

7.2.5 PUBLIC HEALTH APPROACH GAMBLING HARM POLICY

Responsible Manager:	Fee Harrison, Manager Community Strengthening
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RECOMMENDATION

That Council endorses the revised Public Health Approach to Gambling Harm Policy.

INTRODUCTION

Council's Public Health Approach to Gambling Harm Policy (the Policy) outlines the commitments Council will make to prevent gambling harm in Monash. The last Policy was endorsed in 2022 with a commitment to review the Policy every two years or as required.

At the January 2026 Council meeting, the updated Policy was endorsed for public exhibition and community consultation. Consultation opened on Wednesday 11 February and closed Sunday 15 March 2026.

Monash Council is regarded as a leader in gambling harm prevention through its history of strong policy position and innovative initiatives. The updated Policy seeks to build upon that history and the foundation of the previous policy.

COUNCIL PLAN STRATEGIC OBJECTIVES

- A healthy, safe and connected community: A community where all people have the opportunity to experience enhanced levels of social, emotional and physical wellbeing.
- A council with good governance, strong leadership and community involvement in decision making: A Council that provides governance and leadership for the benefit of our community through community engagement, advocacy, decision making and action.

BACKGROUND

In 2024-2025 officers reviewed updates to the evidence base, conducted an updated Gender Impact Assessment (GIA) and met with internal teams to understand any implementation issues or process changes that may impact Policy implementation.

In updating the Policy, some of the key changes from the previous policy emerged as a result of the literature review and internal stakeholder engagement processes. These included:

- Updates to evidence/literature
- Measures to improve community understanding of the Policy, including a reduction in the length of the Policy and less technical language
- An identified need to provide alternative spaces and programs to the community to encourage alternative activities to gambling and increase social connection opportunities

- An opportunity to leverage Council’s existing touchpoints within the community to address gambling harm through education and capacity building e.g. through community grants recipients, sports clubs and community groups
- A greater focus on the broader gambling environment, including recognising potential harm caused by community fundraisers that have strong pro-gambling elements
- An identified need to respond to gambling harm in identified at-risk cohorts and settings, including young people, older women and sporting clubs
- Clearer wording regarding Council not providing support or resources to community groups and clubs that actively promote gambling, leveraging the Sports Club Framework and leasing agreements
- Consideration of Council’s broader sphere of influence beyond the assessment of applications for new Electronic Gambling Machines (EGMs). This includes a range of responses to address gambling harm such as advocacy, leasing agreements, grants, community education, and the delivery of alternative community programs and spaces

DISCUSSION

Consultation on the updated Public Health Approach to Gambling Harm Policy (the Policy) aimed to understand whether the refreshed draft Policy met the needs of community in preventing harm from gambling in Monash and to determine new opportunities for implementation of the Policy.

Through a range of all-of-community and targeted engagement strategies, Council received over 100 comments via Shape Monash and written feedback. All comments were themed and reviewed with a gender, age and experience of gambling harm lens. Refer to **Attachment 1 Engagement Report** for the full report and all comments received and officer responses.

Approximately 25 actions have been identified as a result of community and stakeholder engagement. These actions include amendments to the Policy or inform Officer implementation of the Policy once endorsed. A summary of the outcomes is discussed the Consultation section of this report.

FINANCIAL IMPLICATIONS

There are no financial implications for this report. The Policy and associated actions will be implemented within existing Council resources.

POLICY IMPLICATIONS

The Monash Health and Wellbeing Plan 2025-2029 outlines Council’s commitment to improving the health and wellbeing of the Monash community. Gambling harm prevention is specifically identified within Priority two; Building a Respectful and Safe Community, Objective 2.3- Reduce harm from gambling, tobacco and alcohol.

Amendments to the Public Health Approach to Gambling Harm Policy are recommended as a result of community consultation. These amendments are summarised within the ‘consultation’ section of this report.

CONSULTATION

Consultation aimed to understand whether the refreshed draft Policy met the needs of community in preventing harm from gambling in Monash and to determine new opportunities for implementation of the Policy.

Council heard from 51 community members via Shape Monash, seven community members at a pop-up consultation at Power Neighborhood House, four stakeholders provided written feedback (including Gambling Harm Lived Experience Experts) and a cultural consultation was held with Wurundjeri Land Council.

Officers attended the Monash Youth Advisory Committee and the Positive Ageing Reference Group. Other stakeholders invited to participate included Bunurong Land Council (declined due to capacity) and EGM operators within Monash (no response received). All (88) sports clubs in Monash were alerted to the fact the policy was under review and invited to participate in the Shape Survey via emails sent on 17 February and 10 March.

Consultation aimed to engage with all of community as well as target groups including young people, older people, multicultural communities, First Nations communities, stakeholders and people with lived experience of gambling harm. Survey responses combined with targeted engagement provided input from all target audiences.

The majority of respondents agreed with Council's approach to gambling harm prevention and advocacy commitments. Overall, feedback received from stakeholders recommended minor wording changes to improve clarity or incorporate newly released data.

In summary, the actions recommended as a result of community input include:

- Explore profiling free/low-cost social spaces that provide entertainment e.g. music or food as part of Policy implementation.
- Amend the Policy to provide clear guidance regarding sports clubs and community groups receiving donations from gambling entities. Implementation of the Policy will prioritise communication with community groups and sporting clubs.
- Explore opportunities to connect Gamblers Help with the Oakleigh area.

