

**HOBSONS**  
**BAY CITY**  
COUNCIL



# Gambling Harm Prevention Policy Statement

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Draft (May 2023)

### **Acknowledgment of Country**

Council acknowledges the Bunurong People of the Kulin Nation as the Traditional Owners of these municipal lands and waterways, and pay our respects to Elders past, present and emerging.

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# 1. Introduction

Gambling is a legal activity in Australia. However, gambling also causes harm in local communities.

Research shows that harm from gambling occurs across multiple 'domains', and can affect financial security, physical and mental health, work and study performance, and personal relationships (including the incidence or escalation of family violence).<sup>1</sup> While some gambling is not harmful, research indicates that the overall social costs of gambling activities may outweigh the benefits.<sup>2</sup> Additionally, research has shown that the impacts of gambling harm are unevenly spread, disproportionately affecting vulnerable groups and locations.<sup>3</sup>

In Hobsons Bay, electronic gaming machines (EGMs) have contributed to gambling harm over many years. Since their introduction in 1992, more than \$1.2 billion has been lost in Hobsons Bay, with research indicating that more than 40 per cent of regular (monthly) EGM users experience some level of harm.<sup>4</sup> More recently, online gambling has become a more prominent source of harm, with state-wide losses reaching an estimated \$2.58 billion in 2021-22, an increase of 50 per cent since 2019-20. Local data is not available for online gambling, but it is likely that Hobsons Bay residents have experienced similar trends.

Council's Gambling Harm Prevention Policy Statement adopts a public health approach to addressing gambling harm in Hobsons Bay. This approach focuses on the prevention of gambling harm by addressing harmful products and environments, not just addressing the individual behaviours of people at experiencing or at risk of gambling harm. In doing so, it seeks to address the 'determinants of gambling harm' that shape individual behaviour, including a range of sociocultural, environmental, commercial and political factors.

**Through this Policy Statement, Hobsons Bay City Council affirms its commitment to a public health approach to preventing harm from gambling. This approach is consistent with Council's role to protect, improve and promote public health and wellbeing, as required under the *Public Health and Wellbeing Act 2008*.**

## 2. Purpose and scope

The purpose of this Policy Statement is to guide Council's efforts to prevent harm from gambling in Hobsons Bay. It specifically aims to prevent harm from EGMs and online gambling as much as possible, and within the scope of Council's roles and responsibilities. These include advocacy for legislative and regulatory reform and through Council's land use planning role in developing policy and assessing EGM-related planning applications.

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<sup>1</sup> Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T (2016) *Assessing gambling-related harm in Victoria: a public health perspective*, Victorian Responsible Gambling Foundation, Melbourne. Accessed March 2023.

<sup>2</sup> Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M (2017) *The social cost of gambling to Victoria*, Victorian Responsible Gambling Foundation, Melbourne. Accessed March 2023.

<sup>3</sup> Armstrong, A., & Carroll, M. (2017) *Gambling activity in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies. Accessed March 2023.

<sup>4</sup> Ibid.

Research indicates that EGMs and online gambling are amongst the most harmful forms of gambling and have the greatest impact on our community (see Section 3.2).<sup>5</sup> Other harmful gambling products (such as casino table games and private betting) are out of scope for this Policy Statement, as are less harmful products (such as bingo, instant scratch tickets and lotteries).

The priority areas and commitments presented in this Policy Statement are informed by research, preliminary engagement and an understanding of Council's roles and responsibilities. This Policy Statement represents our commitment to a public health approach, as well as informing Council's land use planning role in developing policy and assessing gambling-related planning applications. The Policy Statement also recognises Council's more limited role in preventing harm from online gambling, which is focussed primarily on advocacy, raising community awareness, promoting support services, and monitoring data and research.

This Policy Statement replaces Council's Problem Gambling (Electronic Gaming Machine) Policy Statement 2015.

### 3. Context

#### 3.1. Overview of health and wellbeing impacts of gambling harm

Research has found that harm from gambling occurs across several domains, including relationships, health, psychological wellbeing and financial security.<sup>6</sup> Varying levels of harm are experienced across the population, including for low-risk and moderate-risk gamblers.<sup>7</sup> Research has found that 85 per cent of the total harm from gambling in Victoria arises from low-risk gambling and moderate-risk gambling.<sup>8</sup>

Harm from gambling is experienced not only by individuals, but also by families, friends, workplaces and local communities. At an individual level, gambling harm is known to exacerbate and contribute to other issues such as mental ill-health, use of alcohol, tobacco and other drugs, family violence and homelessness.<sup>9</sup> At the population level, the estimated cost to Victorian communities has been estimated at \$7 billion for 2014-15, which includes the costs to our governments, local communities, businesses, families and the individual.<sup>10</sup>

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<sup>5</sup> Ibid.

<sup>6</sup> Browne et al (2017). Accessed March 2023.

<sup>7</sup> The Problem Gambling Severity Index (PGSI) measures the severity of gambling harm. It uses the following categories:

- Non-problem gambler – gambles with no negative consequences.
- Low-risk gambler – experiences a low level of problems with few or no identified negative consequences.
- Moderate-risk gambler – experiences a moderate level of problems leading to some negative consequences.
- Problem gambler – gambles with negative consequences and a possible loss of control.

This Policy Statement avoids using the term 'problem gambler' as it reinforces stigma experienced by people experiencing gambling harm. However, it follows the PSGI framework that the risk and experience of gambling harm is not uniform and occurs with varying levels of severity. See Victorian Responsible Gambling Foundation (n.d.) *Problem Gambling Severity Index*, <https://responsiblegambling.vic.gov.au/for-professionals/health-and-community-professionals/problem-gambling-severity-index-pgsi>

<sup>8</sup> Miller, H. (2017) Hidden harm: Low-risk and moderate-risk gambling, Victorian Responsible Gambling Foundation, Melbourne – accessed March 2023.

<sup>9</sup> Ibid.

<sup>10</sup> Browne et al (2017). Accessed March 2023.

Higher availability and accessibility of gambling venues and EGMs contributes to increased harm. Data and research show that locations with higher numbers of EGMs generally experience higher losses<sup>11</sup> and research has also linked a higher concentration of EGMs to higher rates of family violence.<sup>12</sup> Availability and access to EGMs is also a key factor that normalises gambling in local communities, particularly for vulnerable groups such as children and young people.<sup>13</sup>

Research also indicates that some groups in our community are more likely to experience harm from gambling. Compared to people who do not experience harm from gambling, the following groups are significantly over-represented amongst those who do experience harm: men, people aged 18-29, First Nations people, people who are unemployed or not employed, as well as people who are single, renting, living in stressed communities, and living on low incomes or receiving income support payments.<sup>14</sup> Social and personal factors such as mental ill-health, social isolation, financial insecurity, mortgage stress, and socio-economic disadvantage all increase the risk of experiencing gambling harm.<sup>15</sup>

### 3.2. Gambling in Hobsons Bay

Table 1 shows the proportion of regular (monthly) gamblers who are exposed to risk from different gambling products. The highest risk products include poker (46.3% of participants at risk of harm), casino table games (44.7%), private betting (43.4%), EGMs (41.5%), race betting (41.4% and sports betting (40.7%). Other gambling products are less likely to cause harm.

Table 1: Proportion of regular (monthly) gamblers at risk of harm from various gambling products (adapted from Armstrong, 2017)

	Lottery	Instant scratch tickets	EGMs	Race betting	Sports betting	Keno	Casino table games	Bingo	Private Betting	Poker
<b>Any risk (%)</b>	13.2	18.2	<b>41.5</b>	<b>41.4</b>	<b>40.7</b>	32.6	44.7	31.5	43.4	46.3
<b>Severe and moderate risk (%)</b>	6.1	10.3	<b>23.3</b>	<b>21.9</b>	<b>23.4</b>	19.9	30.0	11.9	26.7	39.4

This Policy Statement will focus specifically on preventing harm from EGMs and online gambling, which includes race and sports betting. These will be prioritised as they are

<sup>11</sup> Victorian Gambling and Casino Control Commission (n.d.) Gambling expenditure data, <https://www.vgccc.vic.gov.au/resources/information-and-data/expenditure-data> - accessed February 2023.

<sup>12</sup> Markham, F., Doran, B., & Young, M. (2016) 'The relationship between electronic gaming machine accessibility and police-recorded domestic violence: A spatio-temporal analysis of 654 postcodes in Victoria, Australia, 2005–2014', *Social Science & Medicine*, 1–9. <http://doi.org/10.1016/j.socscimed.2016.06.008> - accessed February 2023.

<sup>13</sup> Bestman, A., Thomas, S., Randle, M. and Pitt, H. (2017) 'Children's attitudes towards Electronic Gambling Machines: an exploratory qualitative study of children who attend community clubs', *Harm Reduction Journal*, 14:20, <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-017-0148-z> - accessed February 2023.

<sup>14</sup> Armstrong & Carroll (2017). Accessed February 2023.

<sup>15</sup> Rintoul, A., & Deblaquiere, J. (2019) *Gambling in Suburban Australia (Research Report)*, Melbourne: Australian Institute of Family Studies. Accessed February 2023.

higher risk products, but also due to the scale of the losses in Hobsons Bay and Council's capacity to influence outcomes, particularly for EGMs.

### **Electronic Gaming Machines**

In 2021-22, \$34.8 million was lost on EGMs in Hobsons Bay at a rate of \$129,479 for each day that gaming venues were open (see Table 2).<sup>16</sup> This represents a 3.5 per cent increase on the average daily losses from 2020-21. On average, \$444 was lost per adult in Hobsons Bay during 2021-22, which is the 11<sup>th</sup> highest per adult in Greater Melbourne.

Data from the first half of the 2022-23 financial year show that this trend has continued, with a further 5.1 per cent increase in average daily losses. Notably, an estimated \$45 million has been saved on EGMs in Hobsons Bay in recent years due to the closure of gaming venues arising from COVID-19 health restrictions (see Table 2).

