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Ms Peta Murphy MP
Chair, House of Representatives Standing Committee on Social Policy and Legal Affairs
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Canberra ACT 260

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Inquiry into online gambling and its impacts on those experiencing gambling harm

The Association of Heads of Independent Schools of Australia (AHISA) welcomes the opportunity to contribute to the Committee's Inquiry into Online Gambling.

AHISA has already made representation to the Australian Government on several themes in the Inquiry's terms of reference. In 2018, AHISA contributed to a Senate inquiry into gaming micro-transactions for chance-based items ('loot boxes')¹ and in 2020 to a Department of Communications, Cyber Safety and the Arts review of Australian classification regulation.² In those submissions, and in submissions on online safety, AHISA has sought to highlight evidence of the risk of harm as well as actual harm to young Australians from exposure to or participation in activities that are age-restricted or which simulate such activities.

We advocate that evidence of risk of harm is sufficient reason for government to take regulatory action to safeguard the wellbeing of children and young people.

In this submission, we assume Committee members will be familiar with the evidence and arguments presented to previous inquiries and reviews. Our primary intent is to present Australian research evidence released since mid-2018 to demonstrate that the risk of harm and actual harm to young Australians from online gambling have not abated but have intensified through the proliferation of gambling apps, promotion of gambling on social media and the introduction of gambling-like elements to digital games.

Should you require further detail or clarification of material presented in this submission, please contact me at telephone [REDACTED]

Yours faithfully,

(Ms) Beth Blackwood

AHISA Chief Executive Officer



About AHISA

AHISA Ltd is a national professional association for Heads of independent schools, with six state/territory Branches.

The primary object of AHISA is to optimise the opportunity for the education and welfare of Australia's young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

AHISA's 450 members lead schools that collectively account for over 450,000 students, representing 70 per cent of total independent sector enrolments and over 11 per cent of total Australian school enrolments. Some 20 per cent of Australia's Year 12 students attend AHISA members' schools.

AHISA's members lead a collective workforce of over 45,000 teaching staff and some 28,700 support staff.

The socio-economic profile of AHISA members' schools is diverse. Over 20 per cent of our members lead schools serving low- to very low-SES communities.

AHISA believes that a high-quality schooling system in Australia depends on:

- Parents having the freedom to exercise their rights and responsibilities in regard to the education of their children
- Students and their families having the freedom to choose among diverse schooling options
- Schools having the autonomy to exercise educational leadership as they respond to the emerging needs of their communities in a rapidly changing society.

RECOMMENDATIONS

AHISA has made several recommendations in previous submissions to government on gambling harms and related protective measures. Recommendations of relevance to the Committee's inquiry include:

RECOMMENDATION 1

That the Australian Government makes a determination that chance-based micro-transactions in digital games are a form of online gambling. As a consequence of this determination, the Government should consider whether existing legislation restricting access to gambling products or services needs strengthening, and whether further industry regulation is required.

RECOMMENDATION 2

That an advisory group to the federal Minister for Youth be established to monitor developments relating to risk of harm to children and young people from online gambling, including from simulated games and in-game gambling, with a view to recommending national research projects, pinpointing new information of relevance to government-supported education programs and websites and suggesting amendments to existing legislation and other government regulatory measures such as industry use of product classifications and warnings when warranted.

RECOMMENDATION 3

The sheer scale of the potential for children to be exposed to online gambling, either through simulated gambling games or in-game gambling features, and therefore to the risk of normalisation of gambling activity, warrants ongoing review of federal online gambling regulation and legislation with a focus on children and young people as a specific sub-set of Australia's gambling population.

RECOMMENDATION 4

AHISA supports the proposition by Children & Media Australia that an age-based classification system that aligns with child developmental stages be introduced. CMA recommends that the present categories are replaced with: G (all), 5+ (where '+' indicates suitable for those older), 9+, 12+, 16+, 18+. To help simplify and therefore potentially amplify use of classifications and their influence in the community, AHISA supports the use of these categories across all media.

In this submission, AHISA further recommends:

RECOMMENDATION 5

That information and resource offerings on the Australian Government's Student Wellbeing Hub and on the website of the Office of the eSafety Commissioner be expanded to help promote awareness of and responses to gambling as an issue affecting young Australians.

