

EXAMPLE 2

On 27th April between 6:00am and noon this person withdrew \$200 from an ATM not located at a gaming venue. They did not gamble or visit a gaming venue on this day.

Date	Did you withdraw money from an ATM today? Where did you withdraw this money? How much did you withdraw?				Did you get any extra cash out from EFTPOS today? Where did you withdraw this extra cash out? How much did you withdraw?				Did you gamble today? Which gambling venue did you use? How much did you gamble?				If played the pokies and inserted notes – which notes did you insert?				Did you gamble till all this money was gone?		
	Gambling Venue			Other	Gambling Venue				Club	Casino	Hotel / Tavern	TAB	\$5	\$20	\$50	\$100	Yes	No	
	Club	Casino	Hotel / Tavern		Club	Casino	Hotel / Tavern	TAB											
27/04/04				\$200															
6:00 am – Noon	\$	\$	\$	\$200	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		
Noon - 6:00 pm	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		
6:00 pm – Midnight	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		
Midnight - 6:00 am	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		

EXAMPLE 3

On 29th April between 6:00pm and midnight, this person gambled \$100 at a club. They inserted a total of \$100 into a note acceptor (five \$20 notes). They gambled until all this money was gone. They did not withdraw money from an ATM or EFTPOS on this day.

Date	Did you withdraw money from an ATM today? Where did you withdraw this money? How much did you withdraw?				Did you get any extra cash out from EFTPOS today? Where did you withdraw this extra cash out? How much did you withdraw?				Did you gamble today? Which gambling venue did you use? How much did you gamble?				If played the pokies and inserted notes – which notes did you insert?				Did you gamble till all this money was gone?		
	Gambling Venue			Other	Gambling Venue				Club	Casino	Hotel / Tavern	TAB	\$5	\$20	\$50	\$100	Yes	No	
	Club	Casino	Hotel / Tavern		Club	Casino	Hotel / Tavern	TAB											
29/04/04																			
6:00 am – Noon	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		
Noon - 6:00 pm	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		
6:00 pm – Midnight	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$100	\$	\$	\$	\$	\$100	\$	\$	✓	
Midnight - 6:00 am	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$		

Appendix G – Clubs ACT Comments

ClubsACT: COMMENTS ON THE ANU'S CENTRE FOR GAMBLING RESEARCH PROJECTS ON USE OF ATM'S

Introduction

In Australia clubs provide a popular venue for socialising, an inexpensive form of entertainment and a major economic contribution to local communities. There are approximately 4,000 licensed clubs in Australia. Clubs are widely dispersed, with more than 60% located in regional Australia. These clubs, generally smaller than their metropolitan cousins, are centred in country towns where their presence has a major economic and social effect. More than 6 million Australians are members of a club.

Clubs provide a wide range of entertainment including food and beverages at reasonable prices, access to sport and fitness facilities, social activities, and a venue for socialising. Certain groups in society, such as the elderly, take advantage of the reasonable prices offered by clubs. They would not otherwise be able to afford the type and quantity of entertainment provided. Clubs also provide a safe environment for entertainment and recreation, which is a concern for women and elderly members of the community.

Clubs are not-for-profit entities, prohibited from distributing surpluses to individuals. Because clubs respond to community needs rather than corporate return, they often are the source of key investment in local capital expenditures. Without such club investment, some of these needs would not be met.

In the ACT, ClubsACT represent 42 club groups covering 57 venues or the vast majority of licensed community based clubs operating in Canberra.

About 80% of adult Canberrans belong to one or more of our sporting, social, cultural, worker, professional and returned service clubs. In aggregate membership of clubs in the ACT is over 400,000, with the larger clubs having memberships in the range of 30,000 to 70,000.

Clubs are a vital part of the ACT economy – they have combined net assets of about a quarter of a billion dollars, gross revenue of over \$250 million, gross expenditure of \$210million and employment and related costs of \$53 million. It is estimated that clubs contributed about \$440 million worth of flow-on benefits to the ACT economy and over \$300 million in terms of value added.

Clubs are also a major employer in their own right with nearly 1,900 people directly employed and just over two thirds being young people, working on a part time or casual basis. Overall the clubs account for about 3,400 full and part time jobs directly and indirectly each year.

The club industry, as not for profit mutual organisations, continues to invest most of its operating surplus to improve member services and facilities, including community infrastructure.

