

2006

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Publication details

Post-print of: Breen, H, Hing, N & Buultjens, J 2006, 'Responsible gambling practices in outback Queensland: distinctive challenges in a remote location', *Journal of Economic and Social Policy*, vol. 11, no. 1, pp. 45-71.

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POST PRINT – POST PEER REVIEWED VERSION

Responsible Gambling Practices in Outback Queensland: Distinctive Challenges in a Remote Location

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Abstract

While gambling can provide certain benefits, one of its negative social impacts, problem gambling, has lately gained unprecedented attention. Some governments and industries have responded with responsible gambling codes of practice, typically a set of operator practices aiming to reduce harm to gamblers. This paper draws on a study into the implementation of one such code, the voluntary Queensland Responsible Gambling Code of Practice, by hotels, clubs and casinos in that state and how this varied amongst urban, regional and remote areas. This paper discusses that research in Longreach, a remote community. It found that the managers and staff of gambling venues had little awareness of the Code, had implemented few of its provisions, and were generally sceptical about its potential effectiveness. Distinctive features of Longreach's remote location are identified as key reasons for this low implementation rate.

Introduction

Problem gambling has emerged as a significant social issue in Australia over the last decade, in tandem with the exponential expansion of commercial gambling (Hing 2002). During the last five years, many Australian governments and gambling providers have introduced responsible gambling codes of practice in response to considerable public pressure to minimise gambling problems and their impacts, to encourage more responsible gambling, and to improve consumer protection in gambling. In June 2002, the Queensland Responsible Gambling Advisory Committee introduced the voluntary *Queensland*

Responsible Gambling Code of Practice (Queensland Treasury 2002b) for all gambling providers in that state. Six months after its launch, the authors undertook a study to examine the extent to which the Code had been implemented in hotels, licensed clubs and casinos in Queensland and the attitudes of managers and staff towards various aspects of the Code. This paper reports on that research in one case study region, Longreach in central western Queensland, and reflects on how the remote location of that community has influenced the implementation of the Code and the related attitudes of gambling venue management and staff. With the vast majority of Queensland classified as 'remote' or 'very remote', it appeared instructive to investigate the Code's implementation in such a setting.

As background, this paper begins with an explanation of problem gambling and responsible gambling, and efforts to address these in Queensland. Key features of remote communities are identified, followed by a brief overview of historical forces that have influenced the development of the remote community of Longreach. The methodology is then explained and results presented. The paper concludes by discussing numerous features of remote communities that have influenced the management of responsible gambling in hotels and clubs in Longreach.

Problem Gambling

In Australia, gambling has become an intrinsic part of the national culture since European settlement in the late 18th century (Caldwell 1972). However, it was only during the last few decades of the 20th century that gambling emerged as a major industry, spurred by liberalised government policies and expansionist industry practices (Productivity Commission 1999). Many forms of gambling have been legalised and/or expanded, including on- and off-track wagering, lotteries, gaming machines, casino games, keno, sports betting and more. This unprecedented growth of gambling has yielded certain benefits for a range of stakeholders, including recreational opportunities for individuals, taxation revenues for governments, profits for industry and investors, and economic revitalisation for some communities. However, it has also resulted in a range of negative impacts and costs. In Australia, the most prominent and controversial of these is, arguably, problem gambling.

Problem gambling has been defined as 'the situation when a person's gambling activity gives rise to harm to the individual player, and/or to his or her family, and may extend into the community' (Australian Institute for Gambling Research 1997, p.2). For an individual, the costs associated with problem gambling can include a range of personal, family, social, legal and financial problems. However, the impacts of problem gambling are also recognised as extending beyond the individual, such that problem gambling is now more often viewed as a public health issue (Korn & Shaffer 1999). This public health perspective recognises that additional costs accrue, such as those associated with problem

gambling treatment programs, impaired work performance, family breakdown, gambling-related crime and the opportunity costs of the time and money spent gambling. It is estimated that approximately 2.1 percent of adult Australians have either 'severe' or 'moderate' problems with gambling, and that each case of problem gambling typically impacts on another five people (Productivity Commission 1999).

Responsible Gambling

Despite being widely used, the terms 'responsible gambling' and 'responsible provision of gambling' are still poorly defined, although they generally refer to gambling operator practices that aim to reduce harm to gamblers (Dickerson 1998). The Productivity Commission (1999) identified these practices as including provision of information on the price and nature of gambling products and on the risks of problem gambling, controls on advertising and the availability of ATMs and credit, and self-exclusion options. The introduction of such practices in responsible gambling programs in Australia recognises that, as gambling is a legalised activity with known risks, a duty of care accrues to legislators and providers to minimise harm to the public (Michaleas 2000). With problem gambling now seen as a social and public health issue, a responsibility rests with gambling providers and regulators to introduce structural changes for improved harm minimisation in gambling.

Responsible gambling has also been interpreted to include informed consent, a key principle underpinning consumer protection. Dickerson (1998) suggests that by applying the principle of 'informed consent', responsible gambling needs to ensure that consumers understand all relevant processes involved in the form of gambling, are able to make a genuine choice, and are not making decisions to gamble under conditions of strong emotion or personal crisis.

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

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

occur(ring) in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership by individuals,

communities, the gambling industry and Government to achieve outcomes that are socially responsible and responsive to community concerns.

