AMC Convergent IT



REVIEW OF GAMBLING HARM MINIMISATION MEASURES BY THE INDEPENDENT PRICING AND REGULATORY TRIBUNAL OF NEW SOUTH WALES

Submission By AMC Convergent IT

On the 26th of November 2003

AMC Convergent IT welcomes the opportunity to make this submission to the Minister for Gaming and Racing, the Hon Grant McBride MP, through the Independent Pricing and Regulatory Tribunal.

In examining the Issues Paper, we wish to comment on several of the harm minimisation measures listed in Table 1. We note, the Terms of Reference (attached as Appendix A, in the Issues Paper) from the Minister, seeks consideration of further harm minimisation measures that have been identified or proposed for adoption. We respectfully request your consideration of our proposal, referred to as *Gambler Subtle Assist* (*GSA*). *Gambler Subtle Assist* includes several of the measures listed in Table 1, and combined with other measures, forms a proposal for a complete solution to the gambling dilemma.

Without wishing to challenge the harm minimisation concept as a health and social issues approach generally, we do consider that our proposal provides an effective "solution" to certain problematic aspects of gambling and in this context a harm minimisation strategy could be seen as defeatist when a socially, politically, economically acceptable "turn key, end to end solution" is available.

Since August 2001, our organization has been actively engaged in researching and developing a universal solution to the complex issues of problematic gambling. We have achieved a systems solution, which effectively addresses the multi faceted and interdependent nature of the issues surrounding this dilemma. Our submission provides the way forward to minimising harm to problem gamblers and in some areas totally eliminate specific gambling problems facing the community, eg underage gambling. GSA fully supports "duty of care" issues as well as providing a platform capable of ready change to meet future gambler, community, industry or government needs. Our proposal achieves more than a balance between the needs of the community, industry and governments. We consider the solution we offer, effectively meets the needs of all stakeholders with little compromise to each group. Our proposal focuses on the global activities of the gambler over time rather than a single session or gambling activity. "Single session" focuses, can only hope to influence a gambler during that session, on that machine, and are easily defeated, by the gambler

simply moving to another machine or gambling activity. Our proposal ties these machines and activities together, thereby not being defeated. This provides harm minimisation and prevention measures aimed at the individual gambler, across all forms of wagering and gambling.

Structure of Submission

- 1. Response to specific Terms of Reference
- 2. Response to specific parts of the review
 - Social Impact Statements
 - Measures for accountability associated with funding
 - Increased Turnover
- 3. Our Proposal: *Gambler Subtle Assist* (separate document PowerPoint presentation)
- 4. Appendix 1
 Limitations of "smart" cards verses GSA card

1. Response to Specific Terms of Reference

"Circuit-Breakers"

Compulsory shut-down of gambling venues

This is an unnecessary imposition on all gamblers. We consider it unlikely to have any real effect on the gambling behaviour of problem gamblers. Given the now, round the clock working hours, this measure is more likely to inconvenience both problem and responsible gamblers with uncertain effects and cannot be justified when effective solutions to problem gambling are available.

Periodic shut-down of individual machines

This is an easily defeated harm minimisation measure, when the gambler simply moves to another machine. If it is established that periodic shut-down is a useful harm minimisation measure, this is best achieved by prevention of play of an individual gambler by technologies, which impact on the individual gambler rather than on a machine. These "player pauses" could be mandated and enforced, or requested by gamblers themselves. GSA enables individual gamblers to request voluntary shut downs or "player pauses" and enables gamblers to manage and maintain their own responsible gambling.

Periodic information messages to gamblers using gaming machines

This measure has doubtful efficacy, given problem gamblers whilst gambling, are likely entirely focused on gambling, and such messages are likely at best an annoyance, skipped over and learnt to be ignored.

Performance of Self-Exclusion schemes

The limitations of various methods of self-exclusions are well understood by any objective observer or reviewer, and submissions to the Tribunal will no doubt indicate this.

An effective self-exclusion mechanism must guarantee 100% exclusion of gambling but at the same time allowing use of all other facilities of the gambling venues. Self-exclusion of gambling activity, while allowing the normal use of the other facilities or services of gambling venues, adds to the economic benefit to the industry and to the pleasure of the now non-gambler, but still keeps the individual safe. This can become therapeutic where problem gamblers learn to enjoy leisure activities other than gambling. This is a likely fruitful area of further research in regard to therapeutic possibilities. Effective self-exclusion provides economic, social and personal benefits and is an essential strategy.

Our proposal provides effective self-exclusion in a variety of possible forms. Gamblers can request to be excluded or ask for "blocking" of gambling on all EGMs, particular denomination machines, gambling tables and other gambling forms, or combinations of these. Importantly, gamblers may request self-exclusion on specific days, for instance paydays. Effective self-exclusion measures must be provided in order that gamblers can themselves choose to use prevention measures, which enable them to manage their gambling activities and vulnerabilities. GSA provides effective self-exclusion. Self-exclusion within GSA, enables gamblers to take greater responsibility and be assisted to manage their own gambling behaviour prior to them losing executive control. This facility does allow effective operation of any possible future legislation, resulting in the power to remove the right of certain individuals to gamble.

Information for gamblers

Information for individual players on their gambling session.

Although there is some value in providing information to gamblers on a single gambling session, what is of utmost importance is to connect all gambling activity of individual gamblers over time, thus providing longer term or trend information. The major risk to a gambler is not the nature of their activity on that one occasion, but their "over time gambling behaviour or activities". This activity data

is analysed by the GSA model and identifies "at risk" individuals or those who are already problem gamblers.

Activity statements generated by GSA are made available to individual gamblers, enabling them to monitor their own gambling spend and therefore budget as for any other leisure expenditure. They are then able to determine for themselves if they are gambling responsibly. GSA alerts pre-problem gamblers to the early signs of problematic gambling behaviour prior to addiction, before problem gambling becomes entrenched, and while the individual may still possess executive control. An alerted pre-problem or "at risk" gambler may more readily choose to avail themselves of the further safety net measures of GSA.

The development of an individual's gambling problem can only be identified when the information from individual gambling sessions is connected together. Compared to what GSA does, presenting single session information to a gambler is of limited value.

While individual gambling sessions are not tied to the particular gambler the information that can be validly communicated to the gambler can only relate to that session and be at best general, and is likely to be perceived as not relevant to the gambler. The ability to link all gambling sessions or activities to the particular gambler enables meaningful, timely and authoritative information to be presented to the individual. This information when presented on the screen is more likely to be read and absorbed, as it will be immediately apparent to the individual that the information refers to them. Alternatively, GSA provides for a gambler to obtain a printed form of their gambling history. This more meaningful "communication" is more likely to get through to the gamblers who need to heed the message. GSA has this information and can display it to the gambler.

GSA identifies "at risk" or problem gamblers. GSA has the capacity to direct a trained person to the gambler at the venue or a communication to the gambler's address if provided. Presentation of their gambling history pointing out the problematic aspects, and comparison with a problem gambling profile will have more impact on the uptake of offers of assistance or counselling.

Gambler Subtle Assist links all the gambling activity of individual gamblers and therefore enables targeted, meaningful

communication to specific gamblers, including identified "at risk" and problem gamblers, resulting in effective referral counselling.

Given appropriate protections and safeguards, connecting real time gambling activity information to individual gamblers and connecting information on all gamblers, provides a database of immense potential.

Liquidity controls

Lower limit on maximum bets on gaming machines

Such a measure may have face validity but empirical evidence is needed to establish this as a useful harm minimisation measure. Such a measure takes no account of the ability of responsible gamblers to engage in a chosen activity to the degree they are financially able to afford. Centrally set arbitrary maximum bets, places a greater duty of care on those who set those limits. In assuming that responsibility, there must be a greater certainty that setting these limits does indeed result in the outcome intended. Certainly there is no question that setting a lower maximum bet is a desirable option. We would argue that this decision is best left to the gambler at a "pre –commitment" stage. GSA has the capacity to enable gamblers to pre-set their own maximum bets.

 "Pre-commitment" or "smart" cards that enable financial limits to be set.

