

Draft Alcohol and Gambling Policies

ENGAGEMENT SNAPSHOT

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WHEN: Wednesday, September 20 to Tuesday, October 10, 2023

ENGAGEMENT METHODS: To encourage residents to get involved, we promoted the opportunity for people to have their say through our communication channels, including public notices, emails, social media and a have your say page on makewodongayours.com.au.

RESPONSES

3 submissions through Make Wodonga Yours

3 email submissions

COMMUNICATIONS

2871 emails

47.84% average open rate

10 click-throughs

3 Facebook posts

900 reach

2 likes and reactions

2 Instagram posts

276 reach

1 likes and reactions

2 LinkedIn posts

869 impressions

76 likes and reactions

182 website visits

99 unique pageviews

1 public notices

CITY OF WODONGA VIC



Draft Alcohol and Gambling Policies

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FEEDBACK - DRAFT GAMBLING POLICY

ANONYMOUS

Thank you for inviting us to respond to the draft policy. We have read it through, considered the specific situation that we have in the area, and compared the proposal to other council policies. We have a few suggestions that we think would strengthen the policy.

1. Context or the Why
   a. Is the policy a box-ticking exercise or is a framework to inform, guide and effect change in the community? Has Wodonga Council undertaken any studies on this issue? As it stands, there is no sense in the policy as to why the policy is needed for the Wodonga community and if there is no need then why have it at all?
   b. We suggest the policy makes clear the context that Wodonga citizens live in when it comes to gambling, this type of mission statement would include aspects of Wodonga culture such as the facts (numbers of machines, number of venues and access, density, losses per capita); the history of the area (the 'rivers of gold' flowing into the NSW Clubs across the river since 1956); and the revenue that relevant levels of government receive from the gambling industry. A snapshot of the past, present and future community well-being, will give the policy a reason to exist and give those who are implementing it, clear guidance when weighing decisions.
   c. The essence of the cultural impact in the Wodonga area is the proximity of Albury (NSW) and the Murray/Riverina area. While we don't suggest that Wodonga Council take on the whole of the border area, the reality is the only way any public health approach to gambling is going to work is if it is done in conjunction with Albury Council and if they also develop a Gambling Harm Reduction policy.
2. Does Wodonga Council want to reduce gambling harm? If so, you could nail your colours to the mast by changing the name of the policy to something like 'Gambling harm reduction' policy rather than the more neutral 'gambling' policy.
3. Will there be an action plan? In other words, how are you going to put these principle statements into effect and how are you going to measure the effectiveness of the strategies? At the moment, the HOW seems to be contained to 'undertaking social and economic assessments' when venues want more EGMs and ensuring that planning conditions are met. The other aspects of your public health approach are listed — advocacy, collaborations, capacity building — but what type of advocacy will you implement, who will you collaborate and in what form, and how do you propose to build the community's capacity to understand risks and harms?

In summary, we think the policy would better meet the needs of the community if the culture and history of the area was acknowledged, if the issues the policy is tackling are spelled out, if the effects of Albury's culture upon Wodonga's community are detailed and how the policy's effectiveness will be measured.

KEITH GREGORY

Well written and outlines the council's well being and equitable approach. Could be a bit specific about particular vulnerable groups such as young people.

ALLIANCE FOR GAMBLING REFORM
CAROL BENNETT, CEO

Thank you for the opportunity to provide a submission on the City of Wodonga's gambling harm reduction policy.

The Alliance for Gambling Reform is a national peak body which represents a collaboration of organisations with a shared concern about the harmful aspects of gambling and its normalisation in Australian culture. We are a registered health promotion charity. The Alliance supports public policy and regulatory regimes that make Australia a safer, healthier, and more equitable society by reducing the level of gambling harm.

We work closely with our Leadership Councils to support local measures that reduce and prevent gambling harm such as gambling harm prevention policies and advocate for gambling reforms on a state and national level.

Local government policies that have a clear commitment to prevent and reduce gambling harm in their communities are an important lever for councils and the Alliance understands that the Rural City of Wodonga has been faced with large increased losses from poker machines post the pandemic. We are keen to support you with the implementation of a robust policy to offset these losses and consequent harms in the Wodonga community.

The Alliance acknowledges and supports Wodonga Council's recognition of gambling as a public health issue. We also support Wodonga Council's commitment to undertake social and economic impact assessment to understand the impacts of planning or licence application for additional poker machines or a new venue application.

In relation to you council's commitment to protecting communities from gambling related harm and taking a public health approach, we offer the following comments for consideration.

As gambling is a harmful product, it would be helpful to recognise the following language in the policies purpose as outlined in the Alliance's language guide:

- 'Maximise opportunities for both gambling and non-gambling activities to bring overall benefits to the community'. This could be perceived as supporting an increase in gambling or a support of gambling activities in Wodonga which would be at odds with a public health response. We would suggest 'Maximise opportunities for non-gambling activities to increase the health and wellbeing of the Wodonga community.'
- 'Considering the potential social and economic advantages associated with both types of activities (gambling and non-gambling)'. In recognition of the harms that gambling can and does cause in the Wodonga area. The Alliance would recommend deleting this part of the sentence.
- The Alliance also urges Wodonga Council to consider strengthening the policy name to 'Gambling Harm Prevention Policy' to reflect a proactive approach to reducing gambling harm.

The Alliance also supports Wodonga Council's commitment to prohibit EGMs within Council-owned facilities as well as prohibiting advertising that promotes gambling participation on Council-owned and/or managed facilities.

The Alliance urges Wodonga Council to include stronger wording on this commitment to ensure all gambling advertising (including logos or advertisements of facilities/ pubs/ club's businesses that operate gambling) is prohibited from being advertised on council owned and/ or managed facilities. The Alliance suggests Wodonga Council adopt wording similar to for example, Monash City Council's 'Public Health Approach to Gambling Harm Policy':

'Gambling activity or the promotion or advertising of any gambling activity or venue on Council-owned or managed land or in Council facilities is prohibited. This includes but is notlimited to advertising or promotion within clubrooms, via newsletters or email banners, on club attire or paraphernalia, or on sports ground fencing or scoreboards. This pertains to all forms of gambling advertising, particularly sports betting, online gambling and EGM venues. Failure by user groups or tenants to comply with this requirement will result in their use of the facility being jeopardised1.'

The Alliance also strongly supports Wodonga Council's commitment to expand the range of non-gambling activities through advocacy, collaboration and partnerships. Libraries After Dark has proven to be a worthwhile investment for councils as an alternative recreational activity for communities.

Finally, the Alliance urges Wodonga Council to include in your policy a commitment to provide professional development for council staff that develops an understanding of gambling harm and its impacts (for the social policy team, but also more widely including sport and recreation, positive ageing, youth and families). We also urge an inclusion in the policy that empowers officers to enforce the policy and explains what enforcement action will be taken.

