



**FINANCIAL COUNSELLORS' ASSOCIATION
OF WESTERN AUSTRALIA**

FCAWA SUBMISSION

Review and Reform of Western Australian Gambling Laws

December 2025

About FCAWA & Financial Counselling

FCAWA

The Financial Counsellors' Association of Western Australia (FCAWA) is the peak body and voice of financial counselling in WA. We advocate for financial wellbeing and promote excellence in the sector to achieve our goals of financially resilient communities and reduced hardship for all.

We provide Financial Counsellors with training, resources, events and professional support so they can deliver free, independent and confidential help to people facing financial hardship. We also advocate for systemic change, working with government, regulators, and agencies to make financial systems fairer and more compassionate.

As a not-for-profit organisation, FCAWA:

- Provides continuous professional development, resources, and support for Financial Counsellors.
- Advocates for a fair and equitable marketplace.
- Works to raise the profile of Financial Counsellors.
- Advocates to increase access to financial counselling.
- Works to improve hardship processes for people in financial difficulty.

Financial Counselling

Financial counselling is a free, independent and confidential service provided by qualified professionals to people experiencing financial hardship. Financial Counsellors support individuals, families and small businesses to stabilise their financial situation through budgeting and money planning, understanding rights and negotiating with creditors, exploring options such as bankruptcy, accessing grants or concessions, and connecting with other support services including mental health, AOD, legal and family violence supports.

Acknowledgement of Country

We acknowledge the Traditional Custodians of the land on which FCAWA's Head Office is located, the Whadjuk people of Noongar Boodjar.

We recognise their continued connection to the land and waters of this beautiful place, and acknowledge that they never ceded sovereignty. We respect all Whadjuk Elders and their Ancestors, and all First Nations peoples.

Executive Summary

The Financial Counsellors' Association of Western Australia welcomes the opportunity to contribute to the Review and Reform of Western Australian Gambling Laws. Despite a prevailing belief that gambling harm is less significant in Western Australia because electronic gaming machines have not proliferated in the State,¹ evidence shows that gambling-related harm is widespread and increasingly driven by digital wagering environments.

The most significant drivers of harm in WA today are online wagering, offshore gambling platforms, and aggressive digital advertising.²⁻³ These risks are particularly acute for vulnerable groups including young adults,⁴ Fly-in Fly-Out (FIFO) workers, Rural, Regional and Remote (RRR) communities,⁵ and people experiencing financial stress.

WA's current legislative and regulatory framework was not designed for contemporary digital gambling environments and does not reflect current public health evidence.¹ As gambling harm has grown in scale and complexity, specialist gambling therapeutic services and gambling financial counselling have remained under-resourced and insufficient to meet current and emerging community need.

This submission draws on WA-specific evidence, national research, and frontline insights from financial counsellors supporting individuals and families experiencing gambling harm. FCAWA strongly supports reforms that modernise WA's gambling legislation and place consumer safety at the centre of all regulatory decisions, including strengthened legislative objects, contemporary harm-minimisation requirements, a statutory duty of care, enhanced enforcement powers, and a coordinated whole-of-government approach.

Introduction

Financial counsellors support thousands of Western Australians each year who experience financial hardship, debt, financial abuse, and gambling-related harm. Presentations involving gambling are becoming increasingly complex and severe, driven by the rapid expansion of online gambling, sports wagering, and continuous forms of betting. *You win some, you lose more: The social and economic costs of gambling* identifies these products as higher risk due to their speed, accessibility, and behavioural design features.³

Financial counsellors observe gambling harm as it unfolds in real time. Clients commonly present with unmanageable financial losses, coercive debt, relationship breakdown, family and domestic violence, homelessness risk, and significant mental health deterioration. These patterns are consistent with national evidence linking gambling harm with financial distress, family stress, and broader social and health consequences.

Digital wagering environments, including sports betting, micro-betting, high-intensity products, and personalised inducements, are driving new patterns of harm. The Murphy Report identifies these features as major contributors to gambling risk because they enable continuous, high-intensity engagement in ways not contemplated when Western Australia's current gambling legislation was developed³ As a result, significant gaps in consumer protection now exist.

FCAWA welcomes the opportunity to contribute to a modernised legislative framework that strengthens consumer protection, aligns with public health principles, and embeds robust harm-minimisation measures to reduce gambling-related harm for all Western Australians.

¹ Western Australian Council of Social Service (2025). *A Path Forward for Reducing Gambling Harm in WA: A Scoping Study*. WACOSS, Perth.

² Financial Counselling Australia, FCACT, FCAN, FCAQ, SAFCA, FCAT, FCVic & FCAWA (2023). *Submission to the Standing Committee on Social Policy and Legal Affairs: Inquiry into Online Gambling and Its Impacts on Those Experiencing Gambling Harm*. Financial Counselling Australia.

³ Parliament of Australia, House of Representatives Standing Committee on Social Policy and Legal Affairs (2023). *You win some, you lose more: The social and economic costs of gambling*. Parliament of the Commonwealth of Australia, Canberra.

⁴ Mancini, V. O., Brett, J. D., Heirene, R. M., Fisher, K., Nevill, T. P., & Mitrou, F. (2025). *Predicting Problem Gambling in Young Men: The Impact of Sports Gambling Frequency and Internalizing Symptoms*. *Journal of Gambling Studies*.

⁵ Painted Dog Research & Marra Worra Worra Aboriginal Corporation (2024). *Gambling Harm Research in the Fitzroy Crossing*. Gaming Community Trust

Gambling Harm in Western Australia

Western Australia's gambling environment has historically been shaped by the absence of poker machines in pubs and clubs and the long-standing centralisation of gambling at Crown Perth. This has contributed to a persistent misconception that WA experiences lower levels of gambling harm compared with other jurisdictions.

However, gambling in WA has changed dramatically. Online gambling and sports wagering have expanded rapidly, reflecting national trends identified as the fastest-growing and highest-risk gambling categories. Financial counsellors are now seeing significant harm arising from early gaming exposure, wagering apps, offshore casino-style platforms, and sports betting. These products are fast, accessible, available 24/7, and influenced by design features such as inducements and personalization, factors the Murphy Report³ identifies as increasing gambling intensity and driving greater risk of harm.

Funding and policy settings have not kept pace with these changes, and WA's system remains oriented toward a legacy casino-based model that does not reflect the contemporary gambling environment. Specialist gambling therapeutic services and gambling financial counselling remain extremely limited and concentrated in Perth, leaving many consumers without timely or appropriate support and increasing the risk that gambling harms will escalate or go undetected.

Evidence of Gambling Harm in WA

Financial counsellors consistently report that clients presenting with gambling harm also experience financial stress, relationship breakdown, family and domestic violence, mental health concerns, and crisis-level debt. These patterns are consistent with national evidence showing that gambling harm frequently co-occurs with financial distress, mental health deterioration, and relationship breakdown, and that harm levels increase with the intensity of gambling products such as online wagering and sports betting.³

There is also strong evidence that more effective harm-minimisation measures can reduce the incidence and severity of these associated social harms, including suicidal ideation, by reducing exposure to high-risk gambling environments and products.³

Suicide Risk

Suicide and suicidal ideation represent a significant but often hidden component of gambling harm. National inquiries highlight elevated suicide risk among people experiencing severe gambling harm, particularly where financial crisis, shame, indebtedness, and relationship breakdown intersect.³ Financial counsellors regularly observe clients presenting in acute distress, often at crisis point, after prolonged or escalating gambling losses.⁶

FIFO Workers

FIFO workers face heightened risk due to isolation, boredom during downtime, long shifts, financial pressure, and relatively high disposable income. These factors create conditions in which gambling can rapidly escalate, with many FIFO workers reporting regular engagement with online wagering while on-site. Financial counsellors note that these patterns can progress quickly to harmful or addictive behaviour.

Young Adults

Young men represent a rapidly escalating risk group. Some transition from early gaming behaviours into sports betting, and sports betting frequency has been identified as one of the strongest predictors of future gambling harm.⁴ National evidence also notes that young men are disproportionately targeted through digital advertising, personalised inducements, and sports-integrated wagering.³

⁶ Financial Counsellors' Association of Western Australia (2025). *Submission to the Western Australian Suicide Prevention Framework*. Submission to the WA Government. FCAWA.

Regional, Rural, and Remote (RRR) Communities

Financial counsellors in northern WA also report widespread unregulated card gambling in some communities, often involving Centrelink or other household income. These losses can have severe consequences, including increased family and domestic violence, anti-social behaviours related to financial desperation, and an inability to meet basic needs for children and families.

Emerging forms of harm, including “scambling”, present additional risks in RRR communities. Barriers such as reduced access to reliable information, lower digital literacy, and limited availability of specialist supports can increase vulnerability to fake betting platforms, impersonation of licensed operators, and online gambling-related scams, compounding financial loss and delaying detection and support.

These harms are significant, multi-layered, and often intensified by limited access to specialist services. Financial counsellors working with clients in northern WA report that they frequently lack the training, tools, and referral pathways needed to identify and manage gambling harm effectively, resulting in many cases going undetected or unaddressed.

Systemic Gaps in WA

The WACOSS Report, A Path Forward for Reducing Gambling Harm in WA: A Scoping Study,¹ identifies several major system gaps in Western Australia’s approach to gambling harm, including:

- the absence of a statewide gambling harm strategy,
- no dedicated government unit with responsibility for gambling harm,
- a lack of coordinated cross-agency oversight, and
- legislation that does not reflect the risks associated with modern digital gambling environments.¹

Specialist gambling therapeutic services and gambling financial counselling in WA are grossly underfunded and insufficient to meet community need. As gambling harm has grown in complexity and prevalence, this constrained service capacity has resulted in significant unmet demand for support across the State.

Over recent years, FCAWA has sought government support to deliver statewide gambling harm training for financial counsellors. Such training would build the skills, knowledge and confidence needed to identify gambling harm early, respond appropriately, and reduce risks for clients. These requests have not yet been funded, leaving a critical gap in frontline capacity across metropolitan, regional, and remote areas.

Meanwhile, online gambling, offshore casinos and social-media-based gambling operations continue to expand with minimal State oversight or consumer protection, exposing Western Australians to products and environments associated with high levels of harm.²

In addition, funding arrangements for gambling financial counselling have not kept pace with the growth and changing nature of gambling harm. There is limited dedicated Commonwealth funding for gambling-specific financial counselling through the Department of Social Services, constraining service capacity, workforce development, and statewide coverage. This funding gap places pressure on generalist services to respond to increasingly complex gambling-related presentations without adequate resourcing or specialist support.



Response to Consultation Questions

This section outlines FCAWA's responses to selected questions most relevant to consumer protection, harm minimisation, and financial counselling practice.

Question 1. Objects of Legislation

- A. Do you agree with the objects for the new legislation proposed above?
- B. Are there other overarching principles that the new legislation should capture that are not represented? If so, what are they and why are they necessary/important?
- C. Should any of the proposed objects be altered or removed? If so, which ones and why?

FCAWA broadly supports the proposed objects and does not recommend the removal of any existing objects. Our key priority is to strengthen the legislative objects, so they reflect modern gambling environments and clearly centre harm minimisation and consumer protection.

Modern gambling environments, particularly online wagering and digitally targeted betting, require legislative objectives that recognise gambling harm as a public health issue and embed clear responsibilities on providers to reduce risk.

Recommendations (linked to Q1)

1. Introduce a statutory duty of care for all gambling providers, requiring them to identify and respond to indicators of harm, consistent with national reform recommendations.³
2. Mandate proactive harm detection obligations, including the use of real-time risk monitoring and behavioural flags to identify escalating harm.
3. Embed a public health framing in the legislation, ensuring that reducing gambling-related harm is prioritised in all regulatory and licensing decisions.²
4. Require transparency and data reporting, including standardised harm metrics, intervention actions, exclusion data, and compliance information, to strengthen oversight and inform evidence-based policymaking.

Question 3. Enforcement Framework

- A. Do you agree with the diverse and flexible compliance and enforcement options for the new legislation proposed above?
- B. Are there other compliance or enforcement options that the new legislation should capture that are not represented? If so, what are they and why are they necessary/important?
- C. Should any of the proposed enforcement options be altered or removed? If so, which ones and why?

FCAWA supports a diverse and flexible enforcement toolkit and does not oppose any of the proposed enforcement options. Our focus is on strengthening industry compliance, protecting consumers, and addressing harms associated with online and offshore gambling operators.

Recommendations (linked to Q3)

1. Introduce mandatory refunds for gambling activity that occurs in breach of legislation, licence conditions, or responsible conduct obligations, ensuring consumers are not financially penalised for illegal or irresponsible provider behaviour.²
2. Empower the regulator to initiate compensation actions on behalf of affected persons, enabling redress where individuals may be unable or unwilling to pursue complex claims themselves. This ensures equitable access to justice and strengthens accountability.

3. Enable licence suspension or cancellation for systemic or egregious breaches, including repeated failures to detect or respond to indicators of harm, non-compliance with duty-of-care obligations, or breaches involving vulnerable consumers.

A modern enforcement framework of this kind is essential for addressing the risks posed by online operators, offshore entities, and emerging gambling technologies, where traditional compliance tools may be insufficient.

Question 5. Negative Licensing

- A. Do you have any concerns about, or objections to, the gambling products, services or activities listed above becoming negatively licensed? If so, what are your particular concerns/objections?
- B. Are there any other gambling products, services or activities that you think should be negatively licensed? If so, which ones and why?
- C. Are there any gambling products, services or activities that you think should be exempt from the new gambling legislation? If so, which ones and why?

FCAWA supports the products proposed for negative licensing and does not support exemptions for high-risk digital products, given their demonstrated harm potential.

Recommendations (linked to Q5)

The following product types should be captured within negative licensing due to their high-risk features and demonstrated associations with gambling harm:²

1. Online casino-style games, including digital roulette, blackjack, slots, and other continuous-play products.
2. Free-to-play apps with gambling-like mechanics, which normalise wagering behaviours and can serve as a pathway to later gambling.
3. Social casino platforms, where users engage with simulated gambling environments that mimic real-money play and are often heavily marketed.
4. Simulated gambling products marketed to young people, including games that use loot boxes, skins, or chance-based rewards that mirror gambling structures.

