



**CITY OF
BALLARAT**

City of Ballarat

Gaming Machine Community Policy

August 2011

Community Development

**BALLARAT CITY COUNCIL
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TABLE OF CONTENTS

1	DOCUMENT CONTROL INFORMATION	2
2	POLICY STATEMENT	3
3	OWNER	3
4	APPLICABILITY	3
5	DEFINITIONS	3
6	PROCEDURE AND GUIDANCE NOTES	4
	BACKGROUND	4
	LEGISLATIVE CONTEXT.....	4
	CITY OF BALLARAT GAMING PROFILE.....	4
	PROBLEMS CAUSED BY GAMBLING.....	7
	PEOPLE WITH PROBLEMS CAUSED BY GAMBLING.....	9
	VULNERABLE COMMUNITIES.....	10
	THE COSTS AND BENEFITS OF GAMING.....	11
	COMMUNITY BENEFITS.....	12
	PRE-COMMITMENT AND SELF-EXCLUSION.....	14
	ACCESSIBILITY.....	15
	PROTECTING VULNERABLE COMMUNITIES.....	16
	HARM MINIMISATION.....	16
	COMMUNITY AWARENESS.....	17
	PROVIDING CHOICE.....	17
7	COMPLIANCE RESPONSIBILITIES	18
8	CHARTER OF HUMAN RIGHTS COMPLIANCE	18
9	REFERENCES AND RELATED POLICIES	18

1 DOCUMENT CONTROL INFORMATION

DOCUMENT CONTROL

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2 POLICY STATEMENT

Intent:-

The City of Ballarat recognises Electronic Gaming Machine (EGM) gambling or 'gaming' is a recreational activity that is enjoyed by a large number of residents as well as visitors to the region. However, unlike many other recreational activities, gaming has the potential to generate negative social and economic impacts for the player, their family and friends and the wider community. There is a large body of evidence that demonstrates the adverse consequences which result from problem gambling including financial loss, relationship breakdown and reduced health and wellbeing.

Council is concerned by the prevalence and accessibility of EGMs in the Ballarat area and the potential harmful impacts this has. Both the number of gaming machines and expenditure per adult is higher than in other regional Victoria municipalities and significantly higher than the State average.

As a result the City of Ballarat has developed the following EGM Community Policy. The aim of the policy is to ensure that an appropriate balance is struck between providing access to EGMs and their recreational benefits, and Council's broader responsibilities relating to community well being and health.

3 OWNER

The owner of this policy is the Chief Executive Officer.

All enquiries regarding this policy should be initially directed to Information Services – Governance Unit.

The Coordinator Community Planning is responsible for administration of this policy.

Enquiries regarding this policy need to be directed to the Coordinator Community Planning.

4 APPLICABILITY

The policy provides a framework for Council decision making on issues relating to Electronic Gaming Machines within the municipality.

5 DEFINITIONS

The policy commentary includes a number of referenced definitions and evidence based data and resources.

6 PROCEDURE AND GUIDANCE NOTES

BACKGROUND

Electronic Gaming was legalised in the State of Victoria in 1991 and electronic gaming machines (EGMs) were introduced to clubs and hotels in Victoria in June 1992. Electronic Gaming activity grew dramatically in the late 1990s and currently there are 26,772 EGMs spread across 515 hotels & clubs in the State.¹ As a result, the accessibility of EGMs has increased from a very low level (to access an EGM interstate travel was required) to a situation where most Victorian residents now enjoy ready access to gaming.