In addition to difficulties in defining key terms and principles, responsible gambling codes of practice also face the challenge of being embraced and effectively implemented, particularly where such codes are voluntary and self-governing, as in Queensland. In fact, existing Australian codes have been criticised for their lack of mechanisms for reporting, evaluation and compliance (Doherty 1999; Productivity Commission 1999; Hing Dickerson & Mackellar 2001). Given this deficiency, it appeared instructive to assess how widely a voluntary code, such as that in Queensland, has been accepted by gambling providers. To contextualise this assessment, some background on the development, implementation and review mechanisms of this Code is provided below.

Queensland's Approach to Responsible Gambling

Before June 2002, Queensland legislation relating to gambling operations in casinos, clubs and hotels required few responsible gambling practices beyond the usual minimum requirements relating to minors, staff gambling, credit betting and exclusion provisions. A \$5 maximum bet on gaming machines and a \$20 upper limit on note acceptors were imposed. The legislation also provided for imposed exclusion from playing gaming machines for one month where a licensee believed there were reasonable grounds that the peace and happiness of a person's family were endangered due to excessive playing. Additional to these harm minimisation measures, legislative amendments were made to better control the supply of machine gambling. For example, machine numbers were limited to 280 per registered club and 40 per hotel, and applications for new or additional machines required accompanying community impact statements and statements of responsible gambling initiatives. Requirements that gaming advertising be factual, not be indecent, offensive, false, misleading or deceptive, were also introduced.

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

1. Enhancing responsible gambling policies and programs through research;
2. Increasing community knowledge and awareness of the impacts of gambling;

3. Reducing risk factors for problem gambling through early intervention;
4. Developing a statewide system of problem gambling treatment and support services;
5. Ensuring gambling environments are safer and more supportive for consumers; and
6. Promoting partnerships to address statewide and local gambling issues and concerns.

To address the fifth priority area above, the Queensland Responsible Gambling Advisory Committee developed the Queensland Responsible Gambling Code of Practice (Queensland Treasury 2002b). This Committee is a tripartite alliance which aims to provide 'a community, industry and government forum to monitor the impact of problem gambling in Queensland' (Queensland Responsible Gambling Advisory Committee 2001). In developing the Queensland Responsible Gambling Code of Practice, the Committee undertook extensive community and industry consultation, with a draft released for public consultation between December 2000 and March 2001. Following further refinements, the Code was launched on 29 May 2002. It commits gambling providers to a range of practices in six broad areas, as shown in Table 1.

Table 1: The Queensland Responsible Gambling Code of Practice

1.	Provision of information
	Each gambling provider is to provide information to ensure that customers can make informed decisions about their gambling.
1.1	A responsible gambling mission statement is clearly displayed.
1.2	Information about the potential risks associated with gambling and where to get help for problem gambling is prominently displayed in all gambling areas and near ATM and EFTPOS facilities servicing gambling areas.
1.3	Information is displayed to alert customers that the following information is available on request: the gambling provider's Responsible Gambling Policy document including policies for addressing problem gambling issues relevant to the local community; nature of games, game rules and odds or returns to players; exclusion provisions; gambling-related complaints resolution mechanisms; key elements of the gambling provider's financial transaction practices.
1.4	Meaningful and accurate information on the odds of winning major prizes is prominently displayed in all gambling areas and in proximity to relevant games.
2.	Interaction with customers and community
2.1	Community liaison To support early intervention and prevention strategies, gambling providers are to establish effective mechanisms to link with local gambling-related support services, and local relevant community consultative networks.
2.2	Customer liaison role Gambling providers are to nominate a person to perform the customer liaison role and who is trained to: provide appropriate information to assist customers with gambling-related problems; support staff in providing assistance to those customers; and to provide assistance to staff with gambling-related problems.
2.3	Customer complaints Customer complaints resolution mechanisms for recognising and addressing complaints are established and promoted by gambling providers.
2.4	Training and skills development Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to staff who provide gambling products to customers. In addition, the relevant owners, boards and managers receive appropriate information to guide decision making in relation to responsible gambling.
3.	Exclusion provisions
3.1	Gambling providers to provide self-exclusion procedures and supporting documentation.
3.2	Gambling providers offer customers who seek self-exclusion contact information for appropriate counselling agencies.
3.2	Self-excluded gambling customers are to be given support in seeking consensual exclusions from other gambling providers, where practicable.

- 3.4 Gambling providers are not to send correspondence or promotional material to gambling customers who are excluded or known to have formally requested that this information not be sent.

4. Physical environments

- 4.1 Minors are prohibited from gambling.
- 4.2 Minors are excluded from areas where adults are gambling.
- 4.3 Service of alcohol on the gambler's premises is managed in such a way as to encourage customers to take breaks in play.
- 4.4 Customers who are intoxicated are not permitted to continue gambling.
- 4.5 Where gambling providers offer adjunct child care, the facilities must provide safe and suitable standards of care in accordance with relevant child care legislation.
- 4.6 Staff working in gambling areas are not to encourage gambling customers to give them gratuities.
- 4.7 Gambling providers implement practices to ensure that customers are made aware of the passage of time.
- 4.8 Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play.

5. Financial transactions

- 5.1 ATM facilities
ATMs are not to be located in close proximity to designated gambling areas, or in the entry to gambling areas, where safe and practicable.
- 5.2 Cashing of cheques and payment of winnings
Gambling providers or sectors of the industry are to establish a limit above which all winnings are paid by cheque or electronic transfer; gambling winnings above the set limit are paid by cheque and are not to be cashed on the gambling provider's premises until the next trading day or within 24 hours of the win; the following cheques can be cashed only by prior arrangement – cheques not made payable to the gambling provider, cheques not made payable to the person presenting the cheque, multiple cheques.
- 5.3 Credit betting (lending of money)
Gambling providers are not to provide credit or lend money to anyone for the purpose of gambling.

