

The Commission for Children and Young People and Child Guardian

promoting and protecting the rights, interests and wellbeing of all Queenslanders under 18

Advice to: Queensland Office of Gambling Regulation (QOGR)

Topic: *Evaluation of the Queensland Responsible Gambling Strategy 2008*
Discussion Paper

Date due: 31 July 2008

Thank you for providing the Commission for Children and Young People and Child Guardian (the Commission) with the opportunity to comment on the *Evaluation of the Queensland Responsible Gambling Strategy 2008* (QRGS) Discussion Paper.

The Commission supports the comprehensive application of the Strategy in providing opportunities for increased awareness of responsible gambling and avenues of support for problem gamblers. In response to the Discussion Paper, the Commission has several recommendations that relate to children and young people as they frequently experience negative consequences from the problem gambling of their parents or care givers.

Summary of recommendations:

1. young people and children be able to initiate the exclusion process in relation to their parents or caregivers
2. early intervention programs and support services be made available to the children of problem gamblers
3. the Teaching Resource Kits for young people be evaluated for their effectiveness and use in schools, and strategies to reach young people not in mainstream education considered, and
4. QOGR continue to develop strategic partnerships and connections with the Department of Communities and Indigenous Government Coordinators Office to address gambling issues in Indigenous communities.

What do you think of the Government's recent announcement regarding the enhanced gambling harm minimisation initiative? What other initiatives could the QLD Govt consider to proactively minimise gambling-related harm?

1. The enhanced gambling harm minimisation initiative (the Initiative) is generally well conceptualised with regard to further regulation and a thorough consideration of gaming service stakeholders.

However, the Commission is concerned that the Initiative does not include children and young people in the category of third parties who can exclude a family member from a gaming venue.

In order to minimise gambling-related harm to children and young people, the Commission recommends that any future developments of the Initiative actively consider providing young people and children with the opportunity to exclude a family member from a gaming venue.

The Commission has made this recommendation previously and resubmits it here based on the following:

The Commission for Children and Young People and Child Guardian

promoting and protecting the rights, interests and wellbeing of all Queenslanders under 18

- It is acknowledged that young people are able to access Helpline services regarding a problem gambler in the family but that only provides them with emotional support and does not effect any change in family functioning. In essence, it just provides young people with advice on how to cope. It does not change the behaviour of the problem gambler as their exclusion from a gaming venue/s would. Children and young people in families where gambling is a problem often experience a range of negative consequences, including shouldering family responsibilities such as caring for siblings and/or parents, yet they have no power to change the situation.
- Children and young people have a right to an adequate standard of living, as identified in the *United Nations Convention on the Rights of the Child* (the Convention) which states that every child has the right to “a standard of living adequate for the child’s physical, mental, spiritual, moral and social development”. The Convention also says that “The parent(s) or others responsible for the child have the primary responsibility to secure, within their abilities and financial capacities, the conditions of living necessary for the child’s development” (Article 27 part 1 and 2). If a problem gambler in a household is depriving a young person of one or more of these elements necessary for an adequate standard of living it is the Commission’s view that the young person should have access to third-party exclusion procedures to help them regain an adequate standard of living.

The Commission draws attention to its previous submissions regarding children and young people being able to initiate exclusions and would appreciate the opportunity to be involved in the consultation process of any future developments in this area.

2. Children and young people can be negatively affected by a parent’s problem gambling in the following ways:
 - learning through imitating their parent’s behaviour
 - experiencing higher rates of serious psychosocial maladjustment
 - experiencing higher rates of drug abuse and over-eating, and
 - experiencing higher rates of physical abuse than other children¹.

Because of the above, the Commission recommends that specialised support services and prevention and early intervention programs be provided for children and young people from problem gambling households. Such programs would help to achieve the aims of the QRGS for the long term if implemented effectively and could include education at the point of identification, ongoing support and counselling as appropriate to the children or young people concerned.

How successful do you think the QRGS has been in minimising gambling-related harm?

