



**ALLIANCE FOR  
GAMBLING REFORM**

---

# **2023-24 PRE-BUDGET SUBMISSION**

ALLIANCE FOR GAMBLING REFORM

---

# Contents

<b>Introduction .....</b>	<b>1</b>
<b>Background – The Alliance for Gambling Reform .....</b>	<b>2</b>
<b>Background – Gambling harm in Australia .....</b>	<b>2</b>
<b>Key recommendations to reduce gambling harm in Australia .....</b>	<b>3</b>
1. Establish in a national gambling regulator .....	3
2. Increase public awareness of gambling and its harms through a multi-platform national gambling harm campaign.....	4
3. Promote and improve treatment and referrals for people experiencing gambling harm.....	5
4. Significantly increase funding for independent research to investigate the impacts of, and treatment for, gambling harm .....	6
<b>Conclusion.....</b>	<b>6</b>

## ■ Introduction

The Alliance for Gambling Reform is pleased to provide this submission to the 2023-24 Federal Budget process. Our submission is focussed on preventing and reducing all aspects of gambling harm in Australia.

This submission builds on our evidence provided to the Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm. We appeared before the Committee and provided additional evidence in late 2022.

Gambling harm is a public health issue that is rapidly growing and impacting millions of Australians. There is a critical need for an immediate national investment to reduce and prevent gambling harm. The Alliance has worked with people who have a lived experience of gambling harm, adopting an evidence-based public health approach in developing the policy positions and proposals outlined in this submission.

This submission recommends four urgent government actions be adopted in the 2023-24 Federal Budget:

- Establish a national gambling regulator
- Increase public awareness of gambling and its harms through a multi-platform national gambling harm campaign
- Promote and improve treatment and referrals for people experiencing gambling harm
- Significantly increase funding for independent research to investigate the impacts of, and treatment for, gambling harm

The alliance welcomes this opportunity to provide this brief Pre-Budget submission and would also welcome any further opportunities to provide more detail or discuss any aspect of this submission.

## ■ Background – The Alliance for Gambling Reform

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 minimise 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.

## ■ Background – Gambling harm in Australia

Australians lose more to gambling per capita than any other country in the world, more than 40% than the second-placed country, Singapore. Further, Australians gamble 20% more online than any other country in the world per capita<sup>1</sup>

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.

---

<sup>1</sup> H2 Gambling Capital, <https://h2gc.com/>

## ■ Key recommendations to reduce gambling harm in Australia

### 1. Establish in a national gambling regulator

#### *The problem*

Gambling regulation in Australia has been called a ‘regulatory jigsaw’<sup>2</sup> – a system which lacks clarity and consistency. It is difficult to navigate which jurisdiction or regulatory body is responsible for the various areas of gambling including advertising, online gambling, breaches of codes of conduct, and unlicensed or prohibited gambling platforms. As a consequence, breaches of existing regulations and requirements often go unnoticed and unmonitored. The recent casino inquiries have revealed the disregard many in the gambling industry have for regulatory controls and legal requirements. It seems when there is gambling profits to be made, the laws and regulations can be largely ignored. Time and again we see State and Territory regulators failing to hold large gambling companies to account to the point where many Australians rightly view gambling regulation as an ineffectual joke.

#### *The solution*

There is an urgent need for a fit for purpose national online and casino regulator that also includes an ombudsman’s office to handle disputes and complaints.

#### *The investment*

The Victorian regulator, the Victorian Gambling and Casino Control Commission (VGCCC) received funding of \$42.422 million for 2021-22. The Alliance suggests a national regulator would need double this amount and believes an allocation of \$85 million is appropriate.

