



## **Response to call for comment by the Independent Gambling Authority on changes to the *Gaming Machines Act 1992***

This submission responds to the invitation from the Independent Gambling Authority on changes to the *Gaming Machines Act 1992*. This response takes a perspective that is founded on Anglicare-SA's Gambling Help Services (GHS) extensive practice in working with individuals and families who experience problem gambling and is in line with the organisation's vision and values.

### **Organisational Background**

Anglicare-SA has been working for the community of South Australia for over 150 years and is recognised as an organisation providing high quality services responding to both immediate need and assisting people to maintain and restore dignity and control in their lives. We are a large and diverse human service organisation with extensive experience in the delivery of a broad range of community based services including family support, aged care, housing and the provision of comprehensive support to individuals and families in crisis. Many of our clients have high and complex needs.

Through our extensive experience in the delivery of assistance to people who are experiencing problem gambling, Anglicare-SA has built a reputation as an organisation that can form positive, trusting relationships with people with varying levels of need and behaviours. We believe such relationships are at the core of successful intervention. As South Australia's most diverse provider of community and health services to individuals, families and communities, we recognise the significance of problem gambling on quality of life and demand for community services. Alongside assistance with problem gambling behaviours and associated problems, Anglicare-SA understands that access to a range of supports during life transitions is critical for healthy relationships and social functioning.

The provision of rehabilitation and support services for people affected by problem gambling in the South Australian community is undertaken by a group of stakeholders, of which Anglicare has been part since the inception of our GHS (formerly BreakEven Services) more than a decade ago. This has allowed Anglicare to develop knowledge of key issues impacting on problem gamblers, relationships with service providers, advocate on behalf of people experiencing problems with gambling and contribute to the ongoing development of policies that underpin the government's response to problem gambling.

Over the past decade we have established and maintained strong working relationships with other GHS providers including industry and community groups. This has been evidenced through our active engagement with the gambling industry support services including Club Safe (Clubs SA), Gaming Care (AHA SA) Host Responsibility (Adelaide Casino) gambling venues, other gambling help services, including the Statewide Gambling Therapy Service, and Special Purpose Groups.

Relationships with the hotel and club industry have resulted in GHS counsellors being involved in the delivery of workshops and information sessions about the nature and characteristics of problem gambling along with AHA Early Intervention Agency staff. This has been very successful and we have seen a resultant increase in client referrals from the industry.

Anglicare has many examples of GHS counsellors working with venues and clients to support voluntary barring processes. This occurs most often when venue staff perceives a patron maybe spending significant amounts of time, or money, at the gaming venue and believes that their gambling is out of control or causing harm to themselves or to a significant other. With support from a GHS staff member and gaming/hotel manager we have often worked together to encourage the client to consider barring/self exclusion as an option, short or long term. Collaborative practices during this process ensure clients are safe, respected and confidentiality is maintained at all times.

Anglicare's GHS counsellors work closely with the Independent Gambling Authority (IGA) on issues of self exclusion and more generally in respect to the provision of the Problem Gambling Family Protection Orders Scheme. Clients are supported to access services offered by the IGA through the provision of verbal, written and electronic information and the explanation of consequences and responsibilities for individuals and families when considering undertaking these processes in relation to problem gambling issues.

This extensive background in the provision of rehabilitation services and community education, together with our established relationships with the gambling industry places Anglicare-SA in a strong and informed position to comment on the policy initiatives outlined in the Draft Amendments Consultation Paper.

### **Key Principles in Legislating for Gaming Machines**

Anglicare-SA regrets, but acknowledges the fact that gaming machines are legal and now an established activity in our community.

Within this context, we believe that a commitment to harm minimisation is the most appropriate response to the problems of gambling. We define harm minimisation as "a process of education, intervention, regulation and treatment which reduce risks and negative impacts on individuals, their associates and communities".

As a fundamental precondition of effective harm minimisation, Anglicare-SA considers that any reform to legislation on gaming machines should address the impact of gambling facilities on vulnerable and disadvantaged communities. This includes, but is not limited to, reducing the number of gaming machines and venues across South Australia. Problem gambling is not a simple issues and an inability to address multiple risk factors limits the impact and sustainability of intervention.