Officers will amend the Policy with the minor wording changes and updates to data as suggested by stakeholders. Other stakeholder input included:

- Amend the Policy to explicitly include cohorts which data shows are most at risk of gambling harm (young people, First Nations communities, older people and multicultural communities) as target audiences for harm prevention communication and education.
- Available studies on First Nations experiences of gambling harm will be incorporated into the Policy/background document.
- Officers will continue to seek opportunities to engage with First Nations community and organisations to address harm from gambling.

The feedback from lived experience experts will be prioritised and implemented:

- Avoid potentially triggering language and imagery
- Explore options for community education on the addictive nature of EGMs
- Promote Gamblers Help as a ‘free’ service and one that is available to family and friends of people experiencing harm
- Provide support to community members seeking to provide input on EGM applications and gambling harm prevention generally

SOCIAL IMPLICATIONS

The updated *Public Health Approach to Gambling Harm Policy* will support Council’s agenda for a healthy and engaged Monash community, with a focus on prevention of harm from gambling, particularly for those most at risk of gambling harm, including young people, older women, First Nations communities and multicultural communities.

HUMAN RIGHTS CONSIDERATIONS

The *Public Health Approach to Gambling Harm Policy* recognises that gambling is a legal form of recreation; all community members have a right to choose to participate in gambling. The Policy does not restrict a person’s choice to gamble, with the focus of the Policy on preventing harm from gambling.

GENDER IMPACT ASSESSMENT

A gender impact assessment (GIA) has been undertaken as part of this work as this policy is considered to have a direct and significant impact on the Monash community. All people, regardless of gender, are impacted by harm from gambling. This could be harm caused by another person such as a loved one or employee or harm from gambling directly. Population level quantitative data on gambling behaviours of gender diverse and non-binary people is currently not available. Data on gambling behaviour is only broken down by binary ‘male’ or ‘female’ classifications.

The following recommendations have been incorporated into the draft Policy and associated actions, following the GIA:

- Gendered and intersectional data has been strengthened in the Policy Background & Context document
- Commitment to deliver targeted gambling harm prevention strategies and communication tools to engage vulnerable community members
- Continue to promote family violence supports when communicating about gambling harm
- Explore campaign promoting safe non-gambling spaces after hours for people seeking temporary refuge from family violence
- Support awareness and harm prevention of all forms of gambling including bingo

CONCLUSION

The draft *Public Health Approach to Gambling Harm Policy* has been updated based on community and stakeholder engagement. The Policy has been prepared for Council consideration and endorsement.

ATTACHMENT LIST

1. DRAFT POLICY Public Health Approach to Gambling Harm Policy [7.2.5.1 - 8 pages]
2. Background and Context [7.2.5.2 - 12 pages]



DRAFT Public Health Approach to Gambling Harm Policy

PURPOSE

This policy outlines Council's commitment to reducing harm from gambling within the City of Monash and guides Council in its decision making on gambling harm prevention.

The City of Monash has a longstanding commitment to, and leadership role in, the prevention of harm from gambling. This policy presents a formal review to the 'Public Health Approach to Gambling Harm Policy' through which the City of Monash elevated gambling harm to a priority public health issue. The role of a Council is to provide good governance for the benefit and wellbeing of their community. Councils are legislated to develop a Municipal Health and Wellbeing Plan every four years that responds to the local community's health and wellbeing needs. Harm from gambling is a significant concern within Monash and is listed as a priority area within Council's Health & Wellbeing Plan.

The policy seeks to strengthen Council's ongoing commitment to the reduction of gambling-related harm and to maintain Monash's role as a leader and change agent on this public health issue within the local government sector. As the closest level of government to the community, Council is best placed to understand the effects of gambling and to limit the negative impacts of gambling on our community.

GAMBLING HARM

The harms from gambling in all its forms are not limited to financial. Harm also includes effects on physical and mental health, emotional wellbeing and personal relationshipsⁱ. Gambling harm has been defined as 'any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrease to the health or well-being of an individual, family unit, community or population'ⁱⁱ.

In the 2024/2025 financial year \$126,045,998.69 was taken by Electronic Gambling Machines (EGMs, commonly known as pokies) at venues within Monashⁱⁱⁱ. Monash ranked 8th highest in LGAs in Victoria, and highest for the Eastern Metropolitan Region.

The Social Cost of Gambling Report estimates \$14.1 billion in costs associated with gambling in one year including financial impacts, mental health, family breakdown, productivity loss, costs to government, crime including corrections and court and police^{iv}.

Monash City Council recognises gambling as a public health issue that impacts not just individuals but entire families and communities. The public health approach recognises that it is a complex interplay of social, economic and environmental factors that contribute to people's health and potential harm from gambling^v. By applying this lens to gambling, council can take a coordinated, comprehensive approach that works to prevent gambling harm for the whole population, not just individuals experiencing significant harm^{vi}. We recognise that Council's actions play an important role in the approach, but that addressing gambling harm requires collaboration among multiple stakeholders including individuals, lived experience experts, community groups, businesses and all levels of government. Error! Bookmark not defined.

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SCOPE OF POLICY

It is Council's role to seek to improve and promote public health and wellbeing within our municipality. Gambling has been categorised as a legal form of recreation, however, as the closest level of government to community, Council sees the significant impact the harm gambling causes within the community. Council's concern with gambling harm is particularly for those most vulnerable in our community who can least afford to carry the burden of gambling losses. We are concerned about the significant health, social and economic impacts that harmful levels of gambling can have on individuals, families and communities.

