

The Responsible Gambling Code in Queensland, Australia: Implementation and Venue Assessment

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Abstract

In Australia, the state of Queensland introduced a voluntary *Responsible Gambling Code of Practice* in 2002. This investigation examines levels of implementation and perceptions of adequacy of the Code in casinos, hotels and licensed clubs in three Queensland regions. It involved on-site inspections of 30 venues and semi-structured interviews with 35 venue managers and staff. The level of implementation varied but most venues had implemented between 40 and 60 percent of the Code's practices. Managers' perceptions of the adequacy of the Code's practices revealed that some practices, such as physical layout of the venue, were considered much more effective than others, such as the provision of information and signage.

Key words: responsible gambling, code of practice

Introduction

Gambling in Australia has become a major industry, providing significant benefits for individuals, organisations, communities and governments. However, the existence of problem gambling has also resulted in substantial costs for stakeholders (Korn and Shaffer, 1999). From a public health perspective, the costs associated with gambling problems include the more obvious, such as treatment programs, impaired work performance, family breakdown and gambling related crime. They also include the opportunity costs of the time and money spent gambling, by both 'problem' and 'non-problem' gamblers. These opportunity costs may include time not spent in family interaction or at social events or other leisure pursuits (Walker, 1998), and money not directed to household items, family needs or household savings (Livingstone, 1999).

It is estimated that approximately 2.1 percent of adult Australians have either 'severe' or 'moderate' problems with gambling (Productivity Commission, 1999). Individual problem gamblers suffer, but they also impact on family and friends and may also require certain public services in order to deal with their problems. In an attempt to minimise the impacts from problem gambling, to encourage more responsible gambling and to provide improved consumer protection, various governments and gambling providers in Australia have introduced responsible gambling codes of practice. In June 2002, the Queensland Government introduced a voluntary *Responsible Gambling Code of Practice* for all gambling providers in that state. This paper reports on an investigation into the level of implementation of the Code's practices in casinos, hotels and licensed clubs in three regions within the state of Queensland. The study also examined the perceptions and attitudes of managers and staff towards various aspects of the Code's adequacy. The study was undertaken in Longreach, Townsville and south-

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east Queensland and involved on-site inspections of 30 venues and qualitative data gathered from semi-structured interviews with 35 managers and staff from these venues.

Problem Gambling

Despite the existence of problem gambling, there have been on-going difficulties with finding a widely accepted definition. Differences in definition are important because they impact on solutions provided to overcome the problem. The Productivity Commission (1999) included a range of definitions of problem gambling that variously emphasised either symptoms (e.g., loss of control, chasing debts) or effects (e.g., disruption and damage to personal, family or work life). One widely accepted definition is that adopted by the Victorian Casino and Gaming Authority (VCGA) which states that problem gambling occurs 'where a person's gambling activity gives rise to harm to the individual player, and/or to his or her family, and may extend into the community' (Australian Institute for Gambling Research [AIGR], 1997).

As might be expected where definitional issues remain, there are differing estimates of the extent of gambling problems within the community. The most widely used estimates for Australia are those derived by the Productivity Commission (1999). The Commission estimated that approximately 1 percent of the adult Australian population (around 130,000 people) had 'severe problems' with gambling, while an additional 1.1 percent (160,000) had 'moderate problems', making a pool of approximately 290,000 'problem gamblers' (Productivity Commission, 1999).

The Commission (1999) further found that, for each person experiencing problem gambling, at least five others in the community (family, friends and work colleagues) were likely to be affected, making the number of people affected by problem gambling at least 1,450,000 nationally. Problem gamblers comprised 15 percent of regular, non-lottery gamblers but accounted for approximately 30 percent of gambling industry revenue, losing on average around \$12,000 per head, per year (Productivity Commission, 1999). The Productivity Commission (1999) applied the Australian interpretation of the SOGS screening instrument (South Oaks Gambling Screen) and acknowledged that the resulting figures probably underestimate the extent of the problem.

Responsible Gambling

Despite being widely used, the terms 'responsible gambling' and 'responsible provision of gambling' are also poorly defined. Dickerson (1998) noted that they are generally used to refer to a collection of operator practices that aim to reduce harm. Such practices include those identified by the Productivity Commission (1999), including information about the price and nature of gambling products, information about the risks of problem gambling, controls on advertising, controls on the availability of ATMs and credit, and self-exclusion options. The introduction of such practices in responsible gambling programs in Australia recognises that, as gambling is a legalised activity, with known risks, a duty of care accrues to legislators and providers to minimise harm to the public (Michaleas, 2000). Moreover, most experts in Australia have now rejected medical and addiction interpretations of problem gambling to redefine it as a social and public health issue. This has shifted responsibility for addressing problem gambling from individual gamblers, to also include gambling providers and regulators to enact structural changes for improved harm minimisation in gambling.

Harm minimisation aims to reduce the risk and severity of adverse consequences associated with using a product, without necessarily reducing that use *per se* (Plant, Single and Stockwell, 1997, p. 3-4). The aim is not to achieve some ideal usage level, but to implement preventative measures that reduce the chances of adverse outcomes (Plant, et al. 1997, p. 7). Further, *The National Drug Strategy* in Australia popularised a

public health vocabulary that is now being applied to other areas, including problem gambling. Three key approaches were emphasised—demand reduction, supply control, and harm reduction. While aspects of each of these approaches can be seen in the various mandatory and voluntary responses to problem gambling, most responsible gambling programs and codes of practice in Australia focus on harm reduction.

