

Community Engagement report: Draft Gambling Policy

October – November 2023

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1.0 Executive Summary

This report presents findings from the community consultation process on the draft Gambling Policy 2024–2028. The consultation spanned six weeks, taking place from October 16 to November 26, 2023. The primary areas of focus included assessing the community's perceptions of gambling, gathering opinions on measures Council can take to mitigate gambling harm, and collecting feedback on the draft policy.

What we did

During a six-week timeframe, the Community Impact team conducted a variety of community engagement activities, with 191 different people. These included the Shaping Banyule survey, four pop-up intercept surveys, engagement with population advisory committees, targeted involvement with RSLs and a community workshop. After collating the data, the team analysed the results. Qualitative data was coded and quantitative data was analysed using Excel, which resulted in key consultation themes. The findings were then compiled into a data summary report, serving as the basis for this report.

Observations in the data

Opinion of draft Gambling Policy

Overall, community consultation indicates that there was general support for the draft Gambling Policy 2024–2028. Most respondents to the Shaping Banyule survey (72%) expressed support for the policy. Qualitative comments on the draft policy were mostly positive, highlighting support for the policy's focus areas and commitments, recognition of the need for government intervention, and a call for more emphasis on removing Electronic Gaming Machines (EGMs). Negative feedback focused on a desire for a stronger response to gambling harm, acknowledgment of the limited control Council has over the gambling sector, and requests for more research and evidence in relation to gambling (particularly online gambling), which is currently unavailable.

Opinion of gambling in Banyule

Overall, community perception of gambling was predominantly negative, with concerns about its harmful, problematic, and dangerous impacts. Negative themes include the belief that gambling is exploitative, harmful to vulnerable individuals, and contributes to social problems. Concerns included the ready availability of gambling in various venues, the coexistence of gambling and alcohol, inadequate regulation, and the negative effects on mental health and social issues. A considerable number advocated for a complete ban, indicating a prevailing negative sentiment towards gambling. A smaller faction acknowledged it as a recreational activity within acceptable boundaries. This latter group emphasized the positive impact on sports clubs and RSLs through funding. The contrasting views highlight the spectrum of opinions within the community.

Suggestions for Council actions

Survey participants provided suggestions for council actions in four key areas: operational responsibility, advocacy, planning, and health promotion/community support. Recommendations included banning or limiting gambling advertising, supporting venues to remove EGMs, and partnering with relevant organisations. In terms of advocacy, participants emphasized advocating for stricter regulations on EGMs, sports betting, and online gambling, as well as urging sports clubs and RSLs to divest from gambling affiliations. Planning suggestions focused on limiting licenses for EGMs. For health promotion and community support, respondents called for support for those at risk of gambling harm, increased awareness of support services, and collaboration with local organisations and health agencies to address gambling-related issues.

Changes to the draft policy

Based on consultation findings, the following revisions to the draft Banyule Gambling Policy are proposed:

1. Modifying the title of the Gambling Policy to reflect the harm minimisation and prevention approach.
2. Changes to the framework priority areas, including:
 - o Editing language and titles to increase accessibility and increase understanding.
 - o Clarify that the commitment on the ban of advertising on Council facilities is in relation to direct promotion of advertising.
 - o Add in commitments around supporting community organisations to reduce their reliance on EGMs, and regular monitoring of local EGM data.
 - o Further detail on the role of the Alliance for Gambling Reform in advocacy
 - o Add in a commitment around requiring a social and economic impact assessment for EGM permit applications.
 - o Add in a commitment around exploring the accessibility of community spaces that do not have gambling onsite, that are open late. This would support community connection opportunities away from gambling and would also offer alternative safe spaces for people seeking refuge from family violence.
3. Include definitions of the different types of gambling.
4. Several small changes to language throughout the policy, to make the document more accessible and to reiterate the role RSLs have in supporting local communities.
5. Some suggestions raised in the consultation are operational in nature and are more appropriate for inclusion in the action plan, which will articulate the actions Council will undertake to implement the Policy. These suggestions are summarised in section seven of the report.

