



South Australian Centre for Economic Studies

Evaluation of YourPlay Final Report

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Key Findings and Recommendations

“The system has been implemented successfully, but it has not been a success.”

This comment from a venue manager in our qualitative research summarises quite effectively the results of this evaluation.

System implemented well

Management of the implementation of YourPlay by Liquor and Gaming was in almost all respects very effective, and in some cases exemplary.



IT system worked

Complex IT system project for the pre-commitment system was procured and managed to time and budget, with the final system having proved very stable in use.



Stakeholder management successful

The stakeholder management around system requirements and preparation for launch was also exemplary:

- every venue based loyalty system successfully tested for stability prior to launch,
- all 502 venues had purchased and installed the necessary technology and trained their staff prior to launch.



Gamblers who use YourPlay benefit

Survey evidence suggests that those gamblers using YourPlay cards are achieving reasonable rates of benefits:

- 23 to 28 per cent reported being more aware of their expenditure;
- 24 to 29 per cent reported that YourPlay made it easier to stick to the limits they set for themselves.

However, usage of YourPlay in Victorian hotels and clubs is very low.

Recent evaluations of voluntary responsible gambling measures (including pre-commitment) have seen usage of 0.8 per cent, 1.2 per cent and 13 per cent of total turnover across the whole system, suggesting usage of 1 to 5 per cent should have been achievable for YourPlay.

In 2017/18 YourPlay cards were used in sessions amounting to **0.01 per cent** of gaming machine turnover in Victorian hotels and clubs.



Few hotels or clubs achieved the average usage levels seen elsewhere.

1 venue reached usage of 0.8 per cent of turnover

3 venues were able to get close, at between 0.5% and 0.8% of turnover.

494 hotels and clubs fell short, including 170 with no YourPlay turnover in 2017/18.

Hotels and clubs not complying with many of the requirements of YourPlay

YourPlay was only offered in 31% of visits when joining loyalty (it is a legal requirement to offer YourPlay to anyone joining a gaming loyalty scheme).

At least one negative comment about YourPlay was made to the researchers in 46 of the 157 visits
10 visits saw staff actively discouraging the researcher from joining YourPlay.

Staff often uncertain about sign up, including how to do it, the ID requirements, the availability of casual cards, whether it was possible to join YourPlay without also joining a loyalty scheme etc.



Attempts to join YourPlay at hotels and clubs generally failed.

24 successful attempts.

14 partial successes (card worked but limit not set as requested)

119 failures (58 no card issued, 30 only loyalty card issued, 31 cards issued that did not work).

Evidence that using YourPlay delivers benefits

Survey evidence suggests that those gamblers using YourPlay cards are achieving reasonable rates of benefits:

- 23 to 28 per cent reported being more aware of their expenditure;
- 24 to 29 per cent reported that YourPlay made it easier to stick to the limits they set for themselves

Analysis of expenditure data also shows that expenditure per session when using a YourPlay decreases as the number of sessions increases (except for those users with a very high number of sessions) suggesting that users are better understanding their expenditure patterns and/or better able to stick to whatever limits they set for themselves.



Cost of YourPlay

The most significant costs of YourPlay are the system monitoring fee charged by Intralot (\$7.8 million in 2015/16) and depreciation on card readers on machines (\$4.2 million in 2015/16).

Total present value of costs (including establishment costs) from 2014/15 to 2018/19 is estimated to be **\$57.1 million**.



Cost Effectiveness

Costs were allocated between outcomes based on the Department's benefit realisation plan.

Estimated cost effectiveness of consumer protection benefit of YourPlay: **\$3,942.56 per gambler who is better informed about their spending.**

Estimated cost effectiveness of harm reduction benefits of YourPlay: **\$1,162.55 per gambler who realises at least some reduction in the harm to themselves or others from gambling.**

Conclusion and implications

Whilst YourPlay was effectively implemented and delivers benefits for those using it, usage is very low in hotels and clubs.

Under the current usage rates YourPlay has a poor cost effectiveness.

The low usage of YourPlay is being driven to a significant degree by lack of engagement (whether advertent or inadvertent) on the part of hotels and clubs, their managers and their staff.

If usage is to be increased to a level where YourPlay will have impacts consistent with its costs, then the incentives facing venues and/or gamblers need to be changed. Approaches could include measures such as imposing a cost on those venues achieving low usage rates, stricter enforcement of existing regulations around the implementation of YourPlay, or direct incentives to gamblers to use YourPlay.

Recommendations

Recommendation 1: We recommend that the Department revisit the decision to operate the link with loyalty schemes as an opt-in rather than opt-out.

Recommendation 2: We recommend that the Department works with the Melbourne Casino to explore ways to make the switch of machines to unrestricted mode when YourPlay is being used more transparent to gamblers.

Recommendation 3: We recommend that the Department reviews approaches to achieving better outcomes for gamblers from the use of YourPlay cards in the Melbourne Casino. This could include working with the Melbourne Casino on the script used by casino staff around limit setting to ensure

that it represents best practice in terms of assisting gamblers to set the limits that are right for their personal circumstances.

Recommendation 4: We recommend that in future projects where changes in the behaviour of a segment of the population are required, that a senior and experienced individual be appointed as benefits realisation manager to ensure all efforts to change behaviours and understandings are coordinated, consistent and appropriately targeted.

Recommendation 5: Where widespread awareness and behavioural change are required in order to achieve a projects benefits, the communications strategy should be planned and funded as part of the core project.

Recommendation 6: Good quality management information is critical to support the continuous improvement of projects, and the contract with the primary IT vendor should explicitly identify the nature and quality of information to support the on-going management of the scheme together with the way in which it is to be supplied.

Recommendation 7: The BI team should be required to fix the remaining errors in the BI System.

Recommendation 8: The VCGLR should be encouraged to impose the penalties set out in Section 3.8A.12 Gambling Regulation Act 2003 for those venues that are not compliant with the requirements around pre-commitment equipment. Liquor and Gaming should publicise any penalties imposed to help support the development of a compliance culture amongst venues.

Recommendation 9: Ensure that gaming staff are aware of, and encouraged to use, the on-line training tools related to YourPlay to regularly refresh their skills on the technical aspects of YourPlay such as sign up and encoding cards.

Recommendation 10: Review the communications to venue managers and gaming staff to ensure that the consumer protection elements of YourPlay are being given sufficient promotion.

Recommendation 11: If the Department decides not to switch the link between loyalty schemes and YourPlay from opt in to opt out (recommendation 1) it will be important to ensure that venues are focussed on complying with the requirement to offer YourPlay to those joining loyalty schemes, ideally through compliance checks and enforcement activity.

Recommendation 12: The Department should consider further testing of the promotional materials for YourPlay (mass market and in-venue) to ensure that they accurately convey to gamblers what YourPlay is and who it could help.

Recommendation 13: We recommend that further mass market awareness/promotion campaigns for YourPlay are only undertaken after an assessment of their relative reach with the target audience of EGM gamblers (particularly higher risk and higher frequency gamblers), and relative cost effectiveness of a mass market campaign, compared with other approaches to marketing the scheme.

Recommendation 14: The Department should explore who would be seen as a trusted source of information by EGM gamblers and seek to use them as a channel to increase awareness of YourPlay.

Recommendation 15: The Department should assess the ways in which YourPlay is promoted in venues to ensure that the most effective channels are being used.

Recommendation 16: Review training to ensure consistency of messaging (e.g. emphasis on gamblers' own choices) and to ensure it provides gaming room workers with techniques to support their interactions with gamblers around YourPlay and responsible gambling more generally.

Recommendation 17: Review and market test messaging to try and assuage concerns about government monitoring

Recommendation 18: Explore whether it is possible to structure some of the promotional materials for YourPlay around actual benefits perceived by typical gamblers, for example through testimonials or case studies.

Recommendation 19: Consider removing the requirement to enter a PIN when using the YourPlay card on a gaming machine as expenditure during a session or day presents a low risk of privacy breach, with PINs retained for accessing full history and contact details which are potentially more sensitive.

Recommendation 20: Continue to run YourPlay Days as an important tool for recruiting YourPlay cardholders and building awareness of the scheme.

Recommendation 21: Ensure communications to venues and training of workers emphasises requirement to offer YourPlay when a gambler joins a loyalty program, and audit loyalty materials in venues to make sure they promote YourPlay.

Recommendation 22: Given the widespread range of failures observed in venues around YourPlay sign up, including frequent equipment failure, we recommend that the Department work with the VCGLR to shift from the current ‘collaborative’ approach to regulation to a compliance and enforcement based regulatory model including use of the available penalties for compliance failures until venue practices improve.

Recommendation 23: Develop options to better incentivise use by gamblers and venues.

Executive Summary

E.1 Background

YourPlay

YourPlay (the Victorian pre-commitment scheme for electronic gaming machine gambling) was introduced as part of a broader suite of measures aimed at promoting a responsible, sustainable and transparent gambling industry including the establishment of the Victorian Responsible Gambling Foundation (VRGF) and the Victorian Commission for Gambling and Liquor Regulation (VCGLR). The policy objectives for YourPlay (as approved by the Minister for Consumer Affairs, Gaming and Liquor Regulation) are to:

“minimise harm by providing a tool to assist players to control their gambling and avoid escalating into harmful levels of play by enabling players to:

- access information about their gambling activity; and
- set limits before they start to gamble and assist them to observe those limits”.

It is important to note that the benefits sought from YourPlay are not confined simply to a reduction in harm to gamblers and others, but extends to improving the information provided to all gaming machine gamblers using the scheme and improving decision making of those gamblers (e.g. consumer protection).

The features and functions of YourPlay allow gamblers using the scheme to, *inter alia*:

- obtain a pre-commitment account by registering using their name and selected demographic details, or by obtaining a casual player card (e.g. without the need to register);
- receive updates (via pop-ups on the machine) of their spending within a gambling session in which YourPlay is being used;
- setting time and money limits;
- receive alert messages in relation to their limits (if set);
- continue to track their play after they have reached their limits;
- manage their pre-commitment account in and away from a venue, including on-line; and
- access a ‘live action’ summary of money or time spent, at a gaming machine at any time.

YourPlay also enables:

- player activity statements to be generated;
- the use of pre-commitment without joining a loyalty scheme; and
- any loyalty scheme cards will also be capable of acting as a pre-commitment card in any venue in the state.

This Report

This report represents the final report of the evaluation, consolidating earlier findings around the implementation of the scheme with an assessment of the extent to which the scheme has achieved its targeted outcomes, the costs of delivery, and the cost effectiveness of the scheme.

This report is split into four parts.

Part A details the background to YourPlay’s design and implementation, including its underlying program logic, as well as detailing baseline data.

Part B reviews the implementation of the scheme.

Part C reviews the available evidence regarding those factors that appear to be influencing use of YourPlay by Victorian gaming machine gamblers.

Part D presents estimates of the outcomes of YourPlay, its costs, and the cost effectiveness of achieving those outcomes.

What is YourPlay seeking to achieve?

The program plan for the implementation of YourPlay sets out three broad objectives for the scheme, namely that:

- gamblers make better informed decisions about their gambling activity;
- YourPlay is established as standard venue practice; and
- YourPlay contributes to a reduction to the harm gamblers do to themselves and others.

The second objective established for YourPlay is not an end in itself, but rather an enabling outcome to create the conditions whereby the other two objectives are more likely to be met. As such, whilst progress towards the second objective will be tracked it will be as an intermediate outcome towards achieving the other two objectives.

It is important to note that neither of these objectives are focussed on problem gamblers, but rather are focussed more broadly on addressing the 'consumer protection' issue that gaming machine gamblers often possess imperfect information about their expenditure levels and their own patterns of behaviour around gambling. The aim is to ensure gamblers have the information they need to manage their gambling to whatever limits they set themselves, and to address ways in which gaming machine gamblers develop impaired control whilst gambling; namely, difficulties in being able to resist the urge to keep gambling.

Due to the broader focus of YourPlay, our discussion around reductions in the harms arising from gambling will generally be framed around that population of gamblers who experience some degree of impaired control. This population encompasses not only problem gamblers, but also includes those who fall into the moderate risk and low risk categories, where the intensity of any harms is generally lower.

How does YourPlay operate?

The core of gamblers' experience of the YourPlay system is the YourPlay card that identifies the gambler to the system ensuring that expenditure and time spent gambling is recorded. The YourPlay card also applies any expenditure limit or time limit that the gambler may have set.

YourPlay cards can be obtained from any gaming machine venue, either by registering at the venue, or by pre-registering on-line and collecting the card from a convenient venue (for a registered card) or picking up an anonymous 'casual user' YourPlay card from any gaming venue.

In addition to cards issued specifically for YourPlay, all gaming machine related loyalty cards issued in Victoria can be linked to YourPlay account (including a casual user account) allowing the loyalty card to function as a YourPlay card in any venue in the state including venues not using that particular loyalty scheme.

Whilst the cards can be registered to a person this is not required by the system and most of the core features will operate with a casual user card despite its anonymity.

When first using a card the gambler is required to select a PIN to control access to information at venue based kiosks and for use of the card at a gaming machine.

If a gaming machine gambler chooses to use the YourPlay card to gamble in a particular session they need to insert the card into the card reader attached to the gaming machine and enter the PIN. Data on their play during that session will then be collected by the system, with expenditure and time data able to be retrieved in real time as a live action summary while playing at the gaming machine when pre-commitment has been activated, or retrieved later via reports that can be generated by the player. In addition, any pre-commitment limits on expenditure or time that have been set by the gambler will be applied to that gambling session.

Where limits of time and money have been set, a pop-up message will notify users that they are approaching their limit when they reach 75 per cent and 90 per cent of the limit value. If during play a gambler reaches their pre-set limit, play will be suspended and a message will appear on screen informing them that the limit has been reached and asking if they wish to continue. The player then needs to select 'Stop playing' or 'Continue playing'. If they elect to continue, play will resume, and the player will continue to receive live action summaries on the screen to inform them of the amount by which they have exceeded their limit (whether in time or net expenditure).

Outside/contextual factors likely to impact the ability to achieve outcomes

Working through the two logic models for YourPlay's outcomes, there are several outside or contextual factors that are likely to be critical to YourPlay's prospects for achieving its objectives.

The first is the views held by gaming machine gamblers about YourPlay (and the broader concept of pre-commitment). If gamblers view the use of YourPlay cards as something associated with problem gambling their use is likely to be stigmatised (or at best be seen as something of no relevance to most gamblers) and this could have a significant negative impact on take-up.

Second, venue staff and managers will be one of the most important paths by which YourPlay is promoted and accessed. Their attitudes to the scheme and its potential benefits for their customers is likely to have a significant impact on the way in which they promote the scheme to gamblers in their venue. Equally the resources available to venue staff to promote and implement the scheme will also be crucial in shaping gamblers' attitudes to the scheme.

Finally, in order for the potential benefits of the scheme to be realised, it is important that gamblers persist in using YourPlay long enough to improve their understandings of their own gambling behaviour and ability to stick to whatever limits they have set themselves. A significant factor in determining whether gamblers continue to use it will be the system's ease of use, and the usefulness of its outputs.

E.2 Implementation Review

Key choices made in design and legislation of the scheme

The design of YourPlay, and the approach taken to encoding it in legislation and regulations, was based on several key choices that will be critical in determining YourPlay's effectiveness and impact:

1. Launching the scheme as an entirely voluntary scheme;
2. Not setting any restrictions on the values that could be chosen for the spending limits or the time limits;
3. Allowing anonymous registration (including for those linking their YourPlay card to a loyalty card);
4. Establishing YourPlay as an 'opt-in' for those joining a loyalty scheme, rather than an 'opt-out'.

Impact of legislative development process on implementation

The legislation and regulations generally fit the objectives of the scheme well, although the impact on use of the scheme due to adopting a wholly voluntary approach can only be examined as part of the impact evaluation and should generally have supported the smooth implementation of YourPlay and its take up by gamblers. There are three exceptions to this:

- 1) Structuring the link between YourPlay and loyalty programs as 'opt in' rather than 'opt out' has significantly reduced the potential for loyalty schemes to act as a key feeder of gamblers into YourPlay. And the data from the telephone survey on the proportion of those joining loyalty cards who reported that they were not encouraged to join YourPlay suggests that it is not close to fulfilling its hoped for role as a key pathway into the scheme.

Recommendation 1: We recommend that the Department revisit the decision to operate the link with loyalty schemes as an opt-in rather than opt-out.

- 2) The use of a YourPlay card on which expenditure and time limits have been set (and not exceeded) automatically switches enabled EGMs in the Melbourne Casino into unrestricted mode and therefore disables the other harm minimisation measures (including restrictions on maximum spin rate, maximum bet limit, a ban on autoplay and restricting note acceptors from accepting notes with a denomination above \$50), increasing the risk of harms from gambling to those gamblers without them necessarily having made an explicit choice. (Prior to the introduction of YourPlay it was a requirement that those using EGMs operating in unrestricted mode at the Melbourne Casino were using the Casino's own pre-commitment system with both a time and expenditure limit set, and it is our understanding that this would also automatically switch machines into unrestricted mode, so the current approach represents a continuation of the situation prior to the introduction of YourPlay).

Recommendation 2: We recommend that the Department works with the Melbourne Casino to explore ways to make the switch of machines to unrestricted mode when YourPlay is being used more transparent to gamblers.

- 3) As having YourPlay with limits set (and not exceeded) active on a Crown Rewards loyalty card automatically disables most of the other harm minimisation measures on enabled machines located in the Melbourne Casino the only potential offset for this increase in risk is that the harm minimisation features of the YourPlay card, namely the limit set and the pop-up message every 10 minutes identifying the money and time spend gambling that day. And because the YourPlay system currently places no restrictions on the limit set by gamblers even this element of harm minimisation is frequently not present

with limits set that are too high to be binding, leaving the expenditure tracking pop-ups as the only remaining harm minimisation measure.

Recommendation 3: *We recommend that the Department reviews approaches to achieving better outcomes for gamblers from the use of YourPlay cards in the Melbourne Casino. This could include working with the Melbourne Casino on the script used by casino staff around limit setting to ensure that it represents best practice in terms of assisting gamblers to set the limits that are right for their personal circumstances.*

Impact of scheme governance and management on implementation

What worked well

Generally the structures adopted, and the approaches taken to implementation, have worked very well in terms of supporting the development and implementation of YourPlay. The management structures adopted were well designed and ensured that the relevant senior officials were actively engaged in the development and implementation.

The PIP (pre-commitment implementation project) team also acted proactively and promptly in response to issues that were raised through various external reviews such as the Gateway reviews, feedback from the Industry Advisory Group, and early findings from the evaluation.

The key staff selected for the PIP team (whether it was serendipitous or due to excellent recruiting) not only had the necessary skills in managing complex IT projects, but also had knowledge of the gaming industry, giving them a greater insight into which approaches to program implementation and stakeholder management would be more effective. Indeed the effectiveness of the stakeholder management has been a clear success of the implementation project.

What did not work well

With hindsight it appears that the implementation team was stretched too thin, with all of their resources required to manage the dual tasks of a very complex IT project, and complex stakeholder management.

Given the workload pressure, and cognitive load, on the Project Director in managing the overall project delivery it was not feasible for the Project Director to also be responsible for ensuring that benefits were able to be realised (e.g. that EGM gamblers would use YourPlay in a way that provided them with either consumer protection or harm minimisation benefits). The appointment of a specific, experienced, sufficiently senior, full-time benefit realisation manager would have significantly improved the Scheme's chances of effecting change.

Recommendation 4: *We recommend that in future projects where changes in the behaviour of a segment of the population are required, that a senior and experienced individual be appointed as benefits realisation manager to ensure all efforts to change behaviours and understandings are coordinated, consistent and appropriately targeted.*

The resource constraints facing the implementation project also fed through to the Communications Strategy which was not funded at the same time as the broader implementation program. Whilst the Department of Justice and Community Safety was able to mitigate some of the impact of this by funding an initial, smaller scale, communication strategy from its internal resources, it is likely that the nature and scale of this initial communications activity was different than would have been the case if the communications element of the implementation had been fully funded from the start. And even when funding for the Communications Strategy was released it was somewhat lower than initially requested, resulting in a smaller scale media buy.

Recommendation 5: *Where widespread awareness and behavioural change are required in order to achieve a project's benefits, the communications strategy should be planned and funded as part of the core project.*

Access to high quality and timely management information is an important element of management. Unfortunately this has not been the case for YourPlay. It became apparent soon after launch that the data supplied by Intralot (the firm contracted to manage the overall monitoring system for gaming machines in Victoria as well as the YourPlay system) would not be fit for purpose. The Department then commissioned the development of a management information system for YourPlay. Initially this Business Information (BI) system (based on an Oracle database) was anticipated to be available by mid-2016. However, it was not available until late December 2016, 12 months after launch. It was then discovered that there were a range of flaws in the way in which data was being aggregated and cross tabulated, requiring the system to be extensively revised. As at the preparation of the report in January 2019 (37 months after launch), whilst the performance

of the BI system is significantly improved, these issues have still not been fully resolved and more sophisticated data analysis and extraction (including that required for the evaluation) can still not always be reliably undertaken.

Recommendation 6: Good quality management information is critical to support the continuous improvement of projects, and the contract with the primary IT vendor should explicitly identify the nature and quality of information to support the on-going management of the scheme together with the way in which it is to be supplied.

Recommendation 7: The BI team should be required to fix the remaining errors in the BI System.

Impact of stakeholder management on implementation

In general the stakeholder engagement, particularly through the complex process of preparing venues for launch, has been a success.

Indeed, in many aspects it has been exemplary, particularly the way in which it engaged with its stakeholders both to optimise the technical design of the system and to ensure their awareness of and compliance with, the requirements of the system.

Ultimately the greatest testament to the success of the stakeholder management was that by launch in December 2015 every one of the 503 gaming venues in Victoria had installed compliant technology, staff had appropriate training, and the launch was seamless from a technical perspective. Loyalty schemes were all compatible with the monitoring system, and there have (as at the time of writing this report) been no cases where a loyalty scheme's IT system crashed the Monitoring System in venue.

The stakeholder engagement has been less successful in engendering a sense amongst venue managers and gaming staff as to their role in promoting the scheme and engaging with patrons about it. Venue managers and gaming staff still report uncertainty as to how to engage with patrons around YourPlay, and in some cases report feeling that it isn't their place to promote the scheme to patrons.

The technical implementation process

The *technical* aspects of the implementation, both those directly controlled through the procurement process, and those that needed to be implemented by venues, have been very professionally and effectively executed (with the exception of the management information system).

Within the Department's control

The IT systems required to implement the scheme, both centrally and in venues, were successfully identified and set out in an implementable specification.

The IT system developed to deliver YourPlay has been stable in use.

Outside of the Department's control

Gaming venues understood the technical requirements of the YourPlay system.

Venues acquired the necessary equipment, which met the technical requirements specified by the Department, to support the YourPlay system, and this was installed and operational in all venues by the launch date.

The process of ensuring that loyalty scheme technology would be compatible with the broader system was well designed and executed, and has resulted in a roll-out of loyalty technology that did not interfere with either the Monitoring System or the YourPlay system.

Fundamental to the success in securing technical implementation in those areas outside of the Department's control was the stakeholder management activities of the Pre-commitment Implementation Project (PIP) team.

However, the mystery shopping undertaken as part of this evaluation identified widespread failures of equipment in venues, including card readers on machines, YourPlay cards issued, kiosks, and the equipment used to encode the cards. As Liquor and Gaming has undertaken extensive communication to venues on their obligations regarding pre-commitment equipment it is our view that further communication activities are unlikely to foster effective change amongst venues.

Recommendation 8: The VCGLR should be encouraged to impose the penalties set out in Section 3.8A.12 Gambling Regulation Act 2003 for those venues that are not compliant with the requirements

around pre-commitment equipment. Liquor and Gaming should publicise any penalties imposed to help support the development of a compliance culture amongst venues.

Attitudinal/behavioural change among venue managers and staff

Understanding of YourPlay

Comparing the results of the qualitative research conducted with venue managers and staff in 2016 with that undertaken prior to the launch of the scheme, it appears that the range of misconceptions regarding YourPlay that existed amongst managers and staff have been resolved, a notable success of the stakeholder management and communications activities.

Training (at least on the basis of the scheme and the technical aspects of gaming staff's role in its operation) has been delivered to all relevant staff. However, some staff reported that the low uptake of YourPlay has created difficulties for them in maintaining those skills.

Recommendation 9: Ensure that gaming staff are aware of, and encouraged to use, the on-line training tools related to YourPlay to regularly refresh their skills on the technical aspects of YourPlay such as sign up and encoding cards.

Promotion of YourPlay to gamblers

At the time of undertaking the qualitative research with venues in late 2016, we were not able to find evidence of staff having been trained in how to engage with gamblers to promote YourPlay, and this appears to be a gap in the current skill set of gaming workers. However we note that the Department has introduced measures to try and address this gap, most notably through the YourPlay Ambassador program which was launched in July 2016.

Venue managers and staff were generally very positive about the usefulness of the YourPlay Ambassadors program in the qualitative research undertaken with them in early 2018. However the widespread knowledge gaps and compliance failures identified during the mystery shopping suggest that in many venues this is yet to make an impact.

In October 2016, the Department trialled a new, venue focussed, approach to promoting YourPlay, called YourPlay Day. This is an event held in venues where staff promote YourPlay broadly across patrons in the venue to ensure that anyone approached does not feel singled out or stigmatised. Subsequently, YourPlay Days have been held in April and October 2017 and July 2018. The impact of YourPlay Days is assessed in Chapter 11 of this report.

YourPlay Day appeared to have provided an avenue for staff to overcome the issue with promoting YourPlay as it prompted customers to ask staff questions about YourPlay. Therefore, venue staff, venue managers and venue support workers felt more YourPlay days would be useful, and this may in part address the reluctance of staff to engage with gamblers.

Attitudes to YourPlay

In general venue managers and staff have positive views of YourPlay, with the qualitative research finding that:

- Venue staff and venue managers were positive towards the idea of YourPlay and its potential benefit to gamblers (both at risk and not at risk), but were concerned with the low uptake.
- Venue staff and managers, as well as venue support workers, expressed the view that the pre-commitment scheme was a positive offering in that it gave them something less 'extreme' than self-exclusion to offer people.

However, as evidenced by that last set of attitudes, many gaming managers and gaming room staff appear to be focussed on YourPlay as primarily a harm minimisation tool, rather than a tool that provides both consumer protection and harm minimisation benefits.

It is also possible that these broadly positive views expressed during stakeholder consultations and one on one interviews with gaming managers and staff do not reflect the views being expressed to gamblers. At least one negative comment about YourPlay was made to our researchers on 29 per cent of the 'mystery shopping' visits.

Recommendation 10: Review the communications to venue managers and gaming staff to ensure that the consumer protection elements of YourPlay are being given sufficient promotion.

Perceived barriers to use

In terms of barriers to uptake of YourPlay, managers and staff felt that not at risk gamblers do not believe the scheme is targeted at them; while at risk gamblers do not want to know how much they are spending.

Many venue managers and staff members had no issues with the advertising material (including brochures and posters) and thought that the bright colours grabbed customers' attention. However, some felt that the messaging was not clear, and customers often assumed YourPlay was a new game coming out, or a promotion the venue was running. This lack of clarity as to **what YourPlay is** also arose in the research with gamblers.

Loyalty programmes

Staff reported that they promoted YourPlay to all of those who join their loyalty scheme and agreed that it was a useful pathway to promote YourPlay.

In contrast, the majority of EGM gamblers reported that they had not been offered (or did not remember having been offered) YourPlay when they registered for the loyalty scheme.

The experience of the researchers undertaking the mystery shopping as part of the evaluation (see Chapter 14) was that it was common for venues to offer loyalty programs **without** also offering YourPlay, or to offer YourPlay in a desultory way (for example a check box on the application for which gamblers could tick, but which was neither pointed out nor discussed by venue staff).

Recommendation 11: If the Department decides not to switch the link between loyalty schemes and YourPlay from opt in to opt out (recommendation 1) it will be important to ensure that venues are focussed on complying with the requirement to offer YourPlay to those joining loyalty schemes, ideally through compliance checks and enforcement activity.

Attitudinal/behavioural change - gaming machine gamblers

Attitudes to limit setting and expenditure tracking

The broad concept that gamblers should set themselves limits for their gambling (whether in terms of money or time) and then stick to those limits had broad support amongst EGM gamblers responding to the telephone surveys undertaken as part of this evaluation, and these attitudes have remained fairly constant over the existence of YourPlay.

Actual behaviours differed somewhat from this strong in principle support. When asked how often they set themselves a time limit when playing pokies one half (50 per cent) said that they 'never' set themselves a time limit. Self-reported use of money limits were much more common with three quarters of respondents saying that they 'often or always' set themselves a limit for money.

Awareness of YourPlay

The evaluation of the communication campaign for YourPlay – undertaken after the mass market media campaign had concluded – found awareness of *any* pre-commitment system among regular EGM gamblers in Victoria was only 13 per cent in June 2016 (down slightly from 16 per cent at the October 2015 benchmarking survey prior to the launch of YourPlay, although the difference was not statistically significant). This would seem to suggest that the mass market communications activity did not have a significant impact on the regular EGM gamblers surveyed by Orima.

The results of the two telephone surveys undertaken as part of the overall evaluation of YourPlay (the results of which are presented in Reports 3 and 5 of this evaluation) are somewhat more positive with overall awareness reported to be considerably higher at 37 per cent of EGM gamblers (up slightly from an awareness of 32 per cent at wave 1 in June 2016, although this difference is not statistically significant).

It is also of concern that in the results of the telephone survey reported awareness declined with problem gambling status (whilst 41 per cent of 'no risk' gamblers reported being aware of it, this fell to 31 per cent among low risk gamblers and 34 per cent of moderate risk/problem gamblers).

Our qualitative research with gamblers also found a significant amount of confusion about what YourPlay actually was, with some of those respondents who had indicated that they were aware of YourPlay in their response to the telephone survey believing that it was the name of a loyalty scheme when their awareness was tested during the qualitative research.

Among those who were aware of YourPlay, and knew that it was a pre-commitment scheme, the focus was on the function of setting limits for expenditure, rather than tracking spend and/or setting limits for the amount of time spent.

Recommendation 12: The Department should consider further testing of the promotional materials for YourPlay (mass market and in-venue) to ensure that they accurately convey to gamblers what YourPlay is and who it could help.

These two sets of estimates of awareness (and particularly the lack of change over time) raise questions about the effectiveness of the large scale mass media focussed communications campaigns undertaken for YourPlay to date.

Recommendation 13: We recommend that further mass market awareness/promotion campaigns for YourPlay are only undertaken after an assessment of their relative reach with the target audience of EGM gamblers (particularly higher risk and higher frequency gamblers), and relative cost effectiveness of a mass market campaign, compared with other approaches to marketing the scheme.

None-the-less, there appears to be considerable scope to increase awareness and understanding of YourPlay amongst Victorian EGM gamblers. Not least because 26 per cent of those who reported being aware of Your Play but not having used it, gave their reason as “Haven’t seen/ heard enough about it” (interestingly 18 per cent reported being aware of YourPlay but then when asked why they didn’t use it reported that they were “Unaware of YourPlay/ didn’t know about it”).

Future campaigns may perhaps be more effective if the focus is on delivering messages in venues through trusted intermediaries, and if the communication targets the broader benefits such as tracking spend.

Recommendation 14: The Department should explore who would be seen as a trusted source of information by EGM gamblers and seek to use them as a channel to increase awareness of YourPlay.

Recommendation 15: The Department should assess the ways in which YourPlay is promoted in venues to ensure that the most effective channels are being used.

Attitudes towards YourPlay

In the qualitative research, where their attitudes could be explored in more depth, gamblers were positive, on the whole, about YourPlay and its objectives.

The main barrier to uptake among gamblers was the fact that people did not believe it was aimed at them, or that it was unnecessary or of no use to them. The perceived target audience for the scheme, according to gamblers themselves, was problem and at risk gamblers.

Less frequent, but still present, was a concern that using YourPlay would potentially stigmatise gamblers by flagging up that they had a problem, or that privacy could be breached because other patrons could see their spending because of the pop-up.

Some respondents expressed the view that YourPlay would not be effective for any category of gambler. They did not believe that the scheme would be useful for non-problem/non at risk gamblers, as they felt that they would not use it. They also pointed out that the limit could be over-ridden, or that people could move on and gamble elsewhere, stopping it from being useful for those with a gambling problem (NB YourPlay is not targeting problem gamblers as a population with which it expects to achieve substantial change, due to its entirely voluntary nature making it not well suited to assist problem gamblers alter their behaviour. However the view amongst gamblers consulted was that this cohort was a core focus of the scheme, and that it was not well suited to achieving it).

Use of YourPlay to better understand and manage gambling

The current limitations on the business information system mean that it is not possible at this stage to make strong judgements as to the extent to which EGM gambler behaviours are changing in ways which will result in them better managing their gambling to match their own limits.

However, there are some potentially concerning initial indicators that suggest that YourPlay – if there are no changes to awareness, take up and the way in which YourPlay is used by gamblers – will not be able to achieve its objectives.

At present, rates of adoption, outside of those using the scheme to access unrestricted machines in the Melbourne Casino, are very low in almost all venues. And amongst those who do use YourPlay and have set a spending or time limit (the majority of whom are Melbourne Casino patrons) the limits chosen are frequently too high to be realistically binding. Daily spending limits of more than \$1 million are common.

In the development of YourPlay it was generally agreed by stakeholders, including industry stakeholders that loyalty schemes would be one of the most important drivers of sign-up to YourPlay. And to support this it is a requirement of the relevant regulations that when someone is joining a loyalty program that they be offered YourPlay.

However, with the exception of the Melbourne Casino (where the requirement to have YourPlay with a time or money limit set in order to activate the unrestricted mode on machines creates a different dynamic), loyalty schemes do not appear to have acted as a driver for YourPlay sign-up.

Indeed, amongst the respondents to wave 2 of the telephone survey those who were currently a member of a gambling loyalty or rewards program were significantly more likely to say that they hadn't seen or heard enough about YourPlay (57% compared with 26% overall).

Similar experiences were reported during the qualitative research with gamblers, with all of the participants who were members of loyalty schemes asserting that they had not been informed about YourPlay when joining the loyalty program.

This raises the question as to whether YourPlay is actually being promoted to those joining loyalty programs, and if it is, whether the way in which it is being promoted could be adjusted to better inform gamblers about what YourPlay can offer (see Recommendation 10).

Reasons gamblers gave for not using YourPlay

The most frequent reason given in responses to the second wave of the telephone survey undertaken as part of this evaluation for not using YourPlay amongst those who said they were aware of it, was that they gambled rarely or infrequently (41 per cent). Around one third (34 per cent) of respondents felt that they didn't need it or didn't consider gambling to be a problem, 26 per cent of respondents said that they hadn't seen or heard enough about it and 18 per cent were unaware of YourPlay or didn't know about it. More than one response was allowed.

A potentially interesting finding of the telephone surveys was that from wave 1 (May 2016) to wave 2 (May 2017) there was a big drop in those responding that the reason they hadn't tried YourPlay was "Don't think it would help me", from 25 per cent to 5 per cent. If this is a genuine change in sentiment (rather than just a change in the way in which lack of interest is reported) then it may be that there is more scope now to persuade potential users of its benefits than there was early in the scheme's life.

Gambler views on promotion of YourPlay in venues

A factor which came through strongly in the qualitative work with gamblers, and was also present in responses to the CATI survey was a fear of being 'stigmatised' or seen to be singled out as needing help. Similar views were also expressed by venue managers and gaming staff, and this fear of inadvertently stigmatising their patrons was frequently raised

Liquor and Gaming has introduced a novel marketing strategy known as YourPlay days which involve the system being promoted at gaming venues across the state on the day, with all gamblers targeted. This has the benefit of enabling active recruitment in the venues without creating the potential perception that anyone is being singled out.

E.3 Factors Influencing Usage

Usage of YourPlay

Usage of YourPlay by Victorian electronic gaming machine players is very low, particularly outside of the Melbourne Casino (where the requirement to gamble using a YourPlay Card in order to access unrestricted machines provides both the venue and players with an apparently strong incentive to facilitate use).

Overall statistics on YourPlay usage are shown by venue type for the three full calendar years that YourPlay has operated. Total net player loss and turnover were down sharply in 2018 due to a significant fall in YourPlay expenditure at the Melbourne Casino. Expenditure whilst using YourPlay in both clubs and hotels is higher than it was in 2016 although it still only accounts for a very small share of expenditure.

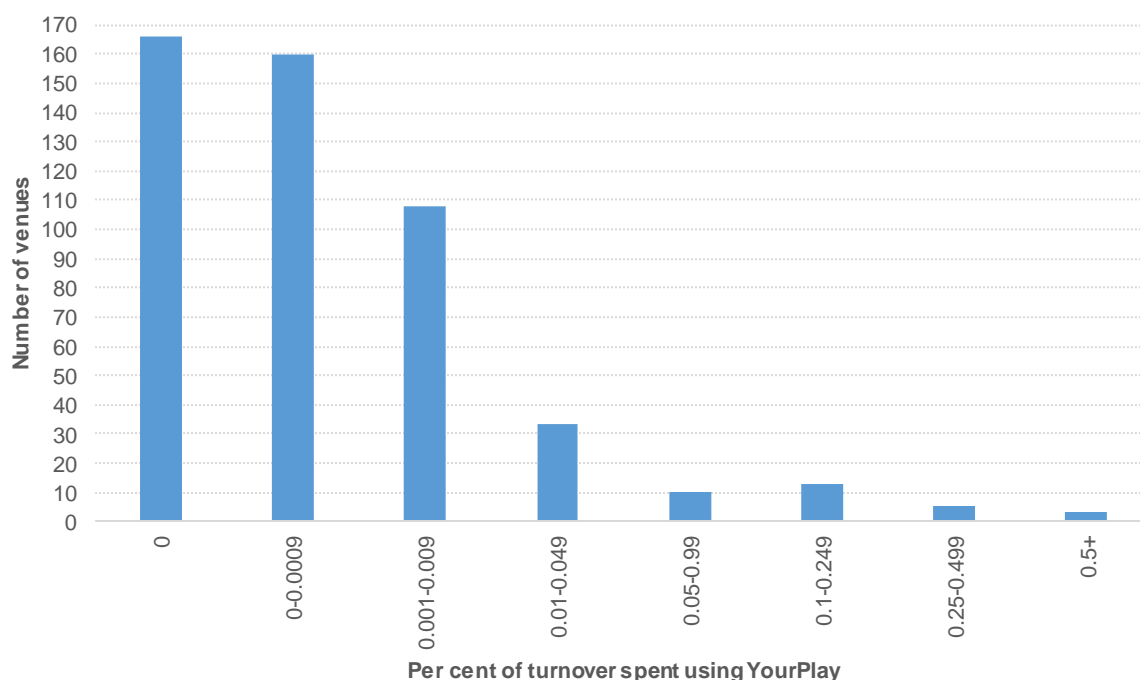
Table E.1 Usage of YourPlay by Venue Type

Year	Indicator	Casino	Club	Hotel
2016	Number of players whose first YourPlay session was in 2016	10,630	2,233	2,721
	Total number of YourPlay sessions in year	2,017,300	21,133	21,954
	Total net player loss whilst YourPlay card in play (\$)	439,175,461	43,259	60,027
	Total gaming machine turnover whilst YourPlay card in play(\$)	4,330,110,001	437,951	570,916
2017	Number of players whose first YourPlay session was in 2017	8,246	2,275	2,950
	Total number of YourPlay sessions in year	2,135,230	33,442	31,469
	Total net player loss whilst YourPlay card in play (\$)	312,935,340	195,231	114,503
	Total gaming machine turnover whilst YourPlay card in play(\$)	3,677,055,162	2,224,756	1,256,517
2018	Number of players whose first YourPlay session was in 2018	8,203	3,453	3,893
	Total number of YourPlay sessions in year	2,216,812	29,503	25,558
	Total net player loss whilst YourPlay card in play (\$)	193,729,652	177,205	168,577
	Total gaming machine turnover whilst YourPlay card in play(\$)	2,289,829,691	1,948,132	1,505,477

Note: Net player loss represents the amount gambled on gaming machines (also known as the turnover) minus the wins of players

The extent to which many hotels and clubs see little or no use of YourPlay cards can be seen in Figure E.1. For a significant majority of Victorian hotels and clubs – 87 per cent – the share of their expenditure made in session where a YourPlay card was in play was less than \$1 in \$10,000 (including 166 of the 498 venues included in the VCGLR data for 2017/18 which had no YourPlay expenditure at all in 2017/18).

Figure E.1 Proportion of venues' turnover spent with a YourPlay card in play, hotels and clubs, 2017/18



There were only 16 venues where more than 0.1 per cent of their turnover was from YourPlay users, and the highest share is 0.8 per cent of turnover. This maximum share of turnover is lower than was the case in 2017, whilst the same venue has retained the status as the best performer, its share of turnover has become less exceptional and more in line with other “high performing” venues.

Limit setting

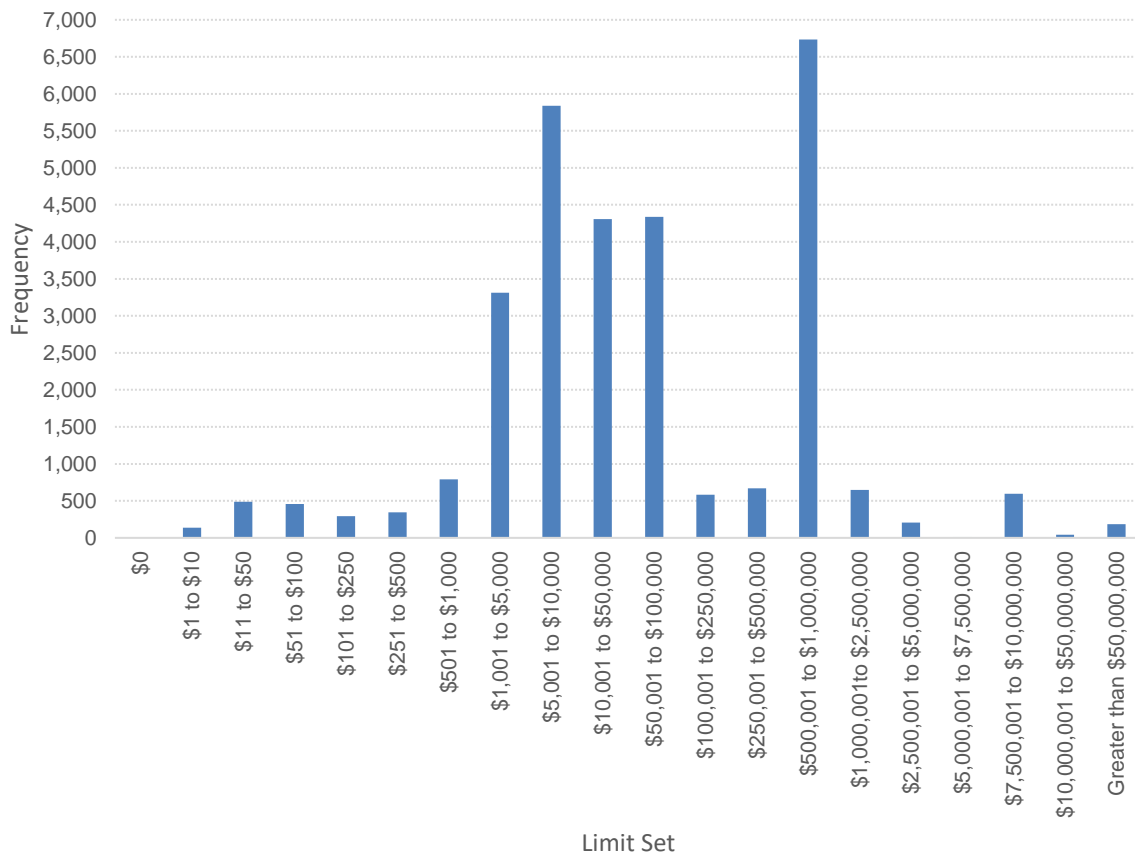
In the design of the system the ability of gamblers, should they choose, to set their own limit for amount of money spent (per day or per week) and time spent gambling was considered to be the most likely route to realising harm reduction. However it was also understood that the voluntary nature of the scheme, together with the ability to override and set limits and keep gambling with the YourPlay card in play, reduced the potential effectiveness of any harm reduction (and it is for these reasons that the system design focuses primarily on consumer protection impacts).

Despite the considerable flexibility built into the limit setting process a significant proportion of those choosing to set limits choose a daily loss limit that is effectively non-binding.

This analysis focuses on the daily loss limit as that is much more common than weekly limits, and includes all of the limits current as at January 2019. The median limit chosen by YourPlay cardholders was \$50,000, however 8,301 of the 29,992 gamblers who set a limit chose a daily loss limit that was \$500,000 or higher. **The most common individual value (also known as the mode) for daily loss limits was \$1,000,000.** The full distribution of limits set is shown in Figure E.2.

This suggests that in practice the limit setting features is unlikely to have much, if any, impact on harm reduction as it will not even be able to fulfil an information provision function (e.g. it is extremely unlikely that these extreme values represent the genuine daily affordable loss limits for all but a few high rollers, and as players are extremely unlikely to actually reach these limits they are not provided with the warnings at 70 per cent and 90 per cent of their limit).

Figure E.2 Distribution of daily loss limits set for YourPlay cards as at January 2019



Review of training for gaming workers

Online training is made available to provide venue workers with details of how YourPlay operates, and this represents the main mechanism for ensuring gaming workers understand YourPlay and have the skill needed to implement it (including promoting it to gamblers).

The training takes the form of a series of short information modules which can be undertaken at the worker's own pace ('self-paced').

To examine the quality and validity of this training, the researcher undertook the training themselves.

On the whole, the information provided in the online training portal appears to be comprehensive and clearly organised.

It was generally easy to follow most of the information. However, some sections required some greater concentration and effort and would probably be difficult to comprehend if viewed on anything other than a large PC screen.

The information is largely factual. There is a lot of information about the purpose of YourPlay, the principles governing its use and what options are available. Much less information, however, is provided regarding the sequencing of information or how it might work in practice. For example, there are no videos or pictorials showing how each process might be undertaken by a specific patron.

The assessment for the course is very short. There are simple multiple choice quizzes at the end of two of the modules and these comprise between 3-5 questions. Each of them is factual in nature and generally does not require very much problem-solving. The researchers felt that this assessment was much too parsimonious and did not really capture very many of the learning areas outlined for each module. A better assessment would contain more like 15 questions and require greater reflection on the material. In actual venue environments, workers are likely to be 'put on the spot' and will need to consider situations that might require some interpretation and problem solving (e.g., Patron A wants to do X, but not Y and would prefer to receive the activity statements in a different way). Some case-studies would have been useful in this context.

The final observation regarding the venue worker training was that interacting with gamblers in a sensitive way around YourPlay is an important part of promoting YourPlay but that the current training **may not prepare staff for this type of interaction**: what language to use; how to frame their responses; and how to deal with more complex queries.

Recommendation 16: Review training to ensure consistency of messaging (e.g. emphasis on gamblers' own choices) and to ensure it provides gaming room workers with techniques to support their interactions with gamblers around YourPlay and responsible gambling more generally.

Venue views on factors driving YourPlay use

Support for concept

Venue managers generally expressed support for YourPlay (not least as a defensive mechanism against other, potentially more intrusive, harm minimisation measures such as mandatory pre-commitment or \$1 maximum bet limits). Gaming room staff were also generally supportive, however there was more variation in their responses from strongly supportive to seeing it as a waste of time and money (in the latter case this was largely driven by concerns about low take up of YourPlay).

YourPlay was seen by most venue managers and gaming room staff as a potentially useful tool for people who want to help themselves. The ability to access information on gambling behaviour was viewed as an important tool to assist all players, and this feature was mentioned more frequently than the ability to set limits. Those interviewed see YourPlay as a feedback tool to reinforce self-control. It is an aid, an incentive to ensure that gambling play remains enjoyable.

But significant doubts about effectiveness given low use

There was universal concern amongst both venue managers and gaming room staff at the low usage of YourPlay, with the tone of the comments varying from enquiries on what could be done to get more people to use it, to the view that with usage so low it was a pointless scheme.

"It has been implemented successfully, but it hasn't been a success" – Venue manager, higher use club

“It’s a great tool if people want to use it, unfortunately it’s really hard to get people to want to use it” – Venue manager, higher use club

“It’s a good idea but in reality it doesn’t work.” – Staff member, low use club

Due to the lack of interest and overall use, YourPlay was viewed by many of the venue managers and gaming room staff as being a waste of money and time. This belief was evident across higher use and low use venues, but more prevalent among the latter.

“It’s a waste of time, as I just don’t really think the customers are interested” – Staff member, higher use club

“The government should spend their money somewhere better... like on counselling problem gamblers” – Venue manager, higher use hotel

“Due to the lack of response, we have no use for it.” – Staff member, low use hotel

Promotion of YourPlay

All venues have substantial promotional material on YourPlay displayed, including extensive wall signage inside and outside the gaming area, signs on machines, pop up displays, pamphlets, electronic kiosks, cashier booths with information, and promotion billboards. Most participate in Ambassador Forum meetings.

Some of those interviewed expressed concern that the promotional materials for YourPlay could get ‘lost in the noise’ of the venue, with nothing seen as distinguishing them from the promotion of gambling products, that the poster don’t actually provide any information about YourPlay and its objectives, and that as the same materials had been used since launch they were now being taken for granted.

“It’s really part of the furniture now, players don’t notice it as much.” – Staff member, low use club

Concerns were also frequently expressed that in venue promotion was the *only* way in which YourPlay was promoted with managers and staff reporting that they had not seen any mass media or social media promotion of the scheme. Many managers and staff felt that the onus has been solely on the venues to make YourPlay work and advertise it, with some expressing concerns that if it doesn’t work the blame will then fall on venues.

Barriers to use

Four broad factors were consistently identified by managers and staff as barriers to getting players to join YourPlay, and sustain their use of it once joined up, these were (in descending order of the frequency with which it was raised):

- concerns about privacy, particularly related to expenditures being monitored by the government;
- a sense amongst gamblers that the scheme does not provide them with any benefits;
- the difficulty of remembering PINs, and frustrations at entering them at the start of each session, has proved a barrier to use being sustained in many venues; and
- the use of cards not yet being normalised, and there being a sense of stigma regarding the use of a card.

Venue managers and gaming room staff consistently reported that privacy is a concern as people “don’t want the government to know anything about them”. A number of venue managers and gaming room staff reported that gamblers in their venue had interpreted “track your play” when YourPlay was being described as referring to the **government** tracking the play of YourPlay users. Concerns were also expressed about the implications of such monitoring for those in receipt of government benefits or for its potential use in tax compliance, with recent media attention around benefit crackdowns by Centrelink such as ‘robodebt’ being mentioned a number of times. This was reported to have sparked significant resistance to the scheme by gamblers. Some venues reported finding use of alternative phrasing such as “monitor your own spend” allayed these concerns amongst some gamblers, however it remained a significant, negative, perception of the scheme. Interestingly, none of the managers or staff reported having actively promoted the use of casual cards in cases where privacy concerns were raised.

Recommendation 17: Review and market test messaging to try and assuage concerns about government monitoring

Second, gamblers seemed to be unconvinced of the benefits of YourPlay, with staff reporting that invitations to join YourPlay were generally rejected along the lines of “what would I get out of it?” or “that’s not for me”. Gamblers seem to associate YourPlay with a need to address gambling problems, rather than to be more

informed about their gambling. And indeed, there also appears to be substantial resistance amongst regular gamblers to receiving any information about their expenditure.

Recommendation 18: Explore whether it is possible to structure some of the promotional materials for YourPlay around actual benefits perceived by typical gamblers, for example through testimonials or case studies.

Third, a number of venues raised PINs as a barrier; not to initial sign up but to maintaining use of YourPlay by gamblers in their venues. Older gamblers were reported to be particularly likely to have difficulties remembering their PIN, and to find the process of entering it each time they gambled difficult. PINs were also reported as a source of frustration amongst those gamblers who preferred to switch machines during their time in the venue due to the need to re-enter the PIN each time.

Recommendation 19: Consider removing the requirement to enter the PIN when using the YourPlay card on a gaming machine as expenditure during a session or day presents a low risk of privacy breach, with PINs retained for accessing full history and contact details which are potentially more sensitive.

Venue factors in higher use

An important issue to emerge from the qualitative research is that there appears to be little correlation between the demographics of a venues' region, or of its patrons, and its (relative) success in achieving use of YourPlay by its gamblers, although there are some indicators of higher levels of resistance to the use of cards and PINs amongst older patrons.

Instead the attitudes, knowledge and skills of the venue managers and gaming staff appear to be the determining factor in take-up and use of YourPlay.

Impact of YourPlay Days

In October 2016 the Department trialled a new, venue focussed, approach to promoting YourPlay, called YourPlay Day. This is an event held in venues where staff promote YourPlay broadly across patrons in the venue to ensure that anyone approached does not feel singled out or stigmatised. On YourPlay Day venues were encouraged to have staff wear themed purple t-shirts, to display promotional material about YourPlay throughout the venue with themed balloons used to attract gamblers' attention, install small displays in prominent parts of the venue, and proactively engage with all patrons around YourPlay throughout the day.

Some venues took this further and attempted a wider range of engagement activities such as handing out cupcakes, offering free soft drinks and snacks, providing small gifts to those who signed up on the day such as branded pens, rostering on more staff for the day, and in a few cases running a prize draw for those who signed up on the day.

YourPlay Days have since been repeated in April and October 2017 and in July 2018.

During consultations with venue workers and managers the response to YourPlay Days was almost universally positive. In particular it appears to have provided an avenue for staff to overcome any reluctance they feel about promoting YourPlay directly to gamblers.

Indeed, many of the venue managers and gaming room staff interviewed expressed the view that when a gambler was joining a loyalty program (for those venues which have a loyalty program) and YourPlay Days are the only times when it is feasible to promote YourPlay to gamblers.

The number of sign-ups on YourPlay Days which are subsequently used in at least one session with gambling expenditure greater than zero, is significantly higher than on the comparator days and this difference is highly statistically significant, confirming that YourPlay Days have a significant impact on sign-ups. Across the four YourPlay Days the average number of cards registered which had at least one session of gambling with non-zero expenditure was 424.3. Across the eight comparison days the average number of cards registered was 16.5.

At its face value this would suggest that YourPlay Days are very effective in increasing registrations, albeit from the very low levels seen on typical days. However, if this relative success has come at the expense of venues seeing YourPlay Days as the *only* means of achieving YourPlay registrations, then at least some of this relative success may have come at the expense of registrations on other days.

It is notable that there is substantial ‘wastage’ in YourPlay sign-ups, and that this is slightly worse on YourPlay Days. As well as the 1,697 sign-ups on YourPlay Days where the card holder went on to undertake at least one session with gambling expenditure, there were an additional 930 sign-ups which were never used in a gambling session with expenditure (35.4 per cent of total sign-ups on YourPlay Days). On the comparator days, as well as the 132 sign-ups with subsequent expenditure there were 36 sign-ups with no subsequent expenditure (21.4 per cent of the total).

Some of this wastage is likely to be gamblers who took a card during a YourPlay Day either to access incentives offered by the venue, or not really knowing what it was, without any specific intention to use it and their one access of the system did not give them enough incentive to change that lack of intention. However, given that wastage rates are still very substantial on the comparison days this data suggests that there is a potentially significant missed opportunity here. Instead it seems likely that some combination of technology failures in the venue, lack of support by venue workers (both barriers noted in the mystery shopping exercise, see Chapter 14), and/or the experience of YourPlay on a machine not meeting gambler’s expectations has stopped this initial card access from converting to use of the scheme. If these barriers were not present then it is conceivable that usage may have been 20 to 25 per cent higher than it is given the observed wastage rates.

Factors Correlated with YourPlay Use in Hotels and Clubs

There is significant variation in the rates of YourPlay use between individual hotels and clubs. In stakeholder consultations undertaken as part of this project, it was not uncommon for venues with low rates of YourPlay usage to ascribe the low use of YourPlay in their venue to the demographics of their region and venue. Analysis was undertaken to explore the regional dimension of these claims to identify what, if anything, is correlated with the intensity of use of YourPlay in Victorian venues at the regional level, and for the few venue specific characteristics that are known.

This analysis had a low explanatory power (explaining around 8 per cent of the variation in usage) **suggesting that the dominant factors influencing usage of YourPlay are venue specific**. It also is notable that the effect size of the individual variables is extremely small with few factors making a difference to monthly expenditure that is greater than \$1,500.

There were few variables whose sign was notable.

First, two machine technology providers – ALH and Token – were correlated (all other factors being equal) with lower average expenditures using a YourPlay card.

Second, higher socioeconomic status areas were correlated with lower utilisation of YourPlay, with highest usage rates in the second lowest decile.

Finally, the turnover of a venue did not have a statistically significant relationship with its turnover using YourPlay cards, even when potentially confounding factors such as the number of gaming machine entitlements and the type of the venue and its location were included.

It is not possible to determine from the available information what these unobserved factors may be, and whether or not they are within the venues’ ability to influence them.

YourPlay Cardholders’ Views on Obtaining and Using YourPlay

A sample of YourPlay users who had provided their contact details and consented to participate in research were surveyed to capture their experiences in accessing and using YourPlay, as well as the impacts of YourPlay on their gambling.

Obtaining and using YourPlay

YourPlay cardholders that are, or were, a member of a gambling loyalty or rewards program were asked whether a staff member offered YourPlay when they signed up for, or renewed, their loyalty card. Of these respondents, 51 per cent indicated they were offered YourPlay when applying for or renewing their loyalty card, while 33 per cent indicated they were not offered YourPlay. The remaining 16 per cent did not know or could not remember if they were offered YourPlay. As gaming venues are legally required to offer YourPlay when signing or renewing a loyal card, the relatively large negative response suggests a high degree of non-compliance with current legislative requirements.

One quarter of respondents were prompted to get a YourPlay card by advertising in a venue (in contrast only 4 per cent reported having been attracted by TV or radio advertising). The next most common forms of prompts after in venue advertising were recommendation by a staff member in the venue (20 per cent), recommendation from a staff member when joining or renewing a loyalty scheme (14 per cent), saw someone else using it (13 per cent), and being signed up on a YourPlay day (12 per cent). Advertising in the venue was consistently the most important prompt across risk levels, with 26 per cent of high-risk gamblers and 37 per cent of moderate risk gamblers identifying it as the reason they took out a card.

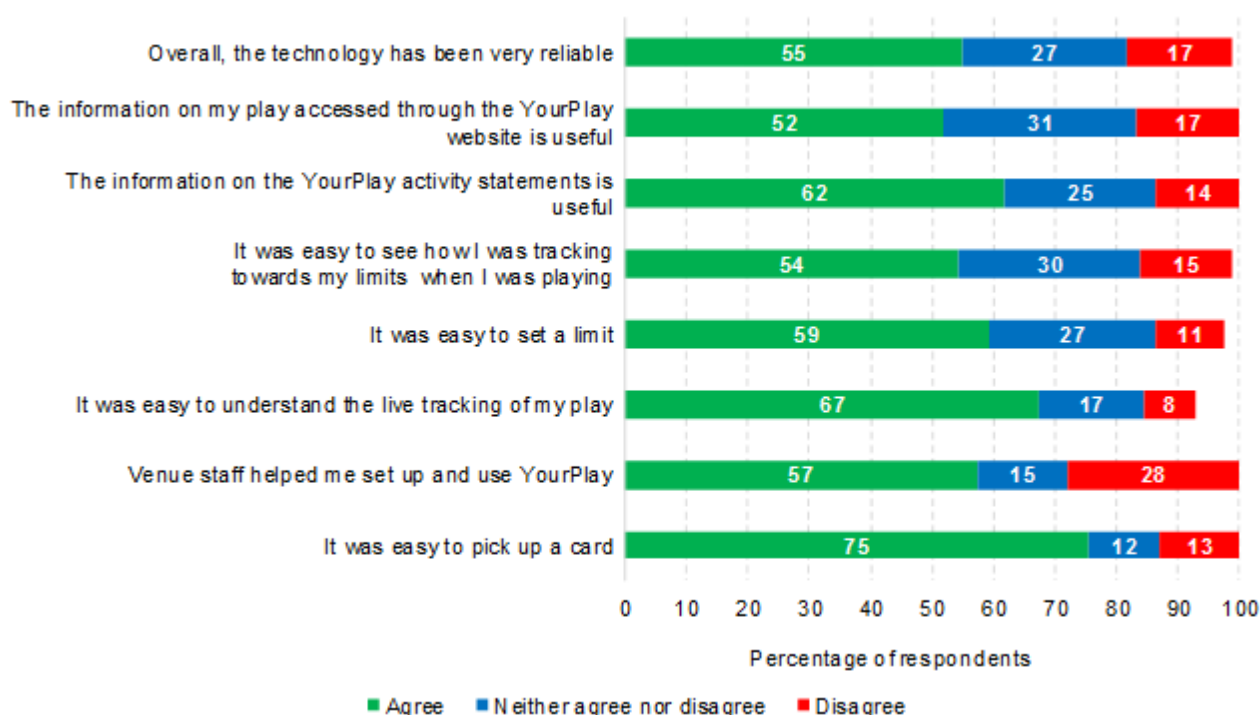
The most frequently identified benefit gamblers hoped for from a YourPlay card was 'better information on the time and money they spend gambling', with 55 per cent of respondents highlighting this potential benefit. The next most common anticipated benefits were 'helping stick to the amount of money they want to spend playing the pokies' (21 per cent), 'getting a better understanding of their gambling by looking at their gambling history' (18 per cent), and 'help avoid gambling problems' (13 per cent). These results indicate that respondents primarily view YourPlay as a useful tool for monitoring and managing their gambling behaviour.

Use of YourPlay

When respondents were asked about how often they used their YourPlay card when gambling, one quarter (26 per cent) stated that they never used it or cancelled the card, while a further 31 per cent said they used it only some of the time. Approximately 27 per cent said that they always used it, while 15 per cent reported using it 'most of the time'.

YourPlay cardholders generally held positive views on the usability of YourPlay (see Figure E.3). The highest level of agreement concerned that it was easy to pick up a card (75 per cent). There were also relatively high agreement in respect of YourPlay making it easy to understand the live tracking of their play (67 per cent) and information on the YourPlay activity statement being useful (62 per cent). The highest level of disagreement was expressed in respect of venue staff helping the individual to set up and use YourPlay (28 per cent disagree). Nonetheless, a majority (57 per cent) of cardholders still agreed that venue staff helped in this respect.

Figure E.3 Agreement with usability of YourPlay, per cent



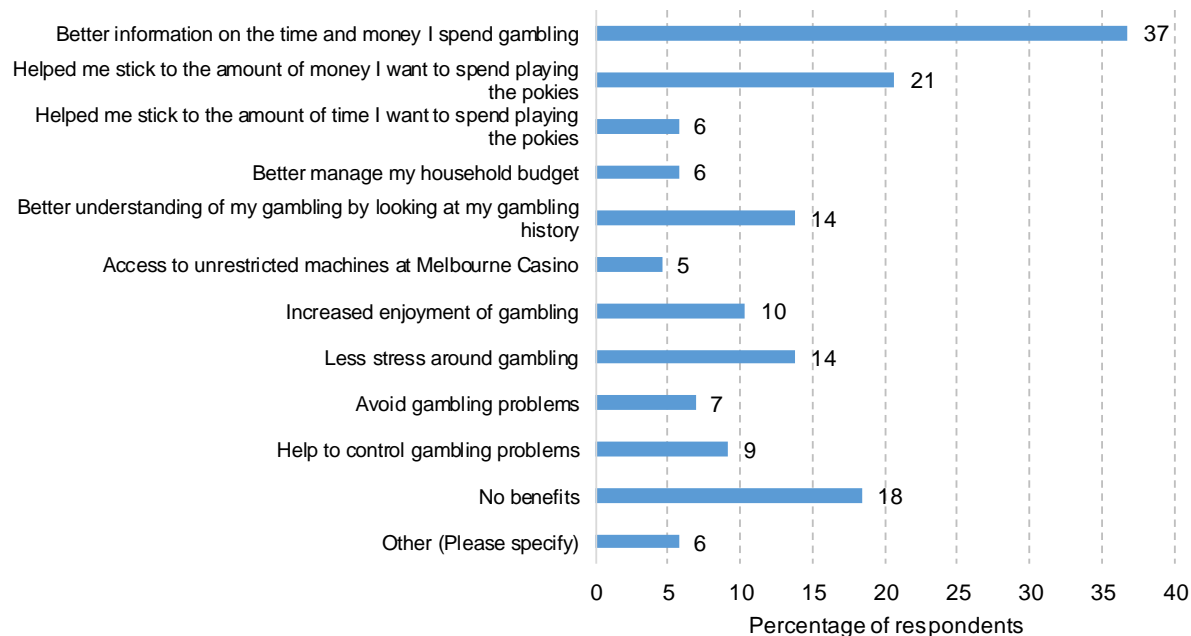
n = 85 respondents

Note: Totals that sum to less than 100 per cent are due to non-responses.

The most popular feature of YourPlay was the 'ability to check their playing history at a kiosk in the venue or on the website', with 35 per cent of respondents choosing this option. The next popular features were the 'regular reminders during play about how much money and time has been spent' (27 per cent); the 'ability to set time and money limits' (18 per cent); and the 'ability to set personalised reminder messages on screen' (17 per cent). A significant proportion of respondents (26 per cent) did not identify any feature, which suggests a degree of ambivalence regarding benefits provided by YourPlay.

Survey participants were also asked to identify the benefits they actually received from using YourPlay. The most common actual benefit identified by respondents (37 per cent) was ‘better information on the time and money they spend gambling’, see Figure E.4. The next most common benefits were helping individuals ‘stick to the amount of money they want to spend’ (21 per cent); ‘experiencing less stress around gambling’ (14 per cent); and ‘getting a better understanding of their gambling by looking at their gambling history’ (14 per cent). The latter reinforces that providing better information on time and money spent gambling is the primary benefit provided by YourPlay. On the other hand, approximately 18 per cent of respondents reported receiving no benefit from using YourPlay.

Figure E.4 Benefits actually received from using YourPlay, respondents could select more than one, per cent



n = 87 respondents

Note: Respondents could provide more than one benefit and so responses will sum to more than 100 per cent.

Respondents who never used YourPlay or have cancelled their card were asked why they discontinued using their YourPlay card. The most common reason for no longer using or cancelling the card was that individuals ‘gambled only rarely or infrequently’, with 16 per cent of those who no longer used or cancelled their card indicating this as a reason. Other common factors were that respondents were ‘not interested in the card or just want to gamble’ (13 per cent), ‘did not find the card useful’ (12 per cent), and ‘no longer gamble in the venue in which I was using it’ (12 per cent).

Concerns about privacy were not common amongst respondents. Four per cent of respondents reported concern about their privacy relating to the government knowing how much money they spend gambling as the reason why they no longer used their YourPlay card, with 3 per cent of respondents reported that concerns about privacy generated by the pop-up messages led them to stop using YourPlay.

One individual indicated that they were discouraged by a venue worker.

‘Other’ reasons were identified by 9 per cent of those who never used or cancelled their card. The reasons given were varied and included that they never received the card, had lost it, “I would use it every time if the staff knew how to log in to their system” and “no longer gamble using the unrestricted machines at Crown Casino”.

Actual Venue Practices – Results of Mystery Shopping

Rationale for mystery shopping

Analysis of the underlying intervention logic of YourPlay has identified venue managers and staff as key intermediaries in facilitating (or frustrating) gamblers’ use of YourPlay. Venue managers and staff have the potential to increase the impact of YourPlay if they increase awareness of it amongst their patrons, and foster positive attitudes and beliefs towards pre-commitment and expenditure monitoring amongst EGM gamblers, promote the use of YourPlay and make the process of joining and using YourPlay as seamless as possible. Alternatively if venue managers and staff hold incorrect beliefs about the operation of YourPlay or its targeted

audience, or if they hold negative views about its use and effectiveness this could significantly reduce uptake and sustained use. Similarly if venue practices or venue technology makes YourPlay difficult to join, or difficult to use, then this is likely to significantly reduce uptake.

The central role of venues is reflected in the behaviours required in regulations, with the *Gambling Regulation 2014 (Pre-commitment and Loyalty Scheme)* requiring amongst other things that all venues display certain promotional materials about YourPlay in their venue, and that if a loyalty scheme is being offered in the venue that gamblers need to be offered YourPlay when they are joining the loyalty scheme.

However there have been conflicting reports about the effectiveness of venue's practices around YourPlay and their compliance with their legislative requirements, with venue managers and staff reporting supportive behaviours, and surveys of gaming machine gambler reporting low rates of engagement by staff around YourPlay.

In order to better understand how YourPlay was actually being experienced by gaming machine gamblers researchers sought to gain information about, and sign up to, YourPlay in a randomly selected group of hotels and clubs. To ensure the experience of the researchers reflected those of typical gamblers the research was not disclosed to venues or staff, however as this was a research rather than a compliance exercise all details of venues have been anonymised prior to analysis.

The objectives of the mystery shopping research were to address the following research questions:

- Do staff and management understand: the objectives, potential benefits, and obligations for supporting YourPlay?
- To what extent do venues meet their obligations in supporting and promoting the scheme?
- What practices and policies do they have in place above and beyond what is required?
- Do management and staff offer to sign up patrons to YourPlay?
- Do management and staff recommend YourPlay to existing loyalty scheme members?
- What are the gaps in knowledge and practice among staff and management in relation to YourPlay?
- What are the staff and management attitudinal barriers in relation to YourPlay?

In particular, given the broad agreement about the potential importance of loyalty schemes in promoting use of YourPlay, the extent to which behaviours of gaming room staff around sign up to loyalty programs meet the obligations set out in the regulations was a particular focus of the research.

Venues selected

A total of 161 mystery shopping visits were undertaken in 80 venues; 50 venues in metropolitan area and 30 in regional areas. Each venue was visited by two different researchers,¹ with the researchers travelling in pairs as a risk management strategy. Where possible researchers entered the venues at different times (typically 20 minutes apart). For venues that were located within close proximity to each other (i.e. inner metro), the researchers went on the same day but visited the venue separately.

Mystery shopping visits

All of the mystery shopping visits were based around the researcher attempting to obtain a YourPlay card with specific spending and time limits set, and then testing that card in the venue to ensure the correct limit had been set. Researchers sought to present themselves as typical patrons to test the actual experiences of those seeking to join YourPlay, and as such did not disclose that they were undertaking research.