EGMs remain among the most impactful form of gambling to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain a primary focus, the scope of this policy focuses on all forms of gambling that can cause harm to the community including (but not limited to):

- Electronic Gaming Machines (EGMs)
- Sports betting
- Community fundraisers that have gambling elements
- Commercial bingo
- Keno
- Horse/dog race wagering
- Casino games
- Online gambling

The policy will be relevant to make decisions relating to:

- Gaming venue and license applications
- Lease and licensing agreements
- Grant applications and funding
- Council-hosted events
- Community fundraisers that have gambling elements, held on council owned or managed land
- Use of Council-owned and managed buildings
- Advertising, signage
- Sponsorships that involve advertising, signage or public endorsement Research and monitoring trends
- Advocacy commitments
- Officer resourcing/time
- Health promotion partnerships, campaigns and events
- Other matters in which gambling harm can be reduced.

Exclusions

Council recognises that community run bingo nights and small-scale raffles can be conducted by sports clubs and community groups in efforts to create social environments or to fundraise for local charities / causes. Council is not looking to prohibit these activities, instead Council wishes to ensure that harm from these activities is minimised and Victorian Gambling and Casino Commission (VGCCC) regulations for community and charitable gambling are upheld.

Council recognises that gambling venues (EGM and TAB operators) can look to give back to the local community through cash donations or in-kind venue hire. Council's Policy does not prohibit sports clubs or community groups/organisations from taking these donations from gambling venues, however arrangements that include promotion of the gambling venue (through logo placement or written endorsements on club communications channels) are considered a breach of the Public Health Approach to Gambling Harm Policy.



This Policy is grounded in evidence and local data; please see Background & Context document for further information on the data that has informed the Policy.

The City of Monash acknowledges the severe impacts on individuals and communities that gambling can cause. If you or someone you know is being impacted by gambling, please reach out to the free support available through Gamblers Help; gamblershelp.com.au or 1800 858 858. Gambling harm and family violence can often coexist, for support with family violence, call 1800RESPECT (1800 737 732).

GUIDING PRINCIPLES

The following principles are the foundation on which Council's commitments to reducing harm from gambling are built upon.

Research

What this means: Council will ensure that gambling harm prevention policies and initiatives are informed by the best available data and evidence.

What we will do: Council will continue to source and maintain accurate data, information and research on all forms of gambling. Where possible Council will participate in and promote gambling harm prevention research to contribute to the evolving evidence base.

Partnerships

What this means: Gambling harm is a complex issue; Council acknowledges the importance of partnerships and collaboration and recognises that a diverse set of stakeholders is integral to addressing harm from gambling.

What we will do:

Council will continue to foster its long-standing partnerships with peak bodies such as the Alliance for Gambling Reform, VLGA and Gamblers Help, lived experience experts and community groups and organisations in the progression of its public health approach to gambling.

Language

What this means: Council rejects 'responsible gambling' rhetoric, which seeks to shift the responsibility to the individual. This language deliberately conceals the predatory conduct of the gambling industry.

What we will do: Council will consciously use evidence based public health language acknowledging the role of the gambling industry in causing gambling harm in all Council communications.

Gender Equity

What this means: Gender and gender norms can impact on a person's experiences or risk of experiencing harm from gambling. There is an evidence-based link between family violence and harm from gambling.

What we will do: A Gender Impact Assessment has been conducted on this policy and Council will continue to assess the impact and effect that this Policy and Council's initiatives may have on people of different genders. We will ensure that Council programs, campaigns and advocacy that address gambling harm are designed considering the needs and experiences of people of different genders and are designed to benefit all.

Intersectionality



What this means: We recognise that people's lives are multi-dimensional and complex and that our response to gambling harm prevention cannot be developed through a singular lens.

What we will do: We will identify and reduce barriers to gambling harm prevention across our community by ensuring that information, communication, services and facilities are accessible, welcoming, safe and inclusive for all people in Monash.

ROLE OF COUNCIL IN GAMBLING HARM PREVENTION

The role of Council in gambling harm prevention can be summarised into four categories:

Plan & Regulate: Council is involved as a Statutory Authority if a venue operator applies for a planning permit for new EGMs to be brought into the City of Monash area. Council must make a decision to either support or refuse a planning permit application based on the policies and a number of decision guidelines as set out in the Monash Planning Scheme. This includes but is not limited to whether there is evidence the new machines will negatively impact the community. Through its Leasing and Licensing Agreements, Council can regulate gambling activities on Council land.

Advocate & Lead: Many regulations on the gambling industry are set by State and Federal agencies. Council has a responsibility to act on the needs and concerns of our community and represent these views to the appropriate governing bodies. Council can lead by example by not taking direct contributions from the gambling industry, and we can continue to elevate gambling harm to the highest level of public prominence through strategic documents such as our Health & Wellbeing Plan.

Fund & Resource: Council can support social initiatives that do not involve gambling through our Monash Community Grants Program (MCGP) or through Council-run programs and events. Council provides community spaces including halls, meeting spaces and sporting pavilions, club rooms and reserves, often at significantly reduced costs for community groups and clubs. Through its Leasing and Licensing Policy, and the Active Monash Sports Club Framework and Lease Agreements, Council can ensure that Council buildings are free from gambling and gambling is not promoted or endorsed by tenants.

