



NACCHO

National Aboriginal Community
Controlled Health Organisation
Aboriginal health in Aboriginal hands

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Inquiry into online gambling and its impacts on those experiencing gambling harm

**Submission to the House of
Representatives Standing
Committee on Social Policy and
Legal Affairs**

[November 2022]

ABOUT NACCHO

NACCHO is the national peak body representing 144 Aboriginal Community Controlled Health Organisations (ACCHOs). We also assist a number of other community-controlled organisations.

The first Aboriginal medical service was established at Redfern in 1971 as a response to the urgent need to provide decent, accessible health services for the largely medically uninsured Aboriginal population of Redfern. The mainstream was not working. So it was, that over fifty years ago, Aboriginal people took control and designed and delivered their own model of health care. Similar Aboriginal medical services quickly sprung up around the country. In 1974, a national representative body was formed to represent these Aboriginal medical services at the national level. This has grown into what NACCHO is today. All this predated Medibank in 1975.

NACCHO liaises with its membership, and the eight state/territory affiliates, governments, and other organisations on Aboriginal and Torres Strait Islander health and wellbeing policy and planning issues and advocacy relating to health service delivery, health information, research, public health, health financing and health programs.

ACCHOs range from large multi-functional services employing several medical practitioners and providing a wide range of services, to small services which rely on Aboriginal health practitioners and/or nurses to provide the bulk of primary health care services. Our 144 members provide services from about 550 clinics. Our sector provides over 3.1 million episodes of care per year for over 410,000 people across Australia, which includes about one million episodes of care in very remote regions.

ACCHOs contribute to improving Aboriginal and Torres Strait Islander health and wellbeing through the provision of comprehensive primary health care, and by integrating and coordinating care and services. Many provide home and site visits; medical, public health and health promotion services; allied health; nursing services; assistance with making appointments and transport; help accessing childcare or dealing with the justice system; drug and alcohol services; and help with income support. Our services build ongoing relationships to give continuity of care so that chronic conditions are managed, and preventative health care is targeted. Through local engagement and a proven service delivery model, our clients 'stick'. Clearly, the cultural safety in which we provide our services is a key factor of our success.

ACCHOs are cost-effective. In 2016, a cost-benefit analysis of the services provided by Danila Dilba to Aboriginal and Torres Strait Islander people in the Greater Darwin region was undertaken by Deloitte Access Economics. The findings demonstrated that each dollar invested in the health service provides \$4.18 of benefits to society. ACCHOs are also closing the employment gap. Collectively, we employ about 7,000 staff – 54 per cent of whom are Aboriginal or Torres Strait Islanders – which makes us the third largest employer of Aboriginal or Torres Strait people in the country.

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Recommendations

NACCHO recommends:

1. the four Priority Reform Areas of the *National Agreement on Closing the Gap* be fully implemented to address underlying structural barriers that impact the disproportionately high rates of problem gambling among Aboriginal and Torres Strait Islander people;
2. resourcing of research into the nature and extent of online gambling's contribution to the harm that problem gambling causes to Aboriginal and Torres Strait Islander people;
3. greater resourcing for co-designed, culturally safe awareness-raising campaigns addressing problem gambling, including online gambling, for Aboriginal and Torres Strait Islander people;
4. that new resourcing be provided to ACCHOs nationally to develop and provide culturally safe supports for problem gambling;
5. that new resourcing be provided to Aboriginal and Torres Strait Islander Registered Training Organisations (ACCRTOs) to develop specialised, accredited problem-gambling treatment training for Aboriginal and Torres Strait Islander health practitioners and workers;
6. that the updated *National Alcohol and Other Drug Workforce Development Strategy 2015-18* supports ACCHOs and ACCRTOs to develop and implement workforce development strategies to address problem gambling experienced by Aboriginal and Torres Strait Islander people;
7. that all mainstream gambling and online gambling awareness programs contain specialised, culturally safe services for Aboriginal and Torres Strait Islander people that have been co-designed through equal partnerships with Aboriginal and Torres Strait Islander people and organisations;
8. that all mainstream gambling and online gambling awareness training programs and website advice provide pathways or links to programs delivered by ACCHOs;
9. that the *National Consumer Protection Framework for Online Wagering* be reviewed and updated to include a ban on credit card use for online wagering, and to include culturally and linguistically appropriate statements on wagering activity for Aboriginal and Torres Strait Islander people; and
10. that significantly stronger government regulation be introduced around advertising of online gambling.

