

**30<sup>th</sup> November 2023**

**Submission to Rural City of Wangaratta – re draft Gambling Policy and Gambling Action Plan.**

Thank you for the opportunity to provide feedback on the Rural City of Wangaratta – Draft Gambling Policy and Draft Gambling Action Plan. Meaningful, specific and proactive gambling harm prevention policies are crucial to the health and wellbeing of both individuals and the community.

Councils can influence the conditions needed for good health, such as the natural, built and social environments in which people live, learn, work and play<sup>1</sup>. They have a major role in supporting the objectives of the Victorian Public Health and Wellbeing Act 2008<sup>2</sup> by protecting, improving and promoting public health.

This response to the draft Gambling Policy and Action plan is informed by feedback from the Health Promotion and Gambler's Help teams at Gateway Health. This response is also supported by reference to policy documents from other Victorian Local Government areas, which are all governed by the same state legislation. As well, this response is substantiated by evidence from a range of research from peak bodies, as well as direct consultation with Alliance for Gambling Reform (AGR) Victorian Local Governance Association (VLGA), Municipal Association of Victoria (MAV), Victorian Health Promotion Foundation and the Victorian Responsible Gambling Foundation (VRGF).

Gateway Health acknowledges that the harm inflicted on individuals and communities by gambling needs to be tackled at all levels of government. Local government however has a crucial role in both planning and providing strong advocacy for measures to reduce gambling harm. It is heartening to see Victorian councils such as Hume City Council and Monash City Council utilising all the levers available to local government, which include taking on a strong advocacy role that has clearly influenced relevant state government legislation<sup>3</sup>.

Gambling harm arises from a complex interplay of factors, at numerous levels. There are multiple factors at work in the development of gambling harms at the population level, including individual psychological and behavioural factors such as stressful living circumstances, socioeconomic conditions, environmental factors such as the relative availability and proximity of gambling opportunities, technological factors including the nature and relative intensity of gambling technologies available, educational opportunities, employment opportunities, the availability of alternative recreational and entertainment opportunities, and the regulatory environment.<sup>4</sup> Approaches to gambling harm prevention and reduction need to be cognisant of this complexity, and address factors such as these via effective multi-factorial interventions<sup>5</sup>. Often, but not always, gambling harm co-relates with or causes poor mental health, family violence and substance harm<sup>6</sup>. It can also happen in isolation.

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<sup>1</sup> VicHealth, Reducing harm from alcohol - Local government action guide

<https://www.vichealth.vic.gov.au/sites/default/files/Alcohol-LGA-Action-Guide.pdf>

<sup>2</sup> Victorian Government, Public Health and Wellbeing Act 2008

<https://content.legislation.vic.gov.au/sites/default/files/2023-08/08-46aa062-authorised.pdf>

<sup>3</sup> Hume City Council <https://www.hume.vic.gov.au/Residents/Latest-News/News-and-Media-Releases/2023/Hume-City-Council-drives-change-in-reducing-gambling-harm>

<sup>4</sup> Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, [Assessing gambling-related harm in Victoria: a public health perspective](#), Victorian Responsible Gambling Foundation, Melbourne.

<sup>5</sup> Victorian Responsible Gambling Foundation, Gambling Harms Scales

[https://responsiblegambling.vic.gov.au/documents/1206/RES0118\\_The\\_Gambling\\_Harms\\_Scales.pdf](https://responsiblegambling.vic.gov.au/documents/1206/RES0118_The_Gambling_Harms_Scales.pdf)

<sup>6</sup> Royal Commission into Mental Health <http://rcvmhs.archive.royalcommission.vic.gov.au>

## **Feedback on Draft Gambling Policy**

### **Section 1 - Statement and Purpose:**

One of the key objectives is to *protect those most vulnerable to the social and economic harms caused by gambling*. Anyone can experience gambling harm, in fact the availability of gambling, along with participation and frequency of gambling alone can increase risk<sup>7</sup> To help the community understand that anyone can experience gambling harm and reduce stigma it would be beneficial to change the wording to reflect this. For example: One of the key objectives is to safeguard the community, including those at higher risk, from the social and economic harms of gambling.

The second key objective of *maximising opportunities for gambling activities to deliver social and economic benefits* is unclear and may conflict with the policy's overall purpose, which is to delineate the Council's future strategy for safeguarding and minimising social and economic harms to the Wangaratta community from gambling. Simply put, maximising opportunities for gambling activities will not deliver social and economic benefits to the local community, in fact, gambling activity is known to create social costs. The Victorian Responsible Gambling Foundation found a conservative estimate of a \$7 billion annual social cost of gambling to Victoria,<sup>8</sup> with family and relationship problems being the highest at \$2.2 billion, followed by emotional and psychological issues at \$1.6 billion, including distress, depression, suicide, and violence, and financial harms ranking third at \$1.3 billion,<sup>9</sup> it is crucial to reassess and align the policy to acknowledging and incorporating these significant social and economic concerns.

Gambling costs primarily arise from redistributing wealth from gamblers, both low and moderate risk, and problematic, to various entities, including government and industry. Research indicates that 75% of the total gambling cost is borne by gamblers, their families, and social networks.

Research indicates that gambling generates disproportionate costs in relation to the industry's size, tax revenue, and assumed recreational value for Victorians.<sup>10</sup>

Finally, in relation to this objective, Gateway Health encourage the Council to align Policy focus with Victorian Gambling and Casino Control Commission (VGCCC) and the Victorian Responsible Gambling Foundation (VRGF) objectives, *whose aims are to prevent, reduce and minimise harm from gambling, recognising that gambling causes harm and that such harm is not limited to 'problem gamblers'*.<sup>11</sup>

Statistics shows that gambling generates no net economic benefit, as jobs generated by gambling are balanced by declines in expenditure and employment in other fields of industry. In addition, less than five cents for every dollar lost to gambling by residents is returned to the local community<sup>12</sup>.

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<sup>7</sup> [VRGF Population Study 2018-2019 - Fact Sheet 8 - Gambling Frequency and Harm](#)

<sup>8</sup> Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M 2017, [The social cost of gambling to Victoria](#), Victorian Responsible Gambling Foundation, Melbourne.

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> VGCCC, Our Position on Gambling Harm - [https://www.vgccc.vic.gov.au/sites/default/files/our\\_position\\_on\\_gambling\\_harm.pdf](https://www.vgccc.vic.gov.au/sites/default/files/our_position_on_gambling_harm.pdf)

<sup>12</sup> City of Greater Dandenong <https://www.greaterdandenong.vic.gov.au/gambling-social-statistics>

Research from Monash University demonstrates that:

- Benefits of gambling accrue to corporations, their shareholders, and governments (often without redress for affected communities).
- Gambling diverts expenditure from alternative uses:
  - Local businesses experience significant disadvantage in competing with gambling subsidised food and drink
  - Significant consumption expenditure is diverted
  - Gambling, especially automated gambling, is not highly productive of employment, especially compared to other consumption expenditure<sup>13</sup>.

The VLGA makes a very pertinent point in relation to this draft policy's objective about *maximising opportunities for gambling activities to deliver social and economic benefits*. Policies should aim to decrease losses from gambling, not increase the "community benefit". The VLGA warns that: *'a focus on maximising "benefits" is counter to good public health practice. In some cases, councils that have sought to maximise benefits from poker machine operators have found their decision making compromised when it comes to dealing with applications<sup>14</sup>'.*

If the aim of this objective is to ensure that local clubs that currently have gambling machines meet the requirements of the Community Benefits Statement required by the VGCCC then this should be made clearer. Council could advocate that all monies claimed under community benefit statements locally should be directly reinvested with community groups and community-led initiatives within the Rural City of Wangaratta local government area that are addressing the precursors for or impacts of gambling harm.

## Section 2, Scope:

The scope section acknowledges that *whilst there are many different forms of gambling, the most predominant source of financial loss and harm in Australia comes from EGMs*.

To further strengthen this point, and to give more context to the reader, statistics and references could be added. Suggested wording could read:

It is important to emphasise that Electronic Gaming Machines (EGMs), otherwise known as pokies, have the most impact in terms of inflicting gambling related harm<sup>15</sup>. Also, most significant, it is the area that local government authorities can have the most influence<sup>16</sup>.

In this section the policy outlines Councils obligations under the Planning and Environment Act 1987 and the Rural City of Wangaratta Planning Scheme. This section could be strengthened by being

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<sup>13</sup> Monash University [https://research.monash.edu/files/325507035/284038181\\_oa.pdf](https://research.monash.edu/files/325507035/284038181_oa.pdf)

<sup>14</sup> Victorian Local Governance Association [www.vlga.org.au/sites/default/files/VLGA03-Local-Govt-Policy-for-distribution15816.pdf](http://www.vlga.org.au/sites/default/files/VLGA03-Local-Govt-Policy-for-distribution15816.pdf)

<sup>15</sup> Victorian Responsible Gambling Foundation <https://responsiblegambling.vic.gov.au/resources/publications/victorian-population-gambling-and-health-study-2018-2019-759/> and [https://responsiblegambling.vic.gov.au/documents/763/VRGF\\_Population\\_Study\\_2018-2019\\_Fact\\_Sheet\\_4\\_4SmgROB.pdf](https://responsiblegambling.vic.gov.au/documents/763/VRGF_Population_Study_2018-2019_Fact_Sheet_4_4SmgROB.pdf)

<sup>16</sup> City of Monash Public Health Approach to Gambling Policy <https://www.monash.vic.gov.au/About-Us/Corporate-Strategies-Plans/Plans-and-Strategies/Public-Health-Approach-to-Gambling>

more explicit in the role Council can have in reducing harm from gambling. An example of this can be seen in an excerpt from the City of Ballarat Gambling Harm Policy:

*Clause 52.28 of the Victorian Planning Provisions under the Planning and Environment Act 1987 provides a statutory responsibility for councils to consider the social and economic impacts of gaming machines in their municipality. The Gambling Regulation Act 2003 enables local government to make submissions to the Victorian Gambling and Casino Control Commission (VGCCC) in the form of a social and economic impact assessment (SEIA) for potential new applications for EGMs within its municipality or a neighbouring municipality<sup>17</sup>.*

The way the draft policy is divided into four different pillars, makes the document clearer for the reader to understand and identifies the actions Council will undertake.

In the first pillar *manage and support*, the policy states: *Council will manage gambling activities on Council owned land, build the community's capacity to engage in healthy lifestyles and support the gambling industry to reduce its reliance on revenue derived from gambling.*

The above statement is currently unclear. Suggested wording could read:

The Council will appropriately proactively prevent or manage all forms of gambling on Council-owned land and will support community groups, organisations and businesses offering gambling products in reducing reliance on gambling-derived revenue. In addition, Council will build the community's capacity to engage in healthy lifestyles.

Specifically, bingo and raffles are often conducted by community groups in efforts to create social environments or to fundraise for local charities/causes. It could be identified that Council is not looking to prohibit bingo or raffles, instead Council wishes to ensure that harm from these activities is minimised and will work with clubs and community groups to ensure the activities are carried out in a way that prevents opportunity for harm.

The Council can re-orient prevention by recognising the important intersection of bingo and other gambling modalities, the links between bingo, other forms of gambling and gambling harm, and the impacts of disadvantage and trauma on bingo harm.

Engaging with diverse groups of bingo and other gamblers, including Indigenous people, culturally diverse communities and older individuals, underscores the importance of addressing their unique experiences. Recognising differences in gambling experiences, particularly between young and older individuals, is essential.

For gaming venues, the concern lies in both for-profit and not-for-profit bingo, where it serves as a 'loss leader' to attract people to venues where other primary gambling activities are available.

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<sup>17</sup> City of Ballarat Gambling Harm Minimisation Policy [www.ballarat.vic.gov.au/sites/default/files/2022-04/Gambling%20Harm%20Minimisation%20Policy%202022%20Final.pdf](http://www.ballarat.vic.gov.au/sites/default/files/2022-04/Gambling%20Harm%20Minimisation%20Policy%202022%20Final.pdf)

### Section 3, Policy:

Taking an evidence-based public health approach to the prevention of gambling harm includes the use of accurate, evidence-based, and non-stigmatising language.

Gateway Health welcomes the commitment to reframing gambling related harm and using terminology more in line with a public health approach, for example, people harmed by gambling, in place of problem gamblers (Pg 3 of the draft policy).

The policy title should reflect the aim - gambling harm minimisation. It is interesting to note that many other Victorian council policies taking a public health approach have used the title - 'Gambling Harm Minimisation Policy', rather than 'Gambling Policy'. A further way to reframe gambling harm is to acknowledge it in the title of the policy.

The first sentence of this section reads, *Council acknowledges that while gambling is a legal form of entertainment that is associated with some benefits, it also causes significant harm to vulnerable members of our community.* As outlined in feedback on the *Statement and Purpose* section, this sentence appears to be at odds with a public health approach.

The draft policy takes the approach of outlining both internally and externally focused work to reduce gambling related harm. This helps to streamline all work being undertaken in this area.

In the final paragraph of 3. Policy, Council acknowledges other forms of gambling including 'low risk forms like raffles and Bingo'. It must be acknowledged that Bingo accounts for 4% of harm in Victoria and that this harm risk is linked to digitisation, jackpots and close proximity of pokies.<sup>18</sup> Safeguarding the community from emerging Bingo enterprises and assisting clubs and community groups to minimise the risk of harm when using these forms of gambling for fund raising is recommended.

In the Scope section of the policy, it is clarified that the document will outline Council's position on gambling and will guide Council's roles and responsibilities in relation to all forms of gambling within the Rural City of Wangaratta. However, the current policy document overlooks some key gambling harm issues that can be more thoroughly addressed in the Action Plan. These include Council's commitment for addressing 1) the exposure to gambling advertising, particularly impacting children and young people, 2) the existing harm experienced by individuals under 18, 3) the accessibility of online and interactive gambling products with characteristics resembling gambling, and 4) the association of race and sports betting with significant harm.

It is crucial to address these gaps to strengthen the Wangaratta Gambling Policy and Action Plan effectively because:

1) Prolific gambling advertising: Victorians are constantly exposed to saturation levels of gambling ads across all media. Exposure to gambling ads normalises betting and increases the risk of harm. Current restrictions have failed to reduce children and young people's exposure to gambling, especially sports betting, which they think is normal.<sup>19</sup>

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<sup>18</sup> Maltzahn, K., Whiteside, M., Thompson, A., Kirirua, J., Cox, J., Lee, H., & MacLean, S, (2021). Lucky for some: bingo in Victoria, Victorian Responsible Gambling Foundation, Melbourne. [https://responsiblegambling.vic.gov.au/documents/975/VRGF\\_RR\\_LFS-BingoVIC\\_publish.pdf](https://responsiblegambling.vic.gov.au/documents/975/VRGF_RR_LFS-BingoVIC_publish.pdf)

<sup>19</sup> Brett Hetherington and Tony Phillips 2023, [Discussion paper: Gambling harm and the online gambling environment](#), Victorian Responsible Gambling Foundation, Melbourne.

2) Under 18's already experience gambling harm: The findings of the 2017 ASSAD survey included that nearly a third (31 per cent) of Victorian secondary students had gambled, of which 38 per cent had bet on sport.<sup>20</sup> Similarly, national research undertaken by the Australian Institute of Family Studies shows that 6 per cent of people aged 16 and 17 have bet on sport in the past 12 months. ACMA research found that 72 per cent of parents are 'bothered' by their children's exposure to gambling ads.<sup>21</sup> Other research highlights that parents struggle to combat the advertising and to prevent the normalisation of gambling among their children.<sup>22</sup>

3) Newer online and interactive gambling products that exhibit many of the characteristics of gambling are also readily available online: These include loot boxes within games and wagering on in-game products and features (called skins betting). Many online games either simulate gambling or contain features that mimic or work in ways similar to features associated with gambling harm.<sup>23</sup> The research suggests that games and products of this type can normalise gambling for children and create pathways into underage gambling as well as harmful gambling in adulthood<sup>24</sup>

4) Race and sports betting are included among the gambling products most associated with harm in Australia: While efforts to reduce harm from gambling are applicable to many types of gambling, the evidence of high occurrences of harm among those who gamble on races, sport, pokies and table games, combined with numbers of those estimated to use those products,<sup>25</sup> make them legitimate priorities for action to reduce the harm they cause.

