



**ALLIANCE FOR
GAMBLING REFORM**

Alliance for Gambling Reform
Online Gambling Policy

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Executive Summary

Harm from gambling is a serious public health issue that is growing rapidly and directly impacting millions of people, as well as placing a burden on the economy. Australians lose the most to gambling per capita, at around double the average of other Western Countries¹. The gambling industry has expertly crafted a system which is not only very profitable but also makes significant direct contributions to politicians and political parties that form our governments. Taxes derived from gambling are often placed in state hospital, mental health and charities funds which makes it difficult for governments to justify regulatory changes that would reduce tax revenue.

Australians of all ages are saturated by gambling images and promotions at pharmacies, veteran services, news agencies, sporting grounds, on television, on social media and radio. In Australia, (unlike most countries) gambling is normalised and celebrated which has contributed to the highest levels of gambling losses per capita in the world². With such devastating losses comes the need for extensive support services for those who experience gambling harm from their own or someone else's gambling. However, for the many that are in need of help, access to the limited support services that are available is often both opaque and 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 have inordinate influence over the terms of regulation as an important 'stakeholder' to governments. Industry has greater access and means to influence government than other stakeholders including those with lived experience and harm reduction expertise. The industry is a powerful lobby group that has been able to gain commitments from governments through Memorandums of Understanding (MOUs).

The gambling industry preys on its customers to maximise profit. 'Loyal' customers - people who spend beyond their means and continue gambling regardless of their financial situation, are provided with inducements and 'rewards' to increase patterns of loss and spending. This is why reducing harm means reduced profits.

On a national level, the National Consumer Protection Framework (NCPF) has achieved some important reforms including activity statements, improved messaging on gambling advertisements and a ban on credit for online gambling. These measures do not address the fundamental drivers of gambling harm and so much more needs to be done.

¹ Armstrong A, Carroll M. Gambling activity in Australia. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies; 2017

² Letts S. Chart of the day: Are Australians the world's biggest gambling losers? You can bet on it. ABC News. 20 November 2018.

There is limited research funding to develop independent studies on gambling harm and evidence-based policy is elusive. Governments do not invest in independent harm reduction bodies or measures, preferring to establish government-controlled entities that will not challenge light touch policy, regulation or enforcement. Online gambling has evolved so swiftly that research, policy, regulation and governments have not been able to keep up to 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 all Australians from rapidly emerging technological developments being weaponised by an industry for profit. The systems preventing and limiting gambling harm across this country are in serious need of overhaul.

Recommendations

1. Reduce exposure to online gambling harm in Australia
 - a. Restrict online exposure to gambling for children and young people
 - b. Ban the broadcasting of all gambling advertisements
 - c. Ban all forms of online promotion, advertising and inducements and increase enforcement actions against companies breaching these restrictions
 - d. Regulate technologies in gaming such as loot boxes which have the potential to increase gambling harm
 - e. Increase enforcement actions against companies breaching these restrictions
2. Establish national regulation to address online gambling harm
 - a. Establish an independent, adequately funded national gambling regulator and online gambling ombudsman
 - b. Establish a national strategy addressing gambling related harm through a public health approach recognising that, like other harmful products such as tobacco and alcohol, gambling requires strong regulation and long overdue reform that prevents and reduces harm, and that this approach will have an overall positive impact on the economy
3. Reduce unintended losses online
 - a. 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 and decrease stigma
 - a. Implement a national multi-platform gambling harm campaign staged across a number of years to inform different segments of the community and provide access to resources and guidance for those seeking help for gambling related harm
 - b. Change language from 'responsible gambling' and 'problem gambler' to 'harm prevention' and 'gambling harm' in all legislation, regulations, policies and across agencies where these terms are referenced
 - c. Federal funding to support financial institutions to promote harm minimisation options, identify those at risk and develop advice and referral options for people at risk of gambling harm
5. Provide increased education and training on gambling harm
 - a. All staff involved in gambling related online activity should be independently trained and accredited in awareness and support for people experiencing gambling harm
 - b. Accredited, independent training for staff who work in helplines or services who may be contacted by someone experiencing gambling harm alongside common

co-morbidities including suicide, mental health problems, veteran support or family violence.

