2018 Churchill Fellowship

Modernising harm prevention for gambling in Australia: International lessons for public health policy and improved regulation of gambling

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Report by Dr Angela Rintoul, Churchill Fellow
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Signed: 

Date: 19 August 2019

Disclosures

Travel costs for this study were granted through the Winston Churchill Memorial Trust. Most of my time on this study was conducted whilst on unpaid leave from my employer, the Australian Institute of Family Studies, who provided four weeks paid leave. I hold the position of Adjunct Senior Lecturer at the Monash University School of Public Health and Preventive Medicine. I adhere to the Auckland Code of Ethics for Gambling Research and do not accept funding from the gambling or other addictive industries.
Acknowledgements

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- the Winston Churchill Memorial Trust (WCMT) for recognising the strategic importance of this topic and investing in me to undertake this work.
- the participants who took the time to meet with me and share their knowledge and experiences.
- Professors Rebecca Cassidy, Gerda Reith, Ingeborg Rossow, and Drs Jenny Cisernos, Janne Nikkinen and Vladimir Poznyak, and Mr Jonny Engebø who provided support by recommending contacts and arranging seminars in their respective countries.
- My partner, Charles, who not only assumed primary carer responsibilities for our son throughout this trip, but as a fellow gambling expert, was also a valuable discussant regarding study design and analysis.
- Our son, Rex, who endured a somewhat gruelling travel schedule (for a baby) with good humour and a sense of curiosity.
- My parents for their enthusiasm about this award and their childcare support.
Abstract

Australia leads the world in per capita gambling losses. Harms experienced by gambling are substantial and can be severe. I undertook a Churchill Fellowship to investigate international lessons for public health policy and improved gambling regulation. The aim was to understand measures that had been introduced in other jurisdictions to prevent and reduce gambling-related harm, as well as factors that enabled the introduction of these measures. The study involved key informant interviews with gambling regulators, consumer advocates and affected others, politicians, academics and operators, in eleven cities across seven countries (France, England, Scotland, Norway, Sweden, Finland, Switzerland). I discussed ways to develop global responses to the public health challenge of gambling with UNESCO (Paris) and WHO (Geneva). I also provided presentations outlining recent research from Australia to audiences in four countries.

This report provides a summary of key public health lessons that could be considered to improve gambling regulation in Australia. Additional findings will be detailed in a future peer reviewed manuscript.

Key lessons include:

- The critical value of registered gambling (aka ‘universal identification’) for the successful deployment of population level harm prevention measures.
- The need for effective use of the media to facilitate public discussion of the nature and magnitude of gambling-related harm;
- The value in harnessing political interest in reform from across the political spectrum, perhaps by establishing a parliamentary group or groups on gambling (noting Australia’s Federal system);
- Improving resources and powers for regulators to effectively monitor and respond to predatory gambling practices;
- Establishing a national gambling strategy and national gambling reporting system;
- The potential importance of deploying more sophisticated disruption strategies to protect consumers from unlicensed online gambling providers;
- Establishing and resourcing a national regulator to oversee reformed and nationally consistent regulatory measures, and to ensure fair gambling rules, including for those gamblers who experience relative success in wagering or other gambling modes.
• Establishing a system that avoids dependence on gambling revenue, particularly avoiding direct funding of treatment, research and other ‘good causes’, and which reduces dependence by states on gambling revenues;
• Excluding the influence of the gambling industry from policy development and research.

A number of recommendations have been provided that might be considered in the Australian context.

**Keywords:** electronic gambling machines, online gambling, regulation, harm reduction, public health policy.

**Contact details:** Dr Angela Rintoul (DrPH, VPHTS, MSocSci, BA), Research Fellow, Australian Gambling Research Centre, Australian Institute of Family Studies & Adjunct Senior Lecturer, Monash University [angela.rintoul@monash.edu](mailto:angela.rintoul@monash.edu)
**Acronyms**

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACMA</td>
<td>Australian Communications and Media Authority</td>
</tr>
<tr>
<td>APPG</td>
<td>All-Party Parliamentary Group (Britain)</td>
</tr>
<tr>
<td>ACT</td>
<td>Australian Capital Territory</td>
</tr>
<tr>
<td>DNS</td>
<td>Domain Name System</td>
</tr>
<tr>
<td>DALY</td>
<td>Disability Adjusted Life Year</td>
</tr>
<tr>
<td>DSM-V</td>
<td>Diagnostic Statistical Manual – version 5</td>
</tr>
<tr>
<td>EGM</td>
<td>Electronic gambling machine</td>
</tr>
<tr>
<td>EUCJ</td>
<td>European Court of Justice</td>
</tr>
<tr>
<td>FOBT</td>
<td>Fixed Odds Betting Terminal</td>
</tr>
<tr>
<td>GGR</td>
<td>Gross Gambling Revenue</td>
</tr>
<tr>
<td>ICD 11</td>
<td>International Classification of Disease – version 11</td>
</tr>
<tr>
<td>IVT</td>
<td>Interactive Video Terminal</td>
</tr>
<tr>
<td>NGA</td>
<td>Norwegian Gaming Authority</td>
</tr>
<tr>
<td>NSW</td>
<td>New South Wales</td>
</tr>
<tr>
<td>NT</td>
<td>Northern Territory</td>
</tr>
<tr>
<td>PGSI</td>
<td>Problem Gambling Severity Index</td>
</tr>
<tr>
<td>QLD</td>
<td>Queensland</td>
</tr>
<tr>
<td>SGA</td>
<td>Swedish Gambling Authority</td>
</tr>
<tr>
<td>SoRAD</td>
<td>Social Research on Alcohol and Drugs</td>
</tr>
<tr>
<td>VLT</td>
<td>Video Lottery Terminal</td>
</tr>
<tr>
<td>UNESCO</td>
<td>United Nations Educational, Scientific and Cultural Organisation</td>
</tr>
<tr>
<td>WHO</td>
<td>World Health Organisation</td>
</tr>
</tbody>
</table>

**Glossary**

**Gross Gambling Revenue (GGR)** is also referred to as expenditure or gambler losses. This is the amount wagered minus the amount won.

**Problem Gambling Severity Index (PGSI)** This in a nine-item clinical scale also used for research that classifies gamblers into no risk (0), low (1-2) moderate (3-7) or high risk (8+) categories.

**Electronic Gambling Machines (EGMs)** include machines like poker machines in Australia, FOBTs in Britain, IVTs in Norway and VLTs in Finland.
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Universal loss limits apply to the most harmful forms of online gambling

Loss limits most useful for those gamblers at most risk

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Re-regulation to improve ‘channelization’

Operators must demonstrate a ‘duty of care’: a Swedish, and Australian, problem

The global challenge of monitoring and regulation

WHO

Containing the influence of vested interests and reducing dependence on gambling revenue

Conclusions and recommendations

User registration allows for the deployment of universal harm prevention tools

Clarify responsibilities and prosecute operator duty of care

Implement stronger disruption strategies for unlicensed gambling providers

Government gambling revenue should be consolidated

A national regulator, strategy and reporting system

Effective use of the media is critical to healthy discussion

Act now to reduce harm, evaluate and modify as necessary later

A global role for Australia

Dissemination and implementation

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Report overview

Dr Angela Rintoul, 2018 Churchill Fellowship to investigate international lessons for public health policy and improved regulation of gambling: Modernising harm prevention for gambling in Australia

This study sought to understand gambling harm prevention and reduction measures in other countries in order to consider potential best practice regulatory reform options for Australia. I also sought to learn about efforts underway to combat challenges posed by online gambling, and understand how international instruments were developed for problems that pose similar threats. To do this I visited 11 locations in seven countries and interviewed academics, public servants, regulators, politicians, consumer advocates and affected others, and gambling operators. Interviews were digitally recorded, transcribed and analysed thematically using Nvivo12.

This report provides an outline of available options and lessons learned during this study. The interviews covered a range of forms of gambling, with a focus on EGMs and online gambling given the relevance of these forms of gambling to the Australian context. This report is not intended to be an exhaustive description of all measures encountered. Accordingly, it is designed to identify key strategies that are proving valuable in other contexts, in order to begin a conversation about their usefulness in Australia. It is intended to be accessible to a wide audience including public servants, policy makers, the media, researchers and the general public. More focussed analysis is planned for a future peer-reviewed publication.

User registration

- The importance of modernising Australia’s gambling system by requiring registered use of products cannot be overstated. The basic element of such a system is to register users and create an account-based system to permit access to specific types of gambling, both online and terrestrial. Providing users with supportive technology to help control their spending allows us to move beyond slogans such as ‘gamble responsibly’, ‘when the fun stops, stop’, or ‘stick to your limit’.

- Such a system could be delivered by a third-party authentication system via which gamblers can log in to the gambling mode they wish to use at any time. This would
enable the deployment of a range of tools that genuinely support users to gamble at levels that they can afford. These measures should include:

- universal maximum loss limits to prevent catastrophic losses;
- pre-commitment systems to require users to set loss limits that are appropriate to their specific circumstances;
- maximum transfer limits to gambling accounts; reductions in the maximum stake for online wagering.

