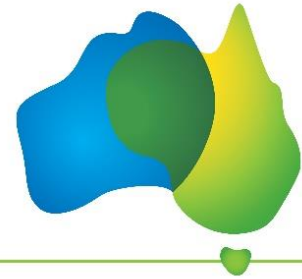


**November 2022**



**Suicide Prevention  
Australia**

# **Inquiry into online gambling and its impacts on those experiencing gambling harm**

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**Submission**

**For general enquiries:**

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Imagine a world without suicide

## Introduction

Suicide Prevention Australia is the national peak body for the suicide prevention sector. We have over 350 members representing more than 140,000 employees, workers and volunteers across Australia. We provide a collective voice for service providers, practitioners, researchers, local collaboratives and people with lived experience.

Over 3,000 people tragically die by suicide and an estimated 65,000 people attempt suicide each year. Over 7.5 million Australians have been close to someone who has taken or attempt suicide. Our shared vision is a world without suicide and with our members, we work to inform through data and evidence; influence systemic changes that drive down suicide rates and build capability and capacity for suicide prevention.

Suicide is complex, multifactorial human behaviour with many varied risk factors. Increasingly, the evidence is clear that the social determinants of health and wellbeing, including social, economic and physical environments, play a critical role in suicide rates.

We know that gambling harms are often hidden and can heighten two key risk factors for suicide which are financial hardship and relationship breakdown. We also know that protective factors for suicide, such as social support, physical health and employment can be compromised by gambling harm.

NSW data suggests of those who seek help for gambling harm, as many as 11% attempt suicide.<sup>1</sup> Victorian research found almost one in five people presenting with suicidality also experience harms with their gambling. More broadly, we know gambling-related suicides are under-reported and not getting the policy attention they deserve.

In early 2022, Suicide Prevention Australia and Financial Counselling Australia released a joint paper [Gambling and Suicide Prevention: A roadmap for change](#), that outlines key opportunities for action. These range from increased efforts to identify and record gambling-related suicides to steps that banks, gambling providers and regulators can take to reduce gambling harm. Together with Financial Counselling Australia, we brought together a range of experts across sectors and people with lived experience to collaborate and unify against a common goal: to reduce the harms of gambling and save lives to inform the development of our report.

While Australia has not reported increases in suicide rates during the COVID-19 pandemic, other measures of distress, self-harm and suicide attempts demonstrate ongoing suicide risks in the community. As we emerge from the pandemic and compounding natural disasters, research shows suicide rates can peak 2-3 years after a crisis. At the same time, there's been major increasing in online gambling, with an over 300% increase in two years.

According to the Australian Institute of Health and Welfare (AIHW), legal gambling losses are an estimated \$22 billion every year, making Australia the country with the highest rate of gambling losses per person in the world.<sup>2</sup> The 2015 HILDA Survey found that of the 6.8 million regular gamblers (39% of Australian adults) who lost an estimated \$8.6 billion, people experiencing gambling harm accounted for almost half (42% or \$3.63 billion) of the total expenditure that year.<sup>3</sup>

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Key risk factors for suicide, such as financial distress and unemployment, were found to be over-represented in the sociodemographic characteristics among people who experience harm with their gambling (ie. people had low incomes, were unemployed, and lived in low socioeconomic areas).<sup>4</sup>

Research has found almost one in five people presenting with suicidality also experience harm with their gambling.<sup>5</sup> Protective factors, such as social and financial supports, are compromised by the financial harms of gambling and this leaves people vulnerable to risk factors of suicide.<sup>6,7</sup>

We welcome the opportunity to submit to this Inquiry and will address the Terms of Reference using findings from our report and existing evidence.

## Summary of Recommendations

1. Commonwealth Government should establish a coherent, adequately funded, national regulatory structure for gambling.
2. Commonwealth Government to lead a national gambling harm minimization strategy with liaison with the National Suicide Prevention Office.
3. Commonwealth Government to introduce regulations to intervene early when gambling harm patterns emerge among gamblers to reduce harm and prevent suicide. These regulations should extend further to gaming apps which require in-game payments.
4. Commonwealth Government to increase their own regulatory powers to regulate the online gambling industry.
5. Ensure all helpline operators are trained to have conversations about gambling and know how to refer callers to specialist gambling assistance services. Banks, gambling companies and other organisations to have protocols for correct referral of customers with gambling issues who are at risk of suicide.
6. Strategy to increase awareness of bank and gambling industry consumer tools to protect those at risk of gambling harm, to promote self-exclusion and pathways for accessing help. The strategy should reduce the stigma associated with gambling harm and normalise help seeking.
7. Awareness and education campaigns on the signs of harmful gambling for adults and youth.
8. Increased investment in treatment and support initiatives is required. This includes funding for integrated treatment facilities for people experiencing harm with their gambling at-risk of suicide and development of a peer-based care model so that those with lived experience of gambling-related suicidality have support from those who have first-hand experience.
9. Screening tools for gambling harm implemented in regular assessments for mental health and/or drug and alcohol issues by healthcare professionals.
10. Gambling industry to work with the Office of the Australian Information Commissioner (OIA) to develop guidelines for communications between stakeholders to support individuals at risk.
11. Regulate VIP marketing and inducements to gamble.
12. Ban gambling advertising

