Evaluation of Your

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

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 matib0 Ged (or at best be n as something no relevance to most gamblers) and thib0 G could have a significant negative impact on take.

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 staffôs 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

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.

Recomm

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

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	2,722

Review of training for gaming workers

Online training is made available to provide venue workers with details of how YourPlay operates, and this

One quarter of

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 ôbetter information on the time and money they spend gamblingô, see Figure E.4. The next most common benefits were helping individuals ôstick to the amount of money they want to spendô(21 per cent); ôexperiencing less stress around gamblingô(14 per cent); and ôgetting a better understanding of their gambling by looking at their gambling historyô(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 ôgambled only rarely or infrequentlyô, 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 ônot interested in the card or just want to gambleô(13 per cent), ôdid not find the card usefulô(12 per cent), and ôno lo o

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

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 ña great dealò or ñquite a lotò better informed about their gaming machine spending, and 29 per cent reported that using YourPlay meant that it was ña great dealò or ñquite a lotò 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.

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, gamblers' behaviours during the session change.

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 ñbetter informed decisionsò (e.g. consumer protection) and 1/7th to outcomes around reduced harms to self and others reflecting the schemeôs 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 telenETQqvambler made use of

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.

Part A Background and Baseline

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2. Objectives and Intervention Logic Underpinning YourPlay

2.2 How does YourPlay operate?

The core of gamblersô 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 ócasual userôYourPlay 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 causal 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

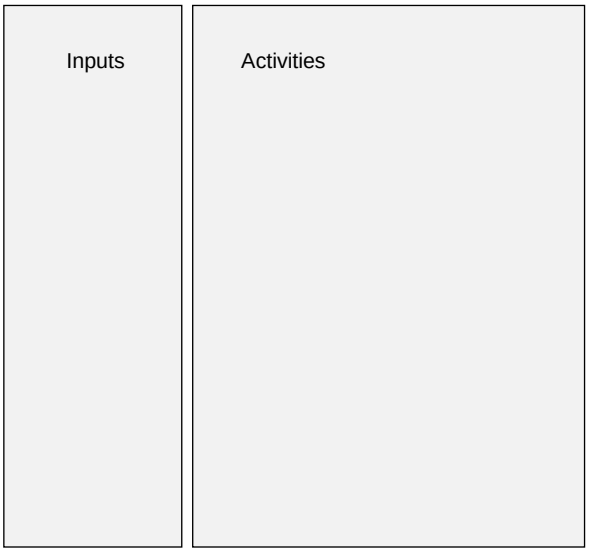
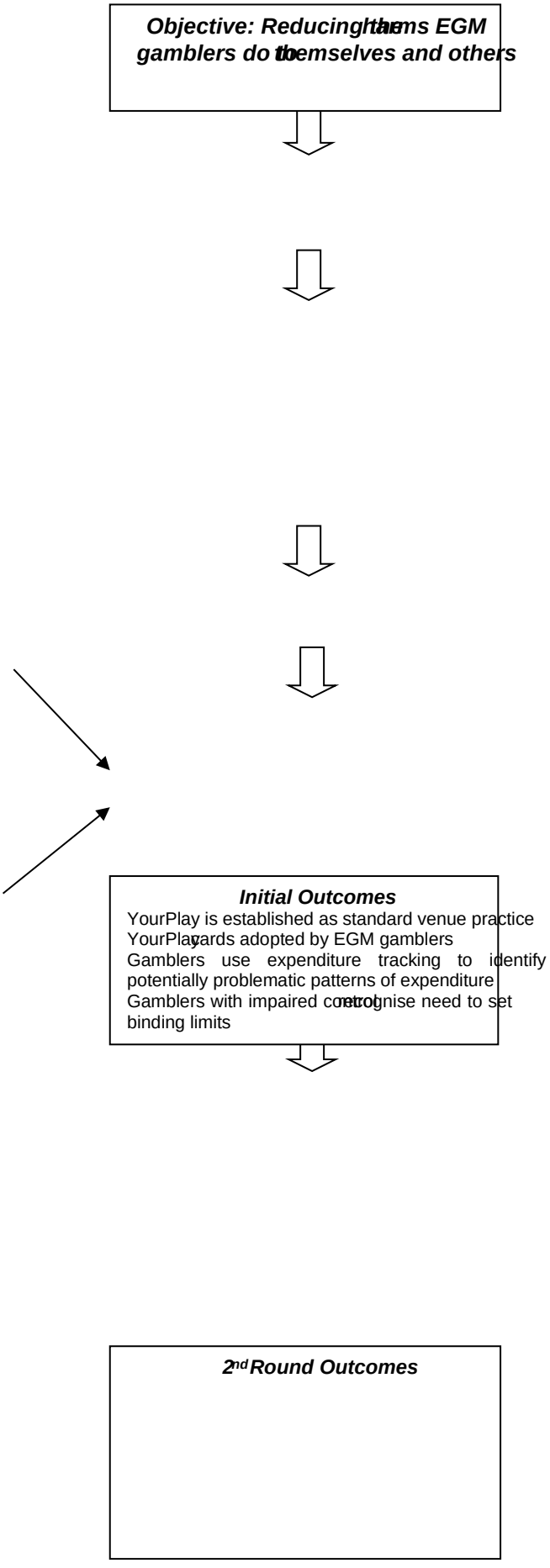

