

PUBLIC HEALTH APPROACH TO GAMBLING HARM POLICY

POLICY OVERVIEW:

The City of Monash presents the *'Public Health Approach to Gambling Harm Policy'* which expresses Council's public health position to gambling through policy, leadership, advocacy and community action. This policy statement outlines our commitment to minimising the harm from gambling in the local community. The key emphasis is placed on reducing the economic, social and health harms associated with Electronic Gambling Machines (EGMs) and other forms of gambling in Monash.

VISION: Monash is a municipality that treats harm from gambling as a public health issue and works in partnership with other agencies to prevent harm to the community. Council empowers its community to live healthy, connected lives free from gambling harm.

APPROVED BY:

APPROVAL DATE:

REVIEW DATE:

The City of Monash acknowledges the Traditional Owners of this land, the Wurundjeri Woi Wurrung and Bunurong People, and recognises their continuing connection to the land and waterways. We pay our respects to their Elders past, present and emerging and extend this to all Aboriginal and Torres Strait Islander peoples.

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PURPOSE

This policy outlines Council's commitment to reducing harm from gambling within the City of Monash and guides Council in its decision making on gambling harm prevention. This Policy has a specific focus on gambling harms as a result of Electronic Gambling Machines (EGMs also known as poker machines or pokies) due to the role Council has in the EGM application process.

CONTEXT

The City of Monash has a history of leadership in the prevention of harm from gambling. This policy is an update to the 'Public Health Approach to Gambling Harm Policy 2016-2020' where the City of Monash elevated gambling harm to the highest level of public health prominence.

The City of Monash's Health and Wellbeing Plan 2021 – 2025 highlights Council's aim to improve the health and quality of life of community members. Preventing harm from gambling is highlighted within priority three; Harm Prevention and indirectly through all priorities listed under Pillar Two: Engaged, Confident and Connected.

The intention of this policy is to build upon the commitment to the reduction of harm from gambling and continue the standing of Monash as a leader and change-agent on this public health issue within the local government sector.

BACKGROUND

The harms from gambling are not limited to financial, and include harms to health, as well as emotional and relationship harms.¹ Gambling harm has been defined as 'any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrease to the health or well-being of an individual, family unit, community or population'.² Low-income earners are significantly more likely to experience harm from gambling.³

Men, and particularly young men are more likely to be classified as a problem gambler.³ A recent study by Australia's National Research Organisation for Women's Safety (ANROWS) showed that for women in intimate partner violent relationships, gambling by either the male perpetrator or the female victim intensified the abuse they suffered.⁴ Women described that increased gambling resulted in increases in their partner's controlling behaviours, anger, physical and sexual abuse.⁴ Population level data on gambling harm is not available for non-binary and gender diverse people.

Financially, gambling harm from EGMs is substantial; of the \$5.4 billion gambling expenditure in Victoria in 2018-19, \$2.4 billion (49%) was lost through EGMs.⁵ In a COVID-19 impacted year where poker machine venues were temporarily shut (venues were closed for 89 days), **\$84,931,441.71** was lost through EGMs at venues within the Monash municipality in the 2021/22 financial year.⁶ Monash ranked 8th highest in LGAs in Victoria, and highest for the Eastern Metropolitan Region.⁶ Prior to COVID-19, over \$110 million was lost each year from 2009-2019 in EGMs in the City of Monash.⁶

The City of Monash has a key focus on reducing gambling harm related to EGMs, however there is growing concern about the impact that sports betting and online gambling is having on our community, in particular to young people. Sports betting losses are still low compared to other gambling products but continue to increase significantly each year. Average losses per Victorian adult have increased by nearly 50 per cent in the past five years.⁵

Advertising of gambling products and particularly sports betting is an area of concern for our community.⁷ A recent study found that in 2021, there was an average of 948 gambling ads per day on

Australian free-to-air TV, which is a 253% increase since 2016.⁸ Another study conducted by Deakin University found that 75% of children 8-16 years old could recall at least one sports betting brand.⁹