*Table 2: Losses (and estimated savings) from EGMs in Hobsons Bay, 2018-19 to 2022-23*

<b>Year</b>	<b>Total Losses (\$)</b>	<b>Daily (\$)</b>	<b>Estimated savings during COVID-19 restrictions (\$)</b>
<b>2022-23</b> (Jul-Dec)	25,042,832	136,102	n/a
<b>2021-22</b>	34,829,849 (open 269 days)	129,479	12,006,869 (closed 96 days)
<b>2020-21</b>	25,889,811 (open 207 days)	125,072	20,558,805 (closed 158 days)
<b>2019-20</b>	34,611,659 (open 266 days)	130,119	12,888,486 (closed 100 days)
<b>2018-19</b>	47,042,974	128,885	n/a

There are currently 535 EGMs operating in Hobsons Bay across nine venues (see Figure 1). In 2017, the Victorian Government set Hobsons Bay's municipal cap at 577 EGMs. Therefore, there is capacity for growth in the number EGMs in Hobsons Bay.<sup>17</sup> The current number represents a density of 6.9 EGMs per 1,000 adults, which is the equal third highest in Greater Melbourne. Research indicates that around 14 per cent of Victorian adults use EGMs, which puts the losses per EGM user in Hobsons Bay during 2021-22 at approximately \$3,470.

In 2021-22, more than half of EGMs losses in Hobsons Bay occurred in three venues: Millers Inn Hotel (located in Altona North), Seagulls Nest (Newport) and Club Laverton (Laverton). Combined, these venues attracted \$20.7 million (59.6%) of the \$34.8 million lost. Appendix 11.3 presents the losses at each venue by total (and per EGM) across the year. The Millers Inn had the highest losses in 2021-22, with \$141,317 lost per EGM.

<sup>16</sup> Public health restrictions arising from the COVID-19 pandemic led to the closure of gaming venues during the 2019-20, 2020-21 and 2021-22 financial years. As such, average daily loss figures are used to enable comparisons over time.

<sup>17</sup> Victorian Gambling and Casino Control Commission (n.d.) Gaming machine regional caps and limits, <https://www.vgccc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/caps-and-limits/gaming-machine> - accessed February 2023.



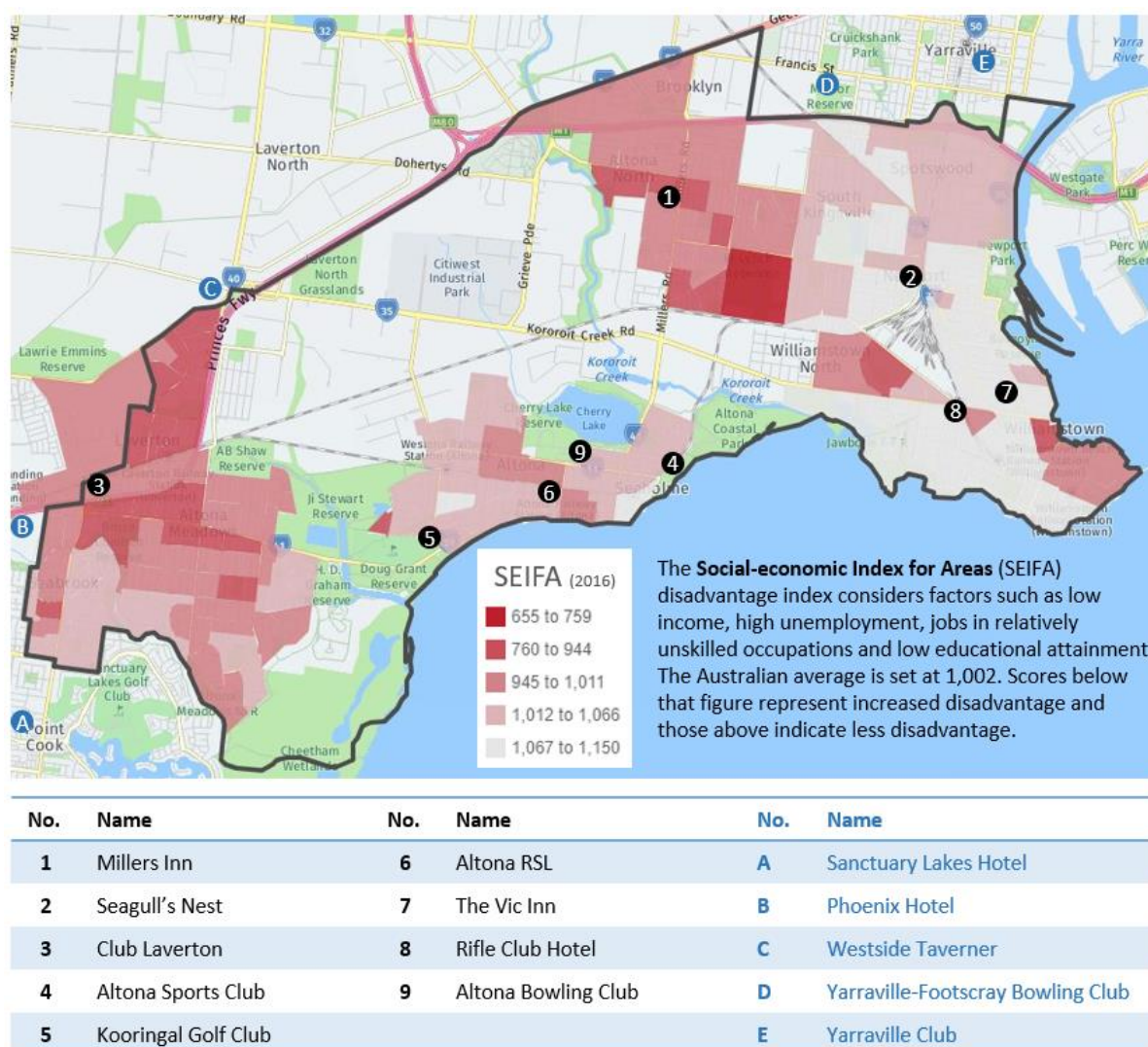


Figure 1: Gaming venues in and around Hobsons Bay

### Online gambling

There has been a substantial increase in spending on online gambling in Victoria in recent years (see Table 3). Data published by the State Revenue Office shows that estimated losses from sport and race betting increased from \$1.65 billion in 2019-20 to \$2.58 billion in 2021-22, an increase of more than 50 per cent in two years.<sup>18</sup> Although data from online gambling is not available at a local level, it is likely that these trends also occurred in Hobsons Bay. The COVID-19 pandemic contributed to this rapid growth, supported by significant spending by the gambling industry on advertising, which saw an average of 948 gambling ads broadcast daily on Victorian free-to-air television in 2021.<sup>19</sup>

<sup>18</sup> Victorian Responsible Gambling Foundation (n.d.) Expenditure on gambling in Victoria, <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/expenditure-on-gambling-victoria-and-australia>, accessed February 2023.

<sup>19</sup> Victorian Responsible Gambling Foundation, (n.d.) 948 gambling ads daily on Victorian free to air TV in 2021, <https://responsiblegambling.vic.gov.au/about-us/news-and-media/948-gambling-ads-daily-on-victorian-free-to-air-tv-in-2021/> - accessed February 2023.

Table 3: Losses from online gambling in Victoria, 2019-20 to 2021-22

Year	Losses (\$ millions)	% change
2021-22	2,578.0	10.6%
2020-21	2,330.6	39.6%
2019-20	1,669.4	n/a

### 3.3. Vulnerable groups in Hobsons Bay

As noted in Section 3.1, research indicates that some groups are more likely to experience harm from gambling than others. In Hobsons Bay, these groups make up a substantial proportion of the population<sup>20</sup>, including:

- Older people (aged 60+) make up 21.9 per cent of the population.
- People aged 18 to 34 make up 20.5 per cent of the population.
- People born overseas make up 30.1 per cent of the population
- People with a disability represent 17 per cent of the population<sup>21</sup>

Research also identified indicators of risk that may increase the potential for gambling harm. In Hobsons Bay, the following population groups may be at higher risk of experiencing gambling harm:

- Unemployed adults, who make up 3.5% of the population, with the rate higher in some neighbourhoods<sup>22</sup>
- People living in rental properties, who make up 28.4 per cent of households
- Households experiencing rental stress, which make up 24.1 per cent of households living in private rental accommodation<sup>23</sup>
- Households in the lowest group for equivalised household income (\$0 to \$602 per week), which make up 23.2 per cent of households
- First nations people make up 0.7 per cent (628 persons) of the population in Hobsons Bay, the same proportion as for Greater Melbourne.
- Households living in Laverton, Altona North, Altona Meadows and Brooklyn, who are more likely to face social and financial disadvantage according to the Socio-Economic Indexes for Areas (SEIFA) Index of Relative Disadvantage.

<sup>20</sup> Unless otherwise noted, all data is sourced from the 2021 Census of Population and Housing - see .id informed decisions (n.d.) *Hobsons Bay City - Community Profile*, .id community demographic resources, <https://profile.id.com.au/hobsons-bay/service-age-groups>

<sup>21</sup> Estimate based on Australian Bureau of Statistics (2018) *Disability, Ageing and Carers, Australia: Summary of Findings*, <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings> - accessed February 2023.

<sup>22</sup> Jobs and Skills Australia, (n.d.) *Small Area Labour Markets*, <https://www.jobsandskills.gov.au/work/small-area-labour-markets> - accessed February 2023

<sup>23</sup> Housing id, (n.d.) *Hobsons Bay City Housing Monitor*, <https://housing.id.com.au/hobsons-bay> - accessed February 2023.

### 3.4. Land use considerations

Figure 1 displays the location of the nine gaming venues located in Hobsons Bay, including their spatial relationship to areas of socioeconomic disadvantage. Notably, two of the highest loss venues in Hobsons Bay (Millers Inn and Club Laverton) are in areas of relative socioeconomic disadvantage. There are a further five gaming venues within 2.5 kilometres of Hobsons Bay's municipal borders. Research has shown that people who use EGMs typically travel up to 2.5 kilometres to access a gaming venue.<sup>24</sup> Further detail on gaming venues in Hobsons Bay is provided in Appendix 11.3.

