“Responsible Gambling” Policies and Promotional Work: Retrospective and Outlook

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Abstract: The development of policies and promotion of “Responsible Gambling” relies on the participation of various interested parties, including the government, gamblers and their families, gaming operators, gambling disorder prevention and treatment organizations, education and community organizations to play the appropriate roles and take the corresponding responsibilities. With the roles and functions of these parties in “Responsible Gambling” as the starting point, this paper reviews the work carried out by each of the parties over the past ten years, summarise the relevant experiences and provide recommendations for the development of innovative policies and promotional work for the “Responsible Gambling” in the future.
1. INTRODUCTION TO THE “RESPONSIBLE GAMBLING” POLICY

To ensure the continued healthy development of the Macao gaming industry as well as prevent the formation of gambling disorders, the Office of the Secretary for Economy and Finance commissioned the Institute for the Study of Commercial Gaming of the University of Macau to conduct research work in this field. The report referenced the vast experience regarding the work done in the field of gambling disorder prevention in countries such as Canada, Australia and the United States, as well as the gambling culture and social characteristics of the Chinese people, and was submitted in 2008, recommending that the MSAR Government adopt a “Responsible Gambling” policy philosophy. These recommendations were subsequently adopted and the corresponding policies and measures were created.

“Responsible Gambling” signifies an adequately regulated environment wherein gamblers will not pose any threat to their own well-being, or that of their family members, relatives, other gamblers and casino staff when participating in gambling activities, or cause any negative impacts to the surrounding environment and place of origin of the gamblers. In other words, “responsible gambling” is reducing the extent of harm caused by gambling behaviour to a socially acceptable level. To achieve this goal, the Institute recommended involving the government, gamblers, their relatives and friends, gaming operators, problem gambling (gambling disorders) prevention and treatment organizations, educational and other community organizations to share the responsibility collectively in order to ensure that gamblers are well informed while making gambling decisions and that their gambling behaviours are exacted responsibly in relation to themselves, their relatives, their friends and society.

“Responsible Gambling” suggests five principles to which all interested parties should abide. The first of these is the principle of “shared responsibility.” All parties shall assume their respective responsibilities to adopt, promote and implement the “Responsible Gambling” policy. The second is the principle of “balanced development.” All parties should work together to achieve a balanced model based on sustainable development. The simplest point of equilibrium is achieved when all parties minimise the potential hazards of gambling while still benefiting from all the social and economic advantages that gambling activities bring to the table. Next comes the principle of “informed decision”. Each gambler should be provided with the knowledge that he or she deserves in order to make the most appropriate gambling decisions. For example, gamblers should be made aware of the house advantage for each casino game, as well as the potential risks of gambling. Although each gambler should ultimately be responsible for their gambling behaviours, other parties should also provide timely and appropriate information to assist gamblers in making responsible decisions. The fourth
principle is “harm minimization.” Although “Responsible Gambling” can effectively prevent some of the social harm caused by gambling, this does not mean the harm can be fully eliminated. Even if the gambling is completely prohibited, the social problems caused by illegal gambling still exist. Therefore, the respective damages can only be reduced to a level deemed acceptable by society. The final principle is known as “best practice.” All policies and related practical plans should only be proposed with the support of empirical evidence and conceived based on reliable scientific research and findings. However, in the absence of empirical evidence or scientific research and findings, “Responsible Gaming” policies should be based on what is known as “best practices”, meaning that during the implementation of the policies, there should be sufficient evidence that demonstrates that the best outcome has been achieved, or that the definitions and requirements of “Responsible Gambling” have all been met.  

The “Responsible Gambling” proposal also has three main objectives: first, preventing and reducing the relative hidden risks associated with gambling; second, reducing the occurrence and impact of gambling disorders; third, helping gamblers limit their gambling expenses to an affordable level. Reviewing the work related to “Responsible Gambling” requires evaluating the completion of the abovementioned three objectives.

The MSAR Government has actively been promoting work related to “Responsible Gambling” and formulating laws and guidelines to incentivise all of the parties involved to perform their respective duties, all with the aim of jointly preventing and minimising the potential risks associated with gambling. As such, the first goal has essentially been achieved.

The most important criterion for assessing whether or not the second objective of “reducing the occurrence and impact of gambling disorders” has been met is whether the number of people with these issues in society has decreased. The Institute for the Study of Commercial Gaming of the University of Macau conducted a survey and published the corresponding research report on the participation of gambling activities by Macao residents and the prevalence of gambling disorders as early as 2003. The Social Welfare Bureau has been commissioning similar studies on a regular basis since 2007 to provide scientific data on the work they carry out to prevent and treat gambling disorders. The report revealed that the prevalence of gambling disorders among Macao residents over the years has been declining. The prevalence of problem/pathological gambling behaviour assessed using the DSM-IV (Diagnostic and Statistical Manual of Mental Disorders, Fourth Edition) increased from 4.3% in 2003 to 6.0% in 2007, but gradually decreased from 5.6% in 2010 to 2.8% in 2013. The latest survey using the DSM-5 (Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition) evaluation showed that the prevalence rate of gambling disorders in 2016 was 2.5%.
A considerable degree of success has been achieved in regard to the first two objectives. However, the aim of “helping gamblers to limit their gambling expenses to an affordable level” has not yet been met. Therefore, this item must become a key priority and be implemented and executed as soon as possible in order to further reduce the harm caused by gambling to a socially accepted level.