In addition to harm minimisation, responsible gambling has also been interpreted to include informed consent, a key principle underpinning consumer protection. For example, Dickerson (1998) suggests that by applying the principle of ‘informed consent’, responsible gambling needs to ensure that consumers are at least:

- Informed about all the relevant processes involved in the form of gambling;
- Making a genuine choice, with other options available to them; and
- Not making the decision to gamble under conditions of strong emotion or personal crisis.

Responsible provision of gambling also implies that gambling is provided in a socially responsible way, one which is responsive to community concerns and expectations. For example, Hing (2003) has noted that responsible provision of gambling involves providing gambling in a manner that meets a community’s economic, legal, ethical and philanthropic expectations at a given point in time.

These three principles commonly associated with responsible gambling and responsible provision of gambling—harm minimisation, informed consent and social responsibility and responsiveness—are recognised in *The Queensland Responsible Gambling Strategy* (2002a, p. 3), which defines responsible gambling as:

‘occur(ring) in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership by individuals, communities, the gambling industry and Government to achieve outcomes that are socially responsible and responsive to community concerns.’

In addition to difficulties in defining key terms and principles, responsible gambling codes of practice also face the challenge of being embraced and effectively implemented, particularly where such codes are voluntary and self-governing, as is the case in Queensland. In comparing existing responsible gambling codes with codes developed for other industries, Doherty (1999) suggested that, to be effective, responsible gambling codes required the following:

- Explicit industry commitment - with clear objectives, expectations and ground rules;
- Involvement of front-line staff - with appropriate, regular training given to the gambling sector’s highly casualised workforce;
- A sound institutional base for developing and implementing the code - including enforcement and compliance;
- Clear and relevant incentives for voluntary compliance - and clear negative consequences for failure to comply;
- Community confidence - gained through open processes in development and implementation, and transparency in operation;
- Regular flow of information - about how the code is working and the response to it;
- Extensive publicity - both for the code and for its complaints measures; and
- Regular reviews - to ensure the code is meeting community expectations.

A lack of mechanisms for reporting, evaluation and compliance was noted in the responsible gambling codes in existence at the time (Doherty, 1999). This view was supported by the findings of the Productivity Commission (1999) and Hing, Dickerson

and Mackellar (2001) in their audit of 30 voluntary responsible gambling codes operating in Australia. Given this deficiency, it appeared instructive to assess how widely a voluntary code – in this case in Queensland – has been embraced by gambling providers.

Queensland's Approach to Responsible Gambling

Prior to June 2002, the Queensland Acts and associated regulations relating to casinos and machine gaming went little beyond the usual minimum requirements relating to minors, staff gambling, credit betting and allowing self-exclusion. A \$5 maximum bet on gaming machines and limits on machine numbers (280 per registered club and 35 per hotel) were included. The legislation also provided for imposed exclusion from playing gaming machines for one month where there are reasonable grounds for a licensee to believe that the peace and happiness of a person's family were endangered due to excessive playing.

The *Policy Direction for Gambling in Queensland* (Queensland Government, 2000) highlighted the need for a unified strategy to address social concerns related to the rapid expansion of gambling. The policy emphasised better responsiveness to community concerns, including in the area of responsible gambling. Accordingly, the *Queensland Responsible Gambling Strategy* (Queensland Treasury, 2002a) was released on 27 February 2002 and encompassed a range of initiatives for achieving its 'overarching objective, to minimise the harmful impacts of problem gambling'. Six priority action areas were identified as:

- Enhancing responsible gambling policies and programs through research;
- Increasing community knowledge and awareness of the impacts of gambling;
- Reducing risk factors for problem gambling through early intervention;
- Developing a statewide system of problem gambling treatment and support services;
- Ensuring gambling environments are safer and more supportive for consumers; and
- Promoting partnerships to address statewide and local gambling issues and concerns.

To address the fifth priority area above, the Queensland Responsible Gambling Advisory Committee (QRGAC) developed the *Queensland Responsible Gambling Code of Practice*, the subject of this research. The QRGAC had its genesis as the Problem Gambling Advisory Committee, formed in August 1996, 'with the aim of providing a community, industry and government forum to monitor the impact of problem gambling in Queensland' (QRGAC, 2001). It is a tripartite alliance of community, industry and government which has advised the Queensland Government on projects including the Gambling Help-Line Pilot Project, the Queensland Review of Gaming, and the development of responsible gambling curriculum modules for secondary school students (QRGAC, 2001).

In developing the *Queensland Responsible Gambling Code of Practice* (Queensland Treasury, 2002b), the Responsible Gambling Advisory Committee undertook extensive community and industry consultation, with a draft released for public consultation between December 2000 and March 2001. Following further refinements, the Code was launched on 29 May 2002. It commits gambling providers to a range of practices in six broad areas, related to the provision of information; interaction with customers and community; exclusion provisions; physical environments; financial transactions; and advertising and promotions. Within each category there are different elements that venues need to implement in order to fully introduce each practice. The number of elements range from four in the exclusions practice to 12 in the advertising practice, as shown in Table 1.

Table 1: Summary of the Queensland Responsible Gambling Code of Practice

- 1. Provision of Information:**

Each venue to provide information so customers can make informed decisions about their gambling.