The concept of setting limits is an extremely valuable harm minimisation measure. It enables gamblers to maintain responsibility by providing a tool to effectively manage their gambling spend. What is in question is whether "pre-commitment" or "smart" cards are the best technology to adopt to enable financial limits to be set. A further socio-political issue is the appropriateness of legislation to arbitrarily set such limits for all individuals in a society that values and maintains individual freedom of choice and civil liberties. Arbitrary centrally set limits take no account of the ability of responsible gamblers to set their own affordable limits. The generally accepted figure of approximately 98% who are non-problem gamblers, would quite rightly object to a central body

determining how much they can afford to gamble. Gamblers would however, readily embrace a facility enabling them to determine their own limits on gambling spend. This facility alone would enable the vast majority who are responsible gamblers to take further responsibility for their own gambling behaviour and utilize a mechanism, which would assist them to continue to gamble responsibly. Gambling limits can potentially be imposed on a problem gambler as part of their treatment or therapy. The importance of provisions to set financial limits is without question. GSA readily enables "self determined" limits on amount of spend (daily, weekly, monthly, yearly) and gambling duration limits (session, daily, weekly, yearly) into operation. GSA is the ultimate "pre-commitment" card ensuring "the purchase point be removed from the loss of control process inherent in the gambling sequence itself"(Dickerson, 2003) but allowing provision of some gambler choice during that sequence. It is now accepted that limits on gambling spend and even time spent gambling is required. What is available through GSA and will be accepted as essential is the provision of self- determined limits and exclusions on all gambling forms (gaming tables, EGMs, racing, lotto, etc), machine denominations, frequency of gambling and even specific days (eg payday). Given we live in a society where civil liberties are valued and maintained these self-determined or self-nominated limits and exclusions can be specified with or without voluntary overrides. At the time a gambler nominates or requests limits or exclusions, they can also specify whether they wish to be given the option to override that limit once reached during a gambling session. Those who are aware of their own vulnerability in this regard may choose to decline this option at the time of initial request. We as architects of GSA have designed this capability but it remains open to governments that ultimately adopt GSA to specify the features required.

A more extensive discussion on the limitations of "smart" cards is found in Appendix 1 – Limitations of "smart" cards verses GSA card

Dickerson, M, Submission to IPART "Review of gambling harm minimization measures"

Restricted promotion of gambling

Controls on advertising

Advertising of gambling could target two separate sections of the adult population. Two target groups exist, current gamblers and non-gamblers. Targeting non-gamblers does not mean those who then gamble will become problem gamblers at the same rate as the current population of gamblers. It may well be the case that current non-gamblers, who choose to engage in gambling, would remain responsible gamblers and their inclusion to the gambling population may reduce the overall proportion of problem gamblers. Without careful consideration and empirical evidence, certain "harm minimisation" measures, such as controls on advertising, could achieve the opposite of what is intended. Advertising to the already existing gambling population may well increase the rate of responsible gambling and not increase problem gambling. Productivity Commission figures show that for 1997/98, severe problem gamblers had an average EGM spend of \$32,512 per annum. Moderate problem gamblers spent \$6,485 per annum. The remaining gambling population spent an average of \$643 per annum on EGMs. Given problem gamblers already have a high spend, relative to its affordability, their capacity to increase gambling is limited. On the other hand non-problem gamblers have a greater capacity to increase spend on gambling in response to marketing.

Gambling statistics often show an average gambling spend across all gamblers of around \$1100 per annum. Because this includes the enormously high spend rates of problem gamblers, it distorts the real picture of the 98% who are non-problem gamblers who actually spent less than \$650 per annum. Given this lower figure, few would argue that some moderate increase in this spend is inappropriate particularly with the GSA safety net in place. With GSA in place, further advertising would result in increased revenue from non-problem gamblers reducing the industry's and Government's dependence on the revenues that accrue disproportionately from problem gamblers. We are not advocating freeing controls on advertising in the hope that this disproportion reverses. We are advocating putting GSA in place, thus providing the necessary "safety nets" and *ensuring* the disproportion does in fact reverse.

GSA provides the necessary "safety nets" for all gamblers and the ability to identify and assist "at risk" and problem gamblers. Having the protective measures of our GSA in place will ensure that further advertising will result in a shift of the revenue base of industry and Government from problem gamblers to responsible gamblers. This may well lead to a breakthrough in the willingness on the part of industry and Government to adopt such measures, given the loss of revenue from problem gamblers is compensated by an increase from responsible gamblers. Effective solutions to the gambling dilemma, resulting in a shift from revenue dependence on problem to responsible gamblers will ensure an ethical and long-term future for the industry.

Controls on player reward schemes

Again, until the relative effect of reward player schemes is determined, it is not wise to extend this control as such restriction may have a greater effect on responsible as opposed to problem gamblers. This highlights the need for effective evaluation of any existing or proposed harm minimisation measure. Contained in our proposal is the creation of a powerful database where such measures are readily evaluated.

Restrictions on promotions and other inducements to gamble

Once again, it is the relative effect of such inducements on responsible and problem gamblers, which must be determined. Quite possibility, given the already high rate of gambling by problem gamblers, attempts to induce further gambling by this group, will not markedly increase their gambling spend. Inducements to gamble are likely to impact more on responsible gamblers. Shifting industry's and Government's revenue base from problem gamblers to a greater proportion of responsible gamblers must be a key policy strategy in solving the dilemma of problem gambling. Inducements to gamble with the safety net of GSA in place may well assist this strategy.

Community / counselling services

 Requirement for gambling operators to enter into agreement with counselling services.

We support gambling operators and counselling services working together to support problem gamblers. However, it is not appropriate or fair to expect venue personnel to identify "at risk" or problem gamblers based on observation of their behaviour alone. Our proposal enables early validated central identification of all "at risk" and problem gamblers, based on the actual gambling history of the individual and specific demographic data. In order to provide referral counselling to support the identification process, a more central referral process is required.

Training of staff in gaming machine venues

It is not reasonable to expect even trained staff to effectively identify problem gamblers by observation. Trained personnel are required to ensure more effective communication in making initial approaches to problem gamblers who may be contacted at venues.

Technical measures

• Slower reel speeds.

We consider that without empirical evidence to the contrary such technical measures are at best tinkering around the edges. If slower reel speed is established as an important harm minimisation method, GSA will prevent gamblers from playing more than one machine at a time and defeating this measure.

- Removal of visual and sound stimuli
- The impact of music being played and display of lights when a win takes place.

Given the basis for this measure is the assumption that extra stimulation somehow encourages problem gambling, and its reduction will reduce it, there is nothing to prevent gamblers playing more than one machine at a time to obtain extra stimulation. Again, if established as important harm minimisation strategy, GSA will prevent circumvention of this measure. We contend however, that problem gamblers will continue their addiction despite these types of measures and any attempt to reduce the pleasurable aspects of EGM gambling will likely reduce gambling by responsible gamblers and further shift the revenue base towards problem gamblers; the exact opposite to what is required. The direct measures provided by GSA have none of these risks.

2. Response to specific parts of the review

Social Impact Assessment

The Minister has specifically requested investigation of measures for improving the current process in regard to Social Impact Assessments

From, Gaming and Racing A New South Wales Government Department: Information Sheet 6/02

"The following information must be included in a class 1 Social Impact Assessment: Details of the measures that the venue has taken, or proposes to take, to ensure that gambling activities in the venue will be conducted in a responsible manner;"

GSA can provide a direct evaluation of the effectiveness of the particular venue in achieving responsible gaming rather just the description of the measures that have been taken by the venue. This results in a statement of the effectiveness of the measures rather than a description of what may be effective. For Social Impact Assessments, GSA can easily make available the disposable income, and the actual numbers of "at risk" and problem gamblers of those who actually frequent the venue.

Before approving a SIA, the Board must be satisfied that: "the SIA has demonstrated that the activities involving gaming machines in the venue will be conducted in a responsible manner;"

Again GSA provides evaluation data that gamblers are gambling in a responsible manner. This evaluates the effectiveness of the venue in achieving responsible gambling, rather than its attempts to do so.

Measures for accountability associated with funding

Significant public funding is directed to community services to assist with problem gambling. Significant resources are also devoted to developing, considering and putting in place harm minimisation measures, which need proper evaluation. GSA provides a powerful gambling population database, which can be interrogated to readily evaluate the effectiveness of these funded programs and other harm minimisation measures.