Thank you for the opportunity to provide a submission and please don't hesitate to contact us if you have any questions or wish to discuss.

MICHAEL FUERY

Response to 1. Planning and regulation:

Firstly, cease using the word 'gaming'...it is *gambling* and use every opportunity to convey its harmful, addictive nature in all related communications by Council. Understand that gambling harm sometimes flies under the radar, masked by other problems of mental ill-health, such as anxiety disorder.

Electronic gambling in our city should be time-limited by regulation, ie not permitted after 11pm (due to the high risk of development of problem gambling) and machines need to be stripped of audio output, so that the design strategy for addiction (through partial reinforcement patterns) is not bolstered by sounds and music.

Gambling venue staff need to be empowered to approach patrons who are observed to spend large sums of money and time in their venue so that they can approach them and alert them to their unconscious behaviour. They should be free to offer the assistance of counselling services and able to remind patrons that self-exclusion options are available.

Response to 2. Advocacy:

In undertaking assessments and understanding effective initiatives Council should seek the expertise of specialists like A/Prof Charles Livingstone (Monash University) and Prof Samantha Thomas (Deakin University), both with impressive backgrounds in public policy and harm-minimisation strategies.

Response to 3. Collaboration and partnerships:

Council needs to have realtime contact with those support agencies to be aware of the behaviour of agile clubs and hotels in the area that provide gambling services to the vulnerable. This would include services like St Stephen's Uniting Care and Gateway Health and psychologists and counsellors trying to support problem gamblers. Getting timely feedback from these agencies would provide good guidance for policy enforcement.

Response to 4. Capacity building:

Seek to replace gambling venues with electronic simulation experiences that incorporate *actual* games (requiring skill and analytical thinking), such as flight simulators, driving and other virtual reality activities, designed for people of all ages and abilities and demonstrated to be non-harmful. Businesses or 'arcades' that offer these experiences should be encouraged into our city to provide additional stand-alone evening activities or something to pursue after dining out.

As an addendum to my previous submission (the above), I would like to point out that the 'Purpose' in the current policy is fundamentally flawed. I refer to these statements:

"Establish a robust, evidence-based, and consistent approach to planning and regulatory processes that effectively manage the location and operation of *new and additional* Electronic Gaming Machines (EGMs).

"Maximise opportunities for both *gambling* and non-gambling *activities to bring

overall benefits to the Wodonga community.* This includes facilitating a diverse range of activities that cater to the interests and preferences of community members, while also considering the potential social and economic advantages associated with both types of activities."

These aims (asterisks applied) are mutually exclusive of providing a benefit to the Wodonga community.

Gambling--NOT 'gaming'--needs to be viewed on a continuum of harm. The questions that need to be answered are which are low harm and which are high harm. Even those considered "low harm"...such as purchasing lotto tickets, can leave an addicted pensioner without money for groceries for a fortnight. I witnessed such a conversation at a local agency where an elderly woman stated this consequence. The sales person then went on to try to sell them another system ticket for more chances to win.

EGMs are high harm and are designed to be as addictive as cocaine. See the documentary 'Ka Ching: Pokie Nation' http://kachingfilm.com/ In clear conscience we cannot allow their numbers to be expanded if we actually care about the community wellbeing. EGMs need to be removed from society, if anything.

Make no mistake...gambling is an activity for losing money. "The house always wins" is a simple but an accurate fact. This loss of money means that there will be less for vulnerable consumers to spend their money on tangible goods and services locally.

People are wasting money on a pipe dream, for the most part. Our television networks always highlight the 'winner of $6 million' but never talk about those who have lost substantial amounts of money which adversely affect their lives or families.

And why would they disclose the complete picture of proportionate wins and losses to the public when corporate profits take precedence over individual harms? The corporate narrative needs to sell a fantasy without logic or analysis being invoked.

In short, there should be no expansion of gambling in our city; it needs to be pushed into the dark recesses of parasitic businesses that have no scruples, and regarded as a shameful activity that exploits the vulnerable.

There are plenty of fun, healthy and productive activities to be explored and encouraged for the future benefit of our community.

ANONYMOUS

I am a proud resident of Wodonga, having grown up here. I moved away for 13 years and once I started a family I chose to return to Wodonga with my husband and children for the wonderful opportunities, location and community available to Wodonga residents.

I am objecting to both the draft policies for alcohol and gambling which are up at the moment for public comment.

Gambling policy

1. Articulate council's public health approach to gambling.
2. Establish a robust, evidence-based, and consistent approach to planning and regulatory processes that effectively manage the location and operation of new and additional Electronic Gaming Machines (EGMs).
3. Maximise opportunities for both gambling and non-gambling activities to bring overall benefits to the Wodonga community. This includes facilitating a diverse range of activities that cater to the interests and preferences of community members, while also considering the potential social and economic advantages associated with both types of activities.

While I have not had time to draw on Council documents, statistics of gambling, and the number of gambling devices and events held in Wodonga encouraging gambling, I can speak to my first hand experience of being a child in a family severely affected by gambling. My father was addicted to both gambling and alcohol consumption, causing extreme financial distress and hardship on our family growing up. My mother, had to take a second mortgage on our humble little East Wodonga home to pay off debts accrued by his constant gambling.

There were minimal supports on offer, by Community Health or the local Community for Gambling. Minimal education on money management.

My father gambled every spare cent until his death in 2020.

Point 1 - Articulate council's public health approach to gambling.

Please consider an active, public program for gamblers help. Could Wodonga Council be the first council to actively and publicly show their concern for the longer effects of gambling on a community?

An example, including education for younger children to teens, for example; many 'free' game apps young people play include 'spin the wheel' or 'match the poker machine slots' to 'win' to get bonuses to continue on in the game. This desensitization will likely increase the tendency to gambling on adult years.

Point 2 - Establish a robust, evidence-based, and consistent approach to planning and regulatory processes that effectively manage the location and operation of new and additional Electronic Gaming Machines (EGMs)

Please can Wodonga Council put a limit on EGM machines available? And while our population is growing, please consider the families who are losing incredible percentages of their household income each week to EGM's.

I object strongly to the 3rd point mentioned - Maximise opportunities for both gambling and non-gambling activities to bring overall benefits to the Wodonga community. This includes facilitating a diverse range of activities that cater to the interests and preferences of community members, while also considering the potential social and economic advantages associated with both types of activities.

'Maximize opportunities for both gambling and non gambling activities..' why should Council be trying to maximize gambling events to our community? I am appalled that this wording 'MAXIMISE' is in a draft policy and ask for you to consider the potential social and economic disadvantages associated with gambling activities! My father going to The races meant that we had so much less that week, as he always lost a significant amount of money.

