



**Public Health Association**  
AUSTRALIA

## **Public Health Association of Australia submission on NSW review of local impact assessment for gaming machines**

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# Introduction

## The Public Health Association of Australia

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public's health in Australia. The PHAA works to ensure that the public's health is improved through sustained and determined efforts of the Board, the National Office, the State and Territory Branches, the Special Interest Groups and members.

The efforts of the PHAA are enhanced by our vision for a healthy Australia and by engaging with like-minded stakeholders in order to build coalitions of interest that influence public opinion, the media, political parties and governments.

Health is a human right, a vital resource for everyday life, and key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people's health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

All members of the Association are committed to better health outcomes based on these principles.

## Vision for a healthy population

A healthy region, a healthy nation, healthy people: living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health for all.

## Mission for the Public Health Association of Australia

As the leading national peak body for public health representation and advocacy, to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

# Preamble

PHAA welcomes the opportunity to provide input to the review of Local Impact Assessments for gaming machines in NSW. The reduction of social and health inequities should be an over-arching goal of national policy and recognised as a key measure of our progress as a society. The Australian Government, in collaboration with the States/Territories, should outline a comprehensive national cross-government framework on reducing health inequities. All public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

## **PHAA Response to the discussion paper**

The current system of measuring risk through banding at the Local Government Area level in NSW will be fundamentally compromised through the reduction in the number of Council areas and should therefore be amended. This presents an opportunity to improve the risk assessment process, and include other measures of risk than are considered under the current system.

When NSW was divided into 42 LGAs, there may have been sufficient granularity within each LGA for appropriate banding to occur. However, with the expansion of boundaries and the reduction to only 19 LGAs, this granularity will be lost. Given the variation within NSW of SEIFA scores in different geographical areas, differentiation among areas is important in this context. If classification of risk by geographical area is to continue, PHAA recommends using Statistical Local Areas (SLAs) within the Australian Standards Geographical Classification<sup>1</sup> to provide a better assessment of risk, as is done in Queensland. This would have the advantage of being consistent with ABS Census data, for local area statistics to assess possible impacts.

The banding system of classification combines a number of different elements – gaming machine density, gaming machine expenditure and SEIFA score – to rank areas according to risk. The considerable variation in these elements within and among different areas of NSW makes the task of rolling the results into one meaningful score difficult to achieve. The system seems confusing and potentially dilutes the category of risk unless the geographical level at which areas are classified is sufficiently small that the variation is minimised. The banding system is also restrictive in elements considered as part of the risk assessment. The criteria are based on harms, rather than prevention. The number of gaming machines may not reflect the level of risk when the social impacts are considered and should be used in conjunction with other measures. For example, the level of risk could be greater in communities less exposed to gaming, or with a population profile that may be affluent but is potentially vulnerable, such as young people. Vulnerabilities should be included as a criteria in the assessment, as part of prevention.

PHAA recommends that the banding system be discontinued, and replaced with social impact assessments (SIAs). The SIA should include a broader range of factors for consideration, including the existing vulnerabilities of the population in the area, and the likely social and economic impacts of the proposed changes. The SIA should include community consultation, similar to the requirements of the Community Impact Assessments in the Northern Territory which require consultation with gambling help providers and other community representatives. This is imperative to ensure opportunity is provided to elicit a range of views.

The concept of the proposal making a 'positive contribution' to the community must be better defined. Currently 'positive contribution' is defined in economic terms and by donation. This seems a somewhat perverse contribution since it may simply 'pay for' the problems the gaming creates. PHAA recommends that development of other forms of contributions to be included in SIAs. These should be able to

demonstrate measurable positive impacts to communities beyond economic terms, for example, how they might contribute to community engagement and cohesion.

PHAA does not support exemptions from the LIA process for additional gaming machines. Where the application involves the transfer of machines from one venue to another within the same SLA, the existing requirements of being able to demonstrate that appropriate harm minimisation and responsible gambling measures are in place at the venue, and that the proposed increase at that venue will result in additional benefits to the community, should remain.

## Conclusion

PHAA supports the review of NSW Local Impact Assessments for gaming machines. The review provides an opportunity to improve the existing assessment process to further improve outcomes for the community.

We are particularly keen that the following points are highlighted:

- The banding system of classification should be replaced by social impact assessments
- Social impact assessments must allow for a broader range of elements to be considered, including the vulnerabilities of the population
- Broad community consultation is essential
- The impact assessment of harm/benefit needs to consider local area needs and a move beyond economic benefits.

The PHAA appreciates the opportunity to make this submission and the opportunity to contribute to the review of local impact assessments for gaming machines in NSW.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.



David Templeman  
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## References

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<sup>1</sup> Australian Bureau of Statistics (2005) Australian Standard Geographical Classification (ASGC) – Electronic Publication 2005. Catalogue number 1216.0, ABS: Canberra.