Communicate & Build Capacity We will keep the Monash community up to date with local gambling information such as losses, campaigns to reduce harm and any planning permits received for new EGMs. Council plays a pivotal role in building awareness and creating environments that empower communities to learn about and address gambling harms.

PRIORITIES

Plan & Regulate

1.1 When assessing applications for new or transferred EGMs, Council will consider each case individually based on merits and having regard to the Gaming Policy provisions of the Monash Planning Scheme.

1.2 Council will oppose applications for new EGMs licences, increases in EGMs or transfer of EGMs when an application is seen to cause a net social or economic detriment to the local area.

1.3 Council will not support any application for EGMs on Council owned or managed land. All planning decisions and advice relevant to gambling matters will be made with reference to this Policy Statement and the relevant provisions of the Monash Planning Scheme.



1.4 Council will actively discourage and oppose any increase in the number of EGMs, density of EGMs or numbers of gambling venues in any areas with high concentrations of people most at risk of harm from gambling.

1.5 Through lease, hire and licence agreements, Council will implement measures to prevent gambling activities on Council owned/managed land.

1.6 Gambling activity and sponsorships that involve the promotion or advertising of any gambling activity or venue on Council-owned or managed land or in Council facilities is prohibited. Failure by user groups or tenants to comply with this requirement or in breach of lease agreements will result in their use of the facility being jeopardised. This includes but is not limited to advertising or promotion within clubrooms, via newsletters, email banners or social media on club attire or paraphernalia on sports ground fencing or scoreboards. This pertains to all forms of gambling advertising, particularly sports betting, online gambling and EGM venues.

Advocate & Lead

2.1 Council will advocate for a sinking cap on the number of EGMs in Monash and a continuation of the regional cap (regional cap and municipal limits defined in Background & Context document).

2.2 Council will continue to elevate gambling to the highest level of public health prominence in Council strategic documents (including Lease & Licence Policy).

2.3 In partnership with peak bodies including the Alliance for Gambling Reform and VLGA, Council will continue to advocate for regulatory reform to reduce harmful practices in the gambling industry including but not limited to:

- The permanent reduction of gambling room operating hours, with all gambling rooms to be closed between midnight and 10am.
- The elimination of sports betting advertising, particularly during live viewing of sport and targeted online gambling advertising to young people.
- The reduction of the maximum bet on EGMs to \$1 per spin.
- Reforms to the Community Benefit scheme, including a more transparent reporting processes and exclusion of sponsorships and operating costs as claimable community benefits.
- Changes to regulations concerning the design of EGMs to reduce characteristics designed to promote persistent machine use and addiction.
- Changes to EGM licensing requirements to strengthen protections for users against gambling harm.
- The recommendations to address harm from online gambling identified in the 'You win some, you lose more' (Murphy Report) are implemented by the Australian Government.
- The carded gambling system for EGMs involves mandatory precommitment based on thorough evaluation and testing.
- For gambling harm prevention to be identified as a significant public health issue by other levels of government and funding bodies.

2.4 Council will apply a public health approach to harm prevention and focus on collaborative action with State Government, Alliance for Gambling Reform, VLGA, Gamblers Help, peak bodies, community partners and other councils to reduce and prevent gambling harm within Monash.



2.5 Council staff will not attend gambling venues when representing Council unless undertaking statutory functions or duties necessary as part of their role. Reasons to attend a gambling venue include meetings organised by a third party that have strategic ramifications for Council business. Officers need director approval to attend. Councillors, when representing the Council in a formal capacity, are discouraged from attending gambling venues however there may be circumstances where the Councillor determines the event warrants attendance and may exercise their discretion.

Fund & Resource

3.1 Council will resource, promote and seek external funding for a range of non-gambling social, cultural and recreational programs and events as an alternative to gambling in Monash including targeted strategies for those most at risk.

3.2 Council does not provide support (including use of its facilities), funding, publicity or promotion for community groups/organisations/sports clubs that promote, advertise or endorse gambling, particularly EGMs, gambling events/fundraisers on council owned/managed land, sports betting, and online gambling. Promotion of gambling organisations and activities includes on club/group websites, newsletters, social media or paraphernalia. All relevant Council policies and guidelines will align with this policy position. This excludes commemorative events such as ANZAC Day that are held by approved RSL clubs and donations received from gambling venues that do not require public endorsement (e.g. logo placement or social media / email promotions).

3.3 Through the Active Monash Sports Club Framework, Clubs are encouraged to have a Gambling Harm Prevention Policy and actively promote gambling harm prevention to receive greater subsidies and incentives

3.4 Council will not facilitate any gambling activity nor hold any community activity, event, program or social outing in venues that have EGMs or gambling activities.

3.5 All grants distributed by Council (including the Monash Community Grants Program and Discretionary Funds) will not fund activities or events that occur in venues that have EGMs or gambling activities.

3.6 Council will maintain independence from the gambling industry. Council will not accept direct financial contributions from the gambling industry and will not promote community grants or initiatives offered by local EGM venues.

3.7 Council will block and filter internet accounts across council provided equipment and internet (Wi-Fi) to ensure computers are not being accessed for gambling activity by staff and community.

Communicate and Build Capacity

4.1 Council will provide public notice to the community when there is an application for new EGM licences, an increase in or transfer of EGMs, consult where feasible and publish copies of all gambling related submissions it makes on the Council website.

