

29<sup>th</sup> January 2004

Mr Matthew Pearce  
Project Manager  
Gambling Harm Minimisation Review  
IPART Submissions  
PO Box Q290  
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Dear Matthew

Thank you for the opportunity to comment on the CCBF submissions to the IPART Inquiry.

In commenting on the papers, the AGC does so according to the framework put forward in its submission to IPART. In particular, it draws on the strategic framework and principles set out in the **Reno Model** (Prof Blaszczyński, Ladouceur and Shaffer), which is also attached for your consideration.

The AGC has not provided comments on the NIEIR paper as it does not relate to harm minimisation. We also note that the paper by the Centre for Gambling Studies, Auckland University provides a review of the work done by the University of Sydney on machine modification. The AGC strongly supports an independent peer review process and recommends to IPART, that peer review be an integral part of research to develop harm minimisation strategies.

Should you wish to discuss any of these points, please do not hesitate to contact me.

Yours sincerely

Vicki Flannery  
Chief Executive  
Australian Gaming Council

**"The Psychological Causes of Problem Gambling: A Longitudinal Study of at Risk Recreational EGM Players." By Professor Mark Dickerson, Dr John Haw, Ms Lee Shepherd.**

Professor Robert Ladouceur's comments on this paper are attached. Professor Ladouceur comments were not commissioned by the AGC, but are provided from scientific interest in the subject.

The AGC would add the following to Professor Ladouceur's comments:

1. The concept of impaired control or dissociation, in relation to gambling is described anecdotally, but not explained or operationalised from a psychological perspective. It does however have important implications for responsible gambling strategies and in particular for the notion of informed choice, appropriate player information, venue and customer assistance programs and policies and staff training.

Further work should be undertaken to better understand the "phenomena" of impaired control or dissociation and to inform responsible gambling strategies.

2. The "smart card" concept proposed suffers a number of flaws. Leaving aside the negative impacts on "regular" players, and the implementation issues, the **Reno Model** suggests that an intrusive measure of this kind would be an ineffective harm minimisation measure. A principal reason is because player behaviour tends to adapt to override the objective, which is to pre-commit player expenditure.

This could occur in two ways;

Firstly, a natural response would be for a black market to develop, which would enable players to access "illegal" cards and to continue to play.

Secondly, players would be encouraged to set higher spend limits than they may have otherwise, in order to prevent being stopped from playing. In these cases, making players pre-commit to a limit could be harmful, as they may be tempted to play up to that limit set on the card, which may have been more than they would have spent otherwise.

**Testing of Harm Minimisation Messages, Barbara Riley-Smith, Jacqui Binder**

This paper explores the important issue of the effectiveness of consumer messages to encourage responsible gambling behaviour.

The report highlights an issue central to the **Reno Model** – that is the distinction in prevention and treatment.

The researchers find that the messages tested, mix responsible gambling and problem gambling messages in one communication, and are therefore less effective.

From a public health point of view, a preferred approach would be to target audiences with responsible gambling messages to encourage responsible gambling behaviour, and alternatively to target problem gamblers with messages about where and how to find treatment.

**An Assessment of Member Awareness, Perceived Adequacy and Perceived Effectiveness of Responsible Gambling Strategies in Sydney Clubs**, Dr Nerilee Hing

**The objective of this research was:**

**To assess the perceived efficacy of current responsible gambling strategies in Sydney clubs by:**

- measuring the level of awareness of club patrons of their club's responsible gambling strategies (**awareness**),
- whether club members think their club's responsible gambling strategies are adequate in minimising harm and protecting consumers in gambling (**perceived adequacy**),
- whether club members consider that their club's responsible gambling strategies have changed their gambling behaviour and in what ways (**perceived effectiveness**);

**To assess the perceived efficacy of current responsible gambling strategies in Sydney clubs for different subsets of gamblers** (including 'at-risk' and 'recreational' gamblers, men compared to women, different age groups and those who participate in different forms of club gambling (gaming machines, TAB, keno).

The research relies on customer interviews to assess levels of awareness, adequacy and effectiveness of responsible gambling measures.

This methodology is useful to a point ie. are players aware of "responsible gambling" measures? However, it does not provide sufficient evidence about whether players act on this information, ie. does the message influence behaviour? To assess this rigorously would require properly controlled experiments over time to test different harm minimisation policies and programs.

Furthermore, although players may not be aware of a particular harm minimisation measure ie. lighting, it may influence their behaviour and this data has not been captured in the report.

Finally, this research highlights an important area of consumer protection – a next step would be not only to measure awareness, but whether awareness influenced behaviour ie. to play responsibly, or to seek assistance.