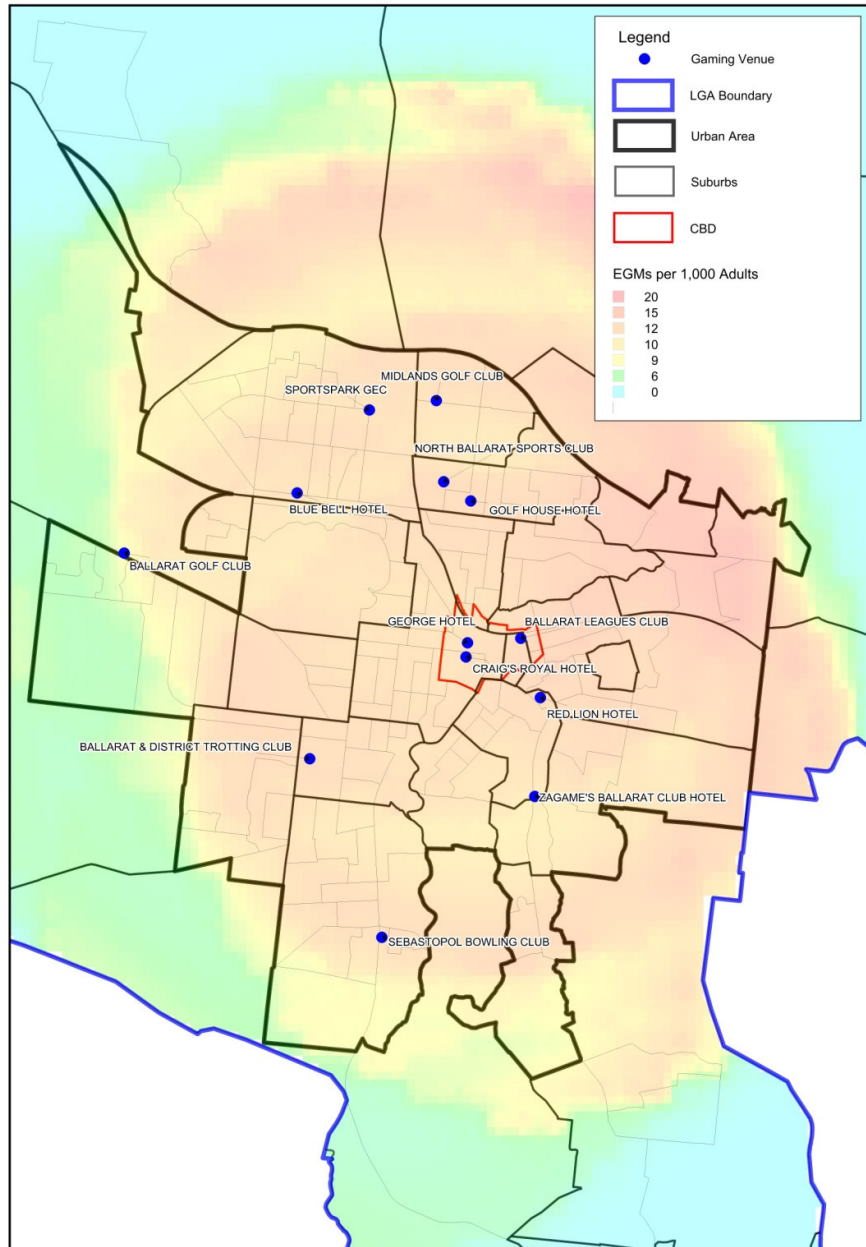
LEGISLATIVE CONTEXT

In Victoria, regulation of the gaming industry and activities is the responsibility of the Victorian Commission for Gambling Regulation (VCGR). The Gambling Regulation Act 2003 is a key piece of legislation designed to govern the conduct and licensing of gaming. Another important piece of legislation is the Planning and Environment Act 1987. Through this legislation, Councils manage gambling issues in relation to planning approvals for venues and in minimising harm to communities from gambling.

CITY OF BALLARAT GAMING PROFILE

This section provides an overview of existing conditions with respect to gaming and its associated social benefits and costs in the City of Ballarat. There are currently 13 gaming venues in the City of Ballarat, which provide a total of 636 EGMs. The number of EGMs located in the City is lower than permitted under the existing Regional Cap level for the City of Ballarat of 663 EGMs. However, under the new gaming industry arrangements to come into effect in 2012 a total of 663 EGM licenses were purchased for the Ballarat area.

All existing venues are located in the urban and suburban areas surrounding Ballarat's CBD (an area of around 76 hectares). There are currently no gaming venues located in the rural areas in the northern and southern parts of the LGA. As a result, although the City of Ballarat has a relatively small number of venues per hectare across the entire LGA, within the urban centre, the number of venues per hectare is comparable with middle ring metropolitan Councils (around 1 venue per 5 hectares). Due to the concentration of population around Ballarat's CBD, approximately 82% of residents live within 2.5km of a gaming venue. Moreover, many residents can access multiple venues within 2.5km of their home (see Map 1). This concentration of EGMs in the Ballarat area is of concern given the relationship that has been found between the availability of EGMs, problem gambling and expenditure on EGMs.² There is strong evidence that the majority of gamblers travel only a short distance (under 5km) from home to gamble.^{3,4,5}



Map 1: Proximity to Gaming Venues – Coloured areas indicate how many gaming venues are located within 2.5 kilometres.

EGMs located in the City of Ballarat generated total revenue in 2010 of over \$55,477,327, equivalent to around \$768 per person adult resident. Using Productivity Commission findings (1999⁶, 2010⁷) as only 33% of the adult population play poker machines in a given year, this equates to \$2,326 per EGM player. The number of EGMs and total expenditure in Ballarat are high when compared with other municipal areas and the Victorian average, a fact that has attracted much attention and concern within the Ballarat Community (see Table 2.1).