- c. Develop and implement a nationally consistent, evidence based, education curriculum for both primary and secondary schools about gambling and its potential harms. Evaluate and review the curriculum as new technologies arise and develop
6. Improve treatment for people experiencing gambling harm
 - a. Provide ongoing regular evaluation and recommendations to improve the services available to people seeking help for gambling issues
 - b. Provide all medical and health professionals (including helpline operators) with an up to date set of guidelines (including [language guide](#)) and referral options
 - c. Provide an independent gambling harm national services directory
 7. Increase research and support for best practice approaches to gambling harm
 - a. 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
 - b. Legislate that bookmakers must share unidentified data with governments and researchers that help understand gambling harms as part of their licence conditions. This could be in the form of a National Gambling Reporting System³
 - c. Establish independent, regular evaluations and reviews of
 - i. Education programs for schools and the gambling industry workforce
 - ii. Support services in person, online and over the phone
 - iii. Gambling harm minimisation tools such as limit setting and self-exclusion technology
 - d. Develop a comprehensive national data set that enables analysis to support best practice policy and regulation

³<https://www.churchilltrust.com.au/project/to-investigate-international-lessons-for-public-health-policy-and-improved-regulation-of-gambling/> and <https://responsiblegambling.vic.gov.au/about-us/news-and-media/game-changers-how-european-regulators-are-tackling-gambling-harm/>

Background

Australian context:

The Interactive Gambling Act 2001 (IGA) is the key piece of federal legislation that sets the rules for bookmakers licenced in Australia, it also prohibits offshore bookmakers as well as online casinos and in-play sports gambling. The IGA has been amended twice, once in 2017 to ensure offshore bookmakers were not providing illegal gambling services with additional reforms undertaken by the national regulator, the Australia Communications and Media Authority (ACMA). An additional amendment was made to the Act in 2019 to allow ACMA to introduce a National Self Exclusion Register⁴. Other than those two amendments, not much has been changed nationally in response to the rapidly developing online gambling environment. However, on 15 September 2022, the federal government announced an inquiry into online gambling and its impacts on those experiencing gambling harm. A report from this inquiry is yet to be handed down.

Australian states and territories also have Gambling Regulation Acts (or similarly named) that have different legislation and guidelines for how online gambling is regulated in their state. Each jurisdiction has a different taxing system for online gambling revenue which is called the Point of Consumption Tax (POCT). A good example of the use of legislation for harm reduction in one state is that in South Australia, bookmakers cannot offer or advertise inducements directed at encouraging people to gamble. South Australia shows that there is an opportunity for states to take different and more proactive approaches to online gambling harm prevention. It is often an excuse of states and territories that 'online gambling is a big problem' when discussing their roles in mitigating harm by poker machines, however, there are several levers' states and territories can pull to reduce online gambling harm too.

The research on the growing negative impacts online gambling is having on the Australian community is still developing, however there are a number of strong research papers that highlight the need for urgent and significant reforms. Strong evidence is available that shows gambling online increases harm as well as the risk of harm. It is available 24 hours a day 7 days a week, there is a constant reminder of that accessibility through advertising and there are significant inducements provided by bookmakers to entice people to gamble beyond their means. Gambling Research Australia found that at least 34% of those who gambled online were likely to experience harm, compared to 15.6% of people who gambled on poker machines⁵.

International context

A number of the recommendations made in this paper reflect international success when it comes to implementing reforms that reduce harm. There is much to learn from several countries. Australia has, per capita, the highest gambling losses which makes the need to

⁴ <https://www.acma.gov.au/about-interactive-gambling-act>

⁵ <https://www.gamblingresearch.org.au/sites/default/files/2021-10/Final%20IGS%20report%202021.pdf>

implement evidence-based reforms from overseas of critical importance. It is paramount there is no delay in implementing the learnings from overseas jurisdictions to prevent and reduce harm⁶.

Europe:

Belgium has recently undertaken several approaches to reduce harm that could be readily replicated by Australia. First, in 2020 Belgium introduced a mandatory cap on the online gambling spend of 500 Euro a week and was changed to 200 Euro two years later as the harm being experienced was still considered too high. Belgium has also recently announced that almost all forms of online gambling advertising are to be banned from mid-2023⁷.

At the start of 2019, Italy banned almost all gambling advertisements including on TV, radio, press and internet marketing. They also have strong fines in place for those who breach the law. Meta was fined 750,000 Euros for breaching the ban in early 2023⁸.