The internet continues to grow in popularity as a platform for gambling, making gambling easier and more accessible than ever. A large majority (78.1%) of all people who had bet on sports, such as Australian Rules Football, Cricket or Football (Soccer), had placed bet(s) online within the prior 12 months.³ The rise of online games and gambling themes within online games (such as loot boxes) has raised e-safety concerns that gambling is being normalised for young people.¹⁰ Games that simulate gambling activity may not always offer opportunities to spend money, but groom young participants with actions that look and sound the same as real gambling.¹⁰

GAMBLING AS A PUBLIC HEALTH PRIORITY

It is the position of Monash City Council that gambling is a public health issue which impacts not just individuals but entire families and communities. The public health approach recognises that it is a complex interplay of social, economic and environmental factors that contribute to people's health and potential harm from gambling.¹¹ By applying a public health lens to gambling, it allows for a coordinated, comprehensive approach which works to prevent gambling harm for the whole population not just individuals experiencing significant harm from gambling.¹² We recognise that Council's actions play an important role in the approach and that multiple stakeholders must come together on this important issue including individuals, community groups, businesses and government at all levels.¹¹

There are many factors that play a significant role in this public health issue including social norms, public awareness of gambling issues, accessibility of gambling (both venues and online options), legislation around product design, venue operations and advertising, the EGM application process and the concentration of poker machines in vulnerable areas.

As previously stated, prior to COVID-19, over \$110 million was lost each year from 2009-2019 in EGMs across the 15 venues within the City of Monash (see appendix B). EGM gambling venues with hotel licences are taxed 8.33% of their EGM gambling revenue which goes directly to the State Government's Community Support Fund. However, an EGM gambling venue with a club licence which receives EGM gambling revenue such as an RSL or the Mulgrave Country Club is required by legislation to give an equivalent of at least 8.33% of the venue's net EGM gambling revenue to community purposes or activities each year.¹³ This can be provided through supporting a range of community groups or sporting clubs, often in the form of sponsorship. Venues typically contribute significantly more funds to eligible operating costs such as staff salaries and refurbishment of their own venue (Class 'B' contributions) than contributions to community groups (Class 'A' contributions). For example, in Monash in 2020-21, Club venues claimed \$1.5m in 'Class A' contributions including gifts/donations to sporting clubs and local groups, and \$5.4m in 'Class B' contributions including operating costs and capital improvements.¹³

It can be argued that the detrimental public health impact of EGMs on families and communities outweighs the required financial contribution made to community groups or clubs. This policy does not seek to stop such contributions but prohibits the gambling venue and its facilities and activities from being promoted by those groups or clubs operating from Council-owned or managed land or in Council facilities that receive the contribution.

SCOPE OF POLICY

It is Council's role to seek to protect, improve and promote public health and wellbeing within our municipality. Council recognises that gambling is a legal form of recreation. Council's concern with gambling harm is particularly for those most vulnerable in our community who can least afford to carry the burden of gambling losses. We are concerned about the significant health, social and economic impacts harmful levels of gambling can have to individuals, families and communities.

EGMs remain the most impactful to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain the main focus, the policy looks to cover all gambling activity such as online gambling etc. Council recognises that bingo and raffles can be conducted by community groups in efforts to create social environments or to fundraise for local charities / causes. City of Monash is not looking to prohibit these activities, instead Council wishes to ensure that harm from these activities is minimised.

Council acknowledges groups and clubs that have had sponsorship arrangements with gambling venues will require time to transition to new arrangements, and will ensure that all groups and clubs that receive support/funding/facilities from Council will have a limited transition period to ensure their sponsorship arrangements align with this policy.

CONSULTATION PROCESS

During the development of this policy, Council undertook extensive research and consultation with the Monash community and stakeholder partners.

The guiding principles and priorities listed in this policy are a direct result from the community consultation, data collection and research conducted.

Council undertook a wide range of activities to capture the voice of our community on the role of Council in gambling harm prevention. Methods included a community survey, advisory committee meetings and a joint advisory committee workshop, 1:1 interviews with community stakeholders, and internal consultation, while gambling harm prevention questions were asked as part of the Community Satisfaction Survey.

GUIDING PRINCIPLES

The following principles are the foundation on which Council's commitments to reducing harm from gambling are built upon.

Research:

Undertaking up to date research, Council will continue to source and maintain accurate data, information and research on EGMs and other forms of gambling. Where possible Council will participate in and promote gambling harm prevention research to contribute to the evolving evidence base.