1. Online gambling and the risk of harm to young Australians

In considering the impact of children's exposure to online gambling – whether simulated gambling, gambling or gambling-like action in digital games (such as 'loot box' acquisition during digital gaming) – or access to gambling play legally restricted to adults, it is important to take account of evidence that points to risk of harm as well as actual harm.

As referenced in AHISA's 2018 Senate inquiry submission, evidence available at that time suggested there is a high risk of harm to children from their exposure to online gambling, particularly in relation to 'initiation', 'consumer socialisation' or 'immersion', that is, there is a concern that normalisation of gambling activity may lead to problem gambling both prior to and on reaching adulthood. For example:

- In its report on simulated gambling games, the Australian Gambling Research Centre³ noted that 'the availability of simulated gambling on smartphones and tablets has generated concern, as *the constant availability of gambling-related activities facilitates a deep integration of gambling or gambling-like activities into everyday life*'.
- A report on gambling harm minimisation prepared for the NSW Government cited research findings that '*childhood involvement, parental role modelling and peer-group interactions at a young age formalise attitudes and beliefs regarding gambling and consequently the foundation for problem gambling in adulthood*'. The report concluded that '*Exposure to gambling at formative stages of development is a risk factor for the normalisation of gambling as a recreational activity*'.⁴

Research also indicates that the scale of the risk of harm to children and young people regarding online gambling is significant, given the extent of children's participation in simulated gambling games, in-game gambling scenarios and chance-based lotteries. For example, Australian research on children's attitudes to gambling⁵ noted evidence that 'approximately two thirds to three quarters of children will have participated in some form of gambling in their pre-teen and teenage years'. A survey of British children aged 11 to 16 years of age, undertaken for the UK Gambling Commission's 2017 report, *Young people and gambling 2017*⁶, found that 15 per cent of boys and seven per cent of girls had gambled with their own money in the week prior to the survey.

These statistics are alarming given claims that 'around 20 per cent of adults and adolescents who play simulated gambling games move to online commercial gambling'⁷, and that 'about a third of adult problem gamblers who seek treatment started gambling when they were 11-17 years old'.⁸ Research has also estimated that up to five per cent of young Australians will develop gambling problems before they are 25 years of age.⁹

Prevalence of gambling among young Australians

Research published since AHISA's 2018 submission, examined below, confirms that a large proportion of Australian children are participating in gambling activities and are therefore at risk of 'initiation', 'consumer socialisation' or 'immersion', with the potential of these experiences to lead to problem gambling.

Analyses of young Australians participating in successive waves of the Longitudinal Survey of Australian Children (LSAC), released as a chapter within the *LSAC Annual Statistical Report 2018*¹⁰, and most recently as Issue 7 of LSAC's *Snapshot Series*¹¹, found:

- Around 16 per cent of young people aged 16-17 years reported having spent money on at least one gambling activity in the past 12 months; two years later (at age 18-19) this had increased to 46 per cent.
- The most common gambling activity that 16-17 year-olds reported engaging in was private betting with friends or family (including activities with no legal age restrictions, such as cards or mahjong).
- Around one in four boys (24 per cent) and one in seven girls (15 per cent) aged 16-17 years reported having played gambling-like games in the past 12 months: around one in 10 boys, and less than one in 20 girls played either monthly or weekly; five per cent of boys and two per cent of girls played weekly or more often.
- Despite the legal age restrictions around race and sports betting in Australia, approximately five per cent of 16-17 year-olds reported gambling on these activities in the past 12 months: six per cent of boys and three per cent of girls had bet on sports, and four per cent of boys and three per cent of girls had bet on horse or dog races.
- Young people aged 16-17 who played simulated gambling games had a 40 percentage points higher probability of spending real money on gambling as young adults (aged 18-19).

Further to the last dot point from the LSAC analysis, according to a summary of research into gambling and young people prepared for the Victorian Responsible Gambling Foundation¹², the swift uptake of legal gambling among young adults is itself an indicator of the normalisation of gambling behaviours among adolescents:

[...] the effects of normalisation of sports betting among young people over recent years can be seen in the dramatically increased participation by young adults. While the rate of sports betting increased by around 20 per cent in the overall adult population between 2014 and 2018, it more than doubled in the 18 to 24-year-old age group, rising from 9.2 per cent to 21.9 per cent. In particular, the proportion of males aged 18 to 24 who reported gambling on sports increased from 14.6 per cent to 31.9 per cent. (Page 2)

