

Independent Gambling Authority

Wagering and EGM gambling

2 June 2017

Prepared by: ORIMA Research & MINT Research

Client contact: szymon.duniec@orima.com

Melbourne Canberra Sydney
www.orima.com

Copyright notice

© Independent Gambling Authority, 2017

This publication is copyright.

The Independent Gambling Authority is an incorporated instrumentality of the Crown in right of South Australia.

Except as permitted under the Copyright Act 1968 (Commonwealth) or otherwise set out in this copyright notice, no part of this publication may be reproduced in any form or by any means, electronic or mechanical, or stored electronically in any form without prior permission in writing from the copyright holder.

This publication is intended for use in the public domain. It may be copied (including being copied electronically and stored as a computer file) provided that it is copied in its entirety, that it is not materially altered and that no fee (other than a fee reasonably referable to actual cost of copying) is charged).

All rights reserved.

ISBN: 978-1-921070-83-9 (online)



Independent Gambling Authority
Level 4
45 Grenfell Street Adelaide
Post Office Box 67
Rundle Mall South Australia 5000
+ 61 8 8226 7233 (voice)
+ 61 8 8226 7247 (facsimile)
www.iga.sa.gov.au
iga@iga.sa.gov.au

Table of Contents

Executive Summary	5
I. Introduction	9
A. <i>Background</i>	9
B. <i>Research objectives</i>	11
C. <i>Research methodology</i>	12
D. <i>Presentation of findings</i>	15
E. <i>Glossary</i>	17
F. <i>Quality assurance</i>	18
II. Perceptions of gambling in South Australia.....	19
A. <i>About this chapter</i>	19
B. <i>Perceptions of gambling prevalence</i>	19
C. <i>Perceptions of who gambles</i>	20
D. <i>Perceptions of changes in gambling over time</i>	20
E. <i>Perceptions of problem gambling</i>	21
F. <i>Awareness and usage of gambling help services</i>	22
III. Drivers of overspending / excessive gambling and moderation strategies	23
A. <i>About this chapter</i>	23
B. <i>Key findings</i>	23
C. <i>Key drivers of overspending and/or excessive gambling</i>	23
D. <i>Barriers to overspending / excessive gambling and moderation strategies</i>	28
IV. Differences between gambling types	30
A. <i>About this chapter</i>	30
B. <i>Overall findings</i>	30
C. <i>Modes of gambling</i>	30
D. <i>Payment methods</i>	34
E. <i>Requirements for participation</i>	35
F. <i>Transparency of risk</i>	35
G. <i>Perceived level of personal control</i>	36
H. <i>Stigma</i>	36
V. Awareness and perceptions of gambling regulations in South Australia	38

A. About this chapter.....	38
B. Overall findings	38
C. In-venue regulations – gambler exposure and impact	39
D. In venue regulations – community perspectives.....	40
E. Online account regulations – gambler exposure and impact	41
F. Online account regulations – community perspectives	42
VI. Community awareness and perceptions of gambling advertising and education in South Australia.....	45
A. About this chapter.....	45
B. Recall and perceptions of gambling industry advertising.....	45
C. Impacts of industry advertising.....	46
D. Perceptions of current advertising restrictions.....	47
E. Perceptions of mandatory warning messages.....	48
F. Public education.....	49
VII. Implications for gambling regulation	51
A. About this chapter.....	51
B. Overall findings	51
C. Advertising regulations	51
D. Online and account-based regulations	52
E. Perceived difficulties in implementing online reforms.....	56
VIII. Conclusions	58

Appendix A – Technical Appendix**Appendix B – Discussion Guides****Appendix C – Recruitment Screeners****Appendix D – Stimulus Tested in Focus Groups**

Executive Summary

Background and objectives

The gambling environment in South Australia has been changing in recent years, with strong growth in sports wagering / betting. Additionally, there has been a substantial increase in interactive (online) gambling as a mode of access for sports wagering.

Given that substantial components of the existing regulatory framework were initially developed in response to Electronic Gaming Machine (EGM) gambling, it is unclear if the current regulation of wagering gambling in South Australia is adequate.

As such, the Independent Gambling Authority (IGA) commissioned ORIMA Research and Mint Research to undertake research to determine:

- ◆ The adequacy of existing codes of practice to address the changing landscape of wagering gambling, and the differences between wagering and EGM gambling;
- ◆ Whether differential regulatory approaches to wagering versus EGM gambling products were required; and
- ◆ Whether the current regulations regarding advertising and marketing of wagering products were properly directed.

Research methodology

The research was conducted with South Australian EGM and wagering gamblers and the South Australian general public. The methodology was qualitative in nature and was conducted with participants across metropolitan Adelaide and regional South Australia.

A total of 106 people participated in the research, which was conducted over two stages, comprising 45 in-depth interviews with EGM and wagering gamblers (Stage 1) and 8 focus groups with general public participants (Stage 2) between 4 and 27 October 2016.

Key research findings

Perceptions of gambling in South Australia

Overall, the research identified a perceived increase amongst participants in the prevalence of online wagering in South Australia, and a perception that there was “too much” online wagering advertising. Findings suggest that this advertising may be more likely to have an immediate behavioural impact on consumers than advertising of terrestrial gambling as it allowed them to act immediately (e.g. signing up to an online account and placing a bet via a mobile device).

Drivers of overspending / excessive gambling

Overall, while there were some commonalities between EGM and wagering in relation to the drivers / motivators to excessive gambling / overspending, the research also identified some clear differences between the two.

The following were **reported by EGM consumers** (and not by wagering consumers):

- ◆ Gambling too much after stressful events, or when feeling highly stressed; and
- ◆ Post justifying and rationalising their reasons for continuing to play, which encouraged further spending.

The following drivers of overspending / excessive gambling were identified **in relation to wagering** (and not EGM gambling):

- ◆ The element of urgency (due to event start times) which was reported to have, at times, induced consumers to bet rashly / in an uninformed manner;
- ◆ Overspending by placing spontaneous bets in reaction to a loss;
- ◆ The availability and accessibility of online wagering accounts;
- ◆ Difficult and lengthy processes to withdraw funds from online accounts; and
- ◆ Product innovation and the variety of “exotic bets” available via online wagering.

Moderation strategies employed by gamblers

Specific strategies reported by terrestrial consumers (EGM and wagering) for moderating their gambling behaviour included:

- ◆ Only taking a set amount of money to the venue – based on what they would be willing to lose;
- ◆ Leaving credit cards at home;
- ◆ Keeping track of time – via their own watch, or on the screen;
- ◆ Gambling with a friend – who would then encourage them to stop;
- ◆ Self-exclusion; and
- ◆ Only reinvesting winnings, and not gambling with additional funds.

Participants with online wagering accounts reported using the following strategies to moderate their behaviour:

- ◆ Setting deposit limits – based on what they were willing to lose;
- ◆ “Flushing” their account at the end of a certain period – i.e. removing all the winnings;
- ◆ Banning themselves from using their account for a certain period of time after a loss and / or behaviour that they perceived as irrational; and

- ◆ Purposely not linking their credit card to the account.

Other key differences between gambling types

Overall, the research identified a range of other key differences between EGM and wagering gambling, as well as online and terrestrial gambling. These included:

- ◆ **The mode of gambling.** Specifically, that wagering tended to be conducted online, and offered a wider variety of bet types (including the ability to place multiple bets simultaneously);
- ◆ **Payment methods** – online wagering allowed credit cards to be linked to accounts;
- ◆ **Pay-out methods** – participants reported online winnings often remained in their accounts and could be “difficult” to withdraw;
- ◆ **The requirements for participation** in gambling, including:
 - Providing proof-of-age identification at terrestrial venues – some participants reported not having to do this when gambling online;
 - The requirement to have an account / membership when gambling with online providers, compared to terrestrial venues where participants could “walk away” at any time;
- ◆ **The transparency of the risk** involved – participants felt wagering was more transparent, as the odds were publicly available and set before the start of the event;
- ◆ **The perceived level of personal control over the outcome** of gambling – participants felt that wagering involved a level of skill / knowledge, while EGM gambling was perceived to be “pure chance”; and
- ◆ **The level of stigma** – the research identified a stigma associated with playing EGMs that was not present in relation to wagering gambling.

The research findings suggest that these key differences impacted participants’ gambling behaviours.

Options for regulatory revisions

The above findings, coupled with the increasing prevalence of online wagering in South Australia, support the need for a review of the regulatory framework.

The research identified a number of possible regulatory revisions and broader public policy responses to address the differences between EGM and wagering gambling and the perceptions and expectations of the general public in South Australia.

Potential changes relating to advertising include:

- ◆ Tightening blackout periods in relation to television and radio advertising (acknowledging advertising would be difficult to regulate online) – most research participants were in support of this, mainly due to the perceived unnecessary

exposure of children to gambling advertising at times and on channels where they would typically be tuned in; and

- ◆ Producing government responsible gambling advertising campaigns to offset and counteract industry advertising – there was strong agreement that this would likely assist at-risk gamblers to self-identify, and prompt some to moderate their behaviour or seek support.

Potential changes to online account-based regulations include:

- ◆ Banning of gambling with credit;
- ◆ Requiring explicit display of the consumer's net financial position (e.g. annual or total) on all key pages (including on apps and gambling websites);
- ◆ Quick online account closure;
- ◆ Sweeping of accounts to remove positive balances from accounts at the end of the day;
- ◆ Voluntary time-outs and account lock-outs;
- ◆ Identification of consumers gambling above their average and installing additional steps to proceed;
- ◆ Tagging of problem gamblers;
- ◆ Rigorous identification checking; and
- ◆ Restricting certain online products and features (e.g. the “multi-builder” and “cash out” features).

