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# EXECUTIVE SUMMARY

The term ‘responsible gambling’ has a long history in academic and government discussions of gambling. However, there have been few systematic examinations of the way the term is used, or what it means to gamblers. This paper aims to explore the current usage of the term ‘responsible gambling’, and elucidate the evidence about the most effective ways to promote responsible gambling.

Responsible gambling means both responsible provision of gambling, which requires governments and industry to ensure gamblers can participate in gambling safely, and responsible consumption of gambling by consumers.

Responsible provision of gambling is partly achieved through regulation, such as the YourPlay pre-commitment system or the restrictions on automatic teller machines (ATMs) in venues. However, as identified by the recent O’Farrell (2016) review, there are some gaps in the legislation for online wagering products. Responsible consumption of gambling is encouraged through social marketing, programs in venues, and Responsible Gambling Awareness Week.

Responsible gambling means both responsible provision of gambling, which requires governments and industry to ensure gamblers can participate in gambling safely, and responsible consumption of gambling by consumers.

Key concepts that underpin responsible gambling are:

- awareness of risk – gamblers must understand both the odds of winning at their preferred gambling product, and the risk of developing gambling harm, so they can make an informed choice to participate
- control – gamblers must maintain control over their gambling activity, and products must facilitate gamblers’ self-control
- limit-setting – gambling should occur within affordable and appropriate limits
- entertainment – gambling should only be an entertainment activity, and should be balanced with other recreational activities.

Traditional views of responsible gambling have been criticised as focusing on a dichotomy between responsible gambling and problem gambling while ignoring other gamblers who may be harmed.

In practice, messages calling for people to gamble responsibly do not reach low and moderate-risk gamblers, as these gamblers believe their behaviour is already responsible and controlled.

Yet recent research which highlights that 85 per cent of the harm from gambling arises from low and moderate-risk gamblers makes it clear that their gambling behaviour is not protecting them from harm. It may be that responsible gambling needs to be redefined in a way that will better influence gamblers in the low and moderate-risk categories. More effective messages for low and moderate-risk gamblers may need to focus on behaviours associated with responsibility (such as setting appropriate limits).

Overall, it is the case that those in the non-risk category of gambling (82 per cent of all those who gamble) need little extra information or education about how to gamble responsibly. It is likely that messages around maintaining control, setting limits and sticking to them only confirm what people in this category already do. Moreover, the secret of success for these people lies in how they do those things.

However, it is also clear that, for many in the low-risk, moderate-risk and problem gambling categories:

- the responsible gambling messages are not getting through or
- they lack sufficient content knowledge to act as a check against behaviour that is resulting in harm.

In practice, messages calling for people to gamble responsibly do not reach low and moderate-risk gamblers, as these gamblers believe their behaviour is already responsible and controlled.

Improvements in responsible gambling, as a basis for reduced harm, involve creating changes in how those in the gambling risk groups think about their gambling and how they gamble. Such improvements may be found in changing gamblers’ knowledge as well as providing them with better environments in which to stay in control when they gamble.

# INTRODUCTION

This paper explores the ways in which responsible gambling has been defined, as well as current discussions around the use of the term. It examines the most up-to-date research on how to promote responsible gambling, and raises for consideration how new research on gambling harm may influence our understanding of responsible gambling.

The paper first examines the definition of responsible gambling, and the principles that have historically been seen as essential to achieving responsible gambling. This includes awareness of risk, control, setting limits and gambling for entertainment. It then discusses the existing programs for responsible provision and consumption of gambling.

The next section of the paper discusses the relationship between responsible gambling and harm. This section suggests that responsible gambling has historically been defined in opposition to problem gambling, and that this definition has not addressed harm to low and moderate-risk gamblers. However, there is clear evidence that low and moderate-risk gamblers are not gambling responsibly. The harm experienced by these groups makes them a valid target group for responsible gambling initiatives.

The final section of the paper discusses current definitions of responsible consumption of gambling, and proposals in the research for how they could be improved.

# WHAT IS RESPONSIBLE GAMBLING?

In this section, we examine the traditional ways that responsible gambling has been defined, and the principles that have historically been seen to underpin responsible gambling.

## Background and definition

The term ‘responsible gambling’ was first used in the mid-1990s as a way of describing both gambling behaviours and gambling environments. It seems likely that this term has its origins in discussions of alcohol, where discussions of ‘responsible drinking’ have a long history.

Some conceptual confusion about the term has been noted for many years (Blaszczynski, Ladouceur & Shaffer 2004). ‘Responsible gambling’ is often used to refer to the behaviour of consumers (for example, as being informed and gambling within appropriate limits). In this way it is similar to the use of ‘responsible drinking’ in discussions of alcohol. However, ‘responsible gambling’ can also describe the behaviour of governments and industry in providing environments where consumers can safely enjoy gambling.

It seems likely that this term has its origins in discussions of alcohol, where discussions of ‘responsible drinking’ have a long history.