Where possible the researchers sought to replicate what we understand to be the most common route to joining YourPlay by initially enquiring with staff about the loyalty scheme (if the venue had one) and then asking about joining YourPlay, or having an existing YourPlay account linked to the loyalty card. However this approach was not feasible in many cases as, for example, once a researcher had joined a venue based loyalty system they could not subsequently join it at another venue using the same system and as such many of the visits targeted joining YourPlay through a casual user account.

Regardless of the specific target for the visit they all followed the same broad pattern to the extent it was feasible.

¹ One venue was visited by 3 researchers.

A typical mystery shop is summarised below:

- Look out for YourPlay material in venue
- If the venue has a loyalty program, ask to join. If the venue does not have a loyalty scheme begin a conversation with staff around gaming to allow YourPlay to be offered.
- If YourPlay is not offered ask a question about YourPlay, ideally referring to visible promotional material as the prompt for the question.
- Ask questions about YourPlay such as ‘What is it?’, ‘How does it work?’, ‘What do I get?’, ‘How do I join?’
- Register for YourPlay or obtain a casual user card.
- Ask the venue worker to set a money limit of \$200 and time limit of 3 hours per week.
- Test the card at the YourPlay kiosk in the venue to check if the card works, and if the requested limit has been set. If the card does not work in the kiosk researchers sought to check it at an EGM where possible.
- Exit the venue and complete the checklist as soon as possible after each visit.

Interactions with venue workers

There were a number of cases where the interactions between gaming room staff and the researchers did not meet the expectations of the program, for example workers only mentioned YourPlay unprompted in 31 per cent of visits where the researcher initially discussed loyalty scheme membership with them, despite such an offer being required by the regulations. At least one negative comment about YourPlay was made to the researchers in 46 of the 157 visits where they were able to interact with gaming room staff, including actively discouraging the researcher from joining in around 10 per cent of the visits. Gaming room workers also often appeared uncertain about other elements of sign up, including how to do it, the ID requirements, the availability of casual cards, whether it was possible to join YourPlay without also joining a loyalty scheme etc.

Recommendation 21: Ensure communications to venues and training of workers emphasises requirement to offer YourPlay when a gambler joins a loyalty program, and audit loyalty materials in venues to make sure they promote YourPlay.

Outcomes of the mystery shopping visits

Of the 157² mystery shopping visits in which it was possible to test whether YourPlay sign up had been successful there were **24 successes (15 per cent)**, defined as a YourPlay card being supplied at the time (or linked to a loyalty card), the card working in the venue, and the requested limit having been set. There were 14 partial successes (9 per cent), where a YourPlay card was supplied and worked, but where the requested limit had not been set. The remaining 119 visits (76 per cent) were unsuccessful for a range of reasons summarised in Table E.3 and set out in more detail in Figures 14.7 to 14.11.

On a *venue* basis (see Table E.2), both visits were successful in 7.4 per cent of ‘lower use’ and 4 per cent of ‘higher use’ venues, or 5 of the 79 venues in which sign-ups could be tested. One of the two visits was successful in a further 14 venues (16.7 per cent of low use venues and 20 per cent of higher use venues). Two thirds of low use venues and 56 per cent of higher use venues achieved neither a success nor a partial success in either of the visits.

Table E.3 summarises the outcomes on a visit basis including the broad reason for unsuccessful visits. Of the 157 visits in which the performance in issuing cards could be assessed there were 24 successes, 14 partial successes and 119 unsuccessful visits. In the unsuccessful visits 31 failed because the YourPlay card supplied would not work in the venue, and 88 failed because the researcher could not obtain a YourPlay card (in 30 cases the venue would only supply a loyalty scheme card, and in 58 cases no card at all was obtained).

² There were 4 visits in which it was not possible to assess outcomes, in 1 case this was because the YourPlay account cancellation had not been processed by the helpline, and in 3 cases the visit was aborted because the researcher was already a member of the venue’s loyalty program from a visit to another venue. Two of these cases occurred in the once venue leading to it being excluded completely from the outcome analysis.

Table E.2 Mystery shop outcomes on a venue basis

	Low use		Higher use		All venues	
	Number	Share of adj. total (%)	Number	Share of adj. total (%)	Number	Share of adj. total (%)
2 visits successful	4	7.4	1	4.0	5	6.3
1 visit successful 1 visit partially successful	2	3.7	2	8.0	4	5.1
1 visit successful 1 visit unsuccessful	7	13.0	3	12.0	10	12.7
2 visits partially successful	2	3.7		0.0	2	2.5
1 visit unsuccessful 1 visit partially successful	3	5.6	3	12.0	6	7.6
1 visit unsuccessful 1 visit excluded	0	0.0	2	8.0	2	2.5
0 visits successful	36	66.7	14	56.0	50	63.3
Both visits to venue excluded	0	n/a	1	n/a	1	n/a
Total without excluded	54		25		79	

Table E.3 Mystery shop outcomes on a visit basis

	Outcome (n=157)	Share of total (%)
Successful: card worked and requested limit set	24	15.3
Partially successful: card worked but limit not set	14	8.9
Unsuccessful: YourPlay card supplied but it did not work	31	19.7
Unsuccessful: No YourPlay card (loyalty card only)	30	19.1
Unsuccessful: No YourPlay card (no card issued)	58	36.9
Total unsuccessful	119	75.8
Total	157	

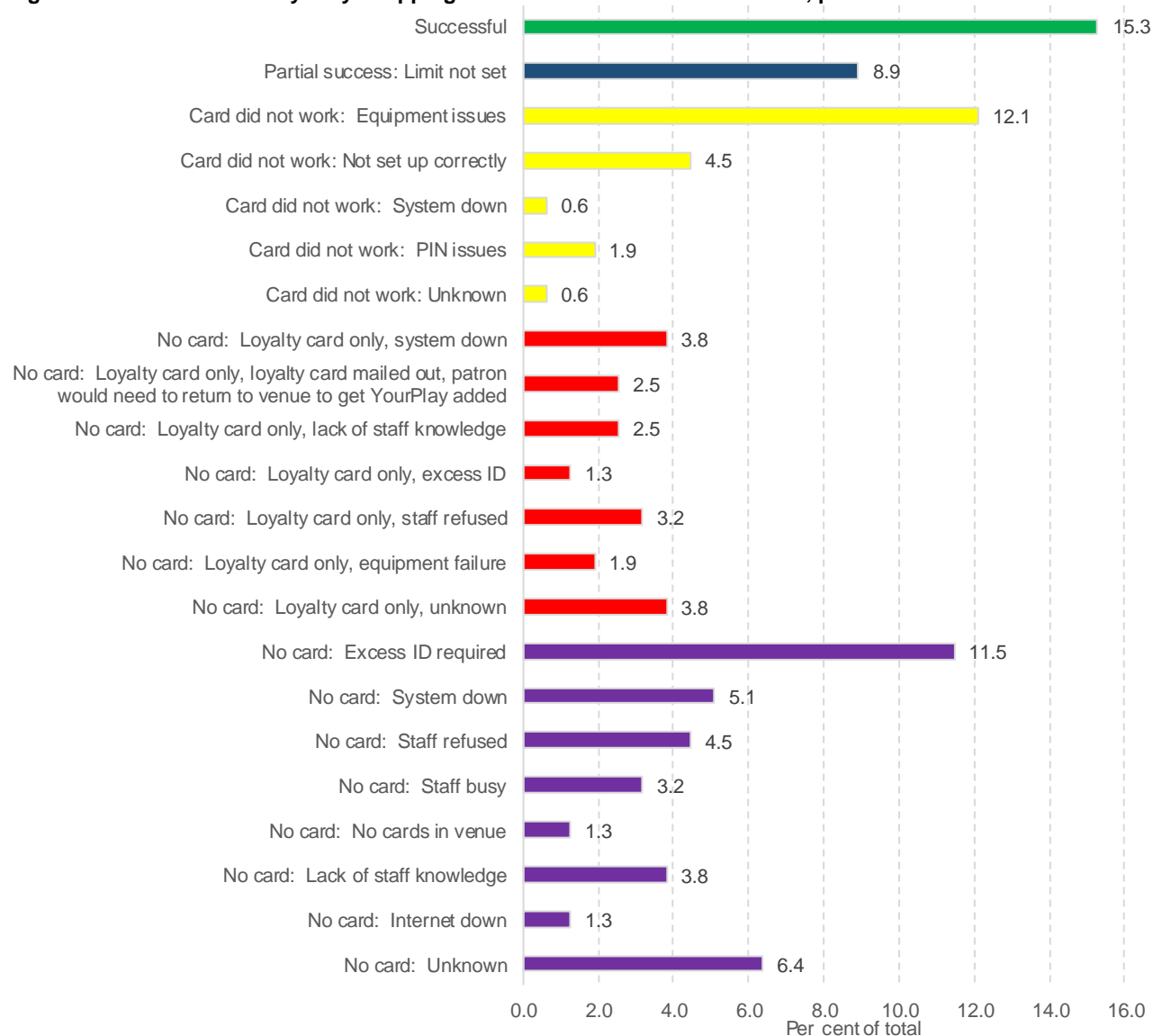
A summary the outcomes of the mystery shopping visits identifying the reasons for unsuccessful visits in more detail is shown in Figure E.5.

Equipment issues as a reason for a failure typically refers to the YourPlay kiosk and the readers on gaming machines in the venue not being able to read the cards, although in some cases it refers to other equipment such as that used by the venue staff to encode the card and set a limit.

Whilst it may be tempting to ascribe the identified problems to “a few bad apples” it should be noted that our sampling was able to test the sign-up practices of 79 of the 495 Victorian hotels and clubs with active gaming machine entitlements as at March 2018, or roughly one venue in six. This means our analysis should be reflective of the sector as a whole (except for venues located more than 3 hours’ drive from Melbourne which were excluded for logistical reasons).

Recommendation 22: Given the widespread range of failures observed in venues around YourPlay sign up, including frequent equipment failure, we recommend that the Department work with the VCGLR to shift from the current ‘collaborative’ approach to regulation to a compliance and enforcement based regulatory model including use of the available penalties for compliance failures until venue practices improve.

Figure E.5 Outcome of mystery shopping and reason for unsuccessful visit, per cent



Note: n=157 as in four visits it was not possible to assess the success in joining YourPlay
 Where the reason for an unsuccessful outcome is listed as 'unknown' this is because the researcher has completed the information in the form on the nature of the unsuccessful outcome but did not complete the free text box explaining *why* the outcome was not achieved.

Limitations of the mystery shopping

There are a number of potential limitations and risks that face a mystery shopping exercise, largely arising from the inevitable subjectivity of only being able to assess a venue’s performance based on two visits to it. The discussion of staff attitudes, staff competence and reasons for unsuccessful visits are likely subject to some degree of subjectivity. This subjectivity does not, however, impact on the overall assessment of outcomes as they are not subjective but verifiable, and whilst the results for individual venues would not necessarily be representative (and are not reported) the results for the sector as a whole are likely to be representative.

As two visits were undertaken to each venue, usually close together in time, the findings would not necessarily be a reliable indicator of the average performance of any individual venue, and they are not intended as such. However the overall sample size of 161 visits was in most cases sufficient to distinguish statistically significant differences between key variables such as venue type and broad location. And visits were distributed widely across all seven days of the week and with start times that ranged from 9AM to 6PM.

Venues located more than 3 hours from the Melbourne CBD were excluded from our sample frame. This meant that 82 venues were included in the sample frame (from which 30 were selected) and 73 regional venues were excluded. To the extent that the excluded venues located in more remote areas of Victoria differ systematically from the performance of the included regional venues that were included in our sample frame then our analysis may overstate or understate the relative performance of this type of venue.

E.4 Impact and Cost Effectiveness

Impact of YourPlay on Gambling

The potential impacts of YourPlay on the targeted outcomes were assessed from the survey of YourPlay cardholders and from analysis of session data extracted from the BI System.

Survey findings

Amongst the respondents to the survey, there was clear evidence that using YourPlay had a positive impact both in terms of consumer protection outcomes and (somewhat less clear) harm minimisation.

All of these results should be read with a degree of caution as it is not possible to identify whether or not the respondents to the survey were representative of the broader population of YourPlay cardholders, as a demographic profile of YourPlay cardholders does not exist.

Twenty eight per cent of respondents who answered the question on impact reported that YourPlay meant they were “a great deal” or “quite a lot” better informed about their gaming machine spending, and 29 per cent reported that using YourPlay meant that it was “a great deal” or “quite a lot” easier for them to stick to the limits that they set for themselves.

Even if it were assumed that the 16 per cent of survey respondents who did not complete the impact questions had experienced no benefits from YourPlay this would still mean that 23 per cent were better informed about their gambling, and 24 per cent had found it easier to stick to the limits they set themselves.

Using the estimates that exclude non-respondents in calculating impact effectively assumes that those who did not complete the impact section of the questionnaire had an average impact equal to that of respondents. Using the estimates that include non-respondents effectively assumes that none of them received any benefit.

It is not clear from the available data which assumption is more likely to be correct. For the purposes of this analysis we have taken the conservative approach of assuming that those survey respondents not completing the impact section of the survey had not received any benefits from YourPlay.

The reported impact on net spending was equally positive, with a **net 4** per cent of respondents reporting that they had been able to reduce their gaming expenditure by 1 to 10 per cent using YourPlay³; a **net 4** per cent reported that they had been able to reduce their expenditure by between 11 to 20 per cent; and a **net 18** per cent of respondents reported that they had been able to reduce their expenditure by more than 20 per cent.

Even if to be conservative it was assumed that those not completing the impacts section of the survey had received no expenditure reduction benefit then this would still be 3 per cent, 3 per cent and 15 per cent respectively of YourPlay cardholders receiving the benefit.

Reported impacts were much more common amongst those classified as problem gamblers or moderate risk gamblers than amongst low risk gamblers or non-problem gamblers, which suggests that much of the expenditure reduction benefit is a harm minimisation benefit rather than a consumer protection benefit.

It is possible to convert these reported impacts into an estimated average reduction of spending for YourPlay cardholders. Assuming that the actual impact was at the mid-point of the ranges (and assuming that >20 per cent averages a 25 per cent reduction), and using the distribution of impacts and annual average gaming spending by gambler risk level allows the calculation of a weighted average spending reduction. For the purposes of this analysis it was assumed that gamblers who did not complete the impact section of the questionnaire received no benefits from YourPlay.

Combining these parameters gives a **weighted annual benefit per YourPlay cardholder of \$1,960.71** from reduced gaming expenditure to more closely meet spending preferences. (Problem gamblers and moderate risk gamblers have an average benefit of \$3,479.35 and low risk gamblers, non-problem gamblers and those who did not complete the PGSI questions have an average benefit of \$27.90.)

The extent to which this average impact from the survey sample can be applied to YourPlay cardholders as a whole will depend on how representative the survey results are of the overall population of YourPlay cardholders. Whilst our sample had a significantly higher proportion of problem gamblers than the overall

³ In this context the net impact refers to the proportion of respondents indicating that they have reduced expenditure by the category value minus the proportion indicating that they have increased expenditure by this amount. So the 6 per cent of respondents who indicated their expenditure fell by 1 to 10 per cent minus the 2 per cent of respondents who indicated that their expenditure increased as a result of YourPlay gives a **net** change of -4 per cent.

population of gaming machine gamblers, the proportions by risk level are roughly in line with those who gamble at least once per week. If the overall population of YourPlay cardholders has a risk profile in line with gaming machine gamblers as a whole then our estimates will overstate the potential impact, however if the risk profile matches that of weekly gamblers then our estimates are likely to be broadly representative.

It is also worth noting that survey respondents whose most common location for gaming was the Melbourne Casino reported slightly lower average impacts, for example the weighted average reduction in spending amongst problem gamblers and moderate risk gamblers who gambled at the Melbourne Casino was 5.4 per cent, whereas for those who gambled at hotels and clubs the average impact was 6.3 per cent. This difference should be treated with a degree of caution as the small sample sizes involved means that the apparent difference could simply be random variation amongst responses rather than a real underlying difference.

Evidence for Impact in YourPlay Data

As an alternative approach to identifying the potential impact of YourPlay on its users we have undertaken analysis of gambling sessions undertaken whilst using a YourPlay card to test whether, over time, gambler's behaviours during the session change.

There are a number of limitations to this type of analysis, largely due to the voluntary nature of the scheme, the fact that most cards are anonymous and so demographic information on the player is not available for most sessions, and the scheme's low usage rates. Another important gap is that it is not possible to know what a player is doing in gambling sessions where they do not use the YourPlay card, or which players continue to gamble after they remove the card.

Two potential benefits of the scheme were tested, first whether gambler's turnover falls after having used YourPlay for a number of previous sessions (this would indicate that they were using the expenditure data to better manage their expenditure based on their own preferences); and whether the ratio of turnover to net gaming revenue changes with use of the scheme. This latter form of benefit was not identified in the data analysis.

Other forms of benefit observed in the Nova Scotia pre-commitment system, such as increased cash out rates could not be assessed in Victoria as the Melbourne Casino does not report this data on sessions that take place in the casino.

In these analyses the "learning" variable is the total number of sessions a player has had up to that point, e.g. the second time a card is used the session count is coded as 2, the tenth time as 10 etc. If players are indeed learning from the information available through YourPlay then it would be expected that, all other things being equal, expenditure would fall as the session count increases.

It may not be the case that the influence of the session count is purely linear. For example it could be that the first set of sessions provides a gambler with information that allows them to better manage their gambling to fit in with their budget and preferences, and after that the gambling behaviour settles in to a new equilibrium with additional sessions producing little or no change in expenditure. In order to allow for the potential for non-linear impacts of session counts, the variable was included in the analysis as a quadratic (this allows the impact to take non-linear forms, such as diminishing returns or exponential growth).

In the regression results the session count for a player (e.g. the number of sessions they have had up to and including the current session) is negative with the squared term positive, and this relationship is strongly statistically significant.

This suggests that the impact will not be consistent across the observed number of sessions in the dataset. In fact the impact of session count on turnover is characterised by a U shaped curve, with the greatest impact on turnover reached at between 3,755 and 3,763 sessions, when the impact of the session count all other factors being equal is to reduce turnover in the session by -\$1,554.03.

If the session count variable is set at its median value (252) the session count reduces expected turnover by -\$201.40 all other things being equal. If the session count variable is set at its average value (490.8), the session count reduces expected turnover in the session by -\$378.85.

Cost Effectiveness Analysis

Treatment of benefits from YourPlay

The approach to benefits is slightly more difficult than normal for this evaluation as the scheme is targeting two broad types of outcomes. Accordingly, the costs need to be allocated between the two broad outcome types in some way. There is no strong a-priori reason to use any particular weighting and so any choice is in some sense arbitrary. In the evaluation planning process in consultation with the Department it was decided to draw on the Benefits Realisation Plan developed for the scheme (p. 16) and allocate 6/7ths of the costs to outcomes around “better informed decisions” (e.g. consumer protection) and 1/7th to outcomes around reduced harms to self and others reflecting the scheme’s primary focus on consumer protection.

Originally the planned definitions for these outcomes was:

- consumer protection: the proportion of total expenditure where the gambler made use of the scheme to manage their gambling, defined as the share of expenditure when a pre-commitment card has been used for the session multiplied by the proportion of YourPlay cardholders who report that they have either used the expenditure tracking system to manage their gambling, or have set a limit to help manage their gambling (with the latter two measures expected to be obtained through the telephone survey).
- reduced harms to self and others: the number of gamblers using the pre-commitment scheme to manage their gambling whose welfare increases relative to non-users will be used as the indicator in the fall in harm (if this change is statistically significant).

These approaches to defining outcomes proved not to be feasible in practice, as the telephone surveys identified almost no users of YourPlay cards precluding their use in identifying benefits.

However, the survey of YourPlay cardholders did provide an estimate of the proportion of YourPlay cardholders who reported that they were better informed about their gambling expenditure and the proportion who reported that using YourPlay had helped them to stop gambling when they had reached the limits they had set themselves. These estimates will be combined with data on the number of active cardholders to derive estimates of the number of persons receiving consumer protection and harm reduction benefits.

Whilst this is the best available data on the share of YourPlay cardholders who benefited from YourPlay, as noted earlier it is not possible to identify whether or not the survey respondents are representative of the broader population of cardholders.

Cost of YourPlay

Data on the key cost parameters was provided by Liquor and Gaming, and these have been allocated across the first five years of the Scheme’s operations by SACES.

The most significant cost is the pre-commitment system fee payable by venues to Intralot Gaming Services. This fee was initially \$0.745 per gaming machine entitlement per day (assuming 28,700 active machine entitlements) and from August 2016 it is indexed annually based on the change in CPI. This fee is only payable from 1 December 2015 when the system went live.

The cost of card readers for gaming machines is estimated by OLG to be \$1,500 each, and one is required for each of the 27,372 active machines. Costs were not included for machines installed in venues that would have had a venue loyalty system even if YourPlay had not been launched, as these venues would have had to purchase card readers anyway. Excluded venues are Melbourne Casino, venues owned by ALH Group and RSLs. For other venues cost is included as depreciation over the estimated five year effective life using a straight line depreciation approach (i.e. 20 per cent per year).

A similar approach was adopted for venue kiosks, with an estimated unit cost of \$2,500 and an estimated 600 installed in venues. It was assumed that the venues excluded from this part of the cost calculation had the same share of kiosks as gaming machines with that proportion of costs excluded.

Costs of staff time for undertaking the on-line training on YourPlay could not be quantified as Intralot does not collect data on the number of persons using the training.

Drawing together all of the included cost items suggests that the present value of costs in 2014/15 values over the five years is \$57.1 million (from total current price costs of \$67.2 million). The majority of these costs (with a present value of \$49.7 million) are borne by industry, largely through the pre-commitment system fee and the cost of card readers.

Cost effectiveness of achieving consumer protection benefits

Assuming (in order to be conservative) that those survey respondents who did not complete the impact section of the questionnaire received no benefits from the scheme, twenty three per cent of respondents reported that YourPlay meant they were “a great deal” or “quite a lot” better informed about their gaming machine spending.

To the extent that our survey of cardholders is representative of the broader population of YourPlay card users then this is a reasonable estimate of the proportion of cardholders who realise consumer protection benefits (see Table E.4)

Applying the weighting from the benefit realisation plan suggests that in net present value (NPV) terms \$49.0 million in costs should be allocated to the consumer protection benefits.

This gives an average cost effectiveness over the four years of \$3,942.56 per gambler who is better informed about their spending. Whilst the most significant factor in this unit cost is the low usage, it is also pushed up by the allocation of a large proportion of costs to consumer protection given that consumer protection was the main focus of the scheme as designed.

Table E.4 Estimated cost effectiveness of consumer protection benefit of YourPlay

	2015/16	2016/17	2017/18	2018/19
Estimated number of gamblers better informed about their gaming expenditure	2,168.0	3,341.3	3,337.3	3,576.3
Total over 5 years	12,422.9			
NPV of costs allocated to consumer protection (\$)	48,977,876.73			
Cost per gambler better informed about spending (\$)	3,942.56			

Whilst there is not a direct comparator available for this cost per unit outcome it appears to be extremely high for a benefit based around improved information on spending.

Cost effectiveness of achieving harm reduction benefits

Assuming that those survey respondents who did not complete the impact section of the questionnaire received no benefits from the scheme, and that harm reduction benefits are only realised by those whose gambling risk is categorised as ‘problem gambling’ or ‘moderate risk gambling’, then 13 per cent of our survey sample experienced a harm reduction benefit in terms of being assisted to stop gambling when they chose.

To the extent that our survey of cardholders is representative of the broader population of YourPlay card users (and whilst the risk levels are not representative of gaming machine gamblers in Victoria as a whole, they are in terms of weekly gamblers who represent the population most likely to use YourPlay) then this is a reasonable estimate of the proportion of cardholders who realise harm reduction benefits. Table E.5 details the estimated number of gamblers experiencing a harm reduction benefit.

Applying the weighting from the benefit realisation plan suggests that in NPV terms \$8.2 million in costs should be allocated to the harm reduction benefits.

This gives an average cost effectiveness over the four years of \$1,162.55 per gambler who realises at least some reduction in the harm to themselves or others from gambling through the use of YourPlay.

Table E.5 Estimated cost effectiveness of harm reduction benefits of YourPlay

	2015/16	2016/17	2017/18	2018/19
Estimated number of EGM gamblers better able to stop gambling at the time of their choosing	1,225.4	1,888.6	1,886.3	2,021.4
Total over 5 years	7,021.6			
NPV of costs allocated to consumer protection (\$)	8,162,979.46			
Cost per gambler better informed about spending (\$)	1,162.55			

Implications and Conclusion

The available evidence suggests that those gamblers using YourPlay cards are achieving reasonable rates of benefits in terms of both consumer protection (23 to 28 per cent report being more aware of their expenditure) and harm reduction (24 to 29 per cent of survey respondents reported that YourPlay made it easier to stick to the limits they set for themselves, and 13 per cent of survey respondents who were problem gamblers or moderate risk gamblers reported that YourPlay helped them “a lot” to stop gambling when they wanted to). These survey responses were supported by analysis of the YourPlay sessions data which showed that as the number of sessions using YourPlay increased turnover per session fell.

However, usage of YourPlay is very low, even allowing for the fact that usage was expected to be low given the voluntary nature of the scheme, and that venue based loyalty cards were uncommon in Victoria (outside of the Melbourne Casino).

Under the current usage rates YourPlay has a poor cost effectiveness.

Usage is also highly variable between hotels and clubs, with a small group able to achieve almost acceptable usage for a voluntary scheme (0.5 per cent to 1 per cent of turnover in the venue spent by those using YourPlay), but the overwhelming majority of hotels and clubs have either no YourPlay use or almost no YourPlay use in a typical month. Ideally across Victorian venues you would hope to see YourPlay cards in play for sessions accounting for at least 2 to 5 per cent of turnover.

The mystery shopping visits clearly show that non-compliance with the regulations around promoting and assisting gamblers to join YourPlay were extremely widespread, with an overwhelming majority of venues visited unable to successfully sign gamblers up to YourPlay and then have the card work in the venue with the requested limit set.

There was a wide variety of causes for the non-compliance ranging from poor staff training, through to poor quality equipment (e.g. in 22 of the 157 visits failed due to equipment issues, with a further 19 of the 157 failing due to staff reporting that either the system was down or the internet was down⁴). However there were also cases where venues appeared to have established policies that were in clear contravention of the scheme’s regulations such as only assisting gamblers to join YourPlay if they also joined the venue’s loyalty scheme, or requiring ID for casual user cards. Twelve of the 157 visits failed as staff refused to join the researcher to YourPlay, and a further 24 failed due to venues demanding excessive identification (including six cases where the proof of address and identity demanded was more stringent for YourPlay than for joining the venue’s loyalty scheme).

This suggests that the low usage of YourPlay is being driven to a significant degree by lack of engagement (whether advertent or inadvertent) on the part of venues, their managers and their staff.

If usage is to be increased to a level where YourPlay will have impacts consistent with its costs, then the incentives facing venues and/or gamblers need to be changed. Approaches could include measures such as imposing a cost on those venues achieving low usage rates, stricter enforcement of existing regulations around the implementation of YourPlay, or direct incentives to gamblers to use YourPlay.

Recommendation 23: Develop options to better incentivise use by gamblers and venues.

⁴ The researchers were not able to verify whether this explanation was correct.

Acknowledgements

We would like to acknowledge all of those who generously gave their time to participate in the primary research on which this report draws, in particular:

- The members of the Victorian community who responded to the 2014 Victorian Gambling Survey.
- Those Victorian EGM gamblers who participated in one or both of our telephone surveys.
- Those Victorian EGM gamblers who participated in our qualitative research.
- Those YourPlay cardholders who responded to our survey of cardholders.
- Those venue managers and gaming staff who participated in our qualitative research.
- Key stakeholders in the gaming industry and in community organisations who participated in consultations as part of Stage 1 of the Evaluation.

Sarah Hare of Schottler Consulting for providing the contact details used in the telephone surveys, and the results for EGM gamblers of the 2014 Victorian Gambling Survey.

Staff of Intralot Gaming Systems who demonstrated the YourPlay system in use and helped us to understand how it would be used in venues.

Members of the Gateway review team for the PIP, whose insights have been drawn on in this review of implementation.

Last, but not least, all of the staff of Liquor and Gaming who have supported us in undertaking the evaluation through their insights, the provision of documentation and data, providing connections to stakeholders and a range of other support.

Glossary of Terms

ACT	Australian Capital Territory
ATMs	Automated Teller Machines
CATI	Computer Assisted Telephone Interviewing
EFTPOS	Electronic Funds Transfer at Point Of Sale
EGMs	Electronic Gaming Machines
Intralot	Also known as Intralot Gaming Services, the firm with responsibility for managing the overall gaming monitoring system, as well as for managing the YourPlay system
IT	Information Technology
KI	Key Informant
Liquor and Gaming	Business unit within the Department of Justice and Community Safety which has responsibility for managing gaming policy including YourPlay (formerly known as the Office of Liquor, Gaming and Racing)
NGR	Net gaming revenue, that is total expenditure on the machine minus any wins
PGSI	Problem Gambling Severity Index, the most common approach to assessing the degree of risk in gambling in population surveys
PIN	Personal Identification Number
PIP	Pre-commitment Implementation Project
RGD	Responsible Gaming Device
RSL	Returned and Services League
SACES	South Australian Centre for Economic Studies
SQL	Structured Query Language
VCGLR	Victorian Commission for Gambling and Liquor Regulation
VGS	Victorian Gambling Screen
VLT	Video Lottery Terminal
VRGF	Victorian Responsible Gambling Foundation

Data sources drawn on for this report

The following sources of information were drawn on in undertaking this evaluation:

A range of program documentation provided by the Department of Justice and Community Safety to facilitate the implementation review.

Reviews of the relevant literature.

The reports of the Gateway Reviews into the PIP.

Stakeholder consultations undertaken by the research team.

The results of the 2014 Victorian Gambling Survey undertaken by Schottler Consulting.

The results of qualitative research undertaken as part of this evaluation with EGM gamblers, venue managers and venue staff in May 2014 and November and December 2016, and a final set of qualitative research with venue managers and venue staff in March and April 2018.

The results of the two telephone surveys undertaken as part of the evaluation in May 2016 and May 2017.

The 2016 YourPlay Communication Campaign, Quantitative Campaign Effectiveness, Research, prepared for the Department by ORIMA research.

The survey of YourPlay cardholders undertaken in early 2018.

Mystery shopping, in which researchers sought to sign-up to YourPlay at hotels and clubs.

Analysis of the anonymised data collected on use of YourPlay cards.

Data on the costs of implementing the scheme, and its on-going running costs provided by Liquor and Gaming.

1. Introduction

1.1 YourPlay

YourPlay (the Victorian EGM gambling pre-commitment scheme) was introduced as part of a broader suite of measures aimed at promoting a responsible, sustainable and transparent gambling industry, including the establishment of the Victorian Responsible Gambling Foundation (VRGF) and the Victorian Commission for Gambling and Liquor Regulation (VCGLR). The initial policy objectives for YourPlay (as approved by the Minister for Consumer Affairs, Gaming and Liquor Regulation) were to:

“minimise harm by providing a tool to assist players to control their gambling and avoid escalating into harmful levels of play by enabling players to:

- access information about their gambling activity; and
- set limits before they start to gamble and assist them to observe those limits”.

The benefits sought from YourPlay are not confined to a reduction in harm to gamblers and others, but extend to improving the information provided to all gaming machine gamblers using the scheme and improving decision making of those gamblers (e.g. consumer protection).

This means that, in contrast to many existing pre-commitment schemes, YourPlay is targeting all gaming machine gamblers, rather than just those with impaired control.

The objectives of YourPlay were subsequently refined to be:

- 1 Gamblers make better-informed decisions about their gambling (the consumer protection objective);
- 2 Pre-commitment is established as standard venue practice (an intermediate objective supporting the delivery of the other two objectives); and
- 3 Pre-commitment contributes to reduction in the harm gamblers do to themselves and others (the harm minimisation objective, expected to be a long term change).

YourPlay is intended to act as a consumer protection measure by providing all gaming machine gamblers with information and tools to assist them to budget their time and money when using gaming machines in a way that maximises their welfare.

YourPlay is intended to act as a harm minimisation measure by providing the tools to help gamblers with impaired control to better manage their gambling and, as a consequence, to reduce the harm that gambling can do to themselves and others. It is also hoped that improved access to information on spending patterns, together with the limit setting capabilities of the pre-commitment scheme, may reduce the flows into problem gambling by assisting some low risk gamblers to prevent their impaired control from escalating into problem gambling.

The features and functions of YourPlay allow gamblers using the scheme to, *inter alia*:

- obtain a pre-commitment account by registering using their name and address or by obtaining a casual player card (e.g. without the need to register);
- receive updates (via regular pop-ups on the machine) of their spending and time spent within a gambling session in which YourPlay is being used;
- setting time and money limits;
- receive alert messages in relation to their limits (if set);
- continue to track their play after they have reached their limits;
- manage their pre-commitment account in and away from a venue, including on-line;
- access a ‘live action’ summary of money or time spent, at a gaming machine at any time; and
- generate player activity statements of all gambling undertaken when the YourPlay card was used.

YourPlay also enables a link to loyalty schemes operated by venues:

- any loyalty scheme offered in Victoria needs to have the capability of being linked to a YourPlay account (and have the loyalty card act as a YourPlay card). The link to YourPlay **must** be offered to those joining a loyalty scheme when they join;
- YourPlay can be used in any venue in the state **without** joining a loyalty scheme; and
- any loyalty scheme cards will also be capable of acting as a YourPlay card in any venue in the state, whether or not that loyalty scheme is used in the venue.

1.2 The evaluation

The overall evaluation commenced in mid-2014 and continued until early 2019 when the final report of the evaluation was submitted.

The purpose of the evaluation of the scheme is to:

- provide an evidence base as to the effectiveness of the scheme in achieving its objectives;
- provide data to improve the effectiveness of the scheme; and
- identify the costs and consequences of implementing pre-commitment.

The evaluation seeks to answer the following six key evaluation questions:

1. has the pre-commitment system been implemented as expected?
2. what (if any) areas of the system require improvement to reach the scheme's expected outcomes?
3. to what extent has the introduction of the Pre-commitment system minimised harm from gambling on electronic gaming machines?
4. to what extent has the introduction of the Pre-commitment system assisted players of electronic gaming machines to improve control over their own gambling?
5. what have been the costs and effects (outcomes) of the introduction of the Pre-commitment system?
6. have there been any unintended consequences (either positive or negative) as a result of the introduction of the Pre-commitment system?

The data sources and data collection and analysis methodologies of the evaluation are set out in Report 2.

Stage 1 of the evaluation involved the development of a detailed project plan for the evaluation, consultation with stakeholders and the finalisation of the framework for the evaluation activities, including indicators of progress and the methodologies for the proposed data collection approaches (Reports 1 and 2 of the evaluation). Following on from the completion of the evaluation framework the SA Centre for Economic Studies (SACES) developed a set of indicators of progress towards YourPlay's objectives, and indicative trajectories for those indicators.

The post implementation stage of the evaluation commenced in 2016 after the state-wide introduction of the Victorian pre-commitment scheme in December 2015.

Data collection activities for the second stage of the evaluation included surveys of gaming machine gamblers in May 2016 and May 2017 (six months and eighteen months after launch); qualitative research with venue managers and staff, and with EGM gamblers in late 2016 and with venue managers and staff in early 2018; a survey of YourPlay cardholders; and a mystery shopping exercise to explore the YourPlay sign-up process as it is actually experienced by gamblers.

The evaluation has also drawn extensively on the (anonymised) administrative data on YourPlay use collected by Intralot during the operation of the system.

1.3 This report

This report represents the final report of the evaluation, consolidating earlier findings around the implementation of the scheme with an assessment of the extent to which the scheme has achieved its targeted outcomes, the costs of delivery, and the cost effectiveness of the scheme.

This report is split into four parts.

Part A details the background to YourPlay's design and implementation, including its underlying program logic, as well as detailing baseline data.

Part B reviews the implementation of the scheme.

Part C reviews the available evidence regarding those factors that appear to be influencing use of YourPlay by Victorian gaming machine gamblers.

Part D presents estimates of the outcomes of YourPlay, its costs, and the cost effectiveness of achieving those outcomes.

Part A Background and Baseline

2. Objectives and Intervention Logic Underpinning YourPlay

2.1 What is YourPlay seeking to achieve?

The program plan for the implementation of YourPlay sets out three broad objectives for the scheme, namely that:

- gamblers make better informed decisions about their gambling activity;
- YourPlay is established as standard venue practice; and
- YourPlay contributes to a reduction to the harm gamblers do to themselves and others.

The second objective established for YourPlay is not an end in itself, but rather an enabling outcome to create the conditions whereby the other two objectives are more likely to be met. As such, whilst progress towards the second objective will be tracked it will be as an intermediate outcome towards achieving the other two objectives.

It is important to note that neither of these objectives are focussed on problem gamblers, but rather are focussed more broadly on addressing the ‘consumer protection’ issue that gaming machine gamblers often possess imperfect information about their expenditure levels and their own patterns of behaviour around gambling. The aim is to ensure gamblers have the information they need to manage their gambling to whatever limits they set themselves, and to address ways in which gaming machine gamblers develop impaired control whilst gambling; namely, difficulties in being able to resist the urge to keep gambling.

Due to the broader focus of YourPlay, our discussion around reductions in the harms arising from gambling will generally be framed around that population of gamblers who experience some degree of impaired control. This population encompasses not only problem gamblers, but also includes those who fall into the moderate risk and low risk categories, where the intensity of any harms is generally lower (indeed given the entirely voluntary nature of the scheme, harm minimisation benefits are more likely to be realised by low risk or medium risk gamblers than by problem gamblers). Thus research undertaken as part of this evaluation has sought to encompass a broader range of behaviours and would encompass behaviours such as chasing losses, binge gambling episodes or any other behaviour that is not necessarily captured by only focusing on the very regular problem gamblers who often form the principal focus of prevalence research.

The two objectives – gamblers make better informed decisions and YourPlay contributes to a reduction in the harm gamblers do to themselves and others – have different causal mechanisms reflecting the two major features of the YourPlay scheme.

The potential for gamblers to “make better informed decisions” is driven by the recording of gambling expenditures and time spent gambling made whilst using YourPlay. This means that all gaming machine gamblers who use the YourPlay card to gamble will be able to view data on their expenditure, either through periodic statements sent to them, or by choosing to view it on an *ad-hoc* basis at kiosks in venue or on-line.

This should lead to better informed gaming machine gamblers who can use this information to gamble at the level they choose. The evidence from the Nova Scotia evaluation (outlined in Appendix A.4) suggests that some recreational gamblers will use the data collected by the system to adjust their gambling behaviours to increase their enjoyment of gaming machine gambling. Focal research’s study found that those who adopted the pre-commitment features in the Nova Scotia trial (adopters) tended to play longer, but achieved a higher cash out value and more net winnings (wins - losses). It was also found that those who had 18+ sessions of play during the trial period tended to have higher gross expenditures on gaming machine gambling when they were using the pre-commitment system, but that they also won more possibly because they were more likely to stop when they were ahead.

The mechanism for reductions in the “harms gamblers do to themselves and others” comes from the other function of the YourPlay scheme, the ability to pre-set limits for net gaming expenditure, or time spent gambling. This should assist some gaming machine gamblers who experience impaired control with respect to their gambling expenditure or time spent gambling (whether this is just occasional chasing of losses through to problem gambling) to stick to the expenditure limits they set for themselves when not being influenced by the excitement of gambling/the gambling environment etc. As the potential harms from gambling largely arise from excessive expenditure of money and/or time on gambling then, to the extent that the YourPlay scheme assists gamblers to maintain pre-determined limits on their gambling, it should reduce these harms.

The expenditure tracking feature may also assist in reducing the “harms gamblers do to themselves and others” as it may identify harmful patterns in an individual’s gambling expenditure that they may then decide to act on.

2.2 How does YourPlay operate?

The core of gamblers' experience of the YourPlay system is the YourPlay card that identifies the gambler to the system ensuring that expenditure and time spent gambling is recorded so that reports can be provided to the gambler. The YourPlay card also applies any expenditure limit or time limit that the gambler may have set.

YourPlay cards can be obtained from any gaming machine venue, either by registering at the venue, or by pre-registering on-line and collecting the card from a convenient venue (for a registered card) or picking up an anonymous 'casual user' YourPlay card from any gaming venue.

In addition to cards issued specifically for YourPlay, all gaming machine related loyalty cards issued in Victoria can be linked to YourPlay account (including a casual user account) allowing the loyalty card to function as a YourPlay card in any venue in the state including venues not using that particular loyalty scheme.

Whilst the cards can be registered to a person this is not required by the system and most of the core features will operate with a casual user card despite its anonymity (e.g. whilst expenditure reports cannot be emailed to a casual user card as the user is anonymous, expenditure reports can be accessed on-line; pre-commitment limits can be set; and expenditure during the day and session will be displayed when first inserting the card and then every 10 minutes).

When first using a card the gambler is required to select a PIN to control access to information at venue based kiosks and for use of the card at a gaming machine. Users also select a user name and password for on-line access to the pre-commitment system and the data related to that card.

If a gaming machine gambler chooses to use the YourPlay card to gamble in a particular session they need to insert the card into the card reader attached to the gaming machine and enter the pin. Data on their play during that session will then be collected by the system, with expenditure and time data able to be retrieved in real time as a live action summary while playing at the gaming machine when pre-commitment has been activated, or retrieved later via reports that can be generated by the player when they access their YourPlay account through a venue kiosk or on-line. In addition, any pre-commitment limits on expenditure or time that have been set by the gambler will be applied to that gambling session.

Where limits on time and spending have been set, a pop-up message will notify users that they are approaching their limit when they reach 75 per cent and 90 per cent of the limit value. If during play a gambler reaches their pre-set limit, play will be suspended and a message will appear on screen informing them that the limit has been reached and asking if they wish to continue. The gaming machine is disabled to provide the player with a break in play and some time to think about what they want to do. The player then needs to select 'Stop playing' or 'Continue playing' and if they press continue – they are asked again if they want to continue to play beyond their limit. This was intended to ensure they were very clear about what they were electing to do. If they elect to continue, play will resume, and the player will continue to receive live action summaries on the screen to inform them of the amount by which they have exceeded their limit (whether in time or net expenditure).

2.3 Applying a program logic approach to YourPlay

At a very high level the relationships underpinning the proposed pre-commitment scheme are as set out in the evaluation strategy developed by the Department (see Figure 2.1). This high level logic model has been expanded on as part of the evaluation, drawing on the existing research on the nature of gambling behaviour, the experiences of previous trials of other pre-commitment systems, the results of the recent evaluation of ATM removal from Victorian gaming venues, and research on the nature of the harms arising from gambling. This background research is summarised in Appendices A and B. The logic model development also drew on consultations with industry and community organisation stakeholders.

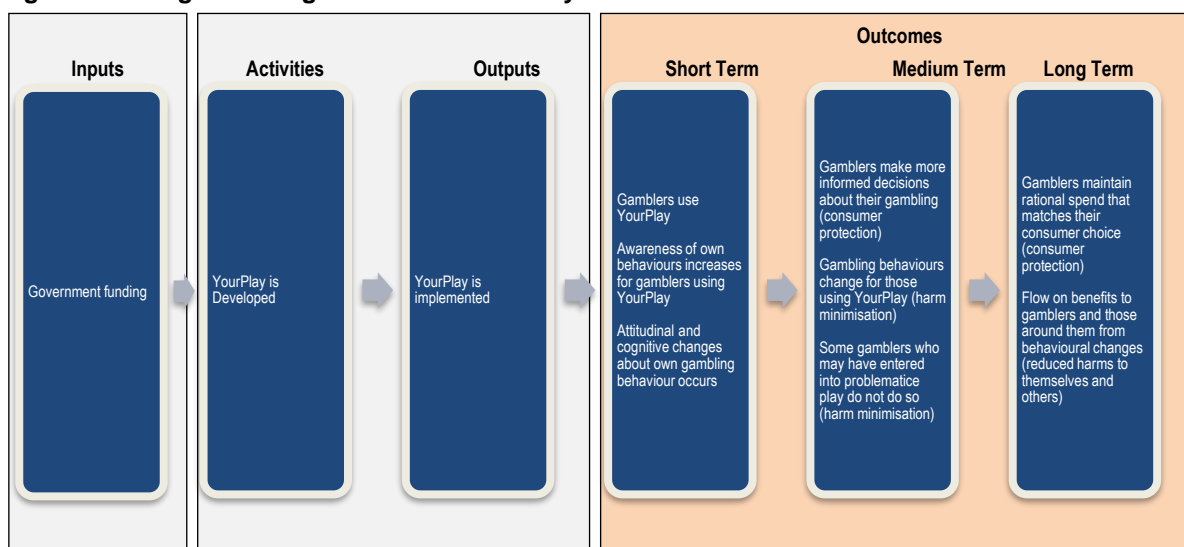
The starting point for developing a logic model is to identify the objectives the project was established to achieve. In this case, as discussed above, there are three objectives:

- gaming machine gamblers making better informed decisions;
- YourPlay is established as standard venue practice; and
- a reduction to the harm gamblers do to themselves and others.

With the second objective effectively acting as an intermediate outcome for the other two.

Although there are linkages between these two core objectives in terms of the types of activities and changes to attitudes and beliefs that need to occur in order for the objectives to be realised, they are sufficiently distinct that it is useful to set out separate logic models for each of them and this is the approach followed here.

Figure 2.1 High level logic model for YourPlay



Source: Office of Liquor, Gaming and Racing, p. 9

As a starting point for establishing the dependencies within the program logic, Table 2.1 summarises how the two main features of the pre-commitment scheme are expected to contribute to the achievement of its objectives.

Table 2.1 Expected operation of pre-commitment scheme

Feature	Initial behaviours	Outcomes
Expenditure and time spent gambling tracking functions	Gaming machine gamblers acquire a YourPlay card Gaming machine gamblers use a YourPlay card when gambling Gamblers access expenditure data	Gaming machine gamblers have a better understanding of net expenditures which leads to expenditure patterns that better match personal financial circumstances and preferences.
		Gaming machine gamblers identify patterns of wins and losses. It is hoped that this will lead to a greater proportion of gamblers 'quitting whilst ahead', resulting in longer time playing for lower net spend (as in Canada).
		Gaming machine gamblers identify problematic patterns in gambling behaviour (e.g. sprees, excess spend). In some cases this will act as a prompt for action, and in some of those cases the action will be sustained.
Pre-commitment function	Gaming machine gamblers acquire a YourPlay card Gaming machine gamblers set limits that reflect their personal financial situation and expenditure priorities Gaming machine gamblers use a YourPlay card when gambling Gaming machine gamblers do not override limit when reached	Gaming machine gamblers who experience impaired control whilst gambling (whether regularly or occasionally) will reach their pre-set limit whilst in a 'spree'. At this point the system prompts the gambler to decide whether they wish to cease gambling (although they can override this). A proportion of them will cease gambling in response to reaching their limit, reducing the potential for harm to themselves or others.
		In addition, some problem gamblers will choose to set a limit on a card as an aid to their control strategies. For some of these problem gamblers the existence of the card and limit will either dissuade them from gambling, encourage them to seek help with their gambling, or lead to them stopping when the limit is reached.

Fundamental to either broad group of features contributing to the achievement of the scheme's objectives is that gaming machine gamblers acquire pre-commitment cards and make use of them whilst gambling. This, however, is a necessary but not sufficient condition to achieving the scheme's objectives as gaming machine gamblers need to act in response to the scheme's features in the way that it is hoped that they will react in order for benefits to be realised.

These understandings about the scheme were then used to map out logic models for each of the two broad objectives of the scheme. These are included at the end of this section at Figures 2.2 and 2.3.

The next stage in using the program logic models to shape the evaluation is to work through them quantifying the various steps.

This can be done "bottom up" starting with plausible assumptions about take-up of the system to identify the number of persons who could then be expected to track their expenditure or set limits. Plausible estimates could also be used to gauge the extent to which those who track their expenditures will change their expenditure patterns. In the same way, estimates of the number of gamblers with impaired control who will both set limits and choose not to override them (or to gamble without a pre-commitment card) can be used to estimate the number of outcomes that could be expected to be achieved.

Alternatively the logic model can be quantified "top-down", by starting with the number of each type of outcome that it is hoped that the system will achieve. Plausible assumptions about the effectiveness of the scheme can be used to estimate how many recreational gamblers, and how many gamblers with impaired control respectively would need to change their behaviours to achieve these outcome targets. Assumptions about the likelihood of gamblers changing their behaviours is then used to identify how many recreational gamblers and how many gamblers with control problems would need to regularly use the pre-commitment scheme features in order to achieve the targeted number of gamblers changing their behaviours. Finally assumptions about the extent to which those who obtain pre-commitment cards use, and sustain their use of, the pre-commitment features can identify the number of gaming machine gamblers who would need to obtain YourPlay cards in order for the scheme to achieve its targets.

This process was undertaken in consultation with the Department working from inputs through to outcomes in order to identify a set of indicative trajectories for YourPlay based on assumptions about take up and change in response to take-up. The original plan was for these trajectories to be updated regularly, allowing progress to be tracked and potential issues identified as they emerged, however this has not been possible due to the limitations of the Business Information system developed to make administrative data from YourPlay available for analysis.

Quantifying the logic model can also provide a reality check for the implementation of the scheme either highlighting the likely scale of objectives given plausible assumptions in the case of a "bottom up" approach to quantification, or by highlighting the scale of activity needed in order to achieve the goals of the scheme in the "top down" quantification.

Outside/contextual factors

Working through the two logic models there are several outside or contextual factors that are likely to be critical to YourPlay's prospects for achieving its objectives.

The first is the views held by gaming machine gamblers about YourPlay (and the broader concept of pre-commitment). If gamblers come to view the use of YourPlay cards as something associated with problem gambling their use is likely to be stigmatised (or at best be seen as something of no relevance to most gamblers) and this could have a significant negative impact on take-up.

Second, venue staff and managers will be one of the most important paths by which YourPlay is promoted and accessed. Their attitudes to the scheme and its potential benefits for their customers is likely to have a significant impact on the way in which they promote the scheme to gamblers in their venue for example, by encouraging those joining loyalty programs to also join YourPlay. Equally the resources available to venue staff to promote and implement the scheme will also be crucial in shaping gamblers' attitudes to the scheme.

Finally, in order for the potential benefits of the scheme to be realised, it is very important that gamblers persist in using YourPlay. A significant factor in determining whether gamblers continue to use it will be the system's ease of use, and the usefulness of its outputs (both the reports/expenditure tracking, and of the expenditure/time limits for those using them).

Figure 2.2 Program Logic - Making better informed decisions

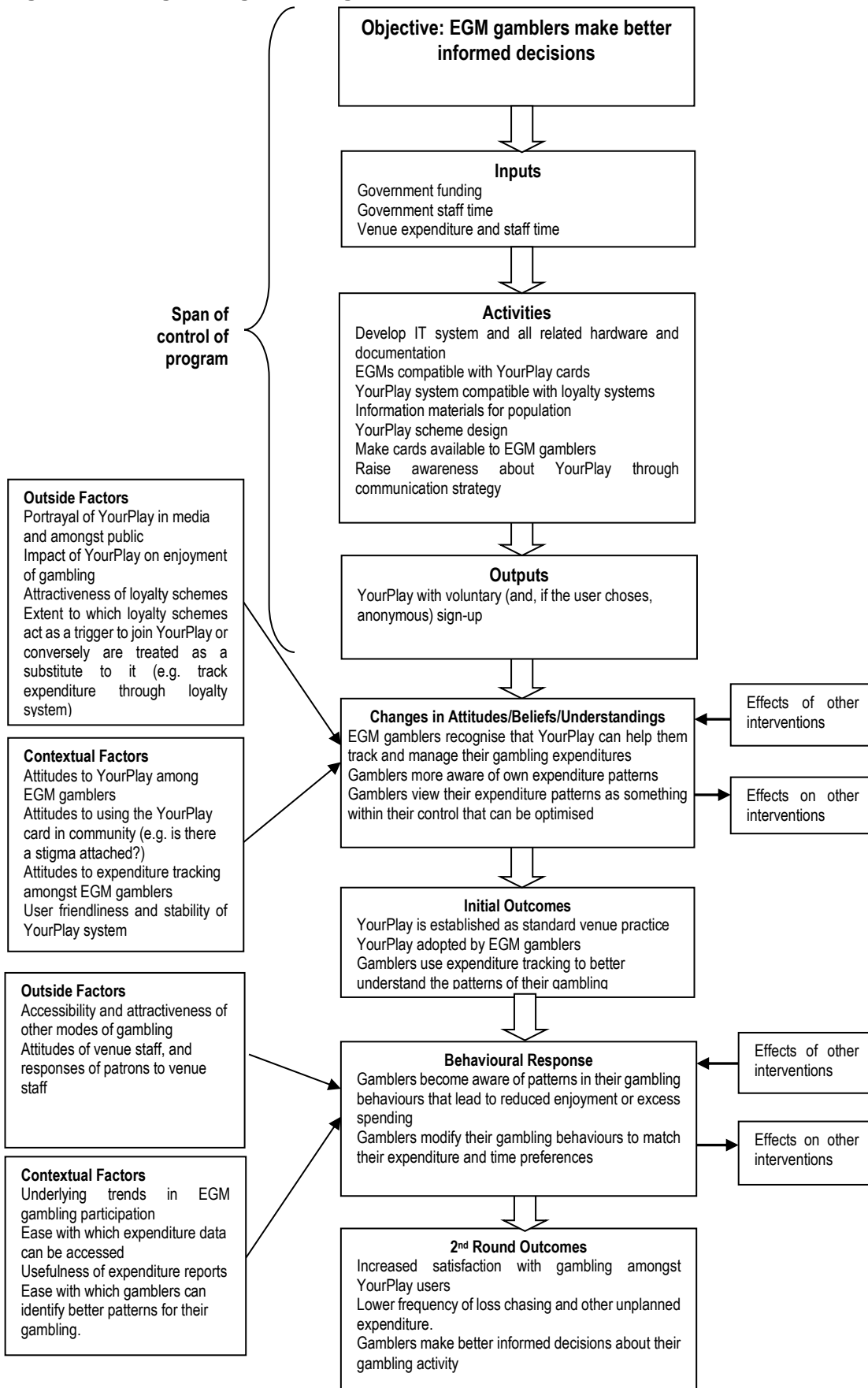
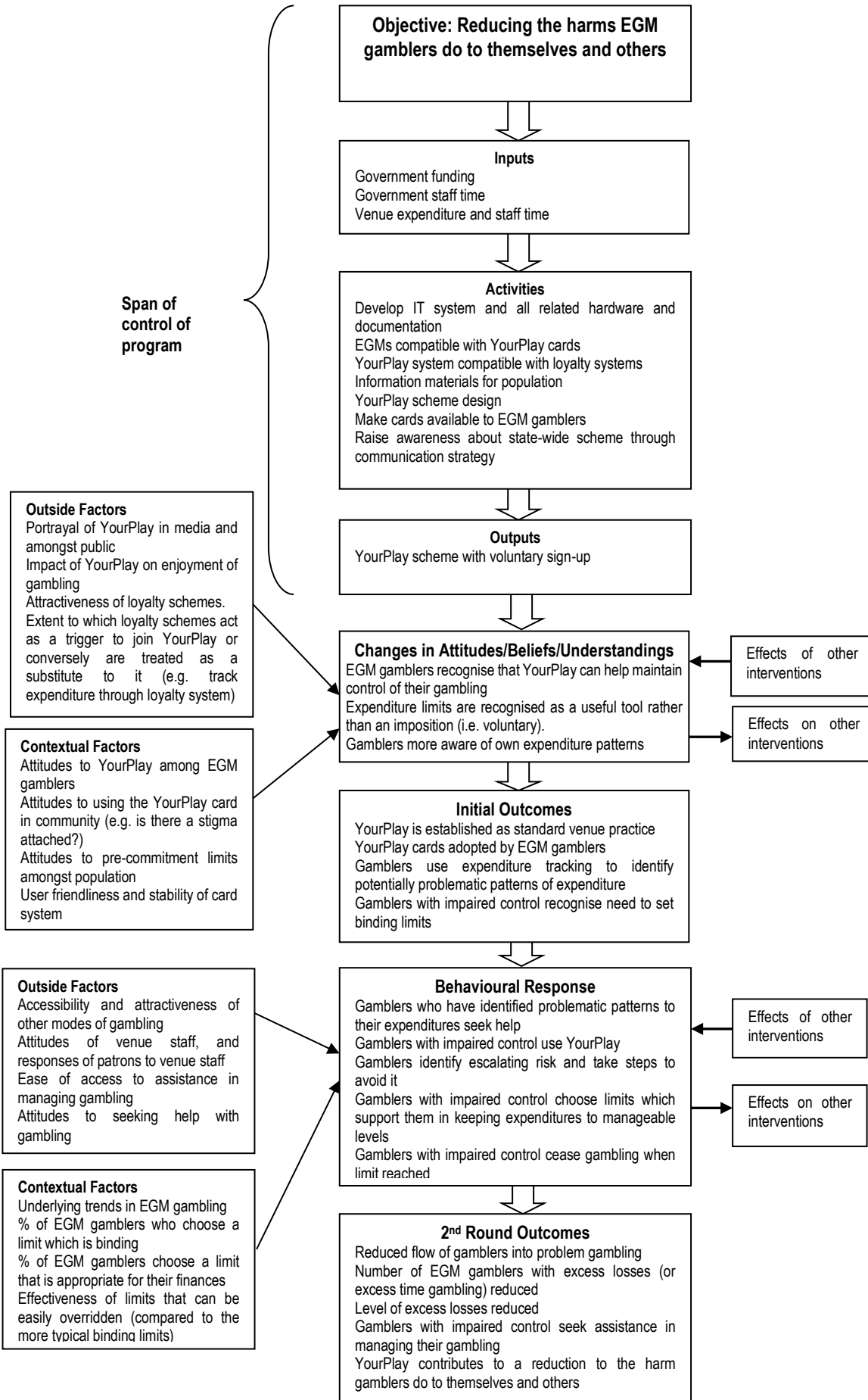


Figure 2.3 Program Logic - Reducing the harms gaming machine gamblers do to themselves and others



3. Stakeholder Attitudes Prior to the Launch of YourPlay

3.1 Qualitative analysis of venue managers and staff attitudes prior to launch

In depth interviews were carried out in October and November 2014 with 12 venue staff and eight venue managers and operations managers; i.e. individuals with responsibility for more than one venue. These 20 participants were drawn from seven venues dispersed throughout Victoria; three clubs and four hotels. In addition to the interviews with 20 'professional' stakeholders, two focus groups were carried out with gaming machine gamblers. Participants were recruited from a sample of gamblers who were surveyed as part of the 2014 Victorian Gambling Survey, and who had agreed to have their contact details passed on for additional research.

The purpose of this qualitative work was to establish a richer understanding of the prevailing attitudes and behaviours that could influence the success of YourPlay, and to identify potential risks to inform the Department's planning. As the brand identity of the pre-commitment system had not yet been finalised by the time of this qualitative research, participants were referring to the pre-commitment system rather than YourPlay, however for clarity YourPlay is used throughout the following discussion.

3.1.1 Misconceptions about the scheme

- There was very little awareness among regular gamblers about YourPlay.
- A number of participants in the regular gambler focus groups thought that pre-commitment limits set by a gambler would only apply in a specific venue/machine.
- Among venue staff and managers, awareness levels varied, as did level of preparedness for the implementation of the scheme and associated technology.
- There were some misconceptions around the details of YourPlay, even among the professional stakeholders. For example the belief that the machine would be 'disabled' when a limit had been reached (rather than play being stopped temporarily with the gambler having the option to override and continue gambling) was common amongst venue managers and staff and EGM gamblers.
- Many venue managers/staff were also incorrectly of the impression that the data collected by YourPlay and loyalty systems would be linked and that venues would have access to YourPlay data.
- Vendors of loyalty system technology appear to be quite active in promoting their systems to venues and many of the misconceptions about YourPlay among venue managers and staff appear to arise from briefings from loyalty program vendors.

The reasons why these briefings are giving rise to misconceptions about YourPlay is not clear. It could be that they result from misunderstanding the briefings provided by loyalty program vendors, for example confusing comments that relate to the pre-commitment functions that have to operate alongside current loyalty programs, with YourPlay. However it could be that the misconceptions are held by the agents of the loyalty programs themselves. This raised the concern that it could make the Department's communication strategy more difficult to implement if the messages venues receive from loyalty program vendors do not match the actual details of the scheme.

- Participants in all of the qualitative consultations (both 'professionals' and gamblers) tended to focus on the limit-setting capabilities when describing their understanding of YourPlay (rather than the ability to track play).
- As a consequence of this focus on the limit setting capabilities, there was a widespread view that YourPlay was targeted at problem gamblers and was broadly analogous to self-exclusion.

3.1.2 Views on the target population

- Stakeholders generally perceived YourPlay to be targeted at problem gamblers. Venue staff and managers described the scheme in similar terms to self-exclusion measures. These professionals saw pre-commitment as an 'interim' step for self-excluders who are returning to the gaming rooms.
- Similarly, gamblers themselves who had self-excluded felt that the scheme might help them to gamble responsibly.

3.1.3 Views on the role of venues and staff in promoting scheme

- A number of venue staff indicated that they would be reluctant to promote the scheme to patrons as they did not want to be seen as implying that the person had a problem, or because they were concerned about potential negative reactions from gamblers. (Although one staff member felt that it may reduce one source of current tension where gamblers seek to use staff members as a de-facto time limit "*They can get angry at the card instead [of me] when they reach their limit*".)

- A lack of time, and a lack of training in addressing sensitive issues, were also identified as barriers to staff promoting YourPlay.
- Venue managers also reported a tension between wanting to promote YourPlay from a sense of responsibility to their patrons on the one hand, and a concern that in doing so they may be undermining their business on the other.

3.1.4 Views on the ability to override limits

- Some stakeholders, particularly EGM gamblers, were critical of the fact that YourPlay allows the limit to be over-ridden, and for play to continue after the limit has been reached. These participants felt that this element of the scheme undermined its utility.
- While some professional stakeholders were also critical of this aspect, they pointed out that, if the limit were rigid, a gambler could simply go to another venue and continue to play.

3.1.5 Expectations for uptake

- Industry stakeholders expected that uptake of YourPlay would be very low. Venue managers believed that those who most needed to use it (problem gamblers) would not do so because of their problem gambling, and that regular/recreational gamblers would not use it because of the potential stigma.
- Gamblers themselves expressed mixed views about their own likelihood of using YourPlay. Some felt that they did not need it; others reported that it would not help them, whereas others reported that it would be useful for themselves, other gamblers and their families.
- Although one venue did talk of proactively encouraging uptake of YourPlay with the assistance of venue staff, the over-riding view was that it was not appropriate for staff to encourage uptake of the scheme or to approach players to encourage them to use the pre-commitment scheme. This was associated with the perception that YourPlay is targeted first and foremost at problem gamblers, and that it is therefore a very sensitive area. Despite this some gamblers felt that staff encouragement was important for promoting and destigmatising the scheme.
- Barriers to uptake included the nature of problem gamblers (i.e. the fact that they might not want to admit to having a problem), stigma around the scheme, the potential reluctance of older gamblers to use the technology, the card itself (that people have so many different cards) and the staff time involved in the registration process.

3.1.6 Loyalty programs

- All but two venues (out of the seven covered) were implementing YourPlay jointly with a loyalty program. Venue staff and managers tended to see YourPlay as being 'attached' to a loyalty program, with the same card being used for both functions.
- Venue managers opting for the loyalty program expressed the view that investing in this option provided better 'value for money' and 'gave something back' for the considerable capital investment involved in YourPlay.
- Some participants felt that loyalty programs would support YourPlay by facilitating awareness of the scheme to patrons and by 'disguising' and destigmatising it by having it embedded within a broader customer service (e.g. the loyalty scheme).
- Other participants were more sceptical about the adoption of the loyalty program for YourPlay and highlighted the fact that many venues were expanding existing reward schemes to cover gambling expenditure (where previously only food and beverage had been covered).
- The timing of the launch of loyalty programs was an important consideration in that, in some venues, the loyalty program was being launched in advance of YourPlay. A marketing campaign was in place for these loyalty programs, with existing customers being encouraged to sign up, and some venues having registration targets. Since this was happening before the pre-commitment component of the technology was available on the gaming machines, venues were, in effect, missing an ideal opportunity to offer and promote YourPlay (i.e. when players sign up for the loyalty card). It was not clear how members of existing loyalty programs would transfer to loyalty programs compliant with YourPlay (and in particular how an offer to join YourPlay would be made to them).
- Loyalty program vendors appeared to be trusted intermediaries for many venues with a number saying that they expected the loyalty program vendor to be their main source of information about YourPlay and/or would provide the training for their staff.

3.2 Consultations with high level stakeholders

All members of each of the Industry Advisory Group and Community Advisory Group were contacted and invited to participate in a one-on-one discussion. Where a suitable time could be found consultations were undertaken face-to-face where possible or by telephone when not. Five consultations were undertaken with members of the Industry Advisory Group, and four consultations were undertaken with members of the Community Advisory Group.

The consultations with the members of the advisory groups were undertaken on a non-attribution basis and, in some cases, commercial in confidence material was discussed. Accordingly the results have not been written up in detail nor attributed to particular stakeholders. In most cases themes were broadly consistent between members of both advisory groups, where a view was only prevalent in one group this has been noted. Significant themes that emerged in the discussions were:

- All participants expressed the view that the benefits of the scheme would be overwhelmingly due to the 'consumer protection' elements provided by the expenditure tracking functions. To the extent that YourPlay impacts on problem gamblers it was felt that this would be almost entirely due to reduced 'flows into' problem gambling in that gamblers with impaired control would be able to use expenditure tracking to recognise problems as they are emerging and take corrective action.
- Many of the participants felt that the expenditure and time limits would have no or very little impact on the harms from gambling because they would either not be set, or would be overridden when reached. For those participants who felt that limits could reduce harm, the prevailing view was that the gamblers most likely to be helped would be gamblers with impaired control who were **not** problem gamblers, e.g. gamblers prone to occasional sprees where their expenditure occasionally significantly exceeded the level that was appropriate for their circumstances.
- Some members of the Community Advisory Group expressed concerns that the increased promotion of gambling enabled by loyalty schemes would offset, or even outweigh, the benefits of YourPlay.
- Participants believed that it is essential that the scheme be perceived by the broader population as one for gamblers as a whole rather than an aid for problem gamblers (with stakeholders expressing a concern that a misconception could easily develop in the community that it was a problem gambler focussed intervention), and all marketing and promotion of the scheme should reflect this, e.g. heavily emphasising the value of being informed about expenditure using the tracking technology.
- The best early indicator of success was regarded as the take-up of YourPlay, both in terms of the proportion of unique gambling sessions in which a pre-commitment card was used, and in terms of the share of total expenditure that related to gambling sessions in which a pre-commitment card was used.
- Venue managers and staff are seen as the key intermediary in determining take up of the scheme by informing gamblers about the scheme and influencing whether or not they participate (particularly through sign-up at when joining loyalty schemes). This makes them a key audience for the Department's communication strategy.
- A number of members of the Industry Advisory Group emphasised that the 'stability' and usability of the technology is critical to take-up of the scheme. This means that it is essential for the system development process to ensure that the pre-commitment system is appropriately tested for stability across the range of gaming machines in which it will be deployed under the types of system loads that could be reasonably expected. Similarly, the stability of the website on which gamblers will register, and the in-venue systems such as kiosks are also important.

Given that it is widely believed by stakeholders that loyalty schemes will be an important driver of take-up of YourPlay (both directly through those accessing pre-commitment through dual use cards, and indirectly by de-stigmatising the use of a card in venues) the stability of loyalty systems could also have a significant influence on the success of the pre-commitment scheme overall as if the loyalty system persistently freezes or is unavailable on some machines in the venue, then take-up (or continued use) of **both** loyalty and YourPlay may be significantly affected.

This was thought to pose a potential challenge for the department's IT vendor because it is likely that there will be a number of loyalty systems used by venues (none of which it has any direct control over), each of which will have their own system architecture and thus potential for conflicts with the core systems running on Victorian gaming machines including the pre-commitment system.

- As the potential benefits of the scheme are likely to relate primarily to the expenditure tracking functions, the usability of the reporting generated is critical to the scheme's potential for success. Members of the Community Advisory Group also expressed concern that consideration also needs to be given as to how these 'consumer protection' benefits can be made available to gaming machine gamblers from a non-English speaking background, or who have literacy and/or numeracy problems. Similarly, accessibility of the scheme to those with a disability also needs consideration.

3.3 Baseline attitudes of gaming machine gamblers

The 2014 Victorian Gambling Survey (VGS) provides the most comprehensive assessment of gambler behaviours and attitudes prior to the launch of YourPlay. There are a few aspects of this which are particularly important in assessing the outside and contextual factors likely to influence take-up of YourPlay: EGM gamblers' use of limit setting behaviours prior to the launch of YourPlay, anticipated use of a pre-commitment scheme if it was introduced, and what gamblers thought they would use a pre-commitment scheme for.

EGM gamblers responding to the VGS reported high existing levels of use of limit setting behaviour in EGM gambling, with use of a spending limit much more common than a time limit. In all, 51 per cent of EGM gamblers reported "always" setting themselves a spending limit when gambling, with a further 3.6 per cent reporting that they did so "often".

Table 3.1 Use of limit setting by EGM gamblers responding to the VGS, gamblers who had used EGMs at least once in the past 12 months, per cent

	Set a spending limit (per cent)	Set a time limit (per cent)
Always	51.0	11.4
Often	3.6	5.0
Sometimes	7.6	4.4
Rarely	8.4	5.8
Never	29.1	72.9
Don't Know	0.2	0.3
Refused to answer	0.1	0.1

Note: Respondents who had gambled on an EGM at least once in the last 12 months, n = 2,269

Source: Schottler Consulting, Victorian Gambling Survey Data, data extracted by SACES

Anticipated usage of a Victorian pre-commitment scheme was also pleasingly high, with just under 35 per cent of EGM gamblers, or 246,000 people, indicating that they would use a pre-commitment scheme. A further 5.5 per cent indicated that they may use it (see Table 3.2).