2. REVIEW OF THE “RESPONSIBLE GAMBLING” POLICY AND PROMOTIONAL WORK

2.1 GOVERNMENT: DIRECT AND IMPLEMENT “RESPONSIBLE GAMBLING” POLICIES

Gaming is a special industry. In most countries and regions where gambling is legalised, which institutions can operate gambling activities, which games are offered, who can enter gaming areas and establishments and who can participate in gambling-related activities are determined by the government, which formulates the relevant policies and regulates the gambling activities through special laws. As the gambling policy maker and guardian of the public interest, the government should play a major role in orienting and popularising policies for promotion of “Responsible Gambling.” Over the years, the government has used measures such as legislation, publicity and education to promote “Responsible Gambling” and reduce the negative impact caused by excessive gambling.

i. Formulating New Laws

To protect young people from being adversely affected by an early exposure to gambling activities and safeguard the interests of the community, the government introduced a bill in 2011 which came into effect in 2012. The new regulations increase the minimum gambling age from 18 to 21 years and also prohibit people under 21 years of age from engaging in professional activities within casinos. In addition, to avoid excess gambling by people who have difficulty in controlling their gambling behaviour, the same law also specifies that the gambler himself or herself (self-exclusion) or his or her spouse, lineal ascendants or descendants or second-degree relatives (third-party exclusion) may apply to prohibit the problem gambler from entering some or all casinos for a maximum period of two years. As of the 3rd quarter of 2018, the government has approved 1,812 “self-exclusion” applications and 214 “third-party exclusion” applications.
Research shows that the conditions of people with gambling disorders remained relatively unchanged between 2011 and 2017. Notwithstanding the unemployed, most of the help-seekers were “dealers” and “gaming employees”. To minimise the risk of workers in the gambling industry developing gambling disorders, the government proposes to amend Law no. 10/2012 to prohibit these workers from entering casinos during their non-working hours. Comparing the impacts that gambling disorders can have upon gaming employees, their families and society to the relatively inconvenience caused by preventing them from gambling in casinos, it is believed that the amendments made to Law no. 10/2012 are both significant and valuable.

ii. Promulgating the “Responsible Gambling Implementation Measures”

To cope with the new law and implement its “Responsible Gambling” policy, the government issued Instruction No. 2/2012 “Responsible Gambling Implementation Measures” for the local Games of Chance Operators, which establishes an internal code and procedural requirements for the display and promotion of “Responsible Gambling” information, the corresponding arrangements for the interiors and areas surrounding gaming venues, restrictions on gambling advertisements, “self-exclusion” and “third-party exclusion” measures, the establishment of a “Responsible Gambling Task Force,” as well as for staff training and counselling services, among other items.

iii. Establishing Inter-departmental Collaboration

In the two years following the implementation of the “Responsible Gambling” policy, the government has been carrying out cross-departmental collaboration to effectively promote the relevant work. Academic institutes and community organizations were also invited to collectively facilitate the implementation of the “Responsible Gambling” policy. The government first formed the “Responsible Gambling Work Group” in 2011 to coordinate and organise the promotion of “Responsible Gambling.” Its members include the Social Welfare Bureau, the Gaming Inspection and Coordination Bureau, the Education and Youth Affairs Bureau, the University of Macau and the Macau Polytechnic Institute. Later, starting from 2012, a set of “Problem Gambling Service Collaborative Meetings” were regularly held to review the work being carried out on the prevention and treatment of gambling disorders, as well as to collect ideas and opinions on its future development and orientation. Its members include government departments and civil organizations that provide services in the field of the
prevention and treatment of gambling disorders, as well as community educational groups.

iv. Organising Promotional Activities Related to “Responsible Gambling”

To promote “Responsible Gambling”, the Government establishes a theme each year and leads gaming operators and community organizations in collectively organising promotional activities related to “Responsible Gaming”. This initiative has allowed all those involved to pool their resources and efforts towards a unified goal, as well as created a high degree of synergy and expanded the government’s influence in the community, thereby achieving greater results. This year marks the 10th anniversary of the “Responsible Gambling Promotion” initiative. An investigation revealed that only 16.2% of Macao residents had been aware of “Responsible Gambling” before the government organised its series of related promotional activities. The proportion of residents who have been made cognizant of “Responsible Gambling” since the official launch of the promotional activities gradually increased to 63.7% in 2017.

