



women's health  
goulburn north east  
*challenging inequity, embracing diversity*

25 March 2019

Victorian Commission for Gaming and Liquor Regulation  
GPO 1988  
Melbourne VIC 3001

Dear Commissioners,

**RE: Submission to the application by Hogan's Hotel for a licence to install additional EGMs**

Women's Health Goulburn North East recommends that VCGLR decline the application of Hogan's Hotel for an expansion of their gaming licence.

Our reasons are set out in the submission below.

WHGNE seeks leave to present to the VCGLR on this submission.

Sincerely,

Susie Reid  
Executive Officer

## **Women’s Health Goulburn North East**

Women’s Health Goulburn North East (WHGNE) aims to positively transform the health, wellbeing and safety of all women and girls across the Goulburn and North East region. We specialise in the prevention of violence against women, sexual and reproductive health, gender equity and economic empowerment.

WHGNE provide a variety of health promotion services, training and research across our priority areas. We advocate on behalf of women to governments, organisations and communities to ensure the safety, health and wellbeing across our region. Through our work we empower women to influence change in all settings. We encourage organisations to be leaders through the development of research-based programs, policies and best practice to ensure the continual advancement of gender equity. WHGNE collaborates across all health, community, organisation and government settings to advocate for and ensure that women’s health and social status is a priority.

As the rural and regional specialist women’s health service for Victoria’s Goulburn and Ovens Murray region, WHGNE and our strategic partners focus on the continual development of wellbeing, health and safety of women from diverse backgrounds. We are experts in understanding and consulting on the voices and needs of regional women who are considered to be some of the most “marginalised”, “hard to reach” and “at risk” members of the communities.

Our work covers the municipalities of Alpine, Benalla, Greater Shepparton, Indigo, Mansfield, Mitchell, Moira, Murrindindi, Strathbogie, Towong, Wangaratta and Wodonga. We have an ongoing commitment to:

- Building, supporting and promoting collaborative partnerships and networks which improve services and programs for women
- Development and delivery of education workshops
- Conducting research and the practical translation into tailored resources that specifically benefit women and girls
- Campaigning and advocating for social, economical and environmental change to improve women’s health and wellbeing

## **WHGNE’s work in family violence and economic empowerment**

WHGNE recognises the importance of women’s economic empowerment in the improvement of health and wellbeing to achieve gender equality. We work directly with women, services and key partners to conduct research, deliver training and develop resources to progress women’s financial wellbeing.

Along with our key partners and on-going research we recognise the long-term and complex nature of preventing violence against women and their children. Over many years we have worked closely with Women’s Health in the North undertaking research and developing essential resources across the prevention of violence against women, economic empowerment and gender equity.

Recent statistics show that 43.5% of women in the Mitchell Shire earn below minimum wage<sup>1</sup>. Across Mitchell Shire, less women work full time, with 41.2% of women over 15 in full time employment<sup>1</sup>. Men make up the majority of the full-time work force in with 73.3% in full time employment<sup>1</sup>. Full time and part time averages have not changed much since the 2011 census. This means that when women retire, they have 48% less in their superannuation fund than their male counterparts<sup>2</sup>.

Women's majority share of unpaid caring and domestic work is one of many factors which influence the gender pay gap<sup>3</sup>. Women complete the majority of unpaid domestic work in Mitchell. 25% of women complete 15+ hours of unpaid domestic work, which is considerably higher than the 8.1% of men who complete unpaid domestic work<sup>1</sup>.

Gender inequities, including those mentioned above, contribute to family violence and violence against women and their children. These gender inequities make women more financially insecure and vulnerable to disrespect and violence<sup>4</sup>.

### **Gambling and family violence as a public health issue**

Taking a public health approach to the wellbeing of communities recognises the importance of awareness, education, prevention, partnerships, policy, research and advocacy in order to achieve positive health outcomes for men, women and children. Family violence has been recognised as a public health issue, with the Victorian Government taking direct steps to ensure the elimination of family violence and violence against women and their children.

The Mitchell Shire Council has recognised family violence as a community priority in their Municipal Public Health and Wellbeing Plan (2018-2021). This includes working in partnership with key stakeholders and agencies, including WHGNE, to reduce the incidence of family violence.

In addition to the prevention of family violence, local governments play a key role in the development and implementation of Electronic Gaming Machine (EGM) policies, which aim to improve the health and wellbeing of all their community members. A number of local councils have shown strong leadership in this policy area and recognise gambling as a key public health issue across their local area. These councils are aware of the relationship between family violence and gambling harm.