2.0 Project overview

The Banyule Gambling Policy 2019-2022 has expired and building on the commitments within the previous policy, a Draft Banyule Gambling Policy 2024 – 2028 has been developed for consideration by Council and the community. The Draft Policy is a four-year approach and reaffirms Banyule's commitment to a preventative public health approach that addresses gambling related harm in the Banyule community.

The Draft Policy was informed by:

- An extensive literature and data review, including a targeted review for the policy's Gender Impact Assessment (ongoing, pending feedback from community consultations).
- Benchmarking of neighbouring council's gambling policies.
- Preliminary consultations with internal and external sector stakeholders, including participation in the Victorian Local Governance Association's (VLGA) working group on gambling.

In line with contemporary research and best practice, the focus is not on individual behaviour change but on the broader ecosystem in which gambling harm is produced. The Draft Policy has five (5) guiding principles:

1. A public interest approach
2. Evidence-based policy and initiatives
3. Uplifting protective factors in our community
4. Social justice
5. A collaborative approach

The Draft Policy has four (4) priority areas and under these, 15 key commitments:

1. Operational responsibility
2. Advocacy
3. Planning
4. Health promotion & community support

Council conducted consultations between 16 October 2023 and 26 November to seek feedback on the Policy, including its guiding principles, priority areas and commitments. The consultation process also provided an opportunity for community and stakeholder feedback on gambling in Banyule, to better understand the local issues experienced in relation to gambling.

Stakeholders and community members were provided with a range of engagement mediums to provide feedback and comment on the Policy, including:

- Shaping Banyule survey
- Community pop-ups and intercept survey opportunities
- Targeted youth survey
- Targeted RSL engagement
- Targeted Consultation Focus Groups at:
 - Population Advisory Committee meetings
 - Community workshop

3.0 Engagement objectives

Three objectives were identified for this project.

Objective 1

To introduce community to the changes proposed for the draft Banyule Gambling Policy 2024-2028 and share the research and engagement that has informed its development.

Objective 2

To describe Council's role and discuss the ways in which we think we can address local gambling harms – what we plan to do and why we think it will achieve the desired outcomes.

Objective 3

To invite the community to share their thoughts on the draft policy, provide feedback on the strengths, gaps and weaknesses and to gauge the extent to which community support the policy commitments.

4.0. Engagement methods

4.1 Shaping Banyule Survey

The Banyule community was invited to review and provide feedback on the draft Gambling Policy 2024 – 2028 via the Shaping Banyule Survey during its public exhibition period (16 October to the 26 November 2023). The survey was promoted on the Shaping Banyule web page, via social media platforms, email campaigns, via a specifically designed postcard handed out at community events, and was also accessed via open searches on search engines.

4.2 Community Pop-Up Consultations

The community pop-up consultations were intended to reach community members who may otherwise not engage with other avenues of engagement. Four venues and times were chosen, spanning from Thursday, 26 October 2023, to Tuesday, 14 November 2023, including Greensborough Plaza, Warringal Plaza in Heidelberg, the Malahang Festival in Heidelberg West, and the Ivanhoe Library and Cultural Hub. Location and time selection aimed to cater to varied community needs and demographics. Pop-up consultations were promoted on the Shaping Banyule web page, through social media channels, and email campaigns. Each pop-up session was facilitated by two council officers who encouraged community members to engage in a short survey providing feedback on gambling harm and the draft gambling policy. Clear signage at each location informed the community about the purpose of the consultations, fostering participation. The feedback obtained during these interactions was captured on tablets using a survey format hosted on the Shaping Banyule platform.