I. Introduction

A. Background

The Australian gambling environment is changing. While electronic gaming machine (EGM) expenditure continues to account for the majority of gambling expenditure, this is gradually plateauing. Parallel to this, the data shows recent growth in sports wagering and transitions to different modes of gambling among Australians (e.g. interactive gambling), although these forms still comprise relatively small components of gambling expenditure as a whole.

Similarly, in recent years South Australia has seen strong growth in sports wagering / betting. Total expenditure on horse and dog racing (where data are available) also shows a mild increase over time. Further, a key changing trend is the mode of access for sports wagering, which has been found to encompass a substantial increase in interactive (online) gambling over recent years.

Sports betting and race wagering now represent the largest interactive gambling markets, with substantial growth attributed to existing customers transitioning to interactive modes from both retail and telephone betting. This is thought to be driving a change in the demographic profile of gamblers in South Australia, as well as nationally.

In addition, while relatively few interactive gamblers currently prefer gambling via mobile devices and digital television, this may change as mobile app / platforms become more sophisticated and offer greater features and improved security.

Alongside the increase in sports and race wagering and the transitioning to interactive modes of gambling, the promotion of wagering gambling, particularly sports wagering, has also increased since 2008.

The Independent Gambling Authority (IGA) is responsible for regulating commercial gambling in South Australia. Its statutory charter deals with the impact on the community of commercial gambling. This includes the approval and, at times, alteration of mandatory advertising and responsible gambling codes of practice to minimise gambling harm and reduce problem gambling.

The gambling industry in South Australia is regulated by various pieces of legislation and industry Codes of Practice to which the industry is expected to adhere¹.

In May 2013, the Minister for Business Services and Consumers introduced a Bill to the South Australian Parliament to amend all of South Australia's gambling-related Acts.

The IGA published a new set of codes of practice (the codes) on 18 December 2013 which consolidated previous codes of practice into one document (effective 1 March 2014). These reforms for all forms of gambling made improvements to regulatory measures aimed at reducing the harm from problem gambling in the South Australian community.

Substantial components of the existing regulatory framework were initially developed in response to EGM gambling (the gambling product with the highest share of total gambling expenditure) and then varied to accommodate wagering.

Given the recent growth in sports wagering gambling and online wagering (on both sports and horse/dog races), it is unclear if the current regulation of wagering gambling in South Australia is adequate.

The IGA commissioned ORIMA Research and Mint Research to undertake research with South Australian gamblers and the South Australian general public to inform decision-making around what the South Australian regulation should look like for wagering gambling in the state.

¹ Including: the Authorised Betting Operations Act (2000), the Casino Act (1997), the Gaming Machines Act (1992), the Independent Gambling Authority Act (1995), the Lottery and Gaming Act (1936), and State Lotteries Act (1966), and the Gambling Codes of Practice Notice 2013.

B. Research objectives

The key objectives of the research were to determine:

- ◆ The adequacy of existing codes of practice to address the changing landscape of wagering gambling, and the differences between wagering and EGM gambling;
- ◆ Whether differential regulatory approaches to wagering versus EGM gambling products were required; and
- ◆ Whether the current regulations regarding advertising and marketing of wagering products were properly directed.

More specifically, amongst the general public in South Australia, the research sought to:

- ◆ Explore perspectives of gambling in relation to:
 - Forms of gambling (i.e. EGM gambling and wagering);
 - Gambling modes (i.e. retail, phone, and interactive); and
 - People who gamble;
- ◆ Explore reactions and expectations in relation to gambling industry advertising and conduct; and
- ◆ Determine the reaction to, and level of support for, the current regulations.

Additionally, the research sought to understand gambling behaviours to assess what effective regulation could look like. As such, research with EGM and wagering gambling consumers sought to:

- ◆ Determine the differences in perceptions and behaviours between gambling types (i.e. EGM and wagering gambling);
- ◆ Identify and explore differences in gambling modes (i.e. interactive / online versus terrestrial wagering);
- ◆ Explore the effect of industry advertising of wagering and EGM products on consumer behaviours; and

- ◆ Assess the impact of current legislation on gambling behaviour.

C. Research methodology

A total of 106 people participated in the research, which was conducted between 4 and 27 October 2016 via 60-minute qualitative interviews and focus groups.

Research was conducted with:

- ◆ EGM and wagering gambling consumers; and
- ◆ The South Australian general public.

This comprised two stages of research:

- ◆ **Stage 1**—45 x 60 minute qualitative interviews with South Australian EGM and wagering gamblers, including:
 - 30 x face-to-face interview in metropolitan Adelaide; and
 - 15 x telephone interviews in regional areas of South Australia;
- ◆ **Stage 2**—8 x 60 minute qualitative focus groups with members of the South Australian general public, including:
 - 6 x face-to-face focus groups with metropolitan Adelaide-based participants; and
 - 2 x online focus groups with regionally-based participants.

Prior to commencement of the research, ethical approval was sought from Bellberry Limited (a not-for-profit Human Research Ethics Committee in Eastwood, South Australia).

An online application, including all research instruments, was submitted in accordance with Bellberry's protocol, on 11 August 2016. Approval was granted on 20 September 2016.

Stage 1

Interviews were conducted with South Australians who had engaged in EGM gambling and / or wagering (e.g. sports betting or racing) at least once in the previous 12 months.

A total of 15 interviews were conducted with EGM gamblers, 15 with wagering gamblers, and 15 with gamblers who took part in both forms of gambling.

Across the 45 interviews, a mix of frequency of gambling, age and gender was achieved.

Gamblers also completed questions (using the Problem Gambling Severity Index), to determine their risk status in relation to problem gambling.

Across the 45 interviews:

- ◆ 33 were non-problem gamblers, with varying frequencies of gambling, 9 of whom were frequent gamblers;
- ◆ 5 were low risk gamblers, all of whom were frequent gamblers;
- ◆ 4 were moderate risk gamblers, a mix of frequent and non-frequent gamblers; and
- ◆ 3 were recovered problem gamblers, all still frequent gamblers.

Half (n=15) of the wagering (and wagering / EGM) gamblers used online gambling modes (or a mix of both venue and online modes).

Participants were remunerated for their time and participation with a \$70 Coles Myer gift voucher.

Risk management

In order to mitigate and manage risk within this potentially vulnerable segment of the population, informed consent to participate was sought from all participants prior to interview commencement.

It was emphasised to each participant that participation was voluntary and they were able to withdraw at any time without any adverse consequences. Each participant

received a consent form and participant information sheet prior to their participation in the study. They were provided with a personal copy of the participant information sheet after the conclusion of the interview.

As a matter of course, all gamblers were provided with gambling assistance information at the end of the recruitment telephone interview, as well as at the end of the face-to-face or telephone field interview, including:

- ◆ Telephone helpline—the Gambling Helpline free call number (1800 858 858);
- ◆ A list of free online gambling assistance resources and information;
 - www.problemgambling.sa.gov.au;
 - www.gamblinghelponline.org.au; and
 - www.problemgambling.gov.au/resources; and
- ◆ Face-to-face gambling help services appropriate to the participant's location and cultural background.

Stage 2

Each focus group comprised 6-8 members of the South Australian general public, with a mix of gender in each group. To account for key demographic variables that could influence public perception of gambling, groups were segmented by:

- ◆ Age (18-29 years, 30-49 years, 50+ years);
 - Two metropolitan groups were undertaken with each age group;
- ◆ Socio-economic status; and
- ◆ Location of residence.

Further to these criteria, a gambling frequency restriction was set, such that no more than two 'frequent gamblers' and two 'gamblers' were recruited in total per group (with the remainder comprising 'non-gamblers').

Focus groups were 1 hour in duration and participants were remunerated with a \$60 Coles Myer gift voucher for face-to-face groups, and a \$50 Coles Myer gift voucher for participation in online groups.

Group participants were provided with the same consent form and participant information sheet as those provided for the interviews.

So as to gauge their reactions to current gambling regulations, participants in focus groups were shown elements of the Gambling Codes of Practice, Notice 2013, Version No. 008, as at 1 July 2016. The regulations selected to test were based on what consumers and the general public have an opportunity to see or interact with (and are presented in Appendix D).

In addition, information and evidence from Stage 1 of the research was used to form the basis for potential areas of additional regulation. These were also tested in the focus groups.

More detail of the research methodology is provided in a technical appendix which can be found in Appendix A.

Other research instruments used (including recruitment screeners, interview and discussion guides) have been appended to this report.

D. Presentation of findings

The research was qualitative in nature and hence, the results and findings are presented in a qualitative manner. This research approach does not allow for the exact number of participants holding a particular view on individual issues to be measured. This report, therefore, provides an indication of themes and reactions among research participants rather than exact proportions of participants who felt a certain way.

The following terms used in the report provide a qualitative indication and approximation of size of the target audience who held particular views:

- ◆ Most—refers to findings that relate to more than three quarters of the research participants;
- ◆ Many—refers to findings that relate to more than half of the research participants;
- ◆ Some—refers to findings that relate to around a third of the research participants; and

- ◆ A few—refers to findings that relate to less than a quarter of research participants.

Gambler segment terms used in the report have been defined as follows:

- ◆ Gambler—defined as those having engaged in a gambling activity (in the case of this study, EGM and/or wagering gambling) within the past 12 months;
- ◆ Non-gambler—defined as those who have not partaken in these gambling activities in the past 12 months;
 - For the purpose of this study, the definition of a “gambler” versus a “non-gambler” is based on those used in prevalence studies.