**Improve operator duty of care**

- Regulators should require gambling operators to meet higher standards that demonstrate they are meeting a duty of care to their customers.
- Regulators should be resourced to conduct regular and thorough investigations into gambling operators. This could include:
  - Inquiries into data held by operators to review patterns of customer losses and how operators have responded to these, e.g. via ‘reverse VIP treatment’ to support those experiencing harm to control their losses.
  - Meaningful and serious sanctions and penalties should apply to operators who are shown to breach their obligations, and fines should be high enough to act as a genuine deterrent to predatory practices, at a level that is more than simply the equivalent of the ‘cost of doing business’.
  - Require operator data to be made available for research purposes. This could be established as a condition of licensing.

**Introduce stronger restrictions on unlicensed operators**

Resources and interventions for active regulation of unlicensed or illegal offshore wagering must be improved, including:

- Deploy DNS pop up messages on unlicensed online gambling sites warning visitors that the site is illegal and unregulated.
- Require banks to block transactions from gambling merchants (and their affiliates) who are not licensed in Australia

**National coordination and information systems**

- Establish a national regulator.
• Establish a National Gambling Reporting System, to enable annual monitoring of gambling-related activity and harm. This public health surveillance system would provide valuable information to researchers and policy makers that could assist in identifying priority areas for action and response, including the emergence of new gambling products and their associated harm.

• Develop a national gambling strategy to prevent and reduce gambling harm, with clearly identified goals and priorities, to help coordinate stakeholders, and prioritise interventions.

**Protect research and policy making from vested interests**

• The role of vested interests in research and policy making is currently significant. Industry utilises multiple methods to ensure that policy reforms perceived to be against its interests are blocked or significantly delayed. This includes political donations, active lobbying, and interference in the research process. Responses to harm, and harm prevention and minimisation interventions must be introduced in a way that prioritises the public interest, and focuses only on the prevention and reduction in gambling-related harm.

**Participate in global efforts to respond to the global challenge posed by gambling**

• Australia recently signed the Council of Europe Convention on Manipulation of Sports (the Macolin Convention). We should continue to support of international efforts to improve protection for people who gamble, protect the integrity of sport and prevent match fixing, potentially through support to an agency such as UNESCO, who have responsibility for administering and monitoring the International Convention Against Doping in Sport. We should support the WHO to undertake work to address the global public health challenge of gambling.
## Itinerary

<table>
<thead>
<tr>
<th>Date of Visit</th>
<th>Place</th>
<th>Contact and Organisation</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>24/01 24/01</td>
<td>By phone (NZ)</td>
<td>• Paul Marriot Lloyd, formerly UNESCO</td>
<td>Learn about the process to establish the International Convention Against Doping in Sport. A similar mechanism may be useful for the regulation of online wagering and other forms of gambling</td>
</tr>
<tr>
<td>22/02 22/02</td>
<td>France - Paris</td>
<td>• Eleana Felici, UNESCO Ioana-raluca Petre-sandor, UNESCO</td>
<td>UNESCO is responsible for administering the International Convention Against Doping in Sport. To learn about ongoing efforts to administer this Convention and interest in the development efforts being undertaken to explore the appropriateness of a similar Convention for online gambling</td>
</tr>
</tbody>
</table>
| 25/02 10/03   | UK – London, Brighton, Glasgow, Greenock West | • Matt Zarb Cousins, Campaign for Fairer Gambling  
• Tim Miller, Executive Director, UK Gambling Commission  
• Professor Rebecca Cassidy, Goldsmiths University of London  
• Liz and Charles Ritchie, Gambling With Lives  
• Brian Chappell, Justice for Punters  
• Dr. Jim Orford, University of Birmingham | Discussion of reforms to UK gambling regulation, especially regarding FOBTs; discussion of role of industry in formulation of gambling policy and regulation; discussion of industry influence in gambling research and policy development; discussion of campaign activity for reform of gambling regulation, and magnitude of health effects of gambling; discussion of reform wagering regulation especially regarding provision of fair wagering products; global issues around underpinnings of effective regulation and harm prevention and minimisation policy; experiences of local |
<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Participants</th>
<th>Presentation Focus</th>
</tr>
</thead>
</table>
| 10/03 | Norway – Oslo, Hamar, Førde | • Professor Ingeborg Rossow, Norwegian Institute of Public Health  
• Professor Anita Borch, University of Oslo  
• Stein Langberget, Executive Special Advisor to the CEO, Norsk Tipping  
• Ingeborg Lund, Norwegian Institute of Public Health  
• Astrid Zachariassen, Special Adviser, Department of Media Policy, Media and Gaming Section, Ministry of Culture  
• Jonny Engebø, Senior Adviser, Norwegian Gaming Authority  
• Presentation to staff - Norwegian Gaming Authority | Discussion of the conditions which enabled historic gambling reforms; responses by industry to these reforms at the time; the effects of these reforms on gambling-related harm; how the government monopoly operates and responds to gambling-related harm; activities being undertaken to disrupt illegal offshore providers; discussion of magnitude of health effects of gambling; to learn about data linkage research activities being undertaken in relation to gambling. |
| 17/03 | Sweden - Stockholm | • Dr Jenny Cisernos Ornberg, Centre for Social Research on Alcohol and Drugs, (SoRAD), Deputy Head of Department, Department of Public Health Sciences, Stockholm University,  
• Ulla Romild, Swedish Public Health Agency | To learn about the re-regulation of gambling in Sweden and to gain insights into reasons for licensing commercial online gambling providers. To learn about the research activities of SoRAD and the Swedish Public Health Agency and efforts to evaluate substantial changes to gambling arrangements in Sweden. To share recent gambling research findings from Australia. |
<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Participants</th>
<th>Event Focus</th>
</tr>
</thead>
<tbody>
<tr>
<td>24/03</td>
<td>Finland</td>
<td>Jenny Nilzon, CEO, SPER (organization for licensed gambling operators in Sweden)</td>
<td>To discuss effects of the merger of the gambling monopolies; to learn about the current gambling landscape and how gambling revenue is allocated amongst ‘good cause;’ to learn about current and future plans for CEAG gambling research; to share recent gambling research findings from Australia.</td>
</tr>
<tr>
<td></td>
<td>– Helsinki</td>
<td>Gustaf Hoffstedt, Secretary General, Swedish Trade Association for Online Gambling (BOS)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sara Näselius, Supervisor, Compliance Office, Swedish Gambling Authority (by phone)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Presentation to staff at SoRAD</td>
<td></td>
</tr>
<tr>
<td>31/03</td>
<td>Finland</td>
<td>Dr Janne Nikkinen, &amp; Professor Pekka Sulkunen, University of Helsinki</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dr Matilda Hellman and colleagues at the University of Helsinki Centre for Research on Addiction, Control and Governance (CEACG)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tapio Jaakkola, EHYT, Finnish Association of Substance Abuse &amp; Prevention</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mari Pajula, Ministry of Social Affairs and Health, Senior Specialist, Department of Wellbeing and Services, Ministry of Social Affairs and Health (Gambling portfolio)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dr Jani Selin, National Institute for Health and Welfare (THL)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Presentation to staff at University of Helsinki</td>
<td></td>
</tr>
<tr>
<td>31/03</td>
<td>Switzerland</td>
<td>Dr Vladimir Poznyack, Mental Health and Substance Use Division, WHO</td>
<td>To learn about the methods and strategies used by the WHO to conduct global surveillance of gambling.</td>
</tr>
<tr>
<td>19/04</td>
<td>– Geneva</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
• Dr Jiang Long and colleagues at the Mental Health and Substance Use Division, WHO
• Presentation to WHO staff: Is gambling a global public health issue? alcohol-related harms; to contribute to plans for the first WHO meeting on gambling planned for later in 2019; to share recent research findings from Australia; to present evidence that demonstrates gambling as a public health issue of global concern.
Introduction

Globally, commercial gambling has grown rapidly since the 1980s, and expenditure (i.e., gambler losses) is now estimated at approximately $US500 billion per annum (Hellman, 2019). Australia, which accounts for $24 billion of gambling expenditure, has the largest per capita gambling losses in the world (The Economist Online, 2017). Harms caused by gambling, measured on a DALY basis, are around two thirds the burden of alcohol use and dependence. Furthermore, people who gamble at low- and moderate-risk levels account for 85% of gambling harm (M. Browne et al., 2016). Gambling-related harm appears to have been significantly underestimated for many years, and accordingly poses unresolved public health and policy challenges. These include issues around tax revenue for states and territories, the ways in which gambling harm has been conflated with and misconstrued as ‘problem gambling’ as only affecting 1-2% of the population, and the significant role of the gambling industry via ‘mechanisms of influence’ which have been effective in slowing or stopping reform, expanding industry revenues, and significantly influencing the research agenda. Gambling harm extends well beyond the gambler, and comparable with those harms caused by alcohol use, generally experienced reggressively. Gambling is recognised as a behavioural addiction within the substance disorder section of the DSM-V. Recently, gaming disorder (digital or video gaming) was added to the ICD, sharing many of the same characteristics, and categorised in the same section as gambling disorder. There is a growing recognition of the scale and significance of gambling harm. However, there are also significant barriers to addressing these harms appropriately and effectively, including lack of comparative international experience in doing so, a relatively poor-quality evidence base, and well-resourced and effective opposition to reform from vested interests.