Hing, Russell and Hronis (2016) divide responsible gambling into two conceptually distinct but linked categories: responsible *consumption* of gambling and responsible *provision* of gambling. This is a helpful distinction and will be used throughout the paper. Hing, Russell and Hronis (2016) also provide further details about how to define responsible consumption of gambling. According to this study, responsible consumption of gambling involves:

Exercising control and informed choice to ensure that gambling is kept within affordable limits of money and time, is enjoyable, in balance with other activities and priorities, and avoids gambling-related harm.

In contrast, Hing (2003) defines responsible provision of gambling in terms of corporate social responsibility. In this definition, responsible gambling is:

... the conduct of gambling in a manner that meets key stakeholder expectations for socially responsible principles, socially responsive processes and socially desirable outcomes in managing the corporate social impacts of gambling.

The foundation’s definition of responsible gambling also reflects a split between consumption and provision of gambling. The foundation considers that responsible gambling requires action from a variety of stakeholders, and defines responsible gambling separately for consumers and for industry, government and other stakeholders. The foundation’s definition of responsible gambling is shown below.

### DEFINITION OF RESPONSIBLE GAMBLING

Responsible gambling for individuals means:

- they may gamble for pleasure and entertainment but are aware of the likelihood of losing and understand the associated risks
- they exercise control over their gambling activity
- responsible gambling occurs in balance with other activities in their lives and is not causing problems or harm for themselves or others.

Responsible gambling for the broader community, including gambling providers, governments and sporting associations, requires:

- shared responsibility for generating awareness of the risks associated with gambling
- creating and promoting environments that prevent or minimise problem gambling
- being responsive to community concerns around gambling.

## Principles of responsible gambling

Principles for the responsible consumption and provision of gambling have been defined separately. Blaszczynski et al. (2011) argue that the responsible provision of gambling:

... attempt(s) to impose a duty of care to protect the public from gambling-related adverse events by:

- (1) educating individuals about the nature of gambling as a recreational product containing associated risks, notably the potential to become excessively preoccupied with gambling and developing an inability to cease or control gambling despite negative consequences in domains of social, legal, employment and familial functioning;
- (2) encouraging players to wager within affordable limits; and
- (3) providing sufficient information about a game to allow players to exercise informed decisions regarding all aspects of their participation.

In contrast, responsible consumption of gambling is defined by Hing, Russel and Hronis (2016) as:

- gambling within an individual's affordable limits of time, money and other resources – which may involve setting and adhering to limits in advance of gambling
- keeping gambling in balance with other activities and priorities – so that it does not cause harm for self or others
- exercising informed choice over gambling – which includes understanding the associated risks, not having erroneous gambling beliefs, and knowing the odds or the likelihood of losing and winning
- staying in control of gambling – through self-regulating one's own gambling and knowing when to stop
- an enjoyable/pleasurable gambling experience – motivated by gambling only for pleasure, entertainment and fun
- absence (harm prevention) or low risk (harm minimisation) of gambling-related harm – which avoids the development of gambling problems.

However, it is possible to synthesise a group of key concepts that underpin both the responsible provision and the

responsible consumption of gambling. These concepts are relatively common across the literature on this topic. The key concepts (or basic principles) that underpin responsible gambling are:

- awareness of risk – gamblers must understand both the odds of winning at their preferred gambling product, and the risk of developing gambling harm, so they can make an informed choice to participate
- control – gamblers must maintain control over their gambling activity, and products must facilitate gamblers' self-control. As a corollary, products and promotions should not have the intent or effect of undermining that self-control
- limit-setting – gambling should occur within affordable and appropriate limits
- entertainment – gambling should only be an entertainment activity, and should be balanced with other entertainment activities.

Historically it has been the case that all of these principles have been underpinned by one central aim, which is to prevent problem gambling. Some discussions of responsible gambling have been framed in terms of harm minimisation more broadly (Blaszczynski et al. 2011). Reviews of government and industry communications, however, have clearly shown that responsible gambling is defined in opposition to problem gambling (Miller et al. 2016). Some measures clearly designed to target problem gambling, such as the provision of gambling treatment service information or self-exclusion programs, are labelled as responsible gambling measures. This reflects the way these two terms are seen as tied together.

## Responsible provision of gambling

Regulation of gambling products focuses on responsible provision of gambling. In this section we will examine responsible gambling mechanisms for gaming machines and wagering (including both sports betting and betting on racing).

## Gambling legislation and regulation

Gambling in Victoria is a highly regulated product. Key pieces of legislation include the *Gambling Regulation Act 2003* (Vic.), the *Casino Control Act 1991* (Vic.) and the *Interactive Gambling Act 2001* (Cwlth). The principle behind this legislation and regulation is to ensure that gambling is provided in a lawful and responsible fashion. This legislation and regulation sets the basis for the responsible provision of gambling in Victoria.



### ***Gambling Regulation Act 2003 (Vic.)***

The Gambling Regulation Act regulates all forms of terrestrial gambling in Victoria, including gaming machines, betting on racing, sports betting and lotteries. One of the objectives of the Gambling Regulation Act is to foster responsible gambling and minimise harm caused by problem gambling. The Gambling Regulation Act is supported by more than 30 sets of regulations that relate to different gambling products.