We have adopted the following gambling segment definitions used by the Office for Problem Gambling in the 2012 South Australian Gambling Prevalence Study (Office for Problem Gambling, 2013).

- ◆ Problem gambler—defined as those who have experienced adverse consequences as a result of their gambling and who may have lost control of their gambling behaviour. Involvement in gambling may be at any level, but is likely to be heavy. Score of 8 or more on the Problem Gambling Severity Index (PGSI);
- ◆ Non-problem gambler—those who have responded ‘never’ to all of the indicators of behavioural problems (score 0 on the PGSI). May still be frequent gamblers with heavy involvement in gambling in terms of time and money, but they will not have experienced any adverse consequences;
- ◆ Moderate risk gambler—those who have responded ‘never’ to most of the indicators of behavioural problems in the PGSI, but who are likely to score on one or more ‘most of the time’ or ‘always’ responses. This group may or may not have experienced adverse consequences from gambling. Moderate risk gamblers have scores of 3 to 7 on the PGSI;
- ◆ Low risk gambler—those who are unlikely to have experienced any adverse consequences from

gambling and will have answered ‘never’ to most of the indicators of behavioural problems in the PGSI. Low risk gamblers have scores of 1 or 2 on the PGSI;

- ◆ At-risk gambler—low or moderate risk gamblers, at risk of problem gambling;
- ◆ Frequent gambler—people who gamble at least once a fortnight on any type of gambling activity apart from lotteries or bingo; and
- ◆ Non-frequent gambler—people who gamble anywhere from at least monthly (but less than fortnightly), to at least once a year.

Differences in this report may be observed by level of risk, and/or frequency of gambling.

The most common findings are reported except in certain situations where only a minority has raised particular issues, but these are nevertheless considered to be important and to have potentially wide-ranging implications / applications.

E. Glossary

Other terms used in the research that relate to EGM and wagering gambling are listed below:

- ◆ Independent Gambling Authority (IGA)—the senior South Australian regulator for commercial forms of gambling.
- ◆ The Codes—the Gambling Codes of Practice Notice 2013
- ◆ EGM—electronic gaming machine
- ◆ Wagering—for the purposes of this report, “wagering” encompasses betting on sports or races
- ◆ Consumer—a person who engages in gambling. This is used interchangeably with “gambler”
- ◆ Industry—gambling services providers
- ◆ Event (in wagering context)—race / sports match / game
- ◆ Socio-economic status (SES)—an indicator of affluence, based on a widely-recognised proxy

(household income in this instance)

- ◆ Ad—advertisement
- ◆ Problem Gambling Severity Index (PGSI)—a standard set of nine questions to ascertain whether or not a person has a serious gambling problem. A part of the Canadian Problem Gambling Index (CPGI).

F. Quality assurance

The project was conducted in accordance with international quality standard ISO 20252 and the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)*.

II. Perceptions of gambling in South Australia

A. About this chapter

This chapter discusses participants' perceptions of gambling in South Australia, including its prevalence, how it has changed over time and who engages in gambling. It also discusses perceptions of problem gambling and awareness and usage of gambling support services.

B. Perceptions of gambling prevalence

Overall, the research identified mixed opinions about what forms of gambling were most prevalent in South Australia.

Most older and regional participants perceived EGM gambling to be the most prevalent form of gambling. However, many of these participants felt that wagering gambling was becoming more prevalent, particularly as technology allowed greater access to, and convenience in relation to wagering.

"In comparison to the pokies, I don't think sports betting is as popular. It's more niche – I don't think as many people do it." – Male, 30-39, wagering and EGM consumer, regional SA

These participants' belief of a higher prevalence of EGM gambling was driven by:

- ◆ Personal experience (i.e. friends, acquaintances or self-engaging in EGM gambling);
- ◆ News articles relating to EGM gambling (particularly in relation to Senator Nick Xenophon's concerns and policies);
- ◆ Hotel advertisements (particularly in regional locations) showing EGMs; and
- ◆ Observations of a large number of people playing EGMs at pubs / clubs (particularly in comparison to the TAB).

In contrast, younger and middle-aged participants were divided in their perceptions of the prevalence of various forms of gambling, with many unsure or believing that the prevalence of wagering was higher than EGM gambling. Reasons for this belief included:

- ◆ Strong presence of industry advertising related to wagering;

- ◆ Strong presence of radio and television commentary about wagering;
- ◆ Personal experience (i.e. friends, acquaintances or self-engaging in wagering gambling); and
- ◆ The observation of a “changing vernacular” when hearing or conversing about sport (e.g. discussion of “odds”).

C. Perceptions of who gambles

Participants felt that wagering gambling predominantly attracted younger to middle-aged male gamblers, due to greater interest and engagement with the associated sports amongst these groups. Participants felt this was reflected in the current sports betting advertising, which was perceived to be aimed at this cohort.

In contrast, EGM gambling was felt to have a more varied cohort of users, including both males and females. Participants also felt that EGM players were more likely to be:

- ◆ Older;
- ◆ “Lonely”, have “life problems” they were seeking to avoid and / or have a gambling addiction; and
- ◆ Engaging in gambling behaviours more frequently.

D. Perceptions of changes in gambling over time

The research explored gambler participants’ perceptions in relation to changes to gambling in South Australia over time. Overall, participants perceived that the key changes to the gambling environment in South Australia were an increase in the prevalence of wagering gambling, as well as a rapid increase in the presence of online account-based gambling.

Findings suggest that contributing factors to this perception may include:

- ◆ The high prevalence of advertisements for online gambling accounts;

- ◆ A perceived increase in the number of providers (including international providers) of online wagering; and
- ◆ Consumer participants using and / or having conversations about or witnessing their friends using these accounts.

In addition, EGM consumer participants perceived there to have been a change over time in the way in which EGMs pay out. Many of these participants believed EGMs are now geared to pay out smaller amounts more frequently, (instead paying out larger “jackpots” less frequently), changing the probability and reinforcement of this style of gambling.

E. Perceptions of problem gambling

The research findings are suggestive of limited understanding amongst most consumer participants about what the indicators for problem gambling were, especially in the early stages, and who could be a problem gambler.

“I know you have problem gambling on the TAB, but I associate problem gamblers more with the pokies.” – Male, 60+, wagering consumer, regional SA

While participants were aware that gambling problems could be experienced from any form of gambling, most felt that problem gambling was more closely associated with EGM gambling than wagering gambling.

General community participants felt that wagering gambling had a lower risk of developing into problem gambling behaviour, as it was contained within the set duration of the event / sports match. As such, these participants felt it would be more difficult than with EGMs to “lose track of time” and play for extended periods.

However, participants had concerns about the increased access to, and promotion of, wagering gambling for younger sports fans, as they felt this may have a potential detrimental impact and / or cause gambling problems in the future.

The research identified strong perceptions that gambling was only an issue that required moderation or intervention / treatment when a gambler was betting more than they could afford. Even then, most participants felt it was only

serious if the home / family life of the gambler was negatively impacted.

F. Awareness and usage of gambling help services

The research showed that, on prompting, participants could recall seeing information about help services. However, the only sources participants could recall included:

- ◆ In-venue posters; and
- ◆ Newspaper and / or magazine articles – including those about Nick Xenophon’s anti-EGM lobby.

There was limited specific recall of:

- ◆ The organisations involved in their dispersal; and
- ◆ The range of help services they provided.

Only a few consumer participants could recall specific organisations that provided help services, namely Wesley United and ‘Gamblers Anonymous’.

Of the recovered problem gambler participants, none had sought help as a result of seeing responsible gambling information or communications provided by industry or government, and none had used the Gambling Helpline. Instead, these participants reported self-identifying and modifying their gambling behaviour, with some seeking support / assistance from family / friends. One participant reported having sought help from a registered psychologist.

Other participants reported that, due to their lack of awareness of specific help services, if they required assistance moderating their own gambling behaviour they would likely seek information via an online search engine.

III. Drivers of overspending / excessive gambling and moderation strategies

A. About this chapter

This chapter discusses the drivers of, and barriers to, overspending on gambling / gambling excessively. It also discusses strategies used by gamblers to moderate their behaviour. Findings are drawn from the interviews with wagering and EGM gamblers.

B. Key findings

Overall, while there were some commonalities between EGM gambling and wagering in relation to the drivers / motivators to excessive gambling / overspending, the research also identified some clear differences between the two.

The research also identified some key differences between terrestrial and online wagering and indicated that online wagering had some unique attributes that encouraged and / or facilitated excessive gambling.

C. Key drivers of overspending and/or excessive gambling

Overall, drivers of overspending and / or excessive gambling were found to be both internal and external to the consumer. The research identified many drivers that were shared across all gambling forms (i.e. EGM and wagering), while others that were specific to one or the other.

