

GAMBLING HARM PREVENTION POLICY STATEMENT 2023–2025

PUBLIC EXHIBITION SUMMARY REPORT



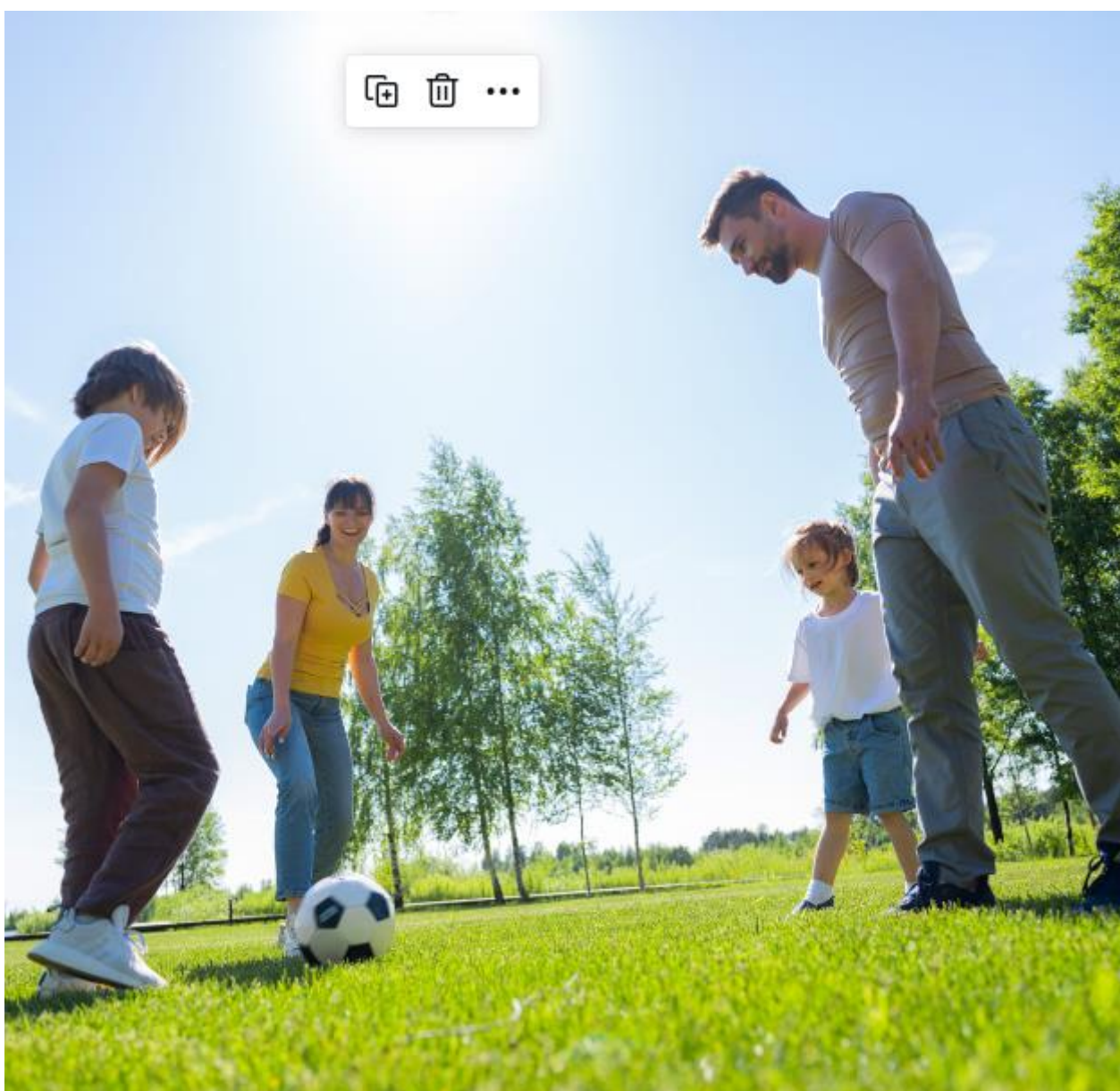
PROJECT BACKGROUND:

The Draft Gambling Harm Prevention Policy Statement 2023–2025 (the Policy Statement) has been developed to guide Council's ongoing efforts to prevent harm from gambling in Wyndham. It updates Council's Gambling Harm Minimisation Policy and Action Plan 2018–2022.

The Draft Policy Statement is underpinned by a public health approach and aims to guide Council's efforts to prevent gambling harm. The Draft Policy Statement is focused on preventing harm by promoting alternatives to gambling, evidence-based planning, and fostering social connection – a protective factor in addressing gambling harm. The Draft Policy Statement is a whole-of-Council approach to gambling harm prevention.

This report presents the outcomes from the community and stakeholder consultation period including (but not limited to) in-person engagement at the Seniors Safety and Information Expo.

Following the public exhibition and consultation period from 2 October 2023 to 30 October 2023 the Draft Policy Statement has been updated in accordance with community and stakeholder feedback received, where appropriate.




METHODOLOGY:

The below table outlines the various methods and techniques used to engage with the community.

