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Committee Secretary
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Inquiry into online gambling and its impacts on those experiencing gambling harm

Relationships Australia welcomes the opportunity to make this submission to the Committee's inquiry into online gambling and its impacts on those experiencing gambling harm. This submission is made on behalf of the eight member organisations of the Relationships Australia Federation.

1. The work of Relationships Australia

We are an Australian federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances.

Relationships Australia provides a range of services, including counselling, dispute resolution, children's services, services for victims and perpetrators of family violence, and relationship and professional education. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others.

The core of our work is relationships – through our programs we work with people to enhance and improve relationships in the family, whether or not the family is together, with friends and colleagues, and within communities. Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people, in all their diversity, to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. These rights permeate all of our work.

Relationships Australia is committed to:

- Working in rural and remote areas, recognising that there are fewer resources available to people in these areas, and that they live with pressures, complexities and uncertainties not experienced by those living in cities and regional centres.
- Collaboration. We work collectively with local and peak body organisations to deliver a spectrum of prevention, early and tertiary intervention programs with older people, men, women, young people and children. We recognise that often a complex suite of supports (for example, drug and alcohol services, family support programs, mental health services, gambling services, and public housing) is needed by people affected by family violence and other complexities in relationships.
- Enriching family relationships, including providing support to parents, and encouraging good and respectful communication.
- Ensuring that social and financial disadvantage is not a barrier to accessing services.
- Contributing its practice evidence and skills to research projects, to the development of public policy and to the provision of effective supports to families.

Members of the Relationships Australia Federation have been providing Gambling Help Services (GHS), for approximately 30 years (including Relationships Australia South Australia (RASA), Relationships Australia QLD (RAQ)) and Relationships Australia Canberra & Region (RACR) delivers the ACT Gambling Support Service.

GHS provides counselling, education and financial counselling services to people experiencing gambling related harm. Relationships Australia works closely with those impacted by gambling-related harm as well as their families. The stories and voices of our clients are represented in this submission, together with reflections and recommendations based on our practice experience.

2. Mitigating the harms of online gambling - Recommendations

The views expressed in this submission support the following recommendations.

1. That government provide funding for research on online gambling to ensure a more nuanced understanding of the nature of online gambling and its prevalence, a clear definition of when it is a problem behaviour, and evidence about effective interventions.
2. That counselling and support services receive ongoing and secure resourcing that meets the increased cost of delivering services, and is sufficient to meet the growing demand to support communities impacted by online gambling.
3. That guidelines for responsible online gambling be developed in collaboration with people with lived experience.
4. That government fund an awareness and education campaign that targets those at risk of experiencing the harms associated with online gambling. This campaign should explore both the risks associated with online gambling, promote tips for “safer gambling” and refer those who need it to the help that is available.
5. That advertising of online gambling products during sports events as well as at sporting and related venues, be prohibited.
6. That regulation be targeted at requiring providers to lower ‘barriers to exit’ from online gambling, ensuring that gamblers who wish to extricate themselves from online gambling can do so easily and swiftly.
7. That advertising of online gambling on social media, as well as television and radio advertising and via sponsorship arrangements, be restricted, in order to minimise its exposure to children and young people.

3. The effectiveness of existing consumer protections aimed at reducing online gambling harm

Online gambling as a public health issue

Online gambling is largely synonymous with internet, remote, and interactive gambling. It refers to the range of gambling activities offered through interactive technology, including computers, mobile and smart phones, tablets, and digital televisions. While this mode of technologically supported gambling shares most hallmarks of other gambling activities, differences arise from gambling in person at land-based retail outlets and venues and placing wagers over the telephone, mainly in terms of unbridled accessibility (Gainsbury, 2015b) and the shield of anonymity, with its disinhibiting effects.

Problem gambling is defined as ‘difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community’ (Neal, Delfabbro, & O’Neil, 2005). In this sense, problem gambling is a significant public health issue in Australia that not only affects people with a gambling problem, but also their families, the community and governments. A number of studies have found

greater levels of problem gambling severity among online, compared to offline, gamblers (Gainsbury, Russell, Wood, Hing, & Blaszczynski, 2014; Griffiths *et al.*, 2009; Wood & Williams, 2011). In 2011, the problem gambling rate among online gamblers was three times higher than for offline gamblers (Gainsbury, Russell, Hing *et al.*, 2014).

