

**Submission to the Public Accounts and  
Estimates Committee of Parliament  
Inquiry into the Victorian Auditor-  
General's reports no. 99: Follow up of  
Regulating Gambling and Liquor (2019)  
and no. 213: Reducing the Harm Caused  
by Gambling (2021)**

**July 2023**



Victorian  
Responsible  
Gambling  
Foundation



# Contents

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1.	Executive summary.....	1
2.	Introduction .....	3
	About the Foundation .....	3
	Evolution of our role.....	3
	A public health approach to gambling harm .....	4
3.	Strategic direction .....	5
	Strategic priorities and objectives.....	5
	Functional approach.....	6
	Enhancing our efficacy.....	8
	Working with community – case studies.....	10
4.	Response to VAGO recommendations.....	13
	Understanding gambling harm.....	13
	Preventing gambling harm .....	15
	Treating gambling harm .....	17
5.	Gambling harm and the online environment.....	20
	Foundation discussion paper.....	20
	You win some, you lose more.....	21
	Future focus.....	22
	Appendix A .....	23
	Victorian Responsible Gambling Foundation (VRGF) action plan to address recommendations from VAGO report, March 2021.....	23
	Appendix B .....	26
	Status of actions to address VAGO recommendations, July 2023.....	26
	Attachment	
	1: <i>Discussion paper: Gambling harm and the online gambling environment</i> , February 2023	
	Abbreviations and acronyms	
	<b>AOD</b> alcohol and other drugs	
	<b>DJCS</b> Department of Justice and Community Safety	
	<b>MARAM</b> (Family Violence) Multi-Agency Risk Assessment and Management (framework)	
	<b>VAGO</b> Victorian Auditor-General's Office	
	<b>VGCCC</b> Victorian Gambling and Casino Control Commission	

# 1. Executive summary

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The Victorian Responsible Gambling Foundation welcomes the opportunity to make a submission to the Public Accounts and Estimates Committee of Parliament Inquiry into the Victorian Auditor-General's Office (VAGO) report no. 213: *Reducing the Harm Caused by Gambling* (2021).

The Foundation is accountable for our important work and embraces opportunities to strengthen our performance and support others to do the same. Hence, we valued the opportunity to participate in the audit process, which identified and/or reaffirmed areas of our performance that would benefit from improvement.

The Foundation is a leader in understanding, and responding to, the complexities of gambling harm. As the evidence base has grown, our role has changed and evolved, moving from a 'problem gambling' treatment and support focus, to a public health approach centred on preventing and reducing gambling harm.

A public health approach recognises that gambling products are designed to keep people gambling, and the way industry promotes and offers them can increase the risk of harm. Treatment and support continue to form a significant component of our work, but our scope has necessarily broadened to place greater emphasis on awareness raising, education, prevention and early intervention.

The VAGO recommendations helped to distil the areas in which better integration would enable the Foundation to empirically determine the efficacy of our programs, make improvements and strengthen outcomes for all Victorians.

Recognising the need to better understand the broader impact of our work, the Foundation had already started down a path to a more holistic approach prior to the audit. To this end, development of an outcomes-based framework was well advanced when the audit was conducted.

The framework, which is now complete, has been designed to measure the progress of the full range of activities undertaken in Victoria to prevent and reduce gambling harm. The Foundation is using the framework to guide and inform our strategic approach and program development, and to evaluate our work. It can also be used to measure the contributions made by other parts of government, as well as the health, community and industry sectors.

A comprehensive, independent review of the Gambler's Help service system has been conducted by local consultancy firm Impact Co and recommendations for a new, stepped care service model are close to final. As part of this work, an enhanced fit-for-purpose set of client outcome measures is being identified and will inform the design of key performance indicators to determine whether services meet client needs.

We have acted on VAGO's feedback that the findings of our research, which have been highly effective in building knowledge about sources and dimensions of gambling harm, identifying at-risk groups and co-occurring health problems, should consistently be used to improve program design and service delivery.

In collaboration with La Trobe University, the Foundation has developed an innovative prevention programming framework that covers the spectrum of prevention activities. And we are in the process of ensuring the robustness of the cost-effectiveness principles we have built into a framework for evaluating gambling harm prevention programs. To our knowledge, the Foundation is the first and only organisation in the world to have taken on the challenge of doing this work and we anticipate there will be significant interest in it.

In the area of treatment, the Foundation's expertise is used to enhance the delivery of effective prevention and treatment programs, and to support people who are in recovery. Integral to this are insights gained from working with people who have lived experience of gambling harm. Our sector development strategy supports efforts to mobilise knowledge through, for example, communities of practice, professional development sessions and conferences.

The Foundation's strategic priorities, services and programs focus on at-risk groups and support individuals who are affected by harm in the interests of the health and wellbeing of the broader community. We are committed to ensuring that they fulfil their intended objectives.

Gambling is an inherently risky activity that leads to a range of harms for a substantial number of Victorians. The Foundation is ever mindful to ensure that we work in ways that are sensitive, appropriate and responsive to the needs of communities and that afford people dignity, respect, and self-determination.

The strategic direction, innovations in practice and application of knowledge by the Foundation in the two years since the VAGO report demonstrate an evidence-based, outcomes-focused public health approach to preventing and reducing gambling harm. This submission summarises the work we have done, and the work that is ongoing, to effectively meet the challenges presented by a dynamic gambling environment and achieve our purpose.

## 2. Introduction

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### About the Foundation

The Foundation is a statutory authority established under the *Victorian Responsible Gambling Foundation Act 2011*. We are currently funded until 30 June 2024.

The legislation identifies the Foundation's objectives as: 1) reducing the prevalence of problem gambling and the severity of harm related to gambling; and 2) fostering responsible gambling.

VAGO, in its 2021 report *Reducing the Harm Caused by Gambling*, stated the role of the Foundation is to reduce gambling harm.

In summary, the Foundation's legislated functions are to:

- undertake activities to address the causes of gambling harm
- deliver education and information programs to promote responsible gambling behaviour
- raise awareness of the risks of gambling
- support public understanding of, and participation in, gambling policy issues
- provide treatment, counselling services and intervention services for problem gambling
- advocate within government through the provision of evidence-based advice and information.

The Foundation is governed by an independent board that is accountable to the Minister for Casino, Gaming and Liquor Regulation. The board comprises at least four (but no more than eight) appointed members and three members of the Victorian Parliament, selected by joint sitting and representing different political parties. The chief executive officer of the Foundation is appointed by, and is accountable to, the board.

The Foundation's Lived Experience Advisory Committee was established in 2018 to advise the board and management on matters related to the planning and implementation of gambling harm-related services for Victorians, prevention strategies and research priorities.

The Foundation maintains close working relationships with our portfolio lead agency, the Department of Justice and Community Safety (DJCS), Victorian Gambling and Casino Control Commission (VGCCC), Office of the Special Manager for the Melbourne Casino Operator, other agencies of the Victorian Government, and our many funded partners across the gambling harm prevention sector.

### Evolution of our role

The Foundation has been on a journey of growth and change since we were established in 2012, when our core responsibility was to ensure that people experiencing a gambling issue could access effective treatment and support services. This role has continued, but our responsibilities have broadened to reflect a more sophisticated understanding of the sources and extent of gambling harm and ways to prevent and reduce it.

This more comprehensive approach has accelerated since the release of the 2021 VAGO report.

Our internationally recognised research program has built a substantial evidence base, which continues to expand and advance our understanding of the changing gambling environment and issues within it. Our research program and the actions informed by it have put the Foundation at the forefront of developing responses to both risks and occurrences of gambling harm.

'Gambling harm' is a concept that has attained international prominence in the past decade. It refers to the negative consequences caused or made worse by gambling, which are experienced not only by the person who gambles, but their networks and the broader community.<sup>1</sup> The impact of gambling harm is significant, with the social cost of gambling to the Victorian community conservatively estimated at \$7 billion a year.<sup>2</sup>

The 24/7 availability of, and easy access to, gambling opportunities that are strongly associated with harm, add credence to the argument that gambling harm must be addressed at a population level.<sup>3</sup> This holistic approach, in which treatment services are complemented and leveraged by prevention strategies, and both are supported by research, is the only way to deliver the significant reductions in morbidity and mortality that have been achieved for other harms, such as those related to alcohol.<sup>4</sup>

## A public health approach to gambling harm

The Foundation's public health approach to gambling harm recognises that:

- a combination of factors contribute to gambling harm, including social, cultural, policy, legislative, economic and environmental factors
- harm is experienced by individuals who gamble, their family members, friends, communities and the broader population
- gambling products are designed to keep people gambling, and the way industry promotes and offers them increases the risk of harm
- there is a collective responsibility for minimising harm that sits across governments, regulators, product developers, gambling providers, the advertising industry and those who partner with gambling companies, such as sporting bodies.

