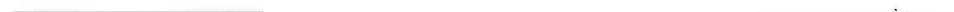


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**MANNINGHAM GAMBLING POLICY  
AND ACTION PLAN 2010-2013**

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## Table of Contents

<b>1. MANNINGHAM GAMBLING POLICY .....</b>	<b>iii</b>
<b>1.1 Policy.....</b>	<b>iii</b>
<b>1.2. Key Policy Objectives and Strategies.....</b>	<b>iii</b>
<b>2. INTRODUCTION.....</b>	<b>1</b>
<b>2.1. The Context .....</b>	<b>1</b>
<b>2.2. Methodology.....</b>	<b>2</b>
<b>2.3. Prevalence of Gambling.....</b>	<b>2</b>
<b>2.4. Electronic Gaming Machines (EGMs) in Manningham .....</b>	<b>3</b>
<b>2.5. Electronic Gaming Machines' Losses .....</b>	<b>3</b>
<b>2.6. Problem Gambling.....</b>	<b>4</b>
<b>2.7. Problem Gambling Among Disadvantaged Groups .....</b>	<b>5</b>
<b>2.8. Problem Gambling in Manningham .....</b>	<b>6</b>
<b>3. ROLE OF STATE GOVERNMENT.....</b>	<b>6</b>
<b>3.1. Gaming Legislation.....</b>	<b>6</b>
<b>3.2. Other Significant Acts, Regulations and Directives .....</b>	<b>7</b>
<b>3.3. 'Taking Action on Problem Gambling' Initiative .....</b>	<b>8</b>
<b>3.4. Changes taking Place in the Gaming Machine Ownership.....</b>	<b>8</b>
<b>3.5. Planning Provisions .....</b>	<b>9</b>
<b>4. ROLE OF LOCAL GOVERNMENT.....</b>	<b>9</b>
<b>4.1. Manningham Planning Scheme.....</b>	<b>10</b>
<b>4.2. Gaps in Manningham Planning Scheme.....</b>	<b>11</b>
<b>5. RESEARCH FINDINGS.....</b>	<b>11</b>
<b>6. CONSULTATIONS .....</b>	<b>14</b>
<b>7. POLICY.....</b>	<b>15</b>
<b>8. MANNINGHAM CITY COUNCIL GAMBLING POLICY – ACTION PLAN18</b>	

## 1. MANNINGHAM GAMBLING POLICY

### 1.1. Policy

This Policy acknowledges the harmful effects and perceived benefits of gambling and is developed in line with both State and Commonwealth government policy with the expectation to minimise gambling related harm and identify potential benefits at the local level. The Policy adopts a public health approach to gambling and is designed to prevent and/or minimise potential harmful social and economic impacts of gambling through a whole of community approach which encompass all stakeholders. This Policy also complements several other Council Policies and Strategies including the Municipal Public Health Plan, Ageing Well in Manningham, Recreation Strategy, Cultural Strategy and the Youth Policy.

Whilst the gambling industry is highly regulated by the Government, this Policy through its Action Plan identifies a range of specific actions to be implemented by Council and other stakeholders to minimise harms and maximise community benefits of gambling at the local level.

### 1.2. Key Policy Objectives and Strategies

#### 1. Council will not encourage or support expansion of gambling activities within the municipality.

##### Strategies

- 1.1 Council will not permit gambling in any Council owned facilities (Community based fundraising raffles and bingo are exempted).
- 1.2 Council "in principle" does not support any initiative that has the potential for the expansion of Electronic Gaming Machine gambling in Manningham.

#### 2. Council in association with other stakeholders will endeavour to minimise gambling related harm and the incidence of problem gambling, and identify potential community benefits.

##### Strategies

- 2.1 Continue to lobby Government to introduce further measures to minimise potential gambling related harm and maximise community benefits in line with Productivity Commission Report 2010 recommendations.
- 2.2 Provide a forum for community service providers and other interested parties to engage in a dialogue to discuss issues relating to gambling with a view to developing initiatives/programs that reduce gambling related harm and incidence of problem gambling.
- 2.3 Provision of a range of community awareness raising activities including the collection and dissemination of information on gambling as appropriate.

#### 3. Council will endeavour to identify, prevent and/or mitigate adverse social impacts of gambling and to increase community benefits through the implementation of its legal and social responsibilities.

Strategies:

- 3.1 Ensure the consideration of social and health impacts of gambling in making decisions related to gambling.
- 3.2 Endeavour to enhance opportunities for the redistribution of gambling revenue for the benefit of the local community
- 3.3 Investigate possibilities of minimising the adverse social impacts of gambling in association with service providers and other councils.
- 3.4 Advocate, support and where appropriate engage in conducting evidence based research on gambling.

**4. Council will continue to develop, maintain and promote a range of sporting leisure and recreation facilities and opportunities in Manningham**

Strategies:

- 4.1 In line with Council's Recreation Strategy develop, maintain and promote a range of sporting, leisure and recreational facilities and activities within Manningham.
- 4.2 Incorporate specific actions that could address issues related to gambling in Council policies and strategies related to sports, recreation and leisure.

## 2. INTRODUCTION

Gambling is a lawful activity which is a recreational pursuit for many people. However it has also produced adverse impacts on many individuals and their families as a result of irresponsible gambling practices. Since the substantial liberalisation of gambling in Australia in the 1990s the gambling expenditure has surged, particularly in relation to gambling with Electronic Gaming Machines (EGMs). In 2008/09, \$67million was lost to EGM's in Manningham alone – a sum equivalent to \$726 per each adult in the municipality. However, the gambling industry in Victoria employs a considerable number of people and provides a significant contribution to Victorian Government revenue.

There are several forms of gambling in Australia regulated under different Federal and State/Territory Government legislation. The main types of gambling in Australia include, gaming where the outcome is largely decided by chance, e.g. Electronic Gaming Machines (EGMs or Poker machines), lotteries, bingo, scratch tickets and card games; and betting or wagering where betting on the outcome of a future event, e.g. betting on horses and sports. Gambling has always been an accepted form of activity that provides entertainment, recreation and socialisation for many people.

However, it is acknowledged that all forms of gambling can have adverse impacts upon some individuals which may also extend to families and communities. Particularly, evidence suggests that gambling by playing EGMs has had the most significant adverse impact upon the community. Even though various forms of gambling have existed in Australian society since its occupation by white people, the need for employing counsellors to support people with gambling problems arose only after making gambling a regulated industry in 1991.

### 2.1. The Context

The impact of gambling is seen as a continuum. At one end, gambling is an activity that provides employment, entertainment, recreation and socialising opportunities and one which the majority of people can 'take in their stride'. At the other end, a small but significant number of people gamble excessively and experience a variety of personal, family and financial problems which has a follow on effect to family, relatives, friends and the general community.