Table 3.2 Anticipated use of a Victorian pre-commitment system once introduced, gamblers who had used EGMs at least once in the past 12 months, number and per cent

	Number (grossed up to population level) (number)	Per cent of EGM gamblers (per cent)
Yes	245,992	34.8
Maybe	38,742	5.5
No	416,096	58.8
Don't know	5,544	0.8
Refused	1,140	0.2

Note: Respondents who had gambled on an EGM at least once in the last 12 months, n = 2,269

Source: Schottler Consulting, Victorian Gambling Survey Data, data extracted by SACES

Self-reported expected use of a pre-commitment scheme was significantly higher for those who were problem gamblers or whose gambling posed moderate risks. Indeed nearly 60 per cent of those whose gambling was moderate risk reported that they would use a pre-commitment scheme (see Table 3.3).

Table 3.3 Anticipated use of a Victorian pre-commitment system once introduced by problem gambling risk, gamblers who had used EGMs at least once in the past 12 months, per cent

	Non-problem gamblers (per cent)	Low risk gamblers (per cent)	Moderate risk gamblers (per cent)	Problem gamblers (per cent)
Yes	31.5	32.2	58.3	47.1
Maybe	5.3	6.6	4.6	3.9
No	62.1	60.8	36.0	48.9
Don't know	1.0	0.2	0.9	0.2
Refused	0.1	0.2	0.3	0.0

Note: Respondents who had gambled on an EGM at least once in the last 12 months, n = 2,269; sample size by gambler type: Non-problem gamblers n= 1,462, Low risk gamblers, n=512, Moderate risk gamblers, n=222, Problem gamblers, n=73

Source: Schottler Consulting, Victorian Gambling Survey Data, data extracted by SACES

Setting a money limit was the most common way in which EGM gamblers anticipated that they might use a pre-commitment scheme (44 per cent of EGM gamblers, see Table 3.4). Tracking play was slightly less likely to be identified, with 35 per cent of EGM gamblers anticipating that they might use a pre-commitment system for that purpose. The least common potential use identified was setting a time limit (30 per cent of EGM gamblers), but even this least popular of the potential uses had just under 250,000 EGM gamblers anticipating that they might use a pre-commitment system to do it.

Table 3.4 Anticipated ways in which a Victorian pre-commitment system would be used, gamblers who had used EGMs at least once in the past 12 months, number grossed up to population level, per cent

	Set a money limit		Set a time limit		Track play	
	number	per cent	number	per cent	number	per cent
Yes	314,234	44.4	213,273	30.1	249,809	35.3
Maybe	29,817	4.2	42,903	6.1	29,031	4.1
No	354,614	50.1	441,933	62.5	396,391	56.0
Don't know	6,742	1.0	7,298	1.0	30,176	4.3
Refused	2,106	0.3	2,106	0.3	2,106	0.3

Note: Respondents who had gambled on an EGM at least once in the last 12 months, n = 2,269

Source: Schottler Consulting, Victorian Gambling Survey Data, data extracted by SACES

Part B Implementation Review

4. Policy and Legislative Development Process

4.1 Initial rationale

Prior to the 2010 Victorian State Election the *Victorian Liberal Nationals Coalition's Policy and Plan for Gaming* was released. This noted, the broad range of benefits of the gambling industry, including tax revenue that flows to government. However, it was acknowledged that the costs and impact of problem gambling were often 'more widespread'. "Problem gambling can affect people from any walk of life, of any age and gender. The harm goes far beyond the individual gambler. Families, friends, workmates, clients and community groups can suffer because of a person's gambling addiction."⁵

The *Policy and Plan for Gaming* noted the inherent conflict of interest that government faces in being the regulator and a major beneficiary of taxation revenue stating clearly that "government must manage its dual role as the regulator of legal gambling and as the major economic beneficiary of gambling via the collection of taxation and licensing fees."⁶ The *Policy and Plan for Gaming* referred expressly to the introduction of pre-commitment on gaming machines and stated the government would:

- "commit to implementing pre-commitment in gaming venues and across Victoria ...;
- work with gaming venues and other interested parties (including problem gambling groups) on developing protocols to encourage the take-up of pre-commitment and reduce any potential social stigma; and
- revise the content of the Responsible Gambling Codes of Conduct to require gaming venues to support and promote the use of pre-commitment technology" (p. 11)

The introduction of a pre-commitment scheme was one part of the government's Policy and Plan for Gaming, which included the establishment of the Victorian Responsible Gambling Foundation (VRGF) and the Victorian Commission for Gambling and Liquor Regulation (VCGLR).

Other responsible gambling measures set out under the Gambling Act included the removal of ATMs from gaming venues; the setting of maximum bet limits; prohibition on publishing gaming machine advertising outside the gaming machine areas of a gaming venue; the requirement to display player information posters, talkers, brochures and responsible gambling signs; and a requirement for venue operators to operate a self-exclusion program approved by the VCGLR.

The policy objectives for the pre-commitment scheme (as approved by the Minister for Consumer Affairs, Gaming and Liquor Regulation in March 2011) were:

"minimise harm by providing a tool to assist players to control their gambling and avoid escalating into harmful levels of play by enabling players to:

- access information about their gambling activity; and
- set limits before they start to gamble and assist them to observe those limits"⁷

It is important to note that the **projected benefits of the scheme are not confined simply to a reduction in harm to gamblers and others, but extend to improving the information provided to all gaming machine gamblers using the scheme; improving decision making of gamblers and, over the medium to longer term, establishing pre-commitment as a standard gaming venue practice.**

4.2 Legislative enactment

The *Gambling Regulation Amendment (Pre-commitment) Act 2014 (the Act)* was passed by both houses of the Victorian Parliament and received Royal Assent on 11 February 2014, establishing the legislative framework for the delivery of pre-commitment in Victoria. The Act amended the *Gambling Regulation Act 2003 (the Gambling Act)* to introduce a framework for implementation of a voluntary, networked pre-commitment system for gaming machines from 1 December 2015. By that date all venue operators including the casino operator will be required to be connected to the pre-commitment system.

The legislation provided for:

- pre-commitment technology to be available on all gaming machines by 2015-16;
- pre-commitment to be voluntary for players to use and for players to set a limit; and
- players to be able to track their play across all gaming machines in the state.

⁵ *Victorian Liberal Nationals Coalition's Policy and Plan for Gaming 2012*, (p. 7).

⁶ *Ibid.*, (p. 2).

⁷ "Pre-commitment Evaluation Project: Evaluation Strategy", June 2014, (p. 3).

The Act establishes the scheme as a purely voluntary one on the part of gaming machine gamblers, although there will be encouragement for players to use the system. However, for venues taking the steps required to enable pre-commitment (such as installing the required equipment, and making pre-commitment cards available to gamblers) is mandatory.

The Minister for Consumer Affairs, Gaming and Liquor Regulation wrote to all venues on 29 July 2014 and enclosed an information Fact Sheet announcing the pre-commitment implementation project stating that Victoria will be the first jurisdiction to require pre-commitment to be available as a harm minimisation tool and a consumer protection initiative for all gaming machine players.

4.3 Key choices made in design and legislation of the scheme

The design of YourPlay, and the approach taken to encoding it in legislation and regulations, was based on several key choices that will be critical in determining YourPlay's effectiveness and impact:

1. Launching the scheme as an entirely voluntary scheme;
2. Not setting any restrictions on the values that could be chosen for the spending limits or the time limits;
3. Allowing anonymous registration (including for those linking their YourPlay card to a loyalty card);
4. Establishing YourPlay as an 'opt-in' for those joining a loyalty scheme, rather than an 'opt-out'.

Each of these choices and the potential implications of the approaches available are outlined below.

4.3.1 Voluntary scheme

The relative advantages and disadvantages of compulsory and voluntary pre-commitment schemes are widely debated in the context of pre-commitment schemes for gambling and come back to the fundamental rationale for public policy interventions related to gaming machine gambling.

Why are we interested in controlling people's behaviours around electronic gaming machine (EGM) gambling? In general with consumption goods it is generally accepted that governments should try not to alter the patterns of preferred consumption of their populations, except where market failures are present, namely:

- asymmetries of information exist between producers and consumers that result in consumers making different consumption choices than they would if they held perfect information about the characteristics (such as the risks) of the product; or
- the consumption has impacts (either positive or negative) on other persons (referred to as externalities); or
- some consumers face difficulty regulating their consumption, either through addiction or through other less severe forms of compulsive behaviour.

For the majority of gamblers, EGM gambling is simply a desirable form of entertainment. However, each of the three forms of market failure exist for at least some gamblers.

A significant number of EGM gamblers fundamentally misunderstand the purely random nature of EGMs, and therefore spend differently than they would if they were gambling with perfect information. For example, over 50 per cent of 'recreational' EGM gamblers (e.g. those with no risk factors for problem gambling) incorrectly believe that wins and losses on EGMs occur in cycles, and 17 per cent believe that there are ways of playing that can increase the odds of a win (South Australian prevalence survey 2005, quoted in Productivity Commission 2010, pp. 4.17).

There is another group of the population for whom, in most cases, their gambling is controlled and rational, but on occasions they get caught up in a session and bet in a "spree" pattern losing significantly more money than planned. For example, in the 2008-09 Queensland prevalence survey 2.4 per cent of recreational gamblers reported that they have on occasion had difficulty resisting gambling, and 0.5 per cent reported that they have difficulty limiting the amount they spend on gambling.

Finally there is a sub-set of gamblers for whom electronic gaming machine gambling becomes in some sense compulsive; problem gamblers. The Victorian Gambling Survey (conducted in 2014) estimated that 3.2 per cent of those who had gambled on an EGM in the past 12 months were problem gamblers⁸, with a further 9.8 per cent categorised as medium risk gamblers and 22.6 per cent categorised as low risk gamblers (Schottler Consulting 2014, data extracted by SACES).

⁸ It should be noted that not all of those who are problem gamblers and gamble using EGMs will necessarily have impaired control with respect to EGM gambling, in some cases the impaired control will relate to another form of gambling.

Definition of problem gambling

Over the years there have been a range of approaches used to conceptualise the types of gambling behaviour which expose the gambler or others to harm and are therefore potentially of interest to public policy. Terms used in the literature include: ‘problem’, ‘pathological’ and ‘compulsive’ (the three most common) as well as ‘addictive’, ‘excessive’, ‘disorderly’, and ‘at-risk’. Problem gambling can be conceptualised as a medical disorder/mental health problem, as an economic/financial problem, as lying on a continuum of gambling behaviour, expressed in terms of harm to the individual and to others, and as a social construct (with these categories not necessarily being mutually exclusive).

Whilst some stakeholders prefer to restrict their focus to a psychiatric frame, e.g. those who would meet the diagnostic criteria for an impulse control disorder, in general the term is used in Australia to encompass gamblers who are experiencing problems whether or not they are clinically diagnosed (or would meet the diagnostic criteria) as problem or pathological gamblers.

Australian governments use the following definition of problem gambling:

“Problem gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.”

SACES and the University of Adelaide, 2005

Controlling the market failures of gambling through taxation is unlikely to be effective as:

- (a) gamblers do not directly observe the tax they pay on their gambling; and
- (b) the primary cause of the harm from problem gambling is the money lost. Increasing taxation on electronic gaming machine gambling (to the extent that the taxes levied reduced the return to players rather than the return to venues/machine owners) risks exacerbating the negative externalities.

This leaves the introduction of some form of control measure to reduce “access” to gambling (with the most extreme version of such measures being outright prohibition) as the approach most likely to address the market failures in gambling.

Of course harm minimisation measures themselves impose costs on all those gambling on EGMs⁹, including in the case of those whose gambling does not exhibit any impaired control, and these costs may be greater than the benefits they realise from the harm minimisation measures. Therefore any harm minimisation measure should be structured so as to have as little impact as possible on the gambling of those whose gambling behaviour exhibits no impairment of control, whilst having the largest possible impact on those with problem gambling and spree gambling.

Considering these factors the Productivity Commission identified pre-commitment systems (where gamblers can nominate a spending limit for their gambling and this limit is enforced) as one of two harm minimisation measures which the evidence suggested may be effective in the Australian context without unduly reducing the welfare of recreational gamblers (the other being a \$1 maximum bet limit). They also recommended a number of measures aimed at increasing the statistical literacy of the community so the operations of EGMs would be more widely understood (Productivity Commission 2010, p. 54-56).

For gamblers who do not have impaired control with respect to their gambling, the limit setting function of a pre-commitment scheme is unlikely to deliver any benefit, although they may still benefit from the improved information about the individual’s gambling behaviours as a result of expenditure tracking, and a possible reduction in the risk of gambling shifting from not at risk to low/medium/high risk.

Where the pre-commitment scheme is fully voluntary the costs the scheme imposes on gamblers (whether with or without impaired control) will be outweighed by the benefits to them, as they will only adopt the scheme if they perceive a benefit large enough to overcome whatever costs there are in adopting it. However its overall benefits, and in particular the impact on harm minimisation is likely to be significantly lower as:

- a) it can only deliver benefits for those gamblers who choose to go to the effort of adopting it; and
- b) it is readily overridden/switched off by gamblers experiencing impaired control when it seeks to hold them to their pre-set limits.

Where the scheme is fully compulsory the costs of participating in the scheme are imposed on ALL individuals who wish to participate in gambling. This means that the total costs of the scheme to gamblers will be much higher as it is spread across a wider pool of gamblers. And it may potentially deter some recreational gamblers from gambling altogether. However, the benefits of the scheme will also be spread across the full population of gamblers. Those gamblers who have impaired control with respect to their gambling will also find it much

⁹ These costs can be in the form of time or money required to comply with regulatory requirements, or through gamblers receiving less satisfaction from gambling due to not being able to use their preferred form of gambling or not being able to gamble in their preferred manner.

harder to bypass the restrictions imposed by the scheme. Norsk Tipping and the (now abandoned) Nova Scotia pre-commitment system are examples of a compulsory pre-commitment system (see Appendix A for a brief overview of evaluations of existing pre-commitment schemes).

There is also an intermediate system such as that adopted by Svenska Spel, where participation in the expenditure tracking and reporting systems is compulsory, but use of expenditure or time limits is voluntary.

There is no *a-priori* reason for adopting a voluntary, compulsory or partially compulsory system. The optimal choice is going to be determined by how large a reduction in the harms associated with gambling the two broad approaches make, how much benefit the improved information on gambling spending delivers to gamblers and how large the costs of participation are for gamblers (whether that be in terms of reduced enjoyment of gambling, time to acquire a card etc.). It will also be influenced by value judgments on how important it is to minimise the imposition of Government controls on individual spending choices.

In the case of YourPlay the decision was made to introduce it as an entirely voluntary system, not only as to whether or not to use YourPlay, but also in terms of whether users of YourPlay are required to set limits. Users are also able to override any pre-set limits. However, for those who wish to use machines operating in unrestricted mode at the Melbourne Casino use of YourPlay, and setting an expenditure and a time limit, is compulsory. And if the set limit is overridden the gaming machine can no longer operate in unrestricted mode.

4.3.2 No restrictions on limit values

Under YourPlay limits can be set on expenditure (e.g. net gaming revenue), time spent gambling, or both. The monetary limit can be expressed in terms of net gaming revenue per day or per week. Limits can only be set (and monitored) in whole dollars. The time spent gambling limit can be expressed in hours or minutes and, as with expenditure, this can be measured over the course of a day or a week.

The voluntary nature of the scheme was also extended to the process of setting limits, with no restrictions placed on the values of the limits that can be set.

The advantage of this is that it may encourage those who would otherwise be reluctant to accept a limit if the value was imposed (or at least if an upper value was imposed) on them. And in the case of some of the very high net worth individuals gambling at the Melbourne Casino, the need to accept a low limit (or go through a process of proving assets or income to have a limit changed) could potentially discourage them from visiting Melbourne for gambling.

The disadvantage is that it allows gamblers to effectively disable the limit setting function (by setting limits that are not binding such as a daily loss limit of \$10 million) whilst still having all of the other harm minimisation features of EGM machines in Melbourne Casino other than the periodic 'pop-up' reporting expenditure in the session being turned off if gambling on a machine enabled for unrestricted mode (just under 40 per cent of the machines in the Casino).

4.3.3 Allowing anonymous registration

In an approach designed to alleviate potential concerns related to privacy (and ensure that privacy concerns did not hamper take-up of YourPlay) YourPlay can be accessed not only through a registered card (which records details of the gambler including name, post code, gender and age group range – addresses are only required if the player wishes activity statements to be mailed out), but also through a 'casual player' card. This card includes no link to identifying individual data.

The advantage of this decision is that it may encourage some gamblers who would otherwise avoid YourPlay out of privacy concerns to use it.

The potential risks are that it means that this category of user will not receive the annual expenditure statements which can potentially perform a valuable consumer protection function. It also makes it more difficult for the Department to track use of YourPlay as it is not possible to identify how many of the cards in use are multiple cards held by one gambler. It is also not necessarily possible to identify cases where Crown Rewards users have ceased using YourPlay due to the way in which the system was implemented in the Melbourne Casino means that YourPlay can be de-linked from a Crown Rewards loyalty card without cancelling the YourPlay account (for other loyalty schemes the YourPlay account must be cancelled to remove it from the loyalty card which is identified in the system data). Finally, the high share of casual cards makes evaluation more difficult as those YourPlay users cannot be identified and asked to participate in research.

4.3.4 YourPlay as an ‘opt-in’ for loyalty scheme members rather than an ‘opt-out’

Loyalty card systems offered by venues are regarded by stakeholders as a critical ‘gateway’ into pre-commitment, both directly through users registering for pre-commitment through a loyalty card, and indirectly by de-stigmatising the use of cards in venues.

However, there was a real risk that sign-up through loyalty cards would be lower than anticipated due to inertia on the part of gamblers. A solution to this, which still retains the entirely voluntary nature of the scheme, would have been to adopt an ‘opt out’ model, e.g. all persons registering for a loyalty card would automatically have it registered as a YourPlay card as well (presumably with expenditure tracking automatically turned on, and given the option of setting a limit) but with the option of turning it off subsequently. There is robust evidence that opt-out models result in higher take-up of services/policies (c.f. Madrian and Shea (2001); Choi et al., (2002); Thaler and Benartzi (2004); Thaler and Sunstein (2003, 2008)).

4.4 Impact of policy decisions on the implementation of YourPlay

The legislation and regulations developed to enact YourPlay generally fit the objectives of the scheme well, although the impact on use of the scheme due to adopting a wholly voluntary approach can only be examined as part of the impact evaluation and should generally have supported the smooth implementation of YourPlay and its take up by gamblers.

There are three exceptions to this:

- 1) Structuring the link between YourPlay and loyalty programs as ‘opt in’ rather than ‘opt out’ has significantly reduced the potential for loyalty schemes to act as a key feeder of gamblers into YourPlay. And the data from the CATI survey on the proportion of those joining loyalty cards who reported that they were encouraged to join YourPlay suggests that it is not close to fulfilling its hoped for role as a key pathway into the scheme.

Recommendation 1: We recommend that the Department revisit the decision to operate the link with loyalty schemes as an opt-in rather than opt-out.

- 2) The use of a YourPlay card on which expenditure and time limits have been set (and not exceeded) **automatically** switches enabled EGMs in the Melbourne Casino into unrestricted mode and therefore disables a number of other harm minimisation measures (including restrictions on maximum spin rate, maximum bet limit, a ban on autoplay and restricting note acceptors from accepting notes with a denomination above \$50), increasing the risk of harms from gambling to those gamblers without them necessarily having made an explicit choice. (Prior to the introduction of YourPlay it was a requirement that those using EGMs operating in unrestricted mode at the Melbourne Casino were using the Casino’s own pre-commitment system with both a time and expenditure limit set, and it is our understanding that this would also automatically switch machines into unrestricted mode, so the current approach represents a continuation of the situation prior to the introduction of YourPlay).

Recommendation 2: We recommend that the Department works with the Melbourne Casino to explore ways to make the switch of machines to unrestricted mode when YourPlay is being used more transparent to gamblers.

- 3) As having YourPlay with limits set (and not exceeded) active on a Crown Rewards loyalty card automatically disables most of the other harm minimisation measures on enabled machines located in the Melbourne Casino the only potential offset for this increase in risk is that the harm minimisation features of the YourPlay card, namely the limit set and the pop-up message every 10 minutes identifying the money and time spend gambling that day. And because the YourPlay system currently places no restrictions on the limit set by gamblers even this element of harm minimisation is frequently not present with limits set that are too high to be binding, leaving the expenditure tracking pop-ups as the only remaining harm minimisation measure.

Recommendation 3: We recommend that the Department reviews approaches to achieving better outcomes for gamblers from the use of YourPlay cards in the Melbourne Casino. This could include working with the Melbourne Casino on the script used by casino staff around limit setting to ensure that it represents best practice in terms of assisting gamblers to set the limits that are right for their personal circumstances.

5. Scheme Governance and Project Management

5.1 Administrative arrangements

Liquor and Gaming (formerly known as the Office of Liquor, Gaming and Racing) within the Victorian Department of Justice and Community Safety (the Department) was responsible for the roll out of the pre-commitment scheme as well as its on-going management. Extensive documentation in the form of a Program Plan stating how the objectives of the Pre-Implementation Project (PIP) would be achieved has been reviewed by SACES as part of this evaluation. The implementation project included four separate work streams, delivering to one overall policy and project objective – that is, to establish the pre-commitment scheme. The four streams include:

- a) Pre-commitment Policy work stream (e.g. responsible for legislation and regulations);
- b) Pre-commitment Evaluation;
- c) Pre-commitment Community Awareness and Education; and
- d) Pre-commitment Readiness for Service (i.e. business change and readiness).

The scope of the implementation project and the pre-commitment scheme as a whole is very broad. Following the four streams listed above it included consideration of, and work teams focussed on:

- the regulatory and legal framework;
- technical system requirements and approval thereof;
- player account equipment;
- business changes and operating procedures at the venue level including staff training;
- community education and awareness;
- industry engagement and communications;
- evaluation of pre-implementation processes (i.e. formative evaluation); and
- evaluation of post-launch benefits (i.e. impact evaluation).

Delivery of YourPlay on a day to day basis was the responsibility of the Pre-Commitment Implementation Project (PIP) established for that purpose within the Office for Liquor, Gambling and Racing. The governance model for the implementation project is set out in Figure 5.1.

The Project Director was responsible for the day to day operation of the implementation project, with the Senior Responsible Owner focussing on strategic direction.

The Senior Responsible Owner (SRO) for YourPlay is Cate Carr (Executive Director, Liquor and Gaming). The SRO is the single person accountable for the overall success of the project. The SRO was also the Chair of the Pre-commitment Steering Committee.

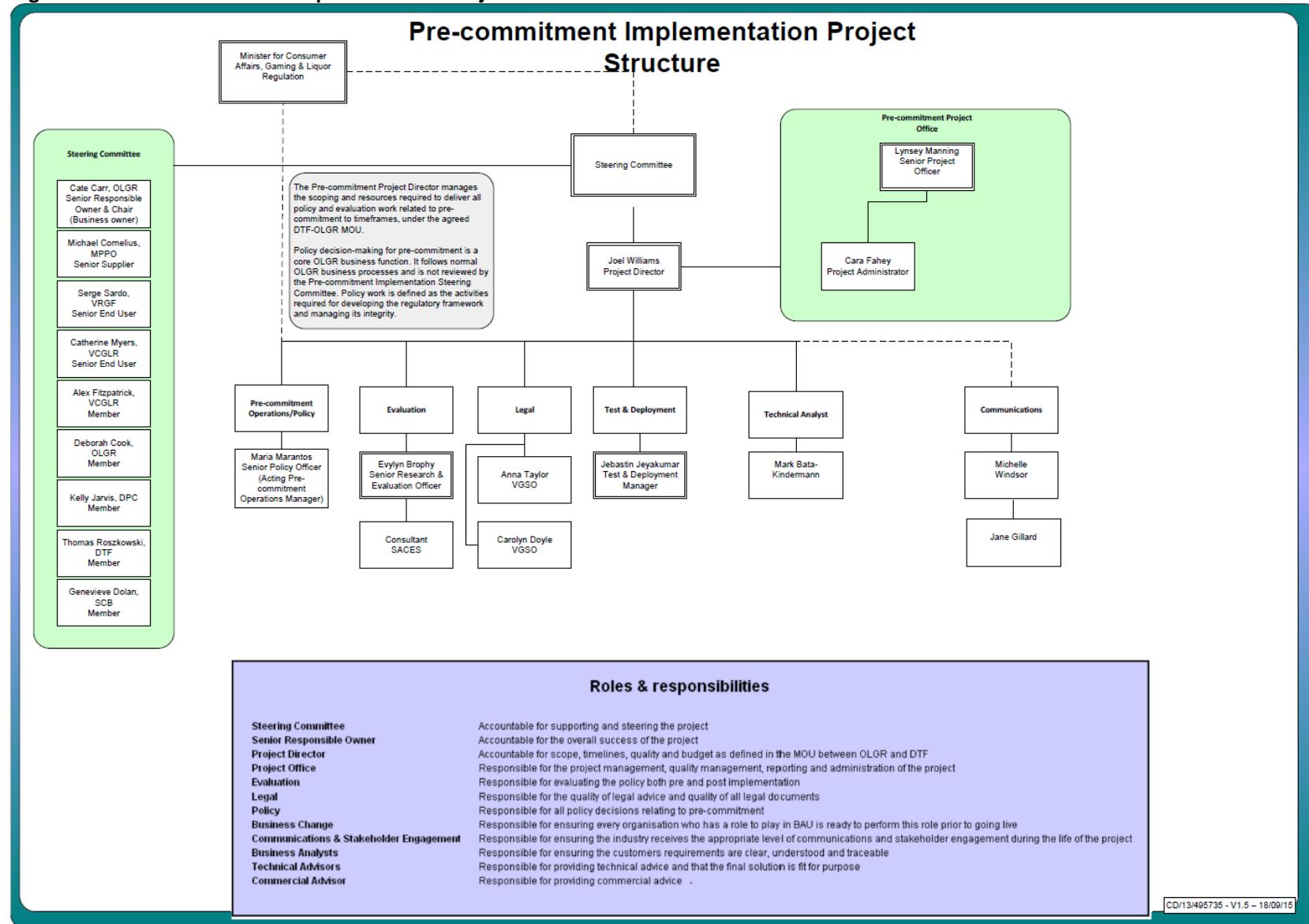
The actual implementation of the scheme's technological solution was contracted to Intralot, the provider of the overall gaming machine monitoring system in Victoria (excluding the gaming machines located in The Melbourne Casino for which the Melbourne Casino is responsible for the monitoring).

As the raw data from YourPlay's operations is difficult to interpret, a data management project was commissioned to develop a business intelligence solution. This was designed to provide on-going data on the Scheme's operations to the project team to allow any potential issues with the Scheme's operations to be identified early and to support reporting on the program to the steering group and to the Minister for Consumer Affairs, Gaming and Liquor Regulation. It was also designed to provide the data needed for the evaluation study with the administrative data needed for the evaluation.

The conduct of the evaluation into the program was contracted to a team led by the SA Centre for Economic Studies (with this report representing the final output of the evaluation project). The evaluation was supported within the PIP team by a research and evaluation officer who acted as the lead contact to the evaluation team as well as undertaking a number of evaluation and research tasks on YourPlay within Liquor and Gaming.

In addition to the formal governance mechanisms the implementation project had several advisory bodies. The Industry Advisory Group comprised representatives of the relevant peak bodies (AHA Victoria, Clubs Victoria, Community Clubs Association of Victoria) and several larger gaming machine operators (The Melbourne Casino, ALH Group, RSL Victoria). The Community Advisory Group included representatives from the 'concerned sector'. The implementation project also participated in the Gateway Review process, which provided an additional layer of scrutiny and feedback.

Figure 5.1 Pre-commitment Implementation Project structure



5.2 Impact on implementation

5.2.1 What has worked well

Generally the management and organisational structures adopted, and the approaches taken to implementation, have worked very well in terms of supporting the development and implementation of YourPlay.

The designation of the Executive Director of Liquor and Gaming as the SRO meant that on the one hand the SRO was extremely experienced in regulation of EGM gambling, and in working with the relevant industry and community stakeholders, and also meant that there were no information gaps or potentials for miscommunication between the SRO and the Executive Director of Liquor and Gaming as they were one and the same person.

The membership of the Steering Committee, includes the CEOs of the Victorian Commission for Liquor, Gaming and Racing (VCGLR) and the Victorian Responsible Gambling Foundation (VRGF) ensuring the key potential end users within Government are involved in the management of the scheme's implementation. And this involvement generally drew on their expertise, for example both the CEO of the VCGLR and the VRGF created and modified risks in the risk register, etc.

The PIP team also acted proactively and promptly in response to issues that were raised through various external reviews such as the Gateway reviews, feedback from the Industry Advisory Group, and early findings from the evaluation. For example, not long before the launch of YourPlay the RSL had experienced significant problems with the integration of their in-house loyalty and pre-commitment system and the gaming machine monitoring system run by Intralot, with issues such as drop outs of the loyalty scheme and of EGMs persistent and common. This then led to a steep drop off in use of the loyalty scheme.

The PIP team responded by working with Intralot to establish a 'sandbox' in which loyalty system vendors could test the compatibility of their system architecture with the monitoring system well in advance of launch, and worked with loyalty scheme vendors to ensure that they all took up this opportunity. As a result, none of the loyalty systems created system stability issues after launch.

The key staff selected for the PIP team (whether it was serendipitous or due to excellent recruiting) not only had the necessary skills in managing complex IT projects, but also had knowledge of the gaming industry, giving them a greater insight into which approaches to program implementation and stakeholder management would be more effective. Indeed the effectiveness of the stakeholder management has been a clear success of the implementation project.

5.2.2 What did not work well

Resourcing

With hindsight it appears that the implementation team was stretched too thin, with all of their resources required to manage the dual tasks of a very complex IT project, with the requirement to work with venues and loyalty system vendors to ensure that all of the necessary hardware and training would be in place prior to launch, and that loyalty schemes would not affect the stability of the system.

Which leads to the first of two gaps in the management structures around implementation; the lack of a specific benefits realisation manager. Given the workload pressure, and cognitive load, on the Project Director in managing the overall project delivery there was insufficient resources available for them to also ensure that benefits were able to be realised. In a 'core' IT project this would not necessarily be a problem as successful roll out of the technology comprises the bulk of the benefits realisations. However in this case because successful implementation of the project also required changes in the attitudes and beliefs of gamblers, and of venue managers and staff, a specific, experienced, benefit realisation manager would have significantly improved the Scheme's chances of effecting change as they could have focussed on achieving these changes. In the case of YourPlay, the PIP's Senior Evaluation and Research Officer also undertook some of the tasks of a benefit realisation manager in addition to their core role, and since the commencement of YourPlay the Operations Manager has been performing these tasks. However, in neither case were they resourced sufficiently that benefits realisation could be their primary focus.

Recommendation 4: We recommend that in future projects where changes in the behaviour of a segment of the population are required, that a senior and experienced individual be appointed as benefits realisation manager at the start of the implementation project to ensure all efforts to change behaviours and understandings are coordinated, consistent and appropriately targeted.

The resource constraints facing the implementation project also fed through to the Communications Strategy which was not funded at the same time as the broader implementation program. Whilst the Department of Justice was able to mitigate some of the impact of this by funding an initial, smaller scale, Communication Strategy from its internal resources, it is likely that the nature and scale of this initial communications activity was different than would have been the case if the communications element of the implementation had been fully funded from the start. And even when funding for the Communications Strategy was released it was somewhat lower than initially requested, resulting in a smaller scale media buy.

There is some evidence that the communications strategy was in large part ineffective, for example the evaluation of the Communication Strategy found no statistically significant change in awareness of YourPlay after the Communication Strategy was implemented (see Chapter 7 for a more extensive discussion of awareness of YourPlay). It is, of course, not possible to determine whether a better resourced Communication Strategy would have had an impact on awareness of YourPlay, or whether the lack of impact was due to either the difficulty of reaching the necessary target group, or a failure in the design of the strategy.

Recommendation 5: Where widespread awareness and behavioural change are required in order to achieve a project's benefits, the communications strategy should be planned and funded as part of the core project.

Management information

Access to high quality and timely management information is an important element of management. Unfortunately this has not been the case for YourPlay. In the planning for the project prior to launch it was assumed that the relevant data needs of both the management and reporting of the Scheme and of the evaluation study could be met by the data reports produced by Intralot. Despite the PIP team reaching out to Intralot during the design phase around the data needs for on-going management and for the evaluation (including the PIP team receiving confirmation from Intralot that its reporting system would be able to meet all of the data needs of the evaluation study either from the regular reports or from one-off custom extracts), it became apparent soon after launch that the data supplied by Intralot would not be fit for purpose.

The Department then commissioned the development of a business intelligence (BI) system for YourPlay which was intended to convert the raw system data provided by Intralot into a format that could inform both management of YourPlay and the evaluation. Initially this BI system (based on an Oracle database) was anticipated to be available by mid-2016. However, it was not available until late December 2016, 12 months after launch. It was then discovered that there were a range of flaws in the way in which data was being aggregated and cross tabulated, requiring the system to be extensively revised. As at the preparation of the report in January 2019 (37 months after launch) whilst the performance of the BI system is significantly improved, these issues have still not been fully resolved and more sophisticated data analysis and extraction (including that required for the evaluation) can still not always be reliably undertaken.

There have also been significant flaws in the management of the BI system development, on a number of occasions the development team responsible have not been able to identify how a variable is defined or created in the system due to a failure to appropriately document the system. For example, it is still the case at the preparation of the final report in January 2019 that the variable "expenditure in sessions where a limit is exceeded" returns a value equal to fifty per cent of the turnover in that session rather than its targeted value which is the amount by which spending exceeded the limit, and the BI system developers have not been able to supply an explanation of why this occurs (or indeed how the system calculates this variable).

Whilst, as far as we are aware, the accuracy of the top level reports on issues such as usage prepared for the Minister for Consumer Affairs, Gaming and Liquor Regulation has not been affected, it meant that more complex queries involving cross tabulations and analysis of changing patterns of expenditure were not possible (and even now there are some forms of performance information that still cannot be extracted from the BI System). This meant that it was not possible for the evaluation, or Liquor and Gaming's own internal analysis, to provide detailed reports on the program's operations in the critical first year and a half, meaning that it has been, to an extent 'flying blind' and not able to undertake the degree of continuous improvement that would normally be expected of a novel project of this type.

Recommendation 6: Good quality management information is critical to support the continuous improvement of projects, and the contract with the primary IT vendor should explicitly identify the nature and quality of information to support the on-going management of the scheme together with the way in which it is to be supplied.

Recommendation 7: The BI team should be required to fix the remaining errors in the BI System.

6. Stakeholder Management

6.1 Approach taken

The PIP team invested significant staff time into its stakeholder management efforts and this significantly increased the effectiveness of the technical implementation process.

Through the design and preparation for launch stage of YourPlay, the PIP team faced a series of significant stakeholder management challenges.

First they needed to work with high level representatives of venue operators (through the Industry Advisory Panel) and the concerned sector (through the Community Advisory Panel) to maintain their constructive engagement with the policy development and roll out.

Second, they needed to engage with all of the potential vendors of venue equipment and loyalty program systems to ensure that the products being offered in the Victorian market would meet the requirements of the scheme. And this engagement had to begin before the regulations (and therefore the requirements of the scheme) were finalised.

Finally, the PIP team needed to engage with all 502 hotels and clubs with gaming machine entitlements in Victoria as well as with the Melbourne Casino to ensure that they understood venues' responsibilities under the scheme, the technical requirements of the technologies, the training needs for managers and staff, and finally that they understood and could meet the timeline for implementation.

6.2 Impact of stakeholder management on implementation

In general the stakeholder engagement, particularly through the complex process of preparing venues for launch, has been a success.

Indeed, in many aspects it has been exemplary, particularly the way in which it engaged with its stakeholders both to optimise the technical design of the system and to ensure their awareness of and compliance with, the requirements of the system.

This is also the overall conclusion of the Gateway Review team, which noted that:

The Review team finds that the stakeholder engagement activity has been very effective and this has been an ongoing key strength for the department and acknowledged by all interviewees. The effectiveness of the engagement strategy has resulted in the stakeholders being well informed to support the development and implementation stage of the project.

Ultimately the greatest testament to the success of the stakeholder management was that by launch in December 2015 every one of the 503 gaming venues in Victoria (including the Melbourne Casino) had installed compliant technology, staff had appropriate training, and the launch was seamless from a technical perspective. Loyalty schemes were all compatible with the monitoring system, and there have (as at the time of writing this report) been no cases where a loyalty scheme's IT system crashed the Monitoring System in a venue.

The stakeholder engagement has also been successful in addressing many of the misconceptions around YourPlay which were common amongst venue managers and gaming staff prior to the launch of YourPlay (see Section 3.2 for findings of the qualitative research undertaken as part of the evaluation).

The stakeholder engagement has been less successful in engendering an understanding amongst venue managers and gaming staff of their role in promoting the scheme and engaging with patrons about it. Venue managers and gaming staff still report uncertainty as to how to engage with patrons around YourPlay, and in some cases report feeling that it isn't their place to promote the scheme to patrons. And the mystery shopping undertaken as part of this evaluation identified a number of venues whose staff misunderstood important aspects of the scheme (see Chapter 14 for details).

7. Implementation of YourPlay

7.1 What is required for the benefits to be realised

Drawing off the intervention logics, it is possible to identify factors that are necessary (but not individually sufficient) for the achievement of YourPlay's objectives. These factors are set out below and then the extent to which the necessary changes appear to have been realised (or at least are on track to be realised) is assessed in the following Sections.

It is typical in a process evaluation to restrict this type of assessment to those factors which can reasonably be thought of as within the control of the project team (in the context of an intervention logic this extends to the outputs of the scheme but excludes outcomes). However in this implementation review the analysis has been extended to incorporate the contextual factors that will influence (positively or negatively) YourPlay's ability to achieve its objectives, as well as preliminary data on the achievement of the objectives themselves.

Technical – within Department of Justice's control

- Stable and reliable IT system developed to implement YourPlay and successfully integrated with existing monitoring software.
- IT system development completed within the timelines of the project.
- Appropriate specifications for hardware, and loyalty card systems, made available to third party vendors and to venues.

Technical – outside of the Department's control

- Gaming venues understand the technical requirements of the YourPlay system.
- Gaming venues purchase and install the necessary hardware, within the required timeline.
- Loyalty cards are implemented in a way that preserves system stability.
- Equipment installed in venues works.

Attitudinal/Behavioural Change – venues

- Gaming venues train management and staff in the technical aspects of the YourPlay system, and in approaches to engaging with patrons regarding the scheme.
- Gaming venue management and staff understand YourPlay, and their role in it.
- Gaming venue managers and staff have a positive view of YourPlay and the benefits it could deliver to their patrons.
- Gaming venue managers and staff see YourPlay as having both potential consumer protection and harm minimisation benefits for gamblers.
- Gaming venues adopt processes to support YourPlay.
- Gaming venue managers and staff promote YourPlay (whether to the venue as a whole, or to specific patrons as appropriate), particularly through loyalty schemes.

Attitudinal/Behavioural Change – gamblers

- Gaming machine gamblers believe that it is important to monitor and manage their gaming expenditure.
- Gaming machine gamblers are aware of YourPlay.
- Gaming machine gamblers believe that YourPlay could be useful for them.
- Gaming machine gamblers register for YourPlay.
- Gaming machine gamblers use YourPlay when gambling.
- Gaming machine gamblers use YourPlay to better manage their gaming activities within their own limits, either by:
 - a. tracking their expenditure using YourPlay and adjusting it where necessary to increase the level of satisfaction they derive from gambling relative to a given level of expenditure; and/or
 - b. tracking their expenditure using YourPlay and adjust it where necessary to fit within whatever limits they have set for themselves; and/or
 - c. by setting binding limits on expenditure and/or time and not overriding them.

7.2 The technical implementation process

The *technical* aspects of the implementation, both those directly controlled through the procurement process, and those that needed to be implemented by venues, have been very professionally and effectively executed (with the exception of the management information system).

7.2.1 Within the Department's control

The IT systems required to implement the scheme, both centrally and in venues, were successfully identified and set out in an implementable specification.

The IT system developed to deliver YourPlay has been stable in use.

7.2.2 Outside of the Department's control

Gaming venues understood the technical requirements of the YourPlay system.

Venues acquired the necessary equipment, which met the technical requirements specified by the Department, to support the YourPlay system, and this was installed and operational in all venues by the launch date.

The process of ensuring that loyalty scheme technology would be compatible with the broader system was well designed and executed, and has resulted in a roll-out of loyalty technology that did not interfere with either the Monitoring System or the YourPlay system.

Fundamental to the success in securing technical implementation in those areas outside of the Department's control was the stakeholder management activities of the PIP team. As noted in Section 6, this stakeholder engagement has generally been exemplary, and was broadly praised both in consultations we undertook with stakeholders, and in consultations undertaken by the Gateway Review team.

However, the mystery shopping undertaken as part of this evaluation identified widespread failures of equipment in venues, including card readers on machines, YourPlay cards issued, kiosks, and the equipment used to encode the cards. As Liquor and Gaming has undertaken extensive communication to venues on their obligations regarding pre-commitment equipment it is our view that further communication activities are unlikely to foster effective change amongst venues.

Recommendation 8: *The VCGLR should be encouraged to impose the penalties set out in Section 3.8A.12 Gambling Regulation Act 2003 for those venues that are not compliant with the requirements around pre-commitment equipment. Liquor and Gaming should publicise any penalties imposed to help support the development of a compliance culture amongst venues.*

7.3 Attitudinal/behavioural change – venue managers and staff

The attitudes and behaviours of venue managers and staff are not, in themselves, critical for YourPlay achieving its objectives, however they are important because they are a potential key influencer of EGM gambler behaviour. Venue managers and staff have the potential to increase the impact of YourPlay if they increase awareness of it amongst their patrons, and foster positive attitudes and beliefs towards pre-commitment and expenditure monitoring amongst EGM gamblers, and promote the use of YourPlay. Alternatively, if venue managers and staff hold incorrect beliefs about the operation of YourPlay or its targeted audience, or if they hold negative views about its use and effectiveness this could significantly reduce uptake and sustained use.

7.3.1 Understanding of YourPlay

Comparing the results of the qualitative research conducted with venue managers and staff in late 2016 with that undertaken prior to the launch of the scheme, it appears that the range of misconceptions regarding YourPlay that existed amongst managers and staff have been resolved, a notable success of the stakeholder management and communications activities (including the YourPlay Ambassador program).

The most common way managers reported receiving information was through emails from the Department of Justice and Community Safety. However, some managers and staff highlighted the value of face to face contact, and felt that it would be beneficial to have someone from the Department give them updates on the program.

Since the qualitative research with venue managers was undertaken the Department has implemented additional communication to venue managers and workers, including establishing a 'YourPlay Ambassador' program, to which representatives of each venue are invited, with meetings held several times a year. Venues

are also able to request YourPlay information sessions in their region if there are areas of policy of implementation they feel uncertain about.

Training (at least on the basis of the scheme and the technical aspects of gaming staff's role in its operation) has been delivered to all relevant staff. However, some staff reported that the low uptake of YourPlay has created difficulties for them in maintaining those skills.

The mystery shopping undertaken in early 2018 as part of this evaluation identified that, contrary to the feedback that had been received from venues and industry stakeholders, misconceptions around YourPlay were still relatively common amongst venue staff. Examples included staff telling researchers that they could only join YourPlay if they also joined the venue's loyalty scheme, staff believing that identification was required to receive any YourPlay card including casual user cards, staff asserting that anonymous use of YourPlay was not allowed, and staff reporting that the Government was using YourPlay to monitor individual's gaming spending.

The Department created an on-line training resource for YourPlay that is accessible to all gaming machine workers. However, whilst this was widely used at the inception of the scheme the comments from gaming room workers suggest that they may not be using it to maintain and refresh their skills. **An assessment of this training tool is undertaken in Chapter 9 of this report.**

Qualitative research undertaken with venue managers and gaming room staff in early 2018 indicates that those venues which sought training from the Venue Support Workers found this to be very valuable, however at the moment it appears that relatively few venues are seeking to access such training (see Chapter 10 of this report).

Recommendation 9: Ensure that gaming staff are aware of, and encouraged to use, the on-line training tools related to YourPlay to regularly refresh their skills on the technical aspects of YourPlay such as sign up and encoding cards. It would also be worth ensuring venues are aware of training and support available from venues support workers.

7.3.2 Promotion of YourPlay to gamblers

At the time of the qualitative research with venue managers and workers (October/November 2016) there was no evidence of staff having been trained in how to engage with gamblers to promote YourPlay, and this appears to be a gap in the current skill set of gaming workers. During the qualitative research, venue support workers reported that they felt that their training failed to address the customer service aspect in 'selling YourPlay.' This was borne out in consultations with venue managers and gaming staff who reported that they did not feel it was their role to 'encourage registration' as it was perceived as a delicate issue. However, they did feel that it was their role to raise awareness, more generally, about YourPlay.

One of the Department's strategies to address this lack of understanding about how to promote YourPlay, and facilitate use of it, is the YourPlay Ambassador program. The Department sought to identify a 'champion' for YourPlay in each venue in April 2016, with the first forums run with Ambassadors in July 2016, including providing professional development for the Ambassadors in subsequent forums. The Ambassadors program is also seen as a key channel of information into venues.

Venue managers and staff were generally very positive about the usefulness of the YourPlay Ambassadors program in the qualitative research undertaken with them in early 2018. However the widespread knowledge gaps and compliance failures identified during the mystery shopping suggest that in many venues this is yet to make an impact.

EGM gamblers interviewed individually felt that it should not be the role of staff to encourage use of YourPlay among individuals. They reported that they would feel very uncomfortable if staff came up to them to suggest they register. Interestingly, focus group participants expressed somewhat different views in that they felt that staff should talk about YourPlay in order to raise awareness. Further, focus group participants felt that venues should be actively promoting YourPlay.

In October 2016, the Department trialled a new, venue focussed, approach to promoting YourPlay, called YourPlay Day. This is an event held in venues where staff promote YourPlay broadly across patrons in the venue to ensure that anyone approached does not feel singled out or stigmatised. YourPlay Day appeared to have provided an avenue for staff to overcome the issue with promoting YourPlay as it prompted customers to ask staff questions about YourPlay, with patrons themselves starting the conversation in a causal way; and more importantly, no one in particular felt targeted. Therefore, venue staff, venue managers and venue support

workers felt more YourPlay days would be useful, and this may in part address the reluctance of staff to engage with gamblers. Subsequently, YourPlay Days have been held in April and October 2017 and July 2018. The impact of YourPlay Days is assessed in Chapter 11 of this report.

7.3.3 Attitudes to YourPlay

In general venue managers and staff have positive views of YourPlay, with the qualitative research finding that:

- Venue staff and venue managers were positive towards the idea of YourPlay and its potential benefit to gamblers (both at risk and not at risk), but were concerned with the low uptake.
- Venue staff and managers, as well as venue support workers, expressed the view that the pre-commitment scheme was a positive offering in that it gave them something less ‘extreme’ than self-exclusion to offer people.

However, as evidenced by that last set of attitudes there still appears to be a residual view that the predominant focus of YourPlay is on harm minimisation.

Recommendation 10: Review the communications to venue managers and gaming staff to ensure that the consumer protection elements of YourPlay are being given sufficient promotion.

7.3.4 Perceived barriers to use

In terms of barriers to uptake of YourPlay, managers and staff felt that ‘not at risk’ gamblers do not believe the scheme is targeted at them; while gamblers with impaired control do not want to know how much they are spending. Furthermore, venue staff and managers felt that gamblers did not want anyone else (particularly government agencies) accessing information on what they were spending with fears that this might affect their entitlements.

Some managers and staff also expressed a view that concerns about the pop-up messages, and the potential loss of privacy, were deterring gamblers from taking up YourPlay.

Many venue managers and staff members had no issues with the advertising material (including brochures and posters) and thought that the bright colours grabbed customers’ attention. However, some felt that the messaging was not clear, and reported that customers often assumed YourPlay was a new game coming out, or a promotion the venue was running. This lack of clarity amongst EGM gamblers as to **what YourPlay is** also arose in the research with gamblers.

Overall, EGM gamblers participating in our qualitative research felt that more communications were necessary in order to raise awareness of the scheme, and talked of the “*need to get it out there more.*”

Given the low level of awareness, focus group participants were shown the YourPlay posters and brochures. Overall, participants felt that the posters did not convey the message it was supposed to and some felt that the posters encouraged gambling.

7.3.5 Loyalty programmes

Staff reported that they promoted YourPlay to all of those who join their loyalty scheme and agreed that it was a useful pathway to promote YourPlay.

In contrast, the majority of EGM gamblers reported that they had not been offered (or did not remember having been offered) YourPlay when they registered for the loyalty scheme.

The experience of the researchers undertaking the mystery shopping as part of the evaluation (see Chapter 14) was that it was common for venues to offer loyalty programs **without** also offering YourPlay, or to offer YourPlay in a desultory way, for example a check box on the application for which gamblers could tick, but which was neither pointed out nor discussed by venue staff.

Recommendation 11: If the Department decides not to switch the link between loyalty schemes and YourPlay from opt in to opt out (recommendation 1) it will be important to ensure that venues are focussed on complying with the requirement to offer YourPlay to those joining loyalty schemes, ideally through compliance checks and enforcement activity.

7.4 Attitudinal/behavioural change – gaming machine gamblers

The extent to which YourPlay can achieve its objectives is fundamentally dependent on the awareness of YourPlay amongst EGM gamblers, and beliefs about pre-commitment and expenditure tracking generally, and about YourPlay in particular.

If gamblers are not aware of YourPlay then they cannot use it, regardless of what attitudes they hold regarding pre-commitment and expenditure tracking.

Similarly if gamblers do not believe that pre-commitment or expenditure tracking will deliver any benefits to them then they will not use a pre-commitment system. And if they hold the incorrect belief that the system is aimed only at those with gambling problems then take up is likely to be very limited (even amongst those with impaired control whilst gambling).

This means that the activities and strategies used to increase awareness of YourPlay amongst gamblers, and to ensure that they understand what benefits it can deliver and who it is targeted at, will be very important in driving usage.

7.4.1 Attitudes to limit setting and expenditure tracking

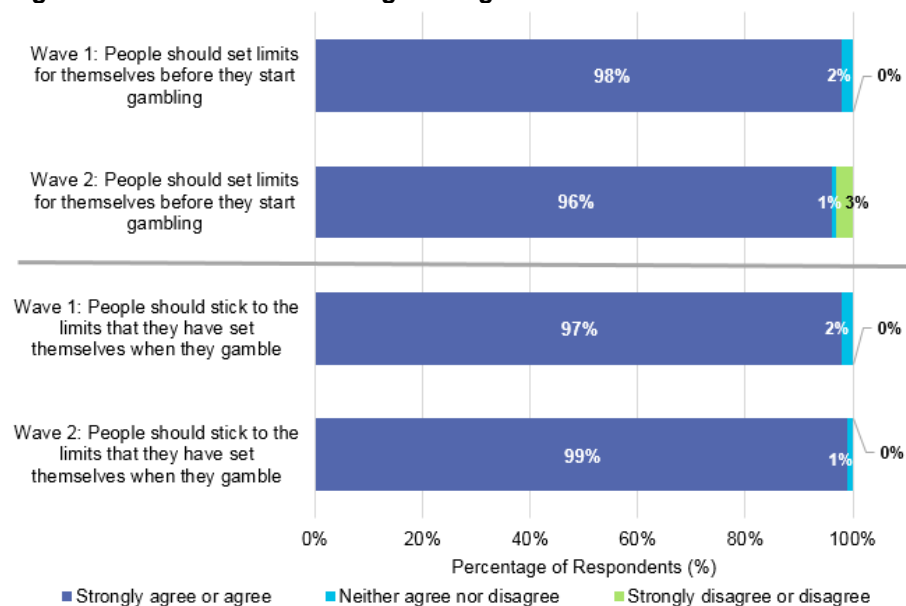
The broad concept that gamblers should set themselves limits for their gambling (whether in terms of money or time) and then stick to those limits had broad support amongst EGM gamblers responding to the telephone surveys undertaken as part of this evaluation, and these attitudes have remained fairly constant over the existence of YourPlay.

When asked if people should set limits for themselves before they start gambling, the majority (96 per cent) of respondents either strongly agreed or agreed with this statement. A further 1 per cent neither agreed nor disagreed and 3 per cent either disagreed somewhat or strongly disagreed (see Figure 7.1).

When asked if people should stick to the limits they set themselves when they gamble, nearly all (99 per cent) respondents either strongly agreed or agreed with this. Only 1 per cent neither agreed nor disagreed with this statement. There were no subgroup differences by PGSI status.

Actual behaviours differed somewhat from this strong in-principle support (Figure 7.2). When asked how often they set themselves a time limit when playing pokies, one half (50 per cent) said that they ‘never’ set themselves a time limit. One in ten (10 per cent) mentioned ‘rarely’ setting themselves a time limit, the same proportion (10 per cent) said ‘sometimes’ and 28 per cent said that they ‘often or always’ did. Two per cent of respondents said that the statement did not apply to them. Use of money limits were much more common with three quarters of respondents saying that they ‘often or always’ set themselves a limit for money and only 7 per cent of respondents indicated that they ‘never’ set themselves a money limit.

Figure 7.1 Attitudes towards gambling

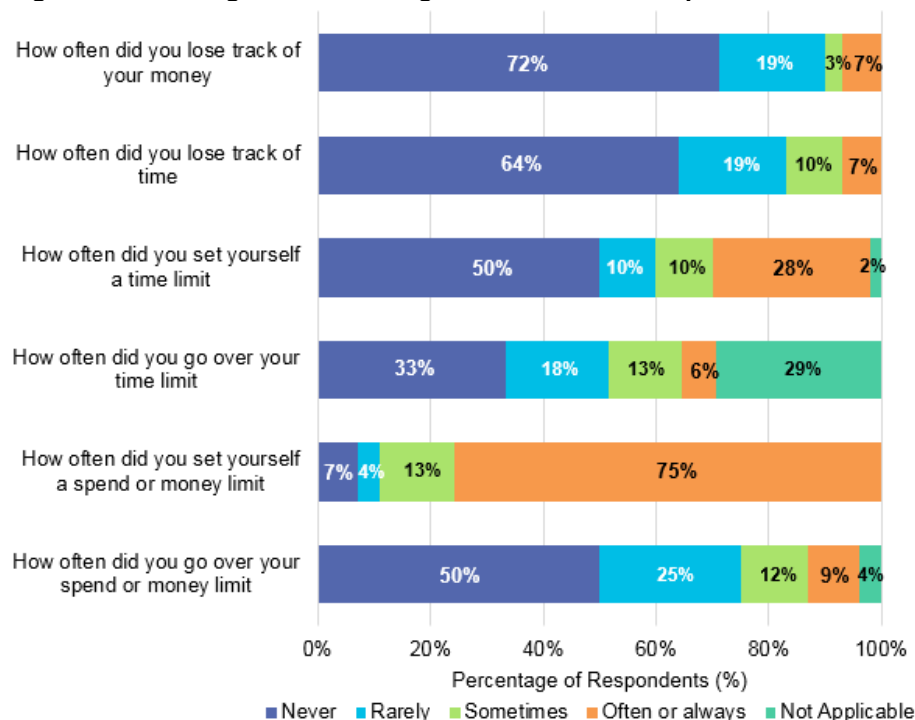


QD1a. People should set limits for themselves before they start gambling. Would you say strongly agree, agree, neither agree nor disagree, disagree, strongly disagree? (Wave 1 n= 599 excluding 'don't know'; Wave 2; n=337 excluding don't know)
 QD1b. People should stick to the limits they have set themselves when they gamble. Would you say ...? (Wave 1 n= 599 excluding 'don't know'; Wave 2 n=339)

When respondents were asked how often they lost track of their *money* when playing pokies, nearly three quarters (72 per cent) of respondents felt that they ‘never’ lost track of their money. A further 19 per cent felt that they ‘rarely’ did, 3 per cent said ‘sometimes’, and 7 per cent said that they ‘often or always’ did.

Nearly two thirds (64 per cent) of respondent believed that they ‘never’ lost track of *time* when playing pokies. A further 19 per cent mentioned ‘rarely’, followed by 10 per cent who said ‘sometimes’, and 7 per cent who said ‘often or always’.

Figure 7.2 EGM gamblers’ management of time and expenditure



QA6. When playing pokies during the last 12 months ... (n=339)

Respondents were then asked how often they went over their time limit, one third (33 per cent) of respondents felt that they ‘never’ did, this was followed by 18 per cent who said ‘rarely’, 13 per cent said ‘sometimes’ and 6 per cent said that ‘often or always’. Three in ten (29 per cent) said that the statement did not apply to them.

Respondents were more positive about their success in sticking to their own spend or money limit, one half (50 per cent) of respondents believed that they ‘never’ went over it, one quarter (25 per cent) felt they ‘rarely’ did, 12 per cent said that they ‘sometimes’ did and 9 per cent said ‘often or always’. Only 4 per cent felt that the statement did not apply to them.

7.4.2 Awareness of YourPlay

The evaluation of the communication campaign for YourPlay¹⁰, – undertaken after the mass market media campaign had concluded – found awareness of *any* pre-commitment system among regular EGM gamblers in Victoria was only 13 per cent in June 2016 (down slightly from 16 per cent at the October 2015 benchmarking survey prior to the launch of YourPlay, although the difference was not statistically significant). Only 11 per cent reported that they were aware of a *new* pre-commitment initiative. This would seem to suggest that the mass market communications activity did not have a significant impact on the regular EGM gamblers surveyed by Orima (although it is possible that there was an impact amongst less frequent gamblers who were not included in Orima’s sample frame).

The results of the two surveys undertaken as part of the overall evaluation of YourPlay (the findings of which are set out in Reports 3 and 5 of the evaluation) are somewhat more positive with overall awareness reported to be considerably higher at 37 per cent of EGM gamblers (up slightly from an awareness of 32 per cent at wave 1 in June 2016, although this difference is not statistically significant). The results from this telephone survey are not directly comparable with the evaluation of the communications campaign as the Orima research

¹⁰ Orima Research (2016) ‘2016 YourPlay Communication Campaign, Quantitative Campaign Effectiveness, Research – Draft Report, FINAL, September 2016

was assessing unprompted recall whereas the telephone survey mentioned YourPlay by name, however they both point to a level of awareness amongst EGM gamblers that is relatively low.¹¹

It is also of concern that in the results of the telephone survey reported awareness declined with problem gambling status (whilst 41 per cent of 'no risk' gamblers reported being aware of it, this fell to 31 per cent among low risk gamblers and 34 per cent of moderate risk/problem gamblers). One of the two benefits targeted by YourPlay is a reduction in the harms from gambling, and the other is to support gaming machine gamblers in making better informed decisions about their gambling. As such, higher levels of awareness (and use) of YourPlay amongst more frequent and/or higher risk gamblers is likely to increase the scheme's benefits, whereas at the moment the opposite is the case (see the text box below for more details of why this is a concern).

Our qualitative research with gamblers also found a significant amount of confusion about what YourPlay actually was, with some of those respondents who had indicated that they were aware of YourPlay in their response to the telephone survey believing that it was the name of a loyalty scheme when their awareness was tested during the qualitative research.

Among those who were aware of YourPlay, and knew that it was a pre-commitment scheme, the focus was on the function of setting limits for expenditure, rather than tracking spend and/or setting limits for the amount of time spent.

Recommendation 12: The Department should consider further testing of the promotional materials for YourPlay (mass market and in-venue) to ensure that they accurately convey to gamblers what YourPlay is and who it could help.

These two sets of estimates of awareness (and particularly the lack of change over time) raise questions about the effectiveness of the large scale mass media focussed communications campaigns undertaken for YourPlay to date.

Recommendation 13: We recommend that further mass market awareness/promotion campaigns for YourPlay are only undertaken after an assessment of their relative reach with the target audience of EGM gamblers (particularly higher risk and higher frequency gamblers), and relative cost effectiveness of a mass market campaign, compared with other approaches to marketing the scheme.

Awareness by gambling risk level and why it is important.

Given that YourPlay is explicitly targeted at *all* EGM gamblers regardless of their risk level, an obvious question is why a lower awareness rate amongst low risk, medium risk and high risk gamblers is a concern. There are several reasons for this.

First, the consumer protection benefits largely relate to helping those who lose track of the time they spend playing or their expenditure whilst playing (this could be through the spending updates during play, or through the information provided in the annual statements). Gamblers who are 'no risk' gamblers account for a proportionally small share of those who have reported ever having lost track of time or money, with only 30 per cent of those who have ever lost track of time, and only 17 per cent of those who have ever lost track of money being non-problem gamblers (see Tables 7.1 and 7.2). This means that if use of YourPlay is heavily weighted towards this group, it is likely to only deliver a small share of the potential consumer protection benefits.

Table 7.1 Responses to the question 'How often do you lose track of time when gambling', by gambling risk category, estimates grossed up to Victorian totals

	Non-problem gamblers	Low risk gamblers	Moderate risk gamblers	Problem gamblers	Total
Total ever lost track of time (number) ^a	53,224	63,990	45,520	18,526	181,259
% of total ever lost track of time	29.4	35.3	25.1	10.2	
Total often or always lost track of time	7,755	6,811	23,973	12,264	50,803
% of total often or always lost track of time	15.3	13.4	47.2	24.1	

Note: Respondents who had gambled on an EGM at least once in the last 12 months, n = 2,269

^a Responded 'rarely', 'sometimes', 'often' or 'always'

Source: Schottler Consulting, Victorian Gambling Survey Data, data extracted by SACES

¹¹ The equivalent, unprompted, awareness of YourPlay in the tracking component of the Communications Evaluation was 10 per cent (up from 3 per cent at the October 2015 benchmarking).

Table 7.2 Responses to the question ‘How often do you lose track of your money when gambling’, by gambling risk category, estimates grossed up to Victorian totals

	Non-problem gamblers	Low risk gamblers	Moderate risk gamblers	Problem gamblers	Total
Total ever lost track of money (number) ^a	20,465	46,302	36,561	18,214	121,543
% of total ever lost track of money	16.8	38.1	30.1	15.0	
Total often or always lost track of money	3,177	1,084	1,877	9,614	15,752
% of total often or always lost track of money	20.2	6.9	11.9	61.0	

Note: Respondents who had gambled on an EGM at least once in the last 12 months, n = 2,269
^a Responded ‘rarely’, ‘sometimes’, ‘often’ or ‘always’

Source: Schottler Consulting, Victorian Gambling Survey Data, data extracted by SACES

Second, although achieving consumer protection benefits is given the highest weighting in the Benefits Realisation Plan, YourPlay is also seeking to “contribute to a reduction in the harm gamblers do to themselves and others (long term change)”.

There are several ways in which YourPlay could potentially reduce the harms arising from EGM gambling (see Figure 2.3 for details), but in each case the level of harm reduction that can be achieved will depend on use of YourPlay by low risk gamblers, medium risk gamblers and problem gamblers, as only minor (or indeed no) gains could be expected in terms of harm minimisation from no-risk users.

The first, and most direct, way in which YourPlay could reduce the harms from gambling is by reducing the extent to which low risk, medium risk and problem gamblers experience impaired control in their gambling. This could be through gamblers ceasing to gamble when they have reached a pre-commitment limit, or due to the amount spent, or time spent, being identified to them through one of the regular pop-ups. This form of harm minimisation benefit can only be realised by those who are already experiencing some degree of impaired control, e.g. low risk gamblers, medium risk gamblers and problem gamblers.

The second way in which the program could deliver harm minimisation benefits is if it provides information to gamblers who are experiencing impaired control which assists them in recognising there is a problem with some of their gambling behaviours. Again this form of benefit can only be realised by those who are already experiencing some degree of impaired control, e.g. low risk gamblers, medium risk gamblers and problem gamblers.

Finally, YourPlay could reduce harms from gambling by reducing the number of gamblers who progress to a higher level of problem gambling risk. This benefit will potentially assist gamblers of all risk levels (including ‘no risk’ gamblers) however transitions from ‘no risk’ gambling to problem gambling are rare, with the majority of transitions to problem gambling coming from moderate risk gamblers.

For example, amongst the respondents to the Victorian Gambling Study (Billi et al. 2014, p.40) only 0.1 per cent of ‘no risk’ gamblers had transitioned to problem gambling between wave 1 and wave 2, compared with 0.7 per cent of low risk gamblers and 8.3 per cent of moderate risk gamblers.

Therefore whilst all Victorian Gamblers can potentially gain some benefits from YourPlay, the magnitude of those potential benefits will be greater for low risk, moderate risk and problem gamblers. And this in turn suggests that the program will achieve greater impact if awareness and use of YourPlay is greater amongst those gamblers facing at least some degree of impaired control.

None-the-less, there appears to be considerable scope to increase awareness and understanding of YourPlay amongst Victorian EGM gamblers. Not least because 26 per cent of those who reported being aware of YourPlay but not having used it, gave their reason as “Haven’t seen/ heard enough about it” (interestingly 18 per cent of those who reported being aware of YourPlay when asked why they didn’t use it reported that they were “Unaware of YourPlay/ didn’t know about it”).

Future campaigns may perhaps be more effective if the focus is on delivering messages in venues through trusted intermediaries, and if the communication targets the broader benefits such as tracking spend.

Recommendation 14: *The Department should explore who would be seen as a trusted source of information by EGM gamblers and seek to use them as a channel to increase awareness of YourPlay.*

Recommendation 15: *The Department should assess the ways in which YourPlay is promoted in venues to ensure that the most effective channels are being used.*

7.4.3 Attitudes towards YourPlay

In the qualitative research, where their attitudes could be explored in more depth, gamblers were positive, on the whole, about YourPlay and its objectives.

There were mixed views about the specific details and functionality of the scheme, particularly the fact that the limit can be over-ridden when reached, with a majority of focus group participants indicating that they believed that this rendered the scheme useless. On the other hand, a minority of respondents agreed with the voluntary nature of the scheme, and had an attitude that it supported individual choice and responsibility.

The main barrier to uptake among gamblers was the fact that people did not believe it was aimed at them, or that it was unnecessary for them/of no use to them. Gamblers perceived that the target audience for the scheme was problem and at risk gamblers. Some respondents also specifically mentioned that they felt that the scheme was aimed at older people and/or lower income groups, who spend significant amounts of time gambling on pokies.

Less frequent, but still present, was a concern that using YourPlay would potentially stigmatise gamblers by flagging up that they had a problem (there appeared to be a widespread misunderstanding that YourPlay used a specific card distinct from loyalty scheme cards), or that privacy could be breached because other patrons could see their spending because of the pop-up.

Some respondents expressed the view that YourPlay would not be effective for any category of gambler. They did not believe that the scheme would be useful for non-problem/non at risk gamblers, as they felt that they would not use it. They also pointed out that the limit could be over-ridden, or that people could move on and gamble elsewhere, stopping it from being useful for those with a gambling problem (NB YourPlay is not targeting problem gamblers as a population with which it expects to achieve substantial change, due to its entirely voluntary nature making it not well suited to assist problem gamblers alter their behaviour. However the view amongst gamblers consulted was that this was a core focus of the scheme, and that it was not well suited to achieving it).

7.4.4 Use of YourPlay to better understand and manage gambling

Results of the survey of YourPlay card holders (summarised in Chapter 15) suggest that many of those actually using YourPlay find it useful as a tool to monitor and manage their gambling. Twenty eight per cent of respondents who answered the question on impact reported that YourPlay meant they were “a great deal” or “quite a lot” better informed about their gaming machine spending, and 29 per cent reported that using YourPlay meant that it was “a great deal” or “quite a lot” easier for them to stick to the limits that they set for themselves.

However as rates of adoption, outside of those using the scheme to access unrestricted machines in the Melbourne Casino, are very low in almost all venues not many gamblers outside of the Melbourne Casino are realising these benefits.

In the development of YourPlay it was generally agreed by stakeholders, including industry stakeholders that loyalty schemes would be one of the most important drivers of sign-up to YourPlay. And to support this it is a requirement of the relevant regulations that when someone is joining a loyalty program that they be offered YourPlay.

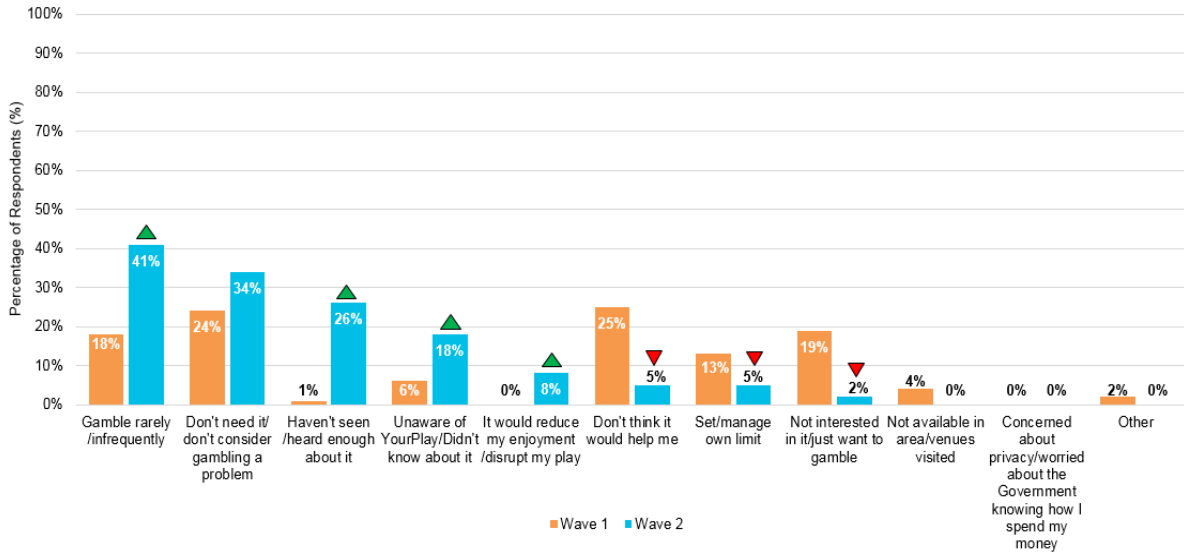
However, with the exception of the Melbourne Casino (where the requirement to have YourPlay with a time or money limit set in order to activate the unrestricted mode on machines creates a different dynamic), loyalty schemes do not appear to have acted as a driver for YourPlay sign-up.