### ***Casino Control Act 1991 (Vic.)***

The Casino Control Act establishes a system for licensing, supervision and control of casinos in Victoria. At present, only one casino, Crown Casino, is licensed in Victoria. This licence is governed by the *Casino (Management Agreement) Act 1993* (Vic.). The Casino Control Act is associated with more than 10 sets of regulations that apply to the casino.

### ***Interactive Gambling Act 2001 (Cwlth)***

The Interactive Gambling Act is a Commonwealth Act that regulates online gambling. It permits online wagering and lottery products, but prohibits online gaming machines and casino games.

## **Responsible Gambling Code of Conduct**

It is a condition of holding a licence in the gambling industry that the licence holder has a Responsible Gambling Code of Conduct. The Victorian Commission for Gambling and Liquor Regulation approves codes of conduct.

The Responsible Gambling Code of Conduct has a number of requirements. In particular, licence holders must comply with requirements in the Gambling Regulation Act, relevant regulation, and the criteria and benchmarks provided by the commission. All codes must cover, as a minimum, the following:

- preparation of a code
- availability of the code
- responsible gambling message
- responsible gambling information
- gambling product information
- customer loyalty scheme information
- pre-commitment strategy
- interaction with customers
- interaction with staff
- interaction with problem gambling support services
- customer complaints
- the gambling environment
- responsible advertising and promotion.

## **Responsible gambling mechanisms for gaming machines**

Gaming machines are covered by a large number of harm minimisation and responsible gambling restrictions that are contained in various legislation and regulation within Victoria. Key measures include the new YourPlay system, responsible service of gaming training and the prohibition on automatic teller machines. All of these can be seen as tools to assist gamblers to remain in control of their gambling.

### **YourPlay**

YourPlay is a voluntary pre-commitment system that is available on all gaming machines in Victoria. YourPlay allows gamblers to set a monetary limit or a time limit, and to be alerted when they have reached their limit. It also tracks gamblers' play, allowing gamblers to have a realistic understanding of how much time or money they have spent. YourPlay supports responsible gambling by helping gamblers to set limits and stick to them. It allows players to be informed about how much they are spending on gambling. This information can prompt gamblers to better know and reflect upon the extent of their gambling. Letting them set new limits supports changes in their gambling.

### **Responsible service of gaming**

From 1 January 2017, the content and delivery of responsible service of gaming training for employees at clubs and hotels with gaming machines will be updated. The new training will better equip gaming venue employees to identify and respond to signs suggestive of problematic gambling within venues. The major objective of the training is to increase the probability that:

- gamblers showing signs of distress will be approached by venue staff
- staff will provide these gamblers with appropriate options for addressing issues relating to their gambling behaviour.

### **Automatic teller machines**

Since 1 July 2012, automatic teller machines (ATMs) have been prohibited in gaming venues (with some exceptions, particularly for race tracks and the casino). The aim of removing ATMs from venues was to reduce gamblers' access to cash. It has been shown that gamblers experiencing harm are much more likely to use ATMs while in a venue than people who are not experiencing harm.

In terms of responsible gambling, ATM removal was seen as a prompt to help gamblers retain control. It did this by ensuring that they needed to take a longer break in play when the money in their pockets ran out. Taking time away from the gaming machine has been associated with more rational decision-making. Thus, a break can act as a prompt to cease gambling. As a minimum, if interaction with staff in a venue is required to access EFTPOS, this gives staff an opportunity to intervene.

A 2013 evaluation found the removal of ATMs was effective in improving responsible gambling outcomes, such as control over gambling behaviour and reduced spending by at-risk gamblers (Thomas et al. 2013a).

### Other measures

A summary of the major responsible gambling mechanisms for gaming machines is set out below.

**TABLE 1. Major responsible gambling mechanisms for gaming machines**

Type	Details
Gaming machine caps	<ul style="list-style-type: none"> <li>• There is a statewide cap of 30,000 on electronic gaming machines.</li> <li>• There is a maximum of 105 in hotel and club venues.</li> <li>• Maximum density is 10 gaming machines per 1000 adults for all municipalities not covered by a regional cap (see below).</li> </ul>
Regional caps	Twenty regions of Victoria have specific regional caps on the number of gaming machines as prescribed by the Victorian Commission for Gambling and Liquor Regulation.
Venue shut down periods	Venues are subject to a four-hour minimum closure period; the only 24-hour gaming venue is Crown Casino.
Mandatory cheque payments	Accumulated credits on a gaming machine of \$1000 or more must be paid out in full by cheque.
Credit provision for pokie play	It is prohibited for a venue to provide credit for players to use on electronic gaming machines.
Maximum pokie bet	Maximum bet per spin is \$5.
Spin rates	Except for certain machines in specified areas of the casino, games must not have a spin rate of less than 2.14 seconds.
Return to player	Return is set at a minimum of 85 per cent.
Maximum prize from a single spin	Maximum prize per spin is \$10,000.
EFTPOS transactions	Maximum withdrawal is \$200 per transaction.
Banknote acceptors	Largest note accepted is \$50 (i.e. \$100 not accepted).
Maximum credit load-up	A maximum of \$1000 can be inserted into a gaming machine at a time.
Self-exclusion	From 1 June 2009, club and hotel venues must have a self-exclusion program that has been approved by the Victorian Commission for Gambling and Liquor Regulation.
Staff training in responsible gambling	Gaming venue staff who are working in the gaming machine area of an approved venue or the casino must complete an approved training course within six months of starting employment and a refresher course at least once every three years thereafter.
Signage on gaming machines	Regulations require responsible gambling signage (player information talker) as per the minister's specification to be displayed on each gaming machine so that it is clearly visible.
Advertising restrictions	Since 1 Jan 2005, the publishing of any gaming machine advertising is banned outside the gaming machine area of a venue or the boundaries of a casino.