Council need to Maximise the safety and security of the Future children, teens, young adults and adults lives by limiting the number of gambling opportunities in our area.

I feel your response to my objection could simply be, that not everyone who attends the venues with EGM's or attends the races is an addict like my father was, which is true, however I say to you that he was not always an addict either. When our family moved to Wodonga in 1974, my mother never expected she would need to pay off her little house twice.

For the sake of Wodonga's future please reconsider this draft policy.



Draft Alcohol and Gambling Policies

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FEEDBACK - DRAFT ALCOHOL POLICY

MICHAEL FUERY

Response to 1. Planning and Regulation:

A local exemplar would be the transformation of the Carriers Arms to the Church Street Bistro, from one of Wodonga's roughest and most alcohol-soaked troughs to a family-friendly, socially responsible and safe space.

Wodonga needs more venues that can serve alcohol responsibly and fewer liquor outlets that provide people with a carte blanch to purchase cheaply and drink in an anti-social or non-social setting.

Response to 2. Advocacy:

This may mean being prepared to revoke permits for those businesses directly implicated in alcohol-related harm, where profit from sales is given higher priority than duty of care. An example would be the elderly woman, living alone in the city's east, who was an alcoholic. She would frequent a Beechworth Road liquor outlet on foot and build her stash of alcohol for the week. She drank continuously and would be so incapacitated that she or neighbours would call an ambulance at least three times a week, sometimes attending the ED and sometimes being left in the care of others. Her family contacted the liquor outlet, telling her that she was an at-risk alcoholic and insisted that they not serve her. She then changed tack and ordered alcohol by phone from BWS at Woolworths. The family tried to intervene again without success. Her illness was so protracted and pernicious that eventually she died, but the big business with a published corporate responsibility policy couldn't or wouldn't step in to halt her access to its harmful products.

Response to 3. Collaboration and partnerships:

Stakeholders need to be added in order of consequence: Victoria Police, Ambulance Victoria, Albury Wodonga Health, Drug & Alcohol Services, Adult Mental Health, Community Support Agencies such as Gateway Health and Junction Support, Department of Justice. These are the agencies that have to deal with inadequate policies and direct and indirect personal harms.

Response to 4. Capacity building:

It is important for Council to recognise that there are Community members who do not care about alcohol-related harm and who indeed will predictably bleat from the rooftops that any local government intervention constitutes 'nanny state' or 'overreach' or 'encroaching on personal freedoms' while they themselves will drink to excess and be part of the problem. It should anticipate this reaction and devise communication to diffuse it involving all stakeholders mentioned above. I suggest reinforcing any approach on a personal financial basis—"that because of the harms, we all pay for the cost of these agencies' interventions, while witnessing the irresponsible decisions of a few having dire consequences for individuals in their immediate vicinity, with flow on harmful effects to the Community."

KEITH GREGORY

The policy outlines the broader responsibilities of council well and clearly advocates an evidence based approach to prevention, recognising the need to develop the understanding of alcohol harms in the community. Although it is a framework document, it could be a little more specific about the areas that council can influence, e.g. sporting clubs and public consumption. Not thinking about specific actions here but more a recognition of what areas of council are involved. Also a specific recognition about the greater harm from alcohol that young people may experience.

ANONYMOUS

I have submitted an objection for the gambling draft policy, and this is my objection to the Draft alcohol policy.

I am the child of an alcoholic (deceased) who spent a great deal of his time in many of Wodonga's licensed establishments. His alcoholism was a constant battle for me, and our family and caused a great many problems for many.

The policy aims to achieve the following objectives:

1. Articulate council's public health approach to prevent alcohol-related harm.
2. Establish a robust, evidence-based, and consistent approach to planning and regulatory decisions related to the sale and consumption of alcohol in Wodonga.
3. Secure the real and perceived safety and amenity of places and spaces within the municipality where alcohol is purchased and consumed.
4. Optimise the potential of licensed premises to contribute to the establishment of a vibrant night-time economy, with the aim of fostering economic growth, supporting businesses, whilst mitigating anti-social behaviour, and ensuring the safety and well-being of individuals.

Point 1

Please invest in our young people! Consider educating young people and their parents about alcohol and the harm it can cause. Educate parents about the harm of allowing no-alcohol beer (& other drinks now available in supermarkets) now and the normalization this causes, and the early patterns and rewiring of a young persons brain when they drink from a Young age.

Point 2

Please can Council put a limit on the number of Licensed liquor stores? Wodonga is known to have a high ratio of liquor stores and the recent public objection to Junction place having a discount liquor store shows Council Wodonga's care and concern for their people. Please listen to the residents!

Point 4 - Optimise the potential of licensed premises to contribute to the establishment of a vibrant night-time economy, with the aim of fostering economic growth, supporting businesses, whilst mitigating anti-social behaviour, and ensuring the safety and well-being of individuals

Why is council concerned about optimizing the potential of licensed premises? I agree our businesses need a vibrant night time economy, however the focus of council should not be on licensed premises to build our vibrancy.

Please can the focus always be on the safety and well being of individuals, before anything else.

FEEDBACK - DRAFT ALCOHOL AND GAMBLING POLICIES

GATEWAY HEALTH

Submission to City of Wodonga – re draft Alcohol Policy and draft Gambling Policy

Summary

Meaningful, specific and proactive Alcohol and Gambling harm prevention policies are crucial to the health and wellbeing of both individuals and the community.

Councils can influence the conditions needed for good health, such as the natural, built and social environments in which people live, learn, work and play[1].They have a major role in supporting the objectives of the Victorian Public Health and Wellbeing Act 2008[2] by protecting, improving and promoting public health.

This response to the draft Alcohol Policy and the draft Gambling Policy is informed by feedback from the following teams at Gateway Health: Alcohol and Other Drugs, Headspace, Gamblers Help and Health Promotion. This response is also supported by reference to policy documents from other Victorian Local Government areas, which are all governed by the same state legislation. As well, this response is backed up by evidence from a range of research from peak bodies, as well as direct consultation with Victorian Health Promotion Foundation, Victorian Local Governance Association (VLGA), Municipal Association of Victoria (MAV), Alliance for Gambling Reform, Foundation for Alcohol Research and Education (FARE) and the Victorian Responsible Gambling Foundation (VRGF).

Gateway Health acknowledges that the harm inflicted on individuals and communities by gambling and alcohol needs to be tackled at all levels of government. Local government however has a crucial role in providing strong advocacy for measures to reduce harm in both these areas. It is heartening to see Victorian councils such as Hume City Council, utilising all the levers available to local government, which include taking on a strong advocacy role that has clearly influenced relevant state government legislation[3].

