

# Review on the Social Impacts of Gambling

CITY OF GREATER BENDIGO

NOVEMBER 2018

## Contents

Key terms	2
1. Introduction	3
1.1 The need for an updated Greater Bendigo gambling policy	3
1.2 Gambling – a priority within the City’s strategic framework	4
1.3 Public health approach to gambling	4
1.4 Review objective and structure	4
2. Gambling in Greater Bendigo	6
2.1 Gambler’s Help	8
2.2 Gambling activity in Australia	9
3. Understanding the issues: the social impacts of gambling	12
3.1 EGMs in disadvantaged communities	12
3.2 Gambling related harm	15
3.3 Demographic breakdown on gambling-related harm	18
3.4 Community Benefits of Gambling	20
3.5 Gaming and gambling in children and adolescents	21
3.6 Benefits of gambling	22
3.7 The impact of gambling on family, friends and the community	23
3.8 Gambling and the justice system	24
3.9 Low-risk and moderate-risk gambling	25
3.10 Comorbidities	26
4. Opportunities for Action	28
4.1 Key Summary	28
4.2 Additional points to consider for the <i>Reducing Harm from Gambling Policy</i>	28
References	31
Appendices	33
Appendix One: Index of relative socio-economic disadvantage	33
Appendix Two: Background information on EGMs and the Council’s role in the application process	34
Appendix Three: EGM data for Greater Bendigo and neighbouring councils compared to the state average	36
Appendix Four: A review of some key gambling polices from across Victoria	37
Appendix Five: Council survey on gambling policy development (conducted by the VLGA in May 2018)	40

## Key terms

<b>Bingo</b>	A game in which players mark numbers off on a personal card as numbers are drawn randomly. The winner is the first player to mark off all numbers on the card.
<b>CBD</b>	Central business district
<b>City</b>	City of Greater Bendigo
<b>Community benefit statement</b>	A yearly statement clubs lodge to the VCGLR that verifies whether community benefit is equal to at least 8.33% of its net EGM revenue.
<b>Council</b>	For the purpose of this report 'Council' refers to the Greater Bendigo City Council.
<b>Gambling-related harm</b>	Any kind of harm or distress arising from, or caused by, a person's gambling
<b>EGM</b>	Electronic Gaming Machine, also known as poker machines, fruit machines or pokies. EGMs are controlled by a computer program that 'spins' computer-simulated reels to match symbols on a screen. The technology can generate thousands of combinations per second, allowing the machine to determine whether the resulting position of symbols is a winning or losing combination.
<b>Entitlements</b>	Entitlements must be attached to a venue by the VCGLR. This determines the number of machines the venue operator can operate.
<b>Keno</b>	A game in which a player gambles that their chosen numbers will match any of the 20 numbers randomly selected from a group of 80 numbers via a ball-draw device or computer program.
<b>LGA</b>	Local government area
<b>Lotto</b>	Usually a game in which a player selects six numbers from 1 to 45, in hope that they will be amongst eight numbers randomly drawn from a ball-draw device containing 45 balls numbers from 1 to 45. Lottery games include Tattsлото and Powerball, or other games that involve a ticket, a draw and a prize.
<b>Net expenditure</b>	The total amount spent (or lost).
<b>PGSI</b>	Problem Gambling Severity Index, a standardised measure of at-risk behaviour in problem gambling. A tool based on research of the common signs and consequences of gambling.
<b>Poker</b>	A card game involving multiple players in which the winner of each hand is determined according to the combination of players' cards.
<b>Private betting</b>	Unregulated and informal betting. For example, cards or mah-jong.
<b>Race betting</b>	Includes wagering on the outcome of horse, pony or greyhound racing but does not include sweeps.
<b>Regular gamblers</b>	Adults who spend money on one or more gambling activities in a typical month.
<b>SEIFA</b>	Socio-economic Index for Areas
<b>Sports betting</b>	Wagering on sporting activities or events, excluding horse, pony or greyhound racing.
<b>Table games</b>	Usually played at a table in a casino, table games include a dealer and multiple players who wager on the outcome of the game. Examples include roulette, craps, black jack and baccarat.
<b>VCAT</b>	Victorian Civil and Administrative Tribunal
<b>VCGLR</b>	Victorian Commission for Gambling and Liquor Regulation
<b>VLGA</b>	Victorian Local Government Association
<b>VRGF</b>	Victorian Responsible Gambling Foundation

## 1. Introduction

The current City of Greater Bendigo (the City) gaming policy *Accessible but not Convenient* was developed in 2007. Since this policy was developed, there have been statutory and regulatory changes, and significant work has been undertaken to better understand the social and economic impacts of gambling. The City recognises the importance of this and has included 'reducing harm from gambling' through updating the City's gambling policy as a priority area in the 2017 – 2021 Community Plan and Greater Bendigo Municipal Public Health and Wellbeing Plan.

In 2011, the Victorian Parliament created the Victorian Responsible Gambling Foundation (VRGF). The VRGF has undertaken extensive research and has formed an evidence base for reducing harm from gambling. This improved understanding of the quantity and quality of harm will assist the City to better target efforts to prevent or minimise the potential negative consequences of gambling.

It is within this broad framework that the City embarks on the development of a new gambling policy that will outline Council's approach to reducing harm from gambling across the Greater Bendigo community from a public health perspective. The new policy will be referred to as the City's *Reducing Harm from Gambling Policy* (the Policy) and will draw extensively on current gambling research. Community attitudes towards gambling are also changing, and it is necessary for local government and its partners to develop a range of methods to respond to this. Expanding focus from the prevention of 'problem gambling' to the reduction of gambling harm will mitigate the negative impact of gambling across a broader section of the Victorian community.

### 1.1 The need for an updated Greater Bendigo gambling policy

Research and data have significantly influenced debate on EGMs since 2007, leading to gambling now being widely accepted as a public health issue. In 2010, the Productivity Commission's public enquiry into Australia's gambling sector stated that 'a more coherent and effective policy approach is needed, with targeted policies that can effectively address the high rate of problems [associated with gambling]'. Many local Councils have responded to this and have recognised that the gambling industry is causing unacceptable amounts of harm within their communities.

Greater Bendigo's current gambling policy framework *Accessible but not Convenient* has a focus on 'problem gambling' and suggests that gambling venues should be located in areas that reduce opportunity for 'convenience gambling'. It is now widely recognised that gambling-related problems occur to the individual gambler, family and friends, and the broader community. Whilst venue accessibility and locality remain important for harm minimisation, Council can address this through amendments to the Planning Scheme or leasing policies.

A review of the policy framework, in addition to reviews on the social and economic impacts of gambling, will identify areas of improvement and place Council in a better position for future discussions surrounding EGM applications. They will also assist in the development of the new, public health focused policy that accounts for emerging evidence on gambling harm and its impact on community health and wellbeing.

## 1.2 Gambling – a priority within the City’s strategic framework

Updating the gambling policy has been identified as a priority within the City’s broader planning framework. Action 2.1.2 of the *Community Plan 2017-2021* is to update Council’s gaming policy. ‘Reducing harm from gambling’ is also listed as a strategic objective in the Greater Bendigo Health and Wellbeing Plan 2017-2021.

## 1.3 Public health approach to gambling

The Productivity Commission recognises the complimentary roles of harm minimisation and health promotion in gambling policy development<sup>1</sup>. Public health policy frameworks emphasize the importance of addressing individual and community behaviours, as well as managing the relevant environment. Successful models for control include smoking, SIDS and campaigns to reduce road traffic accidents. The nature of these problems have largely been reconfigured, with harm being minimised and wellbeing promoted. These approaches also included the adoption of material measures that shift responsibility from the consumer to the provider.

Nomenclature and language are important for effective public health communication, therefore terms that provide the notion that responsibility lies with the individual, such as ‘responsible gambling’ or ‘problem gamblers’, should not be used. Moving forward, it is recommended that in all gambling communication Council use public health language that reflects the type of policy it is pursuing.

## 1.4 Review objective and structure

This social impact review will allow the City to better understand the positive and negative impacts of gambling and how they affect the Greater Bendigo community. The report will incorporate findings from relevant research and policies, the *Accessible but not Convenient* review and review on the

---

<sup>1</sup> (Productivity Commission, 2010)

economic impact of gambling. It will also identify opportunities for the new *Reducing Harm from Gambling Policy*.

Chapter Two will look at the current gambling landscape in Greater Bendigo and will provide information on the number and location of EGMs within the municipality. It will also include an overview of gambling activity in Australia and will summarise recent research on the social impacts of gambling. Chapter Three has been divided into subsections that first provide a background on literature and statistics on social impacts, and how they apply to the context of Bendigo. Each subsection will also make recommendations on how the Policy can mitigate these (predominantly) negative impacts of gambling for the Greater Bendigo community. Chapter Four will summarise the key findings from the review on the social impacts of gambling, and list additional opportunities for consideration during policy development.

## 2. Gambling in Greater Bendigo

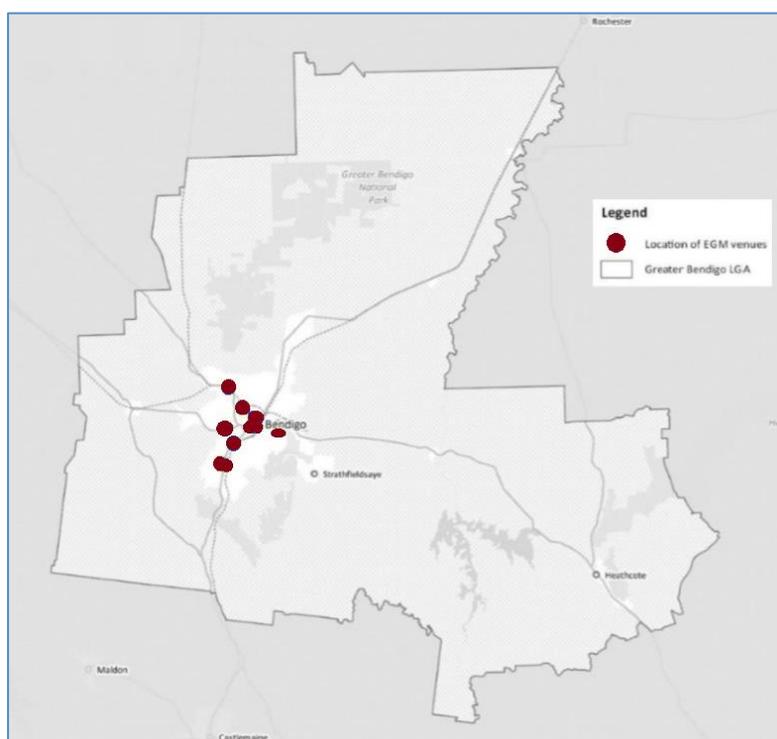
Of the many forms of gambling, EGMs are the most harmful. They are also the only form of gambling Council can directly influence through policy, regulation and advocacy. Therefore, local government area (LGA) data regarding EGM location and expenditure is readily available. Localised information for other gambling platforms is either very difficult to obtain due to the nature in which they occur (for example, online gaming), or are calculated from statistics included in State or Federal resources.

In September 2017, the Minister for Consumer Affairs, Gaming and Liquor Regulation announced numerous changes to regional caps and municipal limits on gaming machine entitlements. Effective from November 2017, the new maximum permissible number of EGM entitlements within Greater Bendigo was increased from 663 to 870.

At June 2018, there were 618 poker machines and 657 entitlements within the municipality. An additional 213 machines may therefore be installed in Greater Bendigo before the cap is reached, making it an attractive target for potential EGM operators.

EGMs are abundant within Bendigo area. Figure One, below, shows the location of venues that offer EGMs within the municipality. All EGM operators fall within a six-kilometre radius from the centre of Bendigo.

**Figure 1: The location of licensed EGM venues in 2018**



Source: VCGLR 2018, August 2018

Table 1, below, shows the EGM operators in Greater Bendigo during the 2017/18 financial year. The Windermere Hotel in Kangaroo Flat had the highest expenditure per machine at \$149,990 and the Kangaroo Flat Sports Club had the lowest at \$38,201 per machine. Data for the City Family Hotel and the Bendigo Club is skewed for the 2017/18 financial year due to fluctuation in EGM numbers (see Table 1 notes for more information). The VCGLR stipulates that the maximum number of EGMs a Victorian venue can operate (excluding Crown Casino) is 105.