Source: Department of Social Services 2016, *Australian/New Zealand gaming machine national standard 2015, a national snapshot of harm minimisation strategies*, updated by the Victorian Responsible Gambling Foundation

## Responsible gambling mechanisms for wagering

Responsible gambling measures for wagering, including sports betting and betting on racing, are less developed than for gaming machines. In this section, we will describe three responsible gambling measures that the recent O'Farrell (2016) review has recommended be implemented for wagering products.

### Removal of credit betting

Wagering providers offer payment via 'deferred settlement', meaning that a gambler can place a bet and pay at a later date. This has been shown to have significant negative consequences for gamblers at risk (Financial Counselling Australia 2016). The O'Farrell (2016) review has recommended that additional consumer protection measures should be applied to credit betting.

### Pre-commitment

As discussed above, voluntary pre-commitment is available on all gaming machines in Victoria. This is an important mechanism to promote responsible gambling, as it encourages gamblers to set limits and stick to them. Some online wagering sites already offer voluntary pre-commitment. However, pre-commitment is not always available to gamblers using all online wagering sites. In addition, it is not universal: in the Victorian system for pokies, the gambler can set a limit across all their accounts, but this is not the case everywhere.

The O'Farrell (2016) review includes this recommendation: 'Operators should be required to offer customers an opportunity to set voluntary limits on their wagering activities. Consumers should be prompted about setting or reviewing limits on a regular basis.'

### Self-exclusion

Self-exclusion is another responsible gambling measure available on gaming machines but not available via wagering providers. Self-exclusion allows gamblers to ban themselves from gambling for a period of time. Self-exclusion is available from some wagering providers, but gamblers need to ban themselves from each provider individually. A recommendation of the O'Farrell (2016) review was the establishment of a national self-exclusion register for online wagering providers. This would be an important step in improving responsible gambling provision in the wagering industry.

## Promoting responsible consumption of gambling

The *Victorian Responsible Gambling Foundation Act 2011* commits the Victorian Responsible Gambling Foundation to activities that 'foster responsible gambling'. The foundation has taken action concerning this legislative responsibility by engaging in a number of activities and programs. Those most applicable to promoting responsible consumption of gambling are listed below.

### Responsible Gambling Awareness Week

Responsible Gambling Awareness Week is an initiative of the foundation in partnership with the Victorian Government, local councils, Gambler's Help services, the gambling industry and community groups.

The week has been held annually in Victoria since 2006. Its objective is to generate discussion and increase awareness of issues related to gambling. These include how to gamble responsibly and the role of the gambling industry in providing an environment conducive to responsible gambling.

The week has traditionally focused on increasing awareness of responsible gambling and promoting strategies to stay in control.

Responsible Gambling Awareness Week is supported by events and activities, collateral and materials, a media and social media campaign and website presence. The week is one of the key methods by which the Victorian Responsible Gambling Foundation and its partners are able to communicate to the Victorian community the importance of gambling responsibly.

### Social marketing campaigns

Based on consumer research, the foundation develops media campaigns to increase the community's understanding of risky gambling behaviour. It provides tips and resources to encourage gamblers to recognise when their gambling may place them at risk of harm, and practical ways to keep their gambling under control.

The foundation's most notable social marketing campaign is the recent Bet Regret campaign. This was developed to encourage gamblers to:

- pay attention to the negative emotions they may feel when betting
- use these feelings as a barometer to influence their gambling behaviour.

The campaign helps those displaying risky behaviours, including those who gamble infrequently, and provides tips and tools to bet responsibly.

### Venue best practice guide

The *Venue best practice guide* (Victorian Responsible Gambling Foundation 2016) features examples of innovation and best practice identified by the Venue Support Program in gaming venues across the state. The examples of activities can be used to meet and exceed existing Responsible Gambling Code of Conduct requirements to deliver best practice. The guide is intended as educational material and does not replace or add to any current regulatory or compliance requirements.

Venues can use the guide to benchmark their own practices and identify areas for improvement. Gambler's Help venue support workers can help venues put this guide into practice as part of the regular support and training they provide.

### Venue Support Program

The Gambler's Help Venue Support Program comprises a range of activities that support individual Victorian gaming venues in the responsible provision of gambling products. The program has a particular focus on delivering training and acting collaboratively with venue staff and management to build and maintain responsible gambling environments.

The Venue Support Program operates at the interface between gaming venues and Gambler's Help services.