The rapid expansion of online wagering across various platforms and technologies is a crucial concern for enhancing the Wangaratta Gambling Policy and Action Plan. Similarly, careful consideration is needed to mitigate risks associated with simulated gambling and gambling-like products in video game content and their link with gaming to gambling.

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<sup>20</sup> Freund, M, Noble, N, Hill, D, White, V, Evans, T, Oldmeadow, C & Sanson-Fisher, R 2019, [The prevalence and correlates of gambling in secondary school students in Victoria](#), Australia, 2017, Victorian Responsible Gambling Foundation, Melbourne.

<sup>21</sup> ACMA, 2019, [Gambling advertising in Australia: Consumer and advertising placement research](#), Canberra.

<sup>22</sup> Thomas, S. (2014). [Parents and adolescents discuss gambling advertising: A qualitative study](#), Victorian Responsible Gambling Foundation, Melbourne.

<sup>23</sup> Victorian Responsible Gambling Foundation, Submission to Parliament of Australia, Senate Environment and Communications References Committee, in relation to Gaming micro-transactions for chance based items, 27 July 2018. Victorian Responsible Gambling Foundation School Education program infographic (2021), Loot boxes: how children are being exposed to gambling-like harm in video games.

Rockloff M et.al. (2020), Loot Boxes: Are they grooming youth for gambling? CQUniversity report.

Browne B. (2020) Gambling on Games, Australia Institute.

Steinmetz F. et.al. (2021) Pay-to-Win Gaming and its Interrelation with Gambling Journal of Gambling Studies, May.

Stark, S., Reynolds, J., & Wiebe, J. (2020). Gambling and gaming in an Ontario sample of youth and parents. Journal of Gambling Issues, 46.

Derevensky, J. & Griffiths, M.D. (2019). The convergence between gambling and gaming: Does the gambling and gaming industry have a responsibility in protecting the consumer? Gaming Law Review.

<sup>24</sup> This is a reference to these types of games, not to digital games generally. The evidence that excessive gaming of itself is associated with pathways to gambling and gambling harm is weak. See Paul Delfabbro and Daniel L. King (2020), Gaming-gambling convergence: evaluating evidence for the 'gateway' hypothesis International Gambling Studies, May 2020.

<sup>25</sup> The Victorian population gambling and health study 2018–2019 estimated 9.6 per cent of adults participated in sports betting and 16.8 per cent participated in race betting. This compares with 16.4 per cent participation on EGMs and 6 per cent participation on casino table games. Hing, N., Russell, A. M. T., Browne, M., Rockloff, M., Greer, N., Rawat, V., Stevens, M., Dowling, N., Merkouris, S., King, D., Breen, H., Salonen, A., & Woo, L. (2021). [The second national study of interactive gambling in Australia \(2019–20\)](#). Melbourne: Gambling Research Australia Fig 4.5 p.96.

### Section 7, Human Rights:

Even though the draft policy does cite the Victorian Charter of Human Rights and Responsibilities Act 2006, it could go further by making clear the connection between this draft policy and relevant sections of the Charter.

*Council, Councillors and members of Council staff are a public authority under the Charter of Human Rights and Responsibilities Act 2006 and, as such, are all responsible to act in accordance with the Victorian Charter of Human Rights and Responsibilities 2006 (the Charter).*

In particular, *Section 17 of the Charter – Right to the protection of families and children - whose welfare can be compromised by the destructive impacts of gambling in our community*, is directly relevant to the draft Gambling Policy.

In clearly identifying that gambling harm is outlined in the Charter of Human Rights and Responsibilities Act, it highlights the impact gambling harm can have on communities, and why all levels of government must act in order to address this issue.

### Section 8, Gender Impact Assessment:

The draft policy mentions The Gender Equality Act 2020, of which all Councils are mandated to take into account when developing policies.

Part 3, Section 9 of The Gender Equality Act 2020 states that:

*'A defined entity must undertake a gender impact assessment when developing or reviewing any policy of, or program or service provided by, the entity that has a direct and significant impact on the public.'*

The impact of gambling in the community does exhibit a gendered impact, as outlined in Gambling Harms section of the Action Plan.

Recent Australian studies have found that up to half of people with gambling problems and their family members report some form of family violence (largely affecting women and children) in the previous 12 months<sup>26</sup>.

This section of the policy could be strengthened by providing some detail into how this policy was considered, and satisfies the Gender Equality Act.

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<sup>26</sup> Australian Institute on Family Studies <https://aifs.gov.au/resources/policy-and-practice-papers/impact-gambling-problems-families>



## **Feedback on Draft Gambling Action Plan:**

According to the Victorian Local Governance Association (VLGA), best practice gambling harm policies must include current data, evidence, research and practice<sup>27</sup>. Having both the draft Gambling Policy and draft Gambling Action Plan (which includes local statistics) available at the same time, enables stakeholders and members of the community to more fully understand the importance of this policy and the data that underpins it. The draft Gambling Action Plan begins with citing exactly how the draft Gambling Policy aligns with clear actions in both the *Community Vision* document, and the *Council Plan* – this shows clear alignment and demonstrates Council's commitment to this issue.

This section of the action plan could be further strengthened by:

- Including a summary of the key themes and/or principles from the stakeholders involved in the consultation Wangaratta Council has already undertaken in preparing this draft policy, as noted on Pg 4 of the Policy.
- While the information in the *Background* section of the Action Plan touches on explaining gambling related harm, it could be more specific. For example. *Gambling related harm can have a range of extremely detrimental effects on both individuals and the community generally*<sup>28</sup>. *These include financial harm, negative impacts on physical and mental health, serious relationship problems including family violence, reduced performance at work and study, negative cultural impacts and a potential increase in crime*<sup>29</sup>.
- Highlighting the importance of taking action: Wangaratta LGA has observed a notable increase in losses to Electronic Gaming Machines (EGMs) for the 2022-23 period among the 487 clubs and pubs in Victoria, ranking within the top 10.<sup>30</sup>

## **Section 1 -Manage and support**

Some suggested changes to enhance this section, as well as create clarity for the actions, are:

### ***1.1 Continue to promote a variety of non-gambling events, activities and programs that encourage residents to lead active and healthy lives.***

Councils can have a critical role in creating and promoting safe, inexpensive alternatives to gambling<sup>31</sup>, such as the activities conducted at the municipal libraries under the 'Libraries after Dark' program<sup>32</sup>, which a number of other Victorian councils offer. These alternative activities to gambling need to be tailored to each priority population. Further, members of these priority populations need to participate in the co-design to ensure their needs are met and these activities are utilised and effective.

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<sup>27</sup> Victorian Local Governance Association [www.vlga.org.au/sites/default/files/VLGA03-Local-Govt-Policy-for-distribution15816.pdf](http://www.vlga.org.au/sites/default/files/VLGA03-Local-Govt-Policy-for-distribution15816.pdf)

<sup>28</sup> Victorian Responsible Gambling Foundation <https://responsiblegambling.vic.gov.au/resources/publications/discussion-paper-gambling-harm-and-the-online-gambling-environment-1145>

<sup>29</sup> Victorian Responsible Gambling Foundation <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/gambling-harm-victoria/types-harm-gambling/>

<sup>30</sup> Calculated based on VGCCC EGM expenditure figures access from - <https://www.vgccc.vic.gov.au/resources/information-and-data/expenditure-data>

<sup>31</sup> Victorian Responsible Gambling Foundation [https://responsiblegambling.vic.gov.au/documents/1057/Prevention\\_Partnership\\_Program\\_summary\\_evaluation\\_report.pdf](https://responsiblegambling.vic.gov.au/documents/1057/Prevention_Partnership_Program_summary_evaluation_report.pdf)

<sup>32</sup> <https://www.librariesafterdark.com.au/overview> and <https://www.vlga.org.au/governance-leadership/gambling/libraries-after-dark>



Current wording: *1.3.1 Maintain independence from the gambling industry by*

*prohibiting advertising and/or the promotion of gambling of any form at Council owned or managed facilities.*

Suggested wording: Maintaining independence from the gambling industry by prohibiting advertising and/or promotion of gambling of any form at Council owned or managed facilities as well as prohibiting advertising/promotion of gambling by any club or group that receives council funding or uses council owned or managed facilities.

*1.3.2 Prohibiting any form of gambling, including online gambling, on Council owned and managed land.*

Gateway Health fully supports this.

Current wording: *1.3.3 Discouraging the procurement of products and services from entities which derive revenue from gambling activities.*

Suggested wording: Prohibit procurement of products and services from entities which derive revenue from gambling activities (to be identified in Council Procurement policies).

Current wording: *1.3.4 Minimising financial support or provision of grants for activities that take place in gambling venues.*

Suggested wording: Prohibit financial support or provision of grants for activities that take place in gambling venues. Also make it clear that council will not hold events in venues that have EGMs.

*1.3.5 Not accepting any new financial or in-kind contributions from the gambling industry.*

This point could be read as Council has historically, or currently, accepts financial or in-kind contributions from the gambling industry. If this is the case, a further action item to be included could be a plan to move away from this, including a specific timeframe.

*1.4 Work with community groups and organisations to reduce their financial dependence on revenue derived from gambling sponsorships and gambling activities.*

Gateway Health strongly supports this point. Council could work with clubs to assess any gambling activities they undertake and support members of community groups and organisations to complete gambling harm awareness training to ensure they understand Council's policy on gambling and how activities such as raffles and bingo can be carried out in a way that prevents harm.

One example of a program Council could promote is the Victorian Responsible Gambling Foundation 'Love The Game' program<sup>33</sup>. This is a program which aims to disrupt the normalisation of sports gambling by reducing the exposure of young people to sports betting promotions. Wangaratta Council could promote this program to clubs who use council owned and managed land, this program is already used by over 650 local sporting clubs and schools in Victoria.

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<sup>33</sup> Love the Game <https://lovethethegame.vic.gov.au>

## Section 2 - Partner and advocate

### *2.1 Support advocacy work targeted towards implementation of stronger and more effective harm minimisation measures.*

Although a core part of the scope and role Local government can play in minimising harm from gambling focuses on EGMs, councils can still be effective advocates and communicators about the dangers of all types of gambling and gambling advertising. This includes integrating strategies to address key gambling issues as stated in the policy feedback.

### *2.2 Collaborate with, and contribute to, other local government organisations, local government peak bodies and gambling networks to advocate for reform and develop state-wide advocacy strategies.*

The Municipal Association of Victoria (MAV) has joined with councils and many other organisations as a founding supporter of the Alliance for Gambling Reform<sup>34</sup>. Launched in October 2015, the Alliance seeks to campaign for reforms to the gambling industry to reduce harm from EGMs, and to protect disadvantaged communities from the infiltration of increasing numbers of poker machines. It is strongly recommended that Wangaratta Council join this Alliance to increase their capacity to address gambling related harm, one of the stated objectives of this draft policy. Further, at a recent MAV meeting of the State Council, a motion calling on the Victorian Government to introduce regulatory gambling harms was carried. This included a change to tightening up loop holes around what is considered to be 'community benefit'.

### *2.4 – Advocate for changes to the Community Benefit Statement that require the gambling industry to commit funds to addressing gambling-related harms in the community.*

Be more specific about what changes are required e.g. Council could advocate that all monies claimed under community benefit statements locally must be directly reinvested with community groups and community-led initiatives within the Rural City of Wangaratta local government area and used to address the precursors for or impacts of gambling harm.

## Section 3 - Plan and regulate -

With the outlined adjustments, Gateway Health can support the action items listed in this table.

### *3.1 Where appropriate, integrate strategies to protect the Wangaratta community from gambling-related harm into our strategic planning framework. This includes, but is not limited to, the Council and Health and Wellbeing Plans, Community Vision and the Rural City of Wangaratta Planning Scheme.*

Suggested change: add in specific timelines for reporting back to Councillors and community.

### *3.3 Implement effective leasing arrangements to prohibit gambling activities and advertising on Council owned or managed land.*

Gateway Health strongly supports this point. It could be further strengthened by clearly outlining exactly what education and enforcement of this will look like (refer to below council policies for examples).

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<sup>34</sup> Municipal Association of Victoria <https://www.mav.asn.au/news-resources/campaigns/previous-campaigns/pokies>

*3.4 Discourage new gaming operators and/or additional EGMs in communities vulnerable to gambling-related harm and in communities with limited access to non-gambling activities*  
Suggested change: strengthen by altering 'discourage new gaming/additional EGMs' to similar language to 3.2 by making it clear Council will oppose new gaming/additional EGMs in those vulnerable communities

*3.5 Incorporate conditions in planning permits relating to the design and operation of gaming operators that enhance harm minimisation measures.*

The draft Wodonga Council Gambling policy has included the following planning provision which Gateway Health supports, and could be added to the Wangaratta policy.

*When considering new applications for EGMs, the venue is not located neighbouring or nearby an education facility or premise where the principal activities focus on persons under the age of 18 years.*

There are links between proximity to gambling venues and gambling involvement and harms. Evidence indicates that proximity matters: doubling the distance from one's residence to an EGM gambling venue reduces the likelihood of gambling on games offered in such venues. Residential proximity to gambling venues significantly increases financial hardship and mental health difficulties, especially for residents within very close distances<sup>35</sup>.

A further planning permit consideration relates to the placement of smoking areas and toilet facilities inside EGMs venues. Patrons should not be required to pass through EGMs areas to access these facilities.

Gateway Health strongly recommends that when Wangaratta Council is considering any proposal for additional or new EGMs, a comprehensive, independent, Social and Community Impact Assessment must accompany any such applications. This requirement should also be incorporated into the Planning Scheme.

The draft policy does not highlight Council's role in influencing opening hours of venues with EGMs. Restriction of operating hours is an established, best practice harm minimisation measure in gambling regulation<sup>36</sup>.

Critical actions, such as reducing the operating hours of EGMs must be taken to reduce and prevent gambling harm for the overall health and wellbeing of individuals, families and communities<sup>37</sup>. In line with best practice public health recommendations, the opening hours of gambling rooms that contain EGMs should be restricted between midnight to 10am<sup>38</sup>.

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<sup>35</sup> Victorian Responsible Gambling Foundation [https://responsiblegambling.vic.gov.au/documents/969/VRGF\\_RR-JUNE2021\\_Proximity\\_to\\_gambling\\_venues\\_gambling\\_behaviours\\_and\\_related\\_avlwmAe.pdf](https://responsiblegambling.vic.gov.au/documents/969/VRGF_RR-JUNE2021_Proximity_to_gambling_venues_gambling_behaviours_and_related_avlwmAe.pdf)

<sup>36</sup> Victorian Responsible Gambling Foundation <https://responsiblegambling.vic.gov.au/documents/640/Livingstone-identifying-effective-policy-interventions-June-2019.pdf>

<sup>37</sup> Australian Gambling Alliance, Opening Hours [https://www.agr.org.au/files/ugd/f3b93a\\_10049cd25ed24e53a146a94522294dca.pdf](https://www.agr.org.au/files/ugd/f3b93a_10049cd25ed24e53a146a94522294dca.pdf) and [https://responsiblegambling.vic.gov.au/documents/1030/VRGF\\_Reducing\\_gambling\\_harm\\_in\\_Vic\\_2022\\_FINAL\\_MARCHweb.pdf](https://responsiblegambling.vic.gov.au/documents/1030/VRGF_Reducing_gambling_harm_in_Vic_2022_FINAL_MARCHweb.pdf)

<sup>38</sup> Victorian Responsible Gambling Foundation, <https://responsiblegambling.vic.gov.au/documents/21/using-a-public-health-approach-in-the-prevention-of-gambling-related-harm.pdf>

Young people are increasingly being impacted by the harmful effects of gambling<sup>39</sup>. Victorian schools have reported that they are increasingly tackling the impacts of gambling on students' (as young as 10), education and brain development<sup>40</sup>.

Headspace and Gambler's Help, both based at Gateway Health, strongly advocate for reduced opening hours of spaces with EGMs.

On the 3rd October 2023, the Minister for Casino, Gaming and Liquor Regulation introduced, the *Gambling Legislation Amendment Bill 2023* to Parliament.