Accordingly, the scope of the Foundation's work is broad, encompassing evidence-based prevention, early intervention and treatment and support programs, policy advice, knowledge mobilisation and behaviour change campaigns.

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1 Gambling harm can be defined as *any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrement to the health or wellbeing of an individual, family unit, community or population*. From Langham, E., Thorne, H., Browne, M., Donaldson, P., Rose, J., & Rockloff, M. (2015). [Understanding gambling related harm: A proposed definition, conceptual framework, and taxonomy of harms](#). BMC public health, 16, 1–23

2 Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M 2017, [The social cost of gambling to Victoria](#), Victorian Responsible Gambling Foundation, Melbourne.

3 For sources discussing and supporting the efficacy of a public health approach to gambling harm see: Alex Price, Margo Hilbrecht, Rosa Billi (2020) Charting a path towards a public health approach for gambling harm prevention Journal of Public Health from theory to practice November; C. Livingstone, A. Rintoul, (2020) Moving on from responsible gambling: a new discourse is needed to prevent and minimise harm from gambling Public Health March; S. Marko et.al (2022) Gamblers' perceptions of responsibility for gambling harm: a critical qualitative inquiry BMC Public Health 12 April; Productivity Commission. (2010). Gambling, Report Number 50. Canberra. Vol.1 pp.17.18, Sec 5.30.

4 Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K (2020) [Victorian population gambling and health study 2018–2019](#), Victorian Responsible Gambling Foundation, Melbourne.

## 3. Strategic direction

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### Strategic priorities and objectives

The Foundation's strategic priorities guide our work and reflect the issues we address within the gambling environment, underpinned by our commitment to deliver outcomes that will have health and wellbeing benefits for all Victorians.

Our three-year strategic priorities and annual business plan are available on the [strategic directions page of the Foundation's website](#).

Legislation requires that the Foundation's annual business plan be developed in consultation with the Minister for Casino, Gaming and Liquor Regulation and endorsed by the board by 30 September each year.

We are accountable for our operational outputs, which are described in the Foundation's annual report, along with our achievements. Our annual reports are tabled in the Victorian Parliament and [published on our website](#).

In developing our strategic priorities 2021–24, the Foundation anticipated the outcomes and recommendations of VAGO's *Reducing the Harm Caused by Gambling* report. Our strategic priorities and objectives are:

1. **Foster community understanding of gambling harm** to lay the groundwork for the attitudinal changes required to prevent and reduce gambling harm.

Objectives:

- develop and promote guidance on how to reduce the risk of gambling harm
- expand the scope of work in which people with lived experience play a role to reduce the stigma associated with harm
- increase awareness of gambling harm and how it affects health and wellbeing, including links to mental health issues
- deliver targeted campaigns and digital strategies that build understanding of gambling harm and reduce harmful gambling behaviour.

2. **Inform and deliver prevention activities** to reduce the harm in populations, communities and settings most affected by access and exposure to gambling products.

Objectives:

- fund and support delivery partners that demonstrably address key risk and protective factors for gambling harm and in settings associated with harm
- inform policy development and regulatory processes, with a focus on preventing and reducing harm in at-risk communities
- deliver education and awareness-raising programs to address the precursors to gambling harm relevant to children and young people
- expand settings-based approaches to facilitate early intervention to reduce gambling harm.

3. **Strengthen the funded services system** to provide accessible, integrated, relevant and visible options for the delivery of effective treatment and support to people seeking help for gambling harm.

Objectives:

- enhance the service system based on user needs to anticipate changing help-seeking patterns and reflect best available evidence of recovery journeys
- integrate peer support (lived experience) throughout the service system
- establish screening and referral processes with other service systems to better support people with co-occurring issues
- promote the benefits of seeking help and the range of options tailored to personal preferences.

## Functional approach

The Foundation's programs and activities give effect to our strategic priorities and annual business plan. Actions generally fall into one of five overlapping functional categories.

1. **Building, expanding and strengthening knowledge and understanding of gambling harm**

The [Foundation's research program](#) identifies knowledge gaps and awards grants to researchers whose projects will expand the evidence base. Major research projects that contribute to our understanding of how gambling harm affects communities, like our series of Victorian population gambling and health studies, are also commissioned. This research is vital for understanding harm, its sources, prevalence, and how individuals and at-risk groups are affected. It is also critical to refining our strategies and programs.

High-quality research underpins all aspects of the Foundation's work and our advice to the Victorian Government and the VGCCC on policy and regulatory approaches to gambling harm.

### A world class research agenda

The Foundation's [Research agenda 2018–2022](#) noted a focus on the rapidly changing landscape of available gambling products and technological advancements, including new products and modalities such as online sports betting. We commissioned and released studies on topics such as gambling advertising, the impact of gambling on young people and school children, and the effects of direct marketing and wagering inducements.

Following extensive consultation, our soon-to-be-released *Gambling harm prevention research directions 2023–27* will support studies across diverse socio-demographic and multicultural populations under the broad themes of:

- 1) Gambling products and environments – online and land-based
- 2) Effects on community
- 3) Gambling harm prevention
- 4) Industry marketing
- 5) Recovery and support.



## 2. **Monitoring the gambling environment and disseminating knowledge**

The Foundation has a legislated role to capture and disseminate information about the regulation of gambling, including to assist people wishing to make submissions to inquiries or otherwise contribute to public discussions about gambling.

We monitor gambling trends and the application of new technologies and stay abreast of regulatory changes so we can provide accurate, up-to-date information and analyses of the Victorian, national and international gambling environments.

We also monitor and share the findings of research from around the world with stakeholders, including policymakers, regulators, academics, the treatment and support sector, industry and interested members of the public.

And we provide analyses of gambling expenditure as well as develop simple, easy-to-use figures to explain the prevalence and incidence of gambling harm, its causes, influences and effects. For examples, visit the Foundation's [Gambling in Victoria webpages](#).

## 3. **Raising community awareness of gambling harm**

The Foundation's consumer marketing campaigns and other communication activities focus on four priority areas that our behaviour change model identifies as most likely to influence actions to prevent or reduce gambling harm. The priorities are:

- 1) disrupt gambling normalisation by making young people aware of the risks and challenging industry spin
- 2) highlight harmful products and practices to build awareness of harmful tactics and product features so that consumers are better informed and more resilient
- 3) offer strategies and advice to those who gamble to mitigate the risk they will experience harm
- 4) make it easy to access help by reducing barriers to support and providing a range of options such as tailored services, apps and tools.

Reducing the stigma associated with gambling harm is an important focus of the Foundation's community awareness activities. People who experience gambling harm are not only stigmatised by community attitudes, but often by their own negative thoughts, which prevent them from seeking help.

The overarching theme of our annual Gambling Harm Awareness Week is Talk.Share.Support. During the week, we give professionals a forum to share their expertise, and support people who have recovered from gambling harm to talk about their experiences. Open conversations about the issue can help to improve community understanding of harm, while personal stories are powerful because they help break down stigma and offer a sense of hope and optimism. This can be an effective way of encouraging people who are struggling to seek support.

## 4. **Providing treatment and support services for people affected by gambling harm**

Gambler's Help agencies across Victoria are funded by the Foundation to offer [a range of services](#) to their communities, including support that is tailored to meet the needs of those at high risk of harm, such as young men, socially and geographically isolated people, First Nations communities, some multicultural populations, and people who are affected by issues such as mental ill-health.

Support options include therapeutic and financial counselling, which are available face-to-face, on the phone, via online chat, email and Zoom calls; telephone peer support; and online resources, including self-help apps.

For example, the Foundation's [100 Day Challenge](#) program offers participants 100 alternative activities to gambling over 100 days and an online support forum. For people who are not ready to participate in traditional interventions like counselling but need assistance to stop gambling, our clinically tested [Reset app](#) helps users to understand why they gamble and supports them to change their behaviour.

