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Responses by the Synod of Victoria and Tasmania, Uniting Church in Australia to the Survey Questions – allocation of Community Support Levy Funding under the Future Gaming Market

25 August 2021

The Synod of Victoria and Tasmania, Uniting Church in Australia, welcomes the opportunity to provide responses to the survey questions on the allocation of Community Support Levy Funding under the Future Gaming Market.

SURVEY QUESTIONS

Categories for distribution of the CSL

It is proposed that the following new, and more broadly worded, categories for distribution of the CSL replace the current categories and set weightings contained in the Act.

Subject to this consultation, these categories will be included in the regulations:

- **community capacity building projects or initiatives;**
- **preventative programs or initiatives;**
- **direct support programs or initiatives; and**
- **research activities.**

In relation to the above categories for the distribution of CSL funds, we would appreciate your feedback to the following questions:

1. Do you support the proposed categories? YES – provided that all the categories are related to preventing gambling related harm or addressing gambling related harms that have occurred.
2. If you answered “NO” for question 1, what categories would you suggest and why?
3. Do you think that one or more of the categories should receive a greater proportion of funding over any of the others? YES
4. If you answered “YES” for question 3, please provide details of your recommended weightings for each category and why.

We support each of the following categories not being less than 15% of the CSL funding:

- preventative programs or initiatives; and
- research activities.

The allocation of 15% is based on existing spending in these areas.¹

¹ Michael O’Neil, Steve Whetton, Anthony Kosturjak, Jim Hancock, Tania Dey, Paul Delfabbro, Kerry Sproston, Glyn Wittwer, and Saul Eslake, ‘Fifth Social and Economic Impact Study of Gambling in Tasmania 2021. Volume 1: Industry Trends and Impacts’, South Australian Centre for Economic Studies, June 2021, 85.

Preventative programs are important to stop harm from gambling before it occurs. As some of these initiatives require trying to reach the whole Tasmanian adult population, such as through mass media, there can be the need for significant expenditure if these efforts are to be effective.

Adequate research funding is necessary to assist the Tasmanian Government in identifying measures, reforms and services that can further reduce gambling related harm.

The Synod would not wish to Gamblers Help services cut, so support funding for “direct support programs or initiatives” being maintained at 30% or more of the CSL, as is currently the case.² However, we note that the 2017 assessment of the Tasmanian Audit Office found the Gamblers Help Services did not have adequate targets or performance measures. Also, there was no measureable means to determine their contribution to reducing harm.³ We have been unable to locate how these issues were addressed and any reporting against targets and performance measures outside of the number of people accessing the service and the number closed clients. Assessing the harm minimisation impact of the Gamblers Help services could be an area for additional research.

We would also hope to see a measure of how quickly people are able to access Gamblers Help services when they wish to do so and if there are any people who get placed on a waiting list.

5. Do you believe that the percentages should be more flexible at the margins, eg "not more than x per cent" or "no less than x per cent", rather than a set percentage? YES – as indicated above have a preference for “no less than x per cent”.

6. Are there any other comments you wish to provide regarding the proposed categories for the distribution of CSL funds?

² Ibid., 85.

³ Tasmanian Audit Office, ‘Report of the Auditor-General No. 13 of 2016-17. Gambling revenue and managing harm from gambling’, June 2017, 26-29.

Considerations for the distribution of the CSL

It is proposed that the following considerations inform the distribution of CSL funding within the categories under the new model. For funding to be approved, a project, program or grant would need to be consistent with at least one of these considerations.

Subject to this consultation, these considerations for the approval of funding from the CSL within each category will be included in the regulations:

- **creating a link between the location of gambling losses and CSL spending;**
- **collaboration and partnering with other organisations to maximise reach and delivery of programs/initiatives to support prevention and treatment of problem gambling;**
- **supporting long term programs aimed at reducing problem gambling behaviour;**
- **supporting one-off grants for major initiatives aimed at reducing problem gambling;**
- **provisioning of ongoing counselling for problem gamblers;**
- **investment in programs, infrastructure and activities that enable greater community engagement and healthy lifestyle opportunities (as a diversion from gambling);**
- **supporting funding for research and evaluation of problem gamblers; and**
- **ensuring the distribution of the CSL is subject to regular review (eg to be reviewed every five years following the Social and Economic Impact Studies).**

In relation to the above considerations for determining the distribution of CSL funds, we would appreciate your feedback to the following questions:

1. Do you support the above considerations? YES – provided the language for each of them shifts away from “problem gamblers”. Our preferred list would be:

- creating a link between the location of gambling losses and CSL spending;
- collaboration and partnering with other organisations to maximise reach and delivery of programs/initiatives to support prevention and treatment of gambling harm;
- supporting long term programs aimed at reducing gambling harm;
- supporting one-off grants for major initiatives aimed at reducing gambling harm;
- provisioning of ongoing counselling for people harmed by gambling;
- investment in programs, infrastructure and activities that enable greater community engagement and healthy lifestyle opportunities (as a diversion from gambling);
- supporting funding for research and evaluation of measures to prevent and reduce gambling harm; and
- ensuring the distribution of the CSL is subject to regular review (eg to be reviewed every five years following the Social and Economic Impact Studies).

2. If you answered “NO” or “NOT ALL” for question 1, please provide details of the considerations you would suggest for determining the allocation of CSL funds and why?

3. Are there any other comments you wish to provide regarding the proposed considerations for informing the distribution of CSL funds?

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