 - 1.1 A responsible gambling mission statement is clearly displayed.
 - 1.2 Information about gambling risks and where to get help is displayed in all gambling areas and money change areas.
 - 1.3 The following information is available on request: the Responsible Gambling Policy document; nature and rules of games, returns to players; exclusion provisions; complaints mechanisms; financial transaction practices.
 - 1.4 Information on the odds of winning major prizes is displayed in all gambling areas.
- 2. Interaction with customers and community**
 - 2.1 Community liaison: Gambling providers are to establish effective mechanisms with local gambling-related support services, and local community consultative networks.
 - 2.2 Venue to have a customer liaison person trained to provide information to customers with gambling-related problems; to support staff with those customers; and provide help to staff with gambling-related problems.
 - 2.3 Establish a mechanism for recognising and addressing complaints.
 - 2.4 Training and skills development: Appropriate and ongoing responsible gambling training is provided to gaming staff. Owners, boards and managers receive information to guide responsible gambling decision making.
- 3. Exclusion provisions**
 - 3.1 Gambling providers to provide self-exclusion procedures and supporting documentation.
 - 3.2 Gambling providers offer customers who seek self-exclusion contact information about counselling agencies.
 - 3.3 Self-excluded gambling customers are to be given support for consensual exclusions from other gambling venues.
 - 3.4 Gambling providers are not to send correspondence or promotional material to excluded gambling customers.
- 4. Physical environments**
 - 4.1 Minors are prohibited from gambling.
 - 4.2 Minors are excluded from areas where adults are gambling.
 - 4.3 Service of alcohol is managed in such a way as to encourage customers to take breaks in play.
 - 4.4 Customers who are intoxicated are not permitted to continue gambling.
 - 4.5 Where child care facilities are provided they must be safe and in accordance with relevant child care legislation.
 - 4.6 Staff working in gambling areas are not to encourage gambling customers to give them gratuities.
 - 4.7 Gambling providers implement practices to ensure customers are made aware of the passage of time.
 - 4.8 Gambling providers ensure customers are discouraged from extended, intensive and repetitive play.
- 5. Financial transactions**
 - 5.1 ATMs are not to be located in close proximity to gambling areas or in the entry to gambling areas.
 - 5.2 Gambling providers are to establish a limit above which all winnings are paid by cheque of electronic transfer; gambling winnings above the set limit are paid by cheque and are not cashed on the gambling provider's premises until the next trading day; cheques can only be cashed by prior arrangement.
 - 5.3 Gambling providers are not to provide credit or lend money for gambling.
- 6. Advertising** **Gambling providers are to ensure that advertising and promotions are responsible,** with consideration for people adversely affected by gambling. These strategies will ensure that any advertising or promotion:
 - 6.1 Complies with the Advertising Code of Ethics as adopted by the Aust. Ass. of National Advertisers;
 - 6.2 Is not false, misleading or deceptive;
 - 6.3 Does not implicitly or explicitly misrepresent the probability of winning a prize;
 - 6.4 Does not give the impression that gambling is a reasonable strategy for financial betterment;
 - 6.5 Does not include misleading statements about odds, prizes or chances of winning;
 - 6.6 Does not offend prevailing community standards;
 - 6.7 Does not focus exclusively on gambling, where there are other activities to promote;
 - 6.8 Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups;
 - 6.9 Does not involve any external signs advising of winnings paid;
 - 6.10 Does not involve any irresponsible trading practices by the gambling provider;
 - 6.11 Does not depict or promote the consumption of alcohol while engaged in the activity of gambling;
 - 6.12 Has the consent of the person prior to publishing anything which identifies a person who has won a prize.

Source: *Queensland Responsible Gambling Code of Practice: Trial and Review (2002b)*

The Study and Methodology

This paper reports on the findings from a project that examined the extent to which the *Queensland Responsible Gambling Code of Practice* has been implemented in casinos, hotels and licensed clubs. In addition, the project sought to assess gambling venue managers' and staff perceptions of the potential effectiveness of the various aspects of the Code. From these findings, various facilitators and impediments to the implementation of the Code have been identified.

There are 11 statistical divisions in Queensland, but due to budgetary and time constraints, gambling operators in only three divisions were included in the sample. Three divisions were chosen to provide a cross-section of regional views (from outback Queensland, far-north Queensland and the heavily populated south-east Queensland regions) regarding the implementation and perceived adequacy of the *Queensland Responsible Gambling Code of Practice*. The outback was represented by Longreach, far-north Queensland was represented by Townsville and south-east Queensland was represented by the Gold Coast.

Six hotels, six licensed clubs and one casino were needed in each location for an appropriate research sample to ensure an adequate cross-section of gambling industry views. However, Longreach had no casino and only five venues with gambling facilities, so all of these were included.

To ensure an appropriate cross-section of views from venues of different size, venues with a large number of gaming installations and those with a small number of gaming installations were needed in the sample. For this study, venues having 25 gaming machines or less were classified as 'small' venues, while venues with more than 25 gaming machines were classified as 'large' venues. Betting on Totaliser Agency Boards (TAB) and Keno facilities was also available in most of the selected venues. Thus, in each of the three regions, of the six hotels selected, three had large gaming facilities and three had small gaming facilities. Of the six licensed clubs selected, three had large gaming facilities and three had small gaming facilities. The casinos all had large gaming facilities. All five venues in Longreach had small gaming facilities.

With assistance of the QOGR, a list was produced of licensed venues (clubs, hotels and casinos) and their gambling facilities for Townsville and south-east Queensland. With further help from Clubs Queensland and the Queensland Hotels Association, venues belonging to these industry associations were selected from this list as examples of best practices in implementing the voluntary Code. These venues were included to provide a benchmark of best practices for comparison with other venues. From this list, every second venue was asked to participate in the research, depending on the size of its gaming installation. The exception was Longreach where every venue was asked to take part. In total, thirty-nine venues were asked to participate and thirty venues agreed.