v. Creating “Central Registry System of Individuals with Gambling Disorders”

In addition to promoting “Responsible Gambling,” the government also created the “Central Registry System of Individuals with Gambling Disorders” in 2011. The purpose of this system is to compile statistics regarding the number of people with gambling disorders who are currently seeking help in Macao, understand their gambling situation and characteristics, as well as provide data for the planning of social service resources. As of 2017, in addition to the Social Welfare Bureau, 21 community associations were participating in this system, with the total number of registered cases increasing to 1,013.

vi. Focusing on Scientific Policy-making and Scientific Governance

The Government has placed a great emphasis on scientific-policy making and scientific governance during its implementation of the “Responsible Gambling” policies. A number of local academic institutes were commissioned to conduct research on relevant issues as a means to come up with a feasible plan that corresponds with the current situation in Macao. These included the “Survey on the Participation of Gambling Activities by Macao Residents” and the “Survey on the Awareness of Responsible Gambling”.25
vii. Creating New Channels for Counselling Services

In 2014, the Government commissioned a community organisation to set up a “24-Hour Hotline and Online Gambling Counselling Services”, which aims to provide counselling services for individuals suffering from gambling disorders and their families. Between 2014 and 2017, altogether 4,674 people used the “24-hour Gambling Counselling Hotline” and 3,368 people used “Online Counselling Services.”

viii. Setting up “Responsible Gambling Kiosks/Stations”

In order to improve the promotional and educational work carried out in relation to the “Responsible Gambling” policy, as well as provide comprehensive and accurate information to residents and tourists alike, particularly gamblers or individuals planning to participate in gambling activities, the government and an academic institute have drawn on the experience of countries such as Canada, the United States and Australia and launched the “Responsible Gambling Kiosks” in 2012. Research and Development institutions have since continued to improve the content and enhance the functionality of these kiosks, with residents being able to apply for the “self-exclusion” and “problem gambling counselling for families” services since 2014, and kiosk users to use the “24-Hour gambling counselling hotline” since 2015. The installation of new passport scanners at the kiosks in 2016 allows tourists to also apply for the “self-exclusion” and “problem gambling counselling for families” services. The upgraded kiosks not only provide more comprehensive information, but also making it easier for individuals with gambling disorders to find help in a timely manner, thereby further enhancing the effectiveness of the prevention and treatment measures provided by these kiosks in gambling areas. Moreover, and in order to ensure that the kiosks located in gambling areas stand out and supply a safe and soothing place for gamblers in the midst of all the hustle and bustle of the casino, the R&D institutions launched the “Responsible Gambling Station” in 2016, which upgrades the previously more self-service oriented kiosks to an integrated multifunctional platform that combines self-service, leisure and interactive features. Meanwhile, the R&D institutions have also arranged for the stationing of “Responsible Gambling Station Ambassadors” to provide information on “Responsible Gambling” and help users operate the stations. By October 2018, there were a total of 26 kiosks and 6 stations present in local casinos, a coverage rate of 78.0% of casinos. A further 10 kiosks have been installed in local communities.
ix. **Launching the “Responsible Gambling Mobile Application” (RG APP)**

As smartphones have become an indispensable part of our daily lives, the government took some of the contents provided by the “Responsible Gaming Kiosks” and created the “Responsible Gambling Mobile Application” (RG APP) in 2014, allowing residents and tourists to obtain information on “Responsible Gambling” at any time and place. While similar to the “Responsible Gambling Kiosks,” in that the “Responsible Gambling Mobile App” provides preventative and convenient assistance to residents and tourists with gambling disorders, it can also connect directly to the “24-Hour Gambling Counselling Hotline and Online Counselling” services that allow people with gambling disorders seeking assistance to obtain the timely support and help they require.26 The mobile app has been downloaded more than 4,300 times since its launch.15

x. **Multifaceted and Diversified Education**

In order to promote “Responsible Gambling,” the government has, through various means of education, instilled within the different groups that comprise Macao’s population ideas and attitudes that correspond to their societal roles in a stratified, gradual, multifaceted and ubiquitous manner. This enables them to each shoulder their own obligations and collectively transform Macao into a responsible gambling city.27

For example, the government provides preventive education to primary and secondary school students, who are taught the proper value of money and financial management from an early age to enhance their immunity against gambling. Additionally, the government also provides preventative gambling education in order to discourage students from engaging prematurely in gambling activities. In 2016, the government completed its revision of the corresponding teaching materials for primary students, and continued its revision of the teaching materials for secondary students.28 Moreover, it also sponsored local community organisation to help them launch the “Smart Finances Promotion Plan”, which endows primary and secondary students with useful financial concepts and information. As of 2017, altogether 32 schools comprising over 8,100 students have participated in this initiative, equivalent to a school coverage rate of slightly over 40% (41.6%) and a student coverage rate of just above 10% (10.4%).8,16 In addition, the government also organises and sponsors community organizations to hold various types of promotional activities and competitions in order to enhance students’ immunity against gambling.8
Moreover, in order to ensure that students, parents, educators, schools and the community in general continuously receive consistent, systematic and complete information, the curriculum incorporates parental assignments and workshops to strengthen the education of parents as well as children. The government has also been working with professional institutions to prepare the “Parent-Child Financial Management Guide” for children and adolescents. Furthermore, the government has continuously provided relevant training for teaching staff and student counsellors.  