Notably, it is difficult to determine when online gambling becomes problematic. Existing studies fail to define characteristics (e.g. personal or behavioural) of online and offline problem gamblers (Gainsbury, 2015b). While there is some evidence that online and offline problem gamblers do represent somewhat different cohorts, the heterogeneity in each group makes it difficult to distinguish. This represents an under-researched area suggesting that longitudinal studies to clarify variables/mechanisms of action would be of benefit.

Prevalence

Online gambling is growing rapidly in terms of popularity, market share and products offered, and was predicted to account for 9% of the total global gambling market between 2015 and 2017 (Global Betting and Gaming Consultants [GBGC], 2014). Globally, wagering is the most popular online gambling product, accounting for 53% of the market, followed by casino games (25%), poker (14%), and bingo (7%) (H2 Capital, 2013). Australia is estimated to account for 5% of the global online gambling market (Gainsbury, 2012). The rate of Australians gambling online has increased from under 1% in 1998-99 to 8% in 2011 (Gainsbury, Russell, Hing, Wood, Lubman *et al.*, 2013). In 2022, the Australian Communications and Media Authority (ACMA) found that more than on in 10 Australians reported participating in online gambling at some stage in the previous 6 months (ACMA, 2022).

Contemporary online gambling

Online gambling has become ubiquitous, and so too have the means in which it is aggressively marketed. Young people and other vulnerable populations are at particular risk, as they are increasingly exposed to messages from a broad range of media that endorse, promote, incentivise and normalise online gambling.

We know that there are many impacts common to online and offline gambling but, in our experience, online gambling appears to increase the scope and intensity of problems for gamblers, and their families. What is most evident is the pervasive and relentless nature of online gambling opportunities, which can virtually imprison them, making it more difficult to overcome than other forms of gambling.

The Australian Institute of Family Studies (AIFS) and Australian Institute of Criminology (AIC) both undertook research about how Australians gambled during 2020, amid the constraints imposed in the public health responses to COVID-19 (AIFS, 2020; AIC, 2020). AIFS noted that 'one in three participants signed up for new betting accounts' and that online betting accounted for 78% of participants' betting, up from 62% before COVID-19.

Profile of clients who gamble online – Snapshot provided by Relationships Australia South Australia

At Relationships Australia South Australia, individuals who primarily gamble online currently represent a small, but growing cohort among those seeking help. The number of clients in the Gambling Help Service, who identify online gambling as their preferred method of gambling, has almost doubled, from 5% of clients in FY2012, to 8.5% in FY2022 (RASA, 2022). Analysis of demographics reveals that many of these clients are male and that almost half (49%) were aged 30-45 years (RASA, 2022).

The effectiveness of existing regulation

The regulation of online gambling through an ordinary consumer/provider conceptualisation is inherently flawed due to asymmetries of information and power. Gambling-related harm almost always includes a complex mix of health, financial, relationships and social issues that span family violence, substance misuse and homelessness. Addictive behaviours, on which gambling thrives, are not easily countered without comprehensive understanding of the triggers and symptoms that drive them.

The evidence base to underpin comprehensive policy development is currently clearly lacking. At present, there is no agreed level of participation at which online gambling is considered harmful or problematic. The level at which one person might experience online gambling as a fun leisure activity may for another person result in significant harm. Relatedly, there is a lack of evidence base around which interventions are effective in preventing and minimising online gambling-related harm. This highlights the necessity of undertaking more research in this area. Importantly, the absence of evidence does not negate the need for action. Rather, it necessitates reasonable inference and adaptive learning, for instance, from public health strategies in relation to other unhealthy commodities such as tobacco and alcohol, and the corresponding actions that have achieved change.

Recommendation

For the reasons in this section, Relationships Australia makes Recommendation 1, above.