This amendment will enforce mandatory closure periods for all gaming machine areas in venues except Crown Casino between 4am and 10am every day from mid-2024, reducing gambling harm by giving people the chance to break from the dangers of endless play. It is the first major step taken by the State Government to reform gambling outside of Crown Casino, but much more still needs to be done to bring in regulation that will significantly reduce gambling harm in Victoria.

The Victorian Gambling and Casino Control Commission (VGCCC) "no net detriment" test, establishes clear requirements for assessing EGM applications, and this test should be integrated into Council's Gambling policy. The VGCCC Harm Minimisation Statement notes that "*The harm experienced by one person is not lessened by any associated benefits accruing to other people*"<sup>41</sup>.

*3.6 Incorporating conditions in planning permits that support the allocation or reallocation of community contributions related to gambling to Gambler's Help or relevant services aimed at reducing harm associated with gambling.*

It is important to clarify that Gateway Health and Gambler's Help funders, the VRGF, do not endorse or accept monetary community contributions for allocation or reallocation. This approach is grounded in ethics and integrity, with a clear view that Gambler's Help and gambling harm support services should not be directly financial supported by gambling industry providers as a means of 'offsetting' any harm resulted from gambling.

Gateway Health recommends directing the funds towards addressing population risk factors, precursors for gambling-related harm, or educational campaigns to raise awareness of gambling risks and harms.

#### Section 4 - Inform and engage

Commitment statement to incorporate a Public Health approach, which ensures Council will act by supporting initiatives to prevent gambling harm, reduce related harms, and minimise the impacts of gambling related harms.

*4.1 Respond to and support gambling-related research, data collection or government enquiries, 4.2 Continue to monitor gambling-related research, evidence, data, legislative or policy changes, and gambling trends, including harm prevention and minimisation, 4.3 Work with and support current EGM venues, relevant organisations, providers, agencies and initiatives to educate the Rural City of Wangaratta community on the overall negative public health impact of gambling and the risks involved with all forms of gambling.*

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<sup>39</sup> Victorian Government <https://new.parliament.vic.gov.au/news/health/youthgambling/>

<sup>40</sup> Coroners Court Victoria & Monash University, Gambling-Related Suicide in Victoria, Australia: A Population-Based Cross-Sectional Study [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4442857](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4442857)

<sup>41</sup> Victorian Gambling and Casino Control Commission <https://www.vgccc.vic.gov.au/our-position-harm-minimisation#:~:text=Harm%20is%20preventable.,of%20harm%20or%20possible%20harm>

Gateway Health, which has expertise and experience in harm reduction related to gambling, would be happy to work in partnership with Wangaratta Council and other local stakeholders to define harm reduction goals as part of the action plans to implement these policies.

There are a number of programs available with the specific intention of addressing gambling related harm. Extend support to the harm reduction and prevention initiatives of the Victorian Responsible Gambling Foundation. These include an increased focus on fostering participation and cultivating partnerships during Gambling Harm Awareness Week, Community Engagement program activities and the Knowing the Score school education program<sup>42</sup>.

*4.4 Maximise opportunities for the community to provide their input into decisions made on planning permit applications and make submissions to the VGCCC on proposed gaming licences.*

Gateway Health supports this point. To make it clearer for both Council and community, more details about exactly how opportunities for input will be maximised this could be included in this section.

Below are examples of other Victorian council gambling policies that address evidence-based public health approaches:

- Nillumbik Shire Council, *Gambling Harm Minimisation Policy*<sup>43</sup>
- Wellington Shire Council, *Electronic Gaming Machine Policy*<sup>44</sup>
- City of Melton, *Gambling Harm Prevention and Reduction Policy*<sup>45</sup>
- City of Monash, *Public Health Approach to Gambling Harm Policy*<sup>46</sup>
- Wyndham City Council, *Gambling Harm Minimisation Policy*<sup>47</sup>
- Greater Dandenong, *Gambling Policy*<sup>48</sup>
- City of Ballarat, *Gambling Harm Minimisation Policy*<sup>49</sup>

Gateway Health recommend further defining the Policy and Action Plans to increase action at local and regional levels, vital to preventing negative impacts on individuals, families, and communities. A comprehensive public health approach to reduce gambling-related harms should involve coordinated upstream and downstream strategies, incorporating advocacy, information sharing, early intervention, and regulation.

To effectively address gambling harms, the Action plan's 4 pillars should detail actions to involve:

- understanding the prevalence and consequences,
- extending concern beyond the gambler to affected individuals, families, and communities.
- requires a commitment to public health, integrating it into strategic plans, setting meaningful outcome measures, and communicating this commitment to partners.
- local agencies should assess available assets and resources, encouraging a coordinated response.

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<sup>42</sup> Knowing the Score [https://responsiblegambling.vic.gov.au/documents/902/VRGF-BAOTG\\_PDS-KnowingTheScore.pdf](https://responsiblegambling.vic.gov.au/documents/902/VRGF-BAOTG_PDS-KnowingTheScore.pdf)

<sup>43</sup> Nillumbik Shire Council <https://www.nillumbik.vic.gov.au/Council/Our-organisation/Strategies-policies-and-plans/Health-and-wellbeing>

<sup>44</sup> Wellington Shire Council <https://www.wellington.vic.gov.au/policies/electronic-gaming-machine-policy>

<sup>45</sup> City of Melton <https://www.melton.vic.gov.au/Council/Publications/Documents-Reports-Strategies>

<sup>46</sup> City of Monash <https://www.monash.vic.gov.au/About-Us/Corporate-Strategies-Plans/Plans-and-Strategies/Public-Health-Approach-to-Gambling>

<sup>47</sup> Wyndham City Council [www.wyndham.vic.gov.au/sites/default/files/2018-06/Gambling%20Strategy\\_Final.pdf](http://www.wyndham.vic.gov.au/sites/default/files/2018-06/Gambling%20Strategy_Final.pdf)

<sup>48</sup> Greater Dandenong <https://www.greaterdandenong.vic.gov.au/gambling-policy>

<sup>49</sup> City of Ballarat <https://www.ballarat.vic.gov.au/city/my-community/gambling-harm>

- raising awareness through compelling narratives and involving those affected is crucial, as many do not recognise gambling as a health harm.
- A 'whole council' approach, integrating with broader and co-relating issues like homelessness and poverty, alcohol and tobacco, family violence is essential in tackling gambling-related harms.

Given the complex nature of gambling harm, an integrated, place-based approach is crucial, involving both statutory and non-statutory sectors, along with communities. Lessons from managing other public health concerns, like alcohol and tobacco, can inform strategies, acknowledging the unique characteristics of gambling, such as rapid technological advances and growth of gaming and on-line gambling is essential to harm minimisation policy. Shifting the focus from 'personal responsibility' to population-level social, economic, and environmental interventions is also essential.

In conclusion, Gateway Health is prepared to actively engage and proposes that the Council collaborates with stakeholders to implement a place-based approach to further define harm reduction actions for inclusion across the 4 pillars in the Action Plan.



**ALLIANCE FOR  
GAMBLING REFORM**

## **Response to Rural City of Wangaratta Draft Gambling Policy & Action Plan**

ALLIANCE FOR GAMBLING REFORM

*December 2023*



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## Introduction

The Alliance for Gambling Reform is a national peak body which represents a collaboration of organisations with a shared concern about the harmful aspects of gambling and its normalisation in Australian culture. We are a registered health promotion charity. The Alliance supports public policy and regulatory regimes that make Australia a safer, healthier, and more equitable society by reducing the level of gambling harm.

We work closely with our [Leadership Councils](#) to support local measures that reduce and prevent gambling harm such as gambling harm prevention policies and advocate for gambling reforms on a state and national level. Local government policies that have a clear commitment to prevent and reduce gambling harm in their communities are an important lever for councils.

We are keen to support you with the implementation of a robust policy to offset these losses and consequent harms in the Wangaratta community.

### *Sentiments of Leanne<sup>1</sup> a Person with Lived Experience of Gambling Harm*

Leanne has been in recovery for five years from the harms of gambling.

*I had never been a gambler. I went on a holiday with my husband and visited a gambling venue. I was instantly addicted. Over ten years it just increased to the point where gambling had taken over my life. It affected my finances and mental health. After five years in recovery, I still see myself as, potentially, a gambling addict. It's like being an alcoholic, you are always one drink away.*

Leanne believes that banning ATM withdrawals, would have helped.

*If you had to go to an ATM somewhere, you may not return to the venue. The thing with gambling is you might go in there saying you'll only spend \$40, but you won't.*

When asked what she thought about gambling venues that "give back" to the community via sports clubs and sponsorships, which she dismissed as "spin". She said:

*It doesn't in any way make up for the social damage caused by gambling. It's more than just the person gambling. It's the family. It's the children going to school without food. It's people suiciding.*

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<sup>1</sup> Name changed for privacy reasons

## Local Wangaratta Context

The Draft Scope of the Policy notes that the electronic gaming machines (EGMs) are *the predominant source of financial loss in Australia*. The Draft Policy and Action Plan incorporates data that aligns with the most significant gambling losses in Australia.

The Alliance understands that the Wangaratta community has been faced with large increased losses from poker machines over the last few years, as demonstrated in the following data, as at July 2023:

	2022/23	2018/19**	Amount	% Change
EGM Gambling Losses 2022/2023	\$10.874 million	\$8.873 million	+ \$2 million	22.5% increase
EGM Gambling Losses per day	\$29,792	\$24,310	\$5,481	
Average losses per EGM	\$70,611	\$57,619	\$12,992	
Average losses per venue	\$2.718 million	\$2.218 million	\$500,000	
Average loss per machine per day	\$193	\$157	\$36	

**\*\* NB:** Current data has been compared to pre-covid figures (2018/2019 FY), to remove the variances associated with Covid lockdowns.

This 22.5% increase in gambling losses, over the last four years, is catastrophic for the Wangaratta community, and the Alliance commends the municipality for commencing this policy work and its associated actions, to minimise harm.

Not only is there obvious financial harm (as well as family, social and psychological harms), these losses represent opportunity costs for the Wangaratta community (for both small businesses and individuals).

## Intersectionality

Gambling has long been known to bring about further health inequality. To understand the impact of gambling across our diverse community, the Alliance supports the further consideration of intersectionality within the policy. For the purposes of this feedback, intersectionality shall refer to the idea that individuals can be marginalised or disadvantaged due to their identity or social characteristics; attitudes of the community, systems or structures<sup>2</sup>. Currently, there are opportunities within the draft to reconsider the impacts of gambling and its associated structures and its impacts on people from marginalised backgrounds, including but not limited to:

- First Nations People
  - 'Existing studies indicate that Aboriginal people experience disproportionate harm from gambling, with greater proportions of Aboriginal people meeting criteria for problem gambling than is evident in population groups<sup>3</sup>.
- Refugee or asylum seeker background
  - 'CALD communities within developed nations—including Australia—tend to participate in gambling less than the overall population, but those who do gamble are more likely to experience problems<sup>4</sup>.
- A persons' mental health
- Language
- Ability
- Geographic location
- Housing Status
- Socioeconomic status<sup>5</sup>

Additionally, when applying an intersectional lens, if many characteristics combine, even without gambling harm:

- there is greater risk of people experiencing family violence
- people find it harder to get the help they need due to systemic barriers (hence, perpetuating their experiences); and
- there is increased risk of social isolation<sup>6</sup>

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<sup>2</sup> Understanding Intersectionality, Victorian Government, 8 Feb, 2021, <https://www.vic.gov.au/understanding-intersectionality>

<sup>3</sup> MacLean, S., Maltzahn, K., Thomas, D., Atkinson, A., and Whiteside, M, 2019, <https://link.springer.com/article/10.1007/s10899-019-09858-9>

<sup>4</sup> AIFS, Gambling in CALD Communities in Australia, 2016, <https://aifs.gov.au/research/research-snapshots/gambling-culturally-and-linguistically-diverse-communities-australia>

<sup>5</sup> <https://www.vic.gov.au/understanding-intersectionality>

<sup>6</sup> <https://www.vic.gov.au/understanding-intersectionality>

When overlaying gambling harm to these dynamics, there is further potential to amplify poor outcomes for people.

Additionally, it is important to acknowledge the temporal relationship that exists between gambling and mental health. *In some cases, the mental health condition could be a risk factor for problem gambling, while in others the gambling behaviour precedes the mental health issue. It could also be the case that comorbid problem gambling and mental health conditions are part of a complex set of relationships that include a third condition (such as trauma or an acquired brain injury)*<sup>7</sup>.

## Responding to the Draft Gambling Policy

### *Positive Considerations within the Draft Policy*

The Alliance for Gambling Reform (hereafter 'The Alliance'):

- Supports that the Responsible Officer for the Policy sits within a Public Health / Community Services setting; consistent with gambling harm being a public health issue.
- Endorses the use of words such as: 'protecting the Wangaratta community from gambling harm', as it acknowledges the need for robust protections to be put in place to minimise harm, as a result of harmful products.
- Commends the proposed endorsement of an associated Action Plan (with the Policy).
- Suggests incorporating best practice principles into the Action Plan, to assist in embedding the policy into the organisation and dually produce targeted and measurable outcomes to minimise harm.
- Acknowledges the Definitions Section of the Policy, which has a clear harm minimisation and public health focus.

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<sup>7</sup> VRGF Submission to Victoria's Royal Commission into Mental Health, July 2019, <https://responsiblegambling.vic.gov.au/resources/publications/submission-to-the-royal-commission-into-victorias-mental-health-system-650/>, p.6

## *Strengthening the Draft Policy through Language*

In terms of orienting dialogue about gambling harm, there are distinctions that can be created through language, as outlined in the [Alliance's language guide](#). Language that is centred on harm; that minimises the gambling industry rhetoric of associating use of products as fun; that centres the responsibility on industry / government / harmful products, instead of people, is best practice.

There are a number of opportunities for the Rural City of Wangaratta to review wording within its Draft Policy and Action Plan. The first example is in the naming of the policy:

**Name of Policy:** Consider changing the name of the policy to: Minimising Gambling Harm Policy or utilising the word 'harm' in the title. The use of the word gambling alone, does not articulate the objectives or commitment of Council to altering the status quo.

Throughout this submission, other opportunities to tighten or strengthen language, will be highlighted.

Firstly, let's consider the Draft Policy.

## *Responding to Statement and Purpose*

From a policy perspective, a local government policy would ideally be aiming to state its own objectives, as an addition to other state or federal regulations. The Alliance therefore, suggests that any background information in relation to local government's statutory responsibilities (sentence 2), be located within a context section (rather than a policy purpose section).

Of the four objectives of the policy, the Alliance suggests altering the wording of three (*continued on next page*):

Objective	Comments	Suggestions
Objective 1: <i>'Protect those most vulnerable to the social and economic harms caused by gambling.'</i>	It can be difficult to specifically determine the actual demographics of those that are most harmed by gambling. Research continues to emerge on this; and as gambling products diversify and specialise, arguably, there are constant attempts to market to a wider range of demographics and broaden the catchment of those who might use harmful gambling products.	It is ideal to broaden the umbrella and consider that all people, depending on their current life circumstances, could be significantly affected by harmful gambling products. As such, the Alliance recommends the wording: <i>Protect people from the social, psychological and economic harms caused by gambling.</i>
Objective 2: <i>Maximise opportunities for gambling activities to deliver social and economic benefits.</i>	<p>The Alliance believes that whilst re-directing some of the revenue for gambling harm, towards community programs and projects, does create some positive outcomes; it does not minimise gambling harm.</p> <p>The Alliance asserts that there is no mutual/collective gain, in offsetting the cost of poor outcomes for one part of the community, with supposed opportunities for another group.</p> <p>Additionally, there are minimal opportunities for local government to determine/control how profits from these venues are spent within the community. [It is noted that there is some funding available (by competitive applications) through the State Government Community Support Fund].</p>	<p>The Alliance recommends that such statements should ideally sit outside of a gambling harm policy.</p> <p>Wangaratta's policy, if it is aiming to be best practice, should focus on harm minimisation.</p>



<p><i>Objective 3: 'Strengthen our partnerships with organisations that provide services to people directly and indirectly affected by gambling-related harm.'</i></p>	<p>It is difficult to ascertain the effectiveness of programs that improve outcomes for people impacted by gambling harm. Due to the stigma and discrimination associated with the use of these harmful products, many people can be reluctant to divulge their experiences (be it the person utilising the product or an impacted family member or support person). General community programs, are not best placed to understand or gauge the effectiveness of such programs/services, given the insidious nature of the impact and harms created. Additionally, many local governments run general community programs; that are not targeted to the distinct needs of someone recovering.</p>	<p>The Alliance recommends removing wording in relation to services that indirectly support those impacted within the draft policy objective; but supports the concept of partnering more strongly with Gateway Health and their programs.</p>
<p><i>Objective 4: Strengthen the community's capacity to understand the risks and impacts of gambling-related harm.</i></p>	<p>The Alliance supports this statement, although the Action Plan would need concise items that aim to achieve this (as, at times, it can be difficult to target appropriate audiences to achieve this outcome).</p>	

## Response to “2. Policy Scope”

There are a number of opportunities within the Scope of the Draft Policy to more strongly articulate what the policy is aiming to address.

