



**ALLIANCE FOR
GAMBLING REFORM**

Alliance for Gambling Reform
**Inquiry into online gambling and its impact
on those experiencing gambling harm**

November - 2022

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NB. Language disclaimer: A widely used, standard definition of disordered gambling is that “Problem Gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community”. We avoid the use of the term “problem gambler” and “problem gambling” as it is stigmatising and victim-blaming. We recognise the Problem Gambling Severity Index is widely used in research and clinical settings, but consider that even those gamblers characterised using that system as being at low or medium risk, can in fact experience significant harm. You can read more about language in our language guide [here](#).

■ Background Information

The Alliance for Gambling Reform (The Alliance)

The Alliance for Gambling Reform is a collaboration of organisations with a shared concern about the harmful aspects of gambling and its normalisation in Australian culture. We are a registered health promotion charity.

The Alliance supports public policy and regulatory regimes that make Australia a safer, healthier, and more equitable society by reducing the level of gambling harm. We prioritise policies and actively campaign for change that prevent gambling harm and minimises its consequences.

Our policies are developed by drawing on the lived experience of people who have been harmed by gambling, in addition to our understanding of public health policy evidence and research. We believe lived experience is critical to developing informed understanding of problems and possible solutions.

Defining gambling harm

The Alliance takes a public health approach to gambling harm. In this submission, we use the term 'harm' to describe any negative consequence that results from a person's own or another's gambling. These commonly accepted harms include:

- Financial problems
- Relationship conflict or breakdown
- Health problems
- Emotional or psychological distress
- Reduced capacity in other parts of your life
- Cultural harms
- Criminal activity

Gambling harm extends beyond addiction, often impacting many people, not just the person who is gambling. Family members, friends, employers and the broader community can also be harmed by someone else's gambling. As a community, we have recognised the harms to others that tobacco represents, and have policies that aim to prevent passive smoking.

We need to build protections for those who are harmed by an activity they cannot directly control.

Recommendations

1. Reduce exposure to online gambling harm in Australia

- 1.1. Restrict online exposure to gambling for children and young people
- 1.2. Ban the broadcasting of all gambling advertisements
- 1.3. Restrict all forms of online promotion, advertising and inducements and increase enforcement actions against companies breaching these restrictions
- 1.4. Regulate technologies in gaming such as loot boxes which have the potential to increase gambling harm

2. Establish national regulation to address online gambling harm

- 2.1. Establish an independent, adequately funded national gambling regulator and online gambling ombudsman.
- 2.2. Establish a national action plan addressing gambling related harm through a public health approach recognising that, like other harmful products such as tobacco and alcohol, gambling requires regulation and reform that prevents and reduces harm.
- 2.3. Establish a national gambling forum of State and Territory and Federal Ministers responsible for gambling regulation.

3. Reduce unintended losses online

- 3.1. Implement a mandatory pre-commitment scheme for online gambling services with binding and practical default limits which can only be increased with proof of income.
4. Increase public awareness of gambling and its harms
 - 4.1. Implement a national multi-platform gambling harm campaign to inform different segments of the community and provide access to resources and guidance for those seeking help for gambling related harm.
 - 4.2. Change language from 'responsible gambling' and 'problem gambler' to 'harm prevention' and 'gambling harm' in regulations, policies and across agencies.
 - 4.3. Encourage financial institutions to promote harm minimisation options and develop advice and referral options for people at risk of gambling harm.

5. Provide increased education and training on gambling harm

- 5.1. All staff involved in gambling related online activity should be independently trained and accredited in awareness and support for people experiencing gambling harm.
- 5.2. Independent training for staff who work in helplines who may be contacted by someone experiencing gambling harm alongside common co-morbidities including suicide, mental health problems or family violence.
- 5.3. Develop and implement a nationally consistent, evidence based, education curriculum for schools about gambling and its potential harms.

6. Improve treatment for people experiencing gambling harm

- 6.1. Provide ongoing regular evaluation and recommendations to improve the services available to people seeking help for gambling issues.
- 6.2. Provide all medical and health professionals (including helpline operators) with an up to date set of guidelines and referral options.
- 6.3. Provide an independent gambling harm national services directory.

7. Increase research and support for best practice approaches to gambling harm

- 7.1. Increase national investment in independent research with the ability to access unidentified customer data to be able to investigate the impacts of harm and possible solutions including drawing on emerging technology.
- 7.2. Establish independent, regular evaluations and reviews of:
 - a) Education programs for schools and the gambling industry workforce
 - b) Support services in person, online and over the phone
 - c) Gambling harm minimisation tools such as limit setting and self-exclusion technology

■ Setting the context - gambling in Australia

Gambling harm is a public health issue, one that is growing rapidly and impacting millions. In Australia, we have Ministers for the promotion of gambling, but no Ministers for gambling harm reduction. Gambling is an industry that has expertly created a system which is not only very profitable for companies, but also directly makes significant contributions to governments.