Funding:

To continue to progress its public health leadership, activity and advocacy in gambling prevention, City of Monash will continue to dedicate resources to this issue and seek external funding opportunities where possible.

Partnerships:

The City of Monash will continue to foster its long-standing partnerships with peak bodies, associations, and community organisations such as Municipal Association of Victoria, Victorian Local Government Association, the Alliance for Gambling Reform, Gambler’s Help and Link Health & Community in the progression of its public health approach to gambling.

Language:

Council rejects ‘responsible gambling’ rhetoric, which seeks to shift the responsibility to the individual. This language deliberately hides the predatory conduct of the gambling industry, Council will consciously use evidence based public health language in communicating gambling harm prevention messages.

Gender Equity:

Gender can impact on a person’s experiences of harm from gambling. Council acknowledges the evidence-based link between family violence and harm from gambling and is committed to advocacy within this space. A Gender Impact Assessment has been conducted on this policy and Council will continue to assess the impact and effect that this policy statement and Council’s initiatives may have on people of different genders.

Intersectionality:

Council recognises that people’s lives are multi-dimensional and complex and therefore our response to gambling harm prevention cannot be developed through a singular lens.

ROLE OF COUNCIL IN GAMBLING HARM PREVENTION

The role of Council in gambling harm prevention can be summarised into four categories:

Plan & Regulate: Council is involved if a venue operator applies for new EGMs to be brought into Monash. Council can accept the planning permit or reject it based on whether there is evidence the new machines will negatively impact the community. Refer to Appendix C for a description of the EGM application process.

Advocate & Lead: Many regulations on the gambling industry are set by State and Federal agencies. Council has a responsibility to act on the needs and concerns of our community and represent these views to the appropriate governing bodies. Council can lead by example by not taking direct contributions from the gambling industry, and we can continue to elevate gambling harm to the highest level of public prominence through strategic documents such as our Health & Wellbeing Plan.

Fund & Resource: Council can support social initiatives that don’t involve gambling through our Community Grants program or through council run programs and events.

Communicate: We can keep the Monash community up to date with local gambling information such as losses, campaigns to reduce harm and any planning permits received for new EGMs.

PRIORITIES

1 Plan & Regulate

- 1.1 When considering applications for new or transferred EGMs, Council will consider each case individually based on merits.

- 1.2 Council will oppose applications to the VGCCC for new EGMs licences, increases in EGMs or transfer of EGMs when an application is seen to cause a net social or economic detriment to the local area.
- 1.3 Council will not support any application for EGMs on Council owned or managed land. All planning decisions and advice relevant to gambling matters will be made with reference to this Policy Statement and the relevant provisions of the amended Monash Planning Scheme:
- Clause 52.28- Gambling
 - Clause 21.05-2- Economic Development ‘Key issues’
 - Clause 21.05-3- Economic Development ‘Objectives, strategies and implementation’
 - Clause 21.06-2 – Major Activity and Neighbourhood Centres ‘Key issues’
 - Clause 21.06-3- Major Activity and Neighbourhood Centres ‘Objectives, strategies and implementation’
- [\[Monash Planning Scheme\]](#)
- 1.4 Council will actively discourage and oppose any increase in the number of EGMs, density of EGMs or numbers of gambling venues in any areas with high concentrations of people most at risk of harm from gambling.
- 1.5 Gambling activity or the promotion or advertising of any gambling activity or venue on Council-owned or managed land or in Council facilities is prohibited. This includes but is not limited to advertising or promotion within clubrooms, via newsletters or email banners, on club attire or paraphernalia, or on sports ground fencing or scoreboards. This pertains to all forms of gambling advertising, particularly sports betting, online gambling and EGM venues. Failure by user groups or tenants to comply with this requirement will result in their use of the facility being jeopardised.