In terms of the first few paragraphs:

Paragraph	Comments
Paragraph 1: <i>The Policy outlines Council's position on gambling and will guide Council's roles and responsibilities in relation to all forms of gambling within the Rural City of Wangaratta.'</i>	<p>The Alliance endorses a commitment to minimising and preventing harm for all forms of gambling, but currently there are few references in the policy that relate to all forms of gambling.</p> <p>The Alliance welcomes the opportunity to assist Wangaratta Council with ways they can advocate around all types of gambling (i.e. to include ways to advocate for online gambling reform; or other products).</p>
Paragraph 3: <i>The Victorian Gambling and Casino Control Commission is responsible for the regulation of all forms of gambling, including EGMs. Under the Planning and Environment Act 1987 and the Rural City of Wangaratta Planning Scheme, Council has the capacity to regulate the location and operation of EGMs and consider the social and economic impacts of EGMs. Council can also ensure active participation by the community in planning permit decisions and has the opportunity to represent the community's views on applications for gaming licences under the Gambling Regulation Act 2003.</i>	<p>In relation to paragraph 3, Council has not stated its commitment to minimising the harms, stating that it would: include community views or 'consider' impacts of EGMs. The Alliance supports clearer and more concise wording, to remove ambiguity and misinterpretation of Council's commitments.</p> <p>Council has an obligation to consult with its community, in relation to EGMs, as it would any other policy. As such, the mentioning of active engagement is best placed within a community engagement process, rather than a gambling harm policy; given that Council has an obligation to encourage active engagement across all of its policies and strategies (i.e. this item is no different).</p>

## Considering the Four Pillars:

PILLAR	COUNCIL'S COMMITMENT
1. Manage and support	<ul style="list-style-type: none"> <li>Council will manage gambling activities on Council owned land, build the community's capacity to engage in healthy lifestyles and support the gambling industry to reduce its reliance on revenue derived from gambling.</li> </ul>
2. Partner and advocate	<ul style="list-style-type: none"> <li>Council will advocate on behalf of the Wangaratta community to protect it from gambling-related harm and partner with service providers and agencies to increase access to support for people affected by gambling-related harm.</li> </ul>
3. Plan and regulate	<ul style="list-style-type: none"> <li>Council will fulfill its statutory and land-use planning obligations to regulate gambling activities in the municipality and reduce the incidence of gambling-related harm.</li> </ul>
4. Inform and engage	<ul style="list-style-type: none"> <li>Council will support initiatives that increase the community's awareness of the risks and impacts of gambling-related harm.</li> </ul>

The Alliance is highly supportive of designing the policy in a consistent way (to other Wangaratta policy), and the four categories are ideal in terms of the tiers needed to create change and engage community. There are however ways the Commitments can be re-considered, to ensure that they move beyond business-as-usual, and in to the domain of action, accountability and leadership. The following details the Alliance's suggestions:

- 1. Manage and support:** The Alliance suggests that this proposed item would ideally be edited or removed from a gambling harm policy. This item conflicts with the Policy's stated endeavours of protecting the community from harm. This item appears to be a 'business-as-usual' statement; and proposes to have impact in relation to supporting private businesses to decrease their revenue from, and reliance on, harmful gambling products, something that local government is mostly unable to achieve or enforce. Additionally, the item does not state how it will phase or re-consider its management of gambling activities on Council owned or managed land, over time.
- 2. Partner and advocate:** The Alliance supports protecting people from harm but requests clear statements regarding strategic commitments (including to state and federal governments, and between LGAs), within this section.

In terms of partnerships with service providers, that increase supports for people impacted by gambling harm, this is something that needs careful consideration as to including at all. Individuals can be reluctant, within a general community group, to share the issues fully impacting them, and as such, the achievement of these goals are hard to measure, therefore not fitting within a SMART goal methodology. Many Councils do not have the ability to measure a community's engagement in, or provide referrals to services, that directly support people impacted by harmful gambling products.

- 3. Plan and regulate:** The wording of this Pillar relates to standard items for Council, as such the Alliance recommends removing from the policy. The Alliance endorses the concept of this section being re-oriented to an internal policy and enforcement focus; whereby stronger intra-Council units collaborate to achieve changes in Council signage policies, community facility lease policies and local laws; to truly deliver changes, in terms of how public spaces are utilised. Any actions that eliminate the normalisation of harmful gambling products within community settings, is welcomed.
- 4. Inform and engage:** The Alliance recommends including concise commitments, where there is a clear correlation between the pillar and addressing gambling-related harm. It is difficult to understand the effective strategies or activities that could be implemented to minimise harm, with the current wording. A SMART Goals approach would be ideal.

## *Response to '3. Policy' Section*

The Alliance supports a policy that has clear and measurable parameters and statements (SMART approach), with the following recommendations:

- Avoid information that is commonly known, e.g. it is known that *gambling is a legal form of entertaining*; and *that is associated with some benefits*. The emphasis must focus on the impact, the approach of Council, and removing any language that there is a gain associated with these harmful products.
- Strengthen wording to more clearly articulate Council's commitment to internally and externally to reduce gambling harm.
- Incorporate concise sentences (including editing existing sentences):
  - Council acknowledges that gambling causes significant harm to communities (edited paragraph 1).
  - Council will advocate for halting any increase in EGM quantities across the municipality (edit of paragraph 2).

- Council will be a leader in advocating to Federal and State Government and adjacent local governments, to implement harm reduction approaches, policies and legislation amendments (edit of paragraph 2).
- Council will adopt a public health and whole of community approach, in terms of gambling harm. This includes the application of Council processes and systems that recognise the social, economic and environmental determinants of harm (edit of paragraph 3).
- Council is committed to reframing gambling-related harm in terms of language use; placing the responsibility of harms with the products, the industry and with government (not individuals); and removing any reference to fun and play (edited paragraph 4).
- The Alliance supports paragraph 5, with the following edit: rather than 'Council commits to working with clubs to reduce their dependency on gambling revenue...'; Council will develop systems and processes (with a date) that halt the promotion of gambling products and services offering gambling products, within community services and sports clubs operating on or leasing Council-owned or -managed land (including signage/sponsorship/events funding et al). The Alliance understands the need to maintain lower risk items such as raffles.

### *Comments on '6. Community Consultation'*

The Alliance strongly supports broad community consultation, as highlighted within Section 6 however, this information can be provided within the Council report, that endorses the policy, rather than within the policy itself.

### *Comments on '7. Human Rights'*

The Draft Policy states that Council has considered and complies with the Victorian Charter of Human Rights and Responsibilities 2006. Item 17 of the Charter 'Protection of families and children' states that: *Families are the fundamental group unit of society and are entitled to be protected by society and the State*<sup>8</sup>. *'For every one person with a gambling problem, it is estimated that five to ten other people are affected by it'*<sup>9</sup>.

*At least 184 suicides in Victoria were directly related to gambling and 17 other suicides were by affected others such as family members (between 2009 and 2016)*<sup>10</sup>.

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<sup>8</sup> Charter of Human Rights and Responsibilities Act 2006, p.14

<sup>9</sup> Australian Psychological Society, *Gambling-related harm*, <https://psychology.org.au/community/advocacy-social-issues/gambling-related-harm>

<sup>10</sup> Financial Counselling Australia, 2023, <https://www.financialcounsellingaustralia.org.au/study->

## *Comments on '8. Gender Impact Assessment'*

In order for respondents to the draft policy to fully understand how the Gender Impact Assessment Template (an obligation within the Gender Equality Act 2020 (Vic)) has been considered and applied, the Alliance welcomes the sharing of this information, within the policy. Such an approach assists with transparency and enables stakeholders to understand the nature of this important work, and its relationship to minimising harm.

## Other Opportunities to Strengthen the Draft Policy

### *Council Leadership*

The Alliance recommends wording that demonstrates leadership from a public health perspective:

- Prohibit EGMs and any gambling activities in Council owned and managed facilities.
- Prohibit advertising and signage within Council facilities and reserves, that promotes gambling participation.
- Prohibit the holding of events in Council facilities, that are funded by businesses selling harmful gambling products.
- Ensure wording exists within ethical procurement policies, that prohibit purchasing from suppliers associated with gambling harm.
- And to complement these actions, the implementation of a capacity building program to educate the community on alternative funding streams available.

### *Advocacy*

The Alliance recommends the application of SMART goals (or similar) within the policy, in terms of the advocacy and partnerships it is aiming to create or deliver.

At a minimum, the names of networks/ agencies/ bodies/ government/s that Wangaratta Council plans to advocate with or to; to ensure that resources and strategic commitments/partnerships are applied/activated. This ensures that Councillors and Council Officers understand the breadth of the advocacy work that is supported by Council. An additional way of advocating in a broader way, for change, is through membership with the Alliance for Gambling Reform.

## *Implementation*

The Alliance endorses the creation of systems that embed this policy work, including (but not limited to):

- Determining inter-Council Service Unit responsibilities that will need to exist (or that will need strengthening) to deliver on goals (particularly between Statutory Planning, Enforcement/Local Laws, Sport and Recreation and Social Policy/Community Development); including an accountability/governance framework. This may require the implementation of a gambling harm working group to steer the work.
- We also urge an inclusion in the policy (or a commitment to development work) that empowers officers to enforce the policy and explains what enforcement action will be taken.
- It is recommended that the Action Plan is endorsed with an associated budget, to assist with implementation, and to demonstrate Council's commitment to this important work.

## *Policy Review & Duration*

Given Council's understanding of this complex and harmful issue within the Wangaratta community, the Alliance recommends endorsing this policy, with a date (i.e. 2023 to 2026; preferable three years), as a foundation for Council to build on this important work, given the constant change to technology and systems and resulting harms that occur, within this sector. This provides the opportunity for accountability and to build on the momentum gained through the life of this policy.

The second component of this submission is the response to the Draft Gambling Action Plan, as well as considering the option to be part of a formal channel/organisation that leads gambling reform.



## Response to Gambling Action Plan

### *General Comments*

The Alliance wholeheartedly welcomes the endorsement of an Action Plan with the Gambling Policy.

### *Strengthening the Draft Gambling Action Plan*

Similar to the suggestion for the Draft Policy, the Alliance believes the Action Plan can be strengthened by the utilisation of the word 'harm' or 'harm minimisation' within its title.

**Location of Information:** The Alliance recommends considering where information is located, between the policy and action plan. Ideally pages 3 to 6 (the information that details the policy context and current Wangaratta circumstances) would be included within the Policy document.

**Action Plan Scope:** refer previous comments (included above, in Policy response) regarding possible amendments to the Policy Scope.

### *Opportunities to Improve the 'Strategies and Actions' Section (of Action Plan)*

There are ways that the Action Plan can be strengthened, to assist in achieving the goal of minimising gambling harm.

[Please also refer to comments on the Scope and Four Pillars above].

## Comments on 'Strategy 1. Manage and Support'

Action Item	Comment
1.1 Continue to promote a variety of non-gambling events, activities and programs that encourage residents to lead active and healthy lives.	Generally speaking, actions that aim to enhance healthy lifestyles are important, in terms of local government and their priorities. In the context of gambling harm, it can, however, be difficult to measure the effectiveness of this proposed action. This item would ideally be located within a Municipal Public Health Plan, where generally healthy lives is the focus. Ideally, a Gambling Harm Action Plan has the specific opportunity to focus on items that have measurable or direct outcomes.
1.2 Actively promote the conduct of Rural City of Wangaratta activities, social outings, meetings or municipal events at venues that don't provide any form of gambling except for commemorative events such as ANZAC Day, Vietnam Veteran's Day, and Remembrance Day commemorations, fundraising events that support disadvantaged groups in the community, and events that provide recognition for volunteers.	This item is ideally located within a community events policy. Ideally, this plan, can focus on purposeful, proactive and measurable outcomes, to reduce gambling harm.
1.3 Maintain independence from the gambling industry by: <ul style="list-style-type: none"> <li>• prohibiting advertising and/or the promotion of gambling of any form at Council owned or managed facilities;</li> <li>• prohibiting any form of gambling, including online gambling, on Council owned and managed land</li> </ul>	The Alliance strongly supports this Action Plan Item, with the following suggestions: <ul style="list-style-type: none"> <li>○ Include a further breakdown of (a) the timing for prohibiting advertising on Council owned or managed facilities; and (b) the process, i.e. development of a working group to implement/manage actions.</li> <li>○ Consider including: 'Develop a policy (or addendum to existing policy) in relation to prohibiting the hiring of Council facilities, to organisations that sell harmful gambling products.' Include the timelines for endorsement.</li> </ul>

<ul style="list-style-type: none"> <li>• <i>discouraging the procurement of products and services from entities which derive revenue from gambling activities</i></li> <li>• <i>minimising financial support or provision of grants for activities that take place in gambling venues</i></li> <li>• <i>not accepting any new financial or in-kind contributions from the gambling industry</i></li> </ul>	<ul style="list-style-type: none"> <li>○ Consider including: 'Prohibit the holding of events in Council facilities, that are funded by businesses selling harmful gambling products.' Additionally, include information about the implementation of this new approach (including working group creation, timeline for achieving, and possible creation of regional or local services list, to assist Council officers in knowing providers/businesses).</li> <li>○ Consider editing wording (dot point 3 above): Replace 'Discourage' with 'Prohibit'. Additionally, include details around a process for achieving this, with timelines.</li> <li>○ Dot point 4 (above): replace 'Minimise' with 'Prohibit'. Include information about process for implementation of this.</li> <li>○ Review Council's Social / Ethical Procurement Policy and Procedure, to prohibit purchasing from companies that sell or are associated with gambling harm.</li> </ul> <p>Given the volume of changes that this may represent for Wangaratta, it might be preferred to establish one Gambling Harm Working Group, to steer all of these improvements.</p>
<p><i>1.4 Work with community groups and organisations to reduce their financial dependence on revenue derived from gambling sponsorships and gambling activities.</i></p>	<p>The Alliance endorses the implementation of a capacity building program to educate the community on alternative funding streams available.</p>
<p><i>1.5 Seek external funding opportunities that will contribute towards protecting the Rural City of Wangaratta community from gambling-related harm.</i></p>	<p>The Alliance supports external funding submissions to contribute to capacity building of its staff, contractors, Councillors, and partners. Funding that establishes programs for people that could potentially have been harmed by gambling, is sometimes not as effective as programs (State-funded or NGO-run) that specifically</p>

	<p>tailor to and meet the needs of those affected by gambling.</p> <p>Best Practice Harm Reduction Policies and approaches point to the systems and structures that propel gambling harm, rather than it being something that an individual needs to fix within themselves, and additionally, it is difficult to ascertain the effectiveness of such measures.</p> <ul style="list-style-type: none"><li>○ <i>These activities are often delivered as part of council health and wellbeing plans, but are very difficult to target to people experiencing gambling harm. Leave them in your health plan, don't make them a major part of your gambling policy and action plan unless the strategies are specific to gamblers or gambling venues<sup>11</sup>.</i></li></ul>
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<sup>11</sup> The Role of Local Government Policy, Victorian Local Governance Association, [f3b93a\\_fe28b0b836504468a33feb8beaffb19a.pdf \(agr.org.au\)](https://agr.org.au/f3b93a_fe28b0b836504468a33feb8beaffb19a.pdf)

## Comments on 'Strategy 2. Partner and Advocate'

The Alliance commends Wangaratta Council for acknowledging the significance of partnership and advocacy in minimising and addressing the harm created by gambling products. Given that three tiers of government are responsible for the policy and legislation in relation to gambling products, advocacy and partnership is a key method for instigating change. In order to fully realise some of the intentions of the Rural City of Wangaratta's Draft Policy and Action Plan, the Alliance recommends the following for Section 2 (Action Plan):

NB: the application of SMART goals ensures that Council officers and Councillors know their parameters from an advocacy and partnership perspective. This can be applied in Actions 2.1 to 2.4.