In the 2006 – 2010 Council Plan, Council affirms its commitment to a healthy, safe and caring community: Council Plan Objective 1: "A healthy, safe, caring, involved and diverse community", Strategy 1.2 "Promote a safe, active, healthy community caring for all ages and abilities", and Key Action 1.2.14 "Undertake a review of Council's Responsible Gaming Policy and Action Plan to address any gaps between this and the new gaming provisions within the Local Planning Scheme".

The Gambling Policy provides a framework for Council for decision making in relation to gambling and enables Council to promote its expectations to the local gambling industry and the wider community. The Policy also enables the development of a set of strategies and

actions that will assist in minimising the harms related to gambling and optimising the potential benefits.

## 2.2. Methodology

In reviewing the Gambling Policy an extensive literature review was conducted investigating gambling legislation and various research studies undertaken in relation to gambling including the Productivity Commission Inquiry Report 2010 and gambling/gaming policies developed in other local governments. The review was undertaken initially in association with the Manningham Gambling Policy Steering Committee which is comprised of Council officers, gambling service providers and representatives of other community services. Gambling industry representatives were also consulted during the review process.

The most recent work undertaken has been the development of a discussion paper consisting of background information and research findings which was tabled during consultations. A number of consultations were undertaken with community service providers including Manningham Youth Service Providers' Network and Manningham Community Services Planning Group during the Review. In addition, an internal Working Group consisting of Executive members, several Managers and staff from relevant Service Units was established to assist the Review process.

## 2.3. Prevalence of Gambling

Around 70% of Australians participated in some form of gambling in the last year<sup>1</sup>. Lottery type games remain the most widely popular form of gambling in Australia with approximately 60% of adults participating (Australian Gaming Council 2001). In Manningham, purchasing raffle tickets (59.5%) has been the most popular form of gambling which was followed by lottery (50.2%), horse/greyhound racing (30.3%), poker/gaming (24.5%) and scratch tickets (20.7%)<sup>2</sup> respectively. Furthermore, the Productivity Commission Report 2010 has also identified online gambling as a rapidly growing form of gambling.

Until the early 1990's, gambling in Victoria was largely centred on horse racing and lotteries. However, in 1991, the Victorian State Government legislated the introduction of gaming machines into Victoria. Deregulation of the gambling industry, privatisation of the Totaliser Agency Board (TAB), construction of the State's first casino and the introduction and proliferation of electronic gaming machines (EGMs) throughout the State have had many consequences for communities.

Of all forms of gambling, EGMs have been identified as contributing to more harm due to their ease of access. EGMs are responsible for more problem gamblers than other forms of gambling. As indicated in the Productivity Commission Gambling Inquiry Report while Lotto, 'scratchies' and bingo are less riskier forms of gambling; 'pokies' or electronic gaming machines are more 'riskier' forms of gambling.

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<sup>1</sup> Australian Government, Productivity Commission Inquiry Report No 50 Feb 2010 p.5

<sup>2</sup> Community Indicators Victoria Survey 2007, Statistical Tables for Gambling Survey Respondents for the City of Manningham, School of Population Health, University of Melbourne

**2.4. Electronic Gaming Machines (EGMs) in Manningham**

Currently there are 617 EGMs in Manningham's eight EGM venues, divided evenly between hotels and clubs operated by Tabcorp and Tattersalls. These venues are located in the suburbs of Doncaster East, Doncaster, Bulleen, Lower Templestowe and Warrandyte. There will be changes to current ownership of gaming machines with the introduction of the new Gaming Regulation Amendment (Licensing) Act 2009 which will be effective from 2012. Under the new regulation individual venue operators will be able to bid to acquire and operate EGMs directly and thus ending the duopoly currently operating by Tabcorp and Tattersalls.

**2.5. Electronic Gaming Machines' Losses**

In 2008/09, \$67million was lost to EGM's in these eight gaming venues throughout the City of Manningham – a sum equivalent to \$726 per each adult in the City. In terms of number of EGMs relative to all State municipalities, Manningham is ranked 20<sup>th</sup> and in relation to EGM losses Manningham is ranked 19<sup>th</sup>. In comparison to the previous year 2008/09 Manningham's EGM losses have increased by 3.0%. When adjusted to inflation this is an increase of 1.8%.<sup>3</sup>

**EGM Distribution and Expenses in Manningham  
2009**

	<b>Totals</b>		<b>Ranking</b>
Venues: 2009	8		Relative to all state municipalities
EGMs: 2009	617		20
EGMs per 1,000 Adults: 2008/2009	6.7		39
EGM Gaming Losses 2008/2009	\$67	million	19
Losses per Adult 2008/2009	\$726		25
Cumulative Losses since 1992/3 (2009 dollars)	\$972	million	19
Cumulative Losses per Adult since 1992/3 (2009 dollars)	\$10,511		23
% Change in Losses in year 2008:2009	3.0	%	52
% Change in Losses - adjusted for inflation	1.8	%	*

Source: Compiled by Haden Brown sourcing from Victorian Commission of Gambling Regulation, ABS and Reserve bank of Australia (compiled by Hayden Brown, Greater Dandenong City Council)

The following table shows the gambling losses in the inner eastern region local government areas for the six months period from July to December 2008:

<b>EGM expenditure by LGA July - Dec. 08<sup>4</sup></b>						
July	August	September	October	November	December	Totals

<sup>3</sup> 'Gambling Indicators for Local Areas - Manningham', compiled by Haden Brown, Dandenong City Council sourcing from Victorian Commission for Gambling Regulation, ABS and Reserve Bank of Australia, published in VLGA Website.

<sup>4</sup> Compiled by Inner East Primary Care Partnership sourcing from Victorian Commission for Gambling Regulation.

<b>Boroondara</b>	\$1,704,533	\$1,713,054	\$1,670,521	\$1,648,155	\$1,545,338	\$1,784,313	\$10,065,914
<b>Manningham</b>	\$5,650,955	\$5,712,362	\$5,386,242	\$5,830,571	\$5,815,186	\$6,004,571	\$34,399,888
<b>Monash</b>	\$10,839,119	\$11,171,997	\$10,304,239	\$10,757,795	\$10,423,048	\$11,017,797	\$64,513,995
<b>Whitehorse</b>	\$5,088,668	\$5,229,181	\$4,813,260	\$5,283,831	\$4,922,903	\$5,268,536	\$30,606,377

## 2.6. Problem Gambling

A person may take up gambling with an intention to win, as a way of socialising, relaxing or even as a way of contributing to a charity. Nevertheless, there are some individuals who become problem gamblers. Problem gambling has been defined as "... a chronic failure to resist gambling impulses that results in disruption or damage to several areas of a person's social, vocational, familial or financial functioning... Excessive gambling is used to describe a level of gambling expenditure that is considered to be higher than can be reasonably afforded relative to the individual's available disposable income and as a result produces financial strain".<sup>5</sup>

Impact of problem gambling spreads far beyond the gamblers themselves. The 1999 Productivity Commission report identified that for every one person gambling problematically, 5 –10 others are impacted upon. This includes partners, children, extended families, work friends, schools, health professionals, housing workers, financial counsellors, police, banks, churches and other charitable services. Productivity Commission Report 2010 identifies that harms from problem gambling include suicide, depression, relationship breakdown, lowered work productivity, job loss, bankruptcy and crime. It has further identified gambling as the most common motivation for fraud and the average loss has been 1.1 million per incident (referring to a survey done in 2008). The Public Health and Consumer approach to problem gambling considers characteristics of the product (i.e., EGM technology and environment) itself as the cause of problem gambling rather than vulnerabilities and characteristics of an individual who becomes a problem gambler<sup>6</sup>.