## 5. **Supporting professional development for those who provide treatment and support services**

We recognise the importance of ensuring that people who work in the gambling help sector, including in the Gambler's Help agencies funded by the Foundation, associated professionals and community primary prevention workers, have the opportunity to strengthen their knowledge and skills and keep up to date with relevant research, clinical approaches and prevention frameworks.

Our sector development strategy has a focus on enabling knowledge mobilisation, which we seek to maximise by:

- improving access to evidence of what works to reduce gambling harm
- making strategic use of evidence, including research, evaluation and data to generate new insights
- building connections and collaborating with partners who are committed to reducing gambling harm
- incorporating a range of experience, including professional and lived experience
- building capacity among our staff and stakeholders.

## **Enhancing our efficacy**

Consistent with the 2021 VAGO report, the Foundation has acted to better integrate evidence with program/activity design, communicate evidence to stakeholders and measure outcomes.

Our new outcomes framework will enable the Foundation to better measure the effectiveness, individually and collectively, of our strategic, integrated approach to developing and delivering treatment and support services, prevention programs, and professional development for those who work in the sector.

### 1. [Reducing gambling harm in Victoria: Outcomes framework](#) (2022, V1.1)

The *Reducing gambling harm in Victoria: Outcomes framework* was published in March 2022 and is the first of its kind in the relatively new field of gambling-related harm.

The framework describes the Foundation's long-term aspirations and sets the goals that guide our priorities. It comprises seven outcomes against which to measure progress towards achieving our purpose to prevent and reduce gambling harm for all Victorians.

The outcomes are:

- 1) Decrease access to potentially harmful gambling environments, products and characteristics
- 2) Decrease exposure to potentially harmful marketing of gambling products
- 3) Increase community understanding of gambling harm
- 4) Decrease stigma of people who experience gambling harm
- 5) Prevent uptake of underage gambling
- 6) Increase capability of people to prevent gambling harm
- 7) Decrease gambling harm experienced by people who access Foundation-funded services.

An initial outcomes framework baseline report has been completed and there is an intention to produce follow-up reports at regular intervals to track progress against each of the measures over time.

## 2. **Service system review**

This multi-phase assessment of the gambling harm treatment and support system will lead to a new service delivery model. A review of the current system has been completed and recommendations for the new model are at an advanced stage of development.

The aim is to deliver a modern, evidence-based, integrated system that aligns with best practice and can be monitored to improve outcomes for those who use, or are affected by, Gambler's Help services.

All aspects of the project have been informed by substantial consultations with treatment and prevention experts, people who have lived experience of gambling harm, as well as First Nations and multicultural communities.

Subject to funding, it is anticipated that rollout of the new service delivery model will begin from mid-2024.

### **Best practice in treatment and support**

The Foundation engaged Impact Co in September 2022 to review the gambling harm service system and develop recommendations for strengthening support for Victorians at risk of, or affected by, gambling harm. Impact Co will deliver its final report in late July 2023.

The review process undertaken by Impact Co has involved substantial research and consultation, including a literature review, service mapping exercise, and consultations and design workshops with subject matter experts, funded service providers, people with lived experience and other stakeholders.

This work has led Impact Co to conclude that a universal stepped model of care should be at the centre of gambling harm treatment and support services. A stepped care approach will align gambling harm services with contemporary best practice in the mental health system and ensure consistent statewide clinical practice, referral processes and access to integrated peer support services.

## 3. **Prevention programming framework**

This piece of work is another first of its kind in the field of gambling-related harm. It sets out the evidence base that underpins the Foundation's prevention approach and the basis upon which we determine priority groups and activities.

The prevention programming framework, which will be ready for release later this year, comprises five interdependent action areas that provide opportunities to reduce gambling-related harm. The action areas cover the full spectrum of prevention activities (primary, secondary and tertiary), focusing on:

- 1) tackling normalisation of gambling
- 2) building capacity in the community
- 3) developing prevention partnerships
- 4) upskilling for early detection and treatment efficacy
- 5) building evidence to reduce gambling harm.

The framework has been designed to ensure that the Foundation's prevention programs and projects form part of a cohesive, mutually reinforcing, evidence-based approach that clearly articulates the risk and protective factors for gambling harm that we seek to influence.

#### 4. **Sector development strategy**

The Foundation has developed an intentional approach to ensuring that knowledge gained through our research and evaluation activities is used to strengthen and improve programs and services. This includes creating easier pathways for people who have complex and comorbid conditions to access help for a gambling issue when they present to services that focus on other issues, such as mental ill-health, family violence or alcohol and other drug (AOD) issues.

The sector development strategy describes our approach to enhancing professional capability and building community capacity to prevent harm, respond to help-seeking patterns, and understand recovery. Pillars of the strategy include professional development sessions, communities of practice and conference participation.

By making academic research, evidence and experience – including lived experience – accessible and readily understandable, the Foundation supports our partners and other stakeholders to develop, implement and evaluate best practice approaches to gambling harm prevention, early intervention, and treatment and support.

## Working with community – case studies

### 1. **Love the game, not the odds**

The Foundation's Love the Game Sporting Club Program is a prevention initiative designed to combat the normalisation of gambling in sport. The program targets adults who have a strong influence over young Victorians involved in sport.

A unique three-tiered approach covers all levels of Victorian sport, coordinating activity across education, policy change, marketing and community engagement through partnerships with:

- 18 professional sporting clubs (including Victoria's 10 AFL teams and A-League soccer, Super Netball, Big Bash League/WBBL, NBL/WNBL and Super Rugby teams)
- community sport peak bodies (Victorian state sporting and governing bodies)
- more than 800 local Victorian sporting clubs.

Love the Game partners make a commitment to refuse sports betting sponsorships and participate in activities to raise concern about the risks and potential harms associated with sports betting, as well as equip young people to think critically about the risks. Professional clubs also commit to reducing any reliance on gambling revenue.

La Trobe University's Centre for Sport and Social Impact conducted an evaluation of the Love the Game program from 2020 to 2022. The evaluation involved a rigorous, outcomes-focused methodology to determine the collective impact of the program on the target group's attitudes, knowledge and behaviour.

Love the Game uses public health best practice and is underpinned by an academically recognised theoretical behaviour change framework, as well as research for addressing risk and protective factors for preventing gambling harm for young people. The evaluation used a suite of adaptable tools to ensure evidence could be iteratively applied, as it emerged, to continuously improve the program.

Key findings and achievements included:

- 87 per cent of young people who had completed a Love the Game education session reported they had a 'good' or 'very good' understanding of betting risk as a result
- 89 per cent of parents think it is important to have conversations with their child(ren) about the risks of sports betting and 66 per cent have done so
- 33 per cent of parents who regularly bet on sport reduced the amount of time spent talking about sports betting/odds in front of their child(ren) after seeing or hearing the Love the Game campaign
- regular sports bettors who recognised Love the Game were more likely than those who did not to agree that 'watching sport on TV/in stadium should be free from gambling ads' and less likely to agree that 'betting makes sport more exciting'
- 224 local Love the Game clubs had developed a gambling harm prevention policy and committed to actions to limit or reduce exposure of young people to gambling promotions at their club
- six Victorian-based AFL clubs are now divested of any pokies interests, and two of these clubs – Geelong and Western Bulldogs – have also removed all betting advertising at home games in stadiums within their control.

In 2021, La Trobe University published an academic research paper from the evaluation, which has been embedded into program development. It has been shared and promoted across funded and sector partners and was presented at the May 2023 Preventive Health Conference in Adelaide.

## 2. **Be Ahead of the Game School Education Program**

This statewide program provides free face-to-face and online information sessions to teachers, parents and students with the aim of increasing their understanding of the risks and harms associated with gambling and the availability of support for gambling issues.

Delivered by community engagement staff within Gambler's Help agencies, the program's evidence-based design and delivery is underpinned by:

- risk and protective factors for gambling harm prevention among young people, including age-appropriate messages and the socio-ecological model of health
- emerging research trends – two new modules were developed and implemented in 2022 that focus on preventing gambling-related harm from online gaming
- partnerships with education peak bodies, whose staff review content, ensure it aligns with updated school curriculums and promote it to their sector
- community-led, human-centred design and continuous improvement principles, with an enhancement feedback loop involving a community of practice and ongoing consultation with teachers, students and parents.