Inputs
Activities

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



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. HoweverFo21(f)venta

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.

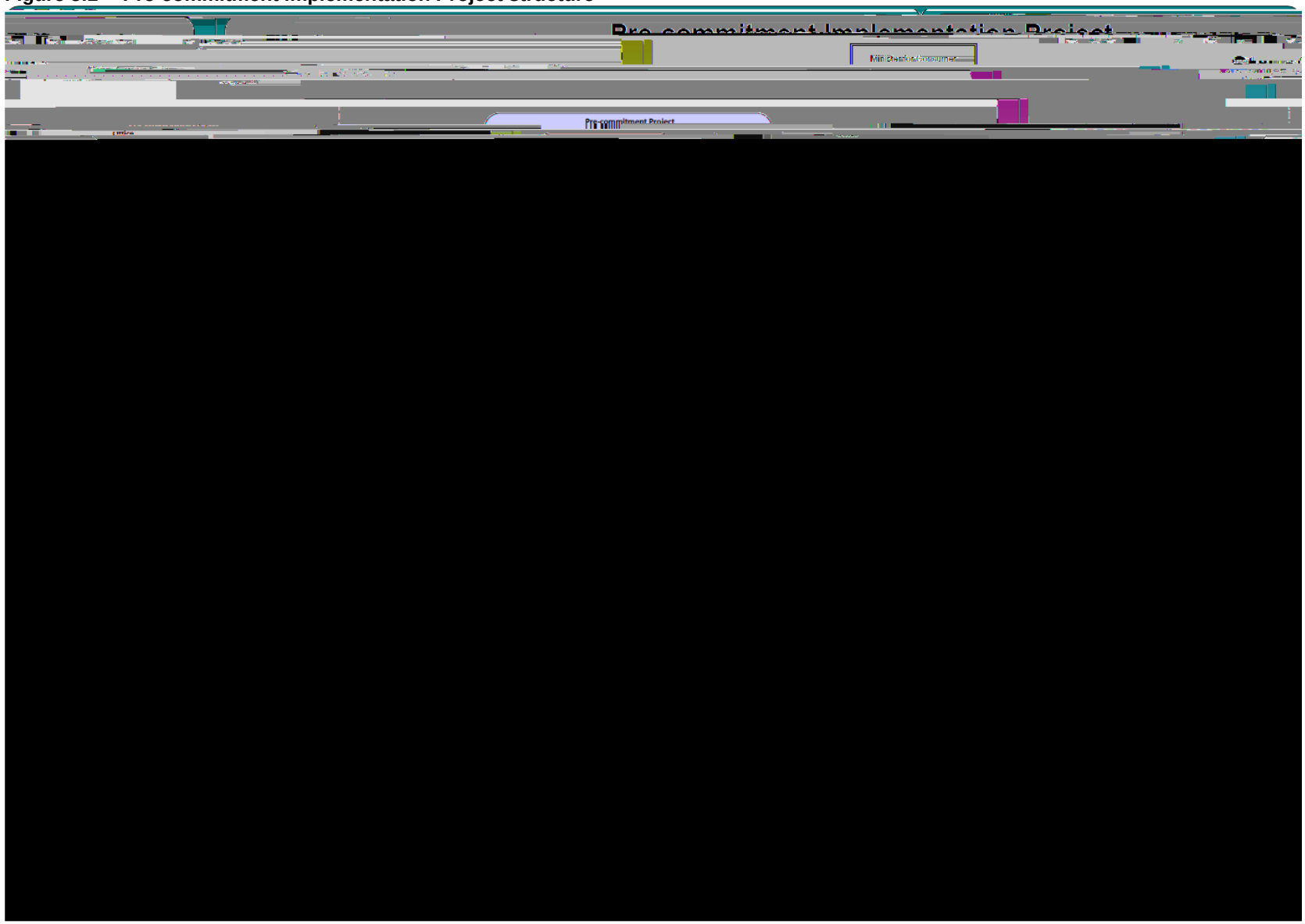
This leaves the introduction of some form of control measure to reduce ñaccessò to gambling (with the most extreme version of such measures being outright prohibition) as the approach most likely to address the market failures in gambling.