The Productivity Commission Report 2010 has estimated that there are between 80,000 to 160,000 adult problem gamblers in Australia that is 0.5 to 1.0 percent of adults. According to 1999 Productivity Commission Report 2.1% of Australia's (2.14% Victorian) adult population are problem gamblers. In 2003 the Victorian Gambling Research Panel estimated that 1.12% of Victorian adults are problem gamblers. There seems to be a reduction of the number of problem Gamblers over the years. However, the Productivity Commission Gambling Inquiry Report 2010 also indicates that a further **230,000 to 350,000** adults are experiencing moderate risks that may make them vulnerable to problem gambling (1.4 to 2.1 per cent of adults)".

As identified in the Productivity Commission Report 2010, 62% of the total gambling expenditure is derived from EGMs. The risk of problem gambling increases significantly with the frequency of playing EGMs. Those people who play EGMs weekly or more frequently spend on an average around \$7,000-8,000 per annum and of this group around 15% are problem gamblers.

<sup>5</sup> Victorian Government Department of Justice, Problem Gambling, a guide for Victorian schools, 2006, p.10.

<sup>6</sup> Productivity Commission Gambling Inquiry draft Report 2009, p4.3



Estimated problem gambling figures vary with the measuring tools (scales) being used and the prevalence of problem gambling seems to be decreasing irrespective of the measuring tools used over the years. Adaptation theory analysis indicates with people's adaptation to the presence of gambling over time the harmful effects diminish. However over the years a number of harm minimising strategies have been introduced by the Government such as smoking bans in gambling venues, lighting regulations, introduction of clocks, reducing the maximum payout amounts in cash, ATM withdrawals, requirement for cheque payment over \$1,000, limiting opening hours - all these may have contributed in lowering the level of problem gambling. As the Productivity Commission Report 2010 states "*While problem gambling prevalence rates for the adult population as a whole have probably fallen, in relation to the more relevant indicators for policy, there is:*

- *no reliable indication of a significant decline in the rate of problem gambling among regular EGM players*
- *no evidence that the share of total spending accounted for by problem gamblers has fallen.*"<sup>7</sup>

Further measures are being introduced in Victoria to reduce gambling related harm through the implementation of the Gambling Regulation (Licensing) Amendment Act 2009 which includes the introduction of pre-commitment and removal of ATMs from Gambling Venues. Pre-commitment is expected to allow people to stay in control of their gambling (by permitting EGM players to determine prior to commencing playing how long to play and what would be the maximum amount to be spent) and make informed decisions about their play. This will be introduced in stages. From 1 December 2010 all new generation machines should be equipped with pre-commitment capability. This will be required for all machines from 2013 and a more stringent pre-commitment regime will be rolled out from 1 December 2015.

## **2.7. Problem Gambling Among Disadvantaged Groups**

While certain measures have been taken by Government, industry and service organisations to reduce problem gambling and to assist problem gamblers to overcome their habit, such measures and services have not always been effective. Despite the fact that there is a possibility of any individual being addicted to gambling regardless of ones socio-economic or ethnic backgrounds, there are certain cultural groups among whom gambling is more accepted than others. Furthermore, available evidence suggests that gambling losses are higher in communities that are considered to be of a low socio-economic status indicating that the lower the socio economic status the higher the chances of becoming addicted to gambling. As indicated under Section Five of this Policy document, a problem gambler is usually a male, aged 35-64, with low level of education, depends on social security payments, living with others, has a family history of gambling, consumes alcohol and drugs and is depressed.

Due to the stigma attached to problem gambling, many people when presenting to services do not disclose gambling as a contributing factor for their problems. Furthermore, people from culturally and linguistically diverse (CALD) groups are often unaware or do not understand the services that are available and how to access these services, often due to cultural and language barriers. Problem gambling continues to be a hidden issue and easy access to internet gambling has further augmented the problem.

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<sup>7</sup> op cit p.48

## 2.8. Problem Gambling in Manningham

There is no specific data relating to the prevalence of problem gambling in Manningham. While one can assume that Manningham figures should be somewhat similar to the rest of the State, the available information on Gamblers Help service users in the region indicates that Manningham has a fewer number of problem gamblers (who accessed Gamblers Help) than most of the other local government areas in the region (except Yarra Ranges and Boroondara).

Gamblers Help Eastern, the major gambling service provider in the region has employed a full time Problem Gambling Counsellor in Manningham. According to statistical information provided by Gamblers Help Eastern during 2008-2009 the number of clients who accessed their services for problem gambling Counselling are as follows:

Boroondara	22 (6.9%)
Knox	41 (13.0%)
Manningham	27 (8.5%)
Monash	86 (27.2%)
Maroondah	68 (21.5%)
Whitehorse	57 (18.3%)
Yarra Ranges	15 (4.7%)
Total Eastern Region	316 (100.1%)

However, all problem gamblers may not access services provided by Gamblers Help. There are other financial and counselling services that people can access and as stated previously many people do not want to disclose their gambling habits even when they access financial or emergency assistance services.

## 3. ROLE OF STATE GOVERNMENT

The gambling industry as a whole is controlled by the State Government. In Victoria while the Minister for Gaming is responsible for gambling regulation, the Minister for Racing is responsible for the regulation and administration of racing. Regulation of the gambling industry and activities is undertaken by the Victorian Commission for Gambling Regulation (VCGR). The VCGR is responsible for issuing of licenses to venues and employees, and for issuing permits to conduct certain forms of gaming including raffles and bingo. The VCGR also enforces probity, transparency, and other requirements as set out in gaming legislation and regulations.

### 3.1. Gaming Legislation

The Gambling Regulation Act 2003 ("The Gambling Act") has consolidated all previous laws relating to various forms of gambling replacing all existing laws relating to gambling (noting that gambling is the broader term encompassing EGM's and all other forms of gambling including lottery tickets, betting on horse races, sports etc). The Gambling Act is aimed at fostering responsible gambling (by minimising the harm caused by gambling and accommodating responsible gamblers) and promoting tourism, employment and economic development of the State.

Under the Gambling Act the Victorian Commission for Gambling Regulation (VCGR) has been established to oversee the conduct of gambling in Victoria and it is entrusted with the power to grant or refuse an application for a gambling licence. According to the Act, Councils (relevant responsible authorities) may make a submission to the VCGR on a gaming application based on its potential socio-economic impacts on community wellbeing.