In 2021 Germany introduced a 'State Treaty on Gambling' mandated that online casinos, poker and virtual slot operators be prohibited from advertising on radio, TV and the internet between 6am and 9pm. Active athletes and officials are also not allowed to participate in advertisements⁹. Germany has also announced a blanket mandatory deposit limit of 1000 Euros a month across all forms of gambling¹⁰.

The Netherlands has introduced a ban which stipulates that online gambling ads cannot reach those under the age of 24 as well as those with a gambling addiction. There will also be a ban on sport sponsorship which is effective from 2025¹¹. Belgium, Italy and the Netherlands have restrictions on most sports gambling marketing including betting ads during football matches and full sponsorship bans.

Spain limits the broadcast of gambling ads to between 1am and 5am when young people are less likely to be exposed. Sweden, Spain and Ireland have mandatory pre-commitment systems however bookmakers are not linked - meaning it's possible to reach a limit with one bookmaker then move to another.

⁶ The Alliance acknowledges that every context is slightly different when it comes to gambling online, for example, online casinos are illegal in Australia where they are not in many other countries.

⁷<https://www.brusselstimes.com/262590/belgium-to-put-e200-weekly-limit-on-online-gambling-to-tackle-addiction>

⁸ <https://www.gamingtechlaw.com/2023/01/meta-fine-italian-gambling-advertising-ban/>

⁹ <https://www.lexology.com/library/detail.aspx?g=81a1ed2d-801e-4a54-82ec-9a02384492e2>

¹⁰<https://www.cliffordchance.com/content/dam/cliffordchance/briefings/2021/07/new-german-interstate-treaty-on-gambling-entered-into-effect.pdf>

¹¹<https://igamingbusiness.com/legal-compliance/legal/dutch-advertisers-must-prove-online-ads-cant-reach-under-24s/>

In the UK there has been a strong call for gambling advertisements to be banned following an investigation that found there were over 716 'exposures' to gambling via logos in view during football matches¹². Like Australia, the UK has a ban on TV adverts during live sports events however this measure is clearly limited by logos on sports jerseys and advertisements in stadiums. The UK has also recent planned gambling ads that feature sports and reality TV stars¹³. Recently a White Paper outlined how the UK government plans to work with the regulator and others to reform the regulation and legislation governing the gambling sector¹⁴.

USA and Canada

Online gambling and sports wagering has only recently become legal in some states in the USA and some gambling harm minimisation measures are currently in place with states taking specific action to reduce and prevent harm. For example, the state of Massachusetts has implemented a voluntary self-exclusion scheme for all forms of gambling including either casino gambling or sports wagering or both¹⁵.

Canada is like the US in that each province regulates gambling differently - provinces like Nova Scotia have previously taken action on 'slot machine' gambling but have been slower to act on online gambling harm minimisation measures.

Asia

Many Asian countries have strict gambling regulations, and many do not allow gambling unless it is in a casino. In some countries it is completely banned. For example, gambling in South Korea is completely banned, and in Japan 'integrated resorts' were legalised however Japanese citizens can only visit these casinos three times a week or ten times a month. In Cambodia online gambling is banned (although it was legal from 2015 to 2020) and casinos are restricted to foreigners.

In Vietnam gambling was illegal for a long time, but recently there was legalisation of football, horse racing and greyhound racing and the opening of casinos. Locals are only allowed into the casinos if they can provide evidence that they earn a certain amount of money.

China only has a few legal forms of sports gambling, specifically state-run sports lotteries which includes scratch and win lotteries, sports lotto and football and basketball lottery. There are also a few Casinos in Macau in which online gambling and casino gambling are legal.

Although there has been a relaxation of gambling laws in various countries in Asia, there do appear to be much stricter regulations than in Australia.

¹²<https://theconversation.com/gambling-act-review-how-eu-countries-are-tightening-restrictions-on-ads-and-why-the-uk-should-too-199354>

¹³<https://www.theguardian.com/society/2022/apr/05/uk-to-ban-gambling-ads-featuring-sports-and-reality-tv-stars>

¹⁴<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age>

¹⁵<https://massgaming.com/about/voluntary-self-exclusion/>

Key Issues

Exposure to online gambling in Australia

Advertisements

Gambling products are readily advertised in Australia to the point of saturation. An example of this is in Victoria on free to air television 948 gambling ads on average were shown every day in 2021¹⁶. Gambling is also promoted at pharmacies, news agencies, on billboards, stadiums, sports jerseys, radio, social media, and print media. The restrictions placed on advertising in Australia are minimal and do not stop children and vulnerable people being exposed multiple times a day to gambling advertisements and inducements to gamble.