Indeed, all data collections undertaken with gamblers (the telephone surveys, the qualitative research with gamblers and the survey of YourPlay cardholders) found that gamblers frequently reported that they had not been offered YourPlay when joining the loyalty program.

7.4.5 Reasons gamblers gave for not using YourPlay

The most frequent reason given for not using YourPlay amongst those who said they were aware of it was that they gambled rarely or infrequently (41 per cent). Around one third (34 per cent) of respondents felt that they didn't need it or didn't consider gambling to be a problem, 26 per cent of respondents said that they hadn't seen or heard enough about it and 18 per cent were unaware of YourPlay or didn't know about it. More than one response was allowed.

Figure 7.3 Reasons for choosing not to use YourPlay



QD4. Why have you not chosen to use YourPlay? Code frame was not read out and multiple responses were allowed (Wave 1 n=172; Wave 2 n=103)

A potentially interesting finding of the telephone survey was that from wave 1 (May 2016) to wave 2 (May 2017) there was a big drop in those responding that the reason they hadn't tried YourPlay was "Don't think it would help me", from 25 per cent to 5 per cent. If this is a genuine change in sentiment (rather than just a change in the way in which lack of interest is reported) then it may be that there is more scope now to persuade potential users of its benefits than there was early in the scheme's life.

Part C Factors Influencing Usage

8. Usage of YourPlay

8.1 Use of YourPlay in gaming venues

Usage of YourPlay by Victorian electronic gaming machine players is very low, particularly outside of the Melbourne Casino (where the requirement to gamble using a YourPlay Card in order to access unrestricted machines provides both the venue and players with an apparently strong incentive to facilitate use).

It is not possible to identify the number of unique *persons* using YourPlay, or indeed gambling using electronic gaming machines in Victoria. We do have a count of ‘players’ for YourPlay but for casual cards this is the number of unique cards used rather than the number of players, and as such is likely to be higher than the actual number of unique persons as some users of YourPlay will have more than one YourPlay card. As such the most important metric for the reach of YourPlay is its relative usage, e.g. the proportion of total EGM turnover (e.g. the total amount gambled by gamblers in sessions, including any re-invested winnings) in venues spent by those using a YourPlay card.

Overall statistics on YourPlay usage are shown by venue type for the three full calendar years that YourPlay has operated. Total net player loss (the turnover minus any wins including jackpots) and turnover were down sharply in 2018 due to a significant fall in YourPlay expenditure at the Melbourne Casino. Expenditure whilst using YourPlay in both clubs and hotels is higher than it was in 2016 although it still only accounts for a very small share of expenditure.

Year	Indicator	Casino	Club	Hotel
2016	Number of players whose first session was in the year	10,630	2,233	2,721
	Total number of YourPlay sessions in year	2,017,300	21,133	21,954
	Total net player loss whilst YourPlay card in play (\$)	439,175,461	43,259	60,027
	Total gaming machine turnover whilst YourPlay card in play(\$)	4,330,110,001	437,951	570,916
2017	Number of players whose first session was in the year	8,246	2,275	2,950
	Total number of YourPlay sessions in year	2,135,230	33,442	31,469
	Total net player loss whilst YourPlay card in play (\$)	312,935,340	195,231	114,503
	Total gaming machine turnover whilst YourPlay card in play(\$)	3,677,055,162	2,224,756	1,256,517
2018	Number of players whose first session was in the year	8,203	3,453	3,893
	Total number of YourPlay sessions in year	2,216,812	29,503	25,558
	Total net player loss whilst YourPlay card in play (\$)	193,729,652	177,205	168,577
	Total gaming machine turnover whilst YourPlay card in play(\$)	2,289,829,691	1,948,132	1,505,477

Figure 8.1 shows the distribution of total gaming turnover in hotels and clubs over the financial year 2017/18 for those gaming sessions when a YourPlay card was in play. 166 venues had no recorded YourPlay turnover in that year, and a further 71 venues had turnover over the year of \$1 to \$99. Only 9 venues had YourPlay turnover over the whole year that was \$100,000 or more. In comparison, the **total** annual gaming turnover of Victorian hotels and clubs ranged from \$560,000 to \$237 million per hotel or per club.

The minimal share of turnover spent by those using a YourPlay card is best illustrated by the distribution of venues by the percentage of their turnover spent by those using a YourPlay card, see Figure 8.2. For a significant majority of Victorian hotels and clubs – 87 per cent – the share of their expenditure made by YourPlay users was less than \$1 in \$10,000 (including 166 of the 498 venues included in the VCGLR data for 2017/18 which had no YourPlay expenditure at all in 2017/18).

There were only 16 venues where more than 0.1 per cent of their turnover was from YourPlay users, and the highest share is 0.8 per cent of turnover. This maximum share of turnover is lower than was the case in 2017, whilst the same venue has retained the status as the best performer, its share of turnover has become less exceptional and more in line with other high performing venues.

Figure 8.1 Total annual gaming turnover is sessions when a YourPlay card is in play, 2017/18, Hotels and Clubs

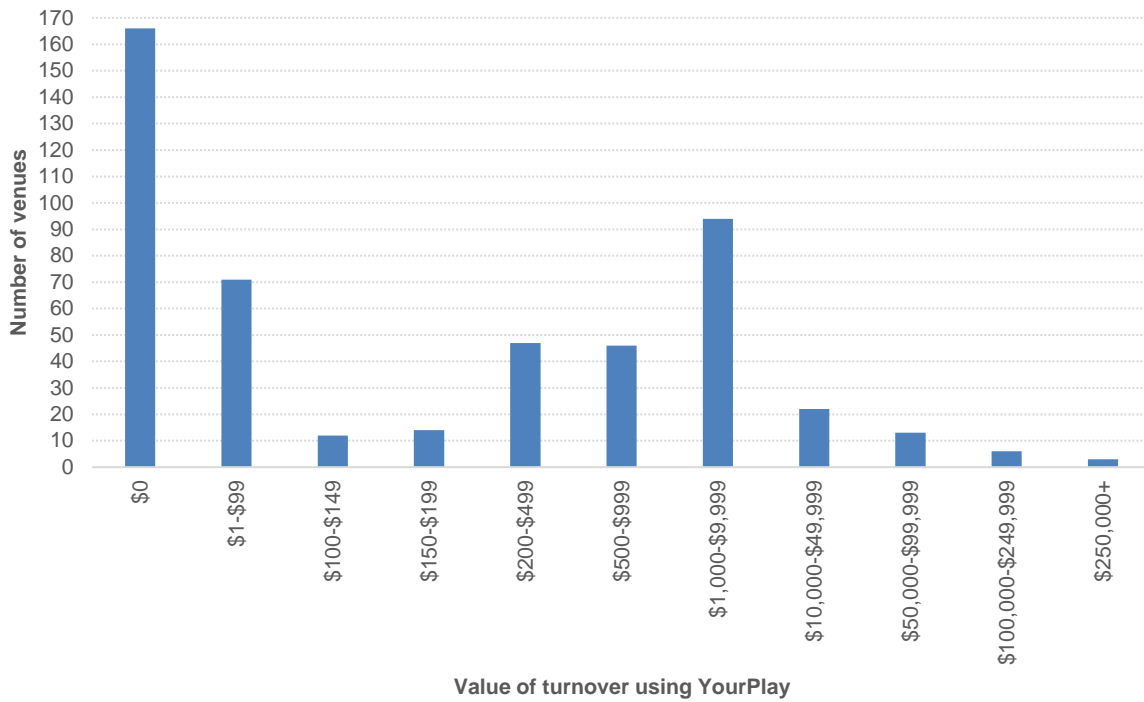
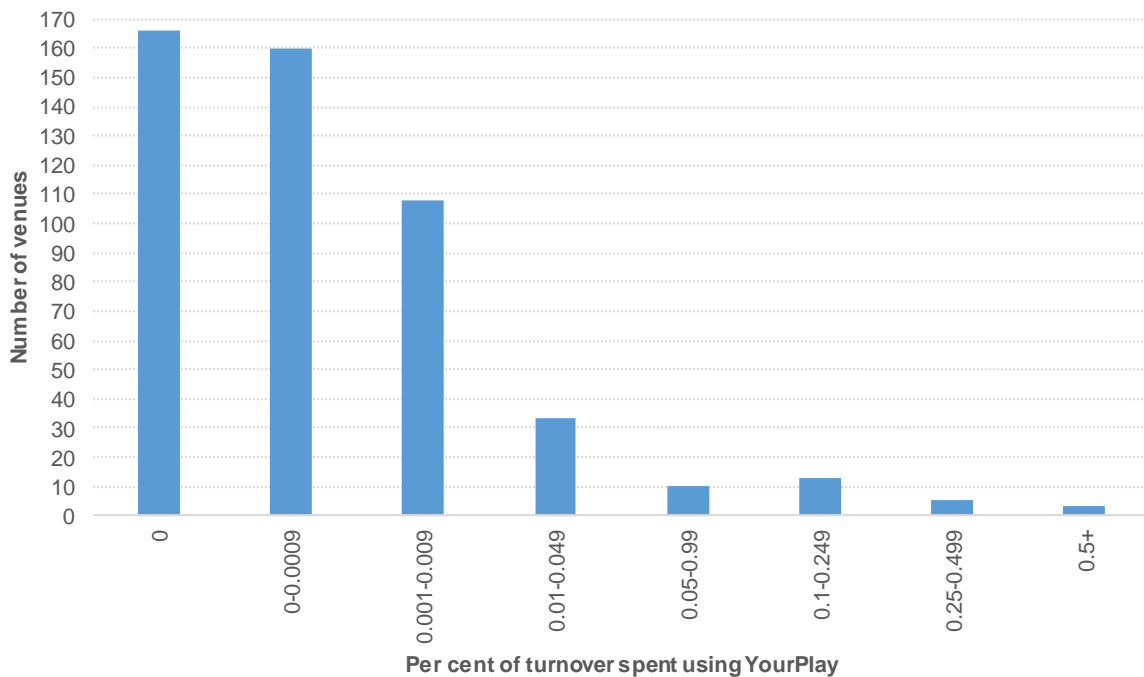


Figure 8.2 Proportion of venues' turnover spent using a YourPlay card, hotels and clubs, 2017/18



8.2 Limit setting

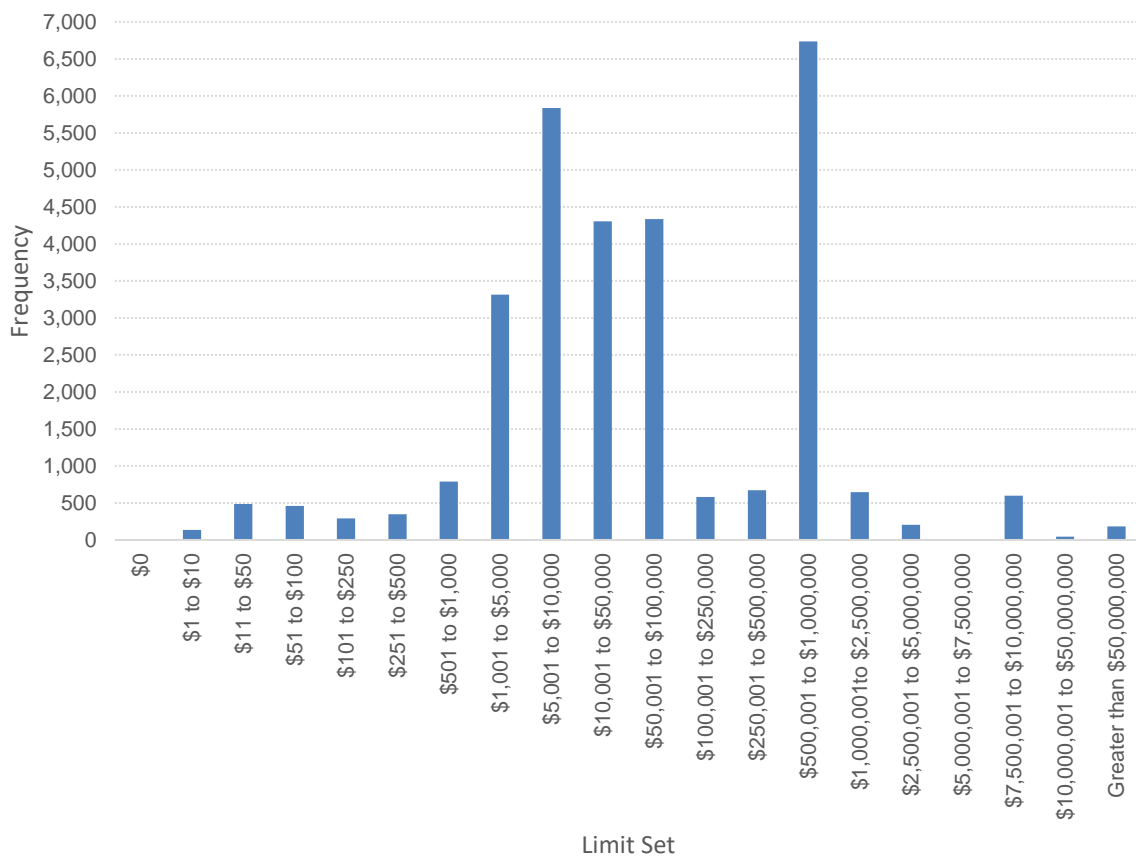
In the design of the system the ability of gamblers, should they choose, to set their own limit for amount of money spent (per day or per week) and time spent gambling was considered to be the most likely route to realising harm reduction. However it was also understood that the voluntary nature of the scheme, together with the ability to override a limit and keep gambling with the YourPlay card in play, reduced the potential effectiveness of any harm reduction (and it is for these reasons that the system design focuses primarily on consumer protection impacts).

Despite the considerable flexibility built into the limit setting process (and its non-binding nature, although once past the limit over limit warnings do pop-up regularly) a significant proportion of those choosing to set limits choose a daily loss limit that is effectively non-binding (or indeed in some cases could not be reached even at 24 hours of continuous play at the maximum bet level).

This analysis focuses on the daily loss limit as that is much more common than weekly limits, and includes all of the limits current as at January 2018. The median limit chosen by YourPlay cardholders was \$50,000, however 8,301 of the 29,992 gamblers who set a limit chose a daily loss limit that was \$500,000 or higher. **The most common individual value (also known as the mode) for daily loss limits was \$1,000,000.** The full distribution of limits set is shown in Figure 8.3.

This suggests that in practice the limit setting features is unlikely to have much, if any, impact on harm reduction as it will not even be able to fulfil an information provision function as most gamblers would have experienced significant financial harm before they hit the loss limits generally set (e.g. it is extremely unlikely that these extreme values represent the genuine daily affordable loss limits for all but a few high rollers), indeed in some cases the limits could never be reached, and as players are extremely unlikely to actually reach these limits they are not provided with the warnings at 70 per cent and 90 per cent of their limit.

Figure 8.3 Distribution of daily loss limits set for YourPlay cards as at January 2019



9. Review of Gaming Worker Training

9.1 Overview

Online training is made available to provide venue workers with details of how YourPlay operates, and this represents the main mechanism for ensuring gaming workers understand YourPlay and have the skill needed to implement it (including promoting it to gamblers).

The training takes the form of a series of short information modules which can be undertaken at the worker's own pace ('self-paced'). These modules include paragraphs of information, interactive displays, a short video as well as links to other information sources, including the YourPlay brochure and the YourPlay website that contains a detailed Frequently Asked Question (FAQ) section.

To examine the quality and validity of this training, the researcher undertook the training themselves. Each module was read carefully, each link and information source was studied and the quizzes were successfully completed at the end. From this review, it was possible to gauge the thoroughness and clarity of the information; the functionality of the training portal; the rigour of the assessment material; and the extent to which the training is likely to encourage responsible gambling and harm minimisation approaches in relation to customers.

9.2 Quality of the information

On the whole, the information provided in the online training portal appears to be comprehensive and clearly organised. There is a brief overview of YourPlay and the design features, navigational structure and functionality of the training portal and then a series of three training modules: Set, Go, and Support. Users of the website are told that they will have to read through the information in the modules and then answer a series of questions at the end and get 80% correct to pass the course. Repeated attempts can be made if they do not pass on the first occasion.

Learning Outcomes

Each module commences with a statement of learning outcomes. Examples of these statements are provided below. These are generally clear and comprehensive and appear to capture the content which is contained within the modules themselves.

Broad learning outcomes:

- Identify and explain the methods for players to register for YourPlay.
- Follow the process for registering a player with YourPlay via the venue portal.
- Identify different options for cards players can use for YourPlay and explain their key features to players.
- Encode and issue a card to players.

Go Module learning outcomes:

- Recognise messages players will see during play.
- Be able to explain briefly to a player what actions they can take if they reach a limit.
- Recognise what messages a player would see if the YourPlay system is unavailable and understand what to do if they come to you for help.
- Recognise the message a player would see if their account is locked, plus be able to follow the process to help a player reset a PIN.
- Be able to explain to a player what to do if they get a message that the YourPlay account is cancelled and help them reactivate if they want help.

Support Module learning outcomes:

- Do I understand the various methods for players to register for and use YourPlay or get help? (Read through this Support module).
- Am I clear on what my role is in helping players register for and use YourPlay? (Refer to the Overview for responsibilities).
- Do I understand the steps to help a customer use YourPlay? (Refer to the Register, Set and Go modules).
- Is it clear to me what technical support is available for YourPlay and who should I call if there is a problem? (Refer to the Technical and Troubleshooting FAQs in this module).

- Do I have enough information to answer common player questions? (Refer to the General YourPlay FAQs in this module and the player FAQs at yourplay.com.au).

Screen lay-out

Information can be read directly from the screen or the user clicks on particular icons or is directed via a URL to a website with additional information. One short YouTube style video of around 2 minutes duration is accessible via a link. Examples of the format are provided in Figures 9.1 to 9.3.

Figure 9.1 Screen-shot of portal layout



Figure 9.2 Screen shot of information on limit type

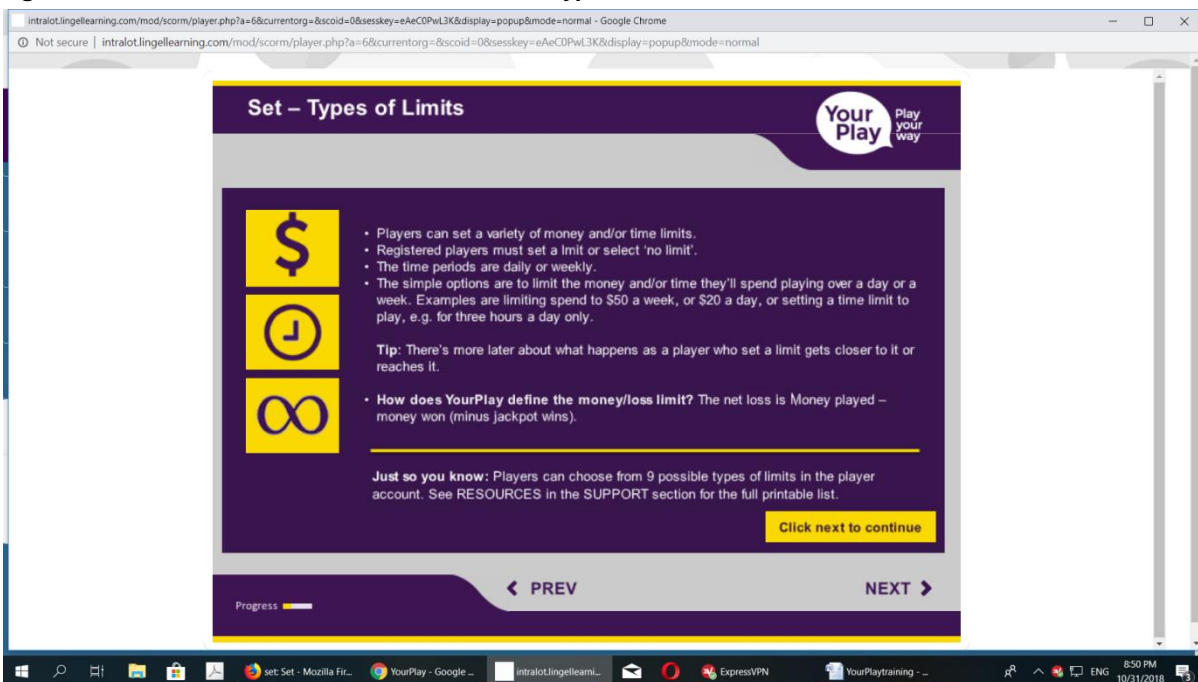
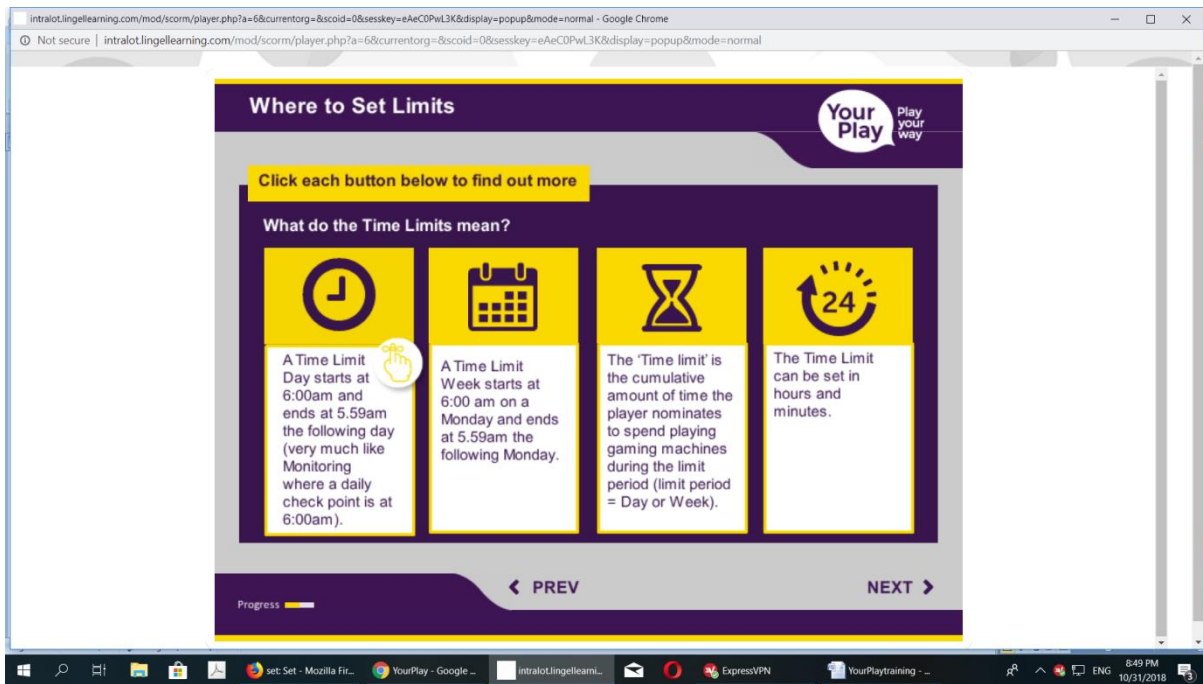


Figure 9.3 Screen shot of limit setting information



Linked material

Users are able, during the course of the training, to click on links to the YourPlay website which contains all the details of how to set up a card; what personal details must be entered; and a series of FAQs. An example of some of this material (for registering) is provided below and this is generally clear and comprehensive.

Q. Do I have to give my personal details to register with YourPlay?

A. Yes. Registering does mean providing your name and postcode. But a unique ID, not your name, is used to link your YourPlay account across any cards you use at any venues you visit. Please read our [Privacy Policy](#) if you have any concerns. **Tip:** You could take the casual card option if you want to play completely anonymously. Note that you lose the history of your play if you lose a casual card.

Q. Where do I get a card?

A. You can get a card to access YourPlay at any gaming venue, including the Melbourne casino. YourPlay is available on venue cards, not a separate card. Remember, you need to register first. You can do this online, at a venue, or via the YourPlay Help Desk (Call 1300 838 031, 10am-6pm, every day). **Important tip:** Bring some ID like a recent utility bill or a driver's licence when you pick up your card. It needs to show your name exactly as you registered it. **Note:** You can pick up a casual card any time at venues, but you will lose the history of your play if you lose it.

Q. What if I just want to try YourPlay first without registering any personal details?

A. Every venue will have casual cards you can use anonymously. Remember though, that casual cards can't be replaced, so if you lose your card, you will lose the history of your play. **Handy tip:** You can always register a casual card. Just bring the card and ID like a driver's licence or a recent utility bill to a venue.

Clarity of the information

It was generally easy to follow most of the information. However, some sections required some greater concentration and effort and would probably be difficult to comprehend if viewed on anything other than a large PC screen. For example, in one module, there is a table depicting limit changes and how long it takes for each of the changes to come into effect. The formatting is not conducive to an easy understanding of the content because of the lack of colour differentiation in the rows and columns and the level of detail in the table. In essence, it tries to capture the fact that limit changes occur within a 2 x 2 decision-making matrix. Players are either AT their limit or NOT AT their limit when they make a decision. They are also either trying to increase their limit or 'tighten it' or 'loosen it'. This is not really explained in the training and has to be inferred from the table. Tightening would involve going from No limit to having a limit or going from Weekly to Daily on either Time or Money (or both). It would appear that attempts to tighten limits are effected immediately, whereas decisions to loosen one's limit take longer, e.g., if one attempts to loosen a daily limit, one will wait 24 hours, whereas changes from a weekly limit to others require having to wait until the next Monday at 6am. It was felt that this section could have more explanation and examples as well as some interactive scenarios to make it clearer to workers.

Figure 9.4 Limit changes

Current limit & Status	New Limit			
	Daily (tighten)	Daily (loosen)	Weekly	No Limit
Daily (within limit)	Immediately	After 24 hours	After 24 hours	After 24 hours
Daily – (limit has been reached)	The new limit will appear immediately on the PIM screen but the activity will only be reset at the end of the current period.			
	Weekly (tighten)	Weekly (loosen)	Daily	No Limit
Weekly (within limit)	Immediately	Monday 6:00 AM or after 24 hours, whichever is greater	Monday 6:00 AM or after 24 hours, whichever is greater	Monday 6:00 AM or after 24 hours, whichever is greater
Weekly (limit has been reached)	The new limit will appear immediately on the PIM screen but the activity will only be reset at the end of the current period.			
	Daily	Weekly	Not Applicable	Not Applicable
No Limit	Immediately	Immediately	Not Applicable	Not Applicable
Daily Limit (Activity Reset):	Every day 6:00AM			
Weekly Limit (Activity Reset):	Every Monday 6:00AM			

The other aspect of limit-setting that was somewhat unclear related to statements about the variety of limits that can be chosen. During the modules, there was mention of nine different limit types, but it was not entirely clear how the figure of nine was obtained. For example, it is possible to work out that there are two Time limit types (Weekly or Daily) and two Expenditure limit types (Weekly or Daily), which need to be combined if a limit is being set (e.g. a person setting a limit must have both a time and an expenditure limit) giving four limit type combinations. There is then the option of not having a limit (No limit) and giving five feasible combinations.

Factual vs Illustrative content

The information is largely factual. There is a lot of information about the purpose of YourPlay, the principles governing its use and what options are available. Much less information, however, is provided regarding the sequencing of information or how it might work in practice. For example, there are no videos or pictorials showing how each process might be undertaken by a specific patron. There are no photos of the kiosks to allow users (potentially sitting at home) to visualise what kiosks look like, where they are likely to be found, and the physical layout of the set-up itself. The training could, therefore, have made greater use of videos or other suitable content to illustrate the key points.

9.3 Functionality and usability

The online training portal generally works well, although there are occasional places where clicking on one piece of information progresses the user back to an earlier section. The course is generally easy to undertake on a PC, but based on this review it is not clear how easy it would be to complete it on other devices, such as iPads and iPhones. Some of the more detailed information would be difficult to read unless the screen is quite large and there is a need to switch between different screens when certain icons are activated or certain links are followed.

9.4 Rigour of assessment

The assessment for the course is very short. There are simple multiple choice quizzes at the end of two of the modules and these comprise between 3-5 questions. Each of them is factual in nature and generally does not require very much problem-solving. It is relatively easy to score 80% and then very easy, if one gets an answer wrong, to go back and redo the same quiz immediately without having to review any course material. The researchers felt that this assessment was much too parsimonious and did not really capture very many of the learning areas outlined for each module. A better assessment would contain more like 15 questions and require greater reflection on the material. In actual venue environments, workers are likely to be 'put on the spot' and will need to consider situations that might require some interpretation and problem solving (e.g., Patron A wants to do X, but not Y and would prefer to receive the activity statements in a different way). Some case-studies would have been useful in this context. For example, a more detailed scenario could have been presented and then a series of questions could have been asked. Another issue is that the assessment is only provided once after the course is done, so that it does not test whether there is any retention of information over time.

9.5 Consistency with principles of responsible gambling/harm minimisation

A number of studies have recognised that there are two fundamental challenges associated with implementing voluntary pre-commitment schemes (Delfabbro, 2011; Delfabbro et al., 2007, 2016). The first is that workers find it very difficult to talk to patrons or to approach them. The second is that many people do not believe that they need to set any limits because they do not believe themselves to have any difficulties with their gambling. The first issue relates predominantly to the challenges associated with problem gambling and is not immediately relevant to YourPlay because of its focus on a range of gamblers. However, communication with patrons would inevitably involve some contact with problem gamblers, so that some awareness of the challenges of speaking to patrons about the potential value of the different limits when they express interest would seem worthwhile. For example, staff should adopt a style of communication that is not judgmental, does not try to sell the service, and which frames the value in terms of the needs of the player. The second issue is addressed in a similar way. It is very important for staff to be able to underscore the broader purpose of the feature so as to make it appealing to potential non-problem gamblers, e.g., ‘I have been thinking about using this, but I am not sure. What can you tell me about it?’

The training (if this is the only material provided) **may not prepare staff for this type of interaction**: what language to use; how to frame their responses; and how to deal with more complex queries. Although many people may sign up online or not have to interact with staff to learn about YourPlay, they will still have to pick up the card and may sometimes ask staff for advice on changing limits or about other features. Such discussions may come up, for example, if a person openly expresses concerns about their own gambling to staff and what they might do.

On the whole, the messaging used around YourPlay is consistent with good practice recommendations from other studies (Delfabbro, 2011) in that it avoids language relating to ‘responsible gambling’ which can sometimes be considered patronising by gamblers. The focus on enabling the gamblers to make their own choices on their own terms is consistently emphasised in official materials produced to promote YourPlay (Figure 9.5 and 9.6). It would have been useful for this philosophy or approach to be more strongly emphasised in training for venue staff as well because of its potential role in improving people’s receptivity to the service.

Recommendation 16: Review training to ensure consistency of messaging (e.g. emphasis on gamblers’ own choices) and to ensure it provides gaming room workers with techniques to support their interactions with gamblers around YourPlay and responsible gambling more generally.

This training around interactions with gamblers around YourPlay needs to reflect and be integrated with the broader training around interaction with gamblers as part of responsible service of gambling, and as such is beyond the scope of this study. However the good practices that such training should support include (Gainsbury et al. 2018, Taylor, Delfabbro and Armstrong 2014, Delfabbro, 2011; Delfabbro et al., 2007, 2016):

- initial approaches should be conversation and focussed on establishing rapport with the gambler;
- introduction of YourPlay should not be framed around observations of a gamblers behaviour, unless warranted in the context of a broader responsible service of gambling intervention (in which case that should be the focus not YourPlay per se);
- maintaining an emphasis on gamblers managing their own gambling;
- include suggested ‘scripts’ or techniques for structuring the interaction;
- ensuring that the interaction is not perceived by the gambler as condescending or paternalistic;
- is focussed on positive benefits of using the scheme, but is not a ‘sales pitch’;
- communications demonstrate an understanding of YourPlay; and
- be informed enough about YourPlay to assuage potential concerns by gamblers around issues such as monitoring by government and protection of confidentiality.

Figure 9.5 Screen-shot messaging from YourPlay website

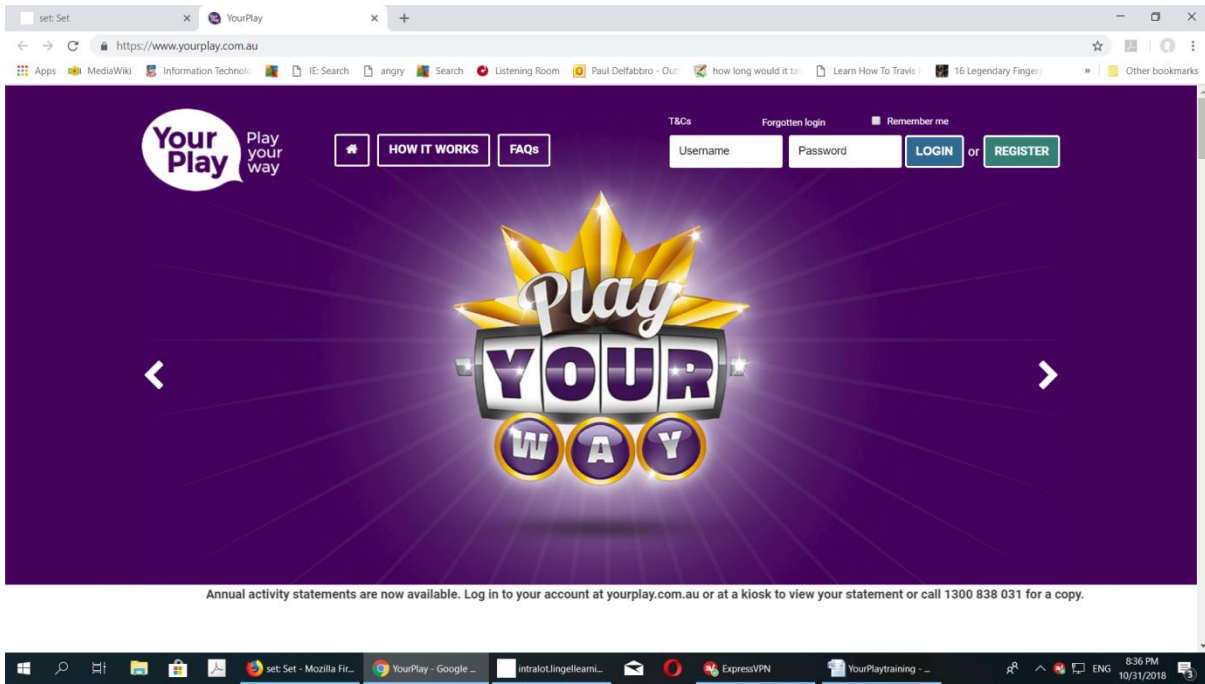
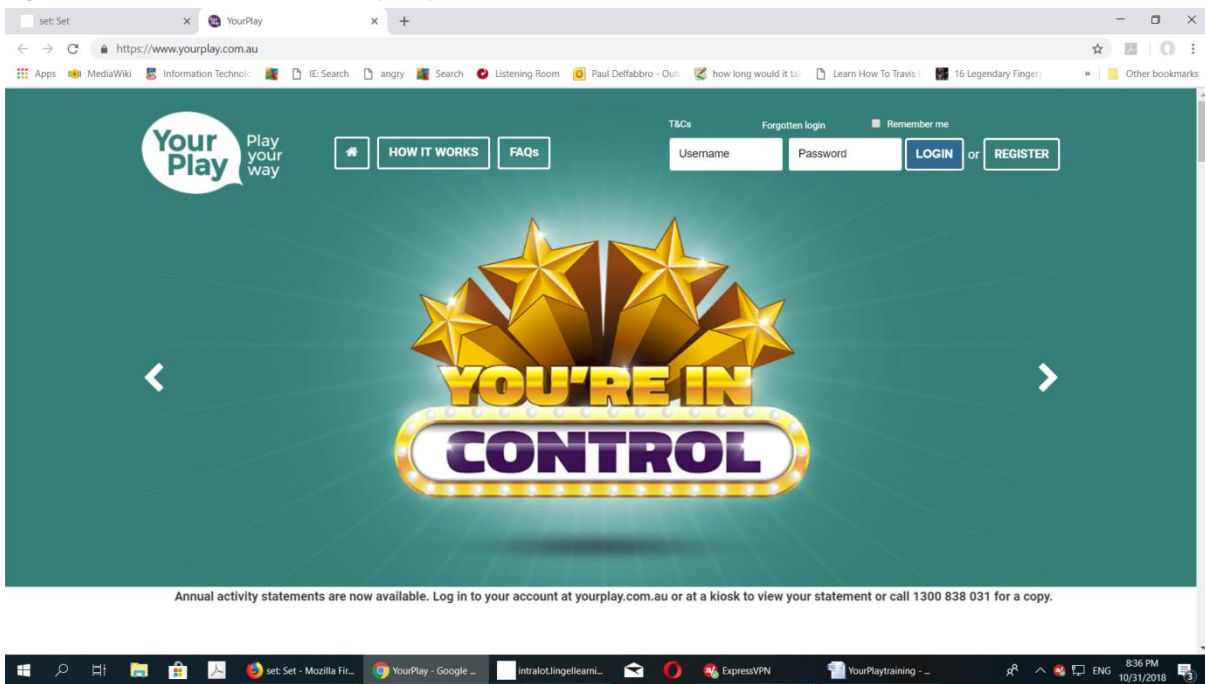


Figure 9.6 Screen-shot from MyPlay website



10. Venue Views on Factors Driving YourPlay Use

A final wave of qualitative research was undertaken with venue managers and gaming room staff in early 2018 to capture their views and experiences now that YourPlay has been operating for some time. In particular the discussions focussed on the current practices and views of venue managers and gaming room staff around YourPlay, the factors that were identified as the main barriers to YourPlay use by gamblers, and thoughts on the way forward.

In reporting on attitudes and practices of venue managers and gaming room staff we have on occasions split the discussion between those venues which we describe as 'higher use' and those we describe as 'low use' based on the intensity of YourPlay use in the venues relative to the overall distribution in Victoria. However judged against the level of YourPlay use that is likely to be required for the scheme to achieve its objectives (somewhere between 1 and 5 per cent of turnover) none of the 498 hotels and clubs with gaming turnover reported in 2017/18 could really be thought of as high use, and only one venue as having acceptable use. For the purposes of this discussion the 65 venues with the highest average share of their gaming turnover undertaken by users of YourPlay cards are allocated to 'higher use' and the remaining venues to 'low use'. However, due to the low overall use of YourPlay cards in hotels and clubs, this 'higher use' category included venues with use of YourPlay as low as 0.16 per cent of gaming turnover.

10.1 Overall view of YourPlay

Support for concept of YourPlay

Venue managers generally appear supportive of YourPlay (not least as a defensive mechanism against other, potentially more intrusive, harm minimisation measures such as mandatory use of YourPlay or \$1 maximum bet limits). Gaming room staff were also generally supportive, however there was more variation in their responses from strongly supportive to seeing it as a waste of time and money (in the latter case this was largely driven by concerns about low take up of YourPlay).

In theory, YourPlay was seen by most venue managers and gaming room staff as a useful tool for people who want to help themselves. Accessing information on gambling behaviour was viewed as an important tool to assist all players, and this feature was mentioned more frequently than the ability to set limits. Managers and staff see YourPlay as a feedback tool to reinforce self-control. It is an aid, an incentive to ensure that gambling play remains enjoyable.

Most managers and staff expressed strong support for activities that reduced the risks to gamblers in their venue, both from the point of view of looking after their customers but also to maintain community support for EGMs in hotels and clubs. To the extent that this didn't always translate into strong actions on responsible service of gambling, including promotion of YourPlay, it was usually due to a combination of misconceptions about the prevalence of problem gambling amongst regular EGM gamblers (many venue managers and gaming room staff appeared to believe that the overall population prevalence for problem gamblers in the Victorian community – 0.8 per cent – was reflective of the prevalence of problem amongst regular gamblers in their venue, and so incorrectly perceived them as very rare amongst regular EGM gamblers) and doubts about the effectiveness of interventions, particularly YourPlay.

Venue managers and gaming room staff generally have a shared view of the objectives of YourPlay, seeing it as a useful tool in assisting players assume control of their gambling. Managers and staff generally didn't see the benefits of using YourPlay as universal, but rather saw it as a tool for the higher spend gamblers, perhaps 5 to 10 per cent of their gamblers.

However there were some potentially significant differences in emphasis, with managers, and those workers in venues with higher usage, generally perceiving the benefits of the scheme as arising from the 'consumer protection'/expenditure monitoring features benefitting higher spend gamblers broadly regardless of whether they had problems, with a secondary benefit of reducing the risk of gambling escalating to problem gambling.

In contrast, gaming room staff in venues with **low usage rates** were more likely to perceive YourPlay as primarily a harm minimisation tool for problem gamblers.

There were significant variations between venues on who took responsibility for YourPlay, both in terms of promotion to gamblers and in terms of the technical aspect of signing people up. In some venues these responsibilities were broadly shared among gaming room staff, in other cases there were a small group of individuals responsible for YourPlay and any queries or actions would be passed on to them (the was usually the YourPlay ambassador and/or the responsible service of gambling officer).

Interestingly there didn't seem to be a clear pattern of relative success in achieving higher YourPlay usage amongst gamblers between venues which spread responsibilities widely and those which focussed on a few key responsible individuals, with higher use venues represented amongst both approaches as were low use venues.

Significant doubts about effectiveness given low use

There was universal concern amongst both venue managers and gaming room staff at the low usage of YourPlay, with the tone of the comments varying from enquiries on what could be done to get more people to use it, to the view that with usage so low it was a pointless scheme.

"It has been implemented successfully, but it hasn't been a success." Venue manager, higher use club

"It's a great tool if people want to use it, unfortunately it's really hard to get people to want to use it." Venue manager, higher use club

"It's a good idea but in reality it doesn't work." Staff member, low use club

"I can sort of see the point behind YourPlay because gambling is such a big problem in society these days, but none of the players at the venue use it." Staff member, low use club

Due to the lack of interest and overall use, YourPlay was viewed by many of the venue managers and gaming room staff as being a waste of money and time. This belief was evident across higher use and low use venues, but more prevalent among the latter.

"It's a waste of time, as I just don't really think the customers are interested." Staff member, higher use club

(On their overall view of YourPlay) "Waste of time." Staff member, low use hotel

"The government should spend their money somewhere better... like on counselling problem gamblers." Venue manager, higher use hotel

"Due to the lack of response, we have no use for it." Staff member, low use hotel

"I just don't think it's worked, I just don't think it's worth it." Staff member, higher use club

10.2 Understanding of, and communication about, YourPlay

A majority of managers interviewed said that they believed venue staff are knowledgeable of the technical aspects of the scheme, or at least would be able to sign someone up using the "cheat sheets" that are available in the venue to act as a prompt. However, despite the confidence expressed by *managers* about the skill and knowledge levels of their staff there were a number of venues where staff members were not fully aware of the requirements of YourPlay, such as offering it to all individuals joining a loyalty scheme.

Due to the lack of sign-ups staff need to frequently refresh on how to sign people up. The majority of venue managers and gaming room staff stated they would still be able to sign up a patron if required, they may just need to refer to material they have on hand. The small portion of staff who stated they would be unable to sign up a patron if asked, were from low use venues.

In terms of communications from the Department, the general view was that there has been quite a bit of information about the technical details but not much information on how to 'sell it'. As a result a key theme which emerged from the research was that despite an abundance of information available on YourPlay, staff and venues were really struggling to get customers interested and engaged with YourPlay.

"We've tried our best [to sell it to people] but we're not getting anything." Venue manager, higher use hotel

"We have about 5 per week come and ask us about it, but when we explain it they're not interested." Venue manager, higher use hotel

"Looked upon [by staff] as a facility we offer but a bit of a lame duck. Hard for us to actively sell it. I'd be surprised even if people we do sign up, are using it often or as intended." Staff member, low use club

There were two broad sets of venue managers and gaming room staff who generally felt better supported in terms of the skills needed to recruit gamblers to join YourPlay; those who had attended the specialist training on the issue organised by the Department as part of the YourPlay Ambassador program, and employees at a

small number of venues where management had worked with their local VCGLR gaming support worker to deliver training specifically focussed on how and when to approach gamblers.

A number of regional venues commented on the difficulty of accessing training and support for their staff around YourPlay due to the extent to which it is delivered in Melbourne, which is seen as increasingly time consuming (and therefore expensive in terms of staff time) to access.

Several venues mentioned that it would be very useful in promoting YourPlay if they could have access to information on the actual benefits of the scheme, i.e. case studies of people it has helped as well as information on what impact has the Department seen as a result of YourPlay.

Staff responsible for responsible service of gambling activities are sometimes involved in sharing venue based experiences and also active in promoting YourPlay to staff, discussing how and when best to start-up conversations about YourPlay, how to use it, what are its features. The Ambassador day/s are valued for the information exchange and discussions of how to approach patrons, best approach to discuss value of a card, and advice to stress that information is not made available to government.

Feedback and review from the Ambassador Forums occurs in all of the venues included in the consultations, sharing ideas on what works well. In some venues staff are supported by those who do the training for Responsible Service of Gambling. Staff are exposed and knowledgeable about YourPlay and our assessment is that Venue Managers are equally well versed and committed to publicising YourPlay.

10.3 Promotion of YourPlay

All venues have substantial promotional material on YourPlay displayed, including extensive wall signage inside and outside the gaming area, signs on machines, pop up displays, pamphlets, electronic kiosks, cashier booths with information, and promotion billboards. Most also reported participating in Ambassador Forum meetings.

Some venue managers and gaming room staff expressed concern that the promotional materials for YourPlay could get 'lost in the noise' of the venue, with nothing seen as distinguishing them from the promotion of gambling products, that the posters don't actually provide any information about what YourPlay is or who it is aimed at, and that the current design of the posters has been used since the launch of YourPlay.

"It's really part of the furniture now, players don't notice it as much." Staff member, low use club

Concerns were also frequently expressed that in venue promotion was the *only* way in which YourPlay was promoted with both venue managers and gaming room staff reporting that they had not seen any mass media or social media promotion of the scheme. Many of those interviewed felt that the onus has been solely on the venues to make YourPlay work and advertise it, with some expressing concerns that if it doesn't work the blame will then fall on them.

"I just hope the Department doesn't turn around now and blame the venues for not making it work." Venue manager, low use hotel

Patrons learn about YourPlay from staff, from advertising inside the venue including on all machines, from pamphlets, from YourPlay Day, and from staff discussing YourPlay when patrons take out a loyalty card. They can inquire about the system from terminals that describe the system "What is YourPlay" ('a card based personal gaming tracker that outlines all features of the system'), review answers to FAQ, interrogate "about us", and receive information on "contact us".

Many of the venue managers and gaming room staff expressed the view that when a gambler was joining a loyalty program (for those venues which have a loyalty program) and YourPlay Days are the only times when it is feasible to promote YourPlay.

The connection between taking out a loyalty card and the opportunity to discuss YourPlay is considered to be most important by both managers and staff. However, they report that 90 to 95 per cent of gamblers do not take up YourPlay when it is offered.

The general consensus is that players have enough information, and that venue employees cannot push more at people as they simply become resistant. In casual conversation the feedback from gamblers is that "it is not for me, I don't want to know." The very irregular gamblers are not interested. The "once a week, Friday night, put in \$50 dollar gamblers" are not interested. In regional communities there is also the factor that staff

generally know individual gamblers, but even this familiarity has limits, in that you can advise people about YourPlay but it makes little, if any, difference to the take up.

Generally, venue managers and gaming room staff felt their regulars were aware of YourPlay, but casual visitors were not. Patrons who are aware of YourPlay generally find out about it through events like YourPlay Days, or from asking staff members about the card slots and posters which were installed in the machines when it first came out. General enquiries about YourPlay have dropped off since it was first launched.

“9/10 people know what it’s all about now.” Staff member, low use club

Managers and staff felt that regular patrons who are unaware of YourPlay, are unaware because “they don’t want to know about it.”

“When you try to explain, you get brushed off.” Staff member, low use club

There were very mixed experiences reported about using other forms of in-venue advertising such as announcements over the PA system, pre-recorded ‘radio’ advertisements and advertising on in-venue display screens and TVs. Some venues reported that using advertising of this type had been effective, whereas others expressed the view that there is a degree of information saturation so this ‘more intrusive’ in-venue promotion would be unproductive, likely to perhaps even cause resentment.

The perceived role of staff in promoting YourPlay varied. Higher use venues were more likely to report they would actively approach customers about YourPlay.

“If there is someone I think has been gambling more than usual I would go up to them and offer it to them like: ‘Oh hi, have you considered YourPlay?’” Staff member, higher use club

Low use venues, however, often had staff who were reluctant to pro-actively engage with gamblers, or who felt that it was not the role of gaming room staff to engage with gamblers about their spending and the use of YourPlay without being approached by the gambler.

“We’re all encouraged [to promote YourPlay] but we’re not allowed to go up to them and ask them, it’s only if they ask us.” Staff member, low use club

One venue manager at a low-use venue wasn’t even aware that YourPlay needed to be offered upon every loyalty membership request, and that lack of understanding was not uncommon amongst staff members in low use venues who often seemed to see an offer of YourPlay as part of the loyalty sign-up process as something they should try and do rather than a requirement.

“There may be some legal requirement that I missed.” Venue manager, low use venue

Higher-use venues were more likely to report they were taking additional steps to promote YourPlay and to proactively encourage customers to sign up, particularly through the use of incentives such as small gift items such as pens or cupcakes, or by offering a raffle for those who sign up on the day. This is compared to lower-use venues who were more likely to see their role as being available to answer questions and sign people up if needed, rather than being in a position to ‘sell it’ to customers.

“Every time we have YourPlay Days, we offer incentives and offer \$100 draws.” Venue manager, higher use club

“Every now and then we’d offer a chance to go into a draw for a bar tab voucher for everyone who signs up to YourPlay.” Venue manager, higher use hotel

There was a generally widespread view amongst managers and staff of small venues that larger venues (with a higher number of EGMs), had a greater responsibility to be pro-active in promoting YourPlay, especially given their additional access to resources.

“In (large casinos) they have all of these resources and dedicate people to just going around talking to people about YourPlay, but it’s completely different in a small venue like this.” Staff member, low use hotel

The YourPlay Days are considered to be important, particularly because the activity (purple T-Shirts, balloons, other advertising) provides a platform or opportunity to focus on providing information to gamblers about YourPlay. Gamblers notice the effort on the day and are more inclined to ask questions. Those venues without loyalty cards indicated this activity does help to sign up a few gamblers on the day when in other circumstances

they have been reluctant to consider signing up. One of the “higher use” venues considered that they had more sign ups on YourPlay Days than at any other time, so this was a valuable exercise.

One venue has a table display of YourPlay information including cards. During the YourPlay Days they place a card on each machine which has been successful in getting people to open up conversation, to trial a card as a casual player, to ask about YourPlay and this probably accounts for the venue being classified as a “higher use” venue.

Several venues said they put on extra staff for the day, provide snacks and give-aways, and endeavour to encourage conversations between staff and patrons and survey people during the day.

10.4 Impact on staff

Only a minority of those interviewed reported significant difficulties with the ‘technical’ aspects of YourPlay such as signing up players in the system, assisting them to set limits at the kiosk etc., in most cases it was felt this was well understood after the training provided. For those who felt less confident they generally reported aides were made available with many venues having their own ‘cheat sheets’ setting out the steps to registration.

In a minority of venues, a broader benefit of YourPlay was seen as its role in increasing interaction between staff and gamblers, and the broader skills around interacting in a sensitive manner and having ‘difficult conversations’ staff have acquired in the context of YourPlay.

The impact of YourPlay on staff and venues has generally been negligible due to the lack of sign ups and use. Overall managers and staff felt that they would be impacted by YourPlay if there was a greater take-up by customers, due to additional work in signing people up and answering questions; however this was not a current concern due to low usage levels.

“Just another thing to know and tick off.” Staff member, higher use club

“I think a lot of my co-workers are in the same boat as me, they just think ‘Your Play? What a waste of time.’” Staff member, low use club

“It’s a regulation that we have to have.” Staff member, low use club

There were complaints from staff members that the process to sign a player up to YourPlay takes too long and is overly complicated.

One manager of a higher-use venue discussed the importance of attitudes and action related to YourPlay being from the top-down. Specifically, making sure they (as a manager) are behind YourPlay 100% and always speaking positively about the scheme to staff and customers, no matter their personal opinion. This contrasted with many other venues where staff perceived managers as being sceptical of the scheme.

“The attitude and pro-active approach to YourPlay needs to come from the top down... as far as my staff and customers are concerned I think YourPlay is great, the best thing ever.” Venue manager, higher use club

“The managers would also say no one really uses it.” Staff member, low use club

Staff at several of the higher use of YourPlay venues reported a significant benefit of YourPlay from the staff point of view was that having a pre-commitment system available to them was a useful addition to their responsible service of gambling options, as it was seen as a less ‘confronting’ option to help those at risk than referral to gamblers help counselling or self-exclusion and was less likely to provoke an adverse reaction, or an outright rejection of the intervention, than those other more directly problem gambling focussed, forms of support. But the broad difficulty of how to identify those gamblers whose behaviour is becoming more risky, and then how to sensitively manage a conversation around reducing that risk, was still regarded as a problem for staff.

Venue staff report they generally know through observation and frequency of attendance who their regular customers are, and who are most likely to experience problems with their gambling behaviour. On balance, the response by staff is to encourage those they think would benefit from the scheme but gambler reluctance is high.

Several staff indicated they have the confidence to intervene and ways of doing so, being discrete and seeking to provide information to mostly regular gamblers. Other staff felt they did not have the confidence or skills to intervene and they referred concerns to managers. At times staff did relay concerns about individuals to

managers, they did draw attention and discuss what they had been observing and managers did intervene. Discrete conversations were held, player observations were undertaken, and patrons were offered YourPlay or other actions (self-exclusion in several cases). All managers reported that they encouraged and supported staff training in this area, and for the majority of venues this view was backed up by the staff themselves. However, there was a substantial minority of staff in low use venues who reported feeling that it “really wasn’t their business” to promote YourPlay as gamblers might see it as a negative reflection on their gambling, and that any intervention should be limited to where there are obvious signs of distress.

One venue has used YourPlay Days to put casual cards on every machine and also casual cards in information brochures on a table in the venue. Players pick up the card on the machine and this starts the conversation from the player’s initiative, not the staff.

10.5 Impact on gamblers

Due to non-existent or low uptake of YourPlay, venue managers and gaming room staff perceive no significant impacts from YourPlay on gamblers in their venue.

The assessment of all those interviewed is that the impact has been very minimal in both the hotels and club environment, certainly no impact on revenue. Use is low to non-existent driven by a combination of gamblers seeing YourPlay as ‘not for them’ (e.g. that it is a product for problem gamblers, or those who can’t control their gambling, and gamblers are reluctant to self-identify as such), and a view from gamblers that there is no value for them in using the card (e.g. no prizes or other incentives).

Several venue managers, largely those of a venue which did not use a loyalty system, expressed the view that use of a card has not been normalised in Victoria, and thought that other gamblers in the venue may see use of a card as a sign that the card user has problems with their gambling.

Beyond the specific denial of a need for the card by gamblers, both venue managers and gaming room staff also mentioned an often widespread reluctance to have any information about players’ gambling spend provided to them. This reluctance extended to expenditure reports provided as part of loyalty programs.

“You often see them sort of holding their hands up as a barrier when you print off their loyalty report for them ‘no, no, I don’t want to see it.’” Venue manager, higher use club

“Players hate getting their print out of expenditure from the loyalty scheme, I’ve seen them tear it up and throw it away sight unseen.” Staff member, higher use club

This has potential negative implications for both the ability of loyalty to act as a channel into YourPlay use, and for the latent voluntary demand for YourPlay itself given the key role of expenditure reporting in the scheme.

Some venue staff have noticed a tendency for players to be deterred by the requirement of having a PIN in order to use the YourPlay functionalities. This appears to have been a particular problem with older gamblers.

It is particularly hard to get older players and players from culturally and linguistically diverse backgrounds (CALD) to use YourPlay. It was suggested older players often don’t understand the concept and there is no in-language information available to explain YourPlay to players from a CALD background. A low-use venue within a highly culturally diverse location felt it was particularly hard for them to get their clientele interested in YourPlay.

“Well we don’t have any in-language material to offer them.” Staff member, low use hotel

“We have a largely European clientele at this venue, and it’s just not something they believe in.” Venue manager, low use club

Most players reportedly don’t see any benefits from using YourPlay and they question why they would use it. Both venue managers and staff reported a catch-22 where gamblers who feel like they have their gambling completely under control perceive that have no use for it (as their gambling is controlled), whilst gamblers who do have a problem (that they recognise) are very resistant to anything that highlights their level of spending.

Broadly YourPlay was seen as having more negative connotations among players: inconveniences such as the need for a PIN, making you feel like a loser, and government monitoring your spending (including concerns they may lose their pensions).

“There’s no incentive, it’s not like your rewards where you’re getting points.” Staff member, low use club

“The first thing anyone asks is ‘what do I get out of it?’” Staff member, higher use club

“It doesn’t work for two reasons. One people think it’s a hidden agenda and two, it’s a lengthy process and ties up our resources.” Venue manager, low use club

Some gamblers who have signed up for YourPlay have asked for it to be removed. The reasons behind this varied. One reason was the issue of having to include a PIN (mentioned above), and the other commonly mentioned reason was that gamblers did not understand what it was when they initially signed up, and did not want to see their losses and/or have their spending monitored.

Very few venue managers or gaming room staff had experienced gamblers approaching them to ask questions about YourPlay or how to use it, except during YourPlay Days when the signage, t-shirts and other materials do often spark interest and lead to spontaneous questions about what YourPlay is and how it works.

Managers and gaming room staff all reported that they felt that general awareness of YourPlay is reasonable due to the in-venue advertising and special events, particularly amongst more regular gamblers. But there remains a reluctance to take out a card or use the features of YourPlay. There is also a slight disconnect in the responses given to the question of awareness as many of those who reported high levels of awareness also commented on the effectiveness of YourPlay Days in getting gamblers to ask questions around what YourPlay is and how it works.

The general assessment of managers and staff is that YourPlay has not had any impact on player enjoyment or player behaviour, but that this was largely driven by the very low level of use.

All attribute value/benefit of a card based system but consider those who might benefit the most are the ones who choose not to use YourPlay and there are only isolated instances where a gambler themselves, observing they might have a problem, approach staff to discuss YourPlay features. The few instances where this has occurred the patron signed up to YourPlay.

10.6 Measures of success

There were mixed attitudes to what a “successful” YourPlay might look like. Most venue managers and gaming room staff thought that if the right people were to use it then there would be an improvement in community wellbeing with reduced harms from gambling.

However, a clear majority, particularly of the gaming room staff, thought that a successful YourPlay scheme would also have a significant negative financial impact on venues with revenue declines flowing through to the workforce, with fewer hours available and staff laid off.

10.7 Barriers to use

Four broad factors were consistently identified by managers and staff as barriers to getting players to join YourPlay, and sustain their use of it once joined up, these were (in descending order of the frequency with which it was raised):

- concerns about privacy, particularly related to expenditures being monitored by the government;
- a sense amongst gamblers that the scheme does not provide them with any benefits;
- the difficulty of remembering PINs, and frustrations at entering them at the start of each session, has proved a barrier to use being sustained in many venues; and
- the use of cards not yet being normalised, and there being a sense of stigma regarding the use of a card.

Venue managers and gaming room staff consistently reported that privacy is a concern as people “don’t want the government to know anything about them”. A number of venue managers and gaming room staff reported that gamblers in their venue had interpreted “track your play” when YourPlay was being described as referring to the **government** tracking the play of YourPlay users. Concerns were also expressed about the implications of such monitoring for government benefits or for tax compliance, with recent media attention around benefit crackdowns by Centrelink such as ‘robodebt’ mentioned a number of times. This was reported to have sparked significant resistance to the scheme by gamblers. Some venues reported finding use of alternative phrasing such as “monitor your own spend” allayed these concerns amongst some gamblers, however it remained a significant, negative, perception of the scheme. Interestingly, none of the managers or staff reported having actively promoted the use of casual cards in cases where privacy concerns were raised.

Recommendation 17: Review and market test messaging to try and assuage concerns about government monitoring

Second, gamblers seemed to be unconvinced of the benefits of YourPlay, with staff reporting that invitations to join YourPlay were generally rejected along the lines of “what would I get out of it?” or “that’s not for me”. Gamblers seem to associate YourPlay with a need to address gambling problems, rather than to be more informed about their gambling. And indeed, there also appears to be substantial resistance amongst regular gamblers to receiving any information about the expenditure.

Recommendation 18: Explore whether it is possible to structure some of the promotional materials for YourPlay around actual benefits perceived by typical gamblers, for example through testimonials or case studies.

Third, a number of venues raised PINs as a barrier; not to initial sign up but to maintaining use of YourPlay by gamblers in their venues. Older gamblers were reported to be particularly likely to have difficulties remembering their PIN, and to find the process of entering it each time they gambled difficult. PINs were also reported as a source of frustration amongst those gamblers who preferred to switch machines during their time in the venue due to the need to re-enter the PIN each time.

Recommendation 19: Consider removing the requirement to enter the PIN when using the YourPlay card on a gaming machine as expenditure during a session or day presents a low risk of privacy breach, with PINs retained for accessing full history and contact details which are potentially more sensitive.

Slightly less frequently, but still quite widespread amongst venues, it was felt that there remained a degree of stigma associated with the use of a card, with patrons linking it to gambling problems.

Interestingly this reluctance appears to extend to loyalty card use with a number of venues reporting that they had been disappointed by the low take up of loyalty in their venue, to the extent that several venue managers reported that they were reviewing whether to continue with loyalty (this concern appears to be independent of the specific loyalty scheme).

In most cases where this residual ‘stigma’ of card use was raised it was contrasted with the experience in NSW and Queensland, where managers and staff believed card use had been normalised through the widespread take-up of loyalty schemes by EGM gamblers in those states (particularly in clubs), which some venue managers reported as being typically 70 to 80 per cent of gamblers in a venue compared to Victorian loyalty use which was more typically in the 20s.

In those venues where venue loyalty programs were in use, it was generally reported that, whilst loyalty offered a good opportunity to talk to gamblers about YourPlay, it is difficult to get them to join YourPlay. Gamblers ask if there are loyalty benefits from YourPlay and when told there are not they don’t see any incentive to sign up. In general the ways in which venue managers and gaming room staff self-report introducing YourPlay to those joining loyalty programs appear reasonable and compliant with the requirements of the scheme, there were a minority whose self-described behaviours were not compliant. This typically either involved relying on a written mention of the Scheme in the information provided about the loyalty program (e.g. a check box on a sign-up sheet) or not always offering YourPlay at all on sign-up.

A majority of venue managers and gaming room staff expressed the view that YourPlay’s own attributes aren’t sufficient to get players to sign up and that players want to get something out of signing up for the scheme, some incentive to use it (or at least to join it).

All venue managers and gaming room staff reported they are rarely (or, in many cases, never) asked about the scheme outside of YourPlay Days and after providing information, and encouraging some gamblers to at least try the card most gamblers decline, saying it is “too hard”.

Those venues not linked to loyalty schemes largely rely on the placement of the required marketing materials around the venue as their mechanism for promoting YourPlay, although all reported at least some additional activity on YourPlay Days. A minority of venues without loyalty schemes were more pro-active, either promoting YourPlay to gamblers when they are in the cashier area or incorporating it into their responsible service of gambling activities.

11. Impact of YourPlay Days

In October 2016 the Department trialled a new, venue focussed, approach to promoting YourPlay, called YourPlay Day. This is an event held in venues where staff promote YourPlay broadly across patrons in the venue to ensure that anyone approached does not feel singled out or stigmatised. On YourPlay Day venues were encouraged to have staff wear themed purple t-shirts, to display promotional material about YourPlay throughout the venue with themed balloons used to attract gamblers' attention, install small displays in prominent parts of the venue, and proactively engage with all patrons around YourPlay throughout the day.

Some venues took this further and attempted a wider range of engagement activities such as handing out cupcakes, offering free soft drinks and snacks, providing small gifts to those who signed up on the day such as branded pens, rostering on more staff for the day, and in a few cases running a prize draw for those who signed up on the day.

YourPlay Days have since been repeated in April and October 2017 and in July 2018.

During consultations with venue workers and managers the response to YourPlay Days was almost universally positive. In particular it appears to have provided an avenue for staff to overcome any reluctance they feel about promoting YourPlay directly to gamblers, with staff reporting that it prompted customers to ask questions about YourPlay, with patrons themselves starting the conversation in a causal way; and more importantly, no one in particular felt targeted. Therefore, venue staff, venue managers and venue support workers strongly supported the maintenance of YourPlay Days as a regular responsible gambling activity.

Indeed, many of the venue managers and gaming room staff interviewed expressed the view that when a gambler was joining a loyalty program (for those venues which have a loyalty program) and YourPlay Days are the only times when it is feasible to promote YourPlay to gamblers.

In order to test whether YourPlay days are as effective in driving sign up (and whether they lead to sustained use of YourPlay) the number of registrations of YourPlay cards on YourPlay Days has been compared to the number of sign-ups on the same day of the week three weeks before YourPlay Day and three weeks after YourPlay Day. The days in question are:

- Thursday 20 October 2016 (comparators Thursday 29 September and Thursday 10 November);
- Thursday 27 April 2017 (comparators Thursday 6 April and Thursday 18 May);
- Thursday 26 October 2017 (comparators Thursday 5 October and Thursday 16 November); and
- Tuesday 31 July 2018 (comparators Tuesday 10 July and Tuesday 21 August).

Unfortunately, casual cards do not appear to record a registration date and so it is not possible to undertake the analysis based on the date the card was registered. Instead we have used data on the date on which the card was first logged in to the system as a proxy for when it was registered/taken up by the gambler. This will not be a perfect guide to registrations on specific days as in some cases a card will be registered/collected on one day and not used until another day, however we would not expect systematic differences between YourPlay days and other days.

As can be seen in Table 11.1, the number of sign-ups on YourPlay Days which are subsequently used in at least one session with gambling expenditure greater than zero, is significantly higher than on the comparator days and this difference is highly statistically significant. Across the four YourPlay Days the average number of cards registered which had at least one session of gambling with non-zero expenditure was 424.3. Across the eight comparison days the average number of cards registered was 16.5.

The average number of gambling sessions with non-zero expenditure undertaken with the cards registered on a YourPlay Day, and the average expenditure per session are broadly similar to those of cards first logged in on one of the comparator days.

At its face value this would suggest that YourPlay Days are very effective in increasing registrations, albeit from the very low levels seen on typical days. However, if this relative success has come at the expense of venues seeing YourPlay Days as the *only* means of achieving then at least some of this relative success may have come at the expense of registrations on other days.

Recommendation 20: Continue to run YourPlay Days as an important tool for recruiting YourPlay cardholders and building awareness of the scheme.

Table 11.1 Registrations achieved on YourPlay Days and Comparators

Timing	Metric	Comparator days (average)	YourPlay Day
Oct-16	Total registrations with at least one session with spending (no.)	21.0	344.0
	Total sessions for cards registered on day (no.)	3,293.5	7,824.0
	Total turnover for cards registered on day (\$)	2,975,327.1	62,870,000.0
Apr-17	Total registrations with at least one session with spending (no.)	16.5	744.0
	Total sessions for cards registered on day (no.)	4,305.0	10,441.0
	Total turnover for cards registered on day (\$)	5,845,000.0	3,481,787.7
Oct-17	Total registrations with at least one session with spending (no.)	12.5	316.0
	Total sessions for cards registered on day (no.)	2,539.5	13,095.0
	Total turnover for cards registered on day (\$)	2,927,126.3	2,933,018.8
Jul-18	Total registrations with at least one session with spending (no.)	16.0	293.0
	Total sessions for cards registered on day (no.)	4,284.0	5,836.0
	Total turnover for cards registered on day (\$)	3,772,956.3	2,912,398.1
Average	Total registrations with at least one session with spending (no.)	66.0	1,697.0
	Total sessions for cards registered on day (no.)	14,422.0	37,196.0
	Total turnover for cards registered on day (\$)	15,520,409.6	72,197,204.7

It is notable that there is substantial 'wastage' in YourPlay sign-ups, and that this is slightly worse on YourPlay Days. As well as the 1,697 sign-ups on YourPlay Days shown in Table 11.1 where the card holder went on to undertake at least one session with gambling expenditure, there were an additional 930 sign-ups which were never used in a gambling session with expenditure (35.4 per cent of total sign-ups on YourPlay Days). On the comparator days, as well as the 132 sign-ups with subsequent expenditure recorded in the table above, there were 36 sign-ups with no subsequent expenditure (21.4 per cent of the total).

Some of this wastage is likely to be gamblers who took a card during a YourPlay Day either to access incentives offered by the venue, or not really knowing what it was, without any specific intention to use it and their one access of the system did not give them enough incentive to change that lack of intention. It also appears that cards are on occasion being accessed by venues for testing purposes. For example amongst the cards first logged in to the system on 27 April 2017 there is a card that has been used for 224 sessions on gaming machines, none of which involved any expenditure.

However, given that wastage rates are still very substantial on the comparison days this data suggests that there is a potentially significant missed opportunity here. It seems unlikely that gamblers would have accessed a YourPlay Card on the comparator day without any intention of using it, and instead this suggests that some combination of technology failures in the venue, lack of support by venue workers (both barriers noted in the mystery shopping exercise, see Chapter 14), and/or the experience of YourPlay on a machine not meeting gambler's expectations has stopped this initial card access from converting to use of the scheme. If these barriers were not present then it is conceivable that usage may have been 20 to 25 per cent higher than it is given the observed wastage rates.

Finally, whilst the rate of sign-up on YourPlay Days is pleasing, it is also worth putting these sign-ups on YourPlay day in perspective. If YourPlay were on track to reach market penetration of 1 to 2 per cent of EGM gamblers in Victoria which is likely to be the minimum market penetration needed to have a meaningful impact on consumer protection then it is likely that the scheme would need to see weekly signup rates roughly in line with that achieved on YourPlay days.

12. Factors Correlated with YourPlay Use in Hotels and Clubs

As shown in Chapter 8 there is significant variation in the rates of YourPlay use between individual hotels and clubs. In stakeholder consultations undertaken as part of this project, it was not uncommon for venues with low rates of YourPlay usage to ascribe the low use of YourPlay in their venue to the demographics of their region and venue. This chapter seeks to explore the regional dimension of these claims to identify what, if anything, is correlated with the intensity of use of YourPlay in Victorian venues at the regional level, and for the few venue specific characteristics that are known.

