

city of monash public health approach to gambling

policy statement 2016-2020



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HEADING: FOREWORD FROM THE MAYOR & ACKNOWLEDGEMENT OF COUNTRY

DRAFT

HEADING 1: INTRODUCTION

Monash Council is committed to supporting its community to lead healthy, happy and thriving lives.

As the closest government to our community, we know that we have an important role to play in promoting and protecting the health and wellbeing of our residents.

Here at Monash we have long been concerned about the proliferation of poker machines in our neighbourhoods and have been a state and national leader in campaigning for action and change.

Whilst gambling is a legal form of entertainment, powerful gambling industries seek to profit from this form of entertainment. At harmful levels it can have significant health, social and economic impacts to individuals, families and communities.

Monash Council's public health position to gambling is to seek reform to the Gambling Regulation Act to place greater regulation and restrictions on the gambling industry, gambling environments and gambling machines which are designed to mislead and profit from individuals. Our position specifically advocates against the targeted concentration of poker machines in Victoria's most vulnerable and disadvantaged communities.

The Policy Statement is poker-machine specific due to Council's decision-making role and influence in planning permits and the opportunity to respond to poker machine licensing applications. Whilst Council does not have direct legislative influence in online gambling and sports betting, it will continue to support action for increased regulation of these environments and will promote gambling-free community spaces and activities in Monash.

This Policy Statement articulates in detail Monash Council's public health position to gambling which will continue to be enacted through leadership, policy, advocacy and community action.

HEADING 2: WHY FOCUS ON POKER MACHINES?

Electronic Gaming Machines [EGMs] – commonly referred to as 'poker machines' - are the greatest cause of gambling harm in Australia. 80% or more of those with a gambling problem have it because of their use of poker machines.¹

This Policy Statement has a specific focus on Electronic Gaming Machines (EGMs) due to Council's decision-making role in planning permits under the Monash Planning Scheme – and the opportunity for Council to participate in – and choose to make objections to - gaming license applications under the *Gambling Regulation Act 2003*.

Poker machines are a priority focus of Monash Council as the Monash municipality is in the top five local government areas in Victoria for the highest number of gaming venues, poker machines and losses.² Monash has consistently opposed increases to the number of poker machines locally. Monash Council is a state leader in advocating for system reform in poker machine licensing and placement, as demonstrated through the Monash Council-led 2014 *Enough Pokies* campaign.³

In recent years, Council has also become increasingly concerned about the harms of online gambling environments. Though local government does not have a direct legislative influence in this space, Monash Council will continue to support actions and initiatives which seek to place

greater regulation on online gambling environments and sports betting. Where possible, Council will also continue to lead innovative, preventative community initiatives raising awareness about the impacts of online gambling and sports betting.

This Policy Statement closely aligns with our [Council Plan](#) and [Health & Wellbeing Partnership Plan 2013 - 2017](#) both of which prioritise 'Resilience to Harm from Gambling' as a major ongoing public health priority of the Monash community.

HEADING 3: GAMBLING – A PUBLIC HEALTH PRIORITY

A public health priority

Monash Council is one of the few local governments in Victoria to have elevated gambling to the highest level of public health prominence. It is a leading public health priority in Council's *Health & Wellbeing Partnership Plan 2013 – 2017* and *Council Plan 2013 – 2017*. Monash is viewed by the local government sector as a leader and change-agent on this public health issue. A number of Monash Councillors have been - and continue to be - state leaders and lobbyists in campaigning for reform.

As gambling prevention is a leading public health priority of Council, this Policy Statement is a companion document to Council's current *Health & Wellbeing Partnership Plan 2013 – 2017* and the future municipal public health and wellbeing plan, which will be developed once the current plan sunsets in 2017.

Monash Council understands gambling as an evidence-based public health issue which impacts individuals, families and communities. A number of external and deliberate factors play a significant role in this public health issue, with outcomes that can include addiction, significant loss of financial resources, health, social and economic impacts and even suicide.

These external factors include state legislation and poker machine approval processes, concentration of poker machines in vulnerable areas, advertising and accessibility, poorly regulated or unregulated gambling industries and products, and state government revenue from gambling.

Council's public health position and action

Monash Council's public health position to gambling, as prosecuted through the Monash Council-led 2014 *Enough Pokies* campaign, is to seek legislative change to the Gambling Regulation Act. Specific legislative reforms, proposed by *Enough Pokies*, are sought to place greater regulation and restrictions on the gambling industry, gambling environments and high-intensity products, which are designed to mislead and profit. Monash Council strongly opposes the targeted concentration of poker machines in Victoria's most vulnerable and disadvantaged communities.