In the Wodonga Council Plan 2021-2025, one of Wodonga's top five health and wellbeing priorities areas is preventing all forms of violence. The Council Plan also highlights that out of the 79 local government areas, Wodonga is ranked 13th in Victoria for incidence of family violence[4]. Research strongly supports the fact that both gambling and alcohol can have a significant impact on the incidence of violence[5]. Often, but not always, gambling harm co-relates with or causes poor mental health, family violence and substance harm[6]. It can also happen in isolation.

In order for stakeholders and members of the community to fully understand the importance of these policies and the data that underpins them, both draft policies could be strengthened by including succinct background sections highlighting relevant local and state statistics and trends, as well as community consultation findings, both from Wodonga Councils recent Liquor and Gambling

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[1] VicHealth, Reducing harm from alcohol - Local government action guide https://www.vichealth.vic.gov.au/sites/default/files/Alcohol-LGA-Action-Guide.pdf

[2] Victorian Government, Public Health and Wellbeing Act 2008 https://content.legislation.vic.gov.au/sites/default/files/2023-08/08-46aa062-authorised.pdf

[3] Hume City Council https://www.hume.vic.gov.au/Residents/Latest-News/News-and-Media-Releases/2023/Hume-City-Council-drives-change-in-reducing-gambling-harm

[4] Wodonga Council Plan 2021/2025 https://www.wodonga.vic.gov.au/About-Council/Our-Organisation/Corporate-documents/Council-Plan-and-budget

[5] Australia's National Research Organisation for Women's Safety Limited https://pubmed.ncbi.nlm.nih.gov/25117847/ and https://www.anrows.org.au/project/the-relationship-between-gambling-and-domestic-violence-against-women/

[6] Royal Commission into Mental Health http://rcvmhs.archive.royalcommission.vic.gov.au

Harm Minimisation consultation findings[7], and from other key local stakeholders in this space. According to the Victorian Local Governance Association (VLGA), best practice gambling harm policies must include current data, evidence, research and practice[8].

Both draft policies state that they prioritise community health and wellbeing and that harm reduction is their primary aim. However, there are no clear goals around what these primary aims could look like. Gateway Health, which has expertise and experience in harm reduction related to both gambling and alcohol, would be happy to work in partnership with Wodonga Council and other local stakeholders to define harm reduction goals as part of the action plans to implement these policies.

There is much overlap in the harm minimisation approaches between alcohol and gambling. It is interesting to note that the names of many other Victorian council policies (detailed below), explicitly match the overall aim of harm minimisation, such as 'Gambling Harm Minimisation Policy', rather than just a generic 'Gambling Policy' as put forward by Wodonga Council. Both draft policies currently proposed by Wodonga Council state that the primary aim of the policies is to address harm from alcohol and gambling, and for clarity and direction - this aim needs to be reflected in the policy title.

Both policies look to be focused externally. In line with the draft documents referring to streamlining and unifying policies and processes, it would be useful to reference internally focused work as well. Other best practice policies outlined below reference internally focused role modelling strategies councils are committed to and acting on, including not accepting sponsorship from, and not awarding community grants to businesses or clubs who accept funding from the gambling industry. Also, positive role modelling can include actions such as not holding council meetings and events at venues with Electronic Gaming Machines (EGMs), and no rate payer funding going towards providing alcohol at council meetings.

RESPONSE TO DRAFT GAMBLING POLICY

One of the draft Gambling Policy key objectives is to *maximise opportunities for gambling*. This objective is in direct conflict with the overall purpose of this policy which is to *fulfil the council's statutory responsibility of upholding community health and wellbeing by addressing gambling related harm.*

Gambling related harm can have a range of extremely detrimental effects on both individuals and the community generally[9]. These include financial harm, negative impacts on physical and mental health, serious relationship problems including family violence, reduced performance at work and study, negative cultural impacts and a potential increase in crime[10]. It is important to emphasise that Electronic Gaming Machines (EGMs), otherwise known as pokies, have the most impact in terms of

[7] Wodonga Council https://makewodongayours.com.au/liquor-and-gambling-harm-minimisation
[8] Victorian Local Governance Association www.vlga.org.au/sites/default/files/VLGA03-Local-Govt-Policy-for-distribution15816.pdf
[9] Victorian Responsible Gambling Foundation https://responsiblegambling.vic.gov.au/resources/publications/discussion-paper-gambling-harm-and-the-online-gambling-environment-1145
[10] Victorian Responsible Gambling Foundation https://responsiblegambling.vic.gov.au/resources/gambling-victoria/gambling-harm-victoria/types-harm-gambling/

inflicting gambling related harm[11]. Also, most significant, it is the area that local government authorities can have the most influence[12] and as seen in the City of Monash policy, there are a number of ways in which councils can influence harm from gambling, including through planning and regulation, advocacy and leadership, funding and resourcing, and communication. The City of Monash policy passed in November 2023 has been considered the most progressive policy to date, showing leadership in how councils can adopt a public health approach to gambling using all possible levers at their disposal. Gateway Health recommends that Wodonga Council review the Monash policy and consider adopting the language and actions found there to strengthen the Wodonga policy.

Gambling harm arises from a complex interplay of factors, at numerous levels. There are multiple factors at work in the development of gambling harms at the population level, including individual psychological and behavioural factors such as stressful living circumstances, socioeconomic conditions, environmental factors such as the relative availability and proximity of gambling opportunities, technological factors including the nature and relative intensity of gambling technologies available, educational opportunities, employment opportunities, the availability of alternative recreational and entertainment opportunities, and the regulatory environment. Approaches to gambling harm prevention and reduction need to be cognisant of this complexity, and address factors such as these via effective multi-factorial interventions[13].

Planning and regulation

In the 'Scope' section of the policy, the key role Wodonga Council has in reducing harm from gambling needs to be more explicit. An example of this can be seen in an excerpt from the City of Ballarat Gambling Harm Policy:

> *Clause 52.28 of the Victorian Planning Provisions under the Planning and Environment Act 1987 provides a statutory responsibility for councils to consider the social and economic impacts of gaming machines in their municipality. The Gambling Regulation Act 2003 enables local government to make submissions to the Victorian Gambling and Casino Control Commission (VGCCC) in the form of a social and economic impact assessment (SEIA) for potential new applications for EGMs within its municipality or a neighbouring municipality[14].*

In the 'Planning and Regulation' section, the draft policy suggests *the rate of electronic gaming machines (EGMs) per 1000 adults in the region would not exceed the Victorian rate.* This does not take into account the high number of EGMs in Albury. As key strategic documents such as *Two Cites*

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[11] Victorian Responsible Gambling Foundation https://responsiblegambling.vic.gov.au/resources/publications/victorian-population-gambling-and-health-study-20182019-759/ and https://responsiblegambling.vic.gov.au/documents/763/VRGF_Population_Study_2018-2019_Fact_Sheet_4_4SmgROB.pdf

[12] City of Monash Public Health Approach to Gambling Policy https://www.monash.vic.gov.au/About-Us/Corporate-Strategies-Plans/Plans-and-Strategies/Public-Health-Approach-to-Gambling

[13] Victorian Responsible Gambling Foundation, Gambling Harms Scales https://responsiblegambling.vic.gov.au/documents/1206/RES0118_The_Gambling_Harms_Scales.pdf

[14] City of Ballarat Gambling Harm Minimisation Policy www.ballarat.vic.gov.au/sites/default/files/2022-04/Gambling%20Harm%20Minimisation%20Policy%202022%20Final.pdf

One Community outline, Wodonga cannot be looked at in isolation. Albury Wodonga combined have access to more EGMs per capita than Geelong, Bendigo or Ballarat [15].