The positioning of venues in convenient locations can facilitate the likelihood of gambling harm. Historically, hotels and clubs with EGMs have been in or around activity centres or near local shopping areas. By increasing their visibility, these venues make it convenient to gamble not only for those who gamble occasionally, but also for those being harmed by gambling.

There are a range of other land use factors that contribute to the risk and experience of gambling harm. It is important to understand these factors to ensure they are considered when Council assesses any planning permit applications in relation to EGMs. Key factors include:

- **Location** - the location of gaming venues in convenient and accessible locations can increase the likelihood of people using EGMs and may contribute to the risk and experience of gambling harm. Key factors include current traffic, public transport and pedestrian routes; surrounding land uses; population likely to travel to the area; and existing EGM venues, non-gaming entertainment and other areas where people congregate.
- **Design and operation** – the design and operation of gaming venues and EGMs may contribute to the risk and experience of gambling harm. Key factors include visibility of EGMs from other parts of the venue, placement of EGMs near to toilets, bars and other amenities; lack of natural light; and the provision of inducements to gamble such as raffles, free tickets, cheaper alcohol and food, giveaways and awards/gifts.
- **Alternative entertainment** – people experiencing gambling harm often see EGMs as a social activity. In particular, clubs may become the main social outlet for people who are lonely or isolated in the community. A range of gambling and non-gambling entertainment options should be provided within local communities.

These (and other) factors are considered by Council when assessing planning permit applications against Clause 52.28 of the Hobsons Bay Planning Scheme (see Appendix 11.2). Additionally, a Social Impact Assessment must be submitted with any planning permit application to establish a new gaming venue, increase the number of EGMs at an existing venue, or transfer EGMs between two venues in Hobsons Bay.<sup>25</sup>

The Schedule to Clause 52.28 specifies shopping complexes and strip shopping centres where EGMs are prohibited. This list was most recently updated through Amendment C131

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<sup>24</sup> Centre for Gambling Research (2004). *Survey of gambling prevalence in Victoria*. ACT: Australian National University.

<sup>25</sup> Hobsons Bay City Council (2022) *Electronic Gaming Machines - Social Impact Assessment Guidelines*, <https://www.hobsonsbay.vic.gov.au/Council/Strategy-Planning/Social-policy-planning/Social-Impact-Assessment-Guidelines> - accessed March 2023.

(Updated Planning Scheme & New Residential Zones), which came into effect in February 2022. Through this Policy Statement, the list will be reviewed and updated to ensure it specifies all relevant locations where EGMs are prohibited (see Commitment 7.2.5). Consideration will be given to the activity centres identified in Council's Activity Centre Strategy which range from 'microcentres' (which typically comprise a few shops providing the simplest of convenience shopping and other needs) to 'Major Activity Centres' (which provide a wide range of goods and services).

The schedule also states that gaming venues and machines should be located outside areas that have been identified as Strategic Redevelopment Areas (SRAs). SRAs include precincts identified for rezoning through Council's Industrial Land Management (ILMS) Strategy 2008. The 2008 ILMS is currently undergoing a review and many former SRAs have been rezoned with new planning controls applied. This includes Precinct 15 which is controlled by the Altona North Comprehensive Development Plan (Schedule 2 to Clause 37.02). This Policy Statement aims to ensure that EGMs continue to be prohibited in these locations (former SRAs) as appropriate, and in line with the objectives set out in the Schedule to Clause 52.28 (see Appendix 11.2).

## 4. Roles and responsibilities

The responsibility for preventing harm from gambling is shared across all levels of government, and within several non-government organisations.

### 4.1. Commonwealth Government

The Commonwealth Government is responsible for regulating the provision and advertising of online gambling. The *Interactive Gambling Act 2001* establishes a framework for the provision and advertising of online (and telephone) gambling services in Australia.<sup>26</sup> The Act makes it illegal for gambling companies to offer some services in Australia, including online casinos, in-play sports betting, and betting on the outcome of a lottery.

In 2018, the Commonwealth Government released the National Consumer Protection Framework for Online Wagering. The Framework introduces a range of harm reduction measures for online gambling such as a voluntary pre-commitment system, prohibition on the promotion of payday lending and small loan providers on gambling websites and apps, and restrictions on the types of inducements that online gambling providers can offer.

In 2018, the Commonwealth Government also introduced the *Broadcasting Services (Online Content Service Provider Rules) 2018*, which banned gambling advertising during live sport that is streamed online between 5am and 8.30pm. These reforms brought online services in line with television and radio broadcasting systems. Despite these changes, the number of gambling ads continues to increase, with a 2022 survey finding that 71 per cent of respondents support a ban on gambling ads on television.<sup>27</sup> Most recently, the Commonwealth Government introduced changes to advertising regulations in late 2022,

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<sup>26</sup> Australian Communications and Media Authority (n.d.) *About the Interactive Gambling Act*, <https://www.acma.gov.au/about-interactive-gambling-act> – accessed February 2023.

<sup>27</sup> The Australia Institute (2022) 'Polling – Advertising on TV', <https://australiainstitute.org.au/post/polling-research-give-junk-food-gambling-ads-the-punt> – accessed February 2023.



which require online gambling companies to replace the 'gamble responsibly' messaging with a range of new taglines.

## 4.2. Victorian Government

The Victorian Government is responsible for the regulation of EGMs in Victoria. The *Gambling Regulation Act 2003* governs the operation of EGMs and other gambling products. The Act sets out the responsible Minister's authority to set the maximum allowable number of EGMs in the state (s.3.2.3); regional and municipal caps (s.3.2.4); responsible gambling measures (s.3.4.29-33a); taxes and levies; community benefit statements for club venues (s.3.6.9) and the community support fund for hotels (s.3.6.12).

Under the Act, hotels operating EGMs contribute 8.33 per cent of net gaming revenue to the Community Support Fund, with a total of \$147 million contributed in 2018-19.<sup>28</sup> The Community Support Fund provides ongoing operational funding to the Victorian Responsible Gambling Foundation (\$41 million in 2018-19) which is a statutory authority created by Victorian Parliament to prevent gambling harm.<sup>29</sup>

Club venues operating EGMs are required to provide community benefit to the value or 8.33 per cent of annual net gaming revenue. Each club is required to provide an audited community benefits statement in return for an 8.33 per cent discount on taxes related to the operation of EGMs. The Victorian Government also collects a 'Point of Consumption' tax (currently set at 8 per cent) of the net revenue derived from all online gambling customers located in Victoria.

The Victorian Government also oversees the land-use planning system in Victoria. The *Planning and Environment Act 1987* establishes the framework for planning the use, development and protection of land in Victoria. Clause 52.28 (Gaming) of the Hobsons Bay Planning Scheme sets out the statewide requirements to be considered in the assessment of planning permit applications in relation to EGMs. The Schedule to Clause 52.28 outlines further matters for consideration in the assessment of applications in Hobsons Bay, including location, venue design and application requirements (see Appendix 11.2).

The Victorian Government oversees the administration of the *Public Health and Wellbeing Act 2008*. Under the Act, the function of a Council is to 'seek to protect, improve and promote public health and wellbeing within the municipal district'. The Act requires Councils to prepare a municipal public health and wellbeing plan, which identifies goals and strategies for creating local communities where people can achieve maximum health and wellbeing. Council's current Municipal Public Health and Wellbeing Plan is incorporated into the Council Plan 2021-25.

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<sup>28</sup> Victorian Government (2019) *Community Support Fund Financial Overview 2018-19*, <https://www.dtf.vic.gov.au/community-support-fund/community-support-fund-financial-overview-2018-19> – accessed February 2023.

<sup>29</sup> Victorian Responsible Gambling Foundation (2022) *Our Annual Report 2021-22*, <https://responsiblegambling.vic.gov.au/about-us/annual-report>, accessed February 2023.

### 4.3. Local Government

Council can play various roles in seeking to prevent harm from gambling. Council will continue to work through the following roles in its efforts to prevent harm from gambling in Hobsons Bay:

- **Leadership and advocacy** – Council plays a key leadership role in promoting the health and wellbeing of our community. This extends to advocacy to the Commonwealth and Victorian Governments to introduce evidence-based harm prevention measures to protect local communities from gambling harm.
- **Planning and regulation** – Council can influence the location of EGMs in local communities through its role in assessing planning permit applications and initiating planning scheme amendments. This includes updating policies in the Hobsons Bay Planning Scheme and assessing applications for new gaming venues or additional EGMs in line with Social Impact Assessment Guidelines and the relevant provisions of the Hobsons Bay Planning Scheme.
- **Providing resources and facilities** – Council supports a wide range of local organisations by providing resources (such as grants and other funding) and facilities (such as community centres and sports grounds). These resources and facilities contribute to healthy communities and a range of alternatives to gambling activities and venues.
- **Research and data** – Council monitors data and supports local research to identify emerging trends and to inform its decision-making and advocacy. It can also promote key findings to continue to ‘change the narrative’ around gambling harm toward a public health approach.
- **Activities and promotion** – Council delivers a range of activities that provide alternatives to gambling, both online and through Council facilities. It also promotes other community activities, as well as Gamblers Help and other support services.

### 4.4. Other key stakeholders

There are several stakeholders that Council works with to prevent harm from gambling. For almost a decade, Council has been a Leadership Council with the Alliance for Gambling Reform, a national advocacy organisation with over 60 member organisations. The Alliance advocates to state and federal governments for reform of the gambling industry and to implement evidence-based and public health-focussed harm prevention measures.

As a member of the Victorian Local Governance Association (VLGA), Council also participates in the Local Government Working Group on Gambling, as a part of the VLGA's project on Building Capacity in Councils and Gambling. The Municipal Association of Victoria also has an interest in preventing gambling harm, which is addressed through its Alcohol, Drugs and Gambling forum.

Council also regularly engages with academics and research bodies, including members of Deakin University's Institute for Health Transformation and Monash University's School of Public Health and Preventative Medicine. These institutions are leading research on public health approaches to preventing gambling harm and have strict policies against taking funding from the gambling industry for their work.

The Victorian Responsible Gambling Foundation (VRGF) is a statutory authority that addresses gambling harm in Victoria. The VRGF funds support services such as Gamblers

Help programs, as well as preventative and educational programs such as [Libraries After Dark](#) and the [ReSPIN Program](#).