Under the current legislation, while hotels are required to pay 33% of their gaming revenue to the State Government - of which 8.3% is deducted for the Community Support Fund - clubs pay only 24.3% of their gaming revenue as tax. However, it is expected that clubs will direct a minimum of 8.3% of their gambling revenue to activities that benefit the community. Community Benefit Statements are intended to verify that such funds have indeed been directed to community projects. While the transparency of the distribution of the Community Support Fund is being questioned by most Councils (as the funding is not necessarily being redistributed to benefit those communities from where the revenue is collected), sometimes, actual community benefits of expenses reported by clubs in their Community Benefit Statements are also being questioned.

### 3.2. Other Significant Acts, Regulations and Directives

In addition to the Gambling Act, there are a number of other acts and regulations that are significant in regulating the gambling industry. They are:

- Casino Control Act 1991;
- Casino (Management Agreement) Act 1993.
- Gambling Regulation Regulations 2005;
- Gambling Regulation (Signage) Regulations 2005;
- Gambling Regulation (Commercial Raffle Organisers) Regulation 2006;
- Gambling Regulation (Infringements Offences) Regulations 2006;
- Casino Control (Boundary Redefinition Fee) Regulations 2005;
- Casino Control (License Fees) Regulations 2005
- Gambling Regulation (Licensing) Amendment Act 2009

The Ministerial Direction issued on 19 September 2002 set the following restrictions on EGMs for approved venues:

- The maximum number of EGMS permitted in all venues (in Victoria) is 27,500;
- The maximum number of EGMs permitted in any one venue is 105;
- At least 20% of EGMs must be located outside the Melbourne Statistical Division; and
- There must be a 50:50 split in the distribution of the 27,500 in hotel and club venues.

In addition the Melbourne Casino is permitted a maximum of 2,500 EGMS. The State Government stipulates the EGM density in all LGAs and by 2010 the number of EGMs must not exceed 10 EGMs per 1000 adult population in all LGAs except in capped local government areas. While Manningham is not a capped area currently there are 6.7 EGMs per every 1000 adults.

It is now a requirement through a Ministerial Direction for each venue to have a Responsible Gaming Code of Conduct approved by the Victorian Commission for Gambling Regulation. The Code of Conduct must comply with Gambling Regulation Act 3003 and should be available to customers including their website (if available). The Code of Conduct is required to include a range of information including a responsible Gambling Message, responsible gambling information and other information such as a pre-commitment strategy, customer and staff interaction processes.

Currently Tattersall's Gaming Limited and TABCORP Holdings Limited are licensed to provide EGM's to licensed venues in Victoria. These two companies are commonly referred to as the 'duopoly' and their license expires in 2012. A third license is held by Crown Limited.

### 3.3. 'Taking Action on Problem Gambling' Initiative

In October 2006 the government announced a five year strategy to address problem gambling- 'Taking Action on Problem Gambling'. The Department of Justice is responsible for overseeing the strategy and the priority areas identified under the strategy are as follows:

- Protecting vulnerable communities;
- Building better treatment services,
- Promoting healthy communities;
- Ensuring a more socially responsible gambling industry;
- Improving consumer protection;
- Enhancing the regulator; and
- Fostering gambling research.

The strategy provides funding of \$132.3 million over five years from 2006-07 to 2010-11 to deliver an integrated approach to consumer protection and to the prevention, early intervention and treatment of problem gambling. Some of the initiatives implemented to date include an advertising campaign highlighting the importance of gambling responsibly, expansion of Gamblers Help services, establishment of a new Centre for problem gambling treatment and research and the Local Community Partnership Grant Scheme that provide funding for community projects targeting problem gamblers.

### 3.4. Changes taking Place in the Gaming Machine Ownership

Commencing from 2012 under the Gambling Regulation (Licensing) Amendment Act 2009 the current duopoly for the gaming machine ownership will cease to exist. The tendering process to determine gaming machine ownerships for a ten year period commencing from 2012 has already been completed. Under the new legislation a club or hotel can operate a gaming business if they hold a current venue operator licence and gaming machine entitlements, have an approved venue and gaming machines, connect their machines to the monitoring system and continue to meet the State's Responsible Gambling requirements. Gaming machines distribution is still 50:50 among clubs and hotels and maintains the 80/20 split of EGMs between metro and country. In order to safeguard smaller clubs up to 40 EGMs or equivalent to the actual number of EGMs (where this number is less than 40) were made available at concessional prices based on current average income of those machines.

Furthermore, a range of other measures have also been introduced through this legislation including:

- Banning of ATMs from 2010. ATMs are not permitted to be located within 50 meters of an entrance to a gaming venue,
- Requirement for venue operators to display a responsible gambling sign outside every entrance to a gaming machine area of an approved venue,
- Limiting the number of machines in a given venue to a maximum of 105,
- Prohibiting a Club venue operator holding more than 420 club gaming machine entitlements (a club may have a maximum of 4 venues) and with regard to hotels prohibits a single hotel owner to own more than 35% of the gaming machines of the Hotels gaming machine entitlements
- Introducing Voluntary Pre-commitment
- Banning gambling advertising outside the gambling area.

### 3.5. Planning Provisions

The Planning and Environment Act 1987 provides a framework for planning the use, development and protection of land in the interests of the present and the longer-term future of Victoria. According to the Act before deciding on an application for a planning permit the responsible authority (Council) may consider any significant social and economic effects of the use or development.

In October 2006 State Government introduced the amendment VC39 to Victorian Planning Provisions providing councils a greater say on the placement of gambling machines in their municipalities. A planning permit is now required to install or use gaming machines, regardless of the percentage of floor space proposed to be allocated to gambling machines (previously gaming machines were permitted to occupy up to 25% of a premises' floor space without a planning permit). This amendment is expected to produce positive social and economic effects by enabling the responsible authority to consider significant social and economic impacts for all gaming machine proposals.

## 4. ROLE OF LOCAL GOVERNMENT

Though the gambling industry is largely controlled via State legislation, local government has a specific role and responsibility in meeting legislative requirements under the various Acts including the implementation of the Planning Provisions through the Planning Scheme. The Local Government Charter which is part of the Local Government (Democratic Reform) Act 2003 identifies that *"The primary objective of a Council is to endeavour to achieve the best outcomes for the local community having regard to the long term and cumulative effects of decisions."* Hence, Council has a responsibility to work towards the elimination or minimising of negative impacts and enhancing the benefits of gambling by having an appropriate policy framework that assists decision making and facilitates working with all stakeholders and through the implementation of the Local Planning Scheme. Productivity Commission Report 2010 has also identified the role of local governments and local communities in having a say on new application for EGMs.

