

## 7.2.3 DRAFT PUBLIC HEALTH APPROACH TO GAMBLING HARM POLICY

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### RECOMMENDATION

That Council endorses the draft *Public Health Approach to Gambling Harm Policy* for the purposes of public exhibition and community feedback for a period of four (4) weeks starting in February 2026.

### INTRODUCTION

Council's draft *Public Health Approach to Gambling Harm Policy* has been updated to reflect recent changes to the broader gambling environment and adopts a preventative approach to responding to gambling harm in our community.

The draft Policy has been informed by a review of the existing policy, current data trends and internal stakeholder engagement. The Policy identifies four broad priority areas where Council can address gambling-related harm in the Monash community.

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.

### COUNCIL PLAN STRATEGIC OBJECTIVES

The Policy addresses the strategic objectives within the Council Plan under 'a healthy safe and connected' community and the Public Health & Wellbeing Plan's Priority 2: Building a Respectful and Safe Community, Objective 2.3- Reduce harm from gambling, tobacco and alcohol. By addressing gambling harm through targeted initiatives and policy, we will tackle a major public health issue facing Monash. Family violence, mental health and relationship breakdown can also be exacerbated by gambling.

### BACKGROUND

Harm from gambling is a major public health issue in Australia, with the most recent data estimating that \$31 billion was taken through legal forms of gambling, representing the largest per capita losses in the world. In Monash, \$126 million was taken by electronic gaming machines (EGM) machines in the 2024-25 financial year, placing Monash in the top 8 LGAs in the state for EGM losses. EGMs remain among the most impactful forms 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 policy broadens its scope to cover all gambling activity that causes harm.

Gambling harm is not limited to financial harm, it may also include harm to mental and physical health, family and relationships, work/study and cultural harm. Harm from gambling can be felt not just by the person engaging in gambling but their friends, family, colleagues, employers and community.

Gambling has become increasingly normalised in Australian society. Gambling advertising and availability of gambling (including online and gambling at local pubs) contributes to the normalisation of gambling within Australian culture. Public health research highlights that 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. Council seeks to break this norm and exposure through the facilities and programs we provide by not allowing gambling or gambling advertising within Council facilities or when using Council resources.

Monash Council is regarded as a leader in gambling harm prevention through its strong policy and innovative initiatives such as our *You're Reading This Ad* poster campaign and sponsorship forum hosted in partnership with Hawthorn Football Club and Love the Game. This policy seeks to build upon that history and the foundation of the previous policy.

## DISCUSSION

The Policy outlines the commitments Council will make to prevent harm in Monash. The revised Policy includes updates to the evidence in response to emerging issues such as the cost-of-living crisis, new Victorian Population Gambling and Health Survey data being published, simplifying language to enable better community understanding and stronger alignment with the Sports Club Framework to support implementation of the Policy.

Changes to Council's advocacy commitments reflect both the evolving needs of the Monash community and recent reforms in the gambling sector. These include changes to the spin rate of new EGMs (slowing the speed at which the game can be played) and new requirements for standardised operating hours across all gaming venues.

Whilst carded gambling on EGMs has been formally announced, Council's experience as a trial site has shown that further advocacy is required to ensure these reforms genuinely reduce harm. This includes introducing measures such as mandatory binding loss limits that require players to set a spending limit in advance. Although these developments represent progress, further advocacy and broader sector reform are still required. Council is well positioned to advise regulators and policymakers on the gambling-related harms affecting the Monash community and the need for stronger, evidence-based protections.

Officers conducted a Sponsorship Review as part of the Policy refresh. The Sponsorship Review demonstrates that Council's Public Health Approach to Gambling Harm Policy is effectively reducing gambling exposure in local sport. Only 8% of Monash-based clubs were found to have current gambling sponsorships, down from 25% in 2022. This is reflective of strong engagement between Active Monash and local clubs. While some hotel-licensed EGM and TAB venues continue to sponsor clubs, based on CBS data, overall community funding from club-licensed EGM venues has remained stable. Emerging evidence on sports betting highlights ongoing risks in relation to

gambling harm and emphasises the importance of clear Policy definitions to protect those in the community who are most at risk.