6. Advertising

- Gambling providers are to develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by gambling. Specifically, these strategies will ensure that any advertising or promotion:
- 6.1 complies with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers;
 - 6.2 is not false, misleading or deceptive;
 - 6.3 does not implicitly or explicitly misrepresent the probability of winning a prize;
 - 6.4 does not give the impression that gambling is a reasonable strategy for financial betterment;
 - 6.5 does not include misleading statements about odds, prizes or chances of winning;

- 6.6 does not offend prevailing community standards;
- 6.7 does not focus exclusively on gambling, where there are other activities to promote;
- 6.8 is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups;
- 6.9 does not involve any external signs advising of winnings paid;
- 6.10 does not involve any irresponsible trading practices by the gambling provider;
- 6.11 does not depict or promote the consumption of alcohol while engaged in the activity of gambling; and
- 6.12 has the consent of the person prior to publishing or causing to be published anything which identifies a person who has won a prize.

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

While the Code is voluntary, Queensland Treasury estimated that almost 3,800 gambling venues across the state would be implementing it (Queensland Responsible Gambling Advisory Committee 2002). Various measures were adopted to encourage venues to implement the Code. The major ones comprised:

- developing and distributing the *Queensland Responsible Gambling Resource Manual*, a management manual to assist gambling providers to implement the Code
- provision of training in implementing the Code, provided by various registered training providers in Queensland
- support and involvement of the industry associations and the casinos
- placement of responsible gambling signage in venues by the Queensland Office of Gaming Regulation (QOGR), and
- a review of the Code to assess its implementation (Phase 1), any resulting cultural shift (Phase 2) and its sustainability (Phase 3).

At the time of this research, only Phase One of the review had commenced, consisting of a self-audit survey of gambling venues in Queensland. The current study sought to complement that survey by providing an independent evaluation of the Code's implementation and by collecting qualitative data to illuminate any issues and challenges facing gambling venues, management and staff during the Code's implementation. Further, this study sought to investigate how the Code's implementation might differ in various regions of Queensland. As noted earlier, Longreach was selected to provide insights into how being located in a remote region may affect this. A discussion of distinctive characteristics of remote areas and a brief history and description of Longreach are now presented to contextualise this case study.

Characteristics of Remote Areas

Australia's population resides across a wide range of locations, from large coastal cities to isolated, outback places (Australian Bureau of Statistics [ABS] 2003a). While the degree of remoteness experienced by people is heavily influenced by their geographic location, access to services, such as health and education, and to opportunities for employment and social interaction, can also influence experiences of remoteness (ABS 2003a). The ABS therefore uses an index of remoteness (the Accessibility/Remoteness Index of Australia) based on the road distance to different sized urban centres, where the population size of those centres is considered to reflect the range and types of services available (2003a). Australia is classified into six areas according to this index – major cities, inner regional, outer regional, remote, very remote and migratory (ABS 2003a) - with Longreach classified as remote.

Demographically, remote areas in Australia are characterised by a virtually stable population size, a high proportion of indigenous people, a low proportion of people born overseas, and a low proportion of non-English-speaking people, compared to most other areas (ABS 2003a). They also contain a comparatively higher number of males than females, a lower proportion of young adults and older people, and a higher average number of children (of any age) (ABS 2003a). Remote areas are also characterised by an over-representation of people living in areas of high socio-economic disadvantage (ABS 2003b). Such areas typically have high proportions of low income families, unemployed people, people without educational qualifications, households renting from public housing, and people in unskilled or semi-skilled occupations (ABS 2003b). Such features have contributed to increasing concerns over a number of years about the difficulties faced by people residing in remote areas of Australia in accessing basic services and over the extent to which the health of such residents is poorer than those with greater access to health, welfare and other services (Glover & Tennant 2003).

Importantly for this research project, it appears that problem gambling and regular gambling may be over-represented in remote areas, although research to date is inconclusive on this. However, some socio-economic correlates of problem gambling – unemployment, low income and male gender – are over-represented in remote areas, as are some correlates of regular gambling – low education levels, male gender and living in non-metropolitan areas (Productivity Commission 1999). Combined with lower access to welfare services in remote areas, it therefore appeared important to assess the implementation of a code of practice aimed at reducing harm to gamblers in a remote region like Longreach.

Longreach

The remote town of Longreach is situated in central west/outback Queensland, approximately 1,200 kilometres northwest of the state capital Brisbane. It is an

important regional centre, set in a semi-arid zone, with a population of approximately 4,500 people (http://www.longreach.net.au/lre_history.html).

The history of European settlement in the area is quite young. Prior to the 1860s, three Aboriginal tribes occupied the land now known as Longreach Shire (Moffatt 1987). In 1860 the area's potential for pastoral productions was recognised, and thus began the period of European settlement (http://www.longreach.net.au/lre_history.html). The town itself was gazetted in 1887, and the completion of the rail link in 1892 catalysed Longreach's growth. It soon had, amongst the general range of services required by a town of its size and stature, several hotels (Moffatt 1987; Fitzgerald 2002).

In fact, the first building in Longreach was the Longreach Hotel. By 1890, the Railway, the Commercial and the Royal Hotels were built. Hotels in Longreach were used for many community purposes. White's Imperial Hotel publicised the Federation referendum results on a blackboard as results from all of Queensland came to hand. The Welcome Home Hotel provided the venue for celebrating news of the Federation victory. Government officials on state visits usually stayed at the Commercial Hotel (Moffatt 1987).