The degree of compliance with the code was established by the researchers, who toured each venue with managers or staff, who identified the 'visible' consumer protection and harm minimisation measures accessible to gamblers (e.g., provision of information and signage; physical environment and layout). These were noted by the researchers. Additional evidence on compliance was obtained by examining local newspapers, venue newsletters and a variety of venue print materials to ascertain the style of advertisements, messages or themes highlighted, and space allocation for different venue products.

Finally, the collection of data on implementation was aided by a tick-box style questionnaire that reflected each of the elements of the code. A copy of this protocol is found at Figure 1. Managers and staff were asked during the interviews if each element of the Code had been implemented or not. These notes were compared to the observations of the researchers, and all data were composed and transcribed later that day.

This paper examined the extent to which the *Queensland Responsible Gambling Code of Practice* has been implemented in casinos, hotels and licensed clubs.

Figure 1: Interview Schedule – Implementation

The overall purpose of this interview today is to ask you about the current responsible gambling practices in QLD hotels, casinos, and registered and licensed clubs in minimising harm and protecting consumers in their gambling.

✓ = YES X = NO	Gaming Areas	Keno Areas	Wagering Areas	Comments
1. Provision of information				
1.1 Responsible gambling mission statement displayed				
1.2 Information on help displayed in all gambling areas near ATM and EFTPOS servicing gambling areas and in toilets				
1.3 Information is displayed on: The responsible gambling policy document Explaining rules of play and odds of winning Exclusion provisions Gambling related complaints resolution Financial transaction practices				
1.4 Odds of winning major prizes displayed				
2. Interaction with customers and community				
2.1 Establish effective links with gambling related support services and community networks				
2.2 Customer liaison role to Provide information to customers Support staff in providing assistance Provide assistance to staff with gambling problems				
2.3 Customer complaints mechanisms are established and promoted				
2.4 Training & skills development to ensure RG training Is provided to relevant staff Owners boards & managers				
3. Exclusion provisions				
3.1 Provide self-exclusion procedures and documentation				
3.2 Offers customers seeking self-exclusion information				
3.3 Self-excluded customers given support in seeking mutual exclusion				
3.4 Do not send correspondence to excluded customers or on request				
4. Physical Environment				
4.1 Minors prohibited from gambling				
4.2 Minors excluded from areas where adults are gambling				
4.3 Alcohol service encourage customers to take breaks in play				
4.4 Intoxicated customers not permitted to continue to gamble				
4.5 Childcare facilities				
4.6 Staff in gambling areas not to encourage tips				
4.7 Customers are made aware of the passage of time				
4.8 Customers discouraged from extended, intensive and repetitive play				
5. Financial Transactions				
5.1 ATM facilities not located close to entry of gambling areas				
5.2 Limit above which all winnings are paid by cheque or EFT and not cashed at the venue until the next day Prohibits cashing cheques not payable to the venue Prohibits paying cheques not payable to the person presenting Prohibits cashing multiple cheques				
5.3 Does not provide credit or lend money for gambling				
6. Advertising and promotions				
6.1 Complies with advertising code of ethics by AANA				
6.2 Is not false, misleading or deceptive				
6.3 Does not misrepresent the probability of winning a prize				
6.4 Does not give the impression that gambling is a betterment strategy				
6.5 No misleading statements about odds, prizes, or chances of winning				
6.6 Does not offend prevailing community standards				
6.7 Does not focus exclusively on gambling				
6.8 Is not directed at minors or vulnerable or disadvantaged groups				
6.9 Does not involve any external signs advising of winnings paid				
6.10 Does not involve irresponsible trading practices				
6.11 Does not depict or promote alcohol consumption with gambling				
6.12 Obtains consent to publish the ID of a prize winner				

Typically, only the general manager/owner of small venues was interviewed. In larger venues such as the casinos, discussions were held with the general manager and the gaming or responsible gambling manager.

Findings

Implementation of the Code

Tables 2 to 4 illustrate the level of compliance with the Code by the 30 venues examined in this research. The tables show the percentage of compliance calculated for each of the six elements. For example, within the practice area, provision of information, there are ten possible elements for venues to comply with and implement. It can be seen in Table 2 that Venue 1 has complied with 40%, or four of the ten, elements. In some cases, an element is not applicable to a particular venue. For example, Venue 1 does not send promotional material to its patrons; therefore the fourth element in the exclusion practice area (gambling providers are not to send correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent) does not apply to this venue. In this situation, the percentage compliance with this practice is calculated by comparing the number of elements complied with against the total number of elements applicable to the venue (not the total number of elements in the Code). For example, in the case of Venue 3, there is a 33% compliance rate with the exclusion practice not 25% because the venue does not undertake any advertising or promotions. The final column has the percentage of total elements implemented across each area of the code. The total numbers column indicates first the number of elements implemented and secondly the number of elements that are not applicable to the particular venue. For example, Venue 1 has complied with 14 elements, but had another 14 elements that were not applicable and were therefore left out when calculating the percentage of compliance.

On average, the venues in this study had implemented 72% of the elements in the six major practice areas. Clearly, the most commonly implemented elements were those that centred on the practice area of advertising. Ten venues indicated that they did not undertake any advertising. The other 20 venues that did advertise reported that their advertising was responsible and adhered to all relevant aspects of the Code, resulting in 100% compliance with this practice. However, there are two qualifiers that should be noted. The first is that the researchers did not conduct an independent evaluation of the advertising practices in the venues, but relied on self-reported data from the interviewees. As such, the researchers cannot verify these self-reported levels of compliance with the practices in the Code relating to advertising. Second, a number of managers and staff stated that other venues were not being responsible in their advertising practices, with several examples cited. Indeed, the researchers did encounter such breaches of the Code in their investigation, including some by venues who participated in the study and who nevertheless reported compliance with the Code's advertising practices.