Community engagement activities / tools

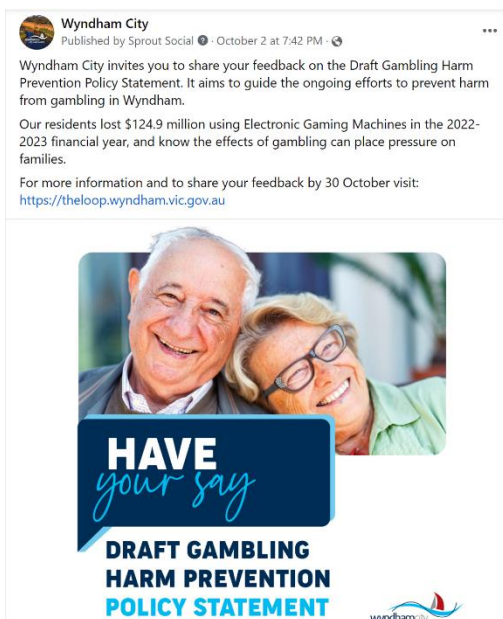
Method / technique	Stakeholders engaged
Project page on The Loop	152 total visitors to the page 394 page views
Online survey	12 surveys completed
In person survey	4 surveys completed
email distribution to stakeholders	2 written submissions received
Seniors Safety and Information Expo presentation and information stall	40 attended in-person engagement at Penrose Promenade Community Centre

Communications / marketing activities

Method / technique	Stakeholders engaged
Online promotion (Facebook post)	Total Reached: 36,077 Total Engagement: 487 Total Click through to website: 470
Online promotion (Facebook post)	Post #1 Reached: 22,045 Engagement: 455 Click through to website: 448 

Online promotion
(Facebook post)

Post #2 Reached: 14,032 Engagement: 32 Click through to website: 22

Online promotion
(LinkedIn post)

Impressions: 140



Online promotion
(Instagram post)Accounts
reached: 227

Impressions: 280

Engagement: 3

Online promotion
by others
(Facebook post)Accounts
reached: 137

Engagement: 8



Online promotion by others (LinkedIn post)

Impressions: 218

Clicks: 3

Reactions: 11



Online promotion by others (Twitter post)

Impressions: 103

Heart / like: 1

Engagements: 2



WHO WE HEARD FROM:

The below tables highlight who we heard from in our community via survey during our engagement process.

	Count	Percentage
Wyndham resident	11	61
Sporting Club	0	0
Community organisation	3	17
Gambling venue	0	0
Advocacy group	1	6
Service provider	3	17
Other	2	11

Age Group

Under 9	10-14	15-19	20-24	25-29
0	0	0	0	6%
30-34	35-39	40-44	45-59	50-54
6%	0	6%	0	20%
55-59	60-64	65-69	70-74	75-79
12%	12%	20%	12%	6%
80-84	85+			
0	0			

Gender

Male	Female	Prefer not to say	I identify as...
25%	69%	6%	

Suburb

Cocoroc	Eynesbury	Hoppers Crossing	Laverton	Laverton North
		13%		
Little River	Mambourin	Manor Lakes	Mount Cottrell	Point Cook
				6%
Tarneit	Truganina	Werribee	Werribee South	Williams Landing
19%	6%	6%	6%	6%
Wyndham Vale	Outside of Wyndham			
6%	32%			

Do you speak a language other than English at home?

Yes	No
39%	61%

SUMMARY OF FEEDBACK:

The following feedback will help to shape the final Wyndham Gambling Harm Prevention Policy Statement 2023-2025. Once incorporated, the Policy Statement is scheduled to go to the Council Meeting on 19 December 2023 for endorsement.

Community feedback indicated strong support for the basis and direction of the Draft Policy Statement. The key themes emerging from the consultation are summarised below.

Communication

Community feedback was provided on the levels and forms of stakeholder engagement including on communication:

- Provide education and awareness of broad ranging gambling harms
- Add that legacy impacts prevail and there are also intergenerational impacts
- Maintain emphasis on impacts on the family unit (not just individuals).

Partnership

Community feedback was provided on the levels and forms of stakeholder engagement including on partnership:

- Maintain emphasis on working with project partners that help people with lived experience expertise share their story
- Provide information on supports available due to prevalence of gambling harm.

Collaboration

Community feedback was provided on the building blocks of effective collaboration:

- Maintain advocacy for less access to gambling, especially automated gambling.

Coordination

Community feedback was provided on aligning activities towards a shared purpose of using the public health approach to avoid preventable gambling harm:

- Support understanding that many issues co-occur such as housing stress, mental health, and gambling
- Strengthen collaboration across sectors such as family violence services and explore working with project partners that provide grief and loss counselling.

Education and awareness raising

Community feedback was provided on education and awareness raising:

- Support people affected to capture lessons learned and increase awareness of community groups
- Support sharing stories of resilience, recovery, and harm
- Support reducing shame and stigma including of both gamblers and affected others.

Lived experience critical

Lived experience expertise has been used to influence, drive and design the Draft Policy Statement and will also help shape the upcoming implementation phase.

