

30 October 2020

Liquor & Gaming NSW
GPO Box 7060
Sydney NSW 2001

Sent via email: gaming.policy@liquorandgaming.nsw.gov.au

Dear Liquor & Gaming NSW

Submission to Gaming Machines Amendment (Gambling Harm Minimisation) Bill 2020

We write to provide comment to the *Gaming Machines Amendment (Gambling Harm Minimisation) Bill 2020* draft released for consultation.

Suicide Prevention Australia is the national peak body for suicide prevention, counting among our members Australia's largest and many of the smallest suicide prevention and mental health organisations.

We welcome the opportunity to submit to consultation on the draft bill and commend NSW Government for recognising the need for legislative reform in problem gambling to enhance protections of the health and wellbeing of Australians who gamble.

The 2015 HILDA Survey found that people experiencing gambling-related problems accounted for almost half (42% or \$3.63b) of total expenditure, with losses higher on electronic gaming machines than other forms of gambling.² We know that problem gambling is linked to severe financial distress,¹ which can often lead to unemployment and relationship breakdown – all of which are key risk factors for suicide.

We heard powerful stories of lived experience at a recent policy roundtable we held on problem gambling and suicide in partnership with Financial Counselling Australia on the 20 October 2020. One participant shared how his family only found out about his sibling's severe problem gambling from a financial counsellor after they had died by suicide, and another participant described losing time with his children as the greatest loss he could never recover.

Key risk factors for suicide such as financial distress and relationship breakdown are amplified by the harms associated with problem gambling. Problem gambling has been found to impact the functioning of family and intimate relationships, result in significant emotional impact on children that can carry into adulthood, is associated with family violence, and can often culminate in family breakdown.^{2,1,3}

¹ Rintoul, A. & Deblaquiere, J. (2019). Gambling in Suburban Australia: Study report, *Australian Government, Australian Institute of Family Studies, Australian Gambling Research Centre*, available at: https://aifs.gov.au/agrc/sites/default/files/publication-documents/1902_gambling_in_suburban_australia.pdf.

² Australian Gambling Research Centre. (2014). The impact of gambling problems on families, *Australian Government, Australian Institute of Family Studies, AGRC Discussion Paper No. 1*, available at: <https://aifs.gov.au/agrc/publications/impact-gambling-problems-families/what-are-impacts-gambling-problems-families>.



Protective factors for suicide such as social support and connectedness in stable relationships, physical health, and employment³ are compromised by the financial harms associated with problem gambling (e.g. bankruptcy, inability to afford life essentials such as food, either losing or selling off assets to cover gambling debts or continue gambling, and job loss)⁴ leaving people vulnerable to risk factors of suicide. Of the population in Australia who are homeless, research indicates that between 15-20% are homeless due to a gambling addiction.⁴

We believe a public health approach is required to address problem gambling, as the onus cannot fall entirely on the person with a gambling addiction. We welcome the harm minimisation approach adopted in the draft bill, and the proposals which will enhance social responsibility on venues to intervene when problem gambling behaviour presents.

While we commend the proposals to address poor venue culture and encourage greater social responsibility to their patrons who use their gaming machines, we believe the draft bill should go further in reducing potential harms to the lives of Australians.

The policy roundtable we held on problem gambling and suicide aimed to identify the key issues in gambling and suicide, and workshop pathways for reform. The roundtable was attended by 49 representatives from the gambling industry, government, banks, financial counsellors, therapeutic gambling counsellors, policy makers, coroner's courts, the suicide prevention sector, and people with lived experience.

Our brief submission will highlight recommendations from our policy roundtable along with relevant evidence for your consideration.

Summary of recommendations:

- NSW Government to legislate use of player activity cards to play gaming machines in venues.
- Include financial gambling counsellors in referral information and promotional material on display in rooms with gaming machines.
- Strengthen privacy regulations for people who gamble to prohibit companies from sharing or selling client contact data among the industry.
- Require gambling company operators to conduct financial risk assessments.
- NSW Government to deliver a community education awareness campaign on the signs of problem gambling.