#### 4.1. Manningham Planning Scheme

The Clause 52.28 of the Planning Scheme is intended:

- *"To ensure that gaming machines are situated in appropriate locations and premises.*
- *To ensure the social and economic impacts of the location of gaming machines are considered.*
- *To prohibit gaming machines in specified shopping complexes and strip shopping centres."*

Pursuant to Clause 52.28-2 "a planning permit is required to install or use a gaming machine. This does not apply in either of the following circumstances:

- *Clause 52.28-3 or Clause 52.28-4 specifically prohibits a gaming machine.*
- *The gaming machine is in an approved venue under the Gambling Regulation Act 2003 on 18 October 2006 and the maximum number of gaming machines for the approved venue on 18 October 2006 is not exceeded."*

Under the Manningham Planning Scheme Clause 52.28-3 gaming machines are prohibited in the following shopping complexes:-

- Jackson Court Shopping Centre, Doncaster East
- Tunstall Square shopping Centre, Doncaster East
- Westfield Doncaster Shoppingtown
- The Pines Shopping Centre, Doncaster East
- Bulleen Village Shopping Centre, Bulleen

Furthermore, Clause 52.28-4 prohibits gaming machines in a strip shopping centre. A strip shopping centre is an area that meets the following requirements:

- it is zoned for business use;
- it consists of at least two separate buildings on at least two separate and adjoining lots;
- it is an area in which a significant proportion of the buildings are shops;
- it is an area in which a significant proportion of the lots abut a road accessible to the public generally.

In addition, Council can consider significant social and economic effects for all gaming machine proposals. Pursuant to Clause 52-28-6 Decision Guidelines, before deciding on an application, the responsible authority (Council) must also consider as appropriate:

- The State Planning Provisions Framework and the Local Planning Provisions Framework, including the Municipal Strategic Statement and local planning policies.
- The compatibility of the proposal with adjoining and nearby land uses.
- The capability of the site to accommodate the proposal.
- Whether the gaming premises provides a full range of hotel facilities or services to patrons or a full range of club facilities or services to members and patrons.

#### 4.2. Gaps in Manningham Planning Scheme

Most of the existing gaming machines are currently located in existing hotels and clubs outside the activity centres including the Manningham Club Hotel, Bulleen; Templestowe Hotel, Templestowe; Yarra Valley Country Club, Bulleen; Veneto Social Club, Bulleen; Shoppingtown Hotel, Doncaster; Cherry Hill Tavern, Doncaster East and Doncaster Inn, Doncaster. The Warrandyte Football Club at the Warrandyte Hotel which is located within one of the neighbourhood centres also has gaming machines.

It is recognised that there are some opportunities for the location of gaming machines elsewhere within the municipality including sporting clubs, existing licensed venues outside strip shopping centres. While 10 gaming machines per 1000 adult population within a given municipality being the government's permitted EGM density, in Manningham the current EGM density is 6.7. Therefore, there is a possibility for receiving planning applications for increasing the number of EGMs in Manningham either in existing venues or in new venues.

The Local Planning Scheme is unable to control or restrict other forms of gambling other than EGMs (such as TABs and sale of Tattsлото and 'scratchy tickets'). A TAB is considered as a shop under the planning scheme and therefore, no planning permit is required within a Business 1 Zone. Similarly Tattsлото and associated 'scratchy tickets' often are part of a newsagent and are also classified as shops.

### 5. RESEARCH FINDINGS

Research relating to gambling has identified both disadvantages as well as benefits of all forms of gambling. Gambling has produced adverse social and economic impacts on some individuals and their families as well as the community. Conversely, gambling also provide some benefits. The main benefit is that all forms of gambling provide recreational opportunities for many people while providing economic benefits to the community such as employment and tax revenue for the government.

There are a range of studies undertaken nationally and internationally on gambling habits and impacts. It is recognised that there are limitations inherent to individual studies undertaken, particularly due to under sampling and the techniques used (such as different problem gambling indexes used). Current research provides valid and reliable descriptions of gambling demographics and impacts of gambling. As indicated in "A Review of Australian Gambling Research"<sup>8</sup> some of the major findings are as follows:

- Overall participation of males and females in gambling is very similar, although males are more likely to participate in a wide range of gambling activities.
- Males are more likely to experience gambling related problems.
- While women are more likely to gamble to escape problems and relaxation, men gamble to win money.
- Older people (55+ years) are less likely to experience gambling problems compared to younger age groups. The 18-24 year old age group is more likely to experience

<sup>8</sup> A Review of Australian Gambling Research, August 2008, Commissioned by Gambling Research Australia for the ministerial Council on Gambling

gambling related problems (3-4% Australian teenagers experience gambling related problems).

- There is very limited research undertaken into gambling among CALD and the indigenous population.
- Impacts of gambling identified vary depending on the type of study. Impacts tend to be higher when a study is undertaken with the help seeking population than a study conducted using a telephone survey.
- About 15-20% of problem gamblers identified in community surveys had mental health issues and this figure was more than 50% in studies conducted with help seeking populations.
- Substance abuse and smoking is also common among problem gamblers.
- Breakdown of relationships and neglect of family responsibilities have been identified as significant impacts of problem gambling.
- Loss of productivity change of jobs and loss of employment have also been identified as vocational impacts of problem gambling.
- Problem gambling is usually associated with higher expenditure on gambling.
- There are significant problems in using survey data to estimate gambling expenditure accurately.
- It is difficult to estimate gambling related crime rates either because of concealment or not consistently listing in court records.
- Research suggests that gambling rates are higher in correctional populations (around 10+ times higher) than the general population.
- Most studies have identified a very high level of participation (70%+) in EGM gambling.
- Information available on people's main reasons for gambling on EGMs is inconsistent. While people gamble to win money they do not usually expect to win.
- Some studies have identified that EGM features such as the number of play lines, bonus features, and low cost, impact on people's choice of machine.
- Machine modification studies have identified that limits on note-acceptors and maximum bet size may play a role in reducing gambling expenditure but limits on play-speed may not be as effective.
- There is evidence to believe that problem gamblers use EGMs as a form of avoidance or emotion-based coping suggesting an element of psychological addiction. Consequently EGMs may be problematic for psychologically vulnerable people with histories of anxiety, trauma and depression.
- Based on findings of the studies undertaken in relation to economic impacts, the Review indicates that EGMs make a negative contribution to local economies because the multiplier effects for the gambling industry are generally smaller than other potential industries; and contributions to the local economy also reduces due to high tax rate on EGM revenue.
- Most studies have indicated that higher gambling expenditure (and in some cases also higher problem gambling rates) is associated with high concentration of EGMs and EGMs tend to locate in areas with greater social disadvantage.
- At least half of the gamblers who gamble on EGMs travel only a short distance from their home to gamble.

The above Review has also reviewed harm minimisation strategies, interventions and services. As identified such strategies, interventions and services and their effectiveness are as follows:



- Primary strategies are those that attempt to address problems before they develop. Primary strategies such as school education campaigns, community education and in-venue information have been identified as useful. However, it has been stated that there is insufficient research evidence currently available to support their long term effectiveness.
- Secondary strategies try to minimise risks once they have started to develop. They include venue/machine modifications such as increased lighting, introducing clocks, removal of ATMs from venues and shutting down machines at certain intervals and introducing smart card technology. While there is little support on the effectiveness for measures such as changes to lighting the addition of clocks and effectiveness of other measures are yet to be identified.
- Tertiary intervention refers to treatment services. The review indicates that while there are many descriptive analyses of clients seeking help from services, very few systematic evaluations of services have currently been undertaken. Only a few small-sample clinical evaluations of specific psychological interventions have been completed.