Gambling regulation is also a ‘wicked’ policy problem; effective regulation arguably needs to maximise benefits and minimise harms. Benefits to consumers are typically captured in the form of consumer’s surplus, that is, the value of leisure and entertainment enjoyed by those who gamble but do not experience addiction or harmful consequences. There are also benefits to corporations operating gambling enterprises, and to governments who typically tax gambling consumption at a higher rate than other consumption expenditure. Most gambling revenue is regressive; it disproportionately derives from those who are socio-economically disadvantaged (Rintoul, Livingstone, Mellor, & Jolley, 2013).
While improvements in the level of economic activity and employment are often cited as significant benefits arising from gambling liberalisation, it is important to observe that gambling expenditure is transferred from other consumption activity. It is likely that alternative consumption expenditure would be spent on more productive activities. Further, employment in the gambling industry results in a shift in employment from other –arguably more productive – economic sectors as a consequence of such transferred expenditure (Productivity Commission, 2010; South Australian Centre For Economic Studies, 2005).

As noted above, gambling-related harms are substantial and can be severe. They include financial ruin, family violence, other crime both against property and persons, mental & physical ill-health, neglect of children, and suicide. For every 'problem gambler', on average six others are directly affected (Goodwin, Browne, Rockloff, & Rose, 2017). A 2017 study found the cost of gambling in Victoria alone was around $7 billion a year (M. Browne et al., 2017). It is clear that Australia has not yet achieved an appropriate regulatory balance, as former Productivity Commission Chair, Gary Banks has noted (Banks, 2011).

Integrated understanding of global policy initiatives, community concerns, and research developments can directly inform State and Commonwealth policy makers and regulators as to how to better achieve policy balance, yielding potential benefits, while preventing and reducing avoidable harm. Further, effective gambling policy is likely to simultaneously and effectively address other pressing social issues including family violence, mental illness, and intergenerational poverty, particularly in disadvantaged or otherwise stressed populations.

In Australia, electronic gambling machine (EGM) operations are unique (B. Browne & Minshull, 2017), with venues ubiquitous in most jurisdictions, and the majority of gambling expenditure derived from their use in local clubs and hotels. Recent rapid and continuing escalation of online gambling poses further risks. Governments across the world are grappling with how to respond to the growth of both legal and illegal online gambling. This study documents lessons from jurisdictions where reforms have been introduced, who have demonstrated the efficacy of interventions that would be potentially beneficial to the Australian situation.

The study sought to investigate the following research questions:
1. What have been the most successful policy initiatives to prevent and reduce harm from gambling in other countries?
2. What conditions made these measures possible to introduce?
3. What other measures would could be introduced? Why? What has prevented these from being introduced already?

To answer these questions, I visited 11 locations in seven countries. I observed gambling operations, and met and interviewed politicians, researchers, representatives of community organisations, gambling operators and regulators in multiple locations, across Paris, London, Brighton, Glasgow, Greenock, Oslo, Hamar, Førde, Stockholm, Helsinki and Geneva. The aim was to understand how reforms had been made possible, in order to develop practical evidence to inform and support regulatory and policy reform in Australia. I also visited staff at UNESCO (Paris) and the WHO (Geneva) to learn about global efforts to regulate and monitor analogous issues and products (alcohol, tobacco, doping in sport). This report outlines the pathways that lead to the successful implementation of measures to prevent and reduce gambling-related harm and relates these measures to the context in Australia.

Ethical approval for this program was granted by the Australian Institute of Family Studies Human Research Ethics Committee.
## Table 1: Country comparison

<table>
<thead>
<tr>
<th>Country</th>
<th>Pop 18+ (m)</th>
<th>GGR ($AU, bn)²</th>
<th>Losses/ adult ($AU)³</th>
<th>Major forms of gambling</th>
<th>Max loss limits ($AU)</th>
<th>Pre-commitment (personal loss limit)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Australia</td>
<td>19.4⁴</td>
<td>23.7⁵</td>
<td>$1,222</td>
<td>EGMs, online wagering</td>
<td>Unavailable - unlimited</td>
<td>Optional. Available on some loyalty cards (venue/operator based), (must be optionally available in Victoria)</td>
</tr>
<tr>
<td>Finland</td>
<td>4.5⁶</td>
<td>2.9⁷</td>
<td>$644</td>
<td>VLTs, online gambling, inc.</td>
<td>Required for 'fast' online games $1,650/day, $3300/month. See Figure 7</td>
<td>Required for online gambling. Optional for terrestrial gambling, registered use on VLTs in public places from 2022.</td>
</tr>
<tr>
<td>Britain</td>
<td>50.9⁸</td>
<td>$25.8⁹</td>
<td>$507</td>
<td>FOBTs, online casino games, slots, wagering</td>
<td>Unavailable - unlimited</td>
<td>Optional: available on loyalty cards, online sites</td>
</tr>
<tr>
<td>Sweden</td>
<td>8.1¹⁰</td>
<td>3.4¹¹</td>
<td>$433</td>
<td>Online gambling</td>
<td>Unlimited</td>
<td>Required.</td>
</tr>
<tr>
<td>Norway</td>
<td>4.2¹²</td>
<td>1.7¹³</td>
<td>$405</td>
<td>Online gambling</td>
<td>Online casino/scratch /bingo: $690/day, $1709/mth; IVTs: $115/day, $460/mth IVTs in bingo halls: $148/day, $460/mth Overall inc. sports betting and lotteries $3,312/ month, $39,700/year</td>
<td>Required.</td>
</tr>
</tbody>
</table>

¹ Gambling products in this table have been selected for inclusion for their relevance/harm and/or comparability to Australian context.

² Exchange rates used as at 2 August 2019 1AUD = GBP£0.56; NOK kr6.05; SEK kr6.58; EUR €0.61

³ These losses are calculated based on recorded gambling in each country. There is a growing amount of unrecorded gambling, particularly in the Nordic countries, which is not captured in these per adult averages.

⁴ (Australian Bureau of Statistics, 2018)
⁵ (Queensland Government Statistician's Office, 2018)
⁶ (Statistics Finland, 2019)
⁷ (Veikkaus Oy, 2018)
⁸ (Office of National Statistics, 2019)
⁹ (Gambling Commission (UK), 2019)
¹⁰ (Statistics Sweden, 2018)
¹¹ (Swedish Gambling Authority, 2018)
¹² (Statistics Norway, 2019)
¹³ (Norwegian Gaming Authority, 2018)
Experiences and findings

This report initially presents an account of discussions and key issues identified in each of the four countries where gambling regulations were explored in Britain, Norway, Sweden and Finland, and some discussion on how this relates to Australia. Following this is a discussion of aspects that appear common or similar across these four locations, some observations about how to address important issues drawn from such similarities, and a summary of highlights from discussions involving UNESCO and WHO. Conclusions and recommendations then precede an outline of plans for dissemination of the lessons learned during this Fellowship.
Country overview: Britain

The adult population of Britain (i.e. England, Scotland and Wales\textsuperscript{14}) is 50.9 million people (Office of National Statistics, 2019), and gross gambling revenue (GGR) is equivalent to $AU25.8 billion (Gambling Commission (UK), 2019). Thus, average gambling expenditure (i.e., gambling losses) are $AU507 per adult. Britain has a commercial licensing system for gambling. Informants reported FOBTs, online gambling (including sports betting), and casino slot machine games as the main problematic forms of gambling.

\textbf{Figure 1: Big Four betting shopfront, Greenock West, Scotland, 4 March 2019}

Success in introducing FOBT stake reduction

A major focus of attention at the time of my visit to Britain was the pending introduction – on 1 April 2019 - of a reduction in the maximum stake on fixed odds betting terminals (FOBTs) from £100 to £2 per wager, or ‘spin’. These machines offer electronic versions of games such as roulette in high street betting stores, with a spin duration of around 20 seconds. A key informant noted surprise that the introduction of FOBTs had ever been allowed:

\ldots how did they [bookmakers] get to keep them [FOBTs] for 10 years?\ldots once you have a new product in the market, what happens is that bookmakers find loopholes in regulation. They pay lawyers to do that, and then they produce\ldots they make products which fill that niche, and they push the regulation to the absolute limit. Once a product is out there \ldots

\textsuperscript{14} Northern Ireland is not covered by the same gambling legislation. (Orford, 2018)
the onus then is on researchers … to produce evidence, that that product is harmful. Well, that’s almost impossible; but the double standard is that there’s no requirement on the industries to prove that a product is safe, before it’s released. – IB3

Effective use of the media

The media was described by all British informants as critical in generating discussion and debate which in turn created an environment in which politicians and regulators needed to act in the interests of reform. Several major newspapers, from across the political spectrum (such as the Daily Mail, the Telegraph, and the Guardian), regularly devoted significant coverage to gambling issues. The tone of the reporting created a sense of urgency, recognising gambling as ‘Britain’s greatest social issue’, a ‘public health emergency’, and a ‘crisis’. The stories importantly also humanised gambling harm, including reporting cases of suicides related to use of FOBTs and online gambling:

… we … built very good relationships with journalists and over a number of years. At each newspaper we had a journalist that we were working very closely with who had clout… eventually newspapers were running campaigns that were aligned to our objectives… building that consensus [across media outlets], using that coverage to leverage support from MPs and parliament, which ultimately led to manifesto commitments and ultimately right at the end a vast majority in the House of Commons who backed the £2 spin. So the government couldn’t not do that in the end. Building relationships with backbench MPs such as Tracy Crouch when she wasn’t a government minister and then she became the government minister and then she called for the gambling review. – IB1

… in the end …if the arcades want to say, “We’ll back the £2 spin. We agree with that” and then the gambling industries start turning on each other. It’s a kind of divide and rule and that’s beneficial. You can then tap into their [non-bookmaker gambling industry] supporters in parliament and their influences just to get that over the line… and then suddenly … the bookies are isolated. – IB1

Discourse, and language, matter

The content of the public debate also helped to shift the focus from blaming individuals to a discussion about a public health crisis with a focus on the severity of harms, including suicide and crime. This has resulted in a shift in language, which is already resulting in positive changes:

… we have banished the term ‘responsible gambling’. For instance, the Responsible Gambling Strategy Board will now be called the Advisory Board for Safer Gambling. – IB2
These changes in discourse facilitate a significantly different and arguably more appropriate approach, including a shift to addressing structural, commercial and socio-economic determinants of the problem. Recently, changes in discourse have occurred in some Australian jurisdictions, with Victoria and the ACT renaming ‘Responsible Gambling Awareness Week’ as ‘Gambling Harm Awareness Week’. However, many other aspects of gambling operations, harm prevention or minimisation, treatment, research and other service provision continue to be dominated by an individualised ‘responsible gambling’ discourse. This approach inappropriately dominates responses to gambling harms, particularly when it is now generally acknowledged that a ‘public health’ approach is a more appropriate way to prevent and reduce these harms.

