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19 January 2017

Budget Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600

Dear Treasury staff,

Thank you for the opportunity to provide some recommendations to inform your decision making when formulating the upcoming federal budget.

About us

Bentleigh Bayside Community Health (BBCH)

BBCH is a not for profit community health service that provides a comprehensive range of primary health and community support services from sites in Bentleigh East and Sandringham. These services include Dental, Physiotherapy, Dietetics, Podiatry, Hydrotherapy, Speech Pathology, Gambler's Help, Community Transport and Activity Programs.

BBCH has a strong tradition of commitment to community participation via volunteering, with an increasing emphasis on consumer representation at all levels across the organisation.

We receive funding from Federal, State and Local Government and work in partnership with other community agencies.

- Our Vision: Healthy People, Healthy Communities
- Our Purpose: understand and meet the health and well-being needs of the community as a socially responsible business

BBCH incorporates Gambler's Help Southern (GHS). GHS is the largest problem gambling service provider in Australia. Bentleigh Bayside Community Health has maintained continuous contractual funding for this program for 23 years since its conception in 1994. Services provided by Gambler's Help Southern include:

- Therapeutic Counselling
- Financial Counselling
- Community Education
- Venue Support
- Specialist Portfolio Engagement Services



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The information addressed in this submission reflects learnings and observations when working with a cross section of community members.

We invite you to contact Pam Mutton on 9575 5361 or Pam.mutton@bbch.org.au to discuss any aspect of this submission and our recommendations.

A handwritten signature in black ink, appearing to read 'Amanda Murphy', with a large, stylized loop at the end.

Amanda Murphy
Chief Executive Officer

Submission

The establishment of a National Commission for Gambling Regulation including on-line gambling.

The Australian market place invites easy access to companies wishing to provide gambling services. This is achieved as access to the Australian market is gained by paying a license fee to a single state or territory. This is increasingly being used by overseas companies, the result is one jurisdiction receives a license fee, while all states and territories provide resources to support those impacted by losses arising from problem gambling. The increasing availability of on-line gambling means this piecemeal approach is no longer relevant in the Australian financial market place.

The establishment of a national regulatory framework will see the consistent application of regulation particularly in relation to:

- The removal of jurisdictional barriers for the resolution of complaints between states and territories within Australia including the application of consistent penalties associated with breaches of relevant legislation and adopted code of conduct.
- Restriction of advertising including Problem Gambling services to be prominently and unambiguously displayed on all advertising and communication.
- The prohibition of in play gambling.
- The prohibition of the use of the term gaming to describe gambling activities.
- The prohibition of inducements to participate in gambling including a prohibition on promotional free bets.
- The prohibition of any form of credit to consumers.
- The validation of proof of age for new accounts within 48 hours. The prohibition of gambling prior to the validation of proof of age.
- The establishment of a national Self-Exclusion data base. This database would be universal to all providers and easy to access for consumers.
- The provision of full public financial reporting by providers including on-line providers.
- The immediate availability of all winnings to consumers.
- The mandatory provision of a Player Activity Statements to all consumers listing all transactions that have been accrued throughout the year, provided on an annual basis as a minimum.
- A percentage of profits to be made available to Problem Gambling Support Services.
- The establishment of a monetary fund that will aid in the provision of problem gambling research including the introduction of algorithm software to monitor consumer betting trends for intervention purposes.

This would see the better targeting of resources and a consistent approach to access to gambling in the Australian market place.

Recommendation: It is recommended the regulation of the provision of gambling be undertaken at a federal level with a consistent approach to regulation, support services and funding based on need.

Off shore gambling providers not registered in Australia

The use of disruptive technology has seen the growth of international providers entering the Australian market and providing online gambling services to Australian residents. For example: recently Lottoland was awarded a five-year license by the Northern Territory Racing Commission to [open online gambling in international lotteries to the Australian market place](#). While the tickets in this lottery are purchased in Australia and would be subject to GST, the entity which runs the lottery is based overseas and does not pay corporate tax within Australia.