Table 2.1: EGM Expenditure within Selected Areas

	Adult Population	Venues	EGMs	EGM per 1,000 adults	Expenditure per adult
Ballarat (C)	72,268	14	657	9.09	\$759
Bendigo (C)	79,118	10	547	6.91	\$559
Shepparton (C)	6,553	7	329	7.07	\$628
Victoria	4,251,486	514	26,682	6.28	\$611

Source: VCGR 2011; ABS 2009; CPG 2010

However, these data do not necessarily describe the gaming expenditure of the City of Ballarat’s residents. This is because, VCGR data relate to all expenditure on EGMs within a particular Local Government Area (LGA), but not necessarily expenditure by residents of that same area. As a result, it is possible that the expenditure of local residents is higher or lower than that indicated by the venue data, depending on the extent to which visitors play EGMs and/or residents play EGMs in other LGAs.

To illustrate, MarketInfo data derived from the ABS Household Expenditure Survey suggest that in the order of 8% of all EGM expenditure in the City of Ballarat is a result of spending by non-residents (equivalent to approximately \$4.2 million). In order to understand this discrepancy, Ballarat’s role as a regional centre and tourism destination must be considered. As the City of Ballarat’s Economic Development Strategy notes, Ballarat serves a wide regional catchment approaching 195,000 people. Moreover, the municipality attracts nearly two million international and domestic visitors each year, bringing over \$358 million per annum to the local economy. It is clear then, that Ballarat acts as an employment, education and entertainment hub for the region, resulting in EGM revenues in Ballarat that are high relative to the size of the local population. The situation in other LGAs varies depending on their geographical context. LGAs located close to popular gaming areas on the northern side of the Murray River, such as Moama, tend to be net ‘exporters’ of gaming expenditure.

Further to issues associated with inter-municipal migration of EGM expenditure, average adult expenditure in regional Victoria, and in particular in regional cities, is higher than the state average. To illustrate, MarketInfo data suggest that in 2008/09 expenditure per adult was \$740 and \$761 in Regional Victoria and regional urban centres respectively, compared with a state average of \$618 adult.* This considered, the expenditure profile of Ballarat’s residents is similar to the Regional Victorian average and other LGAs which incorporate major regional cities (See *Table 2-2*).

* State average spend per adult calculated using MarketInfo data is lower than indicated by VCGR’s venue data due to the contribution of tourists to gaming revenues in the state (approximately 6%).

Table 2.2: EGM Expenditure of Residents of Selected Areas

Region	Expenditure by Residents	% of total Expenditure	Expenditure per adult	+/- average
Ballarat (C)	\$53,361,621	0.93	\$753	\$13
Bendigo (C)	\$58,950,336	1.27	\$761	\$21
Shepparton (C)	\$35,343,903	1.15	\$773	\$32
Geelong	\$122,587,284	1.02	\$735	-\$6

Source: MarketInfo 2009; CPG 2010

PROBLEMS CAUSED BY GAMBLING

Unlike many other recreational activities, gambling has the potential to generate negative social/economic impacts for the player, their family and friends and the wider community. Problems result when players spend more money or time playing than they or their households can afford. Behaviour of this type is generally referred to as problem gambling, to illustrate:

Problem gambling is characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community⁸

Individuals experience difficulties in limiting the time and money they spend on EGMs for a number of reasons, including, where the player:

- has faulty 'cognitions' underpinning their choices
- fails to appreciate the risks to themselves ('it might happen to someone else, but not me')
- has their judgment impaired by alcohol (since the main venues offering gambling — casinos, clubs and hotels — also offer alcohol)
- is vulnerable, for example, because they suffer from emotional or mental health problems.

Problem gambling can be characterised as a continuum of increasing severity. At one end, recreational gamblers gain clear benefits from gambling and the social environment in which gambling is offered. At the other end are people experiencing (or causing) severe harms as a result of their gambling. Between these two extremes, there are people facing either heightened risks of future problems or varying levels of harm.

A number of screening techniques are used to identify people with problems caused by gambling within a population. Drawing on the most recent surveys which employ the Canadian Problem Gambling Index (CPGI), the Productivity Commission (PC) (2009) found that the prevalence rate for problem gambling (measured as a score of 8 or more on the CPGI Survey) is likely to range between 0.5 and 1 per cent of Australia's adult population. The Commission used

scores of 8 or more on the CPGI to indicate the prevalence of problem gamblers as around 91.3 per cent of regular gamblers scoring in this range experience significant problems. Individuals that score less than 8 on the index still face some risk of experiencing adverse consequences because of their gambling. For example, 39.8 per cent of those rated as being at moderate risk, experience adverse consequences as a result of their gambling. According to the Productivity Commission (2010) EGMs are both the most lucrative and potentially most damaging segment of the Australian gaming industry, accounting for around 75-80 percent of people with problems caused by gambling.