These product types combine accessibility, behavioural conditioning, and rapid play cycles, placing consumers, especially young people, at elevated risk of harm.

Question 7. Third Party & Intermediary Providers (TPSPs)

- A. Do you think TPSPs such as junket providers, professional fundraisers, gambling equipment suppliers should be required to be authorised under the new legislation?
- B. Which TPSPs (whether listed above or otherwise) should/should not have to be licensed? Why?
- C. Are there any TPSPs (whether listed above or otherwise) that should be set out in the regulations in the first instance? If so, which one(s) and why?
- D. Should there be other Prescribed requirements for all, or for particular, TPSPs?
- E. Should the legislation provide for the regulator to exempt certain categories/classes from the mandatory trust accounting Prescribed requirement? If so, what kinds of services/providers might this be applied to and why?

FCAWA's view is that all TPSPs handling gambling-related funds or consumer monies should be subject to licensing and trust accounting requirements, and that exemptions should be rare and clearly justified in legislation.

FCAWA supports the regulation of TPSPs involved in gambling-related activities. TPSPs can play a significant role in facilitating gambling products, fundraising lotteries, and ancillary services. Without appropriate oversight, these entities may create risks related to consumer protection, financial integrity, and the fair distribution of community funds.

A clear licensing and accountability framework is necessary to ensure that TPSPs operate transparently, ethically, and in line with public expectations.

Recommendations (linked to Q7)

1. Require full TPSP licensing and regular compliance audits, ensuring that all intermediaries meet appropriate standards of integrity, financial management, and harm minimisation.¹
2. Mandate clear fee transparency for fundraising lotteries, including public disclosure of the proportion of proceeds retained by TPSPs versus funds passed through to charitable or community organisations.
3. Prevent excessive TPSP fee retention that diverts significant portions of fundraising revenue away from intended community beneficiaries. Regulators should set expectations or thresholds to ensure fairness and maintain public confidence in charitable fundraising involving gambling components.

Question 8. Statutory Duty of Care

A. Should the WA government prescribe a statutory duty for all gambling service providers to take proactive steps to minimise the risk of harm to their consumers?

FCAWA strongly supports the introduction of a statutory duty of care requiring gambling providers to identify, respond to, and minimise gambling-related harm. A duty of care must extend beyond passive warnings and reactive measures and require providers to take proactive steps to prevent foreseeable harm.

Modern gambling environments, particularly online and app-based wagering, allow providers to continuously monitor consumer behaviour and identify patterns associated with escalating harm. These same environments should therefore impose clear obligations on providers to intervene early, provide meaningful safeguards, and ensure that consumers are actively connected to appropriate support services when risk indicators arise.

A statutory duty of care should also recognise that effective harm prevention requires clear, visible and practical pathways to assistance, including access to financial counselling. Financial counsellors regularly support people experiencing gambling-related debt, financial crisis, family stress and housing risk, yet referrals to financial counselling are often absent from gambling harm messaging, including in casino environments. Embedding referral obligations within a duty of care would strengthen early intervention and ensure that consumers receive support before harm becomes entrenched.

A statutory duty of care would align Western Australia with best-practice public health approaches and reinforce that gambling providers share responsibility for preventing foreseeable harm, rather than relying on individual self-control alone.³

Recommendations (linked to Q8)

1. Introduce a statutory duty of care requiring gambling providers to proactively identify, respond to, and mitigate gambling-related harm.
2. Require real-time risk monitoring using behavioural indicators such as rapid deposit patterns, chasing losses, night-time gambling, and frequent failed deposits.
3. Mandate graduated intervention responses, including welfare checks, play pauses, cooling-off periods, and account restrictions when harm thresholds are reached.

4. Require standardised, prominent referral to financial counselling services, including the National Debt Helpline (1800 007 007), alongside existing gambling help messaging, across physical venues and digital platforms.
5. Introduce a lifetime self-exclusion option, alongside shorter exclusion periods, allowing individuals experiencing severe or recurrent gambling harm to permanently exclude themselves from gambling products and venues, with appropriate safeguards and review mechanisms.
6. Standardise harm-reduction tools across all providers, including deposit limits, wagering caps, self-exclusion systems, and time-use notifications, to ensure consistency and consumer clarity.³

Question 9. Compensation Mechanism

- A. Do you agree with the proposal to introduce a statutory mechanism to enable consumers and affected persons to obtain compensation for loss or damage caused by gambling provider misconduct?
- B. Alternatively, do you prefer one of the other Options above, or an alternative model of compensation in gambling regulation? If so, which one and why?
- C. What measures would help ensure the mechanism is accessible for people experiencing financial stress or personal disadvantage?
- D. What kind of misconduct or legislative breaches should trigger a compensation order?
- E. Should applications for compensation be able to be made by affected persons as well as by the regulator (on behalf of affected persons)?
- F. How might a statutory compensation mechanism be implemented in a manner responsive to the needs of individuals with a gambling disorder?

FCAWA supports the introduction of a statutory compensation mechanism enabling consumers to seek redress where gambling providers have engaged in misconduct, breached regulatory obligations, or failed to prevent foreseeable harm. Many individuals experiencing gambling harm face barriers to pursuing complaints or compensation through traditional legal channels, including financial stress, shame, trauma, and limited understanding of their rights.

A well-designed compensation mechanism would enhance accountability, deter non-compliance, and provide meaningful pathways to remedy harm. It would also support affected family members, who often bear the financial and emotional consequences of gambling-related misconduct.

Recommendations (linked to Q9)

1. Make the mechanism free, simple, accessible, and trauma-informed, ensuring that consumers are not further burdened by complex processes or financial costs.
2. Empower the regulator to act on behalf of individuals, enabling action where consumers are unable or unwilling to pursue claims themselves and ensuring consistent enforcement.²
3. Allow compensation for harm suffered by affected others, including partners, family members, and caregivers who may experience financial loss, relationship breakdown, or family stress as a result of gambling harm.⁵

Question 10. Young Adults

- A. Should the minimum age for all gambling activities be increased?
- B. Do you agree with the proposal to introduce additional protections for young adults aged 18 to 24 engaged in gambling? If so, what kind of additional protections should be introduced?

FCAWA supports increasing the minimum age for gambling activities and recommends that the WA Government consider options such as raising the minimum age to at least 21, informed by consultation with experts and affected communities. FCAWA also strongly supports additional protections for young adults.

Young adults, particularly young men, represent a high-risk group for gambling harm. Research indicates that early gaming exposure, frequent sports betting, online wagering, and targeted digital advertising significantly increase vulnerability to harmful gambling behaviours.⁴

This age group is also disproportionately exposed to gambling promotions integrated into sporting culture, social media platforms, and online influencers. These marketing environments normalise gambling as a routine social activity and reduce perceptions of risk, creating pathways to harm at a formative life stage.

Recommendations (linked to Q10)

1. Strengthen age-specific protections, including restrictions on inducements, bonus bets, and personalised promotions directed at young adults.
2. Implement tailored harm-reduction interventions that reflect the behavioural and developmental characteristics of this cohort, such as targeted education campaigns, early-intervention tools, and digital harm-prevention features designed for mobile environments.
3. Prohibit advertising targeted at or disproportionately consumed by young adults, including digital marketing, influencer promotions, sports-embedded advertising, and high-reach social media content that appeals to this demographic.

Question 11. Gambling Advertising

A. Which option do you prefer and why?

B. Scope of advertising restrictions:

- i. Do you support the introduction of additional gambling advertising restrictions in WA?
- ii. Should advertising restrictions be different for online gambling service providers compared with land-based gambling service providers? If so, how should they differ, or what kind of restrictions would be appropriate for each?
- iii. Are there specific advertising formats that should be explicitly regulated or unregulated?

C. Implementation and enforcement: What challenges do you foresee in enforcing new advertising restrictions?

FCAWA supports the most restrictive option presented in the Consultation Regulatory Impact Statement (CRIS), and notes that enforcement will require strong monitoring of digital platforms and cooperation with national regulators.

National inquiries have shown that the pervasive and highly targeted nature of gambling advertising, particularly through digital platforms, sporting broadcasts, and influencer channels, normalises gambling, encourages risk-taking, and undermines harm-reduction efforts.³

Advertising saturation is especially harmful for young people and for individuals attempting to reduce or stop gambling. Continuous exposure to inducements, bonus offers, and personalised marketing significantly increases the likelihood of relapse and contributes to the escalation of harm.

Recommendations (linked to Q11)

1. Restrict gambling advertising across all platforms, including digital media, social media, influencer content, streaming services, and sports broadcasts, consistent with national reform recommendations.³
2. Ban inducements from betting agencies, such as bonus bets, cashbacks, odds boosts, and loyalty promotions, including where delivered via mobile phones or targeted notifications, as these tools encourage repetitive betting and reduce consumer control.
3. Require strict separation between gambling advertising and children's content or sporting events, including a ban on gambling advertising during children's programming, family viewing times, or any content likely to be accessed by minors on any device.

4. Prohibit advertising and messaging that normalises high-risk gambling behaviours among young men, including sports-linked promotions and marketing that frames gambling as a routine or expected part of male social identity.

Question 12. Anti-Money Laundering (AM) and Counter-Terrorism Financing (CTF)

- A. What mechanisms could be introduced by legislation to monitor and enforce AML/CTF obligations at the State level?
- B. What impact would expanded AML/CTF obligations have on gambling operators in WA, particularly smaller operators already captured by the AML/CTF Act?

FCAWA supports stronger AML/CTF oversight within Western Australia's gambling framework. Gambling venues and digital wagering platforms can be vulnerable to money laundering, fraud, and illegal financial activity, particularly where large transactions, online payment systems, or offshore operators are involved. Enhanced oversight is essential to maintaining system integrity and protecting consumers.

Recommendations (linked to Q12)

1. Establish improved data-sharing arrangements between State gambling regulators, AUSTRAC, and law enforcement agencies to strengthen monitoring, enable timely detection of suspicious activity, and support coordinated enforcement.
2. Support smaller gambling operators through a risk-based compliance framework, ensuring obligations are proportionate to risk exposure while maintaining robust safeguarding standards.²
3. Require mandatory reporting of high-value gambling transactions, including digital transfers, cash equivalents, and transactions involving offshore platforms, to reduce vulnerabilities and strengthen transparency.

Question 14. Regulation of interstate gambling service providers

Which of the above options do you prefer and why?

FCAWA supports the strictest regulatory option for interstate online gambling providers. Online wagering services licensed in other jurisdictions should not be permitted to operate in Western Australia unless they meet the State's consumer protection, harm minimisation, and enforcement standards. Without consistent regulation, consumers may face heightened risk from providers operating under weaker or inconsistent compliance regimes.

A WA-specific authorisation framework would help ensure that all gambling products accessible to Western Australians, regardless of where the provider is based, are subject to equivalent obligations and oversight.

Recommendations (linked to Q14)

1. Introduce a WA authorisation requirement for interstate providers, mandating that any operator seeking access to WA consumers meets the State's regulatory standards, including duty of care, advertising restrictions, and harm mitigation obligations.
2. Require full adherence to WA's consumer protection and harm minimisation settings, ensuring that interstate providers cannot rely on weaker regulatory environments or exploit legislative inconsistencies across jurisdictions.

Question 24. Emerging Technologies

- A. Are you aware of any new or emerging technologies that the reforms should consider for the new legislation?
B. If so, what are they?

Emerging technologies are reshaping gambling environments and creating new risk pathways, particularly for young people and digitally engaged consumers. These include cryptocurrency-based gambling, AI-driven advertising, esports betting, skin-gambling markets, and unregulated social casino apps, all of which present challenges for traditional regulatory frameworks.²

These technologies often operate across jurisdictions, use opaque algorithms, and leverage digital platforms that facilitate rapid play, anonymity, and monetisation of gaming behaviours. Without proactive regulation, consumers may be exposed to significant harm before regulatory systems have the opportunity to respond.

Recommendations (linked to Q24)

1. Draft legislation to be technology-neutral and adaptable, ensuring that regulatory settings remain effective as new forms of digital gambling emerge and evolve.
2. Create proactive monitoring mechanisms for emerging digital products, including early-warning systems, research partnerships, and regulatory capacity to respond quickly to new trends.
3. Require disclosure of algorithmic targeting practices, including the use of personalised promotions, behavioural tracking, and AI-driven marketing tools that may intensify gambling behaviours or disproportionately target vulnerable groups.

Question 25. Emerging Risks

- A. Are you aware of any emerging risks that the reforms should consider for the new legislation?
B. If so, what are they?

Yes. Several emerging risks are reshaping gambling harm in Western Australia. These risks reflect shifts in consumer behaviour, digital technology, and broader economic pressures. If unaddressed, they are likely to increase the prevalence and severity of gambling harm across the State.

Key emerging risks include:

- The emergence of “scambling”, where scam activity is disguised as or integrated with gambling products. This includes fake betting platforms, rigged online casinos, impersonation of licensed operators, and AI-driven inducements that closely mimic legitimate wagering environments. These schemes exploit gambling familiarity and financial distress, increasing the risk of rapid financial loss and delayed detection. These risks are amplified by increasing use of digital payment systems and offshore hosting, which can obscure accountability and complicate consumer redress.
- A rapid rise in young male sports bettors, with sports betting frequency shown to predict future gambling problems.⁴
- Gaming-to-gambling pathways, where ongoing engagement with gaming features (loot boxes, skins, microtransactions) normalises wagering behaviours and creates vulnerability to gambling inducements later in life.
- Social-media-based gambling operations, which can expose consumers, particularly young people, to unregulated gambling environments and peer-driven pressure.⁵
- The expanding use of AI-driven targeting, which may be used to personalise inducements, identify behavioural vulnerabilities, and encourage continuous play.

- Offshore casinos targeting WA consumers, operating outside Australian regulatory frameworks and offering high-risk gambling environments.²
- Cost-of-living pressures driving “desperation gambling”, where individuals gamble in attempts to address financial stress, something increasingly reported by financial counsellors.