There is a strong level of engagement in the program, which comprises three core modules:

- *Your Money Matters* (Years 9–10 and 11–12) – financial literacy, budgeting, spending, borrowing, saving and risk
- *Know the Score* (Years 7–9 and 10–12) – critical thinking about the potential influences on gambling attitudes and behaviour, including analysis of media and advertising
- *When Gaming Meets Gambling* (Years 7–9 and 11–12) – students explore the blurred boundary between online gaming and gambling and are provided with strategies for safer online gaming, allowing them to make better informed choices.

In the six months from July to December 2022, 172 sessions were delivered, reaching 4,531 students across Victoria – a 63 per cent increase on sessions and 60 per cent increase on reach over the same reporting period the previous year. This was achieved amidst a backdrop of intense pressure on schools in 2022 as they responded to the effects of the 2020 and 2021 COVID restrictions.

An improved monitoring, evaluation and learning framework, implemented since 2021, has shifted the focus from output-based measures to outcomes relevant to program objectives, including pre- and post-session data collection. Of 1,561 responses from Year 10 to 12 students who completed a *Know the Score* presentation in 2021–22:

- 95 per cent agreed or strongly agreed that the presentation had improved their understanding of how advertising can make gambling seem more normal
- 83 per cent of students planned to put what they learnt into practice
- ‘good’ or ‘very good’ understanding of where people can go to get help for gambling harm increased from 44 per cent before the session to 94 per cent after the session.

### 3. **Reset how you think about gambling**

[The Reset app](#) was developed in response to research that suggested people who experience harm from gambling often prefer to engage with self-help activities before entering into treatment.

The app, which incorporates cognitive behavioural therapy and motivational interviewing techniques, has been clinically tested for use as an alternative to, or in combination with, traditional in-person counselling. To this end, the Gambler’s Help sector has received guidance on how to use the app with a client or recommend it to someone for use independent of counselling.

Users of the app can gain insights into why they gamble, set their own goals and work through a range of interactive modules and activities at their own pace that are designed to support them in:

- learning to cope with the urge to gamble
- avoiding unplanned gambling episodes
- dealing with relapse as a normal part of the recovery process.

Development of the innovative app was based on Foundation-funded clinical research. It represents an alternative to formal support services and has the potential to overcome issues associated with client disengagement while maintaining high-quality treatment efficacy. It also removes barriers to help seeking, such as stigma.

Reset has been provided to professionals working in adjacent sectors such as mental health and AOD services, is available free-of-charge on the App Store and Google Play and has been showcased at several national conferences and events.

At an average rate of 100 new sign-ups every month, 1,364 Victorians registered as Reset users in the 12 months to 30 June 2023.

A team of clinical researchers from Deakin University is currently evaluating Reset. The outcomes will contribute to a better understanding of how people access digital support for gambling harm and recommend enhancements for future iterations. The next steps will be incorporating those enhancements into the app and using the upgraded version to inform more effective practice in the gambling harm treatment sector.

## 4. Response to VAGO recommendations

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The recommendations made by VAGO in the *Reducing the Harm Caused by Gambling* report focused largely on embedding knowledge mobilisation into Foundation programs and evaluating their effectiveness.

Central to the recommendations and report commentary was VAGO's concern that the Foundation lacked an outcomes-based framework. It is pertinent to note that, as a key deliverable in the Foundation's 2020–21 business plan, development of an outcomes framework was already well advanced when VAGO conducted its audit.

The Foundation accepted VAGO's eight recommendations and on 18 March 2021 released an action plan for addressing them to coincide with the report being tabled in parliament (**Appendix A**). While ongoing COVID-19-related issues throughout 2021 caused delay in the commencement of some actions in the plan, particularly the service system review, significant work has been achieved.

The Foundation's board is responsible for determining that each VAGO recommendation is acquitted and for monitoring the ongoing implementation of actions associated with acquittal, as well as ensuring they are embedded into our business-as-usual approach.

Lessons learnt from the VAGO audit will be incorporated into the Foundation's most fundamental planning procedures, including identifying and formulating strategic priorities and developing business plans. The board will oversee this work, with regular progress reports from the Foundation.

A summary of the status of each recommendation is provided below. Further detail is included in **Appendix B**.

### Understanding gambling harm

#### Victorian Responsible Gambling Foundation:

- 1. ensure that evidence from its research informs the design and improvement of prevention programs and treatment services through:**
  - **requiring funded research to identify recommended actions for the Victorian Responsible Gambling Foundation to improve program and service practice, where appropriate**
  - **tracking progress in implementing the recommendations**
  - **reporting the progress to the Victorian Responsible Gambling Foundation's board and in its annual report.**

#### Current status and completed actions

This item was acquitted in March 2023 through endorsement by the Foundation's board, with significant work undertaken and a clear intention to ensure that redesigned prevention and treatment services incorporate research evidence and best practice.

Knowledge mobilisation principles have been integrated into relevant processes and supporting documentation developed, including to better monitor actions relating to Foundation-funded research findings. This allows us to collate and track the publication of recommendations, suggestions for their use, and the influence they have on external programs more effectively.

We have updated our procurement documentation and contract management approach to place greater emphasis on obtaining clear and practical research recommendations. Resources and templates have

been developed to assist Foundation staff in implementing these changes, as well as to plan knowledge mobilisation actions following the receipt of new research or evidence.

Our new sector development strategy focuses on mobilising research findings and new knowledge into prevention and treatment service design and delivery. The strategy prioritises upskilling people who work in the sector and supporting them to implement and use evidence-based best practice.

The Foundation's 2021–22 annual report highlighted the outcomes and application of recent research, as well as the important role this investment plays in understanding gambling harm and informing prevention, intervention and treatment programs.<sup>5</sup>

The Foundation board is provided with regular updates on the status of our knowledge mobilisation activities and the implementation of this, and all other VAGO recommendations.

#### Post-acquittal embedding and integration

The tracking of research findings/recommendations is being transitioned into business-as-usual practice through regular reporting to the Foundation's Executive Leadership Team and board.

Work is underway to ensure contract management processes require that responses to Foundation-funded research recommendations are tracked and agreed actions implemented. Further, a knowledge mobilisation process (knowledge into practice and practice into knowledge) will capture and use intelligence gained through non-research activities and expertise. This approach aligns with our response to VAGO recommendation 5.

The mobilisation of research into practice will primarily be a function of the sector development strategy, which complements the work underway to develop new service system and prevention delivery models that integrate evidence-based best practice.

### **Victorian Responsible Gambling Foundation:**

- 2. apply available research and evaluation and where appropriate, funds research and evaluation to improve the efficacy of treatment and support services, in areas identified through its service performance review, including:**
  - **integrating peer support as part of the Victorian Responsible Gambling Foundation's treatment and support services**
  - **investigating the causes of client disengagement with Gambler's Help services and using the findings to improve client engagement and retention in counselling**
  - **evaluating the Victorian Responsible Gambling Foundation's various treatment approaches for gambling harm to assess their effectiveness.**

#### Current status and completed actions

Responses to this recommendation are either in progress or completed.

The Gambler's Help Clinical Guidelines, which cover program scope, obligations, performance indicators and delivery requirements, have been updated to include peer support as an option for clients who might benefit from engaging with a person who has lived experience of gambling harm.

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<sup>5</sup> [Annual Report 2021–22](#), Victorian Responsible Gambling Foundation, 2022



The service system review considers the findings of previous reviews, client journey mapping and the efficacy of various treatment approaches. Peer support will be integrated into the new service model.

#### Post-acquittal embedding and integration

The service system review is well underway, and the Foundation is on track to complete it, make recommendations for a new treatment and support service delivery model, and commence implementing the new model from mid-2024.

A benefit of redesigning and documenting the evidence-base that informs the model will be the ability to periodically review it for new evidence and approaches, and update programs accordingly.

'Journeys towards and away from gambling harm' was the theme for the Foundation's 2023 grants for gambling research funding round. This theme supports research into relapse, which may have implications for clinical treatment, practices and support services.