A men's club, the Longreach Club was formed in the 1890s and became a popular social gathering place for members. They could relax in quiet surroundings free of the lively activity found in local hotels. Club rules of conduct and membership were strict. Other clubs or societies active in Longreach were the United Friendly Society and the Masonic Lodge. Between them, they hired a doctor for the town, helped fund a town band, built a hall for local functions and were involved in many community projects (Moffatt 1987).

The Longreach Jockey Club formed in 1890, was in response to the requests of the local Progress Association. Racing was an important part of life, with race meetings held over several days, often in conjunction with the local agricultural show or other social events and at one stage, there were three race clubs in Longreach. Horse racing dominated the sporting and social calendar, with race meetings often the only opportunity many had to socialise with neighbours and friends. It was an opportunity to establish links between town people and those living on the land (Moffatt 1987).

Politically, Longreach is associated with the beginnings of the Australian Labor Party, when in 1889, a group of pastoralists jointly agreed to reduce shearers' wages, sparking the great Queensland shearers' strike of 1891. While the strike action originated in nearby Barcaldine, railway workers from Longreach and surrounds participated, and Australia's labour and political movement grew out of this bitter strike (Fitzgerald 2002).

In 1899, Queensland voted for Federation to become part of the Commonwealth of Australia. At that time, there were strong moves to establish separate states in northern and central Queensland, people felt it was both 'ridiculous and unfair' that Queensland should be governed from Brisbane in the far south-east of the colony (Fitzgerald 2002, p. xiv).

More recently Longreach has developed into a tourist destination. From a hangar at Longreach Airport, Qantas' first operational base was established between 1922 and 1934, and the allied forces used Longreach as an air base for their Pacific operations in World War II. From this small beginning, an aerial transport system developed. The Qantas Founders' Outback Museum was created and is now a nationally recognised tourist feature (Fitzgerald 2002). The building of the Stockman's Hall of Fame and Outback Heritage Centre has further enhanced Longreach's development as a tourist centre, and this national monument, built to preserve the heritage of Australia's pioneers, opened in 1988 (http://www.longreach.net.au/lre_history.html).

Because of its history and isolation, Longreach has built a strong community spirit. In early times, community agitation for local schools, hospitals and public facilities, their joint efforts to fight fires and ensure adequate, permanent water supplies in droughts, and their political activities to form a local Shire and control their own future, helped to establish a strong independent society. In later times, their keenness to develop effective communication and transport systems reduced the isolation of, and improved the quality of, outback life. The establishment of the Country Women's Association and the building of a hostel for the care of outback women and children, the lobbying to build a Pastoral College and a Centre for Distance Education were successful community efforts to overcome the tyranny of distance and to build educational and social capital in the community (Moffatt 1987). Over the years, Longreach has grown to become the largest town in central western/outback Queensland. Given its history, it seemed a suitable site for this investigation into the implementation of the Queensland Responsible Gambling Code of Practice in a remote location.

Methodology

In order to assess the implementation of the Queensland Responsible Gambling Code of Practice, this study was undertaken late in 2002, about six months after its launch. The aim was to investigate the perceived efficacy of the Code in selected Queensland hotels, casinos and clubs in various case study areas in Queensland, representing remote, regional and urban areas. More specifically, the project examined gambling providers' awareness of the Code, their implementation of its provisions, and their views on its likely effectiveness. From these data, various facilitators and impediments to implementing the Code and to meeting its objectives were revealed, both in general, and those distinctive to the venues' remote, regional or urban location.

This paper reports the findings from only one of these locations, Longreach in remote Queensland. Longreach has five hotels and clubs with gambling facilities. The researchers visited four of these venues - three hotels and one club - for data collection. One club was closed and not included in the study. The

four venues visited operated a total of 64 gaming machines, while two of the venues also operated keno, and one a TAB outlet.

Voluntary gambling Codes of Practice are a relatively new phenomenon in Australia. Examples include the 1999 Clubs QLD *Advertising Code of Ethics*, the NSW Australian Hotel Association's 2003 *Hotel Gaming Code of Conduct*, and TABCORP Holdings' 2000 *Responsible Gambling Code*. Despite the existence of these codes, there has been little publicly available evaluation of their effectiveness. Thus, a largely exploratory qualitative method was developed for this study, although some quantitative self-assessment was used to support the findings. Consistent with many qualitative research approaches, the results of this study are not generalisable to other remote regions (Taylor, 2001). A further characteristic of this research approach is that the data obtained is rich and thick (Davis, 1998). Thus, the context – particularly the time and location – are key determinants of the results.

To guide this investigation into the perceived efficacy of responsible gambling strategies in Queensland hotels, casinos and licensed clubs, the public health literature on program evaluation was reviewed to locate an appropriate theoretical framework. Many such frameworks view the planning and evaluation of public health programs as a cyclic activity with ongoing reviews enabling continuous improvement of that program. The planning and evaluation cycle for public health programs developed by Hawe, Degeling and Hall (1990) guided this research. This practical evaluation considered the program goals, objectives and activities (see Breen, Buultjens and Hing 2003). The research design was based on three main methods – a questionnaire, management and staff interviews, and on-site observation of venue practices.

To measure the implementation of the Code, a tick box questionnaire was developed, listing each of the forty-eight elements comprising the six major categories of the Code (Table 1). Managers and staff in charge of gaming were asked if each element had been implemented or not. Using a questionnaire based on the six major categories of the Code, venue managers and staff were asked to identify those parts they had implemented and those they had not.

An ensuing interview discussed the practices implemented and those not implemented by the venue, reasons for any problems with implementation, and any other consumer protection and harm minimisation practices they used.

