested that once a person is identified as having a gambling problem then the appropriate response is a ‘tap on the shoulder’ and a ‘quiet word’ about responsible gambling with information about counselling and self-exclusion. It is BetSafe’s experience that the ‘tap on the shoulder’ rarely has the desired response but instead encourages those at risk of problem gambling to deny that a problem is developing and to conceal their gambling behaviours.

Instead, BetSafe has found, through many years of practical experience, that the best time to offer assistance is when the individual gambler comes to the realisation that they have a problem and acknowledges their need for assistance by words or actions. At this point of time an immediate, firm response is highly desirable, to encourage the gambler to take action before they have the opportunity to cool off. This is why BetSafe’s self-exclusion, involuntary exclusion and counselling services focus on the immediate response to the person’s self-disclosure.

At the time the problem gambler has come to the realisation that they need help to manage their gambling problem, the gaming venue generally only has a very small window of time to provide assistance. If the problem is given the opportunity to think about self-exclusion, there is a high likelihood that they will change their mind. In the event that this does happen, we consider that the patron has put the venue on notice and failure to exclude the patron may present duty-of-care and the potential for litigation.

Identification of problem gamblers

There has been much discussion about how to identify problem gamblers in a gambling venue and this is being attempted in Victoria, South Australia and the Australian Capital Territory. In our experience, it is difficult to identify a problem gambler with precision. People who gamble will occasionally have bad days and display symptoms of problem gambling. Does that make them a problem gambler? No. Problem gamblers are often very private and secretive and may display few symptoms of problem gambling. What about them?

The big question is not the identification of a problem gambler but rather what the venue staff are required to do when they do form the opinion that a person has a gambling problem. If they are required to approach the person and offer information about counselling and self-exclusion, then they are likely to experience a negative response. Problem gamblers generally

deny their problem (even to themselves) and resent invasions of their privacy. At most, the person will leave that venue and go and gamble somewhere else.

We have not seen any research that proves that merely approaching a person you “identified” as a problem gambler actually results in a positive outcome. With knowledge comes responsibility. Once gaming venue staff have identified a person as a problem gambler, then they should actively encourage the person to self-exclude and seek help. They cannot stand back idly and watch the problem gambler continue to gamble and cause harm to themselves.

By contrast, BetSafe does not ask its venue staff to attempt to “identify” and intrude on gaming patrons. Instead, staff wait until the patron is ready to seek help, which they do by disclosing their gambling problem. They may do this directly in a statement, such as “I have lost all my money and can’t pay the rent” or by actions. The important thing is that the individual has reached a point of crisis in their life when they are motivated to change. This contributes to BetSafe very high success rate in assisting problem gamblers because, most importantly, they want to be helped.

Once a person identifies themselves as a problem gambler, then BetSafe believes that there is a moral duty of care to actively help the person. This may involve more than a tap on the shoulder and putting a brochure in their hand. If you know someone has a gambling problem, then it is morally questionable whether you can simply stand back and let them continue to do harm to themselves. BetSafe will encourage the person to self-exclude. If the person refuses to self-exclude and continues to gamble with possible harm to themselves and others, then the BetSafe club will involuntarily exclude them. If the family contacts the BetSafe club, then they can apply for third party exclusion.

6. Treatment of problem gambling

Problem gambling counselling and self-exclusion are considered to be the most effective forms of treatment for problem gambling. BetSafe counsellors have extensive experience in providing specialist gambling counselling and have a high level of success in this area. BetSafe provides both telephone and face-to-face gambling counselling for patrons of BetSafe clubs with the following features:

- skilled and experienced gambling counsellors;
- integrated telephone and face-to-face counselling;
- continuity of counsellor contact;
- 24/7 service;
- expertise in managing crisis situations and suicide prevention;
- close working relationship with BetSafe gaming venues important to facilitate referral and recommendation;
- self-exclusions processed immediately at the gaming venue;
- counselling for patrons seeking to end their exclusion; and
- ongoing gambling counselling for as long as is required.

Immediate response

As previously stated, it is critical that venues are able to respond at the time the problem gambler comes to the realisation that they have a gambling problem. In our experience, failure to do so can set back the period of time in which the person is going to seek help by a number of years.

BetSafe gaming venues promote BetSafe counselling as part of the BetSafe program of responsible gambling. In many cases gaming venue staff will assist a problem gambler to call BetSafe at the time they request assistance or apply for self-exclusion. Because BetSafe

counsellors provide training to the gaming venue staff, they are able to build confidence in the staff and a better understanding of what is involved in referring someone to BetSafe.

This contrasts with other counselling services, which may have their name on a poster in the gaming area, but have no personal interaction with gaming staff.

Effective referral requires more than putting a card in someone's hand. You need some form of positive comment such as *"Why don't you call a BetSafe counsellor. I've met some and am sure they can help you."* BetSafe telephone counselling is provided 24 hours a day, 7 days a week by specialist gambling addiction counsellors.

Crisis intervention is an important aspect of telephone counselling. All BetSafe telephone counsellors are skilled in providing appropriate responses to callers who may be threatening self-harm. There is a range of appropriate responses including arranging immediate face-to-face counselling or facilitating the attendance of a mental health crisis team. Time is of the essence when a crisis occurs and the BetSafe program seeks to have the person in crisis speaking to a counsellor within 45 minutes of first contact with gaming venue staff. Counsellors seek to integrate different aspects of assistance, such as face-to-face counselling and self-exclusion in the crisis intervention.