4.2 Council will work with sporting clubs and community groups to increase awareness of the risks of gambling harm and to reduce reliance on the gambling industry (including localised gambling activities)



4.3 Council will encourage alternative activities to gambling and provide support to increase community capacity to reduce harm from gambling through education and events.

4.4 Council facilities will be available for hire, subject to availability, as venues that do not promote gambling or gambling advertising.

4.5 Council will continue to raise awareness of the gambling harm occurring locally by communicating gambling losses, EGM numbers, gambling prevalence, current public health research and health and wellbeing impacts. Targeted and accessible communication for at risk groups including young people, older people, multicultural communities and First Nations communities will be a priority.

4.6 Council will provide and partner on opportunities for community and staff to learn about gambling issues, prevention and help seeking.

4.7 Council will promote Gambler's Help and family violence support services in all communications regarding gambling harm.

IMPLEMENTATION AND REVIEW

This Policy Statement will inform and be applied to all relevant Council planning, policy, programs and decision-making. The Statement is to have whole-of-Council ownership.

Council will review this Policy Statement every two years or as necessary when evidence base or legislation changes.



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- ⁱ VRGF, 2016, Fact sheet 2: The seven dimensions of gambling harm, Assessing gambling-related harm in Victoria: a public health perspective <https://responsiblegambling.vic.gov.au/documents/166/Harm-study-Fact-sheet-2-Seven-dimensions-of-gambling-harm.pdf>
 - ⁱⁱ Langham et al., 2016, p4. Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms.
 - ⁱⁱⁱ VCGRLGCCC website, Monthly LGA EGM Statistics, Monash. Victorian Commission for Gambling and Liquor Regulation: Monthly LGA EGM Statistics (vcglr.vic.gov.au)
 - ^{iv} Social costs of gambling to Victoria 2023 | Department of Justice and Community Safety Victoria
 - ^v VRGF 2015, Using a public health approach in the prevention of gambling-related harm, background paper. <https://responsiblegambling.vic.gov.au/documents/21/using-a-public-health-approach-in-the-prevention-of-gambling-related-harm.pdf>
 - ^{vi} Productivity Commission 2010, Gambling, Report no. 50, Canberra, page 149 'The public health model'. <https://www.pc.gov.au/inquiries/completed/gambling-2010/report/gambling-report-volume1.pdf>



Public Health Approach to Gambling Harm

Background & Context document

BACKGROUND

The harms from gambling in all its forms are not limited to financial, and include harms to physical and mental health, as well as emotional and relationship harmsⁱ. Gambling harm affects not only the person gambling but also their family, friends, employers and community.

Participation in various types of gambling and experiences of gambling harm is associated with age and gender. Men and particularly young men are considered at-risk populations for gambling harm, especially from sports betting, Electronic Gambling Machines (EGMs commonly known as pokies) and casino gambling. Women that gamble are most associated with EGMs, bingo and lottery/raffles. Women and people that spoke a language other than English at home were more likely to experience harm from other people's gambling.ⁱⁱ A study by Australia's National Research Organisation for Women's Safety (ANROWS) showed that for women in intimate partner violent relationships, gambling by either the male perpetrator or the female victim intensified the abuse they sufferedⁱⁱⁱ. Women described that increased gambling resulted in increases in their partner's controlling behaviours, anger, physical and sexual abuse^{iv}.

Although progress in methodology in the Victorian Population Gambling and Health Survey (VPGHS) used to collect gender has been made, the number of responses for people that identify as non-binary or self-prescribed genders is too small to be included in bivariate analysis, meaning population level data analysis on gambling harm is binary and does not capture non-binary and gender diverse people. Refer to Appendix A for further gendered data on gambling.

Financially, gambling harm from EGMs is substantial; of the \$7.4 billion gambling expenditure in Victoria in 2024-25, \$3.1 billion (40%) was gambling machine expenditure. In the 2024/2025 financial year \$126,045,998.69 was taken by EGMs at venues within Monash^v. Monash ranked 8th highest in LGAs in Victoria, and highest for the Eastern Metropolitan Region^{vi}.

The Social Cost of Gambling Report estimates \$14.1 billion in costs associated with gambling including financial impacts, mental health, family breakdown, productivity loss, costs to government, crime including corrections and court and police.^{vii}

The features and design of EGMs has been shown to influence people's decision-making and can contribute to people spending more time and losing more money when using EGMs. EGM characteristics including sounds, music and lights are designed to draw people in and stimulate feelings of pleasure and enjoyment^{viii}. There is strong evidence that shows near misses (where it appears the losing result was one digit / line / symbol off a win) and losses disguised as wins (where the amount 'won' is less than the amount bet) encourage EGM users to persist, EGM users report feeling like a win is close^{viii}. Free spins and jackpots also have strong evidence showing the link between these characteristics and gambling harm^{viii}. Currently the maximum bet one can place on an EGM per 'spin' is \$5, with a minimum spin rate of 2.14 seconds, users can potentially lose \$8.4k per hour^{ix}. Reforms have been announced to change the minimum spin rate to 3 seconds on new machines, decreasing the maximum losses per hour to \$6k (not accounting for payouts).

