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To Whom It May Concern

Interactive Gambling Amendment Bill 2016

The Australian Psychological Society (APS) welcomes the invitation to respond to the Interactive Gambling Amendment Bill 2016, which contains proposed amendments to the *Interactive Gambling Act 2001* (the IGA) that seek to clarify the law regarding illegal offshore gambling and strengthen the enforcement mechanisms under the IGA. Unfortunately given the short timelines, the APS is unable to make a full submission.

A key goal of the APS is to actively contribute psychological knowledge for the promotion and enhancement of community wellbeing. Gambling-related harm is an area in which the APS takes a keen interest. There is an urgent need to look at the impact of gambling on society as a whole, and what can be done to reduce the potential for gambling-related harm. The APS has consequently developed a number of resources, including a Position Statement (2012) and Review Paper (2010), based on major developments in understanding gambling from a psychological perspective.

We also refer the Committee to our previous and relevant submissions:

- [Interactive Gambling Amendment \(Sports Betting Reform\) Bill](#) (February 2016)
- [Interactive Gambling Amendment \(Virtual Credits\) Bill](#) (May 2013)

In summary, the APS endorses a public health framework which includes strong consumer protection measures. This takes into account how gambling technologies and other aspects of the gambling environment and regulatory system can lead to harmful outcomes for gamblers (Dickerson, 2003).

Prevalence studies suggest that people who have gambled online at some stage in the past tend, on average, to have considerably higher rates of problem gambling than people who have never gambled online (Wood & Williams, 2009) and that people who gamble on the internet are likely to have a gambling problem (Ladd & Petry, 2002). Together with findings from longitudinal studies, Wood and colleagues (2012) concluded that while many problem gamblers gravitate to internet gambling, internet gambling more commonly precedes or co-occurs with problem gambling.

The APS cannot comment on the legal aspects of the Bill. However, the APS is aware that internet access poses unique problems for national regulation and regulation of access, particularly by minors (APS, 2010), and is therefore pleased that the limited harm minimisation and consumer protection measures offered by offshore gambling providers were identified as a major concern in the *2015 Review of the impact of illegal offshore wagering*. It is imperative that groups who are already disadvantaged and vulnerable are protected from possible harms caused by interactive gambling.

Young people are the next generation of gamblers and it is inevitable that they will be targeted by increasingly sophisticated strategies to participate. Their potential vulnerability, at a point in time when mental health issues are the most prevalent, and life time costs of gambling addiction from an early age so high, that this should warrant a conservative approach in drawing up legislation that protects their interests as a priority.

In our previous submission (February 2016), the APS noted that the most frequently identified aspects of internet gambling leading to impaired control were use of digital money, access to credit, lack of scrutiny and ready accessibility. The Bill's proposed measure to prohibit 'click to call' in-play betting services by tightening the definition of a 'telephone betting service' to require dealings with customers to be wholly by way of spoken conversations between individuals is a good example of disruption of ready accessibility as a harm minimisation measure.

The APS encourages the Government to continue to keep gambling-related harm at the forefront of their decision-making, and to take account of the risk that legalisation, however it is regulated, risks amplifying gambling participation in all its forms.

For further information please contact me on

Yours sincerely,

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Manager, Public Interest
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References

Australian Psychological Society (2012). Gambling-related harm: A Position Statement prepared for the Australian Psychological Society. Melbourne, Australia. <http://www.psychology.org.au/Assets/Files/APS-Gambling-Related-Harm-Position-Statement.pdf>

Australian Psychological Society (2010). The psychology of gambling. A review paper prepared for the Australian Psychological Society. Melbourne, Australia. <http://www.psychology.org.au/Assets/Files/APS-Gambling-Paper-2010.pdf>

Dickerson, M. (2003). Exploring the limits of 'Responsible Gambling': Harm minimisation or consumer protection? Proceedings of the 12th Annual Conference of the National Association for Gambling Studies, Melbourne.

Ladd, G. & Petry, N. (2002). Disordered gambling among university-based medical and dental patients: A focus on internet gambling. *Psychology of Addictive Behaviours*, 16 (1), 76-79.

Wood, R.T., & Williams, R.J. (2009). Internet Gambling: Prevalence, Patterns, Problems, and Policy Options. Final Report prepared for the Ontario Problem Gambling Research Centre, Guelph. Ontario, Canada.

Wood, R.T., Williams, R.J. & Parke, J. (2012). The relationship between problem gambling and Internet gambling. In R.J. Williams, R.T. Wood and J. Parke (Eds.), *Routledge International Handbook of Internet Gambling* (pp. 200-211). London: Routledge.

About the Australian Psychological Society

The APS is the premier professional association for psychologists in Australia, representing more than 22,000 members. Psychology is a discipline that systematically addresses the many facets of human experience and functioning at individual, family and societal levels. Psychology covers many highly specialised areas, but all psychologists share foundational training in human development and the constructs of healthy functioning. A key goal of the APS is to actively contribute psychological knowledge for the promotion and enhancement of community wellbeing. Psychologists apply their skills and knowledge to enhance understandings of the individual, family and systemic issues that contribute to social problems, and to find better ways of addressing such problems.

APS Gambling-related Harm Resources

Resources and information about gambling-related harm can be accessed at the APS webpage: <http://www.psychology.org.au/Content.aspx?ID=5218>

Publications

- 2012 [Position Statement on Gambling-related Harm](#)
- 2010 Review Paper - [The Psychology of Gambling](#)

InPsych (bimonthly bulletin)

- [APS cites psychological science at climate, marriage equality and gambling inquiries](#) (June 2012)
- [Special report: The psychology of gambling](#) (December 2010)
- [How psychologists are helping problem gamblers](#) (October 2003)

Submissions

- [Victorian Gaming Machine Arrangements Review Consultation Paper](#) (March 2016)
- [Interactive Gambling Amendment \(Sports Betting Reform\) Bill](#) (February 2016)
- [Interactive Gambling Amendment \(Virtual Credits\) Bill](#) (May 2013)
- [Inquiry into Advertising and Promotion of Gambling in Sport](#) (March 2013)
- [National Gambling Reform Bill 2012 and other related Bills](#) (November 2012)
- [Submission to the Australian Government, Department of Broadband, Communications and the Digital Economy's Interim Report of the Review of the Interactive Gambling Act 2001](#) (2012)
- [Inquiry into the prevention and treatment of problem gambling](#) (April 2012)