CITY OF MONASH

# Public Health Approach to Gambling Harm Policy

2026

# DRAFT Public Health Approach to Gambling Harm Policy

## PURPOSE

This policy outlines Council's commitment to reducing harm from gambling within the City of Monash and guides Council in its decision making on gambling harm prevention.

The City of Monash has a longstanding commitment to, and leadership role in, the prevention of harm from gambling. This policy presents a formal review to the 'Public Health Approach to Gambling Harm Policy' through which the City of Monash elevated gambling harm to a priority public health issue. The role of a Council is to provide good governance for the benefit and wellbeing of their community. Councils are legislated to develop a Municipal Health and Wellbeing Plan every four years that responds to the local community's health and wellbeing needs. Harm from gambling is a significant concern within Monash and is listed as a priority area within Council's Health & Wellbeing Plan.

The policy seeks to strengthen Council's ongoing commitment to the reduction of gambling-related harm and to maintain Monash's role as a leader and change agent on this public health issue within the local government sector. As the closest level of government to the community, Council is best placed to understand the effects of gambling and to limit the negative impacts of gambling on our community.

## GAMBLING HARM

The harms from gambling in all its forms are not limited to financial. Harm also includes effects on physical and mental health, emotional wellbeing and personal relationships[i]. Gambling harm has been defined as 'any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrease to the health or well-being of an individual, family unit, community or population'[ii].

In the 2024/2025 financial year $126,045,998.69 was taken by EGMs at venues within Monash[iii]. Monash ranked 8th highest in LGAs in Victoria, and highest for the Eastern Metropolitan Region.

The Social Cost of Gambling Report estimates $14.1 billion in costs associated with gambling including financial impacts, mental health, family breakdown, productivity loss, costs to government, crime including corrections and court and police[iv].

Monash City Council recognises gambling as a public health issue that impacts not just individuals but entire families and communities. The public health approach recognises that it is a complex interplay of social, economic and environmental factors that contribute to people's health and potential harm from gambling[v]. By applying this lens to gambling, council can take a coordinated, comprehensive approach that works to prevent gambling harm for the whole population, not just individuals experiencing significant harm [vi]. We recognise that Council's actions play an important role in the approach, but that addressing gambling harm requires collaboration among multiple stakeholders including individuals, community groups, businesses and all levels of government. [v].

## SCOPE OF POLICY

It is Council's role to seek to improve and promote public health and wellbeing within our municipality. Gambling has been categorised as a legal form of recreation, however, as the closest level of government to community, Council sees the significant impact the harm gambling causes within the community. Council's concern with gambling harm is particularly for those most vulnerable in our community who can least afford to carry the burden of gambling losses. We are concerned about the significant health, social and economic impacts that harmful levels of gambling can have on individuals, families and communities.

EGMs remain among the most impactful form of gambling to the local community regarding harm inflicted, as well as the area where local government authorities have the most influence. Whilst EGMs remain a primary focus, the scope of this policy focuses on all forms of gambling that can cause harm to the community including (but not limited to):

- Electronic Gaming Machines (EGMs)
- Sports betting
- Community fundraisers that have gambling elements
- Commercial bingo
- Keno
- Horse/dog race wagering
- Casino games
- Online gambling

The policy will be relevant to make decisions relating to:

- Gaming venue and license applications
- Lease and licensing agreements
- Grant applications and funding
- Council-hosted events
- Community fundraisers that have gambling elements, held on council
- Use of Council-owned and managed buildings
- Advertising, signage
- Sponsorships that involve advertising, signage or public endorsement Research and monitoring trends
- Advocacy commitments
- Officer resourcing/time
- Health promotion partnerships, campaigns and events
- Other matters in which gambling harm can be reduced.

**Exclusions**

Council recognises that community run bingo nights and small-scale raffles can be conducted by sports clubs and community groups in efforts to create social environments or to fundraise for local charities / causes. Council is not looking to prohibit these activities, instead Council wishes to ensure that harm from these activities is minimised and Victorian Gambling and Casino Commission (VGCCC) regulations for community and charitable gambling are upheld.

This Policy is grounded in evidence and local data; please see Background & Context document for further information on the data that has informed the Policy.

The City of Monash acknowledges the severe impacts on individuals and communities that gambling can cause. If you or someone you know is being impacted by gambling, please reach out to the support available through Gamblers Help; gamblershelp.com.au or 1800 858 858. Gambling harm and family violence can often coexist, for support with family violence, call 1800RESPECT (1800 737 732).

## GUIDING PRINCIPLES

The following principles are the foundation on which Council's commitments to reducing harm from gambling are built upon.

**Research**
**What this means:** Council will ensure that gambling harm prevention policies and initiatives are informed by the best available data and evidence.
**What we will do:** Council will continue to source and maintain accurate data, information and research on all forms of gambling. Where possible Council will participate in and promote gambling harm prevention research to contribute to the evolving evidence base.

