PARLIAMENTARY JOINT SELECT COMMITTEE ON GAMBLING REFORM
INQUIRY INTO PRE COMMITMENT SCHEMES

RSL VICTORIA SUBMISSION
7TH FEBRUARY 2011

1. Overview

This submission is prepared by the Returned & Services League (Victorian Branch) Inc on behalf of its seventy one (71) Licensed RSL Sub-Branches that operate EGMS as part of the diverse range of facilities and services offered to members and guests across the state. In preparing this submission, the RSL has consulted with its many stakeholders and presents a united view in our comments responding to the proposal by the Federal Government to introduce a mandatory pre commitment scheme across all jurisdictions by 2014.

From the outset the Victorian Branch and its network has always supported the continued implementation of proven measures to assist in the reduction of problem gambling. We fully endorse the Victorian Government's position to introduce a voluntary Pre-Commitment System across the state between now and 2015. There are still many unknowns regarding the intentions of the Government and how the delivery of a voluntary pre commitment strategy will look and work across the Victorian jurisdiction.

In a regulatory sense, RSL Sub-Branches have always been proactive and at the forefront of best practice in harm minimisation and responsible gambling initiatives. This has also been an ongoing challenge in other areas of our business relating to consumption of alcohol and smoking bans and the Government on many occasions, has acknowledged the outstanding contribution and commitment that the RSL has made in these areas.

We don't have a fighting fund to support a massive awareness campaign but what we do bring to the debate is a clear message for all concerned to fully understand the consequences of applying an impost that has not benefited those who have a problem with gambling in it many forms. Its seems every time there is a proposal to curtail problem gambling there is an anti gaming group that focus their attack directly at local clubs and hotels who operate gaming machines. There are many forms of gaming, gambling and betting available to individuals today. People have lost sight of how this all started and what The RSL's objective is in serving our members and the local community in which we have a geographic presence.

All we are seeking to do is to ask that some common sense be applied to the debate and to bring to your attention the harsh reality that we face going forward. The Victorian Branch of the RSL believes responsible gaming forms a vital part of the commercial activity that underpins the RSL's long term viability and relevance in the 21st Century. The RSL sees responsible gaming as an important part of fulfilling our organisational charter and core objectives and it's is in our interest to ensure that our members and visitors who frequent our venues are not at risk when they choose to use our facilities. They do so with the full knowledge of making informed judgement about how they intend to spend their leisure and entertainment dollar whilst in our care. The RSL movement has built its reputation around loyalty, trust and looking out for a mate in need. These principles apply equally to our commercial operations. We do not under any circumstance seek to expose the vulnerability of any individual who chooses to use our facilities and services.

What does go unrecognised is the significant contribution that we make each year to our veteran and local communities across Victoria in terms of welfare & community activities. In addition to the tangible benefits, RSL Sub-Branches provide a host of intangible benefits such as fostering social inclusion, improving the quality of life for the aged, and embracing younger generations. We are committed to education and community support and awareness, and this is reflected in the many activities our network undertakes each day.

THE RSL & GAMING:

The core objectives of the RSL are welfare and patriotic in nature, supporting service and ex-service men and women from the Australian Defence Force, and their dependants when in necessitous circumstances.

The RSL has seen their welfare and veteran support operations expand significantly over the past 15 years through revenue from gaming activity in our Licensed Sub-Branches. Not only that, but we have been able to expand our commercial operations and build a membership base that is estimated at approximately 150,000 Victorians including some 65,000 Service and Affiliate members and the remaining 85,000 social RSL Sub-Branch members. We are also working towards more equitable revenue generation from all areas of our operations and this is proving to be successful.

Gaming revenue has allowed the RSL to focus on its core objectives of supporting the veteran community by providing improved facilities and services to members. With the majority of members in their later years, RSL Sub-Branches have become safe havens for many elderly people who suffer from isolation; a major issue facing the Australian community as the years pass. Many of the older community members – whether ex-service or not – have chosen of their own free will to join and use their RSL as a social hub. They eat, drink, play sport, participate in day clubs, attend organised outings/excursions and in general, see their RSL Sub-Branch as a 'home away from home'. It is as a result of the income derived from gaming that has allowed this 'home away from home' to offer the services and facilities it does today.

RECOGNITION AS CHARITIES

RSL Sub-Branches in Victoria have been recognised by the Australian Taxation Office as being charitable in their nature.

In addition to this, a significant investment is made each year by government and gaming venues alike to record the Community Benefit of gaming across the state. Yet this information is never used to show what is returned to the community by gaming venues and how those monies have been used to support other community activities. It is our belief that this type of promotion would markedly improve the image of the industry. The Victorian RSL publish an annual CBS report highlighting the collective benefit that we provide as a network across the state in three key areas relating to supporting local communities and groups outside of the RSL family in cash, kind and volunteer hours. A copy of a recent statement is enclosed.