Australians of all ages are saturated by gambling images and promotions; at pharmacies, veteran services, news agencies, sporting grounds, on television, on social media, to name a few. In Australia, (unlike most countries) gambling is normalised and celebrated which has led to the highest levels of gambling losses per capita in the world (Letts, 2018).

With such high losses comes the need for extensive support services for both those who experience gambling harm from their own or someone else's gambling. However, for those in need of help, the support services available are opaque and possibly inadequate.

There is a lack of accountability and transparency both at government level and within the industry itself. The gambling industry has been able to capture state interests and dictate terms of regulation. One only needs to look at the New South Wales bi-partisan support of an MOU with Clubs NSW for an example of state capture.

The gambling industry is incredibly predatory of those who experience the most harm, the 'loyal' customers, people who spend beyond their means and continue gambling regardless of their financial situation. This is why reducing harm usually means reducing profits.

On a national level, the National Consumer Protection Framework has achieved crucial reforms including activity statements, improved messaging on gambling advertisements and BetStop, the national self-exclusion scheme. But these measures do not address the fundamental drivers of gambling harm and so much more needs to be done.

There is limited independent evidence and research funding in this area and evidence-based policy is elusive. It is clear that online gambling has evolved so rapidly that research, and governments, have not been able to adapt, address or prevent the exponential growth in gambling harm. The lack of regulatory measures to prevent these developments is harming not only adults, but more frequently children. Urgent action is needed to safeguard Australians from emerging technological developments in the gambling area.

In a country with by far the highest per capita gambling losses in the world, the systems preventing gambling harm need to be completely overhauled.

■ The key issues in reducing online gambling harm

The Alliance believes action is needed in seven key areas to reduce the growing level of harm associated with online gambling in Australia.

1. Exposure to online gambling harm in Australia

Advertisements

Australians lose the most to gambling per capita, at around double the average of other Western Countries (Armstrong & Carol, 2017). Gambling products are advertised across the country in a saturation manner. An example of this is in Victoria on free to air television 948 gambling ads on average were shown every day in 2021 (VRGF, 2022). Gambling is also promoted at pharmacies, newsagencies, on billboards, stadiums, sports jerseys, radio, social media, print media to name a few. It is so deeply entrenched and under regulated that the gambling industry has found ways to advertise so that we are constantly confronted with options to gamble online.

Online gambling companies are some of the top-spending advertisers in Australia, in 2021 with advertising on gambling being around \$281 million (AdNews, 2022).

The restrictions placed on advertising in Australia (there are unique laws in South Australia with gambling ads banned during live broadcasts of sport before 8.30pm) are minimal and do not stop children and vulnerable people being exposed multiple times a day with gambling advertisements and inducements to gamble.

The impact this is having on children is significant and highly concerning. In a study by Pitt et al, 91% of children between the ages of 8-16 could recall seeing a promotion for sports gambling (2016). Further, the celebrity endorsements lessened the perceived risks of gambling for young people as they trusted the person supporting the product (David et al., 2019). It has been found that around 40% of young people under the age of 16 had engaged in formal or informal gambling (Pitt, 2017). Young people experiencing harm now and into the future is a major children's rights issue that must immediately be addressed.

In 2019, a Victorian study found that 31% of secondary school students had gambled at some point in their lives and six per cent had gambled in the previous 30 days (Freund et

al., 2017). Hing et al (2020) found that, on average, young people aged 11 to 12 years old started simulated gambling and monetary gambling at much the same age.

In 2016, one in four children could name four gambling brands or more (Thomas et al., 2016). In the same year in Victoria alone, there were an average of 374 ads each day on free-to-air television, now there are 948 daily, so the exposure to children could be much greater (VRGF, 2022).

There are consistently new opportunities for the gambling industry to be advertising to Australians. A recent example of this is TikTok granted an Australian bookmaker 'closed pilot' access to advertise on the platform. (A number of these ads have been shared with the Alliance by concerned people¹.) Under normal circumstances, it goes against TikTok's guidelines to promote gambling services. Even when people ask TikTok not to show these ads, and report the content, they continue to advertise.

The increase in influential people promoting gambling

It is not uncommon for influential people, celebrities and sports stars, to be paid to support, be sponsored by, or advertise gambling. However, with the rise of influencer culture and social media, it's crucial the rules around who can promote gambling, when and where needs to be reviewed and addressed. In the UK, gambling ads featuring sports and reality TV stars are banned. In Australia, no such restrictions apply.