If a change in the natural light conditions in venues is considered a useful harm minimization strategy, then change in those light conditions can be readily related to any changes in the actual gambling behaviour of patrons in that venue. The effectiveness of messages on screens, clocks, periodic shut-downs, displays of certain signage, and most harm minimization measures in Table 1, are all readily evaluated against the actual behaviour of patrons in that venue using the GSA database of gambling behaviour. One fails to envisage another more powerful or effective evaluation tool.

o Increasing Turnover

The Issues Report specifically refers to the complexities of turnover in its effect on the rates of problem gambling. It suggests "Problem gamblers by definition have different reactions and motivations to other gamblers, so may react differently to the group as a whole". It postulates that an increase in turnover, combined with more effective harm minimisation could lead to an overall lower amount of problem gambling. Our submissions to the Terms of Reference state the same conclusion. Our analysis, presented more fully in the next section of our submission, is that effective harm minimisation and protective measures coupled with increased turnover will dramatically reduce the overall rate of problem gambling. Our analysis has been presented to Tim Fischer, ex Deputy Prime Minister of Australia and to the Rev Tim Costello and

John Dalziel from the Interchurch Gambling Taskforce of Victoria who support this same conclusion.

Implementation of *Gambler Subtle Assist* will no doubt alleviate negative perceptions of the gambling industry when the community is assured it is a safe and ethical industry. This changed perception may well add to turnover from previously reluctant visitors to gaming venues. Not all new patrons will take up gambling, but they may well be more prepared to use the other facilities and services of gambling venues. This will further shift revenue reliance from problem to non-problem gamblers and from gambling to non-gambling facilities of venues.

Implementation of a system solution such as *Gambler Subtle Assist*, combined with increase in turnover, reduces revenue reliance on problem gamblers and is a major step in solving the gambling dilemma.

3. Our Proposal: Gambler Subtle Assist

The *Gambler Subtle Assist* (GSA) solution and its impact potential on problem gamblers, the community and the gambling industry with particular reference to EGMs and its benefits are outlined in the attached PowerPoint presentation (the file is entitled "EGM GSA General Presentation NSW final REL.ppt"). The presentation contains a small amount of the available information on GSA and represents an Executive Summary view. The trend analysis on the revenue consequences of marketing and addressing problem gamblers is based on data and assumptions, that are available, but not presented in this submission. The statistics and figures are based on the Productivity Commission Report into gambling and are presented from an Australia-wide perspective; the analysis does however generalise to NSW.

Final Comment:

Given the self evident validity of the harm minimisation and prevention measures in *Gambler Subtle Assist*, and, that it is available to be implemented within an acceptable cost structure and time frame, *Gambler Subtle Assist* warrants serious consideration by the Gaming and Racing Tribunal, and Government, in order to discharge its duty of care to the gambling public of New South Wales.

Irrespective of the interim harm minimisation measures attempted to control problem gambling, ultimately, the socially responsible avoidance of harm associated with gambling will require a safety net, Gambler Subtle Assist. A ponderable question is, why expend large amounts of effort and money on measures that tinker with the problem when the ultimate remedy is available, does not infringe civil liberties and cost of implementation is probably less than some of the interim measures.

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4. Appendix 1

Limitations of "smart" cards verses GSA card

Some of the reasons and issues relating to smart card use compared to the GSA card can be summarised as follows:

- 1) Smart cards are unlikely to collect the gambling history information referable to a unique card number. Rather the information available is more likely to relate to a specific transaction number. This clearly makes tracing the actual user difficult and the proactive directed counselling ability of the GSA card does not apply unless there is a unique card number upon which the model can act.
- "Smart" cards have an actual monetary value, the amount with which they have been loaded. This creates a "trade" in cards risk. A problem gambler could simply get someone else to obtain or load a card for them. Others will simply obtain cards and sell them to those that want them. This is a particular risk if the gambling history of a unique card number is not available at a central point for modelling by GSA. If the information is available centrally and associated with a unique card number, this is then in fact GSA, and if it is GSA, why use a "smart" card with its attendant money related risk issues, additional cost and user inconvenience?
- 3) "Smart" cards without a centralised history link associated with the card cannot provide proactive directed counselling.
- 4) "Smart" cards cannot provide an effective "self-exclusion" to gambling activities.
- 5) Without a central link a "smart" card scenario cannot provide information for detection of problem gamblers associated with frequency, duration and acceleration of gambling.
- With a "smart" card, no authorisation process is required so no monitoring is possible and problem gamblers are able to simply by-pass the checks and balances at will.
- 7) A historical record of gambling activities is not compulsorily obtained with a "smart" card.
- 8) A "smart" card system is based upon the monetary value loaded to the card, whether this is arbitrary or government limited, and

not to the individual's disposable income - so no check or balance.

- 9) With centralised data recording a "smart" card based system is simply a more expensive and riskier to the holder (due to cash on card) version of GSA. So why incorporate the "riskier" areas involved in a "smart" card when they are not necessary to the harm minimisation and prevention measures of GSA?
- "Smart" cards require specialised loading or replenishment areas whereas the GSA entry card does not. Where are these recharge places to be located and how is it to be determined who can and who cannot re-load the card? What checks would be put in place unless GSA has been implemented?
- 11) With a "smart" card approach what is to stop a problem gambler from loading multiple cards to get around 10 above? This is not possible when there is a centralised reporting system such as GSA.
- 12) If a gambler loses the "smart" card they have lost money why introduce this risk when with GSA there is no money associated with the card and a lost card means nothing; it is simply blocked and the gambler gets another with the preservation of their gambling history.
- A "smart" card loaded with money, which is "tradeable", would create increased risk of criminal activities associated with the smart card and gamblers and venues for what advantage?
- 14) If a person has loaded a "smart" card with money and then wants to redeem the money how is this to be achieved? This would create organisation and infrastructure challenges greater than those imposed by GSA.
- "Smart" cards represent no more than a potential frustration to problem gamblers, a delay in the process and they will spend longer at the EGM. It does not follow that if it takes them longer they will lose less. Without a central link a "smart" card cannot provide the psychological modelling of GSA nor provide the directed proactive counselling provision. A central link "smart" card is a more expensive implementation of GSA with the additional expense but few of the GSA features.
- The inconvenience of re-charging, delays and so on associated with smartcard use, will affect all gamblers and not just the problem gamblers. The only inconvenience GSA imposes is the need to get a card. GSA is far friendlier and less intrusive to the

98% of gamblers who do not and never will, it is claimed, become problem gamblers.

- 17) With GSA the "intelligence" and control mechanisms reside centrally in a single place, making it readily, easily and cheaply adaptable to changing health, socio-political or community needs. Fundamentally, with the GSA card the user needs to do nothing when services or functions are changed. However, with a smartcard most, if not all, the control mechanisms are written to and controlled by the actual card itself. Consequently, functionality changes required because of varying health or community needs, require a whole infrastructure change and the user to actually do something to bring this into effect. Changes to function with a smartcard may very well require the re-issue of the smart cards to the user with the attendant costs and time it takes to achieve impacting on the ability to make changes to the harm minimisation measure quickly and efficiently. The GSA approach has none of these attendant pitfalls and is perhaps the ultimately flexible, quickest to react and cheapest harm reduction method.
- With GSA card and implementation, the gambler can allocate from the same profile associated with the card, which loyalty program or programs are to receive the gamblers information, if at all. Providing the gambler approves, GSA provides the means by which information on their gambling activity can be provided to venue or organisation specific loyalty schemes without the need to hold specific loyalty cards. Smartcards without a central link are not able to provide this functionality seamlessly.

In summary, "smart" cards are a "tinkering" about the edges. On the other hand GSA, puts into the hands of the individual, the community, the government and the industry (less so) the ability to positively and definitively influence the behaviour of a gambler, provide a safety net, comply with the relevant "duty of care" issues, does not constitute an increased risk to the patron, preserving their civil liberties whilst collecting information which can be anonymous and still direct counselling support to the individual whilst in the act of gambling. The information collected identifies "at risk" and problem gamblers from the total gambling population. GSA facilitates individual accountability but provides the community and others with the means by which to address those who are not accepting that accountability, if this is desired.