The policy is based on the role of local government in gambling harm prevention. These include categories such as:

- **Plan & Regulate:** Council is involved if a venue operator applies for new EGMs to be brought into the City of Monash area. Council can accept the planning permit or oppose it based on 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 receiving 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 and Leasing & Licensing Policy.
- **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 sports pavilions, club rooms and reserves, often at significantly reduced costs for community groups and clubs. Through its Leasing and Licensing Policy, 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.

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:

- An identified need to provide alternative spaces and programs to the community to encourage non-gambling behaviour and increase social connection opportunities.
- An opportunity to leverage Council's existing touchpoints within the community to address gambling harm e.g. through community grants, leasing agreements, sports clubs and community groups.
- A greater focus on the broader gambling environment, including recognising potential harm caused by community fundraisers that have strong 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 and their connection to the gambling industry.

- Clearer wording regarding Council not providing support or resources to community groups and clubs that actively promote gambling, leveraging the Sports Club Framework.
- Consideration of Council's broader sphere of influence beyond the assessment of applications for new 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.

It is proposed to seek community feedback on the draft policy for a period of four weeks.

The document will be published on the Shape Monash website and circulated to Council's Advisory Committees, industry stakeholders and community for feedback. Once the community consultation is complete, officers will prepare a final version of the policy considering any feedback and bring the final policy to Council for consideration.

## **FINANCIAL IMPLICATIONS**

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

## **POLICY IMPLICATIONS**

Changes to the Policy do not create major policy implications.

## **CONSULTATION**

It is proposed that the draft *Public Health Approach to Gambling Harm Policy* be placed on public exhibition for a period of four weeks from February 2026.

Public exhibition will include:

- Copy of the draft Policy on Council's Shape Monash website.
- A copy sent to all of Council's advisory committees.
- A copy sent out to all local EGM and gambling venue operators.
- A copy sent to various stakeholders (e.g. community groups, sports clubs, Gamblers Help and community health organisations).
- A copy sent to peak bodies and networks including Clubs Victoria, the Alliance for Gambling Reform and the Victorian Local Governance Association.

## **SOCIAL IMPLICATIONS**

The *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 and older women.

## **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**

Because this policy is considered to have a direct and significant impact on the Monash community, a gender impact assessment (GIA) has been undertaken as part of this work. 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 is not available on behaviours of gender diverse and non-binary people; data on gambling behaviour is only broken down by 'male' or 'female' classifications.

As a result of the GIA, the following recommendations have been incorporated into the draft Policy and associated actions:

- 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 revised *Public Health Approach to Gambling Harm Policy* has been prepared for Council consideration and community consultation.

The draft Policy reflects Council's commitment to improving the lives of the Monash community through the prevention of harm caused by gambling. It is anticipated that the final *Public Health Approach to Gambling Harm Policy* will be referred to Council for consideration after amendment from public comment.

## **ATTACHMENT LIST**

1. DRAFT Public Health Approach to Gambling Harm Policy (1) [**7.2.3.1** - 7 pages]
2. Background and Context doc [**7.2.3.2** - 12 pages]
3. Summary changes made community facing [**7.2.3.3** - 10 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 relationships<sup>i</sup>. 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'<sup>ii</sup>.

In the 2024/2025 financial year \$126,045,998.69 was taken by EGMs at venues within Monash<sup>iii</sup>. 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 including financial impacts, mental health, family breakdown, productivity loss, costs to government, crime including corrections and court and police<sup>iv</sup>.

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<sup>v</sup>. 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<sup>vi</sup>. 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, 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
- 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.

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 support available through Gamblers Help; [gamblershelp.com.au](http://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 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 Murphy Report are implemented by the Australian Government.
- The carded gambling system for EGMs involves mandatory precommitment based on thorough evaluation and testing.