These emerging risks highlight the need for anticipatory, rather than reactive, regulatory and policy responses.

Recommendations (linked to Q25)

1. Develop a State-level gambling harm monitoring system, supported by cross-agency data sharing, to identify emerging risks, including gambling-related scams and hybrid gambling–fraud products, at an early stage.
2. Require regular reporting of harm indicators, intervention actions, and emerging risk data, enabling the regulator to monitor consumer vulnerability, industry behaviour, and harm trajectories over time.
3. Establish a statewide early-warning framework for new gambling technologies, products, and practices, allowing government to respond quickly as risks emerge and before harm becomes widespread.

Conclusion

FCAWA welcomes the reform process and urges the WA Government to modernise gambling legislation to reflect the significant changes in gambling behaviour and risk profiles across the State. The rapid expansion of online wagering, offshore casino-style platforms, and aggressive digital advertising has intensified gambling harm in Western Australia.^{2 3} These impacts are particularly pronounced in vulnerable groups, including young adults,⁴ people experiencing financial stress, and Aboriginal communities in regional and remote areas, where gambling contributes to financial insecurity, humbugging, relationship strain, and broader community tension.⁵

WA’s current service system is not equipped to meet these contemporary challenges. Specialist gambling therapeutic services and gambling financial counselling are severely under-resourced and cannot keep pace with the scale and complexity of harm experienced across metropolitan, regional, and remote communities. Financial counsellors in northern WA report that unregulated gambling practices, including informal card gambling, are contributing to escalating financial distress, family pressure, and unmet support needs, underscoring the urgent need for expanded workforce capability and targeted interventions.

Comprehensive reform is needed to ensure that Western Australians are protected from harm in an increasingly high-risk, technology-driven gambling environment. FCAWA supports legislative amendments that strengthen harm minimisation and consumer protection, including clearer legislative objects, a statutory duty of care for providers,³ stronger enforcement powers², mandatory data reporting, and robust advertising restrictions.³ These reforms should be supported by coordinated whole-of-government action and a statewide strategy to prevent and reduce gambling harm.¹

With strengthened legislation, expanded specialist services, and enhanced workforce training across WA, the State has a clear opportunity to move from a reactive to a proactive model of gambling harm prevention. FCAWA encourages the Government to adopt a modern, evidence-informed regulatory framework that reflects emerging risks, supports early intervention, and ensures safer gambling environments for all Western Australians.

Annexures

Annexure A

WACOSS (2025). A Path Forward for Reducing Gambling Harm in Western Australia.

(Attached with permission. Not yet publicly released.)

*A Path Forward for Reducing Gambling Harm in WA –
A Scoping Study, supported by Healthway*

September 2025

Acknowledgement of Country

WACOSS respectfully acknowledges the Traditional Owners of Country throughout Western Australia and recognises their continuing connection to land, waters and community. We pay our respects to them, their cultures, and to elders both past and present. We acknowledge the land on which we live and work was, and always will be, Aboriginal land. Sovereignty was never ceded.

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About WACOSS

WACOSS is the peak body for the community services sector in Western Australia and works to create an inclusive, just and equitable society. We advocate for social and economic change to improve the wellbeing of Western Australians, and to strengthen the community services sector that supports them. WACOSS is part of a network consisting of National, State and Territory Councils of Social Service, who advance the interests of people on low incomes and those made vulnerable by the systems that have been put in place.

Contact Details

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Introduction and Overview

The main goal of *A Path forward for reducing gambling harm in Western Australia* project was to explore strategic approaches for reducing gambling harm advocacy in WA. Central to this work was identifying key leverage points for reform across policy, practice, and legislation. Rather than prescribing a fixed strategy, the project sought to outline potential approaches and priorities for more effective coordination among stakeholders, and to map out priority areas for advocacy and action that could drive meaningful change across the state.

This project sought to understand:

1. What is the current state of harm reduction and prevention policy in WA?
2. Who is involved in gambling harm reduction and prevention in WA?
3. What are the opportunities for change to reduce gambling harm in WA?
4. What is an appropriate Advocacy Strategy to support implementation of change and ensure a coordinated approach to gambling advocacy in WA?

The project had five objectives:

1. Use currently available literature (including policy documents) to capture current policy understandings of the current state of gambling harm in WA, including the scope of gambling harm, impacts on specific demographics, and key challenges specific to the WA context.
2. Understand the current policy and regulatory approach to gambling harm reduction and prevention in WA, including current advocacy efforts.
3. Understand which stakeholders are actively involved in gambling harm reduction and prevention in WA, including stakeholders involved in current advocacy efforts.
4. Identify opportunities for improving gambling harm reduction and prevention in WA, including priority areas for action and reform. Priority areas should balance what is achievable in the WA context with the need for change.
5. Develop an Advocacy Strategy that facilitates a coordinated and collaborative approach to gambling advocacy in WA, including improvements against the priority areas.

The project was funded under a Heathway grant.

Executive Summary

Gambling represents a growing public health concern in Western Australia, with millions of dollars lost each year and profound impacts on individuals, families, and communities. Despite mounting evidence of financial hardship, mental health challenges, and social dislocation linked to gambling, government responses have largely been limited to addressing issues in the Perth Casino, leaving other areas of gambling in WA unaddressed.

There is a prevailing belief that gambling harm isn't an issue in Western Australia because, unlike other states Western Australia has not allowed electronic gaming machines to proliferate. The community service sector that provides services for those affected by gambling harm are seeing a different picture, one where financial hardship, mental health and domestic violence are all being exacerbated by the forms of gambling allowed in WA. The figures that are available point to gambling costing the Western Australian community as much as it does in other states, albeit not through the same gambling opportunities.

These harms are imposing costs on the Western Australian community that need more examination and currently there is no coordinated community effort directed at having the issues related to gambling harm addressed. This gap in coordinated action has left many Western Australians exposed to harm without adequate prevention or support services.

The State Government's focus is currently on implementing the reforms recommended by the Perth Casino Royal Commission, this ignores the risk of gambling and its related harms that are occurring in the broader community. Without adequate resources the community and health sectors are limited in the action they can take to either bring the issues to the attention of government or develop the solutions and advocate for their implementation. A stronger public health approach is needed—one that moves beyond incremental reforms to comprehensive, evidence-based strategies. Much remains to be done to ensure that the voices of those most affected by gambling harm are heard and the difficulties in which they find themselves are adequately addressed.

This report provides an overview of the current gambling landscape in Western Australia, highlighting both the initiatives underway to address gambling-related harms and the existing gaps where further action is needed. A summary of key findings and recommendations is presented below.

Project Findings

Gambling Harm in WA: What's Happening and Who's at Risk

- Gambling harm includes:
 - Financial harm
 - Relationship harm
 - Health harm
 - Emotional/psychological harm
 - Cultural harm
 - Work/study harm
 - Criminal activity
- Per capita gambling losses in Western Australia are on par with those in other Australian states

- Gambling-related harm is arising from activities at casinos, racecourses, TAB outlets, lottery participation, and via online platforms
- Key at-risk groups for gambling harm include FIFO workers, who may experience isolation and irregular routines; Aboriginal and Torres Strait Islander peoples, who face complex social and cultural factors; and young people, who are increasingly exposed to gambling through digital platforms and social environments.

Federal Reform Opportunities: Implementing the Murphy Report

- The federal government has received a report on online gambling, the House of Representatives Standing Committee on Social Policy and Legal Affairs “You win some, you lose more” colloquially known as the Murphy Report, with a comprehensive set of recommendations that have yet to be adopted.
- Implementing the recommendations of the Murphy Report remains key in addressing gambling harm.

Gambling Harm Regulation in WA: What’s Being Done and What’s Missing

- The regulation of online gambling falls under federal jurisdiction, while all other forms are overseen by the State Government
- The community sector plays a key role in mitigating the effects of gambling-related harm through its services
- The State Government's present approach centres on carrying out the Perth Casino Royal Commission's (PCRC) recommendations
- Online gambling is emerging as a major concern, driven by its increasing popularity and widespread availability
- The PCRC report addresses gambling harm in the casino (Chapter 12) – there has been no similar examination of gambling harm associated with lotteries, sports betting or racing.
- Under its legislation the Gaming and Wagering Commission (GWC) has the responsibility for addressing gambling harm.
- The GWC is focused on reform to the casino and on prosecuting illegal gambling.
- The resources to address gambling harm lie within the Department of Local Government, Industry Regulation and Safety (DLGIRS) and it works through the Problem Gambling Support Services Committee (PGSSC) to consider issues relating to gambling harm.
- DLGIRS has commissioned research on gambling harm (the Behavioural Insights Team (BIT) report) this research has not been released publicly.
- DLGIRS provides support for some other initiatives such as the Gambling Harm Awareness Week, a 24-hour gambling telephone help service and gambling harm counselling service.
- The funding for these activities largely comes from the gambling industry itself.
- The PCRC recommended, and the Government supported the recommendation, that the PGSSC be replaced with an independent advisory body. This recommendation has yet to be implemented.
- The State Government is prioritising the implementation of the recommendations of the PCRC. The proposed changes will not be implemented before 2027 at the earliest.
- WA contributes to Gambling Research Australia and benefits from its national research outputs, there is no publicly available data detailing how much of GRA’s funding is specifically spent within WA or on WA-targeted projects. This lack of transparency represents an opportunity for advocacy.

Absence of Strategic Direction and Coordination in Gambling Harm Response in WA

- The Departments of Health and Communities, along with the Mental Health Commission, acknowledged the existence and impact of gambling harm. However, they reported that addressing gambling harm does not currently fall within their formal responsibilities, as no specific directive or mandate has been issued by the government to guide their involvement in this area.
- There is currently no organisation within the community services or public health sectors that addresses gambling harm as a core service. This has led to a lack of coordination and collaboration across the system, resulting in fragmented responses and limited integration of gambling harm into broader health and social support frameworks.
- There aren't significant resources set aside to deal directly with gambling harm, making it difficult for services to respond effectively.
- Although many organisations encounter individuals affected by gambling harm, they typically do so in the context of other presenting issues, such as mental health, housing, or financial stress. As a result, gambling harm is not addressed through dedicated or coordinated strategies.

Identifying Opportunities for Change in Gambling Harm Prevention and Responses in WA

- There is an opportunity to strengthen gambling harm prevention and response in Western Australia through coordinated action between the State and Federal Governments, focusing on improved regulation, policy reform, and strategic investment in support services.
- Gambling activities beyond the casino—such as lotteries, sports betting, racing, and online platforms—need further analysis to ensure a comprehensive approach to understanding and addressing gambling-related harm across all forms of gambling
- Currently there is no coordinated approach to addressing gambling related harm by the community services sector
- Community services and public health sectors are central to addressing gambling-related harm through the delivery of prevention programs, early intervention, treatment services, and ongoing support for affected individuals and families.
- Despite the recommendation made by the Perth Casino Royal Commission, no independent advisory body to provide oversight of gambling regulation and harm minimisation has been established.
- There is an opportunity to strengthen gambling harm prevention and response efforts in Western Australia by ensuring that any advisory or decision-making bodies working to reduce gambling related harm include representation from the community services and health sectors and individuals with lived experience of gambling harm.
- Online gambling is the major area of concern and the Federal Government has yet to implement the recommendations of the Murphy Report.
- There is an opportunity for community services and public health sectors in Western Australia to strengthen their response to gambling-related harm by integrating it into organisational policies and strategies.
- Understanding the full extent of gambling-related harm in Western Australia could be improved with comprehensive research into the direct and indirect costs to individuals and society
- International experience points to potential areas that could be addressed to reduce gambling harm

- The absence of a gambling harm reduction policy in Western Australia contrasts with the more advanced measures implemented in other parts of the country.

Advancing Gambling Harm Prevention and Response in Western Australia: Building a More Coordinated, Inclusive, and Evidence-Informed Approach

Goals for addressing gambling related harm in Western Australia

- Support the introduction of the Murphy Report recommendations particularly phasing out advertising, a comprehensive national strategy, establishing a national regulator and delivering research based public education.
- Increasing the awareness of the public and the government of gambling related harm issues.
- Support legislative options to regulate advertising and promotion.
- Cross sector commitment to address gambling related harm to be encapsulated in an organisational structure.
- Three broad mechanisms for organisational structure – an existing organisation in the State takes on the role, an organisation that has achieving gambling harm reduction and prevention as its core business takes on the role or a state based organisation is created to take on the role.
- Community service and health organisations should be encouraged to include policy and strategy on gambling harm reduction in their areas of operation and to collect anecdotal evidence.
- Funding for service coordination and targeted workforce training to address gambling related harm.
- Independent decision-making and inclusive representation in gambling harm policy and governance requires the participation of the not-for-profit sector.
- Community service and public health sectors organisations should be represented on decision-making bodies including the GWC and independent advisory body
- Support evidenced based warning messages.

Recommendations

1. **Fostering Sector Collaboration and Capacity to Support Engagement in Gambling Harm Reduction**

Building a coordinated approach within the community services sector is essential to developing a coordinated and sustained response to gambling-related harm in Western Australia. While many organisations encounter the impacts of gambling in their work, the issue often remains peripheral to their core mission, resulting in limited strategic focus and resource allocation. By fostering collaboration across the sector, organisations can begin to share knowledge, align priorities, and collectively advocate for stronger policy and service responses. This kind of sector-wide engagement is critical to elevating gambling harm as a public health and social issue deserving of dedicated attention.

Establishing formal networks or working groups can help facilitate this collaboration, enabling organisations to co-design approaches, pool resources, and amplify their collective voice. Such efforts can also support the development of shared tools, training, and evidence-gathering practices

that build sector-wide capacity. Importantly, this collaborative momentum can lay the groundwork for more effective engagement with government and other stakeholders.

2. Establish a coordinated advocacy mechanism in the Western Australian Not-for-Profit Sector

- An existing Western Australian organisation to be commissioned to take on the role as part of its existing portfolio of activities.
- An existing organisation established elsewhere that has as its focus on the reduction of gambling harm be asked to establish itself in Western Australia.
- The community services and public health sectors create a specialist organisation in Western Australia to take on the role.

