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## AMA submission to the Parliamentary Inquiry into online gambling and its impacts on those experiencing gambling harm

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### Introduction

The Australian Medical Association (AMA) is pleased to have the opportunity to make a submission to the *Inquiry into online gambling and its impacts on those experiencing gambling harm*, being undertaken by the House of Representatives Standing Committee on Social Policy and Legal Affairs.

We acknowledge that gambling can harm the wellbeing of individuals and families in a range of ways including through adversely impacting mental health, physical health, financial security, and relationships. Gambling is big business – with gambling losses in Australia being estimated at around \$25 billion in 2018.<sup>1</sup>

The AMA's submission will be responding to the following four terms of reference:

1. How to better target programs to address online gambling harms to reduce the potential exploitation of at-risk people, and protect individuals, families and communities.
2. The impact of current regulatory and licensing regimes for online gambling on the effectiveness of harm minimisation and consumer protection efforts.
3. The effectiveness of current gambling advertising restrictions on limiting children's exposure to gambling products and services (e.g., promotion of betting odds during live sport broadcasts), including consideration of the impact of advertising through social media, sponsorship or branding from online licensed gambling operators.
4. Any other related matters.

### The role of the medical profession in addressing gambling addiction as a public health issue

The AMA is very concerned by the increased prevalence of online gambling platforms and the resultant harms to public health and mental and emotional wellbeing. Like all addictions – gambling needs to be understood as a health issue, free of stigma, with appropriate treatment and support offered by qualified health professionals.

In our position statement; *Health Effects of Problem Gambling* (position statement), the AMA acknowledged that medical practitioners have a role to play in talking with patients about gambling harms, noting that people seek help in a range of ways and can present with other physical and mental health problems. Although now almost ten years old – the recommendations regarding medical practitioners from this position statement remain relevant to this Inquiry:

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## Australian Medical Association

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- Medical practitioners should be aware of the potential adverse impacts of harmful gambling on the physical and mental health of individuals and their families. Patients experiencing harmful gambling may present with symptoms that appear unrelated to gambling. Other patients may present with health-related concerns arising from a family member's gambling problem.
- Medical practitioners should consider including gambling as part of their systematic lifestyle risk assessment when taking a medical history.
- Where a gambling problem is suspected, a psychosocial assessment should be undertaken.
- Where relevant, a shared-care approach to the case management of people with gambling problems and their families may be developed. The general practitioner can be assisted by community agencies such as gambling intervention and counselling services, community mental health, relationship counselling, alcohol and drug services, financial advisory services and legal services.
- Information kits which include screening and assessment questionnaires should be available to all medical practitioners, especially general practitioners, to help identify, manage and refer patients affected by gambling harm.
- Undergraduate and postgraduate medical education courses should include the recognition of gambling as a health issue. Medical practitioners are encouraged to participate in continuing education related to the detection and management of the adverse health effects of harmful gambling.

The AMA suggests that it is important for this Inquiry to consider how to support and resource the health profession to treat harmful gambling in your final recommendations.

[How to better target programs to address online gambling to reduce the potential exploitation of at-risk people, and protect individuals, families and communities](#)

The AMA recommends that dynamic, responsive and evidence-based support programs are needed to protect individuals, families and the community from the harms of online gambling. These programs need to target the various platforms that online gambling occurs and be appropriate for diverse ages, linguistic groups and population cohorts. Support programs need to both target prevention as well as treat addiction. It is essential that gambling addiction is understood from a public health perspective in program design and delivery.

We suggest that enhanced data collection and coordination at the national level is important to understand the prevalence of online gambling and inform an appropriate government-led response, including one that targets all forms of online gambling. In particular, understanding the impacts of Covid-19 lockdowns on gambling behaviours is important to inform current policy settings, and plan for the future, noting the pandemic is not yet over.