As outlined in the Responsible Gambling Code of Conduct, gaming venues in Victoria have certain responsibilities. These include a responsibility to identify and respond to patrons showing signs of distress that may be related to problem gambling. The Venue Support Program aims to facilitate this and to support the development of responsible gambling practices and environments within the gaming industry.

In particular, the program will help build the capacity of staff within gaming venues to identify individuals exhibiting gambling behaviours that may be associated with gambling harm. It will also support relevant staff to respond appropriately to individuals exhibiting behaviours that may be related to problem gambling.

The Venue Support Program helps gaming venues to:

- identify and respond to patrons displaying signs of problem gambling
- raise awareness among venue staff about, and encourage referrals to, Gambler's Help services, self-exclusion programs and other community support services
- meet the requirements of their Responsible Gambling Code of Conduct
- create and maintain responsible gambling environments.



# RESPONSIBLE GAMBLING AND HARM

This section will discuss how new research on harm in lower-risk gamblers impacts on understandings of responsible gambling.

## Understanding gambling harm

The foundation recently published a report, *Assessing gambling-related harm: a public health perspective* (Browne et al. 2016), which measured the amount of harm associated with gambling in the Victorian community. This report found that 85 per cent of the harm from gambling in Victoria resulted from the activities of low and moderate-risk gamblers, and only 15 per cent was associated with problem gambling. The harms occurring to low and moderate-risk gamblers are much less serious than those occurring to people with gambling problems. There are, however, many more low and moderate-risk gamblers in the population, which means in aggregate their harms are more numerous.

This report found that 85 per cent of the harm from gambling in Victoria resulted from the activities of low and moderate-risk gamblers, and only 15 per cent was associated with problem gambling.

This research suggests that there is a need for a greater focus on low and moderate-risk gamblers, and on reducing harm in these groups. This involves a focus on *harmful* gambling, rather than *problem* gambling. This is consistent with a public health approach to gambling, which aims to reduce harm across the entire population. While low and moderate-risk gamblers have been the targets of interventions before, in most cases these interventions aimed to prevent the development of problem gambling. The evidence now suggests that, rather than preventing transition into problem gambling, the aim should be to reduce harmful gambling in these groups. This is likely to involve reducing the frequency of play and expenditure, as these are the mechanisms by which harm occurs (Browne et al. 2016).

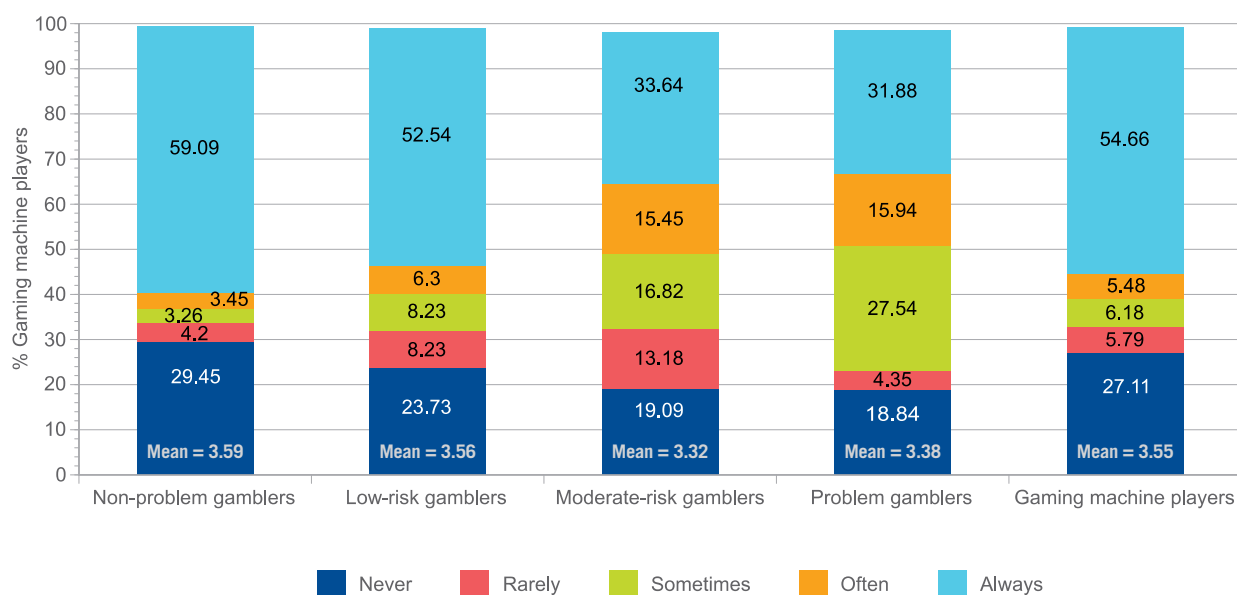
## Responsible gambling and low and moderate-risk gamblers

Historic conceptions of responsible gambling have generally focused on reducing problem gambling, and have not considered at-risk gambling. Miller et al. (2016) note a dichotomy between problem gambling and responsible gambling in government and industry communications. As a binary opposition, this does not allow space for harmful gambling that has not yet reached the level of problem gambling. This study showed that discussions of responsible gambling have not been strongly targeted at low and moderate-risk gamblers.