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.

3.3 Through the Active Monash Sports Club Framework, Council will prioritise subsidised leases for organisations that have no affiliation with gambling or gambling organisations.

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 (WiFi) 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 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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<sup>i</sup> 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>

<sup>ii</sup> Langham et al., 2016, p4. Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms.

<sup>iii</sup> VCGRLGCC website, Monthly LGA EGM Statistics, Monash. Victorian Commission for Gambling and Liquor Regulation: Monthly LGA EGM Statistics ([vcgcr.vic.gov.au](http://vcgcr.vic.gov.au))

<sup>iv</sup> Social costs of gambling to Victoria 2023 | Department of Justice and Community Safety Victoria

<sup>v</sup> 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>

<sup>vi</sup> 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 harms<sup>i</sup>. 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, EGMs 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.<sup>ii</sup> 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 suffered<sup>iii</sup>. Women described that increased gambling resulted in increases in their partner's controlling behaviours, anger, physical and sexual abuse<sup>iv</sup>.

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 2023-24, \$3 billion (40%) was gambling machine expenditure<sup>v</sup>. In the 2024/2025 financial year \$126,045,998.69 was taken by EGMs at venues within Monash<sup>vi</sup>. Monash ranked 8th highest in LGAs in Victoria, and highest for the Eastern Metropolitan Region<sup>vi</sup>.

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.<sup>vii</sup>

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<sup>viii</sup>. 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<sup>viii</sup>. Free spins and jackpots also have strong evidence showing the link between these characteristics and gambling harm<sup>viii</sup>. 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<sup>ix</sup>. Reforms have been announced to change the minimum spin rate to 3 seconds on new machines, decreasing the maximum losses per hour to \$6k.

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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<sup>vi</sup>. 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<sup>x</sup>. 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<sup>xii</sup>. Another study conducted by Deakin University found that 75% of children 8-16 years old could recall at least one sports betting brand<sup>xiii</sup>. 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 week<sup>xii</sup>.

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<sup>xiii</sup>. 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.<sup>xiii</sup> Online-only gambling (including loot boxes, eSports, fantasy sports betting) have been associated with high rates of problem gambling<sup>xiii</sup>.

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)<sup>iii</sup>. 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)<sup>iii</sup>.

#### **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<sup>xv</sup>. 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<sup>xvi</sup>. 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<sup>xv</sup>.

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<sup>xvii</sup>. 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<sup>xviii-xix</sup>.

EGM venues with hotel licences are taxed 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<sup>xx</sup>. 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.<sup>xx</sup> 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.<sup>xxi</sup>

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)<sup>iii</sup>.

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 caused <sup>iii</sup>.

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 frequency<sup>iii</sup>.

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 \$41,599<sup>iii</sup>.

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 LGBTIQA+ gambling experiences (small sample size, qualitative studies), have concluded that LGBTIQA+ communities participate less in gambling activities than cishet respondents<sup>xxii</sup>. Feelings of loss of control and stigma/shame are risk factors for problem gambling among LGBTIQA+ communities and strong support networks are protective factors<sup>xxii</sup>.

### 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<sup>v</sup>. Unfortunately Australia has the highest per capita losses in the world<sup>v</sup>. Almost three-quarters of Australians report spending money on gambling products. Lotteries/scratchies were the most common, followed by horse / sports betting and EGMs<sup>xxiii</sup>.

### Victoria

More than half of adult Victorians (53.3%) have participated in some form of gambling in the past twelve months<sup>iv</sup>. 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<sup>iv</sup>. 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 2023-June 2024	# 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,<sup>xxiv</sup> the maximum permissible number of gambling machine entitlements under which gambling may be conducted in the City of Monash is 1393. 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<sup>xxiv</sup>. 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 or through bookmaker.

**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. 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.

## APPENDIX E – REFERENCES

<sup>i</sup> 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>

<sup>ii</sup> Langham et al., 2016, p4. Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms.