INDUSTRY STIGMA

The stigma attached to the gaming industry causes us serious concern. We are proud of the commitment and contribution we make to our communities. We also see the RSL as an employer of choice within the hospitality, entertainment and gaming sector in Victoria. The continued negativity surrounding the industry as a whole is making it harder and harder to attract talented, quality people who view the RSL as a career alternative.

The Victorian RSL network has invested significant resources and funds to ensure that it can continue to participate in the new Gaming Operator model post August 2012. As part of the new model our network was required to seek professional business and financial advice and to fully evaluate the financial benefits of gaming post 2012. As part of this process, the RSL network has made a mutli million dollar investment to secure Gaming entitlements to allow us to continue to participate in the industry post 2012.

The Victorian Government gave clubs a one off option to remain in the industry or to surrender their gaming operations post 2012 in making this decision clubs have guaranteed to government that they are able to participate based on financial data and previous annual industry trends to support their decisions, to gain some certainly about whether they could continue to fund existing debit and have capacity to fund capital investment required under the new owner operator model.

The industry is in a decline for many reasons and this is reflected in parallel with the economic climate across the country. We are required to make commercial decisions that can fall either way as to whether we have viable and sustainable RSLs.

We are significantly concerned about the ongoing viability of our commercial operations if the Federal Government is to impose a major regulatory change without serious consideration of the impact of imposing a mandatory scheme across the industry. The regulations continue to tighten with little regard for the long term impact to not only the existence of clubs but also to appreciate their reason for being what they stand for and the role they fulfil within the community. People have lost sight of why gaming was introduced in the respective states. The not for profit sector has every reason to be angry with the federal government's current stance regarding pre commitment because they do not share or see the direct consequences when a club is forced to close its doors for the last time. We are at an immediate disadvantage just by being a licensed club but we have never receive any concessions for the fact that we have restricted barriers of entry and that we are fair dinkum not for profits. We have made a substantial commitment to ensuring our future and we need to have certainly. We do not have the financial war chest hidden away for a rainy day as government continue to impose sanctions and regulatory compliance on us without the proper diligence and research to validate that such a major reform could be the straw that breaks the camel's back.

CLUB VS HOTEL CULTURE

It is important to outline the fundamental differences between Clubs and Hotels within in the gaming industry, and to further drill down and highlight the gap that exists between these two different liquor licence holders.

There are some fundamental differences between Clubs and Hotels that have not been taken into consideration.

- Clubs are not-for-profit entities
- Clubs are reliant on volunteers to take on the responsibility of overseeing the regulatory and commercial operations of a club
- Many of those volunteers have limited or no experience running a business or club operation
- There are stringent liquor licensing requirements governing the access to clubs for members and visitors. You are required by law to show ID either by membership or validation of personal details upon entry to a club
- There is the 5 & 10 km radius rule limiting access for gaming visitors.

The RSL is unique in the way that it can offer a cohesive, organised approach to responsible gaming on a significant scale. The reality of 'life in the RSL' is that our members are usually very well known to our management and staff and membership is reciprocal. So Service, Affiliate and Social members from one Sub-Branch can use their generic RSL membership card to enter and receive the benefits at another Sub-Branch within the state of Victoria and some other states in the nation.

All Visitors are required to provide ID and sign a member's register on entry each time they visit.

With new opportunities for 2012 the Victorian RSL network will be introducing a fully integrated loyalty system to our business which also has pre commitment functionality it will include a members kiosk on entry, all point of sale registers and player interface on EGMS. This new system will fully integrate with our magnetic swipe membership card and will allow us to communicate, promote, track and monitor our members and their habits whilst in our Sub-Branches:

- It provides a universal magnetic swipe card with personal identification number issued to every member
- Has the capacity to limit or refuse access with the ability to track and monitor member activity and spend patterns
- Allows self-regulation to become a practical reality rather than a theoretical ideology with one card across a wide area network which currently operates on limited functionality
- In addition it allows members to feel a certain sense of self-responsibility when they enter our premises as information about them is recorded and kept on record.

RSLs are not-for-profit entities:

- Sub-Branches are structured as incorporated entities in their own right
- Their core aim is the fulfilment of RSL & Welfare objectives
- All surplus earnings are distributed into the broader community
- Facility development and Sub-Branch rationalisation is a practical reality
- The RSL Sub-Branch network donated over $6.5 million in cash and kind to community groups and initiatives unrelated to veteran welfare last year
- 1.25 million volunteers hours were recorded and audited last year
- RSL Sub-Branches employed approx 2,500 full and part time staff.

THE PREVALENCE OF PROBLEMS WITH GAMBLING

It is interesting to note that since the 1999 Productivity Commission Report into the gaming industry, the instance of problem gambling has not increased. Indeed, there is evidence to show that is has decreased.

RSL Sub-Branch memberships in Victoria have been growing steadily over the past 10 or so years and with the higher visitation that accompanies growing membership numbers, we experience a negligible amount of alcohol or gaming related issues. At present, we are unable to validate those who have sought help via the RSL network.