Flexible face to face counselling

Face to face counselling is provided for problem gamblers where needed upon referral from the telephone counselling service. Face to face counselling is available in the evenings and on weekends as well as during business hours. This is a significant difference between BetSafe and other gambling counselling services, such as those operated by industry associations and charitable bodies. Problem gamblers do not just need help during the hours of 9 am to 5 pm, Monday to Friday. BetSafe has no limit on the number of gambling counselling sessions, unlike a number of government funded services that only provided a fixed number of counselling sessions.

A rigid program of counselling that offers only a standardised program with a fixed number of counselling sessions lacks the flexibility to assist the wide range of people with gambling problems. The needs of individuals who seek counselling vary tremendously. In some cases a person may only attend a single counselling session to receive some benefit. In other cases, a series of intensive counselling may need to be followed by periodic maintenance counselling over a period of months. Some individuals value a long-term counselling relationship where they know they can call their counsellor at any time if they are suddenly struck with a strong urge to gamble. Some BetSafe counselling clients have maintained their abstinence from gambling by being able to call at such times, even over a period of years.

Case study – counselling

Client A undertook a series of counselling sessions with BetSafe, initially weekly, then fortnightly. After 3 months, client A and her counsellor agreed that she was now managing her life well without gambling. However, the following month, a crisis in client A's life caused her to "bust" and she lost her week's pay gambling. She knew that she could return to counselling without criticism and it took a further series of counselling sessions before client A was able to quit gambling for good.

BetSafe problem gambling counsellors utilise a range of counselling methods to provide flexibility and respond to client needs. Just as problem gambling has a variety of causes and issues, so too effective counselling needs to be provided in the form that is considered most effective in responding to those causes and issues.

BetSafe counsellors know and understand the particular culture and circumstance of each member club. Many of the calls to BetSafe are initiated by club patrons at the suggestion of staff who are trained and motivated to recommend BetSafe.

Gaming venue staff

BetSafe also provides counselling to gaming venue staff who are personally experiencing problems with gambling. There is a higher incidence of problem gambling among staff who work in a gaming environment when compared to the incidence in the general population. The extent to which the gambling environment contributes to staff developing problem, rather than persons with a potential problem being attracted to the work is not known. However, unless addressed, problem gambling can cause serious difficulties for staff.

Screening tests

BetSafe does not consider there is a need for a nationally consistent problem gambling screening test. Problem gamblers who attend gambling counsellors do not generally need screening and a range of screening tools that cover more than problem gambling are available for specific situations. General health professionals are better off just asking the person if they think they could have a problem with gambling. Problem gamblers are often secretive and dishonest and are already subject to excessive levels of questioning in intake processes etc. Some counselling services allocate an hour to intake procedures at the beginning of the counselling process and then wonder why so few clients come back for a second appointment.

Self-help materials

A range of self-help materials is already available, such as Paul Symond's book, *How to Stop Gambling*. This has sold in excess of 10,000 copies and many readers have responded that it is effective. We recommend that an independent evaluation of existing materials be conducted before the Commonwealth funds the development of more materials.

Self-help groups such as Gamblers Anonymous play an important role in providing mutual support and encouragement. We believe that the Coalition should look at ways in which additional support could be provided to Gamblers Anonymous and similar self-help groups.

What the Commonwealth should be doing is funding research into ways in which recreational gamblers can be better equipped to make decisions and keep control of their gambling. BetSafe and others have tried a number of strategies to provide information and responsible gambling strategies, but the cost of independent evaluation is high, so much of the available material is based on anecdotal information.

Self-exclusion programs

BetSafe provides a comprehensive and effective exclusion program that is one of Australia's longest running and exceeds comparable programs in many respects. Statistics relating to incidents in BetSafe clubs are provided in **Appendix C** and illustrate BetSafe vigorous approach to exclusions.

Self-exclusion is a highly effective form of assistance for problem gamblers that does not affect recreational gamblers. It should be noted that there is a considerable range of quality in various self-exclusion schemes. It's not only that the content of self-exclusion schemes varies, but the way each is administered. In particular, the effectiveness of a self-exclusion scheme can be greatly improved by strong promotion, motivated staff and proper intervention training.

The BetSafe self-exclusion program provides an effective break from gambling for problem gamblers who are beginning to address their problem. It is our experience that problem gamblers are most willing to self-exclude at the point of crisis, typically after a heavy gambling loss. Unless the problem gambler is able to immediately sign a self-exclusion deed,

the desire to self-exclude fades and may be overtaken by a desire to return and gamble to recover past losses. The sooner the problem gambler commits to self-exclusion, the sooner the gambler's recovery can begin.

BetSafe's standard period of self-exclusion ranges from a minimum of 6 months up to 12 months. We do not believe that any period of time less than 6 months provides an adequate opportunity for a problem gambler to achieve control over their gambling problem. On the other hand, we consider that a person who wants to self-exclude "for life" may find that after a few years they have overcome their gambling problem and regret such a lengthy commitment. So the range from 6 to 12 months is appropriate for most participants in the self-exclusion program. However, as explained under the heading "Re-entry following self-exclusion", no matter what the period of self-exclusion, a person must demonstrate recovery from their gambling problem before being allowed to return to the gambling environment.