<sup>iii</sup> Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlishaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, Victorian population gambling and health study 2023, State Government of Victoria, Melbourne. <https://ftp.justice.vic.gov.au/justice-system/safer-communities/gambling/victorian-population-gambling-and-health-study-2023>

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

<sup>v</sup> Queensland Government Statistician's Office, Queensland Treasury, Australian Gambling Statistics, Summary tables, 39th edition, 2023-2024. <https://www.qgso.qld.gov.au/issues/2646/australian-gambling-statistics-40th-edn-1998-99-2023-24-summary-tables-2023-24.pdf>

<sup>vi</sup> VGCCC website, Monthly LGA EGM Statistics, Monash. [Victorian Commission for Gambling and Liquor Regulation: Monthly LGA EGM Statistics \(vcgir.vic.gov.au\)](https://www.vcgir.vic.gov.au)

<sup>vii</sup> Department of Justice and Community Safety (2023) [Social costs of gambling to Victoria 2023 | Department of Justice and Community Safety Victoria](https://www.djcs.vic.gov.au/soccosts)

<sup>viii</sup> Rockloff, M., Thorne, H., Goodwin, B., Moskovsky, N., Langham, E., Browne, M., Donaldson, P., Li, E. & Rose, J. (2015). EGM environments that contribute to excess consumption and harm. Victoria, Australia: Victorian Responsible Gambling Foundation.

<sup>ix</sup> Schottler Consulting (2019) *Literature review of the impact of EGM characteristics on gambling harm*. Commissioned by the NSW Responsible Gambling Fund.

<sup>x</sup> City of Monash, Gambling Harm Prevention Policy - Community Consultation Report, 2022 (unpublished)

<sup>xi</sup> VRGF website, News and media. [948 gambling ads daily on Victorian free to air TV in 2021, up 253% from 2016 \(responsiblegambling.vic.gov.au\)](https://responsiblegambling.vic.gov.au)

<sup>xii</sup> Thomas, SL, Pitt, H, Bestman, A, Randle, M, Daube, M, Pettigrew, S 2016, Child and parent recall of gambling sponsorship in Australian sport, Victorian Responsible Gambling Foundation, Melbourne.



<https://responsiblegambling.vic.gov.au/resources/publications/child-and-parent-recall-of-gambling-sponsorship-in-australian-sport-67/>

<sup>xiii</sup> E-Safety Website, Online Gaming. <https://www.esafety.gov.au/parents/big-issues/gaming>

<sup>xv</sup> 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>

<sup>xvi</sup> 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>

<sup>xvii</sup> Marko S, Thomas S, Pitt H, Doube M, 2022, "Aussies love a bet": Gamblers discuss the social acceptance and cultural accommodation of gambling in Australia, Australian and New Zealand Journal of Public Health, vol. 46, no. 6

<sup>xiii</sup> Cunningham JA, Neighbors C, Wild TC, Humphreys K. Normative misperceptions about alcohol use in a general population sample of problem drinkers from a large metropolitan city. *Alcohol Alcohol*. 2012;47(1):63-6.

<sup>xix</sup> Wood L, Letcher T, Winstanley M. Chap 5.24. The Profound Effects of the Denormalisation of Smoking. In: Greenhalgh EM, Scollon MM, Winstanley MH, editors. *Tobacco in Australia: Facts and Issues*

<sup>xx</sup> VGCCC website, Community Benefit Statements. <https://www.vgccc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/your-obligations/community-benefit>

<sup>xxi</sup> VGCCC website, [Our position on gambling harm | vgccc.vic.gov.au](https://www.vgccc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/your-obligations/community-benefit)

<sup>xxii</sup> Rachel Bush, Alex M. T. Russell, Andrea Waling, Petra K. Staiger, and Nicki A. Dowling 2021, *Examining risk and protective factors for the development of gambling-related harms and problems in Victorian LGBTIQ+ communities*, Melbourne.

<sup>xxiii</sup> Australian Gambling Research Centre. (2023). *Gambling participation and experience of harm in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.

