



December 11, 2013

The Director
Strategic Communications Unit
Department of the Premier and Cabinet
GPO Box 2343
Adelaide, SA 5001

Dear Director,

RE: nogame.sa.gov.au billboard advertising

The Interactive Games & Entertainment Association (**IGEA**) is an industry association representing the business and public policy interests of Australian and New Zealand companies in the computer and video game industry. IGEA's members publish, market, develop and/or distribute interactive games and entertainment content and related hardware.

The South Australian Government has launched its policy relating to gambling, video games and classification with the details of such policy set out on the www.nogame.sa.gov.au website. IGEA has since written to the South Australian Premier highlighting that, while we don't directly oppose the introduction of gambling as a classifiable element at a national level, further research and public consultation is required. Furthermore, we emphasised that we should avoid any further ad hoc changes to the scheme, but rather allow this issue to act as a catalyst to address the much needed fundamental overhaul to the National Classification Scheme.

We have recently been made aware of an advertising campaign for the www.nogame.sa.gov.au website that fails to comply with the Marketing Communications and Advertising Guidelines published in March 2013 by the South Australian Government (the **Guidelines**).

Set out below is an outline of the relevant parts of the Guidelines followed by the particulars of our complaint.

Outline of Guidelines

The Guidelines represent the basic principles to be followed by all government officers when planning, developing and managing advertising communication on behalf of government agencies, administrative and business units and instrumentalities of the Crown that are subject to Ministerial direction.

The Guidelines apply to outdoor advertising, including billboards, posters and signage initiated by a government agency or on the agency's behalf.

The Guidelines clearly state that the use of public funds for Government communication programmes should be governed by several key principles, including that:

- The Government has responsibility for ensuring equity, fairness, probity appropriateness and public responsibility in all of its communications; and

- Communication material should be produced and distributed in an efficient, effective and relevant manner with due regard to accountability.

Approval from the Premier's Communications Advisory Group (**PCAG**) is required for all marketing communication, advertising, public information and promotional campaigns including outdoor advertising, regardless of the value of the activity, undertaken by Government departments, agencies and operating units. Throughout this review process, the PCAG is expected to ensure that the advertising and communications campaign complies with a number of Government policies, including the Guidelines.

The Guidelines emphasise that the Government of South Australia requires that all government communications comply with the highest standards of fairness, equity, probity and public responsibility. More particularly, the Guidelines state that all government communications must ensure:

- Accuracy and objectivity in the presentation of all facts, statistics, comparisons and other arguments, ensuring that the source of all data is indicated or that a means for identifying the data source is provided within the communication
- All statements, claims and arguments included in the communication are able to be substantiated

Complaint Particulars

On 10 December 2013 we were made aware of an outdoor billboard advertising campaign for the website www.nogame.sa.gov.au in South Australia. A photo of the billboard is attached and marked Annexure A (the **Billboard**).

The Billboard displays an image of a young child wearing sunglasses and holding a tablet computer while being surrounded by gambling items, including poker chips, playing cards and what appears to be a poker table. The words 'GAMBLING starts with GAMES' are displayed in large bold text above the child. The bottom of the Billboard cites the www.nogame.sa.gov.au website and displays the South Australian Government logo.

There are a number of representations that are likely to be interpreted by the Billboard, including:

- that playing games, including tablet computer games, leads to gambling; and
- that playing simulated gambling games leads to gambling.

Both of these representations are inaccurate and unsubstantiated. The most recent research cited by the www.nogame.sa.gov.au website specifically states that:

"This study does not suggest that simulated gambling precedes or follows monetary gambling."¹

Furthermore, the author of the most recent research cited by www.nogame.sa.gov.au in 2012 stated the following:

¹ King, D. L., Delfabbro, P. H., Kaptsis, D., & Zwaans, T. Adolescent simulated gambling via digital and social media: An emerging problem. *Computers in Human Behavior* (February 2014, Volume 31, pages 305-313)

“It should be recognized that any sort of gambling during adolescence does not necessarily lead to gambling during adulthood. Although early exposure may familiarize young people with gambling, it does not always follow that involvement or interest in gambling at a younger age will be associated with subsequent gambling”²

IGEA considers the Billboard to have failed the standard requirements in the Guidelines, namely the requirement that government communications and advertising ensure:

- Accuracy and objectivity in the presentation of all facts, statistics, comparisons and other arguments, ensuring that the source of all data is indicated or that a means for identifying the data source is provided within the communication; and
- All statements, claims and arguments included in the communication are able to be substantiated.

The statement on the Billboard is highly inaccurate and the advertisement fails to source any relevant data. Furthermore, the existing research simply does not substantiate the statement made on the Billboard.

IGEA Requests

IGEA supports a healthy dialogue of political debate on matters as serious as classification and censorship. We have recently written to the Premier to share our perspective on the issue raised by the campaign however we are incredibly disappointed with the direction this campaign is taking.

We expect the communications on this matter to be more responsible and focused on the issue at hand with statements that can be substantiated by evidence.

In a time where the culture of playing video games has reached critical mass, with 93% of Australian households having a device for playing computer games³, such a broad and unsubstantiated attack on ‘games’ is likely to trigger unwarranted concerns amongst millions of game playing Australian families. This type of communication is also highly damaging to Australia’s interactive entertainment industry - an industry that continues to work cooperatively, respectfully, responsibly and proactively on matters of public concern including classification.

IGEA requests the following action to rectify the damage caused by the Billboard:

- a) the immediate removal of all copies of the image displayed on the Billboard from public display, including from all outdoor advertising, websites and publications;
- b) a written statement from the South Australian Government published on the South Australian Premier’s website and the www.nogame.sa.gov.au website to rectify the breach of the Guidelines, including an acknowledgment of the removal of the Billboard images and an acknowledgement that there is no

² King, D. L., et al (2012) *A review of Australian classification practices for commercial video games featuring simulated gambling*, International Gambling Studies, 12:2, 231-242

³ Brand J.E., Lorentz P, Mathew T, (2013) *Digital Australia '14*, Sydney: Interactive Games & entertainment Association

evidence that suggests a causal connection between playing games, including simulated gambling games, and gambling;

- c) written confirmation of the completion of both a) and b); and
- d) the South Australian Government's reassurance that such inaccurate and unsubstantiated claims will not be repeated.

We expect a timely response to this matter before close of business **Friday 20 December 2013**.

Kind regards,



Ron Curry
Chief Executive Officer
Interactive Games & Entertainment Association

www.igea.net

Suite 145, National Innovation Centre
Australian Technology Park
4 Cornwallis St, Eveleigh NSW 2015



Annexure A

Photo of Billboard reported to have been taken at the Colonnades Shopping Centre in South Australia⁴



⁴ <http://www.gizmodo.com.au/2013/12/why-is-south-australia-still-demonising-video-games/>