



Melissa Ford  
Assistant Director  
Liquor and Gaming Branch  
Department of Treasury and Finance  
GPO Box 1374  
HOBART TAS 7001  
E-mail: consultation.lagb@treasury.tas.gov.au

## **Submission of the Synod of Victoria and Tasmania, Uniting Church in Australia to the Mandatory Code Review 25 June 2022**

The Synod of Victoria and Tasmania, Uniting Church in Australia, welcomes the opportunity to provide a submission to the Mandatory Code Review.

The membership of the Synod's congregations have been concerned for a long time about the harms that certain forms of gambling are causing in our communities. At the 1999 meeting of representatives of the congregations a resolution was passed stating:

*To call on the State Government to implement strong consumer protection measures for gamblers through legislation to stop their exploitation by the gambling industry, including:*

- (i) the establishment of adequately resourced, independent bodies to provide consumer protection for gamblers and to enforce legislation and regulations for consumer protection;*
- (ii) the provision for local government veto over the number of machines and new gaming venues; and*
- (iii) the provision of increased funding for recreational alternatives to gambling.*

The 2011 meeting of the congregations represented made the following resolution:

*To urge the Federal and State Governments to implement further measures to reduce the level of problem gambling and other harm caused by electronic gaming machines (EGMs)....*

### **What are the benefits or harms caused by allowing venue operators to advertise gaming machines external to the premises? Are children and other vulnerable persons appropriately protected from the potential harms?**

The Synod supports a ban on all outdoor signage/displays advertising or promoting gaming machines. The Synod would also extend that to a ban on all advertising and marketing of gaming machines in venues as well. Advertising and marketing aims to, at least in part, increase the amount of money people will lose from gambling. There is no way to restrict such advertising and marketing only to people not at risk of being harmed by gambling. People who may be gambling at a level that causes them little harm, can escalate in their gambling if there is an adverse event in their life. The development of stressful life events has been found to be a predictor of future

gambling harm.<sup>1</sup> Such events might be a divorce, the breakdown of a significant relationship, conflict at work, the death of a loved one, or an accident resulting in a physical or mental impairment. Having or developing a mental health problem is also a strong predictor of future gambling harm.<sup>2</sup>

Further, people inside gambling venues are more likely to be suffering harm from gambling than those outside the venue, so they do not need to be subjected to advertising and marketing that is trying to increase the amount of money they are losing.

It is impossible to isolate children from any form of gambling advertising that is permitted and the advertising will negatively impact the behaviour of some of the children exposed to it. Research based on a survey of 3,746 students in years 7 to 12 in Victoria conducted in 2017, found that 35% had been inside a venue where gambling was available. Of the 35%, 25% had been in a pub and 14% had been in a club.<sup>3</sup> The results show that children are highly likely to be exposed to gambling advertising materials in gaming machine venues.

The researchers reported that 30% of those aged 12 to 17 had been exposed to gambling advertising on bill boards and 27% to gambling advertising inside pubs or clubs in the last month.<sup>4</sup>

A higher proportion of children who had ever gambled had visited a TAB, pub or club where people were gambling, compared to students who had never gambled.<sup>5</sup>

Exposure to gambling promotions in the past month was associated with an increased prevalence of gambling in the last month. Of students who had gambled in the last month, 62% reported seeing four or more types of gambling advertising in the last month, compared to 47% of students who had not gambled in the past month.<sup>6</sup>

The researchers concluded that teenagers exposure to gambling advertising was “significantly associated with gambling behaviour”.<sup>7</sup> They recommended there was a need to develop strategies to reduce children’s exposure to gambling advertising.<sup>8</sup>

A study by Southwell, Boreham and Laffam (2008) of older people in Queensland included an examination of gambling venue promotions. They reported anecdotal evidence existed that these promotions promoted extended gambling. The people self-reported that the promotions had led them to an introduction to gaming machines and also to increase time and expenditure spent on gaming machines.<sup>9</sup>

### **What are the benefits or harms of promotional offers like free vouchers? Are there different considerations for player loyalty programs?**

---

<sup>1</sup> Shawn Currie, David Hodgins, Robert Williams and Kristen Fiest, ‘Predicting future harm from gambling over a five-year period in a general population sample: a survival analysis’, *BMC Psychiatry* **21:15**, (2021), 7.