<sup>xxiv</sup> VGCCC website: Poker machine entitlements

[Poker machine entitlements | vgccc.vic.gov.au](https://www.vgccc.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/your-obligations/community-benefit)

Theme	Change #	Previous wording (where relevant)	Changes made	Reason for changes
Streamlining/ readability of the Policy	1		Removal of the Context, Background, Gambling as a Public Health Priority and Consultation Process sections and Appendices from the Policy document; creation of a new 'Background & Context' document intended as a complementary document to be presented alongside the Policy.	Feedback received internally called for a streamlined Policy to improve readability and focus on Policy statements.
Streamlining/ readability of the Policy	2	EGMs remain the most impactful to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain the main focus, the policy looks to cover all gambling activity such as online gambling etc. Council recognises that bingo and raffles can be conducted by community groups in efforts to create social environments or to fundraise for local charities / causes. City of Monash is not looking to prohibit these activities, instead Council wishes to ensure that harm from these activities is minimised.	<p>EGMs remain <b>among</b> the most impactful <b>form of gambling</b> to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain <b>a primary</b> focus, the scope of this policy focuses on all forms of gambling that can cause harm to the community including (but not limited to):</p> <ul style="list-style-type: none"> <li>• Electronic Gaming Machines (EGMs)</li> <li>• Sports betting</li> <li>• Community fundraisers that have gambling elements, e.g. lotto, poker nights etc</li> <li>• Commercial bingo</li> <li>• Keno</li> <li>• Horse/dog race wagering</li> <li>• Casino games</li> <li>• Online gambling</li> </ul> <p>The policy will be relevant to make decisions relating to:</p> <ul style="list-style-type: none"> <li>• Gaming venue and license applications</li> <li>• Lease and licensing agreements</li> <li>• Grant applications and funding</li> <li>• Council-hosted events</li> </ul>	Provides clearer scope of the Policy and Council's priorities for gambling harm prevention.

			<ul style="list-style-type: none"> <li>Community fundraisers that have gambling elements, held on council land (e.g. poker nights)</li> <li>Use of Council-owned and managed buildings</li> <li>Advertising, signage and sponsorships</li> <li>Research and monitoring trends</li> <li>Advocacy commitments</li> <li>Officer resourcing/time</li> <li>Health promotion partnerships, campaigns and events</li> </ul> <p>Other matters in which gambling harm can be reduced.</p>	
Streamlining/ readability of the Policy	3		<p>'What this means' and 'What we will do' structure added to each guiding principle of the Policy.</p>	<p>Following a similar structure to defining the guiding principles as the draft Health &amp; Wellbeing Plan, this structure provides more meaningful definitions and practical examples of how the principles will be implemented by Council.</p>
Streamlining/ readability of the Policy	4	<p>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 amended Monash Planning Scheme.</p> <p>Clause 52.28- Gambling</p> <p>Clause 21.05-2- Economic Development 'Key issues'</p> <p>Clause 21.05-3- Economic Development 'Objectives, strategies and implementation'</p> <p>Clause 21.06-2 – Major Activity and Neighbourhood Centres 'Key issues'</p> <p>Clause 21.06-3- Major Activity and Neighbourhood Centres 'Objectives, strategies and implementation'</p>	<p>1.3 Council will not support any application for EGMs on Council owned or managed land.</p> <p>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 <b>and having regard to the Gaming Policy provisions of the Monash Planning Scheme.</b></p>	<p>Updates to the Planning Scheme have removed specific clauses previously referenced, removed complicated references for readability.</p> <p>Planning scheme still sets out requirements to consider for any new EGM / gambling venues.</p>