Perceptions of the likely effectiveness of the Code were investigated using these same semi-structured interviews. Managers and staff were asked for their views on how effective each of the six practice areas of the Code would be, and qualitative data was gathered on the reasons for their assessment.

To identify the obvious practices already implemented under the six major categories of the Code, a site visit was undertaken. A tour of the venue with managers or staff identified the 'visible' consumer protection and harm

minimisation measures accessible to gamblers (eg, provision of information and signage; physical environment and layout). When available in each location, local newspapers, venue newsletters and a variety of venue print materials were examined to ascertain the style of advertisements, messages or themes highlighted and space allocation for different venue products.

For the interview or qualitative data, open coding was used by breaking down, examining and comparing data to find emerging themes. The analysis then pulled together emerging themes into meaningful core categories of results.

Results

The ensuing sections now present the key results of the study in terms of awareness of the Code, and implementation and perceived effectiveness of its provisions in the six practice areas as detailed in Table 1. Table 2 shows details of the implementation of the Code in Longreach for each venue and for each of the six practice areas of the Code.

Table 2: Implementation of the Code's Elements in the Longreach Venues

CODE OF PRACTICE ELEMENTS	SMALL HOTELS			SMALL CLUB
	1	3	4	2
1. Provision of Information				
Displays responsible gambling mission statement	Y	N	N	N
Displays help information in all gaming areas	Y	Y	Y	Y
Displays help information near EFTPOS/ATMs servicing gambling areas	Y	Y	Y	Y
Displays help information in toilets	Y	Y	Y	Y
Displays information on the responsible gaming policy document	N	Y	N	N
Displays information on the rules of play and odds of winning	N	N	N	N
Displays information on exclusion provisions	N	N	N	N
Displays information on gambling related complaints resolution	N	N	N	N
Displays information on financial transactions practices	N	Y	N	Y
Displays odds of winning a major prize	N	N	N	N

CODE OF PRACTICE ELEMENTS	SMALL HOTELS			SMALL CLUB
2. Interaction with Customers and Community	1	3	4	2
Establish links with support services	N	N	Y	N
Establish links with community	N	N	Y	N
Customer liaison provides information to customers	N	N	N	N
Support staff in providing assistance to customers	N	N	N	N
Provide assistance to staff with gambling related problems	N	N	N	N
Customer complaints system established and promoted	N	N	N	N
Ensure responsible gambling training is provided to relevant staff	N	Y	N	N
Owners, boards, managers receive appropriate information to guide decision making	Y	Y	N	N
3. Exclusion Provisions	1	3	4	2
Provide self-exclusion procedures and documentation	N	Y	Y	N
Offers self-exclusion contact information for appropriate counselling agencies	N	N	Y	N
Self-excluded customers supported in seeking mutual exclusion from other gambling providers	N	N	N	N
Does not send correspondence or promotional material to excluded customers	NA	NA	NA	NA
4. Physical Environment	1	3	4	2
Minors prohibited from gambling	Y	Y	Y	Y
Minors excluded from area where adults are gambling	Y	Y	Y	Y

CODE OF PRACTICE ELEMENTS	SMALL HOTELS			SMALL CLUB
Alcohol service encourage customers to take breaks in play	Y	Y	Y	Y
Intoxicated customers not permitted to continue gambling	N	Y	Y	N
Childcare facilities meet legislated standards	NA	NA	NA	NA
Staff in gambling areas not to encourage tips	Y	Y	Y	Y
Customers made aware of the passage of time	N	N	Y	Y
Customers discouraged from extended, intensive and repetitive play	Y	Y	Y	Y
5. Financial Transactions	1	3	4	2
ATM Facilities not located close to gambling areas	Y	Y	Y	Y
Est. limit above which all winnings are paid by cheque or EFT	\$250	\$250	\$250	\$250
Gambling winnings above a set limit are paid by cheque and not cashed at venue until next day	Y	Y	Y	Y
Prohibits cashing cheques not made payable to the venue	Y	Y	Y	Y
Prohibits cashing cheques not payable to the person presenting the cheque	N	N	N	N
Prohibits cashing multiple cheques	N	N	N	N
Does not provide credit or lend money for gambling	Y	Y	Y	Y
6. Advertising and Promotions	1	3	4	2
Complies with advertising code of ethics by AANA	NA	NA	NA	NA
Is not false, misleading or deceptive	NA	NA	NA	NA
Does not misrepresent the probability of winning a prize	NA	NA	NA	NA
Does not give the impression that gambling is a responsible strategy for betterment	NA	NA	NA	NA
Does not include misleading statements about odds, prizes, or chances of winning	NA	NA	NA	NA
Does not offend prevailing community standards	NA	NA	NA	NA

CODE OF PRACTICE ELEMENTS	SMALL HOTELS			SMALL CLUB
Does not focus exclusively on gambling	NA	NA	NA	NA
Is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups	NA	NA	NA	NA
Does not involve any external signs advising of winnings paid	NA	NA	NA	NA
Does not involve any irresponsible trading practices by the gambling provider	NA	NA	NA	NA
Does not depict or promote alcohol consumption with gambling	NA	NA	NA	NA
Obtains consent prior to publishing the ID of any person who wins a prize	NA	NA	NA	NA
Y - YES	N - NO	NA – NOT APPLICABLE		

Awareness of the Code

Despite advice from the club and hotel industry associations that the Queensland Responsible Gambling Code of Practice and the accompanying Resource Manual had been delivered to all relevant venues in the state, the managers of the four venues in Longreach were only vaguely aware of the Code. Copies of the Code had been delivered to two of the hotels, but one hotel and the club reported they had not received a copy. Additionally, only one hotel licensee had possession of the Resource Manual which accompanies the Code, but this licensee did not realise the manual was on the premises until the interview with the researchers when he remembered 'seeing something behind the bar'. The Resource Manual had in fact been sent to the owner/nominee of the hotel. It was coincidental that the licensee had come across the document. Thus, managers in Longreach were not really familiar with the Code, its provisions, or its requirements for operationalisation.

