

HOBSONS
BAY CITY
COUNCIL



Gambling Harm Prevention Policy Statement

September 2023

Acknowledgment of Country

Council acknowledges the Bunurong People of the Kulin Nation as the Traditional Owners of these municipal lands and waterways, and pay our respects to Elders past, present and emerging.

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1. Introduction

Through research and stories of lived experience, we know that gambling products can cause harm to individuals, families and local communities. Harm from gambling occurs across multiple 'domains', and can affect financial security, physical and mental health, work and study performance, and personal relationships, including the incidence or escalation of family violence.¹ While some gambling is not harmful, research indicates that the overall social costs of gambling activities may outweigh the benefits.² Research has also shown the impacts of gambling harm are unevenly spread, disproportionately affecting vulnerable groups and locations.³

In Hobsons Bay, electronic gaming machines (EGMs) have contributed to gambling harm over many years. Since their introduction in 1992, more than \$1.2 billion has been lost in Hobsons Bay, with research indicating that more than 40 per cent of regular (monthly) EGM users experience some level of harm.⁴ More recently, online gambling products has become a more prominent source of harm, with state-wide losses reaching an estimated \$2.6 billion in 2022-23, an increase of 50 per cent since 2019-20. Local data is not available for online gambling, but it is likely that Hobsons Bay residents have experienced similar trends.

These losses (and related harms) are caused by products that are developed, operated and promoted by a sophisticated, well-resourced and increasingly powerful gambling industry. In response, Council's Gambling Harm Prevention Policy Statement adopts a comprehensive public health approach to addressing gambling harm in Hobsons Bay.

This approach focuses on the prevention of gambling harm by addressing harmful products, environments and promotion, not just the individual behaviours of people experiencing or at risk of gambling harm. In doing so, it seeks to counter the tactics and influence of the gambling industry and address the underlying 'determinants of gambling harm' that shape individual behaviour, including a range of sociocultural, environmental, commercial, and political factors.

Through this Policy Statement, Hobsons Bay City Council affirms its commitment to a comprehensive public health approach to preventing harm from gambling. This approach is consistent with Council's role to protect, improve and promote public health and wellbeing, as required under the *Public Health and Wellbeing Act 2008*.

¹ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T (2016) *Assessing gambling-related harm in Victoria: a public health perspective*, Victorian Responsible Gambling Foundation, Melbourne. Accessed March 2023.

² Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M (2017) *The social cost of gambling to Victoria*, Victorian Responsible Gambling Foundation, Melbourne. Accessed March 2023.

³ Armstrong, A., & Carroll, M. (2017) *Gambling activity in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies. Accessed March 2023.

⁴ Ibid.

2. Purpose and scope

The purpose of this Policy Statement is to guide Council's efforts to prevent harm from gambling in Hobsons Bay. It specifically aims to prevent harm from EGMs and online gambling as much as possible, and within the scope of Council's roles and responsibilities. These include advocacy for legislative and regulatory reform and through Council's land use planning role in developing policy and assessing EGM-related planning applications.

Research indicates that EGMs and online gambling are amongst the most harmful forms of gambling and have the greatest impact on our community (see Section 3).⁵ Other harmful gambling products (such as casino table games and private betting) are out of scope for this Policy Statement, as are less harmful products (such as bingo, instant scratch tickets and lotteries).

The priority areas and commitments presented in this Policy Statement are informed by academic research, extensive community and stakeholder engagement, and an understanding of Council's roles and responsibilities. They represent Council's commitment to a comprehensive public health approach, while also informing Council's land use planning role. The Policy Statement also recognises Council's more limited role in preventing harm from online gambling, which is focussed primarily on advocacy, raising community awareness, promoting support services, and monitoring data and research.

This Policy Statement replaces Council's Problem Gambling (Electronic Gaming Machine) Policy Statement 2015.

3. Context

Overview of health and wellbeing impacts of gambling harm

Research has found that harm from gambling occurs across several domains, including relationships, health, psychological wellbeing and financial security.⁶ Varying levels of harm are experienced across the population, including for low-risk and moderate-risk gamblers.⁷ Research has found that 85 per cent of the total harm from gambling in Victoria arises from low-risk gambling and moderate-risk gambling.⁸

Harm from gambling is experienced not only by individuals, but also by families, friends, workplaces, and local communities. At an individual level, gambling harm is known to

⁵ Ibid.

⁶ Browne et al (2017). Accessed March 2023.

⁷ The Problem Gambling Severity Index (PGSI) measures the severity of gambling harm. It uses the following categories:

- Non-problem gambler – gambles with no negative consequences.
- Low-risk gambler – experiences a low level of problems with few or no identified negative consequences.
- Moderate-risk gambler – experiences a moderate level of problems leading to some negative consequences.
- Problem gambler – gambles with negative consequences and a possible loss of control.

This Policy Statement avoids using the term 'problem gambler' as it reinforces stigma experienced by people experiencing gambling harm. However, it follows the PSGI framework that the risk and experience of gambling harm is not uniform and occurs with varying levels of severity. See Victorian Responsible Gambling Foundation (n.d.) *Problem Gambling Severity Index*, <https://responsiblegambling.vic.gov.au/for-professionals/health-and-community-professionals/problem-gambling-severity-index-pgsi>

⁸ Miller, H. (2017) Hidden harm: Low-risk and moderate-risk gambling, Victorian Responsible Gambling Foundation, Melbourne – accessed March 2023.

exacerbate and contribute to other issues such as mental ill-health, use of alcohol, tobacco and other drugs, family violence and homelessness.⁹ At the population level, the estimated cost to Victorian communities has been estimated at \$7 billion for 2014-15, which includes the costs to our governments, local communities, businesses, families and the individual.¹⁰

Higher availability and accessibility of gambling venues and products contribute to increased harm. For example, data and research show that locations with higher numbers of EGMs generally experience higher losses¹¹ and research has also linked a higher concentration of EGMs to higher rates of family violence (see Appendix 1 for details of Gender Impact Assessment undertaken to inform this Policy Statement).¹² Availability and access to EGMs is also a key factor that normalises gambling in local communities, particularly for vulnerable groups such as children and young people.¹³

Research also indicates that some groups in our community are more likely to experience harm from gambling. Compared to people who do not experience harm from gambling, the following groups are significantly over-represented amongst those who do experience harm: men, people aged 18-29, First Nations people, people who are unemployed or not employed, as well as people who are single, renting, living in stressed communities, and living on low incomes or receiving income support payments.¹⁴ Research and lived experience also suggests that returning service people are more vulnerable to gambling harm.¹⁵ More generally, social and personal factors such as mental ill-health, social isolation, financial insecurity, mortgage stress, and socio-economic disadvantage all increase the risk of experiencing gambling harm.¹⁶

Gambling in Hobsons Bay

Table 1 shows the proportion of regular (monthly) gamblers who are exposed to risk from different gambling products. The highest risk products include poker (46.3% of participants at risk of harm), casino table games (44.7%), private betting (43.4%), EGMs (41.5%), race betting (41.4% and sports betting (40.7%). Other gambling products are less likely to cause harm.

This Policy Statement will focus specifically on preventing harm from EGMs and online gambling, which includes race and sports betting. These will be prioritised as they are

⁹ Ibid.

¹⁰ Browne et al (2017). Accessed March 2023.

¹¹ Victorian Gambling and Casino Control Commission (n.d.) Gambling expenditure data, <https://www.vgccc.vic.gov.au/resources/information-and-data/expenditure-data> - accessed February 2023.

¹² 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 & Medicine*, 1–9. <http://doi.org/10.1016/j.socscimed.2016.06.008> - accessed February 2023.

¹³ Bestman, A., Thomas, S., Randle, M. and Pitt, H. (2017) 'Children's attitudes towards Electronic Gambling Machines: an exploratory qualitative study of children who attend community clubs', *Harm Reduction Journal*, 14:20, <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-017-0148-z> - accessed February 2023.

¹⁴ Armstrong & Carroll (2017). Accessed February 2023.

¹⁵ Cowlshaw et al (2021) *Gambling problems among Australian military personnel after deployment: analyses of the Middle East Area of Operations (MEAO) Prospective Health Study*, Victorian Responsible Gambling Foundation; Metcalf et al (2022) *Gambling problems, risk factors, and implications in Australian veterans*, Victorian Responsible Gambling Foundation.

¹⁶ Rintoul, A., & Deblaquiere, J. (2019) *Gambling in Suburban Australia (Research Report)*, Melbourne: Australian Institute of Family Studies. Accessed February 2023.

higher risk products, but also due to the scale of the losses in Hobsons Bay and Council's capacity to influence outcomes, particularly for EGMs.

Table 1: Regular (monthly) gamblers at risk of harm by gambling product (adapted from Armstrong, 2017)

	Lottery	Instant scratch tickets	EGMs	Race betting	Sports betting	Keno	Casino table games	Bingo	Private Betting	Poker
Any risk (%)	13.2	18.2	41.5	41.4	40.7	32.6	44.7	31.5	43.4	46.3
Severe and moderate risk (%)	6.1	10.3	23.3	21.9	23.4	19.9	30.0	11.9	26.7	39.4

Electronic Gaming Machines

In 2022-23, \$47.95 million was lost on EGMs in Hobsons Bay at an average rate of \$131,371 per day, the highest losses recorded since 2011-12 (see Table 2).¹⁷ This represented a 1.5 per cent increase on the average daily losses from 2021-22. Additionally, an average of \$444 was lost per adult in Hobsons Bay during 2021-22, which is the 11th highest per adult in Greater Melbourne. Notably, an estimated \$45 million has been saved on EGMs in Hobsons Bay in recent years due to the closure of gaming venues arising from COVID-19 health restrictions.

