

Manningham Gambling Policy

2024



Interpreter service

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Acknowledgement of Country

Manningham Council acknowledges the Wurundjeri Woi-wurrung people as the Traditional Owners of the land and waterways that is now known as Manningham.

Council pays respect to Elders past, present and emerging, and values the ongoing contribution to enrich and appreciate the cultural heritage of Manningham.

Council acknowledges and respects Australia's First Peoples as Traditional Owners of lands and waterways across Country and encourages reconciliation between all.

Manningham Council also values the contribution made to Manningham over the years by people of diverse backgrounds and cultures.

1 Executive Summary

The Manningham Gambling Policy 2024 (the Policy) is a long-term plan designed to reduce the level of harm experienced by the Manningham community as a result of gambling. It reflects recent changes in the gambling environment, including State legislation.

The Policy goes beyond directing people to support services to assist them once gambling has become a problem. It considers the causes and risk factors of gambling harm, and how these can be limited or prevented before harm occurs. The Policy emphasises the importance of working across a range of areas in partnership with key stakeholders and recognises the need for targeted initiatives aimed at key cohorts within the community.

The Policy is built around four key themes:

1. Education and capacity building
2. Programs and services
3. Advocacy
4. Planning and regulation

Each theme is accompanied by specific objectives, outcomes and actions to be implemented. The Policy aims to address gambling harm in Manningham by challenging community perceptions, leveraging key advocacy groups and support networks and creating social connection and community participation opportunities.

The Policy's success will be measured by its impact on community wellbeing, participation opportunities and advocacy to higher levels of government. It serves as a roadmap for Council and key stakeholders to collaborate and work towards creating a healthy, safe and resilient community.

2 Introduction

2.1 Background and purpose

Manningham Council recognises that, at harmful levels, gambling can have significant health, social and economic impacts to individuals, families and communities.

Participation in gambling activities is now more accessible than ever, with online, mobile and other forms of gambling.

The Manningham Gambling Policy 2024 (“the Policy”) outlines Council’s commitment to reducing harm from gambling within the municipality, and guides Council in its decision making on gambling harm prevention.

Manningham Council has had a Gambling Policy in place since 2004. Council’s previous gambling policies have focused predominantly on gambling harm related to electronic gaming machines (EGMs, also known as poker machines or pokies). To reflect the current evidence on gambling harm, this Policy will take a public health approach to addressing harm from various forms of gambling, including EGMs and other legal gambling products. This approach recognises the range of systemic factors that contribute to gambling harm, beyond the behaviour of the individual.

This Policy builds upon the Manningham Gambling Policy and Action Plan 2012-2017 and reflects recent changes in State and Federal legislation in relation to gambling.

2.2 Policy context

2.2.1 Federal Government

Although State Governments are responsible for the regulation of EGMS and other forms of gambling, the Federal Government has a role to play in the regulation of interactive gambling services. The Australian Government, together with the State and Territory Governments, has introduced a suite of minimum consumer protections for people who gamble online through the National Consumer Protection Framework for Online Wagering.

The National Framework consists of 10 measures to empower individuals and minimise the harm from online gambling. The measures provide easy-to-use tools and information to support people to better control their gambling. They include a voluntary opt-out pre-commitment scheme and BetStop, the national self-exclusion register. The National Framework applies to all licensed online wagering service providers and will offer protection to all active account holders.

2.2.2 State Government

The policy landscape surrounding gambling in Victoria has recently seen significant legislative change. In July 2023 the State Government introduced a set of landmark reforms in an effort to reduce gambling-related harm at venues with electronic gaming machines (EGMs). These measures included:

- Mandatory venue closures for gaming machine areas in all venues (with the exception of Crown Casino) from 4am – 10am, to be introduced by mid-2024;
- Mandatory pre-commitment limits and carded play, with set loss limits of no more than \$100 loaded at a time (down from \$1,000); and

- Reducing the spin rates on new EGMs to three seconds per game to slow games down and limit the amount that can be lost.

Gambling regulator, the Victorian Gambling and Casino Control Commission (VGCCC), has also introduced a ban on betting for all under 19 sports competitions, and any betting on the performance of individual players who are under 18 in junior and senior sport. The ban commenced on 3 August 2023.