Monash Council's advocacy makes appeal to the government policy and legislation, settings and environments which facilitate extreme economic losses from individuals and communities and the subsequent health, social and economic impacts.

Council's public health action is dedicated to working with our local Monash community to raise awareness about gambling harm, encourage community ownership, positive action and participation in non-gambling community pursuits, decrease stigma and encourage help-seeking.

Council's public health role

Councils are legislated through the *Public Health and Wellbeing Act 2008* to "seek to protect, improve and promote public health and wellbeing within the municipal district."

Local governments have a responsibility through the *Local Government Act 1989* and the *Public Health and Wellbeing Act 2008* to:

- Examine and respond to the health and wellbeing needs of the community
- Take into account the diverse needs of the local community in decision making
- Advocate the interests of the local community to other communities and governments
- Foster community cohesion and encourage active participation in civic life

Monash Council's role in preventing and reducing the health, social and economic impacts of gambling, is fulfilled through a number of mechanisms. These are:

- Political and community leadership and advocacy
- Evidence-based and innovative public health policy, prevention, programs and awareness
- High-profile political and media campaigns
- Choosing to participate in and oppose local venue applications to establish or increase poker machines
- Seeking external funding to enable public health programs in this space
- Community engagement and capacity-building
- Statutory planning
- Supporting and partnering with community and service sector stakeholders working in the field of gambling research, prevention and treatment
- Action-based, community and state partnerships
- Gambling research and data collection
- Making submissions to gambling-specific state and federal government reviews and public enquiries
- Providing clear and transparent information to our organisation and community on our local Monash gambling statistics and help services available

'Responsible gambling' – Council's position

Council rejects the rhetoric of 'responsible gambling', which seeks to shift the responsibility from the industry and the harmful product, to the individual. This language deliberately hides the predatory conduct of the gambling industry, state participation in profiting from poker machine revenue and the harmful gambling environments which lead individuals to gamble.

Australia's lead academic in critical gambling studies, Dr Charles Livingstone (Monash University), has referred to 'responsible gambling' as a 'carefully structured, elastic and goalless term' which 'transfers responsibility for gambling problems to end users rather than those profiting from the dangerous product.'⁴ Council is in support of this position.

HEADING 4: PURPOSE OF POLICY STATEMENT

It is the intent of the Policy Statement [the Statement] to provide a clear, consistent and decisive position on Council's public health position to gambling.

The Statement is evidence-based and informed by the Monash community who have participated and engaged in Council's gambling community consultation and action over recent years, including

- 2012: Monash in Four Survey (2012)
- 2013: Landmark research and municipal-wide consultation 'Impacts of Problem Gambling in the City of Monash'
- 2014: 10,000+ Monash community residents who pledged their support to the Monash Council-led 2014 *Enough Pokies* campaign
- 2014 – 2017: Clayton CANVAS local gambling harm prevention program (2014 – 2017)

The Statement outlines nine policy priorities for Council to advance its public health approach to gambling.

These are:

1. Electronic Gaming Machines [EGMs] – poker machines – in Monash
2. Gambling as a Public Health Priority
3. Political Leadership & Advocacy
4. The Use of Council Resources and Facilities for Gambling Purposes
5. Gambling-Free Community Activity
6. Community Consultation
7. Partnerships
8. Funding
9. Research, Monitoring and Evaluation

These policy priorities are detailed on pp. 13- 18.

HEADING 5: THE FACTS & STATS – AUSTRALIA, VICTORIA & MONASH

AUSTRALIA

- Poker machines are the greatest cause of gambling harm in Australia. 80% or more of those with a gambling problem have it because of their use of poker machines.⁵
- In 2013 – 2014, Australians lost \$11 billion dollars to the poker machines.⁶
- Australia has rapidly become the poker machine capital of the world with five times machines per capita than the USA. Australia has 20% of the worlds' poker machines, despite having less than 0.3% of global population.⁷
- Australians are believed to spend more per person on gambling than any other country in the world.⁸
- As at 2014, Australia was estimated to have 199, 829 poker machines.⁹
- A Productivity Commission report on gambling in 2010 was clear that gambling leads to financial, family and psychological problems, including crime and suicide. It stated that Australia's 115,000-plus problem gamblers – who are mainly low-income earners - lose a disproportionate amount of money, contributing to 40% of the total cash put into poker machines.¹⁰

