

Ms Lyn Beverley
Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House

9 November 2012

Dear Ms Beverley,

Thank you for the invitation from the Secretariat to offer my thoughts about the proposed *National Gambling Reform Bill 2012*.

I would like to offer three points for consideration by the Committee.

1. Firstly, it does not appear that the Bill considers how pre-commitment systems may be linked by the gambling industry to any new or existing loyalty or incentive schemes. From a health promotion and public health perspective, linking harm minimisation schemes to industry based incentivisation schemes is extremely problematic. It may send conflicting messages about gambling to individuals, and may also enable industry to collect extensive data about the consumption patterns of individuals (both of gambling and other products within venues), which may enable them to more effectively target individuals. It is important that the Government considers how pre-commitment can run independently and be protected from the influence of such schemes.

2. It is important to note that social marketing and education initiatives will be an important part of the implementation of the scheme. As the proposed pre-commitment scheme is one which seeks to encourage individuals to make 'responsible' choices about their gambling, education and social marketing initiatives will be essential in educating and encouraging individuals to use the new technology. These social marketing initiatives (which must be broader than campaigning) will be necessary in providing accurate, targeted and tailored information to the community about the scheme. Social marketing and education schemes should consider the range of factors that may encourage and prohibit individuals from using the scheme. For example, given that most pre-commitment schemes at this stage will be voluntary rather than mandatory, it may be that individuals choose not to use the scheme for fear of being stigmatised as someone who may potentially have a problem with 'losing control' with gambling. Social marketing has a clear ethical dimension, and as such, it is important that any social marketing and education schemes are developed independently of industry, and are regularly evaluated to ensure their effectiveness.

3. Finally, I welcome the establishment of a dedicated research institute for the study of gambling issues. This provides an exciting opportunity for Australian academics to lead the

world in high quality, innovative research in the field of gambling. As we have learned from many other public health issues, it will be important that the research institute is independent from the interests of the gambling industry. This includes ensuring that representatives of the gambling industry are not appointed to the board of the institute or any of its subcommittees – either through direct industry appointments, or through the appointments of academics or community groups who have existing or previous funding links to the gambling industry. Further detail is required in the Bill about the make up of the Board of the Gambling Institute to ensure its independence.

I would be happy to answer any questions or provide more detail to the Committee if needed.

Yours sincerely,

Dr Samantha Thomas