Additionally, from mid-2024 the Victorian Gambling and Casino Control Commission (VGCCC) will assume a larger role in gambling harm minimisation, taking over most of the functions of the Victorian Responsible Gambling Foundation.

The Manningham Gambling Policy 2024 has considered these recent changes to the State and Federal gambling policy landscape.

2.2.3 Local Government

The Manningham Planning Scheme requires a planning permit to install or use a gaming machine. The Planning Policy Framework provides the framework for decision making to ensure applications are determined in favour of net community benefit and sustainable development.

As part of the policy neutral translation into the Planning Policy Framework, *Clause 22.18 Gaming* was translated into a new schedule to *Clause 52.28 Gaming* which was approved in January 2023, as part of Amendment C133. This provision seeks to:

- Consider social and economic impacts of gaming and the wellbeing of Manningham's communities
- Minimise opportunities for convenience gaming, by discouraging facilities being located in shopping centres and strip shopping centres.
- Discourage the location of gaming machines in and proximate to, disadvantaged areas and vulnerable communities.

2.3 Other key stakeholders

Council works closely with the following stakeholders to reduce harm from gambling:

- Local Government Working Group on Gambling (LWGOG) – run by the Victorian Local Governance Association (VLGA)
- Victorian Gambling and Casino Control Commission (VGCCC) – the independent statutory authority that regulates Victoria's gambling industries
- Alliance for Gambling Reform – a national advocacy organisation that works to prevent and minimise the harm from gambling
- Gambler's Help Eastern – provides a range of professional support services for those impacted by gambling harm in the Eastern Metropolitan Region of Melbourne
- Victorian Responsible Gambling Foundation – statutory authority created to fund research and other activities that add to the knowledge and understanding of gambling harm
- Eastern Community Legal Centre – provides free legal assistance to people who live, work and study in Melbourne's east. This includes community education sessions.
- Access Health and Community – Manningham's local community health service that provides a range of support services, including counselling.

2.4 Gender impact assessment (GIA)

A Gender Impact Assessment (GIA) was undertaken in 2021 for the Manningham Gambling Policy and Action Plan 2012-2017.

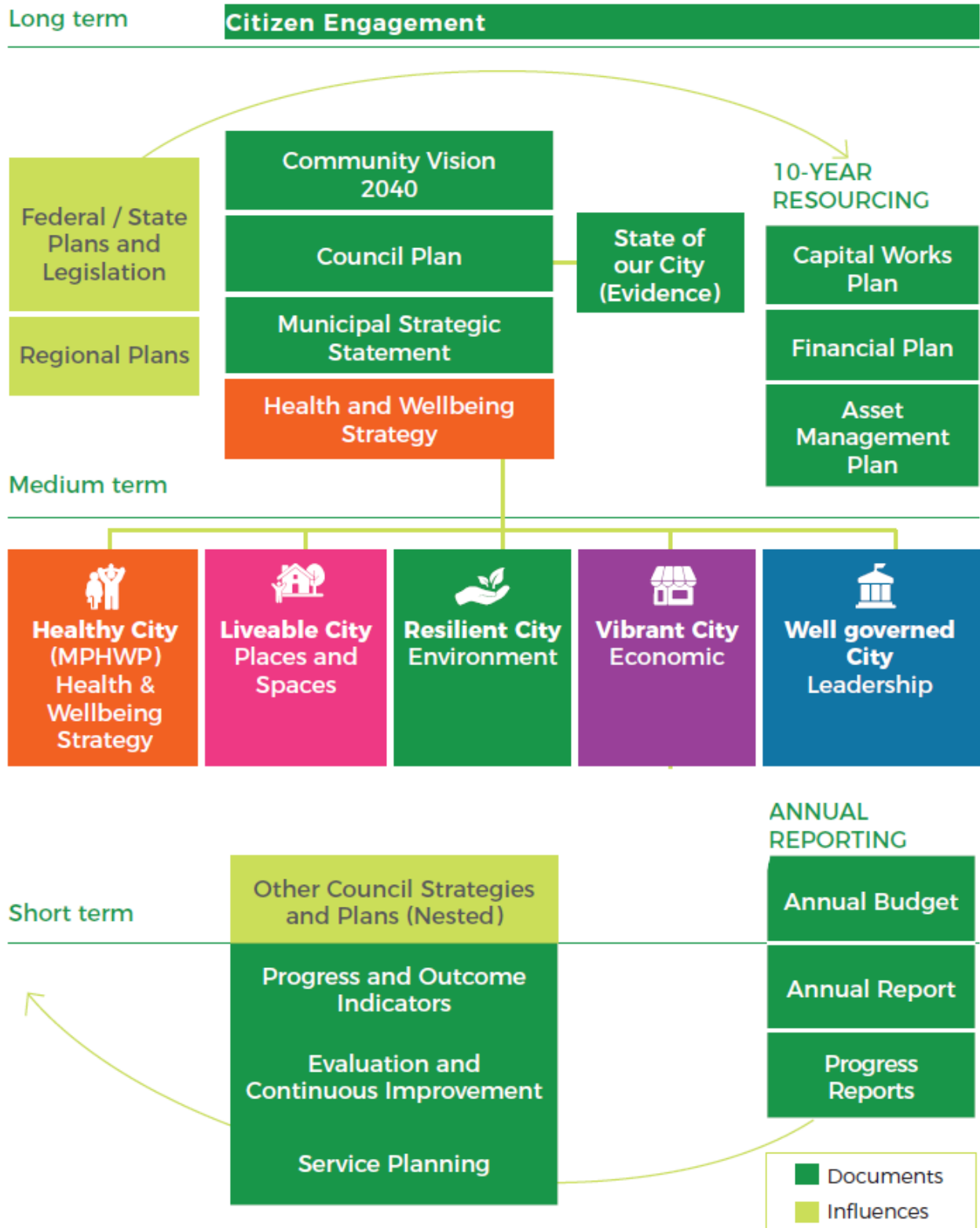
Recommendations from the GIA included:

- The development of a gambling policy that adopts a public health approach;
- Engaging people of different gender identities in the policy development and consultation process;
- The gambling policy should consider all forms of gambling, including online gambling;
- The research underpinning the policy should consider the gendered nature of gambling-related harm and the underlying drivers of gambling which cause harm; and
- Strategies should include provision of alternative spaces, programs, increased education and awareness-raising and advocacy.

Findings from the GIA have been used to inform the development of this Policy. Council is committed to considering the impact of gender and intersectionality in future initiatives and actions.

2.5 Strategic alignment

Gambling is an action area of the Council Plan and Health and Wellbeing Strategy 2021-2025. The Policy sits beneath the Healthy City priority of the Council Plan, aligning with and supporting council and community ambitions in many strategic areas.



3 Gambling harm in Manningham

Gambling is recognised as a significant, global public health concern. All forms of gambling have the potential to affect the health and wellbeing of individuals and families. Gambling harm refers to any negative consequence experienced by an individual, family unit or community due to participation in gambling. Gambling-related harm involves more than losing money or experiencing financial problems. It can also include:

- health problems including emotional, psychological distress or physical issues;
- issues with relationships with family or friends;
- problems with work or study;
- cultural problems; and
- criminal activity.

It is becoming increasingly recognised that gambling-related harm has direct impacts on the person who gambles and indirect impacts on others including their families, friends and the wider community. EGMs are recognised as posing the greatest risks to existing and potential problem gamblers. However, harms from participation in other forms of gambling, such as online gambling, are of increasing concern.

Council is already undertaking activities to minimise harms to the Manningham community from gambling. This includes implementation of internal organisational policies such as: prohibiting access to gambling-related material on IT devices in all Council buildings, including the Civic Centre, Depot and Whitehorse Manningham Library branches; not providing financial support to organisations that are directly involved in gambling; and working with partners to advocate to the State Government for legislative change. Council has also included restrictions in relation to gambling for contracted suppliers delivering services on council's behalf. Clauses on partnerships, sponsorships and advertising associated with gambling organisations are included within their service contracts.

Nonetheless, additional, targeted efforts are required to increase community understanding and awareness of the risks and signs of gambling harm to strengthen our preventative public health approach. This approach is outlined further in Section 4.