So in a typical scenario, a patron who has been developing a gambling problem has a crisis after losing heavily and speaks to a staff member, disclosing the gambling problem. The staff member refers the patron to the duty manager, who explains the self-exclusion program. The patron decides to self-exclude, signs the deed on the spot, and has their photo taken by the club. The patron is also referred to counselling. The patron can go home confident that they are safe from returning to gamble again the next day.

Case study – immediate self-exclusion

T approached a staff member and told the staff member that she had lost all her money gambling and asked for a loan. T called the duty manager who interviewed T and explained self-exclusion and referred T to BetSafe for counselling. Although the incident occurred during the evening on the weekend, the staff member was able to call BetSafe and arrange for T to see a counsellor the following week. T agreed to sign a self-exclusion deed on the spot.

Multiple venue self-exclusion

Sometimes an individual who has self-excluded from one venue will commence gambling at a different gaming venue, particularly in the same region. This is not helpful either to the individual or the gaming venue. BetSafe will facilitate self-exclusion from multiple venues at the one time. BetSafe will organise the paperwork and take the photo of the person in a single interview. Instead of having to go from one venue to another to sign deed after deed, with a fistful of passport sized photos, the patron can nominate a number of venues where he/she gambles, and BetSafe will forward the request, a copy of the deed and a photo of the patron to the nominated gaming venues.

In NSW, there are a large number of gaming venues and it is an unreasonable burden for a problem gambler to make an individual application to every club in their local area for self-exclusion, plus an excursion to the AHA to be interviewed for hotel exclusion and another interview again at the casino. BetSafe has found that up to 10 gaming venues can easily be processed and enforced using existing technology in a single multi-venue application. BetSafe has been assisting patrons with this process since 1998.

Although some other industry initiatives are in favour of area-wide self-exclusions where a person can ban themselves from hundreds of venues at a time, BetSafe is opposed to such schemes due to the issues associated with enforcing these. In our experience, venues which receive these large area-wide self-exclusions have great difficulty in enforcing the exclusions because the enforcement relies on the physical identification of the problem gambler. As these venues have a large number of excluded persons which are unlikely to enter their venue, staff have difficulty in prioritising and memorising persons that are more likely to enter their

venue. This results in those venues self-exclusion programs becoming unenforceable and therefore unworkable.

The self-exclusion process is much simpler if a person can simply attend a single interview and self-exclude from all venues in the area. BetSafe uses a secure web-based self-exclusion database, which is both efficient and protects the privacy of the individual.

In late 2010 BetSafe launched an online self-exclusion service. This allows persons to log on to our website, enter their details and the venues from which they wish to be excluded and BetSafe will arrange for the necessary paperwork to be sent to the person. Once the person returns the paperwork to us, we notify the venues of their request for self-exclusion on their behalf. This new service means that patrons do not have to worry about the embarrassment of approaching a gaming venue staff member, or attending a counselling session, in order to self-exclude. In the 2011 calendar year, BetSafe received and processed requests from 65 problem gamblers to be excluded from clubs and hotels throughout NSW.

Involuntary exclusion

In some cases, a patron will disclose a serious gambling problem to staff, but refuse to sign a self-exclusion deed. In those cases the club will consider whether actual knowledge of a person's serious problem warrants the imposition of a period of involuntary exclusion. Independent advice is provided by the BetSafe consultancy in each case as to whether involuntary exclusion is justified. BetSafe takes the view that the club owes a duty of care to its" patrons to protect them from further harm when the patrons have clearly disclosed their gambling problem. This is initiated by the patron and is often brought about by a desire for help.

Although involuntary exclusion is not required by law in NSW, it is required in the ACT, where clause 14 of the Gambling Code of Practice states that:

"The Club must exclude a person from gambling at the Club if the Club has reasonable grounds for believing that the welfare of the person, or any of the person's dependants, is seriously at risk because of the person's gambling problem."

The ACT approach is somewhat more complicated than BetSafe NSW approach but still has the same objective, which is to involuntarily exclude known problem gamblers who are at serious risk of harm.

The issue of involuntary exclusion of problem gamblers has been unnecessarily complicated by the long-running debate over whether there is an effective means of identifying problem gamblers. We refer you to a helpful survey of experts conducted by the Australian Gaming Council [4]. The experts unanimously agreed that there is no clear and simple method of identifying problem gamblers by their behaviour such as expenditure levels or time at venue. However, we have taken the view that a clear statement by a person to the effect that they have a gambling problem can be relied upon.

Research by Delfabbro for Gambling Research Australia [5] noted that gaming venue staff were generally confident in identifying problem gamblers, but didn't know what to do with that information, saying:

"The most significant barrier to identifying problem gamblers was not staff turnover, the length of shifts, or even the size of venues, but the lack of staff training relating to direct interventions with gamblers on the gaming floor. Most staff did not feel confident about how patrons would respond if they were approached. For this reason, there was strong support for the introduction of further training to assist this process."

BetSafe gaming venue staff receive appropriate intervention training in responding to problem gamblers which enables them to identify problem gamblers from their disclosures and know how to respond appropriately. BetSafe will also provide advice to staff and management on the appropriate response to a problem gambler who declines self-exclusion, and whether involuntary exclusion is appropriate.