Action Item	Comment
2.1 <i>Support advocacy work targeted towards implementation of stronger and more effective harm minimisation measures.</i>	Consider re-wording: Support harm minimisation advocacy (by Councillors and Council Staff) to federal and state government, including (but not limited to): submissions to VGCCC; opportunities to provide feedback in relation to legislation and policy changes (State and Federal).
2.2 <i>Collaborate with, and contribute to, other local government organisations, local government peak bodies and gambling networks to advocate for reform and develop state-wide advocacy strategies.</i>	The Alliance supports wording that provides clear parameters. This could include supporting the work of neighbouring councils, to enhance combined regional approaches, in reducing harm. Additionally, it is important to name the networks that Wangaratta is committed to attending. This allows the assignment of resources/staffing to attend and enact outcomes from these forums.
2.3 <i>Advocate for a greater share of the State Government Community Support Fund to be directed to initiatives that build the Wangaratta</i>	The Alliance supports any local government's attempts to access funding that enhances the health and amenity of a municipality. It is the Alliance's preference that these items are included within other Strategic Funding Strategy/Approach, rather than the Gambling Harm

<i>community's capacity to engage in healthy lifestyles and protect the Wangaratta community from gambling-related harm.</i>	Policy/Action Plan. In and of, themselves, this funding does not minimise harm.
2.4 Advocate for changes to the Community Benefit Statement that require the gambling industry to commit funds to addressing gambling-related harms in the community.	<p>The Alliance supports the Rural City of Wangaratta's advocacy commitment in relation the Community Benefit Scheme (CBS). A SMART goal approach can be adopted within this item.</p> <p>Ideally, this would include references to abolishing Class B and C. Class B of the CBS can include the running costs of the venue; and Class C can be applied to activities considered community benefits<sup>12</sup>. The significance of this, is that operators can provide items to clubs or community groups that promote their venue, that are held in their venue or that cover a venues operating costs. This therefore is a vehicle for a venue's increased revenue, and which further normalises gambling to the community group that the CBS attempts to benefit.</p> <p>Class A is the only category of the CBS that resembles an actual community contribution. However, this item is still problematic as there is no stipulation that this contribution is cash. The Alliance supports cash only contributions for Class A and the removal of Class B and C.</p> <p>Further, the Alliance asserts that venues and recipients should not be able to promote their Community Benefit contributions. Drawing attention to this scheme, arguably highlights that there is a potential net community gain as a result of these harmful products.</p>

<sup>12</sup> Community Benefit Statements FAQs, VGCCC, [faq\\_community\\_benefit\\_statements.pdf](https://vgccc.vic.gov.au/faq_community_benefit_statements.pdf) (vgccc.vic.gov.au)

## Comments on 'Strategy 3. Plan and Regulate'

The Alliance endorses Wangaratta Council's commitment to regulating and embedding harm minimisation strategies within Section 3.

There are three opportunities to strengthen the wording in this section:

Action Item	Comment
<i>3.2 Oppose a proposal for a new gaming operator or increase in the number of EGMs in an existing venue if a rigorous social and economic impact assessments indicates it will have negative social and economic impacts on, and minimal community benefit for, the community of the Rural City of Wangaratta.</i>	It is recommended that there is wording included that resources will be utilised to engage an external social or economic impact assessment agency to complete a social and economic impact assessment. This ensures that Council has engaged in due process to determine its position.
<i>3.3 Implement effective leasing arrangements to prohibit gambling activities and advertising on Council owned or managed land.</i>	In addition to prohibiting gambling activities and advertising on Council owned or managed land, Council could also include: <ul style="list-style-type: none"> <li>○ a commitment that tenants are prohibited from using a Council venue for an event that is subsidised or sponsored by a business that sells harmful gambling products.</li> </ul>
<i>3.4 Discourage new gaming operators and/or additional EGMs in communities vulnerable to gambling-related harm and in communities with limited access to non-gambling activities.</i>	<ul style="list-style-type: none"> <li>○ Replace the word 'discourage' with 'advocate to prohibit'.</li> <li>○ The Alliance recommends removing 'vulnerable to gambling-related harm and in communities with limited access to non-gambling activities'. From a harm minimisation perspective, it is important to note that all communities (directly and indirectly) are negatively impacted by harmful gambling products. Additionally, it is mostly impossible to decipher who might be susceptible to harm, depending on people's life experiences, anyone can be vulnerable to these harmful products.</li> </ul>



	Many people with lived experience of gambling harm state their sentiments of never thinking it was something they would ever be drawn in to.
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### *Comments on 'Strategy 4. Inform and Engage'*

The Alliance supports Wangaratta Council's commitments within Section 4. For strengthening purposes, the following is recommended:

<b>Action Item</b>	<b>Comment</b>
4.1 <i>Respond to and support gambling-related research, data collection or government enquiries.</i>	Utilising a SMART goal approach, this item could ideally be adjusted to incorporate the approach to be adopted, with possible options: <ul style="list-style-type: none"> <li>○ Communicate within Council and to relevant external stakeholders about gambling harm research, data or government enquiries.</li> <li>○ Prepare Councillor briefing document of research findings.</li> <li>○ Prepare formal Council responses to government in relation harmful research findings.</li> </ul>
4.3 <i>Work with and support current EGM venues, relevant organisations, providers, agencies and initiatives to educate the Rural City of Wangaratta community on the overall negative public health impact of gambling and the risks involved with all forms of gambling.</i>	Whilst the Alliance welcomes any strategies by EGM venues to educate the community in relation to gambling harms, this Action Plan would ideally focus on specific, measurable and achievable goals, and as such, it is recommended removing this part of the wording.

In finalising its submission, the Alliance would like to detail opportunities to achieve best practice in terms of minimising gambling harm and the possibility of emerging as a leader within gambling reform.

## Membership with Alliance for Gambling Reform

Gambling is a complex and ever-changing area and council officers often have several portfolios. The Alliance for Gambling Reform (AGR) is the peak agency that supports local governments in minimising gambling harm. Currently, there are 23 [Leadership Councils](#) that support AGR in its work.

To support councils developing a strong approach to harm prevention we offer;

- Learning and development opportunities for officers and councillors to develop knowledge of gambling regulations, research, statistics and best practices for preventing harm
- Support to develop submissions to inquiries such as royal commissions, Public Accounts and Estimates Committee and other government consultations
- Assistance to develop or revise council gambling harm prevention policies, and consideration of planning scheme amendments
- Access to Alliance policies developed using latest research, and informed by our Voices of lived experience
- The Alliance for Gambling Reform's Supporter Manager, Rebecca Paterson, welcomes conversations with relevant stakeholders (Councillors or Council Staff) in relation to membership.

## Current Best Practice Directions

To assist RCOW in understanding the strategic activities that are occurring to reduce gambling harm, the following projects / policies and activities are underway or ongoing (by the Alliance for Gambling Reform and its partner organisations; and other peak harm reduction agencies):

- Advocating for the Victorian Government to amend the Gambling Regulation Act 2003 (Vic)<sup>13</sup>, to more greatly require decision-makers to consider the social and economic impacts and the increasing densities of EGMs on vulnerable communities; to prohibit new or increased EGM applications; and to enhance the responsibilities in relation to Community Benefit<sup>14</sup>.
- Advocating for the prohibition of television gambling advertising (or, at a minimum, tightening of the hours and platforms this is an option).

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<sup>13</sup> *Gambling*, Municipal Association of Victoria, [Gambling | MAV website](#)

<sup>14</sup> *Gambling Regulation Act 2003*, MAV, [Gambling Regulation Act 2003 | MAV website](#)

- Continual advocacy in relation to decreased EGM venue opening hours; and mandatory pre-commitment regulations and their associated functionality (cut-off timeframes, amounts et al).
- Online gambling reform, particularly focusing on access by young people (at times, the vehicle/segue being gaming).
- Increased transparency and timeliness in relation to donations to political parties from the gambling industry.
- Advocating against facial recognition technology in venues (industry-promoted as being a vehicle to minimise harm, but has the greater risk of being used to directly target consumers for marketing to increase harm).
- Increasing opportunities for Voices for Gambling Reform, people with lived experience, to be connected to and integral to reform and policy agenda.
- Case-by-case advocacy for new EGM applications or increased EGM volume within existing venues.
- Advocating for tightened protections within self and third-party venue exclusion systems.

## *Best Practice Policy Examples*

It is important to highlight the work of other local government areas in Victoria whose work represents Best Practice, in minimising harm, these are:

- Hobsons Bay City Council – Gambling Harm Prevention Policy Statement 2023
- Monash City Council – Public Health Approach to Gambling Harm Policy 2022
- Darebin City Council – Electronic Gaming Machine Policy 2018-2022

Finally, the Alliance urges Wangaratta Council to include in your policy a commitment to provide professional development for council staff that develops an understanding of gambling harm and its impacts (for the social policy team, but also more widely including sport and recreation, positive ageing, youth and families).

Thank you for the opportunity to provide a submission and please don't hesitate to contact us if you have any questions or wish to discuss.



**ALLIANCE FOR  
GAMBLING REFORM**

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# Survey Responses

08 November 2023 - 28 January 2024

## Draft Gambling Policy and Action Plan

# Connect Wangaratta

Project: Draft Gambling Policy & Action Plan



VISITORS					
46					
CONTRIBUTORS			RESPONSES		
12			12		
7	0	5	7	0	5
Registered	Unverified	Anonymous	Registered	Unverified	Anonymous



**Respondent No:** 1

**Login:** Registered

**Responded At:** Nov 27, 2023 12:17:43 pm

**Last Seen:** Nov 27, 2023 01:15:08 am

Q1. **Finish this sentence**Gambling in the community is... Excessive

---

Q2. **Do you support the draft Gambling Policy and Action Plan** Yes, I support it

---

Q3. **Please tell us why you chose the above answer**

Because gambling is huge in the rural city of wangaratta. Excessive spending on pokies and TAB. and some spend way too long there.

---

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

No

---



**Respondent No:** 2

**Login:** Registered

**Responded At:** Nov 27, 2023 12:21:06 pm

**Last Seen:** Nov 27, 2023 01:19:17 am

Q1. **Finish this sentence**Gambling in the community is...

Bad and harmful to members of the community. People with bad gambling addictions sometimes are unable to purchase the essentials they need and need to seek help from local charity services

Q2. **Do you support the draft Gambling Policy and Action Plan**

Yes, I support it

Q3. **Please tell us why you chose the above answer**

Venues need to be responsible and stop letting the same people gamble hundreds of dollars a day at their venues and need to practice RESPONSIBLE gambling

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

not answered





**Respondent No:** 3

**Login:** Registered

**Responded At:** Nov 27, 2023 12:43:56 pm

**Last Seen:** Dec 12, 2023 23:47:39 pm

Q1. **Finish this sentence**Gambling in the community is... a disease

---

Q2. **Do you support the draft Gambling Policy and Action Plan** No, I do not

---

Q3. **Please tell us why you chose the above answer**

It does almost nothing to prevent future pokies growth.

---

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

Very disappointing it took six years to draft and then we gave citizens 4 weeks to respond. If Council is going to adopt this policy, they should admit that they are not serious about achieving the strategic goal of reducing gambling amongst the community.

---



**Respondent No:** 4

**Login:** Registered

**Responded At:** Nov 27, 2023 15:23:15 pm

**Last Seen:** Nov 27, 2023 04:16:56 am

Q1. **Finish this sentence**Gambling in the community      destroying lives  
is...

---

Q2. **Do you support the draft Gambling Policy and**      I support it somewhat  
**Action Plan**

---

Q3. **Please tell us why you chose the above answer**

The policy needs to be stronger, to limit gaming machines to existing numbers.

---

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

The Council should be firmer with this, to protect vulnerable citizens. Community welfare must come before profit-making with the capacity to cause harm. Whole families suffer from a problem gambler.

---



**Respondent No:** 5

**Login:** Registered

**Responded At:** Nov 28, 2023 12:14:23 pm

**Last Seen:** Nov 28, 2023 01:08:28 am

**Q1. Finish this sentence**Gambling in the community is...

To some extent a practice we're all familiar with, but also something that needs strict & well managed guidelines, enforcement & practice to ensure the safety of the wider community

**Q2. Do you support the draft Gambling Policy and Action Plan**

Yes, I support it

**Q3. Please tell us why you chose the above answer**

I think the action plan and policy is a good step in terms of working towards some important regulation of gambling. I share a very strong concern about the capacity of gambling to have a very adverse impact on, not just those who struggle with it, but the wider community as well. I have unfortunately been faced in my community experience with a lot of people who suffer long-term consequences because of what is deemed largely to be a non-dangerous activity. It does require very clear guidelines, practices and enforcement for the future.

**Q4. Is there anything else you'd like to share about the draft gambling policy and action plan?**

From what I understand of the very lengthy report commissioned, I support it in broad terms, but the depth of it also meant that some of the recommendations and conclusions are ambiguous in how they will affect future action. Is it possible to commission or provide a far more brief overview of this important subject?



**Respondent No:** 6

**Login:** Registered

**Responded At:** Dec 13, 2023 16:59:58 pm

**Last Seen:** Dec 13, 2023 05:52:54 am

Q1. **Finish this sentence**Gambling in the community is...

Destructive and toxic both to the gambler and to their family as well as the community.

Q2. **Do you support the draft Gambling Policy and Action Plan**

Yes, I support it

Q3. **Please tell us why you chose the above answer**

Yes I support any attempt to minimise harm from gambling. I just don't think the action plan goes far enough.

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

Wangaratta has a gambling problem which is out of control, losses on poker machines are among the highest in the state. Council needs to act to protect the community from the damages wrought by gambling and reducing accessibility hours, introducing limits on losses per individual and freezing numbers of machines are two things that can happen now.



**Respondent No:** 7

**Login:** Registered

**Responded At:** Jan 02, 2024 14:14:56 pm

**Last Seen:** Jan 23, 2024 02:45:06 am

Q1. **Finish this sentence**Gambling in the community is... A huge problem impacting on children and families.

---

Q2. **Do you support the draft Gambling Policy and Action Plan** I support it somewhat

---

Q3. **Please tell us why you chose the above answer**

It needs more detail and a stronger message and structural approach to give council the ability to successfully challenge new applications to install more pocker machines in clubs.

---

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

Council should strengthen its planning scheme and gaming containment policy in order to protect the community. Council should join with the VLGA and its association with the Alliance for Gambling Reform to strengthen its policies and strategies. These organisation and the work they have already undertaken provide strong support in case of future applications to increase the communities exposure to gambling venues.

---



**Respondent No:** 8

**Login:** Anonymous

**Responded At:** Jan 08, 2024 16:02:19 pm

**Last Seen:** Jan 08, 2024 16:02:19 pm

**Q1. Finish this sentence**Gambling in the community is...

Currently on a scale that is very damaging. It is syphoning off enormous sums of money out of Wangaratta and impoverishing already impoverished families

**Q2. Do you support the draft Gambling Policy and Action Plan**

No, I do not

**Q3. Please tell us why you chose the above answer**

I want stronger action to curb the upsurge of gambling in Wangaratta.

**Q4. Is there anything else you'd like to share about the draft gambling policy and action plan?**

I would like to see a permanent cap on the number of poker machines in the RCOW. Draw a line in the sand in 2024. I don't want even one machine more. If implementing this requires an alteration in The Wangaratta Planning Scheme I ask the the staff at the RCOW council organise the necessary amendment



**Respondent No:** 9

**Login:** Anonymous

**Responded At:** Jan 15, 2024 09:47:34 am

**Last Seen:** Jan 15, 2024 09:47:34 am

Q1. **Finish this sentence**Gambling in the community is... a blight

Q2. **Do you support the draft Gambling Policy and Action Plan** Yes, I support it

Q3. **Please tell us why you chose the above answer**

Gambling especially poker machines have taken a lot of the vibe out of the community and the only real winners are the organisations that own them. There are massive profits in them at a great cost to the community. Any venue that has them should have higher taxes and rates that are directed back in to the community. Pokies are a very addictive form of gambling. When they were introduced into Victoria they should have been at club level and not into pubs. I personally would take a leaf out of the indigo shires book and don't have them at all.

