

# Social Effect Inquiry 2011

**To: Independent Gambling Authority**

**From: UnitingCare Wesley Adelaide and Heads of Christian Churches Gambling Taskforce**

## **Submitter profile**

This is a joint submission from UnitingCare Wesley Adelaide (UCW Adelaide) and Heads of Christian Churches Gambling Taskforce (GTF).

UnitingCare Wesley Adelaide is a large non government community service organisation providing over 50 different services across South Australia. As Adelaide Central Mission, the organisation developed the first gambling help services in South Australia, and continues to see people with gambling problems through financial counselling, relationship counselling, mental health, alcohol and drug rehabilitation and Lifeline Telephone counselling services.

The South Australian Heads of Christian Churches Gambling Taskforce was established in 1999 as a result of direct concern of Christian churches about the adverse social impacts of poker machine gambling on South Australian families and their communities. It remains the only standing committee of the South Australian Heads of Christian Churches.

## **Social Effect Inquiry**

This brief summary submission deals with four aspects relevant to this “inquiry in relation to changes to the *Gaming Machines Act 1992* in relation to the processes of applying for and granting gaming machine licences, to address the social effect of the proposed licence;” specifically:

1. issues to be addressed by applicants seeking a Social Effect Certificate for a “greenfield's site”
2. issues to be addressed by applicants seeking a Social Effect Certificate for a transfer of the electronic gaming machine entitlements
3. guidelines for assessing applications for a Social Effect Certificate.
4. Aspects of the nature of Social Effect Certificates

Issues to be addressed by applicants seeking a Social Effect Certificate for a “greenfield's site”

The submitting agencies support the retention of current requirements namely:

(a) a demographic and social profile of the locality of the proposed licensed premises; Noting that the locality should be matched to existing statistical sources—so as to enable analysis and comparison on a statistical local area, or local government area, basis.

(b) the business plan for the proposed gaming business, accompanied by an explanation of how the demographic and social profile of the anticipated patron group relates to the profile of the locality;

(c) an explanation of the proposed premises design, including any features designed to assist in monitoring for problem gambling behaviour and for barred persons;

(d) details of the consultations with local government and gambling rehabilitation providers, including their suggestions and feedback, and how those matters have been taken into account in the application, an assessment of the level of engagement and impact the venue will have on gambling support services

(e) enforceable undertakings proposed by the applicant to be included as conditions of the licence when granted, relating to venue-based responsible gambling measures to be undertaken by the applicant.

We also proposed that submitting agencies provide:

(f) a statement explaining the applicant's understanding of problem gambling behaviors and potential impacts on problem gambling by the proposed venue; including,

- outlining how the venue will prevent underage people from becoming involved in gambling;
- how the venue will identify and deal with patrons with likely mental health issues
- information and advice strategies for dealing with people for whom English is not their first language
- other at risk groups identified in the social and demographic profile

(g) approaches for 'in venue' identification of likely problem gambling behaviours (refer research undertaken by Dr Paul del Fabbro and published by GRA.

(h) the nature and operation of an effective pre-commitment program for the venue applying for a social affect certificate

(h) proximity of the proposed venue to schools, youth centres, childcare centres and other community facilities that are likely to attract relatively high volumes of passing traffic by people who may be at greater risk from gambling, including children and young people.

The submitting agencies encourage the Office of the Commissioner of Liquor and Gambling to advise an appropriate community service organisations of applications for social effect certificates, to help facilitate genuine community engagement in a meaningful assessment of applications. We propose that the agency receiving notification be SACOSS, the South Australian Council of Social Service. We note that that there is currently no funding provided to any community service organisation to be involved with gambling policy, regulation or licensing input from a community well-being perspective. We therefore consider it reasonable that the licensing Authority provide a community organisation with such information that will save scarce resources from being wasted on search costs.

#### Issues to be addressed by applicants seeking a Social Effect Certificate for a transfer of the electronic gaming machine entitlements

The submitting agencies suggest that the requirements outlined above also be applied to any venue seeking to transfer more than nine gaming machine entitlements to a new venue or to increase the number of poker machines in an existing venue.

In addition, such applicants should also provide summary information about the demographic and social profile of the location from which EGM's are being transferred, to enable consideration of impacts of the proposed transfer on EGM concentrations and to ensure that EGM's are not being transferred to a more socially or economically disadvantaged area.

#### Guidelines for assessing applications for a Social Effect Certificate

Social effect certificates should not be issued where there is a transfer of entitlements:

- to locations with higher social or economic disadvantage, as measured by the SEIFA indexes published by the ABS
- to locations with a higher EGM (to population) concentration
- to locations where police or community service organisations identify significantly higher numbers of people with specific 'at risk' characteristics, e.g. mental health.
- Compliance with Australian Consumer Law, (as applied from 1/7/2010)

A public hearing should be required as part of consideration of all applications for greenfield sites and any transfer for more than nine EGM entitlements. This hearing should be held as close as practical to the location to where it is propose that entitlements will be transferred, and should be advertised widely in that location.

## Aspects of the nature of “social effect certificates”

Social Effect Certificates must:

- Be non transferable,
- Be non tradeable
- Of limited Life, eg 5 years, at which time a renewal process will need to be undertaken .
- List enforceable undertakings
- List actions that would lead to revocation of the certificate

Further information

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