

The logo for St Luke's, featuring the name in a white, cursive script font on a blue rectangular background.

St Luke's

RESPECT | HOPE | FAIRNESS

ST LUKE'S ANGLICARE SUBMISSION

INQUIRY INTO THE PREVENTION & TREATMENT OF PROBLEM GAMBLING

March 22, 2012

INTRODUCTION

St Luke's Anglicare welcomes an opportunity to make a submission to the Federal Government to inform the Inquiry into the Prevention and Treatment of Problem Gambling. As a large regional based community sector organisation, with strong connections to people experiencing social and economic disadvantage in rural Victoria and southern NSW, we are acutely aware of the community vulnerability to problem gambling, particularly in relation to gambling through Electronic Gaming machines (EGM's). The adverse impacts from EGM's are well known and documented through both research publications and the Productivity Commission review of Gambling in 2009. Our work in the area of financial inclusion already has us witnessing firsthand the impacts of problem gambling, including family breakdown, increased suicide rates, loss of employment and housing, and food insecurity, plus shame and humiliation. We believe that the social policy environment in Australia should aim to minimise the known effects of problem gambling and we acknowledge it will take courage to shift the paradigm in which governments are financially dependent on gambling revenues and truly commit to preventing and treating problem gambling as a priority over gambling venues revenues.

Who is St Luke's Anglicare?

St Luke's was established in 1979 by the Anglican Church with the support and cooperation of the Uniting Church. It works in support of the Anglican Diocese of Bendigo's mission – to respond to human need by loving service, and to seek to transform unjust structures of society. Since 1979, we have expanded well beyond Bendigo. We now have over 300 staff working with our clients across the Loddon Mallee and Riverina regions, with offices in Albury, Bendigo, Castlemaine, Deniliquin, Echuca, Kyneton, Maryborough and Swan Hill. St Luke's Strategic Plan 2011-2013 includes our purpose, which is to assist people to make positive changes in their lives, be connected and contribute to their communities. We strive for an inclusive, welcoming and just society. Our values of respect, hope and fairness means we adopt goals which include advocating and influencing for a fairer community.

Our services include:

- Children, youth and family services
- Community mental health programs
- Community based disability support services
- Specialist homelessness and housing programs
- Neighbourhood and community building (Communities for Children Facilitating Partner)
- Victims Assistance and Counselling program
- Gambler's help programs
- Microfinance programs financial counselling
- Training and consultancy
- Publishing, books and resources
- Programs are funded through a combination of state/federal government funding, trusts and foundations, and donations and bequests made by companies and individuals
- St Luke's is governed by a ten-member board. The board brings a range of skills and experience in welfare, law and organisational governance to the service of St Luke's.

St Luke's Values

St Luke's promotes the following values in our work with clients, communities, colleagues, stakeholders and service partners:

- **Respect** is the value that holds each person as having inherent dignity, worth and rights. It acknowledges that they are responsible for their own choices and are their own best expert;
- **Hope** stems from the belief that other possibilities can always emerge, that change is constant and that people have untapped skills and resources;
- **Fairness** is a commitment to the principles of social justice including the rights to access, equity and participation. **Fairness** is the belief that the family and community into which you are born should not determine life's opportunities; the opportunity for a good start in life and a person's options and choices for the future;
- **Quality** is giving the optimum standard of service and support within the limits of our resources. We are committed to learning and to continuous improvement;
- **Community** is our belief that we as humans need connection with each other, need real relationships to grow and share in the belief that the 'village' provides the best environment for support and nurture;
- **Commitment** is demonstrated through passion, compassion and persistence; 'hanging in there' with people through the toughest of times. We are constantly trying new approaches and trying to be the best we can for others;
- and **Openness** speaks to our desire that all conversations with clients, communities, colleagues, stakeholders and service partners are characterised by honest and transparent communication. We actively seek and provide feedback.