On average, the venues in this study had implemented 72% of the elements in the six major practice areas.

Table 2 Regional Location and Compliance with the Code

Venue	Information	Interaction	Exclusion	Environment	Financial Transactions	Advertising	Total	
No of items	10	8	4	8	6	12	48	48
%	%	%	%	%	%	No.	%	
1	40	12	0	71	67	-	14/14	41
2	40	0	0	86	67	-	14/14	41
3	50	25	33	86	67	-	18/14	53
4	30	25	67	100	67	-	18/14	53
AV. LONGREACH	40	16	25	86	67	-		47
5	50	50	50	75	100	-	23/12	64
6	0	0	25	63	67	-	10/12	28
7	80	63	100	63	100	100	40	83
8	100	100	100	100	100	100	48	100
9	80	75	100	88	100	100	43	90
10	90	75	100	88	100	100	44	92
11	90	88	75	63	100	100	42	88
12	70	12	50	63	67	100	31/1	66
13	40	100	25	88	100	100	38	79
14	80	100	100	88	100	100	45	94
15	40	88	100	75	100	100	39	81
16	100	100	75	88	100	100	46	96
17	40	63	25	75	83	-	21/12	58
18	30	75	75	88	83	100	36	75
AV. SEQLD	64	71	71	79	93	100		78
19	50	38	75	86	100	-	23/13	66
20	60	100	100	57	83	100	39/1	83
21	40	63	50	71	100	100	34/1	72
22	30	0	33	86	50	-	13/14	38
23	30	0	0	71	83	-	13/14	38
24	20	0	0	71	67	-	11/14	32
25	90	75	67	100	83	100	41/2	91
26	80	100	100	63	83	100	42	88
27	80	100	100	100	83	100	44/1	94
28	90	100	100	63	67	100	42	88
29	90	100	75	71	83	100	42/1	89
30	90	100	100	100	83	100	45/1	96
AV. TOWNSVILLE	63	65	67	78	74	100		73
AV. ALL	60	61	63	80	84	100		72

Table 3 Venue Size and Compliance with the Code

Venue ID	Information	Interaction	Exclusion	Environment	Financial Transactions	Advertising	Total	
No. of items	10	8	4	8	6	12	48	48
%	%	%	%	%	%	No.	%	
1	40	12	0	71	67	-	14/14	41
2	40	0	0	86	67	-	14/14	41
3	50	25	33	86	67	-	18/14	53
4	30	25	67	100	67	-	18/14	53
5	50	50	50	75	100	-	23/12	64
6	0	0	25	63	67	-	10/12	28
12	70	12	50	63	67	100	31/1	66
13	40	100	25	88	100	100	38	79
16	100	100	75	88	100	100	46	96
17	40	63	25	75	83	-	21/12	58
18	30	75	75	88	83	100	36	75
19	50	38	75	86	100	-	23/13	66
22	30	0	33	86	50	-	13/14	38
24	20	0	0	71	67	-	11/14	32
AV. SMALL	42	36	38	80	77	100		56
7	80	63	100	63	100	100	40	83
8	100	100	100	100	100	100	48	100
9	80	75	100	88	100	100	43	90
10	90	75	100	88	100	100	44	92
11	90	88	75	63	100	100	42	88
14	80	100	100	88	100	100	45	94
15	40	88	100	75	100	100	39	81
20	60	100	100	57	83	100	39/1	83
21	40	63	50	71	100	100	34/1	72
23	30	0	0	71	83	-	13/14	38
25	90	75	67	100	83	100	41/2	91
26	80	100	100	63	83	100	42	88
27	80	100	100	100	83	100	44/1	94
28	90	100	100	63	67	100	42	88
29	90	100	75	71	83	100	42/1	89
30	90	100	100	100	83	100	45/1	96
AV. LARGE	76	83	85	79	91	100		85
AV. ALL	60	61	63	80	84	100		74

Table 4 Venue Type and Compliance with the Code

Venue ID	Information	Interaction	Exclusion	Environment	Financial Transactions	Advertising	Total	
	10	8	4	8	6	12	48	48
%	%	%	%	%	%	%	%	
1	40	12	0	71	67	-	14/14	41
3	50	25	33	86	67	-	18/14	53
4	30	25	67	100	67	-	18/14	53
7	80	63	100	63	100	100	40	83
10	90	75	100	88	100	100	44	92
12	70	12	50	63	67	100	31/1	66
14	80	100	100	88	100	100	45	94
16	100	100	75	88	100	100	46	96
17	40	63	25	75	83	-	21/12	58
18	30	75	75	88	83	100	36	75
19	50	38	75	86	100	-	23/13	66
20	60	100	100	57	83	100	39/1	83
22	30	0	33	86	50	-	13/14	38
23	30	0	0	71	83	-	13/14	38
24	20	0	0	71	67	-	11/14	32
28	90	100	100	63	67	100	42	88
29	90	100	75	71	83	100	42/1	89
AV. HOTELS	58	52	59	77	80	100		67
2	40	0	0	86	67	-	14/14	41
5	50	50	50	75	100	-	23/12	64
6	0	0	25	63	67	-	10/12	28
9	80	75	100	88	100	100	43	90
11	90	88	75	63	100	100	42	88
13	40	100	25	88	100	100	38	79
15	40	88	100	75	100	100	39	81
21	40	63	50	71	100	100	34/1	72
25	90	75	67	100	83	100	41/2	91
26	80	100	100	63	83	100	42	88
30	90	100	100	100	83	100	45/1	96
AV. CLUBS	58	67	63	79	89	100		74
8	100	100	100	100	100	100	48	100
27	80	100	100	100	83	100	44/1	94
AV. CASINOS	90	100	100	100	92	100		97
AV. ALL	60	61	63	80	84	100		74

In descending order, the next most complied with practice areas were financial transactions (an average of 85%) and physical environments (an average of 80%). The remaining three practice areas had lower levels of compliance. For example, there was an average of 63% compliance with exclusion provisions, an average of 61% compliance with the practice area, interaction with customers and the community, followed by an average of 60% compliance with the elements in the practice area, provision of information.