An All-Party Parliamentary Group on Gambling

The establishment in the UK Parliament of an All-Party Parliamentary Group (APPG) on gambling galvanised political support for change. The group included influential members of the government, and was led by a skilled MP:

... we had pulled into our sphere, so like Iain Duncan Smith who was ex-Tory leader, high-profile people ... everything kind of fell in our favour... I first met Carolyn Harris in 2015. She’d just been elected and she was a Labour MP and I thought, “She’s brilliant because she’s not really factional.” She used to be a dinner lady… She knows how to get stuff done… She’s a people person… She’s Welsh and really amiable. Anyway, she ended up becoming a real advocate for it [FOBT stake reduction] and then leading the APPG and she was able to bring people in… I don’t think we would have won if it wasn’t for her. It was so important, you know, getting good advocates in parliament onside. – IB1

Many informants acknowledged the importance of acting on the best available evidence. It is a well understood industry tactic (as used by the tobacco and alcohol industries, for example) to argue that it is necessary to wait for scientific evidence at the standard of a clinical trial before action can be taken. It was acknowledged by informants that action was necessary – and possible - because of the degree of harm obviously apparent from the use of FOBTs in the Britain. Public and political awareness of the degree of harm was of importance in countering industry and some researcher arguments about the need for ‘better evidence’. In most cases, such evidence would be almost impossible to produce; and in any event, the clear community awareness of the magnitude and significance of the problem required a political response.
From the perspective of public interest and health participants the FOBT stake reduction was a major win:

* I still can’t really believe it’s happened. Sometimes when I’m driving around, I’m like, “I can’t believe we won that.” – IB1

The FOBT stake reduction reform has generated momentum in Britain to continue a reform agenda. Informants identified the need to keep pace with predicted adaptations by the industry, such as likely moves to increase the spin rate or game type used on FOBTs to compensate for the reduction in the stake size. Further, other major gambling problems, such as introducing a global maximum loss limit for online gambling, were identified as key elements of this reform agenda. Introducing stake limits for online wagering is considered a shortcut to reducing harm across providers

* I want to get to a point where there’s single sign-on. So if you want to gamble online, you have to sign up to a third party application and then that verifies your ID and then through that, you can set limits but contingent to affordability checks. So you can’t set a £1000 limit if you earn 20 grand a year and then that applies to whichever site you go to. So the stakes and prizes I think you could do very quickly… the single sign-on is more involved but I think is necessary and I think without that, then there is no justification for not restricting stakes online in a significant way. IB1

Maximising the enjoyment of gamblers

The UK Justice for Punters organisation (Justice for Punters, 2019) runs a campaign that represents a unique position, defending the rights of gamblers who are restricted by gambling companies on the basis of their relative success. The organisation has highlighted that the gambling rules in the UK favour the gambling industry, and disadvantage consumers who have been excluded (had their accounts closed or bets refused) because of their relative expertise with gambling.

The purpose of this campaign is to re-regulate the gambling industry so people can place wagers without being discriminated against based on their (often modest) history of winning bets. A key informant outlined the nature of the problem:

* Over 2000 companies in the UK have got a gambling licence, and they don’t have to gamble when they’ve got that licence. They can run the company as an accountancy or a bank, or whatever, because if you show any ability, whatsoever – and by that, I mean you don’t place accumulated bets, so you only bet on football, but you bet on Manchester...
United to win, rather than Manchester United to win plus Fred Bloggs to score the first goal. You've flagged them straight away, [as] this is potentially somebody who we don't want, right? If you back horses, and you only back them in singles, and especially if you back bigger priced horses each way, you'll be flagged straight away. If you consistently back a horse in the morning, at ten to one, and the SP is seven to one, so it's shorter… your account will not last very long at all… because you're a potential winner. It doesn't matter whether you're winning at that point, you're beating the maths, so you're dead. IB5

Now, the other really controversial thing here… is that online, they use software to link e-devices, so if you have an account with [bookmaker], and [bookmaker] flags you up as being a potential winner, another company that subscribes to that database can see your e-devices have been flagged as a potential winner, [which] is illegal in EU. Our regulators are doing nothing about it. – IB5

Similar practices have been reported in Australia in the context of online wagering (Podesta & Thomas, 2017). Other similar practices – for example, allowing the house to amend the standard rules of specific games - have also been observed in Australia. For instance, casinos are permitted to exclude gamblers who appear to be relatively successful in their gambling (e.g., by developing the ability to memorise the fall of cards in Blackjack), or simply change game rules to favour the house. A classic example of this is allowing ‘the house' to win with a deal of 22 on Blackjack at Crown Casino (Jason Dowling, 2012).

Justice for Punters is an important voice in the discussion around gambling reform, as this organisation highlights the other end of the spectrum in terms of injustices against people who gamble. It also highlights areas for greater regulatory control in order to have a genuine and sustainable gambling market that better protects the interests of all consumers and enhances benefits.

What can Britain show Australia?

The FOBT stake reduction reform is significant, not only in Britain, but also in the Australian context. In 2010, the Productivity Commission recommended a reduction in the stake on EGMs in hotels and clubs in Australia to $1 per spin, resulting in an average loss rate of about $120 per hour. Current maximum stake levels in NSW and ACT can result in losses on average of $1200 per hour. Yet, almost a decade later this recommendation to reduce the maximum bet size has not been implemented. Most Australian jurisdictions (Victoria, Queensland, South Australia and the Northern Territory) have reduced the maximum stake to
$5 per spin. This, however, is obviously well above the limit recommended by the Productivity Commission as a reasonable stake for gambling as a form of entertainment in local hotel and club venues.

The differences between progress on reform of British FOBTs and EGMs in clubs and hotels in Australia is likely derived from structural causes. FOBTs are located in commercial betting shops in local ‘High Streets’, with a maximum of four per shop, which has encouraged clustering of venues with the purpose of maximising the number of FOBTs in particular areas. The purpose of betting shops is clear, and as they came to be associated with FOBTs their presence became obvious and concerning to many.

EGMs in Australia are also located in local communities, but in much larger numbers, in some cases with hundreds of EGMs in single club venues. Of $5.8 billion expenditure on EGMs in NSW clubs and hotels in 2017-18, 70% went to EGMs operated by clubs (New South Wales Office of Liquor and Gaming, 2019). Accordingly, these are major gambling providers, with very significant resources, and a great deal of financial interest in preventing or reducing the likelihood of reform. Demonstrating these efforts, Clubs NSW provide a remarkable account of the organisation’s campaigns to oppose reforms and consolidate their revenue position in their 2017-18 Annual Report (Clubs NSW, 2018, p. 13).

However, in NSW, poker machines have been lawfully permitted in clubs since 1956. Clubs, in particular, claim that their operation of EGMs confers significant benefits on the community. Despite such claims, only a very modest proportion of the overall EGM expenditure are provided to community purposes (in NSW, about 1.3%; in Victoria, about 2.2%) (Charles Livingstone, Kipsaina, & Rintoul, 2012). This is an important issue to which this report will return in different national contexts, but it does demonstrate the extent to which some gambling providers in Britain and Australia differ in their structure and history, and the impediment to reform that perceptions of community benefit can create.

In Australia, there has been a public backlash against online wagering providers, (i.e., online bookmakers) who have pursued highly visible and sometimes aggressive marketing and advertising during sports broadcasts. Over the past two years there has been action on this issue at the Federal level through the development of a National Consumer Protection Framework for Online Wagering. The visibility of this form of gambling, arising from its
aggressive marketing during popular sports broadcasts, and the potential for harm to be inflicted on young people exposed to this, may have increased the willingness of government to pursue reforms. The strictly commercial nature of these operators (as is also the case in the UK) may have also been an important factor in promoting reform, along with the significant concerns of non-gambling parents confronted by obvious signs of their children absorbing and recalling information such as odds, the names of bookmaker companies, and the sponsorship of their favourite team by particular bookmakers (Pitt, Thomas, Bestman, Stoneham, & Daube, 2016).

However, poker machines are far less visible, and operate in venues with a stronger apparent tradition of community engagement. They are, however, ubiquitous in suburban clubs and pubs in the most Australian states but are also largely unnoticed by those who don’t frequent such venues, which tend to be located in areas of relative disadvantage or social stress (Rintoul et al., 2013). A significant attempt to introduce reforms on the operation of EGMs failed in 2013, following a successful campaign led by ClubsNSW (and supported by casino and other commercial operators), stressing the community origins of the club movement, and their need to operate EGMs to remain viable (Panichi, 2013). Little major reform of terrestrial gambling in Australia has been pursued since.