3.1 Gaming venues

Manningham currently has six gaming venues with EGMs; four of which are hotels and two of which are clubs. Five of these venues also have TAB (racing and sports betting) facilities, with an additional three standalone TAB outlets within the municipality.

Venue	Address	Gaming Facilities
1. Cherry Hill Tavern	189 Reynolds Road, Doncaster East	EGM, TAB
2. Doncaster Hotel	855 Doncaster Road, Doncaster	EGM, TAB
3. Manningham Club	1 Thompsons Road, Bulleen	EGM, TAB
4. Shoppingtown Hotel	13-21 Williamsons Road, Doncaster	EGM, TAB
5. Templestowe Hotel	23-29 Parker Street, Lower Templestowe	EGM, TAB
6. Veneto Club	191 Bulleen Road, Bulleen	EGM
7. Bulleen TAB	9-15 Templestowe Road, Bulleen	TAB

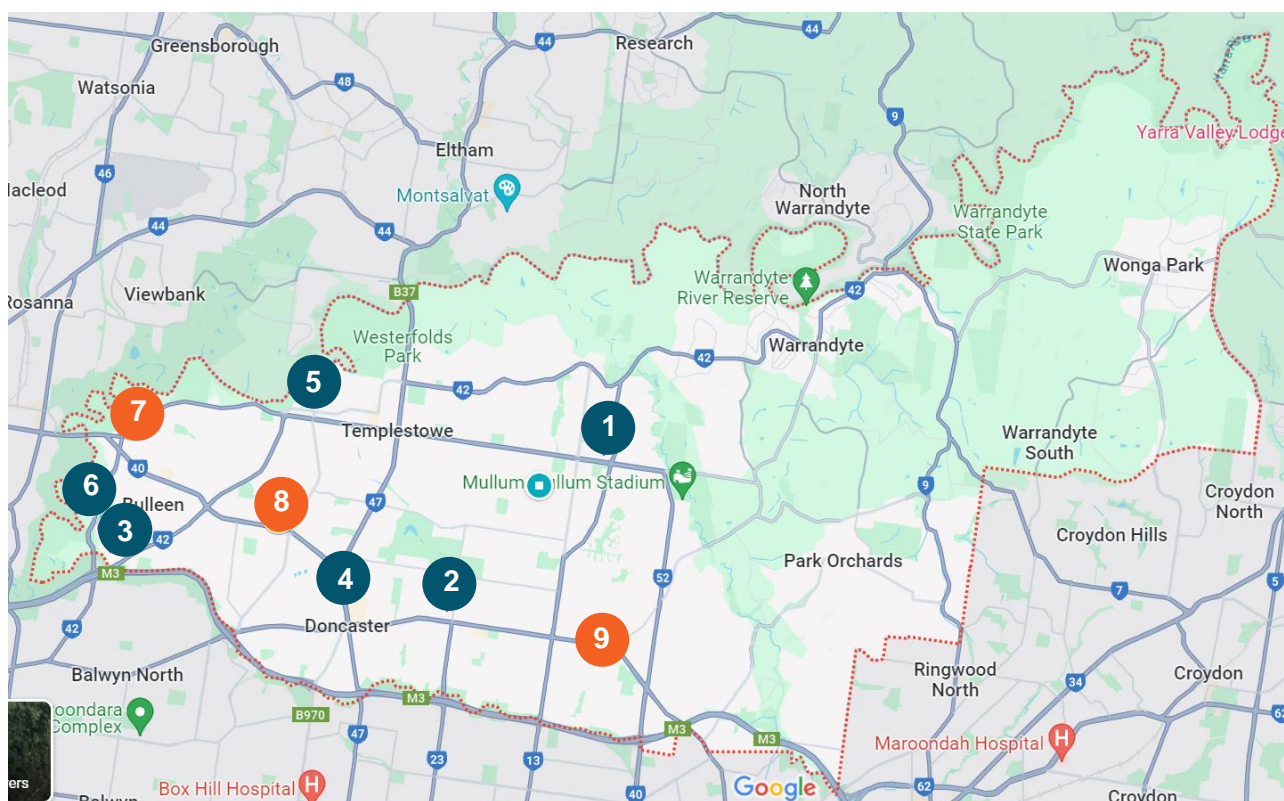


Figure 1: Location of Manningham gaming venues

3.2 Electronic gaming machines (EGMs)

There are currently 500 licensed EGMs in Manningham. The municipality is currently 483 EGMs below the municipal cap of 945 EGMs.