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

It's out of control and aimed at the youth especially with the online platforms. Although gambling dens are now part of the community it is important to support non gambling venues and organisations One of my old employers once said to me while ever they are sitting playing these machines we don't have to worry about selling food and drinks they had 80 machines in Wodonga. We called the pokie area the room of doom



**Respondent No:** 10

**Login:** Anonymous

**Responded At:** Jan 15, 2024 16:40:46 pm

**Last Seen:** Jan 15, 2024 16:40:46 pm

Q1. **Finish this sentence**Gambling in the community  
is...

A problem that needs to be stopper

Q2. **Do you support the draft Gambling Policy and  
Action Plan**

I support it somewhat

Q3. **Please tell us why you chose the above answer**

It doesn't go far enough

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

not answered





**Respondent No:** 11

**Login:** Anonymous

**Responded At:** Jan 26, 2024 11:32:17 am

**Last Seen:** Jan 26, 2024 11:32:17 am

**Q1. Finish this sentence**Gambling in the community is... a scourge.

**Q2. Do you support the draft Gambling Policy and Action Plan** No, I do not

**Q3. Please tell us why you chose the above answer**

The proposed plan is weak, and supports the gambling industry at the expense of the health and wellbeing of the broader community. If the Council accepts the Draft Plan they are basically giving the green light to continue and expand gambling in the RCoW. Working with agencies to ameliorate problems is akin to shutting the stable door after the horse has bolted. The repeated mentions of online gambling are a "get out" card in the policy. A focus on online gambling directs attention, energy and resources away from pokies - an area in which our Council can have some influence through appropriate planning and policy tools.

**Q4. Is there anything else you'd like to share about the draft gambling policy and action plan?**

Council voted to support the Wangaratta RSL to double the number of EGMs on 22nd August 2017. This was despite community opposition and losses in excess of \$22,000 per day to pokies in the RCoW. In a 2 step process the Council did not support the RSL application to the Victorian Commission for Gambling and Liquor Regulation, but did vote to approve a multifaceted permit which allowed the installation of 50 EGM's at The Sydney Hotel. Council planners stated repeatedly that their hands were tied as there was no gambling policy on which to base decisions. This proposed draft policy does not strengthen planning tools and will not allow Council to reject applications related to more pokies, therefore it does not fill the planning void, but holds opens the door to accepting pokies in our community. The powerful gambling industry does not need Councils lobbying on their behalf, but the community needs Council on their side.



**Respondent No:** 12

**Login:** Anonymous

**Responded At:** Jan 28, 2024 13:05:46 pm

**Last Seen:** Jan 28, 2024 13:05:46 pm

Q1. **Finish this sentence**Gambling in the community is... an embarrassment

---

Q2. **Do you support the draft Gambling Policy and Action Plan** No, I do not

---

Q3. **Please tell us why you chose the above answer**

The draft policies are toothless

---

Q4. **Is there anything else you'd like to share about the draft gambling policy and action plan?**

It is difficult to assess how Wangaratta Council is really supporting the community. Two draft policy statements in particular are quite concerning and puzzling : "Maximise opportunities for gambling activities to deliver social and economic benefits."  
"Support the gambling industry to reduce its reliance on revenue derived from gambling."

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Ref	Mode	Date	Name
1	Email	8/11/2023	Submission 1

Upon reading the draft gambling policy I suggest an amendment to page 3, 3. Policy It is suggested that 'gaming venues' should be replaced by 'EGM operators'. I suggest that 'gaming venues' be replaced with 'gambling venues'. This makes it clear as to what the venue does given that many people would not know what an 'EGM Operator' was.

It concerns me that only 8.33% of gambling losses are returned to the community (and not necessarily the community which made the loss), serious thought should be given to at least keep the numbers of EGM's stable and not increased, with the consideration of reducing the number of EGM's in the future. We are a small community that cannot afford to lose more than \$10 million per annum. Given that we are unlikely to see 8.33% of that put back into our community, it seems that the people who actually lose the money on EGM machines, will never see a benefit.

Council acknowledges in its Draft Policy the risk and misery that gambling can bring to not only the gamblers, but also to their families and community.

Thank you

Ref	Mode	Date	Name
2	Letter	13/11/2023	Submission 2
	Connect	27/11/2023	

Gambling Policy  
Submission on Council's proposed gambling policy

The Council Draft Policy mentioned reducing gambling, but in fact gives no impediment to more gaming machine applications. This will not be effective or result in any change whatsoever.

The wording of the draft policy should be strengthened and the Planning Scheme needs to be modified to oppose all new gaming machine applications in the community. This would go some way in preventing problems proved to be directly caused by gambling addition, such as domestic violence, marriage breakups and financial ruin for not just the gambler, but whole families.

I would encourage Council to join the Alliance For Gambling Reform, a body to which more than 20 local Councils belong. The Councils in the Alliance have shown good success in limiting the harm from gaming machines.

I have observed the effects of gambling addiction on a family known to me, in another municipality.  
[redacted for confidentiality] The effect on all her family, friends and colleagues was devastating.

Ref	Mode	Date	Name
3	Email	20/11/2023	Submission 3

Submission to Wangaratta Councils Draft Gambling and Gambling Action Plan.

My submission is mostly pertained to EGMs.

I think council should do all it can to make the industry of EGMs as hard as possible within the law. The evidence is clear that EGMs do harm to our society, the idea that clubs / pubs with EGMs provide community benefits via monies is false, the harm far out ways any good.

The idea of people have a right to do as they wish and we should not take action is an affront to sensible policy. Governments have regulated to the benefit of communities for a long time when clear harm is evident. Be it public health IE: smoking, workplace OHS protocols or in public safety like evacuation plans in venues etc.

EMGs policies of council to consider. Most of the policy suggestions come from other councils in Victoria. IE: Darebin

- 1) Council to support measures to prevent and/or respond to gambling harm that are evidence-based and likely to have a positive impact.
- 2) Council will oppose any planning and licensing application for additional EGMs and the transfer of EGMs in the municipality where there is evidence that the application will have negative social and economic impacts and minimal community benefit.
- 3) Council will acknowledge and honour any existing arrangements between sporting clubs, community groups, organisations, associations or Council programs and EGM operators, owners and venues until a mutually suitable and tailored transition plan has been finalised.
- 4) Councillors, Council staff will not run Council and community events, activities, programs and social outings in venues that have EGMs. Or attend any such event at such venue and represent the council.
- 5) Council will support any club / venue that wishes to divest themselves of EGMs to develop a transition plan in order that they may continue to access Council facilities and resources and provide a community benefit to their members.
- 6) Council will not provide sporting grounds, Council venues or use of Council property to any sporting clubs, community groups, organisations or associations who directly operate or own EGMs in Wangaratta or elsewhere.
- 7) Through its Leasing and Licensing Policy, Council will not permit gambling promotion or advertising in Council-owned facilities. This pertains to sports betting, online gambling and EGMs.
- 8) Any sporting club, community group, organisation or association that operate or own EGMs will be ineligible for community grants, financial assistance or in kind support from Council.

9) Any sporting club, community group, organisation or association that receives sponsorship or grants (in-kind or cash) from poker machine revenue will have Council grants, in-kind support and funding reduced by the amount and level of funding and/or in-kind support received from EGM sources.

10) Council will not fund community groups who meet in venues that have EGMs through any of its community funding programs.

11) Council will not provide community grants, funding, sponsorship, Council facilities, publicity or promotion for community groups/organisations that promote gambling.

12) Council will not permit community groups or sporting clubs to advertise or promote gambling related activity at local venues or via online gambling agencies.

13) Any sporting club, community group, organisation, association or business that operate or own EGMs, or receives sponsorship or grants (in-kind or cash) from poker machine revenue will be ineligible for community grants, financial assistance or in-kind support from Council.

14) Community groups, clubs, organisations, associations and businesses that are in a council owned facility or building (in a capacity of a license or lease agreement) or plan to hire a council facility or building are prohibited from receiving sponsorship or grants (in-kind or cash) from poker machine operators.

#### REASONABLE POLICY EXCEPTIONS

Music groups and musicians who perform in EGM venues.

Live music groups and musicians, and associated performers that perform in EGM venues and are not in direct receipt of Council funding but may be contracted by Council to perform at an event or associated Council sponsored program, are considered outside the scope of the Policy and will not be affected.

ANZAC Day and similar military services held at The Returned and Services League (RSL) The RSLs will be exempt from the EGM Policy only for ANZAC day and similar military service events. For these occasions the Council resources such as access to the community bus will continue for eligible residents wishing to attend these commemorative events.

Ref	Mode	Date	Name
4	Email	21/11/2023	Submission 4
	Connect	27/11/2023	

Dear Council,

this email and attached presentation is my submission on the Gambling Policy.

As a concerned citizen, avid poker player, and former poker/gambling journalist, I have witnessed firsthand the destruction that EGM gambling ("pokies") causes in communities worldwide, wherever they are introduced. EGMs are remarkably more addictive, more dangerous, and more deliberately misleading than any other form of locally legal gambling. There is a mountain of scientific research to back this up.

Council adopted the 2021-25 strategic goal to "reduce rates of gambling amongst the community." A goal that I wholeheartedly support.

Of the three sub-goals of this, the drafting of a Gambling Policy is an important step. Council Gambling Policies and Planning Schemes are (by far) the most cited documents in VCAT and VGCCC hearings regarding EGM expansion.

Unfortunately, the draft policy as it stands cannot and will not achieve Council's strategic goal. It describes what Council has effectively been doing relating to gambling policy over the past several administrations. As 2023 will be the worst year for EGM losses in Wangaratta's history, we can be fairly sure that doing the same thing will achieve the same results.

We only need to look at other Councils in VIC and NSW to see that while 2023 will be the worst year in Wangaratta history for EGM losses, things can and will still get much worse for our residents if EGM gambling is allowed to expand here.

In light of the gap I see between this policy and the stated strategic goal, the minimal advertising that Council has done to garner feedback on the policy, and the very brief 28-day consultation period for a policy that took over six years to draft, I am requesting:

- to be heard by a Committee of Council in support of my submission prior to November 30.
- that Council defers the adoption or re-drafting of this policy until wide, survey-level input is gathered from residents and community organisations regarding gambling harm.
- that Council commissions an independent study from an Australian university gambling harm research group or the Alliance for Gambling Reform to quantify the effects of gambling harm on the Wangaratta community.
- that a new consultation period of a minimum of 6 months be allowed before a re-drafting of this policy.
- that the policy and call for community feedback is prominently advertised in the Wangaratta Chronicle, on Wangaratta radio, and on the Wangaratta Community Facebook page over a six-month period.
- that Council meet with gambling policy leads at the Alliance on Gambling Reform, Victorian Responsible Gambling Foundation, the Victorian Local Governance Association, and the 23 Councils



listed in my presentation, to consult on best practices relating to drafting a Gambling Policy and modifying Planning Schemes to contain growth in community EGM losses.

- that Council publishes the full un-redacted report of the community feedback that was gathered from health providers and community groups in support of this draft.
- that if Council outsources the re-drafting of this Policy, it engages with a consultant recommended by the Alliance for Gambling Reform.

Ref	Mode	Date	Name
5	Email	27/11/2023	Submission 5

Dear Councillors,

I am writing to urge you to do more to contain the growth of the number of poker machines in Wangaratta when you revise the Draft Gambling Policy.

At a time when cost of living pressures are intense, Council should be seeking to reduce the opportunity for harmful gambling practices.

Will Council be implementing bet/loss limits or restricting new approvals to help to control the damages caused by gambling?

Ref	Mode	Date	Name
6	Email	27/11/2023	Submission 6
	Connect	13/12/2023	

I am a resident and ratepayer of Wangaratta with deep concerns about the extent of the gambling problems we have here. Attached are my suggestions.

#### Feedback on the RCoW Draft Gambling Action Plan

Firstly, congratulations on RCoW for considering the need for an action plan for minimising damage caused by Electronic Gaming Machines. However, the Action Plan does not include much in the way of definitive or measurable action and includes a bit too much 'aspirational' language instead of firm statements.

I would like to highlight some information in the Draft.

Firstly the amount of money lost to poker machine gambling alone in the Wangaratta is shocking by anyone's measure.

To quote the statistics provided on page 5, we have four venues with EGMs who take a total of \$10,874,191 from the pockets of gamblers, most of which are the low income members of our total adult population of 23,618, (i.e.. those least able to afford it are gambling the most). This does not fully describe the extent of the problem. We do not all gamble on poker machines so the figure of \$460 per adult losses does not accurately report the extent of the problem, which page 6 describes as worsening.

Wangaratta has 154 EGMs, and our municipal cap is 223. We have amongst Victoria's highest density per 1000 adults.

RCoW needs to commit to not supporting any increase in the number of EGMs allowed as a priority.

Page 7:

Under the general heading of Manage and Support, I'm wondering why the document would say 'support the gambling industry'. Surely this should read 'support the community? Unless it means supporting the gambling industry to explore different forms of profit generation that aren't predicated on human misery?

1.3 (page 8) needs to be extended to say 'prohibiting advertising/gambling promotion of gambling by any club or group that receives council funding or uses council owned or managed facilities'.

Instead of 'discouraging the procurement of products and services from entities which derive revenue from gambling activities' I suggest that in place of 'discouraging' the word 'prohibiting' is used.

Likewise with 'minimising financial support or provision of grants for activities that may take place in gambling venues' replace 'minimising' with 'prohibiting'.

Finally in this section, if council currently accepts any contributions from the gambling industry, either financial or in-kind it should commit to stopping that practice entirely.

#### 1.4 (page 8)

The action plan needs to include more detail about how many groups are currently financially dependent on revenue from gambling sponsorships and gambling revenue, if RCoW is currently working with all said groups or just some, and how RCoW would plan to reduce that reliance and within what time frame? The word 'reduce' needs replacing with 'remove'.

#### 2.1

RCoW needs to be a strong advocate and communicator about the dangers of all types of gambling, not just EGMs

#### 2.2

RCoW must join the Alliance for Gambling Reform leadership council and show the community it takes the problem of gambling very seriously. AGR is the only group specialising in gambling reform and advocacy, supporting communities Australia wide. With Wangaratta's losses being amongst the highest in the State of Victoria RCoW needs to work with this body as a show of commitment to tackling the problems.

#### 3.5 (page 9)

Needs to include detail on the conditions in planning permits relating to the design and operation of gaming operators that enhance harm minimisation measures. What would the conditions be? How would they stand up to testing by VCAT? If they are serious effective conditions, the operator will challenge them. If they do little to reduce losses they will likely pass. Preferably RCoW will institute a blanket ban on supporting additional machines.

#### 4.3 (page 10)

Needs clarification on how working with venues supports the outcome. Venues tend to strongly disagree with research and evidence regarding the impacts of their product on public health.

#### 4.4

If RCoW receives an application for more EGMs in a particular venue the VGCCC allows only 60 days for community response. How will RCoW ensure that the community of Wangaratta is alerted to any application?

Ref	Mode	Date	Name
7	Email	29/11/2023	Submission 7

### Gambling Policy 2023 Comments on draft

#### POLICY - General comments

The RCoW Councillors are called upon to consistently and rigorously use their authority in accordance with the Planning and Environment Act 1987, the Gambling Regulation Act 2003, the RCoW Health and Well Being policy and the yet to be born RCoW Gambling Policy ( revised and strengthened after final community input ) to respond to planning permit applications for the use and installation of EGM's and gaming licence applications to the Victorian Commission for Gambling and Liquor Regulation. Our Council needs a policy which strengthens their ability to vote against applications for new EGMs and to enable the reduction of existing numbers in our LGA. They are called upon to provide real and impartial leadership on this issue.

The proposed policy is lightweight, reflects old attitudes to gambling from an uninformed cohort, is based on out of date data and does nothing to take our LGA into the future. Councillors would be wise to read the room on this one.

Council says that it is adopting a "public health approach to gambling" yet it does not address the documented link between gambling on pokies and use of alcohol.