Recommendation: It is recommended that Treasury review the findings of Australia's Future Tax system report and reconsider these in light of the increased use of disruptive technology to provide access to on-line gambling. Australia's system could be amended to require gambling providers to have an Australian resident corporate structure and maintain accounts and records of profits which are taxed in Australia.

Increase support services for those at risk of family violence as a result of problem gambling

Research has shown that along with other factors there is a direct co-relation between the number of reports of family violence and the number of electronic gaming machines in an area, i.e. the greater number of reports of FV occurs when there are more EGMs.¹

As Gamblers Help Financial Counsellors we see a variety of clients who are not themselves gamblers however are adversely affected by the losses of a family member. These affected others often find themselves at risk of homelessness or unable to meet family needs such as food. Many of these clients need immediate financial relief while they restructure financial arrangements to protect the family's income. Where the family member has employment income they are often not eligible for crisis support via Centrelink or relief agencies. The current systems are insufficient to adequately assist families in this situation.

Recommendation: the provision of increased financial resources to support families of problems gamblers with crisis support where they are impacted by the actions of a problem gambler. This can be achieved by better understanding the impacts of problem gambling and the development of emergency relief structures which reflect this understanding.

As Gamblers Help therapeutic counsellors we are seeing increasingly complex cases. This is driven by the increase in reporting surrounding family violence and the reduction of mental health services provided under the Medicare funding model. As a result the current funding levels of Gamblers Help services are insufficient to adequately assist families in this situation.

Recommendation: further resources be made available to provide therapeutic treatment services to those agencies supporting problem gamblers and their families.

It is noted that the Federal government funds a number of problem gambling financial counselling positions which are not supported by therapeutic services. This limits opportunities to resolve the trauma or mental health issues which exacerbate the behaviour.

Recommendation: It is recommended that Federal funding be directed to state based Gamblers Help organisations to enable increased flexibility in the provision of services and to ensure greater cohesion of service provision.

Gambling and children

Gambler's Help staff are increasingly aware of the conditioning of children towards gambling behaviour. This arises due to the pervasive nature of gambling advertising in sport and the encroaching of gambling games in apps aimed at children. E.g. many popular games have a scratch ticket to gain a prize, a pick a box lottery at the end of a quest to determine the prize or spinning wheel to gain a life or bonus item.

Online services also enable players of online sports games to bet on the outcome of their matches. With age checks as simple as the question "are you over 18?" there is little restriction on accessing these services.

We also see a number of clients who are introduced to gambling by parents at an early age due to regular trips to gambling venues where incentives such as low cost meals and play spaces are available. When these children are older are likely to accompany parents into gambling areas.

Recommendation: It is recommended that the government fund specific research into gambling in youth and impact of advertising and in game gambling on attitudes. This may then lead to advertising restrictions or funding of preventative services aimed at young people.

¹ <https://aifs.gov.au/agrc/publications/impact-gambling-problems-families/what-are-impacts-gambling-problems-families>

Superannuation hardship rules

As financial counsellors we regularly work with clients that have had their income reduced due to illness or accident. This can make meeting debt repayments arising from arrangements entered into while working unmanageable. We observe that the fear of homelessness leads clients to ensure rent and mortgage payments are made while other debts are not.

Depending on the source of income the solutions to managed debts for these clients will vary e.g. a client covered by TAC is ineligible to apply for a legal early release of superannuation under hardship which is limited to those in receipt of Centrelink benefits. By contrast a person with rent arrears or other debts cannot access an early release on compassionate grounds which only addresses payment of mortgage arrears or medical events.

This inconsistency impacts a number of clients who are receiving payments from TAC, Workcover or from income protection insurance and are not eligible to use the early release of superannuation provisions. These payment types should be included for assessing severe financial hardship.

Recommendation: It is recommended that the early release of superannuation provisions relating to hardship be expanded to include those in receipt of TAC, Workcover and income protection for 26 weeks and unable to meet reasonable living expenses.