The Melbourne Casino is excluded from this analysis as its patrons are much more widely dispersed geographically than a typical hotel or club making an analysis based on the demographics of its physical location not meaningful.

Overall there are 529 Victorian hotels and clubs¹² included in the analysis dataset which spans the period from January 2016 to March 2018. The analysis examines the variations in YourPlay usage across Victorian clubs and hotels venues with respect to its size and location (i.e. number of EGMs, turnover size, metropolitan or regional venues).

The dataset to be analysed combines data on the use of YourPlay and their service providers from Department's Business Intelligence system and, data on EGM venues, EGM entitlements and turnover from the Victorian Commission for Gaming, Liquor and Racing (VCGLR, 2018). Data from the two sources were merged for each venue by month to result in a final dataset of 13,385 observations for 529 venues over 27 months (See Table 12.1).

Of the 529 venues, there were 224 Clubs and 285 Hotels. Venues were located across 335 Metropolitan and 194 regional areas, and across 69 LGAs and 235 postcodes. The largest venue type are metropolitan hotels, consisting of 38 per cent of all Victorian venues. A venue is more likely to be a hotel in a metropolitan area (201 hotels vs 134 clubs) and more likely to be a club in a regional area (110 clubs and 84 hotels).

Table 12.1 Summary of characteristics of dataset

Variable	Summary
No. of observations	13,385 observations identified over venue and month
Time period	Monthly from Jan 2016 to March 2018 (i.e. 27 months)
Venues	529 venues
Venue type	244 Clubs (n=6,379 'month/venue' observations) & 285 Hotels (n=7,006 'month/venue' observations)
Region type	335 Metropolitan (n=8,444 'month/venue' observations) & 194 Regional (n=4,941 'month/venue' observations) venues
Venue and Region Type	201 Metro Hotels & 134 Metro Clubs 84 Regional Hotels & 110 Regional Clubs
Postcodes	235 postcodes
Local Government Area (LGA)	69 LGAs
YourPlay Service Providers	15 YourPlay service providers for 494 venues; 35 venues that could not be matched to a service provider with 438 missing observations as a result

Source: DJCS (2018), VCGLR (2018), calculations SACES.

12.1 Patterns in EGM entitlements and turnover in analysis sample

To some extent, broader gaming activity patterns in venues may influence the use of YourPlay. Before examining YourPlay usage by venues, it is useful to consider the patterns of EGM entitlements, turnover and turnover per EGM (i.e. intensity of play per machine in each venue) in the monthly VCGLR data to shed light on gaming activity across venues.

An 'average' (i.e. mean) Victorian venue in Jan 2016 to March 2018 had 53 EGM entitlements with monthly average gaming machine turnover of \$4.8 million, and about \$84,000 of turnover per gaming machine (Table 12.2). However, these averages mask the considerable variation across venues as presented in their distributions in Figures 12.1 and 12.2. Turnover and turnover per EGM distributions are highly and positively skewed with large value ranges. This suggests that the majority of venues were reporting on the lower range

¹² We have defined club venues to be identified by its unique venue code as recorded in the VCGLR (2018) and DJCS (2018) dataset, which it turn is based on licensing data. In the dataset, a venue will be registered under different venue code if it had undergone a change in management. Consequently, our analysis will treat a same name venue that has been registered under two different codes as two distinct venues – one before the change in management and a different venue after.

of values (including zero) while a notably small number of venues were reporting on the extremely high range of values (end tails).

Figure 12.1 EGM entitlements per venue (monthly observations), January 2016 to March 2018

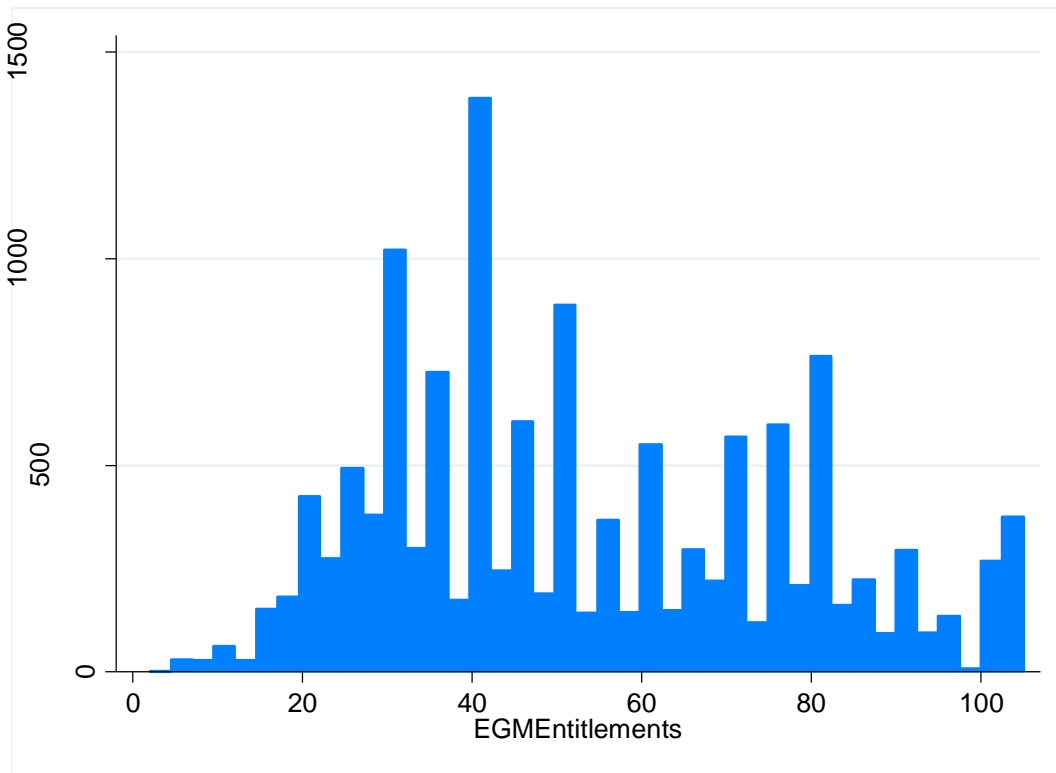
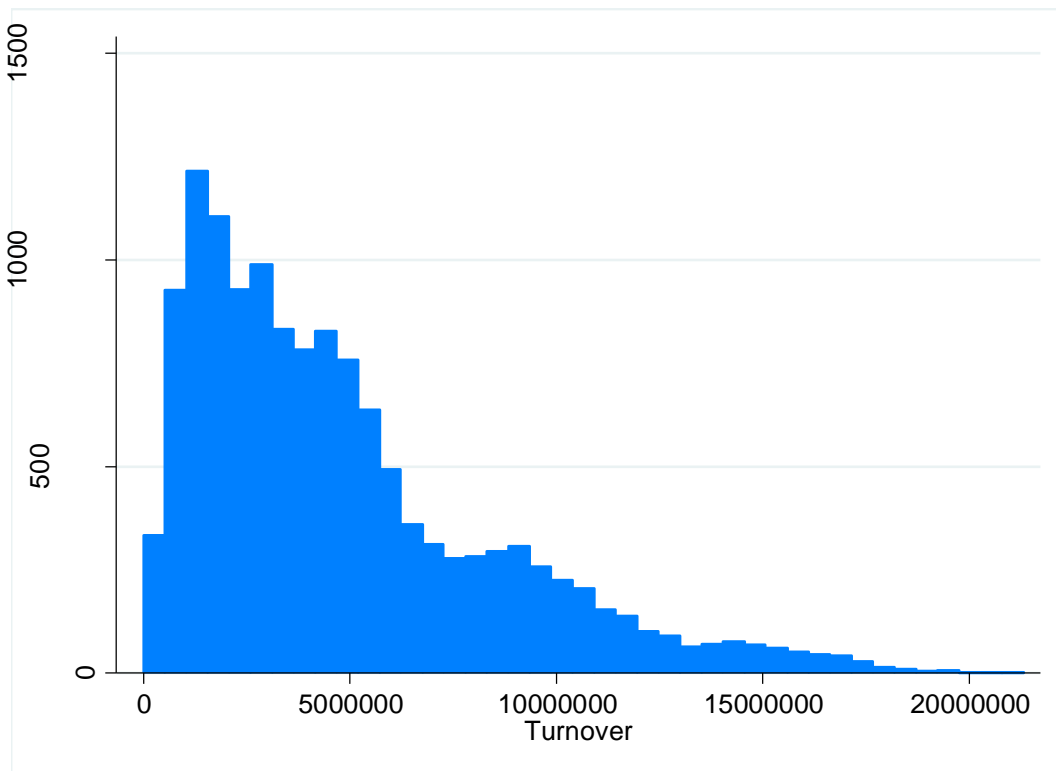


Figure 12.2 Frequency distribution of monthly turnover in dataset (monthly observations), January 2016 to March 2018



Variations in venue size appear to be more associated by regions than by venue type. Metropolitan venues are larger than those in regions, with a median of 60 EGM entitlements compared to 36 EGMs (Table 12.2). On the other hand, clubs are just marginally larger than hotels, with a median of 50 EGMs relative to 48 EGMs.

Metropolitan clubs were the largest with a median of 60 EGMs while regional hotels were the smallest with 30 EGMs.

Table 12.2 Median EGM entitlements, Turnover and Turnover per EGM by Region and Venue Type, January 2016 to March 2018

Venue and Region Type	EGM entitlements (no.)	Monthly gaming turnover (\$m)	Monthly turnover per EGM (\$)
Regional	36	2.2	61,991
Metro	60	5.0	95,923
Club	50	2.9	57,065
Hotel	48	5.0	107,101
<i>Metro & Club</i>	60	3.7	57,065
<i>Metro & Hotel</i>	54	6.6	118,059
<i>Regional & Club</i>	40	2.3	57,062
<i>Regional & Hotel</i>	30	2.1	73,867
All venues	49	3.9	76,923

Source: DJCS (2018), VCGLR (2018), calculations SACES.

However, the size of a venue's turnover is only weakly associated with venue size (i.e. number of EGMs). Despite metropolitan clubs reporting the largest median number of EGMs, metropolitan hotels reported the largest amount of monthly turnover (\$6.6 million vs. \$3.7 million). This is due to a much higher intensity of play in metropolitan hotels, almost double the median in metropolitan clubs (\$118,000 vs \$57,000). Regional hotels also have a relatively high intensity of play (median of \$74,000 turnover per EGM per month) despite being the smallest in terms of venue size (30 EGMs). It is also interesting to note that there appears to be no difference in the intensity of play between clubs, whether located regionally or in metropolitan areas (both around \$57,100 turnover per EGM)

Variations in turnover and intensity of play are even more pronounced when examined by both region and venue type. Metropolitan hotels had the largest range in variation in turnover and the highest intensity of play. Meanwhile, a majority venues in regions (whether club or hotel) are strongly concentrated on the lower ends of the turnover and intensity of play.

12.2 Patterns of YourPlay use in the dataset

As discussed in Chapter 8, usage of YourPlay has been extremely low in hotels and clubs. It should be noted that the data used for analysis here is subtly different from that used in Chapter 8, as this dataset includes one observation for each venue for each month that it had active gaming machine entitlements (rather than one observation per venue summing across the 2017/18 financial year) and as such the distributions are not directly comparable.

While 448 venues (85 per cent of all venues) reported at least one session of YourPlay usage with expenditure >\$0 over the analysis period, the frequency of YourPlay use was generally not consistent through time, with none of the venues reporting YourPlay sessions in each month of the full time period of 27 months. Of the 448 YourPlay user venues, 63 per cent (281 venues) reported fewer than 6 months out of the 27 months with at least some YourPlay spending and a quarter of them reported YourPlay usage for only one month out of the 27 months (64 venues).

Table 12.3 YourPlay Usage by Venue Type, January 2016 to March 2018

Venue (no)	At least 1 YourPlay Session	No YourPlay Sessions	All Venues
Regional	159	35	194
Metro	289	46	335
Club	206	38	244
Hotel	242	43	285
<i>Metro & Club</i>	110	24	134
<i>Metro & Hotel</i>	179	22	201
<i>Regional & Club</i>	96	14	110
<i>Regional & Hotel</i>	63	21	84
All venues	448	81	529

Source: DJCS (2018), VCGLR (2018), calculations SACES.

Due to the large number of observations in the dataset with expenditure of \$0 it can be difficult to separate out information on what happens in venues when YourPlay is actually being used. In order to allow this, Table 12.4 reports descriptive statistics only for month/venue combinations where at least some expenditure occurred.

Even in this smaller dataset where at least some YourPlay use is guaranteed, usage is still very low with venues experiencing a median of only two YourPlay sessions per month with an associated median turnover of \$204. This resulted in an average intensity of use of 0.004 per cent of total monthly gaming machine turnover.

Variation in YourPlay utilisation among venues was large. The 90th percentile of YourPlay venue/months with at least one YourPlay session recorded in excess of 25 YourPlay sessions compared to the median of 2 sessions whilst turnover using YourPlay in these higher intensity venue/month combinations were 20 times larger than the recorded median of \$204.

Table 12.4 Median YourPlay Usage and Activity by region and venue type for YourPlay users (Only positive Sessions), January 2016 to March 2018

Median	YourPlay Sessions (no.)	YourPlay Turnover in month (\$)	Ave. Turnover per session (\$)	YourPlay Intensity (YP turnover as a share of venue turnover in month) (%)
Regional	3.0	185.7	64.8	0.008
Metro	2.0	211.1	70.5	0.003
Club	3.0	259.6	74.1	0.009
Hotel	2.0	169.9	63.7	0.003
<i>Metro & Club</i>	<i>3.0</i>	<i>258.6</i>	<i>74.2</i>	<i>0.006</i>
<i>Metro & Hotel</i>	<i>2.0</i>	<i>186.4</i>	<i>69.2</i>	<i>0.003</i>
<i>Regional & Club</i>	<i>4.0</i>	<i>261.2</i>	<i>73.6</i>	<i>0.014</i>
<i>Regional & Hotel</i>	<i>2.0</i>	<i>115.2</i>	<i>47.7</i>	<i>0.004</i>
All venues	2.0	203.6	68.0	0.004

Source: DJCS (2018), VCGLR (2018), calculations SACES.

Clubs have a slightly better YourPlay utilisation rate than hotels, and regional venues outperform metropolitan venues. Not surprisingly then, regional clubs had the highest intensity of YourPlay use, recording the largest medians in YourPlay sessions (4.0 sessions) and YourPlay turnover as a share of total turnover (0.014 per cent). However, despite being a best performer, this still represents extremely low utilisation. Metropolitan hotels had the lowest rates of YourPlay utilisation.

12.3 Gaming patterns and YourPlay usage by LGAs

Are there then some regional characteristics that help to explain the observed differences in utilisation rates between venues? Any analysis of this type is necessarily tentative as whilst we have good data on the characteristics of residents of a region (at least in census years) we do not know the characteristics of individuals in a region who engage in gaming machine gaming, which may differ. To the extent that this differs consistently across the state then the regional analysis will still be meaningful, however if there are significant differences in the propensity of individuals with various demographic characteristics to engage in gaming, or to utilise YourPlay then this analysis will be less meaningful.

Data was aggregated by postcodes for the year 2017 and merged with socio-economic data by postcodes sourced from the *2016 Census of Population and Housing* (ABS, 2018) and the *2015-16 Taxation Statistics* (ATO, 2018).

The merged dataset had 509 venues distributed across 233 postcodes in 2017. 151 of the venues were located in metropolitan areas while 82 were located regionally. A 'typical' postcode has a median of one venue with 80 gaming machines¹³ associated with \$84 million in turnover in 2017, resulting in an average of \$0.9 million of turnover per gaming machine. A 'typical' postcode also recorded a median of 9.0 sessions of YourPlay in 2017 with an associated YourPlay turnover of 0.001 per cent of total turnover.

¹³ For each venue, we took the average number of EGMs for the year as the number of EGM entitlements may vary by month.

A small number of postcodes can be identified as areas of high gaming activity. In one postcode, there were a total of 12 venues compared to 1 venue in a 'typical' area. There is however, less variation in the intensity of gaming across areas (i.e. appear better distributed).

However, these regions with higher intensity of gaming machine gambling do not appear to also be regions with a higher intensity of YourPlay use.

What is likely to influence YourPlay usage?

A range of variables were included in the analysis as potentially influential in the level of YourPlay use, these are summarised in Table 12.5. Inclusion of the variables was driven by a combination of availability of reliable data, and factors that had been shown to have an influence on gaming machine participation in earlier studies.

Table 12.5 Description of variables included in analysis

Category	Potential explanatory variables
YourPlay use	Number of YourPlay sessions (i.e. take-up rate of area)
	Total YourPlay turnover in the venue (i.e. turnover in a session in which a YourPlay card was in play)
	YourPlay turnover per session in which a YourPlay card was used
	YourPlay Intensity (e.g. turnover in sessions in which a YourPlay card was in play as a share of total turnover for the venue)
Gaming Activity	EGM Entitlements (i.e. number of gaming machines the venue is authorised to have installed)
	Turnover (i.e. size of gaming activity in area)
	Turnover per EGM (i.e. intensity of gaming activity by size)
Regional Socio-Economic Variables	SEIFA index of disadvantage (by percentile)
	Population size
	Residents' characteristics as a share of total population
	Aboriginal & Torres Strait Islander Status residents
	Population share by 10 year age groups
	Working residents' industry of employment
	Language spoken at home other than English
	Highest level of education completed
	Per capita taxable income
	Share of population on pensions and allowances

Regression analysis involves identifying the impact of a number of potential explanatory variables (in this case observable regional and venue characteristics) on the variable we are trying to explain, in this case the level of monthly turnover in venues when a YourPlay card is being used. By estimating the impact of the variables jointly the model is able to identify the marginal impact of each individual variable having adjusted for all of the other potential explanatory variables. Analysis of this particular data was undertaken using the Tobit regression model, which produces much better estimates when the value trying to be explained is 'censored' in one direction. In this case it is the large number of observations in which YourPlay turnover is \$0.00 which makes conventional approaches to modelling potentially unreliable.

Not all of the potential explanatory variables proved to be statistically significant in this sample, with the final model set out in Table 12.6. As there was an interaction between the impact of venue location and venue type these were included in the analysis in interacted form, e.g. metropolitan hotel, regional hotel, etc.

In reading Table 12.6 the column labelled 'coefficient' identifies the dollar value in monthly YourPlay turnover that would be expected from a unit change in the variable in question. The column labelled 'Std. Err.' reports the standard error of the coefficient estimate. And the columns labelled t-stat and P>t report the test of statistical significance for that explanatory variable; where P>t is less than 0.05 then the estimate is statistically significant at the 5 per cent level, the conventional measure of statistical significance. This measure of statistical significance means that there is only a 5 per cent chance that the coefficient value should actually be zero.

It is notable that the effect size of the individual variables is extremely small with few factors making a difference to monthly expenditure that is greater than \$1,500.

There were few variables whose sign was notable.

First, two machine technology providers – ALH and Token – were correlated (all other factors being equal) with lower average expenditures using a YourPlay card.

Table 12.6 Factors correlated with monthly venue YourPlay turnover, January 2016 to March 2018

	Coefficient	Std. Err.	t-stat	P>t
Intercept	1,156.210	4136.047	0.28	0.780
EGM entitlement of venue**	27.399	8.665431	3.16	0.002
Proportion of the region's population who speak a language other than English*	44.797	20.169	2.22	0.026
Average per capita taxable income in region (\$)	-0.049	.018	-2.75	0.006
Interaction variable for venue type and region (dummy variable, impact relative to regional club)				
Regional Hotel	-476.523	420.681	-1.13	0.257
Metropolitan Club**	-3,798.029	486.3526	-7.81	0.000
Metropolitan Hotel**	-2,403.262	516.1685	-4.66	0.000
Gaming machine turnover of venue (\$)*	0.0003	.0001	5.14	0.000
Proportion of the population by highest level of education completed				
Bachelors Degree	88.521	73.483	1.20	0.228
Graduate Certificate/Graduate Diploma	-593.232	416.316	-1.42	0.154
VET Certificate III & IV	75.788	115.792	0.65	0.513
VET Certificate I & II	-3,273.011	2604.31	-1.26	0.209
Years 10 to 12**	-280.998	73.677	-3.81	0.000
Year 9 or lower**	-350.835	89.263	-3.93	0.000
Index of relative socioeconomic disadvantage decile (relative to the first decile which is the most disadvantaged regions)				
2**	1,890.275	420.5134	4.50	0.000
3	-983.077	526.281	-1.87	0.062
4**	-1,961.09	486.572	-4.03	0.000
5**	-2,096.287	601.588	-3.48	0.000
6	-623.659	605.577	-1.03	0.303
7	-264.142	648.355	-0.41	0.684
8*	-1,633.948	672.989	-2.43	0.015
9	-865.369	714.889	-1.21	0.226
10 (least disadvantaged regions)	-2,549.156	924.224	-2.76	0.006
Technology service provider (relative to not known and low frequency providers)				
ALH**	-1,547.598	389.483	-3.97	0.000
Frontier**	1,411.231	520.268	2.71	0.007
HLM*	1,944.794	845.887	2.30	0.022
Mercury**	1,358.595	474.923	2.86	0.004
Momentum	-261.949	524.385	-0.50	0.617
PVS**	2,381.208	518.509	4.59	0.000
SGS	288.545	619.280	0.47	0.641
TGS	220.900	334.509	0.66	0.509
RSL**	2,844.465	427.185	6.66	0.000
Token*	-2,093.831	924.705	-2.26	0.024

Note: * = statistically significant at the five per cent level (the conventional threshold for statistical significance); ** = statistically significant at the one per cent level (conventionally regarded as highly statistically significant).

Second, higher socioeconomic status areas were correlated with lower utilisation of YourPlay, with highest usage rates in the second lowest decile.

Third, the turnover of a venue did not have a statistically significant relationship with its turnover using YourPlay cards, even when potentially confounding factors such as the number of gaming machine entitlements and the type of the venue and its location were included.

Finally, the total explanatory power of all of the included variables was very low, around 8 per cent. This suggests that usage of YourPlay was largely driven by unobserved venue specific characteristics.

It is not possible to determine from the available information what these unobserved factors may be, and whether or not they are within the venues' ability to influence them. It could be that these venue specific variations are due to factors entirely outside of the venues' control, such as the demographics of their gamblers and/or preferences and underlying willingness to use YourPlay of the gaming machine gamblers using their venue.

Alternatively these venue specific variations in usage could be due to factors within the venues' control, such as the relative attractiveness of their loyalty system (if they have one), the quality of the YourPlay related technology purchased (see the mystery shopping analysis set out in Chapter 14 which found that in 21 per cent of cases researchers could not join or use the scheme due to equipment failures of the system being down in that venue); poorer training of staff and managers; attitudes of staff and managers to YourPlay; or the time allocation decisions of the venues leading to managers and staff not having sufficient time to promote YourPlay to their gamblers.

13. YourPlay Cardholders' Views on Obtaining and Using YourPlay

13.1 Survey approach

Rationale for surveying cardholders

Information on the reasons why gamblers chose to request a YourPlay card, and their experiences with it, are important both in steering future marketing and promotion of the scheme, and in assessing its actual and potential impacts. However users of YourPlay have proved a difficult group to access in more conventional data collections such as telephone surveys of gamblers. For example the first wave telephone survey undertaken as part of this evaluation which contacted 600 individuals who were gaming machine gamblers at the time of the 2015 Victorian Gambling Survey only had eight respondents who had obtained a YourPlay card. This sample was too small for meaningful analysis and so an alternative needed to be identified which could capture a large enough number of YourPlay users.

The low take-up of YourPlay also suggested other more general fieldwork such as in-venue or exit surveys of gaming room patrons were unlikely to be cost effective and indeed were unlikely to result in a workable sample size.

The most feasible approach identified was to directly survey those YourPlay users who had indicated when registering that they would be willing to be contacted about potentially participating in research. Although this group is unlikely to be entirely representative of the broader population of YourPlay cardholders (representing only 3.3 per cent of total cards that have been in use at least once) it gives the best available sample frame for exploring their experiences.

Methodology

A survey was developed in consultation with the Department of Justice and Community Safety covering key topics such as the characteristics of the gambler, reason(s) for joining the scheme, the experience of joining, satisfaction with YourPlay, the extent to which gambling behaviours have been influenced by the scheme, and if they have ceased using YourPlay why they had done so. Completion of the online survey took on average between 12 and 15 minutes.

All respondents were offered a \$30 Coles Myer voucher as recompense for their time. Contact details were requested in a form that could be detached from the dataset prior to analysis.

Ethics approval was granted by the University of Adelaide's human research ethics committee, as a low risk project.

The sample frame for the project was the 1,221 registered YourPlay users who had indicated that they were willing to be contacted to participate in research about YourPlay and had provided a postal or email address.¹⁴

As the consent provided by these YourPlay users was that they could be invited to participate in research, not that their contact details could be passed on to researchers, no contact details were made available to the researchers. Contact details for these individuals were held by Intralot Gaming Services, the system operator, and as such Intralot were responsible for distributing the survey with no potentially identifying information provided to SACES.

An initial 396 YourPlay cardholders were randomly selected within strata to ensure that the selected sample frame had the same proportions who signed up at a hotel/club or the Melbourne Casino, and the same distribution by contact type, as the overall population. The list of IDs for this sample frame was provided to Intralot who were responsible for contacting the potential participants.

Intralot were provided with unaddressed stamped envelopes containing the participant information sheet, the survey and reply paid envelope for those individuals whose only contact information was a postal address. For those potential respondents whose contact details were an email address, Intralot were provided with a .pdf version of the participant information sheet, and text for an introductory email including a link to the websurvey version of the survey delivered through Survey Monkey.

The initial sample produced fewer responses than anticipated and so the survey was extended to the remaining 725 YourPlay cardholders who had not been included in the first sample.

¹⁴ There were an additional 730 individuals in the dataset who had agreed to be contacted about participating in research, but who had not provide an address.

Responses were received from 101 of the 1,221 YourPlay cardholders invited to participate in the survey, a response rate of 8.3 per cent. Not all respondents completed every question, and so there is some variation in the sample size for specific questions. This is indicated by table or figure notes.

As the survey was 'blind' from the point of view of SACES, with no details supplied by Intralot, all of the results presented in this report are unweighted as it is not possible to identify the demographic characteristics of the overall sample frame, and therefore not possible to identify appropriate population weights.

The lack of demographic data on YourPlay users as a whole means that it is not possible to identify whether or not the survey respondents were representative of the broader population of cardholders. If the characteristics of our respondents differ from the broader population then the survey responses may overstate or understate satisfaction and impact.

Demographics

A majority of respondents (80 per cent) who participated in the survey lived in Melbourne. This result is broadly consistent with the proportion of the state's general population that lives in Greater Melbourne (76 per cent).¹⁵ A similar share of respondents lived in Inner Melbourne (41 per cent) and Outer Melbourne (39 per cent). A combined total of 15 per cent were living in regional cities, rural or remote areas, while the remainder did not identify their place of residence.

Table 13.1 Where respondents live

	Per cent
Inner Melbourne	41
Outer Melbourne	39
Regional city	9
Rural or remote	6
Prefer not to say	4
Interstate or overseas	1
Total	100

n = 85 respondents

People who responded to the survey were less likely to be employed and more likely to be unemployed relative to the broader Victorian gambling population. Approximately 41 per cent of respondents to the YourPlay survey were employed, whereas the 2014 Victorian Prevalence Study (Hare, 2015) found that almost 61 per cent of Victorian EGM gamblers were employed. Similarly, 12 per cent of survey respondents were 'looking for work' compared to 5.2 per cent of Victorian gamblers. Almost one quarter of survey respondents were retired (i.e. 'retired' or 'pensioner').

Table 13.2 Work status

	Per cent
Employed working full-time	33
Employed working part-time	8
Home duties	7
Retired	11
Looking for work	12
Studying	5
Pensioner	13
NewStart Allowance	1
Other	5
Prefer not to say	5
Total	100

n = 85 respondents

Respondents were most likely to be living in a lone household (36 per cent), while living in a couple household was the next most common living situation (28 per cent). One quarter of respondents were living as part of families with children.

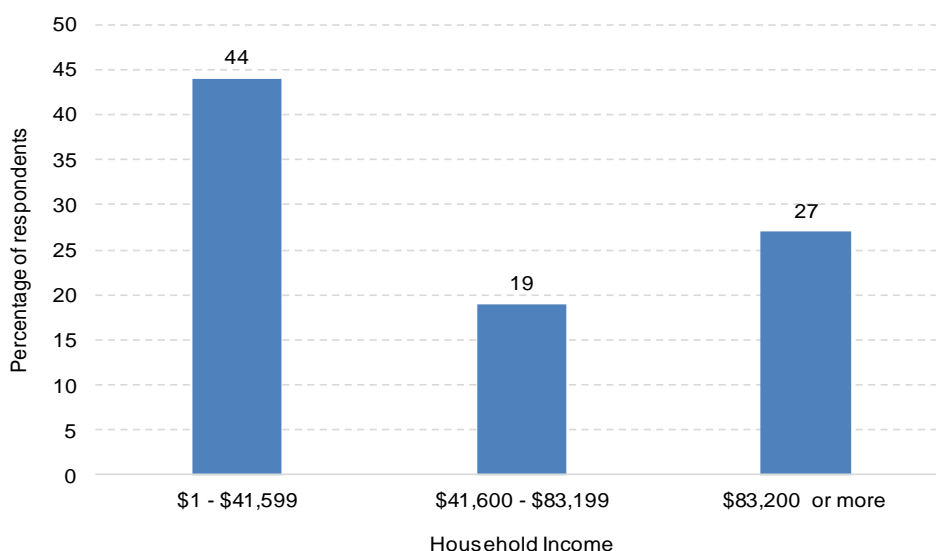
¹⁵ ABS, Regional Population Growth, Australia, 2016-17 (Cat. No. 3218.0).

Table 13.3 Household structure

	Per cent
Single	36
Couple	28
Group household	9
Family with predominantly younger children (under 15)	12
Family with predominantly older children	12
Prefer not to say	5
Total	100

n = 85 respondents

Given that survey respondents were less likely to be employed, it is not surprising to find that a relatively large proportion of survey respondents had low incomes – see Figure 13.1, which provides a distribution of respondents based on their household income. Approximately 44 per cent of respondents reported an aggregate annual household income of \$1 to \$41,599. Although an imperfect comparison, 2016 Census data indicates that 24 per cent of Victorian households comprised of families and lone persons had an equivalent household income within this range.¹⁶

Figure 13.1 Survey respondents' annual household income, per cent^(a)

n = 84 respondents, 10 per cent of whom responded 'prefer not to say'

Note: (a) Excludes income of housemates if living in a group household.

Respondent's EGM gambling

Risk level

The level of risk of the respondents' gambling behaviours and attitudes was assessed using the Problem Gambling Severity Index (PGSI). The PGSI uses a five point scale (never = 0, rarely = 1, sometimes = 2, often = 3, always = 4) to rate the severity of various gambling related behaviours in terms of their risk. Individuals are then classified to one of four gambling risk categories based on their total scores (0 = non-problem gambler, 1-2 = low-risk gambler, 3-7 = moderate-risk gambler, 8-27 = problem gambler or high risk).

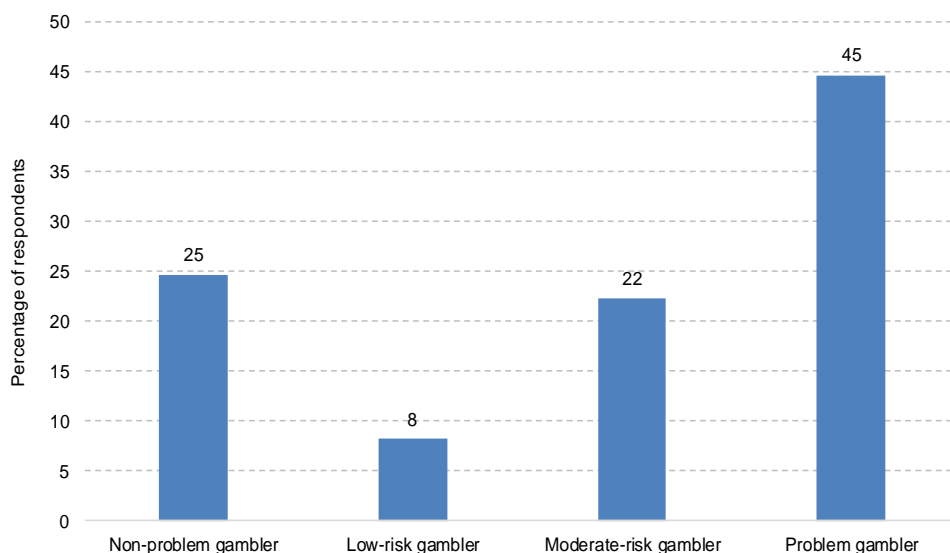
Nearly half of the sample (45 per cent) were classified as 'problem gamblers' using this index, see Figure 13.2. This result is substantially higher than the proportion of gaming machine gamblers (2.5 per cent) that were assessed as being problem gamblers in the 2014 Victorian Gambling Study (VGS).¹⁷ A further 22 per cent of YourPlay survey respondents were assessed as being a 'moderate risk' gambler (compared with 8.1 per cent of all gaming machine gamblers in the 2014 prevalence study), 8 per cent as 'low risk' (c.f. 17 per cent), and a quarter of the sample as non-problem gamblers (c.f. 72 per cent). These results suggest that people who have a high risk of problem gambling are more likely to use YourPlay.

¹⁶ Based on reported total household weekly income converted to an annualised figure.

¹⁷ SACES calculations.

Respondents to our survey are, however, much more comparable to the gambling risk profile of those respondents to the 2014 VGS who gambled most frequently. Amongst those respondents to the 2014 VGS whose self-reported gambling frequency was either 'almost once per week to three times per week' or 'more than three times per week' 21 per cent were rated as problem gamblers based in the PGSI, with a further 36 per cent assessed as moderate risk gamblers and 22 per cent low risk gamblers.¹⁸ In other words of those respondents to the 2014 VGS who gambled at least weekly, only 21 per cent were non-problem gamblers compared to 25 per cent of the respondents to the current survey.

Figure 13.2 Respondents by Problem Gambling Severity Index Category, per cent



n = 85 respondents

Time and money spent gambling

Survey respondents were asked how much time and money they spent playing gaming machines on average each time they visited a gaming venue in the last twelve months. Table 13.4 shows the average time and amount spent by gamblers based on their gambling risk severity. Figures in brackets indicate the lowest and highest responses received.

Both problem gamblers and moderate-risk gamblers indicated they spend around 5 hours on average at a gaming venue each time they visited. Interestingly, non-problem gamblers on average reported that they spend 4.6 hours on average playing gaming machines during each visit, whereas low risk gamblers reported an average time played of 1.9 hours. The average result for 'non-problem' gamblers is partly skewed by one respondent indicating they spent 23 hours at a venue gambling in a typical gambling session; excluding this result, the average time spent for non-problem gamblers drops to 3.5 hours.

Table 13.4 Average time and money spent gambling during each visit in last 12 months by risk of problem gambling

Average, (lower bound and upper bound) responses

Gambling risk	Hours	Amount (\$)
Problem gamblers	5.0 (1–12.5)	596 (10 – 7,001)
Moderate-risk gamblers	4.8 (1–15)	155 (10 – 1,000)
Low-risk gamblers	1.9 (1– 2.5)	155 (20 – 500)
Non-problem gamblers	4.6 (1 – 23)	46 (7.5 – 100)

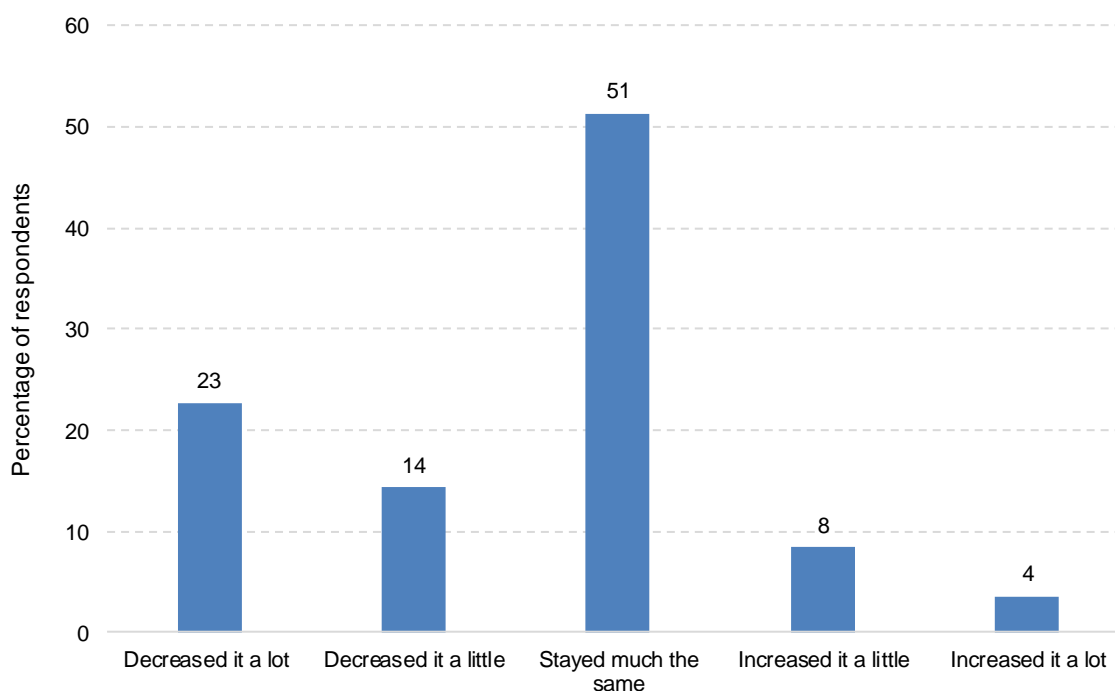
n = 85 respondents

¹⁸ SACES calculations from 2014 VGS data. Risk levels were even higher for gamblers whose frequency was 'more than three times per week' however as this gambling frequency had a low number of responses we regard the standard errors as being too large for it to be reported on its own and as such have reported the combined risk levels for the two highest gambling frequencies.

Spending on EGMs is expressed in terms of “net gaming revenue”, e.g. the difference between what they started with (including any additional money withdrawn or borrowed during the period of play) and what was left over after finishing the pokies session (and questions on expenditure on the survey included this definition). Respondents who were assessed as being at higher risk of problem gambling had (perhaps not surprisingly) a higher average spend per visit. For example, high-risk gamblers reported an average spend of \$596 per visit, whereas non-problem gamblers reported an average spend of \$46.

Respondents were asked whether the overall amount spent on gambling on pokies stayed the same, increased or decreased in the last twelve months. Approximately half of respondents said that it stayed much the same in the past twelve months (see Figure 13.3). On balance, more respondents indicated that their spending on pokies had decreased in the last 12 months than increased (37 per cent compared to 12 per cent respectively). In fact, almost one-quarter indicated that it has decreased ‘a lot’.

Figure 13.3 Change in overall amount spent on gambling on gaming machines in the last twelve months, per cent



n = 84 respondents

13.2 Gambling behaviours

The number of times respondents engaged in playing pokies or electronic gaming machines in the past twelve months is illustrated by Figure 13.4. Five per cent of respondents reported they had not played gaming machines in the last twelve months, and 29 per cent of respondents reported that they had played less than once a fortnight on average. At the other end of the scale, 22 per cent reported playing at least once a week but less than 100 times a year, and 28 per cent reported playing more than 100 times over the last year.

Victorian pubs or hotels were the most popular venues for gambling on pokies (66 per cent of respondents) followed by Victorian clubs (34 per cent) and the Melbourne Casino (20 per cent).

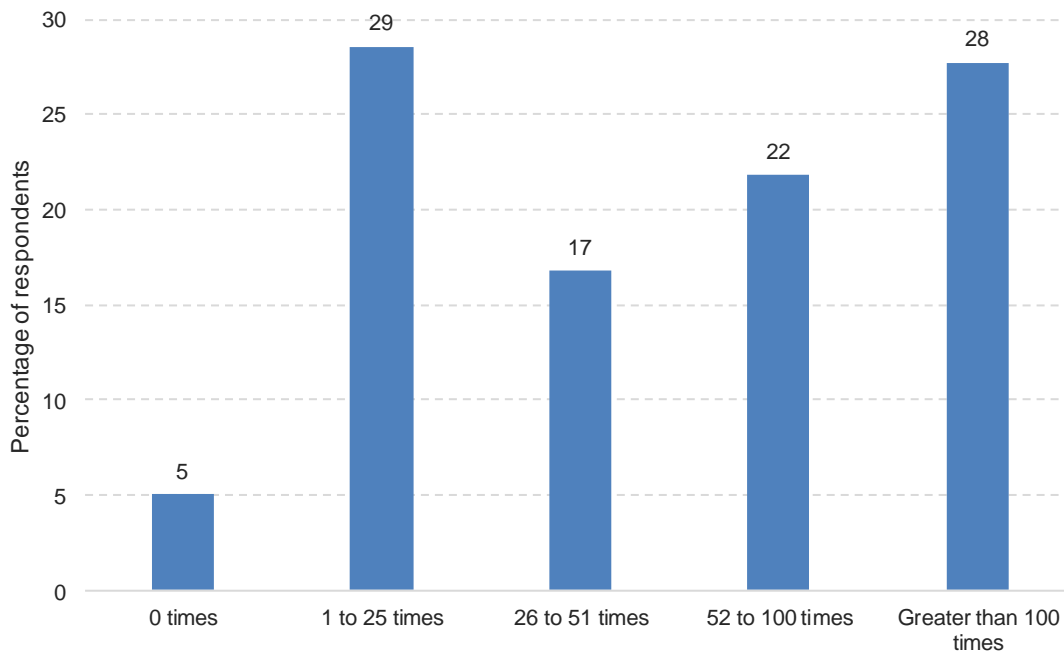
Further analysis shows that high-risk gamblers most frequented Victorian pubs or hotels (74 per cent); followed by the Melbourne Casino (29 per cent) and Victorian clubs (26 per cent). Victorian pubs or hotels were also the most frequented place for moderate-risk gamblers (78 per cent), followed by Victorian clubs (28 per cent) and the Melbourne Casino (17 per cent).

Respondents who played gaming machines on the internet were disproportionately likely to display risky behaviours in their gambling, however the sample size is very small and these results need to be treated with caution.

Some of these relationships between gambling risk level and venue were statistically significant. Problem gamblers and moderate risk gamblers were both statistically significantly more likely to gamble at Victorian pubs or hotels (although in the case of moderate risk gamblers the relationship is only significant at the 10 per

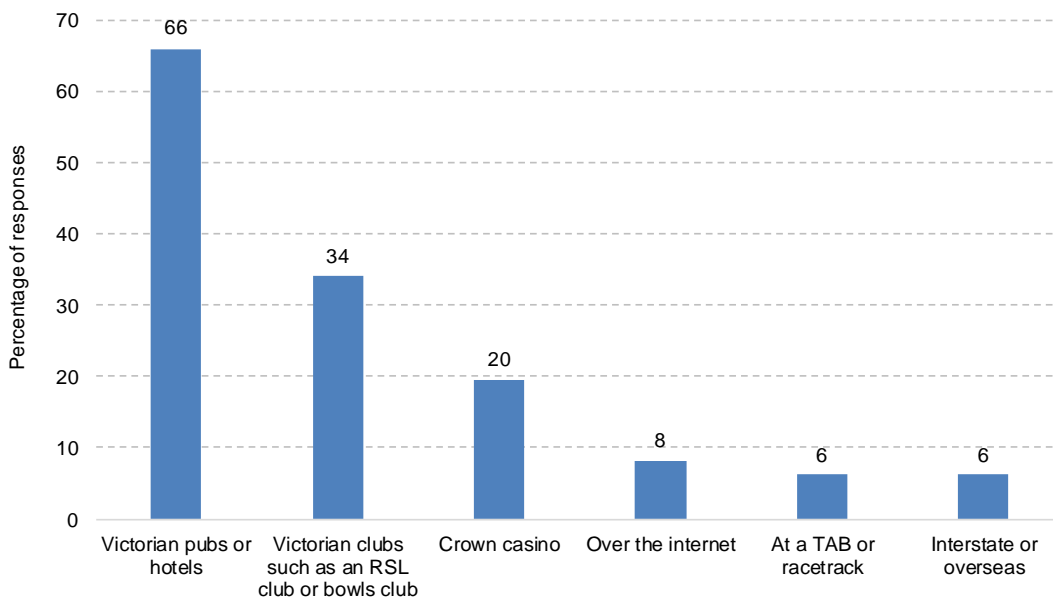
cent level). Problem gamblers were statistically significantly more likely to gamble at the Melbourne Casino, although this was only significant at the 10 per cent level. And those gamblers who reported multiple venues were statistically significantly more likely to be rated as low risk gamblers. None of the other gambling venue types had a statistically significant relationship with gambling risk level.

Figure 13.4 Number of times a player have played electronic gaming machines in the last 12 months, per cent



n = 101 respondents

Figure 13.5 Types of venues visited by respondents to typically play gaming machines, respondents could select more than one type of venue, per cent



n = 97 respondents

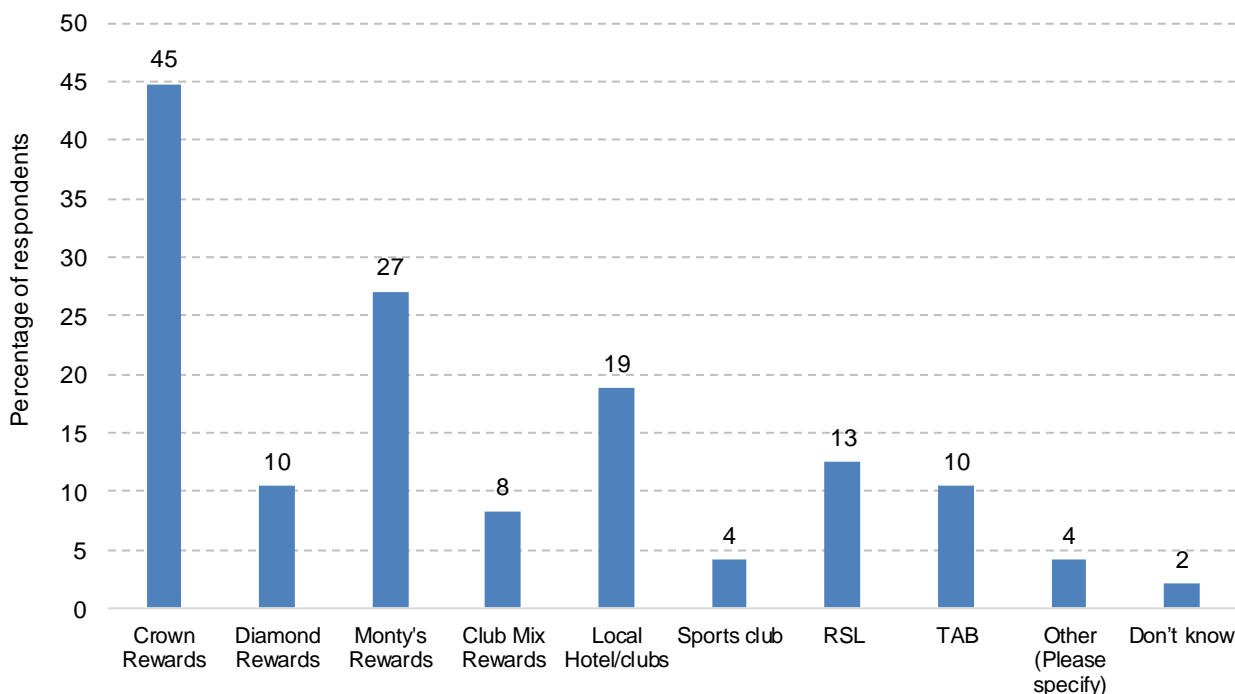
Note: Respondents could select more than one type of venue and so responses will sum to more than 100 per cent.

Loyalty or Rewards Program Participation

Just over three-quarters of respondents (77 per cent) reported that they were currently a member of a gambling loyalty or rewards program. A further 15 per cent reported being members previously but not now, while the remaining 8 per cent had never been a member.

For those respondents who are current members or were members in the past, 21 per cent reported being members of multiple loyalty programs. Crown Rewards was the most popular loyalty program with 45 per cent indicating they were a current or past member (see Figure 13.6). The next most popular rewards program was Monty's Rewards (27 per cent), followed by a local hotel/club program (19 per cent) and RSL (13 per cent).

Figure 13.6 Current or past membership of venue based loyalty programs^(a), respondents could select more than one program, per cent



n = 93 respondents

Note: (a) Expressed as a proportion of those who were, or who had been, a member of a gambling or loyalty program. Respondents could provide more than one program and so responses will sum to more than 100 per cent.

Looking in more detail at those respondents who were a member of at least one loyalty scheme, and who had answered the questions that allowed them to be assigned to a gambling risk level did not identify any differences in patterns of membership between gambling risk levels that were statistically significant.

13.3 Obtaining and using YourPlay

The generally low take-up rate of YourPlay cards amongst Victorian EGM gamblers, makes it important to understand what factors influence gamblers to access a YourPlay card, and what benefits they perceive as arising from its use. This can then be used to ensure that any changes to the scheme preserve the features of the scheme valued by existing users, and that marketing and communications activities are targeted at areas that are more likely to engage potential participants.

Signing up for YourPlay

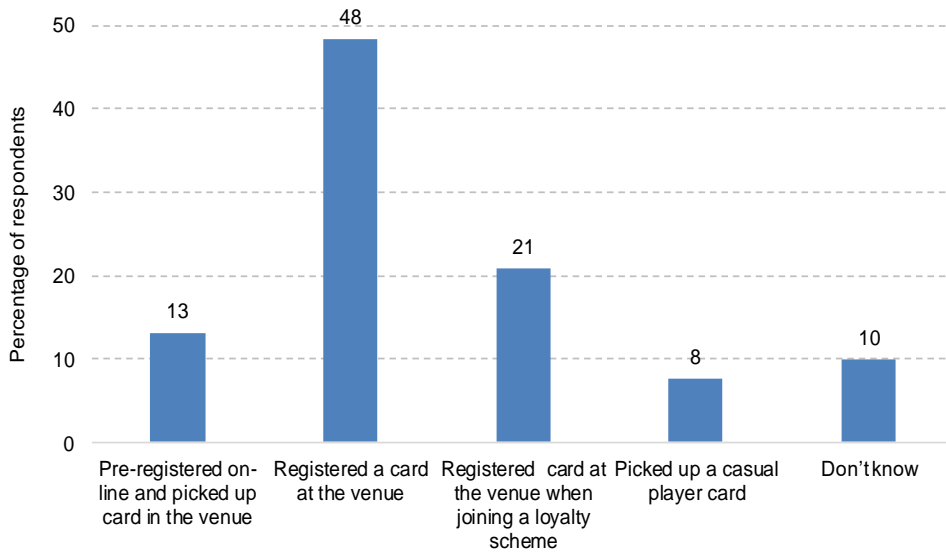
People that are or were a member of a gambling loyalty or rewards program were asked whether a staff member offered YourPlay when they signed up for, or renewed, their loyalty card. Of these respondents, 51 per cent indicated they were offered YourPlay when applying for or renewing their loyalty card, while 33 per cent indicated they were not offered YourPlay. The remaining 16 per cent did not know or could not remember if they were offered YourPlay. As gambling venues are legally required to offer YourPlay when signing or renewing a loyal card, the relatively large negative response suggests a high degree of non-compliance with current legislative requirements.

YourPlay card holders were asked whether they registered for their card at the venue or picked up a casual player card. Almost half of respondents (48 per cent) registered for YourPlay at the venue, while a further 21 per cent registered at the venue when joining a loyalty scheme (see Figure 13.7). Approximately 13 per cent reported pre-registering on-line and picking up a card at the venue. In total, 82 per cent of respondents picked up a registered card while only 8 per cent picked up a casual player card.

This reinforces the central role of venues as a route to the card, but also reinforces the risks to the scheme posed by the widespread difficulties in obtaining functional YourPlay cards from venues that were highlighted in the mystery shopping research undertaken as part of this evaluation (see Chapter 14). During the mystery

shopping research we found that only 69 of the 157 visits undertaken resulted in a card being supplied by the venue and only 38 of those cards actually worked in the venue.

Figure 13.7 How respondents obtained their registered YourPlay card or obtained a casual player card, per cent



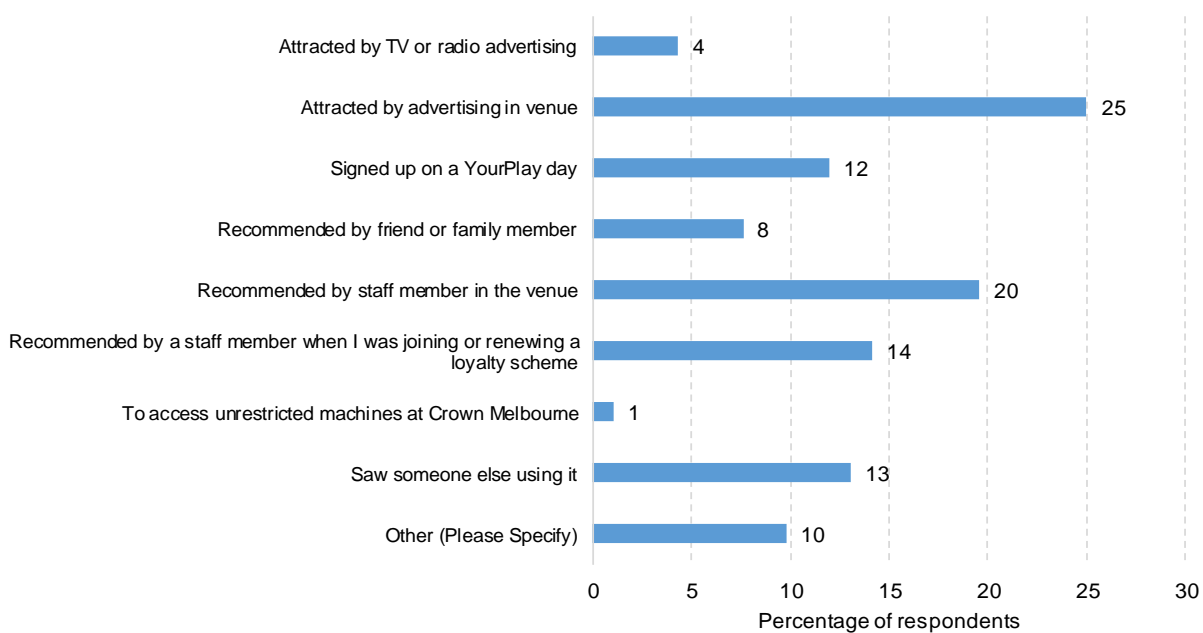
n = 91 respondents

Attractions and benefits of YourPlay

Those factors that prompted respondents to get a YourPlay card are summarised in Figure 13.8. One quarter of respondents were attracted by advertising in a venue whereas only 4 per cent were attracted by TV or Radio advertising. It is not clear whether this reflects in-venue pathways being much more appropriate for potential users of YourPlay cards, or a specific limitation with the ‘mass market’ advertising undertaken. The next most common forms of prompts after in venue advertising were recommendation by a staff member in the venue (20 per cent), recommendation from a staff member when joining or renewing a loyalty scheme (14 per cent), saw someone else using it (13 per cent), and being signed up on a YourPlay day (12 per cent).

These patterns broadly held when the data was analysed by gambling risk level. For example, for both high risk gamblers and moderate risk gamblers, advertising in the venue was also the most common prompt for getting a YourPlay card (26 per cent of high-risk gamblers and 37 per cent of moderate risk).

Figure 13.8 Factors that prompted respondents to get a YourPlay card, respondents could select more than one, per cent

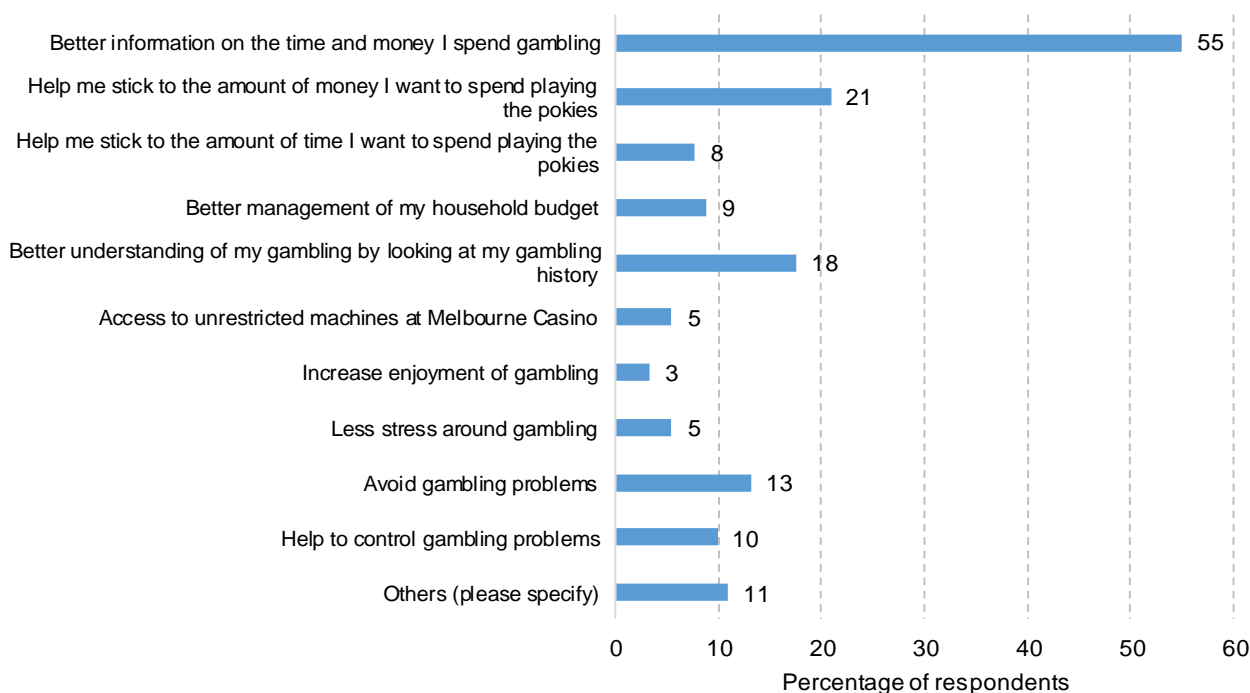


n = 92 respondents

Note: Respondents could provide more than one factor and so responses will sum to more than 100 per cent.

When respondents were asked what benefits they had hoped they would get when they started to use YourPlay, by far the most common benefit was considered to be 'better information on the time and money they spend gambling', with 55 per cent of respondents highlighting this potential benefit (see Figure 13.9). The next most common benefits were 'helping stick to the amount of money they want to spend playing the pokies' (21 per cent), 'getting a better understanding of their gambling by looking at their gambling history' (18 per cent), and 'help avoid gambling problems' (13 per cent). These results indicate that respondents primarily view YourPlay as a useful tool for monitoring and managing their gambling behaviour.

Figure 13.9 Benefits respondents hoped they would get when they started using, respondents could report more than one anticipated benefit, per cent



n = 91 respondents

Note: Respondents could provide more than one potential benefit and so responses will sum to more than 100 per cent.

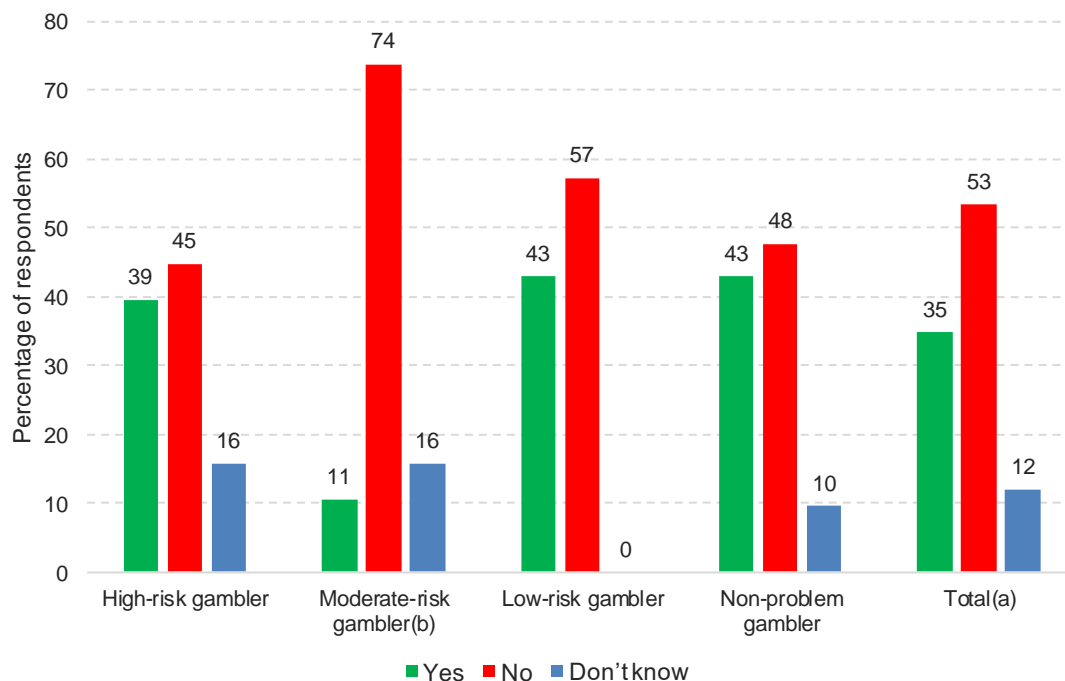
'Getting better information on the time and money they spend' was also by far the most common benefit hoped for by high risk gamblers (61 per cent) and moderate risk gamblers (58 per cent).

Money and time limits

A slight majority of respondents (53 per cent) indicated that they did not use YourPlay to set a limit on the time and money they spend, while just over one-third (35 per cent) indicated that they did set a limit on time and money (see Figure 13.10).

The extent to which cardholders reported having set a limit on time and money spent gambling was broadly consistent across gambling risk levels with one exception, moderate risk gamblers were significantly less likely to report that they had used this feature of the system, with only 11 per cent of having set a time and money limit. The differences in use of this feature between the other risk categories were not statistically significant.

Those respondents who had used YourPlay to set a limit (n=32) were asked about what limits they set in terms of time and money. The quality of responses to this question was generally poor, and the number of responses was low. In addition to a small number of respondents not being able to recall or preferring not to state their limits, some respondents provided nonsensical responses (e.g. daily time limit in excess of 24 hours). One respondent also had a very erratic response. The following analysis must consequently be treated with a high degree of caution, particularly for those risk categories with very few respondents (i.e. moderate and low risk gamblers).

Figure 13.10 Use of YourPlay to set a limit on time and money to gamble, per cent^(a)

n = 92 respondents

Note: (a) Total includes respondents whose gambling risk could not be assessed.
 (b) Difference in use is statistically significant.

Table 13.5 summarises the average spend and time limits, including low and high responses, by risk category of the gambler. Respondents that set a limit reported an average daily spend limit of \$515 and an average weekly spend limit of \$5,170. It is important to note that these averages are skewed by a single large response. For example, the corresponding median daily and weekly spend limits were just \$50 and \$100 respectively, indicating that most respondents who completed this question actually set relatively low limits.

The skewing of results particularly applies to high risk gamblers. For example, while the average daily spend limit for high risk gamblers was \$966 dollars, the median limit was just \$50, which is equivalent to the median daily limit for both non-problem and all gamblers (\$50 respectively). Such skewing of results is not surprising given that YourPlay enables cardholders to set very large spend limits.

Respondents were also asked whether a staff member of the venue suggested a level for the limit. Of those respondents who set a limit, 32 per cent reported the daily and/or weekly limit that was suggested by the staff member. Approximately 16 per cent indicated a spend limit was suggested by a staff member but could not remember what the limit was, while a further 28 per cent indicated they preferred not to say if a limit was suggested or that no limit was suggested. The most common daily spend limit suggested by a staff member was \$50, while the most common weekly limit suggested was \$100. One respondent reported that a daily spend limit of \$10,000 was suggested.

Even fewer respondents indicated that a staff member suggested a daily or weekly time limit, with just 16 per cent (n=5) of respondents stating a specific daily time limit that was recommended by a staff member. A large proportion of respondents did not provide a response to this question, or indicated they preferred not to say.

Table 13.5 Time and money limits set by respondents by risk of problem gambling^(a)
Average, low and high responses

	High-risk	Moderate-risk	Low-risk	Non-problem gambler	Total ^(b)
Limit on spending per day (\$)	966 (1-10,000)	160 (20-300)	75 (50-100)	106 (20-400)	515 (1-10,000)
Limit on spending per week (\$)	8,925 (1-70,000)	nr	75 (50-100)	206 (23-400)	5,170 (1-70,000)
Limit on time gambling per day (hours)	11.5 (0.5-24)	3 (3-3)	1.5 (1-2)	4.7 (2-10)	7.7 (0.5-24)
Limit on time gambling per week (hours)	57.2 (1-168)	nr	1.5 (1-2)	6.7 (5-10)	33 (1-168)

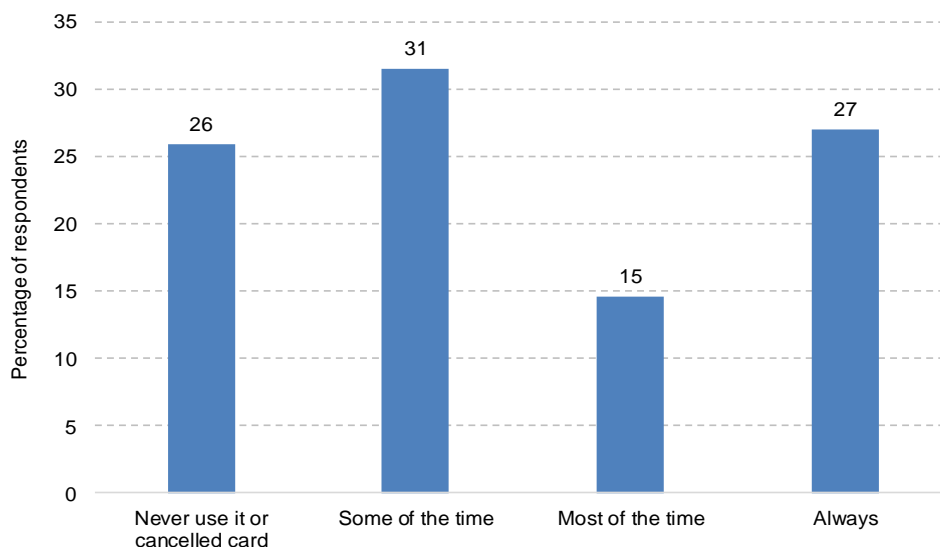
n = 32 respondents

Note: (a) The quality of responses to this question were quite variable and so the analysis should be treated with caution.
 (b) total includes respondents (n = 3) that were not assessed for risk of gambling.
 nr = no response. na = not available (includes respondents that did not respond, prefer not to say, can't remember etc.).

13.4 Use of YourPlay

When respondents were asked about how often they used their YourPlay card when gambling, one quarter (26 per cent) stated that they never used it or cancelled the card, while a further 31 per cent said they used it only some of the time (see Figure 13.11). Approximately 27 per cent said that they always used it, while 15 per cent reported using YouPlay most of the time. Hence fewer than half of YourPlay cardholders seem to be using their cards on a regular basis.

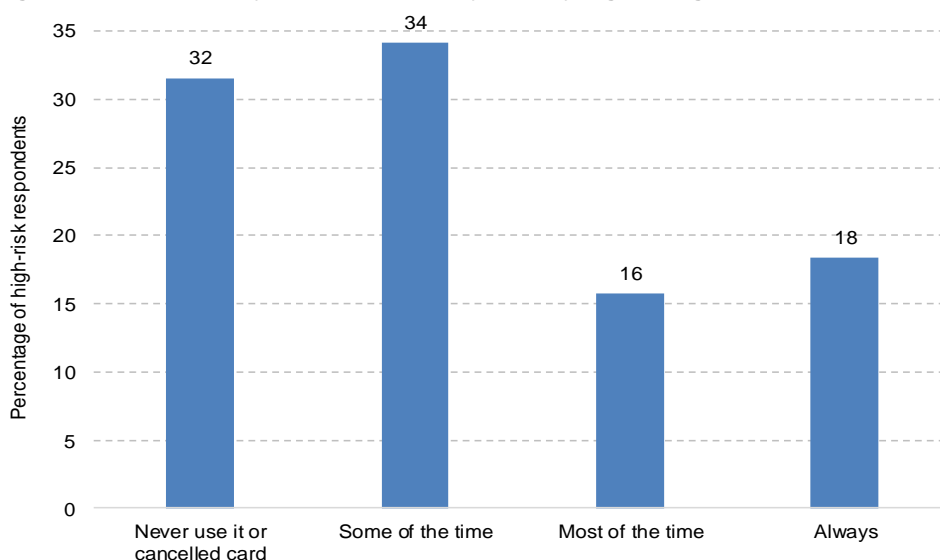
Figure 13.11 Frequency of use of YourPlay card, per cent



n = 89 respondents

High risk gamblers were even less likely to use their YourPlay card when gambling with only about a third using it on a regular basis ('most of the time' or 'always', see Figure 13.12). Some 18 per cent of high risk respondents used their YourPlay card always compared to 27 per cent of all gamblers, while a similar proportion of both groups used it most of the time. At the other end of the scale, 32 per cent of high-risk gamblers never use their YourPlay card or have cancelled their card, which is slightly higher than for all respondents (26 per cent).

