

THE CITY OF
GREATER GEELONG

GAMBLING HARM MINIMISATION POLICY

COMMUNITY FEEDBACK AND SUBMISSIONS

Received 27 October 2021 to 17 January 2022

Contents

Community Engagement Summary3

Table 1: Have your Say Responses4

Table 2: Open Submissions 13

Table 3: Written Submissions 18

Community Engagement Summary

The draft Gambling Harm Minimisation Policy (the Policy) was released for community engagement from 27 October 2021 until 17 January 2022.

Feedback was obtained via an open submission box and survey via the City’s Have Your Say online platform, presentation to the Youth Council, feedback and information sessions for key stakeholders, and one-on-one discussions. These methods of engagement were promoted through social media, print media, City News and targeted emails to stakeholders including industry, City advisory committees and groups, sporting and community clubs, groups, and organisations.

There were 69 written submissions received. Of these, 40 were broadly supportive, 24 broadly opposed the policy and 5 were neutral. The Youth Council voted unanimously to support the draft Policy.

The written submissions can be found on subsequent pages of this attachment.



Table 1: Have your Say Survey responses

Please note that apart from condensing responses and deidentifying data, all responses have been left untouched and appear as they were provided in the written response.

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
1.	Individual	Quite well. In the context that gambling is regulated by the State Government, Council is showing initiative and leadership in attempting to minimise the harms from gambling in our community.	Yes	They are okay. In terms of planning and regulation, local governments are hamstrung by the State Government gambling act and the state planning policy. In the context of this, Council's policy appears to be reasonable.	Very well. It could be stronger in saying that it will actively support clubs/organisations to divest themselves from gambling as a funding source.	They are okay. More detail on partnership arrangements. There are a variety of statewide organisations including: Municipal Association of Victoria; Local Government Working Group on Gambling (via VLGA); Alliance for Gambling Reform; Victorian Responsible Gambling Foundation. Regionally, there is the Leisurenetworks organisation. All of these have different strengths and to would serve to be valuable partners.	Quite well. Some aspiration goals could be included such as not having any organisation which benefits from gambling operating on its land or facilities.
2.	Organisation ties	Noy very well. While the Policy is defined as a 'Gambling Policy', based on the legislation referred to therein and the listed purposes of the Policy it is clear that the true application of the Policy is, quite specifically, for electronic gaming machines	No, it is our respectful submission that the Policy, in its current form, requires further industry consultation and lacks much of the nuance and consideration that is required for an effective policy in an area as complex as gambling and electronic gaming	Not very well. Current government legislation on the planning & supply of gaming machines is sufficient.	Not very well. Sporting clubs like ours continue to provide a safe environment for all participants and continue to facilitate alternative activities that do not involve gambling.	They are okay	Not very well. Impacts from your planned policy will effect our future in the League without their funding & support.

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
3.	Individual	Not very well. I got in touch with this issue via a posting on the Lara Sporting Club website. Let me be clear - I am not and have never been (and will never be) a member of that club. In fact, I am involved with a rival club. However, the LSC post explains that the club is being targeted, by the GHMBC (sic), for reduced funding of sports programs due to their involvement with gaming. It also points out that the policy completely ignores pubs and similar venues. It is ludicrous to attack local community clubs in this way and allow the profiteers whose only purpose is to pray on people to continue unabated. It is an act of cherry picking and demonstrates weak leadership and smacks of bullying and, I suspect, reeks of nepotism. Get rid of this policy!	No, I got in touch with this issue via a posting on the Lara Sporting Club website. Let me be clear - I am not and have never been (and will never be) a member of that club. In fact, I am involved with a rival club. However, the LSC post explains that the club is being targeted, by the GHMBC, for reduced funding of sports programs due to their involvement with gaming. It also points out that the policy completely ignores pubs and similar venues. It is ludicrous to attack local community clubs in this way and allow the profiteers whose only purpose is to pray on people to continue unabated. It is an act of cherry picking and demonstrates weak leadership and smacks of bullying and, I suspect, reeks of nepotism. Get rid of this policy!	Not very well. I got in touch with this issue via a posting on the Lara Sporting Club website. Let me be clear - I am not and have never been (and will never be) a member of that club. In fact, I am involved with a rival club. However, the LSC post explains that the club is being targeted, by the GHMBC, for reduced funding of sports programs due to their involvement with gaming. It also points out that the policy completely ignores pubs and similar venues. It is ludicrous to attack local community clubs in this way and allow the profiteers whose only purpose is to pray on people to continue unabated. It is an act of cherry picking and demonstrates weak leadership and smacks of bullying and, I suspect, reeks of nepotism. Get rid of this policy!	Not very well. I got in touch with this issue via a posting on the Lara Sporting Club website. Let me be clear - I am not and have never been (and will never be) a member of that club. In fact, I am involved with a rival club. However, the LSC post explains that the club is being targeted, by the GHMBC, for reduced funding of sports programs due to their involvement with gaming. It also points out that the policy completely ignores pubs and similar venues. It is ludicrous to attack local community clubs in this way and allow the profiteers whose only purpose is to pray on people to continue unabated. It is an act of cherry picking and demonstrates weak leadership and smacks of bullying and, I suspect, reeks of nepotism. Get rid of this policy!	Not very well. I got in touch with this issue via a posting on the Lara Sporting Club website. Let me be clear - I am not and have never been (and will never be) a member of that club. In fact, I am involved with a rival club. However, the LSC post explains that the club is being targeted, by the GHMBC, for reduced funding of sports programs due to their involvement with gaming. It also points out that the policy completely ignores pubs and similar venues. It is ludicrous to attack local community clubs in this way and allow the profiteers whose only purpose is to pray on people to continue unabated. It is an act of cherry picking and demonstrates weak leadership and smacks of bullying and, I suspect, reeks of nepotism. Get rid of this policy!	Not very well. I got in touch with this issue via a posting on the Lara Sporting Club website. Let me be clear - I am not and have never been (and will never be) a member of that club. In fact, I am involved with a rival club. However, the LSC post explains that the club is being targeted, by the GHMBC, for reduced funding of sports programs due to their involvement with gaming. It also points out that the policy completely ignores pubs and similar venues. It is ludicrous to attack local community clubs in this way and allow the profiteers whose only purpose is to pray on people to continue unabated. It is an act of cherry picking and demonstrates weak leadership and smacks of bullying and, I suspect, reeks of nepotism. Get rid of this policy!
4.	Rather not say	They are okay. Policy could be written in more layperson terms.	Yes	They are okay	Quite well	Quite well	Quite well. Appropriate and align with community expectations

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
5.	Individual	Quite well. While I have enjoyed the occasional time on EMG's in Queensland, I have personally seen how addictive it can become. I have not joined any club since arriving in the Geelong area that has EMG's. I was entertaining the idea of joining the Clifton Springs Golf Club but except for playing golf, an overpriced bistro and EMG's there was nothing that interested me.	Yes	Quite well. I can't think of any improvement at the moment. The best place to engineer ideas would be to have a wide-range of talented people of interested parties to engage each other in a spirited debate.	Quite well. Refer above idea but include people from experienced backgrounds from specialists, health and wellbeing organisations.	Quite well. This could be included in the committee referred to above.	Quite well. This requires a experienced steering committee that will peruse the ideas and thoughts of all the committees to form policy statements. This committee would have to be carefully selected to make sure that all the points get an even hearing. I would suggest that each area committee elects the person who they think has the greatest ability to be able to highlight the most important issues to draft policy.
6.	Organisation ties	Very well. I think you're moving in the right direction	Yes	Very Well	Very Well	Very Well	Very well

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
7.	Individual	<p>Quite well. The underpinning principles create clear scope for the policy in defining:</p> <p>a) the type of gambling under review (problem gambling arising from EGM abuse),</p> <p>b) what is at stake (public health and wellbeing), and</p> <p>c) the parties or agencies responsible for driving change (the City, land use planning and Council's regulatory and legislative departments).In the context of this policy, I feel that addressing 'problem gambling' should not be confused with the 'right to entertainment' – there is nothing entertaining about problem gambling. Therefore, and in light of community organisations that generate revenues from gambling, perhaps rephrasing the underpinning principle that states: 'the need to balance the right to entertainment with the need to promote wellbeing' to 'the need to balance the right to undertake legal revenue-generating activities with the need to promote wellbeing' may better guide the intended outcomes of the policy.</p>	Yes	<p>Quite well. This section is good however in my opinion, 'promoting sound planning' also means supporting community stakeholders who are attempting to make investment decisions for their clubs/venues etc. Perhaps this section could be improved with the addition of a policy statement that focuses on Communication of regulations to ensure that these stakeholders can make better, timely decisions that are aligned with Council's public wellbeing aims.</p>	<p>They are okay. This section is clear however an additional statement on support for people struggling with gambling addiction is needed. People who are struggling with addiction need more than 'alternative social and recreation choices' and they need more than the 'promotion of safe and responsible gambling practices'. Many of these people are already acutely aware how there behaviours are negatively impacting their lives and the lives of those around them. They (and their loved ones) need access to compassionate, free, discreet and evidence-based support services.</p> <p>Also (and this may be already addressed in the referenced strategy documents), but clear and evidence-based metrics on baseline community health and wellbeing versus targets post-policy implementation would be valuable in measuring the success & progress of the policy. A policy statement that indicated what target metrics were being sought may be a useful way to introduce transparency and accountability to the policy.</p>	<p>Quite well. Community organisations that derive revenues from gambling related activities will need support to transition away from these revenue streams. Change is difficult, especially when impacting revenue, and resistance to change within community organisations will create significant headwinds for the policy.</p> <p>Perhaps there is an opportunity to improve this section with specificity on how 'Capacity Building' relates to supporting change management within these organisations.</p>	<p>Quite well. The policy statements, taken as a whole, demonstrate the valuable role that Council leadership can play in gambling harm minimisation.</p> <p>However, some of statements could possibly go further. For example, rather than simply 'encouraging' clubs to allocate their gambling community contributions to harm minimisation services, why not mandate it and enforce contribution allocations to align across the supply/demand/harm reduction categories? Additionally, rather than simply 'prioritising' grant funding towards clubs with harm minimisation programs, why not have demonstrable harm minimisation programs as a pre-requisite to any funding?</p>

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
8.	Individual	Very well. Taking a whole of organisation approach to harm minimisation, recognition of the harm caused to families and other loved ones, recognition of the impact of local land use planning	Yes	Very well	Very well	Very well	Quite well. In the context of reducing and managing the current number of EGMs in Geelong, advocate to the state government for a review of the current EGM cap in Geelong - I assume this would be for a reduction of EGMs and think it would be better if this was explicitly stated and worded stronger. Many of the effects of gambling are experienced at a local level and it is this level of government that should advocate more strongly to reduce EGMs
9.	Individual	Quite well. It considers all stakeholders, supports EGM users and owners and recognises the need for a public health approach.	Yes	Very well. Focussing heavily on Statutory Planning, including requiring a EGM application to include a well-reasoned and researched cost-benefit analysis on the community in which the application is occurring in.	They are okay. A focus on gathering and collating robust empirical statistics on the COGG specific population (age, sex, economic status, employment status, times of the day use is occurring etc.) that are utilising EGMs. This will then inform strategies to specifically target this population to support reduction of EGM use and promote replacement behaviours within the cohorts. A public health approach is critical.	Very well. Partnering with local institutions is vital, particularly research and program delivery.	Very well
10.	Individual	They are okay. They don't go far enough	Yes	Not very well. These need to be banned, not limited	Not very well As above, banning not limits	Not very well	They are okay
11.	Individual	Quite well. Good	Yes	They are okay	Quite well	Very well	Quite well

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
12.	Individual	They are okay. The are on the cusp of thinking about intersections and the role other factors play in engagement with gambling (specifically "The impact of electronic gaming machines should not be unevenly distributed through communities or populations.") But doesn't have much recognition or exploration of what these could be and certain populations feel like they are not as well considered in the rest of the draft (I believe as a result of this issue in principals)	Yes	They are okay. "Vulnerable communities" in this instance is limited in definition because there will be vulnerable population/communities throughout COGG. This implementation focuses on very specific types of vulnerability, and it needs to be considered that this isn't as black and white as a certain area/clearly specific group	They are okay. I think more acknowledgement needs to be given to the improvement of health and wellbeing services. There is honestly a shortage of services (medical/mental health/etc) and social engagement that may assist in the COGG area Support for clubs etc to transition is great	Quite well. More links to community groups and services	They are okay. The last point "Ensure the community grants program prioritise organisation....." is a bit concerning to me because it's making it harder for those organisations to diversify the way that they make income or fund certain projects if we're taking away possible Grant opportunities that could assist in reduction of reliance on gambling as a source of income. I would also ask if council has similar guidelines to "Not hold Council or City meetings, community events, activities, programs and social outings in venues that have EGMs" with regards to other issues that may impact attendance and well-being (E.g do locations have to be near public transport, do they need to be wheelchair accessible, do they need to be child friendly, affordable for community etc).

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
13.	Organisation tie	Not very well. I consider that no matter what the 'underpinning principles' are, The Council should concentrate on its basic and traditional roles and if it is has to consider a 'gambling policy', it should concentrate on those gambling activities that do not result in community benefit provided to residents from local licensed sporting clubs. The draft policy, instituted by a Councilor or an unelected staff member, is not comprehensive and takes the easy option of concentrating on EGMs.	No, I do not think they can be improved. As a matter of fact, I think they are self serving and are listed to generate confusion regarding the draft policy. (See Below for detailed assessment of the supposed 'priority areas').	Not very well. In the past the Council has squandered ratepayers funds in excessive legal costs to fight local sporting clubs in the relocation and allocation of EGMs within the municipality under the provisions if the Victorian Planning Provisions and the Victorian Commission for Gambling Regulations. Not only has the Council been unsuccessful in most instances, it has cost local sporting clubs additional thousands of dollars in legal fees that could have been utilised in many other ways to benefit the local community In the 2008 Productivity Commission on Gambling Volume 1, it took until page 612 of a 632 page report until it considered local government into the process. Victoria is the only state that provides Local Government access to the allocation and location of EGMs.	Not very well. Advice Note No 1 to the 2021-2025 Municipal Public Health and Wellbeing Plan issued by the Victorian Government does not mention gambling, gaming or EGMs in its advise on how to Councils will prepare their plans. This mention of this 'wellbeing plan' is an attempt by the Council to justify their preparation of a policy that is against EGMs but does not address the hard aspects of alternate forms of gambling.	Not appropriate at all. After losing on so many occasions at VCAT at great expense to not only the ratepayer but members of local sporting clubs, the Council is using smoke and mirrors to hopefully gain support to continue the battle against local sporting clubs. Council already has the power to 'influence the location, management and operation of EGMs within the municipality', so why would it need further 'partnerships', unless it is to present them at VCAT in opposition to local sporting clubs that have approval and licenses from the State Government for their EGMs	Not very well. Some of these Council Leadership statements may be beneficial to the community as a whole if the draft policy main objective of the draft policy is to further limit local sporting clubs in the benefits they provide to the local community. If the Council insists on a Gambling Policy, make sure it is a gambling policy and not an anti-gaming policy! Look at all the other forms of gambling that people can do in their own home or by pulling their mobile phone from their pocket. twenty four hour on line gambling and sports betting is a far larger, (but Harder) target to concentrate on.
14.	Organisation tie	They are okay. They are blinkered and I believe out of touch with society and not recognising the difficulty community groups have in raising funds to stay competitive in this market. Council costs and restrictions hamper development. Council want to change our course with no regard for the impact it will have and still want to restrict how we get our income.	No, there has to be a way on how to move forward without destroying something members have worked very hard to gain, that being our reputation	They are okay	They are okay. Allowing venues to be able to be more a of the decision making and getting a balanced opinion	They are okay	Not very well
15.	Organisation tie	Quite well. Principles are assuming we have to have EGMs and therefore deal with the issues	Yes	They are okay. Why do we need EGMs at all?	They are okay. The health of all people family members and friends is still second to the perception we need EGMs	They are okay. What would be the impact of not having EGM gambling in COGG?	Not very well .Toothless! Pretty sure COGG own buildings like Lara Sporting Club, which have EGMs installed
16.	Individual	Quite well. Without full consideration of the extent of powers to influence how gaming is regulated in Victoria, it appears Council has considered everything which falls within their area of influence and control.	Yes	Quite well. Perhaps, maybe too gradual, but explore how council rates on commercial properties can be used to incentivise/decentivise EGM in existence in region.	They are okay. Think there needs to be an alignment between the Health and Wellbeing and planning/permits. For example, if there is an understanding that EGM create health issues then promoting safe and responsible gambling practices needs to also reference 'by influencing approval permits with relevant limitations/obligations'.	Quite well	Quite well. As previously mentioned, Council might like to use its leadership to apply council rates in a way to effect change of business use of spaces.