- Amongst people who use poker machines regularly, 30% have some level of gambling problem – half of these very serious.¹¹
- People who experience gambling harm typically spend more than \$25,000 or more per year on gambling, money diverted from other more important uses, often including mortgage payments or rent.¹²
- Gambling is associated with mental and physical health issues, financial difficulties including bankruptcy, divorce, separation, neglect of children and in severe cases, suicide. Poker machine expenditure is also associated with increased crime rates, including crimes of violence.¹³
- 115,000 Australians are directly and seriously harmed by gambling.¹⁴
- For every person directly harmed by gambling, between 5 and 10 friends, family and others, including employers, are also affected.¹⁵
- 400 suicides a year are attributed to gambling.¹⁶
- 70% of Australians believe that gambling should be more tightly controlled.¹⁷

VICTORIA

- Each year, over \$2.5 billion is lost to poker machines across Victoria. That's almost \$7 million per day out of the pockets of Victorians and into gaming machines.¹⁸
- Approximately 12% of Victorian state government tax revenue is derived from poker machine losses. Every year the state budget receives a significant windfall from poker machine losses, with more than \$1 billion in taxes.¹⁹
- Victoria's poker machines are concentrated in areas of social and economic disadvantage. These are communities which can least afford to carry the burden. More poker machines attract a higher level of gambling, and greater damage to the lives of those already struggling.²⁰
- Across metropolitan Melbourne, our most disadvantaged municipalities have the highest density of poker machines. This is a deliberate strategy of the gambling industry. Concentrating poker machines in this way guarantees that social space will be saturated with poker machines. Because poker machines are carefully designed to be addictive, many people will end up spending far too much money on them. Municipality-wide and suburb-wide analysis can often disguise or understate the real impacts on a local area.²¹
- The City of Greater Dandenong, which is the most disadvantaged metropolitan local government area, has 8.4 EGMs (poker machines) per 1000 people respectively. Melbourne's two least disadvantaged metropolitan municipalities, Boroondara and Nilumbik have 1.5 and 1.6 machines per 1000 people respectively. In Greater Dandenong, each adult spends on average \$984 per year on poker machines. In Boroondara, that amount is \$140.²² These numbers make clear that our most vulnerable communities, with the least to spend, are faced with more machines and are spending much more money than our wealthier communities.²³
- In Victoria, only 2% in every dollar lost on poker machines is donated back to community groups.²⁴

MONASH

Council remains deeply frustrated and concerned about having some of the largest numbers of poker machines of any municipality in the state and the highest concentration of machines in our most disadvantaged communities. Council's concern is particularly for those most vulnerable in our community who can least afford to carry the burden of addiction to high-intensity machines that are designed only to profit.

- Monash is in the top five local governments areas in Victoria of highest number of gaming venues, poker machines and losses.²⁵
- There are 15 gaming machine venues in Monash with a total of 957 poker machines across the municipality. This equates to 6.34 machines per 1,000 adults.²⁶
- Million of Monash community dollars are lost to local poker machines each year and the detrimental impact to the health and wellbeing of our local residents, families and community is rife.
- In the 2014 – 2015 financial year, \$114 million dollars was lost to poker machines in Monash, the fourth highest losses in any Victorian Council area.²⁷
- A staggering \$313,000 is lost each day to poker machines by the Monash community.²⁸
- **Regional cap:** parts of the Monash community are currently subjected to a Regional Gaming Machine cap of 623 Electronic Gaming Machines [EGMs] (as set October 12, 2006 by the Victorian State Government). Suburbs covered by the regional cap include Ashwood, Chadstone, Hughesdale, Huntingdale, Oakleigh, Oakleigh East, Oakleigh South, Clayton, Notting Hill and Mulgrave. Venues in suburbs affected by the municipal cap include the Clayton RSL, Foresters Arms Hotel, Leighoak, Matthew Flinders Taverner, Monash Hotel, Oakleigh Junction Hotel, the Vale Hotel, Vegas at Waverley Gardens and the Village Green Hotel.²⁹
- **Municipal cap:** a municipal cap of 770 EGMs is applied to parts of the Monash municipality not covered by the regional cap (as set September 10, 2012 by the Victorian State Government).³⁰
- Municipality-wide and suburb-wide analysis can often disguise or understate the real impacts on a local area. For example, Council's 2013 '*Impacts of Problem Gambling in the City of Monash*' research identified Clayton as a particularly vulnerable suburb to gambling-related harm in Monash due to the following factors:
 - Clayton has one of the highest-earning poker machine venues in the state – L'Unico Hotel
 - Clayton has an estimated above-Victorian-average rate of moderate-risk and significant-risk of people harmed by gambling
 - Clayton has a very high density of EGMs per adult population – 11.6 per 1,000 adults – nearly twice the Victorian average of 6.1 per 1,000 adults
 - Clayton has a relatively higher level of disadvantage when compared to other local areas in Monash, according to the SEIFA index of disadvantage (score of 971.8).
 - Clayton has the highest percentage of people speaking a language other than English at home and the highest percentage of unemployment in Monash. A large percentage of at-risk groups to gambling harm reside in Clayton including Chinese and Punjabi-speaking community members, international students and young people.³¹