One reason for this low awareness of the Code was that related training had not been provided in Longreach. All four venue managers felt there was an essential need for training of managers and staff, but that the remote location of Longreach resulted in few training opportunities. This applied to training in hospitality management generally, not just to responsible gambling. However, the club manager interviewed mentioned that Clubs Queensland were running a workshop on the Code in Winton, a town about 100 kms from Longreach, in two weeks time. After participating in the interview with the researchers, it appeared that the manager gained an understanding of the importance of the Code and indicated that he and a staff member would attend the workshop. Generally, the managers would like to have seen more training offered in Longreach.

Like the managers, no staff at any of the venues had received any training in responsible conduct of gambling. Further, high staff turnover at the venues was reported to be a compounding problem. One manager noted that 'trained, reliable staff are hard to find and retain, even with higher than average wages'. All managers indicated that they had a very high staff turnover and that training staff was almost a waste of time because other employers would capture the value of their training. This high turnover also meant that training opportunities would have to be offered frequently to ensure all new staff were familiar with the Code.

Implementation and Perceived Effectiveness of Provision of Information

The managers of the four venues in Longreach were very aware of the need to have signage on problem gambling in their venues because an inspector/representative from the QOGR had visited to install these. Thus, problem gambling warning signs were on display in all venues. However, none of the venues displayed other signage identified in the Code, including a responsible gambling mission statement, a responsible gambling policy, information on the nature of games, game rules and odds, self-exclusion provisions, complaints resolution mechanisms, or key elements of financial transactions practices.

Further, all managers and staff felt that problem gambling signs would have little impact on encouraging responsible gambling. One person remarked, 'people will only take notice of what they want to'. This person felt that most gamblers would ignore the messages unless they became desperate. One manager felt that too much signage could actually become confusing and therefore ineffective. One manager commented, 'signs do not have any effect; they were torn down the first week they were put up'. Another said, 'people might see signage but it doesn't change behaviour'. Thus, there was low implementation of this area of the Code and little faith in its likely effectiveness.

Implementation and Perceived Effectiveness of Interaction with Customers and Community

Longreach does not have a dedicated problem gambling service, but agencies like Anglicare and the Salvation Army provide general welfare services. One venue manager had liaised with a local support service provider and this relationship had been developed in the first instance about a problem drinker. This person remarked that there was 'no need for a dedicated local service; it could be incorporated into an existing service'. The other three managers did not know of the existence of any local welfare agencies that could provide problem gambling support. However, all managers reported that the provision of support services would be beneficial and they felt that these support services had to be provided locally. It was the belief of all managers and staff that problem gamblers in Longreach would only be comfortable with local services. They were unlikely to ring the Brisbane numbers provided in the signage about problem gambling supplied by the QOGR.

In all venues, the manager was the customer liaison contact. Being a remote location with a small population, managers said that they or their staff personally knew most of their customers. They felt that, in the case of potential problem gambling, they would be comfortable suggesting to a customer that it was time to go home, to have a meal or collect children from school, in order to encourage that person to take a break from gambling. Other managers provided examples of how they had tried to help people with problems, even if that person had not sought help. One recalled that a patron, who has a disabled son, gambles all day when she comes into town. He took her aside and discretely noted that she was spending quite a lot of money. She became angry and said she only gets out once a month. He realised that, for one day in each month, this was her only time for herself. This personal concern for members of the community was seen to be a part of everyday life in an outback location.

There were no formal mechanisms for resolving customer complaints, although all venue managers were sure that, if their customers had a complaint, they would approach the manager or staff who would then report the complaint to the manager.

Implementation and Perceived Effectiveness of Exclusion Provisions

All four managers were sympathetic towards problem gamblers and were willing to facilitate self-exclusion. One manager had been approached by a person wanting self-exclusion and the exclusion was undertaken informally. Another noted that longevity in the hotel business meant that he has had to be responsible with alcohol and gambling, or he would never have been permitted to stay in the business for so long. Further, he said that, although he had not been approached by any customers seeking assistance, 'he would certainly help them if approached'. However, none of the venues had a self-exclusion policy or any supporting documents.

As only one manager had developed any relationship with counselling agencies in Longreach, he was the only person who said he could provide customers seeking self-exclusion with information on counselling agencies. The other venue managers suggested that they would give customers the phone numbers provided on the problem gambling signs displayed in their venues. However, these were Brisbane numbers and the managers and staff suggested that it was unlikely that Longreach residents would feel comfortable about ringing a service in metropolitan Brisbane. Managers and staff were sympathetic to the plight of problem gamblers and their families. On an informal basis they reported that they would call in help from the local pastor or Salvation Army officer to assist a customer they felt was experiencing problems with their gambling.

All managers were happy to support customers seeking consensual exclusions from other gambling providers, although it did not appear that the managers had a great deal of contact with each other. Additionally, none of the venues had customer mailing lists so had no need of a policy to remove self-excluded

customers from these lists. Thus, all four managers were willing to implement self-exclusion procedures, but had not developed formal mechanisms to do so.