3. Priority areas in addressing gambling related harm in WA

<p>Increasing Public and Government Awareness of Gambling-Related Harm in Western Australia.</p>	<p>Promote broader public understanding of the personal, social and community impacts of gambling harm in WA, while advocating for increased recognition and responsiveness from government stakeholders. This includes highlighting the systemic nature of gambling-related harm and encouraging policy and funding initiatives that reflect its significance as a public health and social issue.</p>
<p>Development and Public Release of Research on Gambling Harm in Western Australia</p>	<p>Encourage the commissioning and public sharing of evidence-based research that examines the impacts of gambling harm, industry tactics, prevention approaches, and the availability and effectiveness of support services.</p>
<p>Explore Legislative Options to Regulate Gambling Advertising and Promotion in Western Australia</p>	<p>Undertake a review of potential state-level legislative measures to address the regulation of gambling advertising and promotional activities. This should include consideration of jurisdictional challenges, and assess opportunities to strengthen consumer protections and reduce exposure to gambling-related harm.</p>
<p>Cross-Sector Commitment to Address Gambling-Related Harm</p>	<p>Encourage coordinated action across key social policy sectors, including Mental Health, Alcohol and Other Drugs (AOD), Housing and Homelessness, Financial Counselling, Aboriginal Health, and Family and Domestic Violence, to recognise and respond to gambling-related harm. This includes integrating gambling harm into relevant strategies, frameworks, and action plans to ensure a holistic and inclusive approach to prevention and support.</p>
<p>Funding for Service Coordination and Targeted Workforce Training to Address Gambling-Related Harm</p>	<p>Advocate for dedicated funding to support the coordination of community services and the delivery of targeted training across sectors. This will strengthen the capacity of frontline workers and organisations to identify, respond to, and prevent gambling-related harm through integrated and informed approaches.</p>

<p>Independent Decision-Making and Inclusive Representation in Gambling Harm Policy and Governance</p>	<p>Advocate for a clear commitment that the gambling industry should not be involved in any decision-making related to the prevention and reduction of gambling-related harm. Relevant governance and advisory bodies should include diverse community representation including public health experts, service providers, researchers, young people and individuals with lived experience to ensure policy and decisions are transparent, evidence-informed, and aligned with community needs.</p>
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National advocacy efforts and focus- support recommendations

<p>Advocate for the full implementation of the Murphy Committee’s recommendations</p>	<p>Advocate for the full implementation of the Murphy Committee’s recommendations by state, territory, and Commonwealth governments, with a particular focus on those measures that will have the greatest national impact on reducing gambling-related harm. These include especially phasing out advertising, comprehensive national strategy, establishing a national regulator, and delivering research-based public education.</p>
<p>Support the development and implementation of research-informed warning messages across all forms of gambling product promotion.</p>	<p>Support the development and implementation of research-informed warning messages across all forms of gambling product promotion. These messages should be grounded in behavioural science and public health evidence, designed to counteract the misleading nature of gambling advertising and raise awareness of the risks associated with gambling. Consistent, prominent, and well-tested warnings—similar to those used in tobacco and alcohol regulation—can play a critical role in shifting public perceptions, reducing stigma, and encouraging help-seeking behaviour.</p>
<p>Advocate for strengthened and more transparent regulation of online wagering services based in the Northern Territory</p>	<p>Advocate for strengthened and more transparent regulation of online wagering services based in the Northern Territory, given their national reach and impact on gambling harm in Western Australia. The NT’s relatively permissive regulatory environment and low taxation have attracted the majority of Australia’s online gambling operators, limiting the effectiveness of harm reduction efforts across jurisdictions. Western Australia should engage with national policy forums and regulatory bodies to support reforms that ensure consistent consumer protections and targeted harm minimisation strategies for online gambling, regardless of the operator’s licensing location.</p>

Gambling Harm Reduction and Prevention in WA

This section examines the current landscape of gambling harm prevention and reduction policy in Western Australia. Drawing on key documents and local insights, it outlines the extent and nature of gambling-related harm across the state, including its impact on specific population groups and the unique challenges faced within the WA context. It also reviews existing government policy and regulatory approaches

What is Gambling Harm?

Gambling harm refers to the negative consequences that can arise when people have trouble limiting the amount of time and money they spend on gambling¹. This harm can affect not only the individual gambling but also those around them who are not directly participating².

Gambling harm can be experienced on a spectrum, ranging from minor negative experiences to crises, and is not always proportionate to the amount of gambling participation.

The Australian Institute of Family Studies (AIFS) states “[g]ambling harm can include:

- **relationship harm** (e.g. conflict within relationships, neglect of responsibilities)
- **health harm** (e.g. stress, depression, reduced sleep)
- **emotional/psychological harm** (e.g. feelings of regret, worthlessness, failure)
- **financial harm** (e.g. credit card debt, reduced spending on essentials)
- **work/study harm** (e.g. reduced performance due to tiredness, absenteeism).³

Gambling harm extends to family members including partners, children and parents of gamblers and can also impact friends and associates.

Marionneau, Egerer and Raisamo put it this way:

“Gambling-related harms span health, psychological, relationship, financial, cultural, work, and crime-related issues. Harms accrue to individuals (heavy gamblers, non-problem gamblers and nongamblers), but also to families, communities, and societies. Harms form a spectrum in terms of severity and temporality. Risk factors or determinants of gambling are often similar to the harmful consequences of gambling.”⁴

Figure 1: A breakdown of the types of gambling harms and an estimate of their prevalence in Australia

¹ Queensland Government. Signs of Problem Gambling. Business Queensland. Accessed August, 2025.

<https://www.business.qld.gov.au/industries/hospitality-tourism-sport/liquor-gaming/liquor/training/gaming/rsg-refreshers/problem-gambling/signs>.

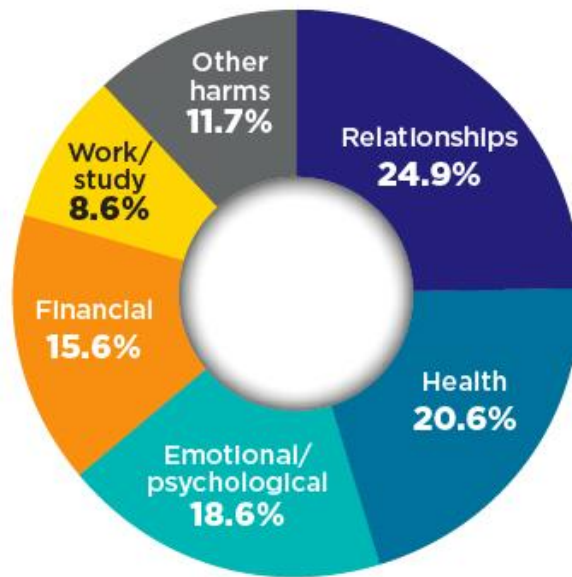
² Victorian Gambling and Casino Control Commission. Our Position on Gambling Harm. Accessed August, 2025.

<https://www.vgccc.vic.gov.au/about-vgccc/our-position-gambling-harm>.

³ Australian Institute of Family Studies. Understanding Gambling Harm and Ways to Identify Those at Risk. Accessed August, 2025.

<https://aifs.gov.au/resources/short-articles/understanding-gambling-harm-and-ways-identify-those-risk>.

⁴ Virve Marionneau, Michael Egerer & Susanna Raisamo: Frameworks of gambling harms: a comparative review and synthesis in *Addiction Research & Theory* Volume 31, 2023 - Issue 1 Pages 69-76 | Published online: 26 Aug 2022 accessed 5 June 2025



Source: Browne et al., 2016, p. 134, Figure 19 (Quoted in AIFS <https://aifs.gov.au/resources/short-articles/understanding-gambling-harm-and-ways-identify-those-risk>)

Gambling in WA

Australians' predilection to gambling has been highlighted in many studies and Western Australians are no exception (see figure 2), with gambling losses per head in Western Australia in line with the losses incurred by gamblers in other states (see figure 3).

This is despite the early decisions of authorities to ban pokies from the State and limit electronic gaming machines (EGMs) to the State's only casino, which has been credited with lessening the losses Western Australians incurred from gambling on gaming machines compared to other Australians.

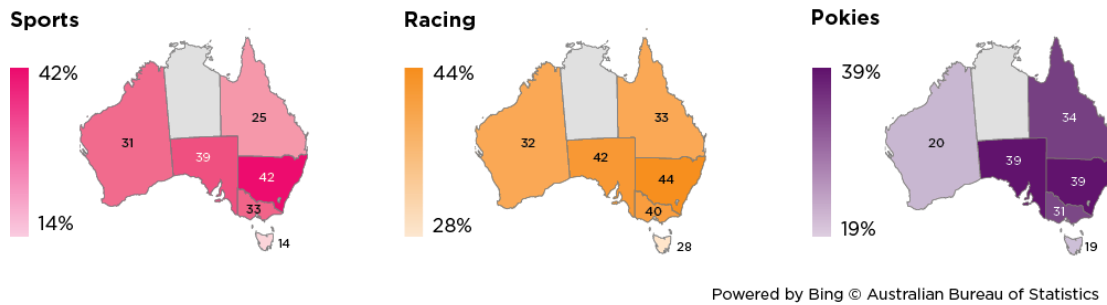
The Second Australian Gambling Study states that Western Australia has the highest estimated prevalence of gambling (62.9%) among the states and territories. Western Australians are significantly more likely than other Australians to take part in lotteries (52.8% versus 40.3%) and casino games (10.2% versus 5.6%) [12].

The effect of limiting the machines to one venue has created a false impression that gambling harm is not as significant in Western Australia as in other states where the machines have proliferated.

Figure 2 Percentage of population who gambled at least once in past 12 months on sports betting, race betting and pokies, by state⁵

5

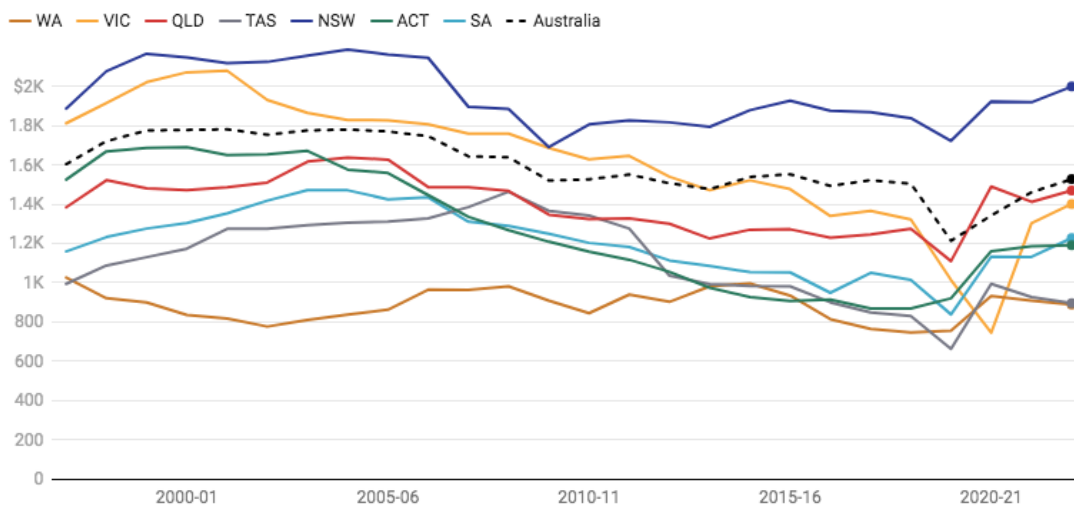
[Rebecca Jenkinson](#), Caillem Murray Boyle, [Kei Sakata](#), [Nancy Greer](#), Uma Jatkar, Brian Vandenberg: Gambling Participation and Experience Harm in Australia 2023. From <https://aifs.gov.au/research/research-snapshots/gambling-participation-and-experience-harm-australia>, Accessed 23 May 2025



Notes: Territories (the ACT and NT) were excluded due to low sample size ($n = 48$). State only sample included ($n = 1,717$). Australian Bureau of Statistics (ABS) weights (age/gender) used for estimation.

Figure 3: Average per capita losses on gambling of any Kind Across Australia⁶

Average per capita losses on gambling of any kind across Australia



Based on real per capita expenditure, which adjusts for inflation and population growth. Northern Territory is excluded from this chart as tax changes in 2019 made the data difficult to compare nationally

Chart: The Conversation • Source: Queensland Government Statistician's Office • Get the data • Embed • Download image • Created with Datawrapper

The reality is that even with the limited availability of EGMs, gambling is now creating significant levels of concern throughout the community services and public health sectors, as demand for sectors' services increases, potentially in part due to the impact of gambling on either the individuals seeking services, or the network of people around the gambler seeking support from the consequences of an individual's gambling.

Online Gambling

In June 2023 the House of Representatives Standing Committee on Social Policy and Legal Affairs published its report "You win some, you lose more",

⁶ Figures 3 From Russell Brown Rockloff: Gambling in Australia: how bad is the problem, who gets harmed most and where may we be heading? <https://theconversation.com/gambling-in-australia-how-bad-is-the-problem-who-gets-harmed-most-and-where-may-we-be-heading-252389> Accessed 21 May 2025

also known as the Murphy Report after Peta Murphy the Chair of the Committee. The report considered whether the current regulatory framework for online gambling and gambling advertising in Australia was fit for purpose and meeting community expectations.

The Committee found that the extent of gambling harm caused by online gambling was excessive and resulted from a weak and fragmented regulatory framework due to inconsistencies across the states and territories. The inconsistencies have resulted in the Northern Territory taking on the mantle of de facto online gambling regulator. The Committee “made 31 recommendations that apply a public health lens to online gambling to reduce harm across the whole Australian population.”⁷. The federal government has yet to respond to the recommendations.

Many issues confronted in the report apply to gambling in general and to Western Australia and represent a sound policy framework within which to tackle reducing and preventing gambling harm.