- “As an affected other I have experienced firsthand the effects of gambling. The damage is not just confined to money. It is emotional and physical too. Relationship breakdown is inevitable. Grief and loss counselling is a must. The shame and stigma will keep it hidden and this must change . . .” – community member
- “My journey was a long one as I never thought I had a problem, always thought I was just bad with money. Asking for help before things get out of control is massive, as this can lead to actually saving relationships and keeping people in the family home” – community member

Submissions

Two stakeholder submissions were received, one from the Victorian Local Governance Association (VLGA) and the other from BSP Lawyers on behalf of Hoppers Crossing Sports Club (the Club). The VLGA submission indicated strong support for the basis and direction of the Draft Policy Statement. The Club submission indicated the Draft Policy Statement requires further consideration and amendments. Council’s response to the submissions is available later in this document.

ONLINE SURVEY VIA THE LOOP

Following is a summary of the twelve (12) online survey responses received.

We Asked	You said	Our response
<p>What do you think about our Draft Gambling Harm Prevention Policy Statement?</p> <p>Note: Links on gambling help supports for anyone affected by gambling were provided.</p>	<p>The key themes that emerged from survey responses were:</p> <p>Strongly agree (4 related comment)</p> <p>Agree (7 related comments)</p> <p>Neutral (1 related comment)</p>	<p>Noted.</p> <p>This is consistent with Council’s view that gambling as a public health priority is important to the Wyndham community and our stakeholder partners.</p>
<p>Is there anything we might have missed that you think should be included?</p>	<p>Provide further data on financial losses happening over time (1 related comment)</p>	<p>Adjusted the Draft Policy Statement by adding showing losses from Electronic Gaming Machines (EGMs) in Wyndham City over the past five years, with record losses in the most recent financial year (at Appendix).</p>
	<p>More awareness is needed, and every story of individuals affected can help with learning and education (1 related comment)</p>	<p>Adjusted the Draft Policy Statement to include reference to IPC Health, and the ReSPIN Gambling Awareness Speakers Bureau (at Section 3.4 Monitoring framework).</p>
	<p>Provide information and programs that cater to specific ethnic groups in the community (2 related comments)</p>	<p>Adjusted the Draft Policy Statement to make clear that the Gender Impact Assessment (GIA) undertaken to help inform the development of the Policy Statement highlighted priority groups, the association between social isolation, and recognised the diversity of multicultural communities and individuals. A focus is needed on the family not just the individual regarding gambling and multicultural communities (at Section 2.5 Gender equity assessment).</p> <p>Wyndham City continues to work in partnership with multicultural community leaders and target audiences to better understand how best to communicate public health messaging that people respond to.</p>

	<p>Would like to see partnerships with Victoria Police about illegal gambling activities in Wyndham (1 related comment)</p>	<p>Adjusted the Draft Policy Statement to acknowledge project contributors (at Project contributors, p. iv).</p> <p>Gambling is a source of, and associated with, serious harm. Including increased rates of family violence, and crime – both violence and property.</p> <p>Effectively addressing these complex issues at a local level requires partnerships and collaboration. The Wyndham Family Violence Network (WFDN) is supported and convened by Wyndham City and chaired by Victoria Police. The WFDN is an independent network of relevant local service providers.</p> <p>Project contributors to the Draft Policy Statement include the WFDN. The WFDN is a mechanism to develop and support partnerships amongst key stakeholders based in and working in Wyndham, and to facilitate collaborative efforts.</p>
	<p>The gambling industry's commercial interests tend to override all other interests (1 related comment)</p>	<p>Adjusted the Draft Policy Statement to state that accessibility of gambling opportunities is linked to rates of risk and harm (at Section 1.1 Background).</p> <p>Note: public health research has a role to play in identifying and explaining the structural and commercial drivers of harm and inequities and how these might be prevented¹. Council's comprehensive public health approach to gambling harm prevention is based on core public health principles.</p>

¹ Thomas, S., Cowlshaw, S., Francis, J., Schalkwyk, M., Daube, M., Pitt, H., McCarthy, S., McGee, D., Petticrew, M., Rwafa-Ponela, T., Minja, A., & Fell, G. (2023). Global public health action is needed to counter the commercial gambling industry, *Health Promotion International*, 38(5), <https://doi.org/10.1093/heapro/daad110>