Please see Appendix 1 City of Monash Gaming Machine Data 2014 – 2015 for further information

HEADING 6: VICTORIA'S REGULATORY ENVIRONMENT

Poker Machine Licensing

Councils do not authorise poker machine licensing. The State Government body - the Victorian Commission for Gambling & Liquor Regulation (VCGLR) - is the decision-making authority on poker machine licensing. Applications for new poker machine licenses, or increases

to existing poker machine licenses, go before the VCGLR, and in some cases the Victorian Civil and Administrative Tribunal (VCAT), when Councils escalate decisions made by the VCGLR.

The current regulatory framework for poker machines and gambling provides little protection to Victoria's most vulnerable. It is of critical concern to Monash Council and many Victorian Councils that the major gaming operators are increasingly targeting and exploiting some of Victoria's most disadvantaged communities with the placement of their poker machines.³² As exposure to poker machines is a key determinant in greater gambling activity, placing pokies in socially and economically disadvantaged communities poses a significant public health threat.³³ Evidence finds that the greater the numbers and concentration of poker machines in a particular area, the higher the levels of gambling and damage to the lives of those already struggling.³⁴

Victorian councils are severely disadvantaged when it comes to poker machines licensing with the current system of approval heavily favouring the applicant.³⁵ Between July 2007 and June 2014, 132 out of 142 poker machine applications were approved by the VCGLR.³⁶ That is a 94% success rate for venues increasing poker machines in their local community. These 132 approved applications allowed an additional 2,867 poker machines into Victoria.³⁷

The current system discourages councils from objecting to poker machine licensing applications. Between 2008 and 2014, of the 68 instances where councils opposed the application, on only eight occasions was the council successful – a failure rate for councils of 88%. This means that the success rate of the applicant is almost the same, whether local councils oppose it or not.³⁸

It costs councils up to \$100,000 each time they oppose an application, win or lose – this is ratepayers' money that is in great demand for use elsewhere. A successful applicant quickly recoups their application costs and legal fees through an operational poker machine.³⁹

In recent years a number of councils have chosen not to lodge objections and/or appear at VCGLR hearings. This is due to the adversarial nature of the system and the growing evidence that Victorian Councils are fighting an impossible and losing battle.⁴⁰

It is of great concern to Monash Council that local government is virtually powerless to influence the poker machine licensing system that heavily favours the applicant and appears to be a willing collaborator in the targeted concentration of poker machines in Victoria's most vulnerable communities.

Community Benefit

In its decision-making, the VCGLR needs to be satisfied that the 'net economic and social impact of the poker machines application will not be detrimental to the wellbeing of the community'.⁴¹ The State Government's position that poker machines stimulate economic activity and deliver community benefit to the local community⁴² is in deep contrast to what Councils and communities experience on the ground.

Monash Council argues that the way 'community benefit' of poker machines in local communities is currently assessed is flawed, vague, subjective and unfairly provides advantage to an applicant over a council or a community opposed to an application.⁴³ In Victoria, only 2% in every dollar lost on poker machines is donated back to community groups.⁴⁴ Venues are currently claiming extra parking, refurbished bar-rooms and minor community donations as a 'community benefit'. One venue in Melbourne attempted to claim a 'donation' to a school no longer in operation as an offset to install more poker machines.⁴⁵

State Government Revenue

State and territory governments rely heavily on gambling tax for revenue, despite it being a major public health issue.⁴⁶ Large spending programs of state and territory governments, including hospitals, schools and infrastructure, leads governments to source revenue where they can. Gambling tax revenue is a lucrative avenue.⁴⁷ Due to this, Government policy on gambling is severely compromised.⁴⁸

Local government concern about the social harm to communities caused by poker machines increasingly puts councils at odds with state government, which rely heavily on taxes and licence fees paid by the gambling industry.⁴⁹

HEADING 7: MONASH COUNCIL'S LEADERSHIP

Monash Council is regarded as a state-wide leader and expert in gambling advocacy, research, evidence-based community health promotion and prevention programs and has led campaigns including *Enough Pokies (2014)*, *Clayton CANVAS* program (2014 – 2017), undertaken breakthrough research through the *2013 Impacts of Gambling in the City of Monash* and has contributed to the formation of the national *Alliance for Gambling Reform (2015 onwards)*. Monash has consistently opposed increases to the number of poker machines locally.