Recently, Australian of the Year, athlete and disability advocate Dylan Alcott showed his support for PointsBet while Shaquille O'Neal visited Australia on a brand deal. Alcott is an influential role model and a strong driver of change for those living with a disability - a group disproportionately impacted by gambling harm. Despite not knowing the motivations for Alcott to be affiliated with PointsBet, it provides an example of how people, even the Australian of the Year, promote gambling to their followers under the guise that this activity is 'normal' and 'fun'.

¹ <https://vt.tiktok.com/ZSRnRCyeg/>, <https://vt.tiktok.com/ZSRGuQjDc/>,
<https://vt.tiktok.com/ZSRXHhwwp/>, <https://vt.tiktok.com/ZSRnRcSwF/>,
<https://vt.tiktok.com/ZSRnNGffs/>

Gambling advertising and social media

Gambling advertisements on social media are largely unregulated and highly confusing to the general public. When there is a breach of the law, it is unclear who the correct statutory body is to make a complaint to. In some instances, our supporters have told us that state-based regulators have not been able to investigate issues with social media gambling advertising as it is the responsibility of the commercial platform.

A research report published in 2021 by the University of Bristol highlighted how children and people under the age of 24 are vulnerable to the growing popularity of gambling advertisements on social media. The report found that while the vast majority of adults are annoyed or wary when faced with gambling ads on social media, children mainly reacted positively.

The University of Bristol report made recommendations which the Alliance supports, and despite being an international study, the global nature of social media means these recommendations are relevant in Australia. The recommendations are:

- Esports gambling advertising should be banned
- Gambling content marketing to be rigorously regulated and informed by what is proven to attract young people
- Social media platforms to only allow gambling ads on social media when users actively opt-in to receive them

Inducements

Inducements are a form of marketing used to attract new customers or encourage further gambling (such as multi-bets, bonus bets, rewards programs, early cash-outs and direct messages) and are linked to increased betting expenditure and encouraging riskier betting (Hing et al., 2018). The full impacts of inducements on gambling harm are not yet fully understood, however, they are found to increase engagement.

Each jurisdiction in Australia has different laws around inducements, some taking a stronger harm minimisation stance than others. NSW, for example, has prohibited the advertisement of any offer of an inducement to participate in any gambling, including an inducement to gamble more frequently. South Australia also has a similar law. It is crucial all jurisdictions have consistent legislation and ban inducements.

The convergence of gambling and gaming

There are a range of gambling-like features which have become embedded into gaming, most of which have no age restrictions. This has blurred the line between gaming and gambling. Gambling-like activities often found in games include social casino games, loot boxes, virtual casinos in video game modules and Esports (Duffy, 2017). Thirty four per cent of Australian young people made in-game purchases in 2017 (King, 2018).

Loot boxes in particular are of concern due to their monetary element. Loot boxes are virtual containers that can be opened to reveal random game-related features and can be functional or cosmetic and vary in value. Loot boxes can be earned with skilful play, however it is common for people to purchase loot boxes. Duffy (2017) highlights that 'in the sense that loot boxes involve staking money on an outcome determined by chance, they are very similar to gambling.'

It appears that EGM manufacturers such as Aristocrat are also grooming young people through apps that do not have age restrictions that have very similar visuals and sounds to a poker machine. Simulated gambling is thought to normalise gambling and make it seem like a safe and legitimate activity for young people (King, 2018).

Recommendations

1. Reduce exposure to online gambling harm in Australia

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- 1.4. Regulate technologies in gaming such as loot boxes which have the potential to increase gambling harm

2. National regulation to address online gambling harm

There have been many calls for a restructure of gambling regulation in Australia. In the past year alone we have seen casino reviews in most jurisdictions, evidence of money laundering in pubs and clubs and increased advertising, promotions and inducements from online bookmakers. All reflect a failing regulatory system.

Currently, each state government assigns a different Department the responsibility for gambling regulation. These Departments include, but are not limited to, the Department of Treasury and Finance (South Australia), Department of Justice and Community Safety (Victoria), Department of Customer Service, Liquor and Gaming (NSW), Department of Industry, Tourism and Trade (NT).

Gambling harm is a public health issue and the Department in which gambling is regulated, monitored and reviewed needs to be one with a health focus, not an industry focus. We have Ministers for gambling. We need Ministers for gambling harm prevention.

Ideally the different processes, legislation, departments and regulatory systems in each state need to be replaced with a single, independent, sufficiently resourced national regulator with gambling harm minimisation at the core of its purpose.

Recommendations

2. Establish national regulation to address online gambling harm

- 2.1. Establish an independent, adequately funded national gambling regulator and online gambling ombudsman.
- 2.2. Establish a national action plan addressing gambling related harm through a public health approach recognising that, like other harmful products such as tobacco and alcohol, gambling requires regulation and reform that prevents and reduces harm.
- 2.3. Establish a national gambling forum of State and Territory and Federal Ministers responsible for gambling regulation.