Gamblers have absorbed this focus on problem gambling. The foundation's market research shows that gamblers have difficulty conceiving of at-risk gambling, and that they define gambling as either responsible or problem gambling. Thomas et al. (2013b) found that moderate-risk gamblers viewed their own gambling as responsible and controlled, in contrast to a highly stereotyped and extreme perception of problem gambling behaviour and its consequences. Members of this group clearly interpret their own behaviours as consistent with responsible gambling. This may contribute to a resistance, both to recognising harms they may be experiencing, and to being prompted to change their behaviour.

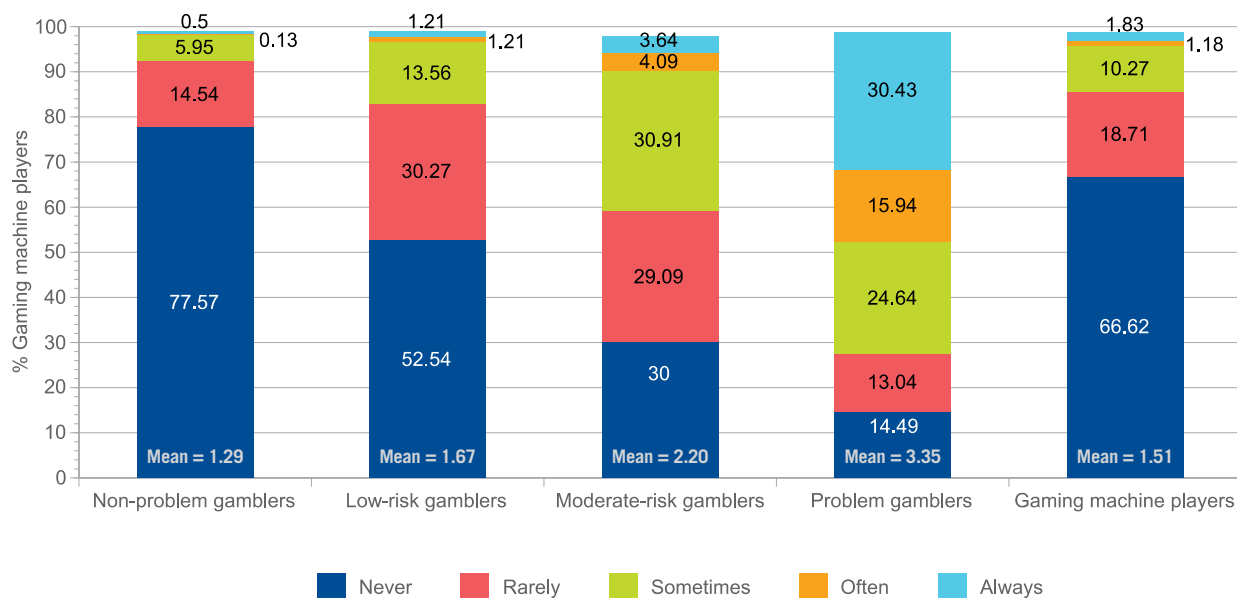
Market research shows that gamblers have difficulty conceiving of at-risk gambling, and that they define gambling as either responsible or problem gambling.

However, there is evidence that low and moderate-risk gamblers behave in ways that are not consistent with responsible gambling. For example, as shown below, rates of limit-setting decline as risk for problem gambling increases.



**Figure 1: How often gaming machine players set a spend or money limit in the past 12 months (extract from Hare 2015)**

Similarly, low and moderate-risk gamblers are much more likely to breach their limits than non-problem gamblers.



**Figure 2: How often gaming machine players exceeded their spend or money limit in the past 12 months (extract from Hare 2015)**

There is evidence that this tendency for low and moderate-risk gamblers to exceed their limit also occurs in gamblers using wagering products (McDonnell-Phillips Pty Ltd 2006).

## Considering harm in defining responsible gambling

If we are to accept and focus on a broader definition of harm, it is clear that the current usage and understanding of the term 'responsible gambling' will need to change. It may need to be clearly articulated that the focus of responsible gambling is reducing gambling harm, rather than reducing or preventing problem gambling. The behaviours that are associated with responsible provision and responsible consumption of gambling will need to be updated to be more relevant to low and moderate-risk gamblers.

Changing our understanding of responsible provision of gambling along these lines forms part of a broader discussion about implementing a public health approach to gambling. Developments in this area will require careful consideration and research. They will need to consider the best ways to influence the behaviours of low and moderate-risk gamblers.

It may need to be clearly articulated that the focus of responsible gambling is reducing gambling harm, rather than reducing or preventing problem gambling.

On the other hand, promotions of responsible consumption of gambling are the most common means by which gamblers learn to use and understand responsible gambling. Communications with gamblers will need to focus more on behaviours that low and moderate-risk gamblers accept as relevant to them. This may require a greater focus on specific behaviours, such as limit-setting. It may also require putting more content into concepts such as responsibility and control, which are currently subjective and rely on gamblers' own perceptions. Evidence indicates that low and moderate-risk gamblers currently have insufficient subjective knowledge to protect them from harms.