**Some of the major findings of the Productivity Commission Report 2010 include:**

- *There is strong evidence that gambling can have adverse health, emotional and financial impacts on many more people than those categorised as 'problem gamblers'.*
- Problem gamblers account for around 40 % of total EGM spending.
- Around 600,000 Australians or 4% of the adult population play pokies at least weekly, around 15% or 95,000 of them are problem gamblers.
- While the gaming industry providing accessible venues for local communities, large tax concessions enjoyed by clubs cannot be rationalised on basis of community benefits realised.
- The benefits of gambling from tax revenue and enjoyment for recreational gamblers ranged between \$12.1 and 15.8 billion and the cost of problem gamblers ranged between \$4.7- 4.8 billion. The overall net benefit is estimated to be between 3.7 and 11.1 billion. These net benefits could be much higher if governments reduce the costs through effective preventive and harm minimisation policies.
- A shrinking interest in gambling by some has been partly offset by intensifying interest by others. Real spending per EGM gamble has grown strongly, in Victoria average annual spending of those who play EGMs has risen in real terms from around \$1,750 per person in 1999 to nearly \$3,100 in 2008.
- While there is little evidence on the effects of school based gambling education programs on students' gambling behaviour, considering evaluations of similar programs in alcohol and vehicle safety such education programs can raise awareness but they tend to have no, or even adverse behavioural effects.
- In addition a number of findings have made in relation to treatment, gaming futures and machine design, access to cash and credit etc. which are specifically relevant for Federal and State level decision making.

**Profile Characteristics**

- Characteristics of a regular Gambler are:
  - Male;
  - Aged 50-64 or over 65;

- Low level education (below tertiary level);
  - Low income;
  - Receives aged or invalid pensions;
  - Born in Australia<sup>9</sup>.
- Characteristics of a Problem Gambler
    - "Male (the majority of the regular gamblers are also males);
    - Aged 50-64 and 35-49;
    - Relatively low levels of education (below tertiary level);
    - Derive main income from social security payments (other than age pension);
    - Live with others who could be affected on daily basis.
    - Live in metropolitan areas;
    - Have a family history of gambling;
    - Consume alcohol and drugs;
    - Depressed."<sup>10</sup>

The Public Health approach to problem gambling focuses on likely influences on individual behaviours from a range of social, cultural political, institutional and environmental factors. This approach goes beyond the traditional approach where the focus was only on the individual behaviour. Thus epidemiological framework was identified in the 1999 Productivity Commission report and according to the report problem gambling is influenced by venue features, accessibility, game features, government policies, information, industry behaviour, help available and gambler characteristics and behaviour. Public health initiatives addressing problem gambling primarily focus on prevention. Treatment focused initiatives would be secondary.

"A public health framework involves a comprehensive and integrated approach to the problem and engages many sectors in working towards solutions. Problem gambling is not seen as the sole domain of governments, counsellors or industry but creates the opportunity for all sectors to work toward defined and measurable goals within a whole of population approach"<sup>11</sup>.

## 6. CONSULTATIONS

Consultations undertaken revealed the following in relation to Manningham<sup>12</sup>:

- Approximately 9% of Manningham residents believe that gambling is a form of recreation.<sup>13</sup>
- Gambling is a hidden problem.
- Due to the stigma attached to gambling, those who have gambling problems are reluctant to access available services.

<sup>9</sup>Gambling Research Panel, 2003 Victorian Longitudinal Community Attitudes Survey (prepared by the Centre for Gambling Research, Australian National University), GRP Report No. 6,

<sup>10</sup> Ibid p. 12

<sup>11</sup> Kate Roberts, "A Public Health Approach to Gambling", Gambling and Public Health International Newsletter, May 2009

<sup>12</sup> Some of the statements made during consultations may not necessarily be based on factual information but can be subjective statements or opinions of individuals or groups of individuals. They may or may not be factually correct.

<sup>13</sup> Manningham Community Panel, Household Survey 2008.

- Cultural practices and beliefs of some cultural groups may encourage gambling and discourage the use of gambling services.
- Some of the prevailing conditions may enhance the propensity to excessive gambling, i.e., proximity of ATMs, extended opening hours and flexibility in serving of alcohol.
- Young people prefer to go to the Crown Casino.
- Some people who have limited income try their luck by taking up gambling.
- Social isolation/boredom can lead to gambling..
- There has been an increase in the demand for emergency financial assistance (usually people do not reveal their gambling addiction).
- Problem gambling sometimes correlates with mental health issues.
- In relation to gambling venues operated by Clubs the revenue is always returned to the community. (All clubs are not for profit organisations and therefore any income generated through their operations is to benefit members in accordance with the Rules (constitutions) of individual clubs. While this is true in theory there can be variations based on the management arrangements of individual clubs, e.g. land on which Yarra Valley Country Club is located belongs to Woolworths).
- Gambling venues provide affordable dining out options and entertainment
- Advertising/provision of free meals for children and subsidised meals for seniors by venue operators is a marketing technique that has the potential to induce some parents and seniors to take-up gambling.
- Gambling venues are accessible for people with disabilities
- Some gambling venues provide culturally appropriate services to certain groups (eg. Veneto Club, RSL Clubs).
- In addition to direct economic benefits provided by gambling venues (such as employment) the local suppliers also benefit.

Considering the research findings and community consultation outcomes, it is apparent that the negative impacts of gambling, particularly of EGMs, outweigh the beneficial impacts. There is a co-relation between the problem gambling and accessibility to gaming, ie, number of venues, location, opening hours and internal design and atmosphere of venues etc.

## 7. POLICY

This Policy acknowledges that there are disadvantages as well as benefits of gambling and is developed in line with both State and Commonwealth government policy with the expectation to minimise gambling related harm and maximise potential benefits at the local level. This Policy adopts a public health approach to gambling and is designed to prevent and/or minimise potential harmful social and economic impacts of gambling through a whole of community approach which encompass all stakeholders. This Policy also complements several other Council Policies and Strategies including the Municipal Public Health Plan, Ageing Well in Manningham, Recreation Strategy, Cultural Strategy and the Youth Policy.

Whilst the gambling industry is highly regulated by the Government, this Policy through its Action Plan identifies a range of specific actions to be implemented by Council and other stakeholders to minimise harms and maximise community benefits of gambling at the local level.

**7.1 Key Policy Objectives and Strategies**

- 1. Council does not encourage or support expansion of gambling activities within the municipality.**

Strategies

- 1.1 Council will not permit gambling in any Council owned facilities (Community based fundraising raffles and bingo are exempted).
- 1.2 Council "in principle" does not support any initiative that has the potential for the expansion of Electronic Gaming Machine gambling in Manningham.

