

Project and Policy Team  
Independent Gambling Authority  
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### **Submission in relation to current consultation on Codes and Regulations**

We note that the IGA is seeking comment in relation to the:

- Gambling Codes of Practice Notice 2013;
- Gambling Regulation--Employee Training--Prescription Notice 2013; and
- Gambling Regulation--Systems Criteria--Prescription Notice 2013.

SACOSS is the peak body for the community services sector in South Australia and our members provide key services to support problem gamblers and their families. The experience gained from these frontline services, plus the policy and research expertise of peak bodies should provide a valuable input for government in considering gambling regulation.

The sector recognises the importance of the codes of practice and notices under review. However, SACOSS is unable to put a substantive submission or any information to the review at this stage. This should not be interpreted as a lack of concern from the sector about the issues, nor an endorsement of either the current code and regulations, or the proposed changes.

SACOSS receives no funding from the IGA or from government for gambling advocacy. We have on many occasions over recent years made representations to government and the IGA highlighting the fact that we do not have the resources to keep relevant members informed of IGA and government processes and to aggregate and articulate the sector's position on gambling regulation. We believe this creates a serious imbalance in public policy. In other industries where there is a similar asymmetry of power and resources between industry and consumers (eg. utilities), funds are made available to underpin consumer advocacy so as to ensure the interests of vulnerable consumers are recognised and represented. This is not the case in relation to gambling, despite many key reforms currently under consideration.

Some organisations in our sector may put in comments in this or other IGA processes and we welcome their work in providing this information and input. However, we remain concerned that the voices of many organisations in our sector,

particularly smaller service providers and consumer groups, will not be heard because of lack of resourcing.

SACOSS notes the recent passage through parliament of the *Statutes Amendment (Gambling Reform) Bill 2013* which includes provisions for sector advocacy on gambling issues. This is a welcome move, but at present it is unclear how that will work or where the advocacy role will sit, and in meantime SACOSS has no resources to provide comment in relation to the documents currently out for consultation.

We remain open to talking about options for resourcing gambling consumer advocacy.

Yours,

A handwritten signature in black ink, appearing to read 'RWomersley', written in a cursive style.

Ross Womersley  
Executive Director, SACOSS