Table 2: Losses (and estimated savings) from EGMs in Hobsons Bay, 2018-19 to 2022-23

Year	Total Losses (\$)	Daily (\$)	Estimated savings during COVID-19 restrictions (\$)
2022-23	47,950,389 (open 365 days)	131,371	n/a
2021-22	34,829,849 (open 269 days)	129,479	12,006,869 (closed 96 days)
2020-21	25,889,811 (open 207 days)	125,072	20,558,805 (closed 158 days)
2019-20	34,611,659 (open 266 days)	130,119	12,888,486 (closed 100 days)
2018-19	47,042,974	128,885	n/a

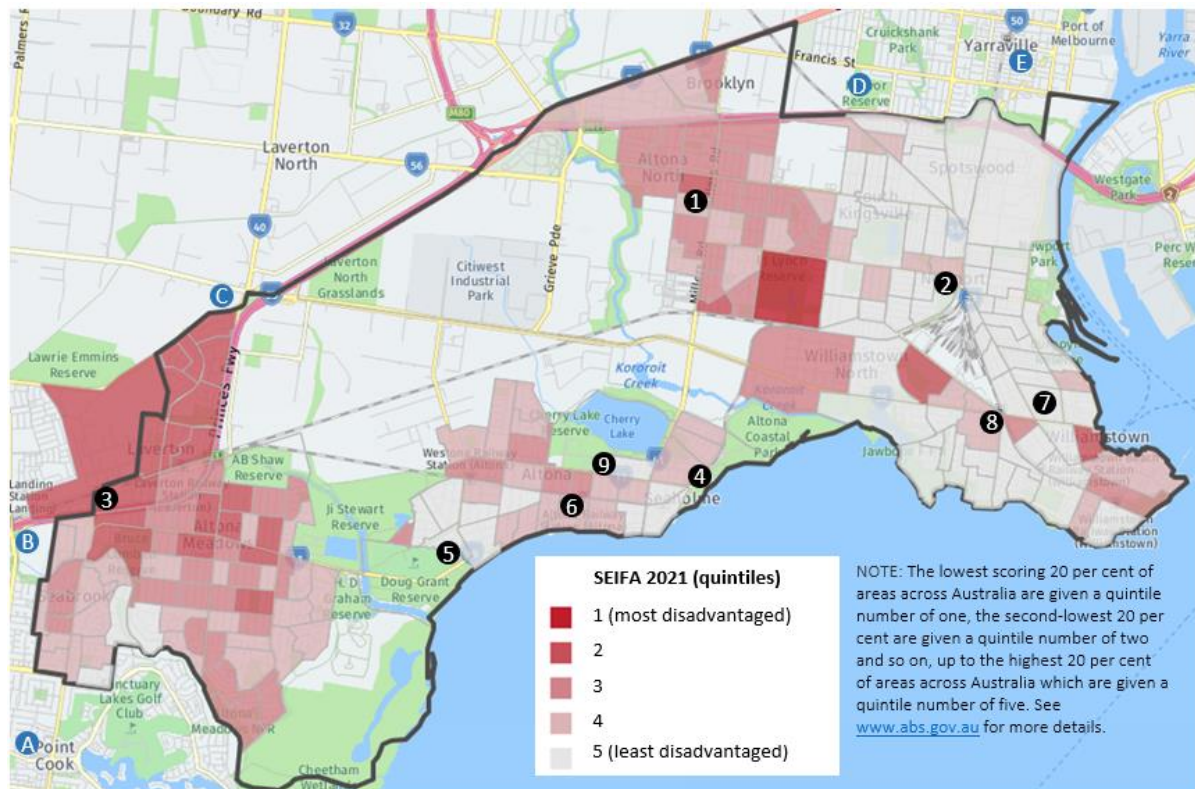
There are currently 535 EGMs operating in Hobsons Bay across nine venues (see Figure 1). In 2017, the Victorian Government set Hobsons Bay's municipal cap at 577 EGMs. Therefore, there is capacity for growth in the number EGMs in Hobsons Bay.¹⁸ The current number represents a density of 6.9 EGMs per 1,000 adults, which is the equal third highest in Greater Melbourne. Research indicates that around 14 per cent of Victorian adults use

¹⁷ Public health restrictions arising from the COVID-19 pandemic led to the closure of gaming venues during the 2019-20, 2020-21 and 2021-22 financial years. As such, average daily loss figures are used to enable comparisons over time.

¹⁸ Victorian Gambling and Casino Control Commission (n.d.) Gaming machine regional caps and limits, <https://www.vgcc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/caps-and-limits/gaming-machine> - accessed February 2023.

EGMs, which puts the losses per EGM user in Hobsons Bay during 2022-23 at approximately \$4,750.¹⁹

In 2022-23, more than half of EGMs losses in Hobsons Bay occurred in three venues: Millers Inn Hotel (located in Altona North), Newport Social Club (Newport) and Club Laverton (Laverton). Combined, these venues attracted \$28.33 million (59.1%) of the \$47.95 million lost. The Millers Inn Hotel (\$13.9 million) had the highest losses at an average rate of \$38,218 per day, with each of their 70 EGMs generating an average of \$199,284 for the year. Appendix 2 presents the EGM losses at each venue (by total and average per day) over the past three years.



No.	Name	No.	Name	No.	Name
1	Millers Inn	6	Altona RSL	A	Sanctuary Lakes Hotel
2	Seagull's Nest	7	The Vic Inn	B	Phoenix Hotel
3	Club Laverton	8	Rifle Club Hotel	C	Westside Taverner
4	Altona Sports Club	9	Altona Bowling Club	D	Yarraville-Footscray Bowling Club
5	Koorungal Golf Club			E	Yarraville Club

Figure 1: Gaming venues in and around Hobsons Bay

¹⁹ 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.

Online gambling

There has been a substantial increase in spending on online gambling in Victoria in recent years (see Table 3). Data published by the State Revenue Office shows that estimated losses from sport and race betting increased from \$1.65 billion in 2019-20 to \$2.58 billion in 2021-22, an increase of more than 50 per cent in two years.²⁰ Losses have remained at similar levels in 2022-23. Although data from online gambling is not available at a local level, it is likely that these trends also occurred in Hobsons Bay. The COVID-19 pandemic contributed to this rapid growth, supported by significant spending by the gambling industry on advertising, which saw an average of 948 gambling ads broadcast daily on Victorian free-to-air television in 2021.²¹

Table 3: Losses from online gambling in Victoria, 2019-20 to 2022-23

Year	Losses (\$ millions)	% change (on previous year)
2022-23	2,600.0	0.9%
2021-22	2,578.0	10.6%
2020-21	2,330.6	39.6%
2019-20	1,669.4	n/a

Vulnerable groups in Hobsons Bay

As noted previously, research indicates that some groups are more likely to experience harm from gambling than others. In Hobsons Bay, these groups make up a substantial proportion of the population, including²²:

- Older people (aged 60+), who make up 21.9 per cent of the population
- People aged 18 to 34, who make up 20.5 per cent of the population
- People born overseas, who make up 30.1 per cent of the population
- People with a disability, who make up 17 per cent of the population.²³

Research also identified indicators of risk that may increase the potential for gambling harm. In Hobsons Bay, the following population groups may be at higher risk of experiencing gambling harm:

²⁰ Victorian Responsible Gambling Foundation (n.d.) Expenditure on gambling in Victoria, <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/expenditure-on-gambling-victoria-and-australia>, accessed February 2023.

²¹ Victorian Responsible Gambling Foundation, (n.d.) 948 gambling ads daily on Victorian free to air TV in 2021, <https://responsiblegambling.vic.gov.au/about-us/news-and-media/948-gambling-ads-daily-on-victorian-free-to-air-tv-in-2021/> - accessed February 2023.

²² Unless otherwise noted, all data is sourced from the 2021 Census of Population and Housing - see .id informed decisions (n.d.) *Hobsons Bay City - Community Profile*, .id community demographic resources, <https://profile.id.com.au/hobsons-bay/service-age-groups>

²³ Estimate based on *Australian Bureau of Statistics (2018) Disability, Ageing and Carers, Australia: Summary of Findings*, <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings> - accessed February 2023.

- Unemployed adults, who make up 3.5% of the population, with the rate higher in some neighbourhoods²⁴
- People living in rental properties, who make up 28.4 per cent of households
- Households experiencing rental stress, which make up 24.1 per cent of households living in private rental accommodation²⁵
- Households in the lowest group for equivalised household income (\$0 to \$602 per week), which make up 23.2 per cent of households
- First nations people, who make up 0.7 per cent (628 persons) of the population in Hobsons Bay, the same proportion as for Greater Melbourne.
- Households living in Laverton, Altona North, Altona Meadows and Brooklyn, who are more likely to face social and financial disadvantage according to the Socio-Economic Indexes for Areas (SEIFA) Index of Relative Disadvantage.

Land use considerations

Figure 1 displays the location of the nine gaming venues located in Hobsons Bay, including their spatial relationship to areas of socioeconomic disadvantage. Notably, two of the highest loss venues in Hobsons Bay (Millers Inn and Club Laverton) are in areas of relative socioeconomic disadvantage. There are a further five gaming venues within 2.5 kilometres of Hobsons Bay's municipal borders. Research has shown that people who use EGMs typically travel up to 2.5 kilometres to access a gaming venue.²⁶ Further detail on gaming venues in Hobsons Bay is provided in Appendix 2.

The positioning of venues in convenient locations can facilitate the likelihood of gambling harm. Historically, hotels and clubs with EGMs have been in or around activity centres or near local shopping areas. By increasing their visibility, these venues make gambling products more convenient and accessible to the community.

There are a range of other land use factors that contribute to the risk and experience of gambling harm. It should be noted that these factors are considered when Council assesses any planning permit applications in relation to EGMs. Key factors include:

- **Location** - the location of gaming venues in convenient and accessible locations can increase the likelihood of people using EGMs and may contribute to the risk and experience of gambling harm. Key factors include current traffic, public transport and pedestrian routes; surrounding land uses; population likely to travel to the area; and existing EGM venues, non-gaming entertainment and other areas where people congregate.
- **Design and operation** – the design and operation of gaming venues and EGMs may contribute to the risk and experience of gambling harm. Key factors include visibility of EGMs from other parts of the venue, placement of EGMs near to toilets, bars and other amenities; lack of natural light; and the provision of inducements to gamble such as raffles, free tickets, cheaper alcohol and food, giveaways and awards/gifts.

²⁴ Jobs and Skills Australia, (n.d.) Small Area Labour Markets, <https://www.jobsandskills.gov.au/work/small-area-labour-markets> - accessed February 2023

²⁵ Housing id, (n.d.) Hobsons Bay City Housing Monitor, <https://housing.id.com.au/hobsons-bay> - accessed February 2023.

²⁶ Centre for Gambling Research (2004). *Survey of gambling prevalence in Victoria*. ACT: Australian National University.