Online gambling advertising on social media is under-regulated and unchecked. Sometimes even illegal forms of gambling such as online casinos can be promoted on social media. The downfall of the regulation happening in this area is that it usually needs to be reported to be assessed and often people do not know when they are being subject to is illegal or where to report it. The advertising is also not consistently delivered to all users, so unless a screenshot is taken, once the user scrolls past the advertisement it may not ever be seen again, making enforcement of regulations impossible.

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 gambling¹⁷. Further, the celebrity endorsements lessened the perceived risks of gambling for young people as they trusted the person supporting the product¹⁸. It has been found that around 40% of young people under the age of 16 had engaged in formal or informal gambling¹⁹. Young people experiencing harm now and into the future is a major children's rights issue that must immediately be addressed.

¹⁶ 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/>

¹⁷ 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.

¹⁸ 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.

¹⁹ 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>

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 days²⁰. Hing et al found that, on average, young people aged 11 to 12 years old started simulated gambling and monetary gambling at much the same age²¹.

In 2016, one in four children could name four gambling brands or more²². 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, making exposure to children much greater²³.

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 betting²⁴. 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. Thirty-four per cent of Australian young people made in-game purchases in 2017.

Loot boxes 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

²⁰ 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.

²¹ 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.

²² 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.

²³ 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/>

²⁴ 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.

vary in value. Loot boxes can be earned with skilful play; however, it is common for people to purchase loot boxes. Duffy highlights that ‘in the sense that loot boxes involve staking money on an outcome determined by chance, they are very similar to gambling²⁵.’

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 people²⁶.

‘Co-regulation’ with industry: a failure of Australian regulation

National regulation

There have been many calls for a restructure of gambling regulation in Australia. In 2021 and 2022, there were casino reviews, inquiries and Royal Commissions in most jurisdictions highlighting significant regulatory failure. An NSW Crime Commission report in 2022 found evidence of money laundering and widespread crime in pubs and clubs across NSW. There is increased advertising, promotion, 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 a public health focus and gambling harm minimisation at the core of its purpose.

Industry-led measures:

Due to the constant accessibility of 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.

²⁵ Duffy L. Gen bet: a plain English summary of research into gambling and young people; 2021. Victorian Responsible Gambling Foundation, Melbourne.

²⁶ King D. Online gaming and gambling in children and adolescents – Normalising gambling in cyber places; 2018. Victorian Responsible Gambling Foundation, Melbourne.

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

Online gambling has unique risks that need to be addressed 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 spent²⁷. The nature of gambling on a smart phone makes it much more private, easy to hide, and possible to bet with multiple bookmakers at once.

Increasing public awareness

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 required²⁸.

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 culture²⁹. 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.

²⁷ 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.

²⁸ 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>

²⁹ 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.

Education and training

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. Some programs are funded by industry and their content and appropriateness is questionable.
- 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 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 often 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. 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 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 including sufficient fines for breaches. 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.

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.

Treatment and research needs

For someone who is experiencing gambling harm, either due to their own gambling or someone else's gambling there are several 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 like that of Victoria's.

People may also flag they need 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.

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 thorough evaluation 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 indicated³⁰. 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 the UK or any other country in the world.

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 and provide public benefit and value for taxpayer funding.

³⁰ Muggleton 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>

Conclusion

The online gambling industry has grown rapidly and taken advantage of weak government regulation to increase their profits, causing significant harm to our communities. National reforms such as the National Self Exclusion Scheme Betstop have taken too long to implement and the impact of that is widespread harm that could have been prevented. The community sentiment around issues like gambling advertisements is very clear, people want and need to see change, not excuses for delays which have been a hallmark of Australian gambling regulation to date.

Australia can learn from international counterparts who have already implemented sensible reform which put public interest at the forefront of harm reduction efforts. There needs to be a national, public health response to gambling harm prevention and minimisation. It requires the gambling industry to corroborate with the need for meaningful data and information and not be considered as a 'stakeholder' whose sustainability is the primary concern of governments. It requires significant change in approach to a public health and harm reduction focus.

This report outlines 21 recommendations that would substantially reduce harm that is currently going unchecked due to regulatory failure and largesse. These changes will save lives. They will reduce the impact of gambling harm in our community, reduce strain on our health services and lead to a healthier Australia that we all want to live in.



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