

Anglicare Tasmania Submission to the Future of Gaming in Tasmania

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About Anglicare Tasmania

Anglicare Tasmania is a large community service organisation in Tasmania with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport, Burnie, Sorell and Zeehan and a range of programs in rural areas. Anglicare Tasmania's services include: crisis, short-term and long-term accommodation support; NDIS disability and mental health support services; support services following a motor vehicle accident; aged and home care services; alcohol and other drug services; financial and gambling counselling; and family support. In addition, Anglicare Tasmania's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

Anglicare Tasmania is committed to achieving social justice for all Tasmanians. It is our mission to speak out against poverty and injustice and offer decision-makers alternative solutions to help build a more just society. We provide opportunities for people in need to reach their full potential through our services, research and advocacy.

Anglicare Tasmania's work is guided by a set of values which includes these beliefs:

- that each person is valuable and deserves to be treated with respect and dignity;
- that each person has the capacity to make and to bear the responsibility for choices and decisions about their life;
- that support should be available to all who need it; and
- that every person can live life abundantly.

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Our recommendations

Anglicare Tasmania welcomes the opportunity to comment on the *Gaming Control Amendment (Future Gaming Market) Bill 2021*. We have considerable experience delivering Gamblers Help services, community-based programs, financial counselling, and research to support people harmed by gambling addictions.

The new model proposed does not effectively address the harm caused by gambling. In particular, we want to see embedded in the legislation a public health approach to prevent and reduce the harm caused by Electronic Gaming Machines. Our recommendations outline appropriate harm minimisation strategies and address specific concerns detailed in the proposed changes. We urge the government to consider these measures to build healthy public policy that supports Tasmanians.

Reduce Harm

Harm minimisation strategies do not impact on the number of jobs the industry provides to Tasmania, nor do they impact recreational gamblers.

Harm minimisation strategies for Electronic Gaming Machines should be embedded in the new legislation. These have been detailed in previous submissions and include:

- a maximum bet limit of \$1;
- a minimum spin rate of 6 seconds; and
- a mandatory card-based pre-commitment system.

In addition, the Government should provide to Parliament an annual report on the actions it has taken to prevent and reduce harm and the outcomes. This should be based on the advice and actions of the Tasmanian Liquor and Gaming Commission (TLGC), Gambling Support Program and the independent review of the social and economic impact of gambling in Tasmania.

We also disagree with the following proposed changes and do not believe they are in keeping with the government's stated commitment to harm minimisation:

Section 50: Removing the need for competency certificates. Certificates and set standards are required to ensure consumer protection. This section should be strengthened to specify special employees are required to undergo certified training to identify and support a person at risk of harm from gambling.

Section 121: Removal of the need for casinos to erect warning signs. These signs are an important deterrent and may prompt behavior change for those struggling with addiction.

Section 151: The independent review of the social and economic impact of gambling in Tasmania should remain set at every 3 years. The legislation should be strengthened to stipulate how the findings of the SEIS are used to develop harm reduction initiatives and be reported on annually (see above recommendation).

More generally, we are concerned about the potential that the new proposal may increase the need for pubs and clubs to promote gambling in a competitive market. To this end, we recommend strengthening the Responsible Gambling Mandatory Code of Practice, especially in relation to advertising and incentives.

Reduce Availability

The capping and distribution of Electronic Gaming Authorities

We believe there should be further limits on the overall number of Electronic Gaming Authorities in Tasmania.

Section 101B: The proposed amendment of a maximum of 2350 should be further reduced across the state.

Additionally, the legislation should allow for numbers to be capped according to the Index of Relative Socio-Economic Disadvantage. There is a direct correlation in Tasmania between the socio-economic status of an area and the number of poker machines and annual losses (Hansard 28 February 2017; Charles Livingstone, p.9). The legislation should require the minister to consider a population health needs assessment prior to granting Electronic Gaming Authorities.

Opening hours

The legislation should specify that gambling venues can only operate for a maximum of 12 hours per day.

Many gambling venues are open between 14 and 18 hours a day, between 8am and 2am, which is much longer than most other businesses in Tasmania. It is unlikely that purely recreational gamblers frequent venues at the extremes of these opening times. Restricting the accessibility of gambling to a maximum of 12 hours a day would create a more supportive environment for Tasmanians, particularly for those with a gambling addiction or those at risk of developing an addiction.

Community Support Levy

Section 151: The Community Support Levy should be applied equally across casinos, hotels and clubs and be set at 5%.

Anglicare supports extending the Community Support Levy to casinos, but believes they should be charged at the same rates as hotels.

100% of the Community Support Levy should be used for activities that support people not to gamble or to gamble less.

Community Interest Test

We welcome the extension of the Community Interest Test objection period from 14 to 28 days. However, we believe that this change in legislation and application for Electronic Gaming Authorities should require the completion of a Community Interest Test.

Section 36: A Community Interest Test should apply at the commencement of these new arrangements and prior to any licence renewal or addition of Electronic Gaming Machines to any venue. All results from the Community Interest Test should be publicly available.

Furthermore, the Tasmanian Government should make public the criteria and standards it uses for assessing the Community Interest Test. These standards should clearly reflect evidence from the independent review of the social and economic impact of gambling in Tasmania and a local population health needs assessment.

General Amendments

Duration of EGA license

Section 42: The proposed duration of a 20-year licence is excessive, especially considering this is at no cost to the applicant. Anglicare supports the proposal by the TLGC recommending a 7-year licence length that aligns with the timing of Electronic Gaming Machine turnover (TLGC 2017 p. 203 Submission on Future Gaming Markets).

The Licensed Monitoring Operator

The LMO (or an associated entity) who will monitor the network of EGMs in hotels and clubs should not be allowed to operate their own Electronic Gaming Machines or hold an Electronic Gaming Authority. This would guard against potential fraud and corruption.

High Roller Casinos

The requirement for no Electronic Gaming Machines in proposed high roller casinos should be explicit in the legislation.