The Australian Gambling and Research Centre reports a decrease in land-based gambling activity during Covid-19 restrictions, but an overall increase in gambling activity from the same survey participants for that period.<sup>2</sup> Almost 1 in 3 survey respondents signed up for a new online betting account during Covid-19 and 1 in 20 started gambling online.<sup>3</sup> The AMA notes with concern that young men (18-24) were the most likely cohort to sign up for new accounts, increase their monthly spend on gambling and be at risk of gambling related harm.<sup>4</sup>

The AMA's current policy acknowledges all governments have a role to play in curbing harmful gambling in the community and we recommend the following suite of actions:

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Australian Medical Association

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- Adequate and recurrent funding should be provided by state and territory governments to support research, prevention, detection, early intervention and treatment and rehabilitation programs for people experiencing gambling harms.
- Support enhanced systematic linkages and referral pathways between health, welfare, and problem gambling services.
- Ensure the provision of recurrent resources for specialised training for community and health care workers.
- Invest in targeted early intervention and treatment services for at-risk groups and communities, including for people from Aboriginal and Torres Strait Islander backgrounds, young people, people from non-English speaking backgrounds, and populations with low literacy and low-income levels.

In the context of 2022, we acknowledge that the landscape of gambling has become more complex, with the expansion of online gambling platforms, the impacts of Covid-19 lockdowns, the relationship between gambling and professional sport, childrens' recreational use of online gaming, lax regulatory frameworks around gambling advertising and rapidly evolving digital technology. We emphasise the following priorities to be taken into consideration for support program development:

- Educational gambling prevention programs are needed to inform children and young people of the harms of gambling. These programs must be designed in a way that engages young people and uses appropriate language, messaging and digital information platforms. The AMA suggests that these should be developed in partnership with education departments and include support resources for parents to talk with their children around their use of digital media.
- Community centred programs have the ability to change attitudes surrounding gambling and help destigmatise it. These programs can be implemented in a variety of places, including sports clubs and community hubs.
- Destigmatising of addiction more broadly, should be a major focus of these targeted programs. Recognising that addiction is a health issue, not a criminal issue, means that help-seeking behaviour becomes normalised, and there is scope for the health profession to support with this.

The AMA respectfully suggests that funding for these programs could be drawn from the gambling industries revenue, which as stated above - was estimated to be in the range of \$25 billion during the 2018-19 period. We also note that it is imperative that all vested interests in gambling support programs and public health interventions are transparent, and that commercial interests need to be separated from individual and community well-being.<sup>5</sup>

#### [The impact of current regulatory and licensing regimes for online gambling on the effectiveness of harm minimisation and consumer protection efforts](#)

There is little evidence to suggest that current regulations and licensing regimes for online gambling have been effective in helping harm minimisation and consumer protection efforts. Almost ten years ago - the AMA called on the Commonwealth Government to develop a national strategy on problem gambling. This included a call for establishment of an independent gambling regulator, tasked with providing national regulatory oversight. We assert this remains as relevant in 2023 – with little progress to note on gambling regulation over the intervening decade.

## Australian Medical Association

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The AMA also recommends that this oversight should include the regulation of product safety standards, to ensure that gaming machines and other online gambling products comply with consumer protection and incorporate harm minimisation measures to reduce the risk of gambling harm.

The AMA supports further research into online gambling prevalence and habits to further inform the government response to regulatory reform and the design of various interventions to prevent harmful gambling. We suggest that further research into the digital engagement of children and young people relating to gambling is urgently needed. Better research is also needed surrounding advertising and prohibiting the targeted marketing of gambling and gambling products to children and adolescents. This research should analyse the use of social media, sports betting, and simulated gambling activities in advertising to inform appropriate regulatory and compliance measures.

The AMA calls for stronger enforcement of marketing associated with online gambling, including the prohibition of advertising during televised sporting events, prohibition of sports sponsorship by the gambling industry, and banning promotions and inducements targeting children and young people.

[The effectiveness of current gambling advertising restrictions on limiting children's exposure to gambling products and services \(e.g. promotion of betting odds during live sport broadcasts\), including consideration of the impact of advertising through social media, sponsorship or branding from online licenced gambling operators](#)

The AMA acknowledges the specific harms that online gambling presents to children and young people. *Growing Up In Australia* Longitudinal Study of Australian Children data released in 2022, reported that 16% of Australians aged 16 and 17 participated in under-age gambling. The same study also found that 2% of this age group were classified as being at risk of experiencing or having already experienced gambling harm.<sup>6</sup> Children are also at risk, due to their parents' interaction with gambling.<sup>7</sup> The vastness of gambling options, ease of access and advertisement enticement, shows there is a need to more actively protect children from the harms of gambling.