In the 2022/23 financial year, expenditure on EGMs in Manningham was \$60.3 million. In this Financial Year, compared to metropolitan municipalities and Victoria:

- Manningham’s average venue size was larger and the average expenditure per venue was higher; and
- Expenditure per attached EGM entitlement in Manningham was just below the average for metropolitan municipalities and higher than the average for Victoria.

Between 2021/22 and 2022/23 financial years EGM expenditure in Manningham increased by 37 per cent. This is slightly lower than EGM expenditure across all metropolitan municipalities (38 per cent) but higher than EGM expenditure for all Victorian municipalities. In the 2022/23 Financial Year the Shoppingtown Hotel had both the highest expenditure and the highest expenditure per attached EGM entitlement in Manningham.

Venue	Address	Attached EGM Entitlements	Licensed EGM's	Venue Type	Exp 2022/23	Exp per Attached EGM Entitlement 2022/23
1. Cherry Hill Tavern	189 Reynolds Road, Doncaster East	50	50	Hotel	\$8,084,906	\$161,698
2. Doncaster Hotel	855 Doncaster Road, Doncaster	85	100	Hotel	\$16,069,149	\$160,691
3. Manningham Club	1 Thompsons Road, Bulleen	90	100	Club	\$4,065,993	\$40,660
4. Shoppingtown Hotel	13-21 Williamsons Road, Doncaster	87	100	Hotel	\$18,366,273	\$183,663
5. Templestowe Hotel	23-29 Parker Street, Lower Templestowe	60	60	Hotel	\$8,434,791	\$140,580
6. Veneto Club	191 Bulleen Road, Bulleen	90	90	Club	\$5,337,239	\$59,303
Total Manningham		462	500		\$60,358,351	N/A
Average venue size						
Manningham		77				
Metro		61				
Victoria		54				
Average expenditure per venue						
Manningham					\$10,059,725	\$124,432
Metro					\$7,663,313	\$125,601
Victoria					\$6,204,651	\$114,962

Table 1: EGM expenditure, 2022/23 financial year. Source: VGCC

In the 2022/23 financial year, EGM expenditure in the municipality was the highest it has been in the past decade:

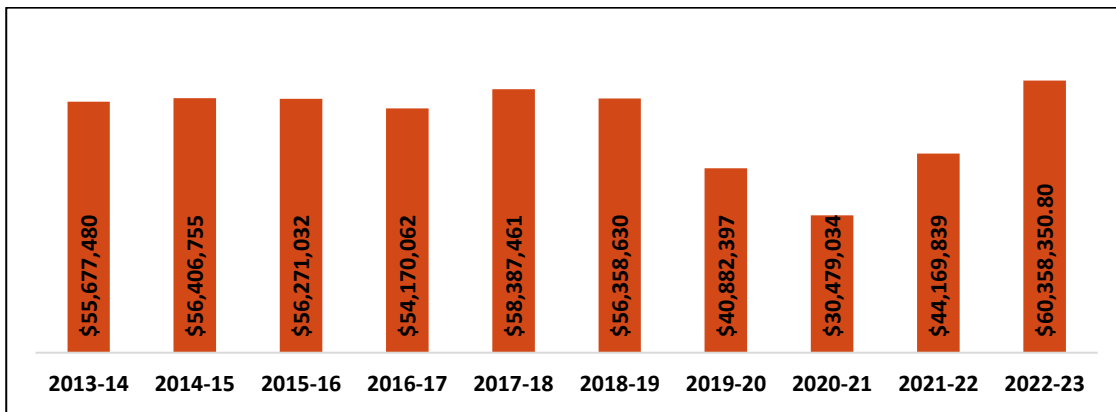


Figure 2: EGM expenditure, Manningham 2012/13 to 2022/23. Source: VGCCC

Following a reduction in EGM expenditure due to the closure of gaming venues during the COVID-19 pandemic, Manningham has experienced a sharp increase in average monthly EGM expenditure and average monthly expenditure per attached EGM when venues opened in the 2022/23 financial year.