Application of the Alcohol Use Disorders Identification Test ( WHO 2001) showed that more than half of regular pokie gamblers were high risk hazardous drinkers (Regular Pokies Gambling in Australia, 2022 Australian Gambling Research Centre)

Council should address this serious concern by reducing opportunities for pokie gambling within the RCoW. Hazardous drinking affects the whole community, it is not just an individual issue.

The research quoted above also discovered that 47.7% of regular pokies gamblers reported that they were smokers. Smokers were asked about smoking on the day of their most recent pokies session. 82.9% reported that they had smoked that day and 28.5% reported vaping nicotine. The venues are designed to enable smoking, without having to exit the premises. This is clearly a public health issue.

#### STATEMENT AND PURPOSE

" The policy seeks to achieve the following objectives:

- Protect those most vulnerable to the social and economic harm caused by gambling
- Maximise opportunities for gambling activities to deliver social and economic benefits
- Strengthen our partnerships with organisations that provide services to people directly and indirectly affected by gambling related harm
- Strengthen the community's capacity to understand the risks and impacts of gambling related harm"

These objectives are based on erroneous assumptions and do not reflect current research. The objectives should be rewritten, with community input.

A plethora of well designed studies have established beyond doubt that gambling related harms affect not only the people who gamble, but also their families, friends and the wider community

( Browne et al. 2016, Dowling 2014, Goodwin et al. 2017, Hing et al. 2020, Langham et al. 2016 and Wardle et al. 2018)

Why is the policy aiming to protect "only those most vulnerable"? I understand that the Council Health and Well Being Policy applies to all RCoW residents and visitors, not just those most vulnerable. The policy and Action Plan should address ways to restrict gambling opportunities in Wangaratta, particularly in regard to EGMs, in order to properly protect all of us from harm.

The proposed policy seeks to " Maximise opportunities for gambling activities to deliver social and economic benefits."

What are these benefits? Where is the well designed research proving that gambling can deliver social and economic benefits? On the contrary there is extensive research showing that pokie gamblers are more isolated, suffer anxiety, distress and financial stress. EGM accessibility is associated with police - recorded domestic violence incidence in postcodes in Victoria. There is also a documented link between other crimes and EGM usage These factors in turn impact family, friends and the wider community.

The Council should recognise these destructive impacts and remove all references to

" social and economic benefits" ( which remain unquantified)

Gambling losses within the RCoW are noted in The Gambling Action plan on pgs 5 and 6. The loss of \$10,84,191 per EGM player in Wangaratta equates to the \$ amount which is taken out of the community economic pool. It is difficult to see the economic benefit here, unless the Council is only thinking of the profit available to venue operators. The policy and Action Plan must contain details about how economic benefits for the whole community are assessed. The CBF should not be used to quantify contributions to the community. It is a cynical marketing and tax dodge, designed to benefit the venues so they can cover operating costs and thus increase their profit margins.

The policy must clearly articulate the difference between gambling on such things as buying a community raffle ticket and EGM usage which is linked to high levels of harm.

*Strengthen our partnerships with organisations that provide services to people directly and indirectly affected by gambling related harm*

This is an ineffective strategy as it has been established through recent research that there is a low rate of regular pokies gamblers seeking assistance for gambling harm ( Greer et al. Regular Pokies Gambling in Australia, National Gambling Trends Policy, 2022. ) 1 in 10 pokie gamblers experiencing harm, reported they had sought help.

For those people indirectly affected by gambling, the Council is planning to support organisations that provide resources for a population which would be better protected if fewer opportunities to gamble were available in Wangaratta -there is a clear relationship between accessible opportunities to gamble and the rate of gambling.

Surely the Council is not proposing to adopt a policy containing strategies which have already been proven to be ineffective? Surely the social cost of gambling should not be borne by us, the ratepayers, but by the hotels and clubs which encourage gambling?

*Strengthen the community's capacity to understand the risks and impacts of gambling related harm*

The Council is showing little leadership on this issue, so how can the community be expected to understand the risks and impacts of gambling related harm? A clear signal and policy statements are required. e.g. The Council will oppose ( not discourage) new gaming operators and /or additional EGMs in the RCo W, and the actioning of this commitment will be resourced to ensure the commitment can be met. This opposition should be well publicised.

Conclusion : The objectives need to be completely rewritten to remove bias towards EGM operators and to realistically reflect research currently available.

#### **BREACHES**

This section is weak and renders the whole policy ineffective.

#### **REVIEW**

- "The policy will be reviewed every four years by the Community and Recreation Team."

Community input should be taken into account - a transparent and public process for input should be documented in the policy. Community attitudes towards gambling need to inform decision making by those purporting to represent us. Community attitudes towards gambling are changing rapidly.

The policy should be assessed in relation to progress towards revised policy objectives via rigorous research tools. The latest, well designed research should inform policy development and reviews.

In conclusion, all Councillors and staff need access to the very latest data and credible research before they are qualified to vote on the Draft Gambling Policy and Action Plan. So much of the proposed policy and actions are based on old assumptions, outdated research, and stakeholder input at Stage 3 ( before the community has been asked their views)

What information was provided during the Councillor Briefing session? Was it research conducted in the last few years?

Who had input into the information?

Were all sides of the issue presented equally?

Which other Council policies were reviewed, and were the policies recent? Are the policies working?

Back to the drawing board on this one!



Ref	Mode	Date	Name
19	Email	29/01/2024	

### A Shameless Rort

At the August 2017 Council meeting at the Peechelba Hall, RCoW councillors voted almost unanimously in favor of the Wangaratta RSL's application for an extra 18 EGM's. According to the Council Meeting Agenda "The approval of the EGM's will provide an increase in community contributions of \$25 000 per year."

While this statement seems encouraging, the Wangaratta RSL annual Community Benefit Statement to the VGCCC reveals a different picture. The community in Wangaratta that is almost the sole beneficiary of "community benefits" is the Wangaratta RSL community, unless you believe "Operating Costs" are a community benefit.

Figures from the Wangaratta RSL's Community Benefit Statements sent to the VGCCC reveal that in 2017-18 the total of the RSL Club's Community Support Fund was \$300 000. This is based on 8.33% of EGM profits that all clubs in Victoria with EGM's are legally required to allocate to community benefits. Out of that \$300 000 the RSL Club used \$186 000 for its own operating costs.

These operating costs included \$125 000 in wages, \$13 000 for electricity, \$8 000 for superannuation, \$5 000 for insurance and \$5 000 for advertising.

In 2018-19 the RSL Club, with the benefits from 18 extra EGM's, increased their Community Support Fund to \$750 00. The RSL Club reported that \$642 000 of that money was used on operating costs. That figure is almost 90% of the total community support fund.

In 2022-23 the Community Support Fund was \$1.75 million. The RSL used \$1.5 million, close to 90% of the total fund on its own operating costs.

In Victoria clubs like the Wangaratta RSL can lawfully claim their own operating costs. They spend community benefit profits on themselves including paying for wages, electricity, superannuation, insurance and advertising as well as kitchens, fridges, television and Keno subscriptions. When they return a certain percentage of gambling profits into the community they also receive a tax cut.

In the Draft Gambling Action Plan, Wangaratta Council's commitment under Planning and Regulation 3.2 is to : "Oppose a proposal for a new gaming operator or increase in the number of EGMs in an existing venue if a rigorous social and economic impact assessments indicates it will have negative social and economic impacts on, and minimal community benefit for, the community of the Rural City of Wangaratta."

How much benefit do Wangaratta community members derive from gambling profits?  
What other businesses in Wangaratta have similar cost privileges and subsidies?

['Playing us for years': how pokies profits have funded tax-deductible spending within Australian clubs | Gambling | The Guardian](#)

Ref	Mode	Date	Name
21	Email	31/01/2024	

31/1/24

Submission to the -

## RCOW DRAFT GAMBLING ACTION PLAN

I am alarmed that Wangaratta is losing over ten million dollars a year via poker machines (EGMs). This city has quite serious levels of financial hardship happening at the moment due to steep mortgage and rent rises along with the cost of living crisis. It is not only the addicted who gamble but also people who are desperate due to dire financial circumstances. This of course can only make an individuals stressful financial predicament worse.

While this document is called an "Action Plan"...I don't see much within it's pages that could be called strong action.

It isn't exaggerating to say Wangaratta is hemorrhaging money out of the city due to EMGs. We need to do more than develop and fund support programs for the affected families (though those are important too). I ask that this action plan makes as it's priority the stemming of the waterfall of money pouring into EMGs in the RCOW.

**Accordingly my primary request is that the RCOW permanently cap the maximum number of EGMs in RCOW to what it is now - 154 machines.**

I suggest some of the benefits of this enforced limits will be -

- \* As the population of Wangaratta grows the number of machines available per head of population will decline.
- \* Any new hospitality venues that commence operation will have to develop a business plan that does not involve installing EGMs. This could benefit the community in other ways for example a new venue may offer live music, trivia nights or stand up comedy to attract customers.
- \* The existing venues that currently contain EGMs will need to devise other ways to raise revenue to renovate or expand operations other than simply installing yet more EGMs

Should the establishment of a permanent cap of the numbers of EGMs require an amendment of *The Wangaratta Planning Scheme* I ask that resources and staff hours within the RCOW be allocated in the next budget to attend to this so it can be achieved as soon as possible.

In addition I ask that each of the 4 venues that currently have EGMs have the number they are permitted to host capped at the current number that exists in each venue as of 2024. Should one of these venues close or get rid of their EGMs I would not like to see a situation where the other 3 use this situation to leverage council for an expansion of the number of machines at their own establishment.

### **Other Measures I Support**

- \* The RCOW joining the *Alliance for Gambling Reform Leadership Council*

\* Staff who work with-in the RCoW **Community Well-being Department** to be directed to make enacting the RCoW Gambling Action Plan a priority. There is no point adopting an ambitious plan to tackle the harm gambling is doing to the Wangaratta community if you are not going to allocate staff hours to enact the plan.

\* I support prohibiting RCoW grants for activities that take place in venues that are profiting from gambling.

\* I ask that council develop a standard where they do not procure any products or services from any of the four RCoW venues that profit from gambling.

### **The Local Music Industry**

Our neighbouring Indigo Shire has no EGMs. One of the direct benefits of this is Beechworth and Yackandanda have thriving live music scenes. Any weekend of the year you can go out and enjoy wonderful music in pubs in these two towns. Towns that are much smaller than Wangaratta.

The venues in these towns offer live music to attract people to come and enjoy their other hospitality offerings.

Wangaratta has been missing out on the cultural benefits of a healthy live music scene in part because we have allowed 4 venues to rest on business strategies that rely on EGMs.

I ask our council to lay the ground work for a cultural change. It is going to take time but the benefits will be multiple. In order to nurture a cultural change away from dependence on EGMs I ask that council -

\* Allocate community grants to organisations that create cultural events that enrich the entertainment offerings of Wangaratta. Encourage the Wangaratta Arts Groups to apply for community grants.

\* Include an acknowledgement in the RCoW Gambling Action Plan regarding the cultural benefits that could eventuate if Wangaratta's hospitality sector moved away from dependence on EGMs.

\* Consider reviving the RCoW **Draft Live Music Strategy**. Work on this was commenced in 2020 and then aborted shortly after. Wangaratta has never had a Live Music Strategy.....and yet we are now in need of a Gambling Action Plan.

\* Should a new Wangaratta Music Festival arise from the ashes of the former Wangaratta Festival of Jazz and Blues I suggest that the RCoW work positively with this emerging committee to ensure that any new music festival avoids embedding itself early on in venues that contain gambling.