3. Reducing unintended losses online

Under the current systems, responsibility for preventing gambling harm is placed in the hands of the gambling industry who have a clear conflict of interest when it comes to increasing their profits.

In areas such as online gambling, it can be extremely difficult to know when someone moves from not experiencing harm to experiencing harm from gambling. The gambling industry has developed its own 'safer gambling' tools to avoid scrutiny and impactful legislative changes which will decrease profits. An example is Responsible Wagering Australia's opt-in chance for customers to set deposit limits.

Any self-regulated industry-led harm prevention measures are of concern due to their conflict of interest. For those measures to be successful, they should be independent, evidence informed and included in legislation.

Online gambling, in particular, has unique risks that need to be addressed in order to prevent harm. It is changing the way people engage with gambling due to the high level of accessibility and ease with which money can be spent (Gainsbury, 2015). The nature of gambling on a smart phone makes it much more private, easy to hide, and also possible to bet with multiple bookmakers at once.

Recommendations

3. Reduce unintended losses online

- 3.1. Implement a mandatory pre-commitment scheme for online gambling services with binding and practical default limits which can only be increased with proof of income.

4. Public awareness of gambling and its harms

To achieve public awareness of gambling and its harms, we need to abolish the industry coined 'responsible gambling' ideology and move to a public health approach (Livingstone & Rintoul, 2020). This blaming the victim narrative has served the gambling industry well, just as it previously served the alcohol and tobacco industries well until they were treated as a serious public health issue. There are currently no areas of any health department in Australia specifically focussed on gambling harm.

Although the conversation about gambling is shifting in some areas like sports advertising, there is still a long way to go when it comes to breaking down stigma and shame for anyone experiencing harm from gambling. Research suggests that as few as ten percent of people seek help for high levels of gambling related harms when required (Miller, 2014).

From a very young age gambling in Australia is normalised through constant exposure to the various products available at all hours of the day. Thomas and Lewis highlight that there has been a 'cultural construction of gambling' in Australia in which people view gambling as a fundamental part of the Australia culture (2011). We are also told by both industry and governments that only 'a few' people are negatively impacted by gambling. All these factors create a very difficult environment for individuals to seek help when being harmed by gambling, and it is why we need to de-normalise gambling and de-stigmatise seeking help.

The Gambling and Suicide Prevention report: A roadmap for change by Financial Counselling Australia (2022), found that financial institutions have an ability to reduce gambling harm by banning debt-funded gambling such as with credit, introduce friction and consumer awareness points when large amounts of money are being moved to gambling accounts, and providing safe accounts for managing savings and lump sums and spending control tools. These options need to be more fully explored and developed.

Recommendations

4. Increase public awareness of gambling and its harms

- 4.1. Implement a national multi-platform gambling harm campaign to inform different segments of the community and provide access to resources and guidance for those seeking help for gambling related harm.
- 4.2. Change language from 'responsible gambling' and 'problem gambler' to 'harm prevention' and 'gambling harm' in regulations, policies and across agencies
- 4.3. Encourage financial institutions to promote harm minimisation options and develop advice and referral options for people at risk of gambling harm.

5. Education and training on gambling harm

There are a number of areas to consider when discussing education and training, so we have included themed headings for this section.

1. Education around the harms and risks associated with gambling
 - a) *Children, parents and families:* There is an inconsistent approach to educating children and young people about gambling which is very concerning. Some jurisdictions in Australia have different school education programs, and in some states it is not required. Many of these education programs appear not to be evaluated and reviewed.
 - b) *General Australian public:* The money allocated to educating communities about gambling harm via advertisements is minimal especially when compared to the advertising budgets of online bookmakers like SportsBet, PointsBet and others. Most existing education campaigns are funded by governments (usually funded by gambling taxes) and the evaluation of the effectiveness of these campaigns are not made public. However, there are clear issues with some of these campaigns, such as the Victorian Responsible Gambling Foundation funded [Doug the Mug](#), which normalises gambling online and shames those who experience harm, or [Betiquette](#), which has sexist undertones and reinforces the personal responsibility narrative. Both of these campaigns highlight a need for a review of how the general public are informed about the harms of online gambling.
2. Training staff who work for the online gambling industry:
 - a) Training for staff about gambling associated harms for those who work in the online gambling industry is extremely poor. It is industry run, funded and regulated, and there are no publicly available records of compliance or rates of training for staff who work for online wagering companies. In Victoria, there is no legislative requirement for Victorian bookmaker staff to complete 'Responsible Service of Gambling Training,' and although one (of many) responsible gambling code requires staff to complete training, there is no approval of course content required. Bookmakers who are licensed in the Northern Territory (many of the large companies are due to the lower tax requirements) are required to complete 'appropriate responsible gambling' training, however, there is no evidence this training is effective nor that it is actually being completed. Often these kinds of requirements are not monitored by regulators. Again, each jurisdiction is different and it is clear there needs to be a national standard for training requirements, the frequency of training, the monitoring and evaluation of training, and disciplinary action taken against a bookmaker if this training is not happening. Ideally these actions would be publicly transparent, encouraging greater accountability.