GAMBLER SUBTLE ASSIST

The "turn key" solution to the Gambling Dilemma facing Government and the Gambling Industry

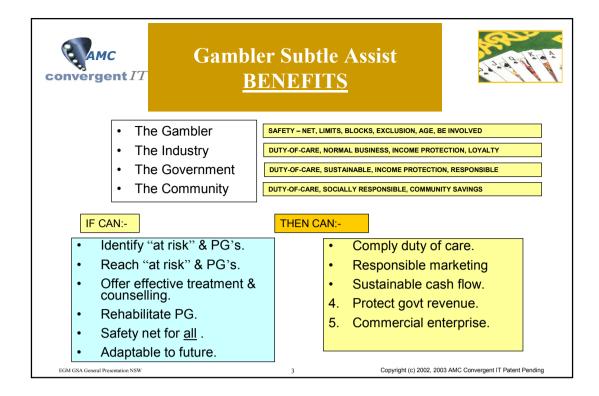


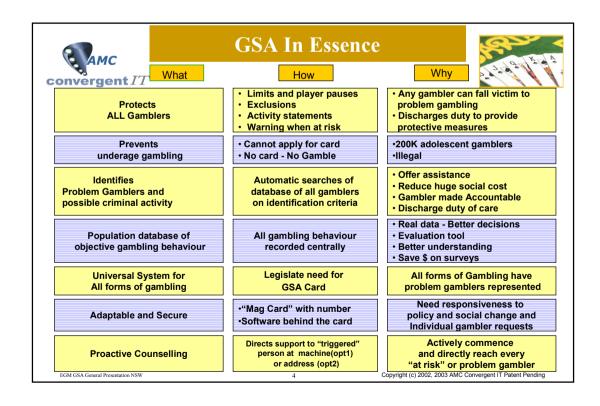
CURRENT APPROACHES PROBLEMATIC



- The only means by which problem gamblers receive assistance is to refer themselves, meaning only small numbers of those who need help seek it. Too few too late. Large number of "at risk" gamblers not addressed.
- Large pool of currently non problem gamblers left without effective protective measures to assist them to remain responsible gamblers.
- Massive cost of problem remains largely unaddressed.
- No objective statistics on gambling available.
- Lack of objective data means Government and the gambling Industry has no defence to media and anti gambling groups. Government is sometimes forced to act <u>blindly & reactively.</u>

EGM GSA General Presentation NSW







GAMBLER SUBTLE ASSIST





Gambler Subtle Assist

- Provides <u>early</u> identification of "at risk", problem gamblers and those likely to engage in or are engaged in criminal behaviour to fund their gambling activity; for <u>proactive</u> and <u>preventative</u> counselling service.
- · Prevents underage gambling
- Provides mechanism to all gamblers to assist them to remain responsible gamblers and avoid entering into problematic behaviour.
- Provides a safety mechanism or insurance for all gamblers ("safety-net").
- Provides an accurate and objective gambling database; population parameters NOT sample statistics to Government, industry and gambling researchers.
- Enables significant efficiencies for industry and gambling regulation monitoring.

EGM GSA General Presentation NSV

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GAMBLER SUBTLE ASSIST





Gambler Subtle Assist

- Is socially responsible (Rev T. Costello Interchurch Gambling Taskforce Vic, J Dalziel – Salvation Army Aust and Tim Fischer former Deputy Prime Minister of Australia support GSA).
- · Protects civil liberties (Brian Walters Liberty Victoria)
- Upholds the rights of the individual to participate in a legal activity.
- · Ensures the individual's right to choose.
- Makes the individual responsible and accountable <u>but</u> provides mechanisms to assist them ("safety-net").
- Enables government and society to avoid the high social cost of gambling and makes revenue for government and industry <u>sustainable</u>.
- Targets limited resources effectively and places them into direct contact with the afflicted individual quickly.
- Effectively discharges government, community and industry responsibility and duty of care.
- Is "Self learning", multi-factored and provides enhanced early identification.
- · Is a "turn-key" "end to end" solution .

EGM GSA General Presentation NSW



BENEFITS - OVERVIEW GAMBLERS



- · Self insurance
 - Safety net for all gamblers
 - Early warning for "at risk", "problem gambling" and criminal activity
 - Enables early treatment and financial counselling
 - Always there 24/7 not dependent on an individual's response.
 - Anyone can become "problem gambler"; a gambler funded system can be considered a low cost self insurance premium
- Gambling gives pleasure to many people and *Gambler Subtle Assist* (the safety-net) maintains that pleasure.
- Access to assistance is not dependant on failed "self referral" or answering questionnaires truthfully.
- Caters for infrequent gamblers, international, interstate and high rollers (Australia wide capable).
- Ease of application and minimal consumer impact or intrusion.
- · Objective individual data valued by Courts.

EGM GSA General Presentation NSV

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GSA Enables Gambler Responsibility



- Delivers the technological solution to providing a complete record of gambling to individual gamblers, enabling the individual to take responsibility for monitoring their own gambling activities.
- Enables individuals to manage their gambling activity by providing an
 effective "pre-commitment" system to self-impose limits, with or without
 voluntary overrides to their gambling spend, time spent gambling,
 frequency of gambling. GSA allows blocks to gambling totally, gambling
 mode(EGM's, tables, lotto, Tab, etc), specific gaming machines and specific
 days(eg payday).
- Enables individuals to self-impose their own voluntary shut-downs or "player pauses"

EGM GSA General Presentation NSW



BENEFITS – OVERVIEW INDUSTRY



- Stops unreasonable restrictions to commercial activities and business, by removing the subjective pressure, currently applied to government, the community and industry by newspapers and pressure groups.
- Ensures a sustainable industry.
- Improves the public image of the gambling industry and Government.
- Minimal cost
- · Minimal intrusion to gambling venues and the public.
- Venue costs and business model become known
- Fits into current cost to industry profile
- Cost reduction or containment (for industry)

EGM GSA General Presentation NSW

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BENEFITS – OVERVIEW GOVERNMENT



- Kudos
 - Domestic and international.
 - Positive change in public perception of Government- depoliticizes gambling.
- Prevents need for unreasonable or "knee jerk" restrictions on the gambling industry and gambling public.
- Enables Government, industry & community to fully discharge their "duty of care"
- Protects and assists revenue growth without the need to respond to the daily criticism from media and anti-gambling groups. Government revenue becomes sustainable and no longer a political or community issue when the public is confident the social cost of problem gambling has been addressed.

EGM GSA General Presentation NSW

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BENEFITS - OVERVIEW GOVERNMENT



- Massive reduction of the social cost of problem gambling (by \$0.5 to \$1.6 billion, Australia wide).
- · Minimal cost maximal benefit
- Stops a serious problem severely affecting the community getting worse, with no current effective solution, and preventing the real threat to the future of the gambling industry by bringing PG under control.
- Provides objective data enabling objective decisions.
- Extendable to all forms of institutionalised gambling including internet, horse and greyhound racing, tattslotto, etc.
- Means to evaluate the effectiveness of gambling support programmes & counselling funded by the Community Support Fund.
- · Can monitor "payback" ratios.
- · Can monitor total gambling revenue.
- · Can incorporate gambler loyalty schemes to recover costs.

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THE PROPOSAL OVERVIEW



- · Centralized "ON-LINE" authorization using a single card
- · Card is a "magnetic card" containing only a number
- Readily, easily and inexpensively altered or enhanced to meet changing needs or requirements changes are central no card impacts.
- "NO CARD NO GAMBLE"
- · Accurate identification having an established psychological basis.
- Early identification of & access to treatment intervention for "at risk" and "problem gamblers"
- · Protects all gamblers and prevents underage gambling
- Powerful self learning, centralized database of gamblers activities, enables further continuous refinement of the identification model and discoveries about the nature of gambling and problem gamblers
- OBJECTIVE gambler population parameters not statistical guesses
- USER PAYS NOT COMMUNITY.
- Minimal impact on industry, government and gamblers to implement.
- · Minimal cost- Maximum benefit.
- Provides a "cross the industry" loyalty facilitation, if desired, providing industry and GSA efficiencies
 and avoiding the need for gamblers to carry more than one card.

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Technological and Information Architecture & example Portal screens

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Gambler Subtle Assist "What Technically is it?"



- Internet portal
- Server
- Tcp/ip network
- · Search engine
- · Referral engine
- Referral reporter

Comprising:

- BROKER
- UPDATER
- RESOLVER
- APPLICATION/RENEWAL
- REPORTER
- MODELLER
- REFERER
- SEARCHER

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Gambler Subtle Assist



Considerable systems design and software development has occurred and written.

The *Gambler Subtle Assist* portal internet based applications have been substantially developed (85% completed).