Of course harm minimisation measures themselves impose costs on all those gambling on EGMs[9], 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 6 TfgblreEf easures Eamid Ea ncleds ng suaxts ivanl-4( )-434litierc Ef the ommindti Co snpretion s-3(e)-34(Ef)-8( )-24(E

tuet likit

Figure 5.1 Pre-commitment Implementation Project structure



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

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.

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 pa/cular .

If gamblers are not aware of YourPlay then they cannot use it, regadless of what at/tudes they hold regading pre-commitment and expend/ture tracking.

Similarly if gamblers do not believe that pre-commitment or expend/ture 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 a/med only at those with gambling problems then take up is likely to be very limited (even amongst those with impaired control whilst gambling).

Th/s 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

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 ónever ôlost track of their money. A further 19 per cent felt that they órarely ôdid, 3 per cent said ósometimesô, and 7 per cent said that they óften or always ôdid.

Nearly two thirds (64 per cent) of respondent believed that they ónever ôlost track of *time* when playing pokies. A further 19 per cent mentioned órarely ô, followed by 10 per cent who said ósometimesô, and 7 per cent who said óften or always ô

Figure 7.2 EGM gamblers' management of time and expenditure

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

Respondents were then asked how often they went over their time limit, one third (33 per cent) of respondents felt that they ónever ôdid, this was followed by 18 per cent

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 tota8 0.412 Tm0 g0 G[ ]0E					

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

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 φplayersôfor 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

9. Review of Gaming Worker Training

9.1

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-

Figure 9.3

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., ó have been thinking about using this, but I am not sure. What can you tell me about it?ò

The training (if this is the only material provided)

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.

> ³,W KDV EHHQ LPSOHPHQWHG VXFFHVVIXO*Venue manager, higher use* EXW KLJKHU XVH Q¶W EHHQ club

> ³,W¶V D JUHDW WRRO WR KDYH RQ LWV RZQ EXW XQIRUWXQDWHO\ LW¶V UHDOO\ *it. ´Venue manager, higher use* club

> ³,W¶V D JRRG LGHD EXW LQ*Staff member, low use club* RXU H[SHULHQFH LW¶V QRW

> ³, FDQ VRUW RI VHH WKH SRLQW EHK*Such a big problem in society* EXW DOVR JDPEO

> *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.

> ³,W¶V D ZDVWH RI WLPH DV , MXVW GRQ¶W. *Staff member, higher* use club

> *(On their overall view of Yo* XU3OD\ ³:DVWH RI*Staff member, low use hotel*

> ³7KH JRYHUQPHQW VKRXOG V\U WœÁ€"@ X V0 22iio43>-45<0046>-0>51>-9<00B6>290-7<

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

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.

> 3 S H R S O H N Q R Z Z K D W Staff member, low use venue W Q R Z ´

Managers and staff felt that regular patrons who are unaware of YourPlay, are unaware because "they don't want to know about it.ò

> 3 : K H Q \ R X W U \ W R H [S O D L Q Staff member, low use venue G R I I ´

There were very mixed experiences reported about using other forms of in-venue advertising such as announcements over the PA system, pre-recorded ôradioô 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 ômore intrusiveô 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*

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

11. Impact of YourPlay Days

In October 2016 the Department trialled a new, venue focussed, approach to promoting YourPlay, called YourPlay Day

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

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 clubs[12]

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 s(f)-1.322 841.92 reW* nBT/Fuap(l)5pens22 87-10(o)-o22 82sme22 82sf o

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
Metro & Club	60		

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 ótypicalô 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	

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

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 a

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.

13.4 Use of YourPlay

When respondents were asked about how often they used their YourPlay card when gambling

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 ôeasy to pick up a cardô(75 per cent). There were also

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 theÔ ɔ ɐ ě k moᵐ þ k tľ þ k

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 ógambled only rarely or infrequentlyô, 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

Relevant regulations

Researchers used a checklist to mark off what extent each venue had met each criteria.