3. Training health service providers about gambling related harms and its impacts:
 - a) Many health professionals on the front line who may be required to support someone experiencing gambling harm are not given gambling specific training. As a highly harmful and stigmatised issue, with the narrative around individual responsibility led by the gambling industry, it is possible that many of these staff have biases about someone experiencing gambling harm if they have not been provided with training on the complex nature of gambling harm. This includes GPs, psychologists, psychiatrists and people who work at mental health support organisations like Lifeline and Beyond Blue.

It is clear that education and training around gambling harm and its impacts on individuals, families and our communities is insufficient. There is an obvious need for a national approach to education and training related to online gambling harms.

Recommendations

5. Provide increased education and training on gambling harm

- 5.1. All staff involved in gambling related online activity should be independently trained and accredited in awareness and support for people experiencing gambling harm
- 5.2. Independent training for staff who work in helplines who may be contacted by someone experiencing gambling harm alongside common co-morbidities including suicide, mental health problems or family violence.
- 5.3. Develop and implement a nationally consistent, evidence based, education curriculum for schools about gambling and its potential harms.

6. Treatment

For someone who is experiencing gambling harm, either due to their own gambling or someone else's gambling there are a number of services available. This includes the nationwide 24/7 gambling help online service run by Turning Point Addiction research and education centre, and a helpline which is also run by Turning Point and in person, free and confidential gambling support services run across Australia.

Each jurisdiction also has different services for people seeking treatment for gambling harm. In the Northern Territory, Australian Capital Territory and South Australia, the major contractor is Relationships Australia, in Tasmania it is Anglicare, in Western Australia it is CentreCare, in Victoria it is the Victorian Responsible Gambling Service (who have contracts with local community organisations to run the service), the Queensland and New South Wales model are similar to that of Victoria's.

People may also flag they are in need of support due to gambling related harms through GPs, mental health professionals, community health workers and in some cases allied health professionals.

Worryingly, there is little or no evaluation into the effectiveness of most Gamblers Help Services. It is therefore not possible to demonstrate the effectiveness of these services and especially given that many are supported either directly or indirectly by gambling companies, which again raises concerns given the incentives for companies to generate profit.

Treatment for people experiencing gambling harm needs to be integrated into the broader health system especially given the potential for comorbidities. It also should be properly evaluated including providing a lived experience perspective on how accessible and effective the current treatment options are for different groups of gamblers, their families, workplaces and communities.

Recommendations

6. Improve treatment for people experiencing gambling harm

- 6.1. Provide ongoing regular evaluation and recommendations to improve the services available to people seeking help for gambling issues.
- 6.2. Provide all medical and health professionals (including helpline operators) with an up to date set of guidelines and referral options.
- 6.3. Provide an independent gambling harm national services directory

7. Research

The need for independent, sufficiently funded research to underpin regulation and reduced harm is essential in Australia. There are many facets of gambling harm that require further explanation including the social and health costs of gambling harm: the extent to which children are gambling and methods; comorbidities of gambling harm; at-risk groups; and the effectiveness of all tools used to support people at risk of gambling harm.

The Alliance is sceptical of industry-led gambling harm minimisation tools and urges them to be thoroughly evaluated by independent sources. This rarely happens. A recent example of the need for meaningful independent evaluation has arisen from the Victorian Auditor-General's Office report 'Reducing the Harm Caused by Gambling' in March 2021 which highlighted the need for the VRGF to focus evaluations on outcomes rather than outputs for their programs aimed at reducing harm.

A useful study conducted in the UK in 2021 using anonymised bank data over seven years found that gambling harm rates are far higher than previous prevalence studies have indicated (Muggleton et al., 2021). This is the kind of independent and informative study the Alliance would like to see conducted in Australia, especially as per capita we are losing much more to gambling than in the UK.

The reality is that across Australia we have very limited evaluation and reviews into all aspects of preventing and treating gambling harm. We do not adequately test our gambling harm reduction policies and practices; we do not evaluate education programs in schools or Gamblers Help treatment services. Australia needs a much higher level of investment into independent research and evaluation to ensure our prevention, harm minimisation and treatment programs are effective.

Recommendations

7. Increase research and support for best practice approaches to gambling harm

- 7.1. Increase national investment in independent research with the ability to access unidentified customer data to be able to investigate the impacts of harm and possible solutions including drawing on emerging technology.
- 7.2. Establish independent, regular evaluations and reviews of:
 - d) Education programs for schools and the gambling industry workforce
 - e) Support services in person, online and over the phone
 - f) Gambling harm minimisation tools such as limit setting and self-exclusion technology

■ Conclusion

It is difficult to overstate the level of harm associated with online gambling in Australia. And yet, we are constantly told it is only a handful of 'problem gamblers' governments and communities should be worried about.