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## Stronger gambling regulations

Gambling warrants a public health approach where responsibility is shared by individuals, community groups, gambling companies, banks and governments at all levels. The industry needs more consumer-focused gambling regulations, especially to curb emerging online forms of gambling.

Gambling regulation is failing to provide adequate consumer protection and the myriad of state and federal regulators involved in gambling regulation operate in silos. We welcome this review and recommend the establishment of a coherent, Commonwealth-led, adequately funded, national regulatory structure.

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.

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*“The bank gave an aged pensioner \$120,00 in credit card debt. He should not have been given so much credit. He attempted suicide.”*  
Financial counsellor

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Financial Counselling Australia’s report into the impact of uncontrolled sports betting identified betting companies share client data among each other.<sup>8</sup> 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 such as credit to the client to draw them back into gambling with a new company.<sup>9</sup>

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.

People at-risk or experiencing harms resulting from gambling can often underestimate the amount of time and money spent gambling, and difficulties in making rational decisions on increasing wagers, continuing to play, or maintaining control.<sup>10</sup>

Our Lived Experience Panel highlighted issues that present in gaming applications that require in-game payments that can have similar harmful impacts as online gambling. For example, some gaming apps require payment to advance further in games, to secure ‘mystery reward deals’ to advance the game progression, and are often designed free to play for the first few levels but then require payment to continue playing once engaged in the game. Concerningly, gaming apps can be targeted towards younger audiences and feature similar methods of engagement to play that pokies do (e.g., flashing lights, money sounds, and require payment with no guarantee of reward). Our Lived Experience Panel reported the potential for family members to prioritise income spending on gaming apps instead of basic life necessities such as food or clothes.

Spain’s Directorate for Gambling Regulation is currently developing new online gambling regulations. If passed through legislative processes, regulations will include:<sup>11</sup>

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- Requirement of players to set time and net spend limits for every session of play before commencing gambling
- Players to receive at least one message every 30 minutes during play with information on their playing behaviour including amount wagered or net loss
- Ban on harmful messages throughout play e.g. 'you were close' that encourage gambling continuation
- Monthly summaries available to players including amount of times they visited the site, spending patterns, changes in limits set
- Maximum limits implemented on daily or weekly loss
- Differentiated message prompts to players who bet higher/more frequently and are considered 'intense players'
- 'Intense players' will be prohibited from using credit cards to gamble online

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*"I recently had four out of six clients in a day admitting that they were considering suicide.  
Lawyer, Gambling legal service*

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Sweden implemented a Statutory Duty of Care and Harm Minimisation Strategy in 2018 which requires gambling companies to:<sup>12</sup>

- Ensure social and health considerations are observed in gambling activities to protect players from harmful gambling
- Report in action plans how duty of care is to be fulfilled
- Design or program of online gambling games are prohibited from giving players the impression of being 'close to winning'
- Bans on free spins, trial games, and similar games that have a different random outcome than the corresponding staked game
- Limits must be set on online games which are specified by day, week, and month
- Players to be given an option to set limit on play time in online gambling
- In cases where a player raises a limit more than SEK 10,000 per month, operators must contact the player to fulfill duty of care obligations
- Operators are prohibited from offering or providing credit for in-game wagers
- Self-assessment tests for gambling harm must be available in visible location on gambling websites

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*"We need strong interventions to protect consumers of the online gambling industry and we need it urgently. Because if we don't act the only sure bet is that people will continue to be maimed, harmed and die and that's on all of us.  
Russell Northe, Member for Morwell, Victoria*

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- Players are able to suspend themselves from gambling with a 'suspension until further notice' unable to be lifted for 12 months
- Operators are required to check with the self-exclusion register every time a new player is registering a new account and every time a player logs in to their system
- Gambling licence holders must continually monitor gambling patterns among players, make individual risk assessments, implement effective responsible gambling measures, and follow up on the effectiveness of responsible gambling measures