Similar circumstances arise where a member of a household ceases employment and is not eligible for Centrelink or other compensation. This occurs when a spouse remains in employment and the cause of work separation is not related to illness or injury. In these circumstances the household has a significant drop in income and may not be able to manage debt entered into while employed. This could be resolved through the payment of a hardship benefit following an assessment of hardship with reference to evidentiary documentation. This documentation would include bank statements, overdue notices for credit cards and utilities.

Recommendation: It is recommended that the early release of superannuation provisions relating to hardship be expanded to include those meeting specified hardship criteria resulting from a change in household circumstances i.e. a household member being unemployed for 26 weeks and unable to meet reasonable living expenses.

Changed postal delivery arrangements

In the short period since the introduction of Australia Post's new delivery service standards, of 2- 6 business days, we have seen a number of clients receiving mail which requires a 7 day response received on or after the response date. When applied to bills and fines this can lead the client to paying penalties on an account which they were unaware of or an inability to plan for a larger than usual account.

The flow on effect of this will adversely impact consumers on tight budgets who will be unable to take advantage of early payment discounts and find themselves increasingly paying penalties.

Organisations should be required to extend the payment times and laws governing receipt and response to information should have each time increment by 4-7 days to cater for the unintended consequence of this change in market conditions.

Recommendation: the government should conduct a wholesale review of legislation to determine the appropriateness of the timeframes to respond to correspondence and fines. This should be extended to all tiers of government and be acknowledged in Australia's courts.

ASIC registers enabling perpetrators of family violence to locate former partners

Section 117(2)(g) of the Corporations Act requires a physical address as the registered address of a company. While Section 205D gives an exemption in some cases a physical address is still required. For a small number of companies this can lead to the location of a victim of family violence or place intermediaries at risk. This is increasingly the case as workers in lower socio- economic groups are asked to incorporate in order to undertake occupations such as cleaning.

Recommendation: It is recommended that a private register be maintained for at risk people. Application to use the register would be made following the recommendation of legal or enforcement services. The private subregistry should be subject to restricted access and notices served via ASIC in the event this is required.

Essential communication services extending to internet access

In recent times the government has increasingly moved electronic information gathering often via MyGov to communicate and interact with clients. This brings with it three key challenges:

1. Clients experiencing disadvantage do not have reliable access to an internet connection. This arises due to housing uncertainty i.e. a person living in insecure housing is unlikely to have a land line or cable internet connections. The use of free wifi services exposes clients to risk and requires them to have a portable device. The use of mobile phones is impractical as many use prepaid mobiles with limited data.
2. A number of tools such as tax returns and the Centrelink claim process are not supported for Ipad and other portable app based devices. However limited use mobile phone apps have been developed. This restricts access to people accessing services using these tools. This arises as the screens on mobile phones are small and many older clients do not use 'smart' phones. As a result these tools are inappropriate for many Centrelink and My age care users.
3. A number of clients are functionally illiterate or have barriers due to English as a second language. These clients are presenting as unable to meet online reporting obligations without assistance. E.g a functionally illiterate client needed to lodge a superannuation hardship claim. This needs to be done online through MyGov. Failed attempts to log on resulted in a locked account and significant time was required with the aid of a worker to unlock the account and submit the documentation.

Recommendation: It is recommended the government tailor apps to enable these to be used on IOS and android devices, as many older Australians have moved away from computers towards these devices.

Recommendation: It is recommended funding be provided to community agencies which regularly interact with disadvantaged or older community members i.e. council offices; community health centres and libraries. The purpose of the funding is to provide additional access to technology and guidance to enable clients to interact appropriately with government services.

Increased funding to enable timely assessment of Centrelink claims

Recently clients have reported periods of up to 6 months without a final assessment for benefits such as a carers benefit. This has placed households in difficulty both financially and emotionally e.g. where a couple have separated but living under the same roof. Pressure is placed on the care relationship associated with the lack of certainty around receipt of the carer benefit. A similar cases arise where a child is caring for parent and can lead to elder abuse.