Apparently, the gambling industry is good for us – generating government revenue and sponsorship dollars for sport and other activities. Anyone seeking to counter the prevailing view that gambling is relatively harmless and integral part of Australian cultural life must be a wowser, a do-gooder, an overzealous moralist, or a socialist seeking to impose government led limitations on fun, enjoyment and fair market profits.

The facts tell a very different story. Australia is blind to its addiction to gambling despite the hard reality that Australians lose much more per capita in gambling than any other country in the world. Gambling harm ripples out from individuals, to families, workplaces, communities, our justice system, our safety, our health, productivity and wellbeing.

For too long governments and community leaders have been happy to turn a blind eye to gambling harm, buying the gambling industry line that gambling only impacts a small minority of people who should be more responsible for their own actions.

What we know for certain is that the lack of effective regulation of gambling promotions, inducements, advertising and sponsorships has enabled Australian culture to be undermined by an industry generating profits largely through encouraging harmful gambling and supporting activities including money laundering and criminal associations.

The biggest expansion of gambling in recent times has been in the online space. Most people in Australia, including most of our teenagers and older children, now have mobile phones that enable them to gamble privately, without supervision, without limits, without oversight of any kind. Encouraging this activity has become an industry in itself. Hundreds of millions of dollars are being spent each year on promotions and advertising, targeting young men in particular but with an increasingly successful focus on young women, inculcating them into the gambling world through lucrative partnerships with the most popular sports in Australia. And that is just the above the line advertising.

State and Territories seem powerless to impose any meaningful restrictions. The Federal government has yet to enact any gambling policies that limit harm. And so, Australians continue to think their abnormal obsession with gambling is just part of Australian life.

This submission has clearly laid out the issues associated with online gambling and called for targeted sensible policies that can reduce the level of harm in Australia. Whether governments like it or not, individuals, families, workplaces and communities are being harmed by gambling. This area is crying out for effective action from Australian governments. Anything less represents a complete failure of political leadership.

■ Stories of harm

I have been exposed to some form of betting all my life in one way or another however the betting probably became more prevalent from the mid 1990s onwards. Looking back it probably became a serious problem from 2006 onwards but was not a serious financial issue until I lost my main source of income in November 2012.

The constant advertising of betting agencies and easy access to credit cards saw me accumulate a large debt which I did not have the ability to repay and ended up with me stealing money from my employer to feed my addiction. It was not until I was sentenced to three years in jail that the reality hit me. I have lost a reputation which took me 40 years to build, lost my home of 20 years, lost my 23 year marriage and am currently classified as secondary homeless.

From my experience I feel there are two main ways of reducing the impact that gambling is having on society.

First we need to get the banks to put a block on transfer of funds from credit cards to betting agencies. This includes using credit cards at poker machine venues.

Secondly I feel we need to get government approval to speak to 15 and 16 year olds at school and warn them of the dangers of becoming addicted to gambling and the consequences they face if they go down that path.

Yes we can talk to people who are already struggling with the disease but I feel it is more important to help not get started in the first place. I have applied for my working with children card to be renewed and if successful would be only too pleased to be involved with educating the teenagers of today.

Thanks for considering my experience today and I hope I can help in some way in the future.

Mark from Victoria

I'm 34 years old and I have suffered from a sports gambling addiction for 15 years. Since quitting gambling in 2017, I have shared my story to raise awareness around gambling harm. Whilst this was never easy and involved a huge amount of bravery and vulnerability, I did this because I believe it needed to be done.

My gambling addiction crept up on me and it was a slow and gradual demise. I believe this can happen to anybody. Not only did gambling impact me financially but it also impacted me in many other ways. Relationships with partners, family, friends all suffered. My working career suffered because I often gambled whilst I was at work.

Gambling became my safety blanket, so any troubles in my life were ignored and gambling at the time seemed to solve those issues but of course they were only making them worse. And most importantly gambling made me become a truly horrible version of myself. Through recovery I have learnt so much about myself, what are my strengths, weaknesses, best traits. When I gambled I was selfish, grumpy, shut off, unhappy. I didn't know who I was as a person. Gambling halted both my personal growth and my career growth without even realising.

I tried to stop gambling multiple times. Sometimes I would go weeks, even months. There were several times when I was trying to stop where gambling companies would email or sms enticing me to bonus bets if I deposited again with them. I also remember having a dedicated VIP manager who would often contact me with bonus bet deals and offers if I deposited a certain amount with them that weekend. At the time I wasn't aware however now I look back and can see how wrong this is. This is still going on today. It makes me feel sick thinking about it.