	<p>Sporting clubs should not be given permission to have EGMs and Council should not provide venues or funds to sporting clubs that promote or sponsor gambling. Instead, Council's community centres and libraries could disseminate gambling harm literature and supports.</p> <p><i>(2 related comments)</i></p>	<p>Noted.</p> <p>The Draft Policy Statement adopts a 'health equity' approach, consistent with Council's Municipal Public Health and Wellbeing Plan 2021-2025. We will focus our efforts using the public health model to achieve health equity and help people with fewer resources to improve their health and wellbeing. We will continue to promote a variety of non-gambling events, activities and programs that encourage residents to lead active and healthy lives. We will ensure no funding, grants or sponsorship be made available for activities that promote gambling. We will not run Council and community events, activities, programs and social outings in venues that have EGMs. Council will support initiatives that reduce gambling operator's reliance on revenue from EGMs.</p> <p>Council's community centres and libraries are a great vehicle to disseminate gambling harm literature and raise awareness. For example, Wyndham City Libraries 'Author Talks' events included an Author Talk by The Accidental Gambler – Dr Cally Berryman in September 2022. Dr Berryman joined us for a special presentation on her book The Accidental Gambler, as well as women's health in general and how women often use gambling to deal with grief, trauma, and unresolved issues. It is anticipated that Council will continue to incorporate gambling harm related subject matter into Wyndham City Libraries programming. This could be done through engaging the ReSPIN Gambling Awareness Speakers Bureau service offering or similar in future.</p>
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	<p>More should be done to lobby the state government to reduce the number of EGMs in Wyndham. Oppose any new EGM applications and seek opportunities to remove existing EGMs in Wyndham (3 related comments)</p>	<p>Noted.</p> <p>The Draft Policy Statement makes clear its continued support for the cooperative call on the Federal and State Governments to legislate changes for harm prevention, including, but not limited to reduction over time in the total number of EGMs across Wyndham. Council will support initiatives that reduce gambling operator's reliance on revenue from EGMs.</p>
<p>Is there anything else you want to tell us about the Policy Statement?</p>	<p>Collaboration across sectors is key as is learning from those who have lived experience of gambling harm. Provide information on supports available. (2 related comments)</p>	<p>Adjusted the Draft Policy Statement to include reference to Gambler's Help and family violence support, IPC Health, and the ReSPIN Gambling Awareness Speakers Bureau (at Section 3.3 Policy statements, and Section 3.4 Monitoring framework).</p> <p>The Policy Statement will be available on Council's website once adopted and the website will include further detail on supports available.</p>
	<p>The public health approach is important as is the focus on mental health (2 related comments)</p>	<p>Noted.</p> <p>The Draft Policy Statement makes clear that mental health conditions overlap considerably with alcohol and substance misuse, and gambling. These groups of conditions share numerous risk factors, are risk factors for each other, and frequently co-occur.</p>
	<p>Include details about alternative programs – by identifying what is available now, it will be easier to determine the number of programs that can be developed or implemented in the future (1 related comment)</p>	<p>Noted.</p> <p>The engagement The Loop page included a summary of 'Key Achievements' describing various programs to date. Future programs will be informed by a public health approach, and associated project partners. It is anticipated that programs developed and implemented in the future will spotlight lived experience expertise for example.</p>

	<p>Oppose any pubs having EGM licenses (1 related comment)</p>	<p>Noted.</p> <p>The Draft Policy Statement makes clear its continued support for the cooperative call on the Federal and State Governments to legislate changes for harm prevention, including, but not limited to reduction over time in the total number of EGMs across Wyndham. Council will support initiatives that reduce gambling operator's reliance on revenue from EGMs.</p>
	<p>Really like that the language will be shifted from 'problem gambler' and other individualistic framing to include more health related terms (1 related comment)</p>	<p>Noted.</p> <p>A harm prevention and minimisation approach is developing, replacing the 'responsible gambling' paradigm. Research indicates gambling's shame and stigma often prevent help-seeking and that's why we must change the language.</p>
	<p>Support advocacy for less access to EGMs regardless of an areas' socioeconomic status (SES). The existence of EGMs cases a reduction in SES. (1 related comment)</p>	<p>Noted.</p> <p>Implementing effective and evidence based public health measures can help to protect our most vulnerable groups from disproportionate impact.</p> <p>Research indicates gambling is generally regressive – the poorest lose the most, and this is a global phenomenon. Across Melbourne, the most disadvantaged municipalities have the highest density of EGMs². Worryingly, people most harmed by gambling, have the least capacity to absorb that harm.</p>

² Victorian Government, Department of Justice. (2011). *Socio-economic impacts of access to electronic gaming machines in Victoria: Effects on demand and communities*. Retrieved from Victorian Responsible Gambling Foundation: <https://responsiblegambling.vic.gov.au/documents/89/Research-report-socio-economic-impacts-of-access-to-egms-in-Victoria.pdf>

	<p>The only way to eradicate addictive behaviours such as gambling is to get rid of gambling entirely (1 related comment)</p>	<p>Noted.</p> <p>There is a shift in focus towards assessing the burden of gambling harm. This draws on prevalence data, but identifies harms across the spectrum of risk categories. For example, there have been changes in the scale of gambling, as today's smart phones and tablets allow people to bet 24 hours a day. This makes disconnecting from gambling more challenging. Mobile smart phone betting apps have shifted the scale and intensity of gambling. This example highlights the needs of policy on gambling harm prevention and support interventions e.g., increased capacity for support services etc.</p>
<p>Please watch the video and tell us anything you'd like to share about your own lived experience of gambling harm.</p> <p>Note: lived experience expertise is being used to influence, drive and design the Policy Statement and will also help shape the upcoming implementation phase.</p>	<p>"As an affected other I have experienced firsthand the effects of gambling. The damage is not just confined to money. It is emotional and physical too. Relationship breakdown is inevitable. Grief and loss counselling is a must. The shame and stigma will keep it hidden and this must change".</p>	<p>A landmark study of Victorian coroner's court data found gambling addiction had contributed to 184 suicides over eight years. The vast majority of cases involved men aged between 17 and 44³.</p> <p>Adjusted the Draft Policy Statement to include more explanation about how listening to lived experience informed the design of the consultation. Plus, some lived experience expertise quotes. As well as added references to services and support available (at Section 1.3 How this Policy was prepared; Section 2.2 Understanding the social costs of gambling in Wyndham; and Section 4 Services and support).</p>
	<p>"My journey was a long one as I never thought I had a problem, always thought I was just bad with money. Asking for help before things get out of control is massive, as this can lead to actually saving relationships and keeping people in the family home".</p>	<p>Through sharing stories such as these, Council hopes to build a positive framework for conversations about gambling harm and decrease stigma and encourage people to seek help.</p>

	“... seeing people slowly deteriorating and how their personality started dimming ... Every story is heart (sic) broking ...”	
	“... [when I was a child, I] witnessed his violence ... To some extent, people who gamble on EGMs do so in public spaces which might curtail spending because it has some (albeit limited) surveillance protocols, but ‘home based’ gambling has no such stoppers”.	
	“People among my age group (20-30) have taken their own lives as a result of a gambling addiction and debt”.	