Table 2.3 below shows the proportion of the population for different Regions that fall within each CPGI risk categories. The City of Ballarat is incorporated within the Grampians region.

Table 2.3: Proportion of Problem Gamblers in Selected Regions

Region	Non Gambler	Low Risk	Moderate Risk	Problem Gambler	<i>Experience Problems</i>
Barwon South West	20.4%	5.1%	1.8%	0.37%	1.3%
Gippsland	21.6%	5.2%	1.8%	0.45%	1.4%
Grampians	20.1%	5.6%	3.4%	0.05%	1.7%
Hume	18.5%	5.4%	1.9%	0.38%	1.4%
Loddon Mallee	18.8%	6.1%	2.3%	0.78%	1.9%
Eastern Metro	31.7%	4.4%	1.8%	0.25%	1.2%
North West Metro	29.2%	6.8%	2.7%	1.18%	2.5%
Southern Metro	28.0%	5.6%	2.6%	0.78%	2.0%
Victoria	26.9%	5.7%	2.4%	0.70%	1.9%

Source: DoJ 2009; PC 2009; CPG 2010

As Table 2.3 shows, the proportion of the Grampians Region population with problems caused by gambling is substantially lower than all other Regions in Victoria. However, the proportion of the Grampians Region population that are moderate risk gamblers is much higher than other regions. The net effect of these discrepancies is that approximately 1.7% of the Grampians population may be experiencing adverse consequences as a result of their gambling, compared with other municipal areas and the Victorian average, a fact that has attracted much attention and concern within the Ballarat Community (see Table 2.1).

PEOPLE WITH PROBLEMS CAUSED BY GAMBLING

In its 1999 report the PC concluded that there are few clear socio-demographic factors that pre-dispose people to a higher likelihood of problem gambling. To illustrate, the PC found that while average personal income appears to be somewhat lower among people with problems caused by gambling the difference is slight. Similarly, Jackson *et al.* (1999) found that people with gaming problems have a similar level of income to other adults.⁹ However, it was found that people who are separated or divorced, unemployed, or living in single-person households are more highly represented among problem gamblers. Also, some groups of consumers - such as people with intellectual or mental health disabilities - are particularly vulnerable to problems when gambling. For example, people with depression and bipolar disorder have a much higher likelihood of developing gambling related problems. Overall, around 35 per cent of people with problems caused by gambling have a severe mental disorder compared with around 2 per cent of non-problem gamblers.

The findings of the PC are largely supported by the Victorian Government's recent study, *A Study of Gambling in Victoria - Problem Gambling from a Public Health Perspective*.¹⁰ This study provides demographic data for the problem gambler population in Victoria. As Table 2.4 shows, people who live in low income households are under-represented in the population of problem gamblers in Victoria, while those with moderate incomes are over-represented. The data also shows that people with lower levels of education, single parents, people who live alone and the unemployed are over-represented in the problem gambler population.

Table 2.4: Demographic Profile of Problem Gamblers

		Problem Gamblers (%)	All Persons (%)
Personal Income	\$0-\$31,199	44.5	60.7
	\$31,200-\$51,999	33.7	20.6
	\$52,000-\$83,199	18.4	12.6
	\$83,200 or higher	3.6	6.2
Speaks other language at home		29.6	25.6
Highest completed education level	University	20.8	30.4
	Trade or TAFE	18.9	19.2
	Year 12	27.8	22.5
	Year 10 or lower	32.6	27.9
Type of Household	One parent family	10.0	6.7
	Lone person	11.2	8.9

Unemployed	6.2	3.6
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Source: Department of Justice 2009

In addition to work investigating the demographic characteristics of people with problems caused by gambling, the Department of Justice (DoJ) has conducted work that demonstrates that those with a gambling problem are much more likely to have recently experienced one or more traumatic life events (see Table 2.5).

Table 2.5: Experience of Life Events by Problem Gambler Status

Life Event	Non Problem Gamblers	Low Risk Gambler	Moderate Risk Gambler	Problem Gambler
Major change to your financial situation	15.4%	19.8%	29.2%	45.9%
Major injury or illness to either yourself or someone close to you	20.8%	24.0%	24.7%	45.3%
Troubles with your work, boss or superiors	8.3%	10.9%	15.9%	20.3%
Death of someone close to you	25.6%	29.6%	35.5%	32.2%
Divorce	2.2%	2.8%	5.1%	9.4%

Source: DoJ 2009

Consistent with the DoJ findings, research work conducted by Thomas *et. al.*¹¹ has explored the motivational drivers of EGM players, in particular people with problems caused by gambling. The most common drivers identified were a desire to escape loneliness, isolation, feeling overwhelmed by stress, and negative feelings surrounding life changes/transitions (i.e. job loss, end of study, children leaving home, retirement). The researchers also conclude that attempts to encourage players to use alternative recreational outlets must respond to these motivational drivers. The impression given by official data and qualitative research is consistent with the experience of gambling support workers who work in the City of Ballarat. These workers report that their clients come from all parts of the Ballarat community, including from disadvantaged as well as advantaged households.