**Table 1: Venue details and statistics during the 2017/18 financial year**

	Venue	Type	2017/18 Net EGM expenditure (millions)	Number of EGMs in June 2018	Attached entitlements	Expenditure per EGM per year
1	All Seasons International Hotel Bendigo	Hotel	\$11.06	100	100	\$110,639
2	Bendigo District RSL Club	Club	\$7.39	93	93	\$79,463
3	Bendigo Stadium	Club	\$6.21	105	105	\$58,143
4	City Family Hotel*	Hotel	\$0.61	0	39	\$15,562
5	Kangaroo Flat Sports Club	Club	\$2.29	60	60	\$38,201
6	Rising Sun Hotel	Hotel	\$3.75	35	35	\$107,119
7	Shamrock Hotel	Hotel	\$4.0	60	60	\$66,646
8	The Bendigo Club^	Club	\$2.60	60	60	\$43,296
9	The Borough Club	Club	\$3.40	40	40	\$84,939
10	The Foundry Hotel Complex	Hotel	\$2.03	25	25	\$81,176
11	Windermere Hotel	Hotel	\$6.00	40	40	\$149,990
	<b>Total</b>		<b>\$49.34</b>	<b>618</b>	<b>657</b>	

Source: VCGLR 2018, August 2018

\*The City Family Hotel closed for business on 31 August 2017 but opened again in late 2018

^The Bendigo Club added an additional 16 EGMS during the 17/18 financial year which means the expenditure per EGM value will be skewed for that particular year.

Additional information on Greater Bendigo that is of relevance to this review:

- The City of Greater Bendigo has a lower EGM expenditure per adult in comparison to the State average
- There are 6.8 EGMs per 1000 adults, compared to the State average of 5.1
- Greater Bendigo has the 25th highest pokies expenditure in Victoria (metropolitan and regional)

- Outside of metropolitan Melbourne and Geelong, Greater Bendigo has the second highest EGM expenditure in Regional Victoria (Ballarat has the highest)
- Greater Bendigo is ranked 31<sup>st</sup> in Victoria for socio-economic disadvantage
- Net EGM expenditure tends to be higher between July and December, coinciding with the festive season and colder months of the year
- There is a tendency for EGMs and gambling venues in Greater Bendigo to be located in areas of socio-economic disadvantage.

During the 2017/18 financial year:

- \$135,165 was spent on EGM's within Bendigo per day
- Almost \$50 million was spent on local EGMs, an increase of 3.3% from the previous financial year
- The average amount spent on EGMs was \$556 per adult in Greater Bendigo.

## 2.1 Gambler's Help

Gambler's Help is a free and confidential state-wide problem gambling service that offers a range of counselling services to people experiencing harm from Gambling, including their partners and close family members. Funded by the VRGF, their services are provided by a range of community organisations across metropolitan, regional and rural Victoria.

Anglicare Victoria coordinate the Gambler's Help program in the Loddon Mallee region. Their Greater Bendigo office is located in central Bendigo. In addition to counselling services, Gambler's Help provide:

- Support to gaming venue staff so they can identify and respond to gambling harm,
- Integration with other health services,
- Community education about the early signs of gambling harm and how community members can access support.

Gambler's Help tailor their community education program according to population groups within each municipality that are at greatest risk of experiencing gambling harm. In Greater Bendigo, the three focus areas are:

- Youth,
- Mental health, and
- The justice system.

Gambler's Help are limited by VRGF to working with three vulnerable population groups due to limited resources and in order to meet objectives. However, it was mentioned in discussion with a local Gambler's Help staff member that they provide a large amount of services to individuals with drug and alcohol dependence and for both victims and perpetrators of family violence. For the purpose of consistency, family violence is reported under 'Justice' and work with the drug and alcohol sector under 'Mental health'<sup>2</sup>.

## 2.2 Gambling activity in Australia

A cross-sectional analysis of the Household, Income and Labour Dynamics in Australia (HILDA) Survey data provided an overview of gambling participation, expenditure and problems among people who gambled regularly in 2015<sup>3</sup>. Regular gambling refers to people who spend money on one or more of ten common gambling activities in a typical month. Common gambling activities include lotteries, instant scratch tickets, EGMs, race betting, sports betting, keno, table games, bingo, private betting and poker. The HILDA survey collected data on problem gambling by asking participants whether they endorsed one or more items on the Problem Gambling Severity Index (PGSI).

The following points were key findings of the analysis:

- Almost 40% of Australian adults are regular gamblers. Amongst these, participation in lotteries was the most common (76%), followed by scratch tickets (22%) and EGMs (21%).
- Despite this, individual gamblers spend significantly more per year on other forms of gambling. For example, EGMs (\$1,292), race betting (\$1,308), sports betting (\$1,032), table games (\$1,369) and poker (\$1,758) as opposed to lotteries (\$695) and scratch tickets (\$248).
- Regular gamblers had very different profiles when viewed according to gambling activity. For example:
  - EGM regular gamblers were overwhelmingly people who received welfare payments as a main source of income (29%), were retired (31%), or were people over the age of 50 years (60%).
  - Regular race or sports bettors were over-represented among men who had higher incomes, but race bettors were more likely to be men who were older and who lived in regional or remote areas and sports bettors were more likely to be younger and live in major cities or inner-regional areas.
  - Lottery participants were more likely to be older couples living without children.

---

<sup>2</sup> Discussions with the Gambler's Help Community Educator were held in June and September 2018.

<sup>3</sup> (Armstrong & Carroll, 2017)

- More than 16% of regular gamblers were estimated to have behaved in ways that either caused or put them at risk of gambling-related problems.
  - This subset of regular gamblers experiencing problems were more likely to be young, single, unemployed or not employed (excluding retirees and students), Indigenous, men, living in rental accommodation, in a low socio-economic area and were more likely to draw income from welfare than gamblers who hadn't experienced gambling-related problems.
  - Problems were particularly high amongst those who partook in EGMs, race and sports betting, table games, poker and private betting. Regular gamblers with problems were also found to have higher than average spending on gambling, specifically on EGMs, race and sports betting.
- Gambling expenditure living in low-income households spent a larger proportion of the household's total disposable income on gambling than high-income households – 10% compared to 1%.
  - This figure was significantly larger for households with a gambler that experienced problems. In these households, an average of 27% of disposable income was spent on gambling. This was the equivalent of four times the yearly household utility bills, or half the grocery bill. As a result, problem gamblers asked family members or friends for financial assistance, or were unable to pay gas, electricity or phone bills.
- Gambling platforms have been rapidly evolving throughout recent years. Compared with 20 years ago, Australians have begun to move away from games that emphasise chance (including lotteries, keno and EGMs), and are now participating in activities that emphasise skill and experience (such as sports betting, race betting and some table games)<sup>4</sup>.

In 2010, the Productivity Commission found that when EGMs are played at a high intensity, a player can lose up to \$1500 per hour<sup>5</sup>. During the 2015/16 financial year, Australian player expenditure was \$23.7 billion dollars. This roughly equates to the same amount of alcohol sales and represents more than 3% of total final household consumption expenditure. Figure 2, on the next page, shows the 2015/16 breakdown of gambling industry revenue, or amount lost by the Australian population<sup>6</sup>. The HILDA analysis and Productivity Commission report, in addition to current research on gambling and the burden of harm, emphasize the detriment that EGMs have on individual and community health and wellbeing. The following sections will explore the social impact of gambling in the context of Greater Bendigo. Suggested responses and opportunities for the City's updated gambling policy will also be discussed.

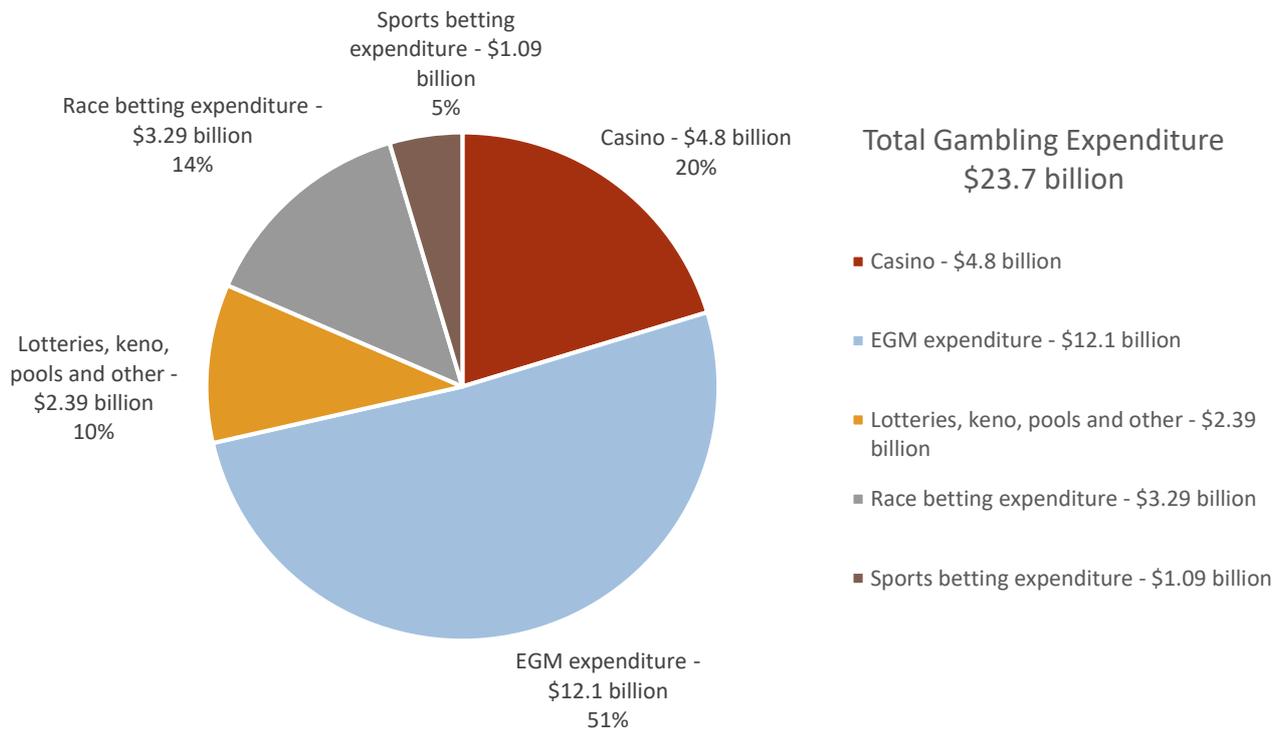
---

<sup>4</sup> Armstrong

<sup>5</sup> (Productivity Commission, 2010)

<sup>6</sup> (Queensland Government Statistician's Office, 2018)

**Figure 2: Total amount lost by the Australian population in 2015/16**



Source: Queensland Government Statistician's Office (2018)

### 3. Understanding the issues: the social impacts of gambling

The previous chapter looked at gambling platforms and how much money is being lost on gambling. This chapter will explore the consequences and social impact of this loss on individuals and the community. A literature review has guided this section and resulted in the identification of specific categories that are relevant to the gambling landscape in Greater Bendigo. Each category also outlines the actions Council could consider during development of the Policy.

#### 3.1 EGMs in disadvantaged communities

EGM density across Victoria generally tends to be the highest among the least affluent states<sup>7</sup>. The Australian Bureau of Statistics (ABS) uses Socio-Economic Indexes for Areas (SEIFA) to rank areas in Australia according to relative socio-economic advantage and disadvantage based on information gathered in the Census. The ABS broadly define socio-economic advantage and disadvantage in terms of people's access to material and social resources, as well as their ability to participate in society.

Figure 3, on the following page, shows SEIFA areas of advantage and disadvantage in the Greater Bendigo municipality. The shades indicate index level, which is derived from attributes that reflect disadvantage. These attributes include low income, low educational attainment, high unemployment, and jobs in relatively unskilled occupations. A higher index score (indicated by lighter shades in Figure 3) means a lower level of disadvantage. Lower index scores (darker shades) mean higher levels of disadvantage. For a more detailed breakdown of SEIFA index and percentiles per suburbs, please refer to Appendix One.

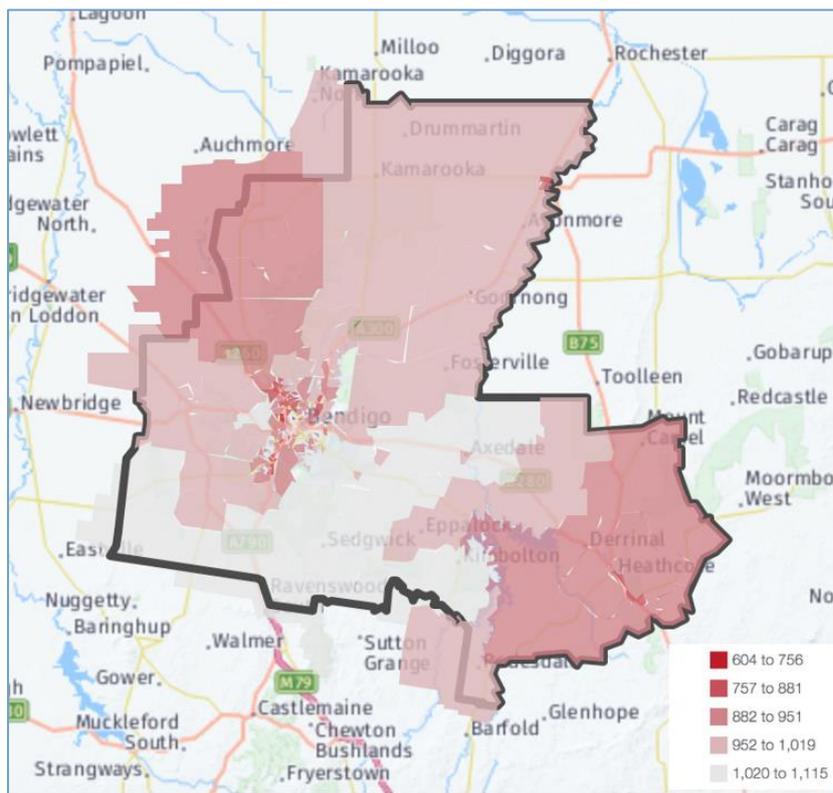
The location of EGMs is also just as important as their density, with research finding a correlation between EGM use, problem gambling and disadvantaged communities<sup>8</sup>. Figure 4, taken from the Economic Impact Review conducted by SGS Economics and Planning, depicts a more detailed view of SEIFA index areas in addition to EGM locations within Bendigo. Figure 4 shows that all EGM operators in the municipality are located in strongly disadvantaged areas.

