

2.3 PUBLIC HEALTH APPROACH TO GAMBLING HARM POLICY

(Author: KJ)

Responsible Director: Russell Hopkins

EXECUTIVE SUMMARY

The *Public Health Approach to Gambling Harm Policy* [the Policy] is an update to the previous *Public Health Approach to Gambling Policy Statement 2016-2020*. The 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.

PURPOSE

The purpose of this report is to seek Council's endorsement of the *Public Health Approach to Gambling Harm Policy*.

KEY CONSIDERATIONS/ISSUES

Key changes in the updated Policy include:

- Updated evidence base and inclusion of available gendered data.
- Simplified language and summarised policy statements.
- Language regarding EGM applications has been updated to clearly articulate Council's position to prevent harm to the most vulnerable areas within the municipality.
- New advocacy points in line with the Alliance for Gambling Reform advocacy campaigns.
- Clearer wording regarding not providing Council support or resources to community groups and clubs that promote gambling, in particular EGM venues, sports betting and online gambling.
- A clear direction that Council will only allow access to Council-owned or managed land or Council facilities by groups or clubs which adhere to the terms of this Policy. There will be a four-year transition period for clubs to align their sponsorship activities with the gambling policy.

The Policy seeks to build on the success of previous Council policies, initiatives, and leadership to prevent harm from gambling within the Monash community.

FINANCIAL IMPLICATIONS

The Policy and associated actions will be implemented within existing Council resources.

CONCLUSION/RECOMMENDATION

The *Public Health Approach to Gambling Harm Policy* has been prepared for Council endorsement after community consultation. The Policy reflects Council's commitment to improving the lives of the Monash community through the prevention of harm caused by gambling.

2.3 PUBLIC HEALTH APPROACH TO GAMBLING HARM POLICY

(Author: KJ)

Responsible Director: Russell Hopkins

RECOMMENDATION

That Council endorse the Public Health Approach to Gambling Harm Policy.

INTRODUCTION

The purpose of this report is to seek Council endorsement of the *Public Health Approach to Gambling Harm Policy* (refer **Attachment 1**). 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.

BACKGROUND

Council's *Public Health Approach to Gambling Policy Statement 2016-2020* is due for review and renewal. Gambling harm is not limited to financial harm, it includes harm to mental and physical health, family and relationships, work/study and cultural harm. Harm from gambling is a major public health issue in Australia, with the most recent data estimating that Australians lost \$25 billion on legal forms of gambling, representing the largest per capita losses in the world. In Victoria, Electronic Gaming Machines (EGMs, commonly known as pokies) contribute to 49% of the \$5.4 billion lost to gambling.

Despite the COVID-19 lockdowns causing venues to close for 89 days, \$84,931,441.71 was lost in the 15 Monash EGM venues in the 2021/22 financial year. This places Monash in the top 10 local government areas (LGAs) for EGM losses in the state, ranking 8th highest of all LGAs, and highest for the Eastern Metropolitan Region. Prior to COVID-19, over \$110 million was lost each year from 2009-2019 in EGMs in the City of Monash. Of the 15 venues in Monash, five operate with a 'club' licence. This means under the Gambling Regulation Act 2003, club venue operators are required to give back to the community, the community benefit must be equal to at least 8.33% of its net gambling machine revenue.

The gambling landscape has changed since the last policy was written due to factors such as the COVID-19 lockdowns impacting EGM venue operations, increasingly accessible gambling options through online betting and a significant increase in the amount of gambling advertising, particularly sports betting advertising. The City of Monash has a history of leadership in gambling harm prevention advocacy and initiatives. This policy seeks to build upon that history and the foundation of the previous policy.

DISCUSSION

Local government can play a key role in preventing harm from gambling, particularly harm from EGM gambling. Council is involved in the planning and regulation of new EGMs through its role in the planning permit process. Council can also advocate to reduce the harmful practices of the gambling industry, fund recreation alternatives to gambling, create environments free from gambling advertising and communicate to our community the harmful impacts of gambling in the municipality.