4. How to better target programs to address online gambling harm to reduce the potential exploitation of at-risk people, and protect individuals, families and communities

In the context of public health, prevention is defined as action to reduce or eliminate onset, causes, complications or recurrence of disease (National Public Health Partnership, 2006). In the case of online gambling, harm minimisation and consumer protection efforts will only be truly effective if they take a holistic preventative approach, based on the public health model. In this instance, prevention refers to actions that prevent or delay the onset of online gambling harm and minimise the risks and harms associated with online problem gambling.

Relationships Australia considers that for programs to effectively address online gambling harm, a combination of primary, secondary and tertiary prevention measures must be considered.

Primary prevention

Primary prevention strategies aim to prevent harm before it occurs. The focus is on preventing movement to the 'at risk' group. Primary prevention action targets the community as a whole; that is, all gamblers and non-gamblers, through the utilisation of universal approaches. It is also directed at specific sub-population groups that possess characteristics known to place them at increased risk of gambling-related harm, such as young people. Key settings include the local community, sporting clubs, schools, workplaces.

Secondary prevention

Secondary prevention aims to reduce online gambling-related harm in the early stages, through early identification of at-risk online gamblers. The focus is on preventing progression to online problem gambling and escalation to severe online gambling-related harm. Secondary prevention targets groups where risk of harm is high, such as people who play regularly on online gambling. Key settings include online gambling websites.

Tertiary prevention

Tertiary prevention strategies aim to minimise the impact of online gambling-related harm through increasing access and availability of treatment, services and support. The focus here is on addressing online gambling-related harm and preventing relapse. Tertiary prevention targets people experiencing harm from online gambling; that is, people experiencing multiple serious online gambling-related harms as a result of their own online gambling or the online gambling of another. Measures canvassed in this submission, such as well-publicised, transparent pathways to empower problem gamblers to exit online gambling (especially using credit), are vital to mitigate risks of isolation and hardship that can arise from problem gambling.

Client voice:

“I can’t turn it off. Its (sic) on my phone. Its (sic) in my face all the time”

Problem gambling often exists at the intersection of a range of mental ill-health and related factors such as depression, anxiety and substance abuse (Monash University, 2011), and loneliness (Raylu & Oei, 2007).

Our experience of providing gambling help services is that gambling, for some individuals, becomes a substantial barrier preventing them from initiating and nurturing connection with family, friends and the broader community. Those individuals can, without noticing, become increasingly isolated, losing the protective factors that social connection provides, and leaving them vulnerable to a range of harms to physical and mental.

Social connection has been studied extensively, both in Australia and overseas, with authors now firmly agreeing about the importance of social connection in shaping wellbeing across the life span, particularly in later life (Baumeister & Learly, 1995).

It is therefore not surprising that deficits in experiences and feelings of belonging have been associated with a range of poor mental, physical and socio-economic outcomes for people, their families and communities. In a recent meta-analytical review of literature, it was found that people who are socially isolated or lonely are at risk of premature mortality at rates comparable with other well-established risk factors, including lack of physical activity, obesity, substance abuse, poor mental health, injury and violence (Holt-Lunstad, 2015). The research literature also identifies relationships between loneliness and poor mental health, including depression (Rubin & Mills, 1998; Nangle *et al.*, 2003, Wang *et al.*, 2018, McDonald, 2018), lower levels of self-worth (Qualter & Munn, 2002), life satisfaction (Goodwin, Cook, & Yung, 2001) and subjective wellbeing (Chipuer, Bramston & Pretty, 2003).

In studies of young people, social isolation and loneliness have consistently been associated with poor health outcomes. Pressman and colleagues (2005), for example, found small social networks were independently associated with poor immune response, while adolescents who do not have close friendships and good social networks consistently report lower levels of self-esteem, more psychological symptoms of maladjustment, and are at higher risk of suicide (Kidd, 2004). For older cohorts, loneliness has been found to be a predictor of functional decline and premature death (Perissinotto, 2012), with a lack of social connection carrying health risks equivalent to other known risky behaviours such as smoking 15 cigarettes a day (Valtorta, 2016b).