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
17.	Individual	Very well. They cover a broad range of aspects around the issues of gambling.	Yes	Very well	Very well	Very well	Very well
18.	Individual	They are okay. I think the policy needs to have a focus more broadly on gambling - not specifically EGMS. This would include community members using internet betting, online casinos and EGMS, TAB online and in hotels in greater Geelong.	Yes	Not very well. I think council should take the stance to deny increase of EGMS in the first instance with the hotel having to make the case they aren't harmful in their community (when they increase).	Not very well. I was involved in the community grants assessment and whilst I was appreciative the question was added - do you receive funding from EGMS, I think it needs to go further - are the organisations on land that hosts EGMS (eg Bell Park Sports club), does the organisations meet on land that has gambling services (ie hotels that have TAB facilities), that grant applications shouldn't be hosted on land that has gambling venues.	Not very well. Council should be more proactive with support services such as Gamblers help at Bethany - they were in the past - but don't seem as connected these days.	Not very well. I think council members and council staff in leadership should attend gambling harm workshop to understand the impacts on their community.
19.	Individual	Quite well. Because I'm sure there are more ways to work on the problem in our City but this policy is a good start.	Yes	Quite well It seems the policy is centred around applications to put more machines in our City. We need to mandate reducing the current number of machines.	Quite well	Very well It is an important section of the policy.	Quite well
20.	Organisaiton tie	They are okay. Our involvement in egm,s has given our clubs a sense of survival as any profits that are received go back to our clubs to assist in renovations of club rooms etc which are all on council or crown land. The taxes that state gov receive also comes back to councils in grants etc. There is a lot more to support my concerns about council going outside there respective policies and portfolio,s.	No, Council should stay out of trying to control legitimate businesses	Not very well. Stay out of legitimate businesses.	Not very well. Council to stay out of legitimate businesses. Stay within their portfolios.	Not appropriate at all. As previously stated stay out of legitimate businesses.	Not appropriate at all. Stay out of legit businesses.

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
21.	Individual	Quite well. I think that the principles are very desirable but wonder if more can be done to help people take more control of their gambling. While I have little interest in EGMs personally I have heard that it can be useful for people to have set limits to the amount they spend, small amounts to be able to be bet so vast amounts of money are not gambled in a short period of time.	Yes	Quite well. This whole area needs to be strong. Perhaps constantly keeping people informed about how much money is gambled and taken out of the community. It is vital that no more EGMs are allowed into our community.	Quite well. Again it is so important that people are encouraged into other forms of activity other than gambling. Educational campaigns need to be strengthened.	Quite well. It is very important for gambling not to be promoted or advertised. I have heard ads for betting on Geelong radio and wonder if the radio leadership can be encouraged to stop or at least limit this when especially vulnerable children are listening. Maybe the amounts of money spent on gambling could be highlighted in radio programs and people encouraged to think about what this money could better help our community. Also the disparity between money from gambling spent versus money "donated" back to the community from gambling.	Quite well. Again it is very necessary to reduce the large number of EGMs in local hotels and venues. Surely there are far too many. How many are actually going to be decommissioned. Perhaps this needs to be reviewed every year rather than 4 years.
22.	Individual	Not appropriate at all. Contrary to you committee and its draft. Gambling on poker machines is a social activity is utterly false. People using the machines usually don't talk to other gamers. I have watched and studied people using the machines. The only time people talk to others is when they have a coffee break or go to the toilet.	Yes	Not very well	They are okay	They are okay	Not very well
23.	Individual	They are okay. Doesn't seem to be enough. They are good ideas and people can say yes we have this in mind but it doesn't seem to measure achievement of the goal or make any laws.	Yes	Not very well. Needs more, For example no EGMs can be operated through out the council area between 2am and 9am	They are okay	They are okay	They are okay. Needs to be increased
24.	Individual	They are okay. I do not believe that the policy is strong enough in working on the prevention side of things. An example would be I see nothing about limits on gambling especially to those who are ordinary workers , or say if they were from Norlane there financial situation may be quite limited. Could you stop such people if they were spending a lot of money.	No, I believe you need to have as an overriding principle Health and Well being need to be No 1 No 2 is Council leadership. 3 Partnerships and Advocacy 4 Planning and Regulation.	They are okay. The machines need to be strictly regulated and penalties given for non compliance. It needs to be seen that human beings will be looked after sometimes despite themselves .	Quite well. More education on why alternatives are better for families and relationships generally. Perhaps it can be pointed out excessive gambling is often a solo activity leading you away from others, rather than towards them.	Quite well. Perhaps more information given on what the Council is doing, and what it intends to do.	Quite well. The statements are good, however can only be judged by what people see the action that the Council takes on the ground.
25.	Individual	Quite well. I would like to know who will have oversight of the policy mandate to ensure planning procedures are adhered to in the best interest of community public health and not revenue raising efforts for council?	Yes	They are okay. Community feedback opportunity for the application process	Quite well. I think HWB should be advocating for no more EGM's in Geelong. Funding and supporting services are a band-aid fix. Prevention starts with banning machines altogether.	Quite well No comment here	Quite well No further comment for improvement

	Individual or organisation ties	The policy outlines several underpinning principles to be considered when looking at gambling harm minimisation. How well do these principles capture how we should be considering gambling?	Do you think these priority areas are suitable and relevant to the draft Gambling Policy	How well do the policy statements promote sound planning of EGMs?	How well do the policy statements reflect Council's and the City's aim of promoting and supporting recreational activities?	How well do the policy statements reflect the need for the City to create meaningful partnerships with other organisations?	How well do the policy statements reflect the actions Council and the City will take over the next four years to reduce gambling-related harm within the Greater Geelong community?
26.	Individual	Quite well. The council will apply all available opportunity to restrict available gambling - as it is legal and can't be banned, and address it as a public health issue	Yes	Very well. Just have competent people implementing your objectives as outlined	They are okay. It's OK - ends up by promoting "responsible gambling practices" The betting companies use that term in TV advertising. No one ever defines it. What is responsible gambling practice? Only betting what you can afford to lose? What can you afford to lose? is any gambling able to be defined as responsible???	They are okay. Very general, well intentioned, imprecise.	Very well. Banning it on anything Council owner is great leadership - even council WiFi Great stuff. Re the last question below- no area for comment. I DO NOT GAMBLE , maybe 4 tats tickets a year. I am pleased to see you having a go - so I am impacted in the sense of being pleased with your efforts
27.	Organisation tie	They are okay. After reading the draft policy, I believe it doesn't adequately consider the financial implications the policy would have on a Club or association that are required to phase out EGM's. Being a member of a non-Council owned Club with EGM's, the Club would simply not be financially viable enough to maintain/repair the building relying on food and beverage service and functions alone.	Yes	They are okay	They are okay	They are okay	They are okay

Table 2: Open submissions

Submission via have your say	
1	<p>The whole issue on gambling is just not on Poker Machines & highlighting Buckley's as one of your targeted offenders. Nearly every single Football and Netball would not be able to survive especially before covid started and some 20 months later that this current Council has decided to impose a huge penalty on those who receive hundred of thousands of Dollars from not only Buckley's but nearly all of the Hotel's that having gaming machines and other machines for gambling on any sport from racehorses to football betting. I was speaking to the Geelong Umpires recently and they said they had missed out on 2 grants because of their accociation with Buckleys. Local Football, Men, Women, Under age Teenagers,Girls & Boys play a huge role in the community including Netball. Without the sponsorship, donations as the almighty dollar dry's up over the past 20 months due to the COVID 19 Pandemic some clubs are already weighing up their future. I am not sure whether the Council in Geelong are going to pick up the shortfall and interestly enough I see in a Council mail out that I received with your cuurent Mayor attempting to leave her post and try her hand at Federal Politics abd one of your current councillors in recent times has decided to play an interesting card and head up AFL Barwon. I cannot remember when a local ward councillor has ever done that sort of thing. Certainly in my time on Council in Geelong 1995-1998 I think we were paid \$12,000 p.a. All forms of Gambling have beenquestioned by some and not by others. When the Pubs got the nod in front of the clubs that was a big mistake so are the same set of rules going to apply for Pubs, as they are for Buckley's, The Leopold Sports Club, The Croatia Club, White Eagle House, Clifton Springs Golf Club, Portarlingto Golf Club and the list goes on and on. Just because the Geelong Football Club in the end got themselves slowly out of poker machines surely that's not the same for some of the local clubs in Geelong that will cease to exist if two things happen the Council votes to adopt the Policy, this leaves the club's stranded, losing massive sponsorship and a trickle of money in grants. I spent 10 years in Ballarat every single Ballarat Ground in the Ballarat Football League had all their grounds brought up to AFL Standard. Ground Surface, Goal Posts, Fencing, Size of the Grounds the same as the MCG, electronic scoreboards and change room upgrades to cater for both genders Female and Males. The Ballarat had a vision and delivered not involving the Ballarat Leagues Club and all the gaming issues in Ballarat. Some common sense prevailed. In Geelong, Bellarine Peninsula and the Surf Coast nothing but the odd patch up job a few light towers and a few other things no real plan like Ballarat. Instead of mingling in politics in local football the Councillors and Mayor haven't delivered on much like the Graffiti pandemic, the CBD a ghost town, Strip Shopping Centres businesses have gone broke, suicide rates have never been higher. If your policy gets up I would hope that Cr Harwood would abstain from voting as he now has this conflict of interest or on any vote when it comes to this policy or any policy that relates to AFL Barwon & the Local Clubs. The backlash to all of this is enormous is the council going to include Bingo and with the stroke of a pen the Council is going to ruin local sport in Greater Geelong nad the Surrounds.</p>

- 2 1. Change the name of 'Gaming' on any advertising or signage to 'Gambling'. It is not a game.2. Most outlets have membership cards that they use in the machines to gain 'points' that are used to encourage use of EGM's besides the 'wins'. Could these cards have cash inputs registered on the cards and keep records of how much is invested and other worthwhile information like the number of times cash is deposited and dates by each card? Do do this cash deposits directly to the machines would have to stopped and cash slots removed. When a member has reached the cutoff limit, the card switches off and prevents any more cash being deposited.
- 3 the control is not always within the bounds of council and what is required is a change in policy by the state government who issue the machine licences for an area. All the council is effectively doing is distributing those licences amongst the venues, if a venue decides to move away from gaming as a revenue source the machines will re-appear in another location and the struggle continues. If you want a more positive outcome then you need to reduce the total number of machines per head of population and reduce the total number of machines within the region. I would think in order to reduce gaming and influence of gaming that all machines licences held by a venue be required to disclose how much revenue in total the machines took in the last year and how much prizes the machines paid out both for the total number of machines and and average per machine. The required signage to be placed in the entrance of any gaming area. We made smoking socially unacceptable by making it more difficult and we need to do the same with gaming. Governments also need to clearly have in their accounts what they make on gaming in revenue and taxes in particular around elections which we are about to embark upon. Governments are as addicted to the gaming revenue as the punters are in putting in their cash
- 4 Dot point 10 & 11 on page 10 are completely unreasonable for sporting clubs that have an association with entertainment venues. If a sporting club has an association with an entertainment venue Council are prepared to distance themselves from community support and involvement based on a moral opinion. You are prepared to hold a gun to our head and say choose between ongoing support or fall into line with Council and we will drip feed you support when it suits you.
- 5 Good Morning, I believe the draft policy is very good however I've identified one gap. As part of harm minimisation I would love to see the city commit to gender equity principles in this policy such as investing in support programs and services that promote financial independence for women/partners of gamblers in order to minimise the risks and ramifications they might be exposed to with gambling. People in abusive relationships are more likely to have less financial control and independence therefore putting them in a vulnerable position to be exploited. It would be fantastic to see Council include and commit to this in the Gambling Harm Minimisation policy and consult with regional and statewide experts on the best way to do this.
- 6 I am concerned that by asking our local club to completely remove gaming from the venue would significantly disadvantage our club. I believe this is the case as we would be disadvantaged in regards to applications and grants as others will be given preferential treatment. We are also a relatively small establishment in regards to gaming and should not be treated the same as larger venues. We would also be disadvantaged if we were to try to transition to other funding methods as we will be without a financial support equivalent during this transition. Our local clubs are not as well off as others and any fluctuation in available funds will be at a significant cost to facilities and supplies for our children's sporting teams. Please reconsider the proposal to account for small sporting clubs who could potentially be crippled by these changes.
- 7 I believe the Council is misguided and inconsistent with this policy.
- I strongly disagree with the overall policy and its motherhood statements and goals.
- I believe there is little doubt that alcohol causes more damage to the community and the individual.
- If The Council was to propose that any person who consumes alcohol or who serves alcohol (whether for a fee or free) they would be prevented from serving on Council or receiving any remuneration from such organisations (including Council employees) this would be laughed out of Council and the community. For instance, a bigger priority would be to ensure if the Council or its staff hold Christmas parties/functions no alcohol would be served. I wonder whether Council members and its staff would share such a view?
- Does The Council itself receive rates/funds from gambling venues or organisations that have EGM's or people that own such facilities, indirectly or directly? This question should also include money from the State or Federal Government that may make grants to Geelong which have clearly raised taxes from the gambling industry. I presume the answer is YES. The obvious point becomes should The Council be consistent and refuse to receive such monies otherwise The Council is happy for it to fund its own operations with money from gambling/EGM (directly/indirectly) but not for other organisations (such as sporting clubs) who have less avenue to raise funds. The Council can also raise rates from other parties excluding gambling facilities and see what the reaction would be from ratepayers who then carry the burden for such morality.
- The view and argument that gambling (including EGM) is some how wrong and ethically inappropriate I challenge. The Policy acknowledges that such activity is legal and impacts a small number of people. It also provides a lot of harmless/enjoyable entertainment for the majority. For people with problems The Council should be targetting the problem gamblers not punish the majority and organisations who are providing a desired service.
- I believe more endeavour should be targetted to alcohol. I am aware that alcohol has caused far more rapes, deaths, car accidents and generally disgustingly bad behaviour than EGM. Target an industry far more dangerous than EGM. I saw my elderly parents playing the "pokies" and in their 80's & 90's it gave them a lot of pleasure/entertainment which as they were frail were largely denied in other activities. Do not punish a large group of people because a small number of people do the wrong thing.
- I believe any Council member or employee who may be involved in this Policy should declare any interests they may have. For instance, if a member/employee is a member or a family member is part of a sporting club/organisation that does not have EGM/gambling presently this policy clearly could benefit that club/organisation and it should not only be disclosed but those clubs/organisations should agree to forego any future funding/grants from the Council so as to avoid any conflict of interest.
- It is wonderful that Council is taking steps to improve the citizens of Geelong but should not be one that will benefit other parties that may be associated with Council members or employees. A full audit of such associations should occur so that a full picture is presented.
- In summation, the Council should not be adopting the policy for many reasons including;
- a) It is not their role to make moral and ethical judgements which are flawed. EGM/gambling are legal and give a lot of pleasure entertainment to a lot of people. The vast majority have no problems. Target the problem people specifically not a scattergun approach;
- b) I do not believe the people who are proposing this (eg Council members/employees) are adequately disclosing the conflict of interests that may exist;

c) To be consistent The Council should refuse to accept any monies that indirectly/directly may come from such operations. Do a root and branch analysis where all funding comes from including any grants that may have been funded directly/indirectly from gaming/EGM revenues. To adopt this "morally and ethical" position would be wonderful however it would cause I am sure quite serious funding issues for the Geelong Region. Let Geelong Council sort this issue themselves out first before they make smaller sporting clubs and other organisations face this funding dilemma issue. Lead by example;

d) Focus on alcohol related issues in far more depth before EGM. In other, words get your priorities straight;

e) You have a city that is not reaching its true potential. There are a lot more important issues you can focus on. A lot of government schools in the Geelong region are underfunded and struggling. Education, I appreciate is a State responsibility but you would be better getting more funding for these schools than manipulating clubs/organisations funding to achieve a misguided goal and

f) If you are going to target gambling policy in this way you should be getting rid of the public holiday for The Geelong Cup. After all, inconsistency and hypocrisy is hardly a strong foundation for a moral and ethical policy. You can not be a little bit pregnant.