### **Evaluation of the Impact of the Three Hour Shutdown of Gaming Machines – Final Report , ACNielson**

The impact of the shutdown on problem gamblers and their family is examined from two perspectives:

1. Directly from problem gamblers and their family
2. Indirectly from the support agencies, based on their understanding and knowledge of their clients.

The primary comment of the AGC relates to the methodology, which we consider should be seriously questioned. The methodology employed was to interview a very small sample of problem gamblers which is not representative of the problem gambling population. Moreover, the methodology relies on asking people their attitudes towards the changes in opening hours rather than measuring the impact. The findings, therefore, are totally anecdotal and not supported by empirical evidence.

**A REVIEW BY PROFESSOR ROBERT LADOUCEUR, PH.D.,**  
**ÉCOLE DE PSYCHOLOGIE, UNIVERSITÉ LAVAL,**  
**STE-FOY, QUEBEC, CANADA, G1K 7P4**

**"THE PSYCHOLOGICAL CAUSES OF PROBLEM GAMBLING: A LONGITUDINAL  
STUDY OF AT RISK RECREATIONAL EGM PLAYERS."**

**BY PROFESSOR MARK DICKERSON  
DR JOHN HAW  
MS LEE SHEPHERD (SENIOR RESEARCH ASSISTANT)  
University of Western Sydney - School of Psychology Bankstown Campus**

**OVERVIEW**

This paper addresses a very important issue for our understanding of the notion of "Control" among gamblers. The clarification of its process and components could be most useful in designing therapeutic and preventive interventions, mainly in the context of Responsible Gambling. But some limitations of the paper need to be pointed out.

- a) The title is misleading: it equates regular players with being "at risk" but the authors do not evaluate, assess or characterise what "at risk" means. It is taken for granted. The authors assume "if you often play the egm, you are necessarily at risk". For the non specialist reader in problem gambling, it may create a false perception. The whole paper is built on many non empirically derived assumptions such as:

- 1) egm is a gambling activity that generates most of the PG
- 2) egm is deleterious in itself (a moral non scientific approach)
- 3) egm gambling is a kind of risk factor
- 4) regular egm gamblers are at risk

The authors infer that the activity (not the abuse) per se of EGM play is dangerous.

- b) Brilliant idea to explore the notion of impaired control in a longitudinal design. Only by repeating measures over time on the same sample (longitudinal design) will we be able to identify the development and the maintenance of risk and protective factors. The authors use this design but the number of participants included is rather small and the time period used is limited. Following these participants for at least one year would have provided more representative results.
- c) The authors argue that "impaired control is a common and natural experience [...] of the typical regular egm player" (p.7). This assertion is mainly based on interviews. The exploratory nature of these qualitative data does not support the conclusion that impaired control is generalized among egm players. And more importantly, the notion of "impaired control" as used in the present paper does not necessarily reflect the presence of a psychological or psychiatric problem. Most people often lose control on their daily activities and hobbies, without creating a severe or even a minor problem. The meaning of "impaired control" as used in the present context urgently needs to be qualified in the context of a possible mental

(psychological or psychiatric) problem. The major difficulty is to equate "impaired control" (as used in this paper) with the presence of a problem ! (see below)

- d) Unfortunately, loss of control, impaired control, transient loss of control, permanent loss of control were not operationally defined. It is a myth to consider transient or temporary loss of control as a symptom of problem gambling.

Impaired control needs to be operationalized (defined and characterised) carefully, in order to differentiate between what could be clinically significant symptoms of harm and what could be the sign of involvement in a pleasurable activity.

- e) The authors assume that loss of control, as measured in their study, is equal to permanent loss of control or problem gambling. This assertion needs to be empirically supported. We have an alternative interpretation of what could be meant here by loss of control. The way the authors measure loss of control such as playing more money than intended or played for more time than expected, may simply be a measure of how much participants liked the activity. We all have practiced some activity and temporarily lost track of time over it, simply because we love it (skiing or fly fishing for me).

## **CONCLUSIONS AND RECOMMENDATIONS**

- f) The conclusions are well beyond what the data indicates.

The authors make strong inferences when they conclude that gamblers cannot make rational decisions when they play egm (almost every recommendation is based on that point of view, which is not supported by the data). Furthermore, the nature of Impaired control seems to be almost exclusively defined from the point of view of the researchers. The authors implicitly define Impaired control as deleterious, thus reflecting the presence of a psychological problem. This is a non empirically validated inference.

- g) Imposing control is an intrusive measure which could be deleterious to the gamblers. The authors need to present pro and cons of their recommendation.
- h) Most of their conclusions are not based on the data obtained in the present study; they simply reflect the opinion of the authors.

Robert Ladouceur, Ph.D., and Michael Cantinotti, M.Ps., École de psychologie, Université Laval, Ste-Foy, Quebec, Canada, G1K 7P4