The research identified the following **external drivers** to overspending / excessive gambling **across all gambling forms** (i.e. gambling on EGMs and wagering):

- ◆ **A consumer's lifestyle and life-stage** – this influenced the amount of time and money participants had available to spend on gambling;
- Peaks in gambling behaviour tended to occur in gambling after pay day, as well as when participants had more time and less financial

commitments. Many participants also reported that they reduced their gambling behaviours when they got married or had children as they had greater demands on their time and finances;

- ◆ **Social occasions / social environment** – compounding group enthusiasm and peer pressure in social environments was reported to encourage gambling behaviours. These situations occurred both terrestrially and online, and were often reported to involve alcohol consumption, which further intensified gambling;
- ◆ **Seasonal factors** – these increased social engagements, holiday breaks, eating out and income (i.e. for seasonal employment), which also often motivated higher than usual terrestrial and online gambling; and
- ◆ Promotions and inducements – specifically:
 - **For EGM consumers**, loyalty clubs (e.g. Jackpot Club), happy hours and in-venue point promotions may have encouraged higher than usual gambling;
 - **For wagering consumers**, promotions and inducements (e.g. credit offers and in-product promotions) were reported as a contributor to placing bets and / or betting higher amounts;
 - Many wagering participants reported having received credit offers for opening online accounts and betting, with most unaware that such offers and promotions were not permitted in South Australia.

“I’m a diamond member at Adelaide Casino. I get free drinks 24/7... these things do make me gamble more.” – Male, 30-39, wagering and EGM consumer, regional SA

“If a promotion comes up, then I’ll load up my account with \$50, to take advantage of that.” – Male, 50-59, EGM and wagering consumer, regional SA

The research identified the following **internal drivers** to overspending / excessive gambling for EGM consumers and some wagering consumers (often online):

- ◆ **Lack of awareness of net spend** – most gambler participants reported that they did not keep track of their net position in relation to their gambling spend. While some participants with online gambling accounts reported that their recent winning amounts were easily accessible, this was available only in the short-term, and without the context of losses. These participants reported that not knowing their net position reduced the ability for self-reflection, thus increasing their likelihood of

overspending.

- ◆ **Boredom;**
- ◆ **Anxiety** – which could fuel the need to chase a loss; and
- ◆ The **memory of recent wins** – this was regularly a reinforcer (and primary motivator for overspending) for both forms of gambling.

The research also identified some differences in reasons for overspending between EGM and wagering consumers. The following **were reported by EGM consumers** (and not by wagering consumers):

- ◆ Gambling too much after **stressful events**, or when feeling highly stressed – EGM consumers reported that they often gambled excessively / more to “zone out”, dissociate and escape their stressors in these instances; and
- ◆ **Post-justifying and rationalising their reasons for continuing to play**, which encouraged further spending – e.g. the time they had spent on the machine had been significant, so therefore the machine must be “back building” and was likely to pay out a large amount very soon.

“The stress in life. I had a falling out with a friend, and one of the first things I went to was [online EGM] gambling.” – Male, 30-39, wagering and EGM consumer, regional SA

The following reasons for overspending / excessive gambling were reported **in relation to wagering** (and not EGM gambling):

- ◆ The **element of urgency** (due to event start times) which, at times, could induce consumers to bet rashly / in an uninformed manner;
- ◆ Overspending by **placing spontaneous bets in reaction to a loss** – wagering consumers reported that the accessibility of online wagering exacerbated this, as the duration between consideration and the act of wagering was reduced. Many indicated that a small time lapse or break was a sufficient mechanism to interrupt this behaviour;
- ◆ The **availability and accessibility of online wagering accounts** – the convenience and mobility of online betting accounts (especially via mobile phone), as well as the ease of signing up and linking credit cards to these accounts and the anonymity they afforded, was reported to encourage overspending

amongst wagering participants;

- ◆ **Difficult and lengthy processes to withdraw funds from online accounts** – participants indicated that this encouraged them to leave their winnings in their accounts and as a result they spent them on further gambling; and
- ◆ **Product innovation and the variety of “exotic bets” available** via online wagering (e.g. multi-builders) – which attracted and encouraged additional spending amongst those who wanted to try new types of wagering not always available in terrestrial venues.

Learning theory and reinforcement

The literature suggests that operant and classical conditioning theories can account for differences in wagering vs EGM gambling behaviour, via differential schedules of reinforcement.²

EGM gambling occurs on a variable-ratio reinforcement schedule, where positive reinforcement occurs after an unknown number of responses.

As shown in the literature and in interviews with consumers, positive reinforcers are both external and internal to the consumer. Primary external positive reinforcers to the consumer include money or a reward, and the strength of reinforcement is tied to the magnitude of the win. EGM wins are also reinforced by intense sensory activation using lights and sounds. This sensory activation is the cause for many EGM consumers to state that they remember their big wins, while their continual losses often go unnoticed. There is also a negative reinforcement internal to the consumer, including the ability to “escape” from stress states and “zone out”, and a reduction in boredom.

Reinforcement in this manner encourages maintenance of gambling, and associations to be formed between the behaviour and external stimuli such as gambling-related situations, places and times, or internal stimuli such as mood states, physiological arousal or cognitions.

² McConaghy, N. (1980). Behavioural completion mechanisms rather than primary drive maintain behavioural patterns. *Activas Nervosa Superior (Praha)*, 22, 138-151.

Interview findings suggest that the reinforced behaviours are those undertaken in and around the gaming room – e.g. interaction with the machine, changing money, etc.

Wagering gambling is similar but slightly different to EGM gambling. While it is still based on a variable-ratio schedule of reinforcement, it also delivers elements of a fixed-interval schedule, where responses are rewarded after a specified amount of time (i.e. after the conclusion of a game or race), which is a known and measurable quantity to the consumer. However, with the introduction of online account-based gambling, for frequent gamblers the timeframe could be condensed. For example, many frequent gamblers reported placing simultaneous bets on multiple races / games locally, domestically and internationally, something that is not possible given the current venue regulations restricting EGM gambling to one poker machine at a time.

As with EGM gambling, the behavioural reinforcer for wagering gambling is money or reward. Again, findings from interviews show that the magnitude of the win on a single occasion influences the strength of the behavioural reinforcement to a degree.

The research findings show that the reinforced behaviours of wagering gambling include those undertaken in venue, as well as online. Further, there is a greater propensity for leakage of terrestrial wagering to online wagering, and for these reinforced behaviours to occur at any time and any place (e.g. checking mobile device, placing bets online).

While learning theories facilitate understanding of many aspects of the uptake and maintenance of gambling behaviours, the aetiology of problem gambling (i.e. the transition and persistence of this) and why it occurs in only a small proportion of people remains largely unknown.^{3 4}

³ McConaghy, N. (1980). Behavioural completion mechanisms rather than primary drive maintain behavioural patterns. *Activas Nervosa Superior (Praha)*, 22, 138-151.

⁴ APS (2010). Special Report: The psychology of gambling. Australian Psychological Society. Accessed: <https://www.psychology.org.au/publications/inpsych/2010/december/gambling/#s6>

D. Barriers to overspending / excessive gambling and moderation strategies

"I've found gambling with mates helps you stay in control. They question you if you start going overboard." – Male, 30-39, wagering and EGM consumer, regional SA

The research identified the **following barriers to overspending and / or excessive gambling:**

- ◆ **Key influencers** – i.e. having disapproving partners / family members / friends;
- ◆ **Financial commitments** and the desire to spend money on other things in the immediate future;
- ◆ **Exposure to problem gambling** amongst personal connections (i.e. friends or family members);
- ◆ **Life-stage** – as previously mentioned, many participants naturally reduced the amount of their gambling as a result of having greater family and / or work responsibilities;
 - However, it was noted that the increased accessibility of gambling via online accounts was starting to remove this natural barrier; and
- ◆ **Going away on holiday** – for a few participants, this made it more difficult and / or less appealing to access their online accounts or engage in EGM playing.

The research findings suggest that these barriers generally helped less frequent gamblers to moderate their behaviours, without the need for physical intervention or active strategies.

The research showed that higher frequency consumers can be more likely to report setting rules for themselves and implementing strategies to moderate their gambling behaviour. In addition, moderation strategies tended to be more effective in the terrestrial environment than online.

Specific strategies reported by terrestrial consumers (EGM and wagering) for moderating their gambling behaviour included:

- ◆ **Only taking a set amount of money to the venue** – based on what they would be willing to lose;
- ◆ Leaving credit cards at home;
- ◆ **Keeping track of time** – via their own watch, or on the screen;

- ◆ **Gambling with a friend** – who would then encourage them to stop;
- ◆ Self-exclusion; and
- ◆ **Only reinvesting winnings**, and not gambling with additional funds.

In addition, terrestrial environments meant that venue staff could actively assist in moderating problem gambling behaviour via interventions (this is discussed in more detail in Chapter V).

"You don't bet when you're uneducated [about the race/game]." – Male, 20-29, wagering consumer, metro Adelaide

To moderate their behaviours, many wagering consumers reported that they engaged in research before placing a bet (i.e. in an attempt to increase the likelihood of a successful outcome). These participants perceived this to minimise the risk involved and as such, felt that they had greater control.

Participants with online wagering accounts reported using the following strategies to moderate their behaviour:

- ◆ **Setting deposit limits** – based on what they were willing to lose;
- ◆ **"Flushing" their account** at the end of a certain period – i.e. removing all the winnings;
- ◆ **Banning themselves from using their account** for a certain period of time after a loss and / or behaviour that they perceived as irrational; and
- ◆ Purposely not linking their credit card to the account.

"I felt like I was letting my family down... I've had enough. I know I've got an addiction and I've had enough of it." – Female, 50-59, EGM consumer, metro Adelaide

"I'm trying to take the emotions out of it." – Male, 30-39, wagering consumer, metro Adelaide

The research also demonstrated that EGM and wagering consumers often use their emotions differently, as a strategy to manage overspending. Many EGM consumers reported that they actively thought of their family, and / or recalled negative feelings of guilt from previous gambling occasions to motivate themselves to cease gambling. In contrast, wagerers reported that they tried to remove emotion from their betting transactions as they felt that emotions (negative and positive) could lead to irrational and potentially problematic gambling behaviours.