8	I fully support the absolute removal of these machines. They bring nothing positive to society
9	Hi, I have read the policy and don't agree with it, I think many clubs are sustained through gaming machines, without them you will see a dramatic increase in clubs asking for many and clubs unable to stay afloat.
10	On behalf of my children and grandchildren who use the facilities at the Lara Sporting Club I wish to lodge my complaint against the discrimination against the sporting club if they are excluded from any grants that may be applicable to them. The money from the TAB and Poker Machines are poured back into the local community and any exclusion would be very detrimental to the Club
11	All these clubs have suffered enough with covid that I feel cutting the finding will make it tough for all clubs to survive. Our kids have lost far too much with missing out on playing sport due to covid that these funding cuts will definitely make it really tough on the kids all ages.
12	I would like to express concern over the new gambling policy. Our sporting club is a community club who give back to their sections and do not fill their own pockets with profits. To have them grouped under this policy is concerning and completely unfair. By not allowing our club to apply for grants, our children will be severely disadvantaged against other sporting clubs.
13	As a member of a community club with children involved, I believe this is going to disadvantage our children. Our club is a non for profit club with money going back into the community. If you stop or minimise our clubs funding it is going to hurt our children.
14	The labour government created these poker machines instead of leaving them in NSW clubs. The labour government made one mistake by granting gambling licences to hotels instead of only granting community clubs with licence were the give profits back to the local community. The Lara sporting club does not make great profits but they still give back to the community of Lara And encourage local kids to participate in sports eg football cricket ,netball . The council wants to play god on people who play the pokies or betting on racing people do not have to play . Without grants to help build infrastructure you are robbing your rate payers of access to these funds to help make the facilities at the locals clubs better so I ask the council to reject the proposal . If the local clubs have to rely on profits from gambling alone the clubs would not be able to fund upgrades . Thank you for listening to me if you need to contact you can ring me.
15	I wish to voice my opinion on your new policy. As with some other sporting facilities involved with Pokies i wish to add my support behind the Lara Sporting Club to allow the Club to still be able to receive Council grants. The money from the pokies goes back into our community and helps run our Junior, Senior, Cricket, football, netball, soccer, baseball and other groups to improve and encourage our community to be a true community. i believe as we all pay rates to our City, one would expect an automatic inclusion in this process of distributing funds back into our Town. Lara has one of the top number of Juniors in our town playing sport and it has always appreciated the help with this.
16	Lara Sporting Club: The policy writers have been mis-informed on gaming. They do not seem to understand what a community club is and how our profits are completely re-directed into our members, our facilities, the community and charity groups. Just ask our Lions and Probus groups as well as the Lara Care Group and many more. The policy writers are including hotels and pubs in their figures and data. These are 'profit' organisations that do not have considerations for the community. Community clubs make up 'considerably' less in patron expenditure than the money making hotels and pubs but they're not separating that data. My kids play football and cricket for the Lara Sporting club and this will directly impact our kids.
17	To Whom it may concern, The decision to exclude community clubs in this policy is utterly ridiculous. Most of these Clubs would not survive without funding of some sort and to even consider taking away their right to apply for grants etc. is unfair. Over the last 10 years Council has gradually eroded away the assistance it should be providing to communities of all ages to participate in recreational activities. With the increased amount of new rate payers and children in the Geelong Region over the last 10 years Council should be looking at INCREASING recreational activity and not the possibilty of DECREASING THE OPPORTUNITY by excluding them from assistance to run their clubs.
18	The draft policy will severely impact local sporting and social clubs who rely on poker machines for important funding. Withdrawal of funding to clubs, which were originally intended to benefit from pokies, (rather than pubs), will mean that our kids and grandkids will miss out on badly needed facilities and equipment currently funded by a mix of gambling revenue and government grants. Please do not discriminate against local clubs that rely on Pokies and TAB for survival.
19	I have grave concerns for the negative effects this will have on the kids in sport. If the Lara Football Club cannot apply for grants then how can they remain competitive against Clubs that weren't proactive in building a business!? I want my kids to play for a great team, this policy will stop that from happening. I dont play the pokies but I know the sporting club spends their money on the kids and the sports. Stop gaming advertising, stop more pokies, work with places to reduce gaming harm through programs, DO NOT cut off the legs of clubs like the Lara Sports Club who do a great job for this community.
20	Sporting club sponsorship by pokies is abhorrent. Gaming machines are harmful to the community and should have nothing to do with sports, physical activity or recreation.

Submission via have your say

21	We should close all pokies venues and aim to be a 'gambling-free' city. Alternatively, they should be required to minimise their hours of operation and donate a % of profits to the public healthcare system and/or gambling related charities.
22	I am pleased that a harm minimisation framework is being developed. I hope that the number of EGMs can be significantly reduced. I am also wondering if existing machines can have preset limits so people can be less enticed to keep gambling. I would also like to have less advertising of gambling on our local radio. Maybe more promotion of help for people who gamble can also be extended with more posters and on line information in libraries, schools,supermarkets and community centres.
23	Gambling may be legal, but it is an addictive and destructive activity, just like drinking alcohol. Both of these are a blight on our society. I remember when we had no poker machines in Victoria, and Pokie bus trips to the border were popular- but they were an event, an occasional weekend away. Punters were not spending their weekly earnings on them, forcing their families into poverty. It isn't just the loss of money, but the obsession and compulsion that tears people away from spending time with their loved ones, breaking relationships. All advertising by gambling companies should be banned, and no further pokie venues or increase in machines should be permitted, for the sake of our society.
24	I am concerned about the amount of money that is gambled on EGMs. But apart from the economic impact on families, there are social issues associated with the addiction to the EGMs. People become isolated and hide their addiction from friends and family. I would like to see stronger limits put on the amount of money allowed to be gambled on a single day. And this should apply to multiple venues, so that gamblers can not go from one venue to another.
25	The policy looks great, I like the part about supporting companies to rely less on gambling products by assisting with a business plan. This would need a strong message for it and very clear incentives for businesses to consider since a lot of reliable income is generated from pokies. Also the part about support organisations with initiatives for alternatives to gambling. This is an approach that has often been unsuccessful in the past. This is mainly due to the type of activities offered, the frequency offered and the short term roll out. I think to really execute this element it would be good to consult with people who play the pokies and see what activities they would like. There would need to be a strategies to build social connection through this too, not just host events and hope for the best. I think the policy could be more broad in terms of other gambling products such as sports betting and wagering which for the first time in 2020 overtook pokies expenditure. Sportsbars etc. are unregulated compared to gaming rooms and more popular with young people. Young people could be more considered in the policy in terms of their most commonly used forms of gambling. An idea for this could be looking at the 'mateship' angle that companies like SportsBet are using to entice young men to gamble. It could look like partnering with an organisation like Mr Perfect or HALT.
26	Poker machines were originally directed at clubs like RSL & Sporting bodies, the AHA Association some how got their foot in the door and reeked havoc on society by promoting gaming in hotel they have ruined so many lives, it's time to wind poker machines back. Hotels should never have been given poker machines the benefit to the public is zero, in pubs food is no cheaper and drinks are dearer than clubs that have them, in fact poker machines in pubs are just lining publicans pockets I don't see pubs doing anything to benefit the community with profits from pokies, so we need legislation that only allows recognised clubs to have these machines and they must show that any profits from these machines helps the community, I see this at my local RSL they support veterans with the profits from these machines they also subsidise food and drink and activities in the clubs and community support. You won't see any of this in pubs in Geelong that have pokies, there are way to many pubs in Geelong and surrounds that have these machines and it's time to take them out of hotels.
27	Great initiative. Love the blocking of gambling websites on public wifi. Without easy access, gambling, and therefore financial losses, might be reduced. If I can't do it, I won't do it. (Not that I do anyway but you get my point) Tattslotto is gambling. Raffles are gambling. Cash Cow is gambling. Let's remain realistic. Many community groups rely on raffles to gain funding. Some are formally organised but many are ad hoc mother's/father's day events, or suddenly raising money for a participant in need, or a Christmas raffle etc. I would hate to see these sorts of gambling banned or made so difficult to do that services are impacted due to reduced income.
28	Restrict the number of machines to the point where viability becomes marginal for the operator taking into consideration compliance costs and alter operating hours. Gambling is an addiction and needs local support services to identify vulnerable groups and offer treatment in a supportive environment. There's little point if we just send problem gamblers to another platform such as online. Offer diversionary activities with groups which then benefit the community as a whole, encourage a positive replacement activity that builds self worth and value to the individual.
29	Dear CoGG, I note the focus of the draft policy is the limitation of demand, supply and harm accorded to EGMs via licensing regulation. Can I add that as well as the number of these machines and their placement in venues subject to liquor licensing laws, the length of time they are allowed to operate would seem to be in line with the liquor licence. I would like to see separate time frames for EGMs. eg: 8pm to 11pm. That is, NOT available during the daytime, or on way home from work, but after dinner. Thank you for looking into this problem and the impact on some of the most vulnerable in our community.
30	Policy seems good but I would prefer it went further. EGM's in Hotels and commercial business's should be eliminated over time. I object to private business's making obscene profits at the expense of gambling addicts. Perhaps solid forced reductions by 15% per year. Strongly support not for profit clubs being assisted to get out of EGM's Do not believe gambling addicts would exercise as an alternative. Would prefer changes to pub opening hours and adding windows and clocks,

Table 3: Written Submissions

	Author
Submission 1	BSP Lawyers on behalf of CCV
Submission 2	Bell Park Sport & Recreation Club
Submission 3	Bethany Community Support
Submission 4	Community Member
Submission 5	Community Member
Submission 6	Community Member
Submission 7	White Eagle House
Submission 8	Portarlington Golf Club
Submission 9	Lara Sporting Club
Submission 10	East Geelong Football Netball Club
Submission 11	Community Member
Submission 12	Youth Council

10 December 2021

Social Equity Officer
City of Greater Geelong
30 Gheringhap Street
GEEELONG VIC 3220

Dear

Draft Gambling Harm Minimisation Council Policy 2021

Community Clubs Victoria (**CCV**) is seeking to make submissions to Council in respect of the draft *Gambling Harm Minimisation Council Policy 2021 (the Policy)*.

It is our respectful submission that the Policy, in its current form, requires further industry consultation and lacks much of the nuance and consideration that is required for an effective policy in an area as complex as gambling and electronic gaming.

There are also some material defects in the intended effect of the Policy (particularly with regard to implementation into the Planning Scheme).

In providing these submissions, CCV has also reviewed and given consideration to the supporting documentation, being:

- Council's *Electronic Gaming Policy* as approved on 23 May 2017 (**the Current Policy**);
- The Greater Geelong Planning Scheme (**the Scheme**);
- *Greater Geelong Gaming Policy Framework*, Coomes Consulting (October 2007) (**the Framework Report**);
- City of Greater Geelong *Fair Play Strategy* (August 2017) (**Fair Play Strategy**); and
- City of Greater Geelong *Community Plan 2021-2025* (**Community Plan**).

We also note that in the course of our ordinary activities (as spelt out below) CCV have been involved in the drafting and implementation of many similar policies. This experience also informs our submission.

The focus of these submissions will be directed at the Policy, and will include reference to supporting documentation and material where appropriate. However, it is recognised that the proposed adoption of the Policy is the primary focus of this consultation.

In short, while CCV and its member Clubs are supportive of Council adopting a harm-mitigation policy, and to provide an update of the Current Policy, it is submitted that the Policy ought be revised further to more appropriately reflect the framework within which gaming exists.

About CCV

CCV is an industry association representing the needs of Victorian community clubs. Our members vary from small volunteer-based sporting clubs through to very large clubs with multi-million dollar turnovers. That said, members have one thing in common - they are not-for-profit entities designed to provide facilities, sport and entertainment for their members and communities.

CCV provides important services and assistance to its member Clubs, including advice and guidance on operations, licensing and regulation, as well as advocates on behalf of its members.

Our submissions in this matter are made in our capacity as an advocate of both members within the City of Greater Geelong, and the club industry in general.

CCV currently has 1,393 member clubs of which 163 clubs operate gaming machines at their venues. KPMG, in their 2015 National Club Census, estimated that Victorian clubs employ approximately 27,900 people in Victoria alone make an estimated \$1 billion overall contribution to the Victorian community.

In a recent media release the then Community Clubs Victoria President, Leon Weigard said:

“Victoria’s community clubs are immensely proud of their role as vital hubs within local communities. These clubs are not-for-profit enterprises and operate gaming machines to support their reason for being – be it sporting, charitable, social or community based. Gaming is always secondary to what a community club offers its members and the wider community in which it operates.”

“EGMs are legal and licensed to venues by the Victorian Government. Around 35 per cent of our revenue is returned to State and Local Government in the forms of taxes and rates, which is then directed to schools, hospitals and other vital infrastructure. We then cover our wages and operating expenses, including local suppliers who serve our Clubs. Anything that is left is returned to the community.”

Clubs within Greater Geelong

These submissions are further made in conjunction with the following CCV member clubs within the City of Geelong:

1. Lara Sporting Club;
2. Polish Community Association (White Eagle House);
3. Buckley’s;
4. Portarlington Golf Club;

5. Clifton Springs Golf Club;
6. North Geelong Football & Netball Club;
7. Bell Park Sport & Recreation Club;
8. Shell Club;
9. Inverleigh Football & Netball Club;
10. Geelong RSL Sub-Branch;
11. St George Workers Club;
12. Ocean Grove Bowls Club; and
13. Leopold Sportsmans Club.

We hope Council will acknowledge and reflect on the vital role that these clubs play in the community life of the City of Greater Geelong across the provision of a diverse range of sporting and cultural facilities and services, and will have due regard to their submissions as pillars of the local community.

Gaming within Greater Geelong

There are 25 operational gaming venues within the City of Greater Geelong with a total of 1,354 EGMs in operation¹. The City of Geelong is subject to a Regional Cap of 1,421 EGMs at any one time. This limit was reviewed most recently by the Minister on 20 September 2017.

The City of Greater Geelong has a local planning policy in place at clause 22.57 (**the Planning Policy**) of the Geelong Planning Scheme (**the Scheme**).

The Planning Policy was incorporated as part of Amendment C168 in October 2010. The Amendment was vetted by a Panel and was adopted subject to amendments.

The policy basis for clause 22.57 recognises that:

'Research has concluded that there are links between social disadvantage, problem gambling and proximity to gaming venues. Although gaming machines may be accessible to the community as a form of entertainment, they should not be convenient so that a pre-determined decision is required to gamble.'

'Furthermore the location of gaming machines should account for the socio-economic characteristics of the municipality. A number of areas within Greater Geelong are particularly disadvantaged, and can therefore least afford the potential harmful effects of gaming.'

The Planning Policy was underpinned by the *Greater Geelong Gaming Policy Framework*, prepared by Coomes Consulting in October 2007 (**the Framework Report**) – which is incorporated into the Planning Policy as a reference document.

The Planning Policy contains further objectives and criteria to positively guide the location of gaming machines, including matters such as:

- Discouraging gaming venues in disadvantaged areas, or postcodes with high EGM density.
- Minimising convenience gaming and incidences of problem gambling.
- Ensuring that patrons have a choice of non-gaming entertainment and recreation within the venue or the surrounding area.

¹ Including premises in the Borough of Queenscliff

- Protecting amenity of surrounding uses.

The Planning Policy states that gaming venues *should* be located where:

- The use will be compatible with surrounding land uses.
- There is suitable distance from community service hubs and services for vulnerable persons.
- Where choices of non-gaming entertainment facilities are available.
- The venue is a large scale sports or recreation Club.

The Planning Policy further contains a robust and detailed set of application requirements and decision guidelines.

Comments on Policy

While the Policy is defined as a ‘Gambling Policy’, based on the legislation referred to therein and the listed purposes of the Policy it is clear that the true application of the Policy is, quite specifically, for electronic gaming machines.

CCV has worked with many local Councils in relation to development of gaming policies and measures that can be introduced in their member clubs that support the shared objectives of Council and member Clubs in harm minimisation for problem gamblers.

That said, CCV and its member clubs have also been involved recently in a number of reviews of Council policies, and it is also appropriate to acknowledge and applaud some strengths in the Policy, and Council’s approach in implementation of the Policy thus far. Those include:

- A. Council has adopted a unique and considerate remote consultation forum, including specific forums targeted at sporting clubs and gaming operators. While it is CCV’s position that industry consultation can indeed inform the *initial* development of the Policy (not just the reactive development), this was a very welcome initiative and one that is appreciated by businesses.
- B. The Policy contains a well-drafted set of principles that underpin the Policy, which acknowledge gambling as a legal activity and acknowledge *problem* gambling as the appropriate public health issue.
- C. The Policy is predominantly well-balanced – in that it is not an ‘anti-gaming’ policy, and uses positive language such as *supporting* alternative non-gambling activities and income (rather than decrying gambling activities and income). Clearly, for sporting and social clubs that are not gaming-centric organisations, the support and encouragement of non-gambling activities and recreation is a pursuit we support.
- D. The Policy acknowledges safe and responsible gambling practices as a measure of harm minimisation.
- E. CCV strongly supports the inclusion of contents within the Policy that may relate to education of the community of the potential harms and risks of problem gambling, the provision of responsible gambling environments, and the provision of non-gambling entertainment options.
- F. The Policy places a focus on Council support for the purposes of gambling prevention, harm minimisation and alternative recreation – and supports clubs to divest themselves from EGM

income *without any adverse consequences*. This aspect of the Policy has been well crafted, since it supports alternative recreation and income sources without trying to strongarm clubs out of receiving gambling sponsorship.

One recommendation would be only to ensure that the priority of organisations that ‘*support alternative recreation activities to gambling*’ should be slightly revised. The current language of the Policy suggests that *non* gambling facilities are to be supported – whereas the language should more appropriately state that facilities that provide alternative recreation (whether or not they *also* have gambling facilities) are to be supported.