Fostering responsible gambling would reasonably include providing information to gamblers about how to minimise the risk of harm – evidence-based information regarding what responsible limits and controls are likely to be.

# RESPONSIBLE CONSUMPTION OF GAMBLING: BEHAVIOURAL PERSPECTIVES

Responsible consumption of gambling is often defined in terms of particular behaviours. This section outlines the evidence on behaviours that are associated with responsible gambling.

## Behavioural indicators of responsible gambling

Definitions of responsible consumption of gambling have focused around fairly general descriptions of behaviour. These include setting limits, avoiding chasing losses and understanding that outcomes are random. A full list of indicators is in Figure 3, which is taken from Hing et al. (2016).

**Figure 3. Behavioural indicators of responsible gambling (Hing 2016)**

<b>Ensuring gambling expenditure is affordable</b>	
1. Only gamble with money that is not needed for necessities such as bills, rent, food etc.	21. Set and stick to a limit on how long you gamble for each session
2. Avoid borrowing money or getting money on credit (including credit cards) to gamble with	22. Take frequent breaks when gambling
3. Only gamble what you can afford to lose	<b>Understanding gambling</b>
4. Set an affordable gambling budget	23. Understand that gambling outcomes are affected by chance – that any skill will not ensure a win
5. Set deposit limits for internet gambling accounts	24. Understand that gambling for longer makes no difference to your chances of winning
6. Use only online gambling websites with daily spend limits	25. Understand that feeling lucky makes no difference to your chances of winning
<b>Keeping gambling in balance</b>	26. Expect to lose when gambling
7. Ensure that you gamble in a way that does not cause harm or problems for other individuals	27. Understand that you cannot win money from gambling in the long run
8. Ensure that gambling doesn't dominate your leisure time	28. Ensure that you do not overestimate your skill at gambling
9. Ensure that gambling doesn't dominate your thoughts when you are not gambling	29. Understand the odds before you gamble
10. Engage in other leisure activities, hobbies or interests other than gambling	30. Think about the possible negative consequences of gambling
11. Prioritise your responsibilities (e.g., to family, friends, work, study) over gambling	31. Read the fine print on promotions before you enter them
<b>Limiting persistence at gambling</b>	32. Think about how long it took to save the money that you use to gamble
12. Avoid chasing losses when gambling	33. Think about how you feel when your gambling money is gone
13. Avoid increasing bets when losing	34. Think about other things that the money spent on gambling could be used for
14. Set and stick to a limit on how much money you spend when you gamble	<b>'Positive' motivations for gambling</b>
15. Avoid increasing bets when winning	35. Avoid gambling to pay bills
16. Avoid betting on every race/sport/other gambling outcome	36. Avoid gambling in order to make money
17. Avoid having multiple online gambling accounts	37. Only gamble for entertainment/fun/pleasure
18. Set and stick to a limit on your maximum bet size when you gamble	38. Avoid gambling when you feel depressed or upset
19. Set and stick to a limit on how often you gamble	39. Avoid taking gambling too seriously, as it is just a game
20. Cash out all or a portion of winnings and don't gamble those winnings later in the session	40. Avoid gambling to impress or challenge other people
	41. Avoid gambling to relieve boredom



<b>A planned approach to gambling</b>
42. Avoid gambling when affected by alcohol or recreational drugs
43. Don't give into peer pressure to gamble
44. Avoid gambling with heavy gamblers
45. Avoid gambling in the heat of the moment
46. Avoid being tempted to gamble by advertisements or promotions
<b>Use help and support if needed</b>
47. Seek professional gambling help if needed
48. Self-exclude from gambling venues and/or websites if needed
49. Block online gambling websites if needed
50. Have someone in your life who you can talk to openly about gambling
51. Develop a support network

## Proposals for limits on gambling behaviour

In other areas of public health, authorities have established daily or weekly limits for consumption. For example, the National Health and Medical Research Council (2015) recommends that healthy adults consume no more than two standard alcoholic drinks a day, and no more than four standard drinks on any one occasion.

In Canada, research has been conducted to establish similar limits for gambling. Currie et al. (2012) suggest the following limits for consumption to minimise the risk of harm:

- gambling no more than three times per month
- spending no more than A\$1000 per year (\$20 per week) on gambling
- spending less than one per cent of gross income on gambling.

There is a need to reproduce this study in the Australian context. The foundation is funding a study, led by Associate Professor Nicki Dowling of Deakin University, to calculate limits based on Australian data. This study is due for publication in late 2017.

# CONCLUSION

Responsible gambling programs have a long history in Victoria. They include programs both for the responsible provision of gambling, such as the removal of ATMs and the YourPlay pre-commitment system, and those that promote the responsible consumption of gambling.

There are opportunities to improve the responsible provision of wagering products. One way to do this would be to introduce national schemes for self-exclusion and pre-commitment. The absence of such schemes is in contrast with the high level of regulation governing responsible provision for other gambling products.