Client story: “He couldn’t spend time with his kids”

Our client was an ex-athlete of some note and constantly watched games on TV. When watching the AFL, he placed bets on things such as who would kick the first goal and who might place the next tackle or how many disposals a particular player may get. Upon losing, he became angry and aggressive. He sought help and stopped watching sports on television in order to avoid gambling triggers. This meant that, in support

of the gambler and his recovery, his partner and children were no longer able to watch sports at home, either. The problem was so overwhelming for the client that going to his children's sports events prompted urges to gamble that ultimately led him to abstain from attending. Online gambling essentially posed restrictions on family choices and activities, and ultimately limited the degree to which the client was able to share his children's lives.

Client story: It consumed him, and he felt like he had no future

Our client noticed that his attention to work and other domains of his life had decreased, while his time thinking or accessing online gambling had become a preoccupation - bordering on obsession – that was literally at his fingertips. While initially his interest lay with specific games or teams, he soon found himself betting online at any opportunity: while on a work break, in between driving to appointments, and at the end of the day to seek relief if it had been particularly slow or there had been tensions. The impact of his increased gambling activity manifested in his finances where he, despite working hard, was left with no savings at all. On further reflection, the client realised that online gambling had become all-consuming, and prevented him from spending time with friends whose company he once enjoyed and valued. It also meant less opportunity to invest his money in activities and future planning. He found this most upsetting, and started to think and feel that he 'had no future'.

Gambling and intimate partner violence

Recent Australian research has found, *inter alia*, that:

- gambling does not directly cause intimate partner violence, but can intersect with it in a range of different ways, including by exacerbating existing violence
- the community lacks awareness about the impact of problem gambling and its links to intimate partner violence, and
- gambling-related harm (including economic abuse) is enabled by current protocols of gambling operators and financial institutions (Hing et al, 2020).

Aboriginal and Torres Strait Islander peoples at significant risk of online gambling harm

The experience of Relationships Australia in delivering Gambling Help Services has revealed that First Nations peoples are at a unique and significant risk of gambling harm. Our counsellors hear accounts of First Nations people opting to gamble more online due to racism faced in traditional gambling venues. This increases vulnerability, and susceptibility to gambling harm. Services must actively engage with First Nations clients in culturally safe ways that minimise the impact of systemic racism and disadvantage. One example of how this has been achieved by Relationships Australia Queensland is through its work with the Murri Court system, where First Nations people are supported to address addictions, including gambling, as a vital element of the court process. Relationships Australia considers that consultation with Aboriginal and Torres Strait Islander communities will assist in identifying the harm minimisation measures necessary to reduce the impact of gambling harm.

Culturally and Linguistically Diverse Communities

Relationships Australia South Australia works with multicultural communities through its Ask Peace Multicultural Gambling Help Service ("Ask Peace"). Ask Peace is a community capacity building program that uses training and education, as well as case work and counselling to engage CALD and refugee communities who are negatively affected by gambling. The experience of RASA in delivering this service has been that stigma and a lack of awareness are two factors that impact the effectiveness of programs and that, to be successful, programs targeting CALD clients must offer hope and empathy, while delivering practical advice and help seeking pathways.

5. The effectiveness of current counselling and support services to address online gambling harm

Relationships Australia sees how gambling harm not only impacts the health and wellbeing of the individuals who engage in gambling, but also negatively impacts those around them including family, friends, colleagues, employers and communities. Help-seeking behaviour in those experiencing gambling related harm is low, with only around 10% seeking help (Queensland Government Statistician's Office, 2018).

Through their delivery of Gambling Help Services (GHS) and similar programs, members of the Relationships Australia Federation are committed to evidence-informed practice and continuous improvement by measuring the outcomes achieved and their impact on clients and their families.

Relationships Australia South Australia (RASA) data collected (including via its DOORS framework (McIntosh, 2011) – see below) in the most recent financial year demonstrates several indicators of client improvement achieved through the GHS, including:

- overall mental health
- managing communication and conflict
- safety in relationships, and
- child wellbeing.

In addition, financial year 2022 data points to a substantial reduction in harm from problem gambling, indicated by a significant reduction in average number of gambling sessions, average time spent gambling, and financial losses per fortnight over the course of counselling.