VULNERABLE COMMUNITIES

The disadvantage experienced by certain communities may magnify the harm they experience due to problem gambling. For example, for those with limited financial means, impacts may be compounded or experienced sooner. This is because people with a lower socio-economic status tend to have fewer of life's financial 'safety nets' – such as insurance, a good credit record, friends and family with the means to lend financial support, employability through educational qualifications and a sound employment history. Gambling support workers in the City of Ballarat support this view and stress that gambling problems can create more severe impacts for vulnerable individuals.

THE COSTS AND BENEFITS OF GAMING

As discussed above, the majority of EGM players enjoy the activity and do not experience any adverse consequences as a result of their play. However, for those affected the cost can not only be life changing, they can have both harmful consequences to people close to them and the wider community. A large body of evidence has been collected that demonstrates the adverse consequences which result from problem gambling including:

- Family breakdown and relationship stress affecting both the person with problems caused by gambling and several others (children, partners, siblings, parents etc)
- Financial losses. In 2008-2009 around \$11.9 billion was lost on EGMs in Australia.⁷
- Because of the capital intensive nature of EGM gambling, a shift in spending away from activities such as retail spending, cafés and restaurants towards gaming can lead to a fall in employment¹²
- Depression and anxiety - although some may be depressed before their problems develop, gambling can exacerbate pre-existing conditions
- Suicides¹³
- Crime. A number of recent Australian studies have found strong links between EGM gambling and increased income generating crime such as theft, robbery and fraud, in the host community.¹⁴

In its 1999 study the PC estimated that the social costs associated with gambling were large, worth somewhere between \$1.8 billion and \$5.6 billion. When compared with the social benefits of gambling, the PC concluded that the net social benefit of gambling in Australia was worth between a net cost of \$1.2 billion and a net benefit of \$2.6 billion. Global estimates hide differences in the distribution of benefits and costs between different gambling modes. Closer inspection of the data shows that EGM gaming performs comparatively poorly in terms of delivering a net benefit to society (see Table 2.6). The PC's estimates suggest that both the benefits and the costs associated with gaming are likely to be high in the City of Ballarat and therefore that measures to reduce the negative impacts associated with gaming are required.

Table 2.6: Consumer benefits, Social Costs and Net Impacts of Gambling by Mode in Australia

Mode	Net Consumer benefit (\$ Million)	Net Social Costs (\$ Million)	Net Benefit (\$ Million)*
Wagering	629 - 885	267 - 830	(201) - 617
Lotteries	1,232 - 1,498	34 - 106	1,126 - 1,464
Scratchies	219 - 266	24 - 74	145 - 243
EGMs	1,617 - 2,491	1,369 - 4,250	(2,624) – 1,122
Casino Gambling	581 - 771	48-150	431 - 723

Other	103-184	57-176	(73) - 127
All Gambling	4,365 - 6,076	1,800 - 5,856	(1,221) – 4,277

Source: PC 1999; * Figures in Brackets represent a loss

COMMUNITY BENEFITS

In Victoria, under the *Gambling Regulations Act 2003*, net gaming revenues from hotels with gaming machines are subject to an additional tax of 8.3 per cent. The additional tax paid by hotels is directed to the Community Support Fund (CSF). The additional tax payable by hotels does not apply to club venues provided clubs make a community benefit contribution of at least 8.33 per cent of their net gaming revenues.

Clubs must produce a Community Benefit Statement outlining what community benefit contributions they have made. In simple terms, if a club fails to demonstrate that it spends at least 8.3 per cent of its net gaming revenue on activities that benefit the community, then it may be required to pay the additional 8.33 per cent tax as if it were a hotel.

Concern has been expressed in the past by a number of commentators, including community groups in the City of Ballarat, about the range of activities that can be counted as community benefits. Specifically, it has been argued that club activities and purposes that benefit the club and its members, but which cannot be clearly shown to extend to the wider community, should be explicitly excluded from the CBS.