In 2002/03 Canberra's licensed clubs contributed over \$15.8 million to a very wide range of charitable, sporting and community organizations - \$8 million more than required under the legislation - bringing the total contribution to eligible community recipients over the last six years to over \$70 million.

In 2002/2003 the club movement held 65 gaming licenses, operated 4,960 gaming machines and generated gross gaming machine revenue of \$182 million. Clubs paid \$44.5 million in gaming tax and other charges to the ACT Government.

Harm Minimisation

As a general comment, the vast majority of club patrons utilise the recreational and entertainment services of the clubs as they are intended and the gaming activities conducted by clubs do not of themselves cause problem gambling. Nevertheless, clubs recognise that the gaming activities do provide an opportunity for some people to pursue these activities in a way that may have a harmful impact on them, their families and the community - a broad definition of a problem gambler.

As the major providers of gaming services in the ACT, clubs understand and accept that they have a responsibility to their members and the broader community to provide and support proactive measures to help mitigate these problems.

ClubsACT were signatories to ACT Gaming Industry Voluntary Code of Practice in August 1997, and ClubsACT had developed and promulgated their own Code of Practice to provide clubs with guidelines on the implementation and maintenance of responsible gaming practices.

More recently ClubsACT strongly supported the development of a Gambling Code of Practice covering all classes of gambling that was mandatory and enforceable and which would encourage best practice in the provision of responsible gambling service in the ACT.

Adopting best practice and adherence to the first mandatory Code of Practice is a clear demonstration of each club's commitment to responsible gaming. It is also an important indication that the club movement takes its social responsibilities seriously.

Further evidence of this is the major initiative of 11 clubs under the auspices of ClubsACT, and in partnership with Lifeline Canberra, to establish the Clubcare Program at annual cost of over \$440,000 per year.

However, clubs do not assume any responsibility for the personal decisions of club members or their guests to gamble with such decisions being the prerogative of the individuals concerned.

Use of ATM's and EFTPOS

The issue of the relationship between accessibility to ATM's and problem gambling has been the subject of some focus in various reports including the Productivity Commission Report, the ACT Legislative Assembly Standing Committee Report, as well as in the context of the various iterations of voluntary and self imposed gambling codes of practice.

The findings of the 2001 AIGR Survey in the ACT suggested that nearly 47% and 74% respectively of problem gamblers and severe problem gamblers often or always withdraw money from ATM's to play gaming machines.

The provision of ATMs and EFTPOS facilities, along with other financial transactions such as the payment of winnings, is subject to State and Territory regulation designed to promote responsible gambling practice. This regulation is generally consistent across jurisdictions and any variation (such as maximum cash withdrawal levels or the number of withdrawals) reflects distinct business practices and regulatory needs that exist between jurisdictions.

Regulation takes the form of both legislation and mandatory and voluntary industry codes of practice. These instruments combine to protect patrons by controlling such things as:

- the location of ATMs and EFTPOS – most do not permit cash dispensing facilities to be located in gaming areas; and credit is not available from these machines;
- ATM signage – most require ATMs carry a notice advising of gambling counselling services; and
- payment of winnings in cash – these are generally restricted and for example in the ACT, the Gambling Code of Practice requires clubs to pay winnings in excess of \$1,000 by crossed cheque or electronic funds transfer, or the whole amount at the request of the patron.

ClubsACT propose to address the use of ATMs/EFTPOS and note acceptors separately.

What are the key issues, from your sector perspective, that need to be considered in relation to the accessibility of ATM and EFTPOS facilities at gambling venues and the associated impact on people with a gambling problem?

Clubs Australia and New Zealand (CANZ) estimate that 350 of Australia's 4,000 registered clubs provide ATMs for members, while 3,500 provide EFTPOS facilities. Primarily due to their high cost, ATMs are generally found in clubs with large memberships, while EFTPOS is found more widely.

Automatic Teller Machines (ATMs) and EFTPOS facilities provide a valuable service to club patrons, particularly in a city such as Canberra with its satellite towns and its geographic layout, as well as in regional areas where traditional financial institutions have withdrawn services.

A quick survey of the ClubsACT member clubs in June 2003 indicated that there are an estimated 47 ATMs in the 57 venues. The predominant bank is St George, followed by the Commonwealth; ANZ; Bankwest; and the others are not related to banks such Credit Union Services.