Introduction

NACCHO welcomes the opportunity to provide a submission to The Standing Committee on Social Policy and Legal Affairs on the Inquiry into online gambling and its impacts on those experiencing gambling harm. This submission will focus on Aboriginal and Torres Strait Islander peoples and online gambling harm, the need for community-controlled gambling services and gambling support programs that are culturally safe.

Gambling is viewed as a normal social and cultural activity by many Aboriginal and Torres Strait Islander people. Macassan traders and sailors introduced many northern Indigenous groups to cards and card gambling for recreation and economic exchange. Card games and gambling have evolved and spread to become an accepted part of Aboriginal and Torres Strait Islander culture. Community card games involving gambling may redistribute resources within communities. Sometimes, winners are expected to keep playing to allow losers an opportunity to win back a portion for living expenses.¹

However, commercial and newer forms of commercial gambling such as online gambling, extract money from communities, and social restraints such as exist around card playing may be lower due to the isolated, individualised nature of online gambling. Moreover, the high use of mobile phones amongst Aboriginal and Torres Strait Islander people exacerbates online gambling use and availability of online gambling services.

Commercial gambling leads to devastating health impacts, including poor mental health, stress, trauma, grief, depression, as well as the health implications associated with poverty – substandard housing, homelessness, inadequate nutrition and food insecurity, shorter life expectancy and higher death rates. The community-controlled sector and social and emotional wellbeing programs are best equipped to address the cultural and social determinants of health and address the impacts of online gambling.

High prevalence of problem gambling

Data on Aboriginal and Torres Strait Islander gambling is both limited and dated, with no reliable data relating to online gambling. That said, the expansion of commercial gambling (i.e., electronic gaming machines, wagering on horse and dog races, sports betting, keno, bingo, lotto and lottery-type games, instant scratch tickets, poker tournaments, and casino table games) over the last 30 years has corresponded with the expansion of gambling participation by Aboriginal and Torres Strait Islander people to levels well above those of the non-Indigenous population.²

A 2011 survey found that 80% of Aboriginal and Torres Strait Islander participants reported having used commercial forms of gambling in the previous year, compared to 64% of non-Indigenous respondents nationally. The highest participation rate was for electronic gambling machines (EGMs). The proportion of weekly EGM players was six times higher among the Aboriginal and Torres Strait Islander sample than among the general Australian population.³

The more recent expansion and influence of online gambling has likely exacerbated this gap. Online gambling among Aboriginal and Torres Strait Islander people is likely significantly higher than for non-Indigenous Australians. Research is required to gain data on the extent of this gap, and to examine gambling prevalence, as well as the impacts of online gambling.

¹ Hing, N., Breen, H., Gordon, A., & Russell, A. (2014). Risk factors for gambling problems among Indigenous Australians: An empirical study. *Journal of Gambling Studies*, 30(2), 387–402.

² Aboriginal Health & Medical Research Council of New South Wales (AHMRC). (2007). *Pressing problems: Gambling issues and responses for NSW Aboriginal communities*. Sydney: AHMRC.

³ Ibid. Hing, N., Breen, H., Gordon, A., & Russell, A. (2014).

NACCHO recommends comprehensive data on Aboriginal and Torres Strait Islander gambling, and online gambling specifically, be collected and made available to Aboriginal and Torres Strait Islander community-controlled health organisations.

Similar indicators of high gambling involvement for First Nations people in North America and New Zealand affirm a connection between high rates of gambling and socio-economic disadvantage.⁴ British colonisation from 1788 resulted in dispossession of Aboriginal and Torres Strait Islander land occupied for up to 60,000 years. The structural inequities that continue today have led to a high burden of ill-health, disability, poverty, unemployment, social problems and poor living conditions.⁵ For Aboriginal and Torres Strait Islander people, gambling provides a diversion from problems and hardship.⁶

To address the 'gambling gap' between Aboriginal and Torres Strait Islander and non-Indigenous Australians, broader, structural change is required.

The National Agreement on Closing the Gap

In July 2020 the Australian Government, all state and territory governments, and the Coalition of Peaks signed the National Agreement on Closing the Gap (National Agreement). The reforms and targets outlined in the National Agreement seek to overcome the inequality experienced by Aboriginal and Torres Strait Islander people, and achieve life outcomes equal to all Australians. All governments have committed to the implementation of the National Agreement's four Priority Reform Areas, which seek to bring about structural change to affect ways in which governments work with Aboriginal and Torres Strait Islander organisations, communities and individuals. The four Priority Reforms are:

Priority Reform Area 1 – Formal partnerships and shared decision-making

This Priority Reform commits to building and strengthening structures that empower Aboriginal

and Torres Strait Islander people to share decision-making authority with governments to accelerate policy and place-based progress against Closing the Gap.