In order to provide the social services sector and gambling industry with a more consistent and deeper understanding of “Responsible Gambling” and on the prevention and treatment of gambling disorders, as well as effectively promote the “Responsible Gambling” policy, the government launched two certificate courses alongside two academic institutions. The first of these is the “Certificate in Macao Responsible Gambling Advisor” aimed at members of the “Responsible Gambling” Task Force and frontline management staff employed by gaming operators. The main objectives of this course are to enhance its participants’ understanding of gambling disorders and “Responsible Gambling,” develop their ability to identify individuals with gambling disorders, improve their response and handling skills, and give them the necessary skills to assist operators in implementing the work related to “Responsible Gambling.” The second course is the “Certificate Program for Macao Responsible Gambling Trainer” which is aimed at staff employed by gaming operators. Its purpose is to train instructors to enable them to convey information on “Responsible Gambling” and gambling disorders to their colleagues, thereby facilitating the implementation of “Responsible Gambling.” By 2018, altogether 334 and 50 gaming operator staff members had received certificates in “Certificate in Macao Responsible Gambling Advisor” and “Certificate Program for Macao Responsible Gambling Trainer”, respectively.

In order to enhance the professionalism of the gambling disorder services provided by social workers and counselling services, as well as develop localised and professional training in this field, the government worked with academic institutes and offered the “Professional Certificate in Gambling Counselling”. The government also provides a series of follow-up training courses for candidates who have passed the “Professional Certificate in Gambling Counselling” in order to further improve their practical skills and professional knowledge. The training includes the “Advanced Practical Course on Cognitive Behavioural Therapy (CBT)” and the “Course on the Application of Solution-focused Therapy in Gambling Counselling”. As of 2018, a total of 123 candidates received certificates in “Professional Certificate in Gambling Counselling.”
xi. **Funding Organizations to Establish Networks to Prevent Gambling Disorders in the Community**

Apart from providing a multifaceted and diversified education, the government also offers a variety of social services through the networks and diversified services made available by community organizations. In addition to assist residents to obtain a better understanding of the concept of “Responsible Gambling”, these networks also allow residents to explore a variety of interests, thus preventing them from being ensnared by gambling addiction, and achieving the objective of “Responsible Gambling” together. The government has helped fund initiatives carried out by these organizations such as the “Smart Teen Programme,” the “Smart Ambassador Programme,” and the “Rainbow Life” Gaming Employee Service Programme. Both the “Smart Teen Programme” and “Smart Ambassador Programme” aim to enhance their participants’ awareness of gambling disorders and establish a network to prevent their occurrence in these circles, thereby reinforcing their immunity to such problems. In addition, the concept of helping both yourselves and the others can be fostered through social engagement. As of 2017, a total of 3,725 youth volunteers and 306 ambassadors had joined and been trained through these initiatives. The “Rainbow Life” Gaming Employee Service Programme is targeted at employees in the gambling industry and their families, allowing them to relieve the pressures they face from their work and private life, improve themselves, enhance their personal competitive advantages, strengthen their family bonds and harmony, encourage their participation in volunteer services, as well as improve their sense of commitment towards the community and sense of belonging to Macao. As of 2017, the number of employees in the gaming industry who were registered as members stood at 14,038.  

Between 2009 and 2017, the MSAR Government spent a yearly average of ten million patacas on projects related to the promotion of “Responsible Gambling”, education on the prevention of gambling, and prevention and treatment of gambling disorder.  

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2.2 GAMBLERS: GAMBLE RESPONSIBLY

Even if each party strives to create a “Responsible Gambling” environment that provides the necessary conditions for gamblers to make informed gambling decisions, the negative impacts derived from these activities will still exist if players still gamble to excess and disregard their responsibilities. Under the guidelines provided by “Responsible Gambling”, the gambler must actively procure the relevant information before participating in any gambling activities, and fully understand the potential risks. Gamblers should only partake in gambling if they are able to make an “informed decision” and ultimately bear all responsibility associated with his or her decisions and actions.