Thus, a key lesson from Britain is that community concern is a major basis for political action in pursuit of harm prevention and minimisation reforms. This concern, as in Australia in the case of online gambling, arose from the relative visibility and growth of this form of gambling, and in heightened perception of the harms associated with it. This is not to say that data on harm was the key to illustrating the extent of harm. The personalisation and humanisation of the harm done to people and their families, highlighting such tragic events as the suicide of young gamblers, appears to have been very significant in demonstrating that gambling harm is real and can have tragic consequences. This is also the case in the Australian example of online bookmakers, whose visibility became extreme amongst sports fans and the parents of children who are sports fans. At the same time, the possible consequences of the bombardment of advertising and marketing became clear, and of great concern.

However, the application of these lessons to terrestrial gambling, particularly to EGM gambling, which is the cause of the vast majority of gambling harm in Australia, has yet to be
realised. EGM gambling in pubs and clubs consumes 52% of gambling expenditure in Australia; sports wagering around 4% (Queensland Government Statistician's Office, 2018). Clearly, visibility and some understanding of the potential harmful consequences of gambling are important factors in mobilising support for gambling reform.
Country overview: Norway

The Norwegian adult population is 4.2m (Statistics Norway, 2019), and recorded GGR was equivalent to AU$1.7 billion (Norwegian Gaming Authority, 2018). This equates to an average adult gambling loss of AU$405. There are two state-run gambling monopoly operators in Norway, Norsk Tipping, who operate online gambling and land-based interactive video terminals, and Norsk Rikstoto, responsible for wagering on horse racing.

Major historic reforms in Norway

Norway announced a series of globally unprecedented reforms to gambling regulation from 2003, starting with a decision to create a government monopoly for gambling. The decision came after a reported increase in gambling-related harms. The first representative prevalence study found 49,000 Norwegians were experiencing considerable gambling harm. In a country of just over 5 million people this is a considerable proportion of the population:

…we wrote the report on gambling …a national representative study, to show that… the gambling machines were associated with a lot of problems, because there wasn’t so many people gambling on the gambling machines, but those who did gamble on the gambling machines, they tended to gamble a lot, and have more problems than others. – IN3

Concern about gambling became the topic of considerable media attention, and a strong civil society movement developed, demanding a ban on VLTs. These machines were widely distributed across over 130 private operators in semi-public spaces in Norway, such as supermarkets, restaurants, and petrol stations.

During the period 2006-2009, the following reforms were introduced to prevent or minimise gambling harm:

- While awaiting the decision of the European Union Court of Justice (EUCJ) regarding the legality of creating a monopoly (the result of legal action taken by gambling operators), the government introduced a ban on banknote acceptors on EGMs, commencing 1 July 2006. Despite some operators responding to this reform with the provision of pre-weighted coin cups, informants reported that this had an immediate effect on decreasing gambling losses.

- The government was approved to expand the state gambling monopoly to include slot machines, and removed all machines across Norway from 1 July 2007.
In 2009, the government reintroduced lower impact interactive video terminals (IVTs). These machines:

- have a global statutory maximum loss limit on these machines, per day and month (see Table 1); and

- require users to register and set a personal maximum loss limit.

Figure 2: VLT typical of those removed from 1 July 2007

Photo taken at the Norwegian Gaming Authority offices, Førde, Norway, 15 March 2019
Figure 3: 2007 Poster advising of the removal VLTs in Norway

Image supplied by the Norwegian Gaming Authority

Figure 4: IVT typical of those available today in Norway
Many Norwegian informants described the high degree of trust most Norwegians place in government, which helped to support the introduction of strong measures via government monopoly:

\[
\text{I think there is a cultural thing that we in Norway are used to a strong state… We trust each other, and we trust the state. – IN2}
\]

\[
\text{Everything is about trust. Having this [gambling] identity card, we started this 30 years ago, as building trust that your draw is secure and that you will have – your ticket is registered, and that you will have your money at once, if you win. You're building a connection over time, and not misusing that trust at all, not to try to sell them anything more, it's just to make the relation. We have this mandatory since 2009, but then 20 years before that, really had it implemented… – IN4}
\]

According to informants, the decision to introduce the ban on banknote acceptors was based not on specific research evidence, but a common-sense approach to policy, which was formed not on unattainable standards of evidence, but on the best available evidence and logical deduction. As in the UK, the absence of gold-standard evidence did not stand in the way of meaningful reform. The ban resulted in an immediate reduction in revenue. Describing the array of changes, there was an ethical element to the new approach to the provision of gambling:

\[
\text{We were the first company ever, I think, to introduce this mandatory player's card into the VLTs, in 2008, when we got the monopoly. We said that we want to be different… It took down the revenues for good causes, quite a lot, but who wants that money? The people playing there are vulnerable, they are often young men, immigrants with low education, problematic social profile, children who don't get money because their fathers are playing – it really is a question of value, what kind of money should finance good causes, and the state, and ... you should look at what kind of harm it does. What's the cost for gambling addictive to society, in terms of criminality, in terms of treatment from hospital, healthcare all this. – IN4}
\]

There are systems in place to ensure that people do not share their registration or gambling cards, including by calling the registered card holder to determine if they had used the card. For instance:
if we see that they tried to circumvent, or activity, for example, if they use a player’s card for their wife…it’s often the same bank account registered at, and if we see that this game, these cards are using at the same time, we have this monitoring system giving us alarms, and then we call their wife and ask, how are you doing?… Did you have a nice gaming experience at the VLT shop yesterday? She says “no, no, no [it was not me using the machines]” – IN4

In addition to this, multifactor authentication has recently been introduced in Norway, requiring a code to be sent via SMS when logging into a VLT.

Player tracking for ‘reverse VIP treatment’

Within this system harmful gambling may still occur. To address this, Norsk Tipping described the program that they run to protect their customers from losing too much money:

One unique thing we also do, which is extremely – I don’t know if anybody do it – is that we have three person, full-time, calling people that we see lose a lot of money, or change behaviour. So, we are monitoring the whole database, and if we see some kind of shift in activity, suddenly we get some alarms, and then we call them, and asking them “what has happened recently? Do you want to talk with us, you know that we can set your limits, you can exclude yourself?” because then they get really personal everybody has – they can’t afford it. We always tend to believe that people playing on casinos are gamblers, and gamblers have money – they don’t. Then, we can block them out of the system, help giving them numbers to social care, to institutions, and we have – in two years, we have 5000 of these calls, and it’s kind of reverse VIP treatment. – IN4

Responding to illegal offshore gambling providers

Like many governments, Norway is currently faced with the problem of international operators promoting and providing online gambling services to Norwegians. At the time of my visit the Government was intending to announce a plan to introduce pop-up messages for consumers visiting unlawful online gambling sites, a retreat from previously proposed IP blocking:

… when you go into website, you [will] get this poster saying you are now entering a site which is not operating under Norwegian Law, but it’s not locked. You can still click and move onto it, … this is in comparison to the … blocking… So that was considered, but we decided to suggest that we would have just this poster basically coming up on the site when you enter it says “Beware, this is not allowed, you are in Norway, this is not allowed under Norwegian Law.” You can still enter because we have not criminalised the player, we have criminalised that we have made it illegal for someone to offer it. We are not saying
In addition, since 2010 the Norwegian Gaming Authority has been working to block financial transactions to and from unlawful gambling merchants and their affiliates, such as third-party payment providers. Surveillance of chat forums indicates early success, with many discussions from gamblers about winnings that have not been transferred to their accounts. An evaluation of this is underway. While this may not interrupt gamblers, who might continually lose money, it is likely to provide a disincentive for many to the creation of an account with an unlicensed operator, and for those with accounts to discontinue these.

**What can Norway show Australia?**

The introduction of a system of registration for identified gambling would provide a platform for the delivery of multiple harm prevention tools – such as pre-commitment – to genuinely support people who gamble to control their spending. This is one of the most important lessons from this project. The Norwegian reforms demonstrated substantial reduction in gambling harms following the introduction of registered gambling (Lund, 2009; Rossow & Hansen, 2015), and indicated that there had been very little migration to other gambling forms arising from the EGM reform processes, including the period of EGM prohibition. It also provides a guide for reforms that could be effective in Australia, given the centrality of EGMs to the prevalence of gambling harm in this country. It is an important lesson for those who opposed pre-commitment (the centre piece of the Wilkie-Gillard reforms) in 2010, for example. While the Norwegian reforms went much further than was proposed in Australia in 2010, they certainly demonstrate the feasibility of those reforms.

In relation to online gambling, the Australian Communication and Media Authority (ACMA) has new powers under the *Interactive Gambling Act 2017 Amendment* to investigate and prosecute offshore providers breaching Australian laws. The Interactive Gambling Act prohibits unlicensed online operators from offering any gambling services to Australians, and limits registered providers (i.e., those licensed in any Australian jurisdiction) from offering any gambling services other than wagering, and the purchase of lottery tickets.
In the first 12 months of its expanded powers, measures already undertaken by ACMA included educating online providers about Australian law to ensure they are aware of the restrictions in Australia for online gambling, and promoting a register of licensed gambling operators in Australia (Australian Communications and Media Authority, 2018). These enforcement actions at this stage are modest, with warnings and notifications to other licensing authorities being the main penalty. A consultation regarding stronger disruption measures has been undertaken. The Norwegian regulators have demonstrated success in financial transaction blocking. Plans to introduce DNS pop ups are likely to be of immediate use to consumers who may be unaware that the website they are visiting is not regulated under Australian laws, and may not think to look the website up on the ACMA register of licensed online gambling providers.