- **Alternative entertainment** – people experiencing gambling harm often see EGMs as a social activity. In particular, clubs may become the main social outlet for people who are lonely or isolated in the community. A range of gambling and non-gambling entertainment options should be provided within local communities.

These (and other) factors are considered by Council when assessing planning permit applications against Clause 52.28 of the Hobsons Bay Planning Scheme (see Appendix 3). Additionally, a Social Impact Assessment must be submitted with any planning permit application to establish a new gaming venue, increase the number of EGMs at an existing venue, or transfer EGMs between two venues in Hobsons Bay.²⁷

The Schedule to Clause 52.28 specifies shopping complexes and strip shopping centres where EGMs are prohibited. This list was most recently updated through Amendment C131 (Updated Planning Scheme & New Residential Zones), which came into effect in February 2022. Through this Policy Statement, the list will continue to be reviewed and updated to ensure it specifies all relevant locations where EGMs are prohibited (see Commitment 2.5). Consideration will be given to the activity centres identified in Council's Activity Centre Strategy which range from 'microcentres' (which typically comprise a few shops providing simple convenience shopping and other needs) to 'Major Activity Centres' (which provide a wide range of goods and services).

The schedule also states that gaming venues and machines should be located outside areas that have been identified as Strategic Redevelopment Areas (SRAs). SRAs include precincts identified for rezoning through Council's Industrial Land Management (ILMS) Strategy 2008. The 2008 ILMS is currently undergoing a review and many former SRAs have been rezoned with new planning controls applied. This includes Precinct 15 which is controlled by the Altona North Comprehensive Development Plan (Schedule 2 to Clause 37.02). This Policy Statement aims to ensure that EGMs continue to be prohibited in these locations (former SRAs) as appropriate, and in line with the objectives set out in the Schedule to Clause 52.28.

4. Roles and responsibilities

The responsibility for preventing harm from gambling is shared across all levels of government, and within several non-government organisations.

Commonwealth Government

The Commonwealth Government is responsible for regulating the provision and advertising of online gambling. The *Interactive Gambling Act 2001* establishes a framework for the provision and advertising of online (and telephone) gambling services in Australia.²⁸ The Act makes it illegal for gambling companies to offer some services in Australia, including online casinos, in-play sports betting, and betting on the outcome of a lottery.

²⁷ Hobsons Bay City Council (2022) *Electronic Gaming Machines - Social Impact Assessment Guidelines*, <https://www.hobsonsbay.vic.gov.au/Council/Strategy-Planning/Social-policy-planning/Social-Impact-Assessment-Guidelines> - accessed March 2023.

²⁸ Australian Communications and Media Authority (n.d.) *About the Interactive Gambling Act*, <https://www.acma.gov.au/about-interactive-gambling-act> – accessed February 2023.

In 2018, the Commonwealth Government released the National Consumer Protection Framework for Online Wagering. The Framework introduces a range of harm reduction measures for online gambling such as a voluntary pre-commitment system, prohibition on the promotion of payday lending and small loan providers on gambling websites and apps, and restrictions on the types of inducements that online gambling providers can offer.

In 2018, the Commonwealth Government also introduced the *Broadcasting Services (Online Content Service Provider Rules) 2018*, which banned gambling advertising during live sport that is streamed online between 5am and 8.30pm. These reforms brought online services in line with television and radio broadcasting systems. Despite these changes, the number of gambling ads continues to increase, with a 2022 survey finding that 71 per cent of respondents support a ban on gambling ads on television.²⁹ Most recently, the Commonwealth Government introduced changes to advertising regulations in late 2022, which require online gambling companies to replace the 'gamble responsibly' messaging with a range of new taglines.

In June 2023, the House of Representatives Standing Committee on Social Policy and Legal Affairs published its report from the Inquiry into Online Gambling and its impacts on those experiencing gambling harm.³⁰ The Inquiry received 161 submissions (including one from Hobsons Bay), 26 exhibits and 13 public hearings. The report included 31 recommendations, including that the Australian Government:

- with the states and territories, develop a comprehensive national strategy on online gambling harm reduction (Recommendation 2)
- with the cooperation of the states and territories, establish national regulation and a national online gambling regulator (Recommendation 3)
- work with the Australian Banking Association to develop a set of minimum gambling consumer protection standards for implementation by all banks (Recommendation 13).
- prohibit all online gambling inducements and inducement advertising, and that it do so without delay (Recommendation 16)
- with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, to be introduced in four phases, over three years, commencing immediately (Recommendation 26).

Victorian Government

The Victorian Government is responsible for the regulation of EGMs in Victoria. The *Gambling Regulation Act 2003* governs the operation of EGMs and other gambling products. The Act sets out the responsible Minister's authority to set the maximum allowable number of EGMs in the state (s.3.2.3); regional and municipal caps (s.3.2.4); responsible gambling measures (s.3.4.29-33a); taxes and levies; community benefit statements for club venues (s.3.6.9) and the community support fund for hotels (s.3.6.12).

²⁹ The Australia Institute (2022) 'Polling – Advertising on TV', <https://australiainstitute.org.au/post/polling-research-give-junk-food-gambling-ads-the-punt> - accessed February 2023.

³⁰ Standing Committee on Social policy and Legal Affairs (2023) *You win some, you lose more: Online gambling and its impacts on those experiencing gambling harm*, Parliament of Australia, Canberra, June 2023.

Under the Act, hotels operating EGMs contribute 8.33 per cent of net gaming revenue to the Community Support Fund, with a total of \$147 million contributed in 2018-19.³¹ The Community Support Fund provides ongoing operational funding to the Victorian Responsible Gambling Foundation (\$41 million in 2018-19) which is a statutory authority created by Victorian Parliament to prevent gambling harm.³²

Club venues operating EGMs are required to provide community benefit to the value or 8.33 per cent of annual net gaming revenue. Each club is required to provide an audited community benefits statement in return for an 8.33 per cent discount on taxes related to the operation of EGMs. The Victorian Government also collects a 'Point of Consumption' tax (currently set at 10 per cent) of the net revenue derived from all online gambling customers located in Victoria.

In July 2023, the Victorian Government announced a package of reforms that aim to reduce harm from EGMs, including:

- Mandatory pre-commitment – all EGMs in Victoria will require 'carded play' (i.e. no cash) and all users will be required to set time and money limits
- Operating hours – from mid-2024, mandatory closure periods will be enforced in all gaming machine areas (except the casino) from 4am to 10am
- Load up limits – the sum of money that can be put into an EGM at one time will be capped at \$100 (down from \$1,000)
- Spin times – all new EGMs will be required to 'spin' at a rate of three seconds per game (up from 2.1 seconds).

Additionally, from mid-2024 the Victorian Gambling and Casino Control Commission (VGCCC) will assume a larger role in gambling harm minimisation, taking over most of the functions of the Victorian Responsible Gambling Foundation. Except for operating hours, no timeframes have been provided for the measures announced by the Victorian Government.

The Victorian Government also oversees the land-use planning system in Victoria. The *Planning and Environment Act 1987* establishes the framework for planning the use, development and protection of land in Victoria. Clause 52.28 (Gaming) of the Hobsons Bay Planning Scheme sets out the statewide requirements to be considered in the assessment of planning permit applications in relation to EGMs. The Schedule to Clause 52.28 outlines further matters for consideration in the assessment of applications in Hobsons Bay, including location, venue design and application requirements.

The Victorian Government also oversees the administration of the *Public Health and Wellbeing Act 2008*. Under the Act, the function of a Council is to 'seek to protect, improve and promote public health and wellbeing within the municipal district'. The Act requires Councils to prepare a municipal public health and wellbeing plan, which identifies goals and strategies for creating local communities where people can achieve maximum health

³¹ Victorian Government (2019) *Community Support Fund Financial Overview 2018-19*, <https://www.dtf.vic.gov.au/community-support-fund/community-support-fund-financial-overview-2018-19>, accessed February 2023.

³² Victorian Responsible Gambling Foundation (2022) *Our Annual Report 2021-22*, <https://responsiblegambling.vic.gov.au/about-us/annual-report>, accessed February 2023.

and wellbeing. Council's current Municipal Public Health and Wellbeing Plan is incorporated into the Council Plan 2021-25.

Local Government

Council can play various roles in seeking to prevent harm from gambling. Council will continue to work through the following roles in its efforts to prevent harm from gambling in Hobsons Bay:

- **Leadership and advocacy** – Council plays a key leadership role in promoting the health and wellbeing of our community. This extends to advocacy to the Commonwealth and Victorian Governments to introduce evidence-based harm prevention measures to protect local communities from gambling harm.
- **Planning and regulation** – Council can influence the location of EGMs in local communities through its role in assessing planning permit applications and developing and updating policies in the Hobsons Bay Planning Scheme. It may also oppose gaming licence applications that do not demonstrate net community benefit.
- **Providing resources and facilities** – Council supports a wide range of local organisations by providing resources (such as grants and other funding) and facilities (such as community centres and sports grounds). These resources and facilities contribute to healthy communities and a range of alternatives to gambling activities and venues.
- **Research and data** – Council monitors data and supports local research to identify emerging trends and to inform its decision-making and advocacy. It can also promote key findings to continue to 'change the narrative' around gambling harm toward a comprehensive public health approach.
- **Activities and promotion** – Council delivers a range of activities that provide alternatives to gambling, both online and through Council facilities. It also promotes other community activities, as well as Gamblers Help and other support services.

Other key stakeholders

There are several stakeholders that Council works with to prevent harm from gambling. For almost a decade, Council has been a Leadership Council with the Alliance for Gambling Reform, a national advocacy organisation with over 60 member organisations. The Alliance advocates to state and federal governments for reform of the gambling industry and to implement evidence-based and public health-focussed harm prevention measures.

As a member of the Victorian Local Governance Association (VLGA), Council also participates in the Local Government Working Group on Gambling, as a part of the VLGA's project on Building Capacity in Councils and Gambling. The Municipal Association of Victoria also has an interest in preventing gambling harm, which is addressed through its Alcohol, Drugs and Gambling forum.

Council also regularly engages with academics and research bodies, including members of Deakin University's Institute for Health Transformation and Monash University's School of Public Health and Preventative Medicine. These institutions are leading research on public health approaches to preventing gambling harm and have strict policies against taking funding from the gambling industry for their work.