4.3 Targeted Youth Survey

Recognising the need to connect with the youth population in Banyule on this matter (as traditional engagement methods like Shaping Banyule or pop-up consultations were not yielding responses), we collaborated with the Banyule Youth Services team to obtain access to their dedicated email list for young individuals. We crafted a survey specifically tailored for the youth demographic and distributed it through the email list. As an incentive, participants had the opportunity to enter a draw for a \$50 gift card upon completing the survey. The survey was open from 8 November until 26 November (2.5 weeks).

4.4 Targeted Focus Group Consultations

Population advisory committees

The process involved the incorporation of consultations into existing population advisory committee meetings. Members were notified of the consultation in advance via emailed agendas, and ahead of the consultations, participants received a framework to review. In the session a presentation on the policy was provided to provide context and encourage active engagement. To capture input and discussions, minutes were taken during the consultation sessions. The targeted focus group consultations spanned from September 28 to November 27, providing a structured timeframe for engagement. The population advisory committees consulted were:

- Inclusive Banyule Advisory Committee
- Age-Friendly City Committee
- Disability and Inclusion Committee
- Multicultural Committee
- LGBTIQ+ Committee (Written update only provided)
- Reconciliation Action Plan Advisory Committee (Written update only provided)

Community workshop

The community workshop took place on November 15 from 1:30 pm to 3:00 pm. The workshop featured a presentation from Gamblers Help, providing insights into gambling in Banyule, and a presentation from a lived experience practitioner. The session included small group activities that explored participants' feelings and opinions on gambling in Banyule, and facilitated a platform for gathering feedback on the draft Policy.

4.5 Targeted RSL Engagement

RSLs were specifically approached to invite comment on the draft policy position. Initial contact with all RSLs occurred on October 16, extending invitations to participate in the consultation, and meet with Council officers. Reminder emails were sent on October 20 and November 9. Throughout the process, individual RSLs were also contacted via phone calls to actively involve them and obtain feedback over the phone. Subsequent to these communications, meetings transpired between Council officers and Montmorency RSL on November 2, as well as with Council officers and RSL on Bell on November 15. Further, meetings with senior Council officers and Councillors were organized for Greensborough RSL on December 13 and Watsonia RSL on December 15.

5.0 Participation

Overall, the number of engagements made through this community consultation process totalled 191.

Session	Number of participants
Child Youth Family meeting	10
Age Friendly Committee	7
Multicultural Committee	11
Disability and Inclusion Committee	12
Inclusive Banyule Committee	10
Community Workshop	2
Shaping Banyule Survey	58
Intercept Survey	46
Youth survey	9
RSL on Bell	2
Senior's meeting	4
Montmorency RSL	3
Watsonia RSL	3
Greensborough RSL	3
Diamond Valley Greek Seniors Citizens	10
Submissions (Alliance for Gambling Reform)	1
TOTAL	191

5.1 Shaping Banyule Survey

A total of 58 contributions were made via the Shaping Banyule Survey.

The survey collected participant demographic data relating to gender and age. Of the 58 respondents, 31 (53.5%) were women, 21 (36.2%) were men, one (1.7%) were non-binary or gender fluid, and five (8.6%) did not disclose their gender. The top three age brackets of participants were 50-59 ($n=16$ or 27.6%), 35-49 ($n=14$ or 24.1%), and 60-69 ($n=12$ or 20.7%) years old. Other age groups represented were people aged 70-84 ($n=9$ or 15.5%), 18-24 ($n=1$ or 1.7%), 25-34 ($n=5$ or 8.2%).