Figure 13.12 Frequency of use of YourPlay card by high-risk gamblers, per cent

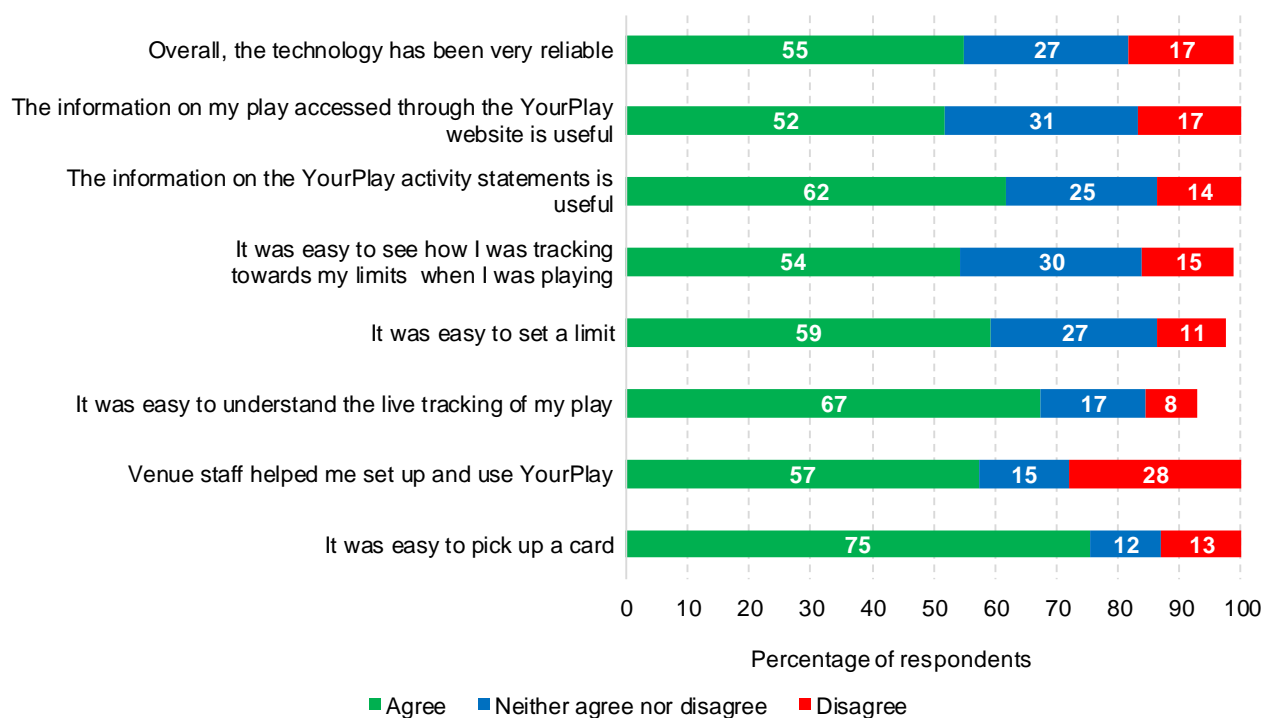


n = 38 respondents

The degree of agreement and disagreement with various statements regarding usability of YourPlay by respondents is illustrated by Figure 13.13. 'Agree' here combines responses that 'strongly agree' and 'agree somewhat', while 'Disagree' combines responses that 'disagree somewhat' and 'strongly disagree'.

A majority of the respondents agreed with the various statements on usability of YourPlay, while a further large proportion generally neither agreed nor disagreed.

Figure 13.13 Agreement with usability of YourPlay, per cent



n = 85 respondents

Note: Totals that sum to less than 100 per cent are due to non-responses.

The highest level of agreement concerned that it was 'easy to pick up a card' (75 per cent). There were also relatively high agreement in respect of YourPlay 'making it easy to understand the live tracking of my play' (67 per cent) and 'information on the YourPlay activity statement is useful' (62 per cent). These are significant results given that obtaining better information on the time and money spent gambling was considered the most common benefit that would be gained from using YourPlay.

A lower proportion of respondents agreed that 'the information on my play accessed through the YourPlay website is useful' than agreed that 'information on the YourPlay activity statement is useful' (52 per cent c.f. 62 per cent). This result suggests there may be some features or presentational aspects of the activity statements that respondents prefer, which in turn could be integrated into the website (assuming this result simply does not reflect a preference for activity statements).

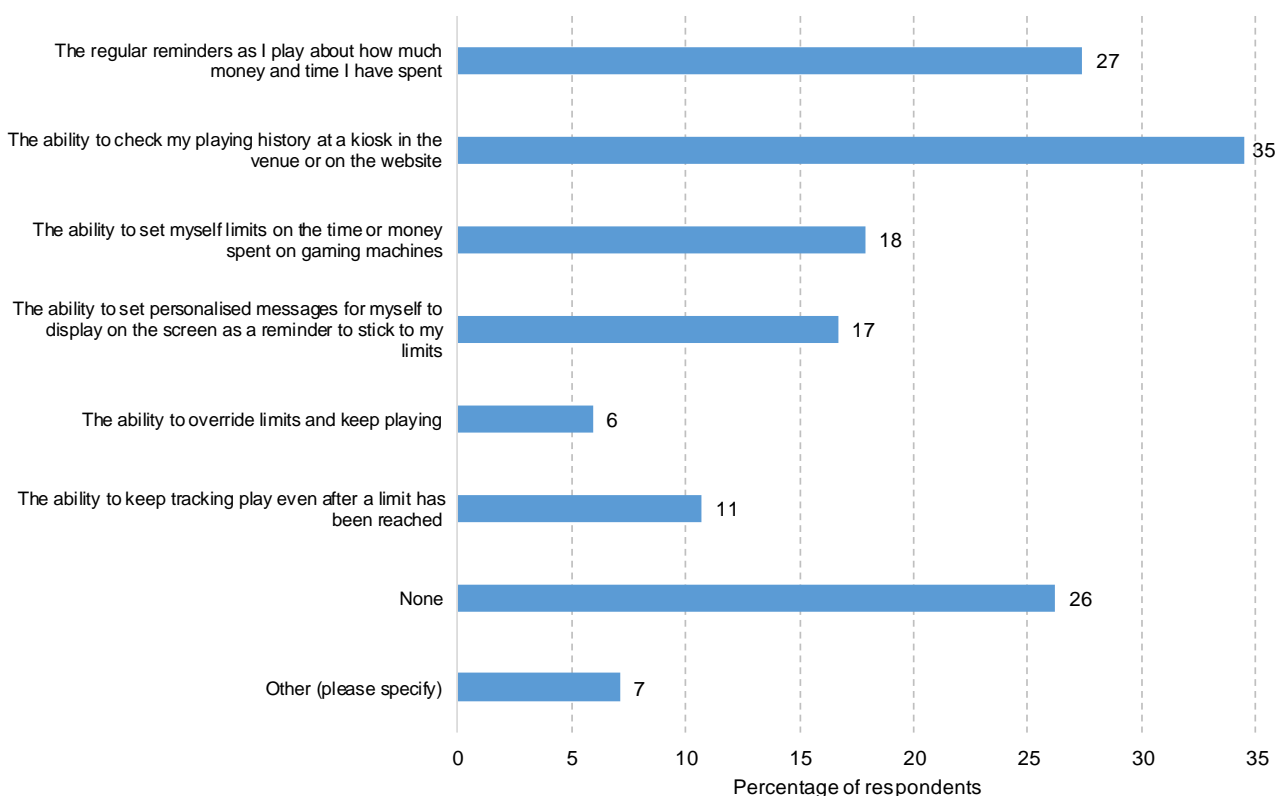
The highest level of disagreement was expressed in respect of venue staff helping the individual to set up and use YourPlay (28 per cent disagree). Nonetheless, a majority (57 per cent) still agreed that venue staff helped in this respect.

Respondents were asked what features of YourPlay they liked. The most popular feature was the ability to 'check their playing history at a kiosk in the venue or on the website', with 35 per cent of respondents choosing this option (see Figure 13.14). The next popular features were the 'regular reminders during play about how much money and time has been spent' (27 per cent); the 'ability to set time and money limits' (18 per cent); and the 'ability to set personalised reminder messages on screen' (17 per cent).

A significant proportion of respondents (26 per cent) did not identify any feature, which suggests a degree of ambivalence regarding benefits provided by YourPlay.

Survey participants were also asked to identify the benefits they **actually received** from using YourPlay. The most common actual benefit identified by respondents (37 per cent) was 'better information on the time and money they spend gambling' (see Figure 13.15).

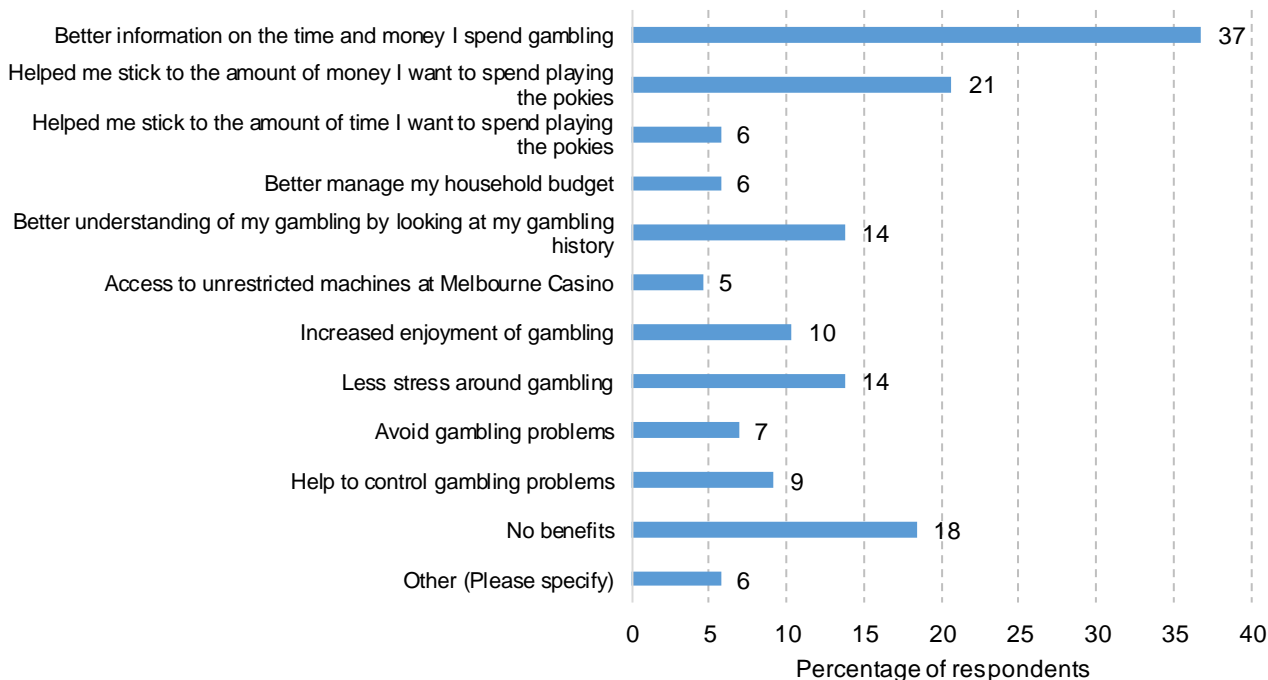
Figure 13.14 Features of YourPlay liked by respondents, respondents could select more than one, per cent



n = 84 respondents

Note: Respondents could provide more than one feature they liked and so responses will sum to more than 100 per cent.

Figure 13.15 Benefits actually received from using YourPlay, respondents could select more than one, per cent



n = 87 respondents

Note: Respondents could provide more than one benefit and so responses will sum to more than 100 per cent.

The next most common benefits were ‘helping individuals stick to the amount of money they want to spend’ (21 per cent); ‘experiencing less stress around gambling’ (14 per cent); and ‘getting a better understanding of their gambling by looking at their gambling history’ (14 per cent). The latter reinforces that providing better

information on time and money spent gambling is the primary benefit provided by YourPlay. On the other hand, approximately 18 per cent of respondents reported receiving no benefit from using YourPlay.

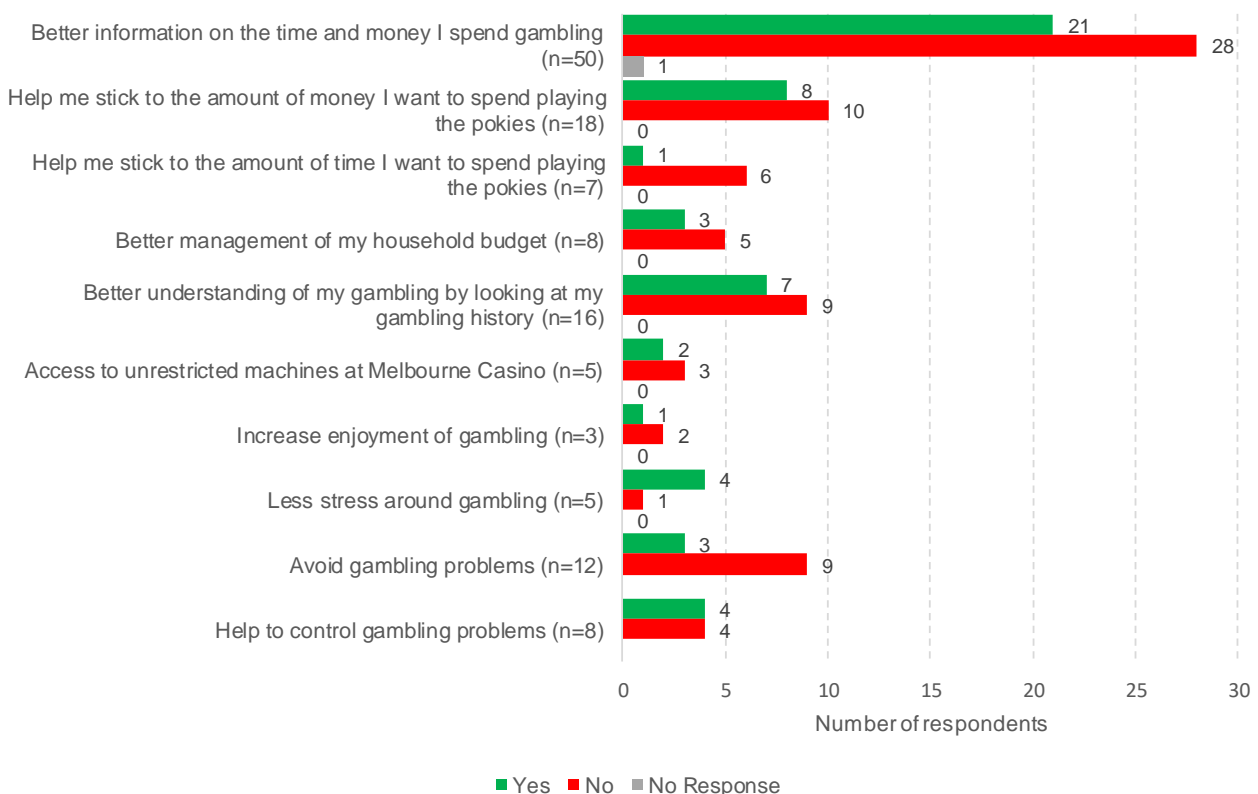
Comparing these benefits actually received with the benefits respondents had hoped for when joining YourPlay suggests a significant gap between expectations of the scheme and gamblers actual experiences with it (see Figure 13.16). For each form of potential benefit respondents indicated that they had hoped to receive from YourPlay, this chart identifies whether they reported that they had actually received the benefit. Please note that the data in Figure 13.16 is in number of respondents not per cent, and so it will not align directly with the data presented in Figure 13.15.

Although for each hoped for benefit only some of the respondents anticipating it reported actually receiving it, this does not mean that respondents did not feel that they had benefited from the scheme (only 18 per cent of respondents reported receiving no benefits from the scheme), but rather that the actual benefits reported often differed from those anticipated.

Comparing these benefits actually received with the benefits respondents had hoped for when joining YourPlay suggests a significant gap between expectations of the scheme and gamblers actual experiences with it. For example, of the fifty respondents who reported that they hoped that using YourPlay would mean that they had 'Better information on the time and money I spend gambling', 21 of them reported actually receiving this benefit and 29 did not include it as a benefit they actually received (1 respondent answered the question on hoped for benefits but did not answer the question on whether they had been received).

This is not to say that respondents did not feel that they had benefited from the scheme (only 18 per cent of respondents reported receiving no benefits from the scheme), but rather that the actual benefits reported often differed from those anticipated.

Figure 13.16 Whether hoped for benefits were identified as a benefit actually received by the respondent, numbers of respondents, respondents rated each item they selected in response to the hoped for benefits question, which was more than one in some cases, number of respondents



n = 87 respondents in total, sample size for each hoped for benefit as shown in the bar label

Note: Respondents could provide more than one benefit and so responses will sum to more than the total number of respondents.

Finally, respondents who never used YourPlay or have cancelled their card were asked why they discontinued using their YourPlay card. The responses are summarised in Figure 13.17.

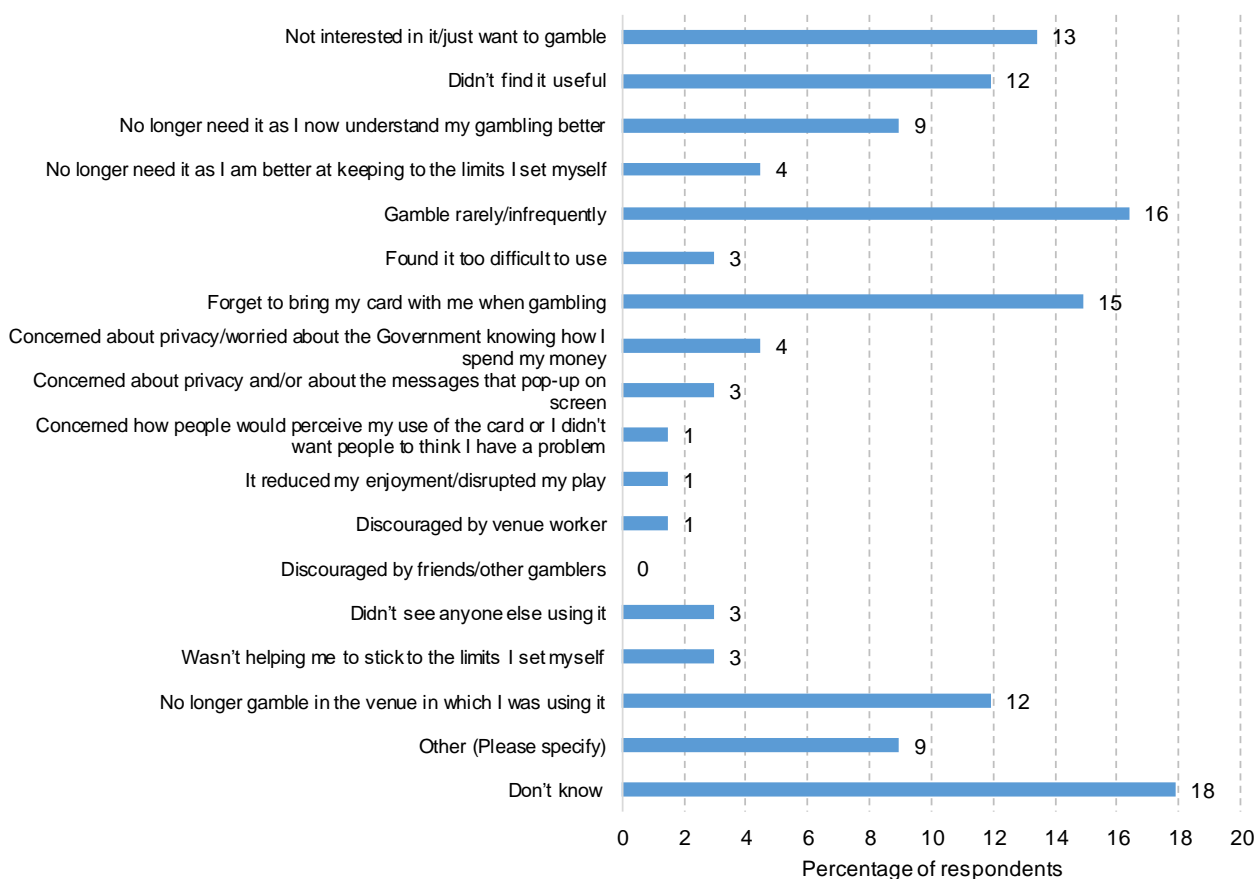
The most common reason for no longer using or cancelling the card was that individuals ‘gambled only rarely or infrequently’, with 16 per cent of those who no longer used or cancelled their card indicating this as a reason. Other common factors were that respondents: ‘forgot to bring my card with me when gambling (15 per cent), ‘not interested in the card or just want to gamble’ (13 per cent), ‘did not find the card useful’ (12 per cent), and ‘no longer gamble in the venue in which I was using it’ (12 per cent).

Concerns about privacy were not common amongst respondents, being raised by only 5 respondents. Four per cent of respondents reported concern about their privacy relating to the government knowing how much money they spend gambling as the reason why they no longer used their YourPlay card, with 3 per cent of respondents reported that concerns about privacy generated by the pop-up messages led them to stop using YourPlay.

One individual indicated that they were discouraged by a venue worker.

‘Other’ reasons were identified by 9 per cent of those who never used or cancelled their card. The reasons given were varied and included that they never received the card, had lost it, “I would use it every time if the staff knew how to log in to their system” and “no longer gamble using the unrestricted machines at Crown Casino”.

Figure 13.17 Reasons why respondents didn’t use or cancelled their YourPlay card, respondents could select more than one reason, per cent



n = 67 respondents (87 reasons were given in total as respondents could select more than one reason)
 Note: Results expressed as a proportion of those who no longer used or cancelled their card and as such will add up to more than 100 per cent.

14. Actual Venue Practices – Results of Mystery Shopping

14.1 Approach taken

Rationale for mystery shopping

Analysis of the underlying intervention logic of YourPlay has identified venue managers and staff as key intermediaries in facilitating (or frustrating) gamblers' use of YourPlay. The attitudes and behaviours of venue managers and staff will not, in themselves, enable YourPlay to achieve its objectives, however they are important because they are a potential key influencer of EGM gambler behaviour. Venue managers and staff have the potential to increase the impact of YourPlay if they increase awareness of it amongst their patrons, and foster positive attitudes and beliefs towards pre-commitment and expenditure monitoring amongst EGM gamblers, promote the use of YourPlay and make the process of joining and using YourPlay as seamless as possible. Alternatively if venue managers and staff hold incorrect beliefs about the operation of YourPlay or its targeted audience, or if they hold negative views about its use and effectiveness this could significantly reduce uptake and sustained use. Similarly if venue practices or venue technology makes YourPlay difficult to join, or difficult to use, then this is likely to significantly reduce uptake.

Within venues, venue based loyalty schemes that provided incentives for gambling spend were seen as a potentially fruitful channel to engage with gamblers, and to promote YourPlay to them. YourPlay was also seen as a potential offset to the increased risk from gambling that might arise from the introduction of loyalty schemes.

This central role of venues is reflected in the behaviours required in regulations, with the *Gambling Regulation 2014 (Pre-commitment and Loyalty Scheme)* requiring amongst other things that all venues display certain promotional materials about YourPlay in their venue, and that if a loyalty scheme is being offered in the venue that gamblers need to be offered YourPlay when they are joining the loyalty scheme.

However there have been conflicting reports about the effectiveness of venue's practices around YourPlay and their compliance with their legislative requirements. In consultations with venue managers and gaming room staff, self-reported compliance with the requirements of the relevant regulations is high. However, surveys of EGM gamblers paint a different picture. In the telephone based survey of EGM gamblers undertaken in 2016 as part of this evaluation all gamblers who reported being members of a venue based loyalty scheme were asked whether they were offered YourPlay by venue staff. Overall, 2 per cent of respondents said that a venue staff member offered them YourPlay when they signed up or renewed their loyalty card. The majority, 88 per cent reported that they were not offered YourPlay and 10 per cent of respondents answered "don't know".

In order to better understand how YourPlay was actually being experienced by gaming machine gamblers researchers sought to gain information about, and sign up to, YourPlay in a randomly selected group of hotels and clubs. In order to ensure the experience of the researchers reflected those of typical gamblers the research was not disclosed to venues or staff, however as this was a research rather than a compliance exercise all details of venues have been anonymised prior to analysis.

The objectives of the mystery shopping research were to address the following research questions:

- Do staff and management understand: the objectives, potential benefits, and obligations for supporting YourPlay?
- To what extent do venues meet their obligations in supporting and promoting the scheme?
- What practices and policies do they have in place above and beyond what is required?
- Do management and staff offer to sign up patrons to YourPlay?
- Do management and staff recommend YourPlay to existing loyalty scheme members?
- What are the gaps in knowledge and practice among staff and management in relation to YourPlay?
- What are the staff and management attitudinal barriers in relation to YourPlay?

In particular, given the broad agreement about the potential importance of loyalty schemes in promoting use of YourPlay, the extent to which behaviours of gaming room staff around sign up to loyalty programs meet the obligations set out in the regulations was a particular focus of the research.

Relevant regulations

The minimum requirements for venues in terms of advertising YourPlay, offering it to gamblers when they seek to join a loyalty scheme, and on the availability of YourPlay in venues are set out in the ***Gambling Regulation Act 2003*** and in the ***Gambling Regulation (Pre-commitment and Loyalty scheme) Regulations 2014***. The important elements from the point of view of the mystery shopping are the requirements around:

- Advertising in venues;
- Availability of YourPlay cards;
- The requirement to assist gamblers in accessing YourPlay;
- The requirement to offer YourPlay to those joining a venue based loyalty scheme; and
- The need to ensure the necessary equipment to use YourPlay is available for use in the venue.

Advertising of YourPlay in venues

Gambling Regulation (Pre-commitment and Loyalty scheme) Regulations 2014

Division 4—Information requirements

14 Pre-commitment information brochures

(1) At all times when gaming machines are available for gaming in an approved venue or casino, the venue operator or casino operator (as the case requires) must ensure that pre-commitment information brochures are available at—

- (a) each cashier area in the approved venue or casino; and
- (b) each player service point in the approved venue or casino; and
- (c) any other place in the approved venue or casino at which casual player cards are made available for players to collect.

Penalty: 20 penalty units.

(2) At all times when gaming machines are available for gaming in an approved venue or casino, the venue operator or casino operator (as the case requires) must ensure that the total number of pre-commitment information brochures available under subregulation (1) is equal to or greater than the number of gaming machines in the approved venue or casino (as the case requires).

Penalty: 20 penalty units.

(3) Nothing in this regulation prevents the provision or display of brochures containing information in languages other than English.

Offer of YourPlay to those joining loyalty schemes

Regulation 28 outlines the information that must be provided to players before a loyalty card is issued, at the time of enquiry and sign up, and Regulation 29 requires staff to provide all new loyalty members with a copy of the YourPlay brochure as part of their loyalty information pack.

Gambling Regulation (Pre-commitment and Loyalty scheme) Regulations 2014

28 Information required before issuing loyalty player cards

(2) A venue operator or a casino operator must, before issuing a loyalty player card to a loyalty scheme participant, inform the loyalty scheme participant that the loyalty player card can be linked to a registered player account or can be used as a casual player card.

Penalty: 20 penalty units.

(3) A venue operator or a casino operator must, before issuing a loyalty player card to a loyalty scheme participant, inform the loyalty scheme participant that the loyalty player card can be used to set a time limit or net loss limit or track their gaming machine play under the pre-commitment system.

Penalty: 20 penalty units.

(4) A venue operator or a casino operator must, before issuing a loyalty player card to a loyalty scheme participant, ask the loyalty scheme participant whether they wish to use the loyalty player card to set a time limit or net loss limit or track their gaming machine play under the pre-commitment system.

Penalty: 20 penalty units.

(5) A loyalty scheme provider must not encourage or induce a person to obtain a casual player card rather than a registered player card.

Penalty: 20 penalty units.

(6) A loyalty scheme provider must not draw attention to a person because that person is using or has used the pre-commitment system.

Penalty: 20 penalty units.

(7) A loyalty scheme provider must not require a person to participate in a loyalty scheme in order to use or access the pre-commitment system.

Penalty: 20 penalty units.

29 Information to be given to loyalty scheme participants

For the purposes of section 3.5.36A(1) of the Act, the prescribed information is —

(a) the information specified in the player information standards for brochures relating to the pre-commitment system;

Availability of YourPlay in venues

The requirements around the physical availability of YourPlay in venues including function cards and card readers is set out in the *Gambling Regulation Act 2003*.

Gambling Regulation Act 2003

3.8A.7 Certificates of installation—player account equipment and parts of a pre-commitment system

- (1) In this section— relevant licensee means a person who holds—
 - (a) a gaming industry employee's licence; or
 - (b) a licence issued under Part 4 of the Casino Control Act 1991.
- (2) A relevant licensee who installs player account equipment or a part of a pre-commitment system on or in a gaming machine must—
 - (a) certify, in a form approved by the Commission, that the part or equipment is functioning in the manner in which it is designed and programmed to function; and
 - (b) retain the certificate for a period of 12 months immediately following the date of signature.

(3) A relevant licensee must not sign a certificate referred to in subsection (2) knowing it to be false.

Penalty: 100 penalty units.

- (4) On and after 1 December 2015, a venue operator or casino operator must not allow gaming to commence on a gaming machine in respect of which certificates under subsection (2)—
 - (a) have not been signed; or
 - (b) have been signed in contravention of subsection (3).

Penalty: 1000 penalty units.

3.8A.12 Operators must ensure functioning of player account equipment and connection to precommitment system

- (1) On and after 1 December 2015, a venue operator must, as far as is reasonably practical, ensure that the player account equipment installed in the approved venue is functioning in the manner in which it is designed and programmed to function—
 - (a) in the case of equipment that is installed on or in a gaming machine, at all times that the gaming machine is available for gaming in the approved venue; or
 - (b) in any other case, at all times that any gaming machine is available for gaming in the approved venue.

Penalty: 120 penalty units.

(2) On and after 1 December 2015, a venue operator must, as far as is reasonably practical, ensure that any gaming machine that is available for gaming in the approved venue is capable of applying a time limit or net loss limit set under the precommitment system.

Penalty: 120 penalty units.

- (3) On and after 1 December 2015, a casino operator must, as far as is reasonably practical, ensure that the player account equipment installed in the casino is functioning in the manner in which it is designed and programmed to function—
 - (a) in the case of equipment that is installed on or in a gaming machine, at all times that the gaming machine is available for gaming in the casino; or
 - (b) in any other case, at all times that any gaming machine is available for gaming in the casino.

Penalty: 120 penalty units

(4) On and after 1 December 2015, a casino operator must, as far as is reasonably practical, ensure that any gaming machine that is available for gaming in the casino is capable of applying a time limit or net loss limit set under the pre-commitment system.

Penalty: 120 penalty units.

Methodology

The project was carried out in compliance with ISO 20252 and membership requirements for AMSRO and AMSRS.

The research obtained ethics approval from The University of Adelaide Human Research Ethics Committee (H-2018-085). An important condition of the ethics approval was to strictly maintain the anonymity of all venues visited as part of the research. The names of the selected venues was not disclosed to the Department of Justice and Community Safety, and the analysis of the dataset was undertaken by the University of Adelaide and ORC International after potentially identifying details had been removed. This means that certain types of analysis could not be undertaken on the dataset, for example the analysis dataset does not include a venue's council region, or its YourPlay use intensity as in many cases these variables would make the venue potentially re-identifiable.

Venues selected

A total of n=161 mystery shopping visits were undertaken in 80 venues; 50 venues in metropolitan area and 30 in regional areas. Each venue was visited by two different researchers,¹⁹ with the researchers travelling in pairs as a risk management strategy. Where possible researchers entered the venues at different times (typically 20 minutes apart). For venues that were located within close proximity to each other (i.e. inner metro), the researchers went on the same day but visited the venue separately.

The selection of the sample frame was a two stage process with an initial selection of 'higher use' venues. Twenty six venues with higher use of YourPlay²⁰ were selected randomly within stratas to ensure the split between hotels and clubs was broadly reflective of the overall shares of venues and so that inner metropolitan, outer metropolitan and regional venues were all represented in the sample. Regional areas more than 3 hours' drive from the Melbourne CBD were excluded from the sample frame for logistical reasons, as were venues located in the Shire of Cardinia and the City of Casey in Outer Metropolitan Melbourne. Once the higher use venues were selected, 54 low use venues were randomly selected within the council regions of the 26 higher use venues selected in the first step. The distribution of the selected venues and visits by broad region and by venue type is shown in Table 14.1.

Table 14.1 Sample selected for mystery shopping

Region	Total Venues	Total Visits	Club Visits	Hotel Visits
Metro Inner	26	53	19	34
Metro Outer	24	48	18	30
Regional	30	60	40	20
Total	80	161	77	84

An overview of the venue characteristics is shown in Figure 14.1.

Throughout the analysis statistical tests have been carried out (t tests, using the 95 per cent confidence interval) to identify any statistically significant differences between the following key analysis variables:

- Venue type: club (48 per cent) or hotel (52 per cent)
- Venue location: inner metro (33 per cent), outer metro (30 per cent) or regional (37 per cent)
- Venue size: small (17 per cent), medium (36 per cent) or large (47 per cent)
- Venue has a loyalty program (73 per cent) or not (27 per cent)
- Relative use of YourPlay: higher (32 per cent) or lower (68 per cent)²¹

The results presented are based on the mystery shops conducted (n=161) or as noted in each section. To protect the anonymity of venues, results from the mystery shopping are reported at aggregate level only.

Some parts of the analysis may not add up to 100 per cent due to rounding.

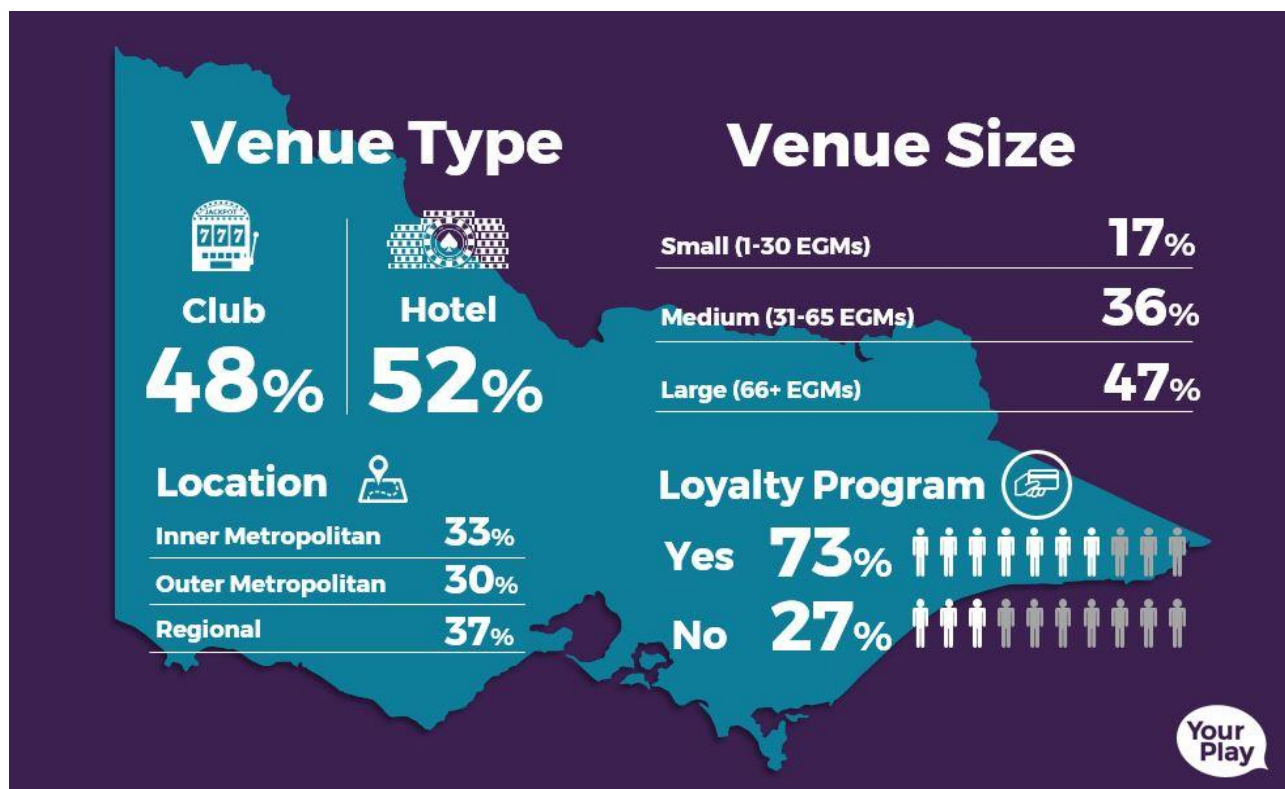
The Melbourne Casino was excluded from the mystery shopping as, given it is the only venue of its type in Victoria, it would not have been possible to anonymise it in the reporting of results.

¹⁹ One venue was visited by 3 researchers.

²⁰ For the purposes of this research 'higher use' venues were defined as those venues with more than 0.15 per cent of their turnover spent by gamblers using a YourPlay card an intensity that was observed in 65 of the 495 Victorian hotels and clubs which had active gaming machine entitlements in March 2018. As such selecting 26 higher use venues substantially oversamples them relative to their overall prevalence amongst EGM venues as the overall prevalence is 13 per cent of venues whereas 31.5 per cent of venues selected for the mystery shopping visits were higher use.

²¹ If the venue's turnover on YourPlay cards was greater than 0.15%, they were defined as a higher use and if under 0.15%, they were defined as lower use.

Figure 14.1 Overview of venues visited



Mystery shopping visits

All of the mystery shopping visits were based around the researcher attempting to obtain a YourPlay card with specific spending and time limits set, and then testing that card in the venue to ensure the correct limit had been set. Researchers sought to present themselves as typical patrons to test the actual experiences of those seeking to join YourPlay, and as such did not disclose that they were undertaking research.

In the qualitative research undertaken with venue managers and staff at earlier stages of the evaluation a widely expressed view was that sign-ups for YourPlay typically occurred through venue loyalty schemes. As such, where possible the researchers sought to replicate this by initially enquiring with staff about the loyalty scheme (if the venue had one) and then asking about joining YourPlay, or having an existing YourPlay account linked to the loyalty card. However this approach was not feasible in many cases as, for example, once a researcher had joined a venue based loyalty system they could not subsequently join it at another venue using the same system and as such many of the visits targeted joining YourPlay through a casual user account.

Regardless of the specific target for the visit they all followed the same broad pattern to the extent it was feasible.

A typical mystery shop is summarised below:

- Look out for YourPlay material in venue
- If the venue has a loyalty program, ask to join. If the venue does not have a loyalty scheme begin a conversation with staff around gaming to allow YourPlay to be offered.
- If YourPlay is not offered ask a question about it, ideally referring to visible promotional material as the supposed prompt for the question.
- Ask questions about YourPlay such as 'What is it?', 'How does it work?', 'What do I get?', 'How do I join?'
- Register for YourPlay or obtain a casual user card.
- Ask the venue worker to set a money limit of \$200 and time limit of 3 hours per week.
- Test the card at the YourPlay kiosk in the venue to check if the card works, and if the requested limit has been set. If the card does not work in the kiosk researchers sought to check it at an EGM where possible.
- Exit the venue and complete the checklist as soon as possible after each visit.

Researchers used a checklist to mark off what extent each venue had met each criteria. This checklist was drafted by the South Australian Centre for Economic Studies (SACES) and ORC International. The checklist was not used during the mystery shopping visits, researchers completed this after their encounter.

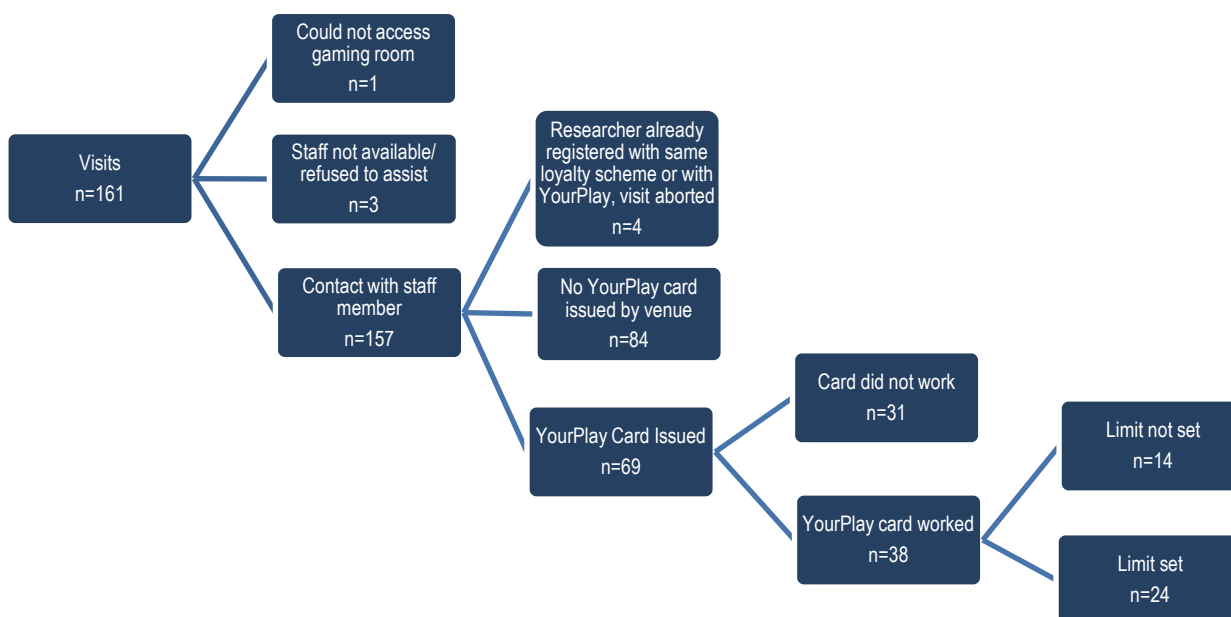
The mystery shopping schedule was drafted by ORC. The schedule needed to take into account the mystery shopper’s availability, venue’s loyalty programs, venue locations and time required to cancel YourPlay registrations before they can sign up again (which takes 24 hours). Based on these factors, ORC aimed to achieve the following pattern of sign-up targets through the visits.

Table 14.2 Mystery shop targets

	Target numbers (n=)
Sign up to loyalty and a registered YourPlay account	38
Sign up to loyalty and linking it to an existing YourPlay account	19
Sign up to loyalty and joining YourPlay through a casual user account	10
Joining a registered YourPlay account only	2
Joining through a casual player card only	92
Total	161

Figure 14.2 shows the progress through the mystery shopping exercise, illustrating the effective sample size of various elements of the assessment. Of particular note in interpreting the following discussions, the researchers were able to access staff on 157 of the 161 visits, and there were 69 visits in which the researchers were able to access a YourPlay card.

Figure 14.2 Overview of progress within the visits



Limitations

There are a number of potential limitations and risks that face a mystery shopping exercise. The discussion of staff attitudes, staff competence and reasons for unsuccessful visits are likely subject to some degree of subjectivity and unlike the coding of an interview transcript is to not possible for most questions to have multiple researchers code the responses, instead the analysis is largely reliant on the way in which the individual researcher in the venue coded the question. A degree of cross checking has been introduced by reviewing the answers researchers gave to descriptive questions, and where two analysts at SACES and ORC International agreed that the free text answers indicated that a question answer should be recoded then this was done prior to the analysis. This subjectivity (and the recoding) does not, however, impact on the overall assessment of outcomes as they are not subjective but verifiable.

It is important to note that, given only two visits were undertaken to each venue, usually close together in time, the findings would not necessarily be a reliable indicator of the average performance of any individual venue, and they are not intended as such. For example, it might be that the researchers happened to visit during a particularly busy period, or when a staff member who was less familiar with YourPlay was working. However the overall sample size of 161 visits was in most cases sufficient to distinguish statistically significant differences between key variables such as venue type and broad location. And visits were distributed widely across all seven days of the week and with start times that ranged from 9AM to 6PM.

The one area in which the sample size is a potential problem is in identifying the extent to which venues with greater current intensity of use of YourPlay perform better along the various metrics. The sample size, combined with the requirement to ensure that venues confidentiality was protected meant that higher use venues were treated as a single category. Under this treatment no statistically significant differences were identified in their relative performance. It could be that if the sample size for these higher use venues was greater, then it would be possible to identify difference in relative performance (although this would require a much greater sample size as this type of venue is already over-represented in the sample frame). Alternatively it could be that the broad category of 'higher use venues' which at the state-wide level ranges from 0.16 per cent of turnover to 11.5 per cent of turnover would have been better represented as either several sub-categories, or as a continuous variable, just including the specific YourPlay intensity of each venue as a variable in the analysis. The former options would have required a much larger sample size, and the latter was precluded due to the conditions imposed as part of the ethics approval, as many venues could have been re-identified in the analysis dataset if their YourPlay intensity was included as this value is unique in the dataset in many instances. Given these limitations it certainly cannot be ruled out that our analysis does not fully capture differences in performance of staff attitude/aptitude between higher use and low use venues.

It should also be noted that venues located more than 3 hours from the Melbourne CBD were excluded from our sample frame as were venues located in the outer metropolitan local government areas of the Shire of Cardinia and the City of Casey. To the extent that the 73 venues located in more remote areas of Victoria systematically differ from the performance of the 82 regional venues that were included in our sample frame then our analysis may overstate or understate the relative performance of this type of venue. Similarly, if the 18 venues located in Cardinia and Casey systematically differed from those in the 129 venues classified as being in Outer Metropolitan Melbourne and included in our sample frame, then our analysis may overstate or understate the relative performance of this type of venue.

There were also a small number of cases of human error which reduced the sample size for a few questions as one or more researcher did not record the answer for that specific question from a particular visit (researchers recorded their experiences after exiting the venue). There were also four visits on which it was not possible for outcomes to be assessed which were not related to the venue. One visit was excluded because the YourPlay helpline had not processed a cancellation request, and when they went to join at a venue they found they were already registered. Three visits were excluded as the loyalty program data we held was incorrect and the researchers were inadvertently tasked with attempting a sign-up to loyalty and a registered YourPlay account when they were already members of that loyalty program from an earlier shopping visit. In terms of assessing outcomes a reduction in sample size from 161 visits to 157 visits is not material and will not have any significant impact on either the overall outcome or on the relative performance by venue type or location.

It is also possible that sign-up rates could have been increased through protocols that focussed on maximising sign-ups, for example if researchers had acceded to requests for full identity checks including proof of address when seeking to join through a casual user card (even though no ID is required for this form of sign-up according to the relevant regulations), or if the researchers had attempted multiple visits to each venue after the first visit was unsuccessful. However the objective of the research was not to attempt to maximise sign-up rates but rather to explore what experiences Victorian gamblers would have when seeking to secure a YourPlay card in a variety of ways, including anonymously. We believe the research design does accurately capture those experiences.

Finally, there is the risk that the way in which the researchers presented themselves seemed inauthentic to venue staff, potentially leading to them delivering better quality service as they felt their performance was being assessed. To the extent that this risk was actually realised (and we are aware of one venue which suspected that research was taking place) then it would tend to lead to the research **overstating** the actual level of performance.

14.2 Promotion of YourPlay

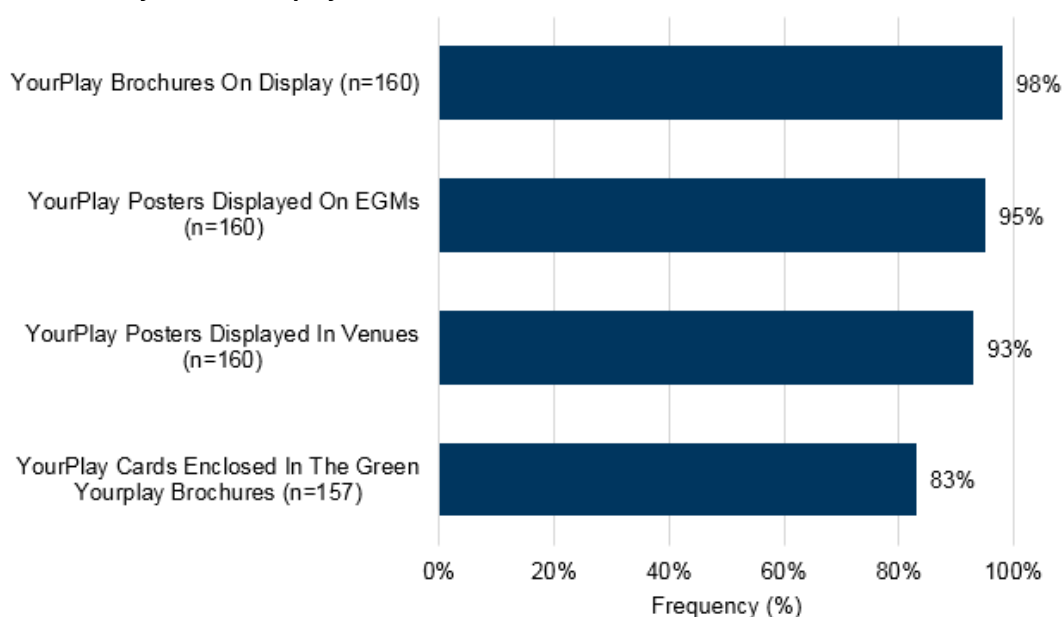
Advertising of YourPlay

The Department provided venues with material to support its implementation. YourPlay advertising material available to venues includes: A2 posters to be displayed in venues, A5 posters to be displayed on EGMs, YourPlay brochures to be on display and YourPlay cards enclosed in green YourPlay brochures.

Researchers were tasked to observe the type of YourPlay materials displayed by venues to ensure that they were meeting their obligations. On one visit the researcher could not obtain access to the gaming room and so the sample size for this assessment of in-venue advertising is n=160 unless otherwise noted. The mystery shopping found that nearly all venues displayed the purple YourPlay brochures (98 per cent), YourPlay posters on EGMS (95 per cent), and YourPlay posters on walls (93 per cent). Less common were the green YourPlay brochures, enclosing the YourPlay cards (83 per cent). There were no venues in which **none** of the four types of marketing material were sighted by the mystery shopper, but there were seven visits (out of 160²²) in which only two of the four were sighted.

The type of YourPlay materials displayed by venues is shown in Figure 14.3.

Figure 14.3 YourPlay material displayed



Note: n=157 not 160 for 'YourPlay cards enclosed in the Green YourPlay brochures' as three researchers did not complete this item on the check list.

Statistically significant differences in display of YourPlay materials were:

- Venues with a loyalty program were more likely than venues without a loyalty program to have YourPlay brochures on display (99 per cent compared with 93 per cent).
- Hotels (99 per cent) were more likely than clubs (91 per cent) to display YourPlay posters on EGMs.
- Venues located in inner metro areas were more likely than regional venues (100 per cent compared with 88 per cent) to display YourPlay posters on EGMs.

The majority of venues (71 per cent) displayed all four types advertising materials in their venue. Large venues were more likely to display all four advertising materials (80 per cent) compared with 69 per cent in medium sized and 54 per cent in small venues.

Venues located in regional areas were less likely to display all four types of advertising material (62 per cent, compared with 71 per cent overall).

In addition to the YourPlay advertising displayed in the gaming areas, researchers also on occasion noticed large banners in front of the gaming room or building (n=6) and YourPlay posters in the bathrooms (n=5).

²² In one of the 161 visits the researcher was not able to access the gaming room due to a requirement to register for loyalty first with stringent ID requirements.

Offer of YourPlay

Having completed an initial visual review of the venue, researchers were tasked with observing whether venue staff mentioned YourPlay without being prompted during their initial interaction. As with the analysis of advertising the sample size for this assessment is 160.

Of all the venues visited (that is venues with a loyalty program or not), 14 per cent offered YourPlay to researchers without being prompted; in other words the majority (76 per cent) of staff did not. A further 9 per cent of responses were left unanswered either because staff had been unhelpful or unavailable to tend to the mystery shopper at the time.

As discussed in the methodology, researchers were instructed to use the loyalty scheme as a pathway to register for YourPlay where possible in order to make the mystery shopping visit appear more typical. However, as note in the methodology, it was not possible for a researcher to join a specific loyalty scheme more than once and so not all visits to the venues with a loyalty scheme (73 per cent of the total) could ask to join the scheme.

This focus on sign up through loyalty scheme's had an additional purpose. It is a legal requirement for venues to promote YourPlay to all of those joining a venue based loyalty scheme which allows the collection of loyalty points on gaming machine spending, and so by making the initial enquiry about the loyalty scheme the researchers were able to assess the degree of compliance with these regulations.

The results presented below relate only to venues with a loyalty program where the targeted sign-up was to join the venue's loyalty scheme and join YourPlay through the loyalty sign-up interaction, either by creating a new registered YourPlay account at the same time as they joined a loyalty scheme, by linking a casual user YourPlay account to a loyalty card, or by linking an existing YourPlay account to the venues loyalty scheme. In total 68 of the mystery shopping visits were targeted around joining a loyalty scheme as a path to accessing YourPlay.

Venue staff offered YourPlay after a request to join the venue's loyalty program without a prompt or query from the researcher in 31 per cent of visits where this approach to sign up was being taken (significantly higher than the rate for non-loyalty initial conversations, but still low considering making such an offer is a legal requirement). In a number of these cases YourPlay was offered via a consent tick box on the loyalty program application form rather than verbally offered by staff. When the shopper ticked the box, staff took the approach of verbally confirming whether researchers wanted YourPlay.

In 65 per cent of visits joining through a loyalty program the venue staff did not offer YourPlay unprompted at all during the loyalty sign-up process, only mentioning it in response to a specific query from the researcher. In the remainder 4 per cent of visits the offer of YourPlay could not be tested as staff declined to engage with the researcher.

There were no key differences of note by venue type, location, size and relative use of YourPlay in determining the likelihood that YourPlay would be offered unprompted.

Recommendation 21: Ensure communications to venues and training of workers emphasises requirement to offer YourPlay when a gambler joins a loyalty program, and audit loyalty materials in venues to make sure they promote YourPlay.

Explanation of YourPlay by venue staff

Researchers were assigned to instigate conversation surrounding YourPlay with venue staff whether or not it had been offered by the staff member. If the venue had a loyalty program and staff did not offer YourPlay when the shopper asked to join (or it was not explained), researchers were tasked to ask 'What is YourPlay?' during the loyalty sign up process. For venues without a loyalty program, researchers asked about YourPlay after the interaction had occurred for long enough that they did not feel the staff member was likely to introduce the topic themselves. The sample size for these observations is 157 visits (due to the four cases where no meaningful contact with venue staff occurred) unless otherwise noted for a specific question.

Specifically, researchers were tasked to observe the quality of the explanation offered by venue staff in terms of what YourPlay is and what it's used for, their overall opinions of the scheme (whether staff were positive, negative or neutral about it), and the extent to which they addressed YourPlay's numerous features. They were also tasked with observing whether there were any negative predispositions towards YourPlay as well as the overall level of confidence, encouragement and depth of the explanation.

Explanation of YourPlay

Just over three quarters (79 per cent) of all venues visited were able to explain what YourPlay is to researchers when they asked, while 15 per cent were not able to, and 4 per cent of researchers did not complete this question on the checklist. There were no key differences found in the quality of explanation by venue type, location and size and relative use of YourPlay.

Based on researchers' overall observations, it was common for one staff member to begin explaining YourPlay and, either refer researchers to their manager, or have their manager voluntarily step in to provide a more adequate explanation.

Amongst the staff that didn't explain YourPlay to a high standard (i.e. who did not address core features of the scheme and the way it works), they advised that it had been a long time since they had been trained (two years). Meanwhile other staff merely stated "it's to track your time and spend on the machines," without listing any of the other benefits.

Researchers' approach in ascertaining staff member's attitudes towards YourPlay was that they either waited for the staff member to express their opinion; or, if there was no obvious positive or negative standpoint presented by the staff member, they directly asked staff what they thought of the scheme. Of the resulting observations, 29 per cent found that staff members expressed a positive opinion, while 55 per cent were neutral and 17 per cent were negative about the scheme.

When staff were neutral it was because they were non-committal or merely factual in their interaction with researchers. The negative expressions around YourPlay consisted of sentiments like: "you don't *need* it", "no one ever asks for/uses it", with one staff member saying "to be honest you can take the card out anyway." One mystery shopper said that she was interested in finding out more about a casual card for her uncle, in which case the staff responded sceptically "but do you think he'll use it?"

YourPlay Features

Researchers were tasked to observe and record which YourPlay features were mentioned by venue staff. The sample size for this part of the visit is 157 unless otherwise noted.

The checklist covered the following features:

- YourPlay is intended for everyone who uses EGMs (i.e. they don't recommend it for certain players);
- YourPlay keeps you informed about the time and money you spend gambling on EGMs;
- You can use a casual YourPlay card or register your YourPlay card;
- You can set time and money limits on YourPlay, if you wish;
- You will receive annual activity statements letting you know how much time and money you have spent;
- You can use your YourPlay card in any venue that has EGMs in Victoria (i.e. you don't need a new card for each venue);
- You can access your YourPlay account to view your playing history, make changes to limits and updates to information (need to know your Username and set a password to do this); and
- You can add the same YourPlay account to as many loyalty cards as you want.

The mean number of features mentioned was 4. The features mentioned by more than four in five staff were 'YourPlay keeps you informed about the time and money you spend gambling on EGMs' (90 per cent) and 'You can set time and money limits on YourPlay, if you wish' (86 per cent). The feature that was least mentioned was 'You can add the same YourPlay account to as many loyalty cards as you want' (13 per cent).

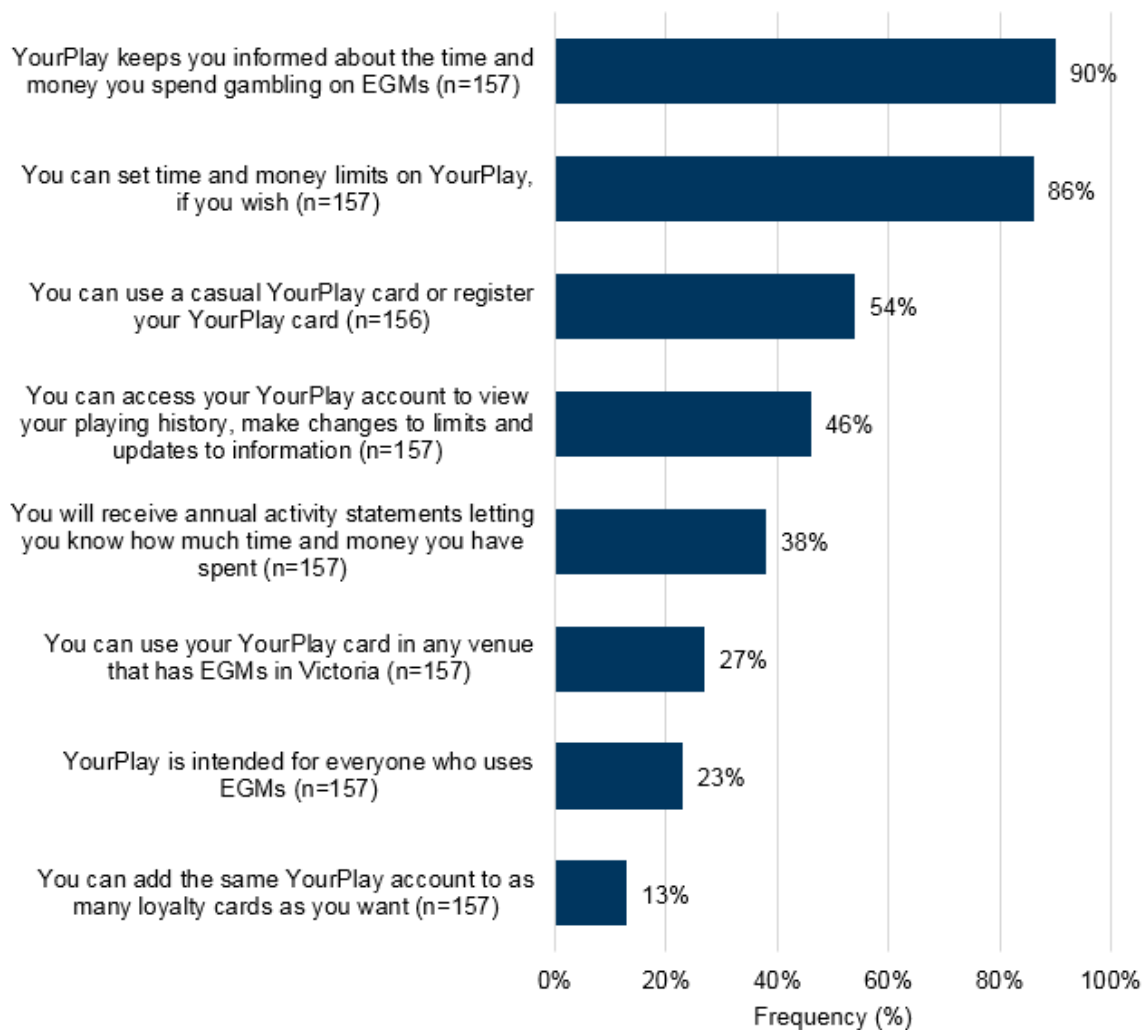
Figure 14.4 summarises the features and how often they were mentioned across interactions with the researchers.

In terms of key differences:

- Regional venues were less likely to mention 'YourPlay keeps you informed about the time and money you spend gambling on EGMs' (82 per cent compared with 90 per cent overall).
- Regional venues (96 per cent) or venues with a loyalty program (91 per cent) were more likely to mention 'You can set time and money limits on YourPlay, if you wish'.
- Venues located in outer metro areas were more likely to mention 'You can use a casual YourPlay card or register your YourPlay card' (70 per cent compared with 54 per cent overall).

- Venues located in inner metro areas were less likely to mention ‘You will receive annual activity statements letting you know how much time and money you have spent’ (21% compared with 38% overall).
- Regional venues (61 per cent) were more likely than venues located in inner metro areas (28 per cent) to mention ‘You can access your YourPlay account to view your playing history, make changes to limits and updates to information’.
- Venues with a loyalty program (51 per cent) were also more likely than venues without (33 per cent) to say ‘You can access your YourPlay account to view your playing history, make changes to limits and updates to information’.

Figure 14.4 Proportion of visits in which key YourPlay features were mentioned by staff, per cent



Note: n=156 not 157 for ‘You can use a casual YourPlay card or register your YourPlay card’ because the researcher did not complete this item on the check list for one visit.

Negative comments about YourPlay

When researchers asked staff about YourPlay, they were also tasked to observe whether or not staff made any negative comments about YourPlay, specifically:

- If staff mentioned it was only for those who have a ‘gambling problem’;
- That YourPlay is not a useful scheme to use;
- The use of YourPlay is uncommon; or
- That the shopper didn’t need it.

In total, at least one negative comment was made by a staff member in 46 of the 157 venues in which the researchers were able to interact with a staff member (or 29 per cent of those visits). In four cases, three or more different types of negative comment about YourPlay were made to the researcher during the visit.

Where totals do not add up to 100 per cent for the specific types of negative comment discussed in the remainder of this section this is because the researcher did not record yes or no for this question.

A minority of interactions involved the staff (6 per cent) mentioning that “it is only for those who have a gambling problem”. Hotels (10 per cent) were more likely than clubs (1 per cent) to make this type of comment. Venues located in inner metro areas were also more likely to say that the scheme was “only for those who have a gambling problem” (13 per cent, compared with 6 per cent overall).

Six per cent of staff members mentioned that YourPlay ‘is not a useful scheme to use’ and that a loyalty scheme was better. Hotels (10 per cent) were more likely than clubs (1 per cent) to mention this.

Nearly one in five (17 per cent) staff members said ‘that the use of YourPlay is uncommon’ while the majority did not (80 per cent). There were no key differences by venue type, location, size and relative use of YourPlay.

Seven per cent of venue staff told the shopper ‘you don’t need it’. Hotels (12 per cent) were more likely than clubs (3 per cent) to say ‘you don’t need it’. Also, regional venues were less likely to say this (2 per cent). Nine in ten staff (89 per cent) did not mention this.

Overall experience

Researchers were asked to rate their overall experience, specifically:

- How confident the staff member appeared when they explained YourPlay;
- How well YourPlay was explained; and
- How encouraging staff were about signing the shopper up.

Overall, researchers rated sixty per cent of staff members as being confident in what they were saying about YourPlay. Just over one third of staff (37 per cent) were rated by the researcher as not confident and 3 per cent was of the researchers did not complete this item on the checklist.

In terms of how well YourPlay was explained, 27 per cent of researchers said ‘excellent’, 35 per cent said ‘acceptable’ and 37 per cent felt it was ‘poorly’ explained to them. Venues located in inner metro areas were more likely to be rated as ‘poor’ in explaining YourPlay (55 per cent, compared with 37 per cent overall).

In relation to how encouraging venue staff were about sign up, just over one quarter (27 per cent) of researchers felt that they were ‘very’ encouraging, 32 per cent felt it was ‘average’ and 39 per cent thought staff were ‘not at all’ encouraging. Venues located in inner metro areas were more likely to be rated ‘not at all’ encouraging (57 per cent, compared with 39 per cent overall).

14.3 The sign-up process of YourPlay

Staff attitude

Researchers who felt comfortable providing the details requested by staff (the type of information requested by staff for sign up did vary by venues; if venues were requesting more detailed ID than the shopper was comfortable providing they were encouraged to explore alternatives such as anonymous accounts, but could cease the visit if the venue would not accept these alternatives) proceeded with the YourPlay registration. Researchers were tasked to observe if staff did the following:

- Expressed surprise that they are joining;
- Discouraged them from joining; and
- Found the YourPlay card easily.

Five of the mystery shopping visits ceased at this point as staff required proof of address and identity for YourPlay from researchers who did not wish to provide them and would not accept an anonymous sign up to YourPlay (e.g. a casual user card). As such the sample size for this chapter is 152 unless otherwise noted.

One in ten staff (11 per cent) seemed surprised when the mystery shopper asked to register for YourPlay. Hotels (19 per cent) were more likely than clubs (3 per cent), and venues located in inner metro areas (23 per cent) were more likely than regional venues (2 per cent) to express surprise. Anecdotally, some researchers said that a few staff expressed surprise at being asked twice in the same day about YourPlay. Other staff members showed little surprise and were matter of fact in their approach to the sign up, dealing with it systematically.

Just over one in ten (12 per cent) staff tried to discourage the mystery shopper from joining YourPlay, with a few saying that their “rewards program was better.” Venues located in inner metro areas were more likely to discourage the shopper from joining YourPlay (21 per cent, compared with 12 per cent overall).

Three quarters (75 per cent) of staff found the YourPlay card easily. Venues located in outer metro areas (88 per cent) were more likely to find the YourPlay card easily compared with regional venues (60 per cent). Nearly one in five staff (17 per cent) could not find the YourPlay card easily. Researchers noted in some instances, brochures were empty i.e. no casual card in YourPlay brochure. The remaining 8 per cent of visits where the ease with which staff could locate a card was not rated were visits that did not progress to the point where a card was being provided, e.g. where staff members actively discouraged joining, where staff reported that the system was down and so on.

While one venue didn't bother discussing YourPlay at all, researchers noted that there were staff at other venues who were visibly trying to be helpful but were merely left frustrated when YourPlay didn't work. It was common for staff to admit it had been a while since being trained and this resulted in their uncertainty over the sign up process and being able to assist. One staff member advised that a YourPlay consultant was coming to the venue and suggested the shopper drop by on that day to ensure they could be successfully signed up then. Meanwhile another venue suggested a shopper join their program (and consequently YourPlay) in July due to better offers, thus not giving the shopper a YourPlay card. A few venues also expressed the view that the government are tracking or monitoring the time and spend through YourPlay. Furthermore staff were unaware to verbally differentiate between the fact that while YourPlay is a government initiative, the government did not actually collect information identifiable to any individual, which highlights yet again a need for further staff training.

Sign up process in more detail

Researchers were tasked to observe how staff went about the sign up process, specifically if staff were able to:

- Do it straight away or told the shopper to come back;
- Complete it alone or with assistance; or
- Complete it from memory, or used a manual or other support material.

The average interaction time for the sign up process varied across venues. Staff members often did not spend more than 2-3 minutes explaining the benefits of YourPlay, and some staff had a very brief explanation that may have lasted only a few seconds. This is in contrast to staff talking about the benefits of their loyalty program, which seemed to be spoken of with more confidence and which staff tended to spend more time speaking about. One staff member went to demonstrate the loyalty card at the kiosk once the shopper had signed up, and told the shopper “*A/ways* press this button (Loyalty program name) and *never* this button (YourPlay).” In most cases, staff were able to sign up the mystery shopper ‘straight away’ (42 per cent), while 22 per cent asked the shopper to ‘come back’. For the remainder (36 per cent), this was left unanswered as cards didn't work or were to be mailed out (as they had signed up for loyalty).

Staff were able to complete the sign up process ‘alone’ 39 per cent of the time, with 14 per cent requiring assistance from others at the venue. In terms of key differences, venues located in outer metro areas were more likely to complete the process ‘alone’ (53 per cent, compared with 39 per cent overall). Venues located in inner metro areas were more likely to require ‘assistance’ (24 per cent, compared with 14 per cent overall). Unfortunately, issues with the venue systems reported as being down, equipment reported as not working, staff refusals, or policies that loyalty cards were mailed out meant that researchers were not able to observe this process in a plurality of cases (47 per cent were left unanswered). This was more likely to occur in regional venues (64 per cent, compared with 47 per cent overall).

There were a wide range of reasons why many visits were unsuccessful at this stage and a YourPlay card was not obtained. There were a number of visits in which staff tried multiple cards without success, presumably as they had either expired or weren't activated, nor did they know how to go about activating the cards. One venue took the initiative to contact YourPlay after the casual cards didn't work and found that they expire after two years, the others were not reported to have taken any action to follow up on the cause.

Some venues believed that a form of ID was required to use a casual player card. There were also cases where casual cards were also not activated and therefore didn't work when inserted into the EGMs, leaving some staff baffled as to why they were not working. Many times staff directed researchers online as the “system was down” and thus they were unable to complete the registration. Some staff advised they mailed their loyalty cards out or needed to pick the cards up at a later date, so they weren't able to demonstrate how to set limits or check the card. In one case, the loyalty card that was mailed out to the mystery shopper was addressed to the correct address but incorrect name²³.

²³ The name was completely different to our mystery shopper. It was addressed to a male and the mystery shopper was female.