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The City of Monash has a key focus on reducing gambling harm related to EGMs, however there is growing concern about the impact that sports betting and online gambling is having on our community, in particular to young people. Sports betting losses are continuing to grow significantly with advances in technology, from \$640m lost to wagering in 2005-2006 to \$2.5b lost to wagering in Victoria in 2022-2023^{vi}. It should be noted that a point of consumption tax was introduced in 2019, meaning figures for wagering were skewed prior to this date. The tax was previously applied at the point of supply, based on the operating company's address (in most cases, Northern Territory).

Advertising of gambling products and particularly sports betting is an area of concern for our community^x. A recent study found that in 2021, there was an average of 948 gambling ads per day on Australian free-to-air TV, which is a 253% increase since 2016^{xi}. Another study conducted by Deakin University found that 75% of children 8-16 years old could recall at least one sports betting brand^{xii}. Results from the most recent Victorian Population Gambling and Health Survey (VPGHS) show people who experience harm from gambling are more aware of gambling advertising than those who don't experience harm, although awareness for all Victorians is high with 8 out of 10 people reporting being exposed to gambling advertising in the last weekⁱⁱⁱ.

Online gambling continues to grow in popularity, making gambling easier and more accessible than ever. The rise of online games and gambling themes within online games (such as loot boxes) has raised e-safety concerns that gambling is being normalised for young people^{xiii}. Games that simulate gambling activity may not always offer opportunities to spend money, but groom young participants with actions that look and sound the same as real gambling.^{xiiii} Online-only gambling (including loot boxes, eSports, fantasy sports betting) have been associated with high rates of problem gamblingⁱⁱⁱ.

The cost-of-living crisis presents significant challenges to the community, especially for those on low incomes. The rising cost of living means disposable income is limited and gambling losses have the potential to cause significant harm. The 2023 VPGHS shows that whilst gambling participation levels have reportedly dropped, the proportion of people that do gamble and experience harm has increased (13% of people that gamble reported experiencing harm from gambling, up from 9.6% in 2018-19)ⁱⁱⁱ. The VPGHS acknowledges response and participation bias may have impacted the results, likely underestimating the participation in gambling and/or the harm experienced. Victorian gambling expenditure data demonstrate that despite the cost-of-living crisis, gambling expenditure has increased from \$6.3b (2021-2022) to \$7.4b (2023-2024)ⁱⁱⁱ.

GAMBLING AS A PUBLIC HEALTH PRIORITY

It is the position of Monash City Council that gambling is a public health issue which impacts not just individuals but entire families and communities. The public health approach recognises that it is a complex interplay of social, economic and environmental factors that contribute to people's health and potential harm from gambling^{xv}. By applying a public health lens to gambling, it allows for a coordinated, comprehensive approach which works to prevent gambling harm for the whole population not just individuals experiencing significant harm from gambling^{xvi}. We recognise that Council's actions play an important role in the approach and that multiple stakeholders must come together on this important issue including individuals, community groups, businesses and government at all levels^{xv}.

There are many factors that play a significant role in this public health issue including social norms, public awareness of gambling issues, accessibility of gambling (both venues and online options), targeted advertising, legislation around product design, venue operations and advertising, the EGM application process and the concentration of EGMs in vulnerable areas.



Gambling has become increasingly normalised in Australian society. Gambling advertising and availability of gambling (including online and gambling at local bars and taverns) contributes to the normalisation of gambling within Australian culture^{xvii}. Public health research shows people are more likely to engage in the consumption of harmful products when they perceive that the behaviours are normal, socially accepted and culturally endorsed^{xiii-xix}.

EGM venues with hotel licences are taxed at least 8.33% of their EGM gambling revenue which goes directly to the State Government's Community Support Fund. However, an EGM venue, with a club licence which generates EGM gambling revenue such as an RSL, Mulgrave Country Club, Leighoak or Vegas on Waverley Gardens are required by legislation to give an equivalent of at least 8.33% of the venue's net EGM gambling revenue to community purposes or activities each year^{xx}. This can be in the form of donations, gifts of sponsorship of local causes, community groups or sporting clubs (Class A contributions), and often venues choose to sponsor sporting clubs. Venues typically contribute significantly more funds to eligible operating costs such as staff salaries and refurbishment of their own venue (Class 'B' contributions) than contributions to community groups (Class 'A' contributions). For example, in Monash in 2023-24, Club venues declared \$3.9m in 'Class A' contributions including gifts/donations to sporting clubs and local groups, and \$6.2m in 'Class B' contributions including operating costs and capital improvements.^{xx} As noted by the Victorian Gambling and Casino Control Commission (VGCCC), harm experienced by one person is not lessened by any associated benefits accruing to other people.^{xxi}

The detrimental public health impact of EGMs on families and communities outweighs the required financial contribution made to community groups or clubs. This policy does not seek to stop such contributions but prohibits the gambling venue and its facilities and activities from being promoted by those groups or clubs operating from Council-owned or managed land or in Council facilities that receive the contribution.

CONSULTATION PROCESS

During the development of this policy, Council undertook extensive research and consultation with the Monash community and stakeholder partners. The guiding principles and priorities listed in the policy are a direct result from the community consultation, data collection and research conducted.

Council undertook a wide range of activities to capture the voice of our community on the role of Council in gambling harm prevention. Methods included a community survey, advisory committee meetings and a joint advisory committee workshop, 1:1 interviews with community stakeholders, and internal consultation, while gambling harm prevention questions were asked as part of the Community Satisfaction Survey. The draft Policy and revised Policy was available for community feedback for a period of 6 weeks (September-October 2022 and January – February 2026 respectively).



