



GAMBLING HARM LIVED EXPERIENCE EXPERTS

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## **GHLEE Submission – City of Greater Dandenong Gambling Policy Review**

Gambling Harm Lived Experience Experts (GHLEE) welcomes the opportunity to respond to the City of Greater Dandenong's gambling policy review.

GHLEE is a group of passionate individuals who have experienced the devastating effects of gambling harm. We believe that change is possible, and we are committed to making a difference. Our mission is to raise awareness about the dangers of gambling and to provide support for those who have been affected by it, while advocating for true gambling harm reforms.

GHLEE will firstly respond to the City of Greater Dandenong's online survey and secondly provide feedback to Council's gambling policy document.

### **Survey**

#### **Which statement best describes you?**

GHLEE represents individuals with lived and living experience of gambling harm and works closely with people impacted by gambling-related harm including affected others.

#### **In your view, which types of gambling cause the most harm in Greater Dandenong?**

While all forms of gambling can cause harm, GHLEE believes electronic gaming machines remain one of the most harmful gambling products due to their design, accessibility and ability to facilitate continuous losses. Online gambling and sports betting have also become significant drivers of harm due to their 24-hour accessibility, inducements, aggressive advertising and increasing normalisation, particularly among younger Australians.

#### **Overall, how much harm do you think gambling causes in our community?**

Gambling harm is a significant public health issue that extends far beyond financial loss. It contributes to mental illness, family violence, relationship breakdown, housing instability, social isolation, suicidality and broader community disadvantage. The level of gambling losses experienced within Greater Dandenong demonstrates that gambling harm continues to have a substantial impact on community wellbeing.

#### **What do you think makes gambling harm more likely in our community?**

While multiple factors contribute to gambling harm, easy access to high-risk gambling products remains one of the strongest predictors of harm. The increasing availability of online gambling means people can now gamble anywhere and at any time. GHLEE also notes that gambling advertising, inducements and cost-of-living pressures are significant contributing factors and

should not be overlooked. People spending more money on gambling means less money to support local businesses and services.

### **What kinds of harm have you seen or experienced?**

GHLEE members have also observed significant impacts relating to family violence, impacts on children and young people, housing stress and homelessness, social isolation, criminal justice involvement and suicidality. The harms associated with gambling frequently extend beyond the individual gambling and affect entire families and communities.

### **GHLEE response to City of Dandenong's Gambling Policy**

The current Gambling Policy appropriately acknowledges that gambling harm extends far beyond financial loss and includes poverty, financial hardship, mental distress, family conflict, family violence, relationship breakdown, homelessness, social isolation and diminished participation in community life.

From a lived and living experience perspective, GHLEE believes it is important to recognise that gambling harm is often not experienced solely by the individual gambling. The harm frequently extends to partners, children, parents, extended family members, workplaces and the broader community.

The City of Greater Dandenong has already recognised that local residents have lost billions of dollars through gambling products and that gambling harm disproportionately affects vulnerable communities. We support this recognition and believe it should remain central to the revised policy.

However, gambling harm today is increasingly mobile, digital and interconnected. People no longer gamble only within their immediate neighbourhood. Individuals routinely gamble where they live, work, socialise and travel. Online gambling has further removed geographical boundaries.

For this reason, GHLEE encourages Council to view gambling harm through a broader public health lens rather than solely through a local venue or municipal boundary framework.

### **What Actions Are Most Effective**

GHLEE believes the most effective actions are those that reduce harm before it occurs rather than relying solely on individual responsibility after harm has already developed.

While community education and awareness remain important, evidence increasingly demonstrates that structural consumer protection measures are significantly more effective than information-based approaches alone.

Accordingly, GHLEE encourages the City of Greater Dandenong to strengthen its advocacy for:

- Mandatory loss limits across both electronic gaming machines and online gambling products;
- Mandatory carded play and pre-commitment systems for all electronic gaming machines;
- A comprehensive ban on gambling inducements, incentives, bonus bets and loyalty programs;
- Stronger restrictions on gambling advertising and sponsorship;

- Reduced access to gambling products in areas of socio-economic disadvantage;
- Greater accountability for gambling operators that breach consumer protection obligations;
- Stronger obligations on financial institutions to identify and respond to gambling-related harm
- A national public health approach to gambling harm reduction; and
- Banning elected officials and public servants from receiving hospitality, donations and gifts from gambling companies

GHLEE notes that many of these measures extend beyond the direct powers of local government. However, local government has a critical advocacy role and can influence State and Federal reform through coordinated leadership.

## **Recommended Changes to the Gambling Policy**

GHLEE supports many elements of the current policy and encourages Council to retain its strong position opposing gambling expansion and advocating for reform. It is GHLEE's view that there appears to be some ambiguity in terms of Council's advocacy and evidence of enacting this part of its policy.

GHLEE encourages the City of Greater Dandenong to be explicit in its gambling policy of what reforms it seeks to pursue, who it is pursuing it with and providing updates and evidence of its advocacy.

Council is well positioned to expose not only the gambling harms occurring within its municipality but the policies that seek to meaningfully reduce gambling harm. There are a myriad of platforms and campaigns that Council could utilise to increase its advocacy presence and become a powerful voice in the gambling harm space.