In the same section, the draft policy states that when considering new applications for EGMs, *the venue is not located neighbouring or nearby an education facility or premise where the principal activities focus on persons under the age of 18 years*. There needs to be clarity about how *neighbouring or nearby,* is defined. There are links between proximity to gambling venues and gambling involvement and harms. Evidence indicates that proximity matters: doubling the distance from one's residence to an EGM gambling venue reduces the likelihood of gambling on games offered in such venues. Residential proximity to gambling venues significantly increases financial hardship and mental health difficulties, especially for residents within very close distances[16]

A further planning consideration relates to the placement of smoking areas and toilet facilities inside EGMs venues. Patrons should not be required to pass through EGMs areas to access these facilities.

Gateway Health strongly recommends that when Wodonga Council is considering any proposal for additional or new EGMs, a comprehensive, independent, Social and Community Impact Assessment must accompany any such applications. This requirement should also be incorporated into the Planning Scheme.

The Victorian Gambling and Casino Control Commission (VGCCC) "no net detriment" test, establishes clear requirements for assessing EGM applications, and this test should be integrated into Council's Gambling Policy 17. The VGCCC Harm Minimisation Statement notes that "*The harm experienced by one person is not lessened by any associated benefits accruing to other people*[18]."

Councils can have a critical role in creating and promoting safe, inexpensive alternatives to gambling[19], such as the activities conducted at the municipal libraries under the 'Libraries after Dark' program[20], which a number of other Victorian councils offer. These alternative activities to gambling need to be tailored to each at risk population. Further, members of these populations need to participate in the co-design to ensure their needs are met and these activities are utilised and effective. This recommendation also aligns with priorities and indicators in the Wodonga Council Plan 2021-2025, under *Connected and Engaged Community – increased opportunity for vulnerable population groups to engage and participate*[21].

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[15] Victoria Responsible Gambling Foundation, comparison data https://responsiblegambling.vic.gov.au/resources/gambling-victoria/pokies-across-victoria/#numbers-of-pokies

[16] Victorian Responsible Gambling Foundation https://responsiblegambling.vic.gov.au/documents/969/VRGF_RR-JUNE2021_Proximity_to_gambling_venues_gambling_behaviours_and_related__avlwmAe.pdf

[17] Victorian Gambling and Casino Control Commission www.vgccc.vic.gov.au/sites/default/files/key_factors_in_deciding_egm_applications_-_2019_0_0.pdf

[18] Victorian Gambling and Casino Control Commission https://www.vgccc.vic.gov.au/our-position-harm-minimisation#:~:text=Harm%20is%20preventable.,of%20harm%20or%20possible%20harm

[19] Victorian Responsible Gambling Foundation https://responsiblegambling.vic.gov.au/documents/1057/Prevention_Partnership_Program_summary_evaluation_report.pdf

[20] https://www.librariesafterdark.com.au/overview and https://www.vlga.org.au/governance-leadership/gambling/libraries-after-dark

[21] Wodonga Council Plan 2021/2025 https://www.wodonga.vic.gov.au/About-Council/Our-Organisation/Corporate-documents/Council-Plan-and-budget

Legislation

In the 'Related Legislation' section of the draft policy, it is encouraging to see Council acknowledge its planning role in this issue and outline relevant sections in the Local Government Act 2020, sections 8 & 9. Councils have a statutory responsibility to respond to the planning permit applications for poker machine venues and have a role in responding to licensing applications decided by the VGCCC. This statutory responsibility needs to be made explicit in this policy.

Even though the draft policy does cite the Charter of Human Rights and Responsibilities Act 2006, it needs to go further by making clear the connection between this draft policy and relevant sections of the Charter.

> *Council, Councillors and members of Council staff are a public authority under the Charter of Human Rights and Responsibilities Act 2006 and, as such, are all responsible to act in accordance with the Victorian Charter of Human Rights and Responsibilities 2006 (the Charter).*

In particular, *Section 17 of the Charter – Right to the protection of families and children - whose welfare can be compromised by the destructive impacts of gambling in our community*, is directly relevant to the draft Gambling Policy.

The draft policy does not mention The Gender Equality Act 2020. Wodonga Council is mandated to take into account this Act in developing all its policies. Part 3, Section 9 of The Gender Equality Act 2020 states that:

> *'A defined entity must undertake a gender impact assessment when developing or reviewing any policy of, or program or service provided by, the entity that has a direct and significant impact on the public.'*

The impact of gambling in our community does exhibit a gendered impact, as outlined in Wodonga Council's Gambling and EGMs fact sheet[22]. Recent Australian studies have found that up to half of people with gambling problems and their family members report some form of family violence (largely affecting women and children) in the previous 12 months[23].

Opening hours

The draft policy does not highlight Council's role in influencing opening hours of venues with EGMs. Restriction of operating hours is an established, best practice harm minimisation measure in gambling regulation[24].

Critical actions, such as reducing the operating hours of poker machines must be taken to reduce and prevent gambling harm for the overall health and wellbeing of individuals, families and

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[22] Wodonga Council https://makewodongayours.com.au/liquor-and-gambling-harm-minimisation
[23] Australian Institute on Family Studies https://aifs.gov.au/resources/policy-and-practice-papers/impact-gambling-problems-families
[24] Victorian Responsible Gambling Foundation https://responsiblegambling.vic.gov.au/documents/640/Livingstone-identifying-effective-policy-interventions-June-2019.pdf

communities[25]. In line with best practice public health recommendations, the opening hours of gambling rooms that contain EGMs should be restricted between midnight to 10am[26].

Young people are increasingly being impacted by the harmful effects of gambling[27]. Victorian schools have reported that they are increasingly tackling the impacts of gambling on students' (as young as 10), education and brain development[28].

headspace Wodonga and Gambler's Help Wodonga, both based at Gateway Health, strongly advocate for reduced opening hours of spaces with EGMs.

