



Comment

to the Stage Two Consultation on the Race and Sports Bookmaking Act 2001

**September
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INTRODUCTION

ACTCOSS acknowledges that modern day Canberra has been built on the traditional lands of the Ngunnawal people. We pay our respects to their elders and recognise the displacement and disadvantage they have suffered since European settlement. ACTCOSS celebrates the Ngunnawal's living culture and valuable contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) is the peak representative body for not-for-profit community organisations, people living with disadvantage, and low-income citizens of the Territory. ACTCOSS is a member of the nationwide COSS network, made up of each of the state Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS's objectives are representation of people living with disadvantage, the promotion of equitable social policy, and the development of a professional, cohesive and effective community sector.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS receives funding from the Community Services Program (CSP) which is funded by the ACT Government.

THE PRINCIPLE OF HARM MINIMISATION.

ACTCOSS is very pleased that the issue of harm minimisation has been uppermost in the Gambling and Racing Commission's (GRC) review of the Racing and Sports Bookmaking Act 2001. It is also gratifying that the GRC, as regulator, is happy to reinforce that role by retaining the power to examine and sanction sports bookmaking events on their merit.

ACTCOSS hopes that this capacity will be used to ensure that events that are inappropriate for sports bookmaking wagers will continue to be protected. For example, ACTCOSS believes that it would be entirely inappropriate to allow betting on the outcome of schoolboy rugby or cricket.

Our major concern in the proposed changes to the legislation is the move to allow sports bookmakers to operate from commercial premises. While the discussion of the proposed change makes the point that operators should not be allowed to establish retail or "front of house" operations. It seems unclear from the proposed amendments, outlined at page 10 of the discussion paper, whether there would be any prohibition from agencies establishing street frontages and promoting their business in a way that is inconsistent with the concept of "back-of-house, e-commerce operations offering telephone and Internet sports bookmaking products". (Discussion Paper page 8)

Would the GRC, for example, restrict sports bookmaking businesses that are not engaged in race betting to non-street frontages in Civic and town centres? Or would there be a direction that they must occupy premises in industrial areas, as is the case for legal prostitution? Is there any capacity for the GRC to restrict the signage that could be displayed if, for example, a sports bookmaking business took up office space in City Walk, displaying its internet address and phone number, and possibly having an electronic sign that displayed odds and events on which it was accepting bets?

ACTCOSS hopes that these issues will be discussed widely, with particular emphasis on harm minimisation before the final amendments are made.