The State Government is a signatory to the National Consumer Protection Framework for Online Wagering in Australia⁸. The Statement states: “the National Consumer Protection Framework for online wagering (National Framework) aims to reduce the harm of online wagering to Australian consumers. To achieve this, the National Framework provides – ... – strong, nationally consistent minimum protections for consumers of interactive wagering services licensed in Australia, in line with international best-practice.”⁹ The most recent action in Western Australia undertaken under the Statement related to requirements to extend tag lines on online betting advertisements to advertising in Western Australia¹⁰.

There are a range of committees established by the public sector agencies responsible for gambling administration across the states that serve to coordinate action on gambling nationally. They are typically weak and rely on bureaucrats with state responsibilities to function. With few resources and confronted by a highly resourced industry lobby their impact on national policy is limited.

The WA state agencies participate in these committees but the prime driving forces for policy development in WA can be understood without detailed knowledge of the operation of these committees.

For the State Government focusing on putting pressure on the Commonwealth Government to implement the Murphy Report recommendations remains a vital mechanism to effectively address online gambling harm.

At risk Groups

Gambling Harm in Aboriginal and Diverse Cultural Communities in Western Australia

Gambling in Aboriginal and culturally and linguistically diverse (CALD) communities is raising particular concerns in Western Australia for several reasons:

⁷ House of Representatives Standing Committee on Social Policy and Legal Affairs “You win some, you lose more” (the Murphy Report) page iv:

https://www.aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlinegamblingimpacts/Report

⁸ A copy of the Statement can be found at <https://www.dss.gov.au/system/files/resources/national-policy-statement-updated-3-may-2022.pdf>

⁹ Department of Local Government, Sport and Cultural Industries. Consistent Gambling Messaging. Accessed August, 2025.

<https://www.cits.wa.gov.au/department/news/news-article/2025/03/24/consistent-gambling-messaging>

¹⁰ <https://www.cits.wa.gov.au/department/news/news-article/2025/03/24/consistent-gambling-messaging>

- Higher rates of problem gambling in Aboriginal communities has been raised as an area of concern
- Disproportionate Cultural impacts: Gambling can lead to the degradation of traditional values and customs, a harm that may be felt more keenly by indigenous and other minority communities
- Unique Community Challenges: Research in other states has revealed there may be specific gambling participation and related issues within various CALD communities
- Lack of Guided Interventions: the lack of research has resulted in there not being enough evidence to effectively guide interventions aimed at preventing and reducing gambling harm in these communities.

Gaming Impacts on Young People

Gambling among young people in Western Australia is a growing concern, with research indicating that gambling behaviours often begin well before the legal age of 18. National data shows that nearly one in three (30%) Australians aged 12–17 engage in gambling activities, increasing to almost half (46%) among 18–19-year-olds.¹¹ These early experiences with gambling can establish patterns that persist into adulthood, contributing to long-term financial and psychological harm.

In WA, the rise of online gambling platforms, coupled with the normalisation of betting in sports and popular culture, has made gambling more accessible and appealing to youth. This exposure is further amplified by targeted advertising and the integration of gambling-like features in video games, such as loot boxes and virtual currency purchases.

Fly in Fly Out (FIFO) Workers

Fly-in, fly-out (FIFO) workers in Western Australia may face a significantly higher risk of problem gambling compared to the general population. One study found that problem gambling among FIFO workers might be up to 15 times higher than in the general population¹². The FIFO lifestyle, which can lead to heightened stress, loneliness, and difficulty accessing support, may contribute to this trend¹³. A financial counselling service in Western Australia has also reported an increase in FIFO workers seeking help for gambling-related financial issues¹⁴. In addition to problem gambling, FIFO

¹¹ The Australia Institute. Teenage Gambling in Australia. April 2025. <https://australiainstitute.org.au/wp-content/uploads/2025/04/P1786-Teenage-gambling-in-Australia-Web.pdf>.

¹² ABC News. Problem Gambling up to 15 Times Higher among FIFO Workers: Research. August 9, 2015. <https://www.abc.net.au/news/2015-08-09/problem-gambling-15-times-higher-among-fifo-workers-research/6683762>.

¹³ Chelsea Psychology. The Ups and Downs of FIFO. Accessed August 9, 2025. <https://chelseapsychology.com.au/index.php/library/37-the-ups-and-downs-of-fifo>

¹⁴ Parliament of Australia. Inquiry into Online Gambling and Its Impacts on Those Experiencing Gambling Harm. Accessed August, 2025. <https://www.aph.gov.au/DocumentStore.ashx?id=22407d53-26d3-4a38-bbeb-b3ae219999fe&subId=725578>.

workers also experience higher levels of depression and anxiety, and engage in other risky behaviours such as smoking and risky drinking.^{15 16}

Current State of Gambling Harm Prevention Policy in Western Australia

In Western Australia gambling harm is occurring due to gambling:

- At the casino
- At horse and greyhound racing events
- In TABS
- Lottery participation; and
- Online, including on sporting events

Both the State and Federal Governments require policies that address the reduction and prevention of gambling harm. As well, ameliorating the effects of gambling harm requires the provision of services usually provided by the not-for-profit community services and public health sectors through services funded by the governments and the philanthropic sector. The state of policy development relating to gambling harm needs to be considered in all areas.

Online gambling regulation is the responsibility of the Federal Government. It is online gambling that is currently causing a major concern and requires urgent action.

The State Government has responsibility for regulating all other forms of gambling. At the state level, current gambling harm prevention and reduction policy appears to be limited to addressing the issues raised by the Perth Casino Royal Commission (PCRC) with the agencies responsible for providing advice to the government on gambling working on implementing the recommendations in its Report. Beyond the casino, there is little evidence of anything significant being considered at legislative or bureaucratic levels to address the impact of gambling harm.

During sector consultations and discussion, it was clear many community service and public health organisations in Western Australia are witnessing the significant impact of gambling-related harm on the communities they support. However, as gambling is not typically a core focus of their work, these organisations often lack the capacity and resources to actively address it. As a result, few have developed formal policies or strategic frameworks to respond to gambling harm, and the issue remains underrepresented in sector-wide planning and service delivery.

Current Oversight: Laws, Agencies, and Commissions Related to Gambling Harm in WA

The State Government is responsible for all forms of gambling regulation other than online. As mentioned the current policy focus of the Government and its agencies is on implementing the recommendations of the PCRC, so the recommendations made by the Commission are critical to understanding current government policy on the reduction of gambling harm in Western Australia.

¹⁵ Joyce, Simon, and Robert J. Tomlinson. Health Behaviours and Outcomes Associated with Fly-in Fly-out and Shift Workers in Western Australia. ResearchGate. Accessed September 12, 2025.
https://www.researchgate.net/publication/230564173_Health_behaviours_and_outcomes_associated_with_Fly-in_Fly-out_and_Shift_workers_in_Western_Australia.

¹⁶ The Skill Collective. Looking After Your Mental Health While FIFO: Tips to Help. Accessed September 12, 2025.
<https://theskillcollective.com/blog/fifo-mental-health-tips>.

The Gaming and Wagering Commission (GWC) and the Department of Local Government Industry Regulation and Safety (DLGIRS) (previously the Department of Local Government Sport and Cultural Industries) are the two overarching bodies responsible for providing advice to government on the implementation of the recommendations. They are also responsible for providing advice on addressing gambling harm in WA.

There are a number of other committees and bodies that are relevant and also included.

Legislation Governing Gambling in Western Australia

The legislation relating to gambling in WA includes:

- Betting Control Act 1954
- Bookmakers Betting Levy Act 1954
- Casino (Burswood Island) Agreement Act 1985
- Casino Control Act 1984
- Gaming and Wagering Commission Act 1987
- Racing and Wagering Western Australia Act 2003

Of these Acts only one, the GWC Act, specifically mentions gambling harm (see the subsection on the GWC).

There have been two amendment Acts amending gambling legislation resulting from recommendations of the PCRC.

The first, the Casino Legislation Amendment (Burswood Casino) Act 2022 made changes just to the casino legislation. The Gambling Legislation Amendment Act 2024 introduced a number of changes to broader legislation than just that relating to the casino but the bulk of the changes will be made in the third tranche of legislation that will likely not come before Parliament until at least 2027. Some of these changes may result in impacts on gambling harm prevention and reduction but detailed information on the proposals are not yet in the public domain.

The Minister for Racing and Gaming has responsibility for the legislation controlling gambling.

Department of Local Government, Industry Regulation and Safety (previously the Department of Local Government, Sport and Cultural Industries)

The Department is “...responsible for regulating and maintaining the integrity of lawful racing, gaming and liquor activities for Western Australians to participate in.”¹⁷

The Department has a service level agreement with the GWC whereby it provides staffing to enable the GWC to perform its functions.

The Department has around 120 staff engaged on racing and gaming issues in the Racing Gaming and Liquor section. The Department has negotiated significant levels of funding from the industry to cover the costs of its operations including that of the GWC, and it is unlikely that the costs of regulating the industry require any additional contribution from general government funding. The

¹⁷ Department of Local Government, Sport and Cultural Industries. Racing, Gaming and Liquor. Accessed August, 2025. <https://www.dlgsc.wa.gov.au/racing-gaming-and-liquor>.

yearly casino gaming licence fee for 2024 was \$12 million, a substantial increase from the \$5 million paid the previous year¹⁸.

The Department is currently separating racing and gaming from the liquor activities primarily to make it easier to satisfy the GWC and the industry that the funding the industry is contributing is being used predominately to fund the racing and gaming regulatory activities of the Government.

The publicly available information (the Annual Report) extends only to the naming of the Executive Director of Racing Gaming and Liquor so it is not possible to identify the extent to which the Department allocates resources to gambling harm issues within its structure.

The Department's Annual Report also indicated that the Department attended the "Senior Official's (sic) Working Group for Online Wagering and Harm Minimisation" that was "...a forum to collaborate and progress nationally consistent policy and legislative approaches which prevent and minimise harm from online wagering and to support those experiencing gambling harm.

The Gaming and Wagering Commission (GWC)

The GWC was established in 1987 to administer the law relating to gaming and wagering in Western Australia by the Gaming and Wagering Commission Act 1987. It is specifically tasked in Section 7 (1) (ba):

"to formulate and implement policies for the scrutiny, control and regulation of gaming and wagering, taking into account the requirements and interests of the community as a whole and the need to minimise harm caused by gambling:..."

Section 8 (2) of the Act states: "Without derogating from the generality of subsection (1), the Commission may —

...

- (da) take steps to minimise harm to the community, or any part of the community, caused by gambling; and
- (e) seek, receive, disseminate or publish information relevant to gambling and the incidence of gambling and its effect in the community; ..."

The GWC is required by the Act to ensure the revenues derived from activities covered by the Act are sufficient to cover its operating, administrative and other costs.

In 2022 the GWC adopted a strategic plan with gambling harm minimization as one of its strategic focus areas. The GWC was keen to proactively address the issues of gambling harm.

Until recently the GWC consisted of the Chair and five appointed members. Under the Act the Minister can appoint the Chair and from five to seven members.

The terms of five members ceased on 30 June 2025 and four of the five were reappointed for a further term to 30 June 2026. An additional appointment has been made from 1 July 2025 to 30 June 2026 and a second additional appointment from 4 August 2025 to 30 June 2026, that being the previous Independent Monitor of the Perth Casino. This appointee has been given a fulltime

¹⁸ Western Australia. Legislative Council. Parliamentary Debates (Hansard), February 27, 2024, 389b–390a. [https://www.parliament.wa.gov.au/Hansard/hansard.nsf/0/AE97BA9A639A755248258AF4000FAAD0/\\$FILE/C41%20S1%2020240227%20p389b-390a.pdf](https://www.parliament.wa.gov.au/Hansard/hansard.nsf/0/AE97BA9A639A755248258AF4000FAAD0/$FILE/C41%20S1%2020240227%20p389b-390a.pdf).

appointment co-existing with the role on the Commission. The Government announced the addition of another member to the Commission on 29 August 2025.

The position of Independent Monitor was a full-time position supported by a small secretariat, created by the government on the recommendation of the PCRC to monitor the progress of the casino in implementing the changes recommended by the PCRC. Its term expired in April 2025.

Advocating for community representation in the make-up of the membership of the GWC will be an important component of any advocacy strategy that is developed to support the development of policy on gambling harm prevention and reduction.

The GWC Annual Report¹⁹ sets out the activities undertaken by it, and by the Department on behalf of the Commission. The 2023/24 Report includes a section on harm minimisation activities that are performed by the PGSSC and as indicated earlier the discussion of its activities is contained in the next section.

The Perth Casino Royal Commission was established in 2021 to investigate two areas, the suitability of the current owners of the casino licence to hold it and to assess the adequacy of the framework regulating the casino in Western Australia.²⁰

The Commissioners made the observation that the Commission was the first time since the grant of the casino licence in 1985, save for a 1996 review of the Gaming Commission Act 1987 (WA), that there had been an inquiry into casino regulation. There has been no inquiry into the effects of gambling in general in the State.

The Commissioners detailed the changes required in order for the casino licence holder to be rendered suitable. It stated that there were many changes that require attention, one of which was Perth Casino's gambling related harm program.

In addressing gambling harm, the PCRC devoted one chapter of its report (Chapter 12 Harm Minimisation pages 640 - 731) to the issue and the discussion in that chapter, the recommendations arising from it, the government's response to the recommendations and the ongoing implementation of the recommendations by the government, the Gaming and Wagering Commission and the Department of Local Government, Industry Regulation and Safety largely constitute the current state of gambling harm reduction policy in Western Australia.

The PCRC made 59 recommendations, including recommendations that recommendations from other reports should also be implemented, resulting in over 300 recommendations in total. The recommendations relate to the operations of the casino, but some would impact on the broader issue of gambling harm.

¹⁹ Department of Local Government, Sport and Cultural Industries. Annual Report 2023–24. Perth: Government of Western Australia, 2024, 50. https://prod.dlgsc.wa.gov.au/docs/default-source/the-department-document/departement-of-local-government-sport-and-cultural-industries-annual-report-2023-24.pdf?sfvrsn=1a892b00_1.

