

28 May 2024

Department of Justice and Community Safety

RE: Gaming Machine Monitoring Discussion Paper

In response to the current Gaming Machine Monitoring Licence Review currently being undertaken, the Victorian Local Governance Association (VLGA) is uniquely placed to provide a submission as an organisation with expertise on the impact of gambling harm from a local government perspective.

The VLGA has long running experience in this space, convening the Local Government Working Group on Gambling (LGWGOG) for over 20 years, which serves as an effective forum for local government representatives to share knowledge and understanding of the impact of gambling, gambling policy and its effects on the local community.

The VLGA will be responding to discussion questions that overlap with our purpose and deliverables as an organisation, through the lens of reducing gambling harm within a public health approach. Our submission hopes to highlight the key issues to be considered in any future decision-making regarding gaming machine licences.

What do you consider to be the advantages and disadvantages of real-time reporting to venue operators and the VGCCC?

- The transparent and immediate availability of information more properly enables venues to enact on their duty of care for consumers in line with their operating licence. Real-time reporting allows for an immediate response to any outstanding issues.
- Real-time reporting makes it very clear to venues the indicators of harm that are present. This should increase the standard at which venues are required to respond and remedy any obligations that are not being met.
- With the increasing amount of licence conditions being imposed on venues which focus on gambling harm minimisation, real-time reporting allows for these measures to be accurately responsive to outstanding issues that may be included in any gambling harm risk management plan and/or harm minimisation policy and procedures manual.

What changes, if any, should there be to enhance the YourPlay pre-commitment system requirements?

- The establishing of lower pre-set defaults.
- That the YourPlay system requirements are in no way able to be linked to a rewards or venue loyalty scheme.

Do you have any comments on the process for reviewing the monitoring and pre-commitment fees and what, if any, changes should be made to the price review process?

- The VLGA would like to comment that any review of the price process should take into consideration the increasing instance of Club venues approaching Local Government for support in an exit from operating gaming machines. With Club venues unable to take on substantial debt on entitlement, any decisions regarding pre-commitment fees should not further contribute to the financial burden and inability of venues to cease Electronic Gaming Machine operation.

Do you have any views on ways to promote innovation and future investment in technology for the monitoring system and connected gambling harm systems?

- Any investment in technology needs to be done in alignment with an ability for consumers to be informed and supported to make choices for better health outcomes.

Do you have any views on how data and information from the monitoring system can be used to enhance harm minimisation, minimise criminal influence, ensure privacy and data security, or otherwise improve regulatory compliance?

- As Local Government is continually responding to the impact of gambling harm on the community, there are Council decisions and policy choices that can be better supported with an increase in local data being captured and distributed.
- Any additional information helps lessen the response burden placed at a Council level, by assisting decision and community messaging. This data can be in the form of:
 - Losses at each venue by hour of the day.
 - YourPlay demographic indicators (age, postcode etc)
 - The YourPlay average pre-set limits for local venues, how often patrons reach their limit at each venue, and how quickly it took for patrons to hit their limit.
- The VGCCC is transparent about what data is recorded and available at Councils request.

Do you have any views on the use of monitoring data for research, evaluation or other purposes?

- Local Government relies on academic research to make informed decisions, and the availability of data for this research and evaluation is paramount.



Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Arndt', is positioned above the printed name.

Kathryn Arndt
Chief Executive Officer