Survey participants were also asked to indicate whether they have a disability (inclusive of a mental illness), identify as LGBTQIA+, are an Aboriginal and/or Torres Strait Islander person, a person who speaks English as a second or other language, and whether they are a carer. Of the 58 participants:

- Thirty-six (62.1%) did not identify as any of the above
- Twelve (20.7%) identified as a person with a disability, inclusive of a mental illness
- Four (6.9%) identified as LGBTQIA+
- Six (10.3%) were carers
- Five (8.5%) did not want to disclose this information
- None identified as being an Aboriginal and/or Torres Strait Islander person, or as speaking English as a second or other language

Survey participants were also asked to indicate their relationship to Banyule. Of the 58 respondents, 48 (82.7%) said they lived in Banyule, 18 (31.0%) said they worked in Banyule and 8 (13.8%) responded 'other'. None said they studied in Banyule. They were also asked about which suburb they lived in. The top three responses were:

Greensborough (n= 7, 12.0%), Eaglemont (n= 6, 10.34%), and Watsonia and Ivanhoe (both received n= 5, 8.6%). One or more responses were received for all other suburbs except for Yallambie and St.Helena.

5.2 Community Pop-Up Consultations

A total of 46 contributions were made through the specialised intercept survey through the Shaping Banyule platform. Survey participants were also asked to indicate which suburb they lived in. The top three responses were: Heidelberg (n= 9, 19.5%), Watsonia (n= 5, 10.9%), and Eltham and Ivanhoe (both received n= 4, 8.7%). One or more responses were received for all other suburbs except for Bellfield, Eltham North, Ivanhoe East, Lower Plenty, Yallambie, St.Helena, and Watsonia North. The 'Other' response received 11 responses (23.9%).

5.3 Targeted Youth Survey

A total of 9 contributions were made through the survey that was emailed out to the specialised youth email list. Of the responses received, four (4) identified as male, two as female and two as non-binary/gender fluid. Five were aged 12 – 17 years, and three were aged 18 – 24 years. One did not respond to the age question.

5.4 Targeted Focus Group Consultations

Population advisory committees and groups

Advisory committees from key population groups were engaged in targeted consultation to provide comment, feedback and lived experience/expertise on the Framework, its focus areas, and the focus area commitments:

- Child, Youth and Family meeting – 20 September
- Disability and Inclusion Committee – 25 October
- Multicultural Committee – 18 October 2023
- Age Friendly Committee – 28 September 2023
- Inclusive Banyule Committee – 8 November 2023
- Seniors Network meeting – 27 November 2023
- Diamond Valley Greek Senior Citizens meeting – 2 November 2023

Surveys and information related to the Framework were disseminated via the following Committees:

- LGBTIQ+ Committee
- Reconciliation Action Plan

Committee members are community representatives with lived experience and expertise relevant to their cohort and includes membership from community organisation representatives who work closely with the target population. Each committee is made up of 12 to 15 members.

Community workshop

A total of two community members attended the community workshop.

5.5 Targeted RSL Engagement

All four RSLs met with Council officers, or with senior Council officers and councillors to discuss the draft policy and provide feedback in four separate meetings.

5.6 Other

One written submission was received from the Alliance for Gambling (AGR) Reform.

6.0 Feedback

Overall, consultation participants responded positively to the Policy. There was broad support for the focus areas identified within the Policy (Operational responsibility, Advocacy, Planning and Health Promotion and Community Support), as well as the priority commitments identified within each focus area. Shaping Banyule Survey participants predominantly commented on the health promotion and community support ($n= 38$ or 69.1%), operational responsibility ($n= 29$ or 52.73%), and advocacy ($n= 24$ or 43.6%). Planning was the least commented on ($n= 13$ or 23.6%).

Consultations highlighted that overall, community members were supportive of the proposed policy and were overall concerned about gambling in the Banyule community. Specifically, they wanted Council to do what we can to limit Electronic Gaming Machine (EGM) access, and they wanted to see more regulation around gambling generally. They were also concerned about online gambling. They wanted to see more activities available for people to connect socially that didn't take place at a venue with EGMs, and they also wanted to see more support for RSLs and sports clubs to move away from gambling.

This section provides a summary of the feedback relating to each of the focus areas, their commitments, and community ideas for action, as well as areas of specific importance for older people, young people, our multicultural community, and people of different genders.