The value that these services represent was demonstrated in 2019, when RASA engaged BDO EconSearch (BDO) to conduct a Cost Benefit Analysis of its Gambling Help Services. BDO adopted the framework developed by the Productivity Commission in its 1999 inquiry into Australia's gambling industries (Productivity Commission, 1999) to monetise private and social costs and benefits associated with problem gambling as well as transfers of benefit – where a cost in one area is offset by a matching benefit in another. BDO's analysis revealed a benefit cost ratio of 7.0, suggesting that for each \$1 spent on the program, \$7 of net benefit was generated (BDO, 2019).

Our experience has demonstrated a range of factors that are critical to ensuring that services meet the wide-ranging needs of clients, including:

- Holistic approach – prioritising need based on individual circumstances, including family violence, housing crisis, inter-generational trauma
- Specialised addiction approach – harm minimisation model, stages of change model, Motivational Interviewing (all evidence based)
- Family and relationship counselling for both the client and their family
- Screening, risk assessment and safety planning (see below), and
- Financial Counselling.

Screening, risk assessment and safety planning

Screening provides an effective way of identifying risks, and risky behaviours (Hing et al, 2020). RASA uses the Detection of Overall Risk Screen (DOORS) framework (McIntosh & Ralfs 2012), an evidence based universal screening framework for keeping families safe. Use of tools such as DOORS can increase detection of gambling risks, among others, and provide practitioners a judgement-free avenue to raise issues and identify appropriate safety planning avenues for their clients (Hing et al, 2020). To ensure the effectiveness of counselling and support services, screening and risk assessment are critical components of service delivery.

Recommendation

Gambling support services are evidence informed and demonstrated to provide an effective support for those affected by problem gambling and their families. In order to ensure services reach as many clients as possible, Relationships Australia makes Recommendation 2, above.

6. The impact of current regulatory and licensing regimes for online gambling on the effectiveness of harm minimisation and consumer protection efforts

Client voice:

Current harm minimisation and ‘gamble responsibly’ messaging is largely ineffective. That ‘gamble responsibly’ messaging is generally embedded at the end of an advertisement. That the advert has prioritised and embedded a message, often with stimulating visual or narrative concepts designed to recreate the experience of a gambling win (and dopamine release). A brief ‘gamble responsibly’ message in this context, has little intent for the message to be heard, held and acted on. In this context the ‘gamble responsibly message can be received as insincere or tokenistic’.

Relationships Australia welcomes the government’s recent implementation of stricter advertising requirements for gambling products as a means of educating the community about the harms associated with problem gambling. We believe this will go some way to addressing the deficit in clear, accessible messaging at the point where it is most needed. However, existing promotion of gambling products is well-resourced and employs a range of effective marketing techniques that can overshadow the warnings that are needed.

The new government-mandated messaging needs to be given sufficient prominence and accompanied by strategies that help people better manage their gambling (Hing et al., 2019). For these reasons, Relationships Australia endorses the approach taken in Canada by the Canadian Centre for Substance Abuse and Addiction in adopting the Lower Risk Gambling Guidelines, that “safer gambling tips” become a feature in advertising (Lower Risk Gambling Guidelines Scientific Working Group, 2020).

Client voice:

To publicly promote the benefits of behaviour change through a state sponsored advertising campaign, e.g. to be able to watch a sporting fixture without being distracted by the act of gambling on it, to have the resources of time, money and energy to direct towards the aspects of life that matter most.

Recommendation

To ensure that awareness raising and education about the risks associated with gambling, and measures that can be taken to minimise those risks, is far-reaching and effective, Relationships Australia makes Recommendations 3, 4 and 5, above.

7. The appropriateness of current gambling regulations in light of emerging technologies, payment options and products

Regulation needs to keep up with changing technologies. Unregulated expansion of online gambling is not consistent with the public health goal of reducing harm from gambling. Regulation needs to be anchored to a more nuanced understanding of the nature of online gambling and its prevalence, a clear definition of when it is a problem behaviour, and evidence about effective interventions.