---

<sup>7</sup> Refer to Appendix Three for more EGM data on Greater Bendigo and neighbouring LGAs. Note that information on Greater Dandenong and Boroondara have been included as a comparative tool. Greater Dandenong is ranked second for socio-economic disadvantage in the State and has the highest EGM expenditure of \$927 per adult in the 2017/18 financial year. In comparison, City of Boroondara is one of the State's most affluent local government areas and has one of the lowest EGM expenditures of \$142 per adult.

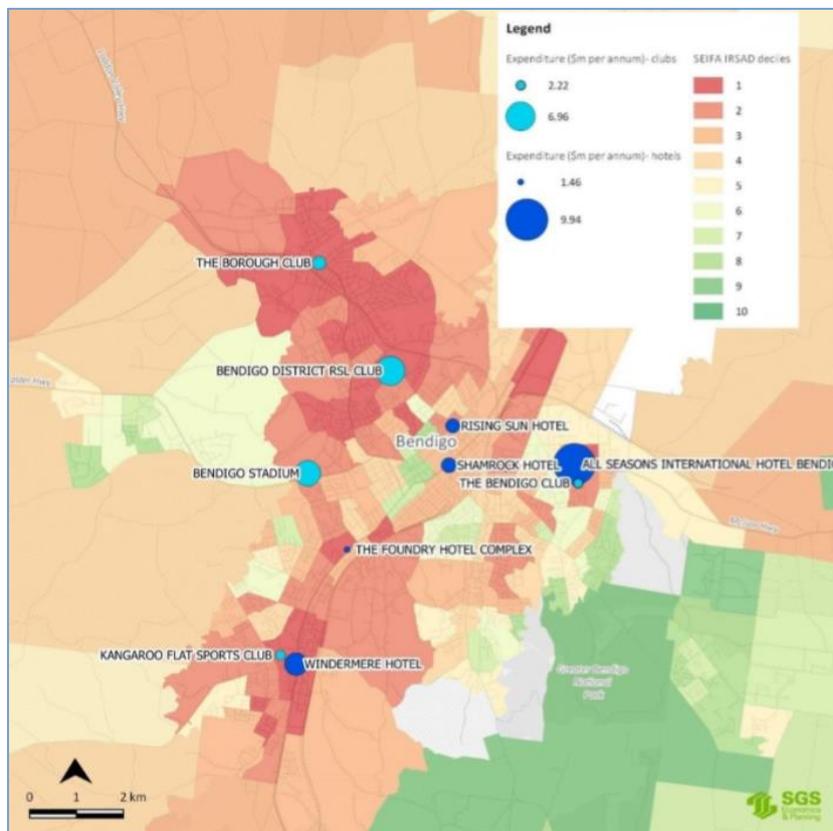
<sup>8</sup> (Hare, 2009)

Figure 3: SEIFA index of advantage and disadvantage in 2016



Source: atlas.id (2018) from ABS data (2016)

Figure 4 Greater Bendigo venues, expenditure and SEIFA deciles in 2017/18



Source SGS Economics and Planning (2018)

As shown in Table 2, below, Greater Bendigo’s EGM density and unemployment rates are well above Regional Victoria and the State’s averages.

**Table 2: Local and state gambling social statistics**

	Greater Bendigo	Regional Victoria	Victoria
<b>Total Net Expenditure (\$)</b>	47,754,127.20	562,643,025.81	2,609,530,060.33
<b>SEIFA DIS Score</b>	983.07	977.0	1010.0
<b>State disadvantage rank</b>	31		
<b>Adult population (2017)</b>	86,565	1,167,733	4,815,889
<b>Adults per venue</b>	7,870	6,312	9,690
<b>EGMs per 100 adults (2017)</b>	7	6	5
<b>Expenditure per adult (2017)</b>	551.66	481.83	541.86
<b>Workforce (June 2017)</b>	53,436	777,561	3,296,302
<b>Unemployed (June 2017)</b>	2,318	42,070	194,978
<b>Unemployment rate (June 2017)</b>	7.49%	5.3%	5.0%

Source: VCGLR (2017)

## Council

Council plays an important role in the process of EGM approvals and can directly influence their planning and location. Harm reduction strategies can include Council discouraging additional EGMs in disadvantaged areas or in small communities where there is little alternative attractions or leisure activities. Many small communities outside of Bendigo have lower percentiles on the SEIFA index. For example, only 15% of Australian small areas or suburbs are more disadvantaged than Heathcote and District. One of the benefits of smaller communities is that community attitudes towards developments can heavily influence decision-making. Having a better understanding of the community’s attitudes towards EGMs would strengthen Council’s stance on EGMs in advocacy work and submissions regarding future EGM applications. This would be an important topic for inclusion should there be additional health and wellbeing surveys.

The Policy will also guide changes in the Greater Bendigo Planning Scheme, which controls land use and development within the municipality. As suggested by K2 Planning’s review of *Accessible but not Convenient*, Council will have the opportunity to update the Planning Scheme to account for recent developments, updated data and changes to land zoning. Whether Council chooses to respond to future applications on a case-by-case basis or has a zero-tolerance stance, it is pertinent the new policy contains a section on EGM regulation that addresses the geographical nuances of EGM location impact.

## 3.2 Gambling related harm

In 2016, the Victorian Responsible Gambling Foundation developed a framework and methodology to better understand and measure gambling-related harm in Victoria. In doing so, the project aimed to better target efforts to prevent or reduce the negative consequences of problematic gambling by adopting the health state valuation methodology to assess the impact of gambling harms<sup>9</sup>.

**Figure 5: Proportion of gambling-related harm in Victoria by risk category**



Source: Browne et al. (2016)

Although harm from problem gambling is the most severe, it is also the least prevalent form. Harm from low and moderate-risk gambling causes a greater burden on the community due to the larger number of people affected. Low-risk gambling problems are more prevalent than depression and are present at almost half the prevalence of harmful use of alcohol. Problem gambling is twice as common as schizophrenia and occurs at more than half the prevalence of alcohol dependence. The aggregate impact of gambling problems exceeds that of cannabis dependence, schizophrenia, epilepsy and eating disorders combined<sup>10</sup>. These figures demonstrate how gambling is, and should be treated, as a public health issue of similar importance to many other health conditions.

The study found that gambling-related harm is manifested at the individual, social and community levels, and can be broadly grouped into six domains:

- Decrements to the person's health, both morbidity and mortality
- Emotional or psychological distress

<sup>9</sup> (Browne, et al., 2016)

<sup>10</sup> (Browne, et al., 2016)

- Financial difficulties, diverted financial resources, bankruptcy or reduction of financial situation
- Reduced performance / loss of role at employment or study
- Relationship conflict or breakdown
- Criminal activity and neglect of responsibilities, including the consequences of such actions.

These domains are closely related to the five categories of costs associated with gambling<sup>11</sup>.

Other findings of the study include:

- Harm to 'affected others', most notably family and friends, should be acknowledged and measured
- Gambling harms can affect multiple domains of health and wellbeing
- Since individuals subjectively experience harm as a decrement to their health and wellbeing, existing public health methodologies should be applied to measure this decrement.

Building on these findings, further research by the Foundation aimed to assess the social costs associated with gambling in Victoria in financial terms. The second phase of the study estimated the cost for all severity levels and found that, when low and moderate-risk categories were included, the social cost of gambling in Victoria in 2014/15 was \$7 billion. Previously this figure was thought to be \$2.4 billion when solely calculated using the more severe, but less prevalent, problem gambling group.

The study expanded upon the six domains of gambling-related harm listed above, whilst also categorising the social cost of gambling to the Victorian government. The types and costs of gambling harm are as follows:

- \$2.2 billion – family and relationship problems
- \$1.6 billion – emotional and psychological issues, including distress, depression, suicide and violence
- \$1.3 billion – financial losses through, for example, excessive spending on gambling, bankruptcy and illegal offshore gambling
- \$1.1 billion – costs to the Victorian government, such as research, regulation, and professional support services, including mental health and homelessness services
- \$600 million – lost productivity and other work-related costs
- \$100million – costs of crime, including to businesses and the justice system.

---

<sup>11</sup> The five categories of costs are: financial costs, productivity and employment costs, crime and legal costs, personal and family costs, and treatment costs (Browne, Greer et al. 2017).

A further breakdown of the estimated costs of gambling harm is shown in Table 3, below.

**Table 3: Estimated costs for categories of gambling harm in Victoria in 2014/15**

Category	Low-risk gamblers (PGSI 1–2)	Moderate-risk gamblers (PGSI 3–7)	Problem gamblers (PGSI 8+)	Total cost to Victoria (2014–15)
Financial	\$315,582,939	\$337,505,836	\$479,372,995	\$1,348,095,911
Emotional and psychological	\$815,133,289	\$477,189,959	\$300,633,433	\$1,592,956,680
Relationships and family	\$589,825,106	\$585,809,945	\$1,013,261,621	\$2,188,896,672
Crime – Victorian justice system	\$26,968,703	\$31,229,297	\$41,985,008	\$100,183,007
Productivity loss and work impacts	\$64,504,422	\$195,190,478	\$338,176,056	\$597,870,956
Cost to the Victorian Government	\$634,247,824	\$275,246,025	\$183,788,212	\$1,145,477,560
<b>Total cost</b>	<b>\$2,446,262,283</b>	<b>\$1,902,171,540</b>	<b>\$2,357,217,325</b>	<b>\$6,973,480,788<sup>3</sup></b>

Source: Browne et al. (2017)

Results from both quantitative and qualitative phases of research confirmed that gambling problems are associated with financial pressures, and that they result in damage to relationships that result in psychological and emotional distress. These are instrumental for an individual’s health and wellbeing and quality of life. It is important to note that ‘health’ itself has many domains, including physical and mental health, personal wellbeing and community wellbeing. The harms that result from excessive time and money spent on gambling, in addition to social failure or distress, can impact on these domains and negatively impact the broader community. The study’s concluding remark was that gambling generates social costs that “appear to be out of relation to the scale of the industry, the tax revenue generated, and any generous assumptions about the likely recreational value of the activity to Victorians”<sup>12</sup>.

In 2014, of the 83,265 adults in Greater Bendigo:

- 693 people experienced problem gambling (0.81%)
- 2,396 people undertook moderate-risk gambling (2.8%)
- 7,616 people undertook low-risk gambling (8.9)
- 49,285 participated in gambling but may not have experienced harm (57.6%)
- The remainder did not take part in any gambling activities.

<sup>12</sup> (Browne, Greer, et al. 2017 pp.93)

## Council

Previously, gambling reform and public health efforts have been directed towards the prevention or assistance of people who are problem gamblers. Recent research into gambling-related harm has enabled us to better understand that the largest aggregate source of harm occurs outside of this group. Therefore, a public health approach to gambling policy should develop a broader health focus on gambling problems within the community rather than chronic gamblers with severe problems. Furthermore, family and relationship problems and emotional and psychological issues are the costliest categories of gambling harm in Victoria. Local support and counselling services, such as Gambler's Help, work directly with community members and their relations to mitigate and reduce the negative impacts of gambling. Collaboration and support for services such as this will further demonstrate Council's commitment and strengthen its advocacy work to higher levels of government.

Council should not support the gambling industry in any form. Council can demonstrate one of its' values through leading by example. Council can limit community members' exposure to EGMs by not holding meeting or events at venues that operate EGMS. It can also advocate that other government bodies follow suit. Many people are unaware of the risks associated with playing EGMs, and the harm that this can have on others. By continuing the gambling discussion, Council can continue to ensure that harm is minimised and community awareness of potential negative impacts it maintained.