## 5. Preliminary Engagement

To inform the development of this Policy Statement, Council conducted a series of preliminary engagement activities, including workshops, interviews and an online community poll. Input was provided by service providers, local clubs and community organisations, academics, Gamblers Help services, advocacy bodies, residents, a local gaming venue, and people with lived experience of gambling harm.

The following key themes emerged from preliminary engagement activities:

- Concerns about the negative impact of gambling advertising and sponsorship in exposing children and other vulnerable groups to gambling products and venues.
- Highlighting that gambling harm occurs in the local community more than is known or discussed, and that the impact worsened during the COVID-19 pandemic.
- Highlighting that different forms of gambling have different levels of harm, but all contribute in some way to the 'normalisation' of gambling in community settings.
- Encouraging Council to use the levers available to reduce the number of EGMs in Hobsons Bay, as well as access and exposure to gambling products in community settings and on land and assets owned or managed by Council.
- Highlighting that clubs operating EGMs play a role in supporting local community groups, including through financial support for local sporting clubs. It was noted that this support often takes the form of donations (rather than sponsorships), as well as in-kind support such as meal vouchers and hosting club activities.
- Some community organisations expressed a desire to ensure their clubs engaged in ethical behaviour by not working with the gambling industry.
- Council's advocacy should focus on a range of key issues, including universal pre-commitment systems which require individuals to set time and spending limits, removing misleading EGM design features, and restricting gambling advertising and sponsorship.

Engagement participants consistently expressed the need to reduce exposure to gambling products and venues in community settings and urged Council to help create and promote alternative activities and facilities. Many participants also strongly believed that council had a role to lead the community in taking a stronger stance towards addressing the normalisation and promotion of gambling.

Below are excerpts from three responses to the community poll, which asked respondents the following question: *How has gambling affected you?* More than 90 per cent of respondents reporting that they had been negatively impacted by gambling.

***'[A family member] has gambled away all [their] life savings, twice. It's devastating seeing [them] change so much as [they] dive into depression afterwards, closing off from everyone. I feel so helpless as there is no way for me to stop [them] from doing it again.'*** (Aged 30-34, Male)

***'I feel very angry about the number of pokies venues in Hobsons Bay and how they prey on people. I do not believe that they contribute back into the community to the extent that they are required to.'*** (Aged, 55-59, Female)

***We would like Council to ban any Council owned and or run facility, including all Sports club from advertising, receiving sponsorship or donations from any gambling agency or any form of gambling revenues...Gambling has destroyed many individuals and families, so we urge Council to take a strong lead with our feedback to protect our Community from this pernicious and vile thing. (Aged 55-59, Male)***

## 6. Public health approach

### 6.1. Defining the issue

Through research and stories of lived experience, we know that gambling causes harm in local communities. Harm extends beyond financial losses, and is disproportionately distributed across the community, with vulnerable groups over-represented as regular users of various harmful gambling products.<sup>30</sup> Research also estimated the social cost of gambling in Victoria at \$7 billion in 2014-15, concluding that it is unlikely to deliver net benefits to the Victorian community.<sup>31</sup>

The Victorian and Commonwealth Governments set the direction for the regulation of gambling in Australia, including measures to prevent harm. Over many years, there has been a heavy reliance on changing individual behaviour to prevent harm, which is reinforced through the language of 'problem gamblers' and 'responsible gambling'. This approach focusses attention on the actions of individuals rather than the role of harmful gambling products. Moreover, the 'individual responsibility' approach has been ineffective in reducing harm, with EGM losses in Hobsons Bay now tending upwards, alongside recent increases in online gambling in Victoria.

This Policy Statement adopts a public health approach to addressing gambling harm by tackling the range of factors that impact on health beyond the individual level of lifestyle choice.<sup>32</sup> A similar public health approach has been used to prevent harm from tobacco in Australia, including plain packaging, health warnings on products, advertising bans, taxation, and banning smoking in public places.<sup>33</sup> There is a growing body of research to support public health approaches to preventing harm from gambling, with the Victorian Responsible Gambling Foundation, academics, health promotion professionals, and numerous Councils adopting this approach in recent years.

### 6.2. Determinants of gambling harm

A public health approach recognises that health and wellbeing is shaped by a range of factors which influence individual choices and behaviour. The following 'determinants' shape the level of risk and potential for gambling harm in local communities (see Figure 2):

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<sup>30</sup> Armstrong & Carroll (2017). Accessed March 2023.

<sup>31</sup> Browne et al (2017). Accessed March 2023.

<sup>32</sup> Victorian Responsible Gambling Foundation (2015) *Background Paper: Using a Public Health Approach in the Prevention of Gambling-related harm*, <https://responsiblegambling.vic.gov.au/documents/21/using-a-public-health-approach-in-the-prevention-of-gambling-related-harm.pdf> – accessed February 2023.

<sup>33</sup> Australian Government (n.d.) *Tobacco control*, <https://www.health.gov.au/topics/smoking-and-tobacco/tobacco-control> - accessed February 2023.



- **Socio-cultural factors** – these factors include who we are, where we live, the way we grew up, and the social settings and norms that impacts our behaviour, e.g. age, gender, cultural background, socioeconomic disadvantage.
- **Environmental factors** – these factors include the accessibility, availability and promotion of gambling products, services, settings and resources that impact our behaviour, e.g. location of gaming venues, ease of access to gambling products, normalisation of gambling in community settings.
- **Commercial factors** – these factors include the economic relationships and transactions between industry, government and local communities, e.g. revenue generated by EGMs for gaming venue operators and state government, advertising of gambling products and venues, financial losses from gambling products, and sponsorships of local clubs and major sporting codes.
- **Political factors** – these factors include the interactions between governments, government agencies, the gambling industry, local communities and other stakeholders that may impact decision making, e.g. legislative and regulatory frameworks, political donations, industry lobby groups, advocacy from local government.

Each of the commitments presented in this Policy Statement address one or more of these determinants of gambling harm (see Appendix 11.5). This alignment between policy commitments and the determinants of gambling harm ensures that Council's efforts remain grounded in a public health approach that is supported by data and research.

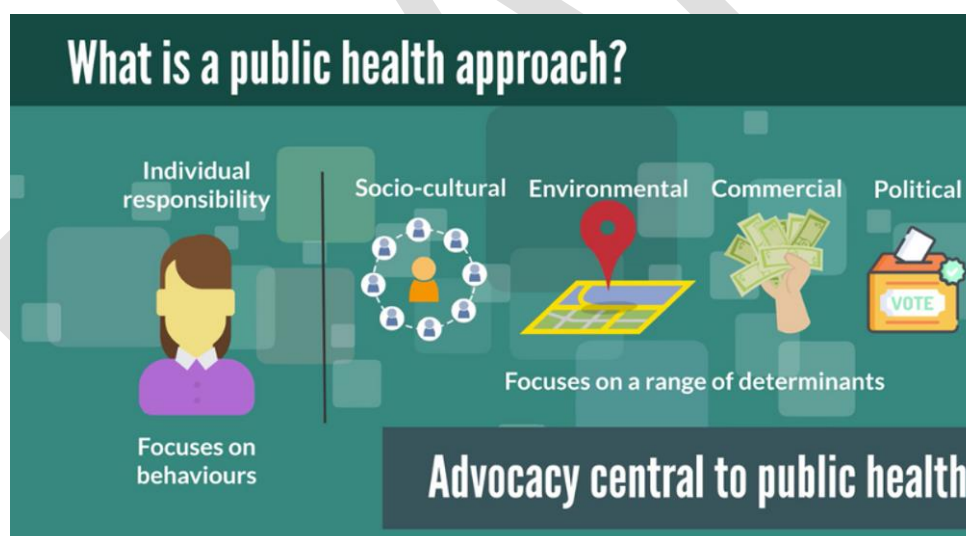


Figure 2: What is a public health approach? (Source: Institute for Health Transformation, Deakin University)

## 7. Priority areas

Council's Gambling Harm Prevention Policy Statement is built on six priority areas. This section outlines why Council is taking this approach and how it will aim to prevent harm from gambling through each priority area.

### 7.1. Advocacy

**Why is Council taking this approach?**

State and federal governments have the capacity to introduce harm prevention measures through legislation and regulation of EGMs and online gambling. However, regulation and legislation are typically based on individual responsibility approaches to harm prevention such as voluntary self-exclusion schemes.

Applying a public health approach, Council will advocate for evidence-based methods to prevent harm from EGMs and online gambling. These include removing harmful EGM design features, restricting gambling advertising and sponsorship, reducing opening hours of gaming venues, enforcing universal precommitment systems to set time and spending limits, and extending regulation to 'loot boxes'<sup>34</sup>, cryptocurrency and other potentially harmful products.

Council will advocate directly to state and federal governments, including by monitoring regulatory and legislative changes, participating in inquiries and publishing submissions. It will also work with its supporters and partners to support joint advocacy, media coverage and social media campaigns to call for more effective legislative protections and harm prevention measures to create safer environments for our residents.

### ***How will Council do this?***

*To prevent harm from gambling, Council will:*

- 7.1.1.      *Advocate to State and Federal Governments for regulatory and legislative reforms that prevent gambling harm in local communities.***
- 7.1.2.      *Support the Alliance for Gambling Reform, neighbouring Councils and other key partners to advocate for legislative and regulatory reform to protect local communities from gambling harm.***

## **7.2. Availability and accessibility of EGMs in Hobsons Bay**

### ***Why is Council taking this approach?***

We know that the availability and accessibility of EGMs in local communities contributes to the risk and experience of gambling harm. Locations with higher numbers of EGMs tend to experience higher losses. Additionally, increased exposure to EGMs in community settings normalises gambling in local communities, particularly for vulnerable groups such as children and young people.<sup>35</sup>

Through its land-use planning role, Council applies the relevant provisions of the Hobsons Bay Planning Scheme when assessing planning permit applications relating to EGMs,

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<sup>34</sup> Loot boxes involve 'microtransactions' that occur within online games that provide opportunities to acquire rewards, often purchased with real money. Research has identified that loot boxes apply the same psychological tactics that lead people to experience harm from EGMs – see Gallus, P. (2022) Unlocking loot boxes: gaming hype, or gambling-like?, <https://responsiblegambling.vic.gov.au/about-us/news-and-media/unlocking-loot-boxes-gaming-hype-or-gambling-like> - accessed March 2023.