This Policy outlines the commitments the City of Monash will make to prevent gambling harm in Monash. The Policy includes guiding principles incorporating best practice in gambling harm prevention including research, funding, partnerships, language, intersectionality, and gender equity. The policy statements are based on the role of local government in gambling harm prevention. These include categories such as:

- **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.

Key changes in the updated Policy include:

- Updated evidence base and inclusion of available gendered data.
- Simplified language and summarised policy statements.
- Language regarding EGM applications has been updated to clearly articulate Council's position to prevent harm to the most vulnerable areas within the municipality.
- New advocacy points in line with the Alliance for Gambling Reform advocacy campaigns.

- Clearer wording regarding not providing Council support or resources to community groups and clubs that promote gambling, in particular EGM venues, sports betting and online gambling.
- A commitment to advocate that sponsorship arrangements between pokies venues and groups / clubs should not be recognised as community benefit class A qualifying licenced clubs for tax breaks.
- A clear direction that Council will only allow access to Council-owned or managed land or Council facilities by groups or clubs which adhere to the terms of this Policy. There will be a four-year transition period for clubs to align their sponsorship activities with the gambling policy.

The Policy seeks to build on the success of previous Council policies, initiatives, and leadership to prevent harm from gambling within the Monash community.

POLICY IMPLICATIONS

The *Monash Health and Wellbeing Plan 2021-2025* outlines Council's commitment to improving the health and wellbeing of the Monash community. Gambling harm prevention is specifically identified within Priority Three: Harm Prevention and indirectly through Pillar Two: Engaged, Confident and Connected.

CONSULTATION

Officers have completed two phases of community consultation to inform the Policy. In phase one (presented to Council at its July meeting), key policy statements were posed to community for feedback. All policy statements had a high level of support.

Statements included:

Council should:

- Protect our most vulnerable communities against any detrimental social, economic and health impacts of any new electronic gaming machine (pokies) applications (**96% agreed**).
- Maintain independence from the gambling industry by refusing direct financial or 'in kind' contributions from the gambling industry (**98% agreed**).
- Work with community groups and organisations that use Council land, facilities or receive Council funding to promote social environments that don't associate with gambling (**88% agreed**).
- Advocate for regulatory reform to prevent harms to public health from gambling/pokies and promote harm minimisation strategies (**92% agreed**).
- Communicate with the Monash community on key issues of gambling including local gambling data, Council's advocacy initiatives, harm prevention messages and referral pathways for help with gambling addiction (**85% agreed**).
- Protect children, young people and vulnerable members of our community from gambling harm by not allowing any forms of promotional material in relation to gambling or associated venues to be

displayed where the community come to work, socialise or recreate on Council land **(96% agreed)**.

- Advocate for a continuation of the current maximum municipal cap of 777 EGMs (pokie machines) in the municipality and will oppose any increase to that number or the inappropriate relocation of existing machines to areas that are considered vulnerable **(92% agreed)**.

Phase two of consultation invited community and stakeholders to provide feedback on the draft policy. Seven submissions received via Shape Monash gave unanimous support for the policy. Feedback was received via email from two other sources, both also in support of the policy. Minor amendments were made following the feedback of the Victorian Local Government Association including:

- Stronger wording positioning Council as well placed to understand the effects of gambling on the community (change to Scope of the Policy p6).
- Clarification that while gambling is a legal form of recreation, Council sees the harm it causes (change to Scope of the Policy p6).
- Deletion of 'to the VGCCC' from policy statement 1.5. New processes for the transfer of EGMs between local government areas introduced in 2022 impact Council's avenues to oppose transfers of EGMs. If the transfer is within the current licence limit the venue has, for Council to oppose a transfer it would need to leverage community and media advocacy, not through the VGCCC process.
- All comments received are listed in table 2 of the Consultation Report **(Attachment 2)**.