6.1 Opinion of gambling

In the Shaping Banyule survey, respondents were asked to complete the following sentence: 'Gambling in the community is...'. The below word cloud represents the responses received, with the most frequently used words showing as larger text:



The word cloud shows the overall community feedback on gambling in the community focused on the negative impacts associated with gambling, including that gambling is 'harmful', a 'problem' and 'dangerous'. It also reflects the community concern about the impact that gambling can have on people, the community, and families. Of the qualitative comments received that related to people's opinion of gambling in all aspects of the

consultation, 118 were categorised as negative. Overall themes that people raised that were categorised as negative were:

- Gambling is exploitative, harms those who can least afford it, is anti-social, and destroys lives, family and finances.
- Gambling is too readily available at RSL, hotels and online gambling. Specifically, the TAB in West Heidelberg was called out as being too prominent.
- Gambling being available in venues that also serve alcohol is problematic, since each can exacerbate the other.
- There was concern that gambling wasn't well regulated, that there are too many gambling advertisements, and that this is problematic for both children and older people.
- Community noted that gambling has links to increased risk of mental health, gender-based violence, housing, addiction and other social problems.
- Many community members called for gambling to be banned.
- Community noted that it is hard to avoid these venues that provides value meals, playgrounds, lots of space and social place to gather.
- Concern about the online gambling industry.

There was also feedback provided that was either neutral or positive, however this was much less (positive n=20, neutral n=18). Overall themes were as follows:

- Gambling can be an enjoyable, legal recreational activity if it's within limits in a controlled environment, and the person gambling is in control.
- Gambling funds RSLs to continue their service for reduced meals, buses, and room hire, and they also support some sports clubs.
- The perception that other addictions like vaping and smoking are more dangerous.
- Gambling is not within the remit of Council.

In the short intercept survey used in the pop-up consultation sessions, we asked 'Do you have any concerns about gambling in the Banyule community?'. 72% (n=33) said yes, 24% (n=11) said no and 4% (n=2) said they don't know. These quantitative results reflect and underscore the findings from the qualitative data and reflect a majority perspective that gambling is an area of concern for the community.

Interestingly, in the youth specific survey the findings were more split, though also had a much smaller sample size (n=9). We asked, 'Are you worried about gambling in the community?'. 45% (n=4) said yes, 45% (n=4) said no and 11% (n=1) said maybe. It is difficult to draw conclusions from this small sample size, but these youth specific results indicate that in this sample group, there may be less concern about gambling among young people.

6.2 Ideas for Council

Operational responsibility

About half of the survey participants chose to comment on operational responsibility (n= 29 or 52.73%). When asked 'How important are the Operational Responsibility commitments to you', the average response was 7.68 (n=22) where '0' was not important and '10' was most important.

When asked, 'Is there anything missing from these Operational Responsibility commitments?', respondents had the following suggestions:

- Aim to ban or limit advertising or visibility of gambling.
- Support any venues with EGMs on Council owned or managed land to transition to remove EGMs.

- Take an evidence-based approach to identify who is disproportionately impacted by gambling and support them.
- Council should partner with the Alliance for Gambling Reform (AGR), Victorian Gambling and Casino and Control Commission (VGCCC), and other state organizations.
- Council funds should not go to sports clubs or venues that support or offer gambling.
- Council should not receive revenue, grants or in-kind benefits from venues that offer gambling.
- Council should encourage traders associations to avoid hosting their events at venues with gambling.
- No feedback – the commitments are well considered.

Advocacy

Just over 40% of survey participants chose to comment on advocacy ($n=24$ or 43.6%). When asked 'How important are the Advocacy commitments to you', the average response was 9.00 ($n=17$) where '0' was not important and '10' was most important.