The Policy is otherwise discriminatory to facilities which may have ancillary gaming facilities.

That said, following a thorough review of the Policy we seek to raise the following concerns for CCV and its members:

1. Lack of a framework/background report

In our experience, the most successful and well-prepared policies (both stand alone policies and planning policies) are informed by a consultant firm that undertakes a report to Council that assists in forming the Policy.

The preparation of a background report is now considered common practice to bolster a proposed policy – indeed, Council commissioned the Framework Report in 2007 as part of the implementation of the Planning Policy, and the Current Policy contains an annexure with a summary of legislation and statistics which comprises the ‘*Background and strategic context*’ for that policy.

This background report then can be a reference document to assist in interpretation of the Policy, but most importantly the background report addresses matters at a local level such as:

- (a) The current socio-economic circumstances of the LGA and prevailing trends, including relevant approvals and decisions;
- (b) The leading authorities on the decision-making criteria and weighting of benefits applied by the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) and the Victorian Civil and Administrative Tribunal (**VCAT**);
- (c) The latest research regarding gambling-related harm, including an analysis of co-morbidities to harm;
- (d) Summaries and analysis of gaming utilisation and expenditure in the LGA; and
- (e) Following an assessment of the above, recommendations regarding harm minimisation practices for inclusion in a proposed policy.

The Policy, unfortunately, suffers as a result of not being informed by a background report or any strategic context.

It is strongly recommended that background and strategic considerations be incorporated into the Policy to form part of an evidence base for the considerations that will ultimately be contained in the Policy. Such considerations should also be more current than the Framework Plan, which is some 14 years old now.

2. Unclear Purpose

The lack of a background report is most apparent since the Policy is not as clear as it ought to be about its purposes and intentions.

The Policy both provides a 'high level' implementation strategy, which includes some broad statements regarding partnered research, but also purports to provide for an assessment policy for new applications for EGMs *both* at the VCGLR and planning level.

It is these latter aspirations in particular which suffer from a lack of clarity in the Policy, and further suffer from a lack of supporting material. Put simply, in reading this Policy a prospective applicant cannot properly understand whether an application is or is not supported by the Policy; which is a fundamental flaw.

Council's Current Policy, by comparison:

- (a) Contains a statement and criteria regarding the consideration of the merits of any application for EGMs, including principles for suitable/unsuitable venues and local areas;
- (b) Appropriately references the Planning Scheme as containing the applicable policy for planning decisions; and
- (c) Contains a background and strategic context attachment.

The result is that the current Policy is largely aspirational and fails to serve its primary initiative set out in the 'Scope' section, which is to *'provide guidance for responding to planning permit applications... and gaming licence applications...'*

Further, in the 'Monitoring and Reporting' section the Policy states that *'Applications for Electronic Gaming Machines (planning permit and VCGLR licence) will be advised by this policy and assessed against the social impact assessment guidelines outlined in the Council Procedure for Assessing Electronic Gaming Machines. This policy will be updated as per the normal council requirements.'*

This is highly irregular for a number of reasons:

- I. The Policy does not contain guidelines for an assessment of applications, and defers to an external document (which has not been produced), and therefore offers no guidance or transparency on whether an application is consistent with the Policy;
- II. The Policy has uniform application at the planning and VCGLR level – when these are different legislative provisions with different decision-making guidelines and criteria. A single set of assessment criteria is not appropriate as it does not recognise the distinction.
- III. The reference to policy being updated is vague and unhelpful.

The 'Council Leadership' provision also contains a reference to assessment of EGM applications against the Framework Plan. Not only is the Framework Plan not a policy, but it is a Framework Plan for the planning jurisdiction (not the *Gambling Regulation Act 2003*), and is so out of date it pre-dates the creation of the VCGLR in 2011, and pre-dates many importance decisions of the VCGLR and VCAT.

It is strongly recommended that the Policy be updated to contain an appropriate set of criteria and strategies to guide the assessment of applications for EGMs.

The inconsistency with respect to planning is discussed further below.

3. Overlap with planning

It is accepted that the Policy, to the extent that it guides the discretion of Council's decision-making powers, is relevant to *both* applications made under the Scheme and applications made under the *Gambling Regulation Act 2003* (**the Act**).

However, the Policy is flawed in that it has the capacity to supplant decision-making criteria specifically to planning permit applications².

This is problematic, most importantly for Council, because it is ineffective and will reduce the weight given to the Policy at the planning level.

VCAT has consistently regarded any Council policy that is not incorporated in the planning scheme to be given little weight in consideration of the subject planning application.³ The reason for this is that planning scheme amendments involve a rigorous consultation and approval process – greater than the consultation process Council is currently undertaking – including on occasion an independent Panel to make recommendations.

Council should therefore ensure that any reference to application criteria for planning permit applications is confined to acknowledging the relevant clauses of the planning scheme as the proper guidelines for those decisions.

While not expressly discussed in this Policy, should Council be minded to pursue an update to the Planning Policy then the CCV and its individual member clubs would be very willing to participate in any proactive and preliminary discussions with Council to comment on any proposed policy to be incorporated into the planning scheme – particularly given the Planning Policy is quite dated.

4. Statements of Opposition

There are several extracts of Council's leadership provisions that may be construed as an expression of opposition to gambling as a legitimate recreation – and therefore are not appropriate.

These include in particular:

(a) Advocating for a 'reduction' of the current number of EGMs in Geelong.

The number of machines in the area is a matter for State Government (a point acknowledged by the Policy) and a starting position of seeking wholesale reduction creates little room for nuanced analysis. Further, the Policy is not informed by relevant analysis or a background report that supports this position.

While not expressly stated in the Policy, a policy that advocates for a 'reduction' can also be viewed as being a general expression of opposition towards any new venues or top-ups at existing venues.

The VCGLR has previously been extremely critical in relation to policies that seek to reduce the number of gaming machines in a particular LGA. With respect, that is not the legislative framework within which the VCGLR or VCAT is making its decisions. The Act is first and foremost a facilitative piece of legislation that aims to direct how gambling should be provided and enjoyed throughout Victoria.

The Policy should remove reference to 'reducing' EGM numbers – but the term 'managing' is appropriate to remain, since it acknowledges that there can be positive transfers and relocations, and is less prescriptive of a term.

(b) Not holding Council or city meetings, events, activities, programs or outings in venues with EGMs.

With respect, this is an unnecessary and discriminatory aspect of the Policy.

² Refer in particular the 'Scope' and 'Monitoring and Reporting' provisions.

³ *Bright Newbay Pty Ltd v Bayside CC[2010] VCAT 1347*

The stated purpose for the ‘Council Leadership’ principles is to ‘*support a harm minimisation framework*’. However, if it is Council’s view that holding *any* form of event or outing at a venue that has EGMs is contrary to that framework then it is throwing the proverbial baby out with the bathwater.

The Policy itself acknowledges that EGMs are a legal recreational behaviour, and the Policy is well-balanced enough in its language to appreciate that venue design, non-gambling activities, and responsible service of gambling practices are all matters that can contribute to harm minimisation.

This clearly makes room for the acknowledgement that there are well-run venues in Geelong with diverse offerings and a responsible gambling position – and the Policy flies in the face of that position by refusing to hold any Council or City activities at *any* such venue. For many, if not all clubs, gaming is just one of many components of their offering to the local community.

Council will always be able to exercise at its discretion where to host any such events, and it can do so as it sees fit. This aspect of the policy is actively discriminatory, and unnecessarily so.

This component of the Policy should be revised or deleted entirely.

5. Assessment criteria to be more specific

As discussed above in paragraph 2, the assessment criteria are not well set out in this Policy.

The Policy defers to external documents for assessment criteria, including documents within the planning sphere with a different statutory test.

For instance, one of the only areas of the Policy that talks to assessment criteria is in the Principles section, which states ‘*the impact of electronic gaming machines should not be unevenly distributed through communities or populations*’. What is absent is then a criteria to be applied in making an assessment – for instance, stating that the Policy supports relocations of gaming machines where they are removed from more disadvantaged areas, or where they are moved to facilities with a more diverse recreation offering, would be a way of drafting guidelines that support the principle.

A further consideration of a revised Policy would be required to then consider whether each criterion is appropriate in the circumstances – while always acknowledging that primary test under the Act remains the ‘no net detriment’ test.

6. Community Expectations

Council has made reference to undertaking ongoing community attitude surveys and ‘expectations’.

CCV does not intend to discuss the point at length – since the Policy does not seem to be influenced largely by this – but we would only suggest to Council that any appropriate surveys and consultations must be carefully crafted such that they are not perceived as biased, they encompass a broad survey sample, and include a consideration of all benefits associated with EGM facilities (including all ancillary funded recreations and sponsorships).

It has long been accepted that community attitudes to *specific applications* are relevant when regulators are making decisions regarding new or expanded gaming facilities.⁴ There is no

⁴ *Sharay Investments [2014] VCGLR 19; RPH at Roxburgh Park Hotel [2014] VCGLR 42*

dispute from CCV that community attitude has an important place in making of decisions, when properly conducted, however it is not an *overriding* factor.

For the Policy to be more effective, it should detail how community consultation on specific projects is to be conducted, how Council will ensure an unbiased sample, and how Council will treat those findings in the context of an application.

7. Monitoring and Review

A monitoring and review provision should discuss how Council *will* assess the effectiveness of the Policy, and the circumstances that may warrant a further review of the Policy. The Policy only states it will be '*updated as per the normal council requirements*', which is unclear.

This section ought to be revised.

8. Consideration of Benefits

The legislative intention that underpins the Policy is the protection and promotion of the health and wellbeing of the community.

However, the Policy does not acknowledge the countervailing benefits that result from the provision of electronic gaming machines, and the use of expenses to fund, promote and support sports and activity within the local government area – being social and economic benefits which similarly are supported by the objectives of the *Community Plan*.

While we have acknowledged above that the language of the Policy has avoided being overly 'negative' in framing the use of EGMs, it is still missing the discussion of the benefits – which is an essential consideration under both of the planning and VCGLR frameworks.

The creation of sporting and recreational opportunities other than gambling can be a significant factor in mitigating problem gambling harm – and therefore essential to the harm minimisation objectives of the Policy.

By their very nature, the clubs within your municipality providing a range of social and entertainment opportunities other than gambling (and which more often than not are subsidised by gambling activity) is an overwhelming benefit that the Council ought not want to put in jeopardy for the benefit of its constituents.

In representing a balanced and considerate position the Policy must acknowledge the benefits that are provided by clubs that offer gaming machines, otherwise Council is not properly equipped with the required information to make decisions with the true benefit of the community at heart.

Some examples of the donations, facilities and activities that are offered by the CCV member clubs in Geelong are summarised at **Annexure A**.

9. Council Land Policy

The Policy actively discriminates against venues if they happen to be located on Council owned land by prohibiting any advertising or promotion of gambling on Council owned land/facilities. While not expressly stated in the Policy, it is able to be inferred that if gambling is prohibited of being *advertised* then it is also the intention to prohibit any such *conduct* on Council land.

Not only is a prohibition contrary to any permissions that may have been granted under any existing lease or licence of facilities, but the Policy is unclear about what expectations these operators may have for these facilities going forward. They could only assume, based on the Policy, that any venues with any form of gambling offering will be refused further tenure.

Singling out these venues in such a way, where the facilities provided are for the benefit of the broader community, is unnecessary and inappropriate. It is demonstrative of an 'anti' gaming sentiment, rather than a policy that seeks to effectively and responsibly manage gaming facilities – including those located on Council land.

Further, it is not appropriate for Council in its role as landlord to make a moral judgement in relation to its view of the lawfully permitted use of the land.

It is not the case that, if these facilities were to cease to exist, the patrons who currently utilise these venues for the purposes of gaming would simply melt away. They would game elsewhere in the municipality with, perhaps, reduced benefits being delivered back to the community as a result of that transferred expenditure.

The only definitive result of this aspect of the Policy is therefore the reduction of club funds being applied for the benefit of the community, and the loss of sporting and cultural facilities which in turn benefit the community.

For that reason it is recommended this aspect of the Policy be removed.

10. Problem Gambling

The Policy does not *consistently* acknowledge that it is problem gambling behaviour that ought to be regulated and monitored from a public health perspective, not gambling per se.

For example, the Health and Wellbeing section talks to the '*harmful costs of gambling*' which made be interpreted as a conclusion that Council considers 'gambling', not 'problem gambling' represents a harm – rather gambling having *some* negative and *some* positive outcomes.

This is appropriately remedied by ensuring consistent references are made in the Policy to harm being associated with *problem* gambling.

There are other parts of the Policy where this distinction is correctly made, so we do not consider this amendment controversial.

11. Venue Particulars

There is a significant body of research in relation to the provision of a range of entertainment facilities, strong RSG practices, avoiding gaming machines in retail areas and limiting hours of operation that collectively reduce harm related to problem gambling. These are all legitimate matters that should be included in any policy.

Undoubtedly, there are some types of venues and locations that are not appropriate for either the introduction of gaming machines or the intensification of gaming machines – but this Policy, unfortunately, fails to acknowledge the distinctions and factors between appropriate and inappropriate venues. The only reference in the Policy is that Council will prioritise support to venues that adopt '*harm minimisation*' strategies, without providing any particular guidance on what Council considers to *be* effective strategies.

In reading the Policy, it is entirely unclear what venue characteristics would make Council more or less likely to support one venue or application in preference to another. With no guidance, there is no transparency and can result in a lack of consistency. This is particularly surprising; making such distinctions and factors in an assessment of venue characteristics is often the core purpose of a gaming policy.

For instance, the Policy does not even acknowledge that preferred venues and designs might comprise those with non-gaming leisure and recreation facilities as well as gaming facilities. This seems to be entirely logical, but this kind of nuance is entirely absent from the Policy.

CONCLUSION

CCV works closely with its member clubs in relation to the responsible service of gambling and provides a significant amount of resources in relation to same. To make a judgement that club venues do not care about the wellbeing of its patrons is to fundamentally misunderstand the nature of the club industry in Victoria.

CCV and its members are and will always be supportive of any measures that reduce gambling related harm. The Policy as is currently prepared has some very positive content, but in other areas is missing appropriate content, and in some areas needs some help to get back on the right track. A more balanced approach to the Policy is required with more clear objectives, criteria, and goals – including goals that will actually be given weight in any hearing. CCV will support Council on its journey towards revision of its existing policies, in conjunction with communication with our member clubs in the Geelong LGA.

Clubs exist for their communities – to serve their communities, to reinvest in communities and to make our communities healthier, more active and more socially enjoyable places. If our member clubs formed the view that the provision of gambling was contrary to these primary objectives, gaming would not be provided. It is our member clubs who are at the coal face and witness first hand the overwhelming enjoyment that the majority of patrons derive from utilisation of gaming machines.

CCV looks forward to any further engagement with Council in relation to this process. We would encourage more dialogue with both CCV and our member clubs in relation to these very important issues.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Lloyd', written over a horizontal line.

Andrew Lloyd
CHIEF EXECUTIVE

Annexure A – Summary of CCV Clubs and Contributions

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
Lara Sporting Club	1600 members with 800 junior sports players. All live locally.	Gaming, functions, bistro, sporting facilities, football, netball, cricket and baseball sub-clubs, TAB, lounge bar	\$460,111 according to 2020/21 Community Benefit Statement	Groups that the Club supports includes the following: <ul style="list-style-type: none"> - Lions Club - Probus - Sporting clubs including football, netball, cricket and baseball - Primary schools - Kennel Clubs - Wednesday Cards - Lara Care Group - Lara Networking Group 	The Club currently employs 20 staff , including 6 full time and part time staff and 14 casuals. 17 of these staff members live in the LGA.	The Club is involved in fundraising activities including: <ul style="list-style-type: none"> - annual Pink Stumps fundraisers for Glen McGrath Foundation - annual fundraisers for MND Foundation - annual Mental Health Night for the Lara Chamber of Commerce <p>The Club has also been involved in fundraisers for Lara Lions and Lara Probus.</p>	The Club is planning a \$400,000 renovation of its kitchen and bistro to enhance the quantity and quality of the facilities offered at the Club, to allow the Club to raise further funds for community facilities. The Club's General Manager is a graduate of the Leaders for Geelong Program. The Club was a Finalist for President and Employee of the Year in 2019/20 (CCV).
White Eagle House	2,029 members. All members are local to the LGA.	Main hall, conference room, sports bar, bistro, gaming, soccer facilities	The Club makes an annual contribution of \$40,000 to Breakwater Eagles SC. Prior to COVID-19, the Club also made one-off contributions including \$7,000 to the National Pool Tournament, \$4,000 to the Geelong Darts Association, \$10,000 in contributions to Senior Citizens groups and \$10,000 to entertainment	Groups that the Club supports include the following: <ul style="list-style-type: none"> - Breakwater Eagles Soccer Club - National Pool Tournament - Geelong Darts Association - Senior Citizens Groups - Entertainment 	The Club currently employees 19 staff , including 2 full-time staff, 10 casual staff, 6 part-time staff and 1 permanent maintenance person. These staff members	The Club donates use of its function room space to any approved fundraising event that is requested. The Club was also involved in fundraisers for the Victorian Bushfire Relief during	The Club has played an important role in the Geelong community since it was established in 1953. The Clubs initial objectives included promoting Polish culture and traditions within the Geelong Polish community.