- 2. Council in association with other stakeholders will endeavour to minimise gambling related harm and the incidence of problem gambling, and identify potential community benefits.**

Strategies:

- 2.1 Continue to lobby Government to introduce further measures to minimise potential gambling related harm and maximise community benefits in line with Productivity Commission Report 2010 recommendations
- 2.2 Provide a forum for community service providers and other interested parties to engage in a dialogue to discuss issues relating to gambling with a view to developing initiatives/programs that reduce gambling related harm and incidence of problem gambling.
- 2.3 Provision of a range of community awareness raising activities including the collection and dissemination of information on gambling as appropriate.

- 3. Council will endeavour to identify, prevent and/or mitigate adverse social impacts of gambling and to increase community benefits through the implementation of its legal and social responsibilities.**

Strategies:

- 3.1 Ensure the consideration of social and health impacts of gambling in making decisions related to gambling.
- 3.2 Endeavour to enhance opportunities for the redistribution of gambling revenue for the benefit of the local community
- 3.3 Investigate possibilities of minimising the adverse social impacts of gambling in association with service providers and other councils.
- 3.4 Advocate, support and where appropriate engage in conducting evidence based research on gambling.

- 4. Council will continue to develop, maintain and promote a range of sporting, leisure and recreation facilities and opportunities in Manningham.**

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Strategies:

- 4.1 In line with Council's Recreation Strategy develop, maintain and promote a range of sporting, leisure and recreational facilities and activities within Manningham.
- 4.2 Incorporate specific actions that could address issues related to gambling in Council policies and strategies related to sports, recreation and leisure.

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**8. MANNINGHAM CITY COUNCIL GAMBLING POLICY – ACTION PLAN**

**Policy Objective: 1. Council will not encourage or support expansion of gambling activities within the municipality.**

Strategy	Action	Timeline	Responsible Agency
1.1 Council will not permit gambling in any Council owned facilities (Community based fundraising raffles and bingo are exempted).	1.1.1 The introduction of EGMs will not be permitted in Council buildings including buildings used by sporting clubs. 1.1.2 Council will not permit those community groups who occupy/use Council buildings to organise any activities that promote gambling (within Council buildings). 1.1.2 Council will support and encourage Council funded or supported community organisations to have their own gambling policies.	Ongoing  Ongoing  Ongoing  Ongoing	Council  Council  Council  Council
1.2 Council "in principle" does not support any initiative that has the potential for the expansion of EGM gambling in Manningham.	1.2.1 Council will discourage any gaming application that has the potential to increase the ratio of EGMs per adult population, number of gambling venues or the gaming expenditure in Manningham. 1.2.2 Council will not support gaming activities that are operated in isolation and encourage offering gaming activities along with other non-gaming recreational activities. 1.2.3 Council will oppose new applications to locate EGMs in close proximity to shopping centres, activity centres and children's and youth facilities.	Ongoing  Ongoing  Ongoing  Ongoing	Council  Council  Council  Council

**Policy Objective: 1. Council will not encourage or support expansion of gambling activities within the municipality (Contd.)**

Strategy	Action	Timeline	Responsible Agency
	<p>1.2.4 Council will review the Manningham Planning Scheme with a view to introduce measures to close existing gaps within the Planning Scheme relating to regulation of gambling (to provide guidelines for decision making on location of gambling venues, number of EGMs etc.).</p> <p>1.2.5 Council will not support the introduction or change of current arrangements of EGMs unless the proposal can demonstrate a net socio-economic benefit to the community.</p> <p>1.2.6 Enforce local planning regulations related to gambling.</p>	<p>2010/11</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Council</p> <p>Council</p> <p>Council</p>

**Policy Objective: 2. Council in association with other stakeholders will endeavour to minimise gambling related harm and incidence of problem gambling and maximise potential community benefits.**

Strategy	Action	Timeline	Responsible Agency
<p>2.1 Continue to lobby Government to introduce further measures to minimise potential gambling related harm and maximise community benefits in line with Productivity Commission Report 2010 recommendations.</p>	<p>2.1.1 In partnership with other councils and peak organisations such as MAV/VLGA lobby State Government to introduce measures to further reduce gambling related harm including introduction of limitations to marketing techniques used by venue operators and increase the share of the Community Support Fund.</p> <p>2.1.2 Initiate and promote a dialogue with neighbouring councils and other relevant organisations on issues related to the provision of children's play areas in and around gaming venues with a view to ensure that<sup>14</sup>:</p> <ul style="list-style-type: none"> <li>• children attending bistros or entertainment areas of gaming venues are not visually or audibly exposed to EGMs or other forms of gambling;</li> <li>• only non-violent games of skill are provided and no games of chance and coin operated games are provided in children's play areas located in gaming venues;</li> <li>• venues do not promote the provision of children's entertainment as a form of child minding while the parents gamble;</li> </ul>	<p>Ongoing</p> <p>Ongoing</p>	<p>Council/MGPSC*</p> <p>Council</p>

\* Manningham Gambling Policy Steering Committee (MGPSC)

<sup>14</sup> Adopted from Macedon Ranges Shire Council's Electronic Gaming Machine (Pokies) Community Policy



<b>Policy Objective: 2. Council in association with other stakeholders will endeavour to minimise gambling related harm and incidence of problem gambling and maximise potential community benefits (contd.)</b>			
<b>Strategy</b>	<b>Action</b>	<b>Timeline</b>	<b>Responsible Agency</b>
	<ul style="list-style-type: none"> <li>• no child is admitted to a gambling venue entertainment event without their parent;</li> <li>• venue staff ensure parents are present at all times in the play areas;</li> <li>• children do not pass by gambling area on their way to play/entertainment or bistro areas;</li> <li>• no promotion, advertising aimed at children.</li> </ul> <p>2.1.3 Participate in relevant regional/State networks involved in promoting responsible gambling eg. Eastern Region Gambling Group, LGWGOC</p> <p>2.1.4 Advocate for appropriate policy/legislative reforms by participating in appropriate forums/consultations and making submissions to relevant authorities (collectively with other Councils or individually as appropriate).</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Council/MGPSC</p> <p>Council</p>
2.2 Provide a forum for community service providers and other interested parties to engage in a dialogue to discuss issues relating to gambling with a view to developing initiatives/programs that reduce gambling related harm and incidence of problem gambling.	<p>2.2.1 Review the membership and continue to facilitate the Manningham Gambling Policy Steering Committee (MGPSC) on an annual basis and as needed.</p> <p>2.2.2 Facilitate and/or participate in a gambling forum as appropriate.</p>	<p>Ongoing</p> <p>As Appropriate</p>	<p>Council</p> <p>Council/MGPSC</p>

**Policy Objective: 2. Council in association with other stakeholders will endeavour to minimise gambling related harm and incidence of problem gambling and maximise potential community benefits (contd.).**