When asked, 'Is there anything missing from these Advocacy commitments?', respondents had the following suggestions:

- Advocate to remove or limit EGMs, and ban or limit gambling advertising.
- Advocate for greater regulation on EGMs, sports betting and online gambling. This includes higher taxes for venues who have EGMs.
- Advocate for support for sports clubs and RSLs to divest from gambling affiliated sponsorship or EGMs operation.
- Suggestions that members of the community could assist advocacy efforts by Council.
- The value of membership with the Alliance for Gambling Reform was raised by a small number ($n=2$)

Planning

Planning was the least commented on topic, with just over 20% of respondents choosing this category ($n=13$ or 23.6%). When asked 'How important are the Planning commitments to you', the average response was 8.78 ($n=9$) where '0' was not important and '10' was most important.

When asked, 'Is there anything missing from these Planning commitments?', respondents had the following suggestions:

- The most common suggestions centered around limiting licenses for EGMs, limiting venues with EGMs and reducing the opening hours for EGMs.
- Respondents noted that in nearly all cases the State Government have final authority over EGM applications and opening hours.
- There were some calls for higher costs to be applied to EGMs applications and permits.
- Some respondents noted that RSL's have longer parking times compared to other shops in the vicinity, which could contribute to longer gambling hours.

Health promotion and Community support

Health promotion and community support was the most popular choice for survey participants, with nearly 70% choosing to comment on this topic ($n=38$ or 69.1%). When asked 'How important are the health promotion and community support commitments to you', the average response was 8.64 ($n=28$) where '0' was not important and '10' was most important.

When asked, 'Is there anything missing from these health promotion and community support commitments?', respondents had the following suggestions:

- The most common suggestions centered around supporting people at-risk of gambling harm in the community, and offering alternative activities and venues that don't have gambling connected.
- Onsite venue assistants to be more aware and active around the warning signs of gambling harm.
- More education and awareness of gambling harm support services for the community, including in schools, sports clubs and on social media.
- Work with local organisations to encourage them to choose community venues to hire that don't have gambling onsite or associated with it.
- Partner with Banyule Community Health and VGCCC.
- Support RSLs to transition away from EGM operations.
- Suggestions around reducing or removing EGMs and gambling advertising from sport environments.
- Research into what drives gambling and causes the most gambling harm.

6.3 Opinion of draft Gambling Policy

In the Shaping Banyule survey, respondents were asked 'Do you support the draft Gambling Policy 2024–2028?'. Most respondents supported the policy, with 72% (n=42) saying they supported the policy. 14% (n=8) said they supported the policy 'somewhat', and another 14% (n=8) said they did not support the policy.

Of the qualitative comments received that related to people's feedback on the draft gambling policy, the majority were positive, with some that were negative. Overall themes that people raised that were categorised as positive were:

- Overall positive sentiments in relation to the policy, focus areas and commitments.
- Good to see recognition of the need for all levels of government to actively address problems associated with gambling.
- There is a need for more emphasis on removing EGMs through incentives.
- Taking a public health approach is key when aiming to reduce community harm from gambling.

Of the feedback provided that was negative, the overall themes were as follows:

- Requests for even stronger response to gambling harm in the community.
- Acknowledgement that much of the gambling sector is outside of Council's control and questioning the use of Council resources in this space.
- Request for more research and evidence.

6.4 Experiences or needs of identity groups

Young people

Young people were often raised as a population group of concern in the consultation, especially in relation to online gambling or gaming. The youth survey was targeted at young people aged 12 – 25 years old. As previously mentioned in this report, in the Youth specific survey which had 9 respondents, 45% (n=4) said they were worried about gambling, 45% (n=4) said they weren't worried and 11% (n=1) said maybe. In addition, respondents were also asked 'Do you, your friends, or your family use online betting apps or websites?'. 45% (n=4) said yes, 45% (n=4) said no and 11% (n=1) said don't know.

