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### **Submission in relation to the 2011 Codes of Practice Review**

We note that the IGA is now conducting a review of advertising codes of practice and responsible gambling codes of practice applying in South Australia. We also note that the review includes a participant pre-registration process and what, in our view, are very short timelines given the complexity of both the codes as well as the actual issues at stake.

As the peak body for the community services sector in South Australia, SACOSS's members provide key services to support problem gamblers and their families. The experience gained from these frontline services, plus the policy and research expertise of peak bodies should provide a valuable input for government in considering gambling regulation.

The sector recognises the importance of the codes of practice under review and has concerns particularly about the regulation of gambling advertising. However, SACOSS is unable to put a submission or any information to the review at this stage. This should not be interpreted as a lack of concern from the sector about the issues, nor an endorsement of the current guidelines and practices.

SACOSS receives no funding from the IGA or from government for gambling advocacy. We have on many occasions over the last year made representations to government alerting them to the fact that we do not have the resources to keep relevant members informed of IGA and government processes and to aggregate and articulate the sector's position on gambling regulation. We believe this creates a serious imbalance in public policy. In other industries where there is a similar asymmetry of power and resources between industry and consumers (eg. utilities), funds are made available to underpin consumer advocacy so as to ensure the interests of vulnerable consumers are recognised and represented. This is not the case in relation to gambling, despite many key reforms currently under consideration.

We are aware that some organisations in our sector will put in submissions to the review and we welcome their work in providing this information and input. However, we remain concerned that the voices of many organisations in our sector, particularly smaller service providers and consumer groups, will not be heard in this review (and in relation to gambling regulation more generally) because of lack of resourcing.

SACOSS remains open to talking about options for resourcing gambling consumer advocacy, but until those resources are secured it is difficult to provide peak body input from the sector into your inquiries.

Yours,

A handwritten signature in black ink, appearing to read 'Ross Womersley', with a stylized flourish at the end.

Ross Womersley  
Executive Director, SACOSS  
21 September 2011