Regional Location and Compliance with the Code

Table 2 also illustrates important regional differences in the level of compliance with the Code's practice areas. In Longreach, the average level of compliance with all the elements in the Code was 47% compared to an average of 73% in Townsville and 78% in south-east Queensland. The compliance rate in south-east Queensland, in comparison with Townsville, is enhanced by the fact that the south-east Queensland sample included four more small venues than the Townsville sample. As will be shown in Table 3, small venues are much less likely to have complied with the practices in the Code than large venues. Given the difference in the level of compliance between large and small venues, it appears that the compliance rate in south-east Queensland is even more positive than in Townsville, after taking the size of the venues in the respective samples into consideration.

The other interesting pattern to emerge from the regional comparison is that south-east Queensland is much less flexible in regards to the financial transactions practice area than the remote and regional locations. For example, venues in south-east Queensland comply with 94% of elements in this practice compared with 67% in Longreach and 85% in Townsville. This difference can probably be explained by the closer relationships that are likely to exist between the customer and venue in regional and remote areas and also by the fact that venues may act as surrogate banks in the more remote areas.

Venue Size and Compliance with the Code

Table 3 shows the differences in compliance rates between small and large venues. It is clear that these differences are quite marked, with small venues much less compliant with the Code's practices (56%) than large venues (85%). The overall difference in compliance between small and large venues is due to major differences in three practice areas - the provision of information, interaction with customers and the community, and exclusion provisions. Differences in the other three practice areas are either non-existent or negligible.

Venue Type and Compliance with the Code

Table 4 outlines the rate of compliance with the Code according to venue type. Clearly, the casinos in this study, with an average of 97% compliance, are much more compliant with the Code's practices than either the hotels or clubs. There appear to be few differences between clubs and hotels, with hotels complying on average with 67% of practices, and clubs complying on average with 74%. The difference between hotels and clubs can probably be explained, to some extent, by the fact that there were fewer small venues in the club sample than in the hotel sample. As noted previously, small venues had a lower average compliance rate than large venues.

The one practice area where there appears some difference between hotels and clubs is in interaction with customers and the community. Clubs (67%) appear to be more proactive in engaging with customers and the community than hotels (52%). It seems these links are stronger because of the community and membership focus of clubs.

The casinos in this study, with an average of 97% compliance, are much more compliant with the Code's practices than either the hotels or clubs.

Perceived Adequacy of the Code

The level of compliance with the Code should logically be related to venue managers' perceptions of the value of the practices. That is, the more satisfied a manager is that the practices are likely to be successful, the more likely he or she will comply with them. However, this hypothesis was not supported across all areas of the code. This study attempted to examine the perceived adequacy of the practices by asking venue managers and staff how successful they believed the practices would be in encouraging responsible gambling. Managers were asked to rate their response on a five point Likert scale from 'strongly disagree' to 'strongly agree', and discussion of this response was encouraged. A copy of the second part of the interview schedule is contained in Figure 2.

Figure 2: Interview Schedule – Adequacy

Now we'd like to move on to the second topic for this research, the adequacy of responsible gambling strategies. Rate each question by placing a circle around your answer below each question.

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

1. In your opinion, is it likely that the provision of adequate information and signage about gambling (such as knowing odds of winning, rules of games) encourages responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

2. Do you think that there are adequate gambling related support services to assist customers and members of the community who need this help?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

3. Does exclusion for problem gamblers **really** encourage responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

4. Is it likely that a venue's physical layout and environment can encourage responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

5. In your view, do rules and limits on financial transactions encourage responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

6. Do you think that current advertising and promotions help promote responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

7. In the package of responsible gambling practices mentioned above, does any one stand out as being an important **barrier** in encouraging responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

8. In the package of responsible gambling practices mentioned above, does any one stand out as being an important **facilitator** in encouraging responsible gambling?

Strongly Disagree; Disagree; Don't Know; Agree; Strongly Agree

Comments:

Well, thank you very much for your cooperation in this research on responsible gambling practices. We hope that as a result of this and other similar research, that these strategies will be reviewed and refined so that they are better able to protect gambling consumers.

The QOGR had posted a copy of the code to each venue in the preceding months; it was therefore assumed that managers were aware of the existence of the code, although some managers did not have any knowledge of its provisions. Where this facilitated the discussion, a copy of the code was made available to these managers. Their perceptions are presented in Table 5.

The practice area considered by venue managers and staff as being the most likely to succeed was physical environments. Managers and staff from 80% of venues agreed that this practice area is likely to encourage responsible gambling. As one manager observed 'our gaming room is like a fishbowl. This helps prevent extended play because people like privacy when they play'. Another manager argued that 'many gambling venues are too dark, confined and removed from other venue activities. Clocks, free tea or coffee and natural light all help prevent extended playing'.

Interactions with customers and the community received a 67% rate of approval from managers and staff. However, one manager cautioned that, while he was positive about interactions, the value of this strategy 'depends on the venue and how active it is with responsible gambling'. The manager went on to suggest that it 'only works if the venue that they (problem gamblers) gamble at knows where to send them'.