The Victorian Responsible Gambling Foundation (VRGF) is a statutory authority that addresses gambling harm in Victoria. The VRGF funds support services such as Gamblers

Help and provides extensive research and data support, as well as preventative and educational programs such as [Libraries After Dark](#) and the [ReSPIN Program](#). In July 2023, the Victorian Government announced that most of the functions of the VRGF would be transferred to the VGCCC from July 2024.

The VGCCC commenced operations in July 2022 with a commitment to minimising gambling harm; ensuring gambling activities are provided safely and fairly; and holding gambling operators to account against their social licence, not just regulatory obligations.³³ The Commission has also published a position statement on harm minimisation.³⁴ The statement includes seven principles which are consistent with a public health approach, including the following:

- Gambling causes harm (Principle 2) – recognises that harm occurs in ‘countless ways’, and that harm experienced by one person is not lessened by any associated benefits accruing to other people.
- Harm is preventable (Principle 4) – recognises that preventing harm involves community education and support; regulation and enforcement; and gambling providers acting responsibly.
- Gambling markets gravitate toward harmful offerings (Principle 5) – recognises that products and environments that make gambling more attractive can be expected to also make gambling more attractive.
- Gambling providers have a duty to care for the wellbeing of their customers and their communities (Principle 7) – recognises that gambling providers’ obligations extend beyond merely complying with the law, as they choose to provide gambling services and harm occurs despite education and regulation.

5. Community and stakeholder engagement

The following community and stakeholder engagement processes were undertaken to inform the development of this Policy Statement:

- Preliminary engagement (December 2022 to February 2023) – activities included community and stakeholder workshops, interviews, and an online community poll.
- Public consultation (May to June 2023) – the Draft Policy Statement was made available for public comment via Council’s Participate Hobsons Bay website.
- Gambling sponsorship survey (May to June 2023) – an online targeted survey was issued to local community organisations to understand the level and types of sponsorship provided by the gambling industry.

Feedback was provided by residents, service providers, local community organisations, sporting clubs, academics, Gamblers Help services, advocacy groups, local gaming venues, and people with lived experience of gambling harm.

The following key themes emerged from community and stakeholder engagement:

³³ Victorian Gambling and Casino Control Commission (2023) ‘Our position on harm minimisation’, <https://www.vgccc.vic.gov.au/our-position-harm-minimisation>, accessed July 2023.

³⁴ Ibid.

- **Gambling harm** – participants expressed concerns that gambling harms people in Hobsons Bay and that the impact can be underestimated or not discussed due to stigma.
- **Gambling industry** – participants expressed concerns about the practices and operation of the gambling industry, suggesting that it benefitted from harm and should be excluded from community settings and Council sites.
- **Advertising** – participants expressed concerns about the negative impact of gambling advertising and sponsorship in exposing children and other vulnerable groups to gambling products and venues.
- **Electronic gaming machines** – participants expressed concerns about the number of EGMs in Hobsons Bay and encouraged Council to use the levers available to reduce the number in the municipality.
- **Normalisation** – participants expressed concerns that gambling becomes more ‘normalised’ through exposure to gambling products in community settings and on land and assets owned or managed by Council.
- **Community support** – clubs operating EGMs highlighted their role in supporting local community groups, including through sponsorships, donations and in-kind support for local sporting clubs.
- **Sponsorships** – clubs operating EGMs indicated that the Draft Policy Statement could affect their capacity to support local community groups. Almost three-quarters of respondents to the gambling sponsorship survey had previously received a Council grant. Of these, two thirds (67%) had not received any support from the gambling industry, while 17 per cent had received sponsorships in the past twelve months. Additionally, almost half (47%) indicated that support and alternative resources are needed to consider or continue not accepting sponsorships.
- **Values** – community organisations indicated that values and ethics inform their decision to not engage with the gambling industry, particularly junior clubs. Almost half (47%) of respondents to the gambling sponsorship survey indicated that ethics and values were key factors in their decision to not accept support.

Gambling can have a huge impact on gamblers, their families, employer and sadly can be addictive. The ripple effect can be overwhelmingly harmful to the entire community.

I will not go to a venue with poker machines. I will not support the gambling industry which profits at the expense of the weak and vulnerable.

Advertisement for any form of gambling should be banned from all channels (TV, press, radio, billboards, stadiums).

I wholeheartedly support the approach from a sporting club perspective. As a junior only club, we have a policy against accepting any form of support or sponsorship from gambling related entities.

There has to be a limit to how much people can lose at gambling venues ... and while there is a limit on the number of machines a venue can have, it seems an excessive number of machines available in what I would consider to be a smallish area.

- **Advocacy** – feedback suggested that Council’s advocacy should focus on a range of key issues, including mandatory pre-commitment systems which require individuals to set time and spending limits, removing misleading EGM design features, restricting gambling advertising and sponsorship, reducing the number of EGMs, and reviewing the Community Benefits Scheme.

Overall, participants were supportive of the draft policy statement, with more than two-thirds of submissions providing positive feedback.

6. Comprehensive public health approach

Research and stories of lived experience show that gambling products cause harm to individuals, families and local communities. For many years, governments, regulators, academics, and support services have focused on changing individual behaviour to prevent harm. This approach has been reinforced through the language of ‘problem gamblers’ and ‘responsible gambling’.

Research has challenged the ‘individual responsibility’ approach for focussing too heavily on the actions of individuals, and diminishing the role of the gambling industry and harmful gambling products.³⁵ Perhaps most importantly, this approach has been ineffective in reducing harm, with EGM losses in Hobsons Bay reaching their highest point in more than a decade, alongside recent increases in online gambling in Victoria.



Figure 2: A comprehensive public health approach to preventing harm from gambling

Council’s Policy Statement adopts a comprehensive public health approach to addressing gambling harm. This approach is informed by research published by some of Australia’s

³⁵ Marko, S. et al (2023) ‘The impact of responsible gambling framing on people with lived experience of gambling harm’, *Frontiers in Sociology*, vol.8, [10.3389/fsoc.2023.1074773](https://doi.org/10.3389/fsoc.2023.1074773), accessed July 2023; Miller, H. et al (2018) ‘From problem people to addictive products: a qualitative study on rethinking gambling policy from the perspective of lived experience’, *Harm Reduction Journal*, [10.1186/s12954-018-0220-3](https://doi.org/10.1186/s12954-018-0220-3), accessed July 2023.

leading independent researchers, which provides the first definition of a comprehensive public health approach to preventing harm from gambling (see Figure 2).³⁶



Figure 3: Determinants of gambling harm (Source: Institute of Health Transformation, Deakin University)

Comprehensive public health approaches have been used to prevent harm from tobacco in Australia, including the introduction of plain packaging, health warnings on products, advertising bans, taxation, and banning smoking in public places.³⁷ There is a growing body of research to support public health approaches to preventing harm from gambling, with the VRGF, VGCC, academics, health promotion professionals, and numerous Councils adopting this approach in recent years.

A comprehensive public health approach recognises that health and wellbeing is shaped a range of factors which influence individual choices and behaviour. Various ‘determinants’ (see Figure 3) shape risk and potential for gambling harm, including:

- **Socio-cultural factors** – these factors include who we are, where we live, the way we grew up, and the social settings and norms that impacts our behaviour, e.g. age, gender, cultural background, socioeconomic disadvantage.
- **Environmental factors** – these factors include the accessibility, availability and promotion of gambling products, services, settings and resources that impact our behaviour, e.g. location of gaming venues, ease of access to gambling products, normalisation of gambling in community settings.
- **Commercial factors** – these factors include the economic relationships and transactions between the gambling industry, government and local communities, e.g. revenue generated by EGMs for gaming venue operators and state government, advertising of gambling products and venues, financial losses from gambling products, and sponsorships of local clubs and major sporting codes.

³⁶ Thomas, S. et al (2023) ‘Time for policies on gambling to benefit health – not the gambling industry’, *Health Promotion Journal of Australia*, <https://onlinelibrary.wiley.com/doi/10.1002/hpja.721>, accessed July 2023.

³⁷ Australian Government (n.d.) *Tobacco control*, <https://www.health.gov.au/topics/smoking-and-tobacco/tobacco-control> - accessed February 2023.

- **Political factors** – these factors include the interactions between governments, government agencies, the gambling industry, local communities and other stakeholders that may impact decision making, e.g. legislative and regulatory frameworks, political donations, industry lobby groups, advocacy from local government.

Each of the commitments presented in this Policy Statement address one or more of these determinants of gambling harm (see Appendix 4). This alignment ensures that Council's efforts remain grounded in a comprehensive public health approach that is supported by data and research. Importantly, this approach also highlights the need to advocate for 'independent (i.e. free from gambling industry influence) policies and strategies that seek to prioritise health and wellbeing'.

7. Priority areas

Council's Gambling Harm Prevention Policy Statement is built on six priority areas. This section outlines why Council is taking this approach and how it will aim to prevent harm from gambling through each priority area. Appendix 5 provides definitions of key terms used in commitments outlined below.

Priority Area One: Advocacy

Why is Council taking this approach?

State and federal governments can introduce harm prevention measures through legislation and regulation of EGMs and online gambling. However, regulation and legislation has been typically based on individual responsibility approaches to harm prevention such as voluntary self-exclusion schemes.

Applying a comprehensive public health approach, Council will advocate for evidence-based methods to prevent harm from EGMs and online gambling, including:

- reducing the number of EGMs in local communities
- a phased ban on gambling advertising and sponsorship
- removing harmful EGM design features such as 'losses disguised as wins'
- limiting opening hours of gaming venues to times that are least likely to cause harm
- effective and timely implementation of mandatory precommitment systems to set time and spending limits on gambling products and within gaming venues
- reviewing the Community Benefits Scheme applied to clubs operating EGMs
- extending regulation to 'loot boxes',³⁸ cryptocurrency and other potentially harmful products.