<sup>35</sup> Bestman et al (2017).

including requiring the preparation of a Social Impact Assessment. Council may also oppose gaming licence<sup>36</sup> applications that do not demonstrate net community benefit.

Applying a public health approach, Council will monitor and (where possible and appropriate) take steps to limit the number and location of EGMs in local communities. At all times, Council will work within existing planning and regulatory frameworks and be guided the impact on the health and wellbeing of local communities.

### ***How will Council do this?***

*To prevent harm from gambling, Council will:*

- 7.2.1. Oppose any gaming licence application for new gaming venues or additional EGMs in Hobsons Bay that do not provide net community benefit (as measured by an independent Social and Economic Impact Assessment). When Council opposes an application, it will adequately resource the representation at the VGCCC and subsequent representation at VCAT hearings, if required.***
- 7.2.2. Consider making a submission on any gaming licence application for new gaming venues or additional EGMs in adjacent municipalities that are located within 2.5 kilometres of the municipal border.***
- 7.2.3. Explore opportunities to support gaming venues in Hobsons Bay who express an interest in reducing or removing their EGM entitlements.***
- 7.2.4. Make decisions and provide advice relating to EGMs in accordance with this Policy Statement and the relevant provisions of the Hobsons Bay Planning Scheme, including the Schedule to Clause 52.28 which requires applicants to provide a Social Impact Assessment and specifies locations where EGMs are prohibited.***
- 7.2.5. Update the relevant provisions of the Hobsons Bay Planning Scheme to ensure all existing and planned shopping complexes and shopping strips where new EGM venues are prohibited are listed and mapped, and to encourage any future growth to preferred locations away from activity centres, sensitive land uses, and socioeconomically disadvantaged communities.***
- 7.2.6. Request that any planning application seeking to extend the hours for a liquor licence at a gaming venue in Hobsons Bay include a Social Impact Assessment which considers the community impact of increased access to EGMs.***

## **7.3. Use of Council assets and facilities**

### ***Why is Council taking this approach?***

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<sup>36</sup> Under the *Gambling Regulation Act 2003*, any owner of premises seeking to either be approved as suitable for gaming, or a venue operator seeking to amend its licence to increase the number of EGMs in an approved venue, must apply to the Victorian Gaming and Casino Control Commission (VGCCC) for approval. Council has a total of 60 days from receiving the Commission's notification to make a submission, which should cover the economic and social impact of the proposed approval on surrounding Council districts. Further information is available at Victorian Gambling and Casino Control Commission (n.d.) *Hearings*, <https://www.vgccc.vic.gov.au/resources/hearings-and-decisions/hearings> - accessed February 2023.

Council assets and facilities play a key role in building healthy communities. Sporting facilities, libraries, and community centres are important community hubs that support health and wellbeing, especially for children, young people, and older people. Council manages lease and licensing agreements with community organisations for the use of land and facilities owned or managed by Council. These agreements are guided by the Hobsons Bay Property Strategy and Hobsons Bay Leasing and Licensing Policy.<sup>37</sup>

At the same time, the gambling industry sponsor sporting clubs and other groups in local communities, which can have the effect of promoting gambling products and venues. Research indicates that promotion contributes to the 'normalisation' of gambling products co-located within environments perceived as positive family settings.<sup>38</sup> Research has also shown that increased exposure to gambling products and venues increases the risk of harm for vulnerable groups such as children and older people.<sup>39</sup>

Applying a public health approach, Council will aim to create healthier community settings by limiting the promotion and availability of gambling venues and products within Council-owned or managed land and facilities.

### **How will Council do this?**

*To prevent harm from gambling, Council will:*

- 7.3.1.      *Include a clause prohibiting any increase to the number of EGMs when existing leases are renewed for Council owned or managed land or facilities where EGMs are operated. Should the number of EGMs be reduced over the life of the lease, no subsequent increases will be permitted.***
- 7.3.2.      *Not enter into any new leases or other legal agreements (beyond existing leases, as per 7.3.1) for the use of Council-owned or managed land or facilities which propose to operate electronic gaming machines.***
- 7.3.3.      *Discourage advertising of gaming venues or gambling products on land that is owned or managed by Council.***
- 7.3.4.      *Prevent access to gambling websites and explore options to block advertising from major online gambling companies on Council's information technology used by staff and the community.***

### **Exemptions**

- Commitment 7.3.3: Council-owned or managed land which incorporates a gaming venue.

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<sup>37</sup> The [Hobsons Bay Property Strategy 2021-30](#) aims to ensure that Council property delivers the highest possible public value, while the [Hobsons Bay Lease and Licensing Policy 2021-30](#) aims to ensure a consistent, fair and impartial approach to the allocation and occupation of Council owned or managed properties.

<sup>38</sup> Bestman, A., Thomas, S., Randle, M., Pitt, H., Cassidy, R. & Daube, M. (2019) 'Everyone knows grandma: Pathways to gambling venues in regional Australia', *Faculty of Business - Papers (Archive)*, <https://ro.uow.edu.au/buspapers/1675> - accessed February 2023.

<sup>39</sup> Thomas, S., Pitt, H., Randle, M., Balandin, S., Cowlshaw, S., McCarthy, S., Bestman, A. & Daube, M. (2020) *Factors that shape the gambling attitudes and behaviours of older adults in Victoria*, Victorian Responsible Gambling Foundation, Melbourne, accessed February 2023.

## 7.4. Access to Council resources

### ***Why is Council taking this approach?***

Council provides a range of services, facilities, activities, and other support for local communities. The introduction of 'rate capping', alongside increasing costs to deliver core activities, have placed additional (and ongoing) pressure on Council budgets.

At the same time, losses from EGMs and online gambling continue to increase, with just a small proportion coming back to directly benefit local communities.<sup>40</sup> Between 2018-19 and 2020-21, just over one per cent of the losses at Hobsons Bay's seven club EGM venues was returned to the community in the form of sponsorships, gifts and donations (see Appendix 11.4). Additionally, gambling industry sponsorship in community settings contributes to the normalisation of gambling through increased exposure to gambling products and venues.

Applying a public health approach, Council will not provide grants, funding and in-kind support (such as community transport) to activities and organisations that promote or derive income from gambling, instead prioritising those that deliver healthier outcomes for local communities. This will help to reduce community exposure to gambling products and venues, while also encouraging and supporting community groups to move away from sponsorship from the gambling industry.

### ***How will Council do this?***

*To prevent harm from gambling, Council will:*

- 7.4.1.     *Not provide Council grants or funding to organisations that promote or derive income from gambling.***
- 7.4.2.     *Not provide Council grants or in-kind support to activities that promote gambling or are held in gaming venues.***
- 7.4.3.     *Not provide Council grants to organisations or activities that receive sponsorships from gaming venues, online betting companies or other gambling providers.***
- 7.4.4.     *Explore opportunities to consider tenderers' relationship with the gambling industry as an 'assessable criteria' for relevant public tenders offered by Council.***
- 7.4.5.     *Regularly update rates valuations for all gaming venues in Hobsons Bay.***

### ***Exemptions***

- Commitment 7.4.1: Capital grants funding or co-funding (e.g. matching Victorian Government funding) used to deliver new or upgraded Council-owned infrastructure or equipment; operational servicing (e.g. maintenance, repairs) of land or facilities that are owned or managed by Council.
- Commitment 7.4.2: ANZAC Day and Remembrance Day activities supported by Council; raffles, bingo and tipping competitions arranged by community groups for the purposes of raising funds.

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<sup>40</sup> Francis, L. & Livingstone, C. (2020) 'Gambling's community contributions: does the community benefit?', *Addiction Research & Theory*, 28:5, 365-378, DOI: [10.1080/16066359.2019.1663834](https://doi.org/10.1080/16066359.2019.1663834), accessed February 2023.



### **Transition period**

- Commitment 7.4.1: this commitment will come into effect from 1 July 2025.
- Commitment 7.4.3: this commitment will come into effect from 1 July 2025 (or later for existing long-term contractual arrangements, as required).

## **7.5. Prevention and Support**

### ***Why is Council taking this approach?***

Research indicates that increased exposure to gambling products increases the risk and experience of harm from gambling.<sup>41</sup> Prevention programs and support programs play an important role in raising awareness, providing alternative activities, and assisting the recovery of people and families impacted by gambling harm.

Over many years, local gaming venues have come to play a key role in local communities, particularly venues operated by community clubs. These organisations have long-standing local connections, and have broadened their appeal through the provision of affordable and accessible social activities, meals and meeting spaces. However, the presence of gambling products in these settings further normalises the links between gambling and social interactions, particularly in neighbourhoods with limited alternative activities and venues.

Council can play a key role through its capacity to deliver and promote activities, programs and services. Applying a public health approach, Council will support access to available prevention programs and services, including for people of different genders, ages and cultural backgrounds. It will also aim to limit exposure to gambling venues and products and deliver and promote alternative venues and activities.

### ***How will Council do this?***

*To prevent harm from gambling, Council will:*

- 7.5.1. Support and promote gambling support services and programs in local communities.**
- 7.5.2. Deliver and promote activities that provide alternatives to gambling and gaming venues.**
- 7.5.3. Establish partnerships and/or seek external funding to deliver and support activities and programs to prevent harm from gambling.**
- 7.5.4. Not hold council events, activities or programs in gaming venues unless the venue offers a specific setting that is required, and no alternative is available**

## **7.6. Research and awareness**

### ***Why is Council taking this approach?***

Community awareness of the causes and impacts of gambling harm are typically understood through an 'individual responsibility' lens, reinforced through gambling advertising and media coverage. Terms such as 'responsible gambling' and 'problem

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<sup>41</sup> Thomas et al (2020), accessed March 2023.

gambling' are commonplace but tend to stigmatise people with lived experience of gambling harm and do little to prevent harm.<sup>42</sup>

A public health approach aims to re-frame the determinants and impacts of gambling harm, drawing attention to sociocultural, environmental, commercial and political factors. Clear language and stories of lived experience play a key role in this process, alongside locally-informed research and balanced analysis of available data on gambling activity and products.