[Monash Planning Scheme]				
Streamlining/ readability of the Policy	5	3.4 Council does not provide support (including use of its facilities), funding, publicity or promotion for community groups/organisations/sports clubs that promote or advertise gambling, particularly EGMs, sports betting, and online gambling. This excludes commemorative events such as ANZAC Day that are held by approved RSL clubs. All relevant Council policies and guidelines will align with this policy position.	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 <b>or endorse</b> 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.	Re-ordered policy statements to group statements that relate to sports clubs / community organisations.  Addition of 'or endorse' to provide clarity on the types of sponsorships not supported under the Gambling Harm Policy.
Streamlining/ readability of the Policy	6	Council acknowledges groups and clubs that have had sponsorship arrangements with gambling venues will require time to transition to new arrangements and will ensure that all groups and clubs that receive support/funding/facilities from Council will have a limited transition period to ensure their sponsorship arrangements align with this policy.	Removal of this statement	All clubs that had sponsorships in place when the changes to the policy came into effect (in 2022) should have been identified by now, new sponsorship arrangements would not be accepted under the transition period.
Streamlining/ readability of the Policy	7	Funding: To continue to progress its public health leadership, activity and advocacy in gambling prevention, Council will continue to dedicate resources to this issue and seek external	Removal of 'Funding' as a guiding principle	Double up of 'funding' as both a guiding principle and a priority.
Streamlining/ readability of the Policy	8	<b>Plan &amp; Regulate</b> Council is involved if a venue operator applies for new EGMs to be brought into Monash. Council can accept the planning permit or reject	<b>Plan &amp; Regulate:</b> Council is involved as a Statutory Authority if a venue operator applies for a planning permit for new EGMs to be	Additional details added on the EGM application process.

		it based on whether there is evidence the new machines will negatively impact the community. Refer to Appendix C for a description of the EGM application process	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.	
Streamlining/ readability of the Policy	9	<b>Fund &amp; Resource:</b> Council can support social initiatives that do not involve gambling through our Community Grants program or through council run programs and events.	<b>Fund &amp; Resource:</b> Council can support <b>social</b> initiatives that do not involve gambling through our Monash Community Grants Program (MCGP) or through Council-run programs and events. <b>Council provides community spaces including halls, meeting spaces and sporting pavilions, club rooms and reserves, often at significantly reduced costs to 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.</b>	Clearer articulation of the ways in which Council can fund/support alternatives to gambling harm and provide public spaces free from gambling advertising.
Updates to evidence base	10		Updates to data and references (Background & Context)	New research published and emerging issues have been included (e.g. cost of living)

Updates to evidence base	11	EGMs remain the most impactful to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain the main focus, the policy looks to cover all gambling activity such as online gambling etc.	EGMs remain <b>among</b> the most impactful <b>form of gambling</b> to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain <b>a primary</b> focus, the scope of this policy focuses on all forms of gambling that can cause harm to the community including (but not limited to): <ul style="list-style-type: none"> <li>• Electronic Gaming Machines (EGMs)</li> <li>• Sports betting</li> <li>• Community fundraisers that have gambling elements, e.g. lotto, poker nights etc</li> <li>• Commercial bingo</li> <li>• Keno</li> <li>• Horse/dog race wagering</li> <li>• Casino games</li> <li>• Online gambling</li> </ul>	Sports betting expenditure has increased to now match the levels of EGM expenditure.  Bingo has been identified in the latest Victorian Population Gambling and Health Survey as a gambling type commonly associated with harm. More research is required however this could be due to the digitisation of commercial bingo where 50 games can be played at once. Changes to policy to separate community group run bingo from commercially run bingo.
Updates to evidence base	12		Addition of Gamblers Help & 1800RESPECT support services available	Outcome of the Gender Impact Assessment (GIA), it is best practice to share both support services in all communications regarding gambling harm.
Updates to evidence base	13	4.2 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.	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.  <b>Targeted and accessible communication will be a priority.</b>	Result from the GIA conducted on the Policy refresh; specific cohorts can be at increased risk of gambling harm including young people, especially young men, older people, especially older women, people that speak a language other than English and people who are financially disadvantaged.
Capacity building	14	Council recognises that bingo and raffles can be conducted by community groups in efforts to create social environments or to fundraise for local charities / causes. Monash is not looking	Council recognises that community run bingo nights and <b>small-scale</b> raffles can be conducted by <b>sports clubs and</b> community groups in efforts to create	VGCC have rules for community gambling activities to provide regulation and prevent harm. Council will commit to sharing these

