

Parliament of Victoria
Victorian Legislative Council Legal and Social Issues Committee
E: homelessnessinquiry@parliament.vic.gov.au

Alliance for Gambling Reform submission to Parliamentary Inquiry into Homelessness

The Alliance for Gambling Reform (Alliance) welcomes the opportunity to provide a submission to the Victorian Legislative Council Legal and Social Issues Committee (Legislative Council) inquiry into homelessness in Victoria.

The Alliance is a national advocacy organisation and registered health charity formed out of an urgent need to address the harmful and unfair impacts of gambling and its normalisation in Australia. We are a non-partisan alliance of more than 60 organisations who share our objectives of preventing and minimising harm from gambling, and we are entirely funded by individuals, foundations and local governments that share a commitment to reducing harm from gambling.

As an organisation we are committed to addressing co-occurring social and public health issues that exist alongside, contribute to, and result from gambling harm. To treat gambling harm as if it exists in a silo is doing injustice to those harmed.

Our organisation's touchpoints with homelessness in Victoria are primarily through our work alongside advocates who take part in our Champions for Change program. The Champions for Change program aims to support and empower people directly impacted by gambling harm to be powerful advocates for reform. Our other points of contact are through our partner organisations who are working within the broader public health sector, and through the 22 Alliance Leadership Councils who work closely with us on gambling reform. As such, the Alliance will respond to the Legislative Council's Terms of Reference 2 and 3.

In summary the Alliance's submission makes the following recommendations:

1. More research funding be committed to explore the comorbidity of gambling harm and experiences of homelessness.

2. Service providers within the homelessness sector should be given support to develop targeted strategies to encourage early disclosure by their clients. These strategies could include staff training, communication strategies, and client assessment procedures which reflect a knowledge of gambling harm. Better identification of gambling impacts will lead to more referrals to gambling counselling, which will be to the overall benefit of clients.
3. Gambling harm be included in the next round of the Victorian Government's health plans and strategies, so as to provide the health sector with a mandate to address an issue their clients present with frequently.
4. The Victorian Government and the Federal Government further collaborate to introduce reforms to prevent and minimise harm from online wagering (sports gambling).
5. The maximum bet limit is further reduced, to one dollar per bet.
6. Linked jackpots, particularly jackpots linked across sites, are abolished.
7. Virtual reels of a game be required to have an equivalent number of symbols in total.
8. As even as possible a distribution of winning symbols across all reels of a game be required.
9. That a scheme be introduced so that a person can set an enforceable limit on how much they are willing to lose. The current limit setting system allows people to continue gambling after they reach the limit they have set themselves.
10. The requirement of provision of accurate information about game characteristics via an unavoidable, clearly presented information screen. This should include the odds of winning the major prize, number of symbols on each reel, and number of winning symbols on each reel.

***Language disclaimer**

A widely used, standard definition of disordered gambling is that "Problem Gambling is characterised by difficulties in limiting money and /or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community"¹ While there is no agreement on definitions of "difficulties" or the scale of "adverse consequences" which would constitute harm, the Alliance believes that any difficulties and any adverse consequences are harmful. We avoid the use of the term "problem gambler" as it is stigmatising and victim-blaming. We recognise the Problem Gambling Severity Index used in clinical settings, but consider that even those gamblers characterised using that system at being at low or medium risk, can in fact experience significant harm. The Alliance aims to prevent or reduce harm from gambling, regardless of the risk factor of

¹ P. Neal et al. 2005. *Problem gambling and harm: Towards a national definition*. Commissioned for the Ministerial Council on Gambling and prepared by the South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide.

individual gamblers, and particularly with regard to their families, carers, colleagues and community, who are also impacted by gambling.

Response to Legislative Council Terms of Reference 2: *Investigate the many social, economic and policy factors that impact on homelessness*

The link between gambling and homelessness is anecdotally known within narrow sector limits in Australia. However, there is a relative lack of research into the co-occurrence of gambling and homelessness in Australia. Population surveys of Australia's 'problem gamblers' tend to underestimate the number of people experiencing harm from gambling. This was acknowledged in the 1999 Productivity Commission, which noted that 'Others, such as the homeless... may also have a greater likelihood of being problem gamblers, but are outside the sample frame [of the survey].'² These factors mean that the impact of gambling on homelessness, and indeed the impact of homelessness on gambling, has not been reflected in Victoria's *Homelessness and Rough Sleeping Action Plan, A Better Place: Victorian Homelessness 2020 Strategy*, nor in other state public health strategies.