# GAMBLING IN WANGARATTA

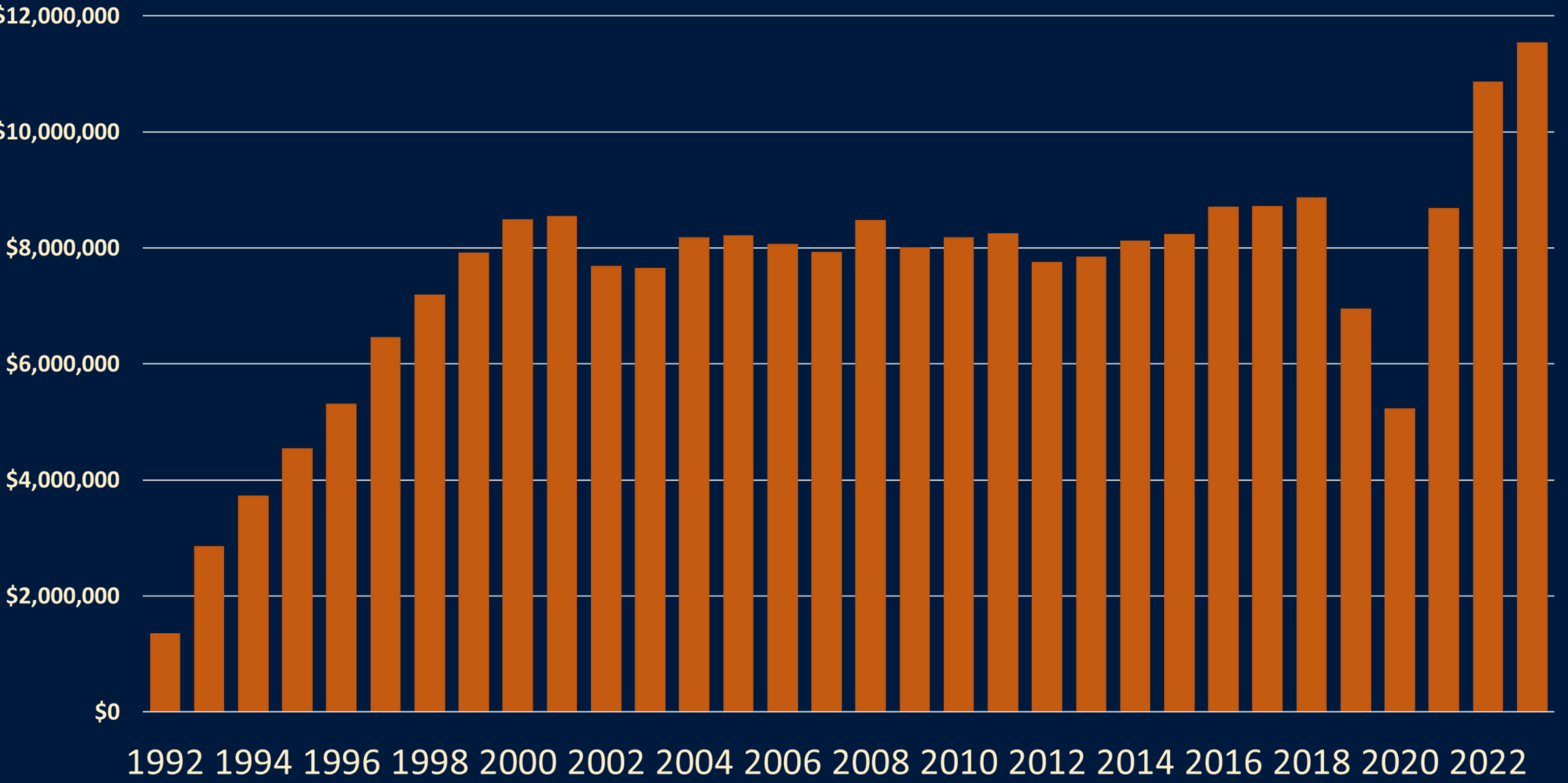
Submission

# **COUNCIL STRATEGY**

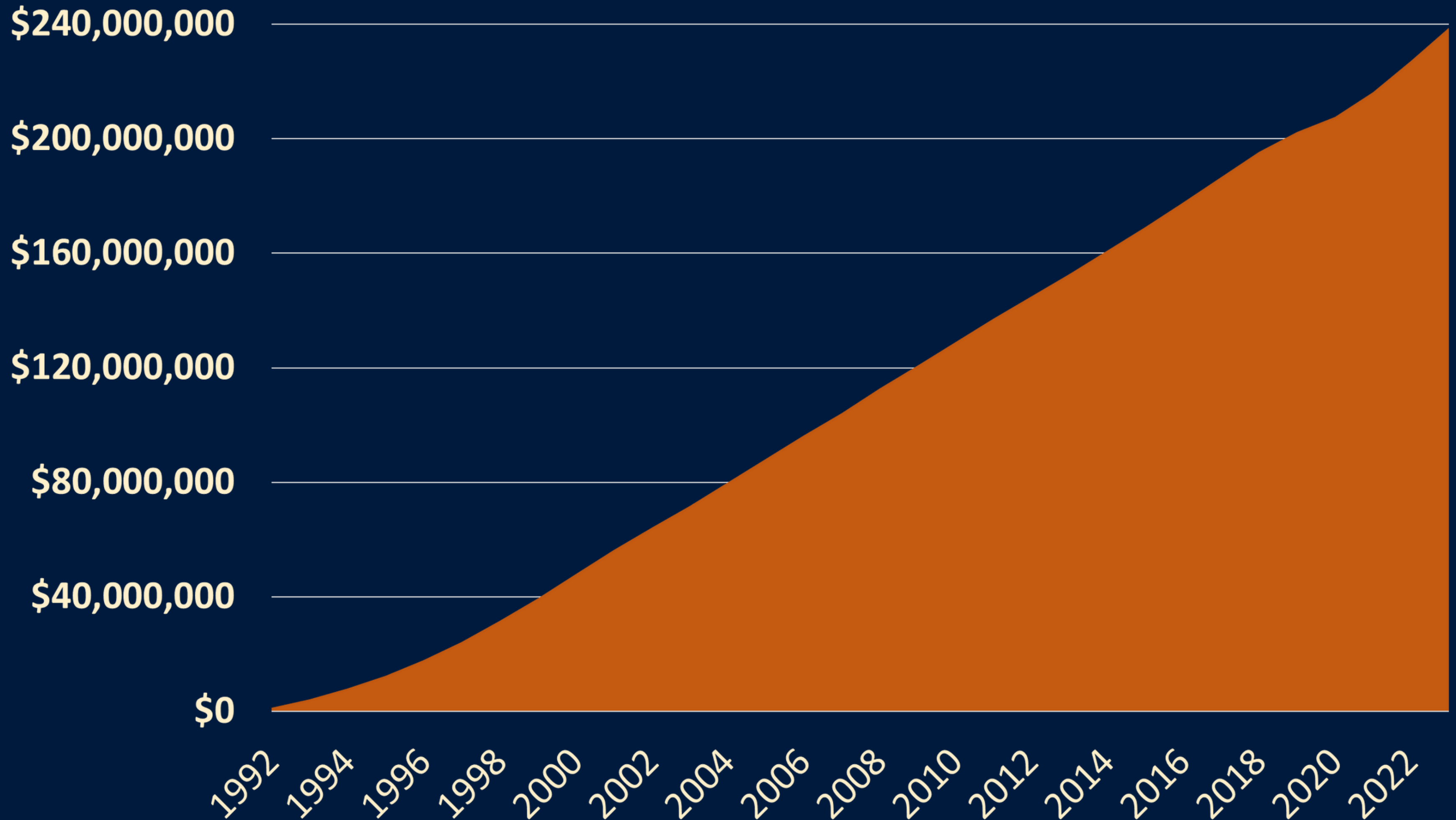
## **2021-2025**

**2.4.6 Reduce rates of gambling amongst the community.**

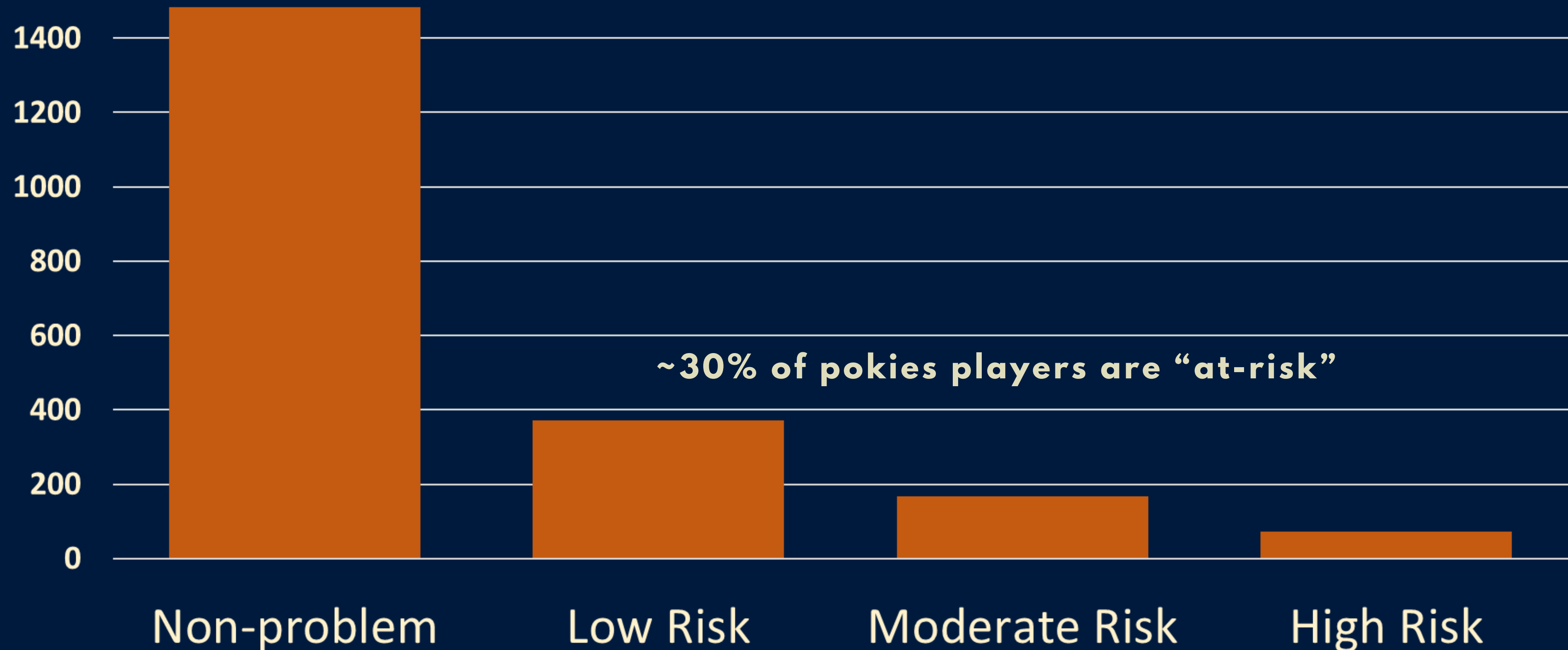
# Wangaratta EGM Losses Per Year, 1992-2023



## Wangaratta Cumulative EGM Losses, 1992-2023

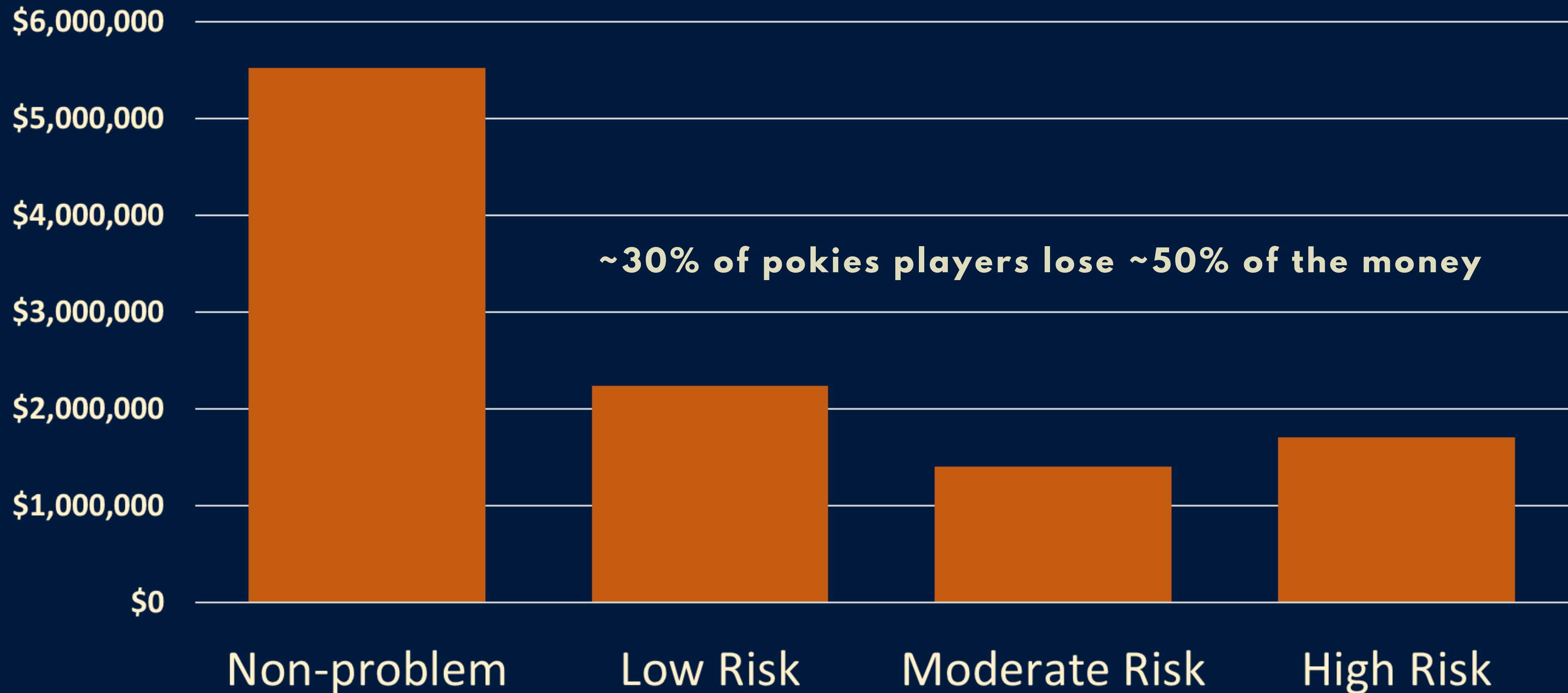


# Approx Wangaratta Pokies Players by Class

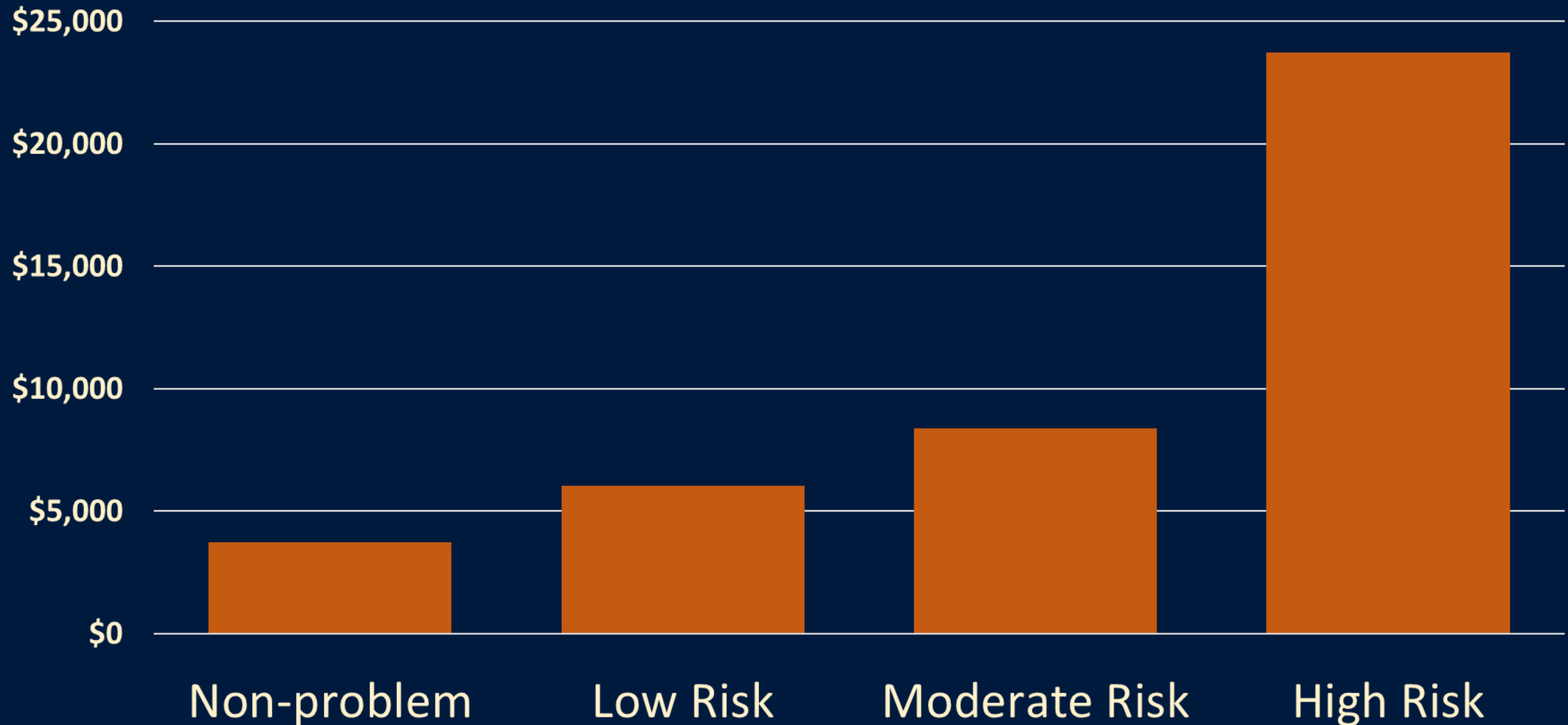




# Approx 2022 Wangaratta Total Losses by Class



# Approx Wangaratta Pokies Losses Per Player Per Year



# FOR YOUR CONSIDERATION

- Pokies are a problem.
- This policy does not address the problem.
- 6 years to draft this policy...
- ...28 days for feedback is not enough.
- If we want to meet the strategic goal, we need a stronger policy and Planning Scheme.

# IT IS POSSIBLE.

## Councils with lower-than-peak 2022 EGM losses:

**Surf Coast (-38%)**

**Bayside (-33%)**

**Stonnington (-23%)**

**Alpine (-21%)**

**Port Phillip (-21%)**

**Yarra (-19%)**

**Knox (-18%)**

**Boroondara (-16%)**

**Merri-Bek (-15%)**

**Macedon Ranges (-15%)**

**Banyule (-14%)**

**Glen Eira (-14%)**

**Yarra Ranges (-13%)**

**Hobsons Bay (-11%)**

**Manningham (-10%)**

**Darebin (-10%)**

**Monash (-9%)**

**Maroondah (-9%)**

**Frankston (-8%)**

**Kingston (-8%)**

**Whitehorse (-4%)**

**Nth. Grampians (-1%)**

**Colac-Otway (-0.3%)**

**Councils in GREEN = Members of Alliance for Gambling Reform**

**23 of 79 Councils are members**

**13 of those 23 have reduced EGM losses**

# **POLICY PROPOSALS**

- **Accurately quantify the problem**
- **Commitment to join the Alliance on Gambling Reform**
- **Commitment to join the VLGA**
- **No Council money to groups who receive pokies money**
- **Total ban on transfer of EGM licences**
- **Commitment to opposing new EGM applications**
- **Commitment to lobbying state government**
- **Additional planning scheme restrictions**
- **Commitment to fund legal action at VGCCC/VCAT**
- **Publish VGCCC-audited loss statements online**

# CITATIONS

- RCOW Council Plan 2021-25  
(<https://www.wangaratta.vic.gov.au/files/assets/public/v/1/council-plan-2021-2025.pdf>)
- VGCCC Expenditure Data (<https://www.vgccc.vic.gov.au/resources/information-and-data/expenditure-data>)
- ABS Wangaratta Data (<https://www.abs.gov.au/census/find-census-data/quickstats/2016/UCL213018>)
- Victorian population gambling and health study 2018–2019  
([https://responsiblegambling.vic.gov.au/documents/759/Population\\_study\\_2018\\_2019\\_PUBLISHED\\_REPORT\\_March\\_2020.pdf](https://responsiblegambling.vic.gov.au/documents/759/Population_study_2018_2019_PUBLISHED_REPORT_March_2020.pdf))