It is paramount to emphasise that there are huge negative impacts to the Wodonga community from EGMs. For the financial year 2022-2023, data shows that Wodonga lost $10,728,931.74 from EGMs[29].

On the 3rd October, the Minister for Casino, Gaming and Liquor Regulation Melissa Horne introduced, under the new Allan Labor Government, the Gambling Legislation Amendment Bill 2023 to Parliament.

This amendment will enforce mandatory closure periods for all gaming machine areas in venues except Crown Casino between 4am and 10am every day from mid-2024, reducing gambling harm by giving people the chance to break from the dangers of endless play. It is the first major step taken by the State Government to reform gambling outside of Crown Casino, but much more still needs to be done to bring in regulation that will significantly reduce gambling harm in Victoria.

Evidence based, public health approach

In the 'Purpose' section of the draft policy, the 3rd dot point states: *Maximise opportunities for both gambling and non-gambling activities to bring overall benefits to the Wodonga community. This includes facilitating a diverse range of activities that cater to the interests and preferences of community members, while also considering the potential social and economic advantages associated with both types of activities.*

This point implies that the policy gives equal weight to the advantages and disadvantages of EGMs and is completely at odds with the public health approach stated throughout the rest of the draft policy. Furthermore, statistics shows that gambling generates NO net economic benefit, as jobs generated by gambling are balanced by declines in expenditure and employment in other fields of industry. In addition, less than five cents for every dollar lost to gambling by residents is returned to the local community[30].

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[25] Australian Gambling Alliance, Opening Hours https://www.agr.org.au/_files/ugd/f3b93a_10049cd25ed24e53a146a94522294dca.pdf and https://responsiblegambling.vic.gov.au/documents/1030/VRGF_Reducing_gambling_harm_in_Vic_2022_FINAL_MARCHweb.pdf

[26] Victorian Responsible Gambling Foundation, https://responsiblegambling.vic.gov.au/documents/21/using-a-public-health-approach-in-the-prevention-of-gambling-related-harm.pdf

[27] Victorian Government https://new.parliament.vic.gov.au/news/health/youthgambling/

[28] Coroners Court Victoria & Monash University, Gambling-Related Suicide in Victoria, Australia: A Population-Based Cross-Sectional Study https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4442857

[29] Victorian Gambling and Casino Control https://apps.vgccc.vic.gov.au/CA256F800017E8D4/VCGLR/2C4FB00D26AF1EFFCA257B320078D3F5?OpenDocument

[30] City of Greater Dandenong https://www.greaterdandenong.vic.gov.au/gambling-social-statistics

Contrary to the statement in this draft policy that there are economic advantages for local communities attached to gambling, research from Monash University clearly demonstrates that this is not true.

- Benefits of gambling accrue to corporations, their shareholders, and governments (often without redress for affected communities).
- Gambling diverts expenditure from alternative uses
    - Local businesses experience significant disadvantage in competing with gambling subsidised food and drink
    - Significant consumption expenditure is diverted
    - Gambling, especially automated gambling, is not highly productive of employment, especially compared to other consumption expenditure [31].

VLGA makes a very pertinent point in relation to this draft policy's objective about *maximising opportunities for gambling... to bring overall benefits to the Wodonga community.* Policy should aim to decrease losses from gambling, not increase the "community benefit". The VLGA warns that:

> *'a focus on maximising "benefits" is counter to good public health practice. In some cases, councils that have sought to maximise benefits from poker machine operators have found their decision making compromised when it comes to dealing with applications*[32]*'.*

Further recommendations:

- There are a number of programs available with the specific intention of addressing gambling related harm. One example of these programs is the Victorian Responsible Gambling Foundation 'Love The Game' program[33]. This is a program which aims to disrupt the normalisation of sports gambling by reducing the exposure of young people to sports betting promotions. Wodonga Council could promote this program to clubs who use council owned and managed land, and organisations such as Gateway Health could assist with the implementation of the program. This program is already used by over 650 local sporting clubs and schools in Victoria.

- Extend support to the harm reduction and prevention initiatives of the Victorian Responsible Gambling Foundation. These include an increased focus on fostering participation and cultivating partnerships during Gambling Harm Awareness Week, Community Engagement program activities and the Knowing the Score school education program[34].

- The Municipal Association of Victoria (MAV) has joined with councils and many other organisations as a founding supporter of the Alliance for Gambling Reform[35]. Launched in October 2015, the Alliance seeks to campaign for reforms to the gambling industry to reduce

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[31] Monash University https://research.monash.edu/files/325507035/284038181_oa.pdf
[32] Victorian Local Governance Association www.vlga.org.au/sites/default/files/VLGA03-Local-Govt-Policy-for-distribution15816.pdf
[33] Love the Game https://lovethegame.vic.gov.au
[34] Knowing the Score https://responsiblegambling.vic.gov.au/documents/902/VRGF-BAOTG_PDS-KnowingTheScore.pdf
[35] Municipal Association of Victoria https://www.mav.asn.au/news-resources/campaigns/previous-campaigns/pokies

harm from poker machines, and to protect disadvantaged communities from the infiltration of increasing numbers of poker machines. It is strongly recommended that Wodonga Council join this Alliance to increase their capacity to address gambling related harm, the stated objective of this draft policy. Further, at a recent MAV meeting of the State Council, a motion calling on the Victorian Government to introduce regulatory gambling harms was carried. This included a change to tightening up loop holes around what is considered to be 'community benefit'.

- There is an upcoming webinar all Victorian councils have been invited to by the Alliance for Gambling Reform. The Victorian Gambling and Casino Control Commission will discuss regulation in Victoria and how councils can engage with the regulator to reduce non-compliance and harm reduction in their communities. Gateway Health recommends Wodonga Council attends this free webinar.

Below are examples of more detailed Victorian council gambling policies that address evidence-based public health approaches:

- Nillumbik Shire Council, *Gambling Harm Minimisation Policy*[36]
- Wellington Shire Council, *Electronic Gaming Machine Policy*[37]
- City of Melton, *Gambling Harm Prevention and Reduction Policy*[38]
- City of Monash, *Public Health Approach to Gambling Harm Policy*[39]
- Wyndham City Council, *Gambling Harm Minimisation Policy*[40]
- Greater Dandenong, *Gambling Policy*[41]
- City of Ballarat, *Gambling Harm Minimisation Policy*[42]

RESPONSE TO DRAFT ALCOHOL POLICY

Alcohol causes significant harm to Australians, with one person dying every 90 minutes and one person being hospitalised every three minutes because of alcohol[43]. Alcohol-induced deaths are at their highest rate in Australia in a decade[44]. The latest *Harms to Others* study shows alcoholic products also cause harm to the broader community, with 10 million Australians harmed annually[45].