Although there is currently a greater number of casinos than ever before, data from surveys carried out over the years reveals that the rate and proportion of local residents who participate in gambling activities in local casinos has continued to fall. The first survey carried out in 2003 showed that the participation rate and proportion of local residents who engaged in gambling activities within Macao casinos were 67.9% and 20.2%, respectively. However, more recent survey data from 2016 revealed that both had fallen to 51.5% and 10.4%, respectively.\textsuperscript{17}

Aside from the drop in the gambling participation rate shown above, the effectiveness of the promotional work carried out within the context of “Responsible Gambling” is further reflected in the decline of the frequency of participation in gambling. Data from surveys carried out over the years shows that the gambling activities that local residents engage in most are the Mark Six lottery, social gambling, and gambling in local casinos. An individual who plays the Mark Six lottery on average once or less every month is considered an occasional participant or impromptu player. The proportion of these types of players fell from 71.8% in 2007, to 62.7% in 2016. In terms of social gambling, occasional participants decreased from 69.5% to 58.6% and the proportion of occasional participants in gambling activities held in local casinos also dropped sharply from 91.3% to 62.7% during the same time-span. This shows that the promotional work carried out in relation to “Responsible Gambling” has been successful and an indisputable factor in gradually keeping local residents away from gambling.

On the other hand, the drops in the rate and frequency of local residents participating in gambling activities come hand in hand with a corresponding increase in awareness of “Responsible Gambling”. According to survey data, before the first series of “Responsible Gambling” promotional activities were launched in 2009, the proportion of local residents who are aware of “Responsible Gambling” was 16.2%. Since then, this proportion has gradually risen to 63.7% in 2017.\textsuperscript{9} Furthermore, survey
data also shows a downward trend in the prevalence of gambling disorders suffered by local residents. 17

Even so, further analysis revealed that local residents have inaccurate perceptions of concepts related to gambling and “Responsible Gambling” such as “randomness”, “independent events” and “illusion of control”, with no significant improvements over the years.Gamblers, particularly those who regularly engage in gambling activities, generally have a poor understanding of gambling knowledge.9 Therefore, there is still a long way to go before gamblers will be able to progress from simply being aware of and understanding the concept of “Responsible Gambling”, to then fully implementing it when engaging in gambling activities.

2.3 GAMING OPERATORS: OPERATE GAMING BUSINESS IN A RESPONSIBLE WAY

As gaming operators provide gambling activities for residents and tourists alike, they undoubtedly share an irrevocable responsibility to ensure that a “Responsible Gambling” environment exists within Macao. As such, they must do their utmost to adopt, promote and adhere to the policies and measures carried out to guarantee its implementation.

Since the “Responsible Gambling” policy was in effect in 2009, the operators have launched a series of “Responsible Gambling” projects and services to comply with and participate in the “Responsible Gambling” promotional campaign headed by the government. They have proactively cooperated with the government in the implementation of applicable laws and regulations such as Law no. 10/2012, which prohibits persons under the age of 21 and those who have applied for “self-exclusion” or “third-party exclusion” from entering casinos. To ensure that this legislation was properly observed, the operators conducted large-scale training exercises for its security and casino operation departments and have moreover taken the necessary proactive measures to successfully prevent many of the aforementioned individuals from entering their casinos. This not only strengthens compliance with the law, but also assists those who need to apply for exclusion from these establishments for their own benefit. 32

As regards promotional activities carried out for business purposes, the operators have strictly observed the provisions of Article 8 of Law No. 7/89/M “The General Regime of Advertising Activities”, according to which, gambling activities may not directly or indirectly be the object of promotional activities, nor shall the public be in any way be solicited to participate in these activities. All customers must be solicited through other entertainment and leisure activities. 33 Furthermore, following the instructions from the government, no gambling-related marketing or promotion is made towards individuals under the age of 21, those who have applied for “self-
exclusion” or individuals who are prohibited from entering gambling venues, and those who have not given consent to receive these types of messages.

Gaming employees are a group of people who are at a high-risk for developing gambling disorders. As early as 2006, in other words, before the implementation of “Responsible Gambling” policy, certain operators had already been providing their staff members the contact details of gambling disorder counselling organizations so that they could receive immediate assistance. Subsequently, after the corresponding instructions were given by the government, the remaining operators have added gambling disorder counselling and referral services in their companies. In 2017, a total of 41 requests through assistance hotlines were recorded, 11 counselling interviews were conducted, 4 requests were made by post or WeChat, and a total of 6 cases were successfully referred to gambling disorder prevention and treatment organizations.  

As regards the promotional work carried out in relation to “Responsible Gambling”, and in conformance with the instructions provided, the operators have set up a “Responsible Gambling Task Force” which operates 24 hours a day and provides relevant information and proper assistance to those who are in need within the casinos. In addition, the instructions also require that a variety of “Responsible Gambling” related information including promotional leaflets, application forms and advice on how to seek help be placed in the gambling venues in order to allow those who require assistance to obtain the necessary information in a timely manner. The operators not only participate in the “Responsible Gambling” promotional activities organized by the government every year, but also help sponsor activities related to this policy. They organise a variety of promotional activities aimed at their staff members, including seminars, lectures, training sessions and courses, competitions, workshops, roadshows and orientation classes. Under the guidance of the government, the operators provide “Responsible Gambling” training to each of the new staff member and further give refresher courses for members of the “Responsible Gambling” Task Force at least once a year, and for frontline gaming staff at least once every two years in order to both learn something new and consolidate what they already know. In 2017, the operators organized a total of 453, 30 and 384 training sessions for newly recruited staff, members of the “Responsible Gambling” Task Force and frontline staff members, respectively.  