We place great importance on having a diverse service and product offering in our Sub-Branches and believe we have a very keen awareness of, and commitment to, acting responsibly and showing a duty of care for our patrons, members, staff and stakeholders.

We understand that evidence is showing that problem gambling is not an isolated issue. In fact it is often a symptom of other deeper issues which need to be addressed. Although this is a serious issue and warrants close, ongoing scrutiny and monitoring, the vast majority of Victorians participating in gaming do it as a recreational activity without any lasting effects, much like any other social activity undertaken.

RSL Victoria has a number of initiatives in place and/or ready to proceed in relation to counselling services, promoting self-help and providing a standard of service that is above and beyond expectations.

RSL CODE OF CONDUCT

The RSL in Victoria has already implemented a strict code of conduct for our staff, members and visitors

RSL ASSIST

The RSL has been working with the Victorian Government for some time in developing a new RSL Assist program.

RSL Assist is a dedicated RSL Network helpline which will provide a private, easily accessible support service to people in need. Where an issue results in ongoing counselling with a qualified psychologist, our individual Licensed Sub-Branches have undertaken to cover this cost. When a caller is not an imminent threat to themselves or others, they will be referred immediately to the most appropriate external specialist counselling service such as Gambler's Help or Alcoholics Anonymous. For callers who pose an immediate risk to themselves or others, a TCA trauma specialist will be engaged on the spot to attend to the issue at hand. The associated cost for this TCA trauma specialist will be met by the appropriate RSL Licensed Sub-Branch (i.e. the Sub-Branch where the caller came from and found out about RSL Assist).

The RSL Assist service provides staff with a qualified reference point which mitigates the need for them to act as 'off the record' counsellors when faced with a member or patron in need. They won't even have to assess that need; they can simply refer the member/patron to RSL Assist.

The RSL Assist hotline will be manned by a fully qualified counsellor and will provide RSL people with free and confidential access to counselling, advice, support services and referrals for a range of issues including:

- gambling, alcohol, drug, addiction, and related issues,
- grief, marital, relationship and family issues,
- emotional, physical and sexual abuse,
- Anxiety, depression and stress issues.

In addition to providing the initial assistance for these issues, the helpline will also be able to link RSL people with specialist support and counselling agencies such as:

- Gambler's Help
- Alcoholics Anonymous
- Beyond Blue
- Lifeline and
- Salvation Army.

The aim is to provide a recognised, centralised service that reflects the core values of the RSL in a discrete and confidential manner. Once operational, RSL Assist will be able to provide quantitative and qualitative data on the issues raised by members and what, if any action was required.

PRE-COMMITMENT STRATEGIES

RSL Victoria has offered to trial pre-commitment strategies within our network of Licensed Sub-Branches. To date, this offer has not been accepted by Government. It is vital that a pre-commitment system does not impinge on the use of gaming machines by recreational gamblers who account for the majority of the gambling population. Therefore any move towards a compulsory pre-commitment strategy would have serious repercussions for the commercial viability of the RSL network.

Self exclusion can be easily monitored within RSL Sub-Branches through the use of membership cards which are scanned upon entry. All relevant self exclusion information can be loaded into the membership card so that Sub-Branch staff are made aware of members who have self excluded and may be trying to access gaming machines.

THE RSL & GAMING: HOSPITALITY WITH A CONSCIENCE

- The RSL is in a unique position in Victoria and offers an unrivalled opportunity to trial harm minimisation and self regulation programs and quantitatively measure their impacts.
- RSLs are not money-making operations; there is a direct community benefit from gaming revenue in RSLs. Any surplus funds are used to improve facilities which in some instances are used by every, single local community group for meetings, sporting events and other social activities.
- RSL membership cards offer a unique opportunity to monitor and measure the movement of problem and 'at risk' gamblers within the network.
- The RSL Assist program will not only offer new data sources on problem gambling but will also directly help those at risk while identifying other potential contributing factors.
- The RSL's Code of Conduct goes above and beyond the call and shows a rigorous commitment to harm minimisation within the network.
- The RSL's offer to trail a pre-commitment program will help provide data to develop an appropriate voluntary pre-commitment system.
- The RSL fully supports Pre commitment as a voluntary option only and it adds to the ability for individuals to impose additional self-regulatory mechanisms.

In closing, why would we ever want our own people to harm themselves?

We provide welfare and community support to anyone who seeks our help; the RSL was created on the values of mateship, camaraderie and courage and maintains that focus to this day. We have certainly grown as an organisation with the introduction of gaming in this state but we have never lost sight of what our core objectives are.

We are committed to ensuring a safe, secure environment for those who chose to be our members, visitors and stakeholders, many of whom do invaluable volunteer work for the RSL within their local community. They are our lifeblood – without members, the RSL does not exist.