Monash is proud of the political leadership, courage and advocacy our Council leaders have continued to take on this issue, in representing the views of our community and in advocating to the state and national government for improved regulations to control and reduce the detrimental impact of poker machines in our most vulnerable communities.

Most importantly, Council is motivated by our local community who continue to show their commitment to preventing gambling harm throughout our municipality. In 2014, an unprecedented 10,000+ Monash community groups and residents pledged their support to the *Enough Pokies* campaign. The *Clayton CANVAS* local gambling prevention program continues to attract unparalleled community engagement and ownership of community-led positive solutions and activities free from gambling harm.

HEADING 8: TIMELINE OF COUNCIL'S LEADERSHIP – MAJOR HIGHLIGHTS



HEADING 9: POLICY STATEMENT

It is the intent of the Policy Statement [the Statement] to provide a clear, consistent and decisive position on Council's public health position on gambling.

The Statement outlines nine policy priorities for Council to advance its public health approach to gambling.

These are:

1. Electronic Gaming Machines [EGMs] – poker machines – in Monash
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These policy priorities are to be applied to all relevant Council activity and decision-making with whole-of-Council ownership.

POLICY PRIORITY 1: Electronic Gaming Machines [EGMs] – poker machines - in Monash

1.1 All planning decisions and advice relevant to gambling matters will be made in accordance with this Policy Statement and the relevant provisions of the amended Monash Planning Scheme:

- Clause 52.28 'Gaming'
- Clause 21.06.2 'Activity Centres'
- Clause 21.06-3 'Activity Centres – Objectives, strategies and implementation'

Monash Planning Scheme: <http://planningschemes.dpcd.vic.gov.au/schemes/monash>

1.2 Council will advocate for a continuation of the current maximum municipal cap of 770 EGMs* in the municipality and will oppose any increase to that number or the inappropriate relocation of existing machines to areas that are considered vulnerable according to the SEIFA index of disadvantage

1.3 Council argues that further reduction of EGM caps across Victoria is required to address the alarming and increasing density and concentration of EGMs in disadvantaged communities. The current caps should be extended to limit the number of EGMs able to be located within a suburb or neighbourhood of below average SEIFA score so that the number of EGMs in these areas are equal to or less than the state-wide average of EGMs per 1,000 adult population⁵⁰

1.4 Council will oppose any applications to the VCGLR for new EGMs licences, increases in EGMs or transfer of EGMs

1.5 Council will not support any application for EGMs on Council owned or managed land

1.6 Council will actively discourage and oppose any increase in the number of EGMs, density of EGMs or numbers of gaming venues in areas with high concentrations of people most at-risk of gambling

1.7 Council will request a Social Impact Assessment (SIA) for all planning applications involving EGMs

1.8 Council will use evidence to support advocacy and decision-making regarding EGMs in the Monash community

- 1.9 Council will provide public notice to the community when there is an application for new EGMs licences, an increase in or transfer of EGMs
- 1.10 Subject to timelines and resourcing, Council will seek community views on EGM licencing applications to the VCGLR
- 1.11 Council will consider providing adequate resourcing to representation at the VCGLR and subsequent representation at VCAT hearings, if required
- 1.12 Council will request that all venue operators make a financial contribution to services and agencies that address the impacts of gambling in the Monash community, for example Gambler's Help, community health or neighbourhood houses services
- 1.13 Council's Health Promotion, Community Planning & Development and Statutory Planning departments will collaborate and share expertise on all planning applications involving EGMs
- 1.14 Council will ensure that all gaming venues adhere to the conditions in their planning permits and will advocate to the VCGLR if conditions are not being met
- 1.15 Council will provide support to surrounding municipalities' submissions to the VCGLR and VCAT by a letter detailing Council's Policy position on EGMs

*The maximum permissible number of gaming machine entitlements only applies to the part of the municipal district not covered by a regional cap.⁵¹