SOCIAL IMPLICATIONS

The *Public Health Approach to Gambling Harm Policy* will support Council's agenda for a healthy and engaged Monash community, with a focus on prevention of harm from gambling.

HUMAN RIGHTS CONSIDERATIONS

The *Public Health Approach to Gambling Harm Policy* recognises that gambling is a legal form of recreation; all community members have a right to choose to participate in gambling. The Policy does not restrict a person's choice to gamble, with the focus of the Policy on preventing harm from gambling.

GENDER EQUITY ASSESSMENT

As this policy is considered to have a direct and significant impact on the Monash community, a gender impact assessment (GIA) has been undertaken as part of this work. All people, regardless of gender, are impacted by harm from gambling. This could be harm caused by another person such as a loved one or employee or harm from gambling directly.

Population level quantitative data is not available on behaviours of gender diverse and non-binary people; data on gambling behaviour is only broken down by 'male' or 'female' classifications.

Data available from the 'Study of Gambling and Health in Victoria' (Victorian Responsible Gambling Foundation 2019) shows:

- Men are significantly more likely to experience harm from their own gambling than women (1% of men vs. 0.5% of women experience significant problems with gambling).
- More severe gambling problems are prevalent in young men (25-44 years old).
- The age bracket for women where prevalence of gambling harm is highest is 45-54 years old (3.3% experience moderate or severe harm). Prevalence of gambling problems within men of the same age bracket was still slightly higher (3.7% of men aged 45-54 and 3.3% of women aged 45-54 were classified as moderate or problem gamblers).

Furthermore, a recent ANROWS study (2020) shows there is a link between family violence and gambling. Gambling by both the male perpetrator and the female victim resulted in intensified intimate partner violence against women.

There has been a link identified between loneliness and gambling. Groups of people that might be at risk of loneliness or alienation may also be at a higher risk of harm from gambling. This could include people with a disability, newly arrived community members and older people. People who speak a language other than English at home will also have a unique set of needs and risk to gambling harm, in part due to risk of loneliness. People that speak a language other than English are also more likely to have barriers to engaging with gambling harm awareness messages/education and gambling support services.

As a result of the GIA, the following recommendations have been incorporated into the Policy and associated actions:

- When collecting gambling policy consultation data, Council will capture disaggregated data including data for people who are transgender or gender diverse, age and cultural background.
- Acknowledgement of the link between family violence and gambling within the Policy.
- Policy includes commitment to deliver targeted gambling harm prevention strategies to engage vulnerable community members.
- Policy includes commitment to promote family violence support services when communicating gambling harm prevention messages.
- Inclusion of gendered statistics available on gambling harm within the Policy.

FINANCIAL IMPLICATIONS

The Policy and associated actions will be implemented within existing Council resources.

CONCLUSION

The *Public Health Approach to Gambling Harm Policy* has been prepared for Council endorsement. The Policy reflects Council's commitment to improving the

lives of the Monash community through the prevention of harm caused by gambling.

ATTACHMENTS

Attachment 1: *Public Health Approach to Gambling Harm Policy*

Attachment 2: *Phase Two Consultation Report*



CITY OF
MONASH

PUBLIC HEALTH APPROACH TO GAMBLING HARM POLICY



Public Health

APPROACH TO GAMBLING HARM POLICY

POLICY OVERVIEW:

Monash Council's Public Health Approach to Gambling Harm Policy expresses Council's position 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.



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ACKNOWLEDGEMENT OF COUNTRY

Monash Council 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.

Mayor's

MESSAGE

It is with great pleasure that I introduce Monash Council's Public Health Approach to Gambling Harm Policy.

The gambling industry has developed powerful and persuasive tactics to promote gambling and gambling participation, resulting in our communities experiencing significant losses. A coordinated approach involving all levels of government, businesses and community is required to combat gambling harm.