Relationships Australia notes developments in recent years which signal policy makers' intention to put in place appropriate regulation (including the work of the Australian Communications and Media Authority in its 2021 review of credit betting prohibitions). However, a consistent and fearless commitment to action is necessary to ensure the regulatory framework remains appropriate in response to emerging technologies and products. So too, is an understanding of the ways that technology impacts the prevalence and accessibility of online gambling, and the tactics employed by providers.

Ease of access

Research suggests that prevalence of behaviours is strongly correlated with increased access to the activity (Griffiths, 2003). A central element of the appeal of online gambling from its beginnings has been its accessibility of place and time. Operators promote unencumbered, frictionless access as a desirable 'feature' of online gambling.

Clients report that the ability to gamble in the physical comfort of their home, providing greater privacy and anonymity, is an attraction of online gambling. At home, they are able to gamble without the fear of stigma or judgement, as occurs in face-to-face interactions. Furthermore, gambling in solitude removes all need for the social etiquette required when engaging in skill-based gambling activities such as poker.

Sometimes, though, home will be inhospitable to gamblers; perhaps partners, parents and children disapprove, or become unwelcome distractions. That no longer presents an obstacle. A gambler with a smartphone and access to Wi-Fi can gamble anywhere – at home, work, school, places of worship, out at the shops, in a park, at the gym between sets, attending medical appointments or while watching the kids play footy - and at any time of day, all day and all night, in succession without pause, if that is their inclination. And that is an inclination that is carefully nurtured by gambling designers and operators.

Meanwhile, anchoring limitations, such as occupational, cultural, emotional and social commitments from gambling, are dismantled and it is more than just possible and convenient, but even inviting, to accommodate gambling activities within every aspect of their lives. Together, these factors support unbridled gambling behaviours, including at antisocial hours and resulting in excessive expenditure.

The option of online betting using credit exponentially increases the accessibility of online gambling by adding a further dimension of accessibility. Not only can you bet anywhere, anytime, but you can even bet without money.

Many of our clients report that they do not feel like they are playing with actual money. They say that it's 'just a figure', and amounts become 'unreal', and they easily lose track of what they have spent. Credit cards and internet transfers are not as tangible as real cash, causing less reflection on amounts spent.

The problem is aggravated by extensive lines of credit (Rintoul and Deblaquiere, 2019, 36) made available to many of our clients, who have used them to fund further gambling activity, often trying to then recover losses with escalating amounts of credit. Due to online banking, transferring money into gambling accounts is easy as mobile phones are frequently used for both banking and gambling activities, and furthers the atmosphere of 'unreality' that our clients report.

Thus, three 'barriers to entry' against gambling – place, time, funds – have been progressively eroded at the same time that enticing new pathways are created. In following sections, we offer a glimpse into how this happens and how it affects people who are particularly vulnerable.

Customer tracking and unsolicited offers

Websites collect diverse data about individual gamblers. We know that gambling companies use very sophisticated software to collect a vast reserve of sensitive information. They have information relating to patterns and finances, and they have many personal details of customers. They can tailor their offerings to the customer's known interests, and many entice them with unsolicited offers (Zangeneh, Griffiths, & Parke, 2008). Operators also manage social media accounts, and use these to post memes, designed to encourage people to tag their friends. This means that, even when using a smartphone for non-gambling purposes, operators can reach out to you, a friend can tag you in a gambling-related post. Gambling companies are sophisticated users of social media to normalise gambling and promote its integration in diverse daily activities. We believe that there is a very fine line between providing what the customer wants and exploitation, and customer tracking raises serious questions about the gradual erosion of privacy. We are also of the view that such questions have been answered effectively in other public health policy areas; for example, tobacco companies would not be permitted to engage in such conduct.

Many of our clients report that once they are on one gambling website they are continuously inundated with marketing material and offers from other gambling websites, and do not know how these sites got their details. Additionally, some clients' foray into online gambling was through their mobile phone's app centre, wherein they came across several gambling apps with various offers - despite not having searched for them— simply because they were 'trending'.