Case study –involuntary exclusion

J approached the duty manager in a BetSafe club late in the evening and asked to borrow money to catch a taxi home as he had lost all his money gambling on the machines and there was no money in his bank account. The duty manager arranged for a taxi to take J home, paying the taxi by voucher to prevent J gambling the cash. The club involuntarily excluded J to prevent him from further problems. In some jurisdictions such as NSW, there is no legal obligation upon gaming venues to exclude a disclosed problem gambler, so other clubs, hotels and the casino continue to allow known problem gamblers to cause harm to themselves. Only BetSafe clubs take the initiative in this regard. BetSafe approach is consistent with community's concept of "duty of care".

Third party exclusion

Sometimes family members or friends approach gaming venue staff seeking assistance in the imposition of exclusion upon an alleged problem gambler. In these cases, the gaming venue will refer the family members to BetSafe counsellors who investigate the allegations and consider whether the person's gambling is causing serious harm. The person is consulted and a decision may be made to impose an involuntary exclusion where the welfare of the person or a family member is seriously at risk. These third party exclusions are not required by law in most States such as NSW but are required by the ACT Responsible Gambling Code of Practice.

The investigation of a request for third party exclusion requires the family members to provide evidence demonstrating 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 gambles
- Family support children or gambler's partner due to financial neglect by person

BetSafe will ask the family members to provide a statutory declaration. BetSafe will then endeavour to contact the person concerned and give them the opportunity to respond to the allegations. A decision to impose third party exclusion is not made lightly. Many people who make an initial inquiry about third party exclusion decline to follow through, either because they cannot demonstrate the level of potential harm, or because they choose an alternative (such as separating from the problem gambler).

Gaming venues should exercise a duty of care to those patrons they know have a gambling problem. As well as promoting self-exclusion and counselling, gaming venues will also have situations where they should intervene to assist a known problem gambler. BetSafe has successfully provided an involuntary exclusion and third party exclusion program since 1998. Involuntary exclusion applies to patrons who are believed to have a gambling problem but are failing to take action to prevent themselves suffering harm. In such a circumstance it is unconscionable for a gaming venue to simply stand back and watch as people harm themselves. Involuntary exclusion should only apply when there is little doubt that a person

has a gambling problem. Typically a problem gambler will tell gaming staff that they have a gambling problem or disclose the harm that their gambling has caused them. While some problem gamblers object strongly to being excluded, others appreciate the concern that a gaming venue exercises to help them, when they may not be strong enough to help themselves.

Third party exclusion is simply a variety of involuntary exclusion, where the request for exclusion originates with another person. Sometimes a family member or friend of a problem gambler will try to stop the person gambling either verbally or physically in the venue. These family members or friends are referred to BetSafe to make a formal application for third party exclusion. In considering requests for third party exclusion, great care must be exercised by the gaming venue to protect the rights of the individual. While a complaint made by a family member or friend may be well-intentioned, in many cases it is not appropriate to simply accept the request. The third party may be motivated to complain about a person's gambling as a means to embarrass the person, or to protect their expectation of inheritance, or because they consider gambling to be a waste of money. If gambling is not causing someone harm, then there is no reason to impose a third party exclusion. Third party exclusions are rare. In order for a third party complaint to proceed to a third party exclusion, the complainant must establish the following elements:

1. Proof of identity of the complainant and their relationship with the subject of the complaint
2. Provision of evidence supporting the complaint, including a face-to-face interview with the complainant;
3. Confirmation of the complaint, by way of statutory declaration;
4. An opportunity for the subject of the complaint to respond to the allegations before any decision is made.

Many people who inquire about 3rd party exclusion do not proceed to have their family member excluded. The most common reasons why a third party complaint does not proceed to a third party exclusion are:

- the gambler commits to counselling, however decides not to self-exclude
- the complaint is not legitimate (i.e. the person does not actually have a gambling problem – it was made out of spite or some other domestic related issue)
- the family member realises that there is a high likelihood that the gambler may just go elsewhere and gamble
- the family member is concerned about the ramifications of having the gambler excluded
- the family member cannot be bothered going through the procedure to have the gambler excluded
- the third party complaint was not actually a request for the gambler to be excluded, rather a request for advice/assistance.
- the family member is unable to substantiate their claims
- we are unable to contact the family member to offer follow up assistance.

Approximately one eighth of all third party complaints result in a third party exclusion. A further eighth to a quarter of all third party complaints result in a voluntary exclusion – this is because of our focus on working with the family members to a) assist them through counselling; and b) provide them with strategies on how to encourage their family member to seek help voluntarily. We consider the best outcome for a third party complaint to be for the gambler to voluntarily exclude and commit to ongoing counselling.

Case Study – Third Party and Involuntary exclusion

R had a serious gambling problem which caused him to take significant amounts of money from his family to gamble. When he begged his family to pay a debt he owed to a loan shark, the family agreed to pay the loan shark but then asked BetSafe to assist. A number of BetSafe clubs imposed involuntary exclusion upon R who went to great lengths to evade detection, even changing his name. Eventually R was charged with a criminal offence. He realised that he had reached 'rock bottom'. R contacted BetSafe who provided him with counselling and assisted him to overcome his gambling problem. R has succeeded in starting a new life without gambling and acknowledges that the third party exclusion assisted him in reaching the point where he was willing to seek help for his gambling problem.