Alcohol causes harm to many people in Victoria, contributing to chronic disease, family violence, injury, self-harm and suicide. Over 1,300 people in Victoria die each year of alcohol-attributable disease and injury, and more than 30,000 hospitalisations in Victoria are attributable to alcohol[46].

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[36] Nillumbik Shire Council https://www.nillumbik.vic.gov.au/Council/Our-organisation/Strategies-policies-and-plans/Health-and-wellbeing
[37] Wellington Shire Council https://www.wellington.vic.gov.au/policies/electronic-gaming-machine-policy
[38] City of Melton https://www.melton.vic.gov.au/Council/Publications/Documents-Reports-Strategies
[39] City of Monash https://www.monash.vic.gov.au/About-Us/Corporate-Strategies-Plans/Plans-and-Strategies/Public-Health-Approach-to-Gambling
[40] Wyndham City Council www.wyndham.vic.gov.au/sites/default/files/2018-06/Gambling%20Strategy_Final.pdf
[41] Greater Dandenong https://www.greaterdandenong.vic.gov.au/gambling-policy
[42] City of Ballarat https://www.ballarat.vic.gov.au/city/my-community/gambling-harm
[43] National Drug Research Institute https://ndri.curtin.edu.au/news-events/ndri-news/media-release-alcohol-causes-nearly-6000
[44] Foundation for Alcohol Research and Education https://fare.org.au/fares-response-to-report-showing-alcohol-induced-deaths-at-their-highest-rate-in-10-years/
[45] Centre for Alcohol Policy Research La Trobe University https://onlinelibrary.wiley.com/doi/abs/10.1111/add.16205
[46] National Drug Research Institute https://www.alcoholharmtool.info/index.php

One in 4 people in Victoria consumed 5 or more alcoholic drinks in one sitting (at least monthly), and almost a fifth (23%) of people in Victoria exceed single occasion alcohol risk guidelines[47].

Wodonga rates moderate to high in terms of relative socio-economic disadvantage[48]. The Wodonga Council Plan also highlights that 53% of people in Wodonga are at risk of alcohol related harm, compared to 42.5% in Vic[49].

A data analysis request compiled by the Ovens Murray Public Health Unit, based at Albury Wodonga Health, found the following local data from 2021-2022[50]:

- The highest burden of alcohol consumption in Wodonga were ambulance attendances, hospital admissions, and family violence incidents, respectively,
- Hospital admissions for alcohol-related events accounted for 76% of admissions,
- The rates of alcohol related family violence incidents reported by Wodonga residents are higher than the Victorian average. The rate per 100,000 population is 171.4 in Wodonga, compared to 136.9 in Victoria.

Although major alcohol control policies are typically the responsibility of the Victorian Government, councils still play a significant role in reducing residents' risk of harm from alcohol by:

- developing strategic plans and policies that explicitly aim to reduce alcohol-related harm
- designing environments that reduce alcohol-related harm
- implementing strategic approaches that change alcohol cultures by changing social norms, attitudes and beliefs about alcohol use and intoxication
- building local partnerships that reduce alcohol-related harm

Community consultation

A key part of Council's role in preventing alcohol harm in the community is facilitating and representing the voice of the community. This means adopting a community-centric approach to liquor licensing and planning, that enables the voice, expectations, needs and aspirations of the community.

The development of both the draft Gambling Policy and Alcohol Policy involved an engagement process, where feedback was gathered from a range of stakeholders and community members. This showed a large majority (86%) of respondents have experienced or know someone who has experienced, alcohol harms, and a significant majority (71%) strongly disagree there should be more bottle shops in Wodonga[51].

There are a number of significant concerns about the draft Policy. This Policy states that one of its key objectives is to *prevent alcohol-related harm... using a public health approach*. This objective is compromised or contradicted by other statements and language used in the Policy:

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[47] Australian Institute Health and Welfare https://www.aihw.gov.au/about-our-data/our-data-collections/national-drug-strategy-household-survey/2019-ndshs

[48] SEIFA by Local Government data https://profile.id.com.au/wodonga/seifa-disadvantage

[49] Wodonga Council Plan 2021/2025 https://www.wodonga.vic.gov.au/About-Council/Our-Organisation/Corporate-documents/Council-Plan-and-budget

[50] Torrens University Australia, Social Health Atlas of Australia: Local Government Areas https://phidu.torrens.edu.au/social-health-atlases/data and Turning Point, Victorian alcohol and drug statistics https://aodstats.org.au/

[51] Wodonga Council Engagement Snapshot - Liquor and Gambling Harm Minimisation https://makewodongayours.com.au/liquor-and-gambling-harm-minimisation

- Prioritising, representing and advocating for the health and wellbeing of the community is not consistent with "*balancing*" economic considerations which support the "*growth of businesses*", whose sustainability relies on increased availability of alcohol in the community. It is not possible to "*simultaneously*" prioritise these two competing objectives.
- A public health approach addressing the social determinants of health is the opposite of an individualistic approach, that uses industry language of "*responsible alcohol practice*" and stigmatises individuals and communities with the outdated language of 'abuse' and 'misuse'.

Language

The Policy uses "*misuse and abuse of alcohol*". These terms are individualistic, discriminatory and stigmatising language. This 'individual responsibility' lens[52], is a false industry narrative that alcohol companies use to isolate and blame people from whom they make their greatest profits[53]. This messaging contributes to the stigma and shame often associated with alcohol and other drug use, and this limits people in seeking help.

Taking an evidence-based public health approach to the prevention of alcohol harm includes the use of accurate, evidence-based, and non-stigmatising language. Examples include using 'higher-risk' (in excess of Guidelines), or 'lower-risk', (within Guidelines) use of alcohol, (rather than 'misuse', 'abuse' or 'responsible'). There are a number of helpful language guides that have been developed, including by the Network of Alcohol and Drug Agencies[54] and by Mindframe[55].

Evidence-based, public health approach

In order for this draft Policy to achieve its objective to *establish a robust, evidence-based, and consistent approach to planning and regulatory decisions related to the sale and consumption of alcohol in Wodonga,* the Policy should acknowledge and make use of a number of existing and well-established approaches found within both the National Alcohol Strategy [56] and the Victorian Alcohol Strategy[57]. For example:

- WHO SAFER initiative. The World Health Organisation (WHO), in collaboration with international partners, launched the SAFER initiative in 2018[58].Two of the five most cost-effective interventions to reduce alcohol related harm sit within councils' remit:
    - restrict alcohol availability
    - restrict alcohol advertising, sponsorship, and promotion (on council owned land)
- Wodonga Council has previously received funding from Vic Health under the *Local Government Alcohol Project,* which provides councils with tools and evidence to add value and support their efforts to reduce alcohol fuelled harm at the local level.