Over the past years, survey data has shown that more than 90% of those interviewed had been aware of one or more of the “Responsible Gambling” initiatives carried out by the operators. Gaming employees generally paid more attention and were more aware of “Responsible Gambling” than non-gaming employees. The latest report in 2017 showed that 90.8% of gaming employees were aware of “Responsible Gambling,” significantly higher than 57.8% of non-gaming employees and in general, those who work in gaming-related activities tend to have a better knowledge of the
characteristics of casino-based gambling than those who do not. Gaming employees were also significantly more aware of the policies and regulations implemented by the MSAR Government in relation to “Responsible Gambling” than non-gaming employees. In addition, gambling disorders are more prevalent amongst gaming employees when compared to ordinary residents, which consequently implies that there is an undeniable occupational hazard in these types of professions. As such, preventing gaming employees from entering casinos during their non-working hours is an important and valuable measure to take.

In conclusion, gaming operators have fulfilled the requirements set by the “Responsible Gambling” policy as regards their staff members and customers. In the future, gaming operators must follow up on the corresponding work carried out in accordance with any newly promulgated or revised laws and regulations, as well as fully cooperate with the government in conformance with all applicable legal provisions.

2.4 GAMBLING DISORDER PREVENTION AND TREATMENT ORGANIZATIONS: PREVENT AND TREAT GAMBLING DISORDERS

Within the context of the “Responsible Gambling” policy, the Gambling Disorder Prevention and Treatment Organizations are responsible for providing professional counselling services to treat and prevent the occurrence of gambling disorders. Gambling disorder prevention and treatment organizations were established in response to local demand for these services after the liberalization of the gaming industry. In 2009, there were a total of five such organizations in Macao. By 2017, the number of gambling disorder counselling organizations had increased to eight.

To provide professional counselling services, the prevention and treatment organizations provide on-the-job training for their staff. In addition, counsellors also participate in government training courses such as the “Professional Certificate in Gambling Counselling” and the follow-up courses.

The series of “Responsible Gambling” promotional activities led by the government over the years relies on the active cooperation and participation of these prevention and treatment organizations. In response to the promotional theme set by the government every year, the prevention and treatment organizations carry out a variety of publicity and promotional activities, including urban orienteering activities, carnivals, and education-oriented promotional activities such as seminars. According to survey data, the above-mentioned activities have been effective. The awareness of residents on the issue of “Responsible Gambling” has been on the upswing since 2009.
All parties involved have long maintained close ties and cooperation. Focus groups have been organized to review the implementation of “Responsible Gambling,” retain effective and eliminate ineffective concepts and practices, and adhere to the “best practices” principle. In the latest meeting on the promotional work related to “Responsible Gambling” held in July 2018, the prevention and treatment organizations and other community organizations shared the following experiences and problems they encountered and provided suggestions for the promotion of “Responsible Gambling”:

- The number of cases concerning online gambling addiction has increased in recent years and the number of individuals who seek help via the internet now exceeds those who use hotlines for assistance. It was therefore recommended that improvements be made to the online platform in order to better disseminate the message of “Responsible Gambling.”

- Many people suffering from gambling disorders do not ask for help for several reasons, including the beliefs that they will not be able to find a job in the future. Prevention and treatment organizations should take steps to remove the stigma associated with asking for help and correct the erroneous perception related to seeking aid.

- Some young people do not bother to participate in the activities organized by community organizations. Therefore, the behavioural characteristics of young gamblers should be taken into consideration in order to more effectively promote anti-gambling measures and provide counselling.

- Since many gambling addicts are not willing to look for help, it was recommended that families be allowed to register for the “self-exclusion” measure on behalf of the affected individual.

- It was suggested that people who receive financial assistance from the government be restricted from entering casinos for gambling purposes.

- Treatment of gambling disorders needs to be improved. At present, the MSAR Government and prevention and treatment organizations use mostly cognitive therapy with no standardized criteria. According to the 5th edition of the Diagnostic and Statistical Manual of Mental Disorders published by the American Psychiatric Association in 2013, gambling disorders belong to the category of “Substance Use and Related Disorders.” Studies have confirmed that there is a link between gambling disorders and multiple comorbid psychiatric illnesses, including anxiety, suicidal ideation and alcohol dependence. If the situation of people with gambling disorder worsens, they should promptly seek medical treatment from a physician. It was recommended
that a system be created to allow the referral of patients between gambling disorder prevention and treatment organizations and government hospitals.