POLICY PRIORITY 2: Gambling as a Public Health Priority

- 2.1 Council will continue to elevate gambling to the highest level of public health prominence. Gambling will be addressed as a major public health priority in Council's future Council Plans, Municipal Public Health & Wellbeing Plans, Municipal Strategic Statement, Monash Planning Scheme and Gambling Policy Statements
- 2.2 Council recognises that whilst gambling is a legal form of entertainment, powerful gambling industries seek to profit from this form of entertainment. At harmful levels, gambling can have significant health, social and economic impacts to individuals, families and communities
- 2.3 Council's public health position to gambling recognises that there are external and deliberate factors that contribute to individual and community harm from gambling. These include state legislation and poker machine approval processes, concentration of poker machines in vulnerable areas, advertising and accessibility, high-intensity product design, poorly regulated or unregulated gambling industries and state government revenue from gambling
- 2.4 Council will continue to seek reform to the Gambling Regulation Act to place greater regulation and restrictions on the gambling industry which seeks to mislead and profit from individuals
- 2.5 Council policy, action and advocacy will be informed by evidence-based public health and wellbeing research and policy
- 2.6 Council's public health action in gambling will be dedicated to working with the Monash community to raise awareness about gambling harm, encourage community ownership, action and participation in non-gambling community pursuits, decrease stigma and encourage help-seeking
- 2.7 Council will maintain independence from the gambling industry. Council will not accept financial contributions from gambling venues and will not promote community grants or initiatives offered by local poker machine venues
- 2.8 Council rejects 'responsible gambling' rhetoric, which seeks to shift the responsibility to the individual. This language deliberately hides the predatory conduct of the gambling industry, state participation in profiting from gambling revenue and the harmful gambling environments which lead individuals to gamble

- 2.9 Council will consciously use public health language in communicating gambling messages. Language including 'responsible gambling' and 'problem gamblers' will not be used by Council due to the notion that the responsibility or problem lies with the individual. 'Problem Gambler' is to be replaced with 'People harmed by gambling.' 'Pokie players' is to be replaced with 'poker machine users.' 'Pokie venues' is to be replaced with 'Poker machines operators' or 'Gambling industry' and 'Gambling expenditure' is to be replaced with 'gambling losses' or 'money taken.'
- 2.10 Council's public health mandate will be to protect those most vulnerable to the social, health and economic harms of gambling
- 2.11 Council will promote a range of non-gambling social, cultural and recreational opportunities in Monash to promote engaged, active and healthy lifestyle choices

POLICY PRIORITY 3: Political Leadership and Advocacy

3.1 Council will continue to advocate for the proposed legislative amendments to the *Gambling Regulation Act* prosecuted through the Monash Council-led 2014 *Enough Pokies* campaign. The Municipal Association of Victoria [MAV] has been given the mandate to take these proposed reforms to the State Government to be enacted. Council will support the MAV in this action. The proposed legislative amendments are:

1. Remove 'fostering competition' as an excuse for more machines and require the VCGLR to judge that an area already has enough pokies

Section 3.1.1

There are two amendments here. One is intended to remove the provision about fostering competition, in order to permit the Commission to decide that an area already has enough EGMs and that no more are required. The second is to require the Commission to decide whether the EGM facilities in the area are sufficient to meet the needs of those who gamble without hurting themselves or others

2. Allow the Commission enough time to make the right decision

Section 3.3.8

This amendment is to remove the obligation from the Commission to make decisions within 60 days – this is likely to allow for more reflection on applications and give the Commission more room for better decisions.

3. Allow councils enough time to develop comprehensive submissions

Section 3.3.6

This amendment is to allow the responsible authority (local councils) 90 days for submission regarding EGM applications, on the basis that they use their best endeavours to complete the application within that time

4. A stronger requirement for the Commission to take council submissions into account

Section 3.3.7 (3)

This amendment is to require the Commission to 'have regard to' rather than 'consider' any submission by the responsible authority. The effect of the change is to increase the extent to which the Commission must take the submission into account in determining the application.

5. Make the applicant meet social and economic impact tests

Section 3.3.7 (1)

This amendment is to require the Commission to be satisfied by the applicant that the economic and social impact test has been met, thus placing the onus on the applicant to demonstrate this.

6. Only grant applications that benefit the community

Section 3.3.7 (1) (c)

This amendment is to modify the social and economic impact test to require the effect of the application to be beneficial to the local community.