In 2001, Hanover Welfare Services (Renamed Launch Housing in 2015), along with BreakEven (Renamed Gambler's Help in late 2000) published a report titled *Gambling the Home Away*. This report sought to investigate the association between 'problem gambling' and homelessness, and to better understand the pathways from gambling to an individual experiencing a housing crisis. This study of Hanover clients determined that prevalence of 'problem gambling' amongst households experiencing homelessness ranged from 5% to 15%. The study undertaken by BreakEven reported that one-third (31%) of their clients reported a housing crisis as a result of their gambling, and 12% had experienced actual loss of their housing attributed to gambling.³

To summarise, the report found that financial hardship caused by 'problem gambling' meant that there are significant risks of homelessness for people experiencing gambling harm. In addition to this, the report acknowledged that the loss of pivotal support networks proved to be a devastating effect of gambling harm, leading to impacts on the gambler's health, including loss of sleep, depression and suicidal behaviour. These experiences led those they surveyed to feel isolated from

² Productivity Commission. Australia's Gambling Industries. Volume 1: Report (Parts A & C), 1999.

³ Emma Antonetti & Michael Horn. *Gambling the Home Away: A study of the impact of gambling on homelessness*. Hanover Welfare Services. 2001. Available here.

their community, and in turn gamble for longer periods of time with larger amounts of money to escape their feelings of isolation.⁴ This increased gambling harm was often funded by people accumulating large debts and/or engagement in illegal activities such as fraud.⁵

20 years ago, this Hanover report estimated that ten percent of demand at homelessness services is directly linked to gambling harm. Our best proxy for gambling harm is gambling losses, and while some forms of gambling have seen slow increases in total losses, others are rapidly increasing. Sports gambling is the only form of gambling for which participation rates in Australia have increased over the past two decades.^{6,7} In 2018, the Victorian Responsible Gambling Foundation reported that sports gambling was more prevalent in 2016 than in 2010. Research by Gainsbury et al. suggests that sports gambling is the fastest growing form of gambling in Australia, with preliminary findings reporting that sports gambling prevalence increased by 13% in the decade following Hanover's study, from 1999 to 2011.⁸ We can only assume given the increase in Victorians harmed by gambling and in relation to those experiencing homelessness in the past decade, that Hanover's 2001 estimation that at least 10% of people experiencing homelessness in Victoria are homeless due to some experience of gambling harm would now be somewhat conservative.

Research exists that places the prevalence of people experiencing both gambling harm and homelessness significantly higher. In 2009, the Australian Institute of Health and Welfare (AIHW) identified that 18.4% of clients of the Supported Accommodation Assistance Program had gambling-related issues as their main reason for seeking accommodation and support.⁹ In 2018, the Victorian Responsible Gambling Foundation published a report that estimated that the cost to the Victorian Government of homelessness services due to gambling problems in 2014 - 2015 was \$19.7m.¹⁰

Response to Legislative Council Terms of Reference 3: *Identify policies and practices from all levels of government that have a bearing on delivering services to the homeless*

⁴ Antonetti & Horn, 2001.

⁵ Ibid.

⁶ Andrew Armstrong & Megan Carroll. *Gambling Activity in Australia: Findings from wave 15 of the Household, Income and Labour Dynamics in Australia (HILDA) Survey*. Australian Gambling Research Centre, Australian Institute of Family Studies, 2017.

⁷ Nerilee Hing et al. *Interactive Gambling*, Melbourne, Gambling Research Australia, 2014.

⁸ Sally Gainsbury et al. *How the Internet is Changing Gambling: Findings from an Australian Prevalence Survey*, Journal of Gambling Studies, 2013, 1-16.

⁹ Australian Institute of Health and Welfare (AIHW), 2009, *Problem gambling among those seeking homelessness services*. [Link](#).

¹⁰ Matthew Browne et al. 2017. *The social cost of gambling to Victoria*. Victorian Responsible Gambling Foundation.