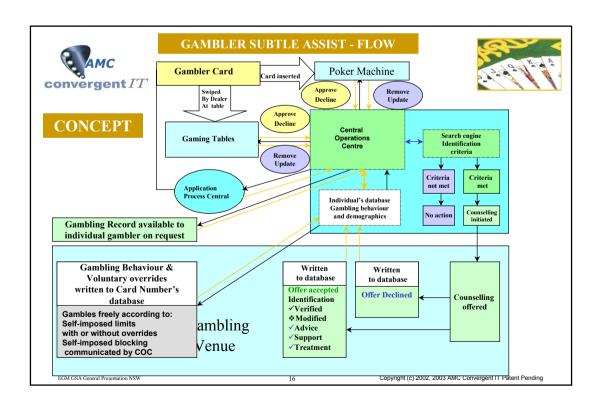
The following pages shows some screen images of the Gambler Subtle Assist safety net application.

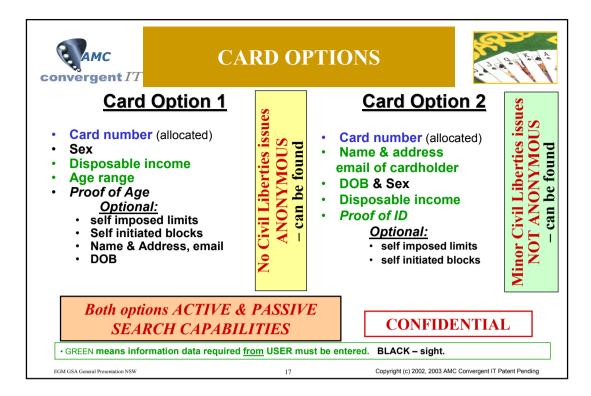
It is not all presented here.

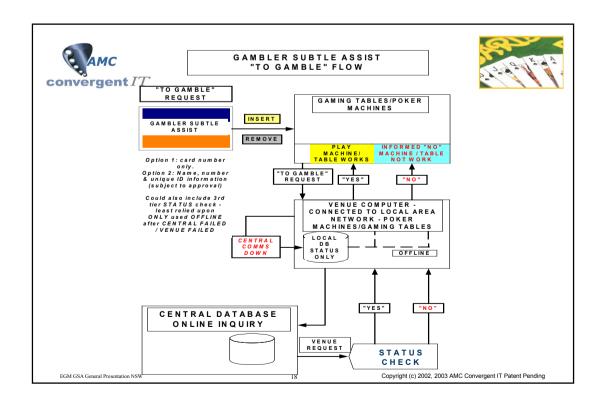
Gambler Subtle Assist's development is at such an advanced stage it can be in operation providing the gambler and community safety net within 12 months.

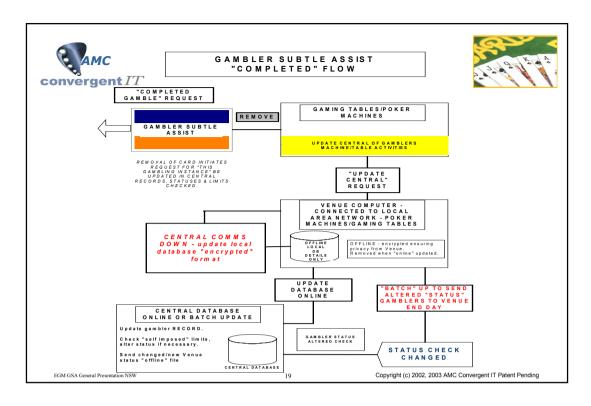
Most of this time allows for venue implementation matters.

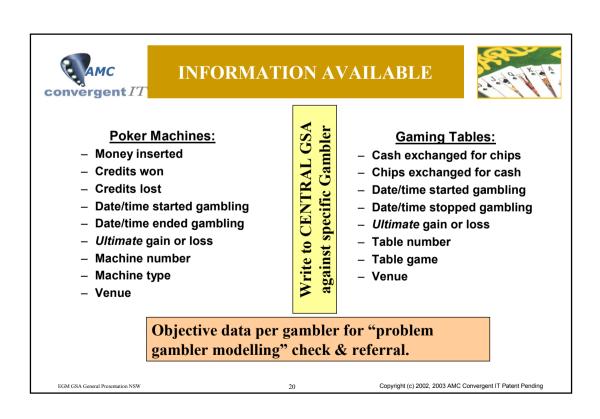
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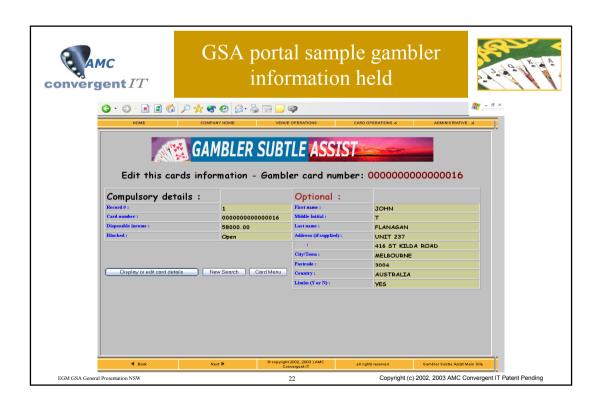