Priority Reform Area 2 – Building the community-controlled sector

This Priority Reform commits to building Aboriginal and Torres Strait Islander community-controlled sectors to deliver services to support Closing the Gap. In recognition that Aboriginal and Torres Strait Islander community-controlled services are better for Aboriginal and Torres Strait Islander people, achieve better results, employ more Aboriginal and Torres Strait Islander people and are often preferred over mainstream services.

Priority Reform Area 3 – Transformation of mainstream institutions

This Priority Reform commits to systemic and structural transformation of mainstream government organisations to improve to identify and eliminate racism, embed and practice cultural safety, deliver services in partnership with Aboriginal and Torres Strait Islander people, support truth telling about agencies' history with Aboriginal and Torres Strait Islander people, and engage fully and transparently with Aboriginal and Torres Strait Islander people when programs are being changed.

Priority Reform 4 – Sharing data and information to support decision making

⁴ Gray, R. (2011). *New Zealanders' participation in gambling: Results from the 2010 Health and Lifestyles Survey*. Wellington: Health Sponsorship Council.

⁵ Australian Bureau of Statistics. (2012). *Census of population and housing: Counts of Aboriginal and Torres Strait Islander Australians, 2011: Catalogue 2075.0*. Canberra: ABS.

⁶ Hing, N., Breen, H. (2014). *Indigenous Australians and Gambling*. AGRC Discussion Paper No2, Australian Gambling Research Centre, Australian Institute of Family Studies, Canberra

This Priority Reform commits to shared access to location-specific data and information (data sovereignty) to inform local-decision making and support Aboriginal and Torres Strait Islander communities and organisations to support the achievement of the first three Priority Reforms.

NACCHO recommends the four Priority Reform Areas of the National Agreement on Closing the Gap be fully implemented to address underlying structural barriers that affect the disproportionately high rates of problem gambling among Aboriginal and Torres Strait Islander people.

Problem gambling programs and treatments should be developed through equal partnerships with Aboriginal and Torres Strait Islander people, communities and organisations. Programs and treatments should be culturally safe and free from racism. Resources for programs and treatments should be led by the Aboriginal and Torres Strait Islander community-controlled sector. To achieve this, investment is needed to build the capacity of the Aboriginal and Torres Strait Islander community-controlled sector, in alignment with Priority Reform 2 of the National Agreement. Disaggregated data on Aboriginal and Torres Strait Islander problem gambling should be shared with Aboriginal and Torres Strait Islander people, communities and the community-controlled sector.

High rate of harm from all forms of gambling

Among those Aboriginal and Torres Strait Islander people who gamble, nearly two-thirds have been found to be at risk of problem gambling.⁷ Data limits, however, prevent insights into how much online gambling is contributing to gambling harm experienced by Aboriginal and Torres Strait Islander people. It is highly likely, however, that it is exacerbating the existing 'gambling gap'.

Past research shows most Aboriginal and Torres Strait Islander people experiencing a gambling problem have an increased level of financial hardship. They then either put pressure on family and friends to assist them financially or simply go without. Nearly one-half do not pay, or put off, urgent bills and argue about gambling within their household.⁸

Smaller groups report incidents of violence, separation, divorce, job losses, or eviction as a result of gambling. Other negative impacts – personal, relationship, family, community, legal and housing – were more prevalent among Aboriginal and Torres Strait Islander problem gamblers, with effects flowing on to other relatives and friends.⁹

Harm from all forms of gambling, therefore, entrenches already existing poverty among Aboriginal and Torres Strait Islander people. Exacerbated poverty, in turn, becomes an ever-more powerful social determinant for other outcomes, such as poor health and homelessness.

NACCHO recommends resourcing of research into the nature and extent of online gambling's contribution to the harm gambling does to Aboriginal and Torres Strait Islander people and its impact on health.

Help-seeking

Help-seeking rates for gambling problems among Aboriginal and Torres Strait Islander gamblers are low. Almost half (44%) of regular Aboriginal and Torres Strait Islander gamblers do not think they have a gambling problem.¹⁰ Only 5.4% of Aboriginal and Torres Strait Islander gamblers receive any kind of gambling help, including from informal sources such as family and friends.¹¹ Professional help appears to be sought only after other options have been exhausted.