IV. Differences between gambling types

A. About this chapter

This chapter discusses the differences between gambling types – i.e. EGM and wagering, online and terrestrial. It discusses specific differences and the impact of these on gamblers' behaviours. Findings are drawn from the interviews with wagering and EGM gamblers.

B. Overall findings

Overall, the research identified a range of differences between wagering and EGM gambling, including:

- ◆ **The mode of gambling** – i.e. where and how gambling took place;
- ◆ **Payment methods** – i.e. how funds could be deposited and withdrawn;
- ◆ The requirements for participation in gambling;
- ◆ The transparency of the risk involved;
- ◆ **The perceived level of personal control** over the outcome of gambling; and
- ◆ The level of stigma.

Drivers and barriers to excessive gambling, and moderation strategies used to control behaviours were also reported to differ between the forms of gambling, as discussed in Chapter III.

C. Modes of gambling

Overall, participants felt that there were key differences between wagering and EGM gambling in relation to the modes of gambling, specifically:

- ◆ Where gambling could be conducted;
- ◆ The types of bets that could be made; and
- ◆ The rate / speed of gambling results / outcomes.

Participants identified that EGM gambling was typically

conducted in terrestrial venues, with only one consumer participant reporting having played EGMs online. In contrast, participants reported that the majority of wagering gambling was conducted online.

Participants felt that the **types of bets available** to the consumer was a key differentiator between EGM and wagering gambling. Specifically, wagering gambling:

- ◆ **Allowed gamblers to make multiple bets simultaneously** – in contrast to EGM gambling which restricted gamblers to one machine;
- ◆ Offered more ways to bet, specifically:
 - **More events to gamble on** – including a wide range of sports, horse racing and other events (e.g. politics); and
 - **More bet types** – including “exotic” bets. Participants felt the increasing range of betting options indicated that the industry was finding innovative ways to engage consumers (and potential consumers) throughout the game / match, keeping them involved in the wagering process longer. The recently added feature enabling consumers to “cash out” or cancel a bet mid-game / race was identified by many participants as a factor that encouraged them to continue gambling as it increased their perception of control over the gambling outcome.

“It does make you feel a lot safer, knowing you can pull out when things are going south.” – Male, 18-29, metro general public

In addition, some consumer participants noted the difference in **the rate** of gambling transactions between EGM gambling and wagering gambling. These participants reported that EGM gambling provided an instant result compared to wagering gambling in which the gambling transaction was only complete once the race / match / event had finished. As they had less time between bets for self-reflection, participants reported that they were more likely to “chase losses” when gambling on EGMs, and get “caught in the moment”.

However (as previously mentioned), some participants reported that the urgency to place a bet when wagering due to event start times was a motivator to bet “rashly” / in a less informed manner.

Leakage from terrestrial to online gambling

Participants reported that the ability to wager online was a key motivator to gamble / continue to gamble, as it was:

- ◆ **More convenient** – as it did not require their physical presence at a terrestrial venue, and therefore was less disruptive to their work or lifestyle commitments. This also meant it could be done at any time (day or night); and
- ◆ **Less visible** – participants, including recovered problem gamblers and low to moderate risk gamblers, noted that it was easier to “hide” gambling behaviour from their family / friends when gambling online.

This is demonstrative of leakage for some terrestrial wagerers to online wagering. Leakage of terrestrial to online of other types of gambling cannot be commented on, due to the limited extent of other online forms of gambling amongst research participants.

Differences between wagering gambling modes: Online wagering vs terrestrial wagering

While only one participant had engaged in online EGM gambling and the remainder terrestrial EGM gambling, many participants had engaged in online and/or terrestrial wagering.

Overall, participants felt that there were key differences between online wagering and terrestrial wagering. These included not only physical differences (e.g. in person attendance at a venue, payment / pay-out methods, innovations in gambling products), but also interactions of these physical differences with psychographic and attitudinal factors (e.g. perceptions of stigma, perceptions of risk, self-control). Differences and interactions are discussed below.

- ◆ **Payment and pay-out methods:** Linking a gambling account to a credit card or bank account was felt to require more self-control and discretion on the part of the consumer at times of potential vulnerability and emotional charge (i.e. resulting from winning or losing).

Unlike terrestrial wagering where winnings are

physically given to the consumer, online winnings remain in the consumer's account. This extra step required to withdraw money or transfer money to one's personal account made it more likely for consumers to set withdrawal thresholds or timeframes – keeping the money out of their hands longer than what a terrestrial environment would.

Further to this, certain online gambling providers are known for having a difficult and lengthy process to withdraw funds, giving more impetus to the consumer to leave funds in the gambling account and use later to gamble with, where they would ordinarily cash out.

- ◆ **Innovations in gambling products:** The new multi-builder feature was reported to enable betting at a much faster rate online than the terrestrial comparison of placing multiple bets in person.
- ◆ **Stigma:** There was a division in agreement that online wagering is a social activity. For younger ad-hoc wagerers, online gambling tended to be just as social as terrestrial gambling at a venue, and was often done at a public venue or private social engagement. In contrast, frequent gamblers, including semi-professional wagerers preferred to engage in online wagering in the absence of company. These consumers were more likely to view wagering as a hobby, or liken it to a business-like transaction.
- ◆ **Moderation strategies:** Another difference noted by some online consumers (previously terrestrial consumers), was the ability to implement more moderation strategies in the terrestrial environment, as opposed to online. For example, some reported leaving their credit cards at home when attending an event in person, preventing them from overspending. This is discussed in detail above in Section III.

Recovered problem gamblers and low to moderate risk gamblers pointed out that online accounts made it easier to hide their gambling activity from their family / spouse, compared to terrestrial gambling where their absence would be noticed.

D. Payment methods

Overall, participants reported that a key difference between gambling types was the payment and pay-out methods. Participants noted that, unlike terrestrial EGMS which required the use of cash, online wagering allowed credit cards to be linked to accounts. This reportedly enables participants to dissociate from spending the money; a key motivator to continue gambling.

Participants reported setting informal time or amount limits at which they would withdraw online winnings (e.g. winnings over \$100, or weekly / fortnightly / monthly withdrawals). However, this threshold was reportedly higher than was reported for terrestrial gambling, whereby participants typically reported only reinvesting amounts under \$20-\$50.

E. Requirements for participation

Participants noted a number of key differences in the requirements for participation in gambling activities between online and terrestrial gambling.

Participants reported that they **were required to provide identification** at terrestrial venues to prove they were over eighteen years of age. In contrast, some participants reported not having been required to produce identification in order to open an online gambling account, place a bet, and / or withdraw funds. This was a concern for participants, who felt that it would be easy for underage people to create online gambling accounts.

Another key difference between online and terrestrial gambling identified by participants was the **requirement to have an account / membership** when gambling with online providers. Many consumer participants reported that these accounts were difficult to close, with some providers having additional requirements in order to withdraw funds and close the account. In contrast with a terrestrial venue where participants could “walk away” at any time with no lasting obligations, the difficulty in closing online accounts may encourage participants to maintain the account and continue gambling, thus limiting their ability to moderate their gambling behaviour.

This was often compounded by the extent of communications (i.e. emails and text messages) received from online providers, often providing information on promotions and inducements that further encouraged consumers to gamble.

F. Transparency of risk

Participants felt that the level of risk involved in wagering gambling was available and readily accessible to the wagering consumer and could be factored into their decision-making (e.g. the odds were publicly available and set before the start of the event).

In contrast, most consumers felt there was less transparency in relation to when or how EGMs paid out,

"I know it's silly but I thought the machine would pay out, I thought the jackpot was coming up." – Female, 40-49, EGM consumer, regional SA

despite many knowing that the average pay-out of EGMs was set at 87.5% in South Australia. While a few participants reported having read the statistics on the machines when in the venue, it was felt that the maths involved was overly complex and could not be understood by most consumers. This lack of transparency may be a key motivator for some consumer participants in continuing to gamble, as they felt the jackpot could happen "at any time".

G. Perceived level of personal control

"You're playing against a computer." – Female, 30-39, EGM consumer, metro Adelaide

Most participants felt that wagering gambling allowed gamblers more control than EGM gambling. Most participants (including EGM consumers, and recovered problem gamblers) felt that winning on EGMs was based on "pure chance". As such, many participants considered EGM gambling to be "irrational".

In contrast, many participants felt that wagering gambling involved a level of skill. Participants thought that researching events and / or having a degree of "expert knowledge" would increase a gambler's personal control over the outcome of the gambling. Research findings suggest that this may be a key driver for wagering participants who enjoyed the "challenge" of "beating the system" with skill / knowledge. In addition, as previously discussed in this chapter, the recently added feature enabling consumers to "cash out" or cancel a bet mid-game / race increased participants' perception of control over the gambling outcome.

H. Stigma

Overall, most general public participants considered wagering gambling to be "social" in nature, based on their experiences of friends watching sports together and betting, while sharing the experience with others (i.e. via conversations).

In contrast, EGM gambling was seen as less social, typically engaged in by individuals in isolation, and less likely to be discussed in conversation. As such, most participants were more negative about EGM gambling than wagering

gambling, and considered it to be less socially acceptable. The research thus identified a stigma associated with playing EGMs that was not present in relation to wagering gambling.

V. Awareness and perceptions of gambling regulations in South Australia

A. About this chapter

This chapter discusses findings in relation to gambling regulations in South Australia (other than industry advertising regulations, which are discussed in the following chapter). It draws on research with both community participants and gamblers to discuss perceptions of regulations, as well as their impact on gambling.