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,

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.

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 researchersô overall observations, it was common for one staff member to begin explaining YourPlay

Venues located in inner metro areas were less likely to mention ôYou will receive annual activity statements letting you know how much time and money you have spentô(21% compared with 38% overall).

Regional venues (61 per cent) were more likely than venues located in i 595.o7.02 Tm0 g0 GÞ(an0.000008871 i)5(5

A minority of interactions involved the staff (6 per cent) mentioning that ñit is only for those who have a gambling problemò. 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 ñonly for those who have a gambling problemò (13 per cent, compared with 6 per cent overall).

Six per cent of staff members mentioned that YourPlay ówas not a useful scheme to useô and that a loyalty

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 sta

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 driversô 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 ñitôs for anyone so that they know how long theyôre in here for because itôs easy to forget.ò 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 explan

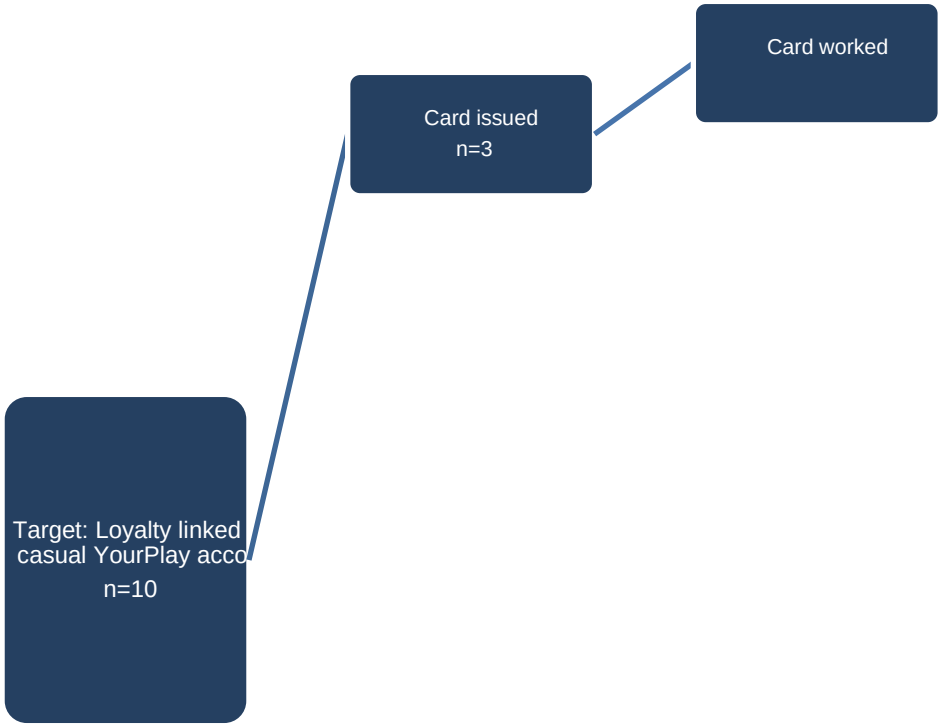
The three shopping visits where contact was not able to be made with venue staff, and the one visit where the researcher could not gain access to the gaming room are included in the analysis of outcomes as they represent visits in which it was not possible to obtain a YourPlay card.

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 ôlower useô and 4 per cent of ôhigher useô 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		

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

Blue

Figure 14.10 Attempted sign up to loyalty linked

Figure 14.11

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 õa few bad applesò 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 hoursô 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.

Part D Impact and Cost Effectiveness

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

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 46he

Figure 15.3 Whether YourPlay has made it easier to stick to the limits respondents have set for themselves