3.3 Sports and online gambling

There is growing concern about the harm caused by online gambling and sports betting using the internet and mobile apps.

Online gambling is difficult to regulate, widely promoted and covers a wide range of sporting codes and other topics. Local data on participation in online forms of gambling is limited, however participation in sports betting is on the rise, and according to the Australian Institute of Health and Welfare was the gambling product with the third highest participation rate in 2022 (34%), behind lotteries (64%) and race betting (38%).

A 2022 National Gambling Trends Study conducted by the Australian Gambling Research Centre surveyed Australian adults who bet online on sports or races on a regular basis (at least fortnightly). The following were key findings from the study:

- Most participants spent money betting on horse racing (91%) and sports (86.7%), followed by gambling on lotteries (81.7%) and poker machines/'pokies' (67.6%).
- Participants spent around \$768 per month (median) across all types of gambling, including \$125 on horse racing and \$80 on sports, with over 1 in 4 (26.7%) reporting using credit cards to gamble
- Median monthly expenditure on gambling activities was higher for men and the younger age group (18-34 years).
- Participants' most recent session of online betting lasted 2.5 hours on average (median) and almost two-thirds (63.0%) reported that they had gambled alone.
- More than half (55.1%) reported having multiple online betting accounts and 13.3% had used an offshore (illegal) online betting account during the past 12 months.
- Only a minority (6.3%) of regular online bettors reported seeking help for gambling harm (in the past year). The most common reasons reported for not seeking help were embarrassment (46.5%) and not thinking help would change their gambling (23.8%).

While online gambling and sports betting is outside the remit of Council's direct jurisdiction, we

recognise the importance of working towards minimising levels of expenditure and participation on this type of gambling, as well as the 'normalisation' of gambling in Australia.

3.4 Community sport and recreational clubs

There are a number of ways that local sporting clubs may be associated with gambling:

- Through ownership or operation of electronic gaming machines;
- Receiving direct sponsorship or benefits from a gambling venue;
- Gambling fundraisers that clubs host – poker nights, raffles etc;
- Normalising gambling through club practices/culture e.g. having horse racing on tv's or encourage patronage of gambling venues;
- Receiving sponsorship or benefits from a betting company; or
- Hosting events or functions at gambling or racing venues.

Gaming venues that hold a club licence (for Manningham the Veneto Club and Manningham Club) are required by law to provide community benefit that is equal to at least 8.33 per cent of its net gaming machine revenue. This can be provided through supporting a range of community groups or sporting clubs.

Whilst Council recognises the economic benefit to community groups and clubs through this arrangement, it could be argued that the harmful public health impacts of EGMs outweigh these financial contributions. This policy does not seek to end such contributions. The aim is to learn more about the relationship between all parties and the ways gambling is being promoted on Council owned or managed land.

This policy also seeks to dissuade sporting clubs and community groups from owning or operating EGMs in facilities that are on Council-owned or managed land. One way this is already being supported is by restricting eligibility for financial support from Council for clubs who receive funding from organisations whose primary focus is gambling. This is implemented by way of Manningham's Community Grants Policy 2022-25.

There are currently no EGMs on Council-owned or managed land in Manningham. Council seeks to maintain this position to support a reduction in gambling related harm for the Manningham community.

3.5 Vulnerable groups

Anyone can experience gambling harm and any gambling behaviour can be harmful. However, research indicates that some groups are more likely to experience harm from gambling than others. These include:

- **Young people:** young people are influenced by a range of factors, including an increased likelihood of risk-taking behaviour, availability and accessibility of gambling, and the influence of gambling advertising;
- **Older adults:** older adults face later life transitions such as retirement, fewer opportunities to socialise, loss of a partner or friends. This social isolation can result in an increase in gambling behaviour; and

- **Women who are experiencing family violence:** gambling related stressors such as financial losses or relationship stress can also lead to escalating violence. In some cases, women experiencing violence may use gaming venues as a safe space away from home.