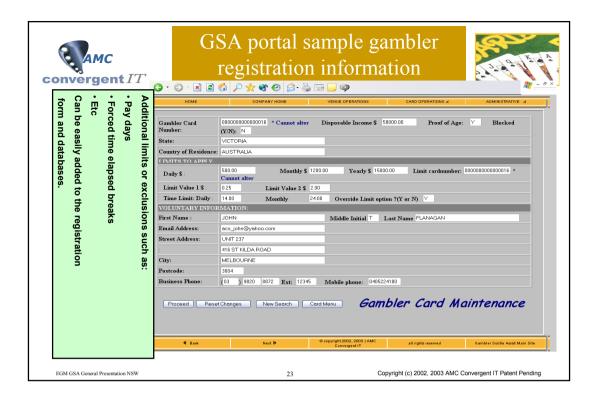


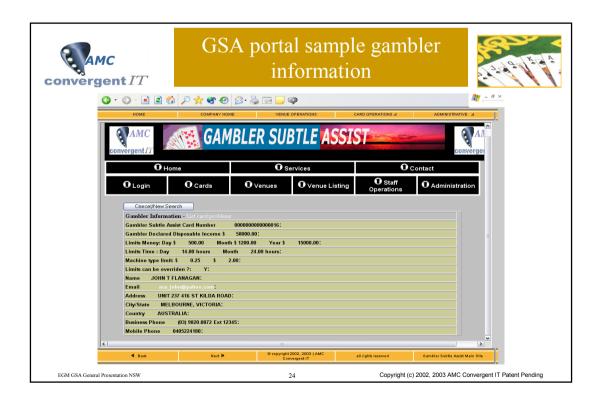




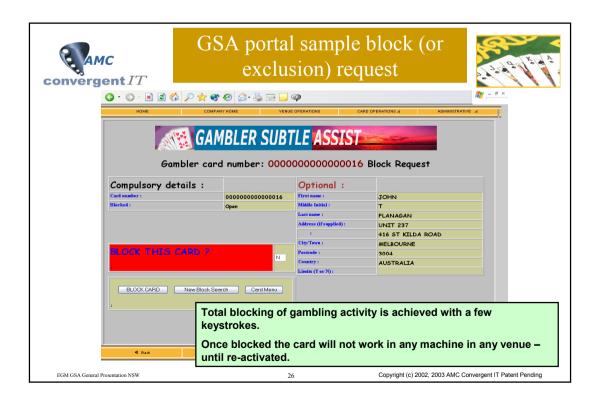


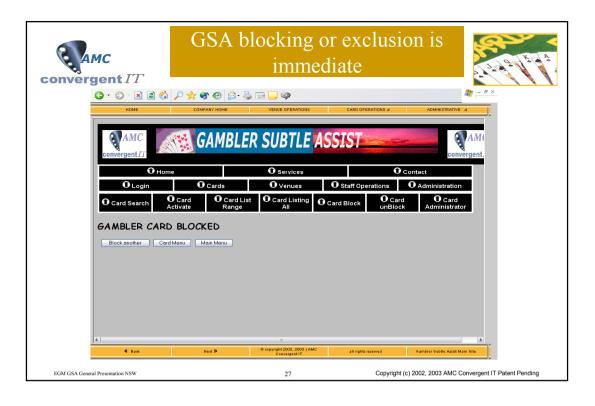


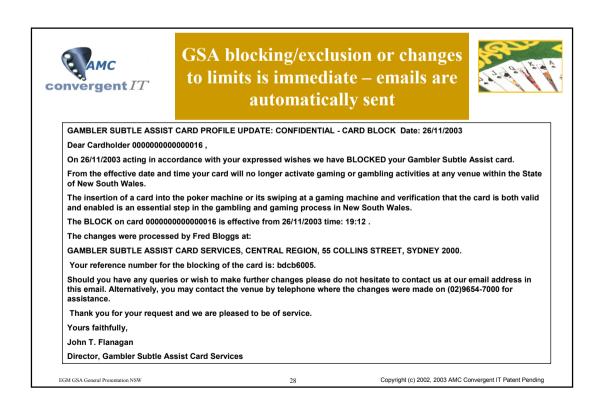




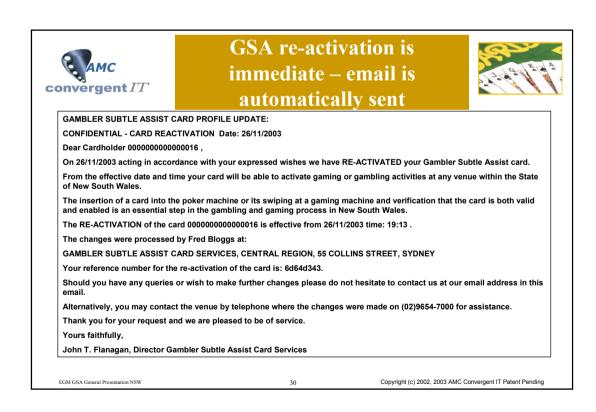


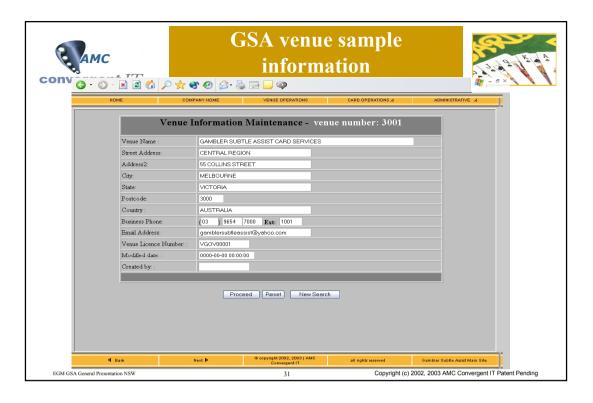


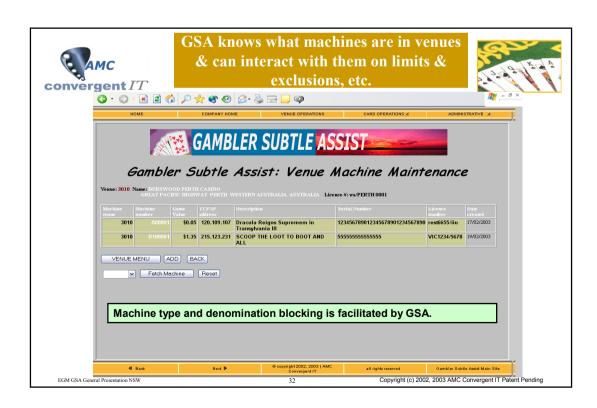


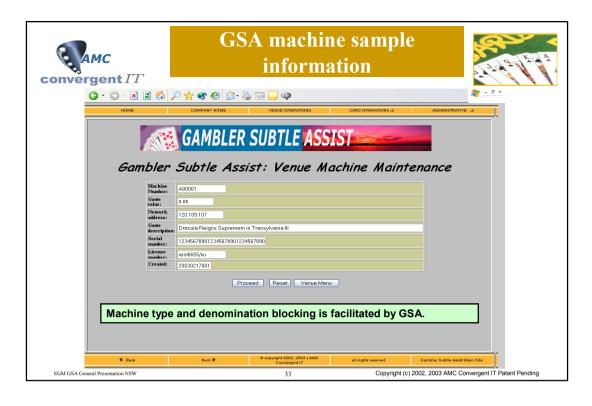
















Adaptability



- Card is a "mag card" containing only a number. This provides security and adaptability as all the technological architecture is behind the card
- Readily, easily and inexpensively altered or enhanced to meet changing needs
 requirements central change no card impacts.
- Voluntary "self-imposed" limit monitoring with voluntary "overrides." These are actioned and altered centrally and not through card.
- Voluntary card "BLOCKING" & effective self exclusion. These are also actioned and altered centrally.
- Responsive to changes in Government policy or legislation. Changes are made centrally without the need for card recalls, as in SMARTCARD scenarios.
- Powerful self learning database enables continuous refinement of the identification model and discoveries about the nature of gambling and problem gamblers.

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Psychological Basis for Identification

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Gambler Subtle Assist



Provides an Effective Identification Process

Applied to the Entire Gambling Population

Leading to support and treatment of "at risk" and problem gamblers and enabling all gamblers to be responsible and accountable

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Our Model <u>Harm – Treatment</u> Focus



- · Depression
- · Suicide
- · Domestic Stress

Spousal

Child

Relations

Friends

- · Productivity, work and study
- · Loss of Self Esteem
- Financial Stress
- Loss of Control
- Criminal Behaviour

Theft Fraud

GSA focus is to

- · Identify all at risk gamblers
- Identify all gamblers who are experiencing actual harm
- Facilitate access to treatment
- Enable all gamblers to be responsible and accountable

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Search Engine



- Based on the current psychological research
- Automatic searches based on defined criteria, readily and easily refined
- Self Learning
- · Non intrusive to gamblers
- Minimal information requested from gamblers

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DSM-1V and SOGS basis of Gambler Subtle Assist Identification



DSM-1V, the Diagnostic Statistical Manual of Mental Disorders, edition 4 is the internationally recognized standard diagnostic tool used by psychiatrists for diagnosis

SOGS, the South Oaks Gambling Screen is also internationally recognised and available to non psychiatrists to screen for problem gambling

DSM-1V, SOGS and other measures

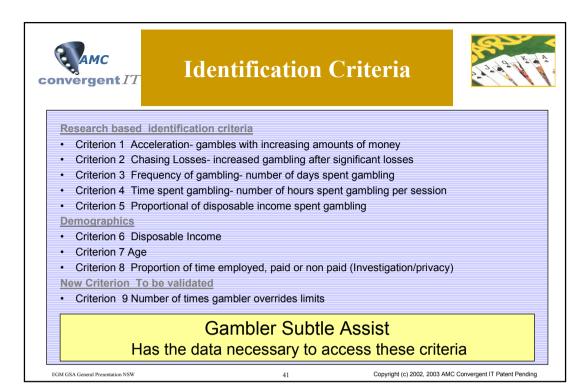
- · are self report measures where the client is simply asked a series of questions
- · Impossible to evaluate the truth or accuracy of their answers

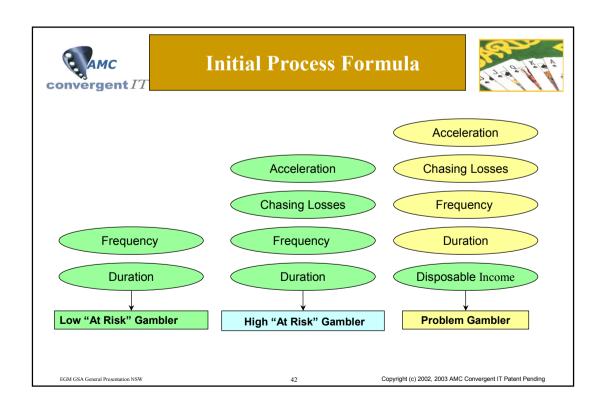
GSA Model

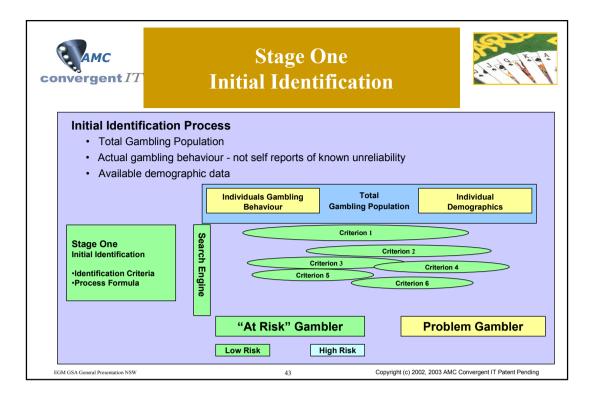
- · Uses several of the DSM-1V and SOGS criteria
- BUT uses actual gambling behaviour as base data and is not affected by the truthfulness, accuracy or memory of the gambler
- · GSA has a perfect memory of gambler behaviour.
- The Model is based on statistical modelling and current psychological understanding, and is applied faithfully to every individual
- GSA is dynamic and will continue to provide enhanced solutions