### 3.3 Demographic breakdown on gambling-related harm

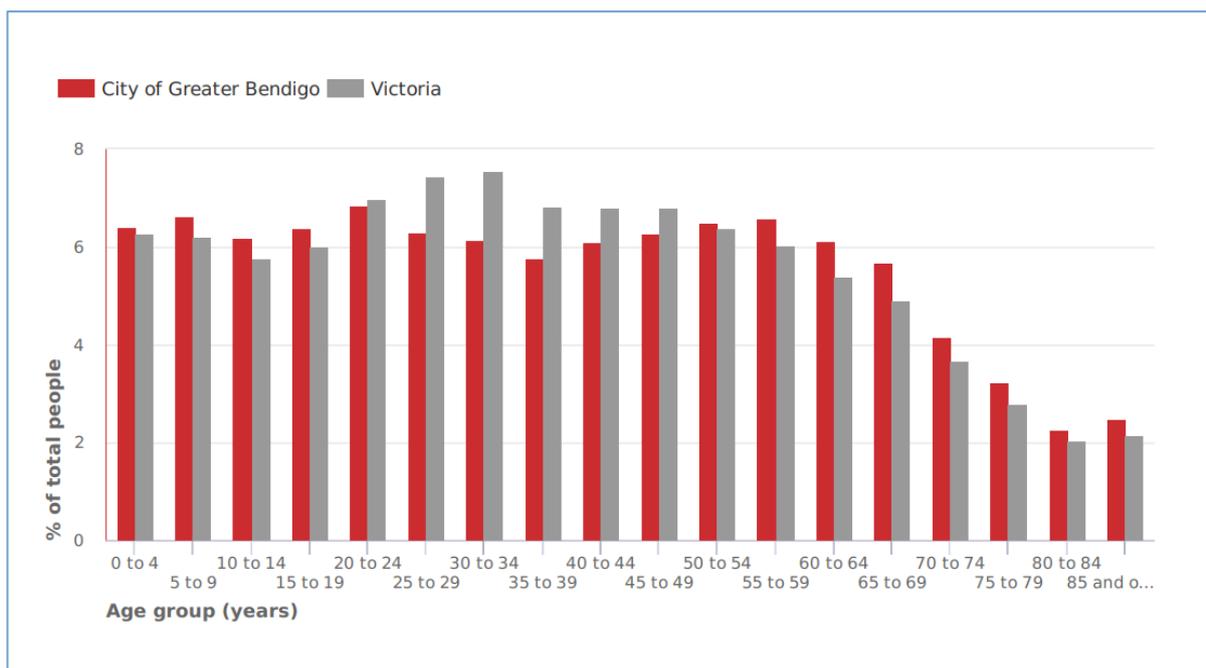
- Males make up a higher percentage of problem and moderate-risk gamblers, whereas females are over-represented amongst low-risk gamblers. The result is that harms are reasonable equally distributed between both genders.
- 41% of gambling harm can be attributed to people over 55 years, with females aged 55 and older making the greatest single contribution to the aggregate burden of harm at nearly 15%<sup>13</sup>.
- The target audience for online gambling is young men (and increasingly, women). This is the demographic that gambling research has tended to focus on due to increase in likelihood of developing gambling problems<sup>14</sup>.
- However, there is a correlation between increased gambling by older women as their traditional gendered caring roles decrease (also resulting in an increase in social isolation and loneliness).

---

<sup>13</sup> (Browne, et al., 2016)

<sup>14</sup> (Livingstone & Conroy, 2018)

**Table 4: Age structure of Greater Bendigo and Victorian populations in 2016**



Source: Australian Bureau of Statistics, Census of Population and Housing, 2016. Compiled and accessed in profile.id (October 2018).

## Council

As shown in Table 4, above, Greater Bendigo has a higher percentage of total residents aged 55 and above than the state average. Policy actions will need to address the high prevalence of low-levels harms among older women, whom make up a significant proportion of the Greater Bendigo population.

This could include:

- Rethinking council-run social support activities or outings that might include visits to venues with EGMs. The Community Wellbeing Unit at the City plays an important role in building social connection and encouraging community participation amongst disadvantaged or vulnerable groups.
- Working with local organisations or support services to raise community awareness of all levels of gambling-related harm, as opposed to solely targeting problem gambling.
- Supporting community activities or initiatives that provide alternate leisure activities. An example of an initiative that provides an alternate to pokies is the Libraries After Dark<sup>15</sup> program that offers a safe, late-night alternative for people who might otherwise play EGMs. Council could explore opportunities for likeminded programs, or partner with local organisations to apply for grants or funding.

<sup>15</sup> (Public Libraries Victoria, 2018)

- Encouraging older residents or retirees to become involved in volunteering activities. Studies have found that the impact of gambling on community can be partially mitigated by activities such as volunteering<sup>16</sup>.

### 3.4 Community Benefits of Gambling

In Victoria, legislation requires clubs that run EGMs to submit annual community benefit statements that demonstrate at least 8.3% of EGM revenue has been provided back to the wider community. Clubs are then entitled to a tax concession<sup>17</sup>. As prescribed by the *Gambling Regulation Act 2003*, the State Government provides 8.3% of hotel gambling revenue to the Community Support Fund, which supports various projects throughout Victoria.

In Greater Bendigo, for every dollar lost to EGMs at local clubs in 2016/17, 4.6% was returned to the community in the form of donations, gifts and sponsorships, veterans support or volunteering expenses<sup>18</sup>. These are classified as 'class A' contributions and equate to \$963,850. During the same year, the State's average was 2.6%<sup>19</sup>. Other categories of community contributions include the venue's operating costs such as wages, insurance, refurbishments, equipment and financing costs.

In 2010, the Productivity Commission argued that despite clubs making community contributions, the claimed benefits on sporting activities and volunteering do not appear strong. It found that presence of gambling may adversely affect volunteering rates. It will be interesting to note whether this was raised during consultation for Greater Bendigo's Community Volunteering Strategy. The Commission also stated:

*The (gross) value of social contributions by clubs is likely to be significantly less than the support governments provide to clubs through tax and other concessions. Given this, there are strong grounds for the phased implementation of significantly lower levels of gaming revenue tax concessions for clubs, commensurate with the realised community benefit*<sup>20</sup>

Despite most club community contributions being reinvested into operations and capital works, EGMs operated at clubs remain preferential to those at hotels/pubs. Hotels tend to market and manage their

---

<sup>16</sup> (Office of Gaming and Racing, Department of Justice, 2011)

<sup>17</sup> Tax rate and threshold tables can be found at <https://www.justice.vic.gov.au/safer-communities/gambling/gaming-machine-entitlements>

<sup>18</sup> Alliance for Gambling Reform 2018, [http://www.pokiesplayyou.org.au/resources\\_data\\_research](http://www.pokiesplayyou.org.au/resources_data_research) accessed November 2018.

<sup>19</sup> Calculated from data found at [https://www.vcglr.vic.gov.au/sites/default/files/LGA\\_community\\_benefit\\_Summaries\\_2016\\_2017.pdf.pdf](https://www.vcglr.vic.gov.au/sites/default/files/LGA_community_benefit_Summaries_2016_2017.pdf.pdf) accessed in November 2018.

<sup>20</sup> Productivity Commission 2010, volume 1, section 6.2

EGMs to extract almost twice the amount per machine because they have a clearer profit motive. This is consistent in Greater Bendigo, where the top three venues with highest net expenditure per machine are hotels, and the bottom three are clubs (refer to Table 1 for more information). Clubs also tend to have more alternative recreation or leisure options and shorter opening hours.

## Council

As one of Australia's largest inland cities, Bendigo is in a unique position to be a regional leader in the campaign to reduce harm from gambling. Regarding future EGM applications, preference should be placed upon EGMs located at clubs as opposed to hotels. This is partially due to the existence of community contributions, but also because of the lower average net expenditure per EGM in clubs.

It is also important that the 50/50 hotel and club split be maintained. This is legislated by State government so in the case that State government policy is reviewed, Council could advocate against change.

The Alliance for Gambling Reform (the Alliance) is a collaboration of organisations that campaign for gambling industry reforms. As of September 2018, 18 Victorian Council are Alliance members. The Greater Bendigo Council can show support for the Alliance through:

- Signing up as an Alliance member,
- Keeping informed and showing support for their campaigns,
- Partnering with them to further promote and glean interest on Bendigo's local campaigns through their council action link on the website<sup>21</sup>.

Additionally, Council could support or advocate for the reallocation of community contributions to support Gambler's Help or other local services that are aimed at reducing gambling harm.

## 3.5 Gaming and gambling in children and adolescents

- Online game structural design is becoming increasingly complex and expensive and games are more monetised, socially integrated and immersive due to market forces.
- Profitability is influenced by in-app purchasing and accessibility is increased due to portability of smart phones and devices.
- 54% of Facebook games have been found to have gambling elements which tend to be owned by gambling operators.
- Overseas studies have found that video gaming problems appear to be a gateway behaviour to problematic gambling behaviour<sup>22</sup>.

---

<sup>21</sup> [http://www.pokiesplayyou.org.au/council\\_action](http://www.pokiesplayyou.org.au/council_action)

<sup>22</sup> (Molde, et al., 2018)

- There has been a push to create skills-based EGMs that determine payouts based on player ability as well as chance. This is to combat the ageing population of EGM players and to appeal to millennials. An application to have these machines installed at Crown Casino has been submitted to the VCGLR.

## Council

Despite regulatory control of many gambling forms being outside of Council's jurisdiction, Council still has a responsibility to monitor research, data and legislative or policy changes (actual or proposed) within the sector. Gambling questions could be included in community surveys or consultation to gather area specific information.

We know that gaming and sports betting are targeted towards young people and are very easily accessible. Council can aim to reduce the normalisation of gambling and sport by preventing gambling agencies from advertising on council owned or managed land. Activities or events involving young people should also not be held at venues that provide opportunities to gamble. Council can also advocate for regulatory changes to television and radio gambling advertisements.

Gambler's Help Bendigo have identified youth as a priority area within their community education program. Working together with Gambler's Help and gambling-related community organisations could identify other areas that Council can contribute towards increasing awareness of gambling-related harm in young people. This could be by including a piece in the Ambedo magazine or as a discussion point in the Youth Council.

### 3.6 Benefits of gambling

- Gambling is seen as an enjoyable pursuit for many Australians and is a large revenue source for state government. Gambling venues are often perceived by the community as friendly, accessible and secure<sup>23</sup>.
- Gambling venues (predominantly clubs) make significant social contributions although many of these benefit members and not the broader community.
- The industry generates economic activity, tax revenue and recreational benefits to players<sup>24</sup>.
- The gambling industry employs many people<sup>25</sup>.
- The risks of problem gambling are low for people who solely play lotteries and scratchies.

---

<sup>23</sup> (Productivity Commission, 2010)

<sup>24</sup> (Browne, et al., 2017)

<sup>25</sup> However, many gambling venue employees are highly employable and have transferrable skills. The gambling sector therefore does not create net employment benefits, but rather it diverts employment from one section of the economy to another (Productivity Commission 2010).

## Council

The Policy should focus on the wellbeing of the Greater Bendigo community. It is important to recognise that many forms of gambling are benign and many people who gamble do so without experiencing harm. However, particular forms of gambling can cause significant and systematic harm, which distinguishes them from many other recreational activities.

### 3.7 The impact of gambling on family, friends and the community

- Partners of problem gamblers in Australia have reported decrements to financial security, social activity, emotional and physical health and family interaction. These issues are accompanied by increased problems at work, personal debt and marital problems, as well as drug alcohol use<sup>26</sup>.
- Negative physical and mental health outcomes are reported by the children of problem gamblers, who may also experience neglect due to diminished parental care or lack of resources<sup>27</sup>.
- Financial insecurity associated with ongoing gambling by parents can affect more than one generation and can also extend to relatives, friends, and the wider community<sup>28</sup>.
- The children of people harmed by gambling have a much higher risk of developing gambling problems than the children of people who are not (between 7 to 14 times more likely)<sup>29</sup>.
- Research suggests that for every problem gambler, six others are negatively affected<sup>30</sup>. Figure 4, below, shows impact reported by family members to gambling support services.
- Despite the various findings regarding gambling-related harm and the families of people experiencing problem gambling, there is a dearth of information on how gambling problems impact on the health and wellbeing of family members.