2 Advocate & Lead

- 2.1 Council will advocate for a continuation of the current maximum municipal limit and regional cap in the municipality and will oppose any increase to that number or the inappropriate relocation of existing machines to areas that are considered vulnerable taking into account the SEIFA index of disadvantage.
- 2.2 Council will continue to advocate for regulatory reform to reduce harmful practices in the gambling industry including but not limited to:
- Advocating for the permanent reduction of gambling room operating hours, with all gambling rooms to be closed between midnight and 10am.
 - Council will advocate for the reduction of sports betting advertising, particularly within the live viewing of sport and to young people.
 - Advocate for the reduction of the maximum bet on EGMs to \$1 per spin.
 - Advocate that Class A community benefits provided by gambling venues should be provided as gifts or donations to community groups and clubs, not as sponsorship.
- 2.3 Council will apply a public health approach to harm prevention and focus on collaborative action with State Government, Alliance for Gambling Reform, peak bodies, community partners and other councils to reduce and prevent gambling harm within Monash.
- 2.4 Council will continue to elevate gambling to the highest level of public health prominence in Council strategic documents.

- 2.5 Council staff will not attend gambling venues when representing the City of Monash, unless undertaking statutory functions. Councillors, when representing the City of Monash in a formal capacity, are discouraged from attending gambling venues however there may be circumstances where the Councillor determines the event warrants attendance and can exercise their discretion.

3 Fund & Resource

- 3.1 Council will resource, promote and seek external funding for a range of non-gambling social, cultural and recreational programs and events as an alternative to gambling in Monash including targeted strategies for those most at risk.
- 3.2 Council will not facilitate any gambling activity nor hold any community activity, event, program and social outing in venues that have EGMs or gambling activities.
- 3.3 The Monash Community Grants Program will not fund activities or events that occur in venues that have EGMs or gambling activities.
- 3.4 Council does not provide support (including use of its facilities), funding, publicity or promotion for community groups/organisations/sports clubs that promote or advertise gambling, particularly EGMs, sports betting, and online gambling. This excludes commemorative events such as ANZAC Day that are held by approved RSL clubs. All relevant Council policies and guidelines will align with this policy position.
- 3.5 Council will maintain independence from the gambling industry. Council will not accept direct financial contributions from the gambling industry and will not promote community grants or initiatives offered by local EGM venues.
- 3.6 Council will block and filter internet accounts across council provided equipment and internet (WiFi) to ensure computers are not being accessed for gambling activity by staff and community.

4 Communicate

- 4.1 Council will provide public notice to the community when there is an application for new EGMs licences, an increase in or transfer of EGMs, consult where applicable and publish copies of all gambling related submissions it makes on the Council website.
- 4.2 Council will continue to raise awareness of the gambling harm occurring locally by communicating gambling losses, EGM numbers, gambling prevalence, current public health research and health and wellbeing impacts.
- 4.3 Council will provide and partner on opportunities for community and staff to learn about gambling issues, prevention and help seeking.
- 4.4 Council will promote Gambler's Help and family violence support services in all communications regarding gambling harm.

APPENDIX A – CURRENT STATISTICS AND RESEARCH

Gendered statistics

Over two-thirds of Victorian adults had spent money on some form gambling, inclusive of lottery products, in the last twelve months (69.0%). There was little difference in participation between the men and women based on available data (69.9% of men, 68.2% of women).

Data suggests young men (under 45) are the age/gender most likely to be classified as a problem gambler.³ For women, the age group where problem gambling prevalence is highest is 45-54 years old.³

Evidence showed men were more likely to gamble on EGMs and sports betting than women.

However, of people that do gamble on EGMs, women are more likely than men to spend longer gambling on EGMs (1-3+ hours).³

As noted in the background section, population level data for gambling harm is not available for non-binary and gender diverse peoples.³

Australia

Total gambling expenditure in Australia was \$24.887 billion in 2017/18. Per adult gambling expenditure in Australia was \$1,292 and total electronic gambling machine expenditure in Australia was \$12.520 billion.⁵

Victoria

More than two-thirds of adult Victorians (69%) have participated in some form of gambling in the past twelve months.³ The most popular form of gambling was lottery ticket purchases (44.4% of adults), followed by raffle tickets (37.4%), horse, harness or greyhound race betting (19.8%) and pokies (14.1%).³ Participation is highest among people aged 65–74 years (78%), and lowest among people 18–24 (52.4%).³ EGM's alone account for 37.7% of gambling harm in Victoria and 6.1% of Victorian adults are harmed by someone else's gambling.³

City of Monash

In January 2020, City of Monash ran a 'Perceptions about gambling and gambling-related harms' survey within the community. These results demonstrated that:

- 55% of survey respondents strongly agreed, and a further 16% agreed that 'The negative impact to the community from gambling products outweighs the benefits'.
- 49.5% of respondents believe that EGMs are 'Very Harmful' to the local community, 26.5% believe they are 'Harmful', with 24% believing they are 'Not at all harmful'.
- Out of the participants who visited a venue with EGMs within the City of Monash, 44% attended to enjoy the food or drink, 31% went to meet or socialise with friends, and 11% went to play the EGMs.
- 26% of participants used the EGMs once at a venue, for 18% of participants it wasn't the main reason for their visit.