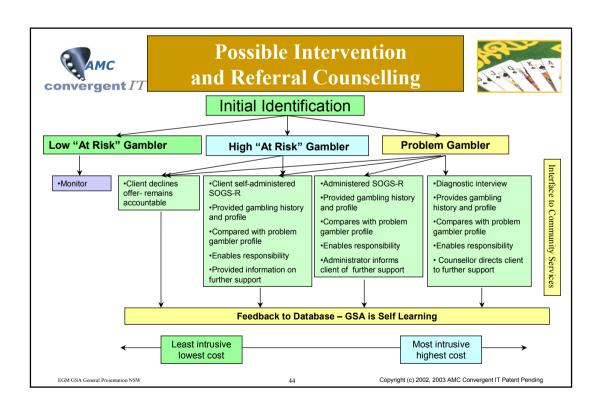
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Effective Identification and Intervention Process



Effective Means

- Objective & Adaptable
- Self validating
- Enables gambler responsibility
- All gamblers screened
- Timely
- Targeted
- Cost effective
- 24/7
- Applicable to <u>all</u> gambling; wagering and gaming

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Timely



- Early identification
- · Initial Identification made immediately criteria are triggered
- · Initial Identification not dependant on availability of counsellors
 - <u>Card Option 1</u> Intervention immediate. Within minutes or hours, or if unsuccessful in the first instance, most likely at the next gambling session even if at another venue
 - <u>Card Option 2</u> Initial approach and offer of assistance by post. If unsuccessful revert to active approach as in Card Option 1

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Targeted



- Identification dedicated to searching for individuals who are "at risk" of developing, or who already have gambling problems (can be graduated response, e.g. severe PG) – safety-net
- Identified individuals become responsible and accountable
- 92-97% of gamblers never affected by GSA (Productivity Comm.)
- Stage 2 assessment and support offered to all "at risk" or problem gamblers
- · Tailored to the nature and extent of the gambling problem
- Does not depend on widespread, expensive and often ineffectual, education campaigns to gain access to or educate the few

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Cost Effective



- Scarce resource dollars can be allocated on the basis of greatest need or harm.
- Resources allocated to motivated and responsible clients who accept assistance.
- All gamblers with problems are reached
- · Not a shot gun approach

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- Identification (authorisation/modelling/tracing) process does not sleep or take a break. It is always on the job
- A mantle of "safety" sits in the background like smoke detectors that come on only to warn, and electric surge protectors only to protect
- Non intrusive full time service that lets us go about our lives with confidence knowing we are protected.

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Traditional Approaches Failing



- · Don't identify "at risk" or all problem gamblers
- Self report assessment tools suffer a major flaw. Only 28.9% of problem gamblers answer assessment or screening tests *honestly*.(*Prod.Comm.*)
- · Few seek help usually too late
- A reported 11,900 problem gamblers and others affected sought help from the estimated 300,000 with a problem (*Prod.Comm.*).
- 5 to 10 others are directly affected by each problem gambler (*Prod.Comm.*), leaving many hundreds of thousands without support and suffering the costs of problem gambling.

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Traditional Approaches Fail Few Seek Help



Access to treatment and support for problem gamblers often depends on:

- · Persuasion by families
- Extreme circumstances forcing the problem gambler to act
 - Financial crisis
 - · Hospital admission
 - · Family break up
 - · Legal proceedings
 - · Orders by the courts
- A known problem is many ethnic peoples do not access counselling or referring themselves for treatment or support

GSA is an active monitoring sentinel safety-net service for all of the gambling public, their dependents and community

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Gambler Subtle Assist Works



Identifies and delivers support to all those that need it:

 Identifies at risk and problem gamblers using demographic and actual gambling behaviour

Self report assessment tools suffer a major flaw. Only 28.9% of Problem gamblers answer assessment or screening tests honestly. (*Prod. Comm.*)

Not dependant on failed self referral

Less that half of those who want help actually seek it (Prod.Comm.). A direct approach to these gamblers is likely to be successful.

Direct intervention offered to all at risk or problem gamblers

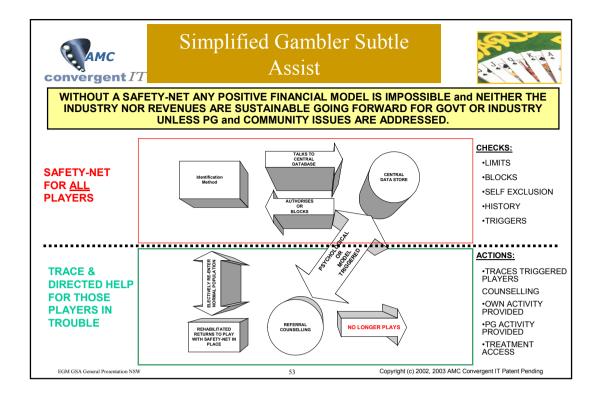
Direct offers of assistance more effectively promote the availability of support & treatment options than non-targeted general advertising or education campaigns.

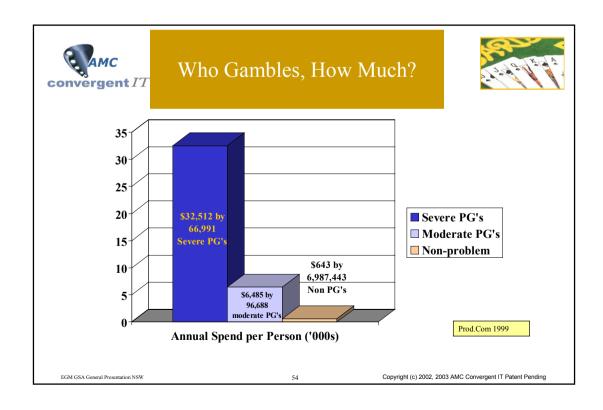
Direct proactive intervention to those with gambling problems, works
 Studies show that problem gamblers do respond positively to intervention.
 (Coman et al, Jackson et al).

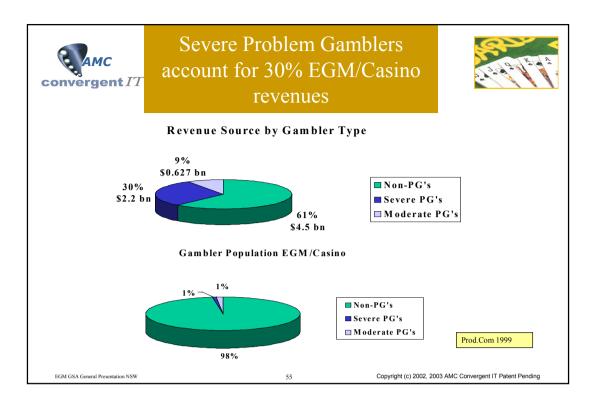
Traditional notions of the intractable nature of problem gambling in individuals are being challenged indicating that problem gambling can be effectively treated. (Abbott,M.)