		<p>to prohibit these activities, instead Council wishes to ensure that harm from these activities is minimised.</p>	<p>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 <b>and Victorian Gambling and Casino Commission (VGCCC) regulations for community and charitable gambling are upheld.</b></p>	<p>regulations and supporting gambling harm prevention in community fundraisers. Fundraising raffles and bingo will continue to be supported under the Gambling Harm Policy, recommendations on how to prevent gambling harm within these activities will be provided to community.</p>
Capacity building	15	<p><b>Communicate:</b> We can 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.</p>	<p><b>Communicate &amp; Build Capacity</b> 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.</p>	<p>To support implementation of the Policy and as an outcome of the GIA, Officers will work with specific groups within the community to build their capacity and knowledge on gambling harm.</p>
Capacity building	16		<p><b>New Policy statements:</b></p> <p>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)</p> <p>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.</p> <p>4.4 Council facilities will be available for hire, subject to availability, as venues that do not promote gambling or gambling advertising.</p>	<p>Addition of 'Build Capacity' within priority area, recognising importance of not just sharing information with community but creating capacity for them to take their own actions in gambling harm prevention.</p> <p>New Policy statements leveraging Council touchpoints with community to build capacity within community to understand and prevent harm from gambling.</p>
Policy implementation	17		<p><b>New policy statement:</b></p> <p>1.5 Through lease, hire and licence agreements, Council will implement</p>	<p>Internal consultation with Legal team showed user understanding would likely be improved if users of Council facilities</p>

		2.4 Council will continue to elevate gambling to the highest level of public health prominence in Council strategic documents.	measures to prevent gambling activities on Council owned/managed land.  2.2 Council will continue to elevate gambling to the highest level of public health prominence in Council strategic documents ( <b>including Lease &amp; Licence Policy</b> ).	acknowledged on the agreement they sign that they will uphold the Gambling Harm Policy and mentions of gambling within the Leasing & Licensing Policy.  Currently user agreements have a broad 'we will uphold all Monash Policies' statement.
Policy implementation	18	1.5 Gambling activity or the promotion or advertising of any gambling activity or venue on Council-owned or managed land or in Council facilities is prohibited. This includes but is not limited to advertising or promotion within clubrooms, via newsletters or email banners, on club attire or paraphernalia, or on sports ground fencing or scoreboards. This pertains to all forms of gambling advertising, particularly sports betting, online gambling and EGM venues. Failure by user groups or tenants to comply with this requirement will result in their use of the facility being jeopardised.	1.6 Gambling activity and the promotion or advertising of any gambling activity or venue on Council-owned or managed land or in Council facilities is prohibited.  <b>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.</b>  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.	Added reference to lease agreements as per feedback from Legal team.
Policy implementation	19		<b>New Policy statement:</b>  3.3 Through the Active Monash Sports Club Framework, Council will prioritise subsidised leases for organisations that have no affiliation with gambling or gambling organisations.	Recognition of the role the Sports Club Framework in supporting the implementation of the Gambling Harm Policy through reduced rates and fees for clubs reducing harm from gambling.

