

## **INQUIRY INTO IMPACT OF GAMBLING**

**Organisation:** Anglican Church Diocese of Sydney

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# Archbishop of Sydney

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The Director  
Select Committee on the Impact of Gambling  
Parliament House  
Macquarie Street  
Sydney NSW 2000  
Australia

**Inquiry into the Impact of Gambling  
Submission from the  
Anglican Church, Diocese of Sydney**

Thank you for the opportunity to make a submission to this important inquiry.

The Anglican Church in this Diocese continues to be dismayed at the on-going proliferation and access to gambling in NSW, and the concomitant effects on family life and community well-being. The impact of the internet and televised sports wagering also means that children have unprecedented exposure to gambling, as it becomes a 'normalised' form of entertainment.

The evidence has shown that Australia has a very significant gambling problem. The H2 Gambling Capital report revealed that Australia leads the world in gambling, with Australian adults gambling more money per resident adult in 2010 than any other nation. Given this, we write to congratulate the State Government on work already done to treat problem gambling and to encourage the State Government to take all necessary further steps to treat and prevent the negative impacts of gambling on our community.

We provide the following brief comments with particular reference to the specified Terms of Reference below.

***1. The regulation of the number and location of electronic and high intensity gaming machines***

In 2010, the Productivity Commission provided its report on Gambling to the Australian Government. This report identified that gambling expenditure in Australia is dominated by electronic gaming machines (EGMs) with almost \$12 billion spent on EGMs in Australia during 2008-09. Forty per cent of these losses came from problem gamblers. Reducing the number and location of EGMs and limiting new licences issued for their operation is the first step in tackling the impacts of gambling in NSW.

***2. Voluntary pre-commitment technology and operational guidelines***

We would encourage the State Government to consider implementing mandatory pre-commitment technology for EGMs. Mandatory, self-chosen pre-commitment will strike a balance between preserving personal autonomy, providing safe-guards for members of society who are particularly vulnerable and allowing casual gamblers to have certainty about

their gaming limits. Given the prevalence of problem gambling within the Australian population (0.7% of the total population, and with a further 1.7% deemed to be at moderate risk of becoming problem gamblers, as identified by the Productivity Commission's 2010 report), a voluntary pre-commitment scheme is unlikely to produce meaningful results.

We do not have the operation insight or necessary technological expertise to suggest the exact mechanics by which the scheme could be implemented and operated. However, we suggest that the following points might be important elements of the scheme, with much of the necessary infrastructure already available.

- A personalised card for use in any EGM in NSW, with all such machines modified only to accept credits from such cards. These cards would enforce any loss limits within a specified time frame. As with an ATM card, the user would access prepaid credit on the card by means of a PIN pad on the EGM.
- A specified time period during which a user cannot use an EGM if the loss limit has been reached. At the point of issue, the user would specify the maximum loss amount during a defined time cycle, with the minimum time cycle being a 24 hour period.
- A requirement to load the card with money from savings or cheque accounts only.

Mandatory pre-commitment is an appropriately measured response to identified need. Investment by Government, clubs and hotels in the regulatory regime and infrastructure to implement mandatory pre-commitment should be affirmed as a strategic way to deter and manage problem gambling while allowing certainty and freedom for those who choose to gamble.

### ***3. Access to cash and credit in and around gambling venues, and the form and delivery of cash prizes***

We strongly encourage the State Government to restrict entirely the ability of gamers to access credit within any gambling venue. EGMs and other methods of gambling should not accept any form of credit as the payment method. Further, we support the removal of ATMs and other cash machines from gaming venues, except in regional areas where it is the only accessible ATM at various times in the day.

In these regional areas, the number and placement of ATMs within gambling venues should be regulated, with a minimum physical distance stipulated between points where cash can be accessed and the location of EGMs and other gambling venues. Ideally, ATMs should be located in well-lit areas with a minimum of noise and with a clear line of vision to a clock and the outside natural environment, where possible. These measures will encourage gamers to step outside of the artificially constructed environment which has been designed to encourage them to spend more and more money and help them re-connect with the outside world.

### ***4. The regulation of gambling advertising***

In general, we are concerned with any shifts towards anonymous, individual gambling contexts which lack social accountability and which make it more difficult for problem gamblers to separate themselves from situations in which problem gambling behaviours can be exercised. The current expansion of gambling advertising inducing gamblers to bet online via personal computers, tablets and mobile phones is a primary cause of this concern as

they endorse and enable access to gambling opportunities that are not mediated by a social context. We support any move to restrict gambling advertising, and particularly oppose the broadcasting of gaming odds during public sports broadcasts in any form, and any further liberalising of the ability for gambling organisations to encourage online gambling via advertising.

***5. Gambling education including school-based programs, and measures to reduce the exposure of children and young people to gambling activity***

We support the expansion of education programs that aim to reduce the exposure of children and young people to gambling activity. The unwelcome intrusion of on-line gambling advertising during sporting events, televised at times when children will be watching, for example, all day cricket matches and afternoon football matches, requires special attention.

***6. The adequacy and effectiveness of problem gambling help services and programs, including service standards, qualifications and funding of chaplains, counselling and treatment services***

In the past, churches and other community-based organisations encouraged people towards their 'best' behaviour, whilst governments sought to curb the 'worst' behaviour through regulation. Over time, governments have assumed both functions of promoting and encouraging good behaviour and restricting the excesses of society. We want to encourage the Committee to consider how State Government can partner with like-minded community organisations in creative ways to work together to prevent and treat problem gambling. We support the improved funding of chaplains, counselling and treatment services to ensure all people affected by and at risk of problem gambling are able to access these services easily and meaningfully.

Yours sincerely

**The Most Rev. Dr Glenn Davies**  
**Archbishop of Sydney**