Canberra and other regional communities especially rely upon the financial facilities provided by clubs. In many regions where traditional financial institutions such as

banks have withdrawn their services due to business rationalization, clubs are the only suppliers of cash dispensing facilities.

Cash is used by club patrons for a wide range of goods and services, including food and beverage, live entertainment and sporting facilities, as well as gambling.

Clubs throughout Australia are mindful of their obligation to provide cash to patrons in a responsible manner. To achieve this, clubs are working cooperatively with governments to regulate such things as the placement of ATM facilities, the extension of credit to patrons and the electronic payment of prizes.

In our opinion, these measures offer the appropriate balance between the availability of cash to patrons and the provision of a responsible gambling environment.

How should the issues (you identified in question 1) be balanced so that the recreational/social gambler is not negatively impacted upon?

In the ACT, the current legislation prohibits the provision of cash facilities (ATM or EFTPOS facility) in a gaming area and prevents patrons withdrawing money from credit card accounts.

ClubsACT continue to believe that this is a sensible approach and it should continue.

What do you see as key factors for consideration if it is proposed to limit ATM and EFTPOS functionality and capability in gaming and gambling venues?

We believe the exclusion of cash facilities from premises altogether will simply encourage patrons to go the nearest ATM and possibly use their credit card for cash advances, not available from cash facilities in the club.

Clubs have other services on offer besides gaming and the vast majority of people use ATMs in clubs for reasons other than gambling, including food and beverage, live entertainment and sporting facilities. As such it represents an intrusion on patrons who do not have a problem with gambling and those that do would still have access to their money in one way or another

Club members also access ATM's to withdraw funds to use outside the club environment as clubs are seen as safe places to access cash.

Convenience is an important factor, particularly as banks are withdrawing from the suburbs.

The proposal which requires patrons to interact with staff to obtain cash via EFTPOS may alert the licensee to the problem gambler earlier. However it is very restrictive and resource intensive and is not warranted at this point to deal with a very small proportion of possible problem gamblers at the inconvenience of the vast majority of patrons.

If it were not possible to effectively limit access to ATM and EFTPOS functionality and capability in gaming and gambling venues, can you

References

- ACT Gambling and Racing Commission 2002. *Review of the Gaming Machine Act 1987 – Policy Paper*. Available at:
<http://www.gamblingandracing.act.gov.au/Documents/Policy%20Paper10.pdf>
- ACT Legislative Assembly 2003. *Government Response to the ACT Gambling and Racing Commission's Review of the Gaming Machine Act 1987*.
- Australian Institute for Gambling Research 2001. *Survey of the Nature and Extent of Problem Gambling in the ACT*. Report to the ACT Gambling and Racing Commission. Australian Institute for Gambling Research, UWS.
- Blaszczynski, A., L. Sharpe, M. Walker 2001. *The Assessment of the Impact of Reconfiguration of Electronic Gaming Machines as Harm Minimisation Strategies for Problem Gambling*. University of Sydney. Report prepared for the Gaming Industry Organisation [GIO], NSW.
- Centre for Gambling Studies 2003. *An Assessment of the Research on Technical Modifications to Electronic Gaming Machines in NSW, Australia*. Faculty of Medical and Health Sciences, Auckland University.
- Independent Pricing and Regulatory Tribunal of New South Wales (IPART) 2003. *Submissions on Review of Gambling Harm Minimisation Measures* by Council of Social Service of New South Wales (NCOSS). Available at:
http://www.ipart.nsw.gov.au/submiss/Gambling03_Sub/
- Kelleher, A. 1993. *The Unobtrusive Researcher. A Guide to Methods*. Allen and Unwin.
- KPMG Consulting 2002. *Problem Gambling. ATM/EFTPOS Functions and Capabilities*. Department of Families and Community Services.
- McMillen, J. *et al.* 2001. *Survey of Gambling and Problem Gambling in the ACT*. Report to the ACT Gambling and Racing Commission. Australian Institute for Gambling Research,
- McMillen, J., D. Marshall, E. Ahmed, M. Wenzel 2004. *Victorian Longitudinal Community Attitudes Survey*. Victorian Gambling Research Panel
- Productivity Commission 1999. *Australian's Gambling Industries*, AusInfo, Canberra