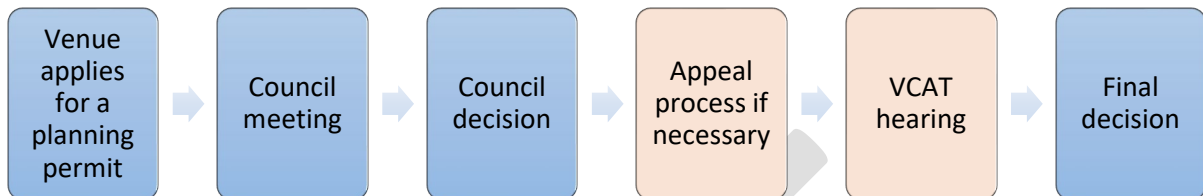
During COVID-19 lockdown, for the first time in nearly three decades, all 955 poker machines in the City of Monash were switched off. Throughout lockdown, \$74,298,086 was saved by community members that would have otherwise been lost at local gambling machine venues (based on the average total daily loss of \$312,177 from July 2019 – February 2020).

APPENDIX B – CURRENT MONASH VENUES

Venue Name	Expenditure 01 Jul 21 - 30 June 22 ¹⁴	EGM Numbers as at 15 March 2022
CENTURY CITY WALK	\$ 8,068,594.43	65
CLAYTON RSL	\$ 3,547,807.53	71
FORESTERS ARMS HOTEL	\$ 3,518,620.98	46
LEIGHOAK	\$ 4,761,186.17	92
MATTHEW FLINDERS TAVERNER	\$ 7,378,803.10	75
MONASH HOTEL	\$ 4,950,941.47	44
MOUNTAIN VIEW HOTEL	\$ 6,676,867.81	62
MULGRAVE COUNTRY CLUB	\$ 9,057,977.26	105
OAKLEIGH JUNCTION HOTEL	\$ 3,611,231.60	45
THE CLAYTON HOTEL	\$ 4,488,860.37	35
THE VALE HOTEL	\$ 7,057,934.69	55
VEGAS AT WAVERLEY GARDENS	\$ 6,846,961.72	75
VILLAGE GREEN HOTEL	\$ 8,134,374.66	78
WAVERLEY RSL CLUB	\$ 3,185,013.11	67
WHEELERS HILL HOTEL	\$ 3,646,266.81	40

APPENDIX C – VICTORIAN COMMISSION FOR GAMBLING AND LIQUOR REGULATION REGULATORY PROCESS

Currently the regulatory process for applying for a planning permit to own and operate EGM's is as follows:



To operate a venue with EGM's, the operator needs to secure both a gaming licence from the VCGLR, as well as a planning permit from Council. After Council makes a decision at the Council Meeting, the venue or community members have 28 days to appeal.

Before deciding on an application, in addition to the decision guidelines of Clause 65 of the Planning Scheme, the responsible authority must consider, as appropriate:

- The Municipal Planning Strategy and the Planning Policy Framework.
- The compatibility of the proposal with adjoining and nearby land uses.
- The capability of the site to accommodate the proposal.
- Whether the gambling premises provides a full range of hotel/club facilities or services to patrons.
- Any other matters specified in the schedule to this clause.

Clause 65 of the Planning Scheme adds considerations as to the effect on the environment, human health and amenity of the area.

Section 60 of the P&E Act 1987 – requires consideration be given to any significant social effects and economic effects which the responsible authority considers the use or development may have.

As per the current gambling machine regional caps and limits,¹⁴ the maximum permissible number of gambling machine entitlements under which gambling may be conducted in the City of Monash is 1393. Monash is one of few local government areas where a regional cap AND a municipal limit applied.