## Preventing gambling harm

### Victorian Responsible Gambling Foundation:

3. **develop an evaluation and outcomes framework to guide prevention and treatment programs, supported by:**
  - **a prevention program design that clearly seeks to address the identified risk factors/ protective factors contributing to gambling harm**
  - **a common set of outcome or proxy outcome measures that can enable the tracking of performance of both individual programs and the collective performance of programs.**

#### Current status and completed actions

This item has been acquitted and completed.

Work to develop an outcomes framework preceded the VAGO audit and the Foundation released our *Reducing gambling harm in Victoria: Outcomes framework* in March 2022.

The framework describes the Foundation's long-term aspirations and how we will measure our progress towards achieving them. It is also a useful tool for any organisation or individual seeking to better understand gambling harm in Victoria and play a role in preventing and reducing harm.

#### Post-acquittal embedding and integration

The Foundation has placed significant emphasis on embedding an outcomes focus into everything we do. This is important as we begin the process of routinely monitoring and measuring our progress against the seven outcomes and associated indicators described in the *Reducing gambling harm in Victoria: Outcomes framework*.

It is also core to the substantial work underway to review our service support system and develop a new delivery model and prevention programming framework. And it has informed the development of our sector development strategy.

The framework is critical to our strategic thinking, including our business planning, and will be a significant consideration in determining our next set of strategic priorities. All matters put to the Foundation board already require explanation as to their alignment with the framework.

The findings of regular analysis of the Foundation's performance against the outcomes framework will guide the development and implementation of, and adjustments to, future strategies, programs and activities so that we remain on track to fulfil our purpose.

#### **Victorian Responsible Gambling Foundation:**

- 4. include assessment of the cost-effectiveness of prevention approaches in future evaluations and for the media campaigns aimed at reducing the risk from sports betting among young people.**

##### Current status and completed actions

This item was acquitted in March 2023 through endorsement by the Foundation's board, with significant work undertaken and a forward plan for the consideration of cost-effectiveness.

The Foundation has developed an evaluation framework that sets out the principles and general approaches to be used in designing future evaluations and to calculate cost-effectiveness within those evaluations. Procurement documentation has been updated to specifically include cost-effectiveness in future evaluation projects.

Further, we are seeking academic support to build on the cost-effectiveness principles within the evaluation framework to identify the most appropriate methodologies and effective measure/s to assess impact on gambling harm. A procurement process is underway.

##### Post-acquittal embedding and integration

Following completion of the project to identify appropriate methodologies and cost-effectiveness measures, these will be incorporated into the evaluation of relevant programs and activities and embedded in future program decision-making processes.

#### **Victorian Responsible Gambling Foundation:**

- 5. identify, share and promote better practices within the funded organisations, with particular focus on building community capacity for preventing gambling harm by providing:**
  - **tailored guidance and resources to support program design and delivery**
  - **opportunities for sharing learnings with and between funded organisations.**

##### Current status and completed actions

Responses to this recommendation are dependent on the outcomes of the service system review. Arrangements are in place to address the recommendation upon completion of the review.

The Foundation's sector development strategy will be enhanced with the embedding of an implementation plan for the new service delivery model. The strategy supports efforts to mobilise knowledge and build community capacity to prevent gambling harm.

The Foundation has established and/or re-established communities of practice for various treatment and prevention workforce groups so that funded partners can share knowledge, information and best practices within their field. Regular meetings are facilitated and supported by the Foundation.

##### Post-acquittal embedding and integration

Following acquittal of this item, we will continue to ensure sector development activities are intentionally planned, coordinated and delivered by the Foundation.

Implementation of the new service delivery model will have an impact on the support needs of the sector. Adjustments will be made to ensure these are aligned.

## Treating gambling harm

### Victorian Responsible Gambling Foundation:

6. **establish client information sharing and referral protocols between different treatment service options, including between:**
- **Gambling Help Online and all other Gambler's Help services**
  - **the local Gambler's Help services and peer support options**
  - **the Gambler's Helpline and Gambling Help Online services and programs for Aboriginal and Torres Strait Islander peoples and culturally and linguistically diverse communities, where appropriate.**

#### Current status and completed actions

Responses to this recommendation are in progress. Significant shifts in information sharing and referral will be enacted with the implementation of the new service delivery model.

Under the current arrangements, updates have been made to the Gambler's Help Clinical Guidelines to include the peer support option under available 'Client Services' to encourage Gambler's Help services to refer clients.

Client information sharing and referral protocols between different treatment services are being considered as part of the service system review.

#### Post-acquittal embedding and integration

Arrangements for cross-referral between Foundation-funded gambling support services will be incorporated into funding agreements, and requirements included in associated program and clinical guidelines for providers.

Monitoring the implementation of these arrangements, and ongoing compliance with them, will form a core component of the Foundation's contract management approach.

### Victorian Responsible Gambling Foundation:

7. **as part of the evaluation and outcomes framework outlined in recommendation 3:**
- **complete a strategic review of its core service datasets to identify deficiencies or quality issues that limit the usefulness of this data**
  - **further develop client-level outcome measures with the Gambler's Help service sector so that they measure efficacy and are fit for purpose.**

#### Current status and completed actions

Responses to this recommendation are in progress. Significant shifts in information sharing and referral will be enacted with the implementation of the new service delivery model.

Existing Foundation datasets have been assessed and those that are to be monitored have been included in the outcomes framework. Client-level outcome data was considered in the assessment.

Part of the service system review involves considering the data that will be available as a consequence of the new model. The aim is to identify an enhanced fit-for-purpose set of client outcome measures that will be incorporated into key performance indicators for service providers, against which they will be monitored.

#### Post-acquittal embedding and integration

Clear client data collection requirements will form part of the funding agreements for prevention and treatment providers under the new service delivery model. The precise data to be collected will be guided by the outcomes of the service system review. New data collection protocols will be developed, and compliance will be monitored and enforced via contract management arrangements.

The Foundation will analyse client data collected under the new model to guide improvements to service delivery and measure progress against relevant indicators in the outcomes framework.

### **Victorian Responsible Gambling Foundation, the Department of Justice and Community Safety, the Department of Health and the Department of Families, Fairness and Housing:**

- 8. establish systems and protocols for gamblers with co-occurring conditions that enable the Foundation and its funded entities to undertake holistic screening assessments and refer cases to appropriate services across mental health, alcohol and other drugs, homelessness and family violence services.**

#### Current status and completed actions

This recommendation was acquitted in July 2023 through endorsement by the Foundation's board.

Foundation consultations with the departments identified by VAGO determined that this recommendation would be best implemented through existing cross-government referral and screening arrangements.

An inter-departmental committee convened by the Foundation in March 2022 held a series of meetings at which it was agreed to explore the integration of Gambler's Help into the Family Violence Multi-Agency Risk Assessment and Management Framework (MARAM).

Considered the most efficient and effective means of coordinating and driving referral and screening across services, a draft implementation plan was then developed. The plan was endorsed by the DJCS MARAM Expert Advisor and the Foundation's Executive Leadership Team in February 2023.

#### Post-acquittal embedding and integration

The integration of Gambler's Help services into the MARAM Framework will align with the implementation of the Foundation's new service delivery model. This will ensure that Foundation-funded counselling services will use the MARAM assessment tool, which will include gambling-specific questions, and refer clients to the most appropriate services within the MARAM network.

The aim is to improve the client journey through an integrated approach that ensures people experiencing gambling harm are identified and can access suitable treatment and support. Other services that use the MARAM Framework will be able to screen their clients for gambling-related harm and refer them directly into the Gambler's Help service system. Likewise, clients who enter the treatment system through Gambler's Help will be screened for other issues, such as mental ill-health, and linked to relevant services.

The plan is to 'authorise' Gambler's Help services in Phase 3 of the MARAM reforms (late 2025), which means Gambler's Help will be explicitly named in the updated MARAM regulations.

### **What is the Family Violence Multi-Agency Risk Assessment and Management Framework?**

MARAM was established in 2018 to ensure that Victoria's service system can effectively identify, assess and manage family violence risk.

Relevant services provide support to people affected by family violence, mental ill-health, AOD issues and gambling harm.

Those authorised under MARAM align their policies, procedures, practice guidance and tools. They are supported by operational practice guidance and risk identification, and screening and assessment tools.