The NSW Youth Gambling Study¹³, undertaken in 2020, involved focus groups and a survey. The study report notes:

How young people are engaging with gambling is changing. This change is being driven by rapid technological changes, the high-level of engagement of young people with mobile technology and video gaming, the increase in traditional and online gambling advertising, and the expanding scope and variety of games with monetary gambling opportunities. (Page 14)

Findings of the study include:

- On average, young people started simulated gambling and monetary gambling at much the same age (11-12 years).
- In the previous year, 29.8 per cent had participated in monetary gambling and 40.1 per cent had played games with gambling components.
- Games with gambling components included video games with 'mini' gambling components or 'loot boxes, gambling-themed apps from an app store, free demo games on real gambling websites or app, and games with gambling components on social networking sites'.

- One-third of those surveyed had spent money on micro-transactions (excluding loot boxes), averaging \$10 per month (maximum \$200).

The NSW study found the influence of parents and other family members on young people's gambling behaviours was found to be very strong:

- Gambling usually occurred with parents or guardians (53.7 per cent), followed by friends aged 17 or under (26.8 per cent), relatives aged 18 years or over (20.7 per cent), relatives under 18 years (20.1 per cent) and grandparents (19.5 per cent).
- Parents were the strongest influence on youth gambling: young people were more likely to have gambled in the past year if they had gambled with their parents during childhood and had parents who approved of gambling.
- A problem-gambling adult in the household when the young person was growing up was found to uniquely predict problem or at-risk gambling among youth survey respondents.

Problem gambling

LSAC analysis, as cited above, found that two per cent of 16-17 year-olds were at risk of, or already experiencing, gambling-related problems based on the Problem Gambling Severity Index; two years later, at age 18-19 years, nine per cent were classified as at risk of, or already experiencing, gambling-related problems – a four-fold increase.

In line with the LSAC findings, the 2020 NSW study found that the past-year problem-gambling rate among those participating in the study was 1.5 per cent, and another 2.2 per cent of adolescents were at-risk gamblers.

Analysis of responses to gambling-related questions that were added to the triennial Australian Secondary Students Alcohol and Drugs Survey (ASSAD) in 2017¹⁴ found that, while 1.4 per cent of all students participating in the survey were classified as problem gamblers, 5 per cent of students who had ever gambled, and 13 per cent of students who had gambled in the last month were classified as problem gamblers. (This analysis was based on criteria according to a modified version of the Diagnostic Statistical Manual IV, Multiple Response format, adapted for juveniles.)

A discussion paper examining gambling among adolescents¹⁵, prepared for the Victorian Responsible Gambling Foundation in 2017, drew on earlier research on the prevalence of problem gambling among teens to predict that rates of problem gambling among young people could be as much as five times higher than in adults, noting that '*behaviour not considered problematic in an adult may be considered problem gambling in a young person*'. The paper noted that harms could include poor academic performance, absenteeism from school, early school dropout, and disrupted relationships with family and friends.

Exposure to gambling advertising

The 2020 NSW study also collected data on exposure to gambling advertising, finding that nearly half of participants (46.1 per cent) reported noticing gambling advertising on TV during sports and racing events at least weekly. The study also found that '*exposure to gambling advertising in both traditional and digital media and thinking more positively about gambling due to seeing gambling advertisements were associated with gambling participation, intentions and problems*'.

Analysis of the 2017 ASSAD Survey, cited above, found that 73 per cent of students had been exposed to gambling advertisements on television in the past month, and that more than a third



of respondents were also aware of advertisements on radio, sporting scoreboards, websites or social media. This reported breadth of exposure more closely aligns with British research. The UK Gambling Commission's 2017 study, already cited, found that some 80 per cent of those surveyed had seen advertisements for gambling on television and 68 per cent had seen gambling advertising on social media and other websites.

A 2021 review of research undertaken for the Victorian Responsible Gambling Foundation¹⁶ notes the increase in expenditure on gambling advertising in Australia over the last decade (estimated to have grown from \$89.7 million in 2011 to \$271.3 million in 2020), despite restrictions on gambling advertising during televised sports matches between 5 am and 8.30 pm introduced in 2018.

The 2020 NSW study found that young people reported frequent exposure to gambling advertising, most commonly on television during sports and racing events (46.1 per cent), on television except during sports and racing events (42.9 per cent), and in online and social media (34.8 per cent).