The policy implications resulting from investigation into the link between homelessness and gambling harm are in many ways self-evident. The outcome of homelessness is frequently a result of gambling harm, and the relationship between experiences of homelessness and gambling needs to be further examined. We submit that:

- More research funding be committed to explore the comorbidity of gambling harm and experiences of homelessness.

The Alliance acknowledges that it is an advocacy organisation and does not work within the realm of service provision. Despite this, we submit that:

- Service providers within the homelessness sector should be given support to develop targeted strategies to encourage early disclosure by their clients. These strategies could include staff training, communication strategies, and client assessment procedures which reflect a knowledge of gambling harm.
- Better identification of gambling impacts will lead to more referrals to gambling counselling, which will be to the overall benefit of clients.

As an organisation, we prioritise gambling harm prevention and minimisation as sound public health approaches. Without a consistent public health approach to gambling harm, more Victorians will be harmed by gambling, and potentially in turn harmed by experiences of homelessness. We submit that the following harm prevention and minimisation measures are considered:

- The inclusion of gambling harm in the next round of the Victorian Government's health plans and strategies, so as to provide the health sector with a mandate to address an issue their clients present with frequently.
- Further collaboration between the Victorian Government and the Federal Government to introduce reforms to prevent and minimise harm from online wagering (sports gambling).

The following interventions are recommended for EGM operation and can be achieved via further amendments to the Victorian Appendix to the Australian/NZ Gaming Machine National Standard:

- Further reduction in the maximum bet limit, to one dollar per bet.

- Abolition of linked jackpots, particularly jackpots linked across sites.
- Requiring all virtual reels of a game to have an equivalent number of symbols in total.
- Requiring as even as possible a distribution of winning symbols across all reels of a game.
- Requiring that a scheme be introduced so that a person can set an enforceable limit on how much they are willing to lose. The current limit setting system allows people to continue gambling after they reach the limit they have set themselves.
- Provision of accurate information about game characteristics via an unavoidable, clearly presented information screen. This should include the odds of winning the major prize, number of symbols on each reel, and number of winning symbols on each reel.

In addition, we suggest the following policy changes (to occur through other mechanisms):

- A reduction on ready access to cash in venues (the current ban on cash withdrawals in venues should include a ban on EFTPOS cash-out).
- A reduction on EGM venue operating hours (via amendments to the Responsible Gambling Code of Conduct) to 10am-12am as recommended by the 2010 Productivity Commission.

Lived experience testimony of gambling harm and homelessness

The Alliance's Champions for Change program is made up of an incredible group of people who have experienced gambling harm, and are taking action to influence changes that will benefit the community and prevent further gambling harm. Our positions and policies are developed in consultation with lived experience advocates on the principle that those closest to the harm are those closest to the solutions. Anecdotally, many of the people involved in Champions for Change have experienced homelessness. We have included some of their stories, in their own words.

Paul (38) is a recovering gambler from Kensington, Victoria.

I was introduced to gambling at a very young age, it quickly became a part of my everyday life.

The rental money was my last need, I always pushed the boundaries of what my money was used for. Food came before shelter. I could push that, always manipulating the landlord and people I was sharing with.

There's a history of years of couch surfing and living with others, I suppose it's always been a dependency on others for rental. Staying at peoples places without paying rent for many years.

I remember that one time, I ran away from a place because I couldn't pay the rent for one week. After that, I then started bailing out of places.

Moving overseas, we stayed with family members, and my parents helped with the rental.

When I worked in Hong Kong, the rent was taken from my pay, so it was paid before I got money.

When I came back to Australia I was boarding, rent-free, with my brother in his house. I eventually lost/gambled away this house. When my brother lost the house, we had to find somewhere else to live. He kicked me and my parents out and we went to my grandmothers' community housing home.

Then there was not enough room there, so I couch surfed at my cousins, then went back overseas, briefly. I was then back in Melbourne living in rentals with my mother, and my father stayed in Hong Kong. We rented from friends, then moved back to my grandmother's commission housing. I had half a couch, my father (when he returned) had the other half. We were sleeping head to toe.

I now live in my parents' commission housing.

This is a standby for me, but I'm looking for my own space. Applying for rentals is very hard because I have no rental history and I am 38 years old.