⁷ Ibid. Hing, N., Breen, H., Gordon, A., & Russell, A. (2014).

⁸ Ibid. Hing, N., Breen, H. (2014).

⁹ Hing, N., Breen, H., Gordon, A., & Russell, A. (2013). *Gambling harms and gambling help-seeking amongst Indigenous Australians*. Journal of Gambling Studies. 3

¹⁰ Ibid. Hing, N., Breen, H., Gordon, A., & Russell, A. (2014).

¹¹ Ibid. Hing et al (2013).

Seeking help among kin within Aboriginal culture is an important part of meeting reciprocal obligations. However, help for problem gambling may not be forthcoming where family and friends are gamblers themselves. Those seeking help often encounter other gamblers' non-recognition of the problem. Other barriers to help seeking include the inappropriateness of suggesting that an Elder needs gambling help, due to cultural respect for Elders.¹²

NACCHO recommends greater resourcing for co-designed, culturally safe awareness-raising and behavioural change campaigns addressing problem gambling, including online gambling, among Aboriginal and Torres Strait Islander people.

Self-help and family support

Where Aboriginal and Torres Strait Islander gamblers are aware that they are experiencing problem gambling, they indicate a preference for trying to help themselves. Self-help strategies are used to avoid the shame and stigma associated with problem gambling.¹³ While conventional strategies might encourage taking up new hobbies, learning new skills, and avoiding gambling venues and other gamblers, strategies that are culturally appropriate and culturally safe for Aboriginal and Torres Strait Islander people need to be co-designed with Aboriginal and Torres Strait Islander people. These strategies may include cultural practices specific to local people and communities. Social and Emotional Wellbeing (SEWB) programs led by the community-controlled sector should play a strong role in these strategies. SEWB programs play a valuable role in the support of Aboriginal and Torres Strait Islander people, as online gambling at harmful levels can lead to devastating health outcomes, including poor mental health.

Informal help provided by family, friends and community leaders is a second preference but still sought. Conventional strategies might include emotional care, food and shelter, and various forms of 'tough love' such as refusing loan requests and hiding debit/credit cards. However, strategies that are culturally appropriate and culturally safe for Aboriginal and Torres Strait Islander people need to be co-designed with Aboriginal and Torres Strait Islander people and be place based. Again, these strategies may include cultural practices specific to local people and communities.

Aboriginal and Torres Strait Islander Community-controlled programs

Treatment for problem gambling cannot be undertaken in isolation from treatments addressing the range of other challenges and disadvantages faced by Aboriginal and Torres Strait Islander people. ACCHOs provide a range of primary health interventions, education and community programs that can complement problem gambling treatment programs. ACCHOs are uniquely placed to provide holistic, trauma-informed, and culturally appropriate services.

Research has found that treatment programs for Aboriginal and Torres Strait Islander people are more effective if they are co-designed and implemented with local communities, are culturally safe, and employ Aboriginal and Torres Strait Islander staff. Community-led programs and strategies have been shown to generate greater engagement, support and leadership; they provide local employment and training and have a sustained long-term impact. Community-led program development is more flexible and allows adequate time for consultation and data collection.¹⁴

Problem-gambling services designed and provided by Aboriginal and Torres Strait Islander community-controlled organisations are emerging and provide unique models of care for Aboriginal and Torres Strait Islander people experiencing problem gambling. They include:

¹² Breen, H., Hing, N., Gordon, A., & Holdsworth, L. (2013). Indigenous Australians and their gambling help-seeking behaviour. In Y. Baek (Ed.), *Psychology of gaming: New research* (pp. 93–120). Hauppauge NY: Nova Science Publishers.

¹³ Ibid. Breen et al (2013)

¹⁴ Ibid. Hing, N., Breen, H. (2014).

- Rumbalara Aboriginal Co-operative;¹⁵
- Gippsland and East Gippsland Aboriginal Co-operative;¹⁶
- Victorian Aboriginal Health Service;¹⁷
- Mallee District Aboriginal Services;¹⁸
- Mungabareena Aboriginal Corporation;¹⁹ and
- Strong Brother Strong Sister.²⁰

NACCHO recommends that new resourcing be provided to ACCHOs nationally to develop and provide supports for Aboriginal and Torres Strait Islander people experiencing problem gambling.