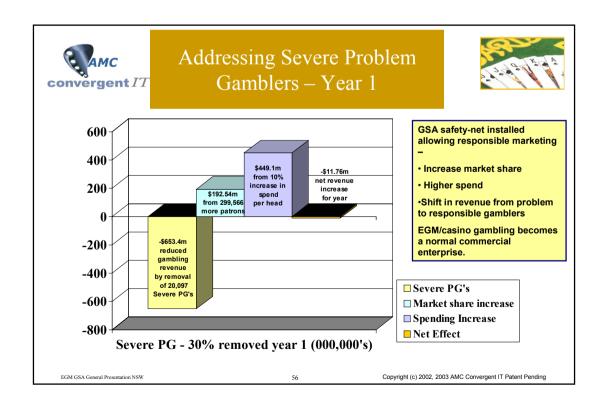
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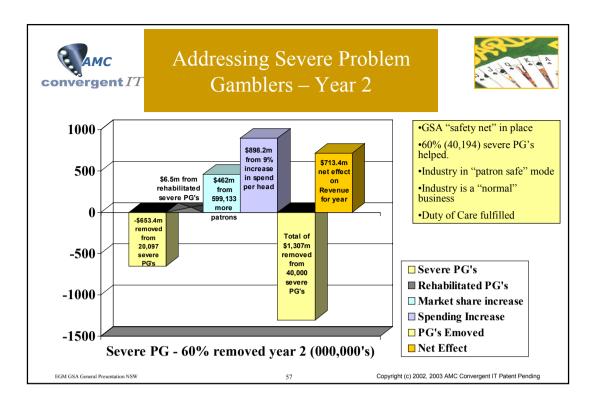
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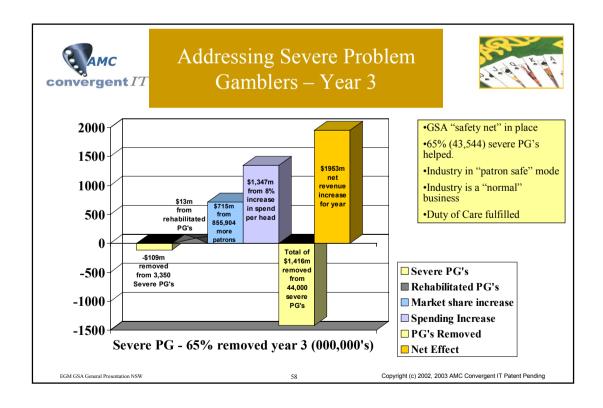


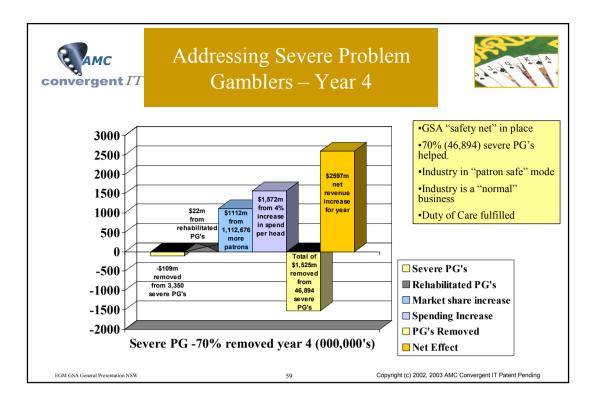


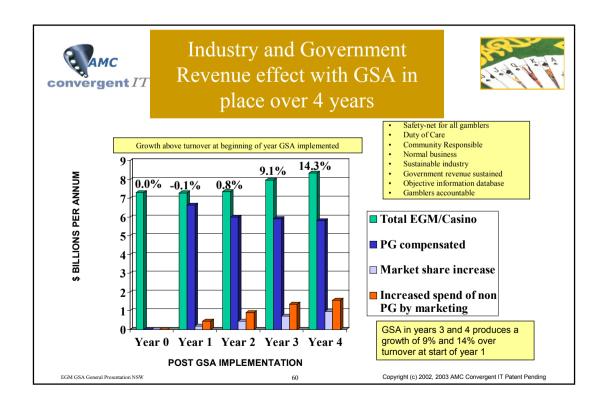


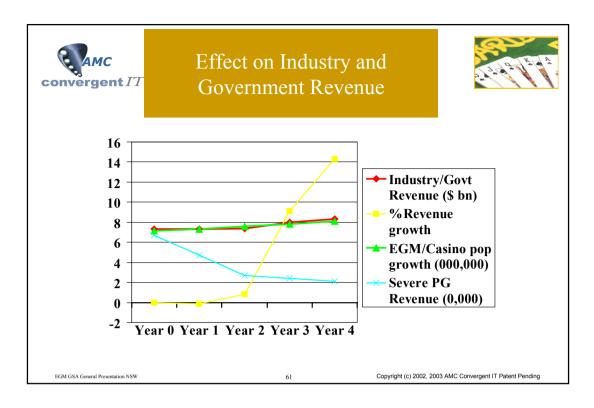


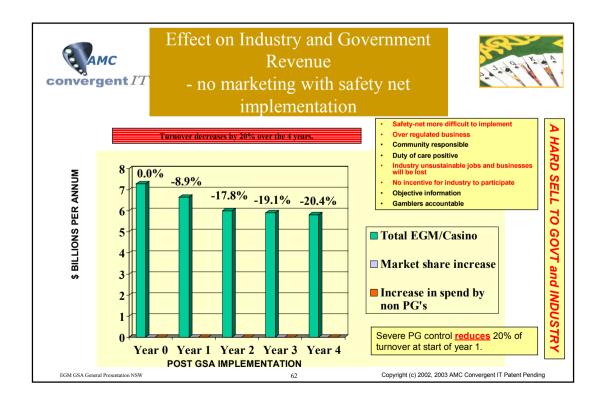














Graduated Response



- GSA, the safety-net, enables an industry, community and government graduated response to a legal activity that has reached a crisis point
- Less than 1% of EGM/casino gamblers are responsible for 30% of the industry's revenue.
- Sustainability of this revenue is only possible with GSA implementation the safety net.
- Duty of Care legal requirements complied with.
- User pays and other funding options available.

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AMC Convergent IT



- Australian and international (SE Asia, NZ, Europe, UK, Africa) experience.
- Projects include:
 - software (point of service, retail and automated retail integrated into Airport Operations Centre systems) systems for Kuala Lumpur International Airport.
 - Operational readiness and transfer for Harare International Airport terminal building services, passenger services, airline services and <u>all</u> systems specification, commissioning and handing over.
 - Development and implementation 360 store systems (RSA)
 - Development, implementation, integration wholesale / retail supermarket systems in Kuwait.
 - Implementation, installation and support of Mobil EFTPOS throughout Australia.
 - Development of web based retail butcher (some 2,000) data harvesting connected to web portal for Australia wide use for Meat and Livestock Australia. Includes system design and architecture, POS, middleware, data harvesting, SQL queries and central system modules with OLTP and OLAP environments.
- Problem solving practical interface between technology and society for real benefit at right cost.

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AMC Convergent IT



- Experienced in large scale social impact projects.
- Brings wide industry experience to solve industry problems.
- Provides solutions that work, non-parochial.
- Partners organizations and is accountable
- Provide complete solutions to problems **NOT** just a technology provider.
- Capable of providing and operating Gambler Subtle Assist in all aspects.

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AMC Convergent IT John Flanagan



- Theoretical nuclear physicist and mathematician.
- · Veterinary surgeon.
- Software developer.
- Developed Australian company and took it overseas.
- Over 20 years experience in wide area networking and meeting client needs.
- Experience as Chief Executive Officer of Public Company.
- Graduate of Melbourne University.
- Experience in large scale social impact projects and technology.
- System and Process Analyst.
- Strategic planner and future directions problem solver.
- Adopts a holistic approach to problems when developing solutions.
- Concept creator of intellectual property of Gambler Subtle Assist.

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AMC Convergent IT John Szymanski



- Registered Psychologist, B.Psych., Dip Ed., Univ of Western Australia
- Mathematics and Economics Teacher; 3 years as a Psychology Tutor at the University of Western Australia
- 24 years experience using a wide variety of psychological approaches in understanding and dealing with human behaviour
- 24 years experience providing problem solving, strategy development and implementation on an individual, group, organizational and system wide basis.
- Key designer of computer based student performance, identification, profiling and monitoring system in a government school setting; sold commercially
- Sound understanding of current legal and duty of care issues

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Contacting AMC Convergent IT



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B.Sc., B.V.Sc(hons) B. Psych, Dip.Ed.

All documentation relating to Gambler Subtle Assist (patent pending) including concepts, mode of operation & benefits is copyright © 2002, 2003 AMC Convergent IT world-wide all rights are reserved. Patent Pending

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Gambling is a legal activity & business, the issues with "problem gambling" revolve around its <u>early</u> identification & the availability of assistance, coupled with mechanisms enabling individual responsibility & accountability – "user pays". Gambler Subtle Assist REPAYS all participants and is the <u>safety net</u> solution to a potential community crisis.

AMC Convergent IT expresses its appreciation for your attention to our submission.

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