Council can play a key role through its capacity to monitor research and data and presenting this to local communities, including by highlighting the varying risks and impacts for people of different ages and genders. Applying a public health approach, Council aims to re-frame narratives around gambling harm towards underlying causes and impacts and away from perspectives that rely exclusively on the language of 'individual responsibility'.

### **How will Council do this?**

*To prevent harm from gambling, Council will:*

- 7.6.1.      *Change the narrative around gambling harm by raising awareness of its causes and impacts in local communities to staff and the broader Hobsons Bay community.***
- 7.6.2.      *Monitor and promote research and data relating to the impact of gambling products and venues in local communities, including expenditure on EGMs and online gambling, Community Benefits Statements, and community attitudes towards gambling.***
- 7.6.3.      *Support research (excluding projects funded by the gambling industry) into the impacts of gambling in local communities.***

## **8. Transition periods**

Council recognises that some aspects of this Policy Statement will require measured and balanced implementation to identify and mitigate any potential impacts on local communities. Additionally, preliminary engagement highlighted that some of the commitments will need to be implemented over time to support residents, community groups and other organisations to adjust to new arrangements.

Therefore, Council will apply transition periods to facilitate some of these changes. Over this time, Council will inform any impacted groups and provide support to adjust to Council's new policy settings. As highlighted in the Priority Areas, the following policy commitments will come into full effect from 1 July 2025:

- *7.4.1 – Council will not provide Council grants or funding to organisations that promote or derive income from gambling.*
- *7.4.3 – Council will not provide Council grants to organisations or activities that receive sponsorships from gaming venues, online betting companies or other gambling providers.*

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<sup>42</sup> Marko S., Thomas S., Pitt H. and Daube M. (2023) 'The impact of responsible gambling framing on people with lived experience of gambling harm', *Frontiers in Sociology* 8:1074773. doi: 10.3389/fsoc.2023.1074773, accessed March 2023.

## 9. Implementation and monitoring

This Policy Statement will guide Council's ongoing efforts to prevent harm from gambling in Hobsons Bay. It complements Council's other plans, policies and strategies, including the Council Plan 2021-25 (incorporating the Municipal Public Health and Wellbeing Plan), Hobsons Bay 2030 Community Vision, Hobsons Bay Property Strategy 2021-30, Hobsons Bay Leasing and Licensing Policy 2021-30, and A Fair Hobsons Bay for All 2019-23.

An internal implementation plan will outline key actions, which will be informed by available resources, current priorities, and emerging issues and opportunities. Where additional resources are required, these will be subject to Council's annual budget processes and/or external funding opportunities.

Progress will be monitored and reported via Council's existing processes, which may include the Annual Report and/or other public reporting methods. The implementation plan may also be reviewed and updated as actions are completed and/or new priorities arise.

The Policy Statement will be reviewed within five years from the date of Council adoption (or earlier, if required) to ensure it takes account of contemporary policy and funding contexts and relevant Council plans, policies and strategies. The internal implementation plan will continue to guide operational activities until any future updated Policy Statement is endorsed by Council.

## 10. Response to legislative requirements

### 10.1. Gender Equality Act 2020

As per the requirements of the *Gender Equality Act 2020*, Council is required to prepare a Gender Impact Assessment (GIA) for all new and updated programs, policies and services that have a direct and significant public impact. GIAs help us to think critically about how policies, programs and services will meet the different needs of women, men and gender diverse people.

#### **Research and Findings**

Gambling harm is known to impact people of all genders, both directly (as the affected individual) and through family members or friends (as an affected other). In developing this Policy Statement, research was undertaken to better understand the key issues for people of different genders and who is most at risk of being harmed by gambling in Hobsons Bay.

- **Family Violence** – There is a link between gambling harm and family violence. Research indicates that, while gambling does not directly cause intimate partner violence, it reinforces the gendered drivers of violence to intensify the frequency and severity of intimate partner violence against women.<sup>43</sup> Research also highlights the prevalence of economic abuse of women experiencing gambling-related intimate partner violence. Additionally, it identifies that gaming venues serve as safe spaces for women, and that in many areas there are few alternatives.

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<sup>43</sup> Hing, N., O'Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., & Rawat, V. (2020) *The relationship between gambling and intimate partner violence against women* (Research report, 21/2020). Sydney: ANROWS - accessed March 2023



- **Men** - Men are significantly more likely to experience harm from their own gambling than women (1% per cent of men vs. 0.5 per cent of women experience significant harm from gambling).<sup>44</sup> More severe gambling harm is particularly prevalent in young men (25-44 years old).<sup>45</sup> However, it should also be noted that men play a more prominent role in organisations that derive income from gambling. For example, an analysis of 'approved associates' for gaming venues in Hobsons Bay (typically board/committee members or management staff) showed that around 70 per cent were male.<sup>46</sup>
- **First Nations people** – A 2014 study found that Indigenous men experience gambling harm more than Indigenous Women.<sup>47</sup>
- **Income** - Data from the 2021 Census shows that 53 per cent of women in Hobsons Bay are in the two lower income quartiles for equivalised individual weekly income (\$0-399; \$400-799), compared to 38 per cent of men.<sup>48</sup> This vulnerability increases the risk of harm.<sup>49</sup>
- **Homelessness** – Older women are one of the fastest growing groups experiencing homelessness in Australia. Between 2011 and 2016, the number of women aged 55 years and above experiencing homelessness grew from 5,234 to 6,866, a 31 per cent increase.<sup>50</sup> Additionally, in 2019-20, 62 per cent of the specialist homelessness service clients in Hobsons Bay were female.<sup>51</sup>

## Recommendations

Based on the research and findings outlined above, the following recommendations have been implemented in the development of this Policy Statement:

1. *A broad 'gender lens' has been applied to seek and consider the experience, knowledge and lived experience of women, men, and gender diverse people.*
2. *Community and stakeholder engagement has sought input from people of different genders, as well as service providers that interact with a range of groups at risk of gambling harm.*
3. *Commitments included in the updated Policy Statement take account of people of different genders, and implementation will include targeted actions where required.*

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<sup>44</sup> Rockloff, M., Browne, M., Hing, N., Thorne, H., Russell, A., Greer, N., Tran, K., Brook, K. & Sproston, K. (2020) *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne - accessed February 2023

<sup>45</sup> Ibid.

<sup>46</sup> Victorian Gambling and Casino Control Commission, (n.d) *Licence Information*, <https://www.vgccc.vic.gov.au/resources/information-and-data/licence-information> - accessed March 2023.

<sup>47</sup> Hing, N., Breen, H., Gordon, A., & Russell, A. (2014) 'Gambling among Indigenous men and problem gambling risk factors: An Australian study', *International Journal of Mental Health and Addiction*, accessed March 2023

<sup>48</sup> .id informed decisions (n.d.) *Hobsons Bay City - Community Profile*, .id community demographic resources, <https://profile.id.com.au/hobsons-bay/service-age-groups> - accessed February 2023.

<sup>49</sup> Rockloff, M. et al (2020) - accessed February 2023

<sup>50</sup> Australian Bureau of Statistics (2018) *Census of Population and Housing: Estimating homelessness 2016*, Cat. No. 2049.0

<sup>51</sup> Australian Institute of Health and Welfare (2020) *Specialist homelessness services annual report 2019-20*, AIHW, Australian Government, accessed February 2023.

# 11. Appendices

## 11.1. Definitions

The following terms are used in this Policy Statement as defined below:

- **Council funding** – allocations made directly to organisations through Council's annual budget process. For the purposes of Commitment 7.4.1 of this Policy Statement, this does not include Capital Works funding or co-funding, i.e. allocations for new or upgraded Council-owned facilities such as buildings and pavilions
- **Council grant** – non-recurrent funding provided through a grants program administered by Council.
- **Donations** – funding provided to one organisation or group from another as an act of 'goodwill.' In the context of the gambling industry, this is often for the purposes of community benefit to offset the negative impacts of gambling.
- **Electronic Gaming Machine (EGM)** – the *Gambling Regulation Act 2003* defines an electronic gaming machine as 'any device, whether wholly or partly mechanically or electronically operated for the purpose of playing a game of chance or a game of mixed chance and skill'.<sup>52</sup> EGMs are commonly known as 'poker machines' or 'pokies.'
- **Gambling** - the Victorian Responsible Gambling Foundation states that gambling (also known as betting) 'requires a player to risk losing something of value (usually money) for the chance of winning more. Gambling outcomes may depend on correctly predicting an uncertain outcome (such as a particular horse coming first in a race) or luck (such as a winning combination of symbols on a pokie machine).'<sup>53</sup>
- **Gambling harm** – research commissioned by the Victorian Responsible Gambling Foundation found that '[g]ambling related harm can be divided into seven key areas: Financial harm, relationship disruption, emotional or psychological distress, decrements to health, cultural harm, reduced work or study performance, and criminal activity. These harms can further be considered as general harms (which occur at any time), crisis harms, which are associated with attempts to seek help, and legacy harms, which occur long after gambling has ceased.'<sup>54</sup>
- **Gambling industry** – the gambling industry includes (but is not limited to) organisations that derive income from gambling products and activities, including gaming venues, gaming venue operators, and online gambling companies. This definition extends to peak organisations and industry groups that aim to advance their interests.
- **Gaming Venue** - an establishment where licensed EGMs are present and operational.

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<sup>52</sup> Victorian Government (2003) *Gambling Regulation Act 2003*, Version 97 (effective 10 March 2023), <https://www.legislation.vic.gov.au/in-force/acts/gambling-regulation-act-2003/087>, accessed February 2023.

<sup>53</sup> Victorian Responsible Gambling Foundation (n.d.) *Glossary*, <https://responsiblegambling.vic.gov.au/resources/glossary>, accessed February 2023.