Ending an exclusion

When a problem gambler signs up for self-exclusion, they have no idea how much time they will need to overcome their gambling problem. The standard period of exclusion may not be long enough. It is therefore sensible to require the individual to provide some evidence that they are able to control their gambling before they are allowed to return to a gambling venue. Unfortunately this is not yet required in most States. Most hotels and clubs in NSW do not undertake any sort of assessment of the individual before allowing them to return to gambling.

. To ensure effective recovery, the BetSafe program provides a re-entry procedure to ensure that problem gamblers who want to return to gamble seriously consider what they are doing before returning to a gambling environment. BetSafe gaming venues require problem gamblers seeking to lift their exclusion to undertake a counselling assessment and provide evidence to show that they have taken steps to manage their gambling problem before they are readmitted. The evidence required may include a letter of support from a spouse or other family member.

This re-entry procedure provides a barrier to a relapse into gambling problems for patrons who may not have adequately dealt with their issues during the exclusion period. It also provides an opportunity to discuss the possibility of a relapse. Some problem gamblers abandon their efforts to re-enter the club when informed about the re-entry requirements. Of those who proceed with their application, about 90% are eventually permitted to return to the gaming venue and very few of these report subsequent problems. Often, if a problem gambler has not rehabilitated, they will go to another club where they don't have a strict readmission procedure in place to gamble.

BetSafe strict re-admission procedure is limited by the fact that a problem gambler can simply go to another gaming venue which does not have the same standards as BetSafe.

Case study – ending self-exclusion

L had self-excluded from her local club a couple of years before and had not gambled since. However, she wanted to visit the club restaurant and shows with a group of friends. The club asked BetSafe to conduct an assessment of L to see if she had overcome her gambling problem. BetSafe interviewed L regarding her motivation to return to the club and her current attitudes to gambling. L provided a letter from her husband stating that he considered that she had overcome her gambling problem and supported her application to re-join the club. BetSafe recommended that the exclusion be lifted and L is now able to attend the club with her friends and enjoy herself without gambling.

Case study –gambler remains excluded from venue

N had originally seen a BetSafe counsellor in 2005 when he discussed gambling strategies and decided he wanted to try controlled gambling. He later agreed to self-exclude saying controlled gambling was 'dismal failure'. In 2008 he contacted BetSafe after he unsuccessfully tried to enter a BetSafe club where he remained excluded. He agreed that he remained addicted to gambling and wanted to return to the club and continue gambling. The counsellor did not support his request to end the self-exclusion and the club board decided not to readmit him. After further discussions with BetSafe he terminated counselling, saying that he would go to the casino and gamble there.

Enforcing exclusions

There is a need for an effective deterrent to enforce exclusions. It is not uncommon for an excluded person to make numerous attempts to re-enter the premises and gamble. This may be because the person wishes to “test the system” but is more likely because the person is struggling with a strong urge to gamble. These repeated breaches of self-exclusion can be harmful for the gambler and also problematic for the gambling venue. Venue staff may have to repeatedly remove problem gamblers who repeatedly breach their exclusion orders.

In the Federal Court case of *Foroughi v Star City* [6], a gambler sued the casino for failing to keep him out on multiple occasions after he had self-excluded. The gambler was eventually unsuccessful, but the case highlights the need for an effective sanction to deter problem gamblers from breaching exclusions.

BetSafe has developed a policy of asking problem gamblers to agree to a sanction at the time they sign their self-exclusion deed. The sanction is that if they breach their self-exclusion they will forfeit any prize they may win. At the time of winning a prize a person must provide identification and is more likely to be identified, particularly if they entered the venue using a disguise.

In practice, it has not been necessary to carry out the forfeiture, because the thought that a prize might be forfeited is enough to discourage most self-excluded patrons from trying to re-enter BetSafe venues. Typically, a patron who wins a prize is asked to attend a meeting with BetSafe where they are reminded of the forfeiture policy and told that on the first occasion they receive a warning and subsequently the prize is forfeited. In this way patrons are made very aware of the deterrent. We consider that the possibility of prize forfeiture is a much more effective deterrent than a fine would be. To avoid suggestions that gaming venues would benefit from the forfeiture, we recommend that clubs give these forfeited prizes to charity.

Case study –breaches of self-exclusion

M changed his name and used disguise to enter a number of clubs from which he was banned to gamble on their multi-terminal gaming machines. He later wrote to the clubs, pointing out that he had breached his exclusion and threatened to sue the clubs for failing to keep him out. NSW clubs and hotels have no sanction provided by law against problem gamblers who try to re-enter the gambling venue in breach of their exclusion. In the case of Star City casino, patrons who repeatedly breach their self-exclusion can be the subject of an involuntary exclusion order under s.84 Casino Control Act (NSW), which results in a fine if they then breach their exclusion.

Residential problem gambling treatment

BetSafe recommends the provision of government support for the establishment of residential programs for problem gamblers, allowing for a stay of between 1 month and 3 months.

Residential gambling treatment has the greatest potential to benefit problem gamblers with co-morbidity issues such as drug or alcohol dependence, and for those who lack a stable home environment.

