Gaming Machine Harm Minimisation Measures

RSL Victoria Submission

January 2017
**GAMING MACHINE HARM MINIMISATION MEASURES**

**INTRODUCTION**

RSL Victoria State Branch welcomes the opportunity to provide feedback to the Victorian Government on its review of harm minimisation for gaming machines.

The “Gaming Machine Harm Minimisation Measures” consultation paper released by the Office of Liquor, Gaming and Racing on 1 December 2016 addresses only a small number of the harm minimisation measures currently in place in the State of Victoria. The RSL Victoria State Branch believes that the review should recognise that each of these measures should not be considered in isolation from the many other measures in place.

RSL Victoria State Branch also notes the following non-exhaustive list of harm minimisation measures currently in place:

**Restrictions on Gaming Machine Design Features**

- Minimum return to player percentage;
- Maximum bet, prize and cash input limits;
- A ban on auto-play;
- A ban on misleading display of results;
- A ban on features that give the player an illusion of control over the outcomes;
- Prize probability limits;
- Limits on payout volatility;
- Display of time to be within 5 minutes and to clearly display whether it is am or pm;
- A ban on non-linear pay tables;
- A limit on the maximum number of free spins;
- A ban on depictions of real money (e.g. $50 notes);
- Restrictions on game names and themes;
- A ban on player inducement messages (e.g. ‘try again’, ‘have another go’);
- Restrictions on advertising the maximum prize;
- Further restrictions on the return to player for multi-denomination games;
- A ban on requiring ante-bets to be eligible for jackpots;
- Restrictions on button panel layouts;
- Limits on ante-bets for feature games;
- Restrictions on minimum bet (i.e., a ban on credits being less than 1 cent).
Harm Minimisation and Responsible Conduct of Gambling Regulations

Many of the following represent regulations that are common in intent across Australian jurisdictions (but are not limited to):

- Gambling advertising restrictions or bans;
- State-wide caps on the number of gaming machines;
- Social impact assessments prior to an increase in poker machine numbers;
- Restrictions on minors accessing gambling;
- Bans on inducements (e.g. free alcohol);
- Bans on credit gambling;
- Payment of large prizes via cheque;
- Restrictions on the location of ATMs;
- Self-exclusion schemes;
- Provision of information about problem gambling help services;
- Compulsory responsible gambling training for staff;
- Clocks on gaming machines;
- Signage creating awareness about the risks of excessive gambling and signage encouraging responsible gambling behaviours;
- Public awareness campaigns.

On top of all of the above measures, Victoria’s harm minimisation regime includes:

- Regional caps on gaming machine numbers in areas considered to be vulnerable to gambling harm;
- Municipal limits on EGMs in areas not subject to a regional cap;
- Restrictions on 24 hour gaming;
- Requirements for EGMs to inform players about games, such as the odds of winning;
- Automatic teller machine (ATMs) ban and Electronic Funds Transfer at Point of Sale (EFTPOS) withdrawal limits;
- Limits on note acceptors, auto play facilities and spin rates;
- Maximum bet limits of $5 for EGMs;
- A prohibition on gaming machine advertising outside gaming machine areas;
- Limitations on the display of gaming machine signage;
• Mandatory display of talkers and posters with prescribed wording;
• Mandatory Responsible Gambling Codes of Conduct;
• Bans on moneyless EGMs and the use of earphones;
• Establishment of the Victorian Responsible Gambling Foundation (VRGF);
• YourPlay, a state-wide networked voluntary pre-commitment scheme
• Venue Support Workers.

RSL Victorian State Branch is pleased to provide feedback on the following topics considered in the consultation paper:

  a) Access to cash in gaming venues;
  b) Cashless gaming and TITO;
  c) Responsible Gambling Codes of Conduct
  d) Self-exclusion programs;
  e) Responsible service of gaming training;
  f) Regional and municipal limits on gaming machine numbers.

**Access to Cash**

**EFT**

It is a priority that RSL Victoria Sub-Branches provide an attractive food and beverage offer to be utilised by our members and guests. We are of the view that the members and guests utilising the dining facilities and/or sharing a drink should not be limited to a $200 transaction per day.

On this basis there should be no changes to the current EFT withdrawal limits.

**Cheques**

It is the preference of RSL Victoria to minimise or eliminate the use of cheques in gaming venues. Our observation is that the use of cheques in day to day financial transactions in the community is rapidly decreasing. The administration required for cheques impacts both the gaming venue (who need to organise signed cheques to be available to customers) and the customer who needs to make time in business hours to deposit a cheque at the bank.
RSL Victoria supports a change to the cheque limit of $5,000 to enable patrons to more quickly and easily finish play and be paid their winnings instead of continuing to gamble for longer periods of time as currently occurs. This would bring Victoria into line with cheque limits in NSW and Queensland which have not observed issues arising from higher limits.

RSL Victoria is supportive of allowing payment by EFT to be permitted in addition to payment by cheque.

**TITO AND CASHLESS GAMING**

RSL Victoria State Branch would support the introduction of both TITO and cashless gaming to the industry. There is an increasing trend toward cashless transactions in the community, and it is appropriate that this be accommodated within the industry. There is no evidence from other jurisdictions where cashless gaming or TITO are offered that harm from gambling has increased.

There is no dispute that TITO and cashless systems improve security and cash handling procedures for venue operators. They also reduce administrative tasks, such as re-filling EGM hoppers with coins and converting coin winnings into notes for players. Reduction of these time-consuming administrative burdens should allow venue staff greater opportunities to observe the behaviour of patrons which in turn may assist in the identification of players with potential gambling problems.

**RESPONSIBLE GAMBLING CODES**

RSL Victoria State Branch supports the operation of the current Responsible Gambling Codes.

**SELF-EXCLUSION PROGRAMS**

RSL Victoria State Branch endorses and supports the current Self-Exclusion program, which was an industry initiative. The Gaming Machine Harm Minimisation Consultation Paper notes that a web based Multi –Venue Self-Exclusion system that allows people to exclude themselves from clubs in the local area via an online system has been developed in New South Wales. RSL Victoria State Branch would welcome the opportunity to explore the implementation of such an initiative in Victoria, assuming it complements the existing arrangements.

If it could be successfully implemented, it would be preferable to have one self-exclusion program in Victoria.
ADVANCED RESPONSIBLE SERVICE OF GAMING TRAINING

As a general principle, RSL Victoria supports the philosophy of continued education and training of gaming venue staff in the effective delivery of responsible service of gaming.

As changes to the arrangements for responsible service of gaming (RSG) training have only recently been introduced, RSL Victoria is of the view that these should be allowed to continue to allow proper assessment of their effectiveness.

REGIONAL CAPS AND MUNICIPAL CAPS

RSL Victoria notes the following:

1. There is a statewide cap on the total number of gaming machines.

2. No new venues or movement of gaming machines can occur until the VCGLR is satisfied there will be no net detriment to the well-being of the local community from such a change. Included in this process is the preparation of a social and economic impact statement as well as a public hearing by the VCGLR before it makes a determination.

3. The process undertaken by the VCGLR ensures that additional gaming machines are not moved into locations where they may increase harm.

The regional and municipal caps therefore appear to be a comparatively blunt instrument which causes an unnecessary additional layer of regulatory burden for the VCGLR with minimal, if any, benefit with respect to harm minimisation.

For further information regarding this submission please contact David Ridley – Manager Network Planning and Development by telephone on (03) 9655 5540 or by email dridley@rslvic.com.au or Clint Brewster – Charity & Risk Manager on (03) 9655 5535 cbrewster@rslvic.com.au