¹ Including through use of facilities at reduced or waived cost

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
			organisations such as Geelong Jazz Club in reduced rent or leases. These contributions may recommence depending on the needs of these organisations following COVID-19.	groups including Geelong Jazz Club, Geelong Country Music Club and Geelong Society for Operatic and Dramatic Arts	are all local to the LGA. The Club also contracts caterers who provide their own staff, and a consultant team of four people.	the 2019/20 bushfires. The Club provides subsidised meals for its patrons who are predominately retirees.	
Buckleys	10,000 members , the majority of which are in the LGA	Gaming, Wagering, Bar, Bistro, Functions, Ice-Creamery, Play space	<p>The Club's contributions to football clubs include the following:</p> <ul style="list-style-type: none"> - 2019/20: \$940,000, including \$15,000 per club in April 2020 to support clubs during COVID-19 - 2020/21: \$450,000 <p>The Club makes annual contributions of:</p> <ul style="list-style-type: none"> - \$75,000 in league sponsorship to football clubs - \$3,000 to Read the Play, which addresses mental health in football. <p>Other examples of the Club's community contributions include the following one-off donations:</p>	The Club supports more than 38 sporting groups , including various football and netball clubs.	<p>The Club employs 55 staff, with 14 being full time, 1 part time and 40 casual.</p> <p>50 staff members are local to the LGA.</p>	The Club has participated in events such as Parma for a Farmer (Rural Aid) in 2018 and Let it Pour (Rotary Club) in 2019.	<p>The Club has received 53 awards. Most recently, in 2019/20 Michael Tonks received an award for Club Manager of the Year and the Club received the award for Best Club Refurbishment.</p> <p>In 2018 the Club received an award for Best Regional Club with Gaming, as well as for Best Hospitality Team, Finalist – Best Bistro and Finalist – Best Family Club.</p>

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
			<ul style="list-style-type: none"> - \$10,000 to the Bushfire Appeal in 2020 - \$10,000 to AFL Barwon to assist in their G21 planning in 2019 - A contribution towards the Bell Park Dragons FIDA football team presentation night in 2019 - \$2,000 to Cottage by the Sea in 2020 				
Portarlington Golf Club	3,241 members , all of which are within the LGA.	18 Hole Golf Course, Driving Range & associated practise facilities, Golf Shop with retail and coaching facilities, Golf Cart storage facilities for members, Clubhouse with Restaurant, Function Centre, Board Room, Bar/Lounge, TAB & Gaming	<p>In the past 12 months the Club has made the following contributions:</p> <ul style="list-style-type: none"> - \$21,000 to sporting and recreational groups in LGA - \$30,000 in subsidies for community and sporting groups when using facilities - \$580,000 in upkeep of sporting facilities (golf course) - \$1.5m in capital expenditure of the golf club facilities 	<p>The Club supports 25 groups including the following:</p> <ul style="list-style-type: none"> - Bay View Probus - Bellarine Film Festival - 9 sporting clubs including basketball, cricket, football and tennis - Lions Club - The Portarlington Neighbourhood House - Portarlington Girl Guides - Portarlington Primary School 	<p>The Club currently employs 52 staff, including 28 permanent and 24 casual staff.</p> <p>The Club has 32 volunteers.</p> <p>All are local to the LGA.</p>	<p>The Club's fundraising activities include the following annual events:</p> <ul style="list-style-type: none"> - Lions Club charity day - Red Cross charity day - Barwon Health Foundation charity day, which commenced in 2021 and is intended to be annual - RULE Prostate Cancer charity day, annually - Portarlington Football Club 	<p>The Club has received the following awards:</p> <ul style="list-style-type: none"> - Winner of the PGA Regional Pro Am of the Year award, 2013-2016 - Finalist Pro Am, 2017 - Community Clubs Victoria Best Club, 2014 - Community Clubs Victoria Best Club Refurbishment, 2015 - The Club has been ranked number 62 of Australia's Top 100 Golf Courses

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
						charity day The Club was also involved with fundraising for Feed Me Bellarine in 2021.	
Leopold Sportmans Club	1,520 members	Bistro, sports bar, gaming, Tab, alfresco dining, lawn bowls, squash courts, golf section	The Club contributes a minimum of \$70,000 per annum in cash sponsorships, uniforms, school bursary fund, donate use of facilities, club vouchers and other forms of support.	The Club supports of a number of local groups including local sporting clubs, such as football, cricket, tennis, soccer and angling clubs, preschools, schools, churches and charity organisations and charity fundraisers.	The Club has 42 staff , including 15 full time and 27 casual staff	The Club is involved in the Royal Children's Hospital Good Friday Appeal annually. Prior to the COVID-19 pandemic the Club was involved in one off fundraising events including MND Fight Night and Parma for a Farmer. The Club regularly donates its function room for use by fundraisers and donates raffle prizes for many fundraising events.	The Club was a Finalist for the CCV Award for Family Bistro & Best Regional Club in 2019. The Club has committed to renovations to add a large entertainment area to be utilised by members and locals for functions and events.
Inverleigh Football Netball Club	150+ members	Football and netball facilities Canteen and meals during training and games day, plus a bar		The provides its facilities at a waived or reduced cost for use by Auskick, Netta and a local fitness group.	The Club has 20 volunteers .		The Club has recently been renovated to increase the size of the Club and its facilities.
Shell Club	3419 members, with	Bistro, sports bar, pool room, 2 alfresco areas	In the 2019/20 financial year the Club made donations of \$178,359 , made up of cash	Groups the Club supports include:	The Club currently has 29 employees with	The Club is involved in fundraising projects for the Rory Warriors,	The Club is expanding its facilities with a purpose built function

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
	approximately 99% being in the LGA	including a self-service BBQ Area, function space, lounge and gaming area	sponsorships and charitable donations, as well as discounting for members, affiliates and age group demographics. This amount also includes in kind contributions to sponsored clubs and organisations.	<ul style="list-style-type: none"> - Geelong Rams Rugby - North Shore Football and Netball Club - East Belmont Baseball Club - City of Geelong Bowls - Lara Bowling Club - Corio Cricket Club - Rotary Club - Lions Club 	<p>5 full time positions and 23 full time equivalent positions.</p> <p>The Club also has 8 volunteers, with 7 board members and a maintenance/gardener volunteer.</p>	which supports research into brain cancer. The Club cancelled a major fundraising event that was intended to support this charity in 2021 due to the COVID-19 pandemic, but is aiming to return that event to its activities in the first quarter of 2022.	centre for up to 400 patrons. This project has been delayed due to COVID-19. The resulting building and newly expanded car park at the Club, as well as its newly landscaped gardens, will allow the Club to contribute to a number of different community initiatives, the details of which are being finalised. Projects may include a community garden, farmers market, fundraisers and other community events.
Bell Park Sport and Recreation Club	2000 members , all within the LGA.	Bistro, members bar, gaming machines, two sporting ovals, cricket training facilities, netball facilities, community space	The Club's Community Benefit Statement reflects contributions of \$339,000 in the 2020/21 financial year.	<p>Groups the Club supports include the following:</p> <ul style="list-style-type: none"> - Bell Park Football Club - Bell Park All Abilities Football Team - Bell Park Cricket Club - Bell Park Cricket Club All Abilities Team - Bell Park Netball Club - Bell Park Juniors Football and Cricket - Geelong Falcons - Hamlyn Views 	<p>The Club has 12 employees, with 10 casual staff and 2 full time equivalent positions.</p> <p>The Club also has 100+ volunteers.</p>	<p>The Club runs a fundraising program called Bell Park Cares, which is a unique welfare program incorporated into the Club.</p> <p>This program has already begun and is continuing to be developed.</p> <p>The program provides care and support to Bell Park families confronted by physical or emotional hardship, bereavement, or mental or physical</p>	The Club is involved with the Hamlyn Park Recreation Reserve Master Plan, which will guide the development of the Hamlyn Park Recreation Reserve.

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
				<ul style="list-style-type: none"> - School Herne Hill Primary School - Western Heights Secondary College 		health concerns. The program also provides extra work around the Club to assist with the Club's workload, and seeks to maximise revenue streams available to support expansion of the sporting and welfare programs and facilities at the Club.	
North Geelong Football Netball Club	312 members	Sports facilities, bar and canteen			The Club has a committee of volunteers.	The Club hosts a Ladies Day which supports breast cancer charities and Read the Play.	The Club recently redeveloped its pavilion. The Club recently installed an electronic scoreboard and new sports lights are currently being installed on the main ground. The Club plans to apply for grant funding to upgrade its kitchen facilities. The Club would also like to obtain funding for a second netball court to allow the Club to grow.
Clifton Springs Golf Club	1,285 members , of which all by 35 are from the LGA	Golf course and proshop, bar, bistro, gaming, functions/weddings, meeting facilities used by groups such as Probus, CWA, Lions Club, Rotary	<p>Between 2018 and 2021 the Club provided a total of \$1,424,430 in golf subsidies.</p> <p>The Club provides \$10,000 in community contributions annually as required by the VCGLR.</p> <p>The Club has provided the following further contributions over recent years:</p>	<p>Groups the Club supports include the following:</p> <ul style="list-style-type: none"> - St. Leonards Cricket Club - Bellarine Table Tennis Club - Clifton Springs Tennis Club - Clifton Springs Community Men's Shed - Wallington Cricket Club 	The Club employs 39 staff , with 16 full time and 23 casual staff.		<p>The Club's planned future projects include: constructing two decks to improve the bar and bistro facilities and increase employment and refurbishing the kitchen.</p> <p>This planned redevelopment has construction costs of \$1.5million and the Club intends to engage local</p>

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
			<ul style="list-style-type: none"> - Over a three year period the Club raised \$188,875.45 for Maddie Riewoldt's Vision - \$2,000 to Barwon Health in 2018 - \$1,652 to Endometriosis Australia in 2019 - \$800 to the Bushfire Appeal in 2020 	<ul style="list-style-type: none"> - Clifton Springs Bowls Club 			contractors.
Geelong RSL Sub-Branch Inc	6,000 members with 5,500 being local to the LGA	Bistro, gaming, public bar, sporting facilities, bowls, golf, veterans support groups.	<p>The Club's Community Benefit Statements reflect the following community contributions:</p> <ul style="list-style-type: none"> - 2020/21 financial year: \$595,612 - 2019/20 financial year: \$1,171,346 - 2018/19 financial year: \$1,088,752 <p>The Club provides \$30,000 annually to the Schools Assistance Program.</p> <p>The Club also houses the Geelong Surf Coast Regional Veterans Centre in the first floor of the building which conducts Veterans Advocacy and Wellbeing. The space is provided rent-free, with an estimated value of \$38,000.</p>	<p>Groups the Club supports include:</p> <ul style="list-style-type: none"> - Schools Assistance Program - Probus - TPI - Kiwanis 	<p>The Club has 40 staff, with 25 casual staff and the rest being part time and full time.</p> <p>The Club has 50 volunteers.</p>	The Club is involved with fundraising activities for Remembrance Day and ANZAC Day.	The Club is currently undertaking renovations of \$2.5million , with further renovations expected to follow.
St George Worker's	3,500 members	Bistro, gaming, bar, TAB,	The Club has made approximately \$1.9million in	Groups the Club supports include several primary	The Club has 25 staff with 22	The Club has recently been involved with the	The Club's future projects include

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
Club		KENO, function room, pool room, darts.	annual cash contributions, with \$133,500 in the Club's community benefit statement.	schools, sporting clubs including bowls clubs and football and netball clubs, Rotary clubs and Lions clubs, a poets society and Monday night cards nights.	casual and 3 full time staff, all of which are from the LGA.	following fundraising activities: <ul style="list-style-type: none"> • Good Friday Appeal; • Red Nose Day; • Daffodil Day; • Very Special Kids Appeal; • Guide Dogs Victoria; • Parma for a Farma. 	sponsoring a local football junior team.
Ocean Grove Bowling Club	4551 members	Two grass greens, one synthetic green, a bistro, members lounge, TAB/sports bar, gaming room, two function rooms, board room/admin area and a cabin park.	In the 2020/21 financial year, the Club's Community Benefit Statement included \$737,250 in community contributions.	Groups the Club supports include the following: <ul style="list-style-type: none"> - Ocean Grove/Barwon Heads RSL - Ocean Grove Fire Brigade - Collendina Cricket Club - Ocean Grove Football Netball Club - Rotary - View Club - Probus - Bellarine Greens Party - Callisthenics College - Ocean Grove Little Athletics 	The Club employs 48 staff , with 15 full time and 33 casual staff. All staff reside within the LGA.	The Club has recently been involved in fundraising activities for the Royal Children's Hospital Good Friday Appeal and the Bushfire Appeal.	The Club is contemplating redeveloping the site to include undercover greens.
Australian Croatian Association	300 members	Bistro, functions, gaming, and	The Club has recently provided \$60,314 in community contributions, including for educational purposes, the	Groups the Club supports include the following: <ul style="list-style-type: none"> - North Geelong 	The Club employs 23 staff , with 7 full time, 2 part time		The Club is finalising plans for a full venue renovation, to allow the Club to support more

Club	Members	Facilities	Contributions	Local groups the Club supports ¹	Staff and Volunteers	Other Activities	Other Information
		public bar	provision of services and assistance for the aged and young people, and subsidies for the provision of goods and services.	<ul style="list-style-type: none"> - Football Club - North Geelong Secondary School - Croatian Pensioners - Rotary Club - Umpire/Referee 	<p>and 13 casual. 19 staff reside in the LGA.</p> <p>The Club has 9-10 volunteers including board members.</p>		<p>functions.</p> <p>The Club is also considering developing a facility to supply meals to the greater community of Geelong.</p>

7th December 2021

By Email:

Social Equity Officer
City of Greater Geelong
30 Gheringhap Street
GEELONG VIC 3220

Dear [REDACTED]

Draft Gambling Harm Minimisation Council Policy 2021

[REDACTED] is making a submission to Council in respect of the draft Gambling Harm Minimization Council Policy 2021 (the Policy).

Notwithstanding the submission being presented by Community Clubs Victoria with [REDACTED] being an interested party in that submission, we also wish to submit for the best interests of the [REDACTED].

Of most interest to our Club is the Support any community or sporting club, group or organization to divest themselves of EGMs or end financial dependence on gambling sponsorship or revenue. This would be achieved through an agreed transition business plan.

We also wish to reiterate that the [REDACTED] is in full support of some form of gambling harm minimisation policy.

We are a community sports-based club with over 750 playing members, which includes junior football, junior netball, junior cricket, as well as all abilities football and all abilities cricket as well as over 2000 local community members.

Our club is not a financial powerhouse within the community because of having EGMs. To the contrary, we have struggled to make ends meet for years. We are extremely lucky to have a great band of hard working and loyal volunteers that have continued to support the club both financially and with many tireless hours to ensure the club has survived throughout these difficult times.

[REDACTED]

Our buildings and surrounds at [REDACTED] are well overdue for renovation and or upgrade and for a GFL Club would be considered in 'most need of work' within the LGA. Demographically we don't have a new captive audience with players through the development of a new housing estate or state of the art facilities. We continue to work hard to ensure the club increases participation numbers each year.

We are already disadvantaged by paying extra rent on our social rooms as well being responsible for the cost of maintenance on those rooms. Other clubs, without EGMs are using their rooms, commercially, and are not asked to meet those extra costs. Income derived through the EGMs is put back into the community via support of schools and other worthwhile causes.

We would like to explore the options proposed by council to support clubs to help reduce their reliance on gambling income streams. We would also welcome the opportunity to discuss the support that council would offer to assist clubs to divest themselves of their EGMs.

We trust that COGG will evaluate all the information from interested parties and arrive at a decision that is fair to all. Bearing in mind that our club in particular, will do everything possible to ensure we support a version of the council's gambling harm minimisation policy.

Yours sincerely

[REDACTED]



Bethany Community Support Inc. (Bethany) welcomes the opportunity to provide a response to City of Greater Geelong's *Gambling Harm Minimisation Council Policy Draft*.

Bethany have been providing *Gamblers Help* services to the Geelong region for more than 26 years. The Victorian Responsible Gambling Foundation (VRGF) provides funding for the Gambler's Help suite of services, aimed at improving the health and wellbeing of the Victorian community through the local delivery of prevention, early intervention and support to reduce harm from gambling.