---

<sup>26</sup> (Hing, et al., 2013)

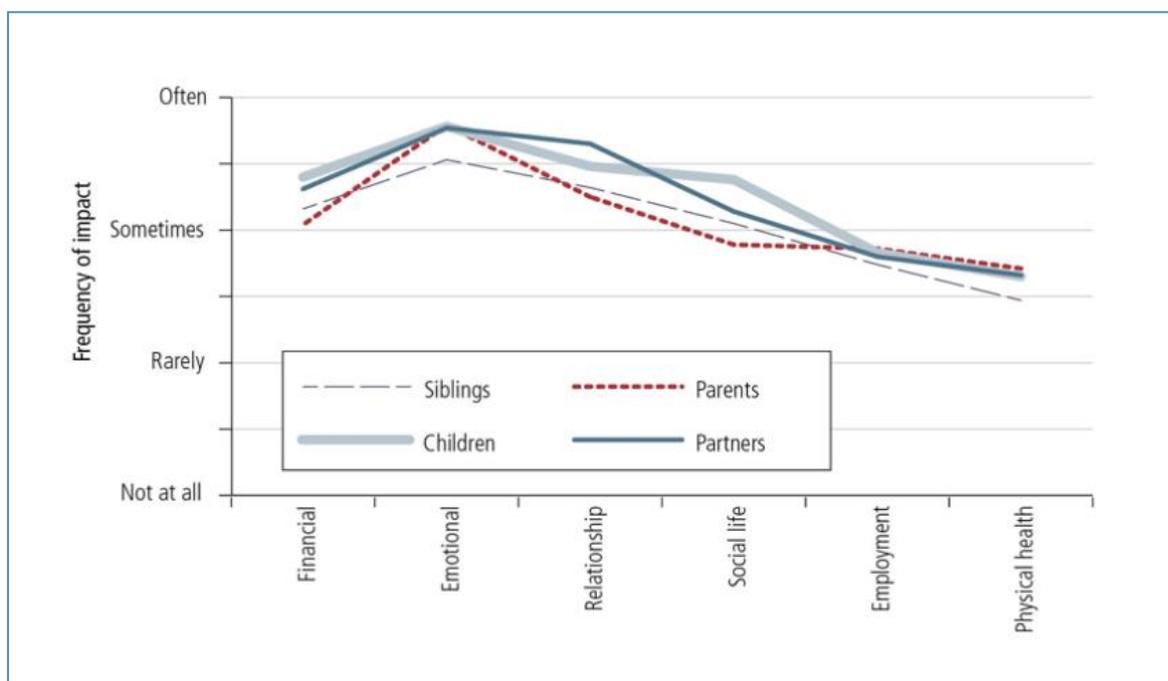
<sup>27</sup> (Goodwin, et al., 2017)

<sup>28</sup> (Goodwin, et al., 2017)

<sup>29</sup> (Dowling, 2014)

<sup>30</sup> (Goodwin, et al., 2017)

**Figure 6: Social impact reported by different family members in 2014**



Source: Dowling et al. (2014)

## Council

There has been significant research conducted on the gambling sector in recent years. However, there is still a need for further research that explores how family members are affected or harmed by gambling. Council can support this through the collection of local data. Incorporating gambling-related questions into community surveys or forums will allow Council to better understand the impacts on others in a local context. Having up-to-date, location specific information on community attitudes and experience of gambling-related harm can assist Council in its response to EGM applications. Knowledge sharing with local organisations or public health networks could also facilitate general health and wellbeing initiatives or community awareness programs aimed at reducing gambling-related harm.

Council can directly address the high emotional impact of gambling experienced by family members by reducing the community's exposure to gambling. Once again, emphasis is placed upon stricter regulation of gambling advertising at Council owned or operated venues, sporting grounds and events, as well as not holding Council activities at venues that operate EGMs, will reduce limit community exposure to gambling.

### 3.8 Gambling and the justice system

- Rates of problem gambling are much higher among people, including adolescents, in the criminal justice system<sup>31</sup>.

<sup>31</sup> (Miller, 2014)

- The uptake of gambling treatment services in prisons is very low (23%) compared to other treatment services (90%)<sup>32</sup>.
- Whilst it is increasing, there is a lack of awareness of gambling as an issue of significance across offending populations.
- There is consistent evidence of an established link between gambling problems and family violence<sup>33</sup>. Family violence is thought to be three times more likely in families that experience significant harm from gambling than in families where there is no gambling-related harm. There is no evidence to suggest that gambling is a causation of family violence, however there is thought to be a link between gambling and the increased severity and frequency of family violence.
- Areas with no EGMs have 30% fewer cases of domestic violence than those with 75 EGMs/10,000<sup>34</sup>

### Council

Anglicare Victoria Gambler's Help Bendigo provide a large amount of services to people who experience domestic violence and list the justice system as a key focus area for their community education work. Council can work more closely with Gambler's Help and support their work as part of its community safety or resilience agenda.

The review of *Accessible but not Convenient* stated that one of the challenges in implementing the policy framework was including data related to harm minimisation at a local level. There is a need to collect local data and to better understand the needs of the community. Council's relationship with Gambler's Help could be strengthened, with an emphasis on collaboration and information-sharing.

### 3.9 Low-risk and moderate-risk gambling

- Research shows most people who gamble consider themselves to be distinctly either in control of their gambling, or as having a gambling problem.
- Attitudes towards alcohol were not dissimilar in the past but now acknowledge the spectrum of alcohol-related harm outside of addiction.
- Several studies have found that moderate-risk gamblers are more likely to be aged between 18 to 24.
- Both low and moderate risk gamblers may be of lower socioeconomic status than other Victorians. They are also less likely to be tertiary educated and be employed as a professional<sup>35</sup>.
- Problematic behaviour, harm and other comorbidities increase as gambling risk increases.

---

<sup>32</sup> (Victorian Responsible Gambling Foundation, 2013)

<sup>33</sup> (Dowling, 2014)

<sup>34</sup> (Markham, et al., 2016)

<sup>35</sup> (Hare, 2009)

A public health approach to gambling conceptualises gambling as a continuum of harm – from no harm through to very severe levels. A background study This means that the focus of harm reduction activities and policy focus needs to be broadened to include low and moderate-risk gamblers<sup>36</sup>.

## Council

The VRGF aims to reduce the level of harm experienced by low and moderate risk gamblers through the implementation of various social marketing campaigns. Their approach for moderate-risk gamblers is to increase awareness on the early signs of gambling harm and connect the signs with harms they may already be experiencing. The approach for low-risk gamblers, as well as the general community, is by increasing community knowledge of ways to avoid gambling harm and practical methods of gambling responsibly.

The Policy can encourage low and moderate risk gamblers to recognise and change harmful behaviour by:

- Working with or supporting relevant organisations or agencies to educate the wider Greater Bendigo community on the overall negative impacts of gambling
- Reducing community exposure to gambling venues and advertising through changes in event planning and gambling promotion
- Raising awareness on gambling harm and behaviour and encouraging participation in non-gambling related activities
- Advocating for changes in bet reductions and cash withdrawal facilities at venues that operate EGMs, and by encouraging venues to operate in a safe and responsible manner.

## 3.10 Comorbidities

People who experience gambling problems commonly experience a range of health conditions such as mental illness, substance use disorder or other health conditions (for example, obesity or smoking-related illnesses). Most people who experience problem gambling have at least one comorbidity.

- Recent research on mental illness and problem gambling found that of people that experience problem gambling:
  - 52% reported having had depression in the previous 12 months
  - 46% reported having anxiety in the previous 12 months
  - 10% had bipolar disorder
  - 29% had antisocial personality disorder<sup>37</sup>
- It is estimated that half of gamblers that attend mental health services experience gambling-related harm.

---

<sup>36</sup> (Miller, 2017)

<sup>37</sup> (Miller, 2014)

- Patients that had a current diagnosis of drug abuse or dependence were more than four times as likely to be identified as a problem gambler on the PGSI<sup>38</sup>.
- The population is already marginalised, stigmatised and often experiences low social support, housing, domestic violence, and they may experience problems with mood regulation and impulsivity which can increase susceptibility to the harms from gambling<sup>39</sup>.
- More research is needed to understand the relationship.

## **Council**

Reducing harm from gambling is an action in Greater Bendigo's Health and Wellbeing Plan. This indicates that gambling is a local public health priority. A collective impact approach to reducing harm from gambling may be the most effective way of addressing gambling problems and its comorbidities. Collaboration and knowledge sharing between the health sector, community sector, local government and the criminal justice system can assist in reducing direct harms experienced by gamblers and may result in more efficient treatment of community members that present with a range of problems (including gambling).

---

<sup>38</sup> (Manning, 2018)

<sup>39</sup> (Manning, 2018)

## 4. Opportunities for Action

### 4.1 Key Summary

The previous chapter has highlighted some key issues that Council can focus on in order to effectively reduce or prevent the amount of gambling-related harm experienced by the Greater Bendigo community.

The suggestions listed in each category can broadly fit into four categories, which will become the priority areas of the new policy. The categories are:

- Leadership and collaboration – Council and City staff will lead by example. They will work with gambling networks, other levels of government, the health sector and local organisations or groups on a common agenda
- Advocacy – Council will be advocates and support the advocacy efforts of others to mitigate the negative impacts of gambling
- Regulation – Council will take a clear stance in EGM applications and in the regulation of existing EGMS
- Informed – Council will continue to keep abreast of information and communication regarding the gambling sector. Council will also inform the Greater Bendigo community of any news or decisions regarding EGMs within the municipality.

### 4.2 Additional points to consider for the *Reducing Harm from Gambling Policy*

The VLGA states that Councils can be very effective in advocating for their local communities, and that if Councils want to advocate strongly for change, they should reflect this in their gambling policies. The VLGA recommend that following be taken into consideration prior to, and during, policy development:

- Ensure activities are consistent with a public health approach recommended by the Public Health Association of Australia
- Work in partnership with other councils and relevant stakeholder groups
- Use the best available data, evidence and research
- Join the Alliance for Gambling reform.

According to the VLGA, local governments should focus most council resources where they have the greatest influence. Councils have a statutory responsibility to respond to planning permit applications

for EGMs, in addition to a role in licensing processes with the VCGLR. This is therefore an area that many Victorian local government gambling policies have focused upon.

It is recommended the Policy outlines Council's clear stance on EGMs, and how Council will respond to EGM applications (background information on Council's role in EGM application can be found in Appendix Two). The following section provides background and information on EGM applications and sheds lights on areas in which the Policy could be strengthened to further guide Council's actions.

Some additional points for consideration during the development of the Policy are listed below. These have been separated accordingly to Policy priority areas.

### **Leadership and collaboration**

- Due to the limited role Council has in regulating gambling platforms outside of EGMs, advocacy efforts will need to be focused to other levels of government.
- Council needs to be involved in the discussion with fellow LGAs – gambling discussion and debate is evolving rapidly, and it's important that Bendigo is included in the conversation. Examples include the regular Local Government Working Group on Gambling (LGGWG) run by the VLGA and regular updates disseminated online by the Foundation.
- Have a focus on improving inter-sectoral collaboration to ensure there is integrated response.
- Improve joint planning with State government

### **Advocacy**

- Advocacy for reforms to the industry in Victoria should include a reduction in bet limits (decrease to \$1 per spin), the reduction of access to funds through the removal of ATMs and large note acceptors at venues, limiting jackpots and bonus features on EGMs, a ban on political donations, lower municipal limits, and safer EGM design.
- Council can advocate to higher levels of government regarding meetings, activities and events being held at venues that operate EGMs.

### **Regulation**

- Examine land ownership and Council's responsibility – does Council currently support clubs, organisations or grounds that operate EGMs or who are sponsored by the gambling industry?
- Determine whether Council will respond to EGM applications on a case-by-case basis or whether it will have zero-tolerance (refer to Appendix Four for a review of leading existing gambling policies).

### **Inform**

- Consultation and engagement with the gambling industry is necessary. The example of tobacco is a successful model for change.
- In a general survey conducted by the Foundation, 81% of people surveyed suggested that they gamble for pleasure or entertainment purposes, 66% said they wanted to win money, 49% wanted to socialise with friends and 40% wanted to challenge their skills and beat the odds.

These are state-wide results but indicate that awareness raising on the ways in which gambling is not a good way to win money is necessary – the odds are against them<sup>40</sup>.

- Low levels of people seeking help for gambling-related problems indicate there is stigma involved – clear communication and information sharing with community can help address this and promote the message that support is available and effective

---

<sup>40</sup> <http://www.insidegambling.com.au/editions/2/feature/regular-gamblers-tell-us-what-they-really-think>

## References

- Armstrong, A. & Carroll, M., 2017. *Gambling activity in Australia*, Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Armstrong, A., Thomas, A. & Abbott, M., 2017. Gambling participation, expenditure and risk of harm in Australia, 1997-1998 and 2010-2011. *Journal of Gambling Studies*.
- Browne, M. et al., 2017. *The social cost of gambling to Victoria*, Melbourne: Victorian Responsible Gambling Foundation.
- Browne, M. et al., 2016. *Assessing gambling-related harm in Victoria: a public health perspective*, Melbourne: Victorian Responsible Gambling.
- Dowling, N., 2014. *The impacts of gambling on families*, s.l.: Australian Gambling Research Centre.
- Dowling, N., Suomi, A., Jackson, A. & Lavis, T., 2014. *Coping strategies employed by the family members of problem gamblers*, s.l.: s.n.
- Goodwin, B., Browne, M., Rockloff, M. & Rose, J., 2017. A typical problem gambler affects six others. *International Gambling Studies*, 17(2), pp. 276-289.
- Hare, S., 2009. *A study of gambling in Victoria: Problem gambling from a public health perspective*, Melbourne: Department of Justice.
- Hing, N., Tiyce, M. & Nuske, E., 2013. All in the family: Help-seeking by significant others of problem gamblers. *International Journal of Mental Health and Addiction*, Volume 11, pp. 396-408.
- Livingstone, C. & Conroy, S., 2018. *Does Australia have a gambling problem?* [Interview] (5 March 2018).
- Livingstone, C. & Francis, L., 2014. *What is the evidence to support reduction of maximum bets on electronic gambling machines? Discussion of the current arrangements for community benefit statements by Victorian club gambling venues. Report to Municipal Association of Victoria.*, Melbourne: Monash University.
- Manning, V., 2018. *Panel discussion: Where's the harm in gambling? Exploring Gambling Comorbidities* [Interview] (October 2018).
- Markham, F., Doran, B. & Young, M., 2016. The relationship between electronic gaming machine accessibility and police-recorded domestic violence: A spatio-temporal analysis of 654 postcodes in Victoria, Australia, 2005-2014. *Social Science and Medicine*, Volume 162, pp. 106-114.
- Miller, H., 2014. *Complex Lives: co-occurring conditions of problem gambling*, Melbourne: Victorian Responsible Gambling Foundation.
- Miller, H., 2017. *Hidden harm: Low-risk and moderate-risk gambling*, Melbourne: Victorian Responsible Gambling Foundation.
- Molde, H. et al., 2018. Are Video Games a Gateway to Gambling? A Longitudinal Study Based on a Representative Norwegian Sample. *Journal of Gambling Studies*, pp. 1-13.
- Office of Gaming and Racing, Department of Justice, 2011. *Socio-economic impacts of access to electronic gaming machines in Victoria: effects and demands on communities*, s.l.: s.n.
- Productivity Commission, 2010. *Gambling*, Canberra: s.n.