A COLLABORATIVE APPROACH

EGM gaming is an issue that generates vigorous debate within the City of Ballarat. The City of Ballarat recognises the role that venues play in the community in terms of providing recreation and generating revenue which supports the operation of clubs and community organisations and/or which is redistributed via the Community Support Fund. The City of Ballarat also recognises the concerns expressed by gambling support agencies and the broader community about the impact that problem gambling has for individuals, their family and friends and the broader community.

The City of Ballarat supports a collaborative approach to minimising the harms and maximising the benefits which flow from gaming. In order to ensure an open dialogue between gaming venues, the community services sector and the broader community the City of Ballarat will continue to support the Ballarat Responsible Gambling Committee. This Committee is comprised of venue representatives, Councillors and Council Officers, members of the community whose lives have been affected by problem gambling and providers of support services to problem gamblers.

Policy 1 - The City of Ballarat supports a collaborative approach to managing the impacts of gaming. To this end, the City of Ballarat will continue to support the collaborative work of the Ballarat Responsible Gambling Committee

HARM REDUCTION

As the preceding Section shows, while EGM gaming brings benefits to the Ballarat community, there are also a number of harms it causes both to individuals and the broader community. The primary objective of a Council is to strive to achieve the best quality of life for people in the local community. This is reflected in the strategic direction of Council as set out in the Council Plan and relevant plans and strategies, in particular the Health and Wellbeing Plan. In endeavouring to achieve a healthy and safe community, the City of Ballarat is committed to reducing the harms which result from gaming and supports the use of a broad range of measures and strategies to ensure the impacts of problem gaming are reduced in the City.

Consistent with the Productivity Commission the City of Ballarat believes that changes to the nature of gaming machines themselves provide the most direct and promising avenue for harm minimisation. As the PC states:

Changes to gaming machines provide the most promising avenue for harm minimisation. Gaming machines should be a safe and enjoyable recreational pursuit and their design, use and regulation should reflect that.

In order to deliver the objective of making gaming machines safe and enjoyable, the PC recommends that maximum bet limits be reduced in order to make the cost of playing EGMs comparable with other forms of entertainment. The PC recommends that bet limits be set so that the maximum amount that can be spent in one hour is around \$120. Despite recent bet limit reductions from \$10 to \$5 per spin, the amount that can be bet remains high (up to a maximum of \$6,000 per hour) as does the potential for consumers to bet well beyond their means in a short period of time.

In addition to reducing bet limits on EGMs, the PC has recommended that the amount of cash that can be entered into a machine be capped. Specifically, it is recommended that the maximum amount of cash that can be inserted into a gaming machine should be \$20, with no further cash able to be inserted until the maximum credit on the machine falls below \$20. The advantage of a low cash input level is that gamblers who play at high intensity would have to reinsert cash continually. This would act as a succession of short breaks in play and would make it clearer to them how much they were spending.

In lieu of legislative changes to minimum bet and maximum cash insertion points there are a number of other harm minimisation strategies that may be adopted by gaming venues. These include: separating entrances to gaming machines and other venue activities; limiting hours of operation; placing child play areas well away from the sights and sounds of EGMs; restricting access to ATMs and EFTPOS; and, ensuring staff are adequately trained in responsible gaming.

Policy 2 - Gaming machines should be a safe and enjoyable recreational pursuit and their design should reflect that. To this end, the City of Ballarat encourages all venues to adopt harm minimisation strategies and will advocate to government and peak bodies for the adoption of maximum bet and cash insertion limits consistent with Productivity Commission recommendations.

PRE-COMMITMENT AND SELF-EXCLUSION

As discussed above, some individuals experience difficulties in limiting the time and money they spend on EGMs, in part due to obstacles to genuinely informed choice. The PC has concluded that measures that allow gamblers to determine limits on their playing - pre-commitment - provide the best means for improving informed consent. Pre-commitment can take one of two forms:

- Self Exclusion - self-exclusion is an extreme form of pre-commitment, in which gamblers can bar themselves from one or more gambling venues to prevent themselves from gambling. The Gambling Regulation Act 2003 requires an obligation that all gaming venue operators have an approved Self Exclusion program. This is in addition to the venue's Responsible Gambling Code of Conduct.

The PC suggests the following activities could improve the effectiveness of self exclusion programs:

- implementing jurisdiction-wide programs, supported by a database of self excluded patrons
- making it is easier to self-exclude at venues and other places (such as gambling support offices)
- requiring longer minimum periods of self-exclusion and more stringent requirements for their revocation.

The findings of the Auditor General's report ¹⁵ recommend that criteria should be reviewed to make sure approved codes of conduct and self-exclusion programs contain commitments by venue operators to actions that are able to be audited and that training better assists venues to implement responsible gambling measures.

- Pre-commitment - EGM players set pre-determined spending limits before they commence play, which cannot be broken without some consequence. It may soon be mandatory in Victoria for EGM venues to offer a pre-commitment program.