³ Belot, H. (2023, September 12). Gambling addiction a factor in 184 suicides in Victoria over eight years, study finds. *The Guardian*. Retrieved from: <https://www.theguardian.com/australia-news/2023/sep/12/gambling-addiction-a-factor-in-184-suicides-in-victoria-over-eight-years-study-finds>

IN-PERSON ENGAGEMENT AT SENIORS SAFETY AND INFORMATION EXPO: HELD AT PENROSE PROMENADE COMMUNITY CENTRE 9 OCTOBER 2023



The Seniors Safety and Information Expo (the Expo) was for seniors and the invitation was extended so that older people could come along to find out how to keep safe at home, know their rights and learn about activities available in the community.

The community engagement on gambling harm prevention involved a presentation and information stall at the Expo including with representation from the Community Engagement Officer – Gambler’s Help at IPC Health, and an IPC Health Counsellor, and the sharing of [a personal story from Jan](#), a Community Educator from ReSPIN Gambling Awareness Speakers Bureau – in-person, on 9 October 2023 at Penrose Promenade Community Centre. Wyndham City provided an overview of the work Council is doing to shape the comprehensive Whole-of-Council gambling harm prevention policy.

This presentation involved details of the Lived Experience Advocate’s personal story and experiences of gambling harm as an ‘affected other’. An IPC Counsellor was made available in case any attendees found it difficult to hear this story, particularly if they had experienced harm from gambling or other topics discussed on the day. Attendees were also invited to feel free to take a break at any time during the presentation.

The presentation was well received by the attendees. Approximately 40 community members attended the Expo, including those of diverse cultural and linguistic representation.

Outcomes included:

- Increased awareness and decreased shame and stigma of gambling, and gambling harm
- Facilitated discussions and promoted local services e.g., Gambler’s Help
- Established pathways for Council to collaborate further with Lived Experience Advocates and agencies that support them.

Note: information on gambling help supports for anyone affected by gambling were provided via various methods.

IN-PERSON SURVEY VIA THE LOOP

Following is a summary of the four (4) in-person survey responses received.

We Asked	You said	Our response
<p>What do you think about our Draft Gambling Harm Prevention Policy Statement?</p> <p>Note: information on gambling help supports for anyone affected by gambling were provided.</p>	<p>The key themes that emerged from survey responses were:</p> <p>Strongly agree (4 related comments)</p>	<p>Noted.</p> <p>This is consistent with Council’s view that gambling as a public health priority is important to the Wyndham community and our stakeholder partners.</p>
<p>Is there anything we might have missed that you think should be included?</p>	<p>Role grandparents play in providing supports particularly in multicultural communities, and gambling harms may persist indefinitely (1 related comment)</p>	<p>Adjusted the Draft Policy Statement by adding definition of ‘legacy, lifecourse and intergenerational harms’ (at Definitions, p. iii).</p>
	<p>Housing stress issues also overlap with mental ill-health and gambling (1 related comment)</p>	<p>Adjusted the Draft Policy Statement by adding that engagement insights highlighted that legacy harms persist. Explaining that if someone has lost their house or their savings due to having experienced gambling harm themselves or having been impacted by another person’s gambling, it’s difficult to recover from that. So, prevention is an important aspect of addressing gambling harm (at Section 2.2 Understanding the social costs of gambling in Wyndham).</p> <p>Note: studies on homelessness identify family violence as a highly prevalent feature in the histories of people experiencing homelessness.</p> <p>This is consistent with the Draft Policy Statement highlighting that research has found that mental health conditions overlap considerable with gambling, and that there is a need for action to</p>

		address co-occurring gambling and homelessness. The policy statement commitment #7 makes clear that Council will collectively advocate to increase investment in research on the health and wellbeing impacts of gambling including research into family violence, mental and physical health impacts (at Section 3.3 Policy statements).
	Good to increase awareness amongst community groups i.e., 'communities of place', and 'communities of interest' (1 related comment)	Noted. Raising community awareness amongst groups is consistent with various policy statement commitments (#1, #2 and #3) under the theme representing Council's role as partner (at Section 3.3 Policy statements). At the monitoring framework the theme of 'partner' includes the outcome: Community members have increased access to alternative activities that foster protective social connections (at Section 3.4 Monitoring framework).
	Support advocacy for less access to EGMs (1 related comment)	Noted. This is consistent with policy statement #7 committing to Council's collective advocacy to Federal and State Governments to legislate changes for harm prevention, including, but not limited to reduction in the number of EGMs (at Section 3.3 Policy statements).
	Educate children and young people about harms from online gambling (1 related comment)	Noted. This is consistent with various policy statement commitments (#1, #2 and #3). This is also consistent with the policy statement #4 committing to increasing understanding of the different ways that gambling harm may be experienced depending on intersectional attributes, such as age (at Section 3.3 Policy statements).