Public Libraries Victoria, 2018. *Libraries After Dark*. [Online]  
Available at: <https://www.publiclibrariesvictoria.net.au/copy-of-shared-leadership-reports>  
[Accessed 18 October 2018].

Queensland Government Statistician's Office, 2018. *Australian Gambling Statistics*, s.l.: Queensland Treasury.

Victorian Responsible Gambling Foundation, 2013. *Gambling and the criminal justice system*, Melbourne: Victorian Responsible Gambling Foundation.

## Appendices

### Appendix One: Index of relative socio-economic disadvantage

City of Greater Bendigo's small areas and benchmark areas		
Area	2016 index	Percentile
Strathfieldsaye	1083.8	92
Rural East	1081.9	92
Maiden Gully	1074.3	89
Marong - Rural West	1041.3	71
Huntly	1031.8	65
Epsom - Ascot	1021.8	58
Greater Melbourne	1021.0	57
Rural Bendigo	1020.6	57
Strathdale	1019.0	56
Victoria	1010.0	51
Australia	1001.9	46
Study area – Kamarooka, Hunter and Drummartin	995.0	42
Bendigo SA4	993.2	41
Flora Hill - Quarry Hill - Spring Gully - Golden Gully	989.9	39
Kennington	981.6	35
Elmore - Rural North	981.2	35
City of Greater Bendigo	981.0	34
Regional VIC	977.0	32
Bendigo	974.6	31
Urban Bendigo	972.0	30
East Bendigo	968.8	28
Golden Square	968.3	28
White Hills - Jackass Flat	959.5	25
Kangaroo Flat - Big Hill	934.0	17
Heathcote and District	925.6	15
Eaglehawk - Eaglehawk North - Sailors Gully	919.8	13
North Bendigo - California Gully	884.9	8
Long Gully - West Bendigo - Ironbark	855.2	6

Source: profile.id (2018) from ABS data (2018)

Note: In the **2016 index** column, a higher index means there are lower levels of disadvantage. For example, an index of 855.2 means that the area is significantly disadvantaged. The **Percentile** column indicates the approximate position in a list of Australian localities. A higher number means higher socio-economic status. For example, a percentile of 6 means that 6% of Australia's suburbs are more disadvantaged than the Long Gully area.

## Appendix Two: Background information on EGMs and the Council's role in the application process

In Victoria, the VCGLR is authorised to regulate gambling in Crown Casino, clubs, and hotels, in addition to sports betting and wagering. Gambling businesses or activities require the VCGLR's permission to operate within Victoria. The total number of gaming machines permitted in Victoria is 30,000. Of these, 2,628 are allocated to Crown Casino, with half of the remaining 27,372 allocated to clubs, and the remainder allocated to hotels<sup>41</sup>.

Under the Gambling Regulation Act 2003, when an application to increase the number of EGMs or for a new gaming premise is lodged with the VCGLR, the applicant must notify the relevant local government.

The Council then has the option of preparing a social and economic impact assessment submission in response to the VCGLR application. For each application the Council must decide whether it supports the application, as well as whether the net social and economic impact of the application on the municipal district and the community's wellbeing is beneficial, neutral or detrimental.

In addition to a VCGLR application, the applicant is required to lodge a planning permit application with the City if the application intends to:

- Increase the number of gaming machines at an approved venue; or
- Operate gaming machines at a new venue.

In relation to the EGMS application process, gambling policy therefore informs Council decision-making in relation to two related regulatory processes:

- notifications from the VCGLR of applications under the *Gambling Regulation Act 2003* for new venues or increasing numbers of EGMs within existing venues in Greater Bendigo; and
- Planning Permit applications to install or use a gaming machine or use land for the purpose of gaming enabled by the *Planning and Environment Act 1987*.

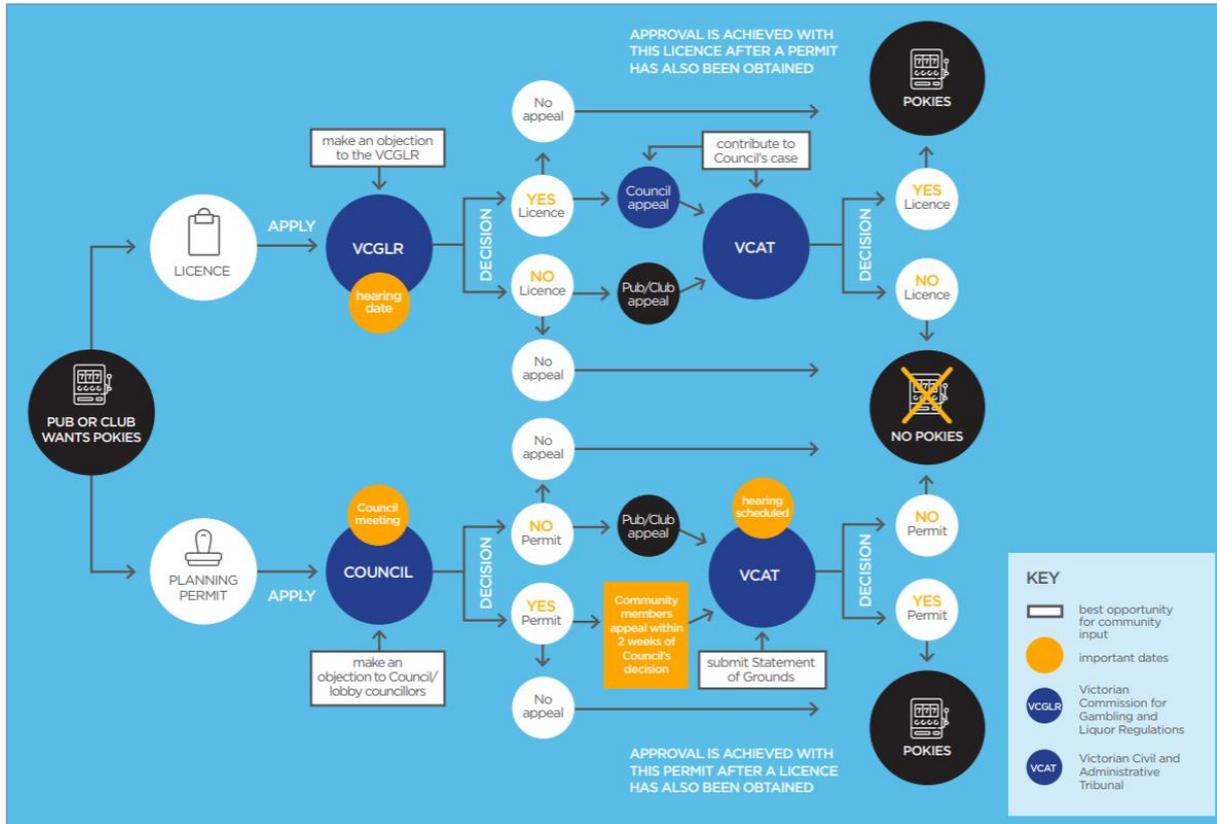
All VCGLR decisions on gaming license applications are open to review by the Victorian Civil and Administrative (VCAT), as is the case for Council decisions on planning applications.

All clubs and hotels must apply for both an EGM licence and a planning permit. Figure Five, below, outlines the process in which these are obtained.

---

<sup>41</sup> <https://www.vcglr.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/caps-and-limits>

Figure 5: The EGM application and approvals process



Source: VGLA (2017)

Appendix Three: EGM data for Greater Bendigo and neighbouring councils compared to the state average

Council	EGM expenditure per day 2017–18	SEGM expenditure per year 2017–18	Number of EGM venues as at 31 Dec 2017	Ranking by socio-economic disadvantage 2016	Ranking by EGM expenditure 2017–18	Pokies per 1000 adults 2017–18	Number of EGMs at 31 Dec 2017	Municipal limit	% of municipal limit used	Expenditure per adult 2017–18
Greater Bendigo	\$135,165	\$49,335,224	10	31	25	6.8	602	870	69	\$556
Mount Alexander Shire	\$7,952	\$2,902,516	1	42	61	1.9	30	156	19	\$182
Loddon Shire	\$0	\$0	0	9	N/A	0.0	0	61	0	\$0
Mitchell Shire	\$51,429	\$18,771,635	5	47	39	7.0	228	299	76	\$574
Strathbogie Shire	\$3,324	\$1,213,123	1	26	69	3.7	32	85	38	\$140
Campaspe Shire	\$22,645	\$8,265,373	4	23	48	7.1	209	293	71	\$281
Ballarat	\$152,778	\$55,763,965	15	29	22	7.9	657	663	99	\$675
Boroondara	\$55,687	\$20,325,757	4	78	37	1.1	162	1331	12	\$142
Greater Dandenong	\$332,658	\$121,420,073	15	2	3	7.3	958	989*	97*	\$927
Victoria	\$77,398	\$28,250,131	10				469			

Source: VRGF, VCGLR, ABS, Queensland Government Statistician's Office, September 2018