Workforce development

To support ACCHOs provide problem-gambling treatments and services, the capacity and capabilities of Aboriginal and Torres Strait Islander health workers and Aboriginal and Torres Strait Islander health practitioners must be accordingly enhanced. ACCHO's SEWB teams will be critical here – the mental health and counselling services they provide are pivotal to gambling support, as gambling harm is closely correlated with mental health issues. Doing so should primarily focus on devising accredited problem-gambling skill-set training and non-accredited short courses to be delivered by Aboriginal and Torres Strait Islander Registered Training Organisations (ACCRTOs).

NACCHO recommends new resourcing be provided to ACCRTOs to develop culturally appropriate accredited problem-gambling treatment training skill sets and non-accredited training for Aboriginal and Torres Strait Islander health workers and practitioners.

NACCHO recommends an updated *National Alcohol and Other Drug Workforce Development Strategy 2015-18* supports and funds ACCHOs and ACCRTOs to develop and implement workforce development strategies and training to address problem gambling experienced by Aboriginal and Torres Strait Islander people.

Mainstream services

Questions have been raised around the cultural appropriateness and cultural safety of mainstream online and telephone services, peer support groups, and non-Indigenous help services.²¹ Services need to provide specialised advice and treatments for Aboriginal and Torres Strait Islander people experiencing problem gambling. Specialised advice and treatments, however, should be culturally safe and co-designed with Aboriginal and Torres Strait Islander people, communities and organisations. Where this has been the case, it should be clearly stated but also demonstrated to be the case, with explicit endorsements from Aboriginal and Torres Strait Islander community-controlled organisations.

Some mainstream sites, such as Gambler's Help, link to Aboriginal and Torres Strait Islander organisations that provide dedicated gambling help, and this is commended.²²

NACCHO recommends that all mainstream government-funded gambling and online gambling awareness training programs and website advice provide pathways or links to programs delivered by ACCHOs; and

¹⁵ [Rumbalara Aboriginal Co-operative](#) web page, accessed 10 November 2021

¹⁶ [Gippsland and East Gippsland Aboriginal Co-operative](#) web page, accessed 10 November 2021

¹⁷ [Victorian Aboriginal Health Service](#) web page, accessed 10 November 2021

¹⁸ [Mallee District Aboriginal Services](#) web page, accessed 10 November 2021

¹⁹ [Mungabareena Aboriginal Corporation](#) web page, accessed 10 November 2021

²⁰ [Strong Brother Strong Sister](#) web page, accessed 10 November 2021

²¹ Ibid. Breen et al (2013)

²² [Gambler's Help](#) web page, accessed 10 November 2021

NACCHO recommends that all mainstream gambling and online gambling awareness programs contain specialised services for Aboriginal and Torres Strait Islander people that have demonstrably been co-designed through equal partnerships with Aboriginal and Torres Strait Islander people and ACCOs/ACCHOs.

Greater regulation of online gambling

Online gambling is the fastest growing forms of gambling in Australia.²³ Increased availability of online gambling has resulted in a challenge to protect consumers. The National Consumer Protection Framework for Online Wagering in Australia (the Framework)²⁴ aims to minimise gambling harm related to online wagering activity. However, Framework success is unclear.

For example, Measure 2 of the consumer protections refers to payday lenders, and discourages the use of small-amount credit contracts for online wagering. A ban should be introduced, however, to eliminate *all* credit use in online gambling, including use of credit cards. This would benefit Aboriginal and Torres Strait Islander people, among whom greater rates of poverty encourage use of credit.

Measure 7 refers to activity statements, which seek to ensure customers receive meaningful statements on their wagering activity from betting services. However, statement access may not be provided in a culturally appropriate manner, and it is not clear how statements will be understood by Aboriginal and Torres Strait Islander people.

Furthermore, current restrictions do not account for the impacts of advertising through social-media promotions of betting odds, sponsorships and branding. Gambling advertising restrictions introduced by the Australian Communications and Media Authority have been breached by major sports broadcasting channels, and offer vulnerable consumers, such as Aboriginal and Torres Strait Islander people, easy access pathways to online gambling on personal devices. Significantly stronger limits on advertising are needed.

NACCHO recommends that the National Consumer Protection Framework for Online Wagering be reviewed and updated to include a ban on credit card use for online wagering, and to include culturally and linguistically appropriate statements on wagering activity for Aboriginal and Torres Strait Islander people.

NACCHO recommends that significantly stronger government regulation be introduced around online gambling advertising.

²³ Department of Social Services (2017), *Council of Australian Governments Consultation Regulation Impact Statement* Australian Government, Canberra

²⁴ [National Consumer Protection Framework for Online Wagering in Australia - National Policy Statement](#) web page accessed 10 November 2021