The PC has assessed that self-exclusion and pre-commitment schemes offer great potential in minimising the harm which results from problem gambling. As a result, the City of Ballarat will work with industry and community stakeholders through the Ballarat Responsible Gambling Committee to ensure that the self-exclusion and pre-commitment strategies used by gaming venues are as effective as possible. Committee meetings will be used to discuss existing arrangements and to enable service providers and community representatives to make suggestions regarding potential improvements.

Policy 3 – The City of Ballarat will work in a collaborative manner through the Ballarat Responsible Gambling Committee to ensure that self exclusion and pre-commitment strategies are effective as possible.

When assessing a planning application, preference is given to gaming machines to be located in venues which deliver a net benefit to the community. In assessing EGM applications, the City of Ballarat will take into consideration the following: the accessibility of the EGMs including the venue location and harm minimisation measures adopted by the venue, and the likely impact on the community. This is explained in more detail below:

ACCESSIBILITY

The term accessibility relates to how much effort is required by a person to seek out an opportunity to play an EGM. Accessibility for a particular individual can be influenced by a number of factors, including: the number and distribution of venues in their local area; the number of EGMs these venues provide; travel time to venues; the availability of public transport; the desirability of particular venues; venue opening hours, etc.

Following legalisation of EGMs in the State of Victoria in 1991, accessibility has increased substantially and at present around 82% of residents of the City of Ballarat live within 2.5 kilometres of a gaming venue (See Map 1). Moreover, the number of EGMs per adult in the City of Ballarat (9.6) is higher than in other regional municipalities and significantly higher than the Victorian State Average (see Table 2.1). While this situation partly reflects the fact that Ballarat is a regional recreational hub and popular tourism destination, the City of Ballarat is concerned with the prevalence and accessibility of EGMs and the associated harms to the community including significantly higher than average levels of expenditure. Consequently, the City of Ballarat considers that some limits on accessibility are appropriate:

- Reducing the number of EGMs
The City of Ballarat will selectively and strategically seek to reduce the numbers of EGMs in Ballarat.

-
- Prohibited
Gaming venues are prohibited from locating in shopping complexes or strip shopping.
 - Discouraged areas
Gaming venues should not be located in areas:
 - within the most disadvantaged 20% of collection districts in Victoria
 - within close proximity to uses associated with people's day to day activities such as convenience shops, medical centres, child care, schools and community centres etc.
 - More desirable areas
It is more desirable for gaming venues to be located in areas:
 - proximate to but not in the core of activity centres
 - where residents have a number of choices of entertainment and recreation facilities in the local area
 - where there are currently limited existing gaming opportunities for residents
 - where the redistribution of EGMs results in a net decrease in EGMs from an area of socio-economic disadvantage
 - in the Central Business District (CBD) and tourism precincts where they will be accessible to visitors to Ballarat

PROTECTING VULNERABLE COMMUNITIES

As stated previously, the disadvantage experienced by certain communities may magnify the harm they experience due to problem gambling. Consequently the City of Ballarat is not supportive of EGMs being highly accessible to vulnerable communities. Several indicators can be used to determine the vulnerability of a community which may be assessed according to relative disadvantage, level of community engagement and connectedness, and lifestyle of the community including gambling, substance abuse, crime and perceived safety.

HARM MINIMISATION

If a venue adopts a number of harm minimisation strategies including effective pre-commitment and self-exclusion schemes, the potential of the venue to cause harm would be substantially reduced. In these cases, it may be appropriate to relax restrictions on accessibility.

Policy 4 – The City of Ballarat will limit the accessibility of EGMs by:

- *Advocating to the Victorian State Government for a reduction in the Regional Cap (currently 663 EGMs) back to the Victorian State Average.*
- *Assessing applications, and selectively and strategically seeking*

to reduce the numbers of EGMs in Ballarat, taking into consideration: the location of the venue, harm minimisation measures adopted by the venue, and the likely impact on the community.

- *Further developing a framework that clearly defines the suitability or otherwise of proposed EGM venue locations to be detailed as a schedule to the Gaming Policy.*

COMMUNITY AWARENESS

Community education can assist in addressing problem gambling, in particular by encouraging those affected to seek help. The City of Ballarat will continue to work in the area of community awareness and support initiatives such as Responsible Gambling Awareness Week.

Policy 5 - The City of Ballarat will continue to disseminate information about the risks associated with EGM gaming, services that are available in the community for those affected by problem gambling, and alternative recreational activities.