---

<sup>2</sup> Associate Professor Chales Livingstone, Online Gambling submission

## **2. Increase public awareness of gambling and its harms through a multi-platform national gambling harm campaign**

### *The problem*

Public awareness of the risks of gambling associated harms are mixed. Knowledge about the negative impact of gambling is concentrated amongst those who have personally experienced harm from gambling, or who have a close relationship with someone who has experienced significant harm. The current 'responsible gambling' ideology and associated 'blaming the victim and ignoring the product' narrative serves the gambling industry well as it once did the tobacco and alcohol industry, until they were treated as a serious public health issue.

### *The solution*

If Australia is to change our relationship with gambling, we must apply the same lens as we would to any other issue negatively impacting the health and wellbeing of millions of Australians, we must adopt a public health approach to gambling. We need a much stronger focus of reducing the harm and seriously analysing the gambling products available to every Australian with a mobile phone. It is essential that the federal government works with public health leaders, as well as people who have experienced harm from gambling, to develop a public awareness campaign that mirrors the effectiveness of public health campaigns like road trauma and alcohol harm. It is not inconsistent to argue that a legal product that can be used safely – e.g. cars and alcohol – also needs to be very carefully regulated, controlled and managed from a public health perspective.

### *The investment*

A comprehensive multi-platform multi year campaign would cost approximately \$5 million.

### **3. Promote and improve treatment and referrals for people experiencing gambling harm**

#### *The problem*

Access to appropriate treatment for people experiencing significant gambling harm is woefully inadequate across Australia. There is a lack of specialist services, and an inconsistent approach to treating and referring people experiencing gambling harm. The processes that do exist are not sufficiently evaluated and reviewed for effectiveness. Gambling has a vast range of co-morbidities ranging from mental health problems, alcohol harms and family violence. In practice this means there are many health professionals who need to be better trained in recognising, supporting or referring those who are experiencing harms from gambling.

#### *The solution*

1. A certified independent training module for staff involved in gambling related businesses and people working with those with issues linked to gambling related harms (for example helpline services). This would ensure the workforce who may be exposed to people experiencing gambling harm are better equipped with the necessary knowledge.
2. Ongoing independent evaluation and review of all Gamblers Help services to ensure the current treatment services are meeting their objectives.

#### *The investment*

The cost of these training programs and better use of existing resources is approximately \$5 million per annum

## **4. Significantly increase funding for independent research to investigate the impacts of, and treatment for, gambling harm**

### *The problem*

Research into gambling and related harm is slowly increasing, however, much of the current research is undertaken by vested interests – usually either the gambling industry or State governments who receive substantial income from gambling companies and often have a strong relationship with the gambling industry. Federal government funded research through independent research focused organisations is rare, but the benefits of having good quality research into gambling and related harms would be very significant. If Australia is to reduce the toll of gambling related harm on our productivity, health and wellbeing, there needs to be a much greater investment and redirection of existing funding to enable quality independent research into gambling in Australia.

### *The solution*

Significantly increase the funding available for quality independent research into gambling in Australia.

### *The investment*

The Alliance believes an allocation of \$5 million per annum is needed to deliver this recommendation.

## **Conclusion**

In order to tackle the growing impact of gambling harm in Australia, there is a need for an urgent national health approach including core elements of public awareness, prevention and early intervention, treatment and education and research.

The Alliance urges the federal government to consider establishing a national regulator to oversee the core areas of its responsibility – the online and casino gambling industry. In addition, we call for a multi-platform campaign over a number of years to educate the public about the risks associated with gambling, improve and promote effective treatment services and significantly increase funding for independent research. By taking these initial steps applied with a public health approach, the Australian community will see a reduction in the health, social and economic costs of gambling and be in a better position to protect future generations from gambling harm.



**ALLIANCE FOR  
GAMBLING REFORM**

Our Community House,  
552 Victoria St, Wurundjeri Country,  
North Melbourne 3051, VIC  
p. (03) 9999 7372 | f. (03) 9347 9933  
e. [info@agr.org.au](mailto:info@agr.org.au)

For all media enquiries, please contact  
0491 209 436 | [media@agr.org.au](mailto:media@agr.org.au)