<p>Is there anything else you want to tell us about the Policy Statement?</p>	<p>Legacy impacts of gambling last a lifetime, and also affect between generations <i>(1 related comment)</i></p>	<p>Adjusted the Draft Policy Statement by adding definition of ‘legacy, lifecourse and intergenerational harms’ (at Definitions, p. iii).</p>
	<p>Education and awareness needed including to support affected others such as family and friends affected by someone else’s gambling <i>(2 related comments)</i></p>	<p>Adjusted the Draft Policy Statement at the purpose to make clearer that most of those experiencing gambling harm are not gambling. Gambling significantly affects non-gamblers (at Section 1.2 Purpose of this Policy).</p> <p>This is consistent with the policy statement #3 committing to promoting services that assist those impacted by gambling harm, including family and friends affected by someone else’s gambling (at Section 3.3 Policy statements).</p>
<p>Tell us anything you’d like to share about your own lived experience of gambling harm.</p> <p>Note: lived experience expertise is being used to influence, drive and design the Policy Statement and will also help shape the upcoming implementation phase.</p>	<p>“It has made life difficult.</p> <ul style="list-style-type: none"> • Walking on eggshells. • Suppress feelings due to community pressure.” 	<p>Adjusted the Draft Policy Statement to include more explanation about how listening to lived experience informed the design of the consultation. Plus, some lived experience expertise quotes. As well as added references to services and support available (at Section 1.3 How this Policy was prepared; Section 2.2 Understanding the social costs of gambling in Wyndham; and Section 4 Services and support).</p> <p>Through sharing stories such as these, Council hopes to build a positive framework for conversations about gambling harm and decrease stigma and encourage people to seek help.</p>

Submissions received

Received	Recommendations	Our response
Simon Harrex, Program and Policy Lead, Victorian Local Governance Association (VLGA)	<p><i>The VLGA commends the City of Wyndham for the important inclusions of:</i></p> <ul style="list-style-type: none"> • <i>Capturing forms of gambling activity beyond Electronic Gaming Machines, whilst reaffirming and recommitting to a public health approach to preventing gambling harms.</i> • <i>Outlining the importance of building strong partnerships, including working with the VLGA.</i> • <i>Considering the dimensions of harm, and the social costs of gambling on the municipality.</i> • <i>Having a long list of strong policy statements with a clear focus on reducing harm from gambling.</i> 	Noted.
	<p><i>The VLGA added further comment:</i></p> <p><i>The consideration of a policy statement addressing council lease and licence agreements, and the opposition of gambling activity at all Council owned venues.</i></p>	<p>Noted.</p> <p>Hoppers Crossing Sports Club is the only club with EGMs on Council-owned land. Wyndham City's Sport and Recreation team have advised that their lease does not expire until 2027.</p> <p>As stated in the Draft Policy Statement, the Policy Statement will be reviewed within two years from the date of Council adoption to maintain relevance and currency (at Section 3.4 Monitoring framework).</p>
	<p><i>The VLGA added further comment:</i></p> <p><i>The absence of information regarding the specific EGM venues operating in the City of Wyndham.</i></p>	<p>Adjusted the Draft Policy Statement to include further information on losses from EGMs in Wyndham City. Including EGM venues within the City of Wyndham and losses (July 2022 – June 2023) (at Appendix).</p>

	<p><i>The VLGA added further comment:</i></p> <p><i>Reviewing the use of the word ‘potential’ in the opening sentence of the policy introduction.</i></p>	<p>Adjusted the Draft Policy Statement at the opening sentence to make clear that gambling causes harm to people who participate, as well as their family, friends, colleagues and the community in which they live (at Section 1.1 Background).</p> <p>Note: the recently released Victorian Gambling and Casino Control Commission position statement on gambling harm has put the Victorian gambling industry on notice, warning that ‘gambling causes harm’ and harm is preventable. For further information, see: http://www.vgccc.vic.gov.au/media-release/vgccc-puts-gambling-operators-notice-minimise-gambling-harm</p>
BSP Lawyers on behalf of Hoppers Crossing Sports Club (the Club)	<p><i>It is our respectful submissions that the Policy, in its current form, requires further industry consultation and lacks much of the nuance and considerations that is required for an effective policy in an area as complex as gambling and electronic gaming.</i></p>	<p>Noted.</p>
	<p><i>The Club added further comment:</i></p> <p>Lack of separate background report: the Policy is not informed by a separate background report which might include summaries and analysis of gaming utilisation and expenditure in the Local Government Area (LGA), and more.</p>	<p>Adjusted the Draft Policy Statement to include gambling losses from EGMs in the LGA (at Appendix).</p> <p>Through this Draft Policy Statement, Wyndham City reaffirms and recommits to a public health approach to preventing gambling harms. It updates Council’s Gambling Harm Minimisation Policy and Action Plan 2018-2022.</p> <p>The Draft Policy Statement continues to attempt to address preventable harms in partnership with other stakeholders.</p> <p>This approach is consistent with Council’s role to protect, improve and promote public health and wellbeing, as required under the Victorian <i>Public Health and Wellbeing Act 2008</i>.</p>