\* Note that Dandenong has a regional cap rather than a municipal limit

Appendix Four: A review of some key gambling polices from across Victoria

Council	Title	Year	Review date	No of pages	Position/Vision/Aim	Sections	Policy strengths	Policy weaknesses	Priority areas	Number of actions	Learnings for Bendigo's Policy
City of Monash	City of Monash Public Approach to Gambling Policy Statement	2016 - 2020	2016	29	To seek reform to the Gambling Regulation Act to place greater regulation and restrictions on the gambling industry, gambling environments and gambling machines which are designed to mislead and profit from individuals.  Our position specifically advocates against the targeted concentration of poker machine in Victoria's most vulnerable and disadvantage communities.	<ul style="list-style-type: none"> <li>Mayor's message</li> <li>Introduction</li> <li>Why focus on poker machines?</li> <li>Gambling: a public health priority                             <ol style="list-style-type: none"> <li>a public health priority</li> <li>Council's public health role</li> <li>'Responsible gambling' - Council's position</li> </ol> </li> <li>Purpose of policy statement</li> <li>The facts and stats: Australia, Victoria and Monash</li> <li>Australia's Regulatory Environment                             <ol style="list-style-type: none"> <li>Poker machine licensing</li> <li>Community benefit</li> <li>State Government benefit and 'responsible gambling'</li> </ol> </li> <li>Timeline of Monash Council Leadership - major highlights</li> <li>Policy Statement</li> <li>Application of policy statement</li> <li>Appendices</li> <li>Selected relevant website and research</li> <li>Reference list</li> </ul>	<ul style="list-style-type: none"> <li>States where it sits within broader council plans and docs</li> <li>Strongly worded, position clear</li> <li>Includes "application of policy statement" section</li> </ul>	<ul style="list-style-type: none"> <li>Wordy, very long – parts could be moved to background report</li> </ul>	<p>9 policy priorities that are to be applied to all relevant Council activity and decision-making with whole of Council ownership</p> <ul style="list-style-type: none"> <li>Electronic gaming machines (EGMs) - poker machines - in Monash</li> <li>Gambling as a public health priority</li> <li>Political Leadership and Policy</li> <li>the use of council resources and facilities for gambling purposes</li> <li>gambling-free community activity</li> <li>community consultation</li> <li>Partnerships</li> <li>Funding</li> <li>Research, monitoring and evaluation</li> </ul>	9 areas - 60 actions	<ul style="list-style-type: none"> <li>Keep background, stats etc in one section then get straight to the point of policy statement and application</li> <li>"The Policy Statement has a specific focus on EGM's due to Council's decision making role in planning permits under the Monash Planning Scheme - and the opportunity for Council to participate in - and choose to make objections to applications under the Gambling Regulation Act 2003" pg. 5</li> <li>Include statement re. Council having no direct legislative influence on online gambling but can support actions which seek to place greater regulation on online gambling etc</li> <li>Link to Policy to Community Plan and strategic objectives in H+W plan</li> </ul>
City of Casey	Electronic Gaming Machines Strategy 2015 - 2020	2015		29	To articulate Council's position on gaming within the municipality. <i>The Strategy</i> aims to provide a balanced assessment of how Council considers current and new EGMs to the municipality. Also assists council to advocate on behalf of residents on matters related to the h+w of community.	<ol style="list-style-type: none"> <li>Purpose</li> <li>Definitions</li> <li>Acronyms</li> <li>Scope</li> <li>Exec Summary</li> <li>Gambling and EGMs in City of Casey</li> <li>CoC position on EGMS (subheadings)</li> <li>Policy, Legislative and Regulatory Frameworks (subheadings)</li> <li>Methodology (subheadings)</li> <li>Consultation (subheadings)</li> <li>Administrative Updates</li> <li>Review</li> <li>Appendices (subheadings)</li> </ol>	<ul style="list-style-type: none"> <li>Methodology diagram useful to outline review and policy development (perhaps in SIA)</li> </ul>	<ul style="list-style-type: none"> <li>It's a strategy not a policy</li> <li>EGM focus</li> <li>Action wording can be vague and could be interpreted in various ways</li> </ul>	<ul style="list-style-type: none"> <li>Advocacy and Partnerships</li> <li>Local Economy</li> <li>Consultation and Information Provision</li> <li>Community Wellbeing</li> <li>Planning Assessment</li> <li>Policy, Legislative and Regulatory Frameworks</li> </ul>	6 areas - 43 points that contribute to Casey's position on EGMs	<ul style="list-style-type: none"> <li>Good section on context and policy, legislation and regulation regarding EGMs</li> <li>Inclusion of most recent statistics and data is useful in appendices</li> </ul>
City of Greater Dandenong	DRAFT Gambling Policy	unknown	Currently in review	5	The Policy forms a framework to guide Council's advocacy and community engagement in relation to gambling, as well as its response to applications for electronic gambling machines (EGMs) or venues within and near the Council.	<ul style="list-style-type: none"> <li>Purpose</li> <li>Background</li> <li>Scope</li> <li>Council Policy</li> </ul>	<ul style="list-style-type: none"> <li>Very concise and easy to read</li> <li>Includes "Scope of policy" and what it is to be used for (i.e. planning submissions, engagement, advocacy work, education etc)</li> </ul>	<ul style="list-style-type: none"> <li>Interesting points but perhaps too brief (still in draft form) and there could be more said about the public health approach and link to other projects, plans etc.</li> </ul>	<p>Priority areas:</p> <ul style="list-style-type: none"> <li>Advocacy</li> <li>Research and Monitoring Gambling Trends</li> <li>Community Consultation, Support and Education</li> <li>Council's relationship with the gambling industry</li> <li>EGM Applications                             <ol style="list-style-type: none"> <li>Relevant factors in considering EGM applications</li> <li>Response to EGM Applications</li> </ol> </li> </ul>	4 areas - 17 actions (plus area and actions in section regarding EGM applications)	<ul style="list-style-type: none"> <li>Take a lot of the unnecessary preamble out of the policy and include in the issues and opportunities paper or SIA</li> <li>Statistics in background - can be an infographic</li> <li>Include policy point regarding council owned land, sporting grounds and advertising etc.</li> </ul>

Council	Title	Year	Review date	No of pages	Position/Vision/Aim	Sections	Policy strengths	Policy weaknesses	Priority areas	Number of actions	Learnings for Bendigo's Policy
<b>Brimbank City Council</b>	Brimbank Electronic Gambling Policy 2015	2015	Currently under review	4	Policy aims to: <ul style="list-style-type: none"> <li>Minimise the detrimental social and economic impacts of EGMs and other forms of electric gambling,</li> <li>Support public health and the wellbeing of the Brimbank community</li> </ul>	<ul style="list-style-type: none"> <li>Policy aim and objectives</li> <li>Definition of terms being used</li> <li>Policy statement and principles</li> <li>Specific requirements</li> <li>Related Council Policy</li> </ul>	<ul style="list-style-type: none"> <li>Policy objectives are good - it states what it is and what council's objective for the area is, and how council will achieve this objective</li> <li>Link to Council indirectly providing access to other forms of gambling: "Prohibit access to online gambling at all Council provided, supported or sponsored internet access points" (pg 4).</li> </ul>	<ul style="list-style-type: none"> <li>Wordy</li> <li>No mention of Council activity and gambling venues, council owned land etc</li> </ul>	<p>Principles that underpin Council's position on electronic gambling:</p> <ul style="list-style-type: none"> <li><b>Represent:</b> The interests of the community</li> <li><b>Collaborate:</b> work together with broader community to address impacts</li> <li><b>Equity:</b> vulnerable communities need extra support</li> <li><b>Robust evidence:</b> decisions based on evidence and community responses</li> <li><b>Inform:</b> community understand impacts of gambling and emerging trends</li> <li><b>Minimise harm:</b> prevention and early intervention strategies to reduce impact</li> </ul> <p>Council will act in the following to achieve aims and objectives:</p> <ul style="list-style-type: none"> <li>Plan</li> <li>Lead</li> <li>Partner</li> <li>Advocate</li> </ul>	4 areas - 19 actions	<ul style="list-style-type: none"> <li>Maintain consistency by linking back to H+W and Community Plans. This policy is very brief but can be harder to follow because of the various aims and objectives and key roles etc. Keep Policy simple.</li> <li>Include an M+E section. How will the policy be monitored and how regularly? What is the expected review date?</li> </ul>
<b>Yarra City Council</b>	Gambling Policy 2017	2017	unknown	21	To advocate for a fairer society where the gambling industry no longer causes social and economic harm in the community of Yarra	<p>Glossary</p> <ol style="list-style-type: none"> <li>Executive Summary</li> <li>Preamble</li> <li>Background <ol style="list-style-type: none"> <li>Understanding the social costs of gambling</li> <li>Changes in gambling platforms</li> <li>Expenditure on poker machines in Yarra</li> <li>Council actions to addressing gambling harm</li> <li>Yarra Gambling Strategy: A Community Wellbeing Approach <ol style="list-style-type: none"> <li>To enhance Council's regulatory role <ol style="list-style-type: none"> <li>To support informed choice</li> <li>To seek collaborative partnerships</li> <li>To foster social inclusion</li> <li>To develop clear advocacy positions</li> </ol> </li> </ol> </li> </ol> </li> <li>Policy 2017 <ol style="list-style-type: none"> <li>Policy Goals</li> </ol> </li> </ol> <p>Endnotes</p>	<ul style="list-style-type: none"> <li>Well written and easy to follow, good use of figures</li> <li>Rationale included in policy section - perhaps this could go into the I+O paper or accompanying report</li> </ul>	<ul style="list-style-type: none"> <li>Reads more like a background report or SIA – policy section is quite brief (not necessarily a bad thing)</li> <li>Interesting inclusion of rationale for policy points</li> </ul>	<p>Main goals (as listed in Mayor's foreword):</p> <ol style="list-style-type: none"> <li>Advocacy to reduce the number of poker machines in Yarra</li> <li>Support for gambling-free activities</li> <li>Improvement in community understanding about the risks posed to the community and the individual by the gambling industry</li> <li>Reform of the gambling industry</li> <li>Community participation in planning decisions concerning gambling activities</li> </ol>	5 areas - 16 actions	<ul style="list-style-type: none"> <li>Good use of sections and figures</li> <li>Because the policy is being developed semi-externally, rationale is a good idea - could be included in the SIA/report</li> </ul>
<b>City of Darebin</b>	<b>DRAFT</b> Darebin Electronic Gambling Machine Policy	2018 - 2022	Currently in review	17 + appendices	To make the City of Darebin free of poker machines (Electronic Gambling Machines).	<ol style="list-style-type: none"> <li>Policy Objective</li> <li>Policy Statements</li> <li>Policy Scope</li> <li>Public Policy Context</li> <li>Legislative and Regulatory Reforms Sought by Darebin Council (Summary)</li> <li>Northern Region Context and Comparison</li> <li>City of Darebin Context</li> <li>Targeting disadvantaged neighbourhoods</li> <li>Prevalence of severe EGM gambling-related problems in Darebin</li> <li>Pubs vs Clubs</li> <li>Problem gamblers</li> <li>Darebin Electronic Gambling Machine Policy: Strategic Framework</li> <li>Darebin Electronic Gambling Machine Policy: Action Plan</li> </ol>	<ul style="list-style-type: none"> <li>Very clearly states objectives and stance</li> <li>Good layout, succinct</li> <li>Actions are directive and clear, and identify actions with public health stance</li> </ul>	<ul style="list-style-type: none"> <li>Only really addresses EGMs</li> <li>One-sided – it opposes all applications and existing EGMs, so this may not stand up at VCGLR or VCAT</li> </ul>	<ul style="list-style-type: none"> <li><b>Regulation and Legislation</b> To exercise the full extent of Council's regulatory and legislative mandate to minimise harm from EGMs</li> <li><b>Advocacy</b> Council will continue to be recognised as a statewide leader in driving changes to reform those systems and structures that cause gambling-related harm to the Darebin community</li> <li><b>Organisational alignment</b> Council will take a whole of Council approach to minimising harm, acknowledging that all our activities can contribute to minimising harm</li> <li><b>Research, Monitoring Data</b> To develop a strong, robust and defensible evidence base that will enhance Council's capacity to effectively influence the location, management and operation of EGMs in the municipality and contribute to broader advocacy.</li> </ul>	4 strategies - 46 actions	<ul style="list-style-type: none"> <li>Very strongly advocacy focused and is clear on where efforts will be focused</li> <li>Example of a very hard-lined and zero tolerance approach</li> <li>Included a pubs versus clubs section</li> <li>Strategic framework included</li> <li>Policy itself clear and includes organising structure of strategies, commitments and actions</li> <li>Good background section and break down of the applications process, legislation etc</li> </ul>

Council	Title	Year	Review date	No of pages	Position/Vision/Aim	Sections	Policy strengths	Policy weaknesses	Priority areas	Number of actions	Learnings for Bendigo's Policy
City of Maroondah	Maroondah Gambling Policy	2018	2022	18	<p>The Policy's objectives are to:</p> <ul style="list-style-type: none"> <li>• Transparently articulate Council's position on gambling and gaming to the gambling industry, service providers, other local governments and the community</li> <li>• Provide clarity and consistency in relation to Council's commitments and approach to preventing gambling-related harms in the municipality</li> <li>• Ensure that Council's actions and initiatives align with the contemporary statutory, strategic and decision-making framework within which gambling takes place in the municipality</li> <li>• Effectively and efficiently respond to emerging gambling patterns, behaviours and impacts</li> <li>• Demonstrate Council's commitment to protecting those most at risk of gambling-related harms through its various statutory roles and responsibilities</li> <li>• Strengthen Council's capacity to effectively guide the location and operation of electronic gaming machines (EGMs) by providing the framework for the review of the Maroondah Planning Scheme</li> <li>• Effectively engage with stakeholders and the community when fulfilling its statutory roles.</li> </ul>	<ul style="list-style-type: none"> <li>• What is the purpose of this policy?</li> <li>• How was this policy prepared?</li> <li>• What are we seeking to achieve through this policy?</li> <li>• How does this Policy align with the statutory and strategic framework?</li> <li>• What is the City of Maroondah's gambling context?</li> <li>• What is gambling-related harm?</li> <li>• What is our role in preventing and minimising gambling-related harms?</li> <li>• What is our strategic response?</li> <li>• References</li> </ul>	<ul style="list-style-type: none"> <li>• Policy framework good</li> <li>• Clear and succinct, easy to follow</li> <li>• Policy commitments and context included</li> </ul>	<ul style="list-style-type: none"> <li>• Long preamble - could go into background report</li> </ul>	<ul style="list-style-type: none"> <li>• Partnerships</li> <li>• Advocacy</li> <li>• Planning, regulation and enforcement</li> </ul>	3 areas - 18 activities	<ul style="list-style-type: none"> <li>• Layout, diagrams and included sections</li> <li>• 'Background' section includes a comparison to neighbouring LGAs</li> </ul>

Appendix Five: Council survey on gambling policy development (conducted by the VLGA in May 2018)