7. Consider the specific community, not just a municipality-wide approach

Section 3.3.7 (4)

This amendment is to require the Commission to have particular regard to the social effects of the application on the immediate vicinity of the venue – not just the ‘municipal district’

3.2 While online gambling and sports betting is outside the remit of local government jurisdiction Council will advocate to the state and federal government for increased research, data collection, regulation and preventative interventions for these types of gambling

3.3 Council will make submissions to State and Commonwealth enquiries on gambling and meet with government and gambling industry representatives, where possible and appropriate, to represent the interests of the local government sector and Monash community

POLICY PRIORITY 4: The use of Council Resources and Facilities for Gambling Purposes

4.1 Council will not support any application for EGMs on Council owned or managed land

4.2 Gambling advertising and gambling activity:

4.2a. Through its Leasing and Licensing Policy, Council will not permit gambling activity, promotion or advertising in Council-owned facilities. This pertains to sports betting, online gambling and poker machines

4.2b. Council will not permit community groups or sporting clubs to advertise or promote gambling-related activity at local venues or via online gambling agencies

4.2c. Council will encourage sporting clubs to promote Gambler’s Help services in their facilities to patrons

4.3 Council staff will not run Council and community events, activities, programs and social outings in venues that have EGMs

4.4 Through the Monash Community Grants Program, Council will not support or fund community groups who meet in venues that have EGMs

4.5 Council will not support or provide community grants, funding, sponsorship, Council facilities, publicity or promotion for community groups/organisations that promote gambling. All relevant Council guidelines will align with this policy position

4.6 Council will not support community groups participating in gambling activity and will seek to increase the awareness of community groups to the harms of gambling through information provision and referral to non-gambling community activities and services

4.7 Council will not assist in promotion, administrative support, committees or co-facilitation of community grants offered by local gambling venues

- 4.8 Council urges community groups and clubs to assess its sources of external funding and consider not taking funding from local poker-machine venues due to their significant revenue from poker-machine gambling losses
- 4.8 Council has the right to block and filter internet accounts across its services to ensure computers are not being accessed for gambling activity by staff and community

POLICY PRIORITY 5: Gambling-Free Community Activity

- 5.1 Council will continue to be a state-wide leader and innovator in gambling harm prevention community programs including the 2014 – 2017 *Clayton CANVAS* gambling harm prevention project
- 5.2 Council will promote gambling support services and programs on its website, through networks and via publications
- 5.3 Council will promote alternative activities (and where possible low cost activities) to gambling that are available in Monash. Information will also be made available in key languages
- 5.4 Within existing resources, Council will aim to increase staff awareness and understanding through training and cross-departmental collaboration about the harms of gambling, the support services available and alternative social and recreational pursuits to gambling
- 5.4 Council will promote non-gambling activities and facilities through Council programs, services, infrastructure development and publicity
- 5.5 Council will support local organisations and groups to undertake initiatives aimed at gambling prevention, raising awareness about gambling and potential harm, de-stigmatisation, help-seeking avenues and opportunities for community engagement free from gambling

Council's Upcoming Events listing: <http://www.monash.vic.gov.au/Leisure/Upcoming-Events>

POLICY PRIORITY 6: Community Consultation

- 6.1 Council will communicate and consult with, where possible, the Monash community of local gambling statistics, preventative programs, community consultations, policies, campaigns, strategies and opposition to applications for EGM licences
- 6.2 Council will ensure that the community is notified through the Council website of all planning applications related to EGMs and provide opportunities for comment, if timelines allow
- 6.3 Council will include copies of all gaming related submissions it makes on the Council webpage
- 6.4 Council will include gambling-related questions in relevant surveys and consultations with community to support policy or program development
- 6.4 Council will annually publish key indicators describing the gambling environment in Monash including gambling losses, EGM numbers, gambling prevalence, gambling venues and health, current public health research and health and wellbeing impacts
- 6.5 Council will engage local, state and national media in its public health activity and communication campaigns around the issue of gambling

POLICY PRIORITY 7: Partnerships

- 7.1 Council will continue to foster its long-standing, robust partnerships and allegiances with the MAV, VLGA, the Alliance for Gambling Reform, local government sector, the Victorian Responsible Gambling Foundation, Gambler's Help Eastern/EACH, Monash University,

Local Government Working Group on Gambling [LWGOG], Link Health & Community and local neighbourhood houses and community groups in the progression of its public health approach to gambling

- 7.2 Within existing resources and where possible, Council will partner with new and existing organisations and campaigns advocating for the prevention of gambling harm
- 7.3 Council will support and promote local and state government services and community groups addressing the harms of gambling through prevention, innovative programs, service provision and treatment

POLICY PRIORITY 8: Funding

- 8.1 Council will continue to seek external funding opportunities to progress its public health leadership, activity and advocacy in gambling prevention