Council will advocate directly to state and federal governments, including by monitoring regulatory and legislative changes, participating in inquiries and publishing submissions. It

³⁸ Loot boxes involve 'microtransactions' that occur within online games that provide opportunities to acquire rewards, often purchased with real money. Research has identified that loot boxes apply the same psychological tactics that lead people to experience harm from EGMs – see Gallus, P. (2022) Unlocking loot boxes: gaming hype, or gambling-like?, <https://responsiblegambling.vic.gov.au/about-us/news-and-media/unlocking-loot-boxes-gaming-hype-or-gambling-like> - accessed March 2023.

will also work with its supporters and partners to support joint advocacy, media coverage and social media campaigns to call for more effective legislative protections and harm prevention measures to create safer environments for our residents.

How will Council do this?

To prevent harm from gambling, Council will:

1.1 Advocate to State and Federal Governments for the introduction and timely implementation of legislative and regulatory reform which prioritise health and wellbeing and protect local communities from gambling harm, free from gambling industry influence.

1.2 Support the Alliance for Gambling Reform, neighbouring Councils and other key partners to advocate for legislative and regulatory reform to protect local communities from gambling harm.

Priority Area Two: Availability and accessibility of EGMs in Hobsons Bay

Why is Council taking this approach?

We know that the availability and accessibility of EGMs in local communities contributes to the risk and experience of gambling harm. Locations with higher numbers of EGMs tend to experience higher losses. Additionally, increased exposure to EGMs in community settings normalises gambling in local communities, particularly for vulnerable groups such as children and young people.³⁹

Through its land-use planning role, Council applies the relevant provisions of the Hobsons Bay Planning Scheme when assessing planning permit applications relating to EGMs, including requiring the preparation of a Social Impact Assessments. Council may also oppose gaming licence⁴⁰ applications that do not demonstrate net community benefit.

Applying a comprehensive public health approach, Council will monitor and (where possible and appropriate) take steps to limit the number and location of EGMs in Hobsons Bay. At all times, Council will work within existing legislative and regulatory frameworks and be guided the impact on the health and wellbeing of local communities.

How will Council do this?

To prevent harm from gambling, Council will:

2.1 Oppose any gaming licence application for new gaming venues or additional EGMs in Hobsons Bay that do not provide net community benefit (as measured by an independent Social and Economic Impact Assessment). When Council opposes an application, it will adequately resource the representation at the Victorian

³⁹ Bestman et al (2017).

⁴⁰ Under the *Gambling Regulation Act 2003*, any owner of premises seeking to either be approved as suitable for gaming, or a venue operator seeking to amend its licence to increase the number of EGMs in an approved venue, must apply to the Victorian Gaming and Casino Control Commission for approval. Council has a total of 60 days from receiving the Commission's notification to make a submission, which should cover the economic and social impact of the proposed approval on surrounding Council districts. Further information is available at Victorian Gambling and Casino Control Commission (n.d.) *Hearings*, <https://www.vgccc.vic.gov.au/resources/hearings-and-decisions/hearings> - accessed February 2023.

Gambling and Casino Control Commission and subsequent representation at Victorian Civil and Administrative Tribunal hearings, if required.

2.2 Consider making a submission on any gaming licence application for a new gaming venue or additional EGMs within an existing venue where the venue is located in an adjacent municipality within 2.5 kilometres of the municipal border.

2.3 Explore opportunities to support gaming venues in Hobsons Bay who express an interest in reducing or removing their EGM entitlements.

2.4 Make decisions and provide advice relating to EGMs in accordance with this Policy Statement and the relevant provisions of the Hobsons Bay Planning Scheme, including the Schedule to Clause 52.28 which requires applicants to provide a Social Impact Assessment and specifies locations where EGMs are prohibited.

2.5 Update the relevant provisions of the Hobsons Bay Planning Scheme to ensure all existing and planned shopping complexes and shopping strips where new EGM venues are prohibited are listed and mapped, and to encourage any future growth to preferred locations away from activity centres, sensitive land uses, and disadvantaged areas or vulnerable communities.

2.6 Request that any planning application seeking to extend the hours for a liquor licence at a gaming venue in Hobsons Bay include a Social Impact Assessment which considers the community impact of increased access to EGMs.

Priority Area Three: Use of Council assets and facilities

Why is Council taking this approach?

Council assets and facilities play a key role in building healthy communities. Sporting facilities, libraries, and community centres are important community hubs that support health and wellbeing, especially for children, young people, and older people. Council manages lease and licensing agreements with community organisations for the use of land and facilities owned or managed by Council. These agreements are guided by the Hobsons Bay Property Strategy 2021-30.

However, we also know that the gambling industry sponsor sporting clubs and local community organisations, which promotes gambling products and venues. Research indicates that promotion contributes to the 'normalisation' of gambling products co-located within environments perceived as positive family settings.⁴¹ Research has also shown that increased exposure to gambling products and venues increases the risk of harm for vulnerable groups such as children and older people.⁴²

Applying a comprehensive public health approach, Council will aim to create healthier community settings by limiting the promotion and availability of gambling venues and products within Council-owned or managed land and facilities.

⁴¹ Bestman, A., Thomas, S., Randle, M., Pitt, H., Cassidy, R. & Daube, M. (2019) 'Everyone knows grandma: Pathways to gambling venues in regional Australia', *Faculty of Business - Papers (Archive)*, <https://ro.uow.edu.au/buspapers/1675> - accessed February 2023.

⁴² Thomas, S., Pitt, H., Randle, M., Balandin, S., Cowlshaw, S., McCarthy, S., Bestman, A. & Daube, M. (2020) *Factors that shape the gambling attitudes and behaviours of older adults in Victoria*, Victorian Responsible Gambling Foundation, Melbourne, accessed February 2023.

How will Council do this?

To prevent harm from gambling, Council will:

- 3.1 Include a clause prohibiting any increase to the number of EGMs when existing leases are renewed for Council owned or managed land or facilities where EGMs are operated. Should the number of EGMs be reduced over the life of the lease, no subsequent increases will be permitted.**
- 3.2 Not enter into any new leases or other legal agreements for the use of Council owned or managed land and/or building(s) with organisations that propose to operate electronic gaming machines within that land and/or building(s).**
- 3.3 Not approve new advertising⁴³ and also work with sporting clubs and community organisations to remove existing advertising of gaming venues, online gambling companies or gambling products on land that is owned or managed by Council.**
- 3.4 Prevent access to gambling websites and explore options to block advertising from major online gambling companies on Council's information technology used by staff and the community.**

Exemptions

- Commitment 3.2: Organisations that have existing leases for Council-owned or managed land and/or buildings where EGMs are operated.
- Commitment 3.3: Council-owned or managed land which incorporates a gaming venue.

Priority Area Four: Access to Council resources

Why is Council taking this approach?

Council provides a range of services, facilities, activities, and other support for residents and visitors to Hobsons Bay. The introduction of 'rate capping', alongside increasing costs to deliver core activities, have placed additional and ongoing pressure on Council budgets.

At the same time, losses from EGMs and online gambling continue to increase, with just a small proportion coming back to directly benefit local communities.⁴⁴ For example, between 2019-20 and 2021-22, Community Benefits Statements show that just over one per cent of the losses at Hobsons Bay's seven club EGM venues was returned to the community in the form of sponsorships, gifts and donations (see Appendix 6).

Applying a comprehensive public health approach, Council will not provide grants, funding or in-kind support (such as community transport) to activities and organisations that promote or derive income from gambling, with relevant exceptions. Instead, it will prioritise activities and organisations that deliver healthier outcomes for local communities, helping to reduce community exposure to gambling products and venues, while supporting community groups to consider alternatives to sponsorship from the gambling industry.

⁴³ Under Commitment 3.3, 'advertising' refers to 'static betting advertising' as defined in the *Gambling Regulation Act 2003* (see Appendix 5 for a full definition).

⁴⁴ Francis, L. & Livingstone, C. (2020) 'Gambling's community contributions: does the community benefit?', *Addiction Research & Theory*, 28:5, 365-378, DOI: [10.1080/16066359.2019.1663834](https://doi.org/10.1080/16066359.2019.1663834), accessed February 2023.

How will Council do this?

To prevent harm from gambling, Council will:

4.1 Not provide Council grants or funding to organisations that promote or derive income from gambling.

4.2 Not provide Council grants or in-kind support to activities that promote gambling or are held in gaming venues.

4.3 Not provide Council grants to organisations or activities that receive sponsorships from gaming venues, online gambling companies or other gambling providers.

4.4 Explore opportunities to consider tenderers' relationship with the gambling industry as an 'assessable criteria' for relevant public tenders offered by Council.

4.5 Regularly update rates valuations for all gaming venues in Hobsons Bay.

Exemptions

- Commitment 4.1: Capital grants funding or co-funding (e.g. matching Victorian Government funding) used to deliver new or upgraded Council-owned infrastructure or equipment; operational servicing (e.g. maintenance, repairs) of land or facilities that are owned or managed by Council.
- Commitment 4.2: Anzac Day and Remembrance Day activities supported by Council; raffles, bingo and tipping competitions arranged by community groups for the purposes of raising funds.

Transition period

- Commitment 4.1: this commitment will come into effect from 1 July 2025.
- Commitment 4.3: this commitment will come into effect from 1 July 2025 (or later for existing long-term contractual arrangements, as required).

Priority Area Five: Prevention and Support

Why is Council taking this approach?

Research indicates that increased exposure to gambling products increases the risk and experience of harm from gambling.⁴⁵ Prevention programs and support programs play an important role in raising awareness, providing alternative activities, and assisting the recovery of people and families impacted by gambling harm.

Over many years, local gaming venues have come to play a key role in local communities, particularly venues operated by community clubs. These organisations have long-standing local connections and have broadened their appeal through the provision of affordable and accessible social activities, meals and meeting spaces. However, the presence of gambling products in these settings increases the risk of harm and further normalises the relationship between gambling and social interactions, particularly in neighbourhoods with limited alternative activities and venues.

Council can play a key role through its capacity to deliver and promote activities, programs and services. Applying a comprehensive public health approach, Council will support

⁴⁵ Thomas et al (2020), accessed March 2023.

access to available prevention programs and services, including for people of different genders, ages and cultural backgrounds. It will also aim to limit exposure to gambling venues and products, and deliver, promote and use alternative venues and activities.

How will Council do this?

To prevent harm from gambling, Council will:

5.1 Support and promote gambling support services and programs in local communities.

5.2 Deliver and promote activities that provide alternatives to gambling and gaming venues.

5.3 Establish partnerships and/or seek external funding to deliver and support activities and programs to prevent harm from gambling.