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[52] Foundation Alcohol Research and Education https://fare.org.au/the-individual-responsibility-myth/
[53] Foundation Alcohol Research Education https://fare.org.au/wp-content/uploads/Risky-business-The-alcohol-industrys-dependence-on-Australias-heaviest-drinkers.pdf
[54] Network Alcohol and Drug Agencies https://www.nada.org.au/wp-content/uploads/2021/01/language_matters_-_online_-_final.pdf
[55] Mindframe, Guidelines for communicating about alcohol and other drugs https://mindframemedia.imgix.net/assets/src/uploads/Mindframe_AOD_Guidelines.pdf
[56] Commonwealth Government, National Alcohol Strategy 2019–2028 https://www.health.gov.au/sites/default/files/documents/2020/11/national-alcohol-strategy-2019-2028.pdf
[57] VicHealth Alcohol Strategy 2019–2023 https://www.vichealth.vic.gov.au/resources/vichealth-strategies/vichealth-alcohol-strategy-2019-2023
[58] WHO, The SAFER Initiative - A world free from alcohol related harm https://www.who.int/initiatives/SAFER

Limiting supply density

A key evidence-based measure that limits alcohol related harm, is measuring and restricting the density of alcohol supply outlets[59]. This draft Policy states that '*cumulative impact*' will be assessed to inform decision-making. This line of action needs to go beyond measuring liquor outlet density, which is necessary but not sufficient.

When Wodonga Council is measuring alcohol supply density, it also needs to take into account the availability and accessibility of alcohol which has vastly increased due to the rapid expansion of online sales and delivery of alcohol, which has almost quadrupled in ten years to $2.0 billion[60].

The Wodonga municipality currently has 18 packaged liquor outlets, with 6 of these bottle shops being within a 500m radius. Also, within this 500m radius, are 28 liquor licenced operator/venues. If a further packaged liquor outlet is approved, it will constitute a saturation or 'cluster' of venues, as defined by the Victorian Planning Scheme[61]. This is at a time when the city is already saturated with 93 outlets[62].

Restricting the density of alcohol supply outlets is also supported by feedback from the Wodonga community. Feedback from the Wodonga Council Community Engagement Snapshot - Liquor and Gambling Harm Minimisation, states that 71% of respondents strongly disagree with there being any more bottle shops in Wodonga.

Further recommendations:

There are numerous resources available to support the development of more specific and detailed approaches to alcohol harm reduction. VicHealth and the Alcohol and Drug Foundation (ADF) have developed a number of guidelines and resources to support local government actions in this area:

1. '*Local government approaches to minimise alcohol-related harm*'[63]. This was a Vic Health workshop based on a peer-learning which explored local government approaches to addressing alcohol-related harms through planning and other processes. It highlighted the issues raised, current council approaches and future opportunities.
2. '*Increasing alcohol harm prevention at a local level – Adopting alcohol harm prevention actions to protect children and young people*'[64] a VicHealth Local Government Partnership tool.
3. '*Local Government guide and tools*'[65]. This guide was developed by the ADF and VicHealth to explore what Victorian local governments can do to prevent and minimise alcohol-related harm, creating safer and healthier communities in their local government areas (LGAs):

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[59]Royal Australian College of General Practitioners, Alcohol: prevention, policy and primary care responses https://www.racgp.org.au/afp/2014/june/alcohol

[60] Australia Specialized Industry report OD4087, Online Beer, Wine and Liquor Sales in Australia, Industry at a Glance https://www.ibisworld.com/au/industry/online-beer-wine-liquor-sales/4087/#IndustryStatisticsAndTrends

[61] Victoria Department Transport and Planning https://www.planning.vic.gov.au/guides-and-resources/guides/planning-practice-notes/licensed-premises-assessing-cumulative-impact

[62] Wodonga Council Engagement Snapshot - Liquor and Gambling Harm Minimisation https://makewodongayours.com.au/liquor-and-gambling-harm-minimisation

[63] VicHealth, local government approaches to minimise alcohol-related harm: learnings from a VicHealth workshop https://www.vichealth.vic.gov.au/sites/default/files/Minimising-alcohol-harm-VH-workshop-summary.pdf

[64] VicHealth, Increasing alcohol harm prevention at a local level https://www.vichealth.vic.gov.au/sites/default/files/2023-03/Alcohol%20Prevention_VLGP.pdf

[65] Australian Drug Foundation and VicHealth, Local Government guide and tools https://community.adf.org.au/run-activities/local-gov-guide/

- Art of Community Alcohol Management. What local government can do to prevent and minimise alcohol-related harm.
- LGA Guide Tool 1. Local Government Leases – Alcohol Availability, Sponsorships and Advertising
- LGA Guide Tool 2. Alcohol consumption at council-run events, functions and meetings
- LGA Guide Tool 3. Prevention Capacity and Infrastructure Survey
- LGA Guide Tool 4. Prevention Capacity and Infrastructure Self-assessment Tool
- LGA Guide Tool 5. Survey for community members
- LGA Guide Tool 6. Survey for local business
- LGA Guide Tool 7. High quality data sources
- LGA Guide Tool 8. Developing a community alcohol profile
- LGA Guide Tool 9. Local government alcohol-related data
- LGA Guide Tool 10. Mapping alcohol-related priorities in a community

Below are examples of more detailed Victorian council alcohol policies that address evidence-based public health approaches:

- Latrobe City Council, *Reducing Alcohol Related Harm Policy*[66]
- City of Greater Dandenong, *Alcohol Management Policy*[67]
- Hobson Bay, *Minimising the Harm of Alcohol Policy Statement*[68]
- Maribyrnong City, Council *Alcohol and Other Drugs Policy*[69]

[66] Latrobe City Council, Reducing Alcohol Related Harm Policy https://www.latrobe.vic.gov.au/Council/Our_Organisation/Corporate_Documents/Council_Policies/Reducing_Alcohol_Related_Harm_Policy

[67] City of Greater Dandenong, Alcohol Management Policy https://www.greaterdandenong.vic.gov.au/alcohol-management-policy

[68] Hobson Bay, Minimising the Harm of Alcohol Policy Statement https://www.hobsonsbay.vic.gov.au/Council/Strategy-Planning/Social-policy-planning/Minimising-the-Harm-of-Alcohol-Policy-Statement

[69] Maribyrnong City Council Alcohol and Other Drugs Policy https://www.maribyrnong.vic.gov.au/Residents/Staying-safe-and-healthy/Your-health-and-wellbeing/Alcohol-tobacco-and-other-drugs