PRINCIPLE 9: Research, Implementation, Monitoring and Evaluation

- 9.1 Council will continue to source and maintain accurate data, information and research on poker machines and other forms of gambling for use in the development of policy, submissions, communications and for use as an advocacy tool
- 9.2 Council will continue to monitor regulation and legislation and their impacts at a Federal, State and Local Level
- 9.3 Council supports measures to prevent and/or respond to gambling harm that are evidence-based and likely to be effective in impact
- 9.4 Council will monitor decision-making principles emerging through the VCGLR and VCAT
- 9.5 Where possible, Council will participate in and/or support research undertaken by organisations on the determinants and impacts of gambling environments and gambling, and effective harm prevention and harm minimisation measures
- 9.6 Council will monitor and review Council's policy position on gambling on a regular basis to ensure its currency, appropriateness and effectiveness

HEADING 10: APPLICATION OF POLICY STATEMENT

It is the intent of the Policy Statement [the Statement] to provide a clear, consistent and decisive position on Council's public health policy approach to gambling. The public health position of the Statement and its nine policy priorities will inform and be applied to all relevant Council planning, policy, programs and decision-making. The Statement is to have whole-of-Council ownership.

The Health Promotion Coordinator will prepare an evaluation report on the implementation of the municipal public health and wellbeing plan (*Health & Wellbeing Partnership Plan 2013 – 2017*) and the companion policy statement documents that sit under it, including the *City of Monash Policy Statement – A Public Health Approach to Gambling 2016 – 2020* and the *Community Safety Framework 2015 – 2020*.

Council will monitor and review Council's policy position on gambling on a yearly basis to ensure its currency, appropriateness and effectiveness.

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Appendix 1 – City of Monash Gaming Machine Data 2014 – 2015



Reference: Victorian Responsible Gambling Foundation [Gambling Information Resource Office] 2015, *City of Monash Gaming Machine Data*, Victorian Responsible Gambling Foundation [Website], 2015 – information collated using 2014 – 2015 data from the Victorian Commission for Gambling & Liquor Regulation, accessed 16 December 2015. <http://www.responsiblegambling.vic.gov.au/information-and-resources/your-local-government-area>

HEADING 12: SELECTED RELEVANT WEBSITES & RESEARCH

MONASH COUNCIL

Clayton CANVAS 2014 - 2017

<http://www.monash.vic.gov.au/Services/Health-Safety/Gambling/Clayton-CANVAS>

City of Monash Events

<http://www.monash.vic.gov.au/Leisure/Upcoming-Events>

Council Plan 2013 – 2017

<http://www.monash.vic.gov.au/About-Us/Council/Publications/Council-Plan>

Enough Pokies 2014 Monash Council-led campaign

<http://www.monash.vic.gov.au/Services/Health-Safety/Gambling#enough>

Gambling

<http://www.monash.vic.gov.au/Services/Health-Safety/Gambling>

Gaming Machine Data – City of Monash

<http://www.responsiblegambling.vic.gov.au/information-and-resources/your-local-government-area>

Impacts of Gambling in the City of Monash 2013 landmark research

<http://www.monash.vic.gov.au/Services/Health-Safety/Gambling#research>

Monash Planning Scheme

<http://planningschemes.dpcd.vic.gov.au/schemes/monash>

Monash Health & Wellbeing Partnership Plan 2013 – 2017 (municipal public health and wellbeing plan)

<http://www.monash.vic.gov.au/About-Us/Council/Publications/Plans-and-Strategies/Health-and-Wellbeing-Partnership-Plan>

EXTERNAL

Alliance for Gambling Reform

<http://www.pokiesplayyou.org.au/>

Australian Gambling Statistics

<http://www.qgso.qld.gov.au/products/reports/aus-gambling-stats/index.php>

Municipal Association Victoria [MAV]

<http://www.mav.asn.au/policy-services/social-community/Pages/gambling.aspx>

Productivity Commission Inquiry Report 2010 – Gambling

<http://www.pc.gov.au/inquiries/completed/gambling-2009/report>

Study of gambling and health in Victoria: findings from the Victorian Prevalence Study 2014

<http://www.responsiblegambling.vic.gov.au/information-and-resources/research/recent-research/study-of-gambling-and-health-in-victoria>

Victorian Responsible Gambling Foundation – Gambling Information Resource Office (GIRO)

<http://www.responsiblegambling.vic.gov.au/information-and-resources/what-is-the-gambling-information-resource-office>

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