One manager suggested that there was a 'need for a public education campaign – like speeding or drink driving'. Another manager was skeptical about the ability of the advertising strategy, noting that he had 'yet to see any rogues doing responsible advertising'.

Approximately 60% of managers and staff agreed that the practice area of financial transactions would promote responsible gambling. 'Electronic banking is one of the pitfalls for gamblers. ATMs are so numerous and accessible. Gambling venues' ATMs should only be for debit cards'. Some managers noted that 'gamblers gamble in cash so they expect they should be paid in cash. Big winners should be offered cheques for security reasons but while there needs to be a cutoff point, \$300 is too low. Give people a choice'.

Approximately 60% of managers and staff agreed that the practice area of financial transactions would promote responsible gambling.

Approximately 57% of managers and staff believed that exclusion provisions would be successful. Managers were very polarized in their perception of this strategy. Some people were very positive while others were unimpressed with self exclusion. A positive manager stated that 'self exclusion is a most effective strategy. This is the first step to recovery. I have known people where it has worked. A regular gambler stopped coming here for three years after self exclusion'.

A number of managers were unimpressed with self exclusion as a strategy because the self excluded gamblers could go easily somewhere else to gamble. 'Self exclusion worked a 100% for one person from here because they had no car and there are no other places (gambling venues) nearby. But for someone with transport, self exclusion would make no difference as they could go from one venue to another'. To overcome this there was a need, according to a number of managers, to have a regional approach in order to have an effective self exclusion system. 'We are working with Centrecare to devise a self exclusion that applies to all venues in the region' advised one manager.

The least supported practice area, with a rating of 40%, was the provision of information. As one Longreach manager observed 'people will only take notice of what they want to; most gamblers would ignore the messages unless they became desperate'. A Townsville manager noted that 'I have never seen anyone in the club look at it (the signs), since they have been put up'. Despite this pessimism from some managers and staff about the effectiveness, there were others who were very positive about the strategy. One manager believed 'people are becoming more aware of problem gambling due to the signage' and another suggested that signage was good and that 'wallet style business cards are a great way of getting the message across'.

Table 5 Regional Location and Perceived Adequacy of the Code

Region by count of venues and percentage of total venues	Provision of adequate information & signage encourages responsible gambling			Support services are adequate to assist customers and the community who need help			Exclusion really encourages responsible gambling			Physical layout & environment encourages responsible gambling			Rules & limits on financial transactions encourage responsible gambling			Advertising and promotions help promote responsible gambling		
	A	D	DK	A	D	DK	A	D	DK	A	D	DK	A	D	DK	A	D	DK
LR 4	0	3	1	2	2	0	0	2	2	3	0	1	2	0	2	3	1	0
%	-	75	25	50	50	-	-	50	50	75	-	25	50	-	50	75	25	-
SE 14	7	7	0	9	0	5	10	3	1	13	1	0	10	3	1	11	3	0
QLD %	25	25	-	64	-	36	71	22	7	93	7	-	71	22	7	78	22	-
TV 1	5	6	1	9	2	1	7	4	1	8	2	2	6	6	0	6	3	3
%	42	50	8	75	17	8	59	33	8	66	17	17	50	50	-	50	25	25
Total 30	12	16	2	20	4	6	17	9	4	24	3	3	18	9	3	20	7	3
%	40	53	7	67	13	20	57	30	13	80	10	10	60	30	10	67	23	10

LR – LONGREACH SEQLD – SOUTH EAST QLD TV – TOWNSVILLE A – AGREE D – DISAGREE DK – DON'T KNOW

Table 6 Venue Size and Perceived Adequacy of the Code

Size by count and percentage of total venues	Provision of adequate information & signage encourages responsible gambling			Support services are adequate to assist customers and the community who need help			Exclusion really encourages responsible gambling			Physical layout & environment encourages responsible gambling			Rules & limits on financial transactions encourage responsible gambling			Advertising and promotions help promote responsible gambling		
	A	D	DK	A	D	DK	A	D	DK	A	D	DK	A	D	DK	A	D	DK
Small 14	4	8	2	8	2	4	6	4	4	11	1	2	7	5	2	8	5	1
%	29	57	14	57	14	29	42	29	29	79	7	14	50	36	14	57	36	7
Large 16	8	8	0	12	2	2	11	5	0	13	2	1	11	4	1	12	2	2
%	50	50	-	75	12	12	69	31	-	81	13	6	69	25	6	75	12	12
Total 30	12	16	2	20	4	6	17	9	4	24	3	3	18	9	3	20	7	3
%	40	53	7	67	13	20	57	30	13	80	10	10	60	30	10	67	23	10

A – AGREE D – DISAGREE DK – DON'T KNOW

Table 7 Venue Type and Perceived Adequacy of the Code

Type by count and percentage of total venues	Provision of adequate information & signage encourages responsible gambling			Support services are adequate to assist customers and the community who need help			Exclusion really encourages responsible gambling			Physical layout & environment encourages responsible gambling			Rules & limits on financial transactions encourage responsible gambling			Advertising and promotions help promote responsible gambling		
	A	D	DK	A	D	DK	A	D	DK	A	D	DK	A	D	DK	A	D	DK
Hotel 17	6	9	2	11	2	4	10	4	3	13	1	3	7	7	3	10	5	2
%	35	53	12	65	12	23	59	23	18	76	6	18	41	41	18	59	29	12
Club 11	5	6	0	8	1	2	5	5	1	10	1	0	9	2	0	8	2	1
%	45	55	-	73	9	18	45	45	9	91	9	-	82	18	-	73	18	9
Casino 2	1	1	0	1	1	0	2	0	0	1	1	0	2	0	0	2	0	0
%	50	50	-	50	50	-	100	-	-	50	50	-	100	-	-	100	-	-
Total 30	12	16	2	20	4	6	17	9	4	24	3	3	18	9	3	20	7	3
%	40	53	7	67	13	20	57	30	13	80	10	10	60	30	10	67	23	10

A – AGREE D – DISAGREE DK – DON'T KNOW

Regional Location and the Perceived Adequacy of the Code

Table 5 also shows regional differences in the perceived adequacy of the Code. In comparison to all venues, managers and staff in Longreach were less positive about the practices, with the exception of advertising. The high level of support for responsible advertising in Longreach occurred despite the fact that none of the venues in the town undertook any advertising.