²⁰ Perth Casino Royal Commission. Final Report. Perth: Government of Western Australia, 2022, 8. [https://www.parliament.wa.gov.au/publications/taledpapers.nsf/displaypaper/4111048a8d7a626ef0a339594825880f00079102/\\$file/pcrc+final+report+digital.pdf](https://www.parliament.wa.gov.au/publications/taledpapers.nsf/displaypaper/4111048a8d7a626ef0a339594825880f00079102/$file/pcrc+final+report+digital.pdf).

A detailed investigation of the recommendations would reveal that the impact of their implementation would reduce excessive gambling on the part of individuals, and would thus have an impact on prevention of gambling harm.

An example is Recommendation 13 that limits the maximum size of an EGM bet to \$10. Others are the direction to implement carded play for the EGMs, due to come into force on 1 December 2025 that will allow the enforcement of betting limits on the EGMs and limitations on the time patrons can remain at a machine.

A particular recommendation is that relating to the creation of an independent body to conduct research into gambling related issues. The PCRC recommends the current body that has the responsibility of investigating gambling harm should be abolished and replaced by an independent body²¹.

Though the Government supported the recommendation, the Independent Advisory Body is yet to be established. Action to encourage the Government to implement this recommendation is a major first step that needs to be taken and will be raised again in the Section on an advocacy strategy. In creating the body, the government should ensure that representation from the gambling industry is ideally not included in its governing mechanism.

The Government responded to the recommendations in March 2023 accepting all recommendations, with 49 supported, 11 supported in principle and 1 not requiring a response because the Government continued the ban on poker machines in the state²².

While the acceptance by the Government of the recommendations was a critical first step the lack of detail provided publicly about their implementation is concerning.

The Problem Gambling Support Committee (PGSSC)

The Problem Gambling Support Services Committee was established in 1995 under Section 15 of The GWC Act to address issues associated with gambling-related harm in Western Australia.

The PGSSC's mission statement is: To educate the community of Western Australia on the impact and consequences of problem gambling and to facilitate and promote health services available for those people affected by gambling related harm.

The Department's website states PGSSC functions to advise the GWC on issues associated with gambling-related harm through:

- Support services — facilitating and promoting the free support services available for people affected by gambling related harm. These services include a 24-hour confidential telephone helpline, a face-to-face counselling service and contributions to a national on-line counselling service and a national self-exclusion register.

²¹ PCRC Recommendation 14 proposes new Acts and Regulations that are then expanded in detail in Recommendation 15, which contains 28 subclauses. Within the subclauses are actions relating to the establishment of an independent body to conduct research that is pertinent to the issue of gambling harm.

²² Government of Western Australia. Government Response to the Perth Casino Royal Commission. March 2023. <https://www.wa.gov.au/system/files/2023-03/PCRC%20Government%20Response%20-%20Approved.pdf>.

- Education and awareness — raising awareness and educating the WA community on the impact and consequences of problem gambling, including Gambling Harm Awareness Week.
- Research — undertake state-based research to assist in guiding gambling related policy, education and research.
- Additional contributions are made to Gambling Research Australia. While WA contributes to Gambling Research Australia and benefits from its national research outputs, there is no publicly available data detailing how much of GRA’s funding is specifically spent within WA or on WA-targeted projects. This lack of transparency represents an opportunity for advocacy—calling for clearer reporting and more WA-specific investment in future GRA initiatives.
- The various support services and activities are funded by the PGSSC to address gambling related harm in Western Australia.

The Department provides administrative support for the PGSSC.

The Committee expends funds from the Problem Gambling Support Fund, which receives funds through voluntary contributions from the industry.

In 2024 the Fund received \$1,651,661 in contributions and spent \$966,698, ending the financial year with a balance of \$2,739,185.

The Department’s 2023/24 Annual Report states “The PGSSC supports research, education and awareness, and free counselling support for people affected by gambling harm. This includes a 24/7 Problem Gambling Helpline, Gambling Help WA, Gambling Help Online and an annual Gambling Harm Awareness week.”

The current PGSSC membership is:

Chair: Uncertain. DLGIRS originally requested a GWC member to chair the Committee but the member subsequently resigned from the PGSSC and the current status of the position isn’t known.

Member organisations: Crown Perth, Racing and Gaming WA, Lotterywest, WA Bookmakers Association, DLGSC, Department of Communities, Mental Health Commission²³. Although stated as members, the GWC formally withdrew from the PGSSC during 2024/25.

The PGSF provides funding for the following services to gamblers and for research:

- The state’s contribution to funding of the 24/7 online Gambling Help Line, operated by Medibank Health Solutions Telehealth, a national service operated under a Memorandum of Understanding by the States and Territories that is free to users.
- A free face-to-face counselling service operated by Centrecare. This service includes therapeutic counselling and social support as well as community awareness programs.
- Gambling Harm Awareness Week – also called the Responsible Gambling Awareness Week in the GWC Annual Report - that aims to raise awareness of gambling harm impacts.

²³ Gaming and Wagering Commission of Western Australia. Annual Report 2023–24. Perth: Department of Local Government, Sport and Cultural Industries, 2024, 38. <https://www.dlgsc.wa.gov.au/department/publications/publication/gaming-and-wagering-commission-of-western-australia-2023-24-annual-report>.

- The Gamble Aware website^{24 25}

In late 2024 the Committee contracted the Behavioural Insights Team (BIT) to undertake research into gambling in Western Australia. BIT advised:

“Our research is focused on understanding the prevalence of gambling and gambling-related harms in Western Australia, the factors contributing to risky gambling behaviours, and the potential impact on individuals, families, and communities. This work is being undertaken on behalf of the Department of Local Government, Sport and Cultural Industries (DLGSC) and includes a state-wide survey as well as semi-structured interviews with a range of stakeholders. The insights from this research will inform government strategies to minimise gambling harm.”²⁶

The GWC Annual Report claims: “This research is the first time that a focus has been made on gambling harm within Western Australia.”²⁷

This research has been completed and the report of the project has been provided to the GWC and to all members of the PGSSC, as well as the Australian Institute of Family Studies (AIFS). The Department has not released the report publicly though members of the Committee have used findings from the report in public statements.

The Annual Report also states “In response to the findings of the PCRC, it is planned that the PGSSC will remain in place until the establishment of an Independent Advisory Board to be responsible for implementing programs to mitigate gambling-related harm in Western Australia.”²⁸

The Sports Wagering Account

The Account was created by Section 110A of the GWC Act. The Department provides the Minister of Sport and Recreation with advice on the grants to be funded, and following approval by the Minister, issues and manages the grants.

The Sports Wagering Account receives an annual appropriation from Treasury. Dividends, fixed odds winnings and refunds paid by RWWA in respect of wagers made on sporting events, which remain unpaid, are paid into the Account.

The grants support sport and recreation activities.

In 2023-24 125 individual grants funded from the Account amounted to \$4,962,675.²⁹

²⁴ GambleAware – Helping You Stay Safe.” Accessed August, 2025. <https://www.gambleaware.com.au/>.

²⁵ Gaming and Wagering Commission of Western Australia. Annual Report 2023–24. Perth: Department of Local Government, Sport and Cultural Industries, 2024, 38. <https://www.dlgsc.wa.gov.au/department/publications/publication/gaming-and-wagering-commission-of-western-australia-2023-24-annual-report>.

²⁷ Gaming and Wagering Commission of Western Australia. Annual Report 2023–24. Perth: Department of Local Government, Sport and Cultural Industries, 2024, 39. <https://www.dlgsc.wa.gov.au/department/publications/publication/gaming-and-wagering-commission-of-western-australia-2023-24-annual-report>.

²⁸ Gaming and Wagering Commission of Western Australia. Annual Report 2023–24. Perth: Department of Local Government, Sport and Cultural Industries, 2024, 38. <https://www.dlgsc.wa.gov.au/department/publications/publication/gaming-and-wagering-commission-of-western-australia-2023-24-annual-report>.

²⁹ Gaming and Wagering Commission of Western Australia. Annual Report 2023–24. Perth: Department of Local Government, Sport and Cultural Industries, 2024, 46. <https://www.dlgsc.wa.gov.au/department/publications/publication/gaming-and-wagering-commission-of-western-australia-2023-24-annual-report>.

At the end of 2024 the GWC Act was amended to remove the GWC from having responsibility for these Accounts³⁰. Responsibility now lies with the Department, which also administers the Sports Lottery Account.

Racing and Wagering Western Australia (RWWA)

RWWA is the controlling authority established under the Racing and Wagering Western Australia Act (2003) for thoroughbred, harness and greyhound racing in Western Australia.

The Act provides for the Authority to regulate the totaliser agencies through which betting on horse and greyhound racing is conducted. It owns and operates the Totaliser Agency Board that manages the operations of the totaliser agencies.

The RWWA webpage under the heading Wagering Harm Minimisation states:

“We are committed to supporting the communities in which we operate and acknowledge our moral and social responsibilities to promote and encourage responsible behaviour in the community and to our customers.

Our Responsible Wagering Program takes a holistic approach to harm minimisation by:

- Actively promoting a view of shared responsibility.
- Empowering our customers to self-regulate and exclude.
- Operating in real time, enabling us to act swiftly, make informed decisions and cater to the individual needs of each customer.”³¹

It also refers to its participation in the PGGSC, the contributions it makes to the Problem Gambling Support Fund operated by the Committee and the activities supported through the Fund.

Identifying Opportunities for Change in Gambling Harm Prevention and Responses in WA

Western Australia is at a critical juncture in its approach to gambling harm prevention and response. While other jurisdictions have made significant progress in developing coordinated policies and strategies, WA continues to face gaps in regulation, service integration, and sector-wide collaboration. This section explores a range of actionable opportunities to enhance the state’s response to gambling-related harm. These include improving coordination between state and federal governments, expanding the scope of regulation beyond casinos to include online gambling, lotteries, and sports betting, and embedding gambling harm into the strategic priorities of community and public health services.

³⁰ Racing and Wagering Western Australia. “Wagering Harm Minimisation.” Accessed August, 2025. <https://www.rwwa.com.au/community/wagering-harm-minimisation>.

³¹ Racing and Wagering Western Australia. “Wagering Harm Minimisation.” Accessed August, 2025. <https://www.rwwa.com.au/community/wagering-harm-minimisation>.

It also highlights the need for inclusive governance structures, including an independent advisory body with representation from affected communities and calls for investment in research to better understand the true costs of gambling harm. Drawing on both local context and international experience, this section outlines practical pathways for reform and innovation in WA's gambling harm reduction efforts.

Consultation with the Departments of Health and Communities and the Mental Health Commission

A consultation session with the representatives of the Departments of Health and Communities and the Mental Health Commission was conducted on 2 April 2025.

Following the session, statements were received by email summarising the position of the Departments and the Commission. The Department of Health comments were received first and were endorsed by the Mental Health Commission and the Department of Communities (who also endorsed the Mental Health Commission points). The points made in the statement are summarised as³²:

Department of Health

- Data on gambling is not collected through the Department of Health administrative data sets (deaths and hospitalisations, population surveys).
- The Department is not aware of any other data systems administered by it that would provide some indication of demand and costs to the health system of gambling related harm.
- Capture of data on gambling through health administrative data systems is not recommended and unlikely to be supported.
- The welfare and health harms of gambling however are well documented, albeit through independent studies and not necessarily specific to WA.
- Traditionally gambling harm has been regarded as an individual and social issue. Public policy and programs have been predominantly focused on regulation and provision of counselling support for 'problem gamblers'.
- The Department of Health is not indifferent to the health harms associated with gambling.
- Department of Health is aware of the PCRC report and potential benefits of a public health approach to minimising gambling harm that was explored in the report, although the concept and its application to gambling is not well-defined in the report.
- The Department of Health's remit currently does not extend to gambling harm, which would be a matter for the government and minister of the day.

Mental Health Commission

- Gambling is not a metric that Mental Health Commission commissioned services look for when collecting and reporting on data, though gambling as a contributing factor to an individual reason for presenting to a mental health or Alcohol or Other Drug (AOD) service in the community is not dismissed.

³² A consultation session with the representatives of the Departments of Health and Communities and the Mental Health Commission was conducted on 2 April 2025.

- Occasionally a service mentions problem gambling as a reason someone has presented to a mental health or AOD service but its anecdotal and infrequent.
- Individual notes may contain more detail but accessing the notes would not be feasible.
- A public health approach to messaging around gambling harm would be valuable, based on the experience in reducing alcohol availability and related harms but would be a longer term action.

Department of Communities

- The Department of Communities acknowledges problem gambling as a potential contributing factor to many of the issues impacting the people to which Communities provides supports.
- In 2024, the Commonwealth Government’s Rapid Review of Prevention Approaches Panel identified AOD and problem gambling as factors contributing to Family and Domestic Violence (FDV).
- The Department concurs gambling is relevant to the extent it creates additional stress and strain on families (which can impact frequency and severity of FDV if this is a pre-existing issue).
- Coercive control can lead to victim-survivors having their money taken to enable problem gambling.
- Problem gambling is considered alongside other contributing factors in the development of policy and programs to support Western Australians.
- No specific data is collected regarding problem gambling as a standalone issue, however it may be included in case file notes if relevant or appropriate. The Department of Communities cannot aggregate that data other than a manual search of every individual case file.

The Community Services and Public Health Sectors

The community services and public health sectors in Western Australia include a large number of predominately not-for-profit organisations established to provide a range of services that support the Western Australian community, many of whom find their services are required as an outcome of gambling. There are no organisations established primarily to address gambling harm³³.

Consequently, the issue of gambling is not addressed in any coordinated mechanism, policies or strategy documents produced by the organisations. This means that though many organisations are seeing the effects of gambling harm on the community there is currently no coordinated response to advocate for more resources to address the underlying issues.

The organisations working in the areas impacted by gambling harm – health including mental health, finance, employment, the legal system, community welfare, domestic violence, homelessness – are all cognisant of the impact gambling has on the clientele that seek their services. All are wanting the issue to be addressed and are sounding the alarm.