Commonwealth Government should introduce regulations to intervene early when harmful gambling patterns emerge among gamblers to reduce harm and prevent suicide. These regulations should extend further to gaming apps which require in-game payments. We further suggest strategies can include:

- Gambling operators be required to conduct financial risk assessments on clients prior to opening an account.
- Establish a plan for banks to reduce gambling harm, including banning of debt-funded gambling (such as credit cards), introduce friction and consumer awareness points when large amounts of money are being moved to gambling accounts, provide safe accounts for managing savings and lump sums, and spend control tools. Banks and others to promote the banks' gambling blocks and other forms of help.
- Ban data sharing of dormant client lists among gambling companies that are used to incite people to return to gambling.
- Gambling industry to work with the Office of the Australian Information Commissioner (OIAC) to develop guidelines for communications between stakeholders to support individuals at risk.

### Recommendations

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1. Commonwealth Government should establish a coherent, adequately funded, national regulatory structure for gambling.

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2. Commonwealth Government to lead a national gambling harm minimization strategy with liaison with the National Suicide Prevention Office.

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3. Commonwealth Government to introduce regulations to intervene early when gambling harm patterns emerge among gamblers to reduce harm and prevent suicide. These regulations should extend further to gaming apps which require in-game payments.

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4. Commonwealth Government to increase their own regulatory powers to regulate the online gambling industry.

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## Keeping communities safe from the harms of gambling

The community needs greater education and awareness of the signs of harmful gambling for individuals, families, and frontline workers. Stigma prevents help seeking.

Over January 2000 to December 2012 the Victorian Coroners Prevention Unit reported 128 gambling-related suicides, 126 of which were found to have experienced harm with their gambling and 2 had been impacted by a partner's harmful gambling.<sup>13</sup> For every person experiencing gambling harms, it is estimated that anywhere from 7 to 17 other people are adversely affected.<sup>14</sup>

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*The Victorian Coroners Prevention Unit reported 128 gambling-related suicides, 126 of which were found to have experienced harm with their gambling*

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Research undertaken in the United Kingdom (UK) found prevalence of suicidality among people experiencing harm from gambling to be significantly higher than gamblers who are potentially at-risk or no risk, with results indicating 1 in 5 people experiencing harm from gambling had experienced suicidal thoughts (19.2%), and 1 in 20 had made an attempt on their life in the previous 12 months (4.7%).<sup>15</sup>

Australian research into gambling during the COVID-19 pandemic found almost 1 in 3 participants signed up for a new online betting account, and 1 in 20 started gambling online.<sup>16</sup> Among those who already gambled 4 or more times a week, rates of gambling increased from 23% to 32% during the pandemic.<sup>17</sup> Young men were found to be most likely to open new online gambling accounts and to be at risk of the harms of gambling.<sup>18</sup>

A study into gambling among young people (aged 12-17 years) in NSW found on average, young people start simulated gambling and monetary gambling around 11-12 years.<sup>19</sup> Among this age group, 29.8% had participated in monetary gambling and 40.1% had played games with gambling components.

A study into the perception from individuals and broader public into the stigma associated with harmful gambling found over 80% of participants used secrecy to deal with the stigma of harmful gambling.<sup>20</sup> Shame and fear of disclosing the degree of gambling behaviour occurring were found to pose barriers to help-seeking behaviours among participants, for example not participating in self-exclusion schemes for fear of being labelled as a 'problem gambler'.<sup>21</sup>

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*How do I know that gambling-related suicides are happening? I have wanted to kill myself from lived experiences and tried. I have heard many stories of people who have tried. I know of a few where the noted reason for the death was different, but the cause of it was really from gambling*  
*Person with lived experience*

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Participants at our roundtable highlighted the need for greater education, specifically a campaign on being aware of the signs of the harmful gambling, what the key trigger points may be (e.g. redundancy, compensation pay outs, car accidents, relationship breakdown), and where to go for support. It was suggested that a campaign consist of two streams of messaging:

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- For the individual on the signs on how to recognise if your gambling behaviour is problematic or causing harm, and where to go for support.
- For families, friends, and carers on how to identify the signs of harmful 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 the harms of gambling, as often harmful gambling is hidden. The education campaign should be co-designed with people with a lived experience and their carers and platform the voices of lived experience, and include a toolkit of resources readily available online.