## 5. Gambling harm and the online environment

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### Foundation discussion paper

There is significant evidence for the risks associated with online gambling and for actions to mitigate or address the risks. The Foundation's February 2023 *Discussion paper: Gambling harm and the online gambling environment (Attachment 1)* is an up-to-date compendium of relevant academic and market research, public discourse, and policy and regulatory responses, such as the National Consumer Protection Framework for Online Wagering. Key points are summarised below.

#### Amplified risk

Online gambling is inherently high risk due to its immediate and continuous nature and the opportunity for large stakes on numerous sporting, racing and other events.

The risks are exacerbated by an exceedingly competitive operating environment with relatively low barriers to entry. Providers have strong incentives to grow markets and chase market share, as well as maximise profit. This contributes to an environment in which consumers are encouraged to gamble more often, for longer periods of time and with larger amounts of money.

Race and sports betting, which are now the largest interactive gambling markets in Australia, are among the gambling activities most associated with harm. Of Victorians who gambled regularly in 2020 (more than once a month), 33 per cent of those who bet on races and 38 per cent of those who bet on sports experienced gambling harm.

These products are persuasively offered via technologies that allow direct and largely unmoderated transactions between the provider, the consumer and the consumer's bank accounts. Further, inducements, complex offers, the availability of credit and ease of access to betting are associated with an increased risk of harm or harmful behaviour. Multibets, bonus bets, reward programs, early cash-outs and direct messages from gambling companies are all also linked to increased expenditure and riskier betting.

#### Advertising has normalised gambling

Gambling ads, especially sports betting promotions, have reached saturation levels in Australia across all media. The ads are run on free-to-air broadcasts, streaming services and social media, as in-program content, through product placement, and more. In addition, targeted promotions are delivered as specific messages to account holders through gambling apps, online and via other digital communications. An effect is a strong psychological and cultural association between sport and betting, which creates a sense that betting on sport is normal.<sup>6</sup>

Online gambling operators use sophisticated data analytics to develop highly targeted campaigns. As well as social media algorithms to target individuals, techniques include direct and 'dark' marketing, which refers to ads that can only be seen by the recipient. The content of these ads is difficult to regulate because they are not published where others can view them.

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<sup>6</sup> For example, while participation in sports betting in Victoria is growing in the high double digits, it remains the case that considerably less than 10 per cent of all adults place sports bets in a year. Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

At-risk groups such as young men are said to be ‘swamped’ by gambling ads delivered in this way, with those aged 18–24 now the largest group of sports bettors in Victoria. They also belong to the first generation to have grown up surrounded by gambling ads.

Excessive advertising has been shown to normalise gambling, especially for children. Moreover, the advertising is recognised as triggering for people who have lived experience, or are at risk, of gambling harm. Many parents are concerned about, and overwhelmed by, the volume of gambling ads reaching their children, with studies consistently showing they want further restrictions.

### **Sport is synonymous with gambling**

Recent data show that the COVID-19 pandemic and lengthy periods of lockdown significantly increased the proportion of sports bettors who gamble online.

Sportsbet stated in 2021 that online betting accounted for 86 per cent of the total Australian sports betting market in 2020, up from 54 per cent in 2015. The company, which claims a 50 per cent share of the Australian online wagering market, reported an increase in betting turnover of 44 per cent in 2020 and a further 20 per cent in 2021. Active player accounts increased by 26 per cent in 2020 and a further 27 per cent in 2021.

Tabcorp claimed a 25 per cent share of the Australian online wagering market in 2021. It reported a 27 per cent increase in online betting turnover in 2021 and a 10 per cent increase in active player accounts.

Online wagering expenditure has not reverted to pre-pandemic levels in Victoria since the lifting of lockdown measures. In 2022, Victorian wagering losses were almost 50 per cent higher than they were in 2019, at \$2.3 billion compared to \$1.56 billion. This increase in losses is indicative that gambling harm will have increased as well.

That this expenditure is consistently and substantially higher than pre-pandemic levels suggests a permanent shift in consumer behaviour, including a major increase in the percentage of those using apps and computers to gamble online.

### **Gambling-like gaming is risky**

Online games that include loot boxes, or that simulate or work in ways similar to features associated with gambling harm, encourage risky behaviour. While these products fall short of some definitions of gambling, young people’s exposure to them normalises gambling-like transactions. The consequences can include misperceptions of risk, unrealistic expectations of gambling wins, and harms such as excessive loss of time and/or money spent on the activity. The Foundation provided an exploration of the parallels between some online games and gambling products in our submission to the Senate Environment and Communications References Committee [Inquiry in relation to Gaming micro-transactions for chance based items](#).

## **You win some, you lose more**

The Foundation welcomed [You win some, you lose more](#), the report of the House of Representatives Standing Committee on Social Policy and Legal Affairs *Inquiry into online gambling and its impacts on those experiencing gambling harm*. The report was tabled in the Australian Parliament on 28 June 2023.

The non-partisan Committee’s embrace of a public health approach to preventing and reducing gambling harm, which is consistent with the Foundation’s approach, has given rise to recommendations that focus on consumer protection at a population level. This is potentially a breakthrough moment in Australian public health.

The Committee's recommendations address issues raised by Foundation-funded and other academic research. These include availability, exposure, advertising and normalisation. They also support greater access to online gambling-related data for academic research and, equally important, use of that data for the creation and evaluation of harm reduction and prevention measures.

## Future focus

Participation in online gambling will continue to increase as new generations of young people reach adulthood. Lifelong exposure to prolific gambling ads will have normalised for them the idea that having a punt with mates is a rite of passage, and they will partake enthusiastically – especially men – unaware of, or unprepared for, the fact that for some of them this will lead to harm.

The power of digital technology is continuing to transform the gambling environment, in terms of products available, as well as how they are delivered and promoted. It is also producing new opportunities and possibilities for reducing harm and risk of harm. High levels of surveillance of the environment will therefore remain crucial.

Even if the Parliamentary Committee's recommendation for a comprehensive ban on gambling advertising is taken up, the tobacco experience has taught us that reversing the normalising effects of years of intensive advertising and other promotional activities will be a long-term goal.

To successfully reduce and prevent gambling harm, a public health approach is imperative. Key to this is integrating the expertise of people with lived experience of harm, along with the findings of high-quality research, into the development of consumer campaigns and services. Interventions should also reflect consumer needs, which can be achieved by anticipating, and responding to, new challenges and incorporating the lessons learnt from program evaluations into new activities.



## Appendix A

### Victorian Responsible Gambling Foundation (VRGF) action plan to address recommendations from VAGO report, March 2021

Victorian Auditor-General's Office (VAGO) recommendation	VRGF action	Completion date
<p>1. VRGF ensure that evidence from its research informs the design and improvement of prevention programs and treatment services (see Section 2.2), through:</p> <ul style="list-style-type: none"> <li>• requiring funded research to identify recommended actions for the Foundation to improve program and service practice, where appropriate</li> <li>• tracking progress in implementing the recommendations</li> <li>• reporting the progress to the Foundation's board and in its annual report.</li> </ul>	<p>Accepted.</p> <p>Acknowledging the Foundation's national and international reputation as a funder of high-quality research into the gambling environment and harm prevention interventions, the Foundation will:</p> <ul style="list-style-type: none"> <li>• ensure that funded research is required to identify recommended actions to improve program and service practice, where appropriate</li> <li>• continue to improve processes to record and track progress when implementing recommendations from evaluation and research evidence</li> <li>• report progress to the Board and in the Foundation's annual report.</li> </ul>	<p>December 2021</p>
<p>2. VRGF apply available research and evaluation and where appropriate, fund research and evaluation to improve the efficacy of treatment and support services, in areas identified through its service performance review, including (Sections 2.1, 3.3, 4.2, and 4.6):</p> <ul style="list-style-type: none"> <li>• integrating peer support as part of the Foundation's treatment and support services (Section 4.2)</li> <li>• investigating the causes of client disengagement with Gambler's Help services and use the findings to improve client engagement and retention in counselling (Section 4.6)</li> <li>• evaluating the Foundation's various treatment approaches for gambling harm to assess their effectiveness (see Sections 2.1 and 4.6).</li> </ul>	<p>Accepted.</p> <p>Subsequent to the development of an outcomes framework for the Foundation, the Foundation will assess client needs and review areas identified through the previous service review. Work to improve the efficacy of treatment and support services will be actioned in line with the Foundation's strategic plan 2021-22 to 2023-24.</p>	<p>July 2023</p>