Most residential programs currently available are quite costly and few problem gamblers are members of health funds or can afford to pay for these directly.

7. Data collection and evaluation

BetSafe keeps detailed data about its counselling and self-exclusion programs. Client data is collected and stored in accordance with privacy regulations.

De-identified data summaries in relation to NSW BetSafe gaming venues is provided to the NSW Office of Liquor Gaming and Racing for their use in research and policy. BetSafe uses its internal data for planning and quality assurance purposes.

One of the issues faced by BetSafe as well as other providers of counselling services is the difficulty in gaining an accurate picture of clients success in controlling their gambling after they have completed their counselling or been readmitted to gambling venues. It seems likely that the former counselling clients and former excluded patrons who have succeeded in overcoming their gambling problems are more willing to provide feedback on their successes than those who are still struggling or have relapsed.

We believe that there is a need for a large-scale national evaluation of counselling and self-exclusion initiatives to enable comparisons to be made between the different program elements. This would provide a basis for the development of a best practice benchmark.

8. Gambling policy research and evaluation

BetSafe supports the national approach to funding significant large-scale research through Gambling Research Australia. Research should focus on the development and evaluation of detailed practical measures to combat problem gambling. Too much research funding continues to be spent on prevalence studies and generalised research. Often research projects conclude with a comment that they provide preliminary results but more research is required to provide practical answers.

References

- [1] Productivity Commission Australia's Gambling Industries p.16.47, Ausinfo 1999
- [2] Global Gaming Guidance Group, see <http://www.gx4.com/>
- [3] Kakavas v Crown Melbourne Limited [2009] VSC 559
- [4] Australian Gaming Council, Current Issues Related to Identifying the Problem Gambler in the Gambling Venue August 2002
- [5] Delfabbro P and others Identifying Problem Gamblers in Venues, Ministerial Council on Gambling 2007
- [6] Foroughi v Star City Pty Limited [2007] FCA 1503

Appendix A – BetSafe member clubs

The BetSafe group was formed in 1998 by a number of large Registered Clubs in New South Wales. The group has since expanded and the BetSafe Responsible Gambling Program now operates in over 40 clubs throughout New South Wales and the Australian Capital Territory.

Founding members

- Bulldogs League Club
- Canterbury-Hurlstone Park RSL Club
- City Tattersalls Club
- Eastern Suburbs Leagues Club
- Merrylands RSL Club
- North Sydney Leagues Club
- Wentworthville Leagues Club

Members

- Bargo Sports Club
- Bay Sports Club, The
- Berkeley Sports & Social Club
- Blacktown Workers Club
- Blacktown Workers Sports Club
- Campsie RSL Club
- Canberra City Labor Club
- Canberra Labor Club
- Club Umina
- DOOLEYS Lidcombe Catholic Club
- DOOLEYS Regents Park Sports Club
- DOOLEYS Silverwater Club
- Earlwood Ex-Servicemen's Club
- Ginninderra Labor Club
- Grosvenor Club
- Harbord Diggers Memorial Club
- Juniors @ the Junction
- Kingswood Sports Club
- Lakemba Services Memorial Club
- Manly Bowling Club
- Mosman Returned Servicemen's Club
- Mounties Bowling Club
- Mt Pritchard and District Community Club
- North Sydney Leagues Bowling Club
- Rooty Hill RSL Club
- Seagulls Club
- South Sydney Junior Rugby League Club
- Souths Juniors Bowling Club
- St Johns Park Bowling Club
- TIGERS Five Dock
- TIGERS Sydney Markets
- Tuncurry Bowling Club
- Waverley Bowling Club
- Wentworthville Leagues Bowling Club
- Weston Creek Labor Club
- Workers Parramatta

Appendix B – Feedback from secondary school education module

Paul Forrester, Campus Director at Trinity Catholic College said the following in relation to the module:

In 2011 our College was fortunate to have the opportunity to work with DOOLEYS and BetSafe in developing a fantastic safe gambling presentation for young people. It is not often in schools where you get the opportunity to work so closely with external organisations with the aim of providing quality education on social issues for students.

BetSafe and DOOLEYS were committed to providing the best education on safe gambling possible and were flexible and open in our discussions. They really listened to what we believed was important in regards to content and delivery and produced a high quality presentation that clearly impacted upon our students.

Our students responded positively to the presentation, making such comments as; “it was very valuable and eye-opening”, “I learnt a lot of things which I didn’t know before this presentation.” 96% of students said that as a result of the presentation they could identify signs of gambling and 82% of students said they believed they would know what to do if someone close to them had a gambling problem. Importantly, 83% of students believed that it was not easy to make money from gambling.

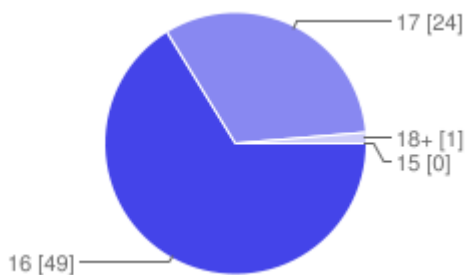
Our College could not be happier with the process in the development, and the overall final delivery, of the presentation. Daniel, from BetSafe, was an effective and dynamic communicator to young people and was able to engage with the audience from the beginning. We look forward to working with DOOLEYS and BetSafe in the future to continue to provide the very best education on important social issues that we can.