However, all four venue managers stated that self-exclusion was unlikely to be successful. Two felt it was of limited value as, once problem gamblers had built up sufficient funds, they would start gambling again. Two managers also felt that self-excludees could readily go to another venue and gamble. For example, the one manager who had excluded a gambling patron on request noted he was not certain that the person had not gone to other venues in the town during the exclusion. Another noted that, 'to be effective, everyone in town would need to be involved and every staff member would also need to be involved'. Another manager said that self-exclusion 'might stop them for a while, but it is not a long-term strategy'. Thus, the implementation and perceived effectiveness of self-exclusion was low in Longreach.

Implementation and Perceived Effectiveness of Physical Environment Practices

Prohibiting minors from gambling and gambling areas and unaccompanied minors from licensed areas is a legislative requirement, although included in the 'voluntary' Code. All managers and staff were aware of this obligation, but there was some ambiguity in its implementation. For example, two venues reported a patron leaving a child unattended while playing gaming machines and this was causing problems. Both venues had taken steps to warn or exclude this person. One venue, taking a formal approach, was sending the person a letter warning them not to continue this practice. The other venue took an informal approach and asked the person to leave when she appeared with the child and started to gamble. Managers and staff were concerned for the welfare of this pair.

The venue managers were also aware of their obligations in relation to preventing intoxicated people from playing gaming machines, but again there was ambiguity in implementation. Two managers stated they excluded intoxicated people from playing the machines; however another two managers stated they would only exclude intoxicated people if they were causing inconvenience to other patrons. In saying this, most of the venues had video cameras and staff were continually monitoring the gaming, bar and food service areas.

All venue managers stated they discouraged extended hours of play by not offering alcohol service in gambling areas. In addition, gamblers had to leave the gaming room to go to the ATMs, EFTPOS, to get change and to eat. The four venue managers believed that encouraging people to take a break from gambling would help problem gamblers. One manager maintained that making a gambler get cash in front of other people would reduce gambling on gaming machines because in Longreach there was a certain level of privacy or stigma associated with people playing gaming machines. This person said that 'changing \$50 and \$100 notes in front of others at the bar is a deterrent'. It was then suggested that this was not the case for all gambling, as historically Longreach has had a long cultural association with horses. However, wagering on horses was culturally more acceptable than using gaming machines.

None of the venues provided childcare facilities, so this part of the Code did not apply. All managers stated that staff are asked not to encourage customers to give them gratuities, but they all said they could not be certain that this does not happen. Only one venue had a clock in the gaming room and three venues had windows in their gambling areas. Two of these venues had their windows covered to avoid outside observation of gaming machines - a legislative requirement. The gambling areas in all four venues had, to varying degrees, natural light filtering through. The paradox of this element of the Code is that, whilst natural light allows people to keep better track of time, covering windows to prevent outside observation of gaming areas is a legislative requirement. However, provision of clocks and natural light were generally considered important strategies by the interviewees in assisting with responsible gambling.

Implementation and Perceived Effectiveness of Financial Transactions Practices

Two venues had ATMs and two had EFTPOS, but none were located in the gambling areas. Payment of gaming machine winnings over \$250 by cheque or electronic transfer, while being an element of the Code, is also a legislative requirement for clubs and hotels. All venue managers were aware of this obligation.

Contrary to the provisions of the Code, all venue managers stated that they cashed third party cheques and two stated they cashed personal cheques. One venue cashed cheques only for known locals. The managers also stated it was possible that multiple cheques from the same patron were cashed in one day because of different staff working on different shifts. However, none of the venues provided credit for gambling purposes.

In terms of perceived effectiveness, this practice area drew different responses. Two managers said they 'didn't know' whether rules and limit on financial transactions were adequate. The two other managers felt they were adequate since the limits on cash payments of prizes gave the winner a period to cool down after a big win. One manager commented that 'many people, if they were paid winnings in cash, would put it straight back'. In contrast, another said, that 'if a person has a wad of dollars in their pocket then the \$250 cash prize limit won't make any difference'.

Implementation and Perceived Effectiveness of Advertising Practices

Very little advertising of gambling was undertaken by the Longreach venues. Three had only a sign on the front of their buildings, while the other listed venue facilities (including gambling activities) in promotional material. All the venue managers stated that their advertising would comply with the Advertising Code of Ethics adopted by the Australian Association of National Advertisers. However, mixed views on the likely effectiveness of responsible advertising practices were expressed. Two managers felt that they would have little impact on ensuring responsible gambling. The other two managers believed that current

approaches to advertising and promotions did help promote responsible gambling.

In summary, the four venues in Longreach had low awareness of the Code, low implementation rates of most of its elements apart from practices that were legal requirements, and little confidence in the potential effectiveness of provision of information and self-exclusion. However, there was more agreement that management and staff training, local counselling services and appropriate physical environments in gaming rooms could assist in encouraging responsible gambling. Mixed views were held on the likely effectiveness of the Code's financial transactions and advertising and promotions policies.

Discussion

In analysing the results presented above, a number of distinctive features of remote communities can be identified to help explain the general reticence shown towards the Code and its potential effectiveness in Longreach.

Limited Access to Counselling Services

It is apparent that welfare services that provide advice and support for problem gambling are very limited in Longreach. As such, people seeking such assistance would need to attend general counselling services which are likely to have limited experience with gambling problems, or seek assistance from a Brisbane based telephone helpline service. It is probable that the history of the town, with its relative isolation from and suspicion of the more heavily populated southern areas - as characterised by the motion to divide the State at the time of Federation - has contributed to this lack of a high opinion for the services available in Brisbane. Additionally, the lack of a dedicated problem gambling counselling service in Longreach means that most gambling venue managers and staff would not know where to refer patrons to for help. Further, local problem gambling agencies in other communities are often proactive in raising awareness of the issue at the local level, with community and industry liaison often a key role. Clearly, this is not the case in Longreach, and so this may have contributed to the low priority given by venues to the Code and its provisions.