**Partnerships**
**What this means:** Gambling harm is a complex issue; Council acknowledges the importance of partnerships and collaboration and recognises that a diverse set of stakeholders is integral to addressing harm from gambling.
**What we will do:**
Council will continue to foster its long-standing partnerships with peak bodies such as the Alliance for Gambling Reform, VLGA and Gamblers Help and community groups and organisations in the progression of its public health approach to gambling.

**Language**
**What this means**: Council rejects 'responsible gambling' rhetoric, which seeks to shift the responsibility to the individual. This language deliberately conceals the predatory conduct of the gambling industry.
**What we will do:** Council will consciously use evidence based public health language acknowledging the role of the gambling industry in causing gambling harm in all Council communications.

**Gender Equity**
**What this means:** Gender and gender norms can impact on a person's experiences or risk of experiencing harm from gambling. There is an evidence-based link between family violence and harm from gambling.
**What we will do:** A Gender Impact Assessment has been conducted on this policy and Council will continue to assess the impact and effect that this Policy and Council's initiatives may have on people of different genders. We will ensure that Council programs, campaigns and advocacy that address gambling harm are designed considering the needs and experiences of people of different genders and are designed to benefit all.

**Intersectionality**
**What this means:** We recognise that people's lives are multi-dimensional and complex and that our response to gambling harm prevention cannot be developed through a singular lens.
**What we will do:** We will identify and reduce barriers to gambling harm prevention across our community by ensuring that information, communication, services and facilities are accessible, welcoming, safe and inclusive for all people in Monash.

## ROLE OF COUNCIL IN GAMBLING HARM PREVENTION

The role of Council in gambling harm prevention can be summarised into four categories:

**Plan & Regulate:** Council is involved as a Statutory Authority if a venue operator applies for a planning permit for new EGMs to be brought into the City of Monash area. Council must make a decision to either support or refuse a planning permit application based on the policies and a number of decision guidelines as set out in the Monash Planning Scheme. This includes but is not limited to whether there is evidence the new machines will negatively impact the community. Through its Leasing and Licensing Agreements, Council can regulate gambling activities on Council land.

**Advocate & Lead:** Many regulations on the gambling industry are set by State and Federal agencies. Council has a responsibility to act on the needs and concerns of our community and represent these views to the appropriate governing bodies. Council can lead by example by not taking direct contributions from the gambling industry, and we can continue to elevate gambling harm to the highest level of public prominence through strategic documents such as our Health & Wellbeing Plan.

**Fund & Resource:** Council can support social initiatives that do not involve gambling through our Monash Community Grants Program (MCGP) or through Council-run programs and events. Council provides community spaces including halls, meeting spaces and sporting pavilions, club rooms and reserves, often at significantly reduced costs for community groups and clubs. Through its Leasing and Licensing Policy, and the Active Monash Sports Club Framework and Lease Agreements, Council can ensure that Council buildings are free from gambling and gambling is not promoted or endorsed by tenants.

**Communicate & Build Capacity** We will keep the Monash community up to date with local gambling information such as losses, campaigns to reduce harm and any planning permits received for new EGMs. Council plays a pivotal role in building awareness and creating environments that empower communities to learn about and address gambling harms.

## PRIORITIES

**Plan & Regulate**

1.1 When assessing applications for new or transferred EGMs, Council will consider each case individually based on merits and having regard to the Gaming Policy provisions of the Monash Planning Scheme.

1.2 Council will oppose applications for new EGMs licences, increases in EGMs or transfer of EGMs when an application is seen to cause a net social or economic detriment to the local area.

1.3 Council will not support any application for EGMs on Council owned or managed land.
All planning decisions and advice relevant to gambling matters will be made with reference to this Policy Statement and the relevant provisions of the Monash Planning Scheme.

1.4 Council will actively discourage and oppose any increase in the number of EGMs, density of EGMs or numbers of gambling venues in any areas with high concentrations of people most at risk of harm from gambling.

1.5 Through lease, hire and licence agreements, Council will implement measures to prevent gambling activities on Council owned/managed land.

1.6 Gambling activity and sponsorships that involve the promotion or advertising of any gambling activity or venue on Council-owned or managed land or in Council facilities is prohibited. Failure by user groups or tenants to comply with this requirement or in breach of lease agreements will result in their use of the facility being jeopardised. This includes but is not limited to advertising or promotion within clubrooms, via newsletters, email banners or social media on club attire or paraphernalia on sports ground fencing or scoreboards. This pertains to all forms of gambling advertising, particularly sports betting, online gambling and EGM venues.

**Advocate & Lead**

2.1 Council will advocate for a sinking cap on the number of EGMs in Monash and a continuation of the regional cap (regional cap and municipal limits defined in Background & Context document).

2.2 Council will continue to elevate gambling to the highest level of public health prominence in Council strategic documents (including Lease & Licence Policy).