Council	Link to policy	Policy strengths	Policy weaknesses	Review process	Community engagement details	Engagement with gambling venues	Community reference group used?	Recommendation for a skilled facilitator	Any other information?
Moonee Valley City Council	<p>Planning related policy: Amendment C140  <a href="http://www.mvcc.vic.gov.au/en/Planning-And-Building/Long-Term-Planning-In-Moonee-Valley/Planning-Scheme-Amendment/Amendment-C140-Gaming-Policy">http://www.mvcc.vic.gov.au/en/Planning-And-Building/Long-Term-Planning-In-Moonee-Valley/Planning-Scheme-Amendment/Amendment-C140-Gaming-Policy</a></p> <p>Moonee Valley's Health and Wellbeing Plan also includes very minor actions around addressing gambling harm:  <a href="http://www.mvcc.vic.gov.au/About-the-Council/Community-health-and-wellbeing/Health-and-wellbeing-planning.aspx">http://www.mvcc.vic.gov.au/About-the-Council/Community-health-and-wellbeing/Health-and-wellbeing-planning.aspx</a></p>	Strong land use policy - however, we are currently are at our cap so unlikely to have applications for additional machines. Integrating actions in the health and wellbeing policy allow for a health promotion approach and encourages a whole-of-Council approach to addressing harm.	We don't have a standalone social policy which limits our ability to direct activities/actions from across Council	The C140 amendment was the first of its kind and therefore we employed a consultant (Robert Milner) to review existing policies, undertake a venue scan/analysis along with precinct analysis and develop the policy	Though existing avenues, community members and stakeholders were engaged (e.g. health and wellbeing committee, neighbourhood houses, etc)	All gambling venues were notified of the C140 amendment. No venues made submissions to this process. We didn't feel it was appropriate to undertake any further engagement with them as the policy is about any additional machines	No	No	No
City of Monash	<p><a href="https://www.monash.vic.gov.au/files/assets/public/about-us/council/organisation/advocacy/monash-public-health-approach-to-gambling-policy-statement-2016-2020.pdf">https://www.monash.vic.gov.au/files/assets/public/about-us/council/organisation/advocacy/monash-public-health-approach-to-gambling-policy-statement-2016-2020.pdf</a></p>	Strong on our position, consistent with our advocacy effort, aligned with all other aspects of council policy that could be impacted	Needs to be further extended with protocol to cover other forms of gambling, lotto, sweeps, footy tipping etc	Will be reviewing in 2020	<p>The draft City of Monash Public Health Approach to Gambling Policy Statement was released for public comment from 1 April – 28 April 2016. Council received 42 submissions, with overwhelming support for Council's strong stance in relation to:</p> <ul style="list-style-type: none"> <li>■ Strengthening the community resilience to Gambling related harm</li> <li>■ Advocacy; and</li> <li>■ Leadership</li> </ul> <p>A number of submissions received by Council were heartfelt and courageous stories highlighting the real impact of the gambling industry on the Monash community.</p>	This has been flagged as something to think about moving forward for the policy review. Very keen to hear other LG experiences. This would more likely occur with RSL's than other venues.	No	No	No
Brimbank City Council	<p>Brimbank Electronic Gambling Policy  <a href="https://www.brimbank.vic.gov.au/plans-policies-and-strategies/policies/electronic-gambling-policy">https://www.brimbank.vic.gov.au/plans-policies-and-strategies/policies/electronic-gambling-policy</a></p> <p>This policy is currently under review. The draft revised policy is due to go to Council to be approved for public consultation in June.</p>	Does not use language such as responsible gambling. Has a health and wellbeing focus	Is not strong on preventing council asset being used to support gambling. Needs a stronger position around council not engaging with the gambling industry e.g. no events or programs to be run at gambling venues.	To develop the draft, we have completed a review of literature and other council policies. We have also held a workshop with Councillors where we had several experts present to them. VRGF, AGR and Deakin	<p>Community engagement will take place during the public exhibition of the draft policy.</p> <p>This will include:</p> <ul style="list-style-type: none"> <li>- An online survey</li> <li>- Workshops</li> </ul> <p>Copies of the draft Policy will be made available on the website and at all council venues including libraries and neighbourhood houses.</p>	Venues will also be consulted during the public exhibition period via a workshop. We will invite all pubs and clubs with or without EGMs. This is very important for us as we are pushing to have a policy that requires EGMs on council land to be removed. We are also proposing that Clubs using council land should not receive resourcing of any form from the Gambling industry, e.g. sponsorship from EGM venues or online gambling orgs. In our initial conversations with some of the effected clubs we agreed to consult with them during the policy review.	No. The policy has been reviewed early in the cycle to clear up some ambiguity in the current policy. The timelines have been very tight so when have not been able to set up this type of community reference group.	No	No

Council	Link to policy	Policy strengths	Policy weaknesses	Review process	Community engagement details	Engagement with gambling venues	Community reference group used?	Recommendation for a skilled facilitator	Any other information?
Wyndham City	Wyndham Gambling Harm Minimisation Policy and Action Plan The Policy is still in draft and it is planned for it to be adopted at the June OCM which will be held on 5 June. Can make the policy link available after that.	Moved away from Responsible Gambling to more of a public health approach - hence the name change to harm minimisation. An acknowledgement that work in this space is not about addressing problem gambling but beginning to minimise the exposure - first step in taking a prevention lens.	While it begins to address other forms of gambling, the focus is still on EGMs	The existing policy was out of date, therefore did not conduct a comprehensive review. A background paper into gambling harm was produced, looking at the current research and trends as well as an analysis of the local data, which then went on to make recommendations for the development of the policy and action plan	Community members were not formally engaged, but a community attitudes survey on EGMs and online/sports betting was conducted with over 300 responses - the results of this survey were used to also inform the policy and action plan.	Not really, they were made aware of the community survey and were sent a copy of the draft policy and action plan during the public exhibition period, no responses were received from the venues.	A Gambling Harm Reference Group was established and chaired by a councillor. TORs were developed and am happy to share the TORS and how selection was conducted and who the members of the panel were.	No but would be interested in who has done work in this space and how successful it has been.	Education of councillors on the move away from responsible gambling to harm minimisation. Some may find this concept hard to understand, as well some councillors may feel conflicted because of their associations with venues, especially the community/sports clubs.
City of Stonnington	Responsible Gambling Policy (2016) <a href="http://www.stonnington.vic.gov.au/Council/Council-Policies">http://www.stonnington.vic.gov.au/Council/Council-Policies</a>	Policy sets out the areas (precincts) where Council will actively challenge increases to gaming machines based on vulnerability	The Policy reflects statistics and venues at a point in time and therefore the data is outdated within a short period of time.	A consultant was engaged to review the changes that had occurred since the policy was developed in 2005. A background paper was developed, internal and external consultations undertaken, including a community survey through the Connect Stonnington Group before the updated Policy was presented to Council for adoption	Council's Connect Stonnington Group was surveyed to inform the policy content and meetings held with community organisations.	Engagement did not occur directly with gaming venues.	A community reference group was not established	Stonnington's consultant is no longer consulting	No
Moreland	<a href="http://www.moreland.vic.gov.au/globalassets/key-docs/policy-strategy-plan/gambling-in-moreland-2015---2020.doc">http://www.moreland.vic.gov.au/globalassets/key-docs/policy-strategy-plan/gambling-in-moreland-2015---2020.doc</a>	simplicity, advocacy focus	despite emphasis on "harm" there is still a hangover of previous era focus on "problem gambling" however	internal stakeholders - especially land use planners and focus groups with community agencies	Yes, and focus groups with community agencies. Advice, confirmation of direction, and potential to act as partners in delivery	Apart from being invited as all residents/orgs - no special efforts were made to seek out venues	No	No	Be bold!
Darebin City Council	Darebin Electronic Gambling Machine Policy 2018 – 2022 (Draft).	1. Clear unambiguous objectives and clarity of council's aspirations. 2. Clear basis for advocacy effort and invest. 3. The policy framework has been underpinned by an integrated set of the principles of Equity, Wellbeing and Human Rights and highlights that areas of disadvantage bear the greatest harms from gambling both in the short term and cumulatively. 4. The action plan identifies specific actions to address the range of specific health, equity and human rights issues generated by gambling.	The clear 'zero tolerance' stance suggested by the draft policy could be easily attacked in VCGLR and VCAT if defending appeals.	1. Review current data. 2. Seek advice from Gambling Foundation website. 3. Alignment with AGR data, research, and advocacy objectives. 4. Included specific local objectives identified by Council (eg To assist all Darebin Clubs divest themselves on their reliance on EGM's and EGM revenue). 5. Include latest research such as family violence data, gambling prevalence in young people etc. 6. Consultation with local government partners in the Northern Region.	As a first step, engagement occurred with local community and welfare agencies and gambler's help to ensure that service data and information directly informed policy and action plan. An initial survey of all clubs and agencies in receipt of Council subsidies to gauge level of EGM dependence. Feedback was sought from Council's various advisory committees and community networks to ensure that any current and emerging issues are captured in the policy.	Council unsuccessfully to create an EGM industry' working group to inform the policy. 9 hotels and 3 clubs were invited to participate. Only one club responded. A copy of the draft policy was then sent to all hotels, clubs and relevant industry peak bodies for feedback. No response was received. Despite poor response, it must be acknowledged (in policy, actions, communications) that the industry need to be 'at the table' in an addressing the harms associated with EGM's.	No. Darebin Council convene a significant number and scope of community advisory structures and linked into various health and community forums. The existing structures were used to inform the policy. This approach was taken based on community feedback from developing Council's previous policy where a separate (less successful) EGM community reference group was created.	No. I think some other 'ground work' relationship building needs to occur in parallel with workshops to get better outcomes. Perhaps this could be an agenda item for LGWGOG.	Use and adapt current local government policies to best fit each LGA and Council. Continue conversations with other relevant Councils.

Council	Link to policy	Policy strengths	Policy weaknesses	Review process	Community engagement details	Engagement with gambling venues	Community reference group used?	Recommendation for a skilled facilitator	Any other information?
<b>Hobsons Bay City Council</b>	Problem Gambling on EGMs Policy Statement <a href="http://www.hobsonsbay.vic.gov.au/Council/Policies-strategies-plans/Social-Policies-Plans/Problem-Gambling-on-EGMs-Policy-Statement">http://www.hobsonsbay.vic.gov.au/Council/Policies-strategies-plans/Social-Policies-Plans/Problem-Gambling-on-EGMs-Policy-Statement</a>	Well researched; covers the key issues; provides commitments across a range of Council departments and activities	The title and focus on 'problem gambling'; it feels a little bit out of date as things have moved a lot in the last 2-3 years; some of the commitments could be stronger (although this was the first policy for HB so there is a lot to build on)	Haven't reviewed it yet ... scheduled for 2019	Community members were engaged in the development of the policy. A gambling attitudes survey was conducted by telephone with 400 residents, and more in-depth interviews were held with service providers, stakeholders and EGM venues	Yes - five of the ten (at that time) venues participated in interview sessions. It is necessary (and helpful) to engage with local venues - otherwise, the policy will lack a critical perspective and will also be open to criticism for not consulting. However, the policy must be entirely independent of the gambling industry.	I don't think so.	Geografia ( <a href="https://www.geografia.com.au/">https://www.geografia.com.au/</a> ) did the consultation activities and reviewed the draft policy (which was developed in-house). I was not involved but those involved were happy with work they provided and would recommend.	If budget allows, consider getting the draft policy peer reviewed to ensure it is as strong as possible
<b>Greater Dandenong</b>	Electronic Gaming Policy <a href="http://greaterdandenong.mmgolutions.net/document/16284/gambling-policy">http://greaterdandenong.mmgolutions.net/document/16284/gambling-policy</a>	Clear, concise, focus on Council's scope for meaningful action	Does not make distinction between EGM and other forms of gambling clear. Also, does not cover the relationship between council and EGM venues	Discussed the policy with a selection of professionals - including internal and external staff - and community members. Did not proceed to a wide community consultation. With the findings of the consultation, we have made adjustments to the policy, which will be proposed to Council shortly.	To some extent, by selecting some community groups and individuals to discuss the policy with.	No. Engaging with the gambling industry is not a good idea; it is a fool's errand. Their interests, and the interests of the community, are diametrically opposed.	No, we did not form a group.	No	Yes. I would suggest, as a first step, having a look at a couple of policies from other councils, especially those which seem to be clear in their intent. As a second step, also requiring only a modest investment of time, I would suggest calling or visiting with relevant staff members from a couple of councils with the clearer policies, to discuss features of their policies and how they have worked out. I think the key is to determine what directions you want to set in your policy. After such matters are settled, the clauses of the policy come easily to hand.
<b>Nillumbik</b>	Nillumbik Gambling Harm Reduction Policy  <a href="http://www.nillumbik.vic.gov.au/files/assets/public/council/council-publications/gambling-harm-minimisation-policy-2016-2021.pdf">http://www.nillumbik.vic.gov.au/files/assets/public/council/council-publications/gambling-harm-minimisation-policy-2016-2021.pdf</a>	prevents clubs from having pokies on council land, commits to assessing gaming applications	community engagement was minimal (survey only)	The old policy couldn't be found so we started from scratch	yes, online survey, submissions to draft	They were invited but didn't respond	No	No	Reports to Council every two years
<b>Mitchell Shire Council</b>	Current policy is Electronic Gaming Machine (EGM) Policy. I am currently working on the 2018 revision which will be titled Mitchell Gambling Policy 2018	Focus on local statistics on EGMs	Focus is on EGM gambling only	We have reviewed the previous policy, conducted a literature review and rewritten the policy. This will go to council for adoption in June as a draft then go out for community consultation.	We will once the draft has been adopted by Council first on June 18. Consultation will take place from June 25 to July 23, 2018.	No	No	No but would be keen to learn from others who have done this.	Have leaned on VLGA for advice and recommendations along the way.