The delays in assessing the information provided must introduce inefficiency within government agencies. A review should be undertaken to ensure that the communication and assessment processes are efficient and that clients are kept informed of the progress of their claim. This leads to inequity as a client is unable to object or progress a matter unless an assessment has been made.

While in some cases back payments are available, this is inappropriate if the client is unable to maintain secure housing or medical treatments while waiting for the assessment.

In the case of aged care assessments consumers may be entering into accommodation arrangements which are unaffordable as the need for accommodation occurs following a health crisis and the assessment process takes up to 3 months. The need to move a client experiencing dementia, on more than one occasion can lead to additional distress and impact on the person's welfare.

Recommendation: It is recommended the Government conduct a review into the operation of Centrelink assessment processes to ensure clients are not disadvantaged by the delays in processes.

Improvement in banking regulation to reduce credit over extension

We regularly identify circumstances where a client has been granted the opportunity to consolidate credit cards and small debts into a mortgage or single larger unsecured debt. However there is no obligation to close the accounts paid following the consolidation process. As GHS advisors we see many vulnerable clients who access these accounts and increase debt.

Recommendation: It is recommended that banks are required to close accounts or notify other banks of the need to close the accounts where the purpose of a loan or loan extension is to consolidate existing debt. A failure to do this should be considered a failure to comply with responsible lending standards.

AFSA language

We regularly see client s which require in language information about bankruptcy. A failure to fully understand the impact bankruptcy can adversely affect a client and their families.

Recommendation: It is recommended AFSA should be funded to provide documents such as the prescribed information in a variety of languages to ensure those people entering into bankruptcy are appropriately informed.

Monitoring funding

As an agency funded from federal, state and local government and independent sources, we are subjected to multiple reporting regimes. The standardisation of program reporting will lead to productivity gains and greater funds available to meet the needs of the services clients. As we experience an aging population and increased reporting of family violence the allocation of scarce resources to service provision is increasingly important.

Recommendation: It is recommended a program to identify the reporting needs of funders be analysed to provide a single reporting model for financial data and qualitative information.

Access to Centrepay

A number of clients are in receipt of payments which are ineligible to access Centrepay i.e. an SRSS payment. As these clients are often vulnerable, i.e. unable to speak English or functionally illiterate, they would benefit from accessing tools which help them manage finances such as ensuring rent and utilities are paid.

Recommendation: It is recommended Centrepay be extended to all Centrelink customers

Complex clients assessing specialist service is increasing due to Medicare caps

As a specialist service we are finding an increasing number of clients requiring ongoing complex needs support. We believe this is arising due to the increasing restrictions being placed by Medicare on clients accessing therapeutic counselling services.

Recommendation: It is recommended government review the funding model around psychological services.

Regulation and Funding required for consumer centred care

Cuts to Centrelink funding have led to long delays when seeking information or assistance. This has made seeking support in times of crisis a traumatic event. Additionally, In the case of family violence can expose clients to risk. As we move to a more client focused model of care with both the financial and therapeutic decisions being made by Centrelink clients and their families it is important that agencies are funded assist clients their decision making. This will arise as government agencies are less involved in individual client case management but a number of clients will continue to require case management support.

There is a concern that clients given the responsibility to direct their care spending will be targeted by unscrupulous parties offering advocacy services. There is a risk monies will be directed to non-existent or poor service. This could be resolved by caps on fees and charges an independent advocate can charge and regulation as to who can act as an advocate.

Recommendation: It is recommended that increased funding be provided to enable the non for profit sector to meet the additional demand for client case management.

Recommendation: It is recommended that the government consider restrictions on those able to offer advocacy services and the fees they can charge.

Recommendation: It is recommended a view only access to a MyGov account. This will allow an advocate to have access to view and assist with the client able to determine what information is available to view i.e. a client may permit access to Centrelink information but not Medicare information.