



**Neighbourhood Houses
Tasmania**

Submission to

**Future of Gaming in Tasmania
(Future Gaming Market) policy**

To discuss details in this submission please contact

Tracey Tasker, CEO NHT

E: ceo@nht.org.au or 6228 6515

March 2020

Neighbourhood Houses Tasmania and the Network of Neighbourhood Houses we represent

There are 35 Neighbourhood Houses (Houses) across Tasmania, 34 of which are funded by the Tasmanian State Government under the Neighbourhood House Program (NHP) and supported through Neighbourhood Houses Tasmania (NHT) as their peak body. All Houses primarily engage in community development work in disadvantaged or socially isolated communities. Houses are all separately incorporated community organisations governed by a volunteer local management committee.



- | | |
|----------------------|--------------------|
| 1 Phoenix | 23 West Moonah |
| 2 Burnie | 24 Warrane |
| 3 Ulverstone | 25 Mornington |
| 4 Devonport | 26 Midway Point |
| 5 East Devonport | 27 Dowsing Point |
| 6 Beaconsfield | 28 Karadi |
| 7 George Town | 29 Goodwood |
| 8 Dorset | 30 Rokeby |
| 9 St Helens | 31 Clarendon Vale |
| 10 Fingal Valley | 32 Okines |
| 11 Starting Point | 33 Dunalley Tasman |
| 12 Rocherlea (NSCC) | 34 Maranoo Heights |
| 13 Mowbray (NSCC) | 35 West Winds |
| 14 Tresca | 36 Geeveston |
| 15 Deloraine | |
| 16 Rosebery | |
| 17 Zeehan | |
| 18 Derwent Valley | |
| 19 Bridgewater (JRS) | |
| 20 Gagebrook (JRS) | |
| 21 Risdon Vale | |
| 22 Bucaan | |

Houses are places where people come together and find support, belonging and purpose as they work together to support their local community and make a real difference in people's lives. They are run by the community, for the community and offer a wide range of programs and activities for local people. Houses are the warm and generous heart of their communities.

As a Network, the Houses form the largest community development infrastructure in Tasmania, with the most regionally diverse footprint of any non-government community service organisation in the state.

The Network has been working together across Tasmania for over 30 years, with many Houses serving their local community for over 40 years (as of 2019).

What is community development?

Community development involves ways of working that empower individuals and groups of people to make changes in their community on issues that affect them.

At its most simple – and powerful – community development is the art of bringing people together, united by a common concern or opportunity, and choosing to work together to deliver change.

The process of working together connects people, groups and organisations with a greater sense of purpose and meaning. It also has greater potential for collective impact. The process is founded on ways and means to create connections and belonging. Everything builds from there.

Houses maintain a focus on community development by:

- Responding to community needs
- Representing community views
- Delivering programs using community practices
- Facilitating delivery of services locally
- Building community capacity

NHT and the Houses capture the impact of their work through outcomes reporting based on the Results Based Accountability™ framework.

Highlights from our summary, [Making a Difference](#), of the outcomes from the Network in 2016-17 show:

- 779,592 contacts were made by community members with all Houses
- This is 23,624 on average in each House for the year
- Which is equivalent to 492 contacts per week in each House
- Volunteers contributed 266,904 hours across the State over the year
- It means there are 168 hours of volunteering per week in each House
- Each House worked with an average of 39 partner organisations during 2016-17.

During 2018-19, the feedback about Houses from participants included:

- 70% reported an increased connection with others in their community.
- 67% reported increased knowledge of services and support.
- 76% would come back to do the activity again.

In addition, feedback from partner organisations included:

- 90% reported that the House was a constructive and reliable partner.
- 83% reported that the House assisted them to connect with and work in their local community.

Further information about the Network can be found [here](#). How we work with communities and key stakeholders is underpinned by our [Strategic Framework](#) and our [Shared Commitment to Collaboration Protocol](#).

Consultation process for this Submission

NHT has drawn on feedback from our member Houses for this Submission. The NHT Board, consisting of 10 House representatives have provided feedback on the Submission and have had initial discussions about the Future of Gaming in Tasmania Public Consultation Paper. All of these perspectives have shaped our responses.

NHT and the Network of Houses feel strongly that the proposed reforms in the Government's Future Gaming Market policy will have detrimental impacts on our communities. This Submission focuses on specific aspects of these reforms including:

- Ensuring the highest standards of probity.
- Continuing to minimise the harm caused by problem gambling.
- Decreasing the state-wide cap for electronic gaming machines (EGMs).
- Increasing the future funding to improve harm minimisation.