PROVIDING CHOICE

As discussed above, many of those who develop problems associated with EGMs are seeking a recreational activity that provides a distraction from life stressors. The City of Ballarat is committed to ensuring that EGM gaming is only one of a number of potential recreational choices for people in the community that meet this need. Qualitative research conducted with problem gamblers indicates that alternative activities must target the underlying motivations of the player. The City of Ballarat is committed to understanding in greater depth the range of activities that can act as viable substitutes for EGM gaming, and ensuring that these opportunities exist within the community.

Policy 6 – The City of Ballarat will work in collaborative manner with the Ballarat Responsible Gambling Committee to identify alternative recreational activities targeted at the needs of problem gamblers.

7 COMPLIANCE RESPONSIBILITIES

Manager Community Development
 Coordinator Community Planning
 Ballarat Responsible Gambling Committee

8 CHARTER OF HUMAN RIGHTS COMPLIANCE

This policy has no direct human rights compliance issues.

9 REFERENCES AND RELATED POLICIES

This section should reflect all research used or other relevant information associated with this policy. Where possible you should quote the location of the information which may be a website location. If any of these section are not relevant input N/A in the second column.

	Include - Name, Reference and location of reference
Acts	GAMBLING REGULATIONS ACT 2003 PLANNING AND ENVIRONMENT ACT 1987
Regulations	
Codes of Practice	
Guidance notes	
Australian Standards	
Related Policies	CITY OF BALLARAT COUNCIL PLAN 2009-13 CITY OF BALLARAT MUNICIPAL PUBLIC HEALTH AND WELLBEING PLAN 2009 - 13
References	<ol style="list-style-type: none"> 1. VCGR Website 8 April 2010 2. Abbot, M., Volberg, R, Bellringer, M, & Reith, G. (2004). <i>A review of research on aspects of problem gambling: Final report</i>. London: Prepared by the Gambling Research Centre, Auckland University of Technology for the Responsibility in Gambling Trust (RIGT). 3. Delfabbro, P. (2008). <i>A review of Australian gambling research</i>. Victoria, Melbourne: Gambling Research Australia/Victorian Department of Justice. 4. Marshall, D.(2005) The gambling environment and gambler behavior: Evidence from Richmond-Tweed, Australia. <i>International Gambling Studies</i>, 5(1), 63-83 5. McMillen, J., Marshall, D., Ahmed, E., Wenzel, M., (2004) <i>Victorian longitudinal community attitude survey 2003</i>. Prepared for the Gambling Research Panel by the Centre for Gambling Research, Australian National University. Australia: Department of Justice. 6. Productivity Commission. (1999). <i>Australia's gambling industries</i>. Canberra: Commonwealth of Australia 7. Productivity Commission. (2010). <i>Gambling</i>. Volumes 1 & 2

	<p>Canberra, Australian Government</p> <p>8. Neal, P., Delfabbro, P. and O'Neill, M. (2005), <i>Problem Gambling and Harm: Towards a National Definition</i>, Report prepared for the National Gambling Research Program Working Party, Melbourne</p> <p>9. Jackson, A., Thomas, S., Thomason, N., Borrell, J., Crisp, B., Ho, W., Holt, T., and Smith, S. 1999b, <i>Analysis of Clients Presenting to Problem Gambling Counselling Services July 1997 to June 1998</i>, Client and service analysis report no. 4, prepared for and published by the Victorian Department of Human Services (p.g. 19-20)</p> <p>10. Department of Justice. (2009) <i>A Study of Gambling in Victoria - Problem Gambling from a Public Health Perspective</i>. Melbourne, Australia: Victorian Government</p> <p>11. Thomas, A., Sullivan, G., Allen, F., (2009), A theoretical model of EGM problem gambling: more than a cognitive escape, <i>International Journal of Mental Health and Addiction</i>, Vol 7:1 pp97-107</p> <p>12. Pinge, I., (2008) <i>Electronic gaming machines in Bendigo – assessing their economic impact</i>. Australia: City of Greater Bendigo.</p> <p>13. Chow-Fairhall, J., Watkins, D., de Castella, A., Kouzman, N., Hollander, Y. & Butler, S. (2006). Suicide and problem gambling: A community partnership. <i>In proceedings of the 16th National Association for Gambling Studies Conference</i>. Sydney, Australia: National Association for Gambling Studies Inc.</p> <p>14. Wheeler, S., Round, D.K., Wilson, J. (2010). <i>The relationship between crime and gaming expenditure in Victoria: Final report</i>. Prepared by the Centre for Regulation and Market Analysis, School of Commerce, University of South Australia. Victoria, Australia: Office of Gaming and Racing, Department of Justice</p> <p>15. Victorian Auditor General. (2010) <i>Taking Action on Problem Gambling, Victorian Auditor General's Report, July 2010</i></p>
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