<sup>2</sup> Ibid. 7.

<sup>3</sup> Megan Freund, Natasha Noble, David Hill, Victoria White, Tiffany Evans, Christopher Oldmeadow and Robert Sanson-Fisher, *The prevalence and correlates of gambling in secondary school students in Victoria, Australia, 2017*, University of Newcastle and Victorian Responsible Gambling Foundation, 2019, 1-2, 31.

<sup>4</sup> Ibid., 33-34.

<sup>5</sup> Ibid. 40.

<sup>6</sup> Ibid., 3.

<sup>7</sup> Ibid., 3.

<sup>8</sup> Ibid., 3.

<sup>9</sup> Nerilee Hing and John Haw, *The Influence of Venue Characteristics on a Player’s Decision to Attend a Gambling Venue*, Centre for Gambling Education and Research, School of Tourism and Hospitality Management, Southern Cross University, for Gambling Research Australia, March 2010, p. 21.

The Synod supports a prohibition of venue operators offering free vouchers for any purpose. There is unlikely to be any net benefit to people gambling from inducements, as the gambling business will seek to ensure the increase in losses as a result of the inducements exceeds the cost of providing the inducements. A study of wagering inducements concluded “It may be that inducements effectively pay for themselves where they encourage riskier bets, and thereby amplify operators’ profits and gamblers’ losses.”<sup>10</sup>

Recent research on inducements related to gaming machines in Australia is limited as such inducements have been banned in other states. A 2018 study of advertising and inducements related to wagering gambling found they “encourage riskier betting; increase betting expenditure; elicit attention, excitement, and desire to bet amongst vulnerable gamblers; and have negative effects on all gambler risk groups.”<sup>11</sup>

### **What measures could the Commission introduce to mitigate its concerns about competitive behaviour between venues and increased gambling?**

The Synod believes that loyalty schemes for gaming machine venues should be prohibited as they encourage risky and problematic gambling behaviour. The experience of Crown Casino was that loyalty schemes were more attractive to people with gambling problems, than recreational gamblers. Approximately 45% of people gambling on pokies at Crown Casino used a loyalty card. That increased to 61% for people with a gambling problem.<sup>12</sup>

It was found by Schottler Consulting that attraction to venues due to loyalty points encouraged people to keep gambling on gaming machines, although in contrast it was also found to be non-significant in predicting changes in the urge to continue gambling across all people gambling.<sup>13</sup>

In a South Australian pre-commitment trial some people reported setting their gambling loss limit purposely high so as to avoid losing out on loyalty scheme points, while other indicated they would either increase their limit or remove the limit to ensure that points would continue to accrue.<sup>14</sup> Further, venue staff registering people for the Playsmart system in South Australia reported that some people, on seeking information about the system consequences, declined to register when learning they will cease to accrue loyalty points when they exceed a limit.<sup>15</sup>

Dr Mark Zirnsak  
Senior Social Justice Advocate  
Synod of Victoria and Tasmania  
Uniting Church in Australia  
Phone: 0409 166 915  
E-mail: mark.zirnsak@victas.uca.org.au

---

<sup>10</sup> Nerilee Hing, Alex Russell, Matthew Rockloff, Matthew Browne, Erika Langham, En Li, Lisa Lole, Nancy Greer, Anna Thomas, Rebecca Jenkinson, Vijay Rawat and Hannah Thorne, *Effects of Wagering Marketing on Vulnerable Adults*, Central Queensland University, 2018, 16.

<sup>11</sup> Ibid., 3.

<sup>12</sup> Delfabbro, P., & King, D., ‘The prevalence of loyalty program use and its association with higher risk gambling in Australia’, *Journal of Gambling Addictions*, (2021).

<sup>13</sup> Schottler Consulting, ‘*Factors that influence gambler adherence to pre-commitment decisions*’ Gambling Research Australia, November 2010, 81-82, 86, 93.

<sup>14</sup> *Supporting Customer Commitment, Implementation of pre-commitment*, June 2012, 44.

<sup>15</sup> *Supporting Customer Commitment, Implementation of pre-commitment*, June 2012, 44.