Norway travel note

The Norwegian Government has a serious commitment to decentralised government. The Norwegian Gaming Authority is located in Førde, a town of just over 12,000 people on the west cost of Norway, 420 km from Oslo. An unforeseen benefit of the Norwegian gambling system arises from this policy of decentralisation – that is, the provision of economic benefits to smaller population centres, funded by the revenue derived from gambling operations.

![Figure 5: Snow falls whilst boarding the flight from Førde back to Oslo](image)

Photo taken at Førde airport 15 March 2019
Country overview: Finland

Finland ranks fourth in the world for per capita gambling losses (The Economist Online, 2017) with an adult population of 4.5 million people and GGR equivalent to $AU2.9 billion, meaning that, on average, every Finnish adult loses around $AU640 p.a. Like Norway, Finland operates a government monopoly for gambling. In 2017, the three previous government monopoly companies merged into one, which is now known as Veikkaus Oy.

Gambling is widely accessible in Finland, with around 20,000 EGMs available across the country. This means the EGM density in Finland (about 4.4 per 1,000 adults) is not dissimilar to that in Victoria, Australia (5 EGMs per 1,000 adults, as reported by the VCGLR for 2017-18) (Victorian Commission for Gambling and Liquor Regulation, 2018). Around 17,500 machines are available in semi-public places, such as near grocery stores and at kiosks in service stations. There are a further 2,600 machines in around 90 arcades. Gambling in these venues is typically more intense, as alcohol can be served, and there are fewer restrictions on use of these machines. Legislation had been passed to require people who gamble to use their registration cards for these machines from 2022, although arcade machines will be exempt from this requirement. The operator noted that introducing this change was not difficult from a technical perspective:

_The difficulty comes when it comes to [a likely drop in] player amounts and thus revenue_

… – IF5

Informants noted concerns about the wide accessibility of gambling machines, and an online public petition was aiming to collect 50,000 signatures to remove the machines from grocery stores and service stations at the time of my visit.

_… it’s not easy to buy milk in Finland without running into a machine. So it’s understandable that you want to make that a little bit harder to play in those._ – IF5

Children could lawfully use gambling machines in Finland up until 2010, when an 18+ age limit was introduced.

_It was 15 [years old] and I think it was possible for children who were below 15 to gamble on EGMs with their parents or some other adults._
Like the other Nordic countries visited, there is ongoing discussion about the difficulty in maintaining a state-run monopoly in the context of significant marketing from online offshore gambling providers:

it's only Finland and Norway nowadays with a complete monopoly in Europe basically and Norway is not even inside the EU. So Finland is pretty much alone now, but when we look at Denmark and we look at Sweden we feel that they were forced into the licensing system because their own monopolies couldn't handle their market share. They couldn't keep up with the competition and we are now afraid that the same thing is going to happen here if we don’t get permission to be competitive online. – IF5

Figure 6: Example of Veikkaus online casino game

Translation: Gold Jaska 2: Gold exploration continues in Gold-Jaska’s new game. Gold Chute Bonus Game lets you flush gold with Jaska; selected gutters will wash away jewels that determine the winning factor. When Jaska whispers, the dog runs in and at the same time brings wild patterns to the reels. You can double your winnings by finding a doubling factor on Jaska’s treasure map. The game has a winning RAY Jackpot.

Universal loss limits apply to the most harmful forms of online gambling

A range of universal maximum limits were introduced in Finland for online gambling in 2017:

- Users are required to set their own loss limits on ‘red’, or more harmful ‘fast paced’ online gambling;
- A maximum loss limit of the equivalent of $AU1639/day and $AU3279/month apply; and
- A maximum transfer limit of $AU32,786 applies to all Veikkaus gambling accounts.

A more detailed outline of these restrictions are reproduced below (Rinkinen, 2018).

Figure 7: Veikkaus loss and account transfer limits

Loss limits most useful for those gamblers at most risk

Figure 8 presents results of a survey of Veikkaus customers shows that those gamblers experiencing the most harm (PGSI 3+) were more likely to report finding these limits useful in controlling losses.

Figure 8: Limits help moderate and high-risk gamblers control spending

Reproduced from Veikkaus presentation. (Rinkennen, 2018)
Funding ‘good causes’ via gambling creates problems for Finland, and Australia

Like the other Nordic countries discussed in this report, Finland uses most of its gambling revenue to fund ‘good causes’. Around 70% of GGR is allocated to three Government Ministries to grant funding to such organisations and activities. Under the Finnish Lotteries Act, 54% of the hypothecated revenue is allocated to the Ministry of Culture and Education, 43% to the Ministry of Social Affairs and Health, and 4% to the Ministry of Forest & Agriculture (for the support of horseracing). The balance is shared between retailers, and un-hypothecated taxation.

However, the application of such a significant proportion of gambling expenditure to ‘good causes’ has created a problem for policy makers and reformers. Given that Finland does not have the oil revenue of Norway (which is directed towards a sovereign wealth fund used to support a range of public goods, including education and health), if reforms were to be introduced, significant social support funding would need to be identified.

… in Norway it is always the case that they have this oil money, they don’t really need the gambling proceeds so much, so they can do pretty much what they want because it gives them a certain amount of the flexibility. – IF6

Another informant also noted a cultural difference between the countries

They [Norwegians] have the oil [money]… They don’t need this [gambling revenue]. They also have the morals. These are good - good reformed protestants who believe in hard work and honesty. We are Lutherans. We are much more liberal in everything; alcohol and everything… in Finland we have this kind of individualism that - that implies responsibility by the gamblers and it’s their job - if they want to just destroy their lives then let them do so … this kind of attitude is very strong. Then - and also this sort of - in Sweden too… – IF4

Almost all participants noted that using gambling revenue to directly fund good causes was problematic, by creating a considerable obstacle to the introduction of serious reforms:

I think it would be better if the funding was not directly from the gambling revenue, not directly anyway… No one is claiming that we are sort of biased. That’s not happened but it would be a better thing if there was other sorts of funding independent of the gambling revenue but I don’t think it’s going to happen in the near future at least. – IF1
… I do a gambling prevention project funded by gambling money… that gives extra pressure to us and our credibility to talk about gambling prevention and what we should do, because if you think of course those with gambling problems find a lot of revenues comes from them and if you try to prevent gambling problems it means that proceeds go down. – IF3

This is a major difficulty for the gambling reform project in Finland. Gambling has been regularly legitimised by claims of community benefit, as is the case in Australia. However, in most Australian jurisdictions, the amount of such support as a proportion of gambling revenue is very low. This revenue is therefore relatively substitutable. Given the very high dependence of Finnish ‘good causes’ on gambling revenue, even modest reductions in expenditure resulting from effective harm prevention or minimisation reforms would put government under some pressure from charitable and social purposes. Thus, although it is the case in Australia that gambling operators have succeeded in enlisting some charitable or social causes to their cause by providing relatively modest donations, the situation in Finland demonstrates the real difficulty of charities becoming overly reliant on gambling revenue.

However, given the reliance of state and territory governments on gambling revenues, an analogous situation applies in Australia at the state and territory government level. A key lesson from Finland is to avoid dependency on revenue from products which, because of their harmful nature, may be the subject significant regulatory reform as the harms become more apparent. This implies that reform becomes more politically feasible when dependence on gambling revenues declines. In an Australian (and indeed, Finnish) context, this suggests that incremental reforms are most likely to be politically feasible, as the revenue consequences for each incremental reform will likely be modest. This is contrasted to the ‘big bang’ nature of the Norwegian reforms.
Country overview: Sweden

With an adult population of 8.1 million (Statistics Sweden, 2018), and GGR equivalent to $AU3.4bn (Swedish Gambling Authority, 2018), Sweden spends around $AU433 per adult, and ranks 13th in the world for per capita losses (The Economist Online, 2017).

Participants in Norway, Sweden and Finland described significant public and political concerns about the volume and content of advertising by international gambling operators, most often licensed in the UK. This, often aggressive marketing has resulted in an increasing number of people using previously unlicensed offshore gambling providers.

if you had come three weeks ago and taken the subway, you would have seen it was totally wallpapered with gambling advertising. The whole subway. Ninja Casino, I don’t know if you have seen the advertising for them, but they bought up every single ad when you took the stairs up from the subway. You could see every ad on the way up and along the platform. – IS3

Re-regulation to improve ‘channelization’

Until 1 January 2019, Sweden operated a government monopoly for terrestrial and online gambling. However, over the past several years a high level of gambling was reportedly occurring outside the monopoly, with unlicensed offshore online operators. To address this, a ‘re-regulation’ was described as an inevitable solution, to improve ‘channelization’.

Channelization refers to capturing regulated gambling through licensing of gambling operators, and reducing the leakage of gambling revenue to unlicensed or illegal offshore gambling providers. The purpose of channelization is three-fold: to improve consumer protection by requiring licensed companies to adhere to harm reduction measures; capturing otherwise externalised gambling revenue by requiring ‘point of consumption’ taxation, and improving the integrity of gambling provision.

