



28 April 2021

Royal Commission into the Casino Operator and Licence
 contact@rccol.voc.gov.au

Connect Health & Community is a not-for-profit community health service, helping residents in the south eastern suburbs of Melbourne.

We have been providing health and social services to the local area for more than 40 years, with services including; Counselling, Dental, Diet and Nutrition, Gambler's Help, Health Promotion, Hydrotherapy, Nursing, Occupational Therapy, Physiotherapy, Podiatry, Children's Speech Pathology, Community Transport, Youth Support, VicRoads' Safe Driving Program, Social Groups and Activities and NDIS services.

The Gambler's Help Southern Program has been supporting the local community since 1995 and is the largest provider of problem gambling support services in Victoria. We provide services across 11 local government areas.

The focus of our submission relates to Part D of the Royal Commission Terms of Reference: "Whether it is in the public interest for Crown Melbourne to continue to hold the casino licence in Victoria".

The gambling industry has a number of legislative and regulatory oversight.

The Gambling Regulation Act 2003 governs the conduct of gambling activities in Victoria, other than Crown Casino. The objective of the Act is to foster responsible gambling in order to minimise harm caused by gambling and accommodate those who gamble without harming themselves or others. Crown Casino sits outside of this Regulation.

The Victorian Responsible Gambling Foundation (VRGF) is a statutory authority created by the Victorian Parliament specifically to address the challenge of gambling harm in the Victorian Community. The VRGF was brought into effect by the Victorian Responsible Gambling Foundation Act 2011 and is accountable to the Minister for Consumer Affairs, Gambling and Liquor Regulation. Its role includes raising awareness to reduce harm from gambling. Crown Casino operations are not within the mandate of the VRGF.

Gambling Legislation (Pre-Commitment and Loyalty Scheme) Regulations Act 2014 includes gaming machines at Crown Casino yet the oversight authority (VRGF) does not have influence over this. Prevention strategies such as pre-commitment and self-exclusion could be strengthened by uniformity of approach and operational oversight.

Crown has ethical and legal obligations to keep the community safe from gambling harm. These include:

- Intervening when someone is showing visible signs of distress



- Offering trained professionals to provide support
- Providing and enforcing a self-exclusion program
- Keeping children off the gambling room floor
- Stopping intoxicated people from gambling
- Keeping illegal activities off the gambling floor, such as the offering of credit to gamble
- Providing responsible gambling programs, services and resources

There is also a community expectation that Crown will not entice people to gamble more than intended, or target vulnerable members of the community to gamble.

At present the oversight of these obligations are through the Victorian Commission for Gambling and Liquor Regulation (VCGLR) an independent statutory authority that regulates Victoria's gambling and liquor industries. Again the enforcement and oversight of prevention strategies to reduce the harm caused by gambling could be strengthened by uniformity of approach and operational oversight between the VCGLR and the VRGF.

The public interest is not well served under the current regulatory framework where opportunities are created to do the minimum rather than be encouraged and expected to support the wellbeing of its patrons.

Please do not hesitate to contact me if you require any further clarification.

Regards,

A handwritten signature in black ink, appearing to read "Amanda Murphy", with a large, stylized flourish at the end.

Amanda Murphy
Chief Executive Officer