Through our experience working within the sector alongside VRGF, we support the purpose and scope of the draft Policy and wish to work closely with Council to achieve change and to reform the systems and structures that cause gambling-related harm to the Geelong community. Below, we have included information about Bethany's Gambler's Help program and statistics related to Electronic Gaming Machines (EGM), which have created an increased demand for Bethany's services over the last 18 months as a direct impact of the pandemic.

Bethany's Gambler's Help program is a free and confidential problem gambling service that offers specialised counselling services to people experiencing harm from gambling, including partners, family members, employers, friends and community members. The program aims to deliver activities that minimise personal, health, social and financial harms that arise from gambling, and to improve an individual's and the community's capacity to reduce gambling related harm.

This is achieved through the delivery of coordinated and integrated services that are targeted towards people who are at risk of, or are experiencing, gambling-related harm, and through establishing strategic relationships and partnerships that are aligned to achieving service aims and goals.



The specific goals of Bethany Gambler's Help services are to:

- assist individuals, families and affected others to manage gambling harms
- assist individuals to reduce or stabilise gambling behaviours
- support individuals to maintain positive behaviour change post-treatment
- raise awareness in the broader health and community sector in order that these professionals can identify and respond to gambling harm.
- build the capacity of gaming venues and staff to identify and respond to gambling harms
- increase awareness and help-seeking across the range of Gambler's Help services, particularly with those vulnerable populations identified within the community
- improve community knowledge of the potential harms and risks associated with gambling
- take action at the local level to reinforce and/or support the implementation of campaigns and programs delivered on a state-wide basis.

The VRGF, alongside with Bethany, works within a public health framework to focus on the community as a whole or at a population level rather than that of individuals. This approach recognises that no single intervention, when employed in isolation, will deliver an optimal public health outcome. Our **Community Engagement and Venue Support Programs** fall within the domains of prevention and intervention, which focus on preventing harm before it occurs and reducing gambling harm in the early stages.

- **Community Education** – is delivered via local secondary schools and community service organisations. The school education program is specifically designed for years 7-9 and 10-12 covering topics of gambling, gaming and sports betting. Our work with community service organisations aims to build capacity and provide professional development on the impacts of gambling harm. Addressing factors such as the social stigma attached to help seeking has led to the development of several referral tools and the design of Geelong specific information to assist stakeholders in supporting individuals and the broader community to increase knowledge and development harm reduction strategies.
- **Venue Support** – Bethany works with hotels and clubs in the Geelong region to provide mandatory RSG training for all licensed venues/clubs under the *VGLR Code of Conduct*



requirements for licensing and compliance. In addition to this mandatory training, Bethany also provides additional awareness and education training to Venue staff and management, and the wider club community including club committee members, coaches, players and volunteers.

The alarming statistics related to Electronic Gaming Machines (EGM) - It is widely known that Gambling harm from EGM's is a burden on our community. The impact of restrictions related to the COVID19 pandemic has contributed to an enormous (47%) increase in sports betting and wagering, which substantially impacts young people between 18 – 35 years. (Jenkins R, Khokhar T, Tajin R, Jatkar U. 2020)

Public health researchers have identified that the harms associated with EGMs are significantly linked to social inequality. For example, individuals who are unemployed, with lower incomes and living in rental accommodation are more likely to experience harm from gambling. (Marko S, Thomas S.L, Pitt H, Daube M 2020). It is vital we comprehensively address all forms of gambling in our community, particularly the easily accessible gambling products such as sports betting and the normalisation of sports betting, which is prominent within our local sporting clubs. Research conducted by the VRGF in 2018-2019, found that 70% of Victorian Adults participate in some form on gambling with almost 20% of Victorian Adults reporting they have gambled online. (Victorian Auditor General Office 2020)

Moving forward there is an opportunity for Bethany and City of Greater Geelong to work together to achieve greater awareness and pathways to support services like Bethany's to licensed venues/sporting clubs to help address problem gambling.

We believe that one of the greatest barriers for change with the City of Greater Geelong's draft Policy, is the reliance on the funds supplied by Clubs to maintain and enhance sporting club facilities and suggest that an opportunity exists to address this by working collaboratively together. By strengthening awareness, we can build a strong base for change and opportunity for greater innovation and alternatives to the reliance of funds derived from gambling.



Bethany Community Support has been responding to the changing needs of Greater Geelong's community for more than 153 years and would welcome working together with City of Greater Geelong to achieve greater outcomes and support for our community.

Ends.

References

Jenkins R, Khokhar T, Tajin R, Jatkar U. (October 2020) *Gambling in Australia during COVID-19*. Australian institute of Family Studies

Marko S, Thomas S.L, Pitt H, Daube M (22 July 2020) *The development and implementation of electronic gambling machine policy: a qualitative study of local government policy makers*
<https://doi.org/10.1111/1753-6405.13005>

Victorian Auditor General Office (March 2020) *Reducing the harm caused by gambling*. Victorian Government Printer

SUBMISSION 4:

Bethany Community Support Inc. (Bethany) welcomes the opportunity to provide a response to the City of Greater Geelong's *Gambling Harm Minimisation Council Policy Draft*.

Bethany have been providing *Gamblers Help* services across the Barwon and Great South Coast region for more than 26 years. The Victorian Responsible Gambling Foundation (VRGF) provides funding for Bethany's suite of Gambler's Help services which aim to improve the health and wellbeing of the Victorian community through the local delivery of prevention, early intervention and support to reduce harm from gambling.

Through our extensive experience working within the sector alongside VRGF, we support the purpose and scope of the draft Policy and wish to work closely with Council to achieve change and to reform the systems and structures that cause gambling-related harm to the Geelong community. Below, we have included information about Bethany's Gambler's Help program and statistics related to Electronic Gaming Machines (EGM), which have created an increased demand for Bethany's services over the last 18 months as a direct impact of the pandemic.

Bethany's Gambler's Help program is a free and confidential service that offers specialised counselling services for people experiencing harm from gambling, including partners, family members, employers, friends and community members. The program aims to deliver activities that minimise personal, health, social and financial harms that arise from gambling, and to improve an individual's and the community's capacity to reduce gambling related harm.

This is achieved through the delivery of coordinated and integrated services that are targeted towards people who are at risk of, or are experiencing, gambling-related harm, and through establishing strategic relationships and partnerships that are aligned to achieving service aims and goals.

The specific goals of Bethany Gambler's Help services are to:

- assist individuals, families and affected others to manage gambling related harms
- assist individuals to reduce or stabilise gambling behaviours
- support individuals to maintain positive behaviour change post-treatment
- raise awareness in the broader health and community sector in order that these professionals can identify and respond to gambling harm.

- build the capacity of gaming venues and staff to identify and respond to gambling harms
- increase awareness and help-seeking across the range of Gambler's Help services, particularly with those vulnerable populations identified within the community
- improve community knowledge of the potential harms and risks associated with gambling
- take action at the local level to reinforce and/or support the implementation of campaigns and programs delivered on a state-wide basis.

The VRGF, alongside with Bethany, works within a public health framework to focus on the community as a whole or at a population level rather than that of individuals. This approach recognises that no single intervention, when employed in isolation, will deliver an optimal public health outcome. Our **Community Engagement and Venue Support Programs** fall within the domains of prevention and intervention, which focus on preventing harm before it occurs and reducing gambling related harm in the early stages.

- **Community Education** – is delivered via local secondary schools and community service organisations. The school education program is specifically designed for years 7-9 and 10-12 covering topics of gambling, gaming and sports betting. Our work with community service organisations aims to build capacity and provide professional development on the impacts of gambling harm. Addressing factors such as the social stigma attached to help seeking has led to the development of several referral tools and the design of Geelong specific information to assist stakeholders in supporting individuals and the broader community to increase knowledge and development harm reduction strategies.
- **Venue Support** – Bethany works with hotels and clubs in the Geelong region to provide mandatory RSG training for all licensed venues/clubs under the *VGLR Code of Conduct* requirements for licensing and compliance. In addition to this mandatory training, Bethany also provides additional awareness and education training to Venue staff and management, and the wider club community including club committee members, coaches, players and volunteers.

The alarming statistics related to Electronic Gaming Machines (EGM) - It is widely known that Gambling harm from EGM's is a burden on our community. The impact of restrictions related to the COVID19 pandemic has contributed to an enormous (47%) increase in sports betting and wagering, which substantially impacts young people between 18 – 35 years. (Jenkins R, Khokhar T, Tajin R, Jatkar U. 2020)

Public health researchers have identified that the harms associated with EGMs are significantly linked to social inequality. For example, individuals who are unemployed, with lower incomes and living in rental accommodation are more likely to experience harm from gambling. (Marko S, Thomas S.L, Pitt H, Daube M 2020). It is vital we comprehensively address all forms of gambling in our community, particularly the easily accessible gambling products such as sports betting and the normalisation of sports betting, which is prominent within our local sporting clubs. Research conducted by the VRGF in 2018-2019, found that 70% of Victorian Adults participate in some form of gambling with almost 20% of Victorian Adults reporting they have gambled online. (Victorian Auditor General Office 2020)

Moving forward there is an opportunity for Bethany and City of Greater Geelong to work together to achieve greater awareness and pathways to support services like Bethany's to licensed venues/sporting clubs to help address problem gambling. We believe that one of the greatest barriers for change with the City of Greater Geelong's draft Policy, is the reliance on the funds supplied by Clubs to maintain and enhance sporting club facilities and suggest that an opportunity exists to address this by working collaboratively together. By strengthening awareness we can build a strong base for change and opportunity for greater innovation and alternatives to the reliance of funds derived from gambling.

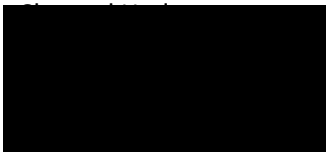
Bethany Community Support has been responding to the changing needs of the Greater Geelong's community for more than 153 years and would welcome working together with City of Greater Geelong to achieve greater outcomes and support for our community.

References

Jenkins R, Khokhar T, Tajin R, Jatkar U. (October 2020) *Gambling in Australia during COVID-19*. Australian Institute of Family Studies

Marko S, Thomas S.L, Pitt H, Daube M (22 July 2020) *The development and implementation of electronic gambling machine policy: a qualitative study of local government policy makers* <https://doi.org/10.1111/1753-6405.13005>

Victorian Auditor General Office (March 2020) *Reducing the harm caused by gambling*. Victorian Government Printer



Submission regarding City of Greater Geelong Draft Gambling Harm Minimisation Council Policy (the Draft Policy)

I welcome the opportunity to comment on the Draft Policy and commend the City of Greater Geelong (CoGG) for broadening its scope beyond electronic gaming to all forms of gambling. In general the Draft Policy is a step in the right direction for our community, however I believe there are areas in which the CoGG could demonstrate more active leadership.

As a resident of Geelong, a mother of a child who is growing and developing in this community and as a public health practitioner I have high expectations of my Council to act as a responsive and accessible government who has its communities' best interests as its core value. When regarding public health matters I expect strategic direction, decision-making and all Council led activities to be evidence-based and to proactively work to prevent and reduce harms to public health.

While it is difficult to measure the full impact gambling has on our community, the CoGG have estimated that in 2019/20 more than \$88 million dollars were lost through the use of electronic gaming machines alone. While this is significant it does not quantify the devastating health and social impacts of gambling beyond financial loss, such as psychological and emotional distress, impaired social relationships, and reduced capacity to participate within society (for example in work or study). Therefore it is critical to recognise that the harms from gambling extend beyond an individual themselves impacting families, friends, workplaces and the broader community. Furthermore it should also be noted that as shocking as the estimated financial losses from electronic gaming are, these are a gross underrepresentation of total financial losses within the Greater Geelong community as these do not take into account losses through other forms of gambling such as sports betting and lotteries.

The Draft Policy clearly outlines the actions in which CoGG will take leadership in reducing gambling harms as listed in the final priority area. While there are many important points raised under the other priority areas (such as planning and regulation etc) these read more like principles. It may be more user friendly to frame the other priority areas to be consistent with the council leadership section so that it is clear how CoGG will work under each priority area.

The *Gambling Regulation Act 2003* allows Greater Geelong and Queenscliffe a maximum of 1,421 gaming machine entitlements. While the Draft Policy notes Council will show leadership by advocating to the state government for a review of the current electronic gaming machine cap in Geelong, it is critical that the CoGG ensures this does not unintentionally result in an increase in the number of electronic gaming machines permitted. It is critical that CoGG partners with research institutions to develop robust evidence regarding the impacts of gambling within our community to support advocacy efforts and build the business case for action. Furthermore I strongly suggest that the CoGG demonstrate their commitment to gambling harm minimisation by partnering with and financially supporting the Alliance for Gambling Reform, an organisation joined by many other Victorian councils leading the fight to end gambling harm. I note the CoGG has not yet partnered with the Alliance for Gambling Reform which could provide additional advocacy support and

important learnings from other councils already supporting their community prioritising gambling harm minimisation.

I strongly support Council to not hold any Council-related activities in venues with electronic gaming machines, and suggest leadership is extended further by broadening this to any venue which supports any form of gambling. I recognise that many community groups and sporting clubs may currently rely on sponsorship from gambling venues or directly from gambling revenue. While the Draft Policy acknowledges supporting these organisations to divest from gambling related funding, I recommend a transparent transition plan with a clear timeline which Council expects this to have occurred is developed and published. This will give community and implicated organisations clarity on when business models need to be changed by in order to access community grants or council support in the future.

I strongly support Council to prioritise community grants to organisations which demonstrate a commitment to public health including prevention of harms from gambling. However I do recommend that this point is reviewed and strengthened in the future to prevent access of community grants to organisations who continue to associate with gambling after the timeframe set out in the abovementioned transition plan. It should be recognised that if there is a true desire to minimise harms from gambling there must be a strong focus on preventing entry into gambling. It is unacceptable that community groups and sporting clubs are a potential entry point for gambling, or even worse an early exposure to gambling for children. It is well documented that early exposure to gambling is a risk factor to later addiction therefore prevention of exposure is critical. As a mother I have grave concerns about any community group or sporting club which chooses to expose children to gambling in any form. I would expect that the council which acts to serve its community also acts to support community organisations which are not associated with harms such as gambling.

I strongly support no gambling promotion or advertising on and in Council facilities. Furthermore, I encourage CoGG to advocate to state government to demonstrate leadership by introducing statewide policies to prevent the advertisement of gambling promotion on state-owned infrastructure such as bus stops and railway stations. Council are in a unique position to represent their community and advocate to state government when state based regulations are not fit for purpose or demonstrate harms to the community.

I look forward to the CoGG's ongoing leadership in preventing and minimising gambling harms.

Kind regards,

A solid black rectangular box used to redact the signature of the sender.

As a resident of Newtown in Geelong, I viewed the online replay of a recent COGG council meeting where the COGG DRAFT Gambling Harm Minimisation Policy was presented. It appeared the majority of council attendees had little knowledge of the complexities associated with the comorbidities associated with gambling harm.

It would be unfeasible to address gambling harm void of a planned approach to disseminate evidenced based education and resources. If it has not already been provided, gambling harm education would support the councilor's voting on this new policy prior to a decision being made to ensure a comprehensive knowledge base of the impacts gambling has within our community.

To increase awareness of gambling harm across the region it will be strategically beneficial as a long term harm minimization strategy to implement an upstream approach by delivering evidenced based Gambling Harm Professional Development across the following areas:

1. Geelong Councilors (Who will ultimately be voting on the implementation of this policy)
2. COGG staff (Commencing with ALL COGG staff to raise awareness of the GH Policy)
3. Sporting club committees and members (Awareness and emphasis needed to also include the upward trend of sports betting)
4. The wider Geelong community (Gambling Harm is an ALL of community problem)

There is also merit from engaging the consumer voice. To learn from those impacted by EGM's (pokies) where in the Barwon region approximately \$320,000 is spent each day. The voice of the younger demographic should also be considered; those highly engaged with the use of online sports betting apps and wagering, this could be facilitated via the COGG Youth Council. Sports betting is relentlessly encouraged via gambling advertising particularly within a club setting "Bet with Mates". Since COVID and for the first time ever, online sports betting and wagering exceeded EGM expenditure in 2020.

There is much complexity surrounding gambling harm and comorbidities. Harm from gambling presents a burden to wellbeing of our community and is not exclusive to the individual, it affects family members, including children, friends, and within the business sector, as well as the wider community.

There is strong links between gambling and mental health, alcohol and drugs as well as an established link between gambling harm and family violence. New research conducted in 2020 by the Australian National

research Organisation for Women's Safety interviewed 72 women across Australia with a lived experience of family violence and gambling harm. Of the 72 participants, 24 with a lived experience of intimate partner violence related to their own gambling and 48 lived experience of IPV was related to male partners gambling. The key points from this research must be considered to support the argument for greater awareness of gambling harm particularly given the 2015 Royal Commission into Family Violence.