Healthcare professionals are frontline witnesses to the harms of gambling on individuals and families and are well positioned to both identify and intervene early. The Victorian Responsible Gambling Foundation found moderate risk and people experiencing harms from gambling attend visits with GPs on average 7-8 times per year, and 41.86% of people experiencing harms of gambling had been diagnosed with depression.<sup>22</sup> In a study of prevalence of gambling harms in patients attending community mental health services, high rates of substance use among moderate-risk and people experiencing harms from gambling was found.<sup>23</sup>

The Productivity Commission 2010 inquiry into gambling further recommended governments to provide a one-item screening tool for harmful gambling to be used when conducting mental health assessments, specifically when people present with 'anxiety, depression, high drug and alcohol use'.<sup>24</sup>

Telephone helplines play a critical role in crisis intervention, suicide prevention, and connecting individuals and families with healthcare services. For some people, telephone helplines can be a first point of contact with the mental health system. In an evaluation of the Australian Gamblers Helpline where the most common reason for calling was because gambling was impacting their life, 67% made an appointment within a month of the received referral.<sup>25</sup> The one month later follow up further found improvements in self-control, finances, and lower levels of anxiety among callers.<sup>26</sup>

## Recommendations

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5. Ensure all helpline operators are trained to have conversations about gambling and know how to refer callers to specialist gambling assistance services. Banks, gambling companies and other organisations to have protocols for correct referral of customers with gambling issues who are at risk of suicide.

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6. Strategy to increase awareness of bank and gambling industry consumer tools to protect those at risk of gambling harm, to promote self-exclusion and pathways for accessing help. The strategy should reduce the stigma associated with gambling harm and normalise help seeking.

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7. Awareness and education campaigns on the signs of harmful gambling for adults and youth.

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8. Increased investment in treatment and support initiatives is required. This includes funding for integrated treatment facilities for people experiencing the harms of gambling at-risk of suicide and development of a peer-based care model so that those with lived experience of gambling-related suicidality have support from those who have first-hand experience.

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9. Screening tools for harmful gambling implemented in regular assessments for mental health and/or drug and alcohol issues by healthcare professionals.

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10. Gambling industry to work with the Office of the Australian Information Commissioner (OIAC) to develop guidelines for communications between stakeholders to support individuals at risk.

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## Prohibit gambling advertisement

Of key concern among participants at our policy roundtable is the normalisation of gambling in Australian society due to gambling advertisements. This concern was mirrored by almost half of participants in the Australian Gambling Research Centre study into gambling behaviour during the COVID-19 pandemic who stated the change they most want to see is a reduction in 'gambling promotion and advertisements – especially related to sports betting advertising'.<sup>27</sup>

A study commissioned by the Victorian Responsible Gambling Foundation on young men and their gambling behaviours found on average participants had 4 separate accounts with online betting companies, and that gambling uptake was driven by promotions from betting companies.<sup>28</sup>

Inducements to gamble and unsolicited credit offered by gambling companies that incentivise people to gamble pose harm to people unable to control their gambling habits in a safe manner. Stronger consumer protections are required to minimise harm to gamblers and ensure that those who self-exclude are not then drawn back into gambling by another company.

Spain banned gambling advertising on radio, television, and video exchange platforms except from 1am to 5am in 2021.<sup>29</sup> Legislation requires age restrictions are required to be used to minimise harm to young people and bans of use of promotional bonuses unless to registered and verified customers.<sup>30</sup>

Advertising is pervasive and targeted towards those most at-risk of experiencing the harms of gambling and often those most at-risk of suicide. As with tobacco advertising, it should be banned nationally.

### Recommendations

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11. Ban VIP marketing and inducements to gamble.

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12. Ban gambling advertising.

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**There are crisis services available 24/7 if you or someone you know is in distress**

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**Lifeline: 13 11 14**      **Standby Support After Suicide: 1300 727 247**  
[www.lifeline.org.au](http://www.lifeline.org.au)    [www.standbysupport.com.au](http://www.standbysupport.com.au)

**Suicide Call Back Service:** \_\_\_\_\_  
**1300 659 467**      [www.suicidecallbackservice.org.au](http://www.suicidecallbackservice.org.au)

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## Acknowledgements Statement

Suicide Prevention Australia acknowledges the unique and important understanding provided by people with lived and living experience. This knowledge and insight is critical in all aspects of suicide prevention policy, practice and research. Advice from individuals with lived experience helped guide the analysis and recommendations outlined in this policy position.

Our Lived Experience Panel provided advice on the harms of gaming apps that can cause similar harms to online gaming through in-app purchasing, the risk gaming apps pose to young people, and the need to include regulating gaming apps in similar ways to online gambling which is reflected in our recommendation to extend introduction of harm minimization strategies for online gambling to include gaming apps.

As the national peak body for suicide prevention, our members are central to all that we do. Advice from our members, including the largest and many of the smallest organisations working in suicide prevention, as well as practitioners, researchers and community leaders is key to the development of our policy positions. Suicide Prevention Australia thanks all involved in the development of this policy position.

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