Preamble

The issues we raise in our submission and the recommendations we make, are informed by an internal consultation process which engaged with our workforce, many of whom have a strong knowledge of the gambling environment and regulation within Victoria. We asked them what they believe we should recommend to the inquiry. Contributors to the consultation process have all had firsthand contact with people who are problem gamblers, and have witnessed the personal devastation it inflicts on them, their families and the communities we work in. We outline their concerns in this submission because they are the experts on what system changes need to occur to minimise the harm, particularly of EGM's, for problem gamblers.

MEASURES TO PREVENT PROBLEM GAMBLING

Ease of access to assistance for problem gamblers should be assured to minimise harm

We advocate for strengthened local promotion of problem gambling help services to enable people to link directly with providers rather than go through a central support service which can be slow to refer. This should be supported by local advertising to raise awareness of local services, not just central help lines, so that community members know there is expert help available in their local community.

If a national number is used, as is the case with other services, e.g. Inroads Financial Services, the system should direct to the local gambler help provider.

Local providers should be permitted to run local campaigns to raise awareness in their community of both the issues and support available; this is currently restricted in many jurisdictions. It should include the promoting of warning signs that gambling is becoming a problem, and the stories of people who have recovered as an example of hope.

MEASURES WHICH CAN ENCOURAGE RISKY GAMBLING BEHAVIOUR

Inducements and incentives to gamble

We believe children are particularly vulnerable to on-line gambling. Resources should be allocated to educate parents and carers about the danger and prevalence of young people gambling in this way, including ways to block this content on home computers and mobile devices. A strong legislative and regulatory environment about the use of credit cards for online gambling sites and verification, should also apply to prevent children and young people illegally accessing on line gambling websites.

The use of low cost or no cost meeting rooms by pokies venues as a 'community support' mechanism, induces people who would not normally attend venues or who choose not to attend venues, to have to attend. This 'in-kind' support should not be included in the venue's supposed community benefit, eliminating the inducement.

Likewise other inducements such as low cost meals, lure people to venues where they are asked to be members. Misleading promotion of the 'potential' benefits of playing the pokies via membership newsletters, such as "you could travel the world with your winnings" fail to protect vulnerable problem gamblers. This 'membership' material should have to achieve the same standards for advertising as other gambling advertising in the public domain. Members should have to opt in to receive the newsletter rather than opt out to reduce their risk.

Marketing strategies

Advertising, during sporting events particularly, is increasing and 'normalises betting' as a way to participate. Rules which apply to children's viewing time should apply, making the promotion of gambling not permitted.

Including child care and children's play centres where children can be left for long periods of time inside venues, induces parents to gamble by creating environments which support long stretches of gambling. Strict rules about the length of stay in these facilities should be introduced.

Product design

Research about pokie design has uncovered how unsafe EGM's are, particularly for problem gamblers. Overseas initiatives in Scandinavia have seen EGM's redesigned to improve their safety. This includes eliminating 'false' reward signals such as sounds and flashing lights that imply success, when in fact the gambler is losing. Free spins also induce gamblers to keep gambling. The recent cigarette packaging laws have set a precedent which demonstrates that government do have the ability and authority to make products safer for users. Other redesign suggestions include returning to coin only machines to reduce the ease of feeding large amounts of cash into EGM's.

Pre-commitment

Pre-commitment should ensure that there is no facility for gamblers to simply top up their pre commitment amounts. Once the pre-commitment has been made it should apply for 24 hours. Every possible loop hole which negates the intention of pre-commitment should be explored in its design.

Maximum betting limits of \$1 should be introduced to reduce losses.

Currently gamblers on EGM's can lose up to \$1,200 per hour. Losses at this rate cannot be regarded as a form of entertainment, but rather as a 'wealth redistribution' method that exploits vulnerable people. This is an example of how unsafe these machines are, and the potential losses would be greatly reduced by introducing a maximum betting limit.

EARLY INTERVENTION AND TRAINING OF STAFF

Training of venue staff

Staff should be required, compulsorily, to receive training on how to identify and support people attending pokies venues who may be problem gamblers. Currently this is not compulsory. Similar to the responsible service of alcohol training, this training of venue staff should occur within the first fortnight of commencing work in the pokies venue. Previously lip service only has applied to training. Any training content should be determined by an independent body and be based on good evidence about how staff can best support problem gamblers. Good training does build confidence in staff to ask people how they are going, and speak out if they are concerned. Human interaction with people who are in the pokie 'zone' is an important way to have them stop and reassess what they are doing. Combined with a need to use staff operated EFTPOS machines to obtain more money, these strategies interrupt the gambling and allow gamblers to take stock of what they are doing.