B. Overall findings

The research identified limited awareness of the Independent Gambling Authority by name. However, most participants assumed that gambling was regulated by the South Australian government.

When asked about regulations, most participants instinctively thought of those in relation to gaming venues and EGMs. Participants (both community members and gamblers) were much less likely to consider regulations relating to wagering forms of gambling.

Across the board, there were low levels of awareness of South Australian gambling regulations. The most commonly recalled restriction was in relation to age limits (“18+”). In addition, some community participants and many gambler participants were aware of:

- ◆ A ban of children in gaming rooms;
- ◆ Location restrictions in relation to ATMs outside of gaming rooms; and
- ◆ Restrictions on withdrawal amounts at ATMs adjacent to gaming rooms.

A few participants were also aware of / had heard of:

- ◆ Restricted opening hours of gaming rooms;
- ◆ Maximum bet limits on EGMs;
- ◆ Regulations relating to the number of EGMs allowed in a venue;

- ◆ Restrictions for gambling on credit; and
- ◆ Card-based pre-commitment initiatives.

"Sometimes I think that the government goes too far... sometimes regulations may be going too far" – Male, 30-49, metro general public

While most participants were supportive of regulations relating to gambling, a few (mostly middle-aged) participants expressed concern over the amount of government regulation of gambling in South Australia. These participants believed that the onus of responsibility to gamble within one's means should be placed on the individual, not the government or the gambling providers.

Following exposure to current regulations in the research, it was clear to many participants that the current regulations were written more in relation to EGM gambling than wagering. As such, they were felt to have less applicability to wagering environments.

In addition, many participants expressed concern that the current restrictions were open to industry and consumer "abuse". This scepticism led to questioning of enforcement, an area which many felt was currently "deficient". As such, participants felt that tightening regulations to address areas open to potential industry and consumer manipulation was important.

C. In-venue regulations – gambler exposure and impact

In relation to **in-venue advertising** promoting responsible gambling, gambler participants could recall seeing:

- ◆ Posters displayed in gaming rooms, on toilet walls / doors and on ATMs; and
- ◆ Cards available on countertops.

Upon prompting, most felt this advertising was noticeable and large enough to read. In addition, most were aware that they provided information about the helpline should they require assistance with their gambling.

The following messages could also be recalled from in-venue advertising:

- ◆ 18+ regulations;
- ◆ "Are you gambling within your means?";

- ◆ “Gambling is an addiction – help is available”;
- ◆ “If you have a problem ring this number”;
- ◆ “If you’re worried about your gambling”; and
- ◆ Facts and statistics about EGMs and payouts rates.

However, most felt that the information provided in venues was aimed at problem gamblers. As most did not see themselves as having a problem, and due to the stigma around problem gambling, most dissociated with these materials regardless of need / relevance. This may limit the cut-through and call-to-action of the materials.

A few participants reported being **approached by gaming staff** in relation to gambling behaviour; however participants had not perceived these to be interventions (i.e. staff had asked them how they were going, and / or if they were winning). Such conversations were reported more by regional consumers, likely due to the fact that they were more closely acquainted with staff. In addition, one gambler participant had been asked by a staff member if they were going to go home following a win. This had encouraged the participant to do so, and was perceived as a positive intervention.

In addition, a few EGM consumers reported that the limit for EGMs was currently too high, and should be set at a maximum bet limit of \$1. This type of intervention was felt to be a reasonable strategy to assist EGM consumers to not gamble “too much”.

D. In venue regulations – community perspectives

Overall, there were low levels of unprompted awareness of venue restrictions among community participants, with the exception of restricting gambling for those under the age of 18. As previously mentioned, a few participants also mentioned disallowing children in gaming rooms, and ATM withdrawal limits.

“The signage is effectively useless. It’s not going to deter anyone who would walk in to go “Oh, maybe I should gamble responsibly”.” –

The presentation of **information and signage at venues** was met with cynicism amongst many community participants, who did not believe that it would have a positive impact on consumers. While participants noted that the display of

Male, 50+, metro general public

"Waste of time. People have already decided to play the pokies when they go to the venue - these would be ignored." – Male, 50+, regional SA general public

information would be easy to enforce and monitor, most believed that in today's gaming and gambling environments, such information would have limited impact, and existed only by legacy and/ or for legal risk management reasons.

Many participants were also dubious about the impact and efficacy of **staff interventions** intended to assist problem gamblers. In particular, participants questioned the ability to enforce this regulation and monitor venues' compliance. Further, these regulations were perceived to be largely designed to assist problem gamblers, and less so designed to encourage at risk (and other) gamblers to gamble responsibly.

Many general public participants felt that there was a need to tighten the following venue restrictions by:

- ◆ Disallowing alcohol service in gaming rooms – including disallowing food and beverage service while at EGMs;
- ◆ Tightening the regulation of access to cash withdrawals for gambling purposes; and
- ◆ Restricting / reducing opening hours of gambling venues.

The research identified some older participants, most of whom had direct and indirect experiences of problem gambling, who were opposed to gambling being legal in South Australia. While only a minority of participants held this view, there was substantial support for limiting and/ or banning EGM use in South Australia.

E. Online account regulations – gambler exposure and impact

Amongst gambler research participants, the '18 years and over' age restriction and requirement for identification was the key regulation noted in relation to online accounts. Nevertheless (and as previously mentioned), some participants reported having opened online accounts with Australian-based providers, and not being asked to provide identification before placing a bet.

When prompted, there was limited recall of **responsible**

gambling materials or warning messages when using an online account. Only one participant recalled having received a letter in the mail about the availability of their provider's **pre-commitment scheme** (which the consumer opted not to take up).

In addition, some had received **account activity statements**. While most had not opened these, it had provided a useful perspective for a few who had been "surprised" by the extent of turnover in their account.

The research also identified some cases of perceived **improper industry conduct** mentioned by participants in relation to online account use. Namely:

- ◆ Online gambling providers **honouring credit promotions**, which are disallowed for South Australian consumers when opening accounts / placing bets;
- ◆ Providers making it **a difficult and / or lengthy process to withdraw funds** from online accounts – findings suggest that this may limit the extent to which gambler participants would withdraw their funds and / or would encourage them to spend their winnings on more bets; and
- ◆ Providers **requiring consumers to gamble a certain amount of money before allowing them to withdraw their funds** – this was often mentioned in relation to specific requirements when consumers were offered "bonuses".

F. Online account regulations – community perspectives

"People who are going off to gamble, aren't going to read anything... They go in there wanting to win. They're not going to be worried about a Code of Practice!" – Female, 50+, metro general public

In relation to the **provision of required information** (e.g. responsible gambling messages and warning messages) by industry providers, general community research participants felt that consumers would be easily able to click through to the sections they intended on using without reading through and / or engaging with these details.

Furthermore, as the requirements largely involved making information *passively* available, they felt that providers would do their best to hide and shrink this information.

To address this issue, participants (mostly younger and middle-aged), suggested mandating providers to actively push information to all new account holders. For example, new customers and existing account-holders could be forced to look at or watch (e.g. in video form) any government mandated information (e.g. warning messages, responsible gambling advertisements), without the ability to click through or bypass this feature.

Participants also suggested increasing the number and frequency of mandatory non-promotional pop-ups (e.g. displaying warning messages, government advertising, terms and conditions), requiring consumers to look at these and actively engage – i.e. responding via checked boxes.

Many felt that this approach would have the potential to interrupt automatic “clicking through”, and make consumers consciously consider the information. Participants felt that this could work best if there was a high number of pop-up variations (to prevent desensitisation and maintain interest), and if they popped up on a variable-interval schedule.

“Online gambling is a bigger problem, because, many of the gambling sites are offshore where local law enforcement has no jurisprudence.” – Male, 50+, regional SA general public

However, among older and middle-aged participants there was scepticism in relation to how these issues would be managed and regulated for international online gambling providers. There was a widely held perception that currently, the majority of online gambling providers were international providers, and therefore not bound to adhere to South Australian regulations.

There was unanimous support amongst participants for **ensuring rigorous identification checking** on the part of gambling providers before an online gambling account was opened and money wagered. Participants recognised that this was harder to implement in an online environment as there was more scope for consumers to lie about their age (e.g. by providing false identification). Nevertheless, this was a regulation that most community participants felt strongly about, as it was likely to limit underage gambling and the potential harmful effects of this.

The concept of online **pre-commitment** for online accounts was raised spontaneously, primarily by participants of a higher socio-economic status (SES), who were supportive of this initiative. However, there was scepticism amongst many as to the effectiveness of pre-commitment for

"Pre-commitment will only work if a gambler admits it's a problem." – Male, 50+, regional SA general public

"You could always set it as a caution – it doesn't mean you have a problem." – Female, 18-29, metro general public

"It forces you to set the limit before you gamble. It should be phrased as "This is the amount of money I can afford to lose"." – Male, 18-29, metro general public

addressing problem gambling, particularly if voluntary. Nevertheless, many believed it would have traction and could work for newer gamblers, or self-aware gamblers who recognised they may have problematic tendencies. This was also supported by the identified desire to remove emotion / make rational decisions when engaging in wagering gambling (as discussed in Chapter III).

Middle-aged and older, higher SES participants were most likely to recommend that pre-commitment be mandatory instead of voluntary (or at least be set up for everyone, with the ability to opt out). Others suggested more actively promoting pre-commitment and making the option more explicit at the account set up stage, and revisiting it with consumers on a more regular basis than the current two year timeframe to increase its utilisation and effectiveness.