2.3 In partnership with peak bodies including the Alliance for Gambling Reform and VLGA, Council will continue to advocate for regulatory reform to reduce harmful practices in the gambling industry including but not limited to:

- The permanent reduction of gambling room operating hours, with all gambling rooms to be closed between midnight and 10am.
- The elimination of sports betting advertising, particularly during live viewing of sport and targeted online gambling advertising to young people.
- The reduction of the maximum bet on EGMs to $1 per spin.
- Reforms to the Community Benefit scheme, including a more transparent reporting processes and exclusion of sponsorships and operating costs as claimable community benefits.
- Changes to regulations concerning the design of EGMs to reduce characteristics designed to promote persistent machine use and addiction.
- Changes to EGM licensing requirements to strengthen protections for users against gambling harm.
- The recommendations to address harm from online gambling identified in the Murphy Report are implemented by the Australian Government.
- The carded gambling system for EGMs involves mandatory precommitment based on thorough evaluation and testing.

2.4 Council will apply a public health approach to harm prevention and focus on collaborative action with State Government, Alliance for Gambling Reform, VLGA, Gamblers Help, peak bodies, community partners and other councils to reduce and prevent gambling harm within Monash.

2.5 Council staff will not attend gambling venues when representing Council unless undertaking statutory functions or duties necessary as part of their role. Reasons to attend a gambling venue include meetings organised by a third party that have strategic ramifications for Council business. Officers need director approval to attend. Councillors, when representing the Council in a formal capacity, are discouraged from attending gambling venues however there may be circumstances where the Councillor determines the event warrants attendance and may exercise their discretion.

**Fund & Resource**

3.1 Council will resource, promote and seek external funding for a range of non-gambling social, cultural and recreational programs and events as an alternative to gambling in Monash including targeted strategies for those most at risk.

3.2 Council does not provide support (including use of its facilities), funding, publicity or promotion for community groups/organisations/sports clubs that promote, advertise or endorse gambling, particularly EGMs, gambling events/fundraisers on council owned/managed land, sports betting, and online gambling. Promotion of gambling organisations and activities includes on club/group websites, newsletters, social media or paraphernalia. All relevant Council policies and guidelines will align with this policy position. This excludes commemorative events such as ANZAC Day that are held by approved RSL clubs.

3.3 Through the Active Monash Sports Club Framework, Council will prioritise subsidised leases for organisations that have no affiliation with gambling or gambling organisations.

3.4 Council will not facilitate any gambling activity nor hold any community activity, event, program or social outing in venues that have EGMs or gambling activities.

3.5 All grants distributed by Council (including the Monash Community Grants Program and Discretionary Funds) will not fund activities or events that occur in venues that have EGMs or gambling activities**.**

3.6 Council will maintain independence from the gambling industry. Council will not accept direct financial contributions from the gambling industry and will not promote community grants or initiatives offered by local EGM venues**.**

3.7 Council will block and filter internet accounts across council provided equipment and internet (WiFi) to ensure computers are not being accessed for gambling activity by staff and community.

**Communicate and Build Capacity**

4.1 Council will provide public notice to the community when there is an application for new EGM licences, an increase in or transfer of EGMs, consult where feasible and publish copies of all gambling related submissions it makes on the Council website.

4.2 Council will work with sporting clubs and community groups to increase awareness of the risks of gambling harm and to reduce reliance on the gambling industry (including localised gambling activities)

4.3 Council will encourage alternative activities to gambling and provide support to increase community capacity to reduce harm from gambling through education and events.

4.4 Council facilities will be available for hire, subject to availability, as venues that do not promote gambling or gambling advertising.

4.5 Council will continue to raise awareness of the gambling harm occurring locally by communicating gambling losses, EGM numbers, gambling prevalence, current public health research and health and wellbeing impacts. Targeted and accessible communication will be a priority.

4.6 Council will provide and partner on opportunities for community and staff to learn about gambling issues, prevention and help seeking.

4.7 Council will promote Gambler's Help and family violence support services in all communications regarding gambling harm.

## IMPLEMENTATION AND REVIEW

This Policy Statement will inform and be applied to all relevant Council planning, policy, programs and decision-making. The Statement is to have whole-of-Council ownership.

Council will review this Policy Statement every two years or as necessary when evidence base or legislation changes.

[i] VRGF, 2016, Fact sheet 2: The seven dimensions of gambling harm, Assessing gambling-related harm in Victoria: a public health perspective https://responsiblegambling.vic.gov.au/documents/166/Harm-study-Fact-sheet-2-Seven-dimensions-of-gambling-harm.pdf

ii Langham et al., 2016, p4. Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms.

iii VCGRLGCCC website, Monthly LGA EGM Statistics, Monash. Victorian Commission for Gambling and Liquor Regulation: Monthly LGA EGM Statistics (vcglr.vic.gov.au)

iv Social costs of gambling to Victoria 2023 | Department of Justice and Community Safety Victoria

v VRGF 2015, Using a public health approach in the prevention of gambling-related harm, background paper. https://responsiblegambling.vic.gov.au/documents/21/using-a-public-health-approach-in-the-prevention-of-gambling-related-harm.pdf

vi Productivity Commission 2010, Gambling, Report no. 50, Canberra, page 149 'The public health model'. https://www.pc.gov.au/inquiries/completed/gambling-2010/report/gambling-report-volume1.pdf