A 2016 Victorian Responsible Gambling Foundation-funded study of 152 children¹⁷ explored recall of sports betting and gambling brand sponsorship of Australian Football League, National Rugby League and soccer teams. The study found that over two-thirds of children aged between 8 and 16 years recalled the name of at least one sports betting brand. Around one in five could identify three or more sports betting brands.

The Foundation's 2021 research review, already cited, notes that young people are not only exposed to online gambling advertising, they are actively engaged with the marketing efforts of gambling companies. The review references UK research which found that 10 per cent of 11-16 year-olds in Britain followed gambling companies on social media platforms such as Facebook, YouTube and Instagram. The review concludes: *'This is the first generation to be exposed to saturation marketing of online betting products.'* (Page 1)

2. Loot boxes and the definition of gambling for legislative and regulatory purposes

The final report of the Senate Environment and Communications References Committee's 2018 inquiry into gaming micro-transactions for chance-based items¹⁸ was disappointing, making no recommendations for regulatory action to protect children and young people. Instead, the report noted that 'a global consensus view on whether loot boxes constitute gambling has not been reached, nor has a uniform approach to dealing with the issue been adopted'.

In the previous section we presented recent research that young Australians continue to be at risk of harm or are suffering harm from exposure to online gambling. This risk is not abating but multiplying with the digitisation and consequent intersection of gambling and gaming. (The issue of crossover of gambling and gaming is examined by The Australia Institute in its discussion paper, *Gambling on gaming: How video games expose children to gambling*¹⁹ and in a comprehensive literature review conducted by the Victorian Responsible Gambling Foundation in 2018 and reported in *Online gaming and gambling in children and adolescents – Normalising gambling in cyber places*.²⁰)

Also worth noting is further evidence from the NSW Youth Gambling Study 2020²¹, which found that 72.2 per cent of respondents to the study survey had opened or purchased a loot box within the last 12 months, and that more respondents had spent money on loot boxes (36.5 per cent) than had participated in gambling (29.8 per cent). This could point to an additional harm factor in loot boxes – that gambling behaviour is encouraged by the gamer's desire to progress in their game. This is despite gamers' recognition – as expressed in the NSW study focus groups – that 'loot box purchasing could be expensive, risky and addictive':

Many were sceptical about paying for loot boxes due to the low odds of getting desirable items and because advertised odds could be deceptive. [...] Most thought purchasing loot boxes and betting with in-game items constituted gambling as they involved risking something of value on unknown outcomes with low odds.' (Page 4)

It is not only young people who are wary of loot boxes and view them as a form of gambling. In its 2018 survey of over 2,000 parents on a range of classification issues²², the Commonwealth Department of Communications and the Arts found that, among those parents who had some familiarity with loot boxes (46 per cent of all respondents), just over half agreed that loot boxes are akin to gambling and should be treated as such, and 48 per cent agreed that loot boxes are harmful to children and young people.

In the face of research evidence and consumer sentiment, lack of 'global consensus' on whether in-game loot boxes constitute gambling is not sufficient reason for the Australian Government to not take regulatory action when there is evidence of risk of harm to children and young people.

There are existing models of a regulatory approach, for example, action taken by the governments of Belgium and the Netherlands. Where the definition of within-game micro-transactions as gambling remains unresolved, British parliamentarians have recommended adoption of what they have termed a 'precautionary principle'.

The British House of Commons Select Committee on Culture, Media and Sport considered the issue of loot boxes in digital games as part of its inquiry into immersive and addictive technologies. In its report of 12 September 2019²³, the Select Committee recommended:

In the absence of research which proves that no harm is being done by exposing children to gambling through the purchasing of loot boxes then we believe the precautionary principle should apply and they are not permitted in games played by children until the evidence proves otherwise.

In the previous section we presented evidence that young Australians are at risk of harm from exposure to gambling and simulated gambling, with at least 1.2 per cent of young people classified as problem gambling.

The issue of young people and gambling continues to be a focus of research in Australia. For example, the NSW Office of Responsible Gambling notes in its current research program²⁴ that the NSW Youth Gambling Study 2022 involves qualitative research with young people in NSW aged 12 to 17 years. Analysis of gambling questions included in the Australian Secondary School Alcohol and Drug Survey administered this year to students in NSW is expected to be completed by May 2024. Given young people's higher level of engagement in online activity due to COVID lockdowns in 2020 and 2021, there is every likelihood that findings of research undertaken in 2022 will continue to reflect increased exposure to and engagement in online gambling and simulated gambling activity.