Responsible gambling initiatives play an important role in reducing gambling harm in Victoria. However, recent findings on harm to low and moderate-risk gamblers show that discussions of responsible gambling need to change. They need to focus more on low and moderate-risk gamblers, as 85 per cent of the harm from gambling in Victoria is related to these groups. At the same time, evidence that these groups do not always set or stick to limits indicates they may not be gambling responsibly.

However, both the available research and the foundation's market research suggest that promoting responsible gambling is not effective in reaching these groups. Low and moderate-risk gamblers already believe their gambling to be responsible and controlled. In particular, literal messages stating that people should gamble responsibly are not effective. Using behavioural indicators, such as focusing on limit-setting, may be more effective in reaching these groups.

There is a need to further consider the evidence base on responsible gambling, and how it can be used to improve communication to gamblers.

In terms of responsible gambling behaviours, it is clear that those who gamble in the non-risk category need little information about how to gamble responsibly. It is likely that messages around maintaining control, setting limits and sticking to them only confirm what people in this category already do. Moreover, the secret of success for these people lies in how they do those things.

However, it is also clear that, for many in the low-risk, moderate-risk and problem gambling categories:

- the responsible gambling messages are not getting through or
- they lack sufficient content knowledge to act as a check against behaviour that is resulting in harm.

There is a need to further consider the evidence base on responsible gambling, and how it can be used to improve communication to gamblers.

Improvements in responsible gambling, as a basis for reduced harm, involve creating changes in how those in the gambling risk groups think about their gambling and how they gamble. Such improvements may be found in changing gamblers' knowledge as well as providing them with better environments in which to stay in control when they gamble.

# BIBLIOGRAPHY

Blaszczynski, A, Collins, P, Fong, D, Ladouceur, R, Nower, L, Shaffer, HJ, Tavares, H & Venisse, JL 2011, 'Responsible gambling: general principles and minimal requirements', *Journal of Gambling Studies*, vol. 27, no. 4, pp. 565–73.

Blaszczynski, A, Ladouceur, R & Shaffer, HJ 2004, 'A science-based framework for responsible gambling: the Reno model', *Journal of Gambling Studies*, vol. 20, no. 3, pp. 301–17.

Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, *Assessing gambling-related harm in Victoria: a public health perspective*, Victorian Responsible Gambling Foundation, Melbourne.

*Casino Control Act 1991* (Vic.)

Currie, SR, Hodgins, DC, Casey, DM, el-Guebaly, N, Smith, GJ, Williams, RJ, Schopflocher, DP & Wood, RT 2012, 'Examining the predictive validity of low-risk gambling limits with longitudinal data', *Addiction*, vol. 107, no. 2, pp. 400–06.

Department of Social Services 2016, *Australian/New Zealand gaming machine national standard 2015, a national snapshot of harm minimisation strategies*, Canberra.

Financial Counselling Australia 2016, *Problem gambling financial counselling*, Melbourne.

*Gambling Regulation Act 2003* (Vic.)

Hare, S 2015, *Study of gambling and health in Victoria: findings from the Victorian prevalence study 2014*, Victorian Responsible Gambling Foundation and Victorian Department of Justice and Regulation, Melbourne.

Hing, N 2003, 'Principles, processes and practices in responsible provision of gambling: a conceptual discussion', *UNLV Gaming Research & Review Journal*, vol. 7, no 1, pp. 33–47.

Hing, N, Russell, A & Hronis, A 2016, *Behavioural indicators of responsible gambling consumption*, Victorian Responsible Gambling Foundation, Melbourne.

*Interactive Gambling Act 2001* (Cwlth)

McDonnell-Phillips Pty Ltd 2006, *Analysis of gambler pre-commitment behaviour*, Melbourne.

Miller, HE, Thomas, SL, Smith, KM & Robinson, P 2016, 'Surveillance, responsibility and control: an analysis of government and industry discourses about "problem" and "responsible" gambling', *Addiction Research & Theory*, vol. 24, no. 2, pp.163–76.

National Health and Medical Research Council 2015, *Australian guidelines to reduce health risks from drinking alcohol*, Canberra.

O'Farrell, B 2016, *Review of illegal offshore wagering*, Department of Social Services, Canberra.

Perkins, HW, Linkenbach, JW, Lewis, MA & Neighbors, C 2010, 'Effectiveness of social norms media marketing in reducing drinking and driving: a statewide campaign', *Addictive Behaviors*, vol. 35, no. 10, pp. 866–74.

Thomas, A, Pfeifer, J, Moore, S, Meyer, D, Yap, L & Armstrong, A 2013a, *Evaluation of the removal of ATMs from gaming venues in Victoria, Australia*, Department of Justice, Melbourne.

Thomas, SL, Lewis, S, Westberg, K & Derevensky, JL 2013b, 'What influences the beliefs, behaviours and consumption patterns of "moderate risk" gamblers?', *International Journal of Mental Health and Addiction*, vol. 11, no. 4, pp. 474–89.

*Victorian Responsible Gambling Foundation Act 2011* (Vic.)

Victorian Responsible Gambling Foundation 2016, *Venue best practice guide*, Melbourne.

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