3. The Commission is not able to comment on the QRGS’ success in minimising gambling-related harm, although it does appear to have been able to achieve a broad distribution of its responsible gambling resources, particularly by distributing the Teaching Resource Kits to every school in Queensland.

¹ *Early Life Course Determinants of Young Adults’ Gambling Behaviour - An Australian Longitudinal Study*, 2006, pp.7&8, funded by QOGR

The Commission for Children and Young People and Child Guardian

promoting and protecting the rights, interests and wellbeing of all Queenslanders under 18

It may be beneficial to evaluate the effectiveness of the kits as the Discussion Paper did not address this matter. Such an evaluation could explore:

- teachers' capacity to deliver the programs and their feedback on the effectiveness of the Teaching Resource Kits
- young peoples' feedback and views on the program - this may also inform future development of the program, and
- involving reformed gamblers in the compilation and delivery of the resources to add to the impact and effectiveness of the proposed future developments of programs.

There may be value in considering strategies for promoting responsible gambling with young people not involved in mainstream education as they currently miss out on any benefits from the Teaching Resource Kits. This group is more likely to be living in disadvantaged circumstances and may therefore be at a greater risk of problem gambling.

One possible way of doing this would be to connect with youth organisations and associated agencies working with children and young people to promote the QRGS. Informed youth workers could provide gambling support and advice to the young people and could also provide information to QOGR about the magnitude of problem gambling in this group and the resources and support needs to help address it.

How can we better develop, promote and provide initiatives to minimise gambling-related harm in regional and remote communities?

4. There is strong anecdotal evidence that illegal and non-regulated gambling is a significant and growing problem in Indigenous communities, particularly remote communities. The impact of this appears to include an increased consumption of alcohol, increased violence and children being left unattended, with a consequent increased risk of abuse and neglect, including not having enough to eat. The extent and impact of problem gambling in remote communities is not well quantified.

The Commission is aware that QOGR has had discussions with the Cherbourg Community through its Negotiation Table in relation to this matter and suggests that this process should be continued in Cherbourg and extended to other communities.

This could be approached by QOGR forging links with the Department of Communities, Aboriginal & Torres Strait Islander Partnerships (ATSIP) and the Indigenous Government Coordinators Office to participate in discussions with other Negotiation Tables to develop local strategies for responsible gambling. A current research project by Southern Cross University *Exploring Indigenous gambling: behaviour, risk factors, consequences and potential interventions* plans to involve several Indigenous communities in Queensland and compare these with Indigenous communities in New South Wales. This study could provide an additional point of connection to inform future developments in reducing illegal gambling in Indigenous communities.

It is acknowledged that QOGR has a focus on gaming regulation, but based on successful implementation of the QRGS to this point, the Commission believes that QOGR is best placed also to effect change in relation to illegal gambling.

The Commission for Children and Young People and Child Guardian

promoting and protecting the rights, interests and wellbeing of all Queenslanders under 18

Addressing this issue is complex and needs to include engagement with the local communities so that strategies generally originate from within the communities with outside assistance to implement.

In summary, the Commission's suggestions are that QOGR:

- develop links with the Indigenous Government Coordinators Office and the Negotiation Tables with a view to exploring local strategies to address gambling in the communities
- explore ways of gaining a better understanding of the prevalence of illegal gambling and its consequences in relation to misuse of alcohol and other drugs, and child abuse and neglect in some remote communities, and
- liaise with other agencies and service providers to provide more extensive support services to the communities, particularly the Cape communities, to address problem gambling, including illegal gambling.

Currently, the only readily accessible service in the Cape communities is the telephone Helpline. The nearest centres are Cairns and Townsville. Counselling services need to be culturally relevant at the point of contact, and discretion and confidentiality are of primary importance. One practical way that may assist, although this would need to be developed in conjunction with the communities, is through local area road-shows that include other healthy lifestyle programs and provide training to identified community members to ensure sustainable implementation and awareness of responsible gambling.

Please do not hesitate to contact Richard Proctor, Senior Policy Officer, Strategic Policy and Research (ph: 3247 5520; e-mail: richard.proctor@ccypcg.qld.gov.au) should any aspects of this advice require clarification.