Gambling harm affects our community's financial and mental health, relationships, work, study, and connection to culture. In 2021/22, \$84.9 million was lost to pokies in the City of Monash, despite COVID-19 lockdowns and venue closures. Prior to this, an average of \$110 million was lost each year.

This policy has been informed by community consultation. Our community is concerned about gambling harm and about long opening hours and venue design making pokies too widely accessible.

Our community told us they were also frustrated and concerned about excessive advertising of gambling products. Particularly the impacts on our younger generation, who are growing up regularly exposed to advertising messages through television, radio and social media.

Preventing gambling harm is not just the responsibility of a few. Council plays a direct role in preventing gambling harm and has a proud history as a leading change agent for reducing gambling harm in our community.

This policy strengthens Council's commitment to reduce gambling harm and will advocate for:

- » Reduced and set opening hours for all pokies venues
- » Reform to pokies design including \$1 maximum bets
- » No gambling advertising during sports broadcasts.

While consulting on this strategy, our community told us their vision is that:

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.

This policy outlines our commitment to achieve this vision by reducing gambling harm within our community and using Council's position to affect change and advocate for state-wide and national gambling reform.

I also acknowledge the guidance, leadership, and advocacy of Cr Stuart James as Mayor on this Plan during his time as Mayor from 2021/22.



Cr Tina Samardzija
Mayor



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

Monash Council 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 Monash elevated gambling harm to the highest level of public health prominence.

Council'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. As the closest level of government to the community, Council is best placed to understand the effects of gambling and to limit the negative impacts of gambling on our community.



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 local government areas (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

Council 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 has 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 aged 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 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.

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, Mulgrave Country Club, Leighoak or Vegas on Waverley

Gardens are 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 declared \$2.2 million in 'Class A' contributions including gifts/donations to sporting clubs and local groups, and \$5 million 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. Gambling has been categorised as a legal form of recreation, however, as the closest level of government to community, Council sees the significant harm gambling causes within the community. 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. While 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. 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, Council will continue to dedicate resources to this issue and seek external funding opportunities where possible.

Partnerships:

Council 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 and 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 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- Gaming
 - » 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'

 planning-schemes.app.planning.vic.gov.au/Monash/ordinance
- 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 and 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 Socio-Economic Indexes for Areas (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 elimination 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. When representing Council

in a formal capacity, Councillors 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 and 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 of gambling, inclusive of lottery products, in the last 12 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 EGM 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 12 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 aged 18-24 (52.4%).³ EGMs 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, Monash Council 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 lockdowns, 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