2.5 EDUCATIONAL INSTITUTIONS AND COMMUNITY ORGANIZATIONS: EDUCATE AND PROMOTE PROPER VALUES

The roles of educational institutions and community organizations within the context of “Responsible Gambling” are to educate the public and promote correct values, help them understand the proper value of money, provide them with a fundamental understanding of gambling, correct any erroneous ideas and help them avoid developing a gambling addiction, or at least have the right attitude when participating in gambling activities. Over the years, educational institutions and community organizations have cooperated with the government in implementing the “Responsible Gambling” policy, providing the relevant education and promotional work jointly aimed at schools, families and the community. For example, funds provided by the Social Welfare Bureau allowed the Young Men’s Christian Association (YMCA) of Macao to officially launch the “Smart Finances Promotion Plan”, through which a series of seminars have been held in schools throughout Macao since 2015 to improve the immunity of primary and secondary students against gambling.36

The community organizations also target different groups of people, including residents of different age groups (e.g., from 8 to 11 years old, 13 to 18 years old, and 50 years old or above), and residents with different roles in the community (such as students, parents, teaching staff, students and counsellors), and organize different types of activities such as seminars, training courses, hobby classes, workshops and competitions to educate them on how to avoid gambling and instead invest and manage their wealth wisely.8

3. OUTLOOK

”Balanced development” and “shared responsibility” are important principles of ”Responsible Gambling,” and two of the factors that led to the success of the implementation of the “Responsible Gambling” policy in Macao. The “original sin,” or nature of the gaming industry and the social costs derived from it cannot be ignored. Only by adhering to the principle of “balanced development” can everybody involved reduce the potential dangers arising from gambling while benefiting from the social and economic benefits it brings. The obligation to implement the “Responsible Gambling” policy does not solely fall upon gaming operators and gamblers, and must
be shared by all parties involved. As the biggest gambling policy maker and defender of
the public interest, the government must be the dominant source for the creation and
implementation of policies related to “Responsible Gambling”. Besides, it is much more
effective to have educational institutions prevent issues related to gambling through
teaching than to resolve them after they have occurred. The prevention and treatment
organizations play an essential role in providing counselling and treatment to those
who suffer from gambling disorders.

Although “Responsible Gambling” has been widely promoted in Macao, and a
considerable degree of success has already been achieved, surveys show that there is
still a lack of understanding regarding concepts such as “randomness,” “independent
events,” and “illusion of control”, with no significant improvements seen over the years.
Gamblers, especially those who frequently engage in gambling activities, generally have
a poor awareness of gambling knowledge. As data shows that there is still room for
improvement regarding the promotion of “Responsible Gambling”, it should be
strengthened based on what is already in place, and each detail of the different
measures should be optimised to ensure the healthy development of the local gaming
industry without incurring undue damages to the different communities and locations
where the gamblers reside. Therefore, this paper makes the following recommendations:

i. **Developing a Study on the Possibility of Establishing a Maximum Limit for Gambling Expenses**

In order to achieve the objective of “helping gamblers limit their gambling
expenses to an affordable level”, in short-run, we recommend conducting
promotional campaign to encourage these individuals to limit their gambling
expenses to what they can afford. Additionally, the government should also
consider the feasibility of introducing regulations in Macao to limit gambling
expenses, and carry out policy research to this effect, using analogous measures
that have been adopted in other countries as a reference. For example, the State
of Missouri in the United States sets a maximum limit for the amount of money
that can be lost per trip. Gambling behavioural research found that asking players
to set a cash limit is particularly effective on getting frequent gamblers to reduce
their gambling expenses.

In Macao, this issue can be tackled from the perspective of junkets. One of
the reasons for the rapid development of the local gaming industry are the junket
promoters that provide services such as loans and taking custody of clients’ chips
or money to gamblers from Macao and elsewhere. In terms of restricting the flow
of funds subject to foreign exchange controls, the services provided by these
junket promoters are extremely convenient both for overseas gamblers and local gambling operators. However, the convenience of obtaining gambling credit makes it easier for players to engage in excessive gambling activities. Therefore, when implementing a maximum limit, it could be beneficial to require borrowers to submit a valid credit report to the junkets, which could in turn be subject to regulations limiting the ratio of credit they can concede to the credit report, thereby helping gamblers avoid engaging in excessive gambling.