Regulations around **activity statements** received mixed reactions. It was felt these may be of interest to a small minority of (generally older) consumers.

Instead of sending activity statements in writing (which were only required to show a list of transactions), most participants were in support of ensuring online accounts were required to prominently display a consumers net win/loss position. It was felt that this would provide a clearer indication for consumers as to their current financial position. In addition, some participants felt it would be useful to graphically present a consumer's net position over time, so as to better highlight periods of higher spend via year on year / month on month comparisons.

VI. Community awareness and perceptions of gambling advertising and education in South Australia

A. About this chapter

This chapter presents research findings relating to participants' awareness and perceptions of industry advertising and its regulation as well as public education about responsible gambling.

B. Recall and perceptions of gambling industry advertising

Most community and gambler participants were able to recall wagering advertising. In general, most participants perceived there to be currently "too much" of this advertising. In contrast, there was limited recall of advertising for EGMs.

The most common sources of advertising recalled included television (free-to-air and pay television), online advertising (including advertising via social media – e.g. Facebook and Instagram), and radio.

All wagering advertisements recalled by participants were in relation to promoting **online account-based gambling**. Overall, younger participants had the highest recall of specific advertising content. Specific content recalled by participants included:

- ◆ Celebrity endorsements;
- ◆ Inducements and promotions – specific examples recalled by participants included:
 - "Receive half money back if your horse places";
 - "Get your money back if you pick first and second horses";
 - "Bet online on your phone";
 - "Place more than one bet at one time"; and
 - The mid-game "cash out" feature;
- ◆ Instructions on how to bet;

- ◆ Demonstrations of the ease of signing up to accounts and placing bets; and
- ◆ Depictions of betting in social situations.

“[They’re] aimed at the younger set who love their smartphones.” – Male, 50-59, regional SA general public

As previously mentioned, participants felt that ads were aimed largely at younger males as the content typically depicted groups of young men betting using their phones, combined with a “blokey” voiceover.

Very few participants recalled having seen advertisements for EGMs, with the exception of some online slot machine games advertised via apps, social media or internet (e.g. pop-ups). There was also limited recall of advertising for venue promotions, but the few recalled were predominantly in relation to meal deals, loyalty programs (e.g. “Jackpot club”) and double points / happy hours.

C. Impacts of industry advertising

Overall, the research findings suggest that online wagering advertising may be more likely to have an immediate behavioural impact on consumers (compared to EGM advertising). The research suggested that this was due to the ease of the online sign up process and account promotions, which facilitated and encouraged immediate gambling activity.

Specifically, online wagering advertising may:

- ◆ Encourage existing online wagerers to top up their account, place more frequent bets, and / or bet with more money;
- ◆ Attract existing terrestrial wagerers to open an online account and place bets – some terrestrial consumers reported they had been attracted to opening an online account by the ability to cash out early (e.g. mid game), while others appreciated the different types of bets available (e.g. multi-builder); and
- ◆ Encourage non-gamblers to open an online wagering account and place a bet.
- The mid-game cash-out feature was discussed extensively by younger general public participants, who felt that it was appealing for

“It’s implying you can be clever, and you can pull out if you need to.” – Male, 18-29, metro general public

more risk averse and / or first-time gamblers as it reduced the perceived risk by providing a safety net. Many of these participants perceived that this could increase and change the base of consumers who engage in betting.

In contrast, the research indicated that EGM advertising (although not often recalled) may have a limited immediate behavioural impact.

D. Perceptions of current advertising restrictions

Across the board there was in-principle support for the existing restrictions on advertising content (e.g. no depictions of children gambling, no depictions of gambling and alcohol consumption, not depicting winning as a definite outcome, not offering inducements, etc.).

“They [providers] design their advertisements to legally skirt the boundaries.” – Male, 18-29, metro general public

“I think there’s a loophole. I’ve seen most of these in gambling commercials.” – Male, 18-29, metro general public

“If you think of the Sportsbet ads, they’re drinking beer while they’re on their phone placing a bet.” – Female, 30-49, metro general public

“That doesn’t apply to weekends,

However, many participants felt that advertising restrictions were not always adhered to by industry and / or were subject to exploitation. These participants recalled recent advertisements that contravened and / or were designed to legally circumvent the restrictions by:

- ◆ Depicting winning using loud noises and cheering;
- ◆ Containing alcohol, while avoiding showing *consumption* of alcohol; and
- ◆ Showing a group of men betting on smartphones while consuming alcohol.

Similarly, syndicated advertisements were felt to evade the restriction of not offering inducements in South Australia. Many participants could recall recent industry advertising that offered an inducement in the absence of the finer terms and conditions of availability in South Australia.

The research also indicated that participants held strong views that regulation in relation to the hours gambling advertising was permitted to be broadcast / blackout periods on television and radio needed to be strengthened. Many complained about the “intrusive” and “invasive” nature of gambling advertising. Across all groups, the exposure of minors to gambling advertising was a key concern for participants – this was consistently

and most sport is on weekends, so therefore, it doesn't really stop much." – Female, 30-49, metro general public

"I think that gambling ads should not be on TV or radio where there is a high chance of kids or teenagers exposed." – Female, 30-39, regional SA general public

"How does this affect digital advertising? All the kids are watching YouTube." – Female, 30-49, metro general public

"Why don't they just switch it all to dedicated sports channels?" – Female, 50+, metro general public

"Online you see these all the time, and obviously the regulations don't catch them effectively because they're online." – Male, 18-29, metro general public

raised, unprompted, as an issue throughout the research. Participants were particularly concerned about the lack of restrictions on industry advertising during weekends, as there was a high chance of children's exposure at this time.

Participants felt that blackout periods for industry advertising should be extended by at least 30 minutes either side of the current periods as a minimum (if not all daylight hours or weekdays), to reduce children's exposure. Many middle-aged and older participants with children were in support of banning gambling advertising via mass media channels (and visible sponsorship) altogether.

Younger and middle-aged participants also noted that there was heavy industry advertising via online / digital channels (including apps), and felt that greater regulation of advertising on these channels was required. Those with children held particularly strong concerns about this form of advertising and felt that it should be banned (or at the very least blackout periods introduced for periods when children were most likely to be online). However, it was noted that regulation of advertising content online was more difficult.

In contrast, participants were less concerned about the exemption of advertising blackouts on dedicated sports channels.

E. Perceptions of mandatory warning messages

Almost all participants had seen or heard the condensed mandatory warning message "Gamble Responsibly" at the end of industry advertising. In contrast, awareness of the expanded warning message was much lower.

Overall, participants felt that the mandatory warning message had a limited impact on gambling behaviour, reporting that the message:

- ◆ Generally went unnoticed, with a few describing it as "dated";
- ◆ Had limited impact on stopping / changing behaviour when seen/ heard;

"As a statement "Gamble responsibly", it's actually telling you to gamble. It's not saying 'Don't gamble unless you're being responsible'." – Male, 50+, metro general public

"They are just covering their own arse." – Female, 18-29, metro general public

- ◆ Was not shown for a long enough period of time, compared to the length of the gambling provider's ad; and
- ◆ For some, the target audience and meaning of the message was unclear – these participants were unsure what was meant by "Responsible Gambling" and whether it was aimed at non-frequent, frequent or problem gamblers.
- ◆ Many participants were also cynical about the intent of responsible gambling warnings that came from the industry, believing they were only included for legal risk management reasons.

F. Public education

"If there's no education for anybody, restrictions mean nothing" – Female, 30-49, metro general public

Overall, participants felt that public education about responsible gambling was necessary to complement regulatory efforts. There was widespread support for campaigns from the Independent Gambling Authority to encourage responsible gambling behaviour and support help seeking amongst problem gamblers. Some participants felt that there should be a set ratio for the number of government responsible gambling ads broadcast versus industry ads during times of higher industry advertising.

Most participants felt that there was a need to increase the amount of public education about responsible gambling to:

- ◆ Educate the public and set community norms in relation to appropriate / responsible gambling behaviour – this was felt to be particularly important as a counterbalance to the extensive advertising from the gambling industry which was felt to normalise gambling;
- ◆ Raise awareness of South Australian gambling regulations, to set community expectations for the industry;
- ◆ Address myths and misconceptions about the nature of problem gambling and who was at risk (i.e. raise awareness that anybody could develop a gambling problem and address stigma associated

with problem gambling); and

- ◆ Raise awareness of help seeking and support services available – the research indicated that there was limited awareness of where to go for support and further information about gambling amongst most participants.

“...the basic problem is that the government is actually addicted to gambling...Why are they going to shoot themselves in the foot and go out and do what they did for smoking to stop it, when it’s actually going to adversely impact on their bottom line?” – Male, 50+, metro general public

“Early education is mandatory. They get the seed sown at a very early age. You show them how it’s destroyed lives, and then it grows.” – Female, 50+, metro general public

However, some older and middle-aged participants were sceptical about the government’s willingness to engage in advertising to counteract the industry, given the revenue gambling taxes generated.

Many participants also identified responsible / preventative gambling education efforts in upper primary and secondary school as important and necessary, particularly given children’s increasing exposure to gambling advertising. A few participants also felt that public education efforts should be targeted at parents to encourage positive role-modelling of appropriate gambling behaviour and parental responsibility.

VII. Implications for gambling regulation

A. About this chapter

This chapter discusses the implications of the research findings for regulating gambling in South Australia.