Policy implementation	20	<p>2.5 Council staff will not attend gambling venues when representing the City of Monash, unless undertaking statutory functions. When representing Council in a formal capacity, Councillors are discouraged from attending gambling venues however there may be circumstances where the Councillor determines the event warrants attendance and can exercise their discretion.</p>	<p>2.5 Council staff will not attend gambling venues when representing the City of Monash, unless undertaking statutory functions <b>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.</b> When representing Council in a formal capacity, Councillors are discouraged from attending gambling venues however there may be circumstances where the Councillor determines the event warrants attendance and can exercise their discretion.</p>	<p>There have been instances of meetings where Council officers are required e.g. SRL meeting occurred at Glen Waverley RSL. Where necessary and supported by executive management, some flexibility on this policy point is required.</p>
Updates to advocacy commitments	21	<p>2.1 Council will advocate for a continuation of the current maximum municipal limit and regional cap in the municipality and will oppose any increase to that number or the inappropriate relocation of existing machines to areas that are considered vulnerable taking into account the Socio-Economic Indexes for Areas (SEIFA) index of disadvantage.</p>	<p>2.1 Council will advocate for <b>a sinking cap on the number of EGMs in Monash and a continuation of the regional cap</b> (regional cap and municipal limits defined in Background &amp; Context document).</p>	<p>Based on the current regional cap and municipal limit on the number of EGMs permitted within Monash, there is capacity for an additional 438 EGMs. Municipal limits are based on population so the limit could increase as Monash's population grows.</p> <p>Monash has 955 EGMs across 15 venues, placing Monash 5<sup>th</sup> highest in the state for number of EGM venues.</p> <p>\$126m was taken by the existing 955 EGMs in Monash. This is an average of \$132k per machine per year.</p> <p>Based on these statistics Officers feel Monash's EGM limit needs to be lowered.</p>

Updates to advocacy commitments	22	<p>2.2 Council will continue to advocate for regulatory reform to reduce harmful practices in the gambling industry including but not limited to:</p> <ul style="list-style-type: none"> <li>• Advocating for the permanent reduction of gambling room operating hours, with all gambling rooms to be closed between midnight and 10am.</li> <li>• Council will advocate for the elimination of sports betting advertising, particularly within the live viewing of sport and to young people.</li> <li>• Advocate for the reduction of the maximum bet on EGMs to \$1 per spin.</li> <li>• Advocate that Class A community benefits provided by gambling venues should be provided as gifts or donations to community groups and clubs, not as sponsorship.</li> <li>• Advocate for changes to regulations concerning the design of EGMs to reduce characteristics designed to promote persistent machine use and addiction.</li> <li>• Advocate for changes to EGM licensing requirements to strengthen protections for users against gambling harm.</li> </ul>	<ul style="list-style-type: none"> <li>• 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: <ul style="list-style-type: none"> <li>• The permanent reduction of gambling room operating hours, with all gambling rooms to be closed between midnight and 10am.</li> <li>• The elimination of sports betting advertising, particularly during live viewing of sport and targeted online gambling advertising to young people.</li> <li>• The reduction of the maximum bet on EGMs to \$1 per spin.</li> <li>• <b>Reforms to the Community Benefit scheme, including a more transparent reporting processes and exclusion of sponsorships and operating costs as claimable community benefits.</b></li> <li>• Changes to regulations concerning the design of EGMs to reduce characteristics designed to promote persistent machine use and addiction.</li> <li>• Changes to EGM licensing requirements to strengthen</li> </ul> </li> </ul>	<p>There have been some wins for gambling reform including reduced opening hours of EGM venues to a mandatory closure of 4am-10am for all venues and a mandatory carded play system which will introduce a pre-commitment step for all users of EGMs.</p> <p>Whilst these reforms are welcomed, Council's advocacy points are still relevant and reflective of the harm caused by gambling.</p> <p>The Alliance for Gambling Reform set midnight-10am as the ideal shut down time based on available data of when harm happens and acknowledges incremental change is required to reach this measure.</p> <p>Advocacy regarding reforms to the Community Benefit Scheme are recommended to be broadened to cover issues including the huge amount of operating costs EGM venues are claiming (class B benefits) and the Class A benefits totalling \$1m each that EGM venues owned by Moonee Valley Racing Club and Melbourne Racing Club claimed as 'sports facilities used by members' in the 2023/2024 financial year. Officers recommend to continue to advocate that Class A benefits should not include sponsorship arrangements with local clubs – donations or gifts should be the only claimable form of giving back.</p>
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