Carolyn (late 60s) is from Frankston, Victoria who went to prison after she took money from her workplace to gamble on poker machines. Carolyn paid back all of the money by drawing on her entire superannuation, savings, and inheritance from her father's estate. She writes of her experience in an overcrowded half-way house in 2017:

Whilst I was in prison the social worker looked into housing and found a room for me in Mount Martha... This place was horrible, 44 rooms, people that were drinking, people on drugs and people with mental illness. I felt safer in prison than I did in this room.

I had the police knock on my door in the middle of the night a few times because I had a man in the room next to me who was violent and they would knock on my door. There were people that had been there many years.

I got out as soon as I could afford to rent my own unit. It took from the end of October 2018 to March 2019 to get a private rental. I am on the DHS list but that can take years. It is tough on the

Pension because one Fortnights payment is needed for the rent as well as extra from the previous fortnights payment.

IC is a lifetime resident of Melbourne's Western Suburbs:

I've experienced and witnessed immense harm over the past 38 years, 33 while gambling and 5 whilst in recovery. I started gambling at the TAB and later on Tattsлото and Scratchies, but in 1991 I turned to poker machines which is where my life quickly declined in many ways.

I was homeless for two and a half years after my wife asked me to leave the family home due to lies and deception due to gambling and the unexplained absence of money.

I've worked as a statistical and data analyst for 31 years and estimate I've lost over one million dollars over 33 years of gambling, and have accumulated over one hundred thousand dollars in credit card debt. I lost contact with my three children, and became estranged from my family and friends and thus alone. I developed mental illness due to gambling which put my job on the line, and within a four year period I attempted to take my life on three occasions.

Conclusion

The Alliance is taking a proactive and strategic role within the Victorian community to advocate for gambling harm minimisation and prevention. We believe that existing research demonstrates that gambling harm prevention has a significant positive correlation on the prevention of homelessness and on assisting people already experiencing homelessness. The Alliance understands that issues of homelessness are common and co-occur alongside many other public health issues. However, we encourage the Inquiry to consider the relative inattention given to understanding and addressing the comorbidity of gambling harm and homelessness.

Key Contact

Ashley Sutherland
Victorian Campaigner, Alliance for Gambling Reform

March 11 2020



E: ashley.sutherland@agr.org.au

P: 0481 285 204

References

Alliance for Gambling Reform. 2020. Various lived experience testimonies of gambling harm and experiences of homelessness. Multiple locations, Victoria, Australia.

Antonetti, E. & Horn, M. 2001. *Gambling the Home Away: A study of the impact of gambling on homelessness*. Hanover Welfare Services. Melbourne, Australia. [Link](#).

Armstrong, A. & Carroll, M. 2017. *Gambling Activity in Australia: Findings from wave 15 of the Household, Income and Labour Dynamics in Australia (HILDA) Survey*. Australian Gambling Research Centre, Australian Institute of Family Studies. Melbourne, Australia.

Australian Institute of Health and Welfare. 2009. Problem gambling among those seeking homelessness services. Tullamarine, Victoria, Australia.

Browne, M., Greer, N., Armstrong, T., Doran, C., Kinchin, I., Langham, E., Rockloff, M. 2017. *The social cost of gambling to Victoria*. Victorian Responsible Gambling Foundation. Melbourne, Australia.

Gainsbury, S.M., Russell, A., Hing, N., Wood, R. and Lubman, D. and Blaszczynski, A. 2013. *How the Internet is Changing Gambling: Findings from an Australian Prevalence Survey*, Journal of Gambling Studies.

Hing, N., Gainsbury, S., Blaszczynski, A., Wood, R., Lubman, D. & Russell, A. 2014. *Interactive Gambling*, Melbourne, Gambling Research Australia. Melbourne, Australia.

Neal, P., Delfabbro, P. & O'Neil, M. 2005. *Problem gambling and harm: Towards a national definition*. Commissioned for the Ministerial Council on Gambling and prepared by the South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide.

Productivity Commission. 1999. *Australia's Gambling Industries. Volume 1: Report (Parts A-C)*. Canberra, Australia.

Productivity Commission. 2010. *Gambling. Volume 1*. Canberra, Australia.