Following is a summary of the feedback from the students who participated in the module:

74 responses

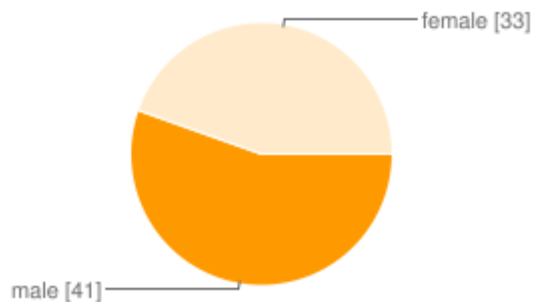
Summary [See complete responses](#)

How old are you?



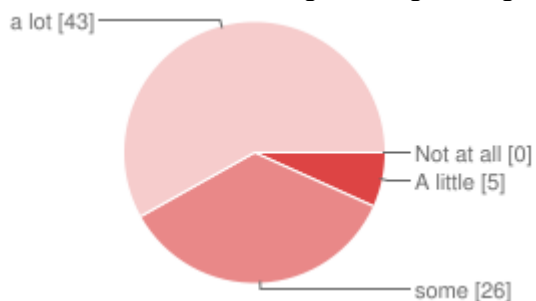
15	0	0%
16	49	66%
17	24	32%
18+	1	1%

Are you male or female



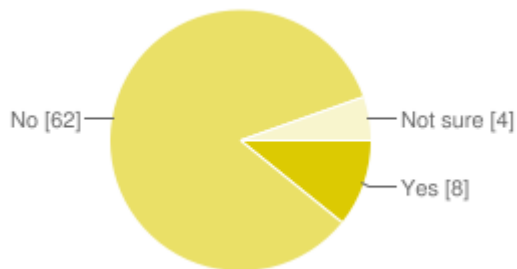
male	41	55%
female	33	45%

Do you have a better understanding of how gambling works after the presentation



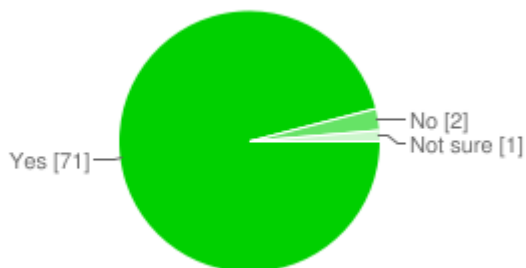
Not at all	0	0%
A little	5	7%
some	26	35%
a lot	43	58%

Do you think it easy to make money from gambling?



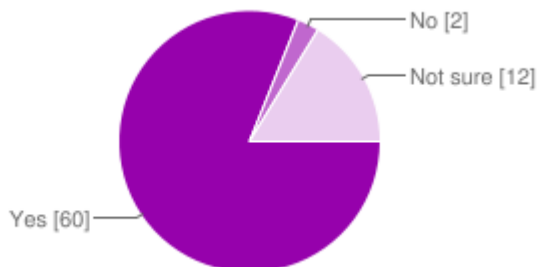
Yes	8	11%
No	62	84%
Not sure	4	5%

Do you know some signs of gambling?



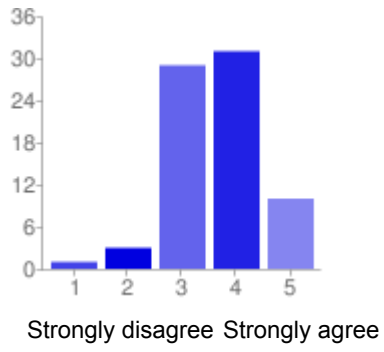
Yes	71	96%
No	2	3%
Not sure	1	1%

Would you know what to do if someone close to you had a gambling problem?



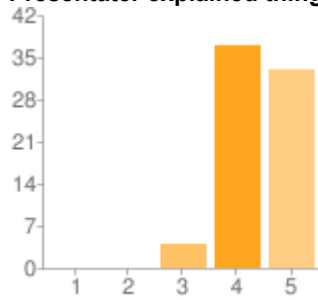
Yes	60	81%
No	2	3%
Not sure	12	16%

The gambling presentation was interesting



1 -Strongly disagree	1	1%
2	3	4%
3	29	39%
4	31	42%
5 -Strongly agree	10	14%

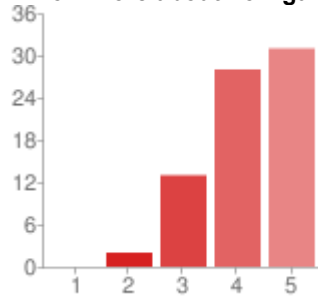
Presentater explained things clearly



1 -Strongly disagree	0	0%
2	0	0%
3	4	5%
4	37	50%
5 -Strongly agree	33	45%

Strongly disagree Strongly agree

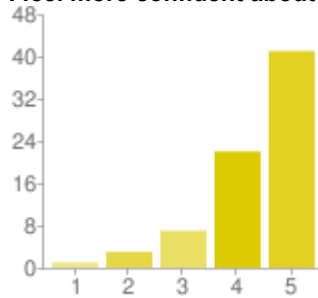
I know more about how gambling works now