In addition, as an EU member state, Sweden also needed demonstrate that it was compliant with EU laws:

… we have pressure from the European commission too, that didn’t agree that our monopoly was operating according to the new law, that we need to do something; either strengthen the monopoly, or have a licence [system] …So we needed to do something to be compliant with EU law, … we are such a big market that wasn’t regulated, that we
Re-regulation allowed commercial operators to apply to for online licenses in Sweden. At the time of my visit (March, 2019) 76 companies had already been licensed to offer gambling in Sweden. The government monopoly, Svenska Spel, remains the sole operator of around 7,500 terrestrial EGMs.

Licensed companies must comply with Swedish gambling regulations, for instance monitor users gambling behaviour, and help customers limit their losses if they are experiencing harm. A tax of 18% applies to all new operators. This was described by some participants as a compromise, as it was low enough to encourage operators to become licensed, and high enough for the government to relax licensing arrangements in Sweden.

Reflecting on why so many Swedes were gambling outside the legal system, an informant described the monopoly had struggled to provide a wide range of sufficiently attractive gambling options. A similar challenge was also noted by informants in Norway and Finland:

… the sports book portfolio, what you actually can bet on is always much wider when it comes to operators that work on an international level compared to the state-owned operator. It comes as no surprise since those international companies, they are quite often very big and they serve several markets. For that reason they [international companies] could offer a more attractive sports book portfolio. That was probably more important, they offered a higher return to player. So when the state maybe offered something between 50% to 80% return to player… The international companies offered something like 95% RTP. That was quite obvious for the punters that they could play longer or cheaper or whatever when they turned to the international operators. Another reason obviously the online casino, the state didn’t offer that kind of game at all. Any kind of customer that was interested in online casino had to abandon the monopoly to meet their needs.’ – IS1

Operators must demonstrate a ‘duty of care’: a Swedish, and Australian, problem

Swedish legislation requires licensed companies to track gambler usage of their products, and provide support and advice to gamblers shown to be experiencing harm. It is mandatory for operators to maintain evidence of contact with every customer with a monthly limit greater than $AU1,639, so that upon request they may demonstrate they have fulfilled their duty of care.
However, fulfilling the duty of care, and other parameters for problematic use, are not well defined in the legislation. Furthermore, usage is not centralised, or tracked across providers, meaning it is impossible to know about gambling occurring across multiple accounts. Although this ambiguity is likely to work in the favour of license holders as it may be difficult to prosecute penalties, one industry informant noted:

_I think it would be really good if the SGA, the Swedish Gambling Authority could define the outcome, the result, what they want to achieve… It always uses a sort of framework legislation, whereas in most other European countries, the legislation is much more detailed. It hasn't worked that well when it comes to legislating gambling, because we as an industry body and the operators and many stakeholders out there. We ask for clarifications, but we don't receive much back... – IS1_

Operators are also required to use a player tracking system that should help to identify gamblers experiencing harm in order to deploy appropriate responses to support these gamblers. However, industry informants, researchers and regulators all agreed there was a lack of specificity around what constitutes a duty of care to customers, the type of response that would be considered appropriate, or penalties that may apply.

However, a recent investigation by the Swedish regulator has resulted in a license of one gambling company being revoked. It was reported in June that an investigation into Global Gaming revealed serious breaches of their responsibilities (Staff Writer, 2019). When asked to provide details of communication with 10 customers who had lost between $AU37,000 and $AU168,000, over the course of one month, the company could not provide evidence that it had undertaken any duty of care to ensure that these customers were able to afford this level of loss, or taken action to verify the source funds in line with their responsibilities under the money laundering act.

This investigative approach provides a useful template or processes that could be adapted to a range of operators in Australia. Gambling companies in Australia are required to adhere to ‘Responsible Gambling Codes of Conduct’. However, despite widespread reports of gamblers losing vast sums of money, there have been very few, if any, cases of operators being significantly penalised for not adhering to these codes (Rintoul, Deblaquiere, & Thomas, 2017).
The global challenge of monitoring and regulation

The challenges of regulating online gambling across borders are vast. At this stage there are no consistent regulations, agreements or frameworks available to support governments to protect their citizens from predatory gambling operators who promote their products and provide unlawful services to citizens over the internet. Norwegian, Swedish and Finnish participants in this study all described being overwhelmed by international gambling operator advertisements, including broadcasting in the local language on television. In Australia, while the illegal offshore gambling market is relatively less visible, there are many benefits that could be gained from an international agreement that required consistency in the terms and conditions under which operators around the world provide gambling.

For these reasons, I visited WHO and UNESCO to understand how these agencies have supported global efforts to, respectively, prevent harm from alcohol and tobacco, and regulate doping in sport.

With a mandate covering physical education and sport, UNESCO has responsibility for administering the International Convention Against Doping in Sport (the Convention), and hosts the Convention Secretariat. The Convention was signed in October 2005, and came into force in February 2007.

There are only around 10 state parties that have not signed the Convention, making it the second most widely signed convention in the world, after the International Convention on the Rights of the Child. It provides a useful framework for considering ways to establish an international convention to regulate online gambling across borders.

The decision to establish the Convention came about following an increasing number of doping scandals affecting the sporting world, including the Tour de France and BALCO labs (Marriott-Lloyd, 2010). A number of countries were increasingly concerned about the impact of these doping scandals, and extensive efforts were undertaken by several countries, which worked to prepare proposals ahead of the agreement to develop the Convention, to aid swift ratification. The Convention was underwritten by several countries to assist and resource state parties, particularly low-income countries, to achieve the objectives of the Convention, and to enable ongoing administration and monitoring.
The Council of Europe has established The Convention on the Manipulation of Sports Competitions (the Macolin Convention), however although Australia is signatory to this, it is a more regional agreement than the UNESCO Convention, and is not universal in scope.

Working towards the development of an international convention for online gambling would enable international cooperation to improve online gambling regulation, for example by:

- Assisting data sharing between countries, for instance to identify instances where bets are placed on unlikely or unexpected game events,
- Instituting a global system to identify and discipline players participating in match fixing,
- Requiring signatory states to institute national codes to echo and support the global system, and
- Provide standards for improved consumer protection for people who gamble.

**WHO**

The World Health Organisation, headquartered in Geneva, was recently given a mandate to address harms from gaming, such as video gaming. At this stage the WHO does not have a mandate to address gambling, despite increasingly obvious linkages between gaming and gambling.

The purpose of my visit was to learn more about the monitoring and surveillance systems operated for alcohol and tobacco control, both to identify analogous interventions for gambling regulation, and to support development of a National Gambling Reporting System in Australia. Work was also undertaken with the WHO Mental Health and Substance Use Division to support planning of the first WHO meeting on Gambling, currently scheduled for December 2019.

The global gambling industry is vast; recently estimated at $US500 billion (Hellman, 2019). This figure does not include the expanding unregulated or illegal gambling market. There are many organisations and companies that have an interest in not only maintaining but increasing their profits despite the harm that is generated through this growth. This is increasingly likely to include expansion of gambling into middle and low-income countries. There is therefore a pressing need to expand understanding of how best to prevent and
minimise harm across all forms of gambling, and in different jurisdictions. Further, little data is available to illustrate the expansion of gambling into low and middle-income countries, although anecdotally this expansion appears well underway.

**Containing the influence of vested interests and reducing dependence on gambling revenue**

The global gambling industry, like other global ‘dangerous consumption’ industries, can be expected to utilise all means to ‘protect’ its existing markets, expand its offerings into those markets, as well as expand into new markets.

Some examples of these industry tactics arose from informants in Britain, Finland and Norway, who reported that industry representatives had undertaken to distort or suppress research findings that may have supported the case for reforms. This included:

- recruiting international researchers to critique and discredit research findings that might threaten their revenue streams,

  ... they [industry representatives] ... said that we had done it [the research] wrong...they even had... [international researchers] write a critique of our report, saying that we had done it wrong ... But of course, they [international researchers] hadn't read the report; they'd only read the English summary. – IN3

- industry representatives ‘reminding’ researchers where their funding comes from before they speak at conferences or international meetings, and discrediting research that does not reflect well on their operations

  *I was in one meeting with one director from the [industry organisation] and he said to me during our private discussion “How [can] they [research group] publish such garbage with the funding?” I said “Is it your funding” I thought its funding from Ministry but he said “okay, but we give it to them.” Of course, in private interactions they say it but in public its more difficult...* – IF6

While in Britain one participant observed in relation to industry funded research:

  “It’s not about the source of the money; it’s about the quality of the research.” – IB2

Others argued it was important to establish the best possible funding systems to ensure there was no potential for contamination:
‘Why would you ever structure your funding in a way that isn’t optimal? And the way that you do that is you totally separate the source of funding from the research commissioner… there’s plenty of evidence out there to suggest … that independent research is a better source of evidence for policy…” – IB3

As the former Director General of the WHO explains below (Chan, 2013), large industries, such as gambling, should be carefully guarded against influencing policy and research:

‘...it is not just Big Tobacco anymore. Public health must also contend with Big Food, Big Soda, and Big Alcohol. All of these industries fear regulation, and protect themselves by using the same tactics.

Research has documented these tactics well. They include front groups, lobbies, promises of self-regulation, lawsuits, and industry-funded research that confuses the evidence and keeps the public in doubt.

Tactics also include gifts, grants, and contributions to worthy causes that cast these industries as respectable corporate citizens in the eyes of politicians and the public. They include arguments that place the responsibility for harm to health on individuals, and portray government actions as interference in personal liberties and free choice.