These results reflect the diversity in opinion and experience in the young people that responded to the survey, and the qualitative responses to the survey provide further context. The main themes are summarised below:

- Gambling was seen as addictive and linked to negative impacts like financial issues and family conflict and violence.
- Respondents noted that gambling may be normalised for some young people.
- Online platforms are built to be addictive and engage people into playing for longer.

- Gambling advertising was called out as part of the problem.
- When young people gamble online, they do it on their phone or computer, and some reported doing it through games that use fictional currency.
- When young people gamble in person, they reported using EGMs or TAB.

Older people

Older people were also raised as a population group of concern in the consultation, especially in relation to EGM use and the relationship of EGM to all RSLs in Banyule. The main themes from consultation with older people specifically are summarised below:

- The connection between gambling and social isolation, and how people seek community connection through gambling venues.
- Gambling venues (especially RSLs) offer spaces for community groups to hire and are an important connection point in the community. It would be ideal if gambling wasn't part of these spaces.
- There is a need for alternatives to gambling, like organised outings and non-gambling social activities.

Multi-cultural community

The consultation session held at the Multicultural Advisory Committee Meeting elicited important conversations relevant to Banyule's Multicultural committee. The main themes are summarized below:

- There is culture of gambling within some aspects of the Chinese community, for example when playing Mahjong.
- Ideas of what motivates people's engagement in gambling, including limited social life, boredom, accessibility, and the perception of easy money.
- Identified online gambling as a major issue within the community, emphasising its accessibility and the ability to bet on anything.
- There are negative impacts of gambling on new migrants and vulnerable members of the community.

6.5 Gender and gambling

Council has a requirement under Victoria's *Gender Equality Act 2020* to complete gender impact assessments (GIAs) of new and reviewed policies. In line with this requirement, Shaping Banyule Survey participants were also asked the following three questions relating to gambling and gender:

- What are some ways that Council can involve women and gender diverse people in planning and decision-making in relation to gambling and gambling harm?
- What are the specific needs of women and gender diverse people in relation to gambling and gambling harm?
- What actions can Council take to ensure that women and gender diverse people benefit from our work to prevent gambling-related harm?

Suggestions to involve women and gender diverse people in planning and decision-making included:

- Offering community engagement and support by engaging with a diverse range of people through social media, advertising, and on-site engagement.
- In planning and decision making, address the intersection of gambling with gendered violence and recognise diverse and intersectional impacts among Banyule households.
- Listen to and consult with people and groups who have lived experience.
- Use research and evidence that relates to the impact of gambling on various gender identities to inform planning and decision making.

Regarding women and gender diverse people's specific needs and concerns, suggestions made by respondents included:

- More research into why some genders do gamble or don't gamble and addressing any gendered stereotypes with evidence.
- Understanding how venues can offer respite from family violence situations and isolation, and what other alternatives are available.
- Understanding the impact of the gender pay gap on gambling harm.
- Investigating gambling advertising and its targeting of men as the main population group.

Finally, participants identified the following actions that Council can take to ensure that women and gender diverse people benefit from work to prevent gambling related harm:

- Advocate and implement measures to ensure we can work towards a reduction in EGMs in low socio-economic areas, and advocate to reduce the prevalence of gambling advertising.
- Work more closely with gambling venues to create environments where gambling harm is less likely to occur.
- Establish a safe out-of-hours space for women and gender diverse people.
- Monitor to assess the impact of gambling harm prevention measures taken and aim to undertake Gender Impact Assessments on all programs.

6.6 RSL specific feedback

Similar themes emerged from the RSL specific consultation sessions that we held. A summary of the major themes is as follows:

- All RSLs we spoke with wanted to reiterate their positive impact on the community and the important work they do to support veterans and their families.
- Though all RSLs in Banyule have EGMs in their venues, they wanted to ensure they are differentiated from the 'for-profit' venues that have EGMs, as they feel they have a different focus and impact in the community.
- Some RSLs spoke about the challenge of being able to fund the important services they provide, and that EGMs provide a much-needed funding stream for them. While some RSLs may ideally want to operate without EGMs, they have assessed that they cannot afford to.
- Another issue raised by some RSLs was the challenge of the long leases that the EGMs bring, between 10 – 20 years. This means that even if an RSL wanted to remove EGMs, they wouldn't be able to do this until their lease was up.