1 -Strongly disagree	0	0%
2	2	3%
3	13	18%
4	28	38%
5 -Strongly agree	31	42%

Strongly disagree Strongly agree

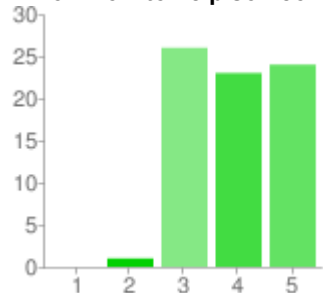
I feel more confident about choosing whether or not I want to gamble



1 -Strongly disagree	1	1%
2	3	4%
3	7	9%
4	22	30%
5 -Strongly agree	41	55%

Strongly disagree Strongly agree

I know how to help someone with a gambling problem



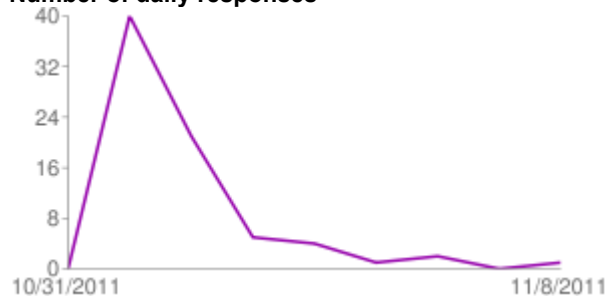
1 -Strongly disagree	0	0%
2	1	1%
3	26	35%
4	23	31%
5 -Strongly agree	24	32%

Strongly disagree Strongly agree

Please add any further comment you may have on the gambling presentation

No Comment. Very Helpful It was very helpful, but it would be more interesting if there were more clips, interactions and stories involved :) This presentation was highly productive as to how gambling is and the outcomes behind it. I learnt a lot of things which I didn't know before this presentation. It was very valuable and eye-opening. it was a good time filler :) Try and make it more interesting and engaging. The presentation on the screen could have been made more engaging and interesting with various graphics. The video shown did indeed show the effects of gambling however it felt as though i ...

Number of daily responses



Appendix C – Exclusion statistics

BetSafe provides a comprehensive and effective exclusion program that is one of Australia's longest running and exceeds comparable programs in many respects. The following table illustrates the effectiveness of BetSafe exclusion program in comparison to other similar programs provided in NSW. To put these statistics in context BetSafe operates exclusion programs at 43 venues, compared to Clubsafe (ClubsNSW) and the Gamecare (AHA) who both operate programs at in excess of 1,000 venues each (estimate).

Table E.1 Exclusion agreements

State	Venue(s)	Year of data	Exclusion agreements Number
NSW	Star City Casino	2006-07	1962
	BetSafe (NSW, and ACT)	2009	1855
	GameCare (AHA NSW)	2009	934
	ClubSafe	2009	1000 (est) ^b
	BetCare (wagering)		
VIC	Crown Casino	2002	860
	Hotels and clubs and pubs (AHA Vic)	2009	1830
	BetCare (wagering)		
QLD	Conrad Treasury Casino (Brisbane), Conrad Jupiter's Casino (Gold Coast), Jupiter's Townsville Hotel and Casino, Sofitel Reef Casino (Cairns)	2009	788
	Clubs and hotels	2009	2385
SA	SkyCity Casino (Adelaide)	2002	288
	Clubs and Hotel self-exclusions and licensee-initiated exclusions made under the SA Gaming Machines Act (administered by the OLGC)	2009	605 ^c
	Self barrings made through the IGA one-stop shop program)	2008	804
WA	Burswood Casino	2002	452
TAS	Wrest Point Casino	2002	200
	Country Club Casino (Launceston)	2002	126
	Clubs and Hotels		–
	Clubs and Hotels (Tasmanian Gambling Exclusion Scheme) ^c	2007	282
NT	SkyCity Casino (Darwin)	2009	36
	Lasseters Hotel Casino (Alice Springs)	2009	24
	Clubs and Hotels		–
ACT	Casino Canberra	2009	171
	Clubs and Hotels		–
Total			14 602^a

^a Our estimate of the number of self-exclusions from casinos (4907) differs from the estimate made by Allens Consulting in their attachment to the Australasian Casinos Association submission (sub 214). They identified 16 000 self-exclusions in Australian casinos in 2008 (p. 55 of *Casinos and the Australian Economy*, attachment to sub. 214). However, this estimate includes involuntary exclusions — which, based on numbers published in NSW and Victoria (NSW Casino Control Annual Report 2006-07), would make up more than half of all exclusions. It may also include agreements that have lapsed or been revoked. ^b This is a 'best guess' estimate provided by ClubsNSW. ^c This figure includes self barrings (the majority) and licensee-initiated barrings (where the licensee believes the person or the person's dependants are suffering harm because of excessive play).

Sources: Information requests from the various Australian Hotels Associations, various Club associations, from BetSafe, and from the various State and Territory Regulators; SACES (2003); and SA Centre For Economic Studies (SACES) (2008), *Social and Economic Impact Study into Gambling in Tasmania*, vol. 1, Final Report, commissioned by the Tasmanian Department of Finance and Treasury, p. 189; Information provided by the ACT Treasury.

Table E.1 of the recent 2010 Productivity Commission report