

AHPA response to “You win some, you lose more” report

In September 2022, the Standing Committee on Social Policy and Legal Affairs commenced the [inquiry into online gambling and its impacts on those experiencing gambling harm](#). The Australian Health Promotion Association (AHPA®) responded to the inquiry through its [written submission](#), and appearing at a [public hearing](#).

Several AHPA members also co-authored the HPJA editorial [“Time for policies on gambling to benefit health - not the gambling industry”](#) which made a range of recommendations (below):

Recommendations for action on the gambling industry and its products

- 1**
Develop and implement a comprehensive public health framework to prevent gambling harm
A suitably resourced public health framework for preventing gambling harm should be developed in consultation with experts from relevant health areas, including health promotion, and free from gambling industry influence. This framework should outline the key pillars of a comprehensive public health approach. This should incorporate appropriate roles for government health departments, experts and organisations.
- 2**
Eliminate industry influence from research, policy, and practice
Mechanisms should be developed to protect gambling research, policy, and practice from being influenced by the gambling industry, those funded by the gambling industry, or those profiting from the gambling industry. As one immediate priority, universities, health promotion organisations and funders should develop robust prohibited partner policies that prevent engagement with the industry.
- 3**
Address the structural characteristics impeding gambling harm prevention
A national regulator should be tasked with implementing systems to prevent health and social harms associated with products, including both their structural characteristics, and their widespread accessibility in community settings.
- 4**
Enact strong restrictions on gambling marketing
Public policy should take into account the broad range of contemporary gambling marketing tactics, including political donations, corporate social responsibility strategies, and lobbying. Legislation should aim to prevent children and young people from being exposed to gambling marketing. This would entail comprehensive bans on all forms of marketing for gambling products.
- 5**
Implement independent public health centred education programs
Public education programs (including school-based initiatives) should be adequately funded, evidence-based, independent of any gambling industry interests or influence, and designed to prevent gambling harm across the entire community.

On 28 June 2023, the Committee released its report [“You win some, you lose more”](#) proposing 31 recommendations to reduce gambling related harm across the Australian population. **We commend the government for undertaking this inquiry and the Committee for its comprehensive response.** The majority of recommendations show a commitment by the government to enact meaningful reform in the online gambling space with a strong focus on public health driven initiatives aimed at improving customer protections and reducing levels of gambling related harms across communities.

AHPA welcomes the Committee’s recommendations to adopt a national level regulatory response that is appropriately supported by the states and territories. These measures include appointing an Australian Government Minister with sole responsibility for online gambling and establishing national level regulation and a national online gambling regulator responsible for all online gambling licencing and regulation, with a primary focus on reducing gambling related harm. That the Inquiry has set the expectation that the national regulator will operate within a broad suite of powers allowing the appropriate level of monitoring of online gambling

activity, ensuring compliance and enforcing the law with penalties severe enough to be a genuine deterrent to Australian and multinational operators is welcomed.

AHPA agree with the Committee’s comments that the current regulatory framework for online gambling is “complex and fragmented” with the regulation around gambling advertising particularly complex. The phase of recommendations including the prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms; the removal of the exemption for advertising online gambling during news and current affairs broadcasts; and the prohibition of advertising online gambling on commercial radio between 8.30-9.00 am and 3.30- 4.00 pm (school pickup times) will serve to limit the overexposure of gambling advertising across online and traditional platforms including radio and television. Acknowledging that implementation of such reforms can take time, if there is the opportunity to adopt the remaining recommendations more immediately, this would be a welcome outcome.

We were pleased to see the Committee’s recommendation of supporting additional funding for gambling research including access to de-identified data from gambling providers and the acknowledgement of the need for a national led education campaign that seeks to counter the harmful messages of gambling advertising.

Here’s where the Inquiry recommendations align to those suggested by AHPA.

AHPA Recommendations	Inquiry Recommendations
1. Blanket ban across all TV and radio advertising across all time slots.	Recommendations 16 & 26 address gambling advertising
2. Extend restrictions on advertising in public spaces to places where children and adolescents frequent but are not typically known as children’s environments such as outside alcohol and gambling outlets and shopping centres.	Recommendation 26 addresses stadium gambling advertising as part of phase 2: Prohibition on all in-stadia advertising, including logos on players’ uniforms.
3. Involve young people in consultation for developing public health responses to gambling.	Not specifically included.
4. Ban gambling sponsorship at sporting events and on sport uniforms.	Recommendation 26 addresses stadium gambling advertising as part of phase 2
5. Implement tight restrictions for online gambling advertising to prevent exposure to children and young people whilst online.	Recommendation 26 addresses gambling advertising
6. Provide resources for public health-led research into gambling harms free from industry influence.	Recommendation 4 addresses a national public education campaign
7. Establish a national public health-led coalition to reduce gambling harms with a focus on evidence informed policy, regulation, and service delivery	There is a strong national focus across multiple recommendations

AHPA is pleased to see positive action taken to reduce gambling related harm in the community. AHPA would welcome the opportunity to have our experienced health promotion workforce engaged throughout the development and implementation of these recommendations.

For more information on the recommendations please view the report [here](#).