The amount of gambling related adverts in Australia is not only worrying but sickening. Whilst the ads will not entice me to ever gamble again they do normalise gambling and provide a constant reminder of gambling. The frequency needs to be reduced and there needs to be restrictions on when ads can be aired. Exposing families with young kids to gambling during the 6 o'clock news or The Bachelor is wrong. There needs to be further education to children around the harm that gambling can cause. We have a lot of work to do. Gambling is ingrained in Australian culture and there needs to be work done to ensure that our younger generations aren't falling into the same trap that I and many others do.

Jacob NSW

My gambling addiction began in the 70's with horse, dog and trot racing, my outlet was either the track or the TAB. As the addiction became more intense it was harder for me to conceal from my loved ones, friends and family. It is well known that a gambling addiction is the most secretive and hidden addiction, I did it very well through lies and stealth.

Online gambling when introduced was a godsend for me, I could freely punt on races by the telephone at first and then through the computer and telephone as online gambling became more sophisticated. Far less lies were told, far less time sneaking off to a TAB. The further introduction of a myriad of sports to wager on was a further incentive for me to increase my wagering to dangerous and extremely excessive levels as is the want of addiction.

I could wake at 3am in the morning and bet on a basketball game being played in Spain or Lichtenstein, the access to gambling was seemingly unlimited, fuelling my addiction, causing myself and my family great harm with each day spiralling deeper into the abyss. My addiction along with its illogical and irrational thought processes eventually saw me justify behaviours that were illegal and wrong, as right and legitimate. The consequence of course led me to a term of imprisonment, my rock bottom.

Online gambling now includes poker machines, card games and sports of all sorts just to name a few. accessible at all times of the day or night, simple applications where the transfer of funds into an account can be done with ridiculous ease. A person may have as many accounts as they like with providers (I had 7 accounts).

Online companies who run these platforms have very little regulation and there are many documented issues with people unable to be paid winnings and other fraudulent activity.

Online wagering needs to be reigned in with clear operating hours that does not allow for 24 hour operation and stricter regulation and enforcement of predatory behaviour and must include bet limits. One person, one account, and one provider provisions must also be introduced.

The ridiculous amount of gambling ads directed toward young people and the vulnerable is a disgrace. The overwhelming message that the punter can't lose because of all the incentives, money back, bonus bets etc. This issue must be addressed immediately.

Ken Wolfe, Frankston Victoria

I started gambling in the late eighties, when I was about 7 years old. I'm now 40.

When I was young my father often took me to the TAB. Gambling was a generational thing in my family and (chinese) culture. It was a social, community event. It was passed on to me from my father. I watched my parents gamble when I was young. Research I did, later in life, showed me that it came through from my grandfather, and even his father.

I first accessed gambling online via a desktop computer when the TAB started their website, I was 18 then. Online gambling was so accessible and when it got into the smartphone era it got very, very easy.

It was quick and easy to open an account. You didn't need to jump through too many hoops to open an account, you just needed some version of ID. You didn't even have to verify your bank account unless you wanted to withdraw money from your account. When the amounts of money betted increased you started to receive emails:

"Is there anything we can do for you? What are you interested in?"

That's when I got a special manager. They would have seen me gambling substantially higher amounts in a quicker amount of time; there was no real query of where the funds were coming from; they were more interested in prolonging the gambling.

They asked what sporting events I was interested in? Was it AFL, NRL, racing, are you interested in going to VIP events? They made you feel like you were part of their 'team'. Made to feel special. You get to sit in the elite section, you're a VIP.

I had lost a substantial amount. In the hundreds of thousands of dollars. It was this that led down to getting a line of credit for a few thousand which made it possible for me to keep gambling. It was at this point that I had to prove I had some form of income to pay it back. It was a loan, when I couldn't pay it back they chased it like a bank .

I stopped engaging with the specific betting company I was using at the time, I thought that would be ok, and when I decided to stop the person who had my data, had moved over to another betting company and started a line of credit and some free bets to open an account and start with them.

This is what I believe needs to change- there needs to be a way to check where the money is coming from, this should be part of the screening process to even open an account. You should need to prove you have a means of income that would stop you from betting excessively.

The big damage is caused to people who can't afford it, who spend money they can't afford or get it fraudulently.

There are too many gambling ads, too much of it - a massive number, not just luring the next generation but every generation into hearing and talking about it. The brands are in your face, too much infiltration wherever you look; on a tram, on a bus, on a wall. It's here, there and everywhere.

Gambling takes a lot more than money. It takes time, energy, your relationships, it takes your life. It has taken almost a decade to really reclaim my life, to understand how much it's taken and the why's and the reasons behind, it's not just the financial aspect, but what it takes out of you and into your future.