Client story: "He was continuously bombarded with offers"

Our client was a female in her mid-thirties who was seeking assistance with her husband's gambling. She had just discovered that he had lost \$200,000 of the savings they had accumulated for their 'dream home'. Her husband received numerous emails from an online casino gambling site with offers of \$300 of 'free' money to gamble with. He eventually accepted the offer and played the games to the point where his 'winnings' had accumulated to \$1200. At that point, he decided to stop and take the money, believing he had just made \$1200 from nothing. The site would not make the payout telling him he could not withdraw until his winnings were \$3,000. He decided to add \$1800 of his own money to build the balance to \$3,000 and then ask for the payout. The site told him he could not withdraw because he had not *won* the money. He decided to continue playing until he had won his \$1800 back. After 18 months he was still trying, and in the process lost their savings.

Client story: He was glad they took his computer. He was nearly homeless

Our client was a man in his thirties who had just bought his own home and was casually employed. He had recently experienced the loss of his mother after a long illness. During her last years, he reported feeling furious with her for being unwell, and at the same time utterly confused and angry with himself for feeling this way. He gambled to escape the pain of her nearing death. He attended his first session in distress, claiming the retailer was about to "repossess his life" as his mother's entire household (furniture, computer, appliances etc.) were on rental plans and he was behind on payments to the point of repossession. The client said the one good thing was that, when they took his computer, he could not gamble anymore. The stresses in his life and the ease of gambling on line, coupled with the inducements from the operators all contributed to his difficulties in stopping. The client was financially overextended to the point of being at risk of homelessness.

Self-removal and barriers to exit

Relationships Australia frequently hears examples where clients' attempts to cease or minimise their gambling activities are hampered by the practices of providers, both by unnecessarily complicating the process of self-barring and by attempting to "lure" gamblers back.

Clients who seek to reduce their gambling – and even those who have stopped for a period of time – often report receiving attractive incentives if they resume their gambling practices. Many have found that a few weeks after having closed an account, they receive offers of 'free' money (in one instance, \$2,000) or offers to match the amount the client spends to renew gambling activity. This is experienced as oppressive and overwhelming and can make adherence to recovery goals very difficult. These practices should be recognised as predatory and likened to the online scams that will be the focus of the government's recently announced "anti-scam centre".

Predatory behaviours, combined with the high barriers to exit, demonstrate a concerted effort by providers to keep their customers, thereby trapping them in an ongoing cycle of potentially destructive behaviours.

Client story: "The self-barring processes are unmanageable"

Our client was a young man in his early twenties who was studying at University. He was engaged in online sports betting, mainly horse racing. He had decided to stop gambling, and his first step was to bar himself from all the betting companies with whom he had registered. In his experience, the barring processes were convoluted and complicated to the point of being unmanageable. Specifically with regard to a commonly used online betting website, the client could not find a withdrawal or barring option. The client's recovery was significantly undermined by these circumstances.

Relationships Australia notes the regulatory powers recently conferred on the Office of the eSafety Commissioner, and while we note its current focus on online safety by preventing the spread of child sexual exploitation and pro-terror materials, government may wish to consider leveraging the powers of the eSafety Commissioner as part of a whole of government approach that brings to bear the full array of government powers on the issue of online gambling.

Recommendation

For the reasons set out in this section, Relationships Australia makes Recommendations 1 and 6, above.

8. The effectiveness of protections against illegal online gambling services, including casino style gambling such as online blackjack and slot machines

Client story: "They wouldn't release her money for 24 hours"

Our client was a woman in her forties who had recently lost her highly paid fly in/fly out mining job. When working, she gambled at a high level because she had an income that could maintain it. The client told us she gambled on a site that offered mostly casino games. After losing her job, she had difficulties in containing her gambling activity. She said that, when she did have a win, the site refused to payout for twenty-four hours, by which time she had always gambled again. She said that if she had received the money immediately, she might not have. The counsellor looked at the web site, discovered that it was run overseas, and inferred that the site was not subject to Australian Law.

Relationships Australia notes the challenges posed by regulating offshore online gambling casinos within Australia. We also note that these operators appear to be embracing the use of cryptocurrency, which provides

greater privacy and anonymity. In fact, this component of online gambling is growing so rapidly that bitcoin reported (according to 60 cryptocurrency sites) that people are placing 337 bets per second.