5.4 Not hold council events, activities or programs in gaming venues.

Priority Area Six: Research and awareness

Why is Council taking this approach?

Community awareness of the causes and impacts of gambling harm are typically understood through an ‘individual responsibility’ lens, reinforced through gambling advertising and media coverage. Terms such as ‘responsible gambling’ and ‘problem gambling’ are commonplace but tend to stigmatise people with lived experience of gambling harm and do little to prevent harm.⁴⁶

A comprehensive public health approach aims to re-frame the determinants and impacts of gambling harm, drawing attention to sociocultural, environmental, commercial and political factors. Clear language and stories of lived experience play a key role in this process, alongside local research and clearly presented information on gambling activity and products.

Council can play a key role through its capacity to monitor research and data and presenting this to local communities, including by highlighting the varying risks and impacts for people of different ages and genders. Applying a comprehensive public health approach, Council aims to re-frame narratives around gambling harm towards underlying causes and impacts and away from perspectives that rely exclusively on the framework of ‘individual responsibility’.

How will Council do this?

To prevent harm from gambling, Council will:

6.1 Change the narrative around gambling harm by raising awareness of its causes and impacts in local communities to Council staff and the broader Hobsons Bay community.

6.2 Monitor and promote research and data relating to the impact of gambling products and venues in local communities, including expenditure on EGMs and

⁴⁶ Marko et al (2023).

online gambling, Community Benefits Statements, and community attitudes towards gambling.

6.3 Support research (excluding projects funded by the gambling industry) into the impacts of gambling in local communities.

8. Transition periods

Council recognises that implementation of this Policy Statement will require planning and support to identify and mitigate potential impacts on local communities. Additionally, stakeholder and community engagement highlighted that some of the commitments will need to be implemented over time to support residents, community groups and other organisations to adjust to new arrangements.

Therefore, Council will apply transition periods to facilitate some of these changes. Over this time, Council will inform any impacted groups and provide support to adjust to Council's new policy settings. As highlighted in the Priority Areas, the following policy commitments will come into full effect from 1 July 2025:

- *4.1 – Council will not provide Council grants or funding to organisations that promote or derive income from gambling.*
- *4.3 – Council will not provide Council grants to organisations or activities that receive sponsorships from gaming venues, online gambling companies or other gambling providers.*

9. Implementation and monitoring

This Policy Statement will guide Council's ongoing efforts to prevent harm from gambling in Hobsons Bay. It complements Council's other plans, policies and strategies, including the Council Plan 2021-25 (incorporating the Municipal Public Health and Wellbeing Plan), Hobsons Bay 2030 Community Vision, Hobsons Bay Property Strategy 2021-30, Hobsons Bay Leasing and Licensing Policy 2021-30, and A Fair Hobsons Bay for All 2023-27 (in development).

An implementation plan will outline key actions, which will be informed by available resources, current priorities, and emerging issues and opportunities. Where additional resources are required, these will be subject to Council's annual budget processes and/or external funding opportunities.

Progress will be monitored and reported via Council's existing processes, which may include the Annual Report and/or other public reporting methods. The implementation plan may also be reviewed and updated as actions are completed and/or new priorities arise.

The Policy Statement will be reviewed within five years from the date of Council adoption (or earlier, if required) to ensure it takes account of contemporary policy and funding contexts and relevant Council plans, policies and strategies. The implementation plan will continue to guide operational activities until any future updated Policy Statement is endorsed by Council.

10. Appendices

Appendix 1: Gender Impact Assessment

As per the requirements of the *Gender Equality Act 2020*, Council is required to prepare a Gender Impact Assessment (GIA) for all new and updated programs, policies and services that have a direct and significant public impact. GIAs help us to think critically about how policies, programs and services will meet the different needs of women, men and gender diverse people.

Research and Findings

Gambling harm is known to impact people of all genders, both directly (as the affected individual) and through family members or friends (as an affected other). In developing this Policy Statement, research was undertaken to better understand the key issues for people of different genders and who is most at risk of being harmed by gambling in Hobsons Bay.

Many gambling products are linked to issues of major community concern including family violence, homelessness, energy poverty, mental health problems and suicide.⁴⁷ More detail is provided below from a gender perspective.

- **Family Violence** – There is a link between gambling harm and family violence. Research indicates that, while gambling does not directly cause intimate partner violence, it reinforces the gendered drivers of violence to intensify the frequency and severity of intimate partner violence against women.⁴⁸ Research also highlights the prevalence of economic abuse of women experiencing gambling-related intimate partner violence. Additionally, it identifies that gaming venues serve as safe spaces for women, and that in many areas there are few alternatives.
- **Men** - Men are more likely to experience harm from their own gambling than women (1% per cent of men vs. 0.5 per cent of women experience significant harm from gambling).⁴⁹ More severe gambling harm is particularly prevalent in young men (25-44 years old).⁵⁰ However, it should also be noted that men play a more prominent role in organisations that derive income from gambling. For example, an analysis of 'approved associates' for gaming venues in Hobsons Bay (typically board/committee members or management staff) showed that around 70 per cent were male.⁵¹
- **First Nations people** – A 2014 study found that Indigenous men experience gambling harm more than Indigenous Women.⁵²
- **Income** - Data from the 2021 Census shows that 53 per cent of women in Hobsons Bay are in the two lower income quartiles for equivalised individual weekly income

⁴⁷ Marko S, Thomas SL, Pitt H, Daube M. (2022) "Aussies love a bet": Gamblers discuss the social acceptance and cultural accommodation of gambling in Australia', *Australian New Zealand Journal of Public Health*, 46(6), pp. 829-834

⁴⁸ 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 - accessed March 2023

⁴⁹ Rockloff, M. et al (2020)

⁵⁰ Ibid.

⁵¹ Victorian Gambling and Casino Control Commission, (n.d) *Licence Information*, <https://www.vgcc.vic.gov.au/resources/information-and-data/licence-information> - accessed March 2023.

⁵² Hing, N., Breen, H., Gordon, A., & Russell, A. (2014) 'Gambling among Indigenous men and problem gambling risk factors: An Australian study', *International Journal of Mental Health and Addiction*, accessed March 2023

(\$0-399; \$400-799), compared to 38 per cent of men.⁵³ This vulnerability increases the risk of harm.⁵⁴

- **Homelessness** – Older women are one of the fastest growing groups experiencing homelessness in Australia. Between 2011 and 2016, the number of women aged 55 years and above experiencing homelessness grew from 5,234 to 6,866, a 31 per cent increase.⁵⁵ Additionally, in 2019-20, 62 per cent of the specialist homelessness service clients in Hobsons Bay were female.⁵⁶

Recommendations

Based on the research and findings outlined above, the following recommendations have been implemented in the development of this Policy Statement:

1. *A broad 'gender lens' has been applied to seek and consider the experience, knowledge and lived experience of women, men, and gender diverse people.*
2. *Community and stakeholder engagement has sought input from people of different genders, as well as service providers that interact with a range of groups at risk of gambling harm.*
3. *Commitments included in the updated Policy Statement take account of people of different genders, and implementation will include targeted actions where required.*

⁵³ .id informed decisions (n.d.) *Hobsons Bay City - Community Profile*, .id community demographic resources, <https://profile.id.com.au/hobsons-bay/service-age-groups> - accessed February 2023.

⁵⁴ Rockloff, M. et al (2020)

⁵⁵ Australian Bureau of Statistics (2018) *Census of Population and Housing: Estimating homelessness 2016*, Cat. No. 2049.0

⁵⁶ Australian Institute of Health and Welfare (2020) *Specialist homelessness services annual report 2019-20*, AIHW, Australian Government, accessed February 2023.

Appendix 2: EGM venues in Hobsons Bay

No.	Venue	Operator	Type	2020-21 (open 207 days)			2021-22 (open 269 days)			2022-23 (open 365 days)		
				EGMs	Total (\$)	Daily (\$)	EGMs	Total (\$)	Daily (\$)	EGMs	Total (\$)	Daily (\$)
1	Millers Inn Hotel	ALH Group Pty. Ltd.	Hotel	70	6,459,931	31,207	70	9,892,214	36,774	70	13,949,896	38,218
2	Newport Social Club <i>(formerly Seagull's Nest)</i>	Williamstown Football Club	Club	66	4,378,237	21,151	66	5,501,175	20,450	66	7,188,441	19,694
3	Club Laverton	Carlton Football Club Ltd.	Club	60	4,062,027	19,623	60	5,359,666	19,924	60	7,194,092	19,709
4	Altona Sports Club	Altona Sports Club Inc.	Club	83	2,298,352	11,103	83	3,160,764	11,750	83	4,476,331	12,263
5	Koorringal Golf Club	Koorringal Golf Club	Club	61	2,607,682	12,597	61	3,080,997	11,454	61	3,823,989	10,476
6	Altona RSL	Altona RSL Sub-Branch Inc.	Club	58	1,989,539	9,611	58	2,703,998	10,052	58	3,779,808	10,355
7	The Vic Inn	Carlton Football Club Ltd.	Club	60	1,800,009	8,696	60	2,637,488	9,805	60	3,204,799	8,780
8	Rifle Club Hotel	ALH Group Pty. Ltd.	Hotel	40	1,420,893	6,864	40	1,393,267	5,179	40	2,569,227	7,040
9	Altona Bowling Club	Altona Bowling Club Inc.	Club	37	873,140	4,218	37	1,100,281	4,090	37	1,763,806	4,832
	Totals			535	25,889,811	125,072	535	34,829,849	129,479	535	47,950,389	131,371

Appendix 3: Schedule to Clause 52.28 Gaming

1.0 Objectives

To ensure that the social and economic impact of the Electronic gaming machine (EGM) is not detrimental to the wellbeing of the community.

To ensure that EGM venues are located, designed and operated in a manner that minimises opportunities for convenience gambling.

To locate EGMs away from disadvantaged areas or vulnerable communities.

To ensure gaming is not the primary use within a venue.

To ensure proposals for gaming premises deliver a net community benefit in Hobsons Bay.

2.0 Prohibition of a gaming machine in a shopping complex

Installation or use of a gaming machine as specified in Clause 52.28-4 is prohibited on land described in Table 1 below.