		<p>Relationship harm is the most common type of harm from gambling. It makes up a quarter of all gambling harm experienced by Victorians. Other significant harms are to health (21 per cent), emotional or psychological distress (18.6 per cent), followed by harm from financial losses (15.6 per cent)⁴.</p> <p>Research shows that people experiencing gambling harm often have co-occurring conditions, such as relationship breakdown and family violence.</p>
	<p><i>The Club added further comment:</i></p> <p>Overlap with planning: the Policy states that it is intended to be applied alongside the Wyndham Planning Scheme. VCAT has consistently regarded any Council policy that is not incorporated in the planning scheme to be given little weight in consideration of planning applications.</p>	<p>Noted.</p> <p>The Draft Policy Statement is intended to be applied alongside the Wyndham Planning Scheme i.e., it complements rather than duplicates the Planning Scheme.</p> <p>The decision-making criteria set out in the Wyndham Planning Scheme underpins decisions relating to EGM applications in the municipality. Note: a key achievement of the previous policy was introducing a Planning Scheme Amendment to the Wyndham Planning Scheme, that embedded 'Local Schedule to Clause 52.28 Gaming' to guide the appropriate location and operation of EGMs.</p> <p>While the decision-making criteria set out in the Wyndham Planning Scheme underpins decisions relating to EGM applications in the municipality, the Draft Policy Statement clearly articulates Council's intent in relation to the provision of EGMs from a <i>public health perspective</i>.</p> <p>The Draft Policy Statement will also inform Council's submissions to the Victorian Gambling and Casino Control</p>

⁴ Victorian Auditor-General's Office. (2021). Reducing the Harm Caused by Gambling. Retrieved from the Victorian Auditor-General's Office: <https://www.audit.vic.gov.au/report/reducing-harm-caused-gambling?section=33780--appendix-b-acronyms-and-abbreviations>

		<p>Commission in response to applications for new gaming licences or amendments to existing gaming licences.</p> <p>The Draft Policy Statement aims to guide Council's efforts to prevent gambling harm.</p> <p>The Draft Policy Statement also gives organisational direction to all those within Council responsible for fulfilling Council's diverse roles and responsibilities and ongoing efforts in preventing gambling harm in the Wyndham municipality.</p>
	<p><i>The Club added further comment:</i></p> <p>Application of 'precautionary principle': the Policy is stated to be informed by application of the 'precautionary principle', being a guideline used primarily in environmental decision-making. Council's Policy should be informed not by principles such as this but by the data available to Council to ensure that gambling harms are prevented without taking a needlessly severe approach.</p>	<p>Noted.</p> <p>Council is adopting a comprehensive public health approach to gambling harm prevention that is based on core public health principles.</p> <p>Council has a statutory obligation to protect, improve and promote health and wellbeing under the Victorian <i>Public Health and Wellbeing Act 2008</i>, and to apply the 'precautionary principle' to preventing and controlling public health risk.</p> <p>The public health approach to gambling related harms acknowledges a shared responsibility for improving the health of population groups and subgroups, rather than just the health of individuals. The two key principles underpinning the public health approach to gambling related harms are:</p> <ul style="list-style-type: none"> • A range of social, economic, and environmental factors affect a person's mental and physical health and wellbeing; and • It is important to implement an appropriate mix of actions with partners and the community to achieve improved health outcomes.

		<p>This comprehensive public health approach to gambling is being adopted by the City of Wyndham to address preventable harms in partnership with other stakeholders. This approach is consistent with Council's role to protect, improve and promote public health and wellbeing, as required under the Victorian <i>Public Health and Wellbeing Act 2008</i>.</p> <p>'Responsible gambling' is an industry-derived paradigm for addressing 'problem gambling'. It individualises the issue, whilst ignoring the harm creating capacity of the product, and is reliant on treatment.</p> <p>Gambling harm is amendable to the public health approach and is highly preventable.</p>
	<p><i>The Club added further comment:</i></p> <p>Consideration of benefits: the Policy does not acknowledge the countervailing benefits that result from the provision of electronic gaming machines, and the use of expenses to fund, promote and support sports and activity within the local government area – being social and economic benefits. In representing a balanced and considerate position the Policy should correctly acknowledge the benefits that are provided by clubs that offer gaming machines. The Policy outlines some of the harms that can occur as a result of gambling. However, the Policy does not acknowledge that there can also be considerable benefits – particularly in an area that requires new infrastructure, entertainment and sporting activities, which Council's Policy acknowledges that Wyndham needs. Sporting clubs in particular also have a positive impact on community wellbeing issues such as social isolation, which Council highlights as a factor impacting gambling harms.</p>	<p>Noted.</p> <p>Various 'determinants' shape risk and potential for gambling harm including commercial factors (see information on the commercial determinants of health at https://www.who.int/health-topics/commercial-determinants-of-health#tab=tab_1). This includes the economic relationships and transactions between the gambling industry, government and communities.</p> <p>Note: the recently released Victorian Gambling and Casino Control Commission position statement on gambling harm has put the Victorian gambling industry on notice, warning that 'gambling causes harm' and harm is preventable. For further information, see: http://www.vgccc.vic.gov.au/media-release/vgccc-puts-gambling-operators-notice-minimise-gambling-harm</p> <p>Different gambling products are associated with different levels of harm. The 'Victorian Population</p>