It is GHLEE's contention that the revised policy should explicitly include advocacy for:

### **Implementation of "You Win Some, You Lose More"**

The City of Greater Dandenong should formally advocate to the Federal Government for the implementation of all recommendations contained within the Parliamentary Inquiry report "*You win some, you lose more*".

The report remains the most comprehensive roadmap for gambling reform currently available in Australia and contains recommendations that directly address many of the harms experienced by Greater Dandenong residents.

### **Mandatory Loss Limits**

The policy should explicitly support mandatory and enforceable loss limits for both electronic gaming machines and online gambling products.

Australians currently remain exposed to unlimited gambling losses despite increasing evidence that mandatory limits are one of the most effective harm prevention measures available.

### **Prohibition of Gambling Incentives**

The policy should be expanded to advocate for the prohibition of all gambling inducements and incentives, including bonus bets, deposit matching offers, cash-back promotions, VIP programs and loyalty schemes.

These products are specifically designed to encourage increased gambling participation and expenditure and are fundamentally inconsistent with harm reduction objectives.

### **Lived and Living Experience Leadership**

The policy should explicitly recognise the value of lived and living experience perspectives in gambling policy development, advocacy and reform.

People with lived and living experience of gambling harm possess unique expertise regarding how gambling products operate, how harm develops and what reforms are most likely to reduce harm.

### **Recognition That Gambling Harm Is Not Restricted by Municipal Boundaries**

Whilst understanding the City of Greater Dandenong's first priority is to its own community and rate-payers, the revised policy might acknowledge that gambling harm is not just confined to local government boundaries.

Individuals routinely gamble across multiple municipalities and online. Consequently, lived and living experience evidence from outside Greater Dandenong may still be highly relevant to local gambling policy development and EGM application processes.

### **Banning donations from gambling companies**

GHLEE welcomes statements made by Council under Section 4.4 of its current policy "*Councils relationship with the Gambling Industry*".

Receiving monies from gambling companies is effectively taking money from vulnerable and at risk residents. Any moral and ethical organisation would reject such opportunities.

In its policy Council states that "*Council-supported clubs will be discouraged from accepting funds from the gambling industry*". GHLEE contends that this statement could be strengthened by replacing the word "*discouraged*" with the word "*banned*".

The infiltration of gambling into community clubs and organisations is incredibly disturbing and Council has an opportunity to make a strong stance in this regard by ceasing the likelihood of harm that would emanate from such partnerships.

It is patently clear to GHLEE and Australians with gambling harm lived experience that the relationship and conflicts between elected officials and gambling companies is stifling appropriate gambling consumer protection and duty of care reforms.

We encourage the City of Greater Dandenong to expand its current position by calling upon Victorian and Federal elected representatives and political parties to also place bans on receiving monies, hospitality and gifts from gambling companies.

### **Support Services**

GHLEE notes the importance of harm prevention policies but also understands that when people are harmed, or vulnerable to being harmed, that appropriate support and services are available. We note section 4.3 under the current policy document references "*Community consultation and Education*"; however GHLEE believes this could be expanded further with an explicit section dedicated to "*Support Services*".

GHLEE recognise that effective responses to gambling harm extend well beyond traditional treatment services and require a broad, integrated and person-centred support system. The City of Greater Dandenong is well placed to increase promotion of available gambling harm support services including the likes of Gamblers Help, BetStop and Financial Counselling Australia whilst advocating to the Government for an integrated, well-resourced and coordinated support system guided by lived experience.

GHLEE believes that language matters. The name Gamblers Help is in our view outdated and a potential barrier to persons seeking assistance. Whilst other jurisdictions have renamed their organisations to reflect contemporary language; Victoria is sadly lagging and we seek Council's assistance in calling for change in this regard.

## Conclusion

GHLEE commends the City of Greater Dandenong for maintaining one of the strongest gambling harm policies in local government which is understandable given the gravity of gambling losses in its municipality.

Data shows that annual EGM losses in the City of Greater Dandenong are projected to grow beyond \$150 million in the 2025/2026 financial year. This equates to an approximate 10% increase in losses in just three years and a 50% increase from four years ago despite exceptional circumstances. The evidence clearly shows gambling losses and harm in Council's jurisdiction continues to rise despite an increased focus and understanding of gambling harm.

Incremental change is no longer sufficient, nor is remaining silent. The revised policy presents an opportunity for Council to strengthen its leadership role by advocating for the implementation of all recommendations from the "You win some, you lose more" report, supporting mandatory loss limits, stronger consumer protections and a public health approach that places harm prevention ahead of gambling industry interests.

We encourage Council to regularly evaluate, monitor and publicly report on the implementation and effectiveness of its Gambling Policy to ensure residents and ratepayers remain informed of its objectives, actions, outcomes and progress against identified commitments.

Most importantly, GHLEE encourages Council to continue prioritising the voices of people with lived and living experience of gambling harm, because those closest to the harm are often closest to the solutions.

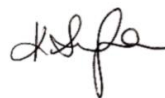
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