

Draft Gaming Control (Community Support Fund) Regulations 2022

Submission from Sport and Recreation.

This submission will focus on the impact of the proposed Regulations on funding to the sport and recreation sector.

Current context

Sport and Recreation in the Department of State Growth (formerly part of the Department of Communities Tasmania) has administered the 25 per cent of Community Support Levy (CSL) funding allocated for the benefit of sport and recreation clubs.

Outside of the most recent years impacted by COVID-19 restrictions, the annual funding available for the benefit of sport and recreation clubs has been in the order of \$1.1 - \$1.2 million, with some decline in funding levels over time.

This funding, amounting to approximately \$24 million since the CSL came into effect in 1997, has been distributed under a number of programs benefiting sport and recreation clubs including infrastructure improvements, planning requirements, and equipment purchases. These funding programs distributing the CSL funds continue to be over-subscribed, demonstrating a continued need for funding to be made available to the sector.

Proposed regulations

The stated aim of any changes to the arrangements for allocation of the CSL is to ensure its continued relevant and greater effectiveness. Sport and Recreation supports the view that the funding under the proposed Community Support Fund (CSF) should be relevant and effective, and able to be flexibly allocated to respond to identified and emerging needs in the community.

Sport and Recreation note the proposed Regulations:

- Do not include specific allocations or weighting for the four purposes set out in Regulation 4.
- Do not include a specific reference to funding allocated for the benefit of sport and recreation clubs as was included in the CSL, instead creating a broad 'catch-all' purpose of "community capacity building and community development projects, programs or initiatives" (Regulation 4 (d)), which is not defined.
- Tie allocations of funding to gambling losses or harm research, prevention or minimisation.

While Sport and Recreation supports flexibility and responsiveness in the CSF's distribution and its focus on gambling harm prevention and minimisation, without any specific allocation or weighting the proposed regulations provide no certainty that funding will be allocated to any of the four purposes, nor the size of any allocation. Rather, it relies on Treasury's assessment of the value of any proposals put forward by a State Service Agency, with final approval by the Minister (Treasurer).

There is no guidance provided in the Regulations on what basis Treasury will make any assessment, other than it must meet one or more of the criteria in Regulation 6 (again, no prioritisation is provided).

Recommendation: the Regulations include clarity in relation to how allocations are to be determined.

Sport and Recreation has strong concerns that there is no certainty that funding will be allocated for the benefit of sport and recreation clubs under the proposed Regulations, particularly given the very broad nature of activities that may be possible to fund under Regulations 4 (d) and Regulation 6. This is despite the important role that clubs play in building social cohesion and supporting improved physical and mental health, all strong protective factors against gambling harm. There may be a tendency for an increased proportion of funds to be directed to harm minimisation programs, for which more readily-available and direct evidence may exist, rather than preventative or protective programs which may not have access to similar levels of evidence or the evidence is more broad in nature.

Recommendation: that the Regulations include a specific reference to sport and recreation programs being included as a purpose under Regulation 4.

At a drafting level, CSR recommends that the term 'Recipient', as defined in Regulation 3, is not used in this context. 'Recipient' would ordinarily be understood to mean an organisation receiving funding from a State Service Agency to undertake activities under the purposes in Regulation 4, rather than a State Service Agency allocated funding for further distribution as the current definition provides. CSR suggests replacing 'Recipient' with 'Allocated Agency' or similar wording to make this distinction clear.

Recommendation: that the term 'Recipient' is replace with a more suitable term

Sport and Recreation would be pleased to provide further details on the points outlined in this submission. Helen Langenberg can be contacted on [REDACTED] or

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