As research evidence of risk of harm to children and young people's exposure to gambling continues to mount, adoption by the Australian Government of a 'precautionary principle' in all matters relating to children and young people and gambling, including regulation, would flag a willingness to take a proactive approach to the protection of young Australians.

3. Raising the profile of gambling as a children's issue

Education and regulation both have a role to play in raising the profile of gambling as an issue affecting young Australians.

Informing and resourcing young people, parents and educators

The 2020 NSW Youth Gambling Study, already cited, found that '*parents were the greatest facilitators of adolescents' gambling, in venues and through use of parents' online gambling accounts*' (pages 109-110):

[Survey] respondents reported that their gambling usually occurred with parents (53.7 per cent), other adults (20.7 per cent) and grandparents (19.5 per cent). [. . .] Many respondents were also exposed to parental gambling. Over half the [survey] sample (58.3 per cent) reported being present when adults in their household gambled.

Other findings included:

- Respondents were less likely to gamble, intend to gamble or have a gambling problem if their parents disapproved of their gambling.
- Respondents were more likely to be a problem/at-risk gambler if adults in the household gambled with them, did not set limits on their online use, or had gambling problems themselves.
- A problem gambling adult in the household when growing up uniquely predicted problem/at-risk gambling amongst youth survey respondents.
- 10.4 per cent of respondents reported growing up in a household where they thought an adult had gambling problems (5.4 per cent 'minor gambling problems'; 2.3 per cent 'moderate gambling problems'; 2.8 per cent 'severe gambling problems').

The study authors recommend that, given parents are the strongest influence on youth gambling, they should be targeted in education and awareness efforts:

[Parents] should be advised against gambling with or in the presence of youth, or facilitating their gambling. Parents should be encouraged to monitor their children's engagement in gambling and simulated gambling and online use more generally, and discourage their use of social casino and demo games, purchasing loot boxes, and betting with in-game items. (Page 7)

The authors also have several recommendations for educating young people:

Youth education should emphasise that gambling is an adult activity and that underage gambling is illegal. Strategies could encourage appropriate peer gambling norms, for peers to discourage their friends from gambling, and encourage youth with lower wellbeing to engage in more positive coping strategies. Young people could be educated on the potential for simulated gambling to lead to gambling and gambling problems, and the importance of keeping their gaming in balance with other activities in their life. Youth services, gambling help and mental health services may also benefit from education about the risks of simulated gambling and gambling for young people. (Page 7)

The Australian Government's Student Wellbeing Hub²⁵ (developed and hosted by Education Services Australia) provides information and resources for young people, parents and educators

on a range of issues affecting the wellbeing of children and young people. Currently, there is no information on the site specifically targeting gambling. Resources developed by Education Services Australia (ESA) are highly regarded by educators, and the Australian Government could consider tasking ESA with the development of fact sheets and resources relating to young people and gambling suitable for educators, as well as information and resources for young people and parents. This would be an important first step in highlighting gambling as an activity that can have negative outcomes for children and young people, including when children are observing the gambling of their parents.

The Office of the eSafety Commissioner (eSafety)²⁶ already plays a significant role in providing information and resources on online safety issues to young people, parents and educators. Currently, gambling is not highlighted as a stand-alone online safety issue – it is addressed briefly within ‘gaming’ – and there are no specific resources dedicated to addressing gambling. Given eSafety’s national profile, the Australian Government could consider tasking eSafety with the development of fact sheets and resources relating to online gambling and highlighting gambling as a stand-alone issue.

Changes to Australian classification regulation

Irrespective of whether the Australian Government redefines ‘gambling services’ for the purposes of regulation or chooses to define particular forms of microtransactions within digital games (eg loot boxes) as contravening gambling legislation, the Government is able to strengthen the protections of children and young people through the National Classification Scheme.

The National Classification Scheme has educative value in alerting parents to issues that have the potential to negatively affect their children and guiding parents’ selection of media and games for their children as well as applying age restrictions on various categories of material.