Overall, 15 per cent of the visits where a sign-up could have been achieved (e.g. excluding the 3 visits that failed as there was overlap in loyalty schemes and the 1 visit that failed as YourPlay had not cancelled, n=157) failed without a YourPlay card being issued because excess ID was required by the venue; 10 per cent failed without a card being issued due to the staff member reporting that the YourPlay system was down or the venue's internet connection was down; 11 per cent failed because staff members were busy or refused to assist; and 5 per cent failed due to lack of staff knowledge.

Setting limits

Once a YourPlay card had been supplied researchers were tasked to observe if staff suggested a limit and if staff stated a 'normal' limit, and then to request that the staff member set an expenditure limit of \$200 per week and a time limit of 3 hours per week. Researchers then needed to observe if staff were able to do the following:

- Explain how you can set and change your own limits either at the kiosk or online;
- Explain that you can check and update your own limits either at the kiosk or online; or
- Explain that a username and password are needed to access your account online outside of the venue.

This discussion only relates to the 69 visits in which a YourPlay card had been obtained from the venue.

Overall, ninety per cent of staff did not suggest a limit, 9 per cent of staff told the shopper to determine their own limit, 1 per cent (n=1) suggested a specific limit. For the one staff member who suggested a limit, they said \$50 as an example.

It is worth mentioning that staff members who offered demonstrations on how to use a YourPlay card (especially a casual player card), more often found they didn't work upon putting them straight into the EGM. However, when they did work, staff didn't know how to set the limits or if limits even applied to casual card use. Those that were knowledgeable and successful in demonstrating YourPlay's functions knew to accompany researchers to the kiosks.

Overall, 72 per cent of staff explained how you can set and change your own limits at the kiosk or online whereas 28 per cent of staff did not. Venues located in inner metro areas (60 per cent) were less likely to explain how you can set and change your limits compared with the average (72 per cent).

Fifty nine per cent of staff said that you can check and update your account at the kiosk or online. Venues in inner metro areas were much less likely to tell the researchers this (40 per cent compared to the average of 59 per cent), and venues in regional areas were much more likely to point this feature out (83 per cent).

Slightly less than half of venue staff (48 per cent) told the researcher that they would need a username and password to access their account. Venues located in inner metro areas were significantly less likely to tell the researchers this (24 per cent compared to the average of 48 per cent) whereas staff in regional venues were significantly more likely to tell the researcher (72 per cent).

Checking the YourPlay card

Once researchers registered for YourPlay, they needed to check if the card they were issued was set up properly and if they worked. As was the case with the previous section, this analysis relates to the 69 mystery shopping visits on which a YourPlay card was able to be obtained.

When researchers inserted the YourPlay card into the machine to check if it worked, in 55 per cent of cases the card worked, in 45 per cent of cases the card did not work.

If the card worked, researchers then checked if the staff member set the limits that had been requested, in 24 of the 38 cases where the card worked in the venue the requested limit had been set (e.g. in 63 per cent of cases).

As mentioned previously, the majority of the visits had been unsuccessful before this point. Expressed in terms of the total number of visits on which success in obtaining a card could be assessed (n=157) a YourPlay card was obtained in 44 per cent of visits, in 24 per cent of visits the card worked in the venue, and in 15 per cent of visits the requested limits had been set by venue staff.

Figure 14.5 Case study of successful sign up

Venue type: Club

Venue location: Inner metro

One case of a successful sign up was on the whole, a positive experience. The mystery shopper enquired about the loyalty program and was handed an application form which included a consent box for YourPlay. In response to this, staff enthusiastically commenced the loyalty sign up process and YourPlay registration. Identification was requested and although a drivers' licence was sufficient for the venue, for sign up purposes it was more information than required. Furthermore they did ask whether the shopper intended to remain in the venue for a little while as they had a few steps to go through.

The mystery shopper observed the other staff member was being trained in signing up for YourPlay by the manager who initiated the application process. The explanation provided by the staff was very thorough, with numerous benefits being explained and presenting YourPlay in an inclusive way "it's for anyone so that they know how long they're in here for because it's easy to forget." The staff member (not manager) went over to the kiosk and set up the limits nominated by the shopper, and walked the shopper through the entire process step by step with a positive demeanour.

It is worth mentioning that the potentially negative consequence of the interaction was that the sign up process took about 45 minutes, which may be longer than the average individual would expect to wait to be signed up for a service. The long duration was on the account of the staff member being trained on the IT sign up process, a comprehensive explanation of YourPlay, its benefits and how to use it following the sign up, a step-by-step activation at the kiosk which was slow to respond, followed by a demonstration in the EGM.

Although the researchers did not strictly monitor the time break down of the whole sign up process, they estimated the following:

- 5 minutes: Enter venue, greeting, request loyalty program.
- 25 minutes: Sign up to loyalty program and YourPlay (staff member being trained).
- 10 minutes: Kiosk activation and comprehensive explanation if YourPlay and all its benefits.
- 5 minutes: EGM demonstration.

14.4 Outcomes of the Mystery Shopping Visits

Outcomes and nature of unsuccessful visits

In order to test the range of paths that gamblers might follow in attempting to join YourPlay the mystery shopping trialled a range of strategies for joining YourPlay with the assistance of venue staff. Where possible researchers sought to join YourPlay through a venue loyalty scheme as feedback from industry stakeholders identified this as the most typical sign-up route. Due to logistical constraints, most importantly that cancelling a YourPlay account takes 24 hours, alternative pathways of joining through a loyalty scheme were also tested as was joining through a casual YourPlay card. This meant that visits were split between one of the following five paths, in each case a staff member was asked to set a limit on the YourPlay account:

- Joining a venue based loyalty scheme and setting up a new registered YourPlay account at the same time;
- Joining a venue based loyalty scheme and linking this to an existing YourPlay account;
- Joining a venue based loyalty scheme and linking this to a casual YourPlay account;
- Setting up a registered YourPlay account (no loyalty account); and
- Obtaining a casual YourPlay card.

A successful sign-up is defined as a YourPlay card (or linked loyalty card) being issued on the day, that card working in the venue's kiosk and/or EGMs, and the requested limits having been set. If a card was issued and worked, but the requested limits had not been set then this was coded as a partial success. Visits were coded as a success even if the form in which the card was obtained differed from that initially sought (e.g. if a mystery shopper seeking a registered YourPlay card linked to a venue loyalty scheme was given a casual YourPlay card that was still treated as a success provided the card worked and the correct limit was set).

Four visits were excluded from the outcome analysis. One visit was excluded because the YourPlay helpline had not processed a cancellation request, and when they went to join at a venue they found they were already registered. Three visits were excluded as the loyalty program data we held was incorrect and researcher was inadvertently tasked with attempting a sign-up to loyalty and a registered YourPlay account when they were already members of that loyalty program from an earlier shopping visit.

The three shopping visits where contact was not able to be made with venue staff, and the one visit where the researcher could not gain access to the gaming room are included in the analysis of outcomes as they represent visits in which it was not possible to obtain a YourPlay card.

Looking first at the distribution of outcomes on a venue basis (see Table 14.3), both visits were successful in 7.4 per cent of 'lower use' and 4 per cent of 'higher use' venues, 5 of the 69 venues in which sign-ups could be tested. One of the two visits was successful in a further 14 venues (16.7 per cent of low use venues and 20 per cent of higher use venues). Two thirds of low use venues and 56 per cent of higher use venues achieved neither a success nor a partial success in either of the visits.

Table 14.3 Mystery shop outcomes on a venue basis

	Low use		Higher use		All venues	
	Number	Share of adj. total (%)	Number	Share of adj. total (%)	Number	Share of adj. total (%)
2 visits successful	4	7.4	1	4.0	5	6.3
1 visit successful 1 visit partially successful	2	3.7	2	8.0	4	5.1
1 visit successful 1 visit unsuccessful	7	13.0	3	12.0	10	12.7
2 visits partially successful	2	3.7		0.0	2	2.5
1 visit unsuccessful 1 visit partially successful	3	5.6	3	12.0	6	7.6
1 visit unsuccessful 1 visit excluded	0	0.0	2	8.0	2	2.5
0 visits successful	36	66.7	14	56.0	50	63.3
Both visits to venue excluded	0	n/a	1	n/a	1	n/a
Total without excluded venue	54		25		79	

Table 14.4 summarises the outcomes on a visit basis including the broad reason for unsuccessful visits. Of the 157 visits in which the performance in issuing cards could be assessed there were 24 successes, e.g. the researcher was able to secure a YourPlay card, the card worked in the venue and the requested limit had been set. A further 14 visits achieved a partial successes where a YourPlay card was supplied and worked but where the requested limit had not been set. In 119 cases the visit was unsuccessful, either because a card was not obtained, or because the card when issued did not work.

Table 14.4 Mystery shop outcomes on a visit basis

	Outcome (n=157)	Share of total (%)
Successful: card worked and requested limit set	24	15.3
Partially successful: card worked but limit not set	14	8.9
Unsuccessful: YourPlay card supplied but it did not work	31	19.7
Unsuccessful: No YourPlay card (loyalty card only)	30	19.1
Unsuccessful: No YourPlay card (no card issued)	58	36.9
Total unsuccessful	119	75.8
Total	157	

A summary the outcomes of the mystery shopping visits identifying the reasons for unsuccessful visits in more detail is shown in Table 14.5 and Figure 14.6.

Equipment issues as a reason for an unsuccessful visit typically refers to cases where the YourPlay kiosk and the readers on gaming machines in the venue were not able to read the cards, although in some cases it refers to other equipment such as that used by the venue staff to encode the card.

Table 14.5 Mystery shop outcomes on a visit basis, detailed reasons for unsuccessful visits

Outcome	Number	Per cent
Successful	24	15.3
Partial success: Limit not set	14	8.9
Card did not work: Equipment issues	19	12.1
Card did not work: Not set up correctly	1	0.6
Card did not work: System down	3	1.9
Card did not work: PIN issues	1	0.6
Card did not work: Unknown	7	4.5
No card: Loyalty card only, loyalty card mailed out, patron would need to return to venue to get YourPlay added	4	2.5
No card: Loyalty card only, lack of staff knowledge	2	1.3
No card: Loyalty card only, excess ID	6	3.8
No card: Loyalty card only, staff refused	5	3.2
No card: Loyalty card only, equipment failure	3	1.9
No card: Loyalty card only, system down	6	3.8
No card: Loyalty card only, unknown	4	2.5
No card: Excess ID required	18	11.5
No card: System down	8	5.1
No card: Staff refused	7	4.5
No card: Staff busy	5	3.2
No card: No cards in venue	2	1.3
No card: Lack of staff knowledge	6	3.8
No card: Internet down	2	1.3
No card: Unknown	10	6.4
Total	157	

Fifty six per cent of sign up attempts ended with **no YourPlay card received** (in 58 cases no card of any type was obtained, and in 30 cases only a venue loyalty card was provided). In a further 20 per cent of visits the YourPlay card obtained would not work in the venue, either because of an issue with the card or with the venue's card reading hardware. Researchers frequently reported that the kiosk used to administer the cards and set personal limits was very slow and in some cases non-responsive and that venue staff seemed to find it difficult to navigate.

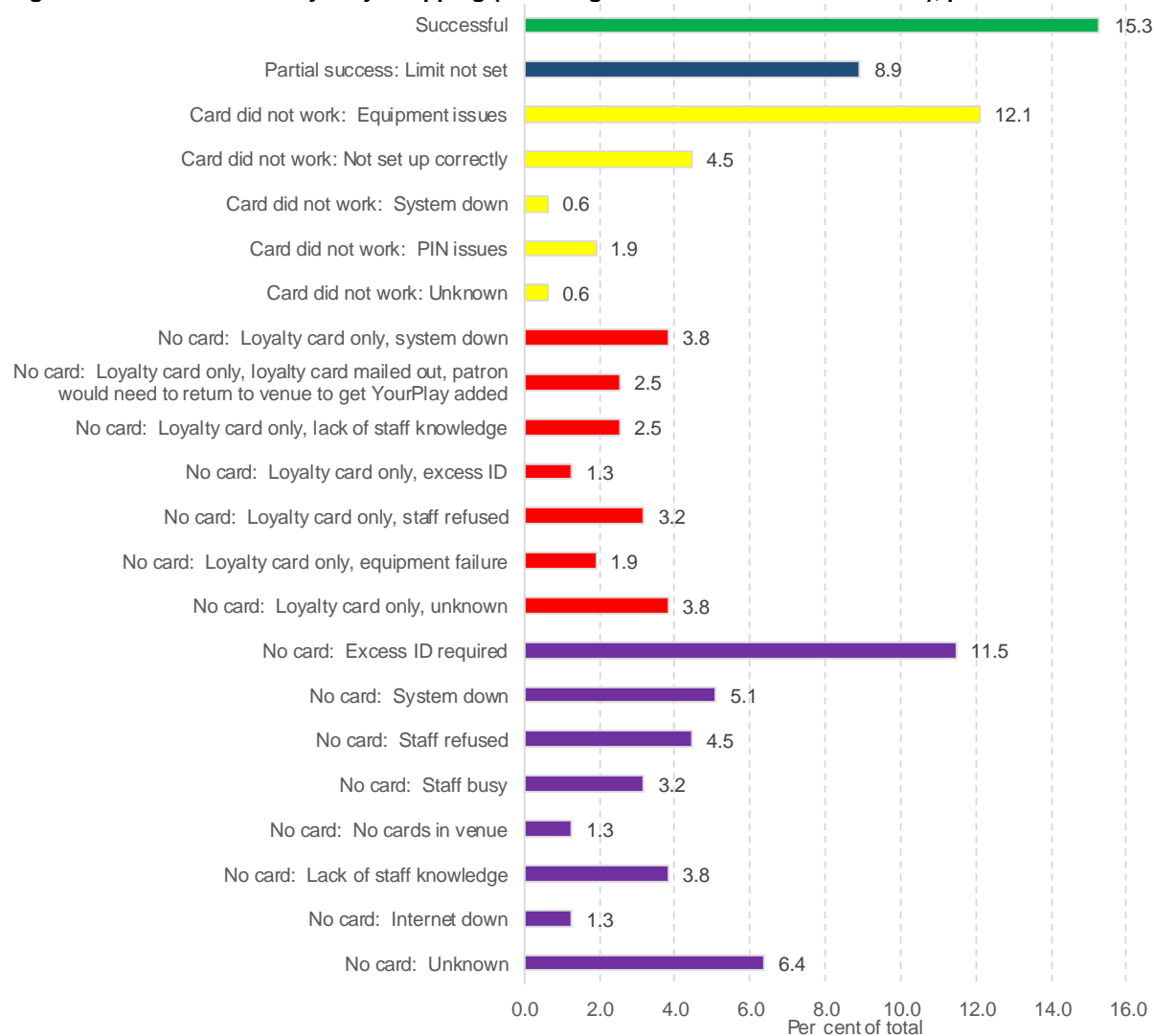
In terms of key differences:

- Cards were more likely to be issued (whether or not they actually worked) by hotels located in inner metropolitan or outer metropolitan areas than by venues located in regional areas.
- Researchers were more likely to successfully obtain a casual player card from hotels compared with clubs (50 per cent compared with 17 per cent).
- Loyalty sign ups only were more likely to be from regional venues (27 per cent compared with 19 per cent overall).

Difficulties in achieving a successful outcome occurred across all of the broad approaches taken to joining YourPlay. For example, there were 34²⁴ visits that sought to join YourPlay through joining the venue's loyalty program and registering a new YourPlay account, 13 of those attempts resulted in a YourPlay card being issued. When the researchers then went to check the card in the machine a number found that either the card did not work, or that the requested limit had not been set (with the latter recorded as a partial success). This meant that out of the 13 'loyalty and registered YourPlay' sign up attempts where a card was issued, in the end 6 were actual successes, with the card working in the venue and the requested limit set and 1 was a partial success with the card working but with the limit not having been set.

²⁴ 38 attempts were actually scheduled using this approach, but in four cases difficulties relating to pre-existing membership of YourPlay or venue based loyalty schemes meant that four of the visits using this approach were not able to test the success in achieving a sign up to YourPlay.

Figure 14.6 Outcome of mystery shopping (including reason for unsuccessful visit), per cent



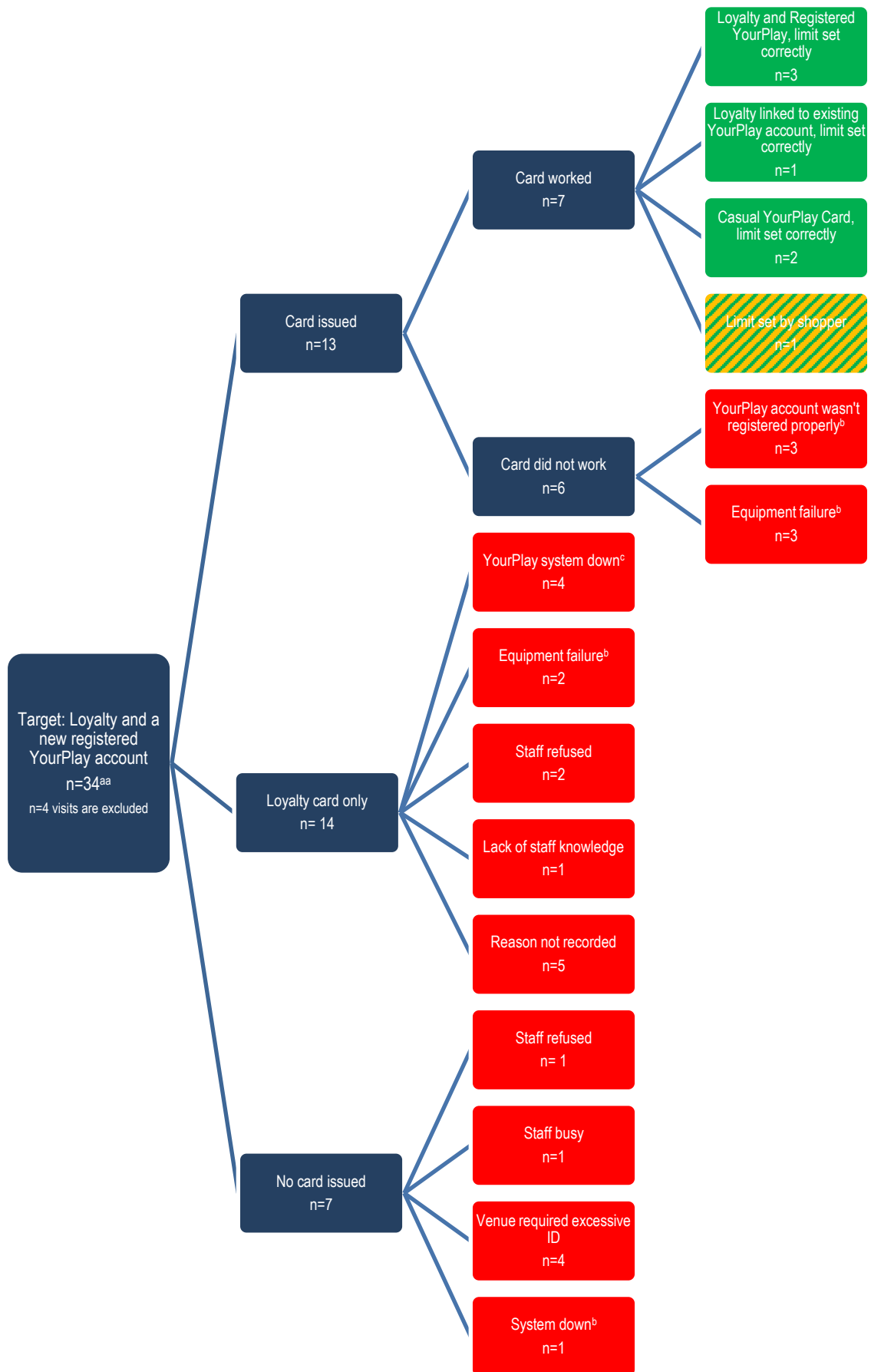
Note: n=157 as in four visits it was not possible to assess the success in joining YourPlay
 Where the reason for an unsuccessful outcome is listed as 'unknown' this is because the researcher has completed the information in the form on the nature of the unsuccessful outcome but did not complete the free text box explaining why the outcome was not achieved.

Similarly, of the 92 attempts to join YourPlay through a casual user card with limits set in the venue, 48 visits resulted in a card being issued to the researcher. Of these 48 casual cards issued by venues when a casual card sign-up was attempted, there were 25 cards that actually worked in the venue, and 14 cards had the requested limit set on them (including one case where the researcher had been signed up to a venue loyalty card and a linked registered YourPlay card when they sought to join using a casual card).

Figures 14.7, 14.8, 14.9, 14.10 and 14.11 set out the progress through the sign up attempt for each of the four broad approaches taken to signing up with YourPlay in a venue. This is illustrated using a 'decision tree' format to illustrate the pathways taken, the stages at which a problem occurred, and the broad nature of the problem. Within the decision trees, 'process' steps are coloured in blue, with outcomes shaded green if they were successful, green and yellow if partially successful, and red if unsuccessful.

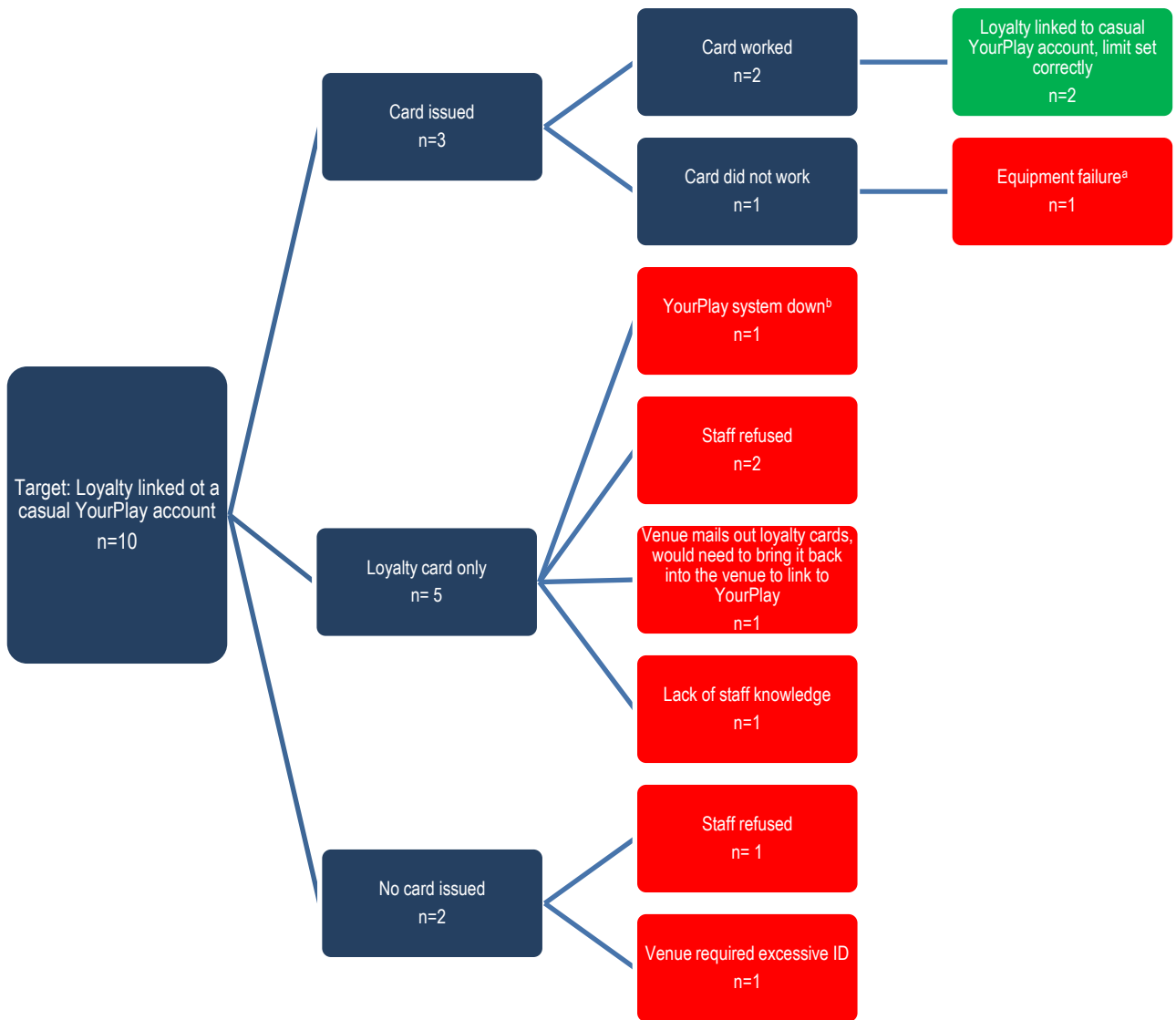
Sign up of a venue based loyalty scheme and a new registered Your Play account is shown in Figure 14.7. The pathways followed in attempts to sign up by linking a venue based loyalty scheme to a casual YourPlay account is illustrated in Figure 14.8. The process taken in joining YourPlay as a registered user (without joining a loyalty scheme) is shown in Figure 14.9. The process of joining YourPlay by linking an existing YourPlay account to a venue based loyalty account is shown in Figure 14.10. Finally, the pathways experienced in attempting to access a new 'casual' user card, with limits set by venue staff, is shown in Figure 14.11.

Figure 14.7 Attempted sign up to loyalty and new registered YourPlay account



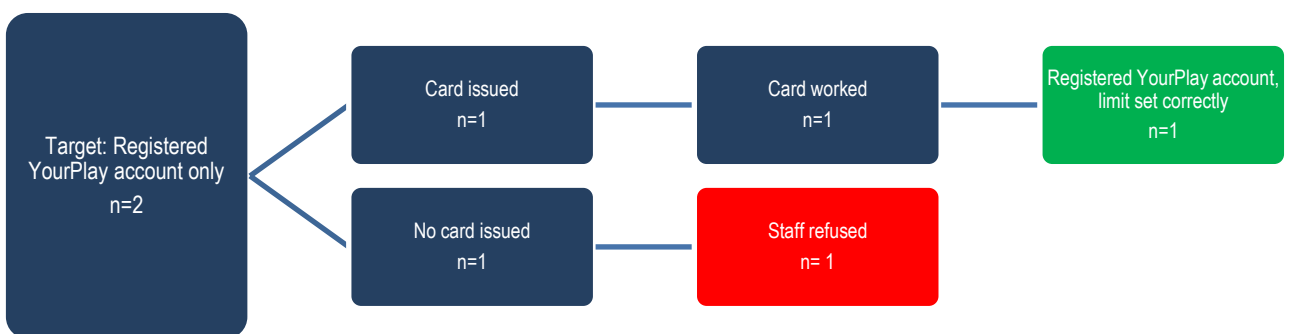
Key Note **Blue** = process step; **green** = a successful outcome; **green and amber hashed** = a partially successful outcome; and **red** = unsuccessful outcome
^a 4 of the n=38 visits were excluded, 1 as the helpline had not cancelled a YourPlay registration, and 3 cases where database errors meant that a researcher tried to join a loyalty scheme they were already members of leading to the visit being aborted before sign-up could be tested.;
^b System failure observed by researcher;
^c System failure reported by venue staff member

Figure 14.8 Attempted sign up to loyalty linked to a casual YourPlay account



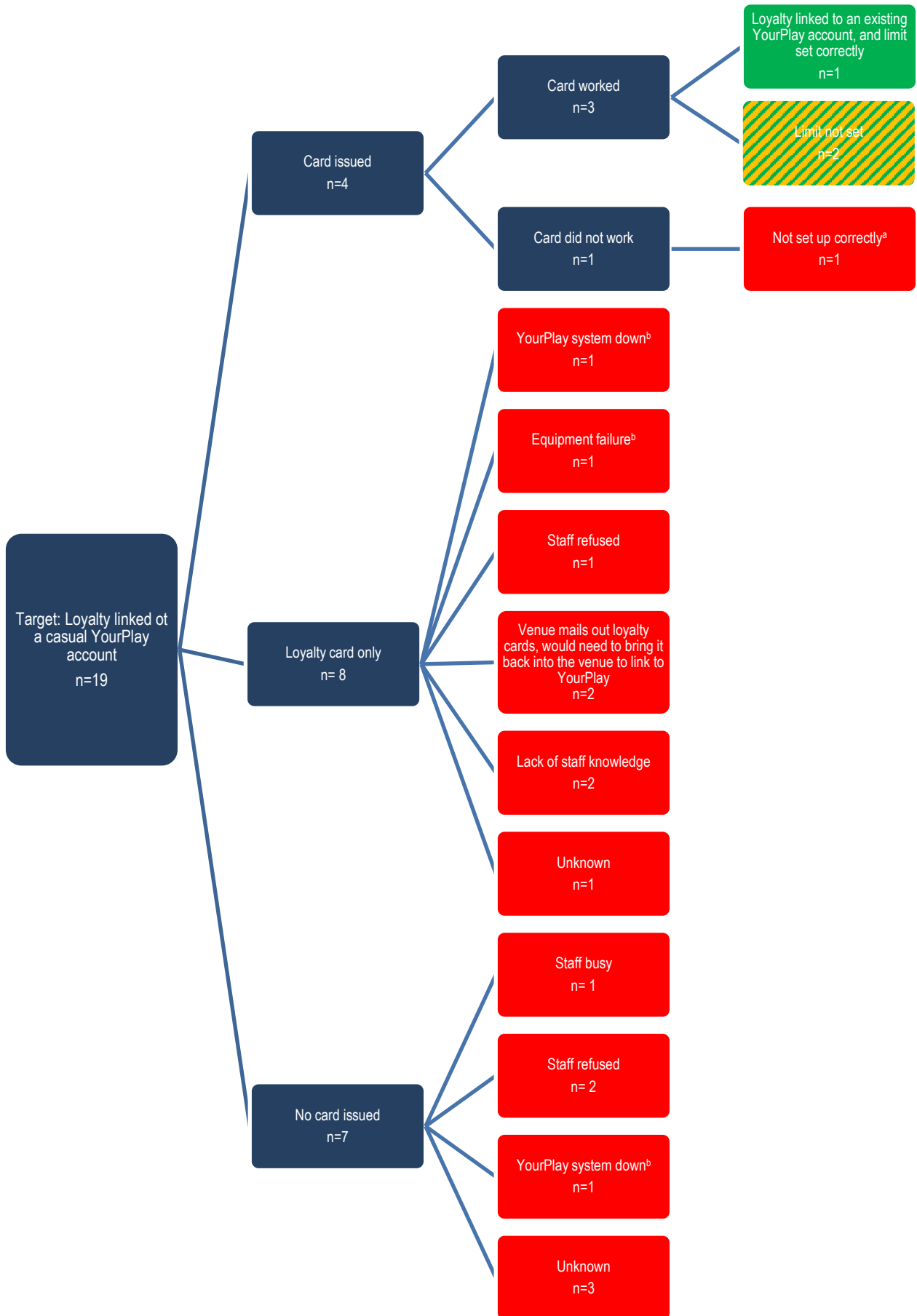
Key **Blue** = process step; **green** = a successful outcome; **green and amber hashed** = a partially successful outcome; and **red** = unsuccessful outcome
 Note ^a System failure observed by researcher; ^b System failure reported by venue staff member

Figure 14.9 Attempted sign up to a registered YourPlay account only



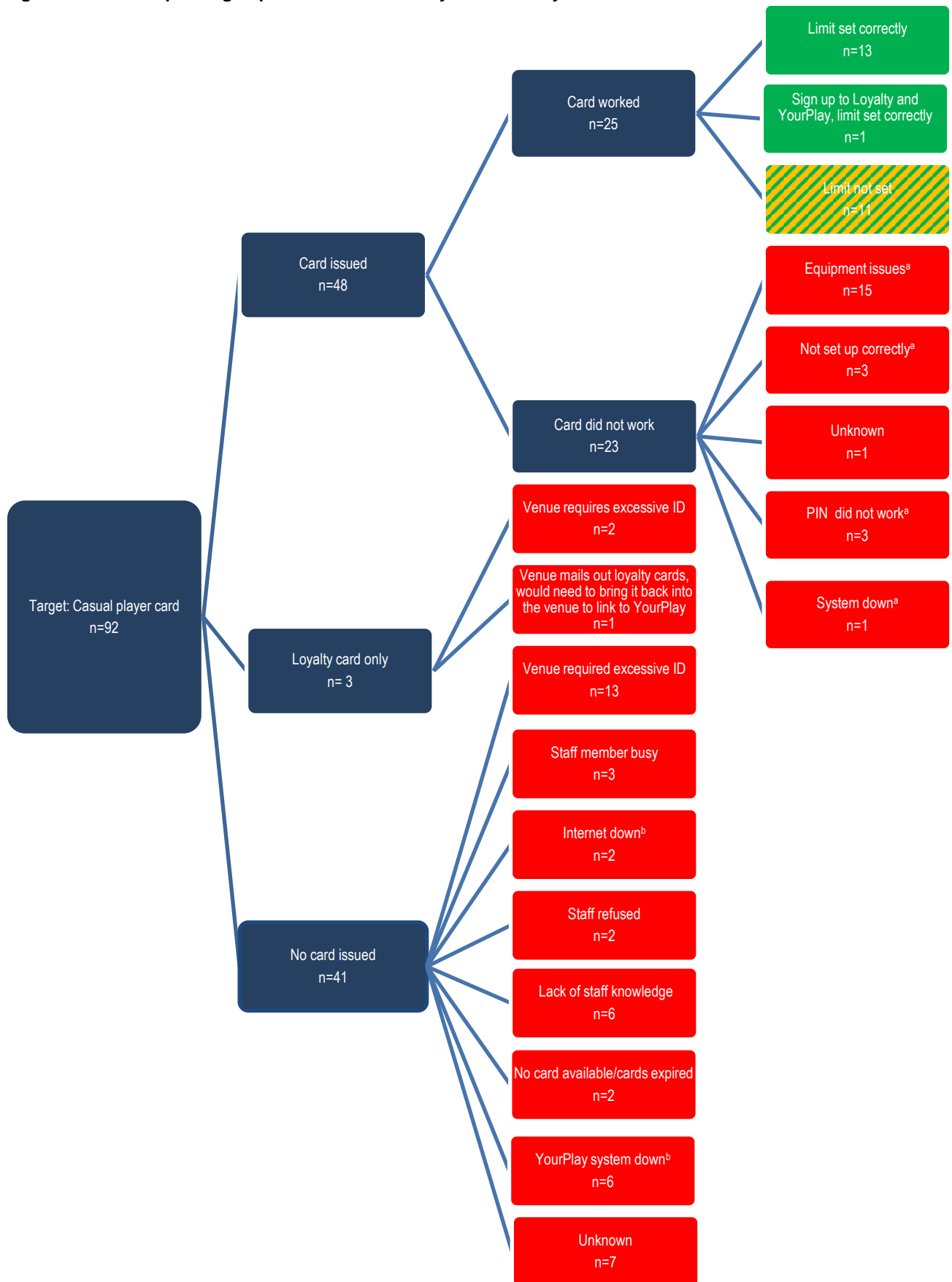
Key **Blue** = process step; **green** = a successful outcome; **green and amber hashed** = a partially successful outcome; and **red** = unsuccessful outcome
 Note ^a System failure observed by researcher; ^b System failure reported by venue staff member

Figure 14.10 Attempted sign up to loyalty linked to an existing YourPlay account



Key Note
 Blue = process step; green = a successful outcome; green and amber hashed = a partially successful outcome; and red = unsuccessful outcome
 a System failure observed by researcher;
 b System failure reported by venue staff member

Figure 14.11 Attempted sign up to a Casual YourPlay account only



Key Note: Blue = process step; green = a successful outcome; green and amber hashed = a partially successful outcome; and red = unsuccessful outcome
^a System failure observed by researcher;
^b System failure reported by venue staff member

Where an outcome is recorded as being unsuccessful because the ‘system was down’ or ‘the internet was not working’ this was in most cases coded based on the explanation provided to the shopper by the staff member. It was naturally not feasible for the researchers to verify information provided by venue staff. Where an outcome is coded as unsuccessful because the card was not working that was in all cases based on the personal observation of the mystery shopper.

There were also some visits where the researcher only completed the outcome information without completing the free text fields to explain why the outcome was not achieved. In these cases the reason for the outcome has been coded as ‘unknown’.

Researchers’ observations

The checklist allowed researchers to write down observations on the wording and way in which **YourPlay was explained** to them for each mystery shop. The comments recorded by researchers were later coded by ORC. While 57 per cent of mystery shopping visit reports did not provide a comment (because it was optional), according to the written observations, the following comments were made:

Positive:

- 8 per cent of visits reported staff as well informed about YourPlay.
- 4 per cent of visits reported staff as professional and helpful; and

Negative:

- 12 per cent of visits reported there was a lack of knowledge and awareness.
- 7 per cent of visits reported that comments made by staff were negative due to low usage of YourPlay.
- 4 per cent of visit reports mentioned that they were told that the scheme was aimed at “problem gamblers” or a “good system for problem gamblers”.
- 3 per cent of visit reports noted staff promoted or favoured their loyalty program over YourPlay.
- 3 per cent of visit reports noted comments venue staff framing YourPlay as a tool for the government to track people’s gambling spending.

Furthermore, staff who had clear knowledge gaps often seemed confident in what they were saying. For instance, one staff member said that the “only way to sign up was online” without any hesitation. Another staff member believed that potential gamblers could only obtain a YourPlay card if they signed up to the loyalty program and wasn’t aware of the availability of casual cards until the manager overheard and stepped in to advise that a casual card was the most suitable option. There were also staff who didn’t seem confident in the sign up process having to seek assistance from their managers, although the managers were often in the peripheral of the interaction and were able to take over. Based on observation, researchers noticed this happened more frequently rather than teaching the other staff member the sign up process in a more collaborative and demonstrative way.

Conclusions

The mystery shopping visits clearly show that non-compliance with the regulations around promoting and assisting gamblers to join YourPlay were extremely widespread, with an overwhelming majority of venues visited unable to successfully sign gamblers up to YourPlay and then have the card work in the venue with the requested limit set.

There was a wide variety of causes for the non-compliance ranging from poor staff training, through to poor quality equipment (e.g. in 22 of the 157 failed due to reported equipment issues, with a further 19 visits failing due to staff reporting that either the system was down or the internet was down²⁵). However there were also cases where venues appeared to have established policies that were in clear contravention of the scheme’s regulations such as only assisting gamblers to join YourPlay if they also joined the venue’s loyalty scheme, or requiring ID for casual user cards. Twelve of the 157 visits failed because staff refused to join the researcher to YourPlay, and a further 24 failures were due to venues demanding excessive identification (including six cases where the proof of address and identity demanded was more stringent for YourPlay than for joining the venue’s loyalty scheme resulting in the loyalty scheme being joined but not YourPlay).

There were also a small number of visits (four) which failed as the venue had a policy of centrally processing loyalty scheme memberships and then mailing the card out, but where this central processing would not involve joining the gambler to YourPlay at the same time and the researchers were told that if they wanted to join YourPlay they would have to bring the loyalty card back into the venue and have it added there. It would be

²⁵ The researchers were not able to verify whether this explanation was correct.

worth clarifying to venues that if they choose to process loyalty memberships centrally this needs to include linking the card to YourPlay when requested.

Whilst it may be tempting to ascribe the identified problems to “a few bad apples” it should be noted that our sampling was able to test the sign-up practices of 79 of the 495 Victorian hotels and clubs with active gaming machine entitlements as at March 2018, or roughly one venue in six. This means our analysis should be reflective of the sector as a whole (except for venues located more than 3 hours’ drive from Melbourne which were excluded for logistical reasons).

Indeed, as our sampling strategy over sampled those venues which had higher rates of using YourPlay, our analysis may overstate the average performance of venues.

The scale and breadth of this non-compliance clearly indicates that the current approach of the VCGLR as the regulator of focussing on collaborative and education based approaches to industry to achieve compliance is not working.

Recommendation 22: Given the widespread range of failures observed in venues around YourPlay sign up, including frequent equipment failure, we recommend that the Department work with the VCGLR to shift from the current ‘collaborative’ approach to regulation to a compliance and enforcement based regulatory model including use of the available penalties for compliance failures until venue practices improve.

Part D Impact and Cost Effectiveness

15. Self-Reported Impact of YourPlay on Gambling

In order to analyse the impact of using YourPlay on gamblers, a total of fourteen questions were asked in the survey of YourPlay cardholders (see Chapter 13) seeking information about how YourPlay influenced the gambling behaviour, knowledge and awareness of respondents.

This has been used as one of the two sources of estimates for impacts of the scheme. Section 15.1 summarises the key findings in terms of impact, and quantifies the potential benefits, with details of the reported impacts outlined in section 15.2.

It is important to note that as demographic data on YourPlay cardholders is not available, it is not possible to assess how the demographic profile of the respondents to the cardholder survey compares to that of the population of cardholders as a whole. This means that we have not been able to assess the representativeness of the survey respondents.

If the respondents are not representative of the underlying population then it likely that the reported impact from, and satisfaction with, YourPlay will differ from that of the overall population of cardholders, however there is no way of knowing whether impacts would be smaller or larger.

15.1 Key findings

Amongst the respondents to the survey, there was clear evidence that using YourPlay had a positive impact both in terms of consumer protection outcomes and (somewhat less clear) harm minimisation.

Not all respondents to the survey completed the questions on impact (16 per cent). This creates uncertainty as to whether or not those who did not complete these questions should be included in the base for the purpose of calculating the share of respondents receiving benefits.

Using the estimates that exclude non-respondents in calculating impact effectively assumes that those who did not complete the impact section of the questionnaire had an average impact equal to that of respondents. Using the estimates that include non-respondents effectively assumes that none of them received any benefit.

It is not clear from the available data which assumption is more likely to be correct. For the purposes of this analysis we have taken the conservative approach of assuming that those survey respondents not completing the impact section of the survey had not received any benefits from YourPlay.

Twenty eight per cent of respondents who answered the question on impact reported that YourPlay meant they were “a great deal” or “quite a lot” better informed about their gaming machine spending, and 29 per cent reported that using YourPlay meant that it was “a great deal” or “quite a lot” easier for them to stick to the limits that they set for themselves.

The reported impact on net spending was equally positive, with a net²⁶ 4 per cent of respondents reporting that they had been able to reduce their gaming expenditure by 1 to 10 per cent using YourPlay; a net 4 per cent reported that they had been able to reduce their expenditure by between 11 to 20 per cent; and a net **18** per cent of respondents reported that they had been able to reduce their expenditure by more than 20 per cent.

Even taking the more conservative approach of assuming that those survey respondents who did not complete the benefits section of the questionnaire did not receive benefits from YourPlay it would still mean that 23 per cent were better informed about their gambling, and 24 per cent had found it easier to stick to the limits they set themselves.

Similarly, even taking the more conservative approach the proportion of survey respondents who experience a desired expenditure reduction would still be a net 3 per cent reducing expenditure by 1 to 10 per cent, a net 3 per cent reducing expenditure by 11 to 20 per cent and a net 15 per cent reducing expenditure by more than 20 per cent.

Reported impacts were much more common amongst those classified as problem gamblers or moderate risk gamblers than amongst low risk gamblers or non-problem gamblers, which suggests that much of the expenditure reduction benefit is a harm minimisation benefit rather than a consumer protection benefit.

²⁶ In this context the net impact refers to the proportion of respondents indicating that they have reduced expenditure by the category value minus the proportion indicating that they have increased expenditure by this amount. So the 6 per cent of respondents who indicated their expenditure fell by 1 to 10 per cent minus the 2 per cent of respondents who indicated that their expenditure increased as a result of YourPlay gives a *net* change of -4 per cent.

It is possible to convert these reported net impacts on expenditure into an estimated average reduction of spending for YourPlay cardholders. Assuming that the actual impact was at the mid-point of the ranges (and assuming that >20 per cent averages a 25 per cent reduction), and using the distribution of impacts and annual average gaming spending by gambler risk level allows the calculation of a weighted average spending reduction. For the purposes of this analysis it was assumed that gamblers who did not complete the impact section of the questionnaire received no benefits from YourPlay.

Combining these parameters gives a **weighted annual benefit per YourPlay cardholder of \$1,960.71** in reduced expenditure to more closely meet spending preferences. (Problem gamblers and moderate risk gamblers have an average benefit of \$3,479.35 and low risk gamblers, non-problem gamblers and those who did not complete the PGSI questions have an average benefit of \$27.90.)

The extent to which this average impact from the survey sample can be applied to YourPlay cardholders as a whole will depend on how representative the survey results are of the overall population of YourPlay cardholders. Whilst our sample had a significantly higher proportion of problem gamblers than the overall population of gaming machine gamblers (comparing to the 2014 Victorian Gambling Survey), the proportions by risk level are roughly in line with those who gambled at least once per week in the VGS. If the overall population of YourPlay cardholders has a risk profile in line with gaming machine gamblers as a whole then our estimates will overstate the potential impact, however if the risk profile matches that of weekly gamblers then our estimates are likely to be broadly representative.

It is also worth noting that survey respondents whose most common location for gaming was the Melbourne Casino reported slightly lower average impacts, for example the weighted average reduction in spending amongst problem gamblers and moderate risk gamblers who gambled at the Melbourne Casino was 5.4 per cent, whereas for those who gambled at hotels and clubs the average impact was 6.3 per cent. This difference should be treated with a degree of caution as the small sample sizes involved means that the apparent difference could simply be random variation amongst responses rather than a real underlying difference.

15.2 Details of impact

Enjoyment

Figure 15.1 shows responses regarding whether YourPlay had any impact on the enjoyment that respondents received from playing pokies. A clear majority (66 per cent) reported there was no change in their enjoyment from using YourPlay. Relatively more respondents reported that using YourPlay had decreased their enjoyment from playing the pokies than increased their enjoyment (20 per cent c.f. 14 per cent).

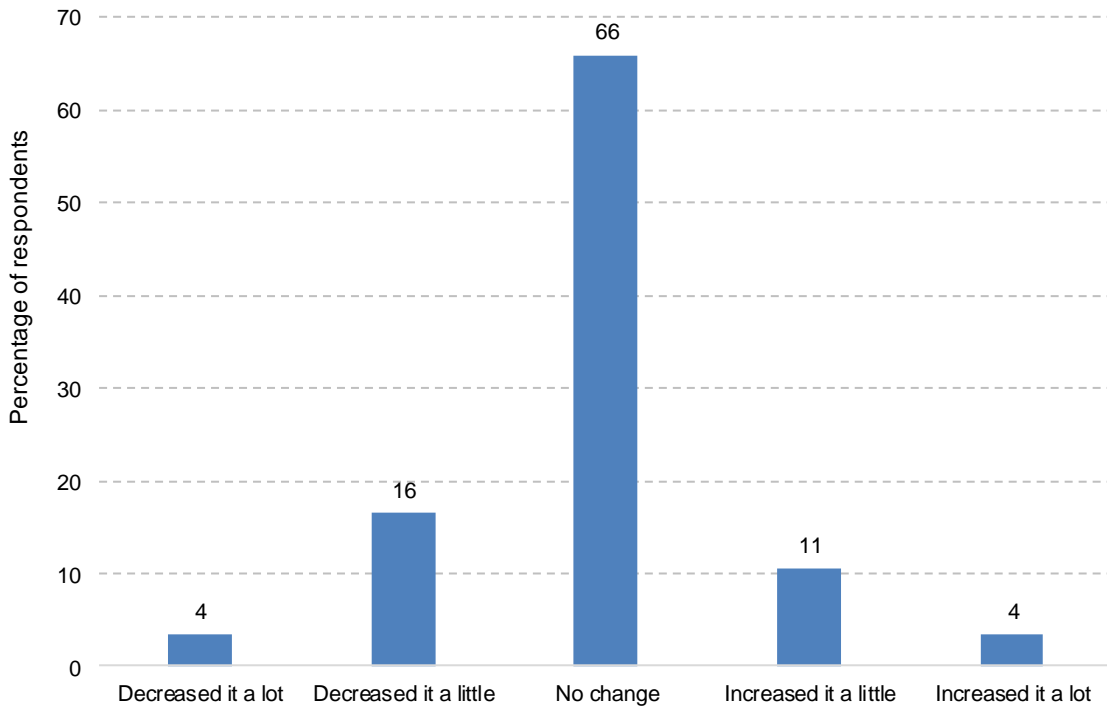
Further analysis on the risk profile of respondents shows that 64 per cent of high-risk gamblers and 67 per cent of moderate-risk gamblers reported as having 'no change' in the enjoyment they get from playing the pokies when using YourPlay. Furthermore, 21 per cent of high risk gamblers and 17 per cent of moderate risk gamblers reported that their enjoyment had decreased. Hence the enjoyment profile for high and moderate risk gamblers is not significantly different from all gamblers who used YourPlay.

Being better informed and sticking to limits

Next, respondents were asked if using YourPlay has made them better informed about how much money and time they are spending. Approximately 85 per cent of respondents indicated that YourPlay had made them better informed to some varying degree, while 15 per cent said it had not made them better informed (see Figure 15.2). The most common response (39 per cent) was that YourPlay had made respondents better informed 'to some degree'. About 13 per cent said they were better informed 'a great deal', while 17 per cent indicated they were better informed only 'a little bit'.

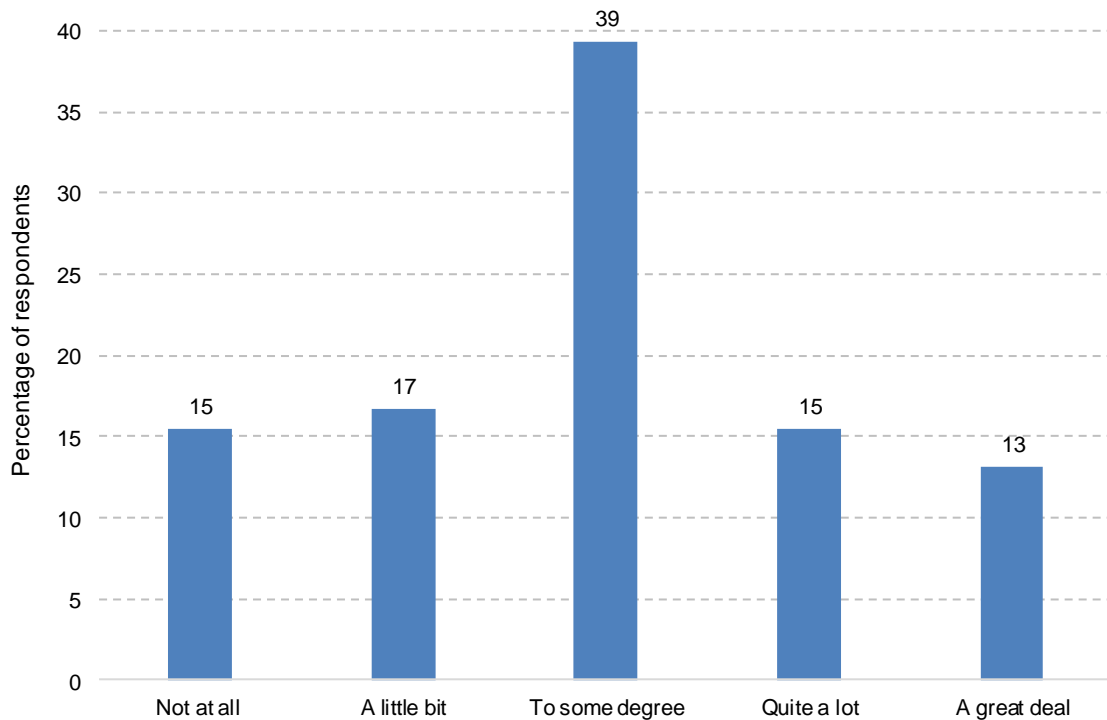
Further analysis based on risk profile of gamblers indicates that problem gamblers were less likely to be better informed compared to all respondents. Twenty one per cent of problem gamblers reported 'not at all' in terms of being better informed; 24 per cent reported 'a little bit'; 29 per cent reported 'to some degree'; 16 per cent 'quite a lot'; and 11 per cent reported 'a great deal'. These differences are not statistically significant.

Figure 15.1 Impact of using YourPlay on enjoyment from playing the pokies, per cent



n = 83 respondents
 Note: Results expressed as a proportion of the total excluding non-responses.

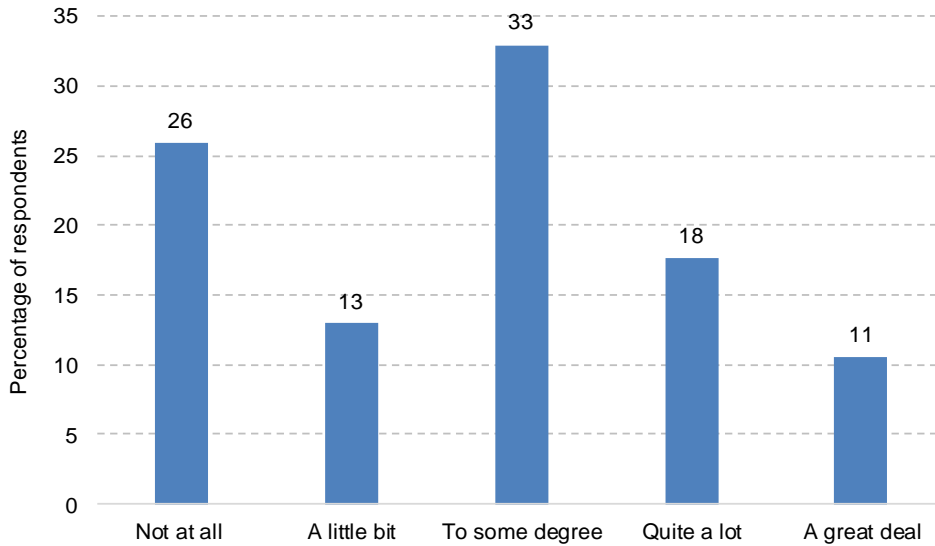
Figure 15.2 Whether YourPlay has meant that respondents are better informed about how money and time they are spending



n = 84 respondents

Three-quarters of respondents indicated that using YourPlay has made it easier to stick to the limits that they have set for themselves, while the remainder (26 per cent) found it had not made it easier (see Figure 15.3). There was a tendency for YourPlay to only help respondents stick to limits to a modest degree, with 46 per cent indicating YourPlay made it easier ‘a little bit’ or ‘to some degree’, whereas 28 per cent found it made it easier ‘quite a lot’ or ‘a great deal’.

Figure 15.3 Whether YourPlay has made it easier to stick to the limits respondents have set for themselves



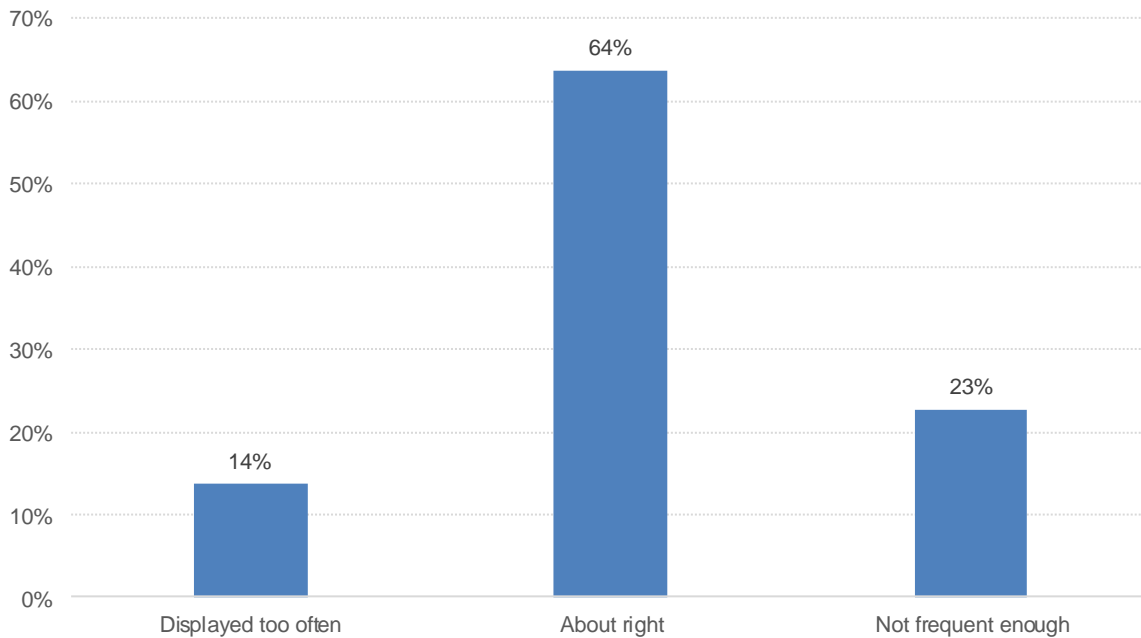
n = 85 respondents

YourPlay messages

Survey respondents were also asked if they have noticed the YourPlay messages that pop-up when they are playing to notify them of how much time and money they have spent, and then asked to comment on the appropriateness of the frequency of the pop-up message.

Of the 66 respondents who commented on the frequency of the messages, a clear majority of this group (64 per cent) felt that the frequency of messages was ‘about right’. Approximately 14 per cent felt they were displayed too often, whereas 23 per cent felt that they were not displayed often enough (see Figure 15.4).

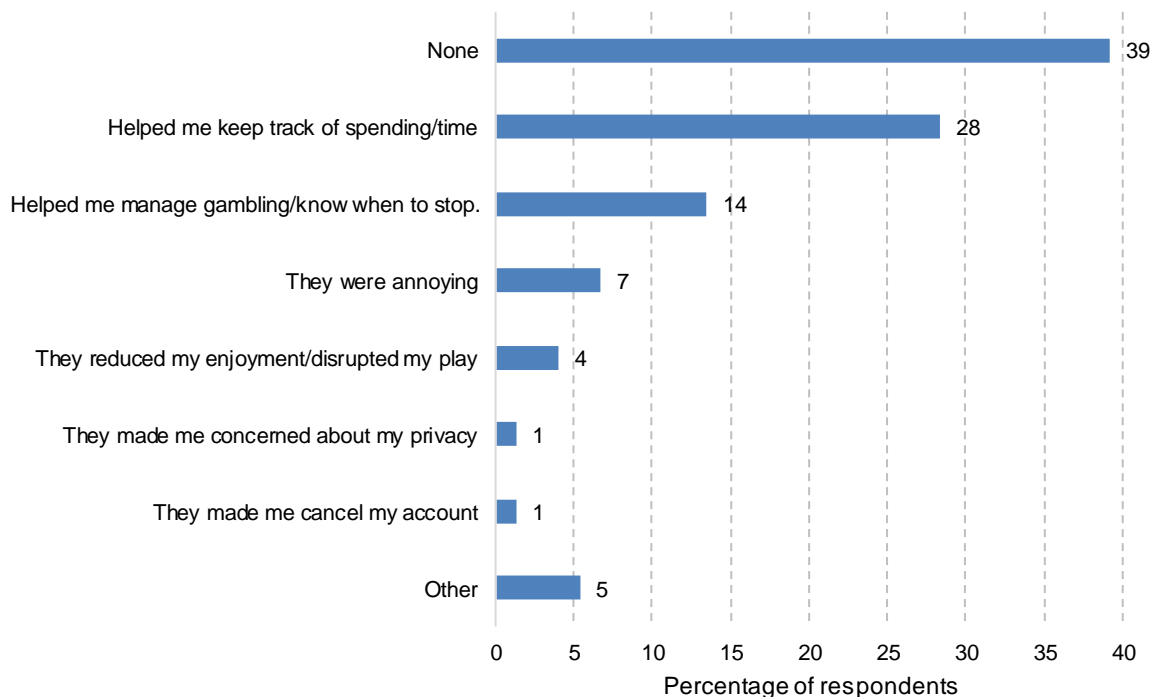
Figure 15.4 Frequency of pop-up messages



n = 66 respondents

The pop-up messages generally had positive or no impacts on a respondent’s gambling session. Of the 74 respondents who commented on the impact the messages had on their gambling, 28 per cent felt they ‘helped them to keep track of their spending/time’, while approximately 14 per cent said it ‘helped them to manage their gambling and know when to stop’ (Figure 15.5). However the most common impact was ‘none’ reported by 39 per cent of respondents. The most common negative impact was that the messages ‘were annoying’ (7 per cent of respondents) with 4 per cent indicating that they ‘reduced their enjoyment or disrupted play’.

Figure 15.5 Impact of pop-up messages on gambling session

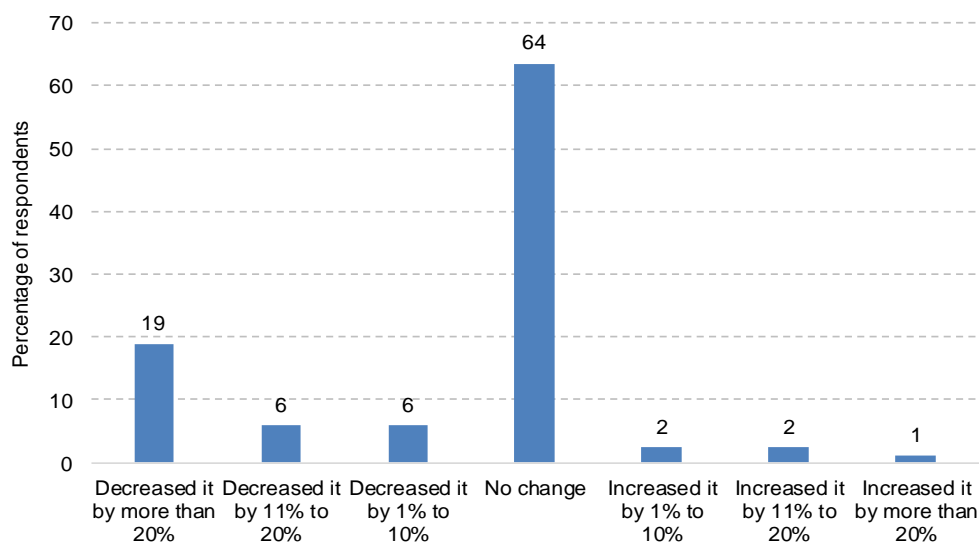


n = 74 respondents

Impact on spending and time played

Almost two-thirds of respondents (64 per cent) indicated that using YourPlay had not changed how much money they spent playing gaming machines (see Figure 15.6). Almost one-third (31 per cent) indicated that it decreased their spending, with 19 per cent saying it decreased their spending by more than 20 per cent. On the other hand, 5 per cent of respondents claimed that using YourPlay had increased how much they spent. These results were further analysed based on risk profile. Some 61 per cent of high-risk gamblers and 50 per cent of moderate risk gamblers reported ‘no change’ in the amount spent.

Figure 15.6 Impact of using YourPlay on how much money respondent spent playing gaming machines

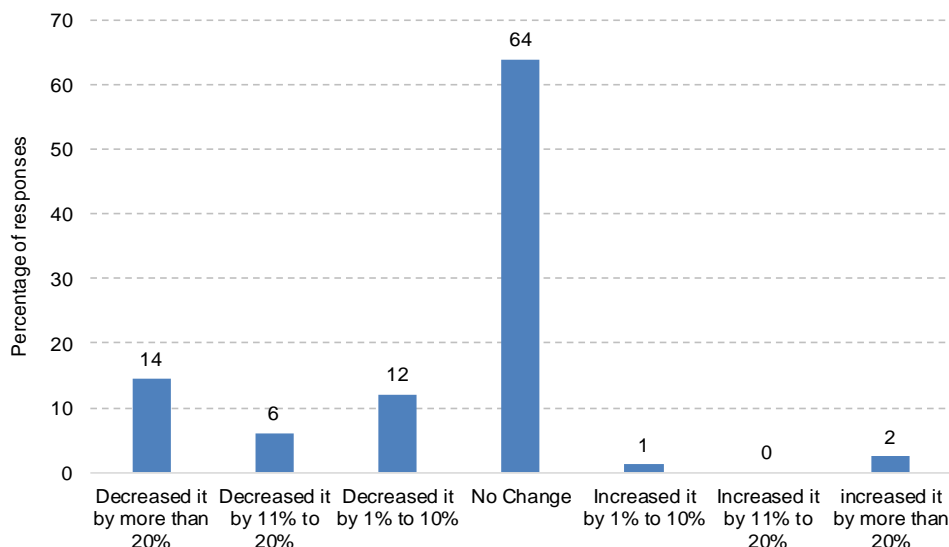


n = 85 respondents

Respondents were asked a similar question with respect to time (Figure 15.7). About two-thirds of respondents (64 per cent) advised that using YourPlay had no impact on the time spent playing the pokies. For remaining respondents, using YourPlay generally led to a reduction in time spent playing gaming machines. One-third of respondents indicated that their time played decreased whereas very few (4 per cent) reported that time played had increased. Beyond no change in time played, a decrease in time played of more than 20 per cent was the next most common response (14 per cent).

Analysis based on risk profile shows that 68 per cent of high-risk gamblers reported ‘no change’ to the time spent playing pokies.

Figure 15.7 Impact of using YourPlay on how much time respondent spent playing gaming machines

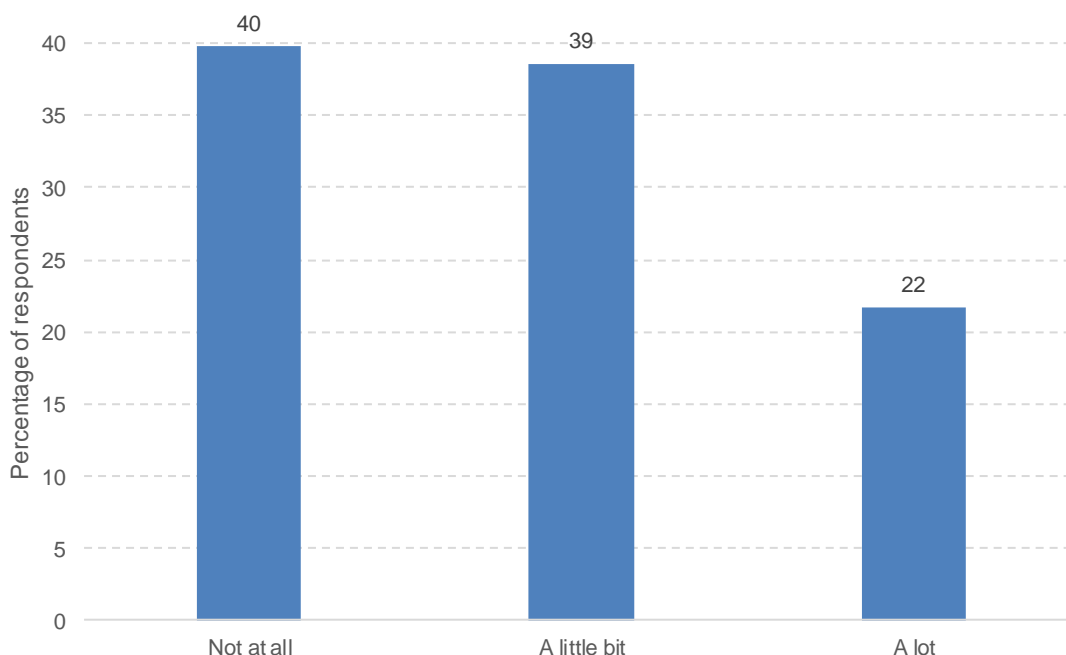


n = 83 respondents

Stopping gambling sessions

When respondents were asked to what extent YourPlay helped them stop their gambling session at the time of their choosing 40 per cent said ‘not at all’, 39 per cent said ‘a little bit’ and 22 per cent said that YourPlay has ‘helped them a lot’ to stop gambling when they wanted to (Figure 15.8).

Figure 15.8 Extent to which using YourPlay helped the respondent to stop gambling at their preferred time



n = 83 respondents

Survey respondents were asked two open ended questions on features of YourPlay that they found most useful and least useful. Table 15.1 summarises their responses. Generally the most useful features identified was the ability to track time and/or money. Other features identified by multiple respondents as being most useful features included the ability to set limits and receiving reminders or pop-up messages.

There were no particular feature(s) that were commonly identified as being least useful, with a range of features instead being identified as least useful. Responses ranged from card readers not working, sign up process being difficult, pop ups requiring a PIN to keep working, being forced to view activity statements etc.

Table 15.1 Most and least useful features of YourPlay (open ended question)

Most useful	Least useful
All of them	Nothing
Tracking of time and money	Constant pop ups requiring PIN to keep playing very annoying
Setting limits	Card readers break down when you forget to remove the card
Onscreen reminders	Unreliability of using the card at the machines
Access to more information	It is easy to forget to bring card
Bonuses, use of loyalty part of card, free rewards, free coffee and wine, access to restricted areas	Your Spin Feature
Nothing	Signup procedure was unnecessarily difficult.
	Most, find it a little invasive to a point
	Waiting time for cards
	Forced to view activity statements rather than it being a choice

16. Evidence for Impact in YourPlay Data

As an alternative approach to identifying the potential impact of YourPlay on its users we have undertaken regression analysis of gambling sessions undertaken whilst using a YourPlay card to test whether, over time, gambler's behaviours during the session change. Regression analysis allows the potential impact of a number of potential explanatory variables (such as venue type, month and number of previous sessions) on the variable of interest – in this case turnover per gaming session for YourPlay users – to be tested jointly.

There are a number of limitations to this type of analysis, largely due to the voluntary nature of the scheme, the fact that most cards are anonymous and so demographic information on the player is not available for most sessions, and the scheme's low usage rates. Another important gap is that it is not possible to know what a player is doing in gambling sessions where they do not use the YourPlay card, or which they continue after they remove the card. For example, if a gambler found the pop-up notifications of spend during the session more annoying over time (or became more conscious to avoid them as they made it harder to deny that the gambler's patterns of expenditure were problematic) then they might start removing the card earlier in the session over time, which would be falsely coded as a success for the scheme.

Two potential benefits of the scheme were tested, first whether gambler's turnover falls after having used YourPlay for a number of previous sessions (this would indicate that they were using the expenditure data to better manage their expenditure based on their own preferences); and whether the ratio of turnover to net gaming revenue changes with use of the scheme (this type of benefit was observed in the Nova Scotia scheme whilst it was operating, and indicated that through identifying those patterns of gambling behaviour most likely to lead to excess rates of loss such as chasing losses, or reinvesting winnings some gamblers were able to achieve a longer period of gambling for the same expenditure). (Focal Research, 2007).

Other forms of benefit observed in gamblers using the Nova Scotia pre-commitment system, such as increased cash out rates could not be assessed in Victoria as the Melbourne Casino does not report this data on sessions that take place in the casino.