Key points from this research:

- Gambling by both men and women intensified intimate Partner Violence against women
- Male gamblers were reported to neglect their parental, financial, relationships and social responsibilities, ignoring the welfare of their partner and children
- Anger and frustration associated with gambling were often converted to violence
- Many women blamed themselves; not recognizing the problem earlier, feeling powerless to change the situation, feelings of guilt, depleting their confidence and self esteem
- All the women interviewed stated that their partner's gambling stress was a major contributor of his violence
- Gender inequality manifested through gendered drivers of violence against women provides the fundamental context; without this foundation, this violence would not occur
- Within this context, problem gambling exacerbates IPV against women, intensifying abusive behaviors due to the severe stresses that problem gambling places on individuals and relationships, and through organisational, systems and societal factors that reinforce problem gambling and gambling-related IPV
- In the abusive relationships in this study, gender inequality was evident through rigid gender roles, men's control of decision-making, limits placed on women's independence, and condoning of violence towards women, reflecting broader social norms of gender inequality.

Recommendations made by this research

- Continuous professional development can raise awareness of the interaction of problem gambling, IPV and comorbidities such as mental health and substance use disorders
- Raising awareness and recognition by service providers of problem gambling as a contributor to IPV

- Continuous professional development can raise awareness of the links between gambling and IPV, the gendered drivers of violence against women and the reinforcing role of gambling.
- Training also needs to focus on the importance of early intervention, the ability to recognise indicators of gambling-related violence and how to respond appropriately.

It is clear gambling harm is a complex issue and a robust gambling harm minimization policy is required.

The measures included in the DRAFT policy address opportunity for capacity building. It necessary to emphasize this aspect and highlight its importance if we are to embrace this opportunity for a shift in community thinking and alter the 'norms' and acceptance that exists around gambling. I would also say 'You don't know what you don't know, until you know it' and gambling harm education is the pathway to provide the required awareness and opportunity for capacity building across the region.

I agree with the leadership and approach of council in seeking to build greater capacity and seeking alternative, positive recreation activities for community members and to explore alternative revenue streams for sporting clubs. It makes sense that local sporting clubs be incentivized to apply for COGG funding grants based on:

- Participation in gambling harm education
- A three tier approach to include Committee member, players and volunteers
 1. Once education and training is complete the club receives an endorsement certificate to be displayed at participating clubs
 2. The Certificate can be incorporated as evidence when applications for funding are submitted to COGG for consideration
 3. A business plan to explore avenues to generate new and innovative income streams non reliant on gambling to provide a sustainable future and strong culture for resilience

This Gambling Harm Minimisation Policy is an opportunity for change, with a capacity building approach, it is vital the complexities of the issues surrounding gambling harm are thoughtfully considered.

I look forward to following the process which follows from here.

[REDACTED]

**Response to the City of Greater Geelong's
Draft Gambling Harm Minimisation Council Policy**

Documented human fascination with gambling goes back to the to the mid-1600s with the notorious French gambler, Chevalier de Mere, who, after continuing to lose a fortune on his gambling habits, approached famous mathematicians, Blaise Pascal and Pierre de Fermat, to mathematically work out a system which, at least, would minimise de Mere's losses or, better still, increase his chances of winning. The only positive that came out of this exercise was the birth of Probability Theory in Mathematics.

Things have not changed much since then. Although a great majority of people know that there is no such system that will ensure you of a win in the game of chance, nevertheless, a very small percentage of punters still live in that void hope that they can "beat the system", often either using dubious mathematical approaches or simply waving "lucky charms" in front of the display of gaming machine or even calling on God's intervention by holding holy pictures of the saints while making the next bet!

There is no doubt that ALL forms of gambling can impact adversely on the punter and on the general community, in the same way as irresponsible consumption of alcohol, *hoon* driving behaviours or even fast-food outlets have on obesity. But for some reason, politicians and other "concerned" members of our community don't run around advocating the banning or limiting the sale of alcohol, stopping young people from driving cars or limiting the number of MacDonalds outlets! So, why do our politicians think that a simple solution, like limiting the number of gaming machines will eliminate our gambling problems? At the same, time turning a blind eye of the effects all the other forms of gambling have on our communities.

During the last stages of the COVID-19 lockdowns this year, clubs and hotels were permitted to open their venues but only with a cap of 10 patrons at the venue at the one time. Our Club, the White Eagle House, decided to open its venue, under that restriction, while other clubs, all larger than ours, and hotels decided that it was not financially viable for them to open up. During this four-week period, we had patrons who we had never seen before coming from all over the Geelong area to play our EGMs. This clearly demonstrates that decreasing availability of gambling opportunities in a particular area does not stop the regular gamblers of finding a place to satisfy their gambling needs, no matter how far they have to travel. I recall in the 1970s, Victorians organised "Pokies Trips" to RSL and Leagues clubs in NSW.

I have no argument with the fact that gambling, in general, impacts adversely on a small percentage of punters. The "*Draft Gambling Harm Minimisation Council Policy*" does begin encouragingly, by giving reader a broad definition of what constitutes gambling, making us believe that this Policy will apply to ALL gambling forms. Sadly, that was the last time any other form of gambling is mentioned in any substantive way in the document. It focuses only on electronic gaming.

Furthermore, whenever gaming machines are discussed, clubs are very often singled out as the big culprits. Yet, hotels, with EGMs, collect the bigger share of the EGM dollar and, unlike clubs, the hotel revenues do not go back directly into the community.

In 2021, the Australian Government's Institute of Family Studies released its "*Gambling Participation and at-risk Behaviour in Problem Gambling among Victorian Adults*" Report. The Report did not pull any punches as to the detrimental effects that gambling has on the gambler and the social cost it has on the community. In doing so, and to its credit, the Report did not single out one form of gambling over another.

It was interesting to see the statistics related to all types of gambling in Victoria in this Report. The set of statistics below from the Report should be enough to cause the Council for the City of Greater Geelong to re-focus its Draft Policy and include ALL forms of gambling not just EGMs. Only then it can work with gaming venues, the GRC, Tattersall agencies and community groups to come up with real strategies which that will

effectively minimise the gambling problem in Geelong, rather than just focusing on simplistic solutions. Why punish 93% of people who enjoy an occasional flutter on the pokies, because the other 7% of punters cannot control their addiction? Effective strategies should include research into why people can't or won't control their gambling habits so that they can be given the assistance and appropriate counselling early.

In my opinion, the only way we will have any chance of minimising the gambling problem is through education programs, not just through schools but also through sporting clubs and community organisations. Furthermore, as was done with cigarette advertising, pressure should be put on the Federal Government to ban ALL gambling promotions in all media outlets. This is where Council's efforts and resources should be focused, not fighting Clubs who work hard to provide support to their communities, especially its younger members.

A further quote from the Report I referred to above:

"Lotteries were the most common activity to spend money on (76% of people who gambled or 27% of all Victorian adults), followed by electronic gambling machines (EGMs) 'pokies' (21% of people who gambled or 8% of all Victorian adults) and race betting (17% of people who gambled or 6% of all Victorian adults)".

The Report also found that:

"Victorians who gambled spent an average of \$1,268 annually on gambling activities in 2015; EGMs accounted for the highest annual expenditure (\$1,288), followed by bingo (\$1,252) and race betting (\$1,211)".

Granted, the figures are based on 2015, and I am sure the averages have increased since then but, proportionally, there is not much difference between the expenditures in the three gambling areas, and yet the focus is always on EGMs!

Another interesting statistic from the Report:

"Around 18% of Victorians who gambled (or 8% of all Victorian adults) were classified as being at risk of, or already experiencing, gambling-related problems".

It would be interesting to see the breakdown of the gambling areas on which these 8% of Victorians spent their gambling dollar.

Another interesting statistic the Report provides relates to Race Betting compared to other form of betting:

Race Bettors' Gambling Problem Severity (Taken from the Australia Government Report)

Gambling problem severity	Regular Gamblers	Regular Race Bettors
No Problems	83.3%	58.6%
Low-level Problems	8.7%	19.4%
Moderate Problems	5.9%	16.8%
Severe Problems ("Problem Gamblers")	2.1%	5.1%
Any Problems	16.7%	41.4%

With the plethora of online betting agencies emerging during the last decade and, with it, an uncontrolled bombardment of advertisement in all sections of the media, at all times of the day, it is not surprising that the gambling problems among race punters is that bad. Gaming venues are not permitted to advertise themselves as a "pokies venue" – and rightly so! But Bingo venues, Racing clubs, lotteries etc can do what the like. Why are they so special? Why doesn't the Council take on the Racing Industry and the online Sport Betting multinational giants in the same way it has taken on gaming venues? Are they simply too big and too powerful to be taken on? Or is it because, as one of the Councillors pointed out at a Council meeting, *"Aren't we (i.e.,*

the Council) somewhat hypocritical in spending over \$30,000 fighting the White Eagle House (WEH) application at the VCGLR to increase the number of EMGs at their venue, when the Council holds some of its Council Meetings at the Geelong Racing Club in Breakwater?”.

It was also pointed out to our members who attended that Council Meeting that the one of the Councillors was also the President of the GRC. There is nothing wrong with that, but no conflict of interest was declared by any Councillor before the vote was taken to formally oppose our Club's Gaming application at the Commission. Remember, both the GRC and the White Eagle House are located in Breakwater - a “disadvantaged” community according to Council!

When the WEH applied to the Victorian Commission for Gambling and Liquor Regulations (VCGLR) to increase the number of EGMs at its venue, the application was rejected. The CoGG argued that the Breakwater area was classified as a “disadvantage area” and that the extra EGMs would have a damaging impact on this socially disadvantaged Breakwater community. Yet the Report, I have been referring to above, seems to contradict this argument:

“Compared to the general Victorian adult population, people who reported regular gambling, were more likely to be: male; aged 50 and older (and less likely to be aged 18–29); be partnered (married/de facto); of English-speaking background; employed full-time or retired (and less likely to be employed part-time, studying full-time, or unemployed and looking for work); draw their main source of income from a pension, allowance or benefits; live outside a major city; and own their house outright or with a mortgage”. (My highlights).

This means that it would be unlikely that socially disadvantaged residents of Breakwater were at risk of being our problem gamblers, as being “disadvantaged” would mean they would either be part-time workers, students or unemployed and, according to the above Statement, that group would therefore “unlikely to be regular gamblers”. It also annoys me greatly that so often it is assumed that if a group is classified as disadvantaged, they are then immediately pigeon-holed as incompetent of managing their finances and making “correct” decisions.

Most of our patrons attending our Club are retirees and most own their homes (based only on anecdotal evidence from informal conversations). They attend our Club for social reasons and take advantage of the affordable meals we offer, because we can subsidise the costs from our gaming operations. Yes, some do have a flutter on the pokies after their meal, but most go home well before closing time. I admit, some patrons do attend the Club specifically to play the machines.

With regard to patrons who attend specifically to play the pokies, all our staff monitor their habits closely using the knowledge they receive from their regular training in both Responsible Service of Gaming and Responsible Service of Alcohol. Each month, the Manager reports on every issue related to responsible gambling which may have occurred during the previous month and the actions that were taken, if any were required.

The WEH has always endeavoured not to make electronic gaming the focus of its existence. There are no signs inside the venue advertising the Pokies. If you attended the Club for the first time, you would not know where the gaming room was. We do encourage and promote the use of our facilities for a wide range of other activities, totally unrelated to EGMs. Soccer, for example, is one of the main groups the Club has been sponsoring for the last four decades. The WEH provides and maintains three soccer pitches, all with lights suitable for evening training, changerooms and small soccer club rooms. At the end of each year, WEH donates up to \$4,000 towards trophies for Soccer Club's Presentation Night. In total, the sponsorship is valued at over \$40,000 per annum.

Because WEH operates 35 EGMs, it can also make its facilities available free of charge to a Polish Senior Citizens Group and a Multicultural Senior Citizens Group on separate days, each week during the whole year. This allows the seniors in our community to socialise and participate in activities organised specifically for them and, at the end of their session enjoy a meal at our Bistro.

The WEH has also welcomed the Geelong Jazz Club and the Country Music Club to use our main function area on a monthly basis at a greatly reduced rate.

The Polish community, whether they are paid members of the Polish Community Association (PCA) or not, also use our facilities to celebrate our Polish National Days, religious festivities and to promote Polish cultural activities.

None of this would be possible had it not been for the income (albeit small compared to other clubs in our LGA) which the Club generates from its 35 gaming machines.

Just over 30 years ago when gaming machines were introduced in Victoria, the PCA deliberated at length before deciding to initially apply for five EGMs. After a period of time, we applied for another 30 machines. We were confident that, as a Club, we would be able to meet all the very strict regulations imposed on us by the VCGLR. In fact, like all the gaming clubs in our LGA, we celebrated our accomplishment knowing that we would now be able to play our part, through the income we expected to generate, to provide facilities from which our local community would benefit.

Although we, and clubs like ours, strictly abide by the rules and regulations set down by successive State Governments, yet, sadly, after operating as a legitimate gaming venue for just over 30 years, our City Council is now making us feel as though we are doing something illegal or immoral because we are a gaming venue. I for one, as I am sure many others in the Geelong community, DO NOT appreciate politicians, at any level of government or, for that matter, any church leaders, to think they can set themselves up to be my “Moral Compass”, and tell me what I can and cannot do with my spare time and with my money. Council should look after what they do best – making Geelong the most liveable city – and not spend ratepayers money fighting clubs which are operating legitimately and responsibly in our community. Council should, however, work together with clubs and other gambling/betting venues to find effective solutions to gambling problems caused by ALL forms of gambling.

Henry Szkuta



Portarlington Golf Club Inc.

130 Hood Road, Portarlington, Victoria 3223
T: (03) 5259 2492 F: (03) 5259 2959
E: info@portarlingtongolf.com.au
W: portarlingtongolf.com.au
ABN: 93 538 383 693

10th December 2021

Att: Courtney Yam
Social Equity Officer
City of Greater Geelong
30 Gheringhap Street
GEELONG VIC 3220

By Email: cyam@geelongcity.vic.gov.au

Dear Ms Yam

RE: Draft Gambling Harm Minimisation Council Policy 2021

Portarlington Golf Club seeks to make submissions to Council in respect of the *Draft Gambling Harm Minimisation Council Policy 2021*.

The Portarlington Golf Club is a not-for-profit community club that operates gaming machines to support our reasons for being – a sporting, social and community hub.

Gaming is always secondary to what we offer our members and the wider community in which we operate, so it is essential that Council acknowledges this and that any future policy reflects the vital community roles clubs play within the City of Greater Geelong.

A snapshot of our club:

- 3241 members who live within the City of Greater Geelong
- 52 staff employed at the club, including 28 full-time staff
- We operate a golf course, driving range and golf shop supported by a clubhouse with restaurant, function centre, bar/lounge and gaming.
- During 2020/2021, the club reinvested more than \$2million back into the community through improved facilities, both at the club and within the wider community.
- We directly support 28 different community and sporting organisations within our local community.
- The club has made a long-term commitment to continued investment into the community through the Portarlington Golf Club Strategic Plan 2021 that includes the following.
 - develop and strengthen women in golf activities & programs
 - grow junior golf participation
 - staff development and training
 - greater engagement to build programs to support those sporting and social groups in the community that need it most

- continue to develop and promote a gender equality framework and be recognised for our leadership and commitment to the principle of equal opportunity within our community.
- build a long-term environmental sustainability plan

More broadly, this is who we are ...

Our Purpose

Where golf and friendship come together

Our Passion

An environment that is inclusive and welcoming to everyone

Quality clubhouse facilities and golf a course in great condition

Well trained hospitality staff providing warm, welcoming service

Quality food and drinks at reasonable prices

Competent management and administration staff driving long-term success

Pro shop staff with strong golfing knowledge serving the needs of our members and guests

Our Values

We will respect our members, employees, and guests

We will act with integrity in all matters

We will demonstrate honesty and fairness in all dealings

We will act in a non-discriminatory and inclusive manner

Comments on the proposed policy

While the draft policy is defined as a Gambling Harm Minimisation Council Policy, its only practical implementation is to specifically target electronic gaming machines.

Further, it only references community and supporting clubs with EGMs and no other forms of gambling or those organisations that operate gambling within their premises, including racing club facilities, hotels with EGMs, bingo centres, TABs and lottery agencies.

The policy is not balanced in the sense that it does not acknowledge the benefits that result from the provision of electronic gaming machines within clubs for the promotion and support of sports and social activities within the local government area.

The policy does not consistently acknowledge that problem gambling should be what is regulated and monitored for public health, not the legal activity of gambling

Conclusion

The Portarlington Golf Club strongly supports the practice of safe and responsible gambling, but is concerned the policy unfairly targets community clubs with EGMs and does little to address the issue of problem gambling within the broader community.

To make judgement that the Portarlington Golf Club does not care about its members' wellbeing is to fundamentally misunderstand our purpose as a community sporting club.

The Portarlington Golf Club exists for our community, to serve our community, to reinvest in our community and to make our community healthier, more active and a socially enjoyable place to visit.