4 Our approach

Previous approaches to addressing gambling harm have focused on the responsibility of the individual to change their behaviour in order to prevent harm. This approach has been reinforced through the use of terms such as “problem gambling” or “responsible gambling”.

Council challenges this approach, as it fails to acknowledge the influence of the gambling industry and the addictive nature of harmful gambling products.

Through this Policy, council affirms its commitment to a comprehensive public health approach to preventing harm from gambling. Public health measures aim to prevent harm from occurring in the first place or reduce harm when it is occurring in its early stages through early intervention.

This approach is consistent with council’s role to protect, improve and promote public health and wellbeing, as required under the Public Health and Wellbeing Act 2008.

“A comprehensive public health approach to gambling:

- a) Recognises that gambling harm is caused by a complex interplay of individual, socio-cultural, environmental, commercial and political determinants; and*
- b) Advocates for independent (i.e. free from gambling industry influence) policies and strategies that seek to prioritise health and wellbeing, protect individuals, their communities and families from being harmed by the gambling industry, its products and practices”*

- *Health Promotion Journal of Australia, 2023*

Put simply, a public health approach recognises the shared responsibility to address gambling harm, from individuals and community groups, to businesses, corporations and governments at all levels. Through this approach, council is not looking to prohibit gambling activities, but to ensure that harm from these activities is minimised.

5 Key themes

Our key themes to address gambling related harm are informed by an extensive consultation campaign, including:

1. Workshop with Councillors to understand their perspective on council’s role in addressing gambling harm
2. A community survey to understand knowledge of gambling harm in Manningham
3. One on one conversations with community members
4. Workshops with each of Manningham’s advisory committees to understand how Council should prioritise its resources in addressing gambling harm

The following themes have been developed to respond to identified need and are deemed to be the most influential within council's area of influence in reducing the risk of harm. The themes aim to maximise Council's investment and provide a strategic structure to guide future actions.

The four themes are:

1. Education and capacity building
2. Programs and services
3. Advocacy
4. Planning and regulation

Each theme includes an objective, outcomes and actions on how it will be achieved. Each action identifies Council's role as per the table below.

Council's Role	Example
Provider: To implement projects, programs and campaigns for the community that address gambling harm.	Initiate campaigns, incentives or educational support programs.
Facilitator: To establish partnerships and collaborate with stakeholders, to create programs and community participation opportunities.	Partner with key stakeholders and provide contribution (knowledge, expertise, funding, network opportunities) to roll out programs.
Advocator: To support a reduction in gambling harm through promotion and influencing decision making, rather than direct involvement.	Advocate to key stakeholders, including higher levels of government, to address gaps and influence government decision making.
Regulator: To assess planning permit applications and undertake compliance action in relation to gambling on an as-needs basis.	Apply the provisions of the Manningham Planning Scheme to any applications for gambling facilities to provide net community benefit.

For gambling related harm to be reduced or prevented, key stakeholders must have commitment to and understanding of the Strategy and their organisation's role in driving it. Maintaining and expanding cross-sector relationships is critical to the Policy's success.

The actions in each priority area build on Council's current effort and reflect changing systems and structures as a primary approach to support public health and wellbeing at a population level. This is consistent with Council's Health and Wellbeing Strategy. Actions will be reviewed annually with all stakeholders. A progress report will be presented to council as part of the annual Health and Wellbeing Strategy Progress Report.

6 Action plan

6.1 Theme 1: Education and capacity building

Objective: To increase community awareness and understanding of the risks of gambling harm.