Player activity cards

³ Life in Mind. (2020). Risk and protective factors for suicide, *Everymind*, available at: <https://lifeinmind.org.au/about-suicide/suicide-across-the-lifespan/risk-and-protective-factors>.

⁴ Browne, M., Rockloff, M., Hing, N., Russell, A., Murray Boyle, C. & Rawat, V. (2019). NSW Gambling Survey 2019, *NSW Government, NSW Responsible Gambling Fund*, available at: https://www.responsiblegambling.nsw.gov.au/_data/assets/pdf_file/0007/280537/NSW-Gambling-Survey-2019-report-FINAL-AMENDED-Mar-2020.pdf.

Of an estimated 6.8 million regular gamblers in Australia in 2015, 21% used electronic gaming machines.⁵ Of 6.8 million estimated regular gamblers, 1.39 million Australian adults experienced harms associated with problem gambling behaviour.⁵ Higher proportions of people who experienced problem behaviours with gambling were found to have participated in electronic gaming machines.⁵

Our roundtable heard from a number of people with lived experience of problem gambling and suicide. One man who had experienced relationship and family breakdowns and financial distress from problem gambling reported:

I would like to see changes and clear signposts put up in terms of the amount of time people gamble, different amounts they gamble and clear simple things that could be done - not to prevent people from having fun, but for people like me who can't help themselves.

We welcome the recent announcement, separate to this consultation, on the draft bill that Minister Dominello is seeking to implement cashless, card-based gaming machines in NSW. We support this initiative which will minimise harm for the many Australians experiencing problem gambling, and recommend this initiative be legislated to ensure accountability across venues in NSW.

Participants at our roundtable are in support of this announcement, having identified the need for gaming machines to be accessible via player activity cards. Player activity cards would allow people to pre-select limits on the length of time they gamble and the amount they want to spend. The cards would also provide activity statements to help people track how much time and money they have spent and can be linked to exclusion schemes.

Player activity cards can help to minimise harm that can be caused by underestimating the amount of time and money spent gambling, and difficulties in making rational decisions on increasing wagers, continuing to play, or maintaining control.⁶

Recommendation: NSW Government to legislate use of player activity cards to play gaming machines in venues.

Referrals to support services

We welcome the proposal to have a person on duty to act as a qualified Gambling Conduct Officer to identify and intervene in incidents where problem gambling behaviour presents and provide referral to support and counselling services and the opportunity to self-exclude.

Participants at our roundtable identified that commonly referrals provided to people experiencing problem gambling are typically therapeutic gambling counsellors. It is important that the referrals provided include both therapeutic gambling counsellors and financial gambling counsellors. Financial gambling counsellors work with people who are experiencing debt or are unable to meet their ongoing expenses.

Recommendation: Include financial gambling counsellors in referral information and promotional material on display in rooms with gaming machines.

⁵ Armstrong, A. & Carroll, M. (2017). Gambling activity in Australia: Findings from wave 15 of the Household, Income and Labour Dynamics in Australia (HILDA) Survey, *Australian Government, Australian Institute of Family Studies, Australian Gambling Research Centre*, available at: <https://aifs.gov.au/agrc/publications/gambling-activity-australia>.

⁶ Parke, J., Rigby, J. & Parke, A. (2008). Cashless and card-based technologies in gambling: A review of the literature, *Gambling Commission, University of Salford Manchester*, available at: <http://usir.salford.ac.uk/id/eprint/18206/>.

Stronger regulation of the gambling industry

Our roundtable identified the need for greater regulation of the gambling industry across jurisdictions in Australia. In particular, the need for restrictions on gambling companies use of personal information to target gamblers by offering incentives to gamble.