In these analyses the "learning" variable is the total number of sessions a player has had up to that point, e.g. the second time a card is used the session count is coded as 2, the tenth time as 10 etc. If players are indeed learning from the information available through YourPlay then it would be expected that, all other things being equal, expenditure would fall as the session count increases.

It may not be the case that the influence of the session count is purely linear. For example it could be that the first set of sessions provides a gambler with information that allows them to better manage their gambling to fit in with their budget and preferences, and after that the gambling behaviour settles in to a new equilibrium with additional sessions producing little or no change in expenditure. In order to allow for the potential for non-linear impacts of session counts, the variable was included in the analysis as a quadratic. This allows the impact of the explanatory variable to take a number of potential non-linear forms, including the classic exponential curve (increasing at an increasing rate over time), a concave form where the rate of increase slows over time; a u shaped curve where the impact initially falls and then increases; and an inverted U curve where the impact increases up to a point and then begins to decrease.

The impact of the various potential explanatory variables on turnover per session is set out in Table 16.1. The overall explanatory power of the model was low, capturing around 8 per cent of the variation in turnover between sessions. This indicates that the most significant explanatory variables are the specific characteristics of the individual gamblers, which could not be included in this analysis as they are not systematically collected.

Sessions undertaken at clubs and hotels both reduce expected turnover in the session all other things being equal, as do sessions in which a limit has not been set.

Expenditure in sessions undertaken after July 2017 tends to be lower than sessions undertaken in or before July 2017 all other things being equal.

Finally on the potential indicator of outcome, the session count for a player (e.g. the number of sessions they have had up to and including the current session) is negative with the squared term positive. This suggests that the impact will not be consistent across the observed number of sessions in the dataset.

Figure 16.1 illustrates the combined impact of session count on turnover over the range of session counts present in the analysis dataset (1 to 8,210). It can be seen that the impact is a u shaped curve, with the greatest impact on turnover reached at between 3,755 and 3,763 sessions, when the impact of the session count all other factors being equal is to reduce turnover in the session by -\$1,554.03.

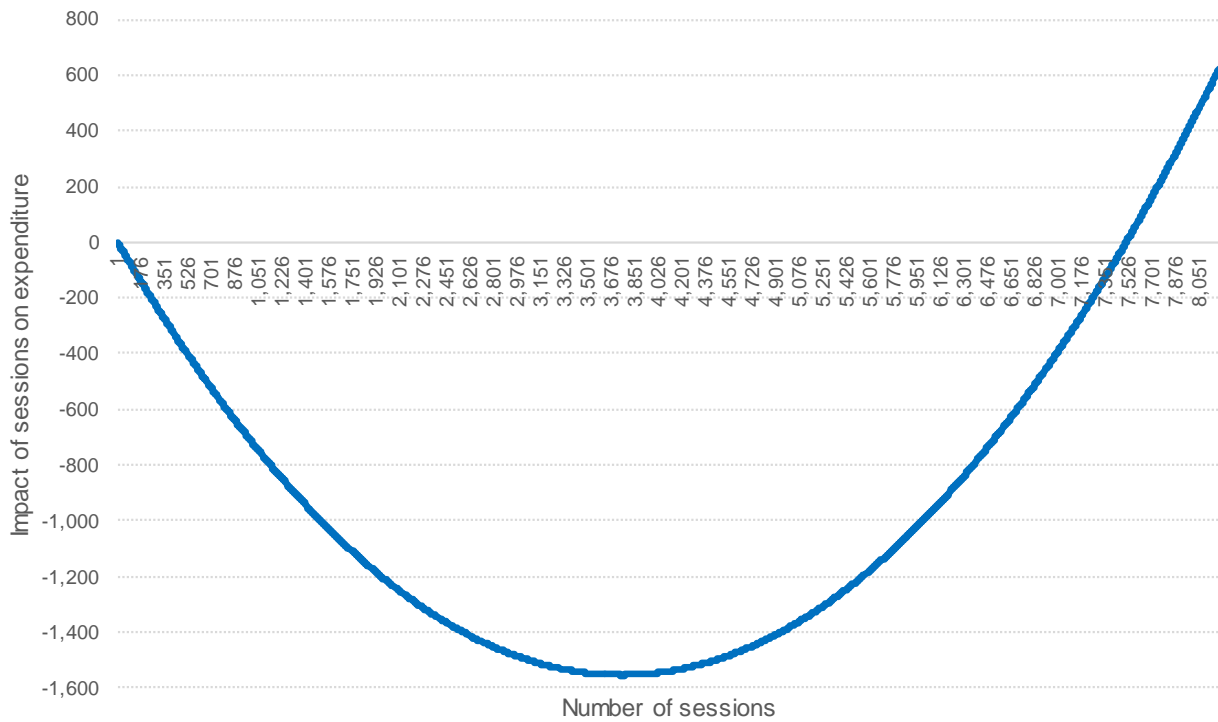
If the session count variable is set at its median value (252) the session count reduces expected turnover by -\$201.40 all other things being equal. If the session count variable is set at its average value (490.8), the session count reduces expected turnover in the session by -\$378.85.

Table 16.1 Regression results for model of turnover per session

Variable	Coefficient	Std. Err.	t-stat	P>t
Intercept	2404.054	23.77	101.14	0.0000
Session count by player	-0.827	0.01	-74.28	0.0000
Session count by player	0.000 ^a	0.00	37.70	0.0000
Venue Type (relative to casino)				
Club	-539.100	79.89	-6.75	0.0000
Hotel	-418.353	89.61	-4.67	0.0000
Month (relative to December 2015)				
Jan-16	50.463	33.28	1.52	0.1290
Feb-16	427.492	34.97	12.23	0.0000
Mar-16	-37.205	33.66	-1.11	0.2690
Apr-16	247.867	33.35	7.43	0.0000
May-16	1.532	33.68	0.05	0.9640
Jun-16	178.235	33.68	5.29	0.0000
Jul-16	-17.208	33.14	-0.52	0.6040
Aug-16	94.062	33.22	2.83	0.0050
Sep-16	511.942	32.77	15.62	0.0000
Oct-16	511.842	32.87	15.57	0.0000
Nov-16	154.217	33.16	4.65	0.0000
Dec-16	-48.003	32.71	-1.47	0.1420
Jan-17	-41.805	32.42	-1.29	0.1970
Feb-17	536.470	33.80	15.87	0.0000
Mar-17	-77.358	33.07	-2.34	0.0190
Apr-17	-30.632	32.72	-0.94	0.3490
May-17	269.780	33.12	8.15	0.0000
Jun-17	470.907	33.35	14.12	0.0000
Jul-17	430.985	32.91	13.09	0.0000
Aug-17	-271.031	32.77	-8.27	0.0000
Sep-17	-925.582	33.06	-28.00	0.0000
Oct-17	-820.755	32.48	-25.27	0.0000
Nov-17	-700.530	32.92	-21.28	0.0000
Dec-17	-938.058	32.46	-28.90	0.0000
Jan-18	-913.261	31.99	-28.55	0.0000
Feb-18	-836.247	33.32	-25.09	0.0000
Mar-18	-920.512	32.67	-28.17	0.0000
Apr-18	-943.099	33.00	-28.58	0.0000
May-18	-886.605	32.92	-26.93	0.0000
Jun-18	-912.959	32.87	-27.78	0.0000
Jul-18	-1,077.121	32.96	-32.68	0.0000
Aug-18	-1,005.187	32.62	-30.81	0.0000
Sep-18	-991.411	33.09	-29.96	0.0000
Oct-18	-729.404	32.58	-22.39	0.0000
Nov-18	-902.149	32.87	-27.45	0.0000
Dec-18	-1,269.472	32.31	-39.28	0.0000
Limit Type (relative to daily loss limit)				
Weekly Loss Limit	25.254	34.00	0.74	0.4580
No Limits Set	-1,561.456	53.64	-29.11	0.0000
Limit value	0.000 ^b	0.00	64.75	0.0000

Note: ^a the coefficient value for 'session count by player²' is 0.00011
^b the coefficient value for 'Limit value' is 0.0000139

Figure 16.1 Combined impact of session count and session count2 on expected turnover holding other variables constant, assessed over the observed range of session counts



There was no statistically significant relationship between use of YourPlay and change over time to the ratio of turnover to net gaming revenue, suggesting that this form of benefit has not occurred for YourPlay users (or has not occurred at a level where it can be identified using statistical analysis). It is not possible to identify whether this benefit could be expected to emerge over time, or whether it will not occur for YourPlay users.

17. Cost Effectiveness Analysis

17.1 Treatment of benefits from YourPlay

The approach to benefits is slightly more difficult than normal for this evaluation as the scheme is targeting two broad types of outcomes. Accordingly, the costs need to be allocated between the two broad outcome types in some way. There is no strong a-priori reason to use any particular weighting and so any choice is in some sense arbitrary. In the evaluation planning process in consultation with the Department it was decided to draw on the Benefits Realisation Plan developed for the scheme (p. 16) and allocate 6/7ths of the costs to outcomes around “better informed decisions” (e.g. consumer protection) and 1/7th to outcomes around reduced harms to self and others reflecting the scheme’s primary focus on consumer protection.

Originally the planned definitions for these outcomes was:

- consumer protection: the proportion of total expenditure where the gambler made use of the scheme to manage their gambling, defined as the proportion of YourPlay cardholders who report that they have either used the expenditure tracking system to manage their gambling, or who have set a limit to help manage their gambling (with these two indicators expected to be able to be sourced from the telephone survey of gaming machine gamblers).
- reduced harms to self and others: the number of gamblers using the pre-commitment scheme to manage their gambling whose welfare increases relative to non-users will be used as the indicator in the fall in harm (if this change is statistically significant).

These approaches to defining outcomes proved not to be feasible in practice, as the telephone surveys identified almost no users of YourPlay cards thus precluding their use in identifying benefits.

However, the survey of YourPlay cardholders did provide an estimate of the proportion of YourPlay cardholders who reported that they were better informed about their gambling expenditure and the proportion who reported that using YourPlay had helped them to stop gambling when they had reached the limits they had set themselves. These estimates will be combined with data on the number of active cardholders to derive estimates of the number of persons receiving consumer protection and harm reduction benefits.

Whilst this is the best available data on the share of YourPlay cardholders who benefited from YourPlay, as noted earlier it is not possible to identify whether or not the survey respondents are representative of the broader population of cardholders.

17.2 Cost of YourPlay

Data on the key cost parameters was provided by Liquor and Gaming, and these have been allocated across the first five years of the Scheme’s operations by SACES. This is detailed in Table 17.1.

The most significant cost is the pre-commitment system fee payable by venues to Intralot Gaming Services. This fee was initially \$0.745 per gaming machine entitlement per day (assuming 28,700 active machine entitlements) and from August 2016 it is indexed annually based on the change in CPI. This fee is only payable from 1 December 2015 when the system went live.

The cost of card readers for gaming machines is estimated by OLG to be \$1,500 each, and one is required for each of the 27,372 active machines. Costs were not included for machines installed in venues that would have had a venue loyalty system even if YourPlay had not been launched, as these venues would have had to purchase card readers anyway. Excluded venues are Melbourne Casino, venues owned by ALH Group and RSLs. For other venues cost is included as depreciation over the estimated five year effective life using a straight line depreciation approach.

A similar approach was adopted for venue kiosks, with an estimated unit cost of \$2,500 and an estimated 600 installed in venues. It was assumed that the venues excluded from this part of the cost calculation had the same share of kiosks as gaming machines with that proportion of costs excluded.

Costs of staff time for undertaking the on-line training on YourPlay could not be quantified as Intralot does not collect data on the number of persons using the training.

Drawing together all of the included cost items suggests that the present value of costs in 2014/15 values over the five years is \$57.1 million (from total current price costs of \$67.2 million). The majority of these costs (with a present value of \$49.7 million) are borne by industry, largely through the pre-commitment system fee and the cost of card readers.

Table 17.1 Estimated costs of YourPlay

Incidence of cost	cost item	2014/15	2015/16	2016/17	2017/18	2018/19
Costs to Victorian Government	Victorian Government staff costs for implementation of YourPlay	1,300,000.00	1,040,000.00	210,000.00	210,000.00	215,250.00
	Cost of 'software'	45,000.00	25,000.00	15,000.00	7,000.00	7,176.58
	Communication strategy	1,500,000.00	500,000.00			
	Evaluation	155,064.03	77,720.65	208,515.96	209,848.04	270,535.06
	YourPlay Days			45,000.00	90,000.00	45,000.00
	Total cost to government	3,000,064.03	1,642,720.65	433,515.96	426,848.04	492,961.64
Costs to gaming industry	Pre-commitment system fee	4,532,878.00	7,804,247.50	7,978,146.33	8,157,799.39	8,360,428.97
	Cost of card readers, net of card readers that would have been installed anyway (depreciation)	4,171,365.00	4,171,365.00	4,171,365.00	4,171,365.00	4,171,365.00
	Cost of kiosks, net of kiosks that would have been installed anyway (depreciation)	190,787.46	190,787.46	190,787.46	190,787.46	190,787.46
	Costs of staff training (delivered by venue support workers)	0.00	36,398.32	37,633.44	38,932.14	0.00
	Costs of staff training (on-line)	nq	nq	nq	nq	nq
	Costs of registering players (staff time)	0.00	5,152.01	25,401.92	22,715.47	27,094.13
	Total cost to gaming industry	8,895,030.46	12,207,950.29	12,403,334.15	12,581,599.46	12,749,675.56
Costs to gamblers	Costs of registering (value of time)	0.00	5,152.01	25,401.92	22,715.47	27,094.13
	Costs of inserting card and entering PIN (value of time)	0.00	53,622.88	671,686.16	741,997.55	791,747.74
	Total cost to gamblers	0.00	58,774.90	697,088.08	764,713.03	818,841.87
TOTAL QUANTIFIABLE COST TO VICTORIA	CURRENT PRICES	11,895,094.49	13,909,445.84	13,533,938.19	13,773,160.52	14,061,479.07
	NET PRESENT VALUE OVER 5 YEARS (2014/15 values)	57,140,856.19				

Note: Net present value calculated using a 7 per cent real discount rate

17.3 Cost effectiveness of achieving consumer protection benefits

Taking the conservative approach of assuming that those survey respondents who did not complete the impact section of the questionnaire received no benefits from the scheme, twenty three per cent of respondents reported that YourPlay meant they were “a great deal” or “quite a lot” better informed about their gaming machine spending.

To the extent that our survey of cardholders is representative of the broader population of YourPlay card users then this is a reasonable estimate of the proportion of cardholders who realise consumer protection benefits. Table 17.2 details the estimated number of gamblers expected to experience this type of benefit and its cost effectiveness.

Applying the weighting from the benefit realisation plan suggests that in net present value (NPV) terms \$49.0 million in costs should be allocated to the consumer protection benefits.

This gives an average cost effectiveness over the four years of \$3,943 per gambler who is better informed about their spending. Whilst the most significant factor in this unit cost is the low usage, it is also pushed up by the allocation of a large proportion of costs to consumer protection given that consumer protection was the main focus of the scheme as designed.

Whilst there is not a direct comparator available for this cost per unit outcome it appears to be extremely high for a benefit based around improved information on spending.

Table 17.2 Estimated cost effectiveness of consumer protection benefit

	2015/16	2016/17	2017/18	2018/19
Estimated gamblers better informed about expenditure	2,168	3,341	3,337	3,576
Total over 5 years	12,423			
NPV of costs allocated to consumer protection (\$)	48,977,877			
Cost per gambler better informed about spending (\$)	3,943			

17.4 Cost effectiveness of achieving harm reduction benefits

Again taking the conservative approach of assuming that those survey respondents who did not complete the impact section of the questionnaire received no benefits from the scheme, and that harm reduction benefits are only realised by those whose gambling risk is categorised as ‘problem gambling’ or ‘moderate risk gambling’, then 13 per cent of our survey sample experienced a harm reduction benefit in terms of being assisted to stop gambling when they chose.

To the extent that our survey of cardholders is representative of the broader population of YourPlay card users (and whilst the risk levels are not representative of gaming machine gamblers in Victoria as a whole, they are in terms of weekly gamblers who represent the population most likely to use YourPlay) then this is a reasonable estimate of the proportion of cardholders who realise harm reduction benefits. Table 17.3 details the estimated number of gamblers who would be expected to receive at least some reduction in harms to themselves or to others, and the cost effectiveness of achieving this benefit.

Applying the weighting from the benefit realisation plan suggests that in NPV terms \$8.2 million in costs should be allocated to the harm reduction benefits.

This gives an average cost effectiveness over the four years of \$1,163 per gambler who realises at least some reduction in the harm to themselves or others from gambling.

Table 17.3 Estimated cost effectiveness of reduced harm to self and others

	2015/16	2016/17	2017/18	2018/19
Estimated gamblers better able to stop gambling at the time of their choosing	1,225	1,889	1,886	2,021
Total over 5 years	7,022			
NPV of costs allocated to harm reduction (\$)	8,162,979			
Cost per gambler experiencing reduced harm to themselves or others (\$)	1,163			

Given the scale of expenditure reductions reported by our sample (an average of around \$1,960) this unit cost appears to be roughly in line with the expected benefits.

18. Implications and Conclusion

The available evidence suggests that those gamblers using YourPlay cards are achieving reasonable rates of benefits in terms of both consumer protection (23 to 28 per cent report being more aware of their expenditure) and harm reduction (24 to 29 per cent of survey respondents reported that YourPlay made it easier to stick to the limits they set for themselves, and 22 per cent of survey respondents reported that YourPlay helped them “a lot” to stop gambling when they wanted to, including 13 per cent of problem gamblers and moderate risk gamblers). These survey responses were supported by analysis of the YourPlay sessions data which showed that as the number of sessions using YourPlay increased turnover per session fell (up to a limit, see Table 16.1).

However, usage of YourPlay is very low, even allowing for the fact that usage was expected to be low given the voluntary nature of the scheme, and that venue based loyalty cards were uncommon in Victoria (outside of the Melbourne Casino).

Under the current usage rates YourPlay has a poor cost effectiveness.

International experience of usage rates for voluntary responsible gambling measures suggests that usage in the range of 1 per cent to 5 per cent of gaming machine gamblers should have been achievable (Gainsbury et al. 2018 report usage rates for various voluntary schemes of 0.8 per cent, 1.2 per cent and 13 per cent). However outside of the Melbourne Casino usage was not even close to this.

Usage is also highly variable between hotels and clubs, with a small group able to achieve almost acceptable usage for a voluntary scheme (0.5 per cent to 1 per cent of turnover in the venue spent by those using YourPlay), but the overwhelming majority of hotels and clubs have either no YourPlay use or almost no YourPlay use in a typical month.

The mystery shopping visits clearly show that non-compliance with the regulations around promoting and assisting gamblers to join YourPlay were extremely widespread, with an overwhelming majority of venues visited unable to successfully sign gamblers up to YourPlay and then have the card work in the venue with the requested limit set.

There was a wide variety of causes for the non-compliance ranging from poor staff training, through to poor quality equipment (e.g. in 22 of the 157 visits failed due to equipment issues/failure were identified as the cause, with a further 19 of the visits failing due to staff reporting that either the system was down or the internet was down²⁷). However there were also cases where venues appeared to have established policies that were in clear contravention of the scheme’s regulations such as only assisting gamblers to join YourPlay if they also joined the venue’s loyalty scheme, or requiring ID for casual user cards. Twelve of the visits failed because staff refused to join the researcher to YourPlay, and a further 24 failed due to venues demanding excessive identification (including six cases where the proof of address and identity demanded was more stringent for YourPlay than for joining the venue’s loyalty scheme).

This suggests that the low usage of YourPlay is being driven to a significant degree by lack of engagement (whether advertent or inadvertent) on the part of venues, their managers and their staff.

Recommendation 23: Develop options to better incentivise use by gamblers and venues.

If usage is to be brought up to levels such that YourPlay will have impacts consistent with its costs then the incentives facing venues need to be changed, and/or gamblers need to be given more incentive to use YourPlay. Four broad approaches that our analysis suggests have the potential to be effective in driving up use, if properly implemented, are:

- 1) A **compliance based regime** to ensure venue obligations are being met. This would involve regular, intensive compliance based visits from VCGLR inspectors to hotels and clubs to test compliance with the regulations, including staff knowledge and equipment functionality. Importantly these visits will only be effective if the VCGLR imposes the statutory penalties for non-compliance, rather than the use of other tools such as a letter of censure. It is likely that VCGLR would require a significant increase in resources to deliver this type of compliance approach, which should be funded through a mix of penalty income and user pays levies on venues (skewed towards the lowest performers).

²⁷ The researchers were not able to verify whether this explanation was correct.

It is also likely to be the case that ‘mystery shopping’ type visits would be required to test venue practices around willingness to sign gamblers up to YourPlay, offering YourPlay when gamblers are joining YourPlay, complying with regulations around access to casual cards etc.

- 2) Imposing **financial penalties on low use venues**, through an additional gaming tax imposed on the difference between 1 per cent of their gaming turnover and their actual level of turnover spent through YourPlay. This additional revenue could be directed to harm minimisation measures to compensate for the lost benefits arising from low usage of YourPlay.
- 3) **Provide incentives for gaming machine gamblers to use YourPlay.** The design of any incentive scheme aimed at gamblers would need to be carefully designed to ensure that in promoting the use of YourPlay it did not inadvertently promote gambling. One possible approach that could be investigated would be to link the incentive to YourPlay users accessing their account to view their activity statement either in a venue kiosk or on-line, with those who do so at least once in a quarter eligible for a random prize draw for a supermarket voucher or similar non-gambling incentive.
- 4) **Introduce additional harm minimisation measures for those gamblers who choose not to use YourPlay.** This would maintain the schemes current entirely voluntary nature, whilst ensuring that all gaming machine gamblers in hotels and clubs are provided with additional consumer protection and harm minimisation measures, whether or not they make use of YourPlay.

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Appendix A

Previous Evaluations of Pre-commitment Systems

A.1 Worldsmart evaluation (South Australia)

The Worldsmart pre-commitment system (Playsmart) operates in conjunction with the J-card loyalty system and is presently available in over 70 venues in South Australia (although it was trialled in a smaller number of venues in 2008-2009). This system allows players who use loyalty cards to set time or monetary limits, program time-outs or exclusions or personal reminder messages. The Schottler (2010) evaluation of Worldsmart extended over approximately 18-months and involved a number of different phases. In Phase 1, the features were available in venues, promoted by signage, and the natural uptake or usage was observed. For Phase 2, players were actively recruited by venue staff to take part in the research and were offered financial incentives to do so. In Phase 3, a random selection of J-card users were sent messages that appeared on the card readers.

The evaluation used a mixed methodology approach, including analysis of system data recorded by the Worldsmart database, quantitative surveys of players, focus groups with gamblers, venue staff and industry people; and, a usability trial. Each of these different components as well as the phases of the evaluation are described in separate chapters, although the findings relating to Phase 1 and 2 were generally combined because the two phases mainly differed in relation to how participants were recruited. Schottler Consulting experienced considerable difficulties in obtaining a sufficient panel sample to conduct research. Although 258 people used Playsmart during the trial (mean days of usage = 19, range 12-92 days), only 91 respondents were recruited. The resultant sample was mostly female (85 per cent) and 71 per cent were middle-aged (46-64 years) suggesting that the sample was not representative of the general population of gaming machine gamblers in the community (e.g. Department of Families and Communities, 2006).

Self-report survey

These 91 people were contacted by telephone and asked to respond to a brief CATI interview that asked them to indicate their awareness of the features, their views about the features, whether they had used them and whether they were effective.

Analysis of the awareness questions showed that 31 per cent did not appear to understand the purpose of Playsmart, 18 per cent talked about monetary limits and 16 per cent indicated that there were reminders if limits were exceeded. When asked to specify if Playsmart had any benefits, 34 per cent could name no benefits, 19 per cent indicated that it helped them to set limits and 15 per cent said that it made them more aware of their expenditure.

Other questions asked players to indicate whether certain features were useful for their *own* gambling. The most useful features were the ability to set limits on money (68 per cent), to pre-set pokie limits (58 per cent) and to be able to set one's own personalised message (56 per cent). Problem gamblers (on PGSI) were generally more likely to consider the ability to set one's own limits on the amount of money spent as more useful than other gamblers.

A number of questions concerning players' responses to the features were also included in the survey. In relation to the limits set, **61 per cent of players set limits higher or more lenient than the amount that they usually spent**, and only 17 per cent set lower limits. Sixty-three per cent set their own limits and only 18 per cent asked staff to set a limit for them (20 per cent could not recall). **The preferred limit duration was daily (37 per cent) or monthly (23 per cent) and 69 per cent of people chose a monetary spending limit. Only 5 per cent chose time limits, and 16 per cent selected breaks in play. Many people set very high spending limits with some as high as \$1,000 per week.** Only 17 per cent of respondents were able to recall their limit when asked over the telephone.

When asked whether these limit-setting functions had been useful, players were generally equivocal. For example, of the 16 problem gamblers identified: 6 reported no impact; 6 reported greater awareness of their expenditure; and only 1 of the 16 reported a reduction in expenditure. Despite this, gamblers in general (across all risk levels) indicated that the system made them reflect more on their gambling expenditure and poker machine play (60 per cent). When asked if the system had any impact on the amount of gambling, 80 per cent indicated that it had no impact on the amount of time spent gambling and 71 per cent indicated that it had no impact on their expenditure. Respondents were further asked whether the technology should be mandatory or voluntary. Twenty-nine per cent indicated that they would prefer a compulsory system and 59 per cent wanted it to be optional, although problem gamblers were more likely to think that a compulsory system would be more effective (50 per cent vs. 17 per cent of non-problem gamblers). On the whole, higher risk gamblers

preferred gaming with Playsmart, but 52 per cent of problem gamblers and 36 per cent of moderate-risk gamblers did not see any difference in their gambling as a result of using it.

The evaluation also examined how people responded to messages. The results showed that only 26 per cent of players recalled having received any reminder messages for exceeding a limit, 70 per cent did not receive any breaks in play, 64 per cent did not obtain a spend limit reminder, and 96 per cent did not trigger a time-limit reminder.

Analysis of System Data

Worldsmart maintains a detailed SQL-database containing every session of gambling on every machine. Therefore, it is possible to determine the details of how long and how much people gambled in any day or session.

The analysis of these data yielded findings that were generally consistent with the self-report data. Fifty-six per cent of the respondents had selected daily limits and 20 per cent chose daily spend limits, but these were often quite large (\$500 per day). Seventy per cent of the sample did not change their limits once they had been established.

Analysis of limit breaches showed that players continued beyond their monetary expenditure limits approximately 1.5 times per player and 33 per cent breached their time-limit limits. On the whole, moderate risk and problem gamblers set higher limits than other players (\$249.30 for problem gamblers and \$332.80 for moderate risk gamblers vs. \$210 for low risk and \$160 for no risk gamblers). Twenty-seven per cent of problem gamblers and 25 per cent of moderate-risk gamblers increased their limit during the trial at least once, or, took it off and never used it again as compared with 8 per cent of non-problem gamblers. Problem gamblers were more likely to breach their limits by larger amounts, although it is acknowledged that this difference could be understated because non-problem gamblers set more conservative (lower) limits which could have been more easily breached.

Focus group findings

A number of focus groups were conducted with both players and venue staff. The principal aim of this qualitative work was to obtain feedback concerning the functionality of the system, the principles of pre-commitment and barriers and facilitators to use. Players generally did not like time-limits because they did not like to stop when they were winning and wanted flexibility of being able to stop for drinks and to talk with their friends without reducing their play time. Some players pulled out their card if they reached their limit and continued to gamble without it.

Industry respondents were generally sceptical about the viability of pre-commitment systems. They argued that people did not like to be monitored and controlled. Most of those who chose to use the system tended to be lower risk players (mostly middle-aged women) rather than the higher risk younger players. Players also were confused by the range of pre-commitment options. Most importantly, there were very few people who felt that they needed any of the features because their gambling was perceived to be under control.

Messaging trial

The aim of Phase 3 of the project was to determine whether messages of this nature are noticed by players and whether they influence people's likelihood to adopt the pre-commitment features and whether it influenced their gambling. In total 509 players were exposed to the messages and a telephone survey was conducted with 78 consenting players to determine their reactions. Of this 78, only 32 reported being aware of the messages and only 10 out of 32 of these people correctly identified what the messages were about, although most got it correct when prompted. Most of those who had been aware of the message (81 per cent) indicated that it had 'encouraged [them] to keep within their pokies spend limit' and 76 per cent said that they had been 'more careful with their pokies expenditure'. Fifty-one per cent of the 78 had expressed an interest in enquiring about Playsmart.

Interestingly, there was some evidence that players exposed to messages reduced their expenditure relative to those who did not receive them. This suggested that making people more self-aware of their behaviour appeared to be a useful way to encourage modest changes in behaviour.

Summary of findings

The Schottler Consulting (2010) evaluation suggested that pre-commitment technology generally works well. Players find it relatively easy to use and most players do not report any loss of enjoyment of gambling. The principal difficulty is that few people adopted the technology and used it for any sustained period. Those who used the features tended to like the ability to set messages, regard setting monetary limits as more useful than

time-based limits, but many set limits that were so high that they would have little likelihood of influencing their play.

A.2 Maxetag trial (South Australia)

The Maxetag trial was conducted in Adelaide at two venues. Maxetag is a radio-frequency device or tag that forms the basis for loyalty systems at a number of hotels and clubs. The budget-setting system takes the form of a console mounted just above the display screens on gaming machines. Players set budgets by pressing an activation button. Daily budgets are then obtained by incrementing a balance which displays on a small digital display screen next to the machine. This limit can be set at any time and applies until midnight on the day of activation.

The principal focus of this trial was to examine the factors that influence the uptake of this feature: these include the nature of promotional material in the venue, voice-overs, and staff interactions with patrons. The evaluation used a variety of data sources, including: analysis of objective system data; key informant interviews with venue staff and a task analysis. The system data indicated how often people tagged on with their Maxetag and chose to utilise the budget-setting feature; how often they pressed 'Yes' or 'No' in relation to budget-setting; how much they set as their budget and whether they exceeded their budget. The focus group with venue staff examined staff perceptions of the feature, its value to players, issues associated with patron recruitment, and the costs of implementation. As described earlier, the final task analysis asked gaming machine gamblers who were unfamiliar with Maxetag to utilise the feature and provide feedback concerning its usability and potential effectiveness.

The results showed that very few people were willing to set budgets using the Maxetag feature. Only 1.8 per cent of patrons set a budget at least once at the most active venue. Around half of the occasions that a budget was set, it was exceeded. Of those who exceeded a budget at either of the venues ($n = 9$), most ($n = 6$) did not use the budget setting feature again. Two players maintained approximately the same budget amount and another player increased the amount. Ten players set a budget more than once. Discussions with staff indicated that patrons were reluctant to use the feature because they did not feel that they had a problem with their gambling. Some were also worried about what would happen if they did impose some sort of limit on their behaviour. The task analysis showed that many players were confused about the display balance and what is meant (e.g. how winnings and the amount already credited on the machine were combined to indicate their remaining budget).

Overall, the results showed that the natural uptake of the budget-setting was very low and that there is little likelihood of people using features of this nature unless they are encouraged by venue staff.

A.3 Queensland trials

Two smaller pre-commitment trials were conducted in Queensland. The first involved the eBet system at the Sandgate RSL with the assistance of technology supplier (Odyssey). The other trial, conducted at the Redcliffe RSL, used the Simplay system developed with Maxgaming.

The eBet trial was designed to examine the uptake of cashless gambling and responsiveness of pre-commitment features. The study involved a CATI survey of players ($n = 22$), system data collected over a 6 month period and focus groups with players and staff. The results showed that 66 people (or 5 per cent of the player population) opted in to cashless gaming and around 28 per cent chose to set a daily spending limit (i.e. around $.28 \times 5$ per cent = just over 1 per cent of the total player population).

Those who used the eBet system generally liked it. For example, 60 per cent said that it encouraged them to think about their expenditure and these players decreased their expenditure around 40 per cent during the trial period, whereas those users who did not set limits decreased their expenditure by 3 per cent. Respondents expressed positive views about the player activity statements. When asked about how the card or cashless-gaming system should be implemented, 68 per cent preferred a voluntary system, 27 per cent said it should be mandatory and 5 per cent did not believe that it should be adopted. The Productivity Commission (2010) warns, however, that the views of these people may not be necessarily representative of other gamblers in the community. Apart from the fact that the data were obtained from only one venue, the participants may not have been the same as those who failed to volunteer. As was found in the Worldsmart evaluation, many of these players could have been lower risk gamblers (e.g. middle-aged women) who are more willing to cooperate in the venue, but who are not necessarily most likely to be at risk of gambling-related problems. The trial ran for 6 months, but it was notable that 90 per cent of the 66 participants were recruited in the first 3 months. Only 7 people were recruited thereafter. These trends were very similar to those observed in the Worldsmart trial.

The Maxgaming Simplay trial was conducted using a similar methodology. Letters were sent out to club members inviting them to sign on and try the technology. An incentive of \$20 in Simplay bonus points was offered. The trial ran for 8 months and, 340 people agreed to use the cashless gaming system. As in the eBet trial, most recruitment occurred in the early months: 45 per cent of people were recruited in the first month, another 34 per cent in the next 3 months and 21 per cent in the last 4 months. Of those who signed up, only 45 of the 340 people (13 per cent) set a daily spending limit and two-thirds of people who did this, exceeded it on at least one occasion. There was some evidence that those who adopted the expenditure limits spent less during the trial period but there was no pre-post data available for comparisons and no robust comparison groups to validate these findings. Once again, most people found the system easy to use and the technology worked well, but many people did not feel that it was relevant to them or had no interest in trying it (Productivity Commission, 2010).

A.4 Nova Scotia trial (Canada)

The Nova Scotia trial of pre-commitment was part of a longer-term responsible gambling strategy implemented by the Canadian Province of Nova Scotia during the last decade. With the assistance of the Nova Scotia Gaming Corporation, technology developed by a company called Techlink was developed to provide gamblers on gaming machines (Video Lottery Terminals, or VLTs) features that would enable them to monitor their gambling more carefully and allow them to pre-plan their gambling. The evaluation of the technology was conducted in a series of related studies that were done in Stages.

- *Stage 1* of the evaluation involved a usability trial conducted through the University of Nevada by Bernhard et al (2006). Players were recruited as a panel and their experiences were examined;
- *Stage 2* involved modifications to the card system and re-testing based on the results of Stage 1;
- *Stage 3* involved the issue of cards to all players in the relevant area and the requirement that people use VLTs cards only. The evaluation of this phase was undertaken by Omnifacts Bristol Research (2007) and this principally focused on the features that would encourage responsible play as perceived by players;
- *The Stage 4* research project involved further examination of the Stage 3 data by Focal Research (2007) who, in addition to self-report, conducted a detailed analysis of system data recorded by the Techlink system. Data in Stage 4 were drawn from newly recruited gamblers as well as those who had agreed to be involved as panel participants in Stage 3.

The main trial involved around 70 VLTs at 10 sites, but not all of these venues remained active during the course of the trial (Focal Research, 2007). In Stage 1 (Bernhard et al., 2006), the panel of players (n = 120) were signed up for cards and an algorithm created a unique user ID. Players activated machines by inserting their card and using a PIN. People could then choose if they wanted to activate any of the responsible gambling features on the machine. These features included a Live Action feature (which yielded the current session information), My Money Limit (the spend limit), My Play Limit (time limits or time outs), and the Stop Feature that provided a 48 hour time-out from VLT use.

Focus group findings (Bernhard et al., 2006 evaluation)

Interviews with gamblers revealed a number of insights into player responses to the features. Players were generally not in support of a mandatory system because this imposed too many controls on them, but accepted that they would probably adapt to the technology over time in the same way that people adapted to bank cards. Few players felt this type of system could be useful for problem gamblers because it was expected that players would work out ways to bypass the system. The 'My Account feature' was a useful way to monitor gambling expenditure, but people generally did not support time-based limits. Comparisons conducted across people who differed in relation to their level of gambling risk showed that low risk gamblers were mostly interested in the 'accounting features' (i.e. just keeping track of how much they were spending). Both moderate risk gamblers and problem gamblers perceived the potential utility of the features and expressed some intention to use them.

Survey findings

The findings from the quantitative component of the study mostly focused on people's usage of the different features. Fifty-one per cent reported using at least one responsible gambling feature at least once. A third of the sample (33.7 per cent) accessed My Account at least once, 34 per cent used Live Action, but use of the limit setting features was very low. Three per cent set a daily monetary limit at least once, 0.2 per cent set a weekly limit and 0.1 per cent set a monthly limit. In relation to the actual frequency of use, it was found that Live Action was used 2.5 times per week and My Account 1.63 times per week in comparison to a mean of 6.57 card inserts per week. Somewhat surprisingly, it was found that those who used the responsible gambling features played more frequently, had longer sessions and higher expenditures. This could be due to higher risk gamblers having found the responsible gambling features more useful or relevant than other players.

A second set of survey findings emerged in the report produced by Omnifacts Bristol Research (2007). In their part of the evaluation, survey data was drawn from a panel of 137 VLT players who were selected based on the fact that they gambled at least once per month on VLTs. These players were tracked over time during the course of the trial and invited to take part in both focus groups and quantitative surveys. Another data source was a community telephone survey conducted in the trial areas (n = 400). A third source was data recorded by the Techlink system. A fourth source was a series of intercept surveys at venues involving non-panellists. In total 1,918 cards were enrolled during the trial period, but analyses could only be conducted using 1,081 cards. Valid card data were available for 88 of the 137 players on the panel. The remainder were excluded because they lent their cards, borrowed cards, often gambled outside the trial area, or gambled when the system was not functioning.

A number of important findings emerged from these surveys. The first was that they revealed a high rate of card exchanging between players. The second was a gradual decrease in the amount of cash-in over time, but also declining use in the features. During the first period of tracking, 68 per cent of people used one or more features at least once, but this dropped to 51 per cent in the fourth period of tracking (approximately 6 months later). Over half of these players used the My Account Feature in period 1 and 36 per cent were using it in period 4. **Only 1 per cent used weekly limit features in the first period and this dropped to zero over time.** Daily limits were 14 per cent in period 1 and 0 per cent in period 4. Based on these findings, the authors concluded that, players prefer features that monitor their play over those that control their play.

Further analyses were undertaken to examine changes in spending patterns across time as compared with people's self-reported baseline expenditure. Among the 88 compliant panellists, it was found that 63 per cent had reduced their spending (defined as a 10 per cent+ reduction in playing vs. baseline self-report), 30 per cent had increased their cash-in amount and 7 per cent remained unchanged. When these people were interviewed, it was found that the 'decreasers' generally had more positive attitudes towards the responsible gambling features than the other groups. For example, 74 per cent believed that the features helped them set a budget (vs. 56 per cent of increasers); 98 per cent were more aware of how much they were playing (vs. 69 per cent of increasers), 80 per cent were more aware of the amount of time and money spent (vs. 62 per cent of increasers), and 85 per cent supported a mandatory system vs. 54 per cent of 'increasers'.

Another series of analyses divided people into high and low users of responsible gambling features. Medium to high users had utilised the features 10+ times and low users had used the features 10 or fewer times. There was no significant association between this classification (high vs. low user) and changes in expenditure (increase, decrease, no change). Medium to High users were more likely to report that they were spending less money using the self-report measures (65 per cent vs. 51 per cent of low users), were more aware of how much they were playing (80 per cent vs. 67 per cent), but low users were more likely to say that they found it easier to stick to a budget (79 per cent vs. 64 per cent for medium to high users). In other words, the evidence in relation to the level of feature use was somewhat contradictory and difficult to interpret. As part of these analyses, the researchers also examined the PGSI classifications of the 88 valid panellists from the start to the end of the trial. At the start, 15 had been classified as problem gamblers. There were 11 PGs at the end of the trial: 6 people who had been problem gamblers at the start and 5 who had moved into this category from the moderate risk category. Fifty-two per cent of people remained in the same PGSI category at the end of the trial, 34 per cent had dropped to a lower category and 14 per cent had moved into a higher PGSI category.

Other questions related to panellist players' attitudes towards the features. Most of these attitudes were positive. For example (examining data from the 2nd panel survey, n = 129):

- 85 per cent were more aware of how much they were spending on VLTs;
- 55 per cent rated the features as useful for them personally;
- 62 per cent said that the features encouraged them to play responsibly;
- 65 per cent said that the features helped them to stick to a budget;
- 57 per cent spent less money; and
- 53 per cent felt safer.

At the same time, when the researchers examined questions relating to personal relevance as opposed to perceived usefulness, the figures were somewhat lower. When asked about their overall evaluation of the card system, 81 per cent said they did not need responsible gambling features to set a limit in order to play responsibly; 30 per cent said they relied upon the features to help them make decisions about their playing, and 39 per cent said they had reduced chasing their losses since using the RGD features.

A final series of comparisons examined the views of panel participants, people interviewed in intercept surveys and those in the general community (telephone survey) in relation to their attitudes toward the imposition of a mandatory vs. voluntary card-based system in the areas. The two intercept surveys yielded support figures of 44 per cent and 31 per cent; two panel surveys yielded support figures of 74 per cent and 73 per cent; and 65 per cent of people in the general community survey supported card systems. The panellists also generally supported the idea that there should be a mandatory spending limit (61 per cent) and that there should be a mandatory upper limit that applies to all players (65 per cent). In addition, about half of people living in the general community who had visited venues were aware of the system and 33 per cent were aware of at least one feature. Sixty-five per cent felt it was a useful tool for people who might want to manage their play and 52 per cent said that it encouraged responsible play.

Summary and Conclusions

The conclusions of the Omnifacts Bristol Research (2007) report are generally positive, although similar to the findings reported in the Worldsmart trial in South Australia. It is clear that people have positive attitudes towards card systems and pre-commitment strategies and that technology functions well and does not impose burdens upon players. Players appeared more likely to reduce their expenditure during the trial than increase it (confirmed by an estimated 25 per cent drop in venue revenue during the period). At the same time, when one examines actual use of the features, it is clear that very few people used the limit setting functions, so that it does not appear that these features could have made a substantial difference to people's playing. Instead, it appears that the availability of software that allowed them to keep track of their expenditure when they wanted or merely the knowledge that controls were available, may have been sufficient to influence the behaviour of some players.

In contrast to the Stage 1 evaluation described by Bernhard et al. (2006) many more people in this survey tended to support a mandatory card system and saw its benefits and this may reflect the fact that greater familiarity and involvement with technology can foster more positive attitudes towards it. The only difficulty, however, is that many of the findings were obtained from a group of selected panellists who may not have been representative of problem gamblers in the community. As was the case in the Bernhard et al. (2006) evaluation report, these people may have been willing to take part in a research project of this nature because they were already contemplating changing their behaviour and involvement in the trial only reinforced a pattern of intended reduction in behaviour that they had been intending for some time. Panellists may also have been more amenable to use card technology in general than other players.

Analysis of system data

The third and final stage of the evaluation reports undertaken using the Nova Scotia data was undertaken by Focal Research (2007). This study focused mostly on system and some self-report data collected during a 6-month mandatory trial of card technology involving 51 VLTs in 9 sites. In this study, the researchers analysed the system usage recorded for 1,824 players on the database and also linked back some of these findings to background information collected about the panel of around 140 players utilised by Omnifacts Bristol Research (as described above).

The researchers treated all usage of a given card at a particular venue on one day as one session of gambling. To ensure that the players analysed were people who gambled a sufficient frequency for the card to be relevant to them, only people who played at least once per month during the six-month trial period were included in the analysis. The authors identified 871 players who had gambled at least 6 times. These people represented 93 per cent of the total gambling sessions undertaken during the trial period and generated 94 per cent of the revenue. The authors also differentiated between 'adopters' (people who had used at least 1 responsible gambling feature at least 3 times) and non-adopters (those who did not meet these criteria). There were 414 adopters or users of the RGD and the remainder were non-adopters. When the availability of pre and post data was taken into account, this left the researchers with 122 'testable adopters' (monthly gamblers who used RGD features and who had valid pre-post data) and 92 testable non-adopters (monthly gamblers who did NOT use RGD features and who had valid pre-post data).

Analysis of the data drawn from the 871 regular players showed that 71 per cent used at least one of the features: 59 per cent used the Live Action feature, 68 per cent used the My Account feature, but only 11 per cent set monetary day limits, 2 per cent used a time-out period, and 1.5 per cent set a daily time limit. Of those who tried any feature, 65 per cent continued to use it in at least one subsequent session. Those who adopted the RGD features (adopters) tended to play longer (89 minutes vs. 77 minutes for non-adopters), but achieved a higher cash out value and more winnings (wins - losses). It was also found that those who had 18+ sessions of play during the trial period tended to spend more money (cash-in) when they were using the RGD, but that they also won more possibly because they were more likely to stop when they were ahead. At the same time, there was some limited evidence for a slight downward trend in the amount of money spent by RGD adopters

as the trial progressed. Statistical modelling found that use of the RG features was associated with a reduction in expenditure once other factors (e.g. session length, payout rate on individual machines and amount won per session) had been taken into account as covariates. The authors concluded that “use of the RGD system appeared to have provided some players with assistance in achieving improved cash out rates.” (Focal Research, 2007, p. 57).

Similar analyses undertaken using just the testable adopters yielded comparable results. On the whole, this group had longer session durations, higher winnings per session, lower losses, and a significantly better percentage return (81 per cent vs. 69 per cent for non-adopters). Although not statistically significant, testable adopters increased their expenditure (cash-in) and duration of sessions as compared with their pre-test behaviour, but these differences could have been because of the better returns obtained during the post-test period that enabled them to gamble a lot longer. The more sessions people played, the higher the likely cash-in value. When net expenditure was considered, RG adopters were found to have spent significantly less during the trial than pre-test (testing at a 5 per cent level of significance).

Focal Research (2007) also made some attempt to determine whether the features had a differential effect on players classified in terms of their ‘level of risk’. To determine each person’s risk level, the researchers used members of Omnifacts Bristol’s panel sample (see above) to segment players into higher and lower risk groups. Although they admitted that there was not enough PGSI data to allow ideal comparisons between groups, they were “able to draw upon experience with analysis of other gambling machine databases and customize previous learning for use with this particular dataset.” (p. 31). Using PGSI data in the panel survey and matching this up with panel player expenditure patterns, they were able to determine what expenditure patterns in the larger data-set were indicative of higher and lower risk gambling. These higher and lower risk segments were then compared in relation to their use of RG features (as adopters or non-adopters). The results revealed that high risk gamblers were generally unaffected by the trial. Their pre and post data were relatively similar. On the other hand, there were some pre-post differences for the lower risk segment. Those who had adopted the RG technology in the low-risk segment tended to put more cash in, took more money out, played more money in general, won more, and played longer (94 minutes vs. 74 minutes). They also had a better return to player (85 per cent vs. 70 per cent). Few differences were observed amongst low risk players who had not adopted the RG features. In other words, “the RG features provided assistance to low risk players in achieving better outcomes for the same amount of money.” (Focal Research, 2007, p. 100).

Another analysis conducted by Focal Research (2007) examined the use of RG features by session for panel respondents, but by using the total number of sessions to provide a larger pool of data on which to base analyses. Although these data are arguably invalid in that a relatively higher proportion of sessions may have originated from a minority of players, the results were presented to indicate to what extent RG-activated sessions were distributed across the different PGSI risk groups. The results showed that problem gamblers activated RG features on average 3.38 times during sessions vs. 3.16 for moderate risk gamblers, 1.73 for low risk and 2.44 for no-risk gamblers. Problem gamblers in particular were the highest users of Live Action (47 per cent of their sessions), but one of the lower users of My Account (play information statement over a longer period).

Summary of Focal Research report

In conclusion, the Focal Research (2007) study confirmed many of the findings obtained in the previous two evaluation reports. People have few difficulties in using the RG features and many will use these features over an extended period once they have tried them for the first time. People appear to prefer the information features rather than those which limit their gambling. The results provided only limited evidence that problem gamblers or high-risk players significantly change their gambling due to the availability of these features, although there was some evidence that the features provide a useful tool for low-risk players to manage their expenditure. Many players did, increase their expenditure and the duration of sessions during the trial period, but this appears to be largely due to improvements in how many play the games. Rather than continuing to gamble when losing, players appear to be more efficient in their play when using pre-commitment: they will persist when winning and desist when losing. In this sense, the RGD appears to be a less of a harm reduction device for problem gamblers, but a player management tool to prevent low-risk players from progressing to more harmful gambling levels.

Cancellation of the Nova Scotia Pre-Commitment System

Following these earlier trials, a voluntary pre-commitment system was (now called My-Play) made available on all gaming machines in Nova Scotia in 2010 and this had then been followed by a mandatory system in 2012. The system operated until it was discontinued in September 2014. According to the Nova Scotia Provincial Lotteries and Casino Corporation (NSPLCC) this decision was made for a number of official reasons: (a) usage of the features was very low and it did not appear to have very much value or appeal to players; (b)

players did not take advantage of the feature because of concerns about violations to privacy; (c) anonymous registration meant that players were able to sign up to the system on multiple occasions and use more than one card. Some players were sharing their cards with other people; (d) the ongoing administrative cost of maintaining the system did not appear to be commensurate with the relatively small benefits to players. There were also concerns that the My-play system had led to a dramatic loss of revenue (around \$48 million between 2012 and 2014) and that there had been a decline in the number of people who were playing gaming machines.

Further consultation with the NSPLCC following this decision provided a number of additional observations concerning the system and the various factors that had potentially conspired to make it less successful. First, in terms of utilisation, it was found that very few people voluntarily signed up for the system. During this voluntary phase, only around 5 people signed up per week and this increased to around 2,400 new users per week during the mandatory phase. Analysis of these data showed that the number of sign-ups generally remained constant over time rather than tapering off as one might expect if some degree of saturation had occurred. Thus, it was suspected that the same players were signing up for additional cards rather than completely new players. When people did sign up, they typically did so anonymously and therefore they were unable to gain full access to greater information about their gambling activity. The NSPLCC supported the official view that there had been a drop in revenue, but this was not ascribed to any success associated with the operation of the features, but to the fact that a lot of people had stopped using the pre-commitment system, had stopped playing gaming machines, or switched to other activities.

On the whole, some reasonable attempts had been made to create awareness of the system and to promote its potential value to players. An extensive communication campaign was run by the NSPLCC and this involved posters, booklets and other information in venues. There were also in-venue 'ambassadors' or people placed into venues to assist with registration and how the system worked. These ambassadors offered players \$10 in vouchers to sign up for the full voluntary registration and to gain access to all the features. However, all of these efforts had not been successful for a variety of reasons. Players did not generally respond well to responsible gambling messages and did not appreciate being told how they should be told how to behave by the government. People generally had more trust in the venues than they did in the government; if the venue was not supportive of pre-commitment, then players would be similarly disinclined. In broad terms, ambassadors generally found it very difficult to encourage people to use the features because they did not appear to have a lot of "value" to customers and it was felt (based on marketing research) that at least \$25 vouchers would be needed to have any material impact on players interest in the system.

Despite all these apparent difficulties, no formal research was completed to confirm whether the cancellation of the system was justified based on empirical evidence. A 3-part research program had been implemented in 2009 and this involved baseline data-collection and then two planned follow-ups to coincide with the introduction of the voluntary system in 2010 and the mandatory system in 2012. This research failed to materialise largely because of difficulties associated with being able to match up individual level data with system data. If players were signing up anonymously and using multiple cards, it was therefore very difficult to determine whether changes in objective behaviour (as inferred from the analysis of system data) could be associated with individual gamblers. One would not know whether the system was influencing recreational gambling or problem gambling and the extent to which it was fulfilling its purpose of encouraging responsible gambling and, presumably, reducing gambling-related harm.

A.5 Playscan (Sweden)

Playscan is a software application developed by Svenska Spel in Sweden that has been available on online gambling sites for just under a decade and will soon be available on Svenska Spel's gaming machines. It uses an algorithm that tracks player behaviour to detect patterns that may be indicative of higher-risk gambling. The system is available to players on a voluntary basis. Any player who chooses to use Playscan receives periodic messages to indicate the level of risk associated with their gambling and can set various forms of limit. The messages take the form of a traffic light system. Green indicates the person's gambling is under control, yellow indicates a negative change in behaviour and red indicates the presence of a problem or that the gambling is "no longer enjoyable" (CABP, 2009, p. 59). Players who receive the red light are given information concerning help services, access to chat rooms and no longer receive promotional material (Productivity Commission, 2010). They are also asked to perform an online test (a risk assessment). The longer people persist gambling, the more information and messages they receive about their gambling.

Playscan has been subject to some evaluation work (see Griffiths, Wood, & Parke, 2008; Internet Poker Committee, 2008). In the Griffiths et al. study, 10,412 users of Svenska Spel's Internet site were sent a survey and data were collected from 2,348 valid users. The results showed that 26 per cent of people had used the Playscan features (n = 594). When asked why they had not tried the features, the results were very similar to the Australian pre-commitment trials: 75 per cent felt that they did not need it, 18 per cent were unsure of what

it did, 11 per cent said it was just for problem gamblers, and 7.5 per cent said that they could not be bothered. Overall, high frequency players were more likely to be users than low frequency players.

Fifty-two per cent of survey participants said it was useful or very useful and only 19 per cent said it was useless. When asked why they used Playscan, 47 per cent of players were curious to see what it did, 34 per cent wanted to use the money and time limits and 23 per cent wanted to play more safely. The most useful features were the: ability to set spend limits (70 per cent), view their gambling profile (49 per cent), conduct self-tests (46 per cent), self-exclude (42 per cent) and obtain support information (40 per cent). Of those players who used Playscan, 63 per cent reported that they felt more informed, 66 per cent were more confident about playing moderately, and 51 per cent felt that it helped to control their gambling behaviour.

Two further evaluations have been undertaken by the Internet Poker Committee (2008). One involved 1,000 gamblers on Svenska Spel's website and another involved 2,000 Internet poker players. Of the 2,000 poker players, 8 per cent had gambling problems and 15 per cent were considered at risk. The main findings from the survey of poker players was that those who played online poker on non-Svenska Spel sites had higher rates of at-risk and problem gambling (16 per cent and 11 per cent respectively) as compared with 9 per cent and 3 per cent for those who exclusively used the Svenska Spel products. Although this does provide some evidence that using a site with responsible gambling features may be associated with a lower prevalence of gambling problems, the CABP (2009) is quick to point out that this could also be a selection or sampling effect. Those who gambled on the Svenska Spel site were more likely to be female and older and were less likely to be regular players. These demographic characteristics alone may have explained the lower prevalence of problem and at-risk gambling in Svenska Spel gamblers. Most people set sensible limits. Forty-two per cent, set limits that were similar to what people intended to spend, but 25 per cent set limits higher than they intended and 33 per cent set limits so high that they effectively bypassed the limit features (Internet Poker Committee, 2008). These tendencies were even more strongly observed for time-limit setting: 31 per cent set limits close to what they intended to spend, 28 per cent set limits somewhat higher than intended time and 41 per cent bypassed the features by setting very high limits (e.g. 24 hours in a day).

In line with almost all the other studies, the results showed that people were much more willing to set monetary limits than time limits. The study recorded 118,000 limits set on monetary expenditure, but only 39,000 for time-limits. Seventy-nine per cent indicated that the money limit feature was 'good' or 'very good' as compared with 63 per cent for the time-limit feature. The survey showed that 45 per cent of players had been stopped from hitting a limit by using the Playscan system and 63 per cent of these people reported not going to another provider to continue to gamble and 68 per cent did not alter their limits (CABP, 2009; Internet Poker Committee, 2008).

Further data collected in this study enabled the researchers to examine people's use of other features. For example, people can use a 'navigator' feature to view their time and money limit. Fifty-seven per cent of the sample used this feature and 40 per cent had it on at all times. The time-out feature allows players to exclude themselves from playing for a specified period of time and 5 per cent of Internet players with Svenska Spel used this feature. Most (75 per cent) did not move to other sites to gamble when this exclusion was enforced and 59 per cent chose to exclude for one week rather than selecting the longer or shorter options. The evaluation found that people with gambling problems were more likely to use the exclusion option (11 per cent) than other gamblers without problems (3 per cent). Another feature is the availability of the light warning and a short self-test. The evaluation found that 16 per cent of players had taken this test. Of those who had a yellow light (16 per cent of test-takers) or a red light (6 per cent of test-takers), 44 per cent indicated that they had reduced their gambling as a result of taking the test.

In conclusion, the results of these evaluations show that pre-commitment tends to operate in a very similar way in both online and land-based environments. Many players gained some benefit from the system or saw it as useful, but only 26 per cent of players activated the system. Of these, only 42 per cent set monetary limits close to what they intended to gamble, which means that only around 12 per cent of players on Svenska Spel's site (.26 x .42) managed their spending as would be intended by the implementation of the features. Despite this, there was some evidence that the ability to monitor one's limits and self-exclude were features that may be useful for many players and potentially most beneficial for problem gamblers. It is not, however, clear whether problem gamblers were more or less likely to adopt Playscan and benefit from its features over a longer period.

A.6 Norsk Tipping (Norway)

Norway is often cited as a useful reference point for pre-commitment research because it is the only country in the world with a mandatory pre-commitment system in place for gaming machines (or VLTs). VLTs are available via a state-controlled monopoly, Norsk Tipping. People wishing to gamble on VLTs in Norway have

to obtain a gambling card and charge it with credit. Mandated limits are set for each week and month, so that players with a given ID card will not be able to gamble if those amounts are reached, but players can also set their own voluntary limits. Two classes of machine are offered: Multix and Belago. Multix machines are low-risk machines that are typically located in convenience stores with a basic maximum prize of around \$AUS300, whereas 'higher-risk' Belago machines are located in bingo halls/mini-casinos with a maximum prize of \$AUS500. Larger jackpots are available on both. Both types of machine allow up to 20 spins per minute and have maximum bet sizes of up to 50NOK (just under \$AUS10). On Multix machines, people are restricted to expenditure limits of around \$80 per day and just over \$AUS400 per month, whereas Belago machines have limits of around \$AUS150 and \$AUS800. On Multix machines, there is a mandatory 10 minute break at the end of an hour of play and 30 seconds on Belago machines.

A recent summary of the operation of this system (Engebo, 2012) showed that 24 per cent of Multix and 12 per cent of Belago players reached their monthly loss limit at least once. Analysis of total session activity showed that 1.4 per cent of Multix sessions and 2.9 per cent of Belago sessions ended due to reaching a limit. Around 20 per cent of total players experienced the mandatory time-outs.

Analysis of voluntary limit setting has also been undertaken. As reported by the CABP (2009), a brief pilot evaluation was conducted between August and November 2008 and this involved 16 VLTs located in 8 locations in 4 Norwegian towns (Sjolstad, cited by the CABP, 2009). The results showed that very few took advantage of the pre-commitment features: 1.3 per cent used the voluntary money limits, 2 per cent used time-outs, 2 per cent used the self-test and 2.3 per cent reached the mandatory monthly expenditure limit imposed by legislation. Similar, but larger scale analyses were undertaken by Engebo (2012) with access to Norsk Tipping data. These results showed that 3 per cent of gamblers on either Belago or Multix machines set a voluntary limit (i.e. something other or lower than the mandatory settings). Engebo's analysis showed that revenue typically went down in the fourth week of every month which was consistent with the fact that people tended to decrease their expenditure when the mandatory limit was being reached.

A.7 Implications for YourPlay

The general conclusion to be drawn from these trials is that voluntary pre-commitment schemes generally do not work well unless they are carefully designed. Uptake rates are generally very low and players generally do not consider the features to have any value to them. Given these circumstances, it is important to consider what can be learnt from previous trials in designing and promoting the Victorian scheme.

The first important issue is that the cancellation of the My Play system in Nova Scotia needs to be acknowledged and attempts need to be made to avoid some of the difficulties that beset the promotion and implementation of that system.

It will be important to highlight a number of important differences between the Victorian and Nova Scotia system. The first is that the Victorian scheme (by being voluntary) will not be forced upon players in the same way as in the mandatory phase in pre-commitment. This may make involvement in the system appear more of a personal choice (although similar issues will apply to encouraging voluntary involvement). Players in Victoria will also have the ability to continue gambling beyond their limits so that the feature will not appear to be so restrictive on their play and potentially be seen as a helpful reminder rather than a constraint on behaviour. Another important element of the Victorian system is that it will take a more dynamic approach to information on screens. Rather than having players press screens to obtain information, the Victorian system will provide pop up reminders and information at periodic intervals. The Victorian system also uses anonymous sign-ups which creates a potential challenges for linking individual behaviour with objective data, but this is recognised in advance.

Other compensatory evaluation strategies will be put in place to obtain insights into changes in behaviour over time when the voluntary system is made available.

The Victorian system implementation will also attempt to avoid some of the problems that affected the Nova Scotia system, e.g. the value to players will need to be emphasised; responsible gambling messages will be used with caution; and, the discretionary nature of the feature will be promoted as an advantage and benefit to players.

A.8 Removal of ATMs from Victorian gaming venues: Insights into potential behavioural responses

Following an amendment to *Victorian Gambling Regulation Act 2003* (the Act) as of July 1, 2012 'venues cannot provide, or allow another person to provide, access to ATMs within approved gaming venues'. Under section 3.5.33C of the Act, ATMs are not permitted within the premises of approved gaming venues, to be

located on exterior walls of gaming venues or any land or car park owned or leased by the gaming venue operator. The rules for casinos and gaming facilities located on racecourses are different, such that ATMs are not permitted within the specific gaming area or 50 metres walking distance of the entrance to a gaming machine area or casino. A venue operator can apply for an exemption, subject to certain conditions, but if an exemption is granted restrictions would apply to withdrawal limits, cash advances and the location of the ATM (i.e. still not to be located within a gaming area).

Following changes that came into effect from July 1 2012, venues responded by extending access to traditional EFTPOS facilities and introduced cash access devices effectively to replace ATMs. The Victorian Government subsequently announced its intention to extend the ATM ban to apply to ‘any cash access device that does not require the customer to interact with venue staff’, which is consistent with the original intention to remove ATMs from gaming venues and consistent with the findings of the Productivity Commission report (2010) that strongly supported face-to-face interaction when making money withdrawals as a potential measure to assist problem gamblers.

The Victorian Office of Liquor, Gaming and Racing commissioned research to assess the effectiveness of the ban on ATMs as a harm minimisation and consumer protection measure.²⁸

The removal of ATMs from venues with electronic gaming machines was primarily designed to assist problem gamblers and those at risk of becoming problem gamblers.²⁹ According to the report the two groups represented 0.5 – 1 per cent of the Victorian adult population (i.e. problem gamblers) and 1.4 – 2.1 per cent of the adult population (i.e. at risk of becoming problem gamblers).

Two key findings were:

- a) The report found that higher risk gamblers spent less time and money on gaming machines post removal of ATMs, and that gamblers in general had more control over their spending. However, some problem gamblers were able to circumvent the restrictions by accessing money from external sources or EFTPOS facilities.
- b) Gaming machine revenue declined by 7 per cent following the removal of ATMs.

The results and reactions to the restrictions are summarised for three separate stakeholder groups: venues, patrons and staff.

Venues

- There was a significant increase in the availability of EFTPOS facilities in all venues. Prior to legislative changes 40.4 per cent of venues did not have EFTPOS facilities and post-legislation only 3.4 per cent did not have these facilities.
- New EFTPOS facilities often were placed where ATMs used to be.
- A number of venues introduced cash access machines that involve a two-step process of a staff member processing a withdrawal request and providing the patron with ‘an amount slip’ with the patron then accessing the amount using the slip at the cash access machine.³⁰
- Forty-five venues involved in the study made physical modifications to their venues, (e.g. changes to the bar area, 21 of these were related to new EFTPOS facilities).
- Venues reportedly observed a drop in patronage related to gaming machine gambling in clubs and hotels but equally reported noticing little impact on regular gamblers.
- It was reported that spending by other types of patrons (e.g. dining) did not change significantly nor did spending on other types of gambling.

Patrons

- Some patrons reported pre-planning their spending, bringing money with them prior to visiting the venue, some claiming to bring more than they would have had previously.
- A number of patrons found the new EFTPOS facilities inconvenient due to queuing, the failure to provide account balances and multiple actions to access money. However, this provided time for patrons to reconsider their spending.
- Patrons do not like the idea that when using EFTPOS facilities both venue staff and other patrons can observe their withdrawals.

²⁸ Thomas, A., Pfeifer, J., Moore, S., Meyer, D., Yap, L. and Armstrong, A. (2013), ‘Evaluation of the Removal of ATMs from Gaming Venues in Victoria’, Australia.

²⁹ Pre-commitment has a much broader scope; to assist all players manage time and money spent on EGMs.

³⁰ As reported on *InDaily* (14 February 2014), these machines are in operation in South Australia as a way of circumventing recent Federal Government legislation placing a daily limit of \$250 on ATM withdrawals in EGM venues.

- 31 per cent of problem gamblers and 11 per cent of moderate risk gamblers reported frequently using EFTPOS inside gaming venues following the removal of ATMs.
- All problem gamblers reported accessing ATMs at venues before the removal of ATMs. After the removal of ATMs, only 67 per cent reported accessing EFTPOS facilities. Problem gamblers and moderate risk gamblers reported spending less on gaming machines following the removal of ATMs. A reduction in spending, particularly for problem gamblers, was attributed to a reluctance to use EFTPOS.
- For high-risk patrons there was a strong deterrent in having to involve a staff member in their withdrawals, i.e. they were concerned that if they conducted too many withdrawals a staff member would intervene.
- Three-quarters of low risk gamblers reported no change in their spending, however, the removal of ATMs had moderated spending.
- Most patrons did not report finding the removal of ATMs inconvenient and the patrons who were more likely to respond that the removal was inconvenient were from higher risk groups. Problem gamblers did report that the removal was beneficial.
- The vast majority of patrons responded that the removal of ATMs had not changed the venues they visited or what they gambled on. Some problem gamblers reported they changed to venues that had external ATMs nearby (e.g. venues in a shopping centre).
- Older patrons had more difficulty (compared to younger ones) adapting to the change due to the technology involved; older patrons reported carrying larger amounts of money with them in venues and if this was actually the case, then safety and security for patrons in handling money may have been the opposite of that reported for staff (i.e. see the discussion below on enhanced safety and security around money handling).

Staff

- Gaming managers and staff reported witnessing multiple EFTPOS withdrawals and patrons timing EFTPOS withdrawals to avoid interacting with the same staff member, e.g. by accessing EFTPOS after staff had changed over. Staff generally did not increase the numbers of interventions they had with patrons.
- The report found that the attitude of staff was important in influencing the attitudes of patrons, i.e. patrons were much more likely to be accepting of the changes if staff explained the reasons behind the changes.
- Increased workload for staff related to new EFTPOS facilities.
- Interactions with staff and patrons (in order for patrons to access money) apparently enabled venues to recognise excluded patrons.
- Venues reportedly hired more staff to cope with increased EFTPOS withdrawals and reported enhanced safety and security around money handling.

Appendix B

The Harms from Gaming Machine Gambling

One of the two objectives of the Victorian pre-commitment scheme is to reduce the harms that arise from gambling. Most individuals participating in gaming machine gambling do not experience any harms; however, for a minority of gamblers the harms to themselves, their families and the wider community, can be significant.

In order to evaluate the extent to which the pre-commitment scheme has delivered on this objective it is first necessary to understand the ways in which gaming machine gambling can lead to harm, both to the gamblers themselves, to others in their household, and to their workplaces and communities. The current understandings of the ways in which these harms can occur, and the forms in which these harms can take, are set out in Table 3.1.

These harms have been grouped under their three broad causes:

- excess expenditure;
- excess time spent gambling; and
- excess mental focus on gambling.

Such a typology is, however, an over- simplification as illustrated by the following example. Excessive pre-occupation with gambling (and its associated consequences on interpersonal relationships) is one of the sources of suicidal ideation amongst problem gamblers, but it would also be true that the financial stresses caused by excess expenditure can also be a factor in suicidal ideation for some problem gamblers.

It is also important to keep in mind that pre-commitment can ***only reduce the harms caused by an individual's gambling in so far as it results in changes to individual's time and expenditure patterns (or if it prevents their future gambling behaviours taking a more harmful form)***. In the context of the Victorian pre-commitment scheme this could occur from:

- gamblers with impaired control setting limits to expenditure or time that are lower than their current (potentially harmful) levels, and then choosing not to override these limits, or
- through gamblers using the expenditure tracking feature to become more aware of how their actual gambling behaviours differ from their planned levels of expenditure or time and then modifying these behaviours (or seeking help to do so); or
- gamblers using the expenditure tracking feature to become more aware of how their gambling behaviours are changing over time, and taking steps to prevent (or ameliorate) harm from occurring.

In other words, it is important to assess whether attitudinal and cognitive changes are borne out in actual changes to behaviour.

Table B.1 Forms of harm from gambling

Primary impacts	Secondary impacts on gambler	Secondary impacts on others
Excess spending	<ul style="list-style-type: none"> Reduced savings/assets Reduced spending on other goods and services Increased debt Bankruptcy Financial crime Imprisonment 	<ul style="list-style-type: none"> Reduced household savings/assets Reduced household spending on other goods and services Increased household debt Bankruptcy of family members; potential implications for joint assets Impact on workplace of embezzlement by a colleague Lost access to significant other/family member/friend due to incarceration
Excess time spent gambling	<ul style="list-style-type: none"> Lost time spent at work Lost productivity at work Lost employment Financial impacts of unemployment Impacts of unemployment on mental and physical wellbeing Lost time to spend with significant other/family members/friends/community Divorce (financial cost) Divorce (emotional cost) 	<ul style="list-style-type: none"> Extra work to cover absences by work colleagues Reduced productivity of work colleagues Transaction costs of dismissal and finding new employee Financial impacts of unemployment on household Increased social security costs Impacts of family member's unemployment on mental and physical wellbeing Increased healthcare costs due to reduction in wellbeing caused by unemployment Lost time to spend with significant other/family member/friends/community Divorce (financial cost) Divorce (emotional cost)
Excessive mental focus on gambling	<ul style="list-style-type: none"> Obsessive thoughts/feelings Lack of engagement with others Suicidal ideation Suicide/self-harm 	<ul style="list-style-type: none"> Lack of engagement from significant other/parent/child Impacts of suicidal ideation on family and friends Emotional impacts of suicide/self-harm on family and friends Financial impacts of suicide self-harm on household Financial impacts of suicide/self-harm on community