ii. Launching More Detailed “Responsible Gambling” Measures

In response to the development of the gaming industry in Macao, the MSAR Government has formulated and revised the respective laws in a timely manner and fulfilled its role as a leader and policy maker. In the future, we recommend that the MSAR Government studies and formulates even more detailed measures on “Responsible Gambling” such as requiring that a compulsory message appears on the screen of a slot machine or electronic betting terminal after a certain amount of betting is reached to make the gambler confirm that he or she genuinely wishes to continue placing a bet. In the same way, when the betting amount reaches a certain level, dealers could also be obliged to verbally ask gamblers to confirm the bets they place, which would not only provide a timely intervention for gamblers, but also strengthen the effectiveness of “Responsible Gambling”. Moreover, as studies show that being aware of “Responsible Gambling” helps raise awareness of related issues,9 we recommend providing frequent gamblers with a more focused education on relevant topics. Meanwhile, to more accurately identify individuals who have been excluded from entering casinos, as well as prevent gaming employees from entering casinos during their non-working hours, we recommend that gambling operators fully incorporate facial recognition systems to strengthen security and cooperate with the government in the application of smart technology in order to enhance enforcement capabilities. To respond to the increase in the number of online gambling addiction cases in recent years, we recommend improving the use of online platforms to promote the message of “Responsible Gambling”.37

iii. Promoting “Responsible Gambling” to Higher Education Institutions in Macao

Although the government and community organizations have taught primary and secondary students about the proper value of money, as well as how to avoid gambling, they have not yet extended these services to higher education institutions. The personalities of higher education students are maturing and they will reflect upon their upbringing and family environment. As such, there are
situations in which these students will proactively seek help when a member of their family shows the symptoms of gambling disorder. One gambling disorder counselling organization indicated that, as children, higher education students achieved better results helping their family members compared to spouses. Therefore, we recommended extending the promotion of “Responsible Gambling” to higher education institutions.37

iv. Conducting Surveys on Gambling Tourists

More than 30 million tourists visit Macao every year.24 A survey revealed that about 30% of these tourists participated in gambling activities. The number of tourists who engage in gambling far exceeds the number of local residents who partake in such activities. In view of this, the entities who organize promotional activities related to “Responsible Gambling” have, since 2017, expanded their target audience to include tourists as well as local residents, along with counselling services and publicity campaigns. However, since there are currently no surveys on the gambling behaviours and awareness of “Responsible Gambling” that focus on tourists to Macao, it is difficult to provide targeted publicity and relevant services to tourists. Therefore, we recommend that academic institutions should conduct research in this area in order to gain a more comprehensive understanding about the situation of gambling tourists so as to avoid them bringing negative impacts back home. It should be noted that tourists are a mobile target group and therefore similar surveys conducted at different times are not comparable.

v. Coordinating with the Development of the Greater Bay Area and Strengthening Regional Cooperation

The ever-increasing integration of the Guangdong-Hong Kong-Macao Greater Bay Area has brought about more frequent and closer exchanges between those who reside in these three locations. Given that Macao has a deep-rooted image as a gambling capital in the hearts of many people, it is imperative that the concept of “Responsible Gambling” become just as entrenched, otherwise it could pose a considerable obstacle to Macao’s future integration into the Greater Bay Area. Therefore, Macao should take the initiative and focus on promoting “Responsible Gambling” to potential tourists and in this way prevent the occurrence of gambling disorders. To achieve this goal, regular regional cooperation meetings can be conducted between Macao and the other cities in the Greater Bay Area. By using Macao’s decade-long experience in promoting “Responsible Gambling,” the local cultures and traditions of the Greater Bay Area
can be combined and a promotional strategy that suits the needs of the Greater Bay Area can be found. We also recommend establishing a network with institutions in the Greater Bay Area to prevent and treat gambling disorders, as well as study the feasibility of developing a referral mechanism for applying the exclusion measures.

2. In order to assess the prevalence of problem/pathological gambling, survey conducted in 2013 or before was based on the Diagnostic and statistical manual of mental disorders 4th edition, APA, 1994 published by the American Psychiatry Association · APA (“DSM-IV” for short). The definition and the diagnostic criteria of the problem/pathological gambling behaviour were applied in these studies. Later the Association published the 5th edition of the Diagnostic and Statistical Manual of Mental Disorders, APA, 2013 (“DSM-5 for short). In 2016, the survey used DSM-5 to assess the prevalence of gambling disorders.
3. The Legislative Council of the Macao Special Administrative Region (June, 2015). *Legal compilation – The law regulates the conditions for entering casinos and working and gambling on the premises*. Page 15. Macao: The Legislative Council of the Macao Special Administrative Region.
4. Data was retrieved on 22nd November, 2018 from the website of the Gaming Inspection and Coordination Bureau – Responsible Gambling – Quarterly Data of Casino Exclusion Applications.
13. Data on “Responsible Gambling Kiosk / Station” was retrieved on 22nd November, 2018 from the website of the Social Welfare Bureau – Problem Gambling Prevention and Treatment Division – “Responsible Gambling Kiosk” and “Self-Exclusion”.
37. Sharing from community organizations during “Responsible Gambling” Promotions meeting.
38. The Legislative Council of the Macao Special Administrative Region (June, 2015). Legal Compilation – The law regulates the conditions for entering casinos and working and gambling on the premises. Page 15. Macao: The Legislative Council of the Macao Special Administrative Region.