Mitchell Shire Council have an EGM Policy and associated strategies which aim to prevent and reduce gambling in the community. This document clearly states that Mitchell Shire Council:

- *“supports the Victorian State Government cap of 239 EGM licences in Mitchell Shire intended to protect vulnerable communities from the harmful effects of gambling. Council is opposed to any increase to the existing cap”<sup>5</sup>*
- *“will not support new EGM venues, additional licences and the transfer of EGM licence between venues unless satisfied that the social and Economic Impact Assessment (SEIA) undertaken by the applicant clearly shows that there will be ‘no net detriment’ to the wellbeing of the community in which the premises is located.”<sup>5</sup>*

Family violence and gambling have both been identified as important public health and social issues that require leadership and commitment to a prevention approach that stops further ill health and detrimental social outcomes for communities.

### **Research linking problem gambling, EGM accessibility and family violence**

International and national research concludes that gambling is a complex and contributing factor in family violence<sup>6</sup>. Research conducted by Women's Health in the North (WHIN) in partnership with Gambler's Health Northern focused on the link between family violence and gambling, which also supported the strong correlation between gambling and family violence.

Gambling and family violence research found that:

- Family violence is three time more likely to occur in families experiencing gambling harm compared with those experience no harm from gambling<sup>7</sup>.
- Individuals who have problems with gambling have been found to be more likely (than those who don't) to be victims and perpetrators of family violence<sup>8</sup>
- One third of people with gambling problems report experiencing intimate partner violence<sup>8</sup>
- One third of individuals are perpetrators of intimate partner violence<sup>9</sup>
- More than half of people with gambling problems report perpetrating physical violence against their children<sup>9</sup>
- There is a direct positive correlation between the number of EGMs in the community and the number of family violence incidents reported to police<sup>10</sup>
- Postcodes with no EGM reported less family violence incidence<sup>10</sup>
- Anecdotal evidence from Gambler's Help and family violence workers report that women who have experienced family violence visit gaming venues to escape violence in their home and are more likely to then develop gambling problems<sup>11,12</sup>

### **Prevalence of family violence in Mitchell Shire**

According to recent data released by Crime Stats Victoria, Mitchell Shire currently ranks 8<sup>th</sup> out of 79 shires in Victoria for family violence incidence rates for the 2017/18 period, with a rate of 22.22 incidence for 1,000 people. This is nearly double the state average of 12.4 incidences<sup>13</sup>.

It is widely understood that many women who experience family violence do not report to the police. Therefore, the family violence incidents for Mitchell Shire are likely to underrepresent the extent of the problem. This data strongly indicates that there are unacceptably high rates of family violence across this local government area.

### **Cost of family violence**

Research shows that violence against women and their children costs Australia over \$21.7 billion annually, with over one third of this financial burden being carried by governments<sup>14</sup>.

Broken down this burden is as follows:

- The cost of pain, suffering and premature mortality constitutes the largest proportion of the total cost of all violence at 48 per cent, equating to \$10.4 billion.
- Governments, both State and Commonwealth then bear 36 per cent or \$7.8 billion in order to deliver health services, criminal justice and social welfare for victims.
- Economically, \$3.4 billion is lost either due to victims or other members of society funding for their own services or due to lost opportunity costs.
- The annual cost of each women experiencing violence is estimated to be \$26,780.20 per year.

This report, *A high price to pay: the economic case for preventing violence against women*, states that if no further action is taken to prevent violence against women these costs will increase to an estimated \$323.4 billion by 2045<sup>14</sup>. Increasing the number of EGMs in Victoria is likely to contribute to further financial burden resulting from family violence.

### **Impact of the expansion of the Hogan's Hotel Gaming licence**

WHGNE recommends that the VCGLR adopt a cautionary approach when considering the introduction of more EGMs to the Wallan community. This recommendation is made with the following in mind:

- Problem gambling is associated with family violence. EGMs have been recognised as the most heavily used gaming platform associated with gambling related harm. The introduction of more EGMs will not only increase gambling related harm, but also increase stress, relationship difficulties and financial hardship, all of which are strongly linked to family violence.
- EGM numbers are positively correlated with family violence incidents. An increase in EGMs in the Mitchell shire area will result in an increase of family violence incidences in the Wallan community.
- Victorian Government has committed to implementing the recommendations identified in the Royal Commission on Family Violence, including the investment in prevention programs. Increasing the availability and access to EGM contradicts this commitment to creating strong, safe, and healthy communities. What level of additional family violence is the Commission willing to find acceptable in the context of undertaking an assessment as to the benefits and disadvantages of development in this area, especially given the current impacts of family violence in this community?

#### **Proposed benefits of the gaming licence expansion**

WHGNE notes the applicant has stated that the addition of EGMs will result in the improvement of Hogan's Hotel facilities and a flow on of benefits into the wider community.