This is formidable opposition. Market power readily translates into political power. Few governments prioritize health over big business. As we learned from experience with the tobacco industry, a powerful corporation can sell the public just about anything… When industry is involved in policy-making, rest assured that the most effective control measures will be downplayed or left out entirely. This, too, is well documented, and dangerous.

In the view of WHO, the formulation of health policies must be protected from distortion by commercial or vested interests.
Figure 9: Presenting the first seminar on gambling at the WHO

Photo taken in Geneva, 16 April 2019
Conclusions and recommendations

Over the past decade Australia has experienced several setbacks when trying to introduce measures that would contribute towards a better balance to increase the benefits of gambling and minimise the harms. However, a key lesson learned on this project was that it is possible to implement changes that would modernise gambling arrangements, and to do so in timeframes that may seem optimistic to many public interest stakeholders. For example, Australia currently operates online wagering using a system that requires verified identification of online wagering account holders. Such a system could readily be adapted to high intensity forms of terrestrial gambling, such as EGMs. The principle of this as a reasonable measure to protect consumers has been established, and the technological framework to apply such a system is in place. As with the stake reduction achieved on FOBTs in Britain, the only opposition to such an initiative comes from the vested interests.

User registration allows for the deployment of universal harm prevention tools

A key element of a public health approach is that interventions are universal and population wide. User registration (whether via a single operator system, central register, or a third-party authoriser, such as an authentication system) provides a platform to deploy a range of harm reduction measures for every person who intends to gamble. This is already required for online gambling, but EGMs - the gambling product that causes the highest level of losses and harms - use remains anonymous. Informants from this study reported that verification occurs in ‘a nanosecond’. In Australia, online wagering companies are allowed 14 days to verify their customers identity. EGM operators do not require any verification of identity.

Universal user registration is essential as it operates for all people utilising gambling products and can provide tools to avoid the development of a gambling problem. Currently, most strategies to reduce harm are targeted (self-exclusion, player tracking), optional for users and likely to have marginal effects (static signs in venues advising gamblers to ‘stick to your limit’).

Examples of successful tools that could be readily adapted to Australia to replace out-dated systems, or complement existing measures are outlined below. In the context of EGMs these include a range of safety features such as:
• Global maximum loss limits— a universally agreed reasonable amount of money that can be lost on machines and deposited into gambling accounts per month and year. These limits are designed to prevent catastrophic losses only.

• Universal pre-commitment, requiring users to set limits that are relevant to their circumstances, which are likely to be lower than the global maximum.

• Until central registration to facilitate loss limits and pre-commitment has been introduced, a stake reduction for online gambling should be introduced.

• In the interim, an immediate and simple mechanical change to EGMs to remove banknote acceptors. This had an immediate effect on gambler losses in Norway. At this stage South Australia and Tasmania are the only jurisdictions in Australia that do not permit banknote acceptors on EGMs. In addition, a reduction in bet size and modification of harmful game features would also be valuable.

Clarify responsibilities and prosecute operator duty of care

An expectation of gambling operator’s duty of care should be developed and more clearly and consistently defined. Regulators and related authorities should develop a range of investigative approaches and measures for both terrestrial and online gambling that require gambling operators to provide genuine evidence of duty of care to their customers. Where this cannot be demonstrated, serious consequences such as suspension or revocation of licenses and/or substantial fines should be available to regulators leading these investigations to penalise operators.

Implement stronger disruption strategies for unlicensed gambling providers

Measures such as deploying DNS pop ups to warn users accessing illegal or unlicensed offshore providers is one measure that would provide more immediate information to people who gamble online. Current practice in Australia is to promote the existence of a register of licensed companies. This strategy is likely to result in the transfer of timely and appropriate information to users of unlawful sites.

Cooperation between regulators and the banking sector to develop require banks to restrict transfers of money from merchant code associated with gambling providers and their affiliates.
Government gambling revenue should be consolidated

It is important that gambling revenues be provided to a consolidated revenue, rather than earmarked for specific agencies or grant schemes. The system of using gambling revenue to fund ‘good causes’ in Nordic countries provides a cautionary tale. In most of these countries a range of well-respected community activities such as local and elite sports, drug and alcohol treatment and prevention, and child protection organisations are funded largely through gambling revenue. This creates a web of dependencies and conflicts that makes it difficult for these organisations – and the large number of people that benefit from these organisations - to support meaningful reforms that may affect their revenue stream.

The system works differently in Australia with “not for profit” clubs who operate EGMs receiving a tax break in return for claims of community benefits. Generally, genuine donations made by these clubs – excluding overhead operating costs for instance – are typically between 1-3% of gambling losses. Reviews and studies into these receipts repeatedly find this is an inefficient way to fund community activities (Henry, Harmer, Piggott, Ridout, & Smith, 2009; C. Livingstone, Francis, & Johnson, 2017), and promotes a myth that gambling at these clubs is an important source for funding community activities.

A national regulator, strategy and reporting system

There is an array of actors who are, or could be involved, in preventing and reducing harm from gambling. There is also a very long list of measures that could be implemented to improve public health and safety now. For instance, a recent analysis of analogous interventions from other areas of public health identified 104 measures that could be adapted to gambling in Victoria (C Livingstone et al., 2019).

New nationwide efforts are required to coordinate consistency. Australia’s gambling landscape is complicated at the national level due to the responsibilities currently falling to state and territory governments. Introducing a national regulator to oversee at least online gambling would enable the introduction of measures such as financial transfer blocking. It has also been recognised that the Australian Constitution allows for the Commonwealth to oversee gambling under constitutional tax powers. A national regulator that oversaw terrestrial gambling would also provide an improved opportunity to develop and a wide range of improved nationwide harm prevention and reduction measures. A national strategy is...
required in order to coordinate, prioritise and properly resource Australia’s response to preventing and reducing gambling related harm.

Australia should also establish a National Gambling Reporting System, that would enable annual monitoring of gambling-related activity and harm. This public health surveillance system could inform the National Strategy and provide valuable information to researchers and policy makers to identifying emerging trends gambling products and related harms, and inform priority areas for action and response.

Effective use of the media is critical to healthy discussion

Media must be utilised effectively by politicians, experts and public interest advocates to support an informed and educated discussion of the scale of gambling-related harm and appropriate responses to this. This will assist in communicating the magnitude of harm from gambling in Australia in order to create momentum that can galvanise resources and attention that will result in appropriate responses being implemented.

Act now to reduce harm, evaluate and modify as necessary later

A key lesson from this study was that, in many cases, governments and regulators introduced reforms acting on common-sense deduction based on the best available evidence, and the precautionary principle, not waiting for “gold standard” scientific evidence to emerge. Such evidence is almost impossible to obtain for public health problems, given the ‘real world’ nature of their context. The gambling industry commonly calls for irrefutable evidence of any intervention, knowing such evidence to be virtually impossible to produce. Multiple examples of this tactic were observed.

The key strength of a public health approach is that it offers examples across a range of appropriate methods to prevent or reduce harm across multiple domains. Thus, intervention X may have worked (that is, lead to reduced harm) in tobacco control; adapting it and applying it to another area of concern (such as gambling) is a question of analogous application, rather than slavishly following a specific approach. Nonetheless, evidence derived from analogous contexts, or from ‘common-sense’ application of public health principles using best available evidence, is likely, and has in some countries been shown to be, highly effective.
A global role for Australia

In February 2019, Australia signed the Council of Europe Convention on Manipulation of Sports (the Macolin Convention). Australia should continue to increase the reach and scope of global efforts to improve protection for people who gamble, as well as protecting the integrity of sport. This could potentially be achieved through partnership and support to an agency such as UNESCO, who already has responsibility for the International Convention Against Doping in Sport and have expressed interest and concern about addressing the harm from gambling at the global level. This may best be achieved through commencing work towards the development of an International Convention for Online Gambling.

While as a nation our expertise in gambling studies and policy development is small relative to analogous products such as alcohol and tobacco, our experience of harm is vast. Should we invest greater resources and attention to preventing and reducing gambling-related harm, we could develop a global reputation for our expertise in addressing harm from gambling, in the same way that Australia was seen as a global leader in efforts to reduce harm from drug use and prevent the spread of HIV. From a research perspective, Australia has potential to become a world centre for development of gambling harm prevention and minimisation strategies and interventions. This provides an opportunity that may significantly benefit not only the public, but also Australian universities and research centres.
Dissemination and implementation

Presentations were given at Stockholm University, University of Helsinki and the Norwegian Gaming Authority during the Churchill Fellowship. A lunchtime seminar on gambling as a public health problem was given at WHO Headquarters in Geneva during my visit. In addition to this, the following avenues are planned for wider dissemination in the medium term:

- I have been invited to present a background paper outlining key lessons for global regulation at the first WHO meeting on gambling in Istanbul, Turkey, 3-4 December 2019;
- I have been invited to present findings at the Alberta Gambling Research Institute conference in Banff 25-27 March 2020.
- A manuscript outlining more detailed analysis will be prepared for publication in the peer reviewed scientific literature;
- A short article summarising key findings will be prepared for open access online publication, such as The Conversation;
- Opportunities will be sought to present findings at policy and scientific conferences, such as those convened by the Australian Institute of Family Studies, the Public Health Association of Australia and the International Think Tank on Gambling;
- Briefings and/or presentations will be sought with relevant state and Commonwealth agencies including the Victorian Responsible Gambling Foundation and the Department of Social Services.
- The experience and lessons learned during this Fellowship will inform future submissions to Australian and other international inquiries related to gambling.
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