However as gambling support is not their core service they don’t have policies, strategies or funding that directly relate to reducing gambling nor are they taking action that addresses the issue. Most

³³ This section is based on a number of consultations with the sector.

are prepared to be involved in action to prevent and reduce gambling harm, but all are constrained by a lack of resources to devote to the issue.

Many are not able to attribute the cause of the problems their clients are experiencing to gambling, due to a third party being the gambler and thus not the one who is presenting as the client. All organisations noted they were unable to collect statistics that would identify gambling as the cause of the problems.

There are some exceptions to this, including Centrecare has a contract with the Department to provide gambling support services to gamblers in Western Australia so is also obtaining data on gambling harm. The experience of Centrecare could be used to develop the case for more action to be taken on gambling harm in the state. Centrecare acknowledges the impact that gambling is having on the users of the other services it provides in its role within the community services sector, and is supportive of action being taken to address issues relating to gambling harm.

The Financial Councillors Australia representatives have made a strong case for the training of front-line staff in gambling harm related issues to assist them recognise when a client is presenting due to gambling issues, and how to respond appropriately to the situation so that not just the primary issue of the presentation is dealt with but also the underlying issue of gambling harm is addressed.

Research Being Conducted in Western Australia

The independent research on gambling related issues in Western Australia focuses on the techniques the gambling industry uses to increase gambling activity and involvement. There does not appear to be any research being conducted on the harm gambling causes in the community or the extent of gambling that is occurring. Researchers from Curtin University participated in one of the consultation sessions, and indicated their interest in conducting research into gambling harm in Western Australia if the opportunity arose.

The BIT research being carried out on behalf of the Department is funded by contributions from the industry to the PGSSC. This research should be made public to enable it to be assessed by independent personnel before it is used by the government to inform policy development on gambling harm. The research is potentially a valuable addition to knowledge of gambling harm in Western Australia.

Healthway has funded Curtin University to investigate how WA young people's exposure to gambling marketing influences their intention to gamble, with the aim of guiding policy interventions to reduce health and social harms³⁴

State Government

As discussed earlier the areas of gambling for which the State Government has responsibility are primarily the casino, the TAB and oncourse betting and the lotteries.

Reducing harm arising from gambling at the casino is currently the subject of a substantial legislative program resulting from the State Government's acceptance of the recommendations of the PCRC. Identifying additional changes to casino practices to further reduce gambling harm would be resource intensive. DLGIRS has extensive resources devoted to drawing up the legislative and regulatory clauses required to implement the changes and the State Government does not appear to

³⁴ Curtin University. "New Curtin Research to Address Damaging Marketing to WA Children." Media Release, July 27, 2022. <https://www.curtin.edu.au/news/media-release/new-curtin-research-to-address-damaging-marketing-to-wa-children/>

have any concerns that issues of substance will persist following the passage of the changes through Parliament.

When it comes to the TAB and on course betting at both forms of animal racing, a review of the contribution of these areas of gambling to gambling harm may warrant further investigation if resources are available. With respect to the lotteries, there is some anecdotal evidence that in some communities gambling harm is resulting from excessive participation in lottery games. Lotteries therefore are also an area that bears investigation, should resources permit, to identify the gambling harm that may be occurring.

An emerging area of concern is online gaming involving children and young people. Although not directly related to gambling harm there is some evidence that participating in online gaming is a precursor to participation in online gambling, and in some cases the games actually involve gambling-like components and rewards. Further investigation of this area to identify potential harms is warranted.³⁵

Fiona Stanley was the first public hospital in Australia to open a Gaming Disorder Clinic, as part of its Addiction Prevention Treatment Service Outpatient Clinic. The clinic provides consultation, assessment and care for patients with emerging or dependent alcohol and other drug (AOD), behavioural harm and/or addiction.

For the Western Australian context, there are two actions the State Government needs to take immediately. They are the release of the DLGIRS research into gambling harm conducted by BIT and the establishment of the independent advisory body recommended by the PCRC.

The research will give agencies and the not-for-profit sector information and knowledge about where gambling harm is having the most impact and where scarce resources can be targeted with maximum benefit.

The independent advisory body is essential to conducting ongoing research to identify gambling harm and to creating the advice on the actions to be taken. Without the body, the WA community will not have the information needed on where to direct resources, nor an adequate understanding of what gambling is really costing the community.

The State Government is primarily responsible for funding services addressing the harms caused by gambling, however it should increase the funding available to the not-for-profit sector to enable it to fully address the service level requirements that gambling is creating. More is said on this in a following section.

The conducting of a public health campaign on the effects of gambling harm would be beneficial in reducing the impact of gambling, and the State Government implementing such a campaign is one possible policy approach as part of an integrated approach to addressing gambling harm, similar to its road safety campaign, that should be considered.

Federal government

Online gambling regulation is the responsibility of the Federal Government and it is currently from this area where the most damaging harm is occurring. Widespread advertising and the association of

³⁵ <https://news.wapha.org.au/establishing-the-gaming-disorder-clinic-at-fiona-stanley-hospital-clinician-reflections/>

gambling with sport are creating significant concern within the community and little seems to be being done to combat it.

The Murphy Report provides the government with the blueprint for action to reduce the harm. To this point, the industry lobby appears to have persuaded the government not to address the recommendations in the report. Politically, this is the most difficult area in which to attempt reform and it cannot be done by the State alone.

It will take considerable campaigning and the development of significant community pressure to bring about change but this is where the effort should be directed, and the State Government needs to participate in addressing the issue.

Community Services and Public Health Sectors

Community services and public health sectors provide a range of services, supports and advocacy impacted by gambling but are not structured to deal with gambling harm directly.

To enable the sectors to properly identify and respond to the harm gambling is causing there needs to be recognition by funding agencies, and funds allocated to enable the issues to be addressed.

Community service organisations need a mechanism for coordinated approach to advocating for reducing gambling harm in order to tackle the issue effectively.

Comments made in consultations suggest the training of frontline staff is an area of change that could be addressed. While front line staff may suspect gambling is behind the reason a client or an acquaintance of Client is representing to obtain help, the staff are neither trained in recognition nor in how to deal with gambling where it is evident it is the cause of the problem. Funding agencies providing funds for training staff in this area would be a significant step forward in having gambling harm addressed.

The sector organisations could also assist by recognising in their own policies and strategies that gambling is a significant factor in the presentations of their clients. As well, collecting anecdotal evidence and recording information about gambling effects would contribute to building the case for gambling harm to be addressed.

Research into the impact of gambling harm in Western Australia will help identify the changes needed to WA's gambling regulations and to the services to community members impacted by gambling. Statistics on gambling amongst Western Australians are limited, making it difficult to assess the extent of the issue and how the impacts are experienced. There is therefore an opportunity to undertake research on the effects of gambling on Western Australians, both the gambler and the associates of the gambler, to understand what is happening and to identify where the costs fall in the Western Australian community.

The not-for-profit sectors should be represented on the GWC and the independent advisory body to ensure they are across and influence the decision-making affecting the Government's approach to regulating gambling. The resources the Government devotes to gambling issues are directed through these bodies and that is where influence can be exerted.

Conducting research into gambling-related harm

More statistics and evidence are required on the extent of gambling, the amounts being wagered and lost and the numbers of Western Australians presenting for assistance, the type of assistance, and the cost of the services required.

For instance, the August newsletter of the Alliance for Gambling Reform quotes recently released figures compiled by the Victorian Government on the social cost of gambling – the only state to routinely measure the impact on the community.

“It showed Victorians lost over \$7 billion to gambling every year and the State Government reaped \$2.2 billion a year in revenue, but the social cost (bankruptcy, marriage break up, domestic violence etc.) totalled a whopping \$14 billion”³⁶. Western Australia needs to undertake this type of analysis.

The research needs to reveal at a minimum the:

- Cost of domestic violence caused by gambling
- Cost of the mental health effects of gambling
- Cost of homelessness and housing related issues
- Legal and incarceration costs for gambling related crimes
- Legal costs for issues arising from gambling
- Number of people taking their lives as a result of gambling (or words to that effect)
- Financial costs to individuals arising from gambling

The research also needs to identify where the costs fall, to individuals, the Government and the community services and public health sectors.

Due to the difficulties associated with identifying the costs, extrapolations and imputed values may be needed to gain an adequate understanding of gambling harm costs to the community.

Potential Areas for Reform

International experience points to potential areas of consideration for change in current gambling legislation and regulation.

European nations have impacted gambling harm by addressing:

- **Financial Limits:** Requiring gamblers to have accounts that incorporate caps based on income and asset considerations beyond which operators cannot accept bets.
- **Licensing Requirements:** Online gambling operators must obtain licenses, often multiple, which come with specific compliance obligations. These can be operating and activity-based licenses.
- **Minimum Age Limits:** The legal age for gambling typically ranges from 18 to 21 years, with player verification often required.
- **Game-Specific Regulations:** Some countries permit all forms of online games, while others only allow certain types.
- **Marketing and Advertising Controls:** Certain nations, such as Belgium, the Netherlands, and Italy, impose strong restrictions on gambling advertising, especially for sports betting.
- **Blocking Unlicensed Operators:** Some jurisdictions block the IP addresses of foreign gambling sites, partly to ensure tax compliance.
- **Cross-Border Service Limitations:** Countries can restrict cross-border gambling services but may need to justify these restrictions and prove their suitability.

Some Australian States have strategies addressing gambling harm reduction and prevention, for instance:

³⁶ Alliance for Gambling Reform. “August 2025 Newsletter.” Accessed August, 2025. <https://www.agr.org.au/newsletters-1>.

- **Reducing Gambling Harm in Victoria: Outcomes Framework** - sets out the Victorian Responsible Gambling Foundation and its partners intentions to reduce the number of Victorians experiencing harm from gambling and reduce the social, health and economic cost of gambling harm across Victoria. It does this by setting an outcomes based approach, whereby the outcomes that lead to the prevention and reduction of gambling harm are examined and set as the objectives to be achieved.³⁷
 - **Minimising Gambling Harm in South Australia: Investment Plan 2021-2026** - outlines steps toward activities to prevent and minimise gambling harm in South Australia. The plan prioritises actions that: raise awareness of gambling harm and deliver prevention and early intervention responses.
 - **Strategy for Gambling Harm Prevention in the ACT: A public health approach 2019-2024** - the Strategy provides the ACT Gambling and Racing Commission with an evidence-based, practical plan for applying a public health approach to preventing gambling harm in the ACT community. It also provides a roadmap for the Commission to work towards achieving its vision of a Canberra free from gambling harm³⁸.
 - **ACT Gambling and Racing Commission Research Agenda 2021-2024** – as part of the Strategy, the Commission established a Fund to support research into gambling harm related issues. This document sets out the areas of research it would attempt to fund through the period. The Agenda states “Through the Gambling Harm Prevention and Mitigation Fund, the Commission encourages organisations and individuals to take part in building the evidence base to inform the initiatives designed to prevent and reduce gambling harm in the ACT.” The themes of research included monitoring, community impact, modes of gambling, harm prevention and treatment and support.³⁹
 - **Gambling Harm Minimisation Plan for Queensland 2021-2025** – Queensland has a public health approach to gambling harm minimisation. “A public health approach provides a holistic view of problem gambling and its determinants and emphasises the value of interventions at the individual and community levels, in the gambling and built environments, and in health and welfare support systems.”⁴⁰
- Specific areas of concern that have been raised during consultation for this report that need particular consideration in the Western Australian context include:
 - Fly In Fly Out (FIFO) workers. Anecdotal reports indicate that once shifts are finished, FIFO workers with little else to do are attracted to gambling online. For those servicing these workers there is growing concern that this behaviour is negatively impacting the

³⁷ Victorian Responsible Gambling Foundation. Reducing Gambling Harm in Victoria: Outcomes Framework. Melbourne: Victorian Responsible Gambling Foundation, 2022. https://responsiblegambling.vic.gov.au/documents/1030/VRGF_Reducing_gambling_harm_in_Vic_2022_FINAL_MARCHweb.pdf.

³⁸ ACT Gambling and Racing Commission. Strategy for Gambling Harm Prevention in the ACT: A Public Health Approach 2019–2024. Canberra: ACT Government, 2019. https://www.gamblingandracing.act.gov.au/__data/assets/pdf_file/0009/1436580/Strategy-for-gambling-harm-prevention.pdf.

³⁹ ACT Gambling and Racing Commission. Research Agenda 2021–2024. Canberra: ACT Government, 2021. https://www.gamblingandracing.act.gov.au/__data/assets/pdf_file/0007/1776157/Research-Agenda-2021-2024-FINAL.pdf.

⁴⁰ Queensland Government. Gambling Harm Minimisation Plan for Queensland 2021–2025. Brisbane: Department of Justice and Attorney-General, 2023. <https://www.publications.qld.gov.au/dataset/gambling-harm-min/resource/84d444db-97e0-4be0-8e87-0c6f0cb412d6>.

lives of these workers. FIFO work already imposes significant strains on the relationships of these workers and the added stress associated with gambling losses is unhelpful.

- Gambling in Aboriginal communities. Anecdotal evidence of card playing and lotteries gambling is beginning to surface about the activities occurring in remote communities.
- Gaming amongst young people leading to gambling. Gaming addiction is becoming a treatable disease that is also impacting gambling behaviour. Many games encourage participation through the offer of returns for achieving certain outcomes, thus preparing young people for future gambling activity.

More research needs to be undertaken to better understand the risks from gambling in these cohorts of the population which can then lead to proposals for change to improve the response to gambling harm in Western Australia.

Advancing Gambling Harm Prevention and Response in Western Australia: Building a More Coordinated, Inclusive, and Evidence-Informed Approach

The findings from this research will be used to guide advocacy efforts focused on addressing and preventing gambling related harms on individuals, their families and the community.

Project findings will enable the development of an advocacy strategy designed to progress gambling reform in WA and ensure the needs of those most at risk of gambling harm are prioritised in commercial decisions, the policy landscape, and legislative and regulatory contexts.

It is clear that a more collaborative and coordinated approach to gambling advocacy in WA is desperately needed. Such an approach will reduce inefficiency and maximise the potential for impact.

This section considers possible approaches and priorities for effectively addressing and reducing gambling related harm in WA.