Victorian Auditor-General's Office (VAGO) recommendation	VRGF action	Completion date
<p>3. VRGF develops an evaluation and outcomes framework to guide prevention and treatment programs, supported by: (Section 3.3)</p> <ul style="list-style-type: none"> <li>• a prevention program design that clearly seeks to impact the identified risk factors/protective factors contributing to gambling harm (see Section 3.1)</li> <li>• a common set of outcome or proxy outcome measures that can enable the tracking of performance of both individual programs and the collective performance of programs (see Sections 3.3 and 3.4).</li> </ul>	<p>Accepted.</p> <p>As acknowledged in the VAGO report, an outcomes framework to assess the Foundation's impact on gambling harm prevention and reduction, including consideration of the risk and protective factors that contribute to gambling harm, is presently under development. A common set of outcome or proxy outcome measures will be considered in this process.</p>	<p>July 2021</p>
<p>4. VRGF include assessment of the cost-effectiveness of prevention approaches in future evaluations and for the media campaigns aimed at reducing the risk from sports betting among young people (see Section 3.2).</p>	<p>Accepted.</p> <p>The Foundation's prevention programs are unique globally. Measuring cost effectiveness in preventing/reducing gambling harm is challenging and to the Foundation's knowledge has not been measured in other jurisdictions. The Foundation is currently measuring impact and effectiveness across the prevention program. Future evaluations will include a requirement to assess cost-effectiveness of prevention approaches, where appropriate.</p> <p>Subsequent to the development of an outcomes framework for the Foundation, campaign effectiveness measures will be reviewed and revised where necessary to better demonstrate the impact of our multifaceted strategy to reduce the risk from sports betting among young people.</p>	<p>December 2021</p>
<p>5. VRGF identify, share and promote better practices within the funded organisations, with particular focus on building community capacity for preventing gambling harm by providing:</p> <ul style="list-style-type: none"> <li>• tailored guidance and resources to support program design and delivery (see Section 3.4)</li> <li>• opportunities for sharing learnings with and between funded organisations (see Section 3.4).</li> </ul>	<p>Accepted.</p> <p>The Foundation has mature and strong partnerships with community-based organisations delivering prevention programs within communities. The Foundation identifies, shares and promotes practice improvements with its funded partners, and will continue to develop its processes to build community capacity for preventing gambling harm.</p>	<p>July 2022</p>

Victorian Auditor-General's Office (VAGO) recommendation	VRGF action	Completion date
<p>6. VRGF establish client information sharing and referral protocols between different treatment service options, including between:</p> <ul style="list-style-type: none"> <li>• Gambling Help Online and all other Gambler's Help services (see Section 4.2)</li> <li>• the local Gambler's Help services and peer support options (see Section 4.2)</li> <li>• the Gambler's Helpline and Gambling Help Online services and programs for Aboriginal and Torres Strait Islander peoples and culturally and linguistically diverse communities, where appropriate (see Section 4.3).</li> </ul>	<p>Accepted.</p> <p>The Foundation has commenced discussions and planning to enable client information sharing and referral protocols to be established between different treatment service options, including working with other jurisdictions to further integrate the online and Victorian systems. The initial priority in 2021-22 is the development of referral protocols between Gambler's Help services and peer support options.</p>	<p>July 2023</p>
<p>7. VRGF as part of the evaluation and outcomes framework outlined in recommendation 3:</p> <ul style="list-style-type: none"> <li>• complete a strategic review of its core service datasets to identify deficiencies or quality issues that limit the usefulness of this data (see Sections 4.2, 4.3 and 4.6)</li> <li>• further develop client-level outcome measures with the Gambler's Help service sector so that they measure efficacy and are fit for purpose (see Section 4.6).</li> </ul>	<p>Accepted.</p> <p>Subsequent to development of the outcomes framework, the Foundation will review core service datasets and work with the Gambler's Help service sector to further develop client level outcomes measures to ensure service efficacy</p>	<p>July 2022</p>
<p>8. Victorian Responsible Gambling Foundation, the Department of Justice and Community Safety the Department of Health and the Department of Families, Fairness and Housing establish systems and protocols for gamblers with co-occurring conditions that enable the Foundation and its funded entities to undertake holistic screening assessments and refer cases to appropriate services across mental health, alcohol and other drugs, homelessness and family violence services (see Sections 4.4 and 4.5).</p>	<p>Accepted.</p> <p>The Foundation will continue to explore opportunities to work with the Departments of Justice and Community Safety, Health, and Families, Fairness and Housing to establish practical and program-based systems and protocols to support identification, treatment and cross-agency referral of gamblers with co-occurring conditions.</p>	<p>December 2021</p>

## Appendix B

### Status of actions to address VAGO recommendations, July 2023

VAGO recommendation	Foundation action	Completed actions	Next steps	Status
<p>1. Ensure that evidence from its research informs the design and improvement of prevention programs and treatment services through:</p> <ul style="list-style-type: none"> <li>requiring funded research to identify recommended actions for the Victorian Responsible Gambling Foundation to improve program and service practice, where appropriate</li> <li>tracking progress in implementing the recommendations</li> <li>reporting the progress to the Victorian Responsible Gambling Foundation's board and in its annual report.</li> </ul>	<p>Acknowledging the Foundation's national and international reputation as a funder of high-quality research into the gambling environment and harm prevention interventions, the Foundation will:</p> <ul style="list-style-type: none"> <li>ensure that funded research is required to identify recommended actions to improve program and service practice, where appropriate</li> <li>continue to improve processes to record and track progress when implementing recommendations from evaluation and research evidence</li> <li>report progress to the board and in the Foundation's annual report.</li> </ul>	<ul style="list-style-type: none"> <li>Background document outlining knowledge mobilisation principles and a tracking spreadsheet of research findings and actions against those findings developed.</li> <li>Targeted changes to the Foundation's procurement documentation identified and updated.</li> <li>Incorporated into the updated contract management approach.</li> <li>Resources and templates designed to assist teams and staff within the Foundation to plan knowledge mobilisation actions developed.</li> <li>Foundation 2021–22 annual report included progress against implementing this recommendation and regular reporting undertaken to Foundation board.</li> <li>Sector development strategy in development, with continued work to ensure knowledge mobilisation (knowledge into practice and practice into knowledge) processes are embedded. This work aligns with recommendation 5.</li> <li>Internal working group established to deliver on this recommendation –minimum deliverables include supporting paperwork and processes and ongoing support for knowledge mobilisation.</li> </ul>	<ul style="list-style-type: none"> <li>Transition to tracking research findings/recommendations and embed into business-as-usual processes.</li> <li>Continue to identify and implement evidence into programs, particularly via the sector development strategy.</li> </ul>	Acquitted

VAGO recommendation	Foundation action	Completed actions	Next steps	Status
<p>2. Apply available research and evaluation and where appropriate, funds research and evaluation to improve the efficacy of treatment and support services, in areas identified through its service performance review, including:</p> <ul style="list-style-type: none"> <li>• integrating peer support as part of the Victorian Responsible Gambling Foundation's treatment and support services</li> <li>• investigating the causes of client disengagement with Gambler's Help services and using the findings to improve client engagement and retention in counselling</li> <li>• evaluating the Victorian Responsible Gambling Foundation's various treatment approaches for gambling harm to assess their effectiveness.</li> </ul>	<p>Subsequent to the development of an outcomes framework for the Foundation, the Foundation will assess client needs and review areas identified through the previous service review. Work to improve the efficacy of treatment and support services will be actioned in line with the Foundation's strategic plan 2021–22 to 2023–24.</p>	<ul style="list-style-type: none"> <li>• Gambler's Help Clinical Guidelines updated to include the peer support option under available 'Client Services' to encourage Gambler's Help services to refer clients. New guidelines have been released for the sector.</li> <li>• Previous service reviews, client journey mapping and the efficacy of various treatment approaches for gambling harm are being considered in the ongoing service delivery review.</li> <li>• Recognition within the service system review that peer support is to be integrated into the new service model.</li> </ul>	<ul style="list-style-type: none"> <li>• Complete service system review and implement new service delivery model.</li> <li>• New service delivery model to integrate peer support within a stepped care approach to treatment.</li> </ul>	In progress