No.	Action	Indicator Measure	Timing	Council Role	Lead	Stakeholder
1.1	Use evidence-based public health messaging to increase awareness of gambling harm among key cohorts	Minimum three community education sessions on all forms of gambling delivered with key partners	2024/25	Provider Facilitator	Social Planning & Community Strengthening	Eastern Community Legal Centre Department of Health (formerly Gambler's Help) Manningham Neighbourhood Houses
1.2	Support national gambling harm awareness campaigns	Participation in Gambling Harm Awareness Week activities	Annually	Facilitator	Engaged Communities	Social Planning & Community Strengthening
1.3	Source and maintain accurate data to understand the extent of harm from all forms of gambling in Manningham	Gambling data and relevant planning permits monitored	Ongoing	Provider Facilitator	Social Planning & Community Strengthening	VGCCC Statutory Planning
1.4	Work with sporting clubs and community groups to increase awareness of the risks of gambling harm and reduce reliance on the gambling industry as a revenue stream	Community education session on gambling harm and sponsorship delivered	2024/2025	Provider Facilitator	Recreation and Leisure Aligned Leisure	Local sporting clubs Social Planning & Community Strengthening Alliance for Gambling Reform

6.2 Theme 2: Programs and services

Objective: To provide opportunities for social connection and community activities as alternatives to gambling.

No.	Action	Indicator Measure	Timing	Council Role	Lead	Stakeholder
2.1	Investigate opportunities to increase operating hours at key community facilities to provide safe community spaces and activities	Open Library self-service hours continued at Warrandyte Library. Options to expand this model considered when implementing the Community Infrastructure Plan.	2025/2026	Provider Facilitator	Community Projects & Planning Whitehorse Manningham Libraries	Social Planning & Community Strengthening
2.2	Identify opportunities to increase participation in social, leisure, entertainment and recreation activities	Social connection programs delivered in partnership with key stakeholders	Ongoing	Provider Facilitator	Social Planning & Community Strengthening	Healthy Ageing Recreation and Leisure Access Health and Community Neighbourhood Houses
2.3	Support organisations that provide non-gambling activities or services that address the impacts of gambling harm	Included as a selection criterion within the Community Grants Guidelines as part of annual review	Annually	Facilitator	Community Grants	Social Planning & Community Strengthening

6.3 Theme 3: Advocacy

Objective: To advocate to state and federal governments for evidence-based methods to prevent harm from EGMs and other forms of gambling.

No.	Action	Indicator Measure	Timing	Council Role	Lead	Stakeholder
3.1	Continue to work with peak bodies to advocate for regulatory change in relation to all forms of gambling	Advocacy campaigns supported	Ongoing	Advocator Facilitator	Alliance for Gambling Reform LGWGOG	Social Planning & Community Strengthening
3.2	Remain agile in line with changing legislation, regulation and gambling industry behaviour to guide advocacy efforts	Active participation in regional networks e.g. LGWGOG	Ongoing	Advocator Facilitator	Social Planning & Community Strengthening	Neighbouring LGAs VLGA Alliance for Gambling Reform
3.3	Explore opportunities for additional funding to support advocacy efforts in Manningham	Annual funding opportunities sought	Annually	Advocator Facilitator	Social Planning & Community Strengthening	LGWGOG
3.4	Keep the community informed of Council's advocacy role and efforts in addressing gambling related harm	Biannual updates provided via Manningham Matters, council website and social media	Biannually	Provider Facilitator	Social Planning & Community Strengthening	Engaged Communities

6.4 Theme 4: Planning and regulation

Objective: To demonstrate leadership in the planning, management and regulation of gambling within Manningham.

No.	Action	Indicator Measure	Timing	Council Role	Lead	Stakeholder
4.1	Implement measures to eliminate gambling activities on council owned/managed land	Council leasing agreements reviewed Gambling venues prohibited from using Council-owned assets	2026/2027	Regulator Provider	Facilities Management	Social Planning & Community Strengthening
4.2	Implement measures to eliminate gambling advertising on council owned/managed land	Council leasing agreements reviewed Usage of electronic scoreboards at local sporting grounds reviewed	2026/2027	Regulator Provider Facilitator	Facilities Management Recreation and Leisure	Social Planning & Community Strengthening
4.3	Consider the social and economic impacts of applications for new gaming machines	Gaming machine applications assessed against the Manningham Planning Scheme and each application considered on its individual merits.	Ongoing	Regulator Advocator	Social Planning & Community Strengthening	Statutory Planning
4.4	Monitor State Government reforms to the Victorian Planning provisions and determine if any changes are required to the Manningham Planning Scheme	Planning Scheme amendments proposed as required	Ongoing	Regulator Advocator	Social Planning & Community Strengthening	Integrated Planning

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