



Liquor and Gaming Branch
Department of Treasury and Finance
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Via email: consultation.lagb@treasury.tas.gov.au

Gaming Control (Community Support Fund) Regulations 2022

The Salvation Army thanks the Tasmanian Government for the opportunity to comment on the *Gaming Control (Community Support Fund) Regulations 2022*. We appreciate the steps the Tasmanian government is taking toward best practice approaches to gambling regulation and minimising harm for people affected by gambling issues in Tasmania.

The Salvation Army is an international Christian movement with a strong presence in Tasmania and throughout Australia. Our vision is to confront hardship and injustice by living, loving and fighting alongside others to transform Australia one life at a time, with the love of Jesus.

The Salvation Army is opposed to gambling. We hold the view that gambling is an exploitative practice that should not be a means of income generation or economic development, whether by government agencies, charitable organisations, churches or commercial interests.¹ Gambling is not merely a harmless activity but can become a compulsive dependency, often preying on the most vulnerable people.² We strongly believe that much more can be done to reduce harm from gambling in Tasmanian communities.

We see the impact of gambling across our services including our family and domestic violence services, homelessness support services, emergency relief and Moneycare (The Salvation Army's financial counselling and financial literacy and capability service).

In responding to the proposed amendments in the *Gaming Control (Community Support Fund) Regulations 2022*, this submission is informed by our previous submissions and experience assisting people, including their family and friends, who have experienced financial hardship, stress and other harms to their wellbeing as a result of gambling. Specific submissions to the Tasmanian Government over the past 12 months include:

- Survey responses to the allocation of Community Support Levy Funding under the *Future Gaming Market Bill in Tasmania* (July 2021); and consultation on the *Future Gaming Market Bill in Tasmania* (August 2021);

¹ The Salvation Army International Positional Statement (2012). *Gambling*.
https://s3.amazonaws.com/cache.salvationarmy.org/e9ce2248-e635-4490-967e-f8b0a821c391_English+Gambling+IPS.pdf.

² Ibid.

Founders **William & Catherine Booth**
General **Brian Peddle**

- Consultation on facial recognition and player card gaming technologies to minimise gambling harm (April 2022); and
- Consultation on Second Review of the *Responsible Gambling Mandatory Code of Practice for Tasmania* (June 2022).

In our survey responses on the allocation of Community Support Levy (CSL) funding under the *Future Gaming Market Bill in Tasmania* in 2021, The Salvation Army did not support the proposed categories for the distribution of CSL funds. Our response expressed our concern that while suggested categories may be appropriate if they included direct reference to services related to problem gambling or treatment of problem gambling, the categories were 'so broad that they could be applied to any preventative or community building project without addressing the issues created by the use of electronic gaming machines (EGMs) in Tasmania.'³

The Salvation Army recognises that the updated categories listed at section 4 of the draft *Gaming Control (Community Support Fund) Regulations 2022* (the draft regulations) governing the purpose and distribution of the newly created Community Support Fund (CSF) have been updated from the categories proposed during the 2021 CSL consultation. The updated categories more clearly set out the scope and purpose of funding allocations, predominantly for services, initiatives or research aimed at the minimisation, or prevention of gambling harm or direct support programs, or both.⁴ The exception is section 4 (Distribution of Community Support Fund), item (d) which includes distribution of funds for 'community capacity building and community development projects, programs or initiatives.' While this category remains broad, we would expect that the allocation of funds applied under this category would be consistent with section 6 (Criteria in consideration of allocation), item (f) which includes Ministerial approval for CSF allocations for 'investment in programs, infrastructure and activities that act as protective factors against gambling harm, including community engagement and health and wellbeing initiatives.' Under this funding allocation category, we are keen to ensure that the objective of the CSF continues to predominately focus on gambling harm minimisation activities rather than 'general activities', for example, for sporting and recreational activities that may favour a gaming venue's support for their own sporting clubs.

The draft regulations also remove the previous weightings for distribution of funds to 'provide greater flexibility and responsiveness to any emerging issues and changes in priorities within the gambling environment'.⁵ While removal of weightings may achieve this objective, we are keen to ensure that the allocation of CSF allocations remains fair and transparent.

³ The Salvation Army (2021, July). *Survey responses to the allocation of Community Support Levy Funding under the Future Gaming Market Bill in Tasmania*. <https://www.treasury.tas.gov.au/liquor-and-gaming/community-interest/public-consultation/future-gaming-market-2021>.

⁴ Tasmanian Government Office of Parliamentary Counsel. (2022, 27 May). *Gaming Control (Community Support Fund) Regulations (draft version 4)*. [https://www.treasury.tas.gov.au/liquor-and-gaming/community-interest/public-consultation/gaming-control-\(community-support-fund\)-regulations-2022](https://www.treasury.tas.gov.au/liquor-and-gaming/community-interest/public-consultation/gaming-control-(community-support-fund)-regulations-2022).

⁵ Ibid.

We recommend the Tasmanian Liquor and Gaming Commission’s (the Commission) administrative oversight of the CSL include the timely provision (at least annually) of publicly available information on the breakdown of all funds allocated against proposed distribution categories in dollar terms as well as a percentage of the overall CSF. Transparency of such data would instill greater public confidence that the removal of weightings for distribution of CSF funds do not lead to disproportionate funding allocations that do not address gambling harm or seek to reduce the risks of gambling harm. Given that the increased pool of funds available under the CSF from July 2023 will be derived from EMG losses, it is important that these funds flow back to the community to support greater investment in harm minimisation and preventative health.

We also support a formal review of efficacy of the distributed CSF every five years as proposed in the draft regulations, however note that ‘efficacy’ is not defined within the draft regulations. We recommend the Commission explicitly define efficacy as part of section 7 (Ministerial Guidelines) in the final regulations. Activities considered for CSF funding should submit applications that satisfy this definition as part of the approval process. Monitoring the efficacy of activities should also be incorporated into the CSF recipient guidelines. Ongoing monitoring of activities will help to demonstrate positive efficacies earlier, and before such activities are replicated or become more costly. Monitoring activities on a regular basis will also contribute to a bank of evidence to support the formal five-yearly review.

We again thank the Tasmanian Government for the opportunity to comment on the *Gaming Control (Community Support Fund) Regulations 2022*. Our experience assisting people experiencing gambling harm reinforces our view that it is critical that gambling harm be addressed using a holistic approach that enables key stakeholders to concentrate on building well-functioning communities (rather than focus only on the individuals who experience harm), and to prevent harms associated with gambling from occurring (rather than focus only on treating individuals when the harm has already occurred). We support the CSF regulations in its efforts towards these goals.

The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from [redacted] or [redacted]

Yours sincerely
[redacted]

Paul Hateley, Major
Head of Government Relations
The Salvation Army Australia

4 July 2022

The Salvation Army acknowledges the Traditional Owners of the lands and waters throughout Australia. We pay our respect to Elders and acknowledge their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

We also acknowledge future aspirations of all First Nations peoples. Through respectful relationships we will work for the mutual flourishing of Aboriginal and Torres Strait Islander Australians and non-Indigenous Australians.

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.