<sup>54</sup> *ibid.*

- **Gaming Venue Operator** – an entity (such as a company or club) holding a venue operator licence enabling it to operate EGMs in Victoria.
- **Lease** - an agreement that grants a tenant exclusive possession of Council property for a specified period of time, subject to certain terms and conditions and creates an interest in land that is binding on third parties which is capable of being assigned.
- **Lessee** - a person (or other entity) who is granted a lease.
- **License** - an agreement that grants non-exclusive use of Council land/property for a specific period and subject to certain terms and conditions; it does not create any estate or interest in or over the licensed premises.
- **Licensee** - a person (or other entity) who is granted a license.
- **Loot boxes** – loot boxes involve ‘microtransactions’ that occur within online games that provide opportunities to acquire rewards, often purchased with real money. Research has identified that loot boxes apply the same psychological tactics that lead people to experience harm from EGMs.
- **Online Gambling** – online gambling refers to websites and products that allow gambling activities to be conducted on the internet using technology such as computers or mobile phones. Typically, users gamble on sporting or racing activities, but there is an increasing range of options available, including elections and reality television.
- **Social and Economic Impact Assessment** – a Social and Economic Impact Assessment (SEIA) aims to identify the extent to which a gaming licence application (typically for additional EGMs) will affect the wellbeing of local communities. Councils may commission an independent SEIA to inform its decision as to whether to oppose any gaming licence application within its municipal borders. In practice, there are many similarities between a SEIA and a Social Impact Assessment (see below).
- **Social Impact Assessment** – a Social Impact Assessment (SIA) aims to identify the extent to which a planning application relating to EGMs will affect community health and wellbeing (including amongst disadvantaged groups) and whether it will provide a benefit or cost to the Hobsons Bay community. In 2022, Council adopted new SIA Guidelines that will be applied to any future planning approval processes. In practice, there are many similarities between a SIA and a Social and Economic Impact Assessment (see above).
- **Sponsorship** - funding provided to one organisation from another in return for public advertising or promotion. Sponsorship typically includes the display of the sponsor’s name and/or logo on physical materials (e.g. signage, clothing, written materials) or online content (e.g. website, social media).

## 11.2. Schedule to Clause 52.28 Gaming

### 1.0 Objectives

To ensure that the social and economic impact of the Electronic gaming machine (EGM) is not detrimental to the wellbeing of the community.

To ensure that EGM venues are located, designed and operated in a manner that minimises opportunities for convenience gambling.

To locate EGMs away from disadvantaged areas or vulnerable communities.

To ensure gaming is not the primary use within a venue.

To ensure proposals for gaming premises deliver a net community benefit in Hobsons Bay.

### 2.0 Prohibition of a gaming machine in a shopping complex

Installation or use of a gaming machine as specified in Clause 52.28-4 is prohibited on land described in Table 1 below.

Table 1	
Name of shopping complex and locality	Land description
Central Square, Altona Meadows	Land on the southwest corner of Central Avenue and Merton Street, also known as 1-23 Central Avenue, Altona Meadows
Altona Gate, Altona North	Land on the northwest corner of Beuron Road and Millers Road, also known as 124-134 Millers Road, Altona North including 84-122 Millers Road, Altona North

### 3.0 Prohibition of a gaming machine in a strip shopping centre

A gaming machine as specified in Clause 52.28-5 is prohibited in a strip shopping centre specified in Table 2 below.

Table 2	
Name of strip shopping centre and locality	Land description
Aviation Road, Laverton	1-9 (odd numbers) and 2-28 (even numbers) Aviation Rd; 161-163 (odd numbers) Railway Ave; 2-8 (even numbers) Neville Ave
Borrack Square, Altona North	1-39 (odd numbers) and 2-40 (even numbers) Borrack Square; 202-204 (even numbers) Millers Rd
Challis Street, Newport	31-47 (odd numbers) and 44-56 (even numbers) Challis St
Douglas Parade/Ferguson Street, Williamstown	2-102 (even numbers) and 7-97 (odd numbers) (including land at the rear of 87) Ferguson St; 1-111 (odd numbers) and 4-110 (even numbers) (including land at the rear of 32-36 (even numbers)) Douglas Pde; 32-36 (even numbers) Lyons St; 101 Napier St; 4-10 (even numbers) Roaches Terrace; 64-68 (even numbers) and 77-83 (odd numbers) Stevedore St; land at the rear of 85 Stevedore St; 72-74 (even numbers) Electra St; 1-17 (odd numbers) and 2-14 (even numbers) Cox's Garden; 2-16 (even numbers) and 15-27 (odd numbers) (including land at the rear of 27) Wellington St; 166-168 (even numbers) Aitken St
Harrington Square, Altona	1-31 Harrington Square; 116-188 Maidstone St
Hudsons Road, Spotswood	29 Hope St; 68-98 (even numbers) and 79-101, 139, 145A and 145B (odd numbers) (excluding the rear of 87-97 (odd numbers)) Hudsons Rd and 606-612 Melbourne Rd
Millers Junction, Altona North	24-42 Cabot Drive and 290-298 Millers Road

Newport Junction, Newport	1-5 (odd numbers), 2-26 (even numbers) and 17-33A (odd numbers) Mason St; 33-37 (odd numbers); 1 Susman St; 1-46A Hall St (excluding land at the rear of 15 Hall St); 314-344 (even numbers) and 405-455 (odd numbers) Melbourne Rd; 1 Walker St
Pier Street, Altona	18-122 (even numbers) (including the 3 lots at the rear of 122) and 39-121 (odd numbers) Pier St; 9 and 19 Bent St; 112-122 (even numbers) Queen St; 66-92 (even numbers) Railway St Sth; 137 and 153 The Esplanade
Somers Parade, Altona	45 Maidstone St and 3-31 (odd numbers) Somers Parade
The Circle, Altona North	9-13 (odd numbers) and 25-75 (odd numbers) The Circle
The Range, Williamstown North	71-79 (odd numbers) Kororoit Creek Rd
Woods Street, Laverton	44-68 (even numbers) Woods St; 2-18 (even numbers) Lohse St; 36-38 (even numbers) Maher St
Vernon Street, South Kingsville	15-41 (odd numbers) and 30-36 (even numbers) Vernon St

#### **4.0 Locations for gaming machines**

Gaming venues and machines should be located:

- On sites that minimise the likelihood of people passing the venue in the course of their usual business or everyday activities.
- Outside areas that are either:
  - Of relative socio-economic disadvantage. Socio-economic disadvantage is defined as households in the bottom two deciles (lowest 20 per cent) of the SEIFA (Socio-Economic Indexes for Areas) index of relative disadvantage, based on the Australian Bureau of Statistics, Statistical Area Level 1 (SA1) which is the smallest unit of Census data.
  - Identified as Strategic Redevelopment Areas in the Strategic Framework Plan at Clause 02.04.

#### **5.0 Venues for gaming machines**

Gaming machines should be located:

- In venues that:
  - Provide a range of social, leisure and recreational activities, with gaming being only a component of these activities.
  - Physically and visually separate the venue's gaming activities from its non-gaming activities.
- Where the design and operating hours will not detrimentally affect the amenity of the surrounding area.
- Outside of venues where:
  - The gaming floor area is more than 25 percent of the total floor area.
  - It may cause adverse amenity impacts on the adjoining land uses as a result of operating hours, traffic, noise, car parking and safety.

#### **6.0 Application requirements**

The following application requirements apply to an application for a permit under Clause 52.28, in addition to those specified elsewhere in the scheme and must accompany an application, as appropriate, to the satisfaction of the responsible authority:

- Detailed plans of the design and layout of the venue (including the location of all existing and proposed EGMs).

- Details of the venue's existing and proposed hours of operation.
- A Social Impact Assessment prepared by a suitably qualified person, as per Council's Social Impact Assessment Guidelines (Hobsons Bay City Council, March 2011), including:
  - Details and analysis of the venue's projected patron catchment and its socio-economic profile.
  - If it is proposed to move EGMs from one part of the municipality to another, details of the relative social and economic differences between the two areas. An explanation as to why the EGMs are being transferred is to be provided.
  - Characteristics of the local area including the location of and distance to shopping complexes and strip shopping centres, community facilities, public housing, counselling services and public transport.
- Details of existing and proposed gambling and non-gambling related entertainment and recreation facilities and activities at the venue and within one kilometre of the venue.
- Details of existing and proposed distribution and density of EGMs in the municipality and its neighbourhoods.
- Details of existing gaming expenditure at the venue over a three year period prior to the application (if relevant).
- If EGMs are to be relocated from other venues, and as a result, gaming expenditure is likely to be transferred from other venues:
  - Particulars as to how the level of expenditure transfer has been calculated (including, but not limited to, comparison of per machine expenditure at the venue prior to, and anticipated expenditure after, the installation of additional machines).
  - The resulting impacts on the venue from where the expenditure is transferred.
- Details of the nature and extent of community benefits expected from the proposal and how the benefits are to be secured for and distributed across the local community.
- Assessment of key social and economic issues and overall net community impact.
- Measures to mitigate any negative social and economic impacts from EGMs.

### **7.0 Decision guidelines**

The following decision guidelines apply to an application for a permit under Clause 52.28, in addition to those specified in Clause 52.28 and elsewhere in the scheme which must be considered, as appropriate, by the responsible authority:

- Whether the proposal will result in a net social and economic benefit, aside from any community contribution scheme.
- Whether the proposal increases EGM densities in the area and how that increase affects the local community and compares with the metropolitan Melbourne average.
- Whether the proposal will result in EGMs clustering in the area and whether this is likely to increase the social disadvantage of the area.
- Whether the venue offers a range of non-gambling entertainment and recreation options.
- Whether the location, design and operation of the venue will facilitate convenience gambling.
- Whether the proposal will impact on the amenity of the area and surrounding land uses.