Name of shopping complex and locality	Land description
Central Square, Altona Meadows	Land on the southwest corner of Central Avenue and Merton Street, also known as 1-23 Central Avenue, Altona Meadows
Altona Gate, Altona North	Land on the northwest corner of Beuron Road and Millers Road, also known as 124-134 Millers Road, Altona North including 84-122 Millers Road, Altona North

3.0 Prohibition of a gaming machine in a strip shopping centre

A gaming machine as specified in Clause 52.28-5 is prohibited in a strip shopping centre specified in Table 2 below.

Name of strip shopping centre and locality	Land description
Aviation Road, Laverton	1-9 (odd numbers) and 2-28 (even numbers) Aviation Rd; 161-163 (odd numbers) Railway Ave; 2-8 (even numbers) Neville Ave
Borrack Square, Altona North	1-39 (odd numbers) and 2-40 (even numbers) Borrack Square; 202-204 (even numbers) Millers Rd
Challis Street, Newport	31-47 (odd numbers) and 44-56 (even numbers) Challis St
Douglas Parade/Ferguson Street, Williamstown	2-102 (even numbers) and 7-97 (odd numbers) (including land at the rear of 87) Ferguson St; 1-111 (odd numbers) and 4-110 (even numbers) (including land at the rear of 32-36 (even numbers)) Douglas Pde; 32-36 (even numbers) Lyons St; 101 Napier St; 4-10 (even numbers) Roaches Terrace; 64-68 (even numbers) and 77-83 (odd numbers) Stevedore St; land at the rear of 85 Stevedore St; 72-74 (even numbers) Electra St; 1-17 (odd numbers) and 2-14 (even numbers) Coxs Garden; 2-16 (even numbers) and 15-27 (odd numbers) (including land at the rear of 27) Wellington St; 166-168 (even numbers) Aitken St
Harrington Square, Altona	1-31 Harrington Square; 116-188 Maidstone St
Hudsons Road, Spotswood	29 Hope St; 68-98 (even numbers) and 79-101, 139, 145A and 145B (odd numbers) (excluding the rear of 87-97 (odd numbers)) Hudsons Rd and 606-612 Melbourne Rd
Millers Junction, Altona North	24-42 Cabot Drive and 290-298 Millers Road

Newport Junction, Newport	1-5 (odd numbers), 2-26 (even numbers) and 17-33A (odd numbers) Mason St; 33-37 (odd numbers); 1 Susman St; 1-46A Hall St (excluding land at the rear of 15 Hall St); 314-344 (even numbers) and 405-455 (odd numbers) Melbourne Rd; 1 Walker St
Pier Street, Altona	18-122 (even numbers) (including the 3 lots at the rear of 122) and 39-121 (odd numbers) Pier St; 9 and 19 Bent St; 112-122 (even numbers) Queen St; 66-92 (even numbers) Railway St Sth; 137 and 153 The Esplanade
Somers Parade, Altona	45 Maidstone St and 3-31 (odd numbers) Somers Parade
The Circle, Altona North	9-13 (odd numbers) and 25-75 (odd numbers) The Circle
The Range, Williamstown North	71-79 (odd numbers) Kororoit Creek Rd
Woods Street, Laverton	44-68 (even numbers) Woods St; 2-18 (even numbers) Lohse St; 36-38 (even numbers) Maher St
Vernon Street, South Kingsville	15-41 (odd numbers) and 30-36 (even numbers) Vernon St

4.0 Locations for gaming machines

Gaming venues and machines should be located:

- On sites that minimise the likelihood of people passing the venue in the course of their usual business or everyday activities.
- Outside areas that are either:
 - Of relative socio-economic disadvantage. Socio-economic disadvantage is defined as households in the bottom two deciles (lowest 20 per cent) of the SEIFA (Socio-Economic Indexes for Areas) index of relative disadvantage, based on the Australian Bureau of Statistics, Statistical Area Level 1 (SA1) which is the smallest unit of Census data.
 - Identified as Strategic Redevelopment Areas in the Strategic Framework Plan at Clause 02.04.

5.0 Venues for gaming machines

Gaming machines should be located:

- In venues that:
 - Provide a range of social, leisure and recreational activities, with gaming being only a component of these activities.
 - Physically and visually separate the venue's gaming activities from its non-gaming activities.
- Where the design and operating hours will not detrimentally affect the amenity of the surrounding area.
- Outside of venues where:
 - The gaming floor area is more than 25 percent of the total floor area.
 - It may cause adverse amenity impacts on the adjoining land uses as a result of operating hours, traffic, noise, car parking and safety.

6.0 Application requirements

The following application requirements apply to an application for a permit under Clause 52.28, in addition to those specified elsewhere in the scheme and must accompany an application, as appropriate, to the satisfaction of the responsible authority:

- Detailed plans of the design and layout of the venue (including the location of all existing and proposed EGMs).

- Details of the venue's existing and proposed hours of operation.
- A Social Impact Assessment prepared by a suitably qualified person, as per Council's Social Impact Assessment Guidelines (Hobsons Bay City Council, March 2011), including:
 - Details and analysis of the venue's projected patron catchment and its socio-economic profile.
 - If it is proposed to move EGMs from one part of the municipality to another, details of the relative social and economic differences between the two areas. An explanation as to why the EGMs are being transferred is to be provided.
 - Characteristics of the local area including the location of and distance to shopping complexes and strip shopping centres, community facilities, public housing, counselling services and public transport.
- Details of existing and proposed gambling and non-gambling related entertainment and recreation facilities and activities at the venue and within one kilometre of the venue.
- Details of existing and proposed distribution and density of EGMs in the municipality and its neighbourhoods.
- Details of existing gaming expenditure at the venue over a three year period prior to the application (if relevant).
- If EGMs are to be relocated from other venues, and as a result, gaming expenditure is likely to be transferred from other venues:
 - Particulars as to how the level of expenditure transfer has been calculated (including, but not limited to, comparison of per machine expenditure at the venue prior to, and anticipated expenditure after, the installation of additional machines).
 - The resulting impacts on the venue from where the expenditure is transferred.
- Details of the nature and extent of community benefits expected from the proposal and how the benefits are to be secured for and distributed across the local community.
- Assessment of key social and economic issues and overall net community impact.
- Measures to mitigate any negative social and economic impacts from EGMs.

7.0 Decision guidelines

The following decision guidelines apply to an application for a permit under Clause 52.28, in addition to those specified in Clause 52.28 and elsewhere in the scheme which must be considered, as appropriate, by the responsible authority:

- Whether the proposal will result in a net social and economic benefit, aside from any community contribution scheme.
- Whether the proposal increases EGM densities in the area and how that increase affects the local community and compares with the metropolitan Melbourne average.
- Whether the proposal will result in EGMs clustering in the area and whether this is likely to increase the social disadvantage of the area.
- Whether the venue offers a range of non-gambling entertainment and recreation options.
- Whether the location, design and operation of the venue will facilitate convenience gambling.
- Whether the proposal will impact on the amenity of the area and surrounding land uses.

Appendix 4: Mapping commitments against determinants of gambling harm

No.	Commitment	Determinant of gambling harm
1.1	Advocate to State and Federal Governments for the introduction and timely implementation of legislative and regulatory reform which prioritise health and wellbeing and protect local communities from gambling harm, free from gambling industry influence.	Political, Commercial
1.2	Support the Alliance for Gambling Reform, neighbouring Councils and other key partners to advocate for legislative and regulatory reform to protect local communities from gambling harm.	Political, Commercial, Socio-cultural
2.1	Oppose any gaming licence application for new gaming venues or additional EGMs in Hobsons Bay that do not provide net community benefit (as measured by an independent Social and Economic Impact Assessment). When Council opposes an application, it will adequately resource the representation at the Victorian Gambling and Casino Control Commission and subsequent representation at Victorian Civil and Administrative Tribunal hearings, if required.	Environmental, Socio-cultural, Commercial
2.2	Consider making a submission on any gaming licence application for a new gaming venue or additional EGMs within an existing venue where the venue is located in an adjacent municipality within 2.5 kilometres of the municipal border.	Environmental, Socio-cultural, Commercial
2.3	Explore opportunities to support gaming venues in Hobsons Bay who express an interest in reducing or removing their EGM entitlements.	Commercial, Environmental, Socio-cultural
2.4	Make decisions and provide advice relating to EGMs in accordance with this Policy Statement and the relevant provisions of the Hobsons Bay Planning Scheme, including the Schedule to Clause 52.28 which requires applicants to provide a Social Impact Assessment and specifies locations where EGMs are prohibited.	Environmental, Socio-cultural, Commercial
2.5	Update the relevant provisions of the Hobsons Bay Planning Scheme to ensure all existing and planned shopping complexes and shopping strips where new EGM venues are prohibited are listed and mapped, and to encourage any future growth to preferred locations away from activity centres, sensitive land uses, and disadvantaged areas or vulnerable communities.	Environmental, Socio-cultural, Commercial
2.6	Request that any planning application seeking to extend the hours for a liquor licence at a gaming venue in Hobsons Bay include a Social Impact Assessment which considers the community impact of increased access to EGMs.	Environmental, Socio-cultural, Commercial
3.1	Include a clause prohibiting any increase to the existing number of EGMs when leases for Council owned or managed land or facilities are due for renewal where EGMs are operated. Should the number of EGMs be reduced over the life of the lease, no subsequent increases will be permitted.	Commercial, Environmental, Socio-cultural
3.2	Not enter into any new leases or other legal agreements for the use of Council owned or managed land and/or building(s) with organisations that propose to operate electronic gaming machines within that land and/or building(s).	Commercial, Environmental, Socio-cultural
3.3	Not approve new advertising and work with sporting clubs and community organisations to remove existing advertising of gaming venues, online gambling companies or gambling products on land that is owned or managed by Council.	Commercial, Environmental, Socio-cultural
3.4	Prevent access to gambling websites and explore options to block advertising from major online gambling companies on Council's information technology used by staff and the community.	Environmental, Socio-cultural, Commercial