Anglicare-SA's GHS comments on changes to the *Gaming Machines Act 1992*, in particular section 15(5) and granting of gaming machine licenses, will focus on the following:

- Application Contents for Gaming Machine Licenses
- Strengthening the Social Effect Test for New Venues
- Determination Process of Gaming Machine Licenses
- Social Effect Certificates

### ***Application Contents for Gaming Machine Licenses***

Anglicare-SA's GHS agree with the preliminary requirements of the application contents as stated in the Gaming machine licensing guidelines (2 November 2005). We believe consultation with relevant local government councils and gambling rehabilitation providers is essential to attaining a holistic understanding of the likely social effects of operating electronic gaming machines (EGM). Such effects are inclusive of crime, loss of productivity and employment, mental and physical health, relationship breakdown, distress of family and friends, and violence.

### ***Strengthening the Social Effect Test for New Venues***

Anglicare-SA GHS supports the requirement of a social effect certificate for new venues. However, it is important that a social effect test is undertaken as a compulsory pre-condition of the issuing of a social effects certificate. As with the Victorian Commission for Gambling Regulation legislation, which states they "...must not grant an application...unless satisfied that...the net economic and social impact of the approval will not be detrimental to the well-being of the community of the municipal district in which premises are located". We believe that similar measures will increase operator's awareness and understanding of the wider social and economic implications of operating gaming venues. It may also help to protect vulnerable communities from the negative impacts of problem gambling, particularly harms associated with EGMs as outlined by the Productivity Commission (PC) whereby the "...likelihood of harm rises steeply and continuously with the frequency of EGM gambling and expenditure levels".

For the social effect test to be of value, it must be rigorous and extensive in its canvassing of social impacts on a community as a whole, together with specific population cohorts within communities. Furthermore, measurements of social impacts and tests applied to gaming license applications are subject to high degree of subjectivity. As a result, we support the active engagement of GHS providers and other interest groups in the determination of a revised set of principles and terms of reference for such assessments. We also support the notion of obtaining feedback from community stakeholders during the application process by way of a public hearing, as is the case in Victoria.

Anglicare-SA GHS would also like to see the strengthening of social effect test extended to all venues that elect to expand their gaming operations. An increase in the number of EGMs can have a significant effect on the venue's patrons and the community on which it operates. Reinforcing this notion are findings from the 'Gambling Prevalence in South Australia' study (2006) which identified EGMs as the most popular gambling activity among moderate and high-risk gamblers, at just over 90%. Additionally the Productivity Commission identified South Australia as having inverse relationships between income and gaming machine spending i.e. those with lower incomes have higher gambling expenditure, and vice versa. Consequently, the benefits of the amendment would be increased by the inclusion of all expanding venues to a social effect test as a pre-condition to being granted additional licenses.

### ***Determination Process of Gaming Machine Licenses***

Anglicare-SA GHS regard the determination process of gaming machine licenses as sound and inclusive in its reasoning. Extending the invitation to participate to relevant local government councils and GHS reinforces positive relationships between interest groups, thereby advancing their ability to assess and address community needs in relation to gambling.

### ***Social Effect Certificates***

Anglicare-SA GHS believe the proposed changes will support industry in managing risk associated with making an application for a gaming machine license. It will also encourage consideration of the social effect of the product within the community in which the new or established business will operate. Recording details of social effect certificate ensures transparency, and will enable stakeholders to be aware of proposed changes within a community.

## **Summary**

Anglicare-SA Gambling Help Services have been working with South Australians for over 15 years. Our response to this Inquiry is based on our experiences with the social impacts that are an inherent result of problem gambling, particularly since the introduction of electronic gaming machines in this State. As such, we support the pursuit of measures that will minimise the risk gambling machines pose on vulnerable people and communities.

Anglicare-SA has welcomed the opportunity provided by the Independent Gambling Authority to comment on the changes to the *Gaming Machines Act 1992*. We view these instances of community consultation as important indicators of responsible Government.

Our comments have been made in line with Anglicare-SA's policy on gambling machines and their regulation, such that legislation surrounding machines and their management should

serve to minimise the harm suffered by individuals, families and their communities as a result of problem gambling. We support many of the proposed amendments to the Gaming machines Act 1992 and have made suggestions of ways in which further amendments could make the achievement of the amendment goals more secure.

Anglicare-SA believes it is imperative to encourage measures aimed at reducing the total number of licenses, provided that it does not lead to a concentration of gaming machines in 'high risk' demographic communities. We support the requirement of a social effect certificate for new venues and a stronger social effects test, as it assists in the identification of changes in distribution of gaming machines in South Australia - particularly those effecting vulnerable communities. Furthermore, inclusion of input from a spectrum of stakeholders in the form of a public hearing demonstrates a holistic approach to minimising negative social impacts associated with gambling.

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