Current legislative frameworks look to control gambling advertising, with attempts at harm minimisation. The *Interactive Gambling Act 2001* regulates the advertising of gambling services that takes place online, through websites, apps and telephones.<sup>8</sup> *The National Consumer Protection Framework for Online Wagering in Australia 2018*, which was updated in 2022, is a nationally consistent list of consumer protection measures, with the objective of minimising interactive gambling harm for consumers.<sup>9</sup> Both legislative frameworks can protect consumers, especially children, when enforced appropriately. With the ever-changing online space, these frameworks need to be updated frequently, and advertising avenues monitored for illegal promotional behaviour. It is encouraging to see the new advertising requirements for online betting agencies, which enforces promotion of the risks of online wagering.<sup>10</sup>

In addition to the growing diversity and accessibility of gambling activities, advertising and marketing have contributed to the normalisation of gambling. Young people are particularly susceptible to interactive gambling, and the integration of sports-betting advertising in television broadcasts and the prominent display of internet signs on playing grounds have accelerated the interest<sup>11</sup> and the growth of gambling problems among younger age cohorts. The television timeslots and online spaces where advertising is being displayed has changed and children have acknowledged this growth in gambling advertising.<sup>12</sup> The convergence of gambling and social networking has also led to the development of gambling-themed games on social media websites that target children and adolescents.<sup>13</sup> These games typically feature advertising and links to gambling websites and serve to familiarise users with the principles and mechanics of gambling.

## Australian Medical Association

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The AMA does not support any commercial relationship between the gambling industry and sporting events. We note the recent example of the Seven and Nine Networks being fined for showing betting advertising during recent sport broadcasts. During the Seven Network's broadcasting of the Olympics, 49 betting promotions were shown on live television, with other also broadcast on the network's online streaming platform.<sup>14</sup> Recent studies in Victoria alone, indicate that 948 gambling adverts were played on television daily in 2021, an increase of 253% since 2016.<sup>15</sup> The links between the gambling industry and sport sponsorship do not align with public health principles. The AMA does not support this level of exposure to gambling for children and young people, and we acknowledge the discussion underway, being led by young people to turn this around.<sup>16</sup>

The AMA notes the rapid developments in online gaming and the prevalence of use amongst children. Online, or interactive, gaming uses technologies such as 'skins' and 'loot boxes' which are very similar in aesthetics and techniques to other gambling products.<sup>17</sup> They also allow children to use money for intangible goods, such as loot boxes, which can cause economic and health harm.<sup>18</sup> This is resulting in increased Internet Gaming Disorder prevalence in the community, which leads to harmful gambling behaviours.<sup>19</sup> Online gaming, as well as being its own problem, is a gateway to gambling addiction.<sup>20</sup> Children are targeted early in life, with an increased risk of lifelong addictive behaviours and social, economic and health impacts.

### Any Other Related Matters

The AMA acknowledges that the social, physical and mental health of people who undertake in harmful levels of online gambling – and that of their families – is often at risk as a result of reduced household income and social disruption. Harmful gambling can be linked to high levels of comorbid mental health disorders and substance abuse. Other adverse effects of gambling and addiction more broadly include family breakdown, domestic violence, criminal activity, disruption to or loss of employment, and social isolation.

In 2022, we understand the multitude of health, social, climate and economic challenges that impact all our lives. We ask that this inquiry takes a particular focus on how disadvantaged groups are particularly vulnerable to harmful gambling and that the intersectionality of addiction with other issues is also well understood and considered. Children and young people should not be gambling or exposed to advertising and marketing that is encouraging them to do so. We hope this Inquiry leads to meaningful and contemporary reform and action in this important area of health and social policy.