B. Overall findings

Through the interviews with EGM and wagering gambler participants, the research identified a number of possible regulatory changes to address identified differences between EGM and wagering gambling. These related to:

- ◆ Advertising regulations; and
- ◆ Online and account based regulations.

General public participants were then presented with a range of potential additions to gambling regulations, so as to ascertain public reaction to these measures / changes.

The research indicated that there was widespread support and a perceived need for greater regulation in relation to online account-based gambling as well as restrictions on the timing of industry advertising.

C. Advertising regulations

The majority of general public and gambler research participants were in support of **tightening blackout periods in relation to television and radio advertising** (acknowledging advertising would be harder to regulate online).

Most also called for effective (and engaging) government responsible gambling advertising campaigns to offset and counteract industry advertising, especially during high peaks of gambling advertising (e.g. racing season, football season).

Further, the current warning message was received poorly by all; most participants reported being desensitised to it, and felt that it was tokenistic and not aimed at a clear

target audience.

There was strong agreement that, while responsible gambling advertising may not be overly effective in addressing and reducing problem gambling behaviours, it would likely assist at-risk gamblers to self-identify, and prompt some to moderate their behaviour or seek support (including from informal means). Responsible gambling advertising was also thought to have a potential additional effect in preventing non-gamblers from becoming gamblers.

The research indicated that, so as to be effective, the advertising would need to be implemented in an ongoing, concerted and integrated manner.

D. Online and account-based regulations

Online information and communications for online gambling consumers (e.g. responsible gambling materials and warning messages) were also met with scepticism. Most participants did not believe these would be effective in encouraging responsible gambling. In particular, consumers were able to ignore responsible gambling materials and messages by “clicking through”. There was thus widespread support for setting timers to force consumers to watch responsible gambling messages (i.e. via videos instead of reading resources), and terms and conditions of online providers, before opening an account and engaging in wagering online.

It was felt that this potential reform to the current regulations would be effective in ensuring consumers were made explicitly aware of their rights as a gambling consumer and the conditions they sign up to engage in online betting in Australia.

However, while the result may be that consumers are more informed, it was felt that this reform would be unlikely to have a significant effect on gambling behaviour. There was widespread agreement from all participants (general public and gambling consumers) that interventions and physical barriers would have the highest likelihood of modifying gambling behaviour.

Potential changes to online account-based regulations that received the most support follow.

1. Banning of gambling with credit – both credit facilities provided by gambling providers and the use of credit cards to deposit funds into accounts

This corresponds to a successful strategy implemented by many terrestrial consumers who reported that leaving their credit cards at home assisted them to make better decisions when at the venue.

“It’s [the use of credit is] encouraging people to gamble.” – Female, 50+, metro general public

“If you can’t pay your bills, then you shouldn’t be putting yourself into more debt.” – Male, 50+, metro general public

“Definitely ban credit. If you can’t pay for it outright, then you can’t afford to gamble!” – Female, 30-49, regional SA general public

The research indicated that many consumers relied on credit, and linking a credit card to a gambling account not only allowed consumers to gamble with borrowed money, but also removed a large element of conscious decision-making associated with placing a bet. By providing funds immediately, it removed the need to plan for gambling, catering to impulsive decision-making.

Banning the use of credit for gambling was thought to be an effective measure to curtail problematic gambling tendencies for all consumers, including problem gamblers. It was a reform that received strong support from the majority of participants.

The implied requirement to deposit funds in advance (e.g. via BPAY or EFT) would prompt the consumer to consciously consider and plan gambling activities ahead of time, guarding them against irrational spending behaviours.

2. Requiring explicit display of the consumer’s net financial position (e.g. annual or total) on all key pages (including on apps and gambling websites)

Net position is something that at-risk consumers admitted not keeping track of, and willingly ignoring. Account holders reported that their recent incoming / winning amounts were made available and obvious to them, but without the context of net winnings / losses over an extended period.

“If you got information over a period of time, it might be able to help you.” – Male, 50+, metro general public

There was widespread support for making net position obvious to consumers, as this would be likely to encourage reflection on spending amount, and have the potential to curb problematic tendencies.

Some participants also felt that providing graphical representation of net position over time could be beneficial to highlight periods of higher spending, and year on year / month on month comparisons.

3. Quick online account closure

As previously mentioned, many consumers reported difficulty in closing their online accounts, with providers sometimes requesting balances be spent in certain ways in order to cash out. Ensuring providers allowed consumers to close their account quickly without unreasonable requirements would assist consumers who want to take a break from online gambling. There was unanimous support for this reform – from gamblers and non-gamblers.

"You don't want to have to click three places, wait thirty days, and then reply to an email to close it down." – Male, 50+, metro general public

4. Sweeping of accounts to remove positive balances from accounts at the end of the day

This proposed reform (which was suggested in recognition of the fact that while winnings were physically collected at the end of each session for terrestrial gambling, they tended to remain in the account for online gambling) was met with mixed support – many members of the general public believed this could be a positive reform for at-risk and problem gamblers with online accounts.

The extra step required of gamblers to redeposit funds would conceivably provide the consumer with the chance to more carefully consider their decision to gamble.

5. Voluntary time-outs and account lock-outs

Enabling voluntary account lock-outs was raised (unprompted) by some participants as a reform that would enable self-recognised problematic gamblers to put limits on themselves in a stricter manner than that allowed through pre-commitment.

This reform would be reflective of the terrestrial venue barring / self-exclusion regulation.

6. Identification of consumers gambling above their average and installing additional steps to proceed

This online regulation would be equivalent to the in-venue regulation requiring gaming staff to monitor gambling

expenditure and intervene in an attempt to moderate the behaviour.

While this equivalent regulation for terrestrial venues was met with scepticism in terms of implementation, management, and enforcement, most agreed that it would be more effective in an online environment as it could be enabled by mathematical tracking of a consumers' average, which could trigger a series of pop up barriers, or warnings to the consumer, to encourage reflection. If consumers were forced to consider warning messages and reflect on their higher than average spend (and losses) over a recent period of time, this may be effective in assisting certain consumers to consciously consider moderating their gambling.

The majority of participants agreed that notification should be triggered based on a consumer gambling larger than their personal average (higher spend and/or frequency). This was considered mainly in relation to higher than average losses – participants mostly did not support this change to regulation in relation to higher than average wins.

There were suggestions from participants of displaying video content which consumers would be unable to skip; essentially obligating consumers to watch. Video content proposed by the general public included responsible gambling messages, instructions and information about what responsible gambling looks like and anti-problem gambling imagery to warn against going too far.

7. Tagging of problem gamblers

There was some (unprompted) mention in the research of identifying problem gamblers, and applying additional restrictions to these identified consumers. Many felt that online accounts would lend themselves to tagging these individuals, and thus triggering additional requirements. These could include:

- ◆ Requiring a family member / next of kin guarantor to agree when opening an online account;
- ◆ More rigorous credit checks; and / or
- ◆ Approval from an independent third party.

8. Rigorous identification checking

An important issue raised by participants of various ages was that of preventing underage people from creating online accounts. As previously mentioned, consumers reported having opened online accounts with certain Australian-based providers without being asked to provide identification prior to placing a bet.

There was unanimous support for ensuring rigorous identification checking on the part of gambling providers before an online gambling account was opened and money wagered.

9. Consideration of restricting certain online products and features

An area of difference between terrestrial EGM and online wagering gambling was that of restrictions in terrestrial EGM venues for consumers to use just one EGM at a time. In the online account-based wagering context, the **multi-builder** feature appears to encourage simultaneous betting, contrary to the intent of the EGM regulation.

In addition, the “cash out” feature offered by some online providers may reduce the perceived risk of a bet (hence encouraging those who were less likely to gamble with their money to do so).

E. Perceived difficulties in implementing online reforms

A number of issues were raised by participants in relation to the implementation of reforms to online gambling accounts.

There was a widely held perception that the majority of online gambling providers were internationally-based, and therefore not bound to adhere to regulations in Australia. Thus, participants were sceptical as to how any online account-based regulations would be managed and enforced for international online gambling providers in accordance with South Australian legislation.

Gambling consumers and the general public believed that this scenario may lead to increased costs and / or reduced

benefits associated with gambling online using Australian providers. These pressures may in turn drive Australian consumers to use international gambling sites, at a heightened risk.

VIII. Conclusions

The research findings, coupled with the increasing prevalence of online wagering in South Australia, support the need for a review of the regulatory framework. The research has identified a number of possible regulatory and broader public policy responses to address the differences between EGM and wagering gambling, as well as the perceptions and expectations of the general public in South Australia.

Potential changes relating to industry advertising include:

- ◆ Tightening blackout periods in relation to television and radio advertising – most research participants were in support of this, mainly due to the perceived unnecessary exposure of children to gambling advertising at times and on channels where they would typically be tuned in; and
- ◆ Producing government responsible gambling advertising campaigns to offset and counteract industry advertising – there was strong agreement that this would likely assist at-risk gamblers to self-identify, and prompt some to moderate their behaviour or seek support.

Potential changes to online account-based regulations include:

- ◆ Banning of gambling with credit;
- ◆ Requiring explicit display of the consumer's net financial position;
- ◆ Quick online account closure;
- ◆ Sweeping of accounts to remove positive balances from accounts at the end of the day;
- ◆ Voluntary time-outs and account lock-outs;
- ◆ Identification of consumers gambling above their average and installing additional steps to proceed;
- ◆ Tagging of problem gamblers;
- ◆ Rigorous identification checking; and
- ◆ Restricting certain online products and features (e.g. the "multi-builder" and "cash out" features).