APPENDIX A – CURRENT STATISTICS AND RESEARCH

Gendered statistics

According to the most recent VPGHS data, just over half (53.3%) of the Victorian adult population participated in gambling in the past 12 months. Men (56.1%), particularly young men, were more likely than women (51.0%) to participate in gambling in the past year.

Men, especially young men (18-24 years old) participated in multiple gambling types (gambling on 4+ gambling activities). Men who gambled spent a much higher amount of money, on average, than females who gambled (\$4,191 and \$706, respectively)ⁱⁱⁱ.

Women were less likely to participate in high-risk gambling activities including casino table games, racing and sports, and more likely to participate in gambling activities usually associated with low risk of harm including buying scratch and raffle tickets. However, women, particularly older women, were more likely to participate in bingo than men, and for the first time, bingo was identified as a gambling type highly associated with gambling harm. Men and women were equally as likely to participate in EGM gambling, which is a high-risk gambling type for harm causedⁱⁱⁱ.

Men are significantly more likely than women to be identified in the problem gambling category (using the Problem Gambling Severity Index), higher problem gambling severity was associated with male gender, younger age, living outside Melbourne, speaking a language other than English, not having finished high school, not living in a couple household, participating in a greater number of gambling activities and higher gambling frequencyⁱⁱⁱ.

Women were more likely to experience harm from someone else's gambling; 'affected others' were more likely to be females, aged 25 to 44 years, speak a language other than English at home, not have finished Year 12, live in single-parent households, be unemployed and be more likely to report personal annual income between \$20,800 and \$41,599ⁱⁱⁱ.

As noted in the background section, population level data for gambling harm is not available for non-binary and gender diverse peoples. The studies that have looked at LGBTIQ+ gambling experiences (small sample size, qualitative studies), have concluded that LGBTIQ+ communities participate less in gambling activities than cis/het respondents^{xvii}. Feelings of loss of control and stigma/shame are risk factors for problem gambling among LGBTIQ+ communities and strong support networks are protective factors^{xviii}.

Priority cohorts

Population level data identify certain cohorts at higher risk of gambling harm than others. Young people, particularly young men, older people, people that speak a language other than English at home and people experiencing financial disadvantage are regularly identified as groups more at risk of experiencing harm from gamblingⁱⁱⁱ.

Population studies are not typically able to accurately describe experiences of cohorts where response rates do not provide the statistics to analyse/compare between cohorts. Smaller scale studies are required to understand the experiences of cohorts including First Nations and specific cultural groups.

A Victorian study initiated by the Victorian Aboriginal Health Service (VAHS), looked at the experiences of 89 Aboriginal adult community members. The study found 84% of respondents were experiencing harm from their own gambling, and more likely for men than women and those over 50 years old. 23% of respondents had



sought professional help for gambling harm, many instead relied on themselves or friends or family for support. The study concluded that in order to reduce harm from gambling more accessible Aboriginal-specific gambling services were required, de-stigmatisation of gambling within society, cultural safety and leadership and decreased gambling product availability and advertising^{xxiii}.

Australia

Total gambling expenditure in Australia was \$32.2 billion in 2023-2024. Per capita gambling expenditure in Australia was \$1.5 billion and total electronic gambling machine expenditure in Australia was \$16.3 billion^v. Unfortunately, Australia has the highest per capita losses in the world^v. Almost three-quarters of Australians report spending money on gambling products. Lotteries/scratchies were the most common, followed by horse / sports betting and EGMs^{xxiv}.

Victoria

More than half of adult Victorians (53.3%) have participated in some form of gambling in the past twelve months^{iv}. Despite general population participation in gambling activities appearing to decrease, the rate of people categorised as experiencing problem gambling has remained the same as previous years, meaning a larger proportion of people that gamble are gambling at at-risk levels^{iv}. Please note, sampling methodology has changed for the VPGHS, and this may have impacted results.

City of Monash

In January 2020, City of Monash ran a 'Perceptions about gambling and gambling-related harms' survey within the community. These results demonstrated that:

55% of survey respondents strongly agreed, and a further 16% agreed that 'The negative impact to the community from gambling products outweighs the benefits'.

49.5% of respondents believe that EGMs are 'Very Harmful' to the local community, 26.5% believe they are 'Harmful', with 24% believing they are 'Not at all harmful'.

Out of the participants who visited a venue with EGMs within the City of Monash, 44% attended to enjoy the food or drink, 31% went to meet or socialise with friends, and 11% went to play the EGMs.

26% of participants used the EGMs once at a venue, for 18% of participants it wasn't the main reason for their visit.