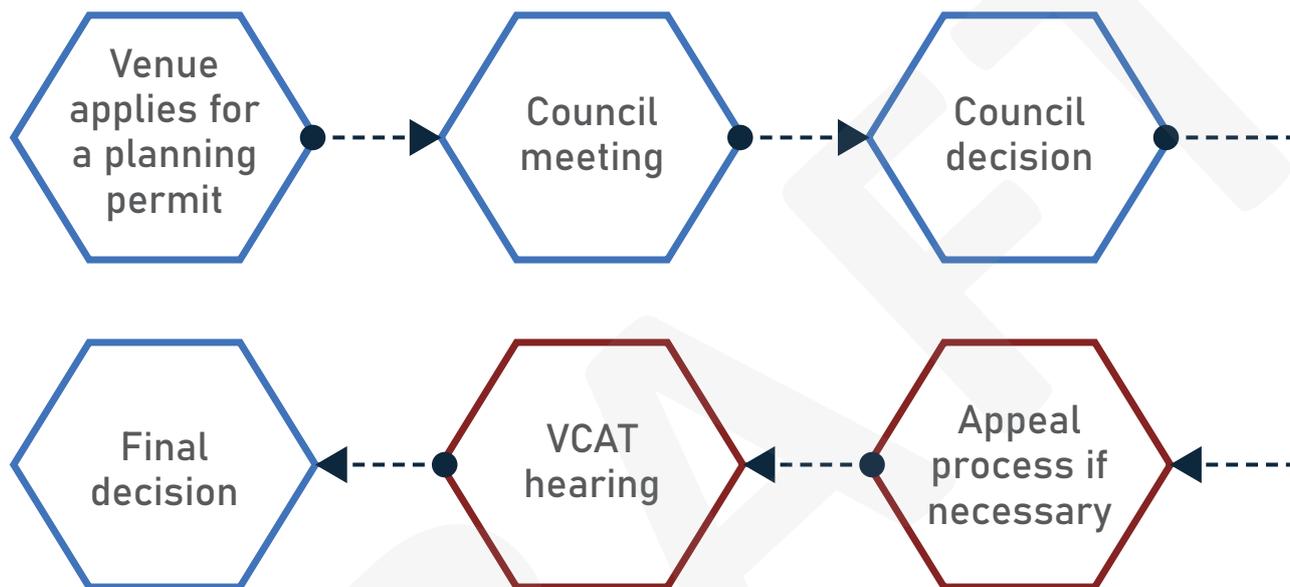
Current Monash Venues

Venue Name	Expenditure 01 Jul 21 - 30 June 22 ¹⁴	EGM Numbers as at 15 March 2022	Owned by
Club venue			
MULGRAVE COUNTRY CLUB	\$ 9,057,977.26	105	Mulgrave Country Club
VEGAS AT WAVERLEY GARDENS	\$ 6,846,961.72	75	Melbourne Racing Club F&B Limited
LEIGHOAK	\$ 4,761,186.17	92	Moonee Valley Racing Club Inc
CLAYTON RSL	\$ 3,547,807.53	71	Clayton RSL Sub-Branch Inc
WAVERLEY RSL CLUB	\$ 3,185,013.11	67	Waverley RSL Sub-Branch Inc
Hotel venues			
VILLAGE GREEN HOTEL	\$ 8,134,374.66	78	ALH Group Pty Ltd
CENTURY CITY WALK	\$ 8,068,594.43	65	ALH Group Pty Ltd
MATTHEW FLINDERS TAVERNER	\$ 7,378,803.10	75	ALH Group Pty Ltd
THE VALE HOTEL	\$ 7,057,934.69	55	ALH Group Pty Ltd
MOUNTAIN VIEW HOTEL	\$ 6,676,867.81	62	ALH Group Pty Ltd
MONASH HOTEL	\$ 4,950,941.47	44	ALH Group Pty Ltd
THE CLAYTON HOTEL	\$ 4,488,860.37	35	L'unico Pty Ltd
OAKLEIGH JUNCTION HOTEL	\$ 3,611,231.60	45	ALH Group Pty Ltd
WHEELERS HILL HOTEL	\$ 3,646,266.81	40	ALH Group Pty Ltd
FORESTERS ARMS HOTEL	\$ 3,518,620.98	46	Castello Forester's Arms Hotel Pty Ltd

APPENDIX C

Victorian Gambling and Casino Control Commission (VGCCC) Regulatory Process

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



To operate a venue with EGMs, the operator needs to secure both a gaming licence from the VGCCC, 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 Planning and Environment 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 is applied.

As of April 2022, the 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





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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CITY OF
MONASH

Monash Civic Centre | 293 Springvale Road, Glen Waverley, 3150 | 8.30am to 5pm | Monday to Friday

Oakleigh Service Centre | 3 Atherton Road, Oakleigh, 3166 | 8.30am to 5pm | Monday to Friday

9518 3555 | www.monash.vic.gov.au | mail@monash.vic.gov.au

National Relay Service (for people with hearing or speech impairments) 1800 555 660

Language Assist

普通话 9321 5485

Ελληνικά 9321 5482

廣東話 9321 5481

සිංහල 7005 3002

Italiano 9321 5483

हिंदी 7005 3000

Việt Ngữ 9321 5487

தமிழ் 7005 3003

한국어 9321 5484

Bahasa Indonesia 7005 3001



Gambling policy consultation – Phase Two

Participant feedback

Participation

Initial consultation to inform the Public Health Approach to Gambling Harm Policy occurred 4 March – 3 April 2022. Stakeholder interviews, a focus group, and a Shape Monash survey resulted in 65 participants providing input to the draft Public Health Approach to Gambling Harm Policy. Refer to the Phase One Gambling Policy Consultation Report.