WHGNE does not consider these improvements to be of significant benefit to the community and advises the Commission to recognise that community groups and other local associations are unwilling to attend venues which support and normalise gambling/drinking behaviours and that these venues do not support good public health practice. WHGNE is aware that specific marketing of the venue will target marginalised and at-risk members of the community which are vulnerable to gambling. Therefore WHGNE, considers that any and all promotion and marketing materials produced by Hogan's Hotel will contribute to and magnify family violence and gambling harms.

WHGNE also notes that the addition of local jobs as a result of increasing EGMs does not outweigh the significant and long-term public health costs to families and communities caused as a direct response to gambling and its associated harms.

Accordingly, WHGNE recommends that the Commission:

- Familiarise itself with the family violence data from the Mitchell area
- Consider any such costs in its deliberations on the net detriment test
- Explicitly articulate how its determination has considered this matter, including how it is consistent with the Victorian Government's commitment to prevent family violence.

## **Conclusion**

WHGNE is **directed by evidence** which clearly states that **increasing EGMs in the Mitchell Shire Council will result in an increase in family violence incidents** and increase financial hardship for women and families.

Increasing EGM in the Mitchell Shire Council **contradicts the Victorian Government's commitment to preventing against women and children.**

WHGNE is of the view that the **proposed benefits of additional EGMs at Hogan's Hotel does not in any way justify the risk** to the safety, health and wellbeing of women and children.

WHGNE is open to future and detailed discussion with the Commission relating to any of the evidence included in this submission.

## References

- <sup>1</sup> Australian Bureau of Statistics. *Census of Population and Housing*. 2016. <http://www.abs.gov.au/ausstats/abs@.nsf/mf/3301.0> (accessed 22 March 2019)
- <sup>2</sup> Claire, R. An Update on the Level and Distribution of Retirement Savings (2014)
- <sup>3</sup> WGEA data explorer. *Gender Equality Overview*. 2017. <http://data.wgea.gov.au/overview> (accessed 22 March 2019)
- <sup>4</sup> Our Watch, Australia's National Research Organisation for Women's Safety (ANROWS) and VicHealth (2015) *Change the story: A shared framework for the primary prevention of violence against women and their children in Australia*, Our Watch, Melbourne, Australia.
- <sup>5</sup> Mitchell Shire Council, Electronic Gaming (EGM) Policy, [https://mitchell-shire-council-public-assets.s3.amazonaws.com/general-downloads/MSC\\_Electronic\\_Gaming\\_Machine\\_EGM\\_Policy.pdf](https://mitchell-shire-council-public-assets.s3.amazonaws.com/general-downloads/MSC_Electronic_Gaming_Machine_EGM_Policy.pdf)
- <sup>6</sup> Korman, L., Collins, J., Dutton, D., Dhayanathan, B., Littman-Sharp, N., Skinner, S. (2008) "problem gambling and intermit partner violence", *Journal of Gambling studies*, 24(1), pp.13-23.
- <sup>7</sup> Dowling, N. A., Ewin, C., Youssef, G. J., Thomas, S. A., & Jackson, A. C. Problem gambling and family violence: Findings from a population representative community study.
- <sup>8</sup> Suomi, A., Jackson, A.C., Dowling, N.A., Lavis, T., Patford, J., Thomas, S.A, Cockman, S. (2013). Problem gambling and family violence: family member reports of prevalence, family impacts and family coping, *Asian Journal of Gambling Issues and Public Health*, 3, (13), pp. 1-15
- <sup>9</sup> Dowling, N., Suomi, A., Jackson, A., Lavis, T., Patford, J., Cockman, S., Abbott, M. (2014). Problem Gambling and Intimate Partner Violence: A systematic review and Meta-Analysis. *Trauma, Violence, and Abuse*, p.1-19.
- <sup>10</sup> Markham, F., Doran, B., Young, M., The relationship between electronic gaming machine accessibility and police-recorded domestic violence: A spatio-temporal analysis of 654 postcodes in Victoria, Australia, 2005–2014, *Social Science & Medicine* (2016), doi: 10.1016/j.socscimed.2016.06.008.
- <sup>11</sup> Women's Information and Referral exchange. *Opening doors to women: Assistance for organisations working with women experiencing gambling and isolation*. Melbourne: WIRE. No date (research conducted 2007).
- <sup>12</sup> Rintoul, A., Delaquiere, J., Thomas, A., Gambling in Suburban Australia: summary findings, Australian Gambling Research Centre: Melbourne, *March 2017*.
- <sup>13</sup> Crime Statistics Agency, *Family Violence Data Portal* (webpage) 2018, <https://www.crimestatistics.vic.gov.au/family-violence-data-portal/family-violence-data-dashboard/victoria-police> (accessed 21 March 2019)
- <sup>14</sup> PricewaterhouseCoopers Australia, A high price to pay: the economic case for preventing violence against women, 2015, <https://www.pwc.com.au/publications/economic-case-preventing-violence-against-women.html> (accessed 21 March 2019)



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