7.0 Proposed changes to the Gambling Policy

Based on the consultation findings, several changes to the Banyule Gambling Policy are proposed, including a change to the title of the policy, edits to the names of the priority areas and the addition of some more commitments under selected priority areas.

Proposed changes to framework priority areas

Priority area	Proposed changes
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Operational responsibility	<ul style="list-style-type: none"> • Change the language of the title of this section to something more accessible. Suggestions include 'Local Council tools and powers' or 'Direct interventions'. • Edit the commitment: 'Continue the ban on any form of advertising for gambling on Council owned and operated facilities' to provide more clarity and detail on the intent of the commitment, which is to ensure that Council reduces the direct advertising of gambling on our facilities. • In future Gambling Policies, understand the implications of adding in a commitment that details possible future supported transition plans to remove EGMs from any Council owned or managed land. • Add in the following commitment: Offer support to community-based organisations who want to reduce their reliance on gambling based income streams. • Include a commitment around the annual monitoring of EGM data to assist in the implementation of policy, and to track local emerging trends.
Advocacy	<ul style="list-style-type: none"> • Reiterate the importance of the AGR reform membership as the platform for how we will deliver and advocate for most of our Advocacy commitments.
Planning	<ul style="list-style-type: none"> • Add in a commitment that details that we will require a social and economic impact assessment on permit applications received for any new or existing EGMs, using terminology from Banyule's Gambling Policy 2018-2022.
Health promotion and community support	<ul style="list-style-type: none"> • Consider changing the language of this priority area to something more accessible – for example 'Community wellbeing'. • Add in a commitment that details our approach to investigating alternative social spaces for the community to use, that do not incorporate gambling.

Other proposed changes

- Change the policy title to reflect the purpose of the policy more accurately, and ensure the focus is clear. In addition to this, ensure the policy reflects the shift scope and language from "individual responsibility" to "harm prevention" and "harm minimisation", shifting the focus to the regulation of systems as a public health issue rather than regulation of individual behavior. An alternative option could be: 'Gambling harm prevention policy'.
- Change the terminology in the Guiding Principle 'Uplifting protective factors in our community' to 'Uplifting ways to stay safe and healthy in our community'. This is more accessible.
- Include a section in the Policy that defines the different kinds of gambling, including EGMs, online gambling, and sports betting and TAB.
- Incorporate a statement into the appendix of the policy that recognises the important community support work that RSLs undertake, while also highlighting the factual local statistics of EGM losses.
- Some suggestions raised in the consultation process are more operational in nature, and thus are more appropriate for inclusion in the yet to be developed action plan, which will articulate the actions Council will undertake to implement the Policy. These suggestions are summarised below, and will be considered in the development of the action plan:
 - Build a partnership with the VGCCC, and investigate what local support they can offer, including training and education.

- Investigate the availability of extended parking options near venues with EGMs, and compare this to other similar venues without EGMs.
- Provide more detail on the AGR membership, what it will entail and how they will support Council to achieve our advocacy commitments.
- Research alternative business models for venues that rely on gambling for their revenue and build relationships with these venues (RSLs) to better understand how we can support them.
- Collaborate with Council's Planning team to understand the existing procedures for EGM permit applications, and any amendments linked to venues hosting EGMs. The aim will be document and integrate a uniform process for conducting social and economic impact assessments on all applications or amendments pertaining to venues with EGMs.
- Support the review of Banyule's grants and awards program to protect council funds from being used in conjunction with gambling activities through collaboration with the relevant internal team.
- Investigate local sports context and better understand the local relationship between gambling and sports clubs (if any).