Goals for addressing gambling related harm in Western Australia

a. Implementing the Recommendations for the Murphy Report

Advocate for the full implementation of the Murphy Committee's recommendations by state, territory, and Commonwealth governments, with a particular focus on those measures that will have the greatest national impact on reducing gambling-related harm. These include especially phasing out advertising, a comprehensive national strategy, establishing a national regulator, and delivering research-based public education.

It is clear that a chief concern for the WA community is the gambling harm arising from online gambling. Implementing the recommendations of the Murphy Report is therefore a vital step in addressing this issue.

b. Increasing Public and Government Awareness of Gambling-Related Harm in Western Australia.

Promote broader public understanding of the personal, social and community impacts of gambling harm in WA, while advocating for increased recognition and responsiveness from Government stakeholders. This includes highlighting the systemic nature of gambling-related harm and encouraging policy and funding initiatives that reflect its significance as a public health and social issue.

The community and governments understanding of gambling harm needs to be developed. Impacts are masked by the harms not being recognised as being caused by gambling – suicide, depression, mental illness, poverty, homelessness, domestic violence, indebtedness and crime may result from gambling but they are not reported as such.

c. Development and Public Release of Research on Gambling Harm in Western Australia

Encourage the commissioning and public sharing of evidence-based research that examines the impacts of gambling harm, industry tactics, prevention approaches, and the availability and effectiveness of support services.

d. Explore Legislative Options to Regulate Gambling Advertising and Promotion in Western Australia

Undertake a review of potential state-level legislative measures to address the regulation of gambling advertising and promotional activities. This should include consideration of jurisdictional challenges, and assess opportunities to strengthen consumer protections and reduce exposure to gambling-related harm.

Gambling advertising, mainly relating to online betting, is a major issue with the public. It has also been identified internationally as a major issue that should be addressed.

As the Murphy Report found, and as international and Australian research has indicated, online gambling is proliferating due to the extensive advertising the industry is undertaking. Some European countries either outright ban gambling advertising, or restrict it to timeslots away from common viewing hours.

3. Cross-Sector Commitment to Address Gambling-Related Harm

Encourage coordinated action across key social policy sectors, including Mental Health, Alcohol and Other Drugs (AOD), Housing and Homelessness, Financial Counselling, Aboriginal Health, and Family and Domestic Violence, to recognise and respond to gambling-related harm. This includes integrating gambling harm into relevant strategies, frameworks, and action plans to ensure a holistic and inclusive approach to prevention and support.

Consultation with organisations working in the community services and public health sectors and examination of their publicly available documentation has revealed that most have yet to establish policies or strategies relating to gambling harm though they are aware of gambling as a significant cause of the difficulties their clients are experiencing, and are increasingly aware of the impact that gambling is having on their clientele.

4. Establishing a coordinated advocacy mechanism in the Western Australian Not-for-Profit Community Services and Public Health Sectors

A coordination mechanism within the sectors is required to undertake the work of developing and implementing the advocacy strategy.

A coordination mechanism may be created in numerous ways, but three possible options are:

- An existing organisation such as an existing peak council be commissioned to take on the role as part of its existing portfolio of activities.
- An existing organisation established elsewhere that has as its focus the reduction of gambling harm be asked to establish itself in Western Australia.
- The community services and public health sectors create a specialist organisation in Western Australia to take on the role.

The advantages of an existing organisation in WA taking over the responsibility for the work is that it would already have the administrative and governance structures in place to supervise the work.

The third option is the creation of an organisation under the Western Australian legislation that establishes associations to undertake the task.

An example is the Australian Council on Smoking and Health (ACOSH), which was established in Western Australia in 1970 to take on the role of campaigning for the elimination of smoking. It is an Association registered under the Associations Act of Western Australia and has as members either individuals or organisations that are active in the area of smoking related illnesses.

Such an organisation might be the Alliance for Gambling Reform that was originally established to address gambling reform in Victoria but has now taken on a national role. It has offered to employ a staff member in Western Australia to take on the coordination role.

The issue with this option is that though it has the administrative structure in place to support the position, it may have policies and strategies that are not applicable to Western Australia.

These options are not mutually exclusive. The options could be adopted as funding becomes available to support whichever is deemed appropriate, with lower cost options being used to commence the search for funding.

5. Funding for Service Coordination and Targeted Workforce Training to Address Gambling-Related Harm

Advocate for dedicated funding to support the coordination of community services and the delivery of targeted training across sectors. This will strengthen the capacity of frontline workers and organisations to identify, respond to, and prevent gambling-related harm through integrated and informed approaches.

Neither the public health nor the community services sectors have the resources needed to address gambling harm reduction.

Without resources the sectors are unable to devote time and energy to seeking to address gambling related harm, even though all organisations working in the sectors know that gambling is the root cause for a number of the clients seeking their services.

A key issue raised by the sectors was that their frontline staff are not provided with training that supports them recognising gambling harm as a casual factor in client presentation, nor if recognised how to address the issue.

6. Independent Decision-Making and Inclusive Representation in Gambling Harm Policy and Governance

Advocate for a clear commitment that the gambling industry should not be involved in any decision-making related to the prevention and reduction of gambling-related harm. Relevant governance and advisory bodies should include diverse community representation including public health experts, service providers, researchers, young people and individuals with lived

experience to ensure policy and decisions are transparent, evidence-informed, and aligned with community needs.

Allowing gambling industry representatives to shape public policy on gambling harm presents a significant conflict of interest. The primary objective of the gambling industry is to generate profit, which can be at odds with public health and harm minimization goals. While the industry may frame gambling harm as a matter of individual responsibility, public health approaches recognize it as a broader health and well-being issue.

Policies influenced by the industry are unlikely to prioritize effective harm reduction measures that could impact the industry's bottom line. Policies must be guided by independent public health experts and evidence-based research, not by the very entities that benefit from increased gambling activity.

Involving individuals with lived experience of gambling harm in the development of public policy is crucial for creating effective and comprehensive harm reduction strategies. These individuals offer unique and powerful insights that can inform policy in ways that academic research or industry perspectives cannot. Their firsthand accounts of the impact of gambling, including escapism and the internalization of harm with identity, provide a qualitative understanding of the issue that is essential for designing effective interventions.

7. Support the development and implementation of research-informed warning messages across all forms of gambling product promotion.

These messages should be grounded in behavioural science and public health evidence, designed to counteract the misleading nature of gambling advertising and raise awareness of the risks associated with gambling. Consistent, prominent, and well-tested warnings—similar to those used in tobacco and alcohol regulation—can play a critical role in shifting public perceptions, reducing stigma, and encouraging help-seeking behaviour.

Stakeholder Mapping

This section provides a list of the organisations that could potentially be involved in addressing gambling harm reduction and prevention in Western Australia, including those whose services are being impacted by gambling harm.

In addition to the government and public sector agencies involved, it indicates the community service organisations likely to be receptive to a request to become involved in advocacy efforts to address gambling harm.

Five organisations receive funding from the State Government specifically on gambling harm activities – WACOSS (this project), Curtin University, Marra Worra Worra, Cyrenian House and Centrecare.

Federal Government Minister

Minister for Social Services Tanya Plibersek

Federal Government Departments and Agencies

- **Department of Social Services (DSS):** The DSS has lead responsibility for the Australian Government's online gambling harm minimisation agenda and provides

advice on the regulation of interactive gambling services and harm minimisation initiatives like BetStop – the National Self-Exclusion Register. They also oversee gambling reforms and provide access to the National Gambling Helpline.

- **Australian Communications and Media Authority (ACMA):** ACMA is responsible for media and communications regulation, including monitoring and enforcing interactive gambling laws, which cover online and telephone gambling. ACMA also administers BetStop, the National Self-Exclusion Register.
- **Australian Transaction Reports and Analysis Centre (AUSTRAC):** AUSTRAC is the regulator responsible for anti-money laundering and counter-terrorism financing (AML/CTF) in Australia, which includes monitoring certain gambling activities classified as "designated services" under relevant legislation.
- **Australian Competition and Consumer Commission (ACCC):** The ACCC is responsible for enforcing Australian consumer protection laws under the Competition and Consumer Act 2010, including monitoring gambling service providers' compliance with consumer protection obligations related to advertising.

State Government Relevant Ministers

- Minister for Racing and Gaming – Paul Papalia
- Minister for Mental Health, Health – Meredith Hammat
- Minister for Preventative Health – Sabine Winton
- Minister for Community Services – Matthew Swinbourn

State Government Agencies

Departments

Local Government, Industry Regulation and Safety (was Department of Local Government Sport and Cultural Industries)

- Racing and Gaming Division – formulates policy and develops legislation and regulations, enforcement actions
- Problem Gambling Support Services Committee – utilises voluntary funds contributed by the gambling industry to provide gambling support services and research into gambling harm

Health – collects statistics on health that need to be adjusted to reveal the impact gambling has on the health of Western Australians. Provides policy advice to the government on health-related issues.

Communities – linking the causes of community issues to gambling. Provision of policy advice on community matters to the government.

Education – adoption of strategies to incorporate gambling harm messages into the education system. Identifying gaming as an issue of concern for young people.

Justice – identification of gambling as a cause of illegal activity such as fraud and provision of policy advice to government.

Commissions and Other Agencies

- Gaming and Wagering Commission
- Racing and Wagering Western Australia (including the TAB)
- Lotterywest Commission:
- Healthway

- Mental Health Commission
- Commissioner for Children and Young People

Community Service Organisations

The organisations listed here likely experience the effects of gambling harm on the services they delivery. They are the most likely to be receptive to working with efforts to raise gambling harm as an issue in the community and to join advocacy efforts to persuade governments to act. These organisations by and large have yet to overtly address gambling harm as an issue and should be encouraged to do so. They include:

- Advocare
- Anglicare WA
- Centrecare
- The Centre for Women’s Safety and Wellbeing
- Community Legal WA
- The Consumer Credit Legal Service
- Council of Aboriginal Services WA
- Ethnic Communities Council WA
- Financial counselling Association of WA
- The Financial Wellbeing Collective
- Marra Worra Worra (Kimberley)
- Men’s Health and Wellbeing Western Australia
- Multicultural Communities Council of WA
- Salvation Army
- The WA Network of Alcohol and other Drug Agencies (WANADA)
- The Western Australian Association for Mental Health
- Western Australian Council Of Social Services (WACOSS)
- The Women’s Legal Service WA
- Youth Affairs Council of WA

Public Health Services

- WA branch of the Public Health Association
- AMA (WA): The Australian Medical Association (WA)
- The Australian Health Promotion Association

AFGA: the Alliance for Gambling Reform is a national advocacy organisation working to reduce gambling harm in Australia.

Unions

- Unions WA: the peak council of the union movement in Western Australia
- UWU: United Workers Union represents the majority of workers in the gambling industry
- AWU: Australian Workers Union is a large union representing non-trade workers particularly in the mining industry
- AMWU: Australian Manufacturing Workers Union – represents trades in the metals and fabrication industries, including the mining industry

- CFMEU: the Construction, Forestry and Maritime Employees Union is the construction industry trade union
- ETU: Electrical Workers Union representing electricians

Research Organisations

Curtin University: Curtin School of Population Health - undertaking research investigating how WA young people's exposure to gambling marketing influences their intention to gamble, with the aim of guiding policy interventions to reduce health and social harms.

Deakin University: institute for Health Transformation – aims to strengthen health systems by transforming how health prevention and care is designed and delivered, both in Australia and around the world.

Concluding Comments

The A Path Forward for Reducing Gambling Harm in Western Australia report provides a step toward building a more coordinated, inclusive, and evidence-informed approach to gambling harm prevention and advocacy in the state. By identifying key leverage points across policy, practice, and legislation, the project lays the groundwork for strategic approaches that reflects the unique challenges and opportunities within the Western Australian context.

The findings underscore the urgent need for a comprehensive public health response to gambling harm in WA. Despite growing evidence of widespread impacts—ranging from financial hardship and mental health issues to social disruption—current government responses remain limited in scope, with a narrow focus on casino regulation and insufficient attention to emerging risks such as online gambling. The lack of strategic coordination and sustained investment has left many vulnerable groups without adequate support.

This report calls for meaningful change, including support for national reforms such as those outlined in the Murphy Report, stronger regulation of gambling advertising, and the establishment of a dedicated organisational structure to lead harm reduction efforts in WA. It also highlights the importance of cross-sector collaboration, inclusive representation in decision-making, and funding for service coordination and workforce development. By advancing these priorities, Western Australia can move toward a more effective, equitable, and sustainable approach to reducing gambling harm and protecting community wellbeing.

Further Information

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Our Vision

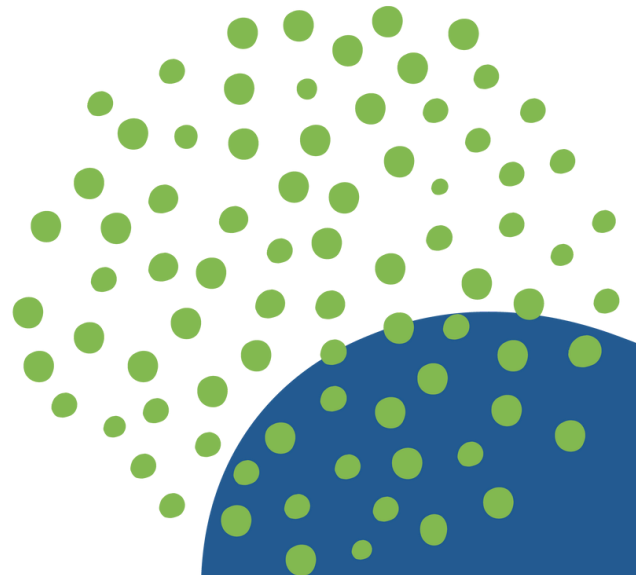
Financially resilient Western Australians with reduced financial hardship.

Our Purpose

- Advocating for financial wellbeing.
- Promoting excellence and compliance in the financial counselling sector.
- Providing the voice of financial counselling in Western Australia.

Our Values

Integrity | Leadership | Support | Innovation





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