4.1	Not provide Council grants or funding to organisations that promote or derive income from gambling.	Commercial, Environmental, Socio-cultural
4.2	Not provide Council grants or in-kind support to activities that promote gambling or are held in gaming venues.	Environmental, Socio-cultural, Commercial
4.3	Not provide Council grants to organisations or activities that receive sponsorships from gaming venues, online gambling companies or other gambling providers.	Environmental, Socio-cultural, Commercial
4.4	Explore opportunities to consider tenderers' relationship with the gambling industry as an 'assessable criteria' for relevant public tenders offered by Council.	Commercial, Environmental
4.5	Regularly update rates valuations for all gaming venues in Hobsons Bay.	Commercial, Environmental
5.1	Support and promote gambling support services and programs in local communities.	Environmental, Socio-cultural
5.2	Deliver and promote activities that provide alternatives to gambling and gaming venues.	Environmental, Socio-cultural
5.3	Establish partnerships and/or seek external funding to deliver and support activities and programs to prevent harm from gambling.	Environmental, Socio-cultural
5.4	Not hold council events, activities or programs in gaming venues.	Environmental, Socio-cultural, Commercial
6.1	Change the narrative around gambling harm by raising awareness of its causes and impacts in local communities to Council staff and the broader Hobsons Bay community.	Political, Environmental, Socio-cultural
6.2	Monitor and promote research and data relating to the impact of gambling products and venues in local communities, including expenditure on EGMs and online gambling, Community Benefits Statements, and community attitudes towards gambling.	Political, Environmental, Socio-cultural
6.3	Support research (excluding projects funded by the gambling industry) into the impacts of gambling in local communities.	Environmental, Socio-cultural

Appendix 5: Definitions

The following terms are used in this Policy Statement as defined below:

- **Advertising** – advertising refers to ‘static betting advertising’ as defined in the *Gambling Regulation Act 2003* which includes (but is not limited to):
 - static advertising displays, e.g. billboards, banners, hoardings, signs, images or rolling static displays
 - digital billboards and panels, including those that display moving or video images
 - moveable billboards and displays.

For the purposes of Commitment 3.3, advertising does not include the display of a sponsor’s name, logo and/or other distinguishing feature(s) on physical materials (e.g. signage, clothing, written materials) or online content (e.g. website, social media).

- **Community Benefit Statement** – as per the *Gambling Regulation Act 2003*, clubs operating a gaming venue are required to prepare and lodge an audited community benefit statement with the VGCCC for every financial year in which they receive gaming machine revenue. A community benefit statement verifies whether the community benefit provided by the club is equal to at least 8.33 per cent of its net gaming machine revenue. The details of the Scheme are established via a Ministerial Order, last issued in June 2012.⁵⁷
- **Council funding** – allocations made directly to organisations through Council’s annual budget process. For the purposes of Commitment 4.1 of this Policy Statement, this does not include Capital Works funding or co-funding, i.e. allocations for new or upgraded Council-owned facilities such as buildings and pavilions.
- **Council grant** – non-recurrent funding provided through a grants program administered by Council.
- **Donations** – funding provided from one organisation to another as an act of ‘goodwill.’ The recipient does not (and is not expected to) promote or advertise the organisation making the donation. In the context of the gambling industry, donations may be provided for the purposes of community benefit to offset the negative impacts of gambling. Donations may be recorded on a club venue’s Community Benefit Statement.
- **Electronic Gaming Machine (EGM)** – the *Gambling Regulation Act 2003* defines an electronic gaming machine as ‘any device, whether wholly or partly mechanically or electronically operated for the purpose of playing a game of chance or a game of

⁵⁷ Victorian Gambling and Casino Control Commission (n.d.) ‘Community benefit statements’, <https://www.vgccc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/your-obligations/community-benefit>, accessed June 2023.

mixed chance and skill'.⁵⁸ EGMs are commonly known as 'poker machines' or 'pokies.'

- **Gambling** – the Victorian Responsible Gambling Foundation states that gambling (also known as betting) 'requires a player to risk losing something of value (usually money) for the chance of winning more. Gambling outcomes may depend on correctly predicting an uncertain outcome (such as a particular horse coming first in a race) or luck (such as a winning combination of symbols on a pokie machine)'.⁵⁹
- **Gambling harm** – research commissioned by the Victorian Responsible Gambling Foundation found that '[g]ambling related harm can be divided into seven key areas: Financial harm, relationship disruption, emotional or psychological distress, decrements to health, cultural harm, reduced work or study performance, and criminal activity. These harms can further be considered as general harms (which occur at any time), crisis harms, which are associated with attempts to seek help, and legacy harms, which occur long after gambling has ceased.'⁶⁰
- **Gambling industry** – the gambling industry includes (but is not limited to) organisations that derive income from gambling products and activities, including gaming venues, gaming venue operators, and online gambling companies. This definition extends to peak organisations and industry groups that aim to advance their interests.
- **Gaming licence application** – the Victorian Gambling and Casino Control Commission conducts inquiries under the *Gambling Regulation Act 2003* to approve a premises as suitable for gaming or to increase the number of EGMs permitted in an approved venue. Under the Act, the Commission must notify relevant the Council, which can make a submission in response to the application.
- **Gaming Venue** – an establishment where licensed EGMs are present and operational.
- **Gaming Venue Operator** – an entity (such as a company or club) holding a venue operator licence enabling it to operate EGMs in Victoria.
- **Lease** – an agreement that grants a tenant exclusive possession of Council property for a specified period of time, subject to certain terms and conditions and creates an interest in land that is binding on third parties which is capable of being assigned.
- **Lessee** – a person (or other entity) who is granted a lease.
- **License** – an agreement that grants non-exclusive use of Council land/property for a specific period and subject to certain terms and conditions; it does not create any estate or interest in or over the licensed premises.

⁵⁸ Victorian Government (2003) *Gambling Regulation Act 2003*, Version 97 (effective 10 March 2023), <https://www.legislation.vic.gov.au/in-force/acts/gambling-regulation-act-2003/087>, accessed February 2023.

⁵⁹ Victorian Responsible Gambling Foundation (n.d.) *Glossary*, <https://responsiblegambling.vic.gov.au/resources/glossary>, accessed February 2023.

⁶⁰ *ibid.*

- **Licensee** – a person (or other entity) who is granted a license.
- **Loot boxes** – loot boxes involve ‘microtransactions’ that occur within online games that provide opportunities to acquire rewards, often purchased with real money. Research has identified that loot boxes apply the same psychological tactics that lead people to experience harm from EGMs.
- **Online gambling** – online gambling refers to websites and products that allow gambling activities to be conducted on the internet using technology such as computers or mobile phones. Typically, users gamble on sporting or racing activities, but there is an increasing range of options available, including elections and reality television.
- **Social and Economic Impact Assessment** – a Social and Economic Impact Assessment (SEIA) aims to identify the extent to which a gaming licence application (typically for additional EGMs) will affect the wellbeing of local communities. Councils may commission an independent SEIA to inform its decision as to whether to oppose any gaming licence application within its municipal borders. In practice, there are many similarities between a SEIA and a Social Impact Assessment (see below).
- **Social Impact Assessment** – a Social Impact Assessment (SIA) aims to identify the extent to which a planning application relating to EGMs will affect community health and wellbeing (including amongst disadvantaged groups) and whether it will provide a benefit or cost to the Hobsons Bay community. In 2022, Council adopted new SIA Guidelines that will be applied to any future planning approval processes. In practice, there are many similarities between a SIA and a Social and Economic Impact Assessment (see above).
- **Sponsorship** – funding provided from one organisation to another in return for public advertising or promotion. Sponsorship typically includes the display of the sponsor’s name, logo and/or other distinguishing feature(s) on physical materials (e.g. signage, clothing, written materials) or online content (e.g. website, social media).

Appendix 6: Summary of Community Benefits Statements

	2019-20		2020-21		2021-22	
	Total (\$)	% of Losses	Total (\$)	% of Losses	Total (\$)	% of Losses
Class A: Direct community benefits						
(a) Donations, gifts and sponsorships (including cash, goods and services)	245,552	1.09%	182,769	1.01%	290,568	1.23%
(b) Cost of providing and maintaining sporting activities for use by club members	596,597	2.64%	591,908	3.29%	623,968	2.65%
(c) Cost of any subsidy for the provision of goods and services but excluding alcohol	342,093	1.51%	197,390	1.10%	237,708	1.00%
(d) Voluntary Services provided by members and/or staff of the club to another person in the community	48,040	0.21%	32,610	0.18%	30,380	0.12%
(e) Advice, support and services provided by the RSL to ex-service personnel, their carers and families	8,525	0.04%	9,593	0.05%	23,691	0.10%
Sub-Total (Class A)	1,240,807	5.49%	1,014,270	5.63%	1,206,315	5.12%
Class B: Indirect community benefits						
(a) Capital expenditure	23,271	0.10%	123,422	0.69%	435,792	1.85%
(b) Financing Costs (including principal and interest)	65,756	0.29%	94,425	0.52%	91,523	0.38%
(c) Retained earnings accumulated during the year	0	0.00%	0	0.00%	0	0
(d) Provision of buildings, plant and equipment over \$10,000 per item ⁶¹	115,620	0.51%	22,028	0.12%	0	0
(e) Operating costs, e.g. wages, electricity, rates	6,184,065	27.37%	5,635,972	31.30%	6,421,296	27.27%
Sub-Total (Class B)	6,388,712	28.28%	5,875,847	32.63%	6,948,611	29.51%
Class C: Miscellaneous						
(a) Provision of responsible gambling measures and activities but excluding those required by law	0	0.00%	0	0.00%	0	0
(b) Reimbursement of expenses reasonably incurred by volunteers	823	0.00%	0	0.00%	0	0
(c) Community Benefits Statement preparation and auditing expenses	6,465	0.03%	6,492	0.04%	6,557	0.03%
Sub-Total (Class C)	7,288	0.03%	6,492	0.04%	6,557	0.03%
Total (Class A + Class B + Class C)	7,636,807	33.80%	6,896,609	38.30%	8,161,484	34.66%
EGM Losses (Clubs only)	22,592,496		18,008,987		23,544,368	

⁶¹ Excluding gaming equipment or the gaming machine area of the venue.

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12. Further information

For further information on Council's Gambling Harm Prevention Policy Statement, please contact Council's Social and Strategic Planning team on **1300 179 944** or email socialplanning@hobsonsabay.vic.gov.au

13. Document control

Policy Name	Gambling Harm Prevention Policy Statement
Agility Document Number	A3956926
Responsible Directorate	Sustainable Communities
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14. Version history

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