		<p>Gambling and Health Study 2018–2019’ involved a mobile phone and landline survey of 10,638 randomly selected Victorian adults conducted in 2018–19. In consideration of both prevalence and harm, the gambling activities with the greatest population impact include EGMs⁵. EGMs are considered one of the most harmful forms of gambling. This is owing to specific features of EGMs such as the rapid speed of play.</p> <p>The financial burden of these losses is spread across the household through the diversion of essential spending, as well as in the community through the concentration of expenditure in gambling premises.</p> <p>The more accessible gambling opportunities are in an area or community, the more people will choose to gamble, and Council is concerned about this including because increased consumption of gambling has also been linked with increased amount of gambling related harm.</p> <p>The inequity in the distribution of this population level harm, has led to demands for action to protect public health. The Draft Policy Statement delivers an evidence-based public health approach to gambling related harm.</p>
	<p><i>The Club added further comment:</i></p> <p>Opposing EGMs on Council Land: in the Policy, Council states that it will oppose any applications for EGMs on Council owned or managed land. The Club refers to the benefits that can occur as a result of gaming at community venues. It is common that facilities such as sporting clubs and other organisations that</p>	<p>Noted.</p> <p>The Draft Policy Statement aims to decrease losses from gambling, not increase the “community benefit”. A focus on maximising “benefits” is counter to good public health practice.</p> <p>Council is not seeking to maximise benefits from EGM operators including</p>

⁵ Victorian Responsible Gambling Foundation. (2020). Victorian Population Gambling and Health Study 2018-2019: Research Report. Retrieved from Victorian Responsible Gambling Foundation: [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://responsiblegambling.vic.gov.au/documents/759/Population_study_2018_2019_PUBLISHED_REPORT_March_2020.pdf](https://responsiblegambling.vic.gov.au/documents/759/Population_study_2018_2019_PUBLISHED_REPORT_March_2020.pdf)

	<p>service the local community will operate on Council owned land. This means that this aspect of the Policy disadvantages sports clubs as compared with hotels. If Council wishes to have these clubs reduce their reliance on gaming revenue, then Council may wish to work with those clubs to transition away from this revenue, but as the Policy is currently drafted it simply penalises community clubs for operating on Council land. This aspect of the Policy however, does not apply to hotel venues which are more generally on privately owned land, therefore potentially disadvantaging the most community focused gambling venues.</p>	<p>because it does not want its decision making compromised with it comes to dealing with applications.</p> <p>Councils have a statutory responsibility to respond to planning permit applications for EGMs and have a role in licensing processes.</p> <p>The Draft Policy Statement adopts a 'health equity' approach, consistent with Council's Municipal Public Health and Wellbeing Plan 2021-2025. We will focus our efforts using the public health model to achieve health equity and help people with fewer resources to improve their health and wellbeing. We will continue to promote a variety of non-gambling events, activities and programs that encourage residents to lead active and healthy lives. We will ensure no funding, grants or sponsorship be made available for activities that promote gambling. We will not run Council and community events, activities, programs and social outings in venues that have EGMs. Council will support initiatives that reduce gambling operator's reliance on revenue from EGMs.</p>
	<p><i>The Club added further information:</i></p> <p>The Club's community contributions provide benefits to the community, and other clubs within the LGA likely provide similar benefits to the community. There are positive community benefits of a Club that includes gaming amongst its offerings, and it submitted that benefits such as these need to be included in an assessment of the Policy by Council.</p> <p>The Club takes its obligations seriously and is committed to consistently contributing to the community in many ways including sports and health care and will ensure the Club's gaming offering is managed in a manner that allows responsible service of gambling.</p>	<p>Noted.</p> <p>As mentioned earlier, the Draft Policy Statement has been adjusted to include gambling losses from EGMs in the LGA (at Appendix). Gambling diverts expenditure from alternative uses.</p> <p>Gambling, especially automated gambling, is not highly productive of employment, especially compared to other consumption expenditure.</p> <p>Gambling is also linked to many other health and social issues in communities.</p> <p>There is the need for services to support people who experience gambling harm – not just for the</p>

		people who participate in gambling and experience gambling harm, but also for their family and affected others.
	<p><i>The Club added further information:</i></p> <p>The Club indicates that Council’s proposed Policy requires further consideration and amendments, to ensure that it can achieve an outcome that supports responsible gambling and minimises gambling-related harms, without compromising the positive contributions that clubs such as theirs make to the LGA.</p>	<p>Noted.</p> <p>There is a reorientation away from ‘responsible gambling’ in Victoria and other jurisdictions. The harm prevention approach is replacing the ‘responsible gambling’ paradigm. Gambling’s shame and stigma often prevent help-seeking and that’s why we must change the language.</p> <p>The Draft Policy Statement is focused on preventing harm by promoting alternatives to gambling, evidence-based planning, and fostering social connection – a protective factor in addressing gambling harm.</p>



NEXT STEPS:

- Council will use the feedback provided by this consultation to inform the final Gambling Harm Prevention Policy Statement 2023-2025. The Policy Statement is schedule to go to the Council meeting on 19 December 2023 for endorsement.
- Council will publish the Public Exhibition Engagement Summary Report after the December 2023 Council meeting.

STAGES OF THE PROJECT



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