Strategy	Action	Timeline	Responsible Agency
2.3 Provision of a range of community awareness raising activities including the collection and dissemination of information on gambling as appropriate.	2.3.1 Collect relevant gambling information (eg. annual statistics, trends, changes in industry regulations/codes of practice, research findings etc.) and make presentations to appropriate audiences such as MG/PSC, Manningham Community Services Planning Group (MCSPG)	As Appropriate	Council/ Gamblers Help/Manningham Gambling venue operators
	2.3.2 Offer gambling information/educational sessions (including sessions intended to de-stigmatize and educate on the right to ask for help/access services when needed and sessions targeting partners of people with a gambling addiction) to the general public and specific groups.	Ongoing	Gamblers Help/Council
	2.3.3 Develop and implement initiatives that enhance gambling awareness among particular groups including seniors groups and HACC clients.	Ongoing	Council/Gamblers Help
	2.3.4 Encourage and support Gamblers Help to continue its services to the local gambling venue operators and their employees including training and debriefings.	Ongoing	Council/Gamblers Help
	2.3.5 Investigate and where possible implement the options available for community awareness raising on the potential harms associated with non-EGM gambling (e.g. Tattislotto, Horse racing, Scratch tickets)	2010	Council/Gamblers Help
	2.3.6 Arrange media releases/articles in Manningham Matters on gambling related issues as appropriate.	Occasionally	Council/MGPSC/ Gamblers Help

**Policy Objective: 3. Council will endeavour to identify, prevent and/or mitigate adverse social impacts of gambling and to increase community benefits through the implementation of its legal and social responsibilities**

Strategy	Action	Timeline	Responsible Agency
3.1 Ensure the consideration of social and health impacts of gambling in making decisions related to gambling.	<p>3.1.1 Incorporate gambling related issues into consultations/surveys conducted by Council annually.</p> <p>3.1.2 In considering planning applications for the introduction of new or relocating existing EGMs, Council examine the potential social/health impacts of those applications in accordance with the local Planning Provisions and in consultation with the community.</p> <p>3.1.3 Council in making decisions relating to sporting, recreational and leisure facilities (including their establishment, placement and promotion), consideration will be given to their potential to provide alternatives for gambling.</p> <p>3.1.4 In association with other Councils, VLGA and MAV continue to lobby government to release all available information on gambling including problem gambling statistics based on LGAs.</p>	<p>Ongoing</p> <p>As appropriate</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Council</p> <p>Gamblers Help/ Council.</p> <p>Council</p> <p>Council</p>

**Policy Objective: 3. Council will endeavour to identify, prevent and/or mitigate adverse social impacts of gambling and to increase community benefits through the implementation of it legal and social responsibilities (Contd.)**

Strategy	Action	Timeline	Responsible Agency
	<p>3.1.5 As part of a large social support program with a range of community activities on offer, Council will limit activities for seniors in venues where there are EGMs to those which provide older residents the opportunity to access facilities/activities that are amenable to the client profile and demographic such as entertainment, meals and socialisation.</p> <p>3.1.6 Council will continue to inform senior citizens' groups of Council's position on gambling and provide information and advice on matters related to problem gambling.</p>	<p>Ongoing</p> <p>Occasionally</p>	<p>Council</p> <p>Council</p>
3.2 Endeavour to enhance opportunities for the redistribution of gambling revenue for the benefit of the local community.	<p>3.2.1 Encourage, support, and recognise sponsorship programs and community grants programs of local gambling venue operators;</p> <p>3.2.2 Investigate the possibility of negotiating with local gambling venue operators to establish a community fund to assist local community service providers.</p> <p>3.2.3 Investigate the feasibility of introducing a differential rating system for gambling venues in Manningham with a view to collecting additional income to be invested in a program to support socially and economically disadvantaged families/individuals within the municipality.</p> <p>3.2.4 Identify appropriate projects to be funded via the Community Support Fund and make submissions.</p>	<p>Ongoing</p> <p>2011</p> <p>2011</p> <p>As Appropriate</p>	<p>Council</p> <p>Council/MGPSC</p> <p>Council</p> <p>Council/Community Service Organisations</p>

**Policy Objective: 3. Council will endeavour to identify, prevent and/or mitigate adverse social impacts of gambling and to increase community benefits through the implementation of its legal and social responsibilities (contd.)**

Strategy	Action	Timeline	Responsible Agency
<p>3.3 Investigate possibilities of minimising the adverse social impacts of gambling in association with service providers and other councils.</p>	<p>3.3.1 In association with other regional local councils and service providers investigate the possibility of establishing risk and protective factors relating to the propensity for problem gambling with a view to promote appropriate interventions to prevent, reduce and/or minimise gambling related harms.</p> <p>3.3.2 Encourage and support the strict implementation of established codes of practices (which are approved by the VCGR) of venue operators.</p> <p>3.3.4 Investigate projects successfully implemented in other LGAs to minimise gambling related harm and where appropriate implement similar projects in Manningham.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Council/MGPSC/Eastern Region Gambling Group, Community Service Providers</p> <p>Council, MGPSC, Gamblers Help</p> <p>Council</p>
<p>3.4 Advocate, support and where appropriate engage in conducting research.</p>	<p>3.4.1 Advocate and support research projects relating to gambling undertaken by external organisations.</p> <p>3.4.2 Whenever appropriate undertake research on gambling patterns, trends as well as on socio economic impacts of gambling (directly or in association with other local or regional stakeholders).</p>	<p>As requested</p> <p>As requested</p>	<p>Council/MGPSC</p> <p>Council/MGPSC</p>

<b>Policy Objective: 4. Council will continue to develop, maintain and promote a range of sporting, leisure and recreation facilities/opportunities in Manningham.</b>			
<b>Strategy</b>	<b>Action</b>	<b>Timeline</b>	<b>Responsible Agency</b>
4.1 In line with Council's Recreation Strategy develop, maintain and promote a range of sporting, leisure and recreational facilities and activities within Manningham.	4.1.1 Develop, maintain and improve a diverse range of sporting, leisure and recreation facilities and activities.	Ongoing	Council
	4.1.2 Promote sporting, leisure and recreational activities particularly among the vulnerable and disadvantaged community groups including socially isolated residents.	Ongoing	Council/MGPSC
	4.1.3 Continue to support and assist community groups (eg neighbourhood houses, senior citizens groups etc.) that provide recreational opportunities to members of the local community in line with Council's Municipal Public Health Plan and other strategies/ policies	Ongoing	Council
	4.1.4 Include and promote leisure and recreation activities when organising events/programs related to health and wellbeing such as Manningham Healthy Lifestyle Week, Multicultural Morning Tea (for seniors).	Ongoing	Council/Community Service Organisations
	4.1.5 Offer, facilitate and support a range of events that enhance recreational opportunities and increase social capital within the municipality. e.g., Movies in the Park, FreeZa events, Walks etc..	Ongoing	Council
4.2 Incorporate specific actions that could address issues related to gambling in Council policies and strategies related to sports, recreation and leisure.	4.2.1 Where appropriate consider issues related to problem gambling and the possibility of promoting alternative activities in developing new policies/strategies or reviewing existing policies/strategies related to sports, recreation, leisure, youth, aged and/or multicultural services etc.	Ongoing	Council