Three questions relating to Council’s gambling harm prevention actions were added to the Community Satisfaction Survey (conducted 1 April – 20 May), 800 residents were surveyed via telephone.

Phase two of the consultation was the public exhibition of the draft Public Health Approach to Gambling Harm Policy for a period of six weeks from 7 September – 19 October 2022. Community and stakeholders were encouraged to provide their feedback on the draft policy via Shape Monash.

The opportunity to provide feedback on the policy was advertised using the below methods of communication:

- Article on gambling harm and the consultation opportunity in the August Bulletin
- Council social media channels
- People that had previously provided input in phase one of the consultation via Shape Monash
- All of Council’s advisory committee members
- Two emails sent to all Monash sporting clubs
- Two emails sent to Monash Community Grant Program recipients
- Electronic Gaming Machine (EGM) venue operators (including Clubs, Hotels and RSLs) contacted via email
- Clubs Victoria (peak body for club licenced EGM operators) contacted via email
- Peak bodies including Victorian Local Government Association and Alliance for Gambling Reform contacted via email
- Local community health services including LINK Community Health & Gamblers Help Eastern contacted via email

Formal responses were received from seven respondents via Shape Monash, one peak body provided feedback formally via email and informal feedback was received via email following a discussion within one advisory committee.

Participants

Demographics were included within the Shape Monash page, and the below details describe demographics of the seven Shape Monash participants.

All participants identified as a community member; one participant also identified as a health promotion practitioner. No responses were received from representatives of a community group, sports club or someone who works in the gambling industry.

Which best describes your interest in the gambling policy?		
Skipped: 0 Answered: 7 (100%)		
Answer choices	Percent	Count
I am a community member	100%	7
I am a member of a community group	0%	0
I am a member of a sports club	0%	0
I work in the health promotion / prevention sector	0%	0
I work in the gambling industry	0%	0

Respondents were mostly aged 50 years and over (5 participants), with 2 participants in the younger age groups.

Age group:		
Skipped: 0 Answered: 7 (100%)		
Answer choices	Percent	Count
Under 18 years old	0%	0
18-34 years old	28.6%	2
35-49 years old	0%	0

50-64 years old	42.9%	3
65+ years old	28.6%	2

Majority of respondents identified as men.

Your gender:		
Skipped: 1 Answered: 6 (85.7%)		
Answer choices	Percent	Count
Woman	16.7%	1
Man	83.3%	5
Prefer not to say	0%	0
Prefer to self describe	0%	0

Majority of participants spoke English at home, two participants spoke Tamil and French/German at home.

What languages, other than English are spoken regularly in your home?		
Skipped: 5 Answered: 2 (28.6%)		
Answer choices	Percent	Count
Mandarin	0%	0
Greek	0%	0
Singhalese	0%	0
Italian	0%	0
Hindi	0%	0

Other	100%	2
Comments provided: Tamil and French/German		

Suburb:		
Skipped: 0 Answered: 7 (100%)		
Answer choices	Percent	Count
Ashwood / Burwood / Chadstone / Oakleigh South	42.9%	3
Glen Waverley	14.3%	1
Hughesdale	14.3%	1
Huntingdale	0%	0
Mount Waverley	14.3%	1
Notting Hill	0%	0
Oakleigh	0%	0
Oakleigh East	0%	0

Feedback Results

Support for Council's policy was strong. The comments received and Officer responses are summarised in the table below. Most participants provided multiple comments, these comments have been separated in the table below for clarity.