I am someone who has lived through gambling harm and I'm now trying to share that to help others.

Paul, Melbourne.

References

- AdNews. Australia's biggest advertising spenders 2021; 2022.
<https://www.adnews.com.au/news/australia-s-biggest-advertising-spenders-2021>
- Armstrong A, Carroll M. Gambling activity in Australia. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies; 2017
- David JL, Thomas SL, Randle M, Pitt H, Daube M. Parent and child perceptions of gambling promotions in Australian sport. *Health Promot Int.* 2020 Apr 1;35(2):362-372. doi: 10.1093/heapro/daz028. PMID: 30982902.
- Duffy L. Gen bet: a plain English summary of research into gambling and young people; 2021. Victorian Responsible Gambling Foundation, Melbourne.
- Livingstone C, Rintoul A. Moving on from responsible gambling: A new discourse is needed to prevent and minimise harm from gambling; 2020. *Public Health*,184, 107-112.
<https://doi.org/10.1016/j.puhe.2020.03.018>
- Freund M, Noble N, Hill D, White V, Evans T, Oldmeadow C, Sanson-Fisher, R. The prevalence and correlates of gambling in secondary school students in Victoria, Australia; 2017. Victorian Responsible Gambling Foundation, Melbourne.
- Gainsbury SM. Online Gambling Addiction: the Relationship Between Internet Gambling and Disordered Gambling. *Curr Addict Rep.* 2015;2(2):185-193. doi: 10.1007/s40429-015-0057-8. Epub 2015 Apr 11. PMID: 26500834; PMCID: PMC4610999.
- Hing N, Russell A, Rockloff M, Brown, M, Langham E, L E, Lole L, Greer N, Thomas A, Jenkinson R, Rawa V, Thorne, H. Effects of wagering marketing on vulnerable adults; 2018. Victorian Responsible Gambling Foundation, Melbourne.
- Hing N, Russell A, King D, Rockloff M, Browne M, Greer N, Newall P, Sproston K, Chen L, Coughlin S. NSW Youth Gambling Study 2020; 2020 Sydney: NSW Responsible Gambling Fund.
- King D. Online gaming and gambling in children and adolescents – Normalising gambling in cyber places; 2018. Victorian Responsible Gambling Foundation, Melbourne.
- Letts S. Chart of the day: Are Australians the world's biggest gambling losers? You can bet on it. ABC News. 20 November 2018.
- Miller H. Cadman F. Phillips T. Billi R. Byrne M. Discussion Paper: Seeking Help for Gambling Problems; 2014. Victorian Responsible Gambling Foundation. Victoria, Australia.
<https://responsiblegambling.vic.gov.au/documents/19/seeking-help-for-gambling-problems.pdf>
- Muggeleton N, Parpart P, Newall P. et al. The association between gambling and financial, social and health outcomes in big financial data. *Nat Hum Behav* 5, 319–326; 2021.
<https://doi.org/10.1038/s41562-020-01045-w>
- Pitt H, Thomas SL, Bestman A, Stoneham M, Daube M. "It's just everywhere!" Children and parents discuss the marketing of sports wagering in Australia. *Aust N Z J Public Health.* 2016 Oct;40(5):480-486. doi: 10.1111/1753-6405.12564. Epub 2016 Aug 14. PMID: 27524502.
- Pitt H, Thomas S, L Bestman, A. *et al.* Factors that influence children's gambling attitudes and consumption intentions: lessons for gambling harm prevention research, policies and advocacy strategies; 2017. *Harm Reduct J* 14, 11.
<https://doi.org/10.1186/s12954-017-0136-3>
- Rossi & Nairn. Appeal of Gambling Ads to Children, Young Persons and Adults. 2021.
<http://www.bristol.ac.uk/policybristol/policy-briefings/what-are-the-odds/>
- Suicide Prevention Australia & Financial Counselling Australia. "Gambling and Suicide Prevention: A Roadmap for Change." 2022.
https://www.suicidepreventionaust.org/wp-content/uploads/2022/02/Gambling-Report_2022.pdf

Thomas S, Lewis S. Conceptualisation of Gambling Risks and Benefits: A Socio-cultural Study of 100 Gamblers. Melbourne (AUST): Victorian Government Department of Justice Office of Gaming and Racing; 2011.

Thomas, SL, Pitt, H, Bestman, A, Randle, M, Daube, M, Pettigrew, S Child and parent recall of gambling

sponsorship in Australian sport; 2016. Victorian Responsible Gambling Foundation, Melbourne.

Victorian Responsible Gambling Foundation. 948 gambling ads daily on Victorian free to air TV in 2021; 2022.

<https://responsiblegambling.vic.gov.au/about-us/news-and-media/948-gambling-ads-daily-on-victorian-free-to-air-tv-in-2021/>