The Interactive Games & Entertainment’s (IGEA) Digital Australia 2022 report²⁷ found that 47 per cent of all adults reported that they were ‘completely familiar’ with classification labels, 37 per cent were ‘mostly familiar’, 11 per cent were ‘vaguely familiar’ and 5 per cent were ‘not familiar’. A further question revealed that, while most adults were confident about their understanding of the legal status of G (95 per cent), PG (92 per cent), M (81 per cent) and R18+ (83 per cent) classifications, only 44 per cent of adults accurately understood the legal status of the MA15+ classification. This result, however, appears to be a remarkable improvement on the findings of the 2020 Digital Australia report²⁸, which showed a fifth of adults were unclear about the meaning of the G and PG classifications, 28 per cent were unclear about the meaning of the M and MA15+ classifications and 28 per cent unclear about the R18+ classification.

IGEA’s Digital Australia 2020 report found that 31 per cent of parents agreed that the classification of a digital game had ‘a lot of influence’ on the games they choose for their children to play, and 26 per cent of parents reported classifications had ‘reasonable influence’, while 44 per cent reported classifications had ‘a little’ or ‘no’ influence. Unfortunately, the question was not repeated in the 2022 survey, but the increased understanding of the legal status of classifications shown by the 2022 survey results may indicate that classifications now have greater influence in parents’ regulation of their children’s viewing and gaming activities.

It is worth noting that the IGEA Digital Australia 2020 report found that gambling was consistently ranked as among the top 10 elements of concern reported by parents across movies, interactive games and social media, with loot boxes and in-game purchases topping the list of parents’ concerns about video games.



The 2018 Department of Communications and the Arts classification survey on loot boxes and simulated gambling in games, already cited, found that parents were more likely to advocate restrictions on purely simulated gambling games (20 per cent nominating MA15+ and 40 per cent R18+ restrictions) than restrict viewing of games containing loot boxes (12 per cent nominating MA15+ and 5 per cent R18+), even though over half agreed that loot boxes were akin to gambling and should be treated as such. This suggests that, while parents are concerned by the issue of gambling, they are most concerned by the dominance of gambling or gambling-like action within games when it comes to the games they are comfortable allowing their children to play.

This points to the importance of the current practice of identifying 'simulated gambling' with M classifications of computer games although, to minimise parent confusion and support confidence in classifications, further review may be warranted when apparent contradictions in classification occur. For example, *Zynga Poker – Texas* is classified M (simulated gambling, online interactivity) while the 'hack' for the game which offers a free gambling stake (*Free Zynga Casino Tokens Poker Texas Holdem prank*) is currently classified as G.²⁹

In its submission to the 2020 departmental review of Australian classification regulation, AHISA supported the proposition of Children & Media Australia that an age-related classification system be adopted. If the meaning of classifications is able to be understood more intuitively, it is possible that classifications will have greater influence on parents' choices of digital games for their children. ■

NOTES

¹ AHISA's submission is posted at

https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions_2018/Gaming_micro-transactions_for_chance-based_items.aspx

² AHISA's submission is posted at

https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions_2020/Review_of_Australian_classification_regulation.aspx.

³ Dickins M & Thomas A (2016) *Is it gambling or a game? Simulated gambling games: Their use and regulation*. Australian Gambling Research Centre. Accessed at <https://apo.org.au/node/63414>.

⁴ Blaszczynski A, Anjoul F, Shannon K, Keen B, Pickering D & Wiecezorek M (2015) *Gambling harm minimisation report*. Report commissioned by the NSW Department of Trade and Investment, Regional Infrastructure and Services via the NSW Office of Liquor, Gambling and Racing's Responsible Gambling Fund. Accessed at <https://www.gambleaware.nsw.gov.au/-/media/files/gambling-harm-minimisation-report.ashx?rev=5edce03e72ed46ab94d638995e5a2ee3>.

⁵ Pitt H, Thomas S, Bestman A, Daube M & Derevensky J (2017) Factors that influence children's gambling attitudes and consumption intentions: Lessons for gambling harm prevention research, policies and advocacy strategies. *Harm Reduction Journal*, doi 10.1 186/s12954-017-0136-3. Accessed at <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-017-0136-3>.

⁶ UK Gambling Commission (2017) *Young people and gambling 2017: A research study among 11-16 year olds in Great Britain*. Accessed at <http://www.gamblingcommission.gov.uk>.

⁷ Dickins & Thomas, op. cit.

⁸ Stated in the section, 'Risks associated with gambling' on the raisingchildren.net.au website, at <http://raisingchildren.net.au/articles/gambling.html>.

⁹ McGaurr L (2015) *Youth gambling in Australia*. Face the Facts Briefing, published by the Australian Clearinghouse for Youth Studies, University of Tasmania.