### 11.3. EGM venues in Hobsons Bay

No.	Venue	Operator	Type	2019-20 (open 266 days)			2020-21 (open 207 days)			2021-22 (open 269 days)		
				EGMs	Total (\$)	Daily (\$)	EGMs	Total (\$)	Daily (\$)	EGMs	Total (\$)	Daily (\$)
1	<b>Millers Inn Hotel</b>	ALH Group Pty. Ltd.	Hotel	70	10,036,521	37,731	70	6,459,931	31,207	70	9,892,214	36,774
2	<b>Seagulls Nest</b>	Williamstown Football Club	Club	66	5,405,309	20,321	66	4,378,237	21,151	66	5,501,175	20,450
3	<b>Club Laverton</b>	Carlton Football Club Ltd.	Club	60	4,744,242	17,835	60	4,062,027	19,623	60	5,359,666	19,924
4	<b>Altona Sports Club</b>	Altona Sports Club Inc.	Club	83	3,268,206	12,286	83	2,298,352	11,103	83	3,160,764	11,750
5	<b>Koorringal Golf Club</b>	Koorringal Golf Club	Club	61	2,953,728	11,104	61	2,607,682	12,597	61	3,080,997	11,454
6	<b>Altona RSL</b>	Altona RSL Sub-Branch Inc.	Club	50	2,470,289	9,287	58	1,989,539	9,611	58	2,703,998	10,052
7	<b>The Vic Inn</b>	Carlton Football Club Ltd.	Club	60	2,380,470	8,949	60	1,800,009	8,696	60	2,637,488	9,805
8	<b>Rifle Club Hotel</b>	ALH Group Pty. Ltd.	Hotel	39	1,982,642	7,454	40	1,420,893	6,864	40	1,393,267	5,179
9	<b>Altona Bowling Club</b>	Altona Bowling Club Inc.	Club	37	1,370,252	5,151	37	873,140	4,218	37	1,100,281	4,090
	<b>Totals</b>			<b>526</b>	<b>34,611,659</b>	<b>130,119</b>	<b>535</b>	<b>25,889,811</b>	<b>125,072</b>	<b>535</b>	<b>34,829,849</b>	<b>129,479</b>

## 11.4. Summary of Community Benefits Statements

	2018-19		2019-20		2020-21	
	Total (\$)	% of Losses	Total (\$)	% of Losses	Total (\$)	% of Losses
<b>Class A: Direct community benefits</b>						
(a) Donations, gifts and sponsorships (including cash, goods and services)	327,113	1.06%	245,552	1.09%	182,769	1.01%
(b) Cost of providing and maintaining sporting activities for use by club members	793,474	2.56%	596,597	2.64%	591,908	3.29%
(c) Cost of any subsidy for the provision of goods and services but excluding alcohol	364,809	1.18%	342,093	1.51%	197,390	1.10%
(d) Voluntary Services provided by members and/or staff of the club to another person in the community	86,070	0.28%	48,040	0.21%	32,610	0.18%
(e) Advice, support and services provided by the RSL to ex-service personnel, their carers and families	11,047	0.04%	8,525	0.04%	9,593	0.05%
<b>Sub-Total (Class A)</b>	<b>1,582,513</b>	<b>5.11%</b>	<b>1,240,807</b>	<b>5.49%</b>	<b>1,014,270</b>	<b>5.63%</b>
<b>Class B: Indirect community benefits</b>						
(a) Capital expenditure	210,555	0.68%	23,271	0.10%	123,422	0.69%
(b) Financing Costs (including principal and interest)	0	0.00%	65,756	0.29%	94,425	0.52%
(c) Retained earnings accumulated during the year	0	0.00%	0	0.00%	0	0.00%
(d) Provision of buildings, plant and equipment over \$10,000 per item <sup>55</sup>	0	0.00%	115,620	0.51%	22,028	0.12%
(e) Operating costs, e.g. wages, electricity, rates	6,354,150	20.53%	6,184,065	27.37%	5,635,972	31.30%
<b>Sub-Total (Class B)</b>	<b>6,564,705</b>	<b>21.21%</b>	<b>6,388,712</b>	<b>28.28%</b>	<b>5,875,847</b>	<b>32.63%</b>
<b>Class C: Miscellaneous</b>						
(a) Provision of responsible gambling measures and activities but excluding those required by law	0	0.00%	0	0.00%	0	0.00%
(b) Reimbursement of expenses reasonably incurred by volunteers	1,310	0.00%	823	0.00%	0	0.00%
(c) Community Benefits Statement preparation and auditing expenses	9,415	0.03%	6,465	0.03%	6,492	0.04%
<b>Sub-Total (Class C)</b>	<b>10,725</b>	<b>0.03%</b>	<b>7,288</b>	<b>0.03%</b>	<b>6,492</b>	<b>0.04%</b>
<b>Total (Class A + Class B + Class C)</b>	<b>8,157,943</b>	<b>26.35%</b>	<b>7,636,807</b>	<b>33.80%</b>	<b>6,896,609</b>	<b>38.30%</b>
<b>EGM Losses (Clubs only)</b>	<b>30,957,590</b>		<b>22,592,496</b>		<b>18,008,987</b>	

<sup>55</sup> Excluding gaming equipment or the gaming machine area of the venue.



## 11.5. Mapping commitments against determinants of gambling harm

No.	Commitment	Determinant of gambling harm
7.1.1	Advocate to State and Federal Governments for regulatory and legislative reforms that prevent gambling harm in local communities.	Political, Commercial
7.1.2	Support the Alliance for Gambling Reform, neighbouring Councils and other key partners to advocate for legislative and regulatory reform to protect local communities from gambling harm.	Political, Commercial, Socio-cultural
7.2.1	Oppose any gaming licence application for new gaming venues or additional EGMs in Hobsons Bay that do not provide net community benefit (as measured by an independent Social and Economic Impact Assessment). When Council opposes an application, it will adequately resource the representation at the VGCCC and subsequent representation at VCAT hearings, if required.	Environmental, Socio-cultural, Commercial
7.2.2	Consider making a submission on any gaming licence application for new gaming venues or additional EGMs in adjacent municipalities that are located within 2.5 kilometres of the municipal border.	Environmental, Socio-cultural, Commercial
7.2.3	Explore opportunities to support gaming venues in Hobsons Bay who express an interest in reducing or removing their EGM entitlements.	Commercial, Environmental, Socio-cultural
7.2.4	Make decisions and provide advice relating to EGMs in accordance with this Policy Statement and the relevant provisions of the Hobsons Bay Planning Scheme, including the Schedule to Clause 52.28 which requires applicants to provide a Social Impact Assessment and specifies locations where EGMs are prohibited.	Environmental, Socio-cultural, Commercial
7.2.5	Update the relevant provisions of the Hobsons Bay Planning Scheme to ensure all existing and planned shopping complexes and shopping strips where new EGM venues are prohibited are listed and mapped, and encourage any future growth to preferred locations away from activity centres, sensitive land uses, and socioeconomically disadvantaged communities.	Environmental, Socio-cultural, Commercial
7.2.6	Request that any planning application seeking to extend the hours for a liquor licence at a gaming venue in Hobsons Bay include a Social Impact Assessment which considers the community impact of increased access to EGMs.	Environmental, Socio-cultural, Commercial
7.3.1	Include a clause prohibiting any increase to the existing number of EGMs when leases for Council owned or managed land or facilities are due for renewal where EGMs are operated. Should the number of EGMs be reduced over the life of the lease, no subsequent increases will be permitted.	Commercial, Environmental, Socio-cultural
7.3.2	Not enter into any new leases or other legal agreements for the use of Council-owned or managed land or facilities which propose to operate electronic gaming machines.	Commercial, Environmental, Socio-cultural
7.3.3	Discourage advertising of gaming venues or gambling products on land that is owned or managed by Council.	Commercial, Environmental, Socio-cultural
7.3.4	Prevent access to gambling websites and explore options to block advertising from major online gambling companies on Council's information technology used by staff and the community.	Environmental, Socio-cultural, Commercial

7.4.1	Not provide Council grants or funding to organisations that promote or derive income from gambling.	Commercial, Environmental, Socio-cultural
7.4.2	Not provide Council grants or in-kind support to activities that promote gambling or are held in gaming venues.	Environmental, Socio-cultural, Commercial
7.4.3	Not provide Council grants to organisations or activities that receive sponsorships from gaming venues, online betting companies or other gambling providers.	Environmental, Socio-cultural, Commercial
7.4.4	Explore opportunities to consider tenderers' relationship with the gambling industry as an 'assessable criteria' for relevant public tenders offered by Council.	Commercial, Environmental
7.4.5	Regularly update rates valuations for all gaming venues in Hobsons Bay.	Commercial, Environmental
7.5.1	Support and promote gambling support services and programs in local communities.	Environmental, Socio-cultural
7.5.2	Deliver and promote activities that provide alternatives to gambling and gaming venues.	Environmental, Socio-cultural
7.5.3	Establish partnerships and/or seek external funding to deliver and support activities and programs to prevent harm from gambling.	Environmental, Socio-cultural
7.5.4	Not hold council events, activities or programs in gaming venues unless the venue offers a specific setting that is required, and no alternative is available.	Environmental, Socio-cultural, Commercial
7.6.1	Change the narrative around gambling harm by raising awareness of its causes and impacts in local communities to staff and the broader Hobsons Bay community.	Political, Environmental, Socio-cultural
7.6.2	Monitor and promote research and data relating to the impact of gambling products and venues in local communities, including expenditure on EGMs and online gambling, Community Benefits Statements, and community attitudes towards gambling.	Political, Environmental, Socio-cultural
7.6.3	Support research (excluding projects funded by the gambling industry) into the impacts of gambling in local communities.	Environmental, Socio-cultural

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## 13. Further information

For further information on Council's Gambling Harm Prevention Policy Statement, please contact Council's Social and Strategic Planning team on **1300 179 944** or email [socialplanning@hobsonsabay.vic.gov.au](mailto:socialplanning@hobsonsabay.vic.gov.au)

## 14. Document control

<b>Policy Name</b>	Draft Gambling Harm Prevention Policy Statement
<b>Object ID</b>	
<b>Agility Document Number</b>	
<b>Responsible Directorate</b>	Sustainable Communities
<b>Policy Owner</b>	Strategy, Economy and Sustainability
<b>Policy Type</b>	Policy Statement
<b>Date Adopted by Council</b>	
<b>Review Date</b>	

## 15. Version history

<b>Version Number</b>	<b>Date</b>	<b>Authorised by</b>
1.0	May 2023	