Notwithstanding the issues that exist for regulating overseas operators, Relationships Australia considers that further work should be done to investigate extra-territorial options, and that government could look to recent work to combat the creation and distribution of child sexual exploitation material as a useful precedent.

9. The effectiveness of current gambling advertising restrictions on limiting children's exposure to gambling products and services

Client voice:

"A check of my Facebook feed right now has an Australian Turf Club ad, The Victory Hotel, Pointsbet, Pokerllc, The Big Jackpot, Unibet, Mr Hand Pay and McDonalds Monopoly advertising your chance to win." (September 23, 2022)

In our experience, children and young people are particularly vulnerable to online gambling. Games that simulate a gambling activity are easily accessible to these digital natives through sites such as Facebook, TikTok, Twitter, and YouTube, as well as via free apps. Even children are increasingly exposed to and interact with gambling themes, brands, and games because of the difficulties in age-gating social networking sites. Social, non-monetary casino games have proven among the most popular with young people. Although these games are largely free to play, money can be used to further play, and the accurate simulation of gambling activities grooms young people for future engagement with the money driven counterparts.

We believe that online gambling is further normalised for young people through the plethora of advertisements. Many of our younger clients tell us that they have seen advertising or branding for gambling operators on social networking sites, including content shared by other users. Social casino games incorporate components such as leaderboards and competitions, linking to social media accounts. Users are encouraged to share updates and invite their online connections to play, increasing the promotion of gambling-themed games on social media. In our experience, gambling-themed games increase our clients' confidence in winning at gambling and alter perceptions of skill and risk-taking. Many of our younger clients report game operators encourage them to try real-money gambling, and many have gone on to gamble as a result of using social casino games.

We know that teenage years are a confusing time of intense emotions, and young people are vulnerable to anything that numbs feelings and experiences that they might consider to be overwhelming. As with adults, online gambling is addictive for young people because it provides distraction from stress, depression, and anxiety. This is particularly concerning, considering more young people than ever are reporting and/or seeking help for mental health problems. Self-soothing with online gambling can lead to a disengagement from school and peers and cause conflict in relationships with parents, with the difficulties themselves supporting a self-perpetuating cycle of problematic stress management.

Client voice:

"It would be good to see advertising restricted to adult time slots on TV. Though this is not my main area of concern. The advertising on social media is more rampant and deceptive especially on platforms like Facebook, Snapchat, Instagram and Youtube. In society we have criminal laws regarding AVO and stalking and yet the online platforms stalk us with advertisements. My Facebook feed is littered with Gambling Advertising. I am also having lots of twitchers who post videos coming up in my feeds."

Recommendation

For the reasons in this section, Relationships Australia makes Recommendation 7, above.

10. Concluding remarks

The expansion in exposure to, and availability of, online gambling has been rapid, sustained and escalating. The place of online gambling in our society is a contentious, emotive issue. The regulation of online gambling can be considered on a continuum from maximum consumer choice to prohibition, largely with a moral dimension to arguments. In preventing and minimising online gambling-related harm, we recognise that no single strategy could ever be totally comprehensive. However much is achieved, there is always more that can be attempted.

Responsibility for population health is a shared responsibility, conferring both freedoms and obligations on individuals, community groups, businesses, corporations and governments at all levels. In general, we adopt a harm minimisation approach, accommodating what we believe to be personal and socially responsible online gambling practice and policy that balances the rights of individuals to safely access legal online gambling opportunities against the need to prevent, minimise and mitigate harms associated with online gambling.

Thank you again for the opportunity to participate in this inquiry. A list of references used in this submission can be provided on request.

Should you require any clarification of any aspect of this submission, or information on the services that Relationships Australia provides, please contact me or Dr Susan Cochrane, National Policy Manager, Relationships Australia, on 02 6162 9300 (or at ntebbey@relationships.org.au / scochrane@relationships.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Tebbey', with a stylized flourish at the end.

Nick Tebbey
National Executive Officer