Self exclusion

The system used in many NSW venues, which requires people to swipe in with a card that identifies them, increases the rigor of self exclusion approaches. The use of photos of people who have self excluded, or other manual methods to support self exclusion, are notoriously ineffective and rely on staff awareness. Using such a swipe in system demonstrates that clubs and venues take seriously their responsibilities to protect problem gamblers.

Monitoring & compliance of venues

Agencies which have a role in the training and self assessment of venues to ensure their compliance with laws about practices within venues (to support problem gamblers and reduce harm), should be given new levels of authority. Similar to the model used by Victorian WorkSafe, inspectors would support venues to comply with the law through auditing and education, but also be able to issue warnings about practices that either break the law or which are not within the intent of the legislation to protect problem gamblers. Currently these functions are unnecessarily separated, creating duplication and delays in taking action to protect problem gamblers.

METHODS USED TO TREAT PROBLEM GAMBLERS

Counselling training

Counsellors working in gambling support services should receive training specific to supporting people with problem gambling. This is a highly specialised area and equipping the counsellors with these skills is critical to the success of these programs. When delivering this training and any other ongoing support to Gambling Support Workforce, consideration should be given to where they are to deliver the service. Frequently these opportunities are offered in a very metropolitan centric manner, so that workers have to travel great distances to participate, in the process reducing participation. The training and support content should be about building the skills of the counselors, not just sharing information on what the latest research tells us about the damage of EGM's. This is well understood by our counsellors who see and hear about the devastating impact every day.

DATA COLLECTION & EVALUATION

Gamblers Help services, funded by State Governments, are required to provide data about their service delivery and outcomes in addition to other surveys of issues relating to problem gambling. We believe this data should be public so that it can inform public policy and practice. The public availability of the data would in turn demonstrate that governments are making evidence based decisions.

Currently the data collected through support services does not capture all of the dimensions of the issues around problem gambling, and appears to be predominantly quantitative , not allowing a stronger narrative about problem gambling to be uncovered and documented.

GAMBLING POLICY AND RESEARCH

It is undoubted that local communities in Victoria who do not want more EGM's in their towns and suburbs are currently burdened by a system which requires them to prove the harm of introducing more pokies. The burden falls to opponents rather than resource rich venue operators. This creates a huge burden for resource strapped local governments, with cases to object frequently exceeding \$200,000 in costs. A decision taken in Bendigo in 2011 by the local council was to not object to a pro-pokies decision because of the predicted excessive financial cost to the council, despite a supportive local policy environment and strong community objection. In the last year Whittlesea Council spent in excess of \$600,000 to fight the introduction of EGM's in a new property development. We regard this as a waste of valuable community resources. Consequently we recommend that the real cost to communities of opposing additional pokies be researched and quantified to inform a system which currently creates an unfair burden.

St Luke's Anglicare feels that EGM's have now become a highly politicised issue with governments reluctant to cut off a funding stream which contributes significantly to their finances. Consequently research which shows the real costs to business, communities, families and problem gamblers directly needs to be modelled. Communities when surveyed consistently say they do not want machines and yet they are approved. Perhaps if research was able to quantify the real costs to our communities, this would not seem like such an attractive funding stream for governments.

CONCLUSION

St Luke's Anglicare feels strongly that in addition to minimising the harm of existing pokies machines, and increasing support for problem gamblers, the Federal Government should pursue a policy of capping the number of EGM's, so that not a single additional machine is installed in local communities around Australia. The data and research now very strongly shows that EGM's are a dangerous and damaging product. Prohibiting the installation of more machines would show respect for communities who consistently say they do not want any more and will also acknowledge the great potential harm to individuals, families and our society from pokies.

***Submission compiled by the Social Policy and Advocacy Department of St Luke's Anglicare.
Any questions on content should be directed to Leah Galvin via email***