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References

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- <sup>1</sup> Australian Gambling Research Centre (2021). *Gambling in Australia*. Retrieved 31/10/22 from: <https://www.aihw.gov.au/reports/australias-welfare/gambling>
- <sup>2</sup> Australian Gambling Research Centre (citing Jenkinson et al.2020) *Gambling in Australia*. Retrieved 31/10/22 from: <https://www.aihw.gov.au/reports/australias-welfare/gambling>
- <sup>3</sup> *Ibid.*
- <sup>4</sup> *Ibid.*
- <sup>5</sup> Cowlshaw, S et al. (2022). Problem Gambling: individual interventions in a public health context, In *InSight+ Medical Journal of Australia*. Retrieved 02/22/22 from: <https://insightplus.mja.com.au/2022/42/problem-gambling-individual-interventions-in-public-health-context/>
- <sup>6</sup> Growing Up in Australia (2022). *What is the Link Between Video Gaming and Gambling*. Retrieved 01/11/22 from: <https://growingupinaustralia.gov.au/research-findings/snapshots/what-link-between-video-gaming-and-gambling>
- <sup>7</sup> Suomi, A. & Watson, N. & Butterworth, P. (2022). How many children are exposed to at-risk parental gambling in Australia? Results from a representative national sample. *Addictive Behaviors*. 130. 107305. DOI: 10.1016/j.addbeh.2022.107305
- <sup>8</sup> ACMA (2022). *Interactive Gambling Act*. Retrieved 01/11/22 from: <https://www.acma.gov.au/about-interactive-gambling-act>.
- <sup>9</sup> Department of Social Services (2022) *National Consumer Protection Framework for Online Wagering National Policy Statement*. Retrieved 01/11/22 from: <https://www.dss.gov.au/communities-and-vulnerable-people-programs-services-gambling/national-consumer-protection-framework-for-online-wagering-national-policy-statement>
- <sup>10</sup> Josh Butler (2022) 'You lose more': Australia to force online gambling ads to include messages on potential harms. Retrieved 02/11/22 from: <https://www.theguardian.com/australia-news/2022/nov/02/you-lose-more-australia-to-force-online-gambling-ads-to-include-messages-on-potential-harms>
- <sup>11</sup> Pitt, H., Thomas, S. L., Bestman, A., Daube, M., & Derevensky, J. (2017). What do children observe and learn from televised sports betting advertisements? A qualitative study among Australian children. *Australian and New Zealand journal of public health*, 41(6), 604–610. doi:10.1111/1753-6405.12728
- <sup>12</sup> Thomas, S.L., Bestman, A., Pitt, H. et al. (2018) Young people's awareness of the timing and placement of gambling advertising on traditional and social media platforms: a study of 11–16-year-olds in Australia. *Harm Reduct J* 15, 51. doi:10.1186/s12954-018-0254-6.
- <sup>13</sup> Kei Sakata and Rebecca Jenkinson (2022). *What is the Link Between Video Gaming and Gambling*. Retrieved 01/11/22 from: <https://growingupinaustralia.gov.au/research-findings/snapshots/what-link-between-video-gaming-and-gambling>
- <sup>14</sup> ACMA (2022) *Seven and Nine breach gambling advertising rules*. Retrieved 01/11/22 from: <https://www.acma.gov.au/articles/2022-10/seven-and-nine-breach-gambling-advertising-rules>
- <sup>15</sup> VRGF (2022) *Gambling Advertising*. Retrieved 01/11/22 from: <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/gambling-advertising/>

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Australian Medical Association

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<sup>16</sup> Pitt, H., Thomas, S.L., Randle, M. *et al.* (2022) Young people in Australia discuss strategies for preventing the normalisation of gambling and reducing gambling harm. *BMC Public Health* **22**, 956. doi:10.1186/s12889-022-13201-0.

<sup>17</sup> Abarbanel, B., Gainsbury, S.M., King, D., Hing, N. and Delfabbro, P.H. (2017), Gambling Games on Social Platforms: How Do Advertisements for Social Casino Games Target Young Adults? *Policy & Internet*, 9: 184-209. doi:10.1002/poi3.135.

<sup>18</sup> Rockloff, M. & Russell, A. & Greer, N. & Lole, L. & Hing, N. & Browne, M. (2021). Young people who purchase loot boxes are more likely to have gambling problems: An online survey of adolescents and young adults living in NSW Australia. *Journal of Behavioral Addictions*. 10. 10.1556. doi:10.1556/2006.2021.00007

<sup>19</sup> Drummond, A., Sauer, J. D., Ferguson, C. J., & Hall, L. C. (2020). The relationship between problem gambling, excessive gaming, psychological distress and spending on loot boxes in Aotearoa New Zealand, Australia, and the United States-A cross-national survey. *PloS one*, 15(3), e0230378. doi:10.1371/journal.pone.0230378.

<sup>20</sup> Delfabbro, P. & King, D. (2020) Gaming-gambling convergence: evaluating evidence for the 'gateway' hypothesis, *International Gambling Studies*, 20:3, 380 392. doi:10.1080/14459795.2020.1768430.