Venue managers and staff in Townsville were most positive about the practice area of interaction with customers and community. The high level of support for this practice amongst Townsville respondents is probably indicative of the active cooperation that exists between some gambling providers and the local community support sector. Venue managers and staff in south-east Queensland were generally more positive about the practices than managers and staff in the other two regions, with the exception of provision of information and interaction with customers and the community. This more positive view amongst managers and staff in south-east Queensland could be a result of easier access to the Code, a transfer of supportive attitudes to responsible gambling from southern states, and the higher level of training in responsible provision of gambling undertaken in the region.

Venue Size and Perceived Adequacy of the Code

Table 6 shows differences in the views about the potential effectiveness of the Code's practices between small and large venue managers and staff. Clearly, except for the practice of physical environments, managers and staff at small venues are less sure of the value of the Code's practices than managers and staff in large venues. This would suggest that the government, Clubs Queensland and the Queensland Hotels Association need to increase the exposure of small venues to the benefits of the Code in order to increase compliance by managers and staff of small gambling establishments.

Managers and staff at small venues are less sure of the value of the Code's practices than managers and staff in large venues.

Venue Type and Perceived Adequacy of the Code

There are some important differences between the perceptions of managers and staff in hotels and those in clubs (see Table 7). Club managers and staff are more positive about all the practice areas, except for exclusion provisions. Again, the more positive attitude amongst club personnel seems to explain the higher level of Code compliance in the club sector. It is difficult to find an explanation for the differences in perceptions between club and hotel managers and staff, other than perhaps historical and cultural differences between the sectors.

Facilitators and Barriers to Implementing the Code

Analysis of the observational and interview data collected from each venue led to the identification of several facilitators that heighten compliance with the Code, thus assisting in its effective implementation. The identified facilitators were:

- Staff training, education and development in responsible provision of gambling.
- Membership in an industry association which resulted in increased knowledge and training of staff.
- A sound understanding of the philosophy behind the Code.
- The provision of support materials.
- Legislative requirements embedded within the Code which were adhered to by the majority of venues.
- Managers' previous experience in responsible provision of gambling.
- QOGR audits of venues.
- Well established links between venues and community support services.

Several barriers were found to hinder compliance with the Code, thus preventing its effective implementation:

- A high level of staff turnover.
- Venue not being an industry association member.
- Apathy of some managers.
- Remote location of venues.
- Busy nature of work for owner-managers.
- Competitive pressures.
- Non-receipt of the Code or Resource Manual

Given the ongoing efforts of the QOGR in distributing and raising awareness of the Code since this study was conducted, it is expected that some of these barriers, such as the apathy of some managers and non-receipt of the Code, would have abated in the period since this study was conducted.

Conclusion

The findings from this study indicate that generally the level of compliance with the practices of the Code is variable, with some venues more compliant than others. Clearly, small venues and venues in remote locations are much less likely to be compliant with the Code. The data also suggest that casinos have a higher level of compliance than either hotels or clubs. Further research into ways to increase voluntary compliance with industry specific codes of practice is recommended.

Location, venue size and venue type also appear related to perceived adequacy of the Code. The data suggest that managers and staff in remote locations, such as Longreach, are less convinced about the potential effectiveness of the Code's practices than managers and staff in the other two regions. In addition, managers and staff in small venues are generally less positive about the practices than their counterparts in large venues. Managers and staff in clubs, with the exception of the exclusion practice area, have a more optimistic attitude towards the adequacy of the practices than hotel personnel. It is quite likely that there is a relationship between the level of compliance and the perceived effectiveness of the practices. However, it was not possible to establish this link statistically with the data collected in this study. An understanding of this relationship, obtained through further research, would be of use to responsible gambling advocates and governments seeking to improve perception of, and therefore compliance with, these measures.

Small venues and venues in remote locations are much less likely to be compliant with the Code.

Despite the differences amongst the venues in the various locations, and amongst those of different size and venue type, certain factors can be identified that facilitated or hindered the Code's implementation. Facilitating factors included staff training, education and development in responsible gambling, industry association and member commitment to the Code, understanding the philosophy underpinning the Code, adequate support materials and resources, some practices with legislative overlap, prior experience with responsible gambling in other state systems, regular audits, and strong links with community support networks. Impediments hindering the implementation of the Code included high staff turnover, low levels of staff training and education in responsible gambling, not being a member of an industry association, managerial apathy, being in a remote location, being a busy owner-manager, and not receiving a copy of the Code and other responsible gambling materials. These facilitators and impediments provide direction for ways to encourage the more widespread implementation of this and other voluntary codes of practice.

Other areas where further research is advocated include: an investigation of effective channels for the dissemination of information on responsible gambling, problem gambling, and counselling services to the wider community; the impact of the

code on player gambling behaviours; a consideration of the effectiveness of venue-based signage; and an exploration of the advertising and promotions practices of gambling operators.

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