¹⁰ Warren D & Yu M (2019) *Growing Up in Australia: The Longitudinal Study of Australian Children (LSAC) Annual Statistical Report 2018*. Chapter 7: Gambling activity among teenagers and their parents. Accessed at <https://growingupinaustralia.gov.au/research-findings/annual-statistical-reports-2018>.

¹¹ Sakata K & Jenkinson R (2022) What is the link between video gaming and gambling? *Snapshot Series*, Issue 7. Accessed at <https://growingupinaustralia.gov.au/research-findings/snapshots/what-link-between-video-gaming-and-gambling>.

¹² Duffy L (2021) *Gen bet: a plain English summary of research into gambling and young people*. Victorian Responsible Gambling Foundation, Melbourne. Accessed at <https://responsiblegambling.vic.gov.au/resources/publications/gen-bet-a-plain-english-summary-of-research-into-gambling-and-young-people-990/>.

¹³ Hing N, Russell, A, King D, Rockloff M, Browne M, Greer N, Newall P, Sproston K, Chen L & Coughlin S (2021) *NSW Youth Gambling Study 2020*. Prepared for the NSW Responsible Gambling Fund. Accessed at <https://www.gambleaware.nsw.gov.au/resources-and-education/check-out-our-research/published-research/nsw-youth-gambling-study-2020>.

¹⁴ Freund M, Noble N, Hill D, White V, Evans T, Oldmeadow C & Sanson-Fisher R (2019) *The prevalence and correlates of gambling in secondary school students in Victoria, Australia, 2017*. Victorian Responsible Gambling Foundation, Melbourne. Accessed at <https://responsiblegambling.vic.gov.au/resources/publications/the-prevalence-and-correlates-of-gambling-in-secondary-school-students-in-victoria-australia-2017-680/>.

¹⁵ Miller H (2017) *Gen Bet: Has gambling gatecrashed our teens?* Victorian Responsible Gambling Foundation, Melbourne. Accessed at <https://responsiblegambling.vic.gov.au/resources/publications/gen-bet-has-gambling-gatecrashed-our-teens-16/>.

¹⁶ Duffy L, op cit, pp 7-8.

¹⁷ Thomas SL, Pitt H, Bestman A, Randle M, Daube M & Pettigrew S (2016) *Child and parent recall of gambling sponsorship in Australian sport*. Victorian Responsible Gambling Foundation, Melbourne. Accessed at <https://responsiblegambling.vic.gov.au/resources/publications/child-and-parent-recall-of-gambling-sponsorship-in-australian-sport-67/>.

¹⁸ The report is published at https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Gamingmicro-transactions/Report.

¹⁹ Browne B (2020) *Gambling on gaming: How video games expose children to gambling* Accessed at [P860-Risks-to-kids-from-video-games-Web.pdf \(australiainstitute.org.au\)](https://australiainstitute.org.au/P860-Risks-to-kids-from-video-games-Web.pdf)

²⁰ King D (2018) *Online gaming and gambling in children and adolescents – Normalising gambling in cyber places*. Victorian Responsible Gambling Foundation, Melbourne. Accessed at <https://responsiblegambling.vic.gov.au/resources/publications/online-gaming-and-gambling-in-children-and-adolescents-normalising-gambling-in-cyber-places-479/>.

²¹ Hing et al, op cit, page 86.

²² Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts (2018) *Classification survey results: loot boxes and simulated gambling in games*. Accessed at <https://www.classification.gov.au/about-us/research-and-publications/classification-survey-results-loot-boxes-and-simulated-gambling-games>.

²³ The report is published at <https://publications.parliament.uk/pa/cm201719/cmselect/cmcumeds/1846/184602.htm> [CHECK]

²⁴ Viewed at <https://www.gambleaware.nsw.gov.au/resources-and-education/check-out-our-research/research-currently-underway>.

²⁵ Accessed at <https://studentwellbeinghub.edu.au/>.

²⁶ Accessed at <https://www.esafety.gov.au/>.

²⁷ Accessed at <https://igea.net/2021/10/digital-australia-2022-da22-connected-by-games/>

²⁸ Accessed at <https://igea.net/2019/07/digital-australia-2020-da20/>

²⁹ Viewed at <https://www.classification.gov.au/titles/free-zynga-casino-tokens-poker-texas-holdem-prank>.