Probity standards

Our role is not to understand the specific details of licencing, regulation, monitoring and compliance however it is critical that these processes work well and are in the best interests of those impacted (and potentially) impacted by problem gambling.

NHT and the Network of Houses expect that processes used by Government to administer, regulate and monitor gambling in Tasmania reflect the values of probity, transparency and accountability and contribute to reducing the harm associated with problem gambling.

Recommendations:

- Information about licenses (i.e. application processes, re-issuing, transfer) and due diligence processes (i.e. applicant screening, monitoring, compliance and regulation) should be developed and made public.
- Monitoring of adherence to licensing requirements must also be implemented.
- Policing and penalties for breaching licensing agreements must be strong enough to be a deterrent.

Minimising the harm caused by problem gambling

For every person with an addiction to poker machines, the lives of five to ten other people are affectedⁱ.

2000 Tasmanians are seriously harmed with a further 6000 people at moderate risk and 15,000 adults at low risk from their gambling with most harm being caused by pokiesⁱⁱ

Accessibility is the biggest risk factor for developing an addiction to poker machinesⁱⁱⁱ

The harm caused by problem gambling is well known and Houses work with affected individuals, families and communities on a day-to-day basis. Problem gambling contributes to already overburdened health and social support systems.

Alarmingly the Governments policy does “not propose any specific changes to the harm minimisation framework.”^{iv} The framework does not include the effective harm minimisation strategies of spin speeds, bet limits, near misses and losses disguised as wins.

Without change, the Governments current approach means we are accepting of the current level of harm. Our Network believes while we are making changes to the licences and spreading the responsibility for managing harms in our community, by increasing the number of licences, we should also be moving to increase the protections for the community.

An increased focus on minimising harm caused by problem gambling is needed. However, there are also opportunities to better **prevent** gambling related harm through identifying effective policy interventions. Research commissioned by the Victorian Responsible Gambling Foundation explored the most effective policy drivers in areas such as alcohol, tobacco, physical activity and HIV and their transferability to gambling^v.

Recommendations:

- Research, develop and implement effective policy interventions to **prevent** gambling related harm before it occurs.
- Prioritise the best interests of Tasmanian communities and people impacted by problem gambling by embedding effective harm minimisation strategies including spin speeds, bet limits, near misses and losses disguised as wins.
- Review the harm minimisation framework and include the strategies of spin speeds, bet limits, near misses and losses disguised as wins.

Decreasing the state-wide cap for EGMs

It is well known that EGMs are the gambling product most associated with problem gambling and associated health risks i.e. they are the currently riskiest form of gambling available in Australia.^{vi} There is significant evidence indicating the harmful impacts of EGMs.

The communities in which Houses are established are affected by problem gambling. Houses are at the frontline of the negative impact, whether its supporting mental health issues, financial poverty, family violence and relationship breakdown etc.

The proposed decrease to the cap for EGMs is disingenuous; it is not an actual reduction in the number of EGMs but a reflection of the actual number of EGMs currently in Tasmania. Houses already feel the burden of EGMs. Whilst Houses are one level of support for people impacted, we are under resourced. This strategy does not relieve the burden for communities or the level of support requested from Houses.

Recommendations:

- Reduce the **actual** number of EGMs in Tasmanian communities.
- Consult with key stakeholders in the development of the community interest test process(es).
- Ensure appropriate and adequate policies and systems are in place to support the community interest test process(es).
- Establish base line figures (individuals, communities, charities and governments i.e Health Department and health service providers) to understand how effective current harm minimisation measures are.

Increasing the future funding to improve harm minimisation

The Tasmanian Governments investment in the NHP provides significant value to the Government, other Service Providers and the Tasmanian community as Houses have unique connections with community and evidence informed understanding of the social impacts of policy and systemic vulnerability. Houses provide safe, inclusive places in communities most at risk of experiencing gambling problems and play a key role on reducing social isolation, strengthening communities and building community resilience. Houses support local communities in the following ways:

- Houses are located in geographical areas affected by problem gambling.

Pokies are deliberately located in low socio-economic areas and gambling losses and levels of harm are significantly higher in these areas^{vii}.

- Houses cater for gamblers' need for a '**third place**' (alternative to home or place of employment).
- Houses are close in proximity to many gambling venues.
- Houses address the factors contributing to and exacerbated by problem gambling including:
 - Family violence.
 - Mental health.
 - Social isolation.
 - Alcohol and drug issues.
 - Health and wellbeing.
 - Financial challenges and literacy.
 - Unemployment.
- House are resourceful, innovative and able to leverage existing community services, networks and resources.

