



Committee Secretary
Parliamentary Joint Committee on Corporations and Financial Services
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Canberra ACT 2600

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Deaf Services and the Deaf Society

Public submission to the Parliamentary Joint Committee on Corporations and Financial Services' inquiry on:

Regulation of the use of financial services such as credit cards and digital wallets for online gambling in Australia

Executive Summary

Deaf Services and the Deaf Society is a not-for-profit providing crucial services for the Deaf, deafblind and hard of hearing communities. Deaf Services operates an Art Union, The Deaf Lottery, which is vital source of financial support for the delivery and expansion of essential services. There is a risk that Art Unions and other charitable fundraising activities could be inadvertently captured by legislative changes designed to minimize problematic and harmful gambling behaviours. This submission outlines the importance of Art Unions as a fundraising model in the not-for-profit sector and makes the case for expressly excluding Art Unions and charitable fundraisers from restrictions to the use of credit cards for online gambling products and services.

About Deaf Services and the Deaf Society

Deaf Services and the Deaf Society is a not-for-profit organisation supporting the Deaf, deafblind and hard of hearing communities. The organisation has a long and proud history of connecting and engaging with the Deaf community for over 118 years and today offers a range of services to support the community including Auslan Classes, Interpreting Services, Lifestyle Support Services, Community Engagement and Aged Care support and socialisation services.

Having transitioned successfully to operating within the NDIS, fee for service and fundraising income model, our delivery focuses on enhancing outcomes that benefit deaf and hard of hearing children and adults across Australia. The access provided by Deaf Services' Interpreting Services team during natural disasters has set precedence across the nation and indeed the world by ensuring that there is information access for the Deaf community in Auslan (Australian Sign Language). As the only Aged Care provider in Australia directly serving the needs of deaf and hard of hearing people and the only non-government provider that focuses on bilingual approach to early intervention, we are seeing an increasing number of referrals from across Australia from deaf individuals and parents of deaf children to provide these important services.



Art Unions and the Deaf Lottery

Art Unions are a well-established and recognised fundraising model for not-for-profits in Australia. In Art Unions, winners are selected based on a ticket draw. The total number of tickets available for sale and the selling period are typically set in advance. In Australia, Art Unions are regulated under state and territory legislation aimed at facilitating not-for-profit fundraising while providing appropriate protections in line with community expectations.

Deaf Services' Art Union, The Deaf Lottery, is a crucial fundraiser for the organisation and provides financial support for the delivery and expansion of service offerings. The Deaf Lottery has been in operation for over thirty years and currently conducts seven major prize draws a year. Tickets are sold in a number of ways including in person, via mail, over the phone and online. Purchases with credit cards, including in online purchases and by subscription buyers, account for the vast majority of ticket sales each lottery.

Art Unions present a significantly lower risk in respect to problematic and harmful gambling behaviour, compared to other forms of online gaming, due to the structure of each lottery or draw. Art Unions do not provide immediate gratification or the ability to engage in high-frequency gaming. Instead, Art Unions have a limited number of draws and buyers wait days or weeks between their purchase of tickets and ticket draw being conducted. In addition, Deaf Services' experience is that buyers of charity lottery tickets do so with a different motivation compared with purchases in commercial lotteries. When asked, a majority of buyers indicate that their decision to purchase tickets is partly or wholly based on a desire to support the organisation's charitable purpose. These characteristics mean that Art Unions can be considered a low-risk gaming activity when it comes to problematic and harmful gambling behaviours.

Without legislation expressly protecting charitable lotteries (for example, Art Unions) there is significant risk that regulation of the use of credit cards may capture fundraising through Art Unions and equivalent fundraising by charitable and not-for profit organisations, and impact the sustainability of these charities, and the essential services they provide.

Recommendation:

Any legislative amendments should expressly exclude Art Unions and charitable lotteries run by not-for-profit organisations to ensure these fundraising activities are not inadvertently captured by such reforms.

Deaf Services and the Deaf Society appreciates the opportunity to make this submission to the Parliamentary Joint Committee's inquiry and is happy to provide further information should it be of assistance to the Committee.

Kind regards

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