Portarlington Golf Club looks forward to any further engagement with Council in relation to this ongoing process. We take this opportunity to encourage more dialogue with the Portarlington Golf Club and other sporting and community clubs in relation to these very important issues.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'M Phillips', with a long horizontal flourish extending to the right.

Michael Phillips
CEO

A handwritten signature in blue ink, appearing to read 'John Bowman', with a large, looping flourish underneath.

John Bowman
President

CoGG Draft Gambling Harm Minimisation Council Policy – LSC Submission

The Draft Gambling Harm Minimisation Council Policy, while perhaps well-meaning in its intent, in reality further discriminates community clubs and organisations whose sole purpose is to financially, administratively and logistically support our community and charity groups. This policy will adversely affect clubs already burdened with 'low priority' status for grants and funding, it will further strengthen private gambling venues whom are wholly indifferent to community concerns, as well as having zero consideration for EGM's being the most heavily regulated gambling industry in the state. This policy finally needs to adhere to all facts and evidence and not just information provided from anti-gambling organisations with an agenda.

Current CoGG policy already ranks community clubs with gambling facilities low on the priority list for grants and funding. While this draft policy claims to partially correct that by requiring clubs to voluntarily facilitate programs and strategies to educate the negative effects of gambling it will no doubt have the opposite effect. This policy will become an ambiguous statement highly interpretable by council officers responsible for making vitally important decisions on grant priorities. How does a council officer quantify what is considered a 'sufficient enough strategy or program' to increase our priority status? How can clubs be protected from key individuals who find gambling, while completely legal and a form of entertainment for many, 'deplorable' and 'money stealers' for some?

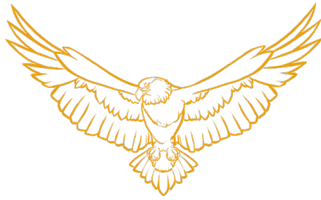
Clubs fill a very important role for so many communities. They are often the centre of community events and charity functions, they fund and support many different sports, they are homes to many different organisations and not-for-profit groups who are welcome and invited to hold their meets free of charge. Clubs are legally required to provide a financial figure to the community in the form of a community benefits statement. Unlike hotels and pubs which are privately owned and from which gambling facilities profits are returned to Clubs profits are 100% returned to the club for distribution in many forms eg; members benefits, facility maintenance and upgrades, community grants, sporting subsidies, charities donations and many more. This draft policy further erodes the role of community clubs, it in essence aims to pressure clubs to reduce and remove gambling facilities. What this policy fails to recognise is that if the clubs no longer have these facilities, then they will be purchased from those profit-oriented hotels and clubs which are not beholden to the community, they are not required to fund local sports and charity groups and they're always on private land meaning the CoGG have zero power to enforce and 'gambling harm minimisation' policies.

The CoGG recognises that in 2019/20 \$89M was spent on EGM's in the Geelong LGA. They have not conceded that only 34% of that expenditure was at clubs. The balance of the 66% was in fact at hotels and pubs, organisations this policy has zero impact on.

EGM's are the most heavily regulated gambling industry in Victoria. The VCGLR, AUSTRAC, ASIC are organisations that maintain strong regulation on clubs with EGM's. AML/CTF, Codes of Conduct, Your Play, club constitutions and by-laws, are all systems in place to ensure clubs maintain strict compliance protocols for gambling. Again, hotels and pubs are not beholden to as many facets of protocol. The University of Sydney's Gambling Treatment Centre – School of Psychology conducted research and determined only 0.7% of adults had a serious problem with gambling. This was later confirmed by the VRGF. In comparison VicHealth found in 2019 that 37% of people between 16 and 29 will drink to get drunk. 46% of those drinking are in a 'risky' chance of being injured from one session of alcoholic intake. If the CoGG is creating a policy that only affects 0.7% of its citizens, shouldn't funds be more concentrated on areas of higher concern?

The Lara Sporting Club is the centre for community engagement in our region. We have 2000 members and growing every year. With 800 kids we host the largest concentration of junior sports between Lara and Geelong CBD. A significant portion of their funding comes from EGM's. If the CoGG continues to drive anti-gambling policies it will see these kids without their sports, the Lara community without a strong home

venue and will see private gambling organisation reap significantly increased gambling returns all being deposited to the pockets of a very small group of owners.



East Geelong Football & Netball Club

eastgeelongfnc@gmail.com
PO Box 714, Geelong, 3220
ABN 33 754 607 006

Draft Gambling Harm Minimisation Policy Submission.

The East Geelong Football and Netball Club have been operating continuously in the East Geelong community since 1879. We see ourselves as an integral part of the fabric of Geelong. The Club is grateful for the support it receives from the Geelong and District Football League and Buckley's.

The GDFL had the foresight many years ago to invest in the Buckley's facility as a means of providing ongoing financial support to all Clubs with the GDFL, but also to AFL Barwon Clubs within the GFL, BFL and CDFL.

We fully support the policy in terms of attempting to reduce the impact of gambling in the community, but also acknowledge that it is a legal form of activity providing entertainment.




Without the ongoing financial support from the GDFL, the ability of our Club to adequately run its programs would be affected. It is guaranteed income that we can budget for that is not related to membership, functions, bar and canteen, sponsorship and the like.

The league/Buckley's in addition to the direct dividend also provide a works fund and the Hartley Cooper Fund.

Works Fund: This money is allocated to the Club each year and can be used for capital works at our facilities. The facility we occupy is a Council owned building and reserve, which we pay rent on and are also responsible for the upkeep and maintenance on. In recent years this works fund has been used to assist with construction of an electronic scoreboard, construction of a Netball storage shed, maintenance of light poles and lights, upgrade of internal lighting to the clubrooms to LED. None of the above works would have been able to occur without the assistance of the Works Fund. That is, COGG facilities are being upgraded with the assistance of the support of the GDFL.

Hartley Cooper Fund: This fund is again contributed to every year by the GDFL and is to be used for the support and development of junior programs as Club level. We have predominantly used this funding for the development of our Auskick and NetSetGO programs for our young members. With the support of the GDFL, we have been able to make both programs free for several years now through a reimbursement to parents. Over a period of approx. 5 years this has allowed us to grow our Auskick participation from 6 kids to over 60, and NetSetGo from 3 girls to over 25. The flow on effect is that we are now able to field teams in all junior divisions of both football and netball. This does not happen without the league support.

Est. 1879

 @eastgeelongfnc
 @EGFNCjuniors
 @egfnc



East Geelong Football & Netball Club

eastgeelongfnc@gmail.com
PO Box 714, Geelong, 3220
ABN 33 754 607 006

We cannot speak for all sporting clubs in the district but can assure you that the support that is received annually from Buckley's and the GDFL is essential to not only the day-to-day operation and survival of the club, but allows us to grow and provide essential community services through the football and netball programs we run.

The primary issue of concern with the Draft Policy is the "Council Leadership" dot point around prioritising Clubs and organisations who undertake initiatives that focus on gambling prevention. If the ability of our Club to receive grants is impacted, this will hinder the development of our programs and the ability to continue to grow. As an example, we have been the recipient of two CoGG grants recently that will allow us to do some project planning to prepare a facility plan to re-develop the clubrooms and prepare documentation to construct a second netball court. These two projects are fundamental to allow the Club to prosper and grow, providing our services to a greater number of community members. If we are impacted on our ability to obtain funding, not only does the community suffer as a result, but the continual development and upgrading of the COGG facilities does not occur.

Clearly the Club would support any initiative from CoGG to support and resource activities as alternatives to gambling. The EGFNC does provide alternatives to gaming by encouraging participation in winter sports and the community engagement that results.


Yours faithfully

Nathan McLaren
Secretary

Sean O'Leary
President

East Geelong Football and Netball Club

Est. 1879

 @eastgeelongfnc
 @EGFNCjuniors
 @egfnc

SUBMISSION 11:

This policy focuses on the reduction of harm for all forms of gambling. It balances the right to entertainment with the need to promote wellbeing. The policy provides guidance for responding to planning permit applications for the use of and installation of Electronic Gaming Machines (EGMs) and gaming licence applications to the Victorian Commission for Gambling and Liquor Regulation (VCGLR).

**Good. I suggest the following statements as well:
Reduce the reliance on gambling for fundraising by community groups
Reduce the promotion of gambling as a leisure pastime**

COUNCIL'S INFLUENCE:

HEALTH & WELLBEING: Promoting and supporting alternative social and recreation pursuits •

Be guided by the Our Community Plan 2021 – 2025 strategic priorities. •

Council, through the Public Health and Wellbeing Act 2008, has a mandated responsibility to care for the community reflected through the integration of the Municipal Public Health and Wellbeing Plan (MPHWP) into the Community Plan. •

Be guided by the City's strategy and policies, including the City of Greater Geelong Fair Play Strategy 2017, and consider funding and supporting services, infrastructure and initiatives that provide alternative social and recreation choices to gambling. •

Support local community-based organisations that generate some of their income from gambling activities, to reduce their reliance on gambling income streams.

Recognise that gambling is harmful for many people, and therefore seek to actively promote safe and responsible gambling practices.

Recognise that the harmful costs from gambling are born by the individual who gambles, their circle, and the community at large. This can in turn impose substantial costs and unintended negative consequences for the community.

Council should be commended for the recognition that harms from gambling are largely borne by the individual, their families and their wider community networks.

It should also be highlighted that some gambling products are more dangerous than others – one of those being Electronic Gaming Machines. They have been shown to have a greater addictive quality via the interaction of the individual and the machine's algorithm; examples being 'losses disguised as wins' and 'high number of 'near misses'.

PARTNERSHIPS & ADVOCACY • Capacity building – developing the capacity of the community and the City of Greater Geelong to understand and respond to the impacts of gambling, including the delivery of socially equitable and responsive infrastructure and services. • Partner with research institutions to develop a strong, robust and defensible evidence base that will enhance the City's capacity to effectively influence the location, management and operation of EGMs within the municipality, whilst also contributing to the broader evidence base. • Partner with local government networks, community organisations and key partners to utilise their expertise in broader advocacy issues, to achieve change and to reform the systems and structures that cause gambling-related harm to the Geelong community.

Given the limited resources and roles open to local government it is important that the City partners with key advocacy bodies, namely the Municipal Association of Victoria, the Victorian Local Governance Association (in particular the Local Government Working Group on Gambling) and the Alliance for Gambling Reform. Each of these bodies has differing strengths. Tackling the issue of gambling harm is complex and multi-faceted and each of these bodies would bring particular knowledge and differing capacities to act on the various issues associated with gambling.

COUNCIL LEADERSHIP As in many matters that affect the social and economic wellbeing of the community, council plays a leadership role to support a harm minimisation framework. Over the next four years Council will: •

In the context of reducing and managing the current number of EGMs in Geelong, advocate to the state government for a review of the current EGM cap in Geelong. •

Invest in community infrastructure, community programs and activities as alternatives to all forms of gambling. •

Resource activities that enhance capacity building including the promotion and support of the many alternate and positive forms of recreation in our community and ensure community awareness raising is provided annually through the annual gambling harm awareness week and relevant community education programs. •

Assess all applications for EGMs against a Social and Economic Impact Assessment (SEIA) guided by the Greater Geelong Gaming Policy Framework and taking into consideration community expectations and/or concerns regarding problem gambling. An associated report and recommendations for response to the VCGLR will be provided to Council and considered at a gazetted Council meeting. •

Not hold Council or City meetings, community events, activities, programs and social outings in venues that have EGMs. •

This is an important leadership position by Council and the broader City organisation. By eliminating a public presence in venues that hold gambling products, will reduce the likelihood that people with no interest in gambling do not fall into a position of ‘accidental engagement’ with EGMs. This position also reduces the normalisation of such gambling products in the community. It is extremely important that EGMs are not seen as being part and parcel of public life; that in fact it takes a concerted effort and decision to enter into such venues.

Install and maintain internet filtering to prevent access to gambling sites on all City public wi-fi. •

Important initiative given the pernicious growth of internet based gambling

Not permit gambling promotion or advertising on / in City-owned facilities. This pertains to all forms of gambling. •

Important leadership position by Council to reduce the normalisation of gambling. Whilst being an aspiration, I suggest that Council considers a long term goal of not having any form of gambling product on/in Council owned facilities.

Whilst talking of aspirations, Council Staff should be given the option to have a day off other than that the government gazetted public holidays which promote gambling, namely Melbourne Cup or Geelong Cup day. Whilst horse racing has been shown to be less harmful than gambling via EGMs it would be consistent to give staff the option of celebrating another day that does not involve gambling.

Support and encourage the clubs with EGMs to allocate their gambling-related community contributions to relevant services targeted towards minimising gambling-related harm.

Incorporate gambling questions in relevant community surveys and during community consultation in order to better understand gambling harm within Greater Geelong and further support policy and program development. •

Support any community or sporting club, group or organisation to divest themselves of EGMs or end financial dependence on gambling sponsorship or revenue. This would be achieved through an agreed transition business plan. •

This is good initiative. It is unfortunate that gambling has entered into the business model of many sports organisations, be it through promoting gambling via EGMs or receiving sponsorship from betting organisations.

I suggest that the policy goes one step further by changing the opening word from ‘support’ to ‘encourage’. Council could proactively achieve this aim by working with regional bodies such as Leisure Networks.

Ensure the community grants program prioritise organisations, clubs and groups who undertake initiatives with a focus on gambling prevention or harm minimisation, or who support alternative recreational activities to gambling.

This is a good initiative. I suggest that a mechanism is built into the community grants program to give support or give higher priority to organisations that are seeking to transition away from gambling products. This will have of course have to be supported by an appropriate business plan and/or demonstrated actions by the applying organisation/club.

SUBMISSION 12:

Youth Council – Engagement session – Monday 6 December 21

Draft Gambling Harm Minimisation Council Policy

Does the Youth Council support the draft Gambling Harm Minimisation Council Policy?

Youth Council vote: **Unanimous yes**

Question	Response/comments	Notes
How well does the direction of the new policy fit with Youth Council's priorities?	<ul style="list-style-type: none">• On a scale of five responses from 'not at all' to 'very well', 100% of respondents selected "quite well". (n7)	
What is your message back to Council about the changes?	<ul style="list-style-type: none">• It's unlikely to get rid of gambling all together. The industry creates too much profit. So maybe introducing tighter and more specific restrictions.• I feel like this is a really good opportunity. gambling is a real problem and it doesn't just effect people engaged in it, but others around them as well. In my opinion, Council should look into this.• Gambling is a problem and the policy at least makes it give to the community.• It doesn't relate to Youth in the policy.• I personally think further consideration is needed based of the large issue.• It is always going to be a problem but it is important to advocate & create awareness for the community including our youth.• Good opportunity to make positive change in the community.	
Do you think there is anything the draft policy has missed?	<ul style="list-style-type: none">• The appeal to young and old.• Doesn't explicitly state anything that relates to youth, this impacts youth too.• Impacts on the youth of Geelong.	
What would help with the communication and progress of the draft policy?	<ul style="list-style-type: none">• Social media• Community events• Seek further opinions maybe?• Advertisements around the central Geelong area.• Include people from different backgrounds for consultation.	
On the proposed changes to the draft policy :	<ul style="list-style-type: none">• Refer to what I said before about understanding how much power council actually has.	
1 support local community based organisations...	<ul style="list-style-type: none">• Love the word community!!• Should it be 'child' organisations?• Is there data that shows places will?	
2 Invest in alternatives to all forms of gambling	<ul style="list-style-type: none">• Still promotes though.	

3 Not hold council meetings at venues with EGMs	<ul style="list-style-type: none"> • Great idea. Shows that people are willing to prevent gambling. • Really good, shows local community the stance COGG takes. • I think this is good. • Shows the stance towards gambling.
4 Install internet filtering...	<ul style="list-style-type: none"> • I think this is good. • People will still find a way. • Kind of lack of freedom even though it's (gambling) is bad. • Focus more on education rather than squandering people's freedoms.
The following statements have been added to the draft policy: 5 Not permit gambling promotion...	<ul style="list-style-type: none"> • Very good! • Yay! • Good! • Shows a stance. • Yasss.
6 Support and encourage clubs to allocate their gambling contributions to relevant services.	<ul style="list-style-type: none"> • Great for achieving change. • Some forms of gambling are on a state or federal level, so is that too big for our local council to change? • Help clubs that rely on EGM's continue, but benefits the community.
7 Incorporate gambling questions in surveys	<ul style="list-style-type: none"> • Education is important. • Most important! Educate before action.
8 Support groups to divest...	<ul style="list-style-type: none"> • Links to the idea that money gained from gambling is used for gambling prevention. • I agree. • Splitting profit is productive in reducing gambling corruption. • Promotes groups to find funding without gambling.
9 Ensure grants program prioritise...	<ul style="list-style-type: none"> • "Prioritise" Please! Stick with it! • Support this. • Decreasing awareness/ ads for this instead of completely stopping it. • Isn't this a kind of a 'no-choice' thing – pushing into a corner. • More support from gambling clubs rather than trying to get rid of it all together.