APPENDIX B – CURRENT MONASH VENUES

Venue name	\$ taken July 2024-June 2025	# of EGMs	Owned by
Club licensed venues			
Vegas at Waverley Gardens	\$13,425,179.86	75	The Melbourne Racing Club
Mulgrave Country Club	\$12,722,314.80	105	Mulgrave Country Club
MVRC Leighoak Club	\$9,897,271.90	92	Moonee Valley Racing Club Inc.
Waverley RSL	\$5,767,388.77	67	Waverley RSL Sub-Branch Inc.
Clayton RSL	\$4,905,083.27	71	Clayton RSL Sub-Branch Inc.
Hotel licensed venues			
Century City Walk	\$12,878,889.51	65	ALH Group Pty Ltd.
Village Green Hotel	\$12,631,236.57	78	ALH Group Pty Ltd.
Matthew Flinders Taverner	\$12,302,506.88	75	ALH Group Pty Ltd.
The Vale Hotel	\$8,574,695.48	55	ALH Group Pty Ltd.
Mountain View Hotel	\$8,842,057.96	62	ALH Group Pty Ltd.
Clayton Hotel	\$6,143,403.05	35	L'Unico Pty. Ltd.
Oakleigh Junction Hotel	\$4,799,415.12	45	ALH Group Pty Ltd.
Monash Hotel	\$4,938,008.38	44	ALH Group Pty Ltd.
Wheelers Hill Hotel	\$3,917,463.96	40	ALH Group Pty Ltd.



Foresters Arms Hotel	\$4,301,083.18	46	Castello Forester's Arms Hotel Pty Ltd.
TOTAL	\$126,045,998.69	955	



APPENDIX C –MUNICIPAL CAPS AND REGIONAL LIMITS IN MONASH

In Victoria, all local government areas have municipal limits on the number of EGMs within the municipality. Some areas, like Monash also have regional caps which provide further limit on the number of EGMs permitted within a vulnerable area.

As per the current gambling machine regional caps and limits,^{xxv} the maximum permissible number of gambling machine entitlements under which gambling may be conducted in the City of Monash is 1,393. Monash is one of few local government areas where a regional cap AND a municipal limit applied.

As of March 2025, City of Monash has a regional cap determined by the VGCCC that has a maximum permissible number of gambling machine entitlements of 616. This area includes:

Ashwood	Oakleigh
Chadstone	Oakleigh East
Clayton	Oakleigh South
Hughesdale	Mulgrave
Huntingdale	Notting Hill

Remaining suburbs within Monash are limited by a municipal limit of 777 gambling machine entitlements. The municipal limit is calculated at a ratio of 10 gambling machines per 1000 adults. If population rises, the limit may increase^{xxv}. Areas within Monash covered by the municipal cap include:

- Glen Waverley
- Mount Waverley
- Wheelers Hill



APPENDIX D – GLOSSARY

Casino games – gambling activities found in a casino, often referred to as casino table games e.g. blackjack, roulette and poker.

Commercial bingo – organised bingo sessions conducted by a licensed commercial bingo operator. Bingo is a form of gambling where random numbers are drawn, individual players have different number sheets, bingo is won when the player has all numbers in a grid ticked off. Newer technology is now available, digitising the bingo sheets on personal electronic tablets (PETS), enabling many more bingo sheets to be played concurrently.

Community fundraisers – for the purpose of this policy, community fundraisers are those which have gambling elements, e.g. lotto, poker nights etc. Community fundraisers with gambling elements should consider gambling harm prevention measures including informed decision making, communication regarding triggers, support available, limited buy-in and prize pools. The VGCCC has regulations for community and charitable gambling (e.g. raffles, bingo), organisations are encouraged to check with the regulator.

Horse/dog race wagering – a form of gambling that entails placing a wager or a bet on the outcome of a horse, harness or dog race. This can occur online, through bookmaker or a TAB outlet – hotel, club and agency.

Electronic Gambling Machines (EGMs) - commonly known as pokies or poker machines, are computers which when activated, simulate reels that appear to spin, if the symbols shown match, prizes are awarded. EGMs are designed to attract people to them and keep users on the machine for as long as possible. EGMs are one of the most harmful gambling types, taking billions of dollars from Australians every year.

Gambling expenditure or 'loss' data – the amount of money each form of gambling takes from the community.

Gambling – in accordance with the Gambling Regulation Act, gambling is described as 'any activity in which a) a prize of money or something else of value is offered or can be won; and, b) a person pays or stakes money or some other valuable consideration to participate; and c) the outcome involves or is presented as involving, an element of chance.'

Gambling harm - defined as 'any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrease to the health or well-being of an individual, family unit, community or population'. Low-income earners are significantly more likely to experience harm from gambling

Keno – a form of gambling that is a rapid draw lottery determined by a random number generator.

Municipal limit – the number of EGMs allowed within a municipality, as set by the Ministerial Order in 2017. In Monash, this is 777 EGMs in the areas not covered by the regional cap.

Online gambling – refers to all gambling conducted online, usually via phone or computer/tablet. Often incorporates sports or race betting. Online gambling can include gambling within computer games e.g. lootboxes, skins etc.

Regional cap – a limit on the number of EGMs allowed in a distinct area, often categorised as high risk for gambling harm. In Monash, this is 616 EGMs in the areas of Ashwood, Chadstone, Clayton, Hughesdale, Huntingdale, Oakleigh, Oakleigh East, Oakleigh South, Mulgrave, Notting Hill.



Sports betting - a form of gambling that entails placing a wager, also known as a bet, on the outcome of a sporting event. Bets can be placed online, in person via a bookmaker or in a TAB outlet. Sports betting has become increasingly popular since the introduction of smartphones and the advertising and marketing by sports betting companies to normalise sports betting. Losses to sports betting have increased dramatically in the recent years.

Victorian Gambling and Casino Control Commission (VGCCC) – the independent regulator of Victoria’s gambling industry. The VGCCC has regulatory functions and powers such as the distribution of licenses and permits for all forms of gambling in Victoria, monitoring and enforcement of gambling protections.



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