As of April 2022, City of Monash has a regional cap determined by the VCGLR that has a maximum permissible number of gambling machine entitlements of 616. This area includes:

- Ashwood
- Chadstone
- Clayton
- Hughesdale
- Huntingdale
- Oakleigh
- Oakleigh East
- Oakleigh South
- Mulgrave

- Notting Hill

Remaining suburbs within Monash are limited by a municipal limit of 777 gambling machine entitlements. The municipal limit is calculated at a ratio of 10 gambling machines per 1000 adults. If population rises, the limit may increase.¹⁴ Areas within Monash covered by the municipal cap include:

- Glen Waverley
- Mount Waverley
- Wheelers Hill

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APPENDIX D – IMPLEMENTATION AND REVIEW

This Policy Statement will inform and be applied to all relevant Council planning, policy, programs and decision-making. The Statement is to have whole-of-Council ownership.

Council will review this Policy Statement every two years or as necessary when evidence base or legislation changes.

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REFERENCES

1. VRGF, 2016, Fact sheet 2: The seven dimensions of gambling harm, Assessing gambling-related harm in Victoria: a public health perspective
<https://responsiblegambling.vic.gov.au/documents/166/Harm-study-Fact-sheet-2-Seven-dimensions-of-gambling-harm.pdf>
2. Langham et al., 2016, p4. Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms.
3. Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, Victorian population gambling and health study 2018–2019, Victorian Responsible Gambling Foundation, Melbourne.
<https://responsiblegambling.vic.gov.au/resources/publications/victorian-population-gambling-and-health-study-20182019-759/>
4. Hing, N., O’Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., Rawat, V. 2020. The relationship between gambling and intimate partner violence against women (Research report, 21/2020). Sydney: ANROWS.
5. Queensland Government Statistician's Office, Queensland Treasury, Australian Gambling Statistics, Summary tables, 36th edition, 2021.
<https://www.qgso.qld.gov.au/issues/2646/australian-gambling-statistics-36th-edn-1993-94-2018-19-summary-tables.pdf>
6. VCGLR website, Monthly LGA EGM Statistics, Monash.
[Victorian Commission for Gambling and Liquor Regulation: Monthly LGA EGM Statistics \(vcglr.vic.gov.au\)](http://victoriancommissionforgamblingandliquorregulation.vic.gov.au)
7. City of Monash, Gambling Harm Prevention Policy - Community Consultation Report, 2022 (unpublished)
8. VRGF website, News and media.
[948 gambling ads daily on Victorian free to air TV in 2021, up 253% from 2016 \(responsiblegambling.vic.gov.au\)](https://responsiblegambling.vic.gov.au/news-media/948-gambling-ads-daily-on-victorian-free-to-air-tv-in-2021-up-253%25-from-2016)
9. Thomas, SL, Pitt, H, Bestman, A, Randle, M, Daube, M, Pettigrew, S 2016, Child and parent recall of gambling sponsorship in Australian sport, Victorian Responsible Gambling Foundation, Melbourne.
<https://responsiblegambling.vic.gov.au/resources/publications/child-and-parent-recall-of-gambling-sponsorship-in-australian-sport-67/>
10. E-Safety Website, Online Gaming. <https://www.esafety.gov.au/parents/big-issues/gaming>
11. VRGF 2015, Using a public health approach in the prevention of gambling-related harm, background paper.
<https://responsiblegambling.vic.gov.au/documents/21/using-a-public-health-approach-in-the-prevention-of-gambling-related-harm.pdf>
12. Productivity Commission 2010, Gambling, Report no. 50, Canberra, page 149.
<https://www.pc.gov.au/inquiries/completed/gambling-2010/report/gambling-report-volume1.pdf>
13. VGCCC website, Community Benefit Statements. <https://www.vgccc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/your-obligations/community-benefit>
14. VCGLR website, Gaming expenditure by venue.

[Gaming expenditure by venue | Victorian Commission for Gambling and Liquor Regulation \(vcglr.vic.gov.au\)](https://www.vcglr.vic.gov.au)

15. VCGLR website, regional caps and municipal limits
https://www.vcglr.vic.gov.au/sites/default/files/Ministerial_Order_-_new%20regional_caps_and_municipal_limits.pdf

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