Houses see first-hand the impacts of problem gambling; increasingly Houses are struggling to meet the needs of their communities as the complexity and number of people needing support increases.

The Report of the Auditor-General^{viii} provided insights into the performance and compliance of the CSL. The report acknowledges the value and contribution of Houses in reducing the impact of harm related to problem gambling.

NHT and the Network of Houses would prefer harm from problem gambling be avoided through prevention. However, we support the proposed reforms to increase the funding to improve harm minimisation (i.e. to extend and increase the CSL) to match the extension of the gambling footprint in Tasmania. We are also interested in the outcomes of this work and the impacts of funded activities and programs for Tasmanian communities.

Recommendations:

- Increase the reach and effectiveness of CSL funding to focus on policy interventions to **prevent** gambling related harm.
- Use CSL funding to enhance wellbeing of vulnerable groups and communities **and** embed effective harm minimisation strategies.
- Dedicate a proportion of CSL funds to independent research, evaluation and data collection.
- Use the CSL funding to build the capacity of funded providers to understand and report on harm minimisation outcomes.

Conclusion

NHT and the Network of Houses have been strong advocates for reducing the impacts of problem gambling within our communities. Much of our work is aimed at achieving this goal. The current level of investment in the NHP through the CSL represents value for money and is delivering outcomes using community development and places-based approaches. More can be done.

This Submission highlights opportunities not currently considered in the proposed reforms to prevent and minimise the impacts of problem gambling on our communities, reorient resources and create systems change to better serve Tasmanians most at risk.

Our Recommendations

1. Information about licenses (i.e. application processes, re-issuing, transfer) and due diligence processes (i.e. applicant screening, regulation and monitoring) should be developed and made public.
2. Monitoring of adherence to licensing requirements must also be implemented.
3. Policing and penalties for breaching licensing agreements must be strong enough to be a deterrent.
4. Research, develop and implement effective policy interventions to **prevent** gambling related harm before it occurs.
5. Prioritise the best interests of Tasmanian communities and people impacted by problem gambling by embedding effective harm minimisation strategies including spin speeds, bet limits, near misses and losses disguised as wins.
6. Review the harm minimisation framework and include the strategies of spin speeds, bet limits, near misses and losses disguised as wins.
7. Reduce the **actual** number of EGMs in Tasmanian communities.
8. Consult with key stakeholders in the development of the community interest test process(es).
9. Ensure appropriate and adequate policies and systems are in place to support the community interest test process(es).
10. Establish base line figures (individuals, communities, charities and governments i.e Health Department and health service providers) to understand the effectiveness of current harm minimisation measures.
11. Increase the reach and effectiveness of CSL funding to focus on policy interventions to **prevent** gambling related harm.
12. Use CSL funding to enhance wellbeing of vulnerable groups and communities **and** embed effective harm minimisation strategies.
13. Dedicate a proportion of CSL funds to independent research, evaluation and data collection.
14. Use the CSL funding to build the capacity of funded providers to understand and report on harm minimisation outcomes.

References

- ⁱ Productivity Commission 1999, *Australia's Gambling Industries Final Report, Summary Report No. 10*.
- ⁱⁱ ACIL Allen Consulting, Deakin University, Central Queensland University & The Social Research Centre, 2017, *Fourth social and economic impact study of gambling in Tasmania* report prepared for the Tasmanian Department of Treasury and Finance, Hobart.
- ⁱⁱⁱ Victorian Responsible Gambling Foundation 2015, *Background Paper: Risk factors for problem gambling*.
- ^{iv} Department of Treasury and Finance, 2020; *Future of Gaming in Tasmania Public Consultation Paper*, Page 5.
- ^v Victorian Responsible Gaming Foundation, 2019; *Identifying effective policy interventions to prevent gambling-related harm*.
- ^{vi} Productivity Commission 2010. *Gambling: Productivity Commission Inquiry*, Volume 1, Report No. 50. Canberra: Australian Government; Page 201.
- ^{vii} Allen Consulting Group, Problem Gambling Research and Treatment Centre & The Social Research Centre 2011, *Social and economic impact study of gambling in Tasmania*, prepared for the Tasmanian Department of Treasury and Finance, Hobart.
- ^{viii} Tasmanian Audit Office 2017, *Gambling revenue and managing harm from gambling*, Report of the Auditor-General No. 13 of 2016-17.