Financial Counselling Australia's report into the impact of uncontrolled sports betting identified betting companies share client data among each other.⁷ For example, when a client ceases gambling with one company, the company trades client lists with another company who then offers targeted incentives or enticements to the person so they begin gambling again with a new company.⁴

One participant at our roundtable was asked whether he would ever recover from his experiences with problem gambling, he responded:

There is no regulation it's as if they've opened up a highway and said gamble as much as you want and no one stops me. My first bet might be \$100 and my next one might be \$30,000 and no one says that should be an issue.

I seek a lot of help every day, it's very difficult when I still get calls from VIP managers asking if I would like to open an account. It's beyond me that I still get that.

While the issue of data sharing and incentives plays out more in online forms of gambling, it still impacts the effectiveness of exclusion schemes and harm minimisation efforts more broadly as problem gamblers are being incentivised to resume their problematic behaviours, which can extend to resuming other forms of gambling e.g. electronic gaming machines.

Gambling companies are further not required to conduct financial risk assessments on clients prior to opening an account with the company. One participant at our roundtable shared how he would take out multiple credit cards and gamble 100% of the credit on each card, resulting in insurmountable debt.

Relying on corporate social responsibility in circumstances where financial incentive exists for operators to not intervene is ineffective and unconscionable. Without stronger industry regulation, harm minimisation strategies are weakened in their ability to reduce harm among people who are either current problem gamblers or are at risk of becoming a problem gambler.

Recommendations:

- **Strengthen privacy regulations for people who gamble to prohibit companies from sharing or selling client contact data among the industry.**
- **Require gambling company operators to conduct financial risk assessments.**

Education & community awareness

For every problem gambler, it is estimated that anywhere from 7 to 17 other people are adversely affected.⁸ Participants at our roundtable identified the need for a community education awareness

⁷ Financial Counselling Australia. (2015). A report: Duds, Mugs and the A-list – The impact of uncontrolled sports betting, *Financial Counselling Australia*, available at:

<https://www.financialcounsellingaustralia.org.au/docs/duds-mugs-and-the-a-list-the-impact-of-uncontrolled-sportsbetting/>.

⁸ The South Australian Centre for Economic Studies. (2010). Occasional Paper No. 33 Problem gamblers and the role of the financial sector, *Australian Government, Department of Families, Housing, Community Services*

campaign on being aware of the signs of problem gambling and where to go for support. We recommend NSW Government develop a campaign with two streams of messaging:

- For the individual on the signs on how to recognise if your gambling behaviour is problematic or causing harm.
- For families, friends, and carers on how to identify the signs of problem gambling in a loved one and where to go for support.

Family and friends of people who gamble need to know how to identify when a loved one may be experiencing problem gambling, as often problem gambling is hidden. The campaign should be co-designed with people with a lived experience and their carers.

The Office of Responsible Gambling has demonstrated their ability to deliver awareness campaigns that resulted in positive behaviour change. For example, the evaluation of the *You're Stronger Than You Think* campaign targeting men to overcome shame and stigma to seek help throughout 2014-2016 found 22% of problem gamblers had sought help for their gambling.⁹

A campaign on how to identify the signs of problem gambling aligns with a harm reduction framework and complements the introduction of stronger regulations to enhance social responsibility on venues to intervene when problem gambling behaviour presents.

Recommendation: NSW Government to deliver a community education campaign to awareness of the signs of problem gambling.

Once again, we welcome the amendments introduced by NSW Government to reduce harm and enhance protections of the health and wellbeing of people who gamble. For further information please contact Rebecca Burdick Davies, Director – Policy, Advocacy and Government Relations on 0401 619 280 or email rebeccabd@suicidepreventionaust.org or Caitlin Bambridge, Policy Advisor on email caitlinb@suicidepreventionaust.org.

Yours sincerely



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and *Indigenous Affairs*, available at:

https://www.dss.gov.au/sites/default/files/documents/05_2012/op33.pdf.

⁹ Office of Responsible Gambling. (2020). Awareness campaigns, *NSW Government*, available at: <https://www.responsiblegambling.nsw.gov.au/education-and-awareness/awareness-campaigns>.