Fewer Training and Education Opportunities

A major impediment to awareness and implementation of the Code was a lack of management and staff training in responsible gambling provided in Longreach at the time of the study. This meant that the Code itself and the accompanying Resource Manual had not been disseminated widely, or where it had been delivered, had received little attention from venue personnel. Lack of understanding of the Code and its provisions probably also fuelled some scepticism about its potential effectiveness. Further, managers and staff felt that more training and education in hospitality management should be available for

people in remote regions of Queensland, with one commenting that venues in remote areas 'get ignored unless something goes wrong'. More training and education of venue personnel could be expected to lead to more professional management and service, which in turn may make venue staff more accepting of changed policies and practices intended to raise the social responsibility of the industry.

Fewer Banking Services

An important role played by pubs and clubs in remote regions is as 'pseudo banks', particularly given the gradual reduction in banking services in smaller towns in Australia. While Longreach has a bank, workers such as shearers coming to town with a monthly paycheck may rely on the hotels and clubs to cash these cheques outside banking hours. Thus, there has been a long history of cashing third party cheques in Longreach and this may be very difficult to stop, given the isolation of many local residents, the long distances that they travel to get into town, and the infrequency of such trips.

General Scepticism about Policies Imposed from Brisbane

Distance from the capital for remote communities produces feelings of isolation and neglect on some issues, which in turn can lead to a general view that 'cityfolk' do not understand the issues facing people living 'west of the Divide', nor the best way to address those issues. Thus, while the venue managers and staff were generally compliant with their legal obligations, they felt that 'best practices' developed outside their community might not be the best approach in Longreach. The Code was seen as being imposed from outside the community, thus undermining its acceptance. Further, the role of government bodies such as the QOGR was perceived as a policing one to detect breaches of legislation, rather than a source of information and advice. Similarly, the relevance and usefulness of industry associations was not so apparent to the venues in Longreach.

Strong Community Spirit, Pride and Independence

Contributing to the apparent anti-city sentiment noted above was the strong sense of community pride and independence noticeable in Longreach. This community has a long history of dealing with its own problems in its own way, and of looking out for others in the community without external intervention. A positive effect of this is that the venue managers and staff appeared to have a genuine concern for the wellbeing of their patrons and a willingness to help in whatever way they could. However, this also means that these managers were very dubious of the need for the formal policies and procedures contained in the Code in a small community like Longreach.

Fewer Opportunities for Social Interaction

In isolated communities where many people live on properties and stations, a trip to town represents one of the few opportunities for social interaction. One interviewee remarked that 'country outback people like to socialise when they come to town. They like to talk, meet and greet, eat, shop, drink with friends, family and local business people'. They often live in isolated places, sometimes a long distance from town and so 'the last thing they want to do is participate in an isolated solitary activity like playing gaming machines'. One manager recounted that people in the outback find their gambling needs met in horse racing, going to the races and the TAB. Thus, the historical position of the racetrack as an important social and community venue, where horses are a big part of work and leisure in this remote community has been, in part, refocused to the modern TAB. Going to the races continues to be a social event, a place to meet, to socialise, and to conduct business, to make contacts as well as relax and have a bet. As such, the managers noted that gaming machines are not particularly popular in Longreach and, in fact, playing the machines seems to carry some social stigma. Therefore, they saw very little likelihood of people developing gambling problems with the machines, and so little need for the Code.

Limited Importance of Gaming Machines

The limited popularity of the machines has also meant that, for most venues, gaming machines are not a central part of their business. In fact, one hotel manager described them as a 'nuisance', and was only keeping them so as not to diminish the resale value of the hotel. Again, this seemed to undermine the perceived importance of the Code. However, while the importance of horse racing and the TAB has been emphasised previously in this paper, as inferred from discussion with respondents, the town only supports one standalone TAB. Thus, while the operators down-played the importance of gaming machines for their operations and justified their attentions to the Code in this manner, it is probable that the machines have greater value when considered as part of the competitive mix that attracts locals and the increasing number of tourists to their venues.

In summary, the 'tyranny of distance' has impacted on the extent to which the Queensland Responsible Gambling Code of Practice has been implemented in Longreach because certain characteristics of this remote community are markedly different from those in urban and regional areas. Fewer accessible services, less training opportunities, a scepticism of policies imposed from outside, strong community cohesion and independence, fewer opportunities for social interaction and the limited popularity of gaming machines have undermined the acceptance of the Code.

Conclusion

This paper has discussed a study into the implementation of the Queensland Responsible Gambling Code of Practice in one case study region, Longreach. It

was found that the managers and staff of gambling venues in Longreach had little awareness of the Code, had implemented few of its provisions, and were generally sceptical about its potential effectiveness. While the results are limited to the small number of gambling venues in the town, they do provide insights into some challenges faced in implementing the Code in a remote location. Distinctive features of remote locations, including fewer services, less training opportunities, resistance to policies imposed from outside, strong community cohesion and independence, few opportunities for social interaction and the limited popularity of gaming machines, have been instrumental in this low implementation rate. While further research is needed to establish whether other areas in remote regions are experiencing similar problems, the results from Longreach identify particular challenges for the hotel and club industries seeking to provide gambling services in a more socially responsible manner.

Acknowledgements

Financial assistance for this research project was provided by the Research and Community Engagement Division of Queensland Treasury.

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