n = 85 respondents

YourPlay messages

Figure 15.5 Impact of pop-up messages on gambling session

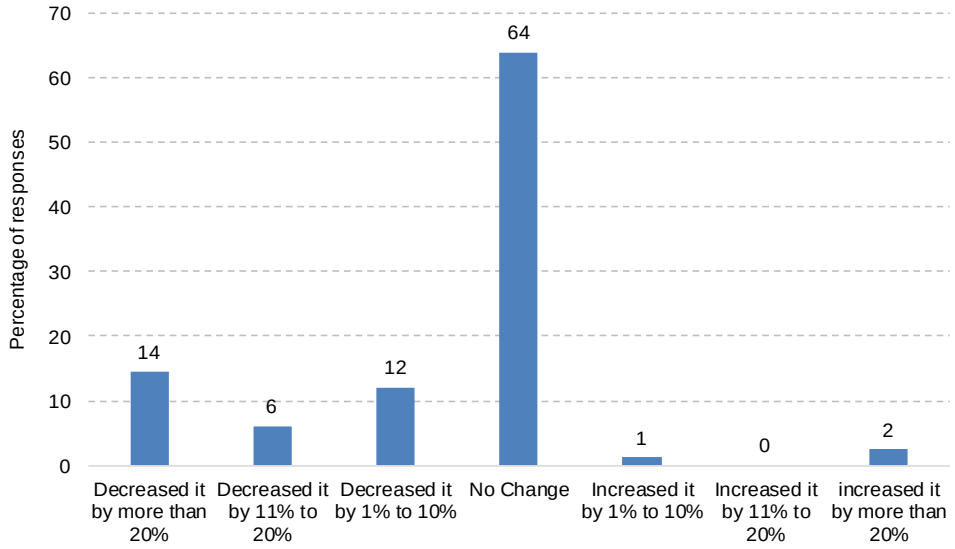
n = 74 respondents

Impact on spending and time played

Almost two

Analysis based on risk profile shows that 68 per cent of high-risk gamblers reported ómo changeôto the time spent playing pokies.

Figure 15.7 Impact of using YourPlay on how much time respondent spent playing gaming machines

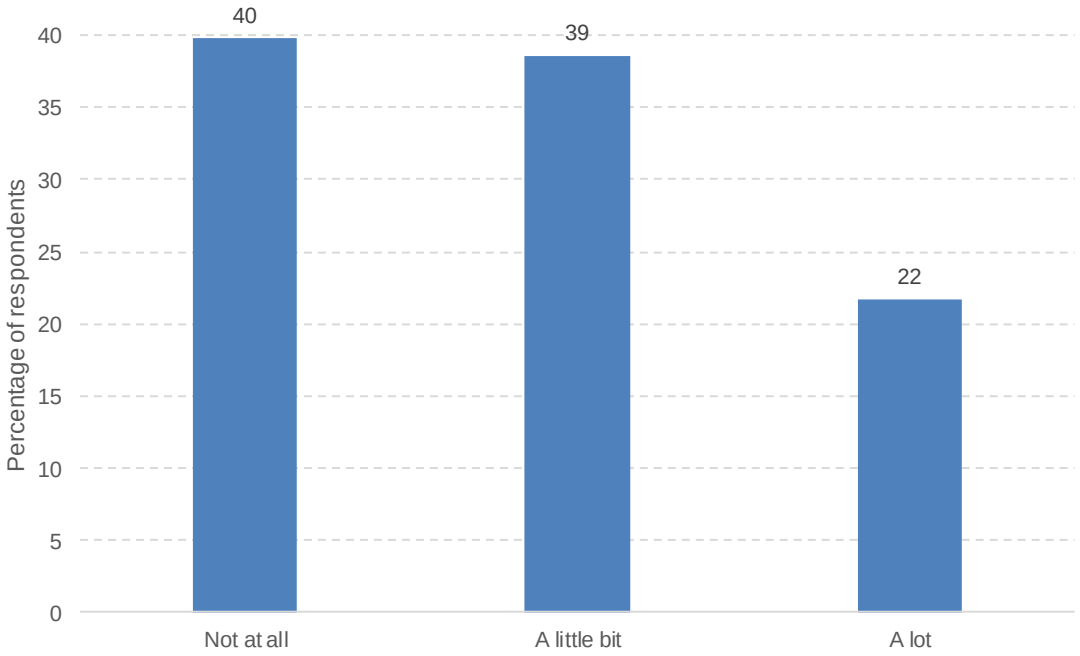


n = 83 respondents

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 ónot at allô, 39 per cent said éa little bitôand 22 per cent said that YourPlay has óhelped them a lotôto 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.

16.

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 ñbetter informed decisionsò (e.g. consumer protection) and 1/7th to outcomes around reduced harms to self and others reflecting the schemeôs primary focus on consumer protection.

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

1

It is also likely to be the case that ómystery shoppingô 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 fetpW.984 7lo s

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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. n Phase 3, a random selection of J-

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

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

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

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 ôhigher-riskô 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

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:

Table B.1 Forms of harm from gambling

Primary impacts	Secondary impacts on gambler