VAGO recommendation	Foundation action	Completed actions	Next steps	Status
<p>3. Develop an evaluation and outcomes framework to guide prevention and treatment programs, supported by:</p> <ul style="list-style-type: none"> <li>a prevention program design that clearly seeks to address the identified risk factors/ protective factors contributing to gambling harm</li> <li>a common set of outcome or proxy outcome measures that can enable the tracking of performance of both individual programs and the collective performance of programs.</li> </ul>	<p>As acknowledged in the VAGO report, an outcomes framework to assess the Foundation's impact on gambling harm prevention and reduction, including consideration of the risk and protective factors that contribute to gambling harm, is presently under development. A common set of outcome or proxy outcome measures will be considered in this process.</p>	<ul style="list-style-type: none"> <li><i>Reducing gambling harm in Victoria: Outcomes framework</i> completed and released.</li> <li>Framework includes a range of measures including outcome and proxy measures to consider the impact of programs as a whole.</li> <li>Implementation of the framework across strategy, planning, monitoring, evaluation and reporting is in progress, with a baseline report on the framework developed.</li> </ul>	<ul style="list-style-type: none"> <li>Baseline report against the outcomes framework developed.</li> <li>Continue to report against the outcomes framework regularly.</li> </ul>	Acquitted

VAGO recommendation	Foundation action	Completed actions	Next steps	Status
<p>4. Include assessment of the cost-effectiveness of prevention approaches in future evaluations and for the media campaigns aimed at reducing the risk from sports betting among young people.</p>	<p>The Foundation's prevention programs are unique globally. Measuring cost effectiveness in preventing/reducing gambling harm is challenging and to the Foundation's knowledge has not been measured in other jurisdictions. The Foundation is currently measuring impact and effectiveness across the prevention program. Future evaluations will include a requirement to assess cost-effectiveness of prevention approaches, where appropriate.</p> <p>Subsequent to the development of an outcomes framework for the Foundation, campaign effectiveness measures will be reviewed and revised where necessary to better demonstrate the impact of our multifaceted strategy to reduce the risk from sports betting among young people.</p>	<ul style="list-style-type: none"> <li>• Developed an evaluation framework that will articulate appropriate cost-effectiveness approaches and principles to be used when designing future evaluations and calculating cost-effectiveness as a part of the evaluations.</li> <li>• Procurement documentation updated to include consideration of cost-effectiveness for evaluation projects. Actioned within enhanced procurement guidance documentation and contract and grants management processes.</li> <li>• Established and internal Evaluation Steering Committee to support the updated evaluation approach.</li> <li>• Commenced procurement of academic support to identify best cost-effectiveness methodology and measure/s to assess the impact on gambling harm.</li> </ul>	<ul style="list-style-type: none"> <li>• Procure support to identify the best cost-effectiveness measures.</li> <li>• Implement an appropriate methodology and measure/s in future program decision making and evaluation processes.</li> </ul>	Acquitted

VAGO recommendation	Foundation action	Completed actions	Next steps	Status
<p>5. Identify, share and promote better practices within the funded organisations, with particular focus on building community capacity for preventing gambling harm by providing:</p> <ul style="list-style-type: none"> <li>tailored guidance and resources to support program design and delivery</li> <li>opportunities for sharing learnings with and between funded organisations.</li> </ul>	<p>The Foundation has mature, strong partnerships with community-based organisations delivering prevention programs within communities. The Foundation identifies, shares and promotes practice improvements with its funded partners, and will continue to develop its processes to build community capacity for preventing gambling harm.</p>	<ul style="list-style-type: none"> <li>Sector development strategy finalised. To be enhanced through the embedding of the new service delivery model implementation plan.</li> <li>Sector development strategy focuses on mobilising knowledge and building community capacity for preventing gambling harm.</li> <li>Working group established to guide implementation of the sector development strategy.</li> </ul>	<ul style="list-style-type: none"> <li>Continue working group meetings to ensure sector development activities are intentionally planned, coordinated and delivered.</li> <li>Support implementation of new service delivery model.</li> <li>Adjust sector development approach to align with service system reviews.</li> </ul>	In progress
<p>6. Establish client information sharing and referral protocols between different treatment service options, including between:</p> <ul style="list-style-type: none"> <li>Gambling Help Online and all other Gambler's Help services</li> <li>the local Gambler's Help services and peer support options</li> <li>the Gambler's Helpline and Gambling Help Online services and programs for Aboriginal and Torres Strait Islander peoples and culturally and linguistically diverse communities, where appropriate.</li> </ul>	<p>The Foundation has commenced discussions and planning to enable client information sharing and referral protocols to be established between different treatment service options, including working with other jurisdictions to further integrate the online and Victorian systems. The initial priority in 2021–22 is the development of referral protocols between Gambler's Help services and peer support options.</p>	<ul style="list-style-type: none"> <li>Gambler's Help Clinical Guidelines updated to include a peer support option under available 'Client Services' to encourage Gambler's Help services to refer clients. The new guidelines have been released to the sector.</li> <li>Client information sharing and referral protocols between different treatment service options will be considered in the service system review.</li> <li>Requirements for cross-referral and system capability to be included in funding agreements under the new service delivery model.</li> </ul>	<ul style="list-style-type: none"> <li>Complete service system review and implement new service delivery model.</li> <li>Incorporate funded support options into new service delivery model.</li> </ul>	In progress



VAGO recommendation	Foundation action	Completed actions	Next steps	Status
<p>7. As part of the evaluation and outcomes framework outlined in recommendation 3:</p> <ul style="list-style-type: none"> <li>complete a strategic review of its core service datasets to identify deficiencies or quality issues that limit the usefulness of this data</li> <li>further develop client-level outcome measures with the Gambler's Help service sector so that they measure efficacy and are fit for purpose.</li> </ul>	<p>Subsequent to development of the outcomes framework, the Foundation will review core service datasets and work with the Gambler's Help service sector to further develop client-level outcomes measures to ensure service efficacy.</p>	<ul style="list-style-type: none"> <li>Existing Foundation datasets assessed and those to be monitored identified and included in the outcomes framework.</li> <li>Client-level outcome data was considered as part of the assessment, informing the scope and development of the service system review.</li> <li>Service system review has commenced. Its scope includes reviewing core datasets and identifying an enhanced, fit-for-purpose core client dataset and outcomes measures.</li> <li>This enhanced dataset will be incorporated into funding agreements and associated performance management processes under the new service delivery model.</li> </ul>	<ul style="list-style-type: none"> <li>Complete service system review and implement new service delivery model.</li> <li>Data collection to be guided by new model.</li> <li>New data collection protocols to be developed.</li> </ul>	In progress

VAGO recommendation	Foundation action	Completed actions	Next steps	Status
8. Establish systems and protocols for gamblers with co-occurring conditions that enable the Foundation and its funded entities to undertake holistic screening assessments and refer cases to appropriate services across mental health, alcohol and other drugs, homelessness and family violence services.	The Foundation will continue to explore opportunities to work with the Departments of Justice and Community Safety, Health, and Families, Fairness and Housing to establish practical and program-based systems and protocols to support identification, treatment and cross-agency referral of gamblers with co-occurring conditions.	<ul style="list-style-type: none"> <li>• Consultation across government agencies led to the establishment of an inter-departmental committee and associated working group to explore the feasibility of integrating Gambler's Help Services into the MARAM framework. This is deemed feasible and desirable.</li> <li>• MARAM working group with DJCS, and Community Affairs Victoria MARAM Expert Advisors established.</li> <li>• Foundation participates in cross-DJCS MARAM Information Sharing Working Group.</li> <li>• Draft multi-year MARAM implementation plan completed.</li> </ul>	<ul style="list-style-type: none"> <li>• Seek board endorsement to acquit the recommendation.</li> <li>• Implement MARAM protocols within new service delivery model, including in the sector support and change management strategy.</li> <li>• Note implementation plan will be adjusted to align with service system model review final outcomes.</li> </ul>	Acquitted

Submission to the Public Accounts and Estimates  
Committee of Parliament Inquiry into the Victorian  
Auditor-General's reports no. 99: Follow up of  
Regulating Gambling and Liquor (2019) and no. 213:  
Reducing the Harm Caused by Gambling (2021)

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