Informal feedback following a discussion with members of the LGBTIQ+ advisory committee was received; advisory committee members were pleased with the language used throughout the gambling policy including the acknowledgement that there are no population level statistics on gambling behaviours for non-binary and gender diverse people. This acknowledgement made the advisory committee members feel seen.

Table 1: Shape Monash submissions

Comment received	Council response	Amendments
<p>Dear Friends, In recent years the promotion of gambling has become a factor of everyday life- it is difficult to avoid the issue. Gambling promotion is clearly succeeding and the community is accepting the end result ie gambling is O.K. BUT WE ALL KNOW IT IS NOT O.K. A significant number of our citizens are unable to resist the temptation to have a "flutter" to the extent that their lives are sacrificed. This fact cannot be shrugged off! I recommend Council STOP approving venues who wish to instal gambling equipment which brings such social harm to our society.</p>	<p>Noted. Council will continue to advocate against and reject applications for new Electronic Gambling Machines (EGMs) where net community (including social) harm is expected to be an outcome.</p>	
<p>Well done and balanced wrt policy.</p> <p>More power to you for not being 'sucked in' to the temptation of 'easy money'.</p>	<p>Noted.</p>	
<p>I particularly support:</p> <p>Council rejects 'responsible gambling' rhetoric.</p>	<p>Noted.</p>	
<p>I particularly support:</p> <p>Recognition that the harm and detrimental public health impacts that occur via the operation of EGMs by not-for-profit gaming machine operators significantly outweighs any community grant allocation or donation returned by these operators to the community.</p>	<p>Noted.</p>	
<p>I particularly support:</p> <p>Council can lead by example by not taking direct contributions from the gambling industry,</p>	<p>Noted.</p>	

<p>I particularly support:</p> <p>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.</p>	<p>Noted.</p>	
<p>I particularly support:</p> <p>Council will not support any application for EGMs on Council owned or managed land</p>	<p>Noted.</p>	
<p>I don't have a comment on the policy at this stage. I am keen on all measures to prevent gambling impact on vulnerable people. I would like to participate in any capacity towards this goal.</p>	<p>Noted.</p>	
<p>I support every single thing you can do to remove poker machines from service. If not, at least limit their hours of operation dramatically.</p> <p>They currently provide nearly 15% of the state government's revenue, which is an appalling figure. Daniel Andrews should be ashamed.</p> <p>It's literally the rich stealing from the poor via an extremely addictive product.</p>	<p>Noted. As mentioned in the draft policy, Council will advocate for the reduction in opening hours of pokies rooms to midnight – 10am to help reduce gambling harm after dark.</p>	
<p>I support the draft Gambling Harm Policy</p>	<p>Noted.</p>	
<p>I strongly support the Council in attempting to reduce the harm caused by gambling in our communities.</p> <p>The current policy does not go far enough and should not approve any new gaming licences or transfers unless they are subject to at a minimum the points listed as advocacy priorities in 2.2, in particular that no EGM should be approved with a maximum bet >\$1 per spin. While I applaud the Council continuing to advocate on these issues, we need to role model this here and protect our communities.</p>	<p>Noted. Authority to subject venues to maximum bet limits sits with the Victorian Gambling and Casino Control Commission (VGCCC), Council commits to advocating to the VGCCC to enforce all advocacy points listed in policy statement 2.2.</p>	

<p>I would also like to see Council reporting on the profits generated by gaming activities conducted within the Council area in addition to expenditure. Ideally this would be available statewide but again we need to lead within our sphere of influence.</p>	<p>Noted. Data that is required to be reported to the VGCCC is player loss data or expenditure data. Council reports expenditure data as it is an accurate depiction of the financial harm experienced within our community as a result of EGMs.</p>	
<p>I strongly support any and all initiatives the Council takes to reduce the harm caused by gambling in our communities</p>	<p>Noted.</p>	
<p>There is a conflict of interest for any sporting club that wants to provide a positive contribution to the local community while advertising an association to both venue's with EGM's and online sports betting companies.</p> <p>Sporting clubs have always provided a positive contribution to communities. Local harm associated with gambling is at odds with what sporting clubs are trying to achieve. The contribution any venue with EGM's are willing to contribute to local sporting clubs is tiny compared to the profit and harm that the EGM's create in the local community.</p> <p>Preventing clubs from advertising venue's with EGM's may be seen as a negative in the short term but in the long term it will benefit the clubs.</p> <p>Younger sports players and supporters are no longer blindly loyal to teams and are more likely to support individual players or clubs whose ethics align with their individual's belief.</p> <p>Professional AFL clubs are recognising this and are less likely to accept sponsors by ethically questionable companies due to the implications it may have from supporters and other potential sponsors.</p> <p>Professional clubs are also racing to diversify investment away from EGM's as the association reflects poorly on the club.</p>	<p>Noted.</p>	

<p>Young people are recognising the harm associated with betting and gambling and it's important for sports clubs to do the same.</p> <p>Sports clubs have an opportunity as does council to provide positive environments for people to feel safe and happy.</p> <p>Promoting a venue who has contributed to harm in the local community would reflect poorly on clubs.</p> <p>The policy provides a strong commitment by council to continue to create positive environments in sporting clubs in the City of Monash.</p>		
<p>The ability to be stronger in setting up City of Monash as a sector leader. As the closest level of government to your local community, Monash is best placed to understand the effects of gambling and to limit the negative impacts of gambling.</p>	<p>Noted, amendment recommended.</p>	<p>Additional sentence added to the Context section (p4) <i>'As the closest level of government to the community, Council is best placed to understand the effects of gambling and to limit the negative impacts of gambling on our community.'</i></p>
<p>Being aware of the current level of influence from Local Government in relation to community benefit allocations and its importance within a council gambling policy. Currently this is a large focus of the policy context, one that currently impacts 5/15 venues in the City of Monash.</p>	<p>Noted.</p>	
<p>Recognising that gambling is currently a legal form of recreation, whilst still outlining the considered concern that this causes.</p>	<p>Noted. Amendment recommended.</p>	<p>Additional sentence added to the Scope of the Policy section (p6) <i>"Gambling has been categorised as a legal form of recreation, however, as the closest level of government to</i></p>

		<i>community, Council sees the significant harm gambling causes within the community.”</i>
Victorian Local Government councils do not have the opportunity to oppose the transfer of Electronic Gaming Machine Entitlements through the VGCCC Entitlements Transfer Register.	Noted. Council will oppose transfers of EGMs if it is deemed new machines will have a net detriment to the community. Council recognises the avenue to oppose the transfer of machines is not through the VGCCC but through media / community. Amendment recommended.	Removed ‘to the VGCCC’ from statement 1.2 (p8). 1.2 Council will oppose applications 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.
(it will be important to) Having in place a clear process to transition user groups to achieve compliance with policy priority 1.5. Being aware of the steps to remove tenants from Council facilities if required.	Noted.	

Community Satisfaction Survey results

As part of the annual Community Satisfaction Survey (conducted 1 April – 20 May 2022), 800 residents were surveyed via telephone. Respondents were asked to rate from zero (very unimportant) to 10 (very important), how important it is to them that Council should engage in three actions in relation to gambling policy. On average, respondents considered it extremely important that Council engage in all three of these actions, with each question scoring 8.23 or above, actions included:

- Protect children, young people, and vulnerable members of our community from gambling harm by not allowing gambling advertisements or promotions on Council land including sports ovals, community spaces and recreation centres (8.53);
- Continue to protect our most vulnerable communities against any detrimental social, economic, and health impacts of any new electronic gaming machine (pokies) applications (8.27);
- Continue to advocate for regulatory reform to prevent the harms to public health from gambling / pokies and promote harm minimisation strategies (8.23).