

The Department of Justice and Attorney-General

15 September, 2023

To whom it may concern,

Re: Proposed amendments to the Casino Control Act 1982 arising from the External Review of The Star Entertainment Group Limited, and other proposals to enhance casino integrity

The Ethnic Communities Council of Queensland (ECCQ) as the peak body representing culturally and linguistically diverse (CALD) communities in Queensland, base our responses to the 'Proposed amendments to the Casino Control Act 1982' consultation paper on our belief that Australia's systems should allow for every Australian, irrespective of their background, to be able to participate and contribute to all aspects of Australian society and be treated fairly. We know that the diversity of our multicultural society is one of Australia's greatest strengths.

ECCQ acknowledge that although less CALD communities engage in gambling activities within casinos, those who do are at a greater risk of development problems with their gambling and that targeted culturally-appropriate responses are needed¹. This is due to the stigma and shame that gambling has in many CALD communities. Additionally, the stress of migration and the ease of access to gambling in Australia puts CALD community members at additional risk of suffering gambling harm and gambling related harm².

¹ Relationships Australia Queensland (2022) Attitudes to Gambling in Difference Cultures. <https://www.raq.org.au/blog/attitudes-gambling-different-cultures>

² Australian Institute of Family Studies (2016) Gambling in culturally and linguistically diverse communities in Australia. <https://aifs.gov.au/research/research-snapshots/gambling-culturally-and-linguistically-diverse-communities-australia>



Office Address

NICK XYNIAS House, 253 Boundary Street
West End, Queensland 4101
(corner of Granville St)

Postal Address

PO Box 5916, West End,
Queensland 4101

Phone

(07) 3844 9166

Fax

(07) 3846 4453

Email


administration@eccq.com.au

Website

www.eccq.com.au

ECCQ are writing to draw your attention to a number of considerations to be made regarding the recommendations made in the consultation paper:

- Firstly, people from countries where there has historically been misuse of information kept by authorities may be deterred by the collection of information via the proposed mandatory carded play proposed. This is particularly the case for people who are residing in Australia on a temporary visa. If information collated via player cards by casinos was to be shared with commonwealth agencies, this would likely increase some individuals' distrust in institutions and they would be concerned regarding tracking and information sharing. ECCQ recommends that information be limited at the level of casinos and not shared with commonwealth agencies. Due to the concern of many CALD people about security and privacy, education on how the information will be handled and controlled between casinos and external agencies should be made available in multiple languages and shared via community groups.
- Secondly, ECCQ recommends that the daily amount for cash-only gambling should be reduced to \$500 per day, rather than \$1,000 as proposed. For those living on a low income, a daily limited of \$1,000 per day able to be spent in cash sets an expectation and sends a wrong message. This may have negative impacts on not only individuals on a low income, but also their families.
- Thirdly, for all of the changes that are to occur as proposed by the Department, ECCQ recommends that an education and awareness campaign of all changes be implemented. This education campaign should target consumers from various multicultural communities who regularly engage with casinos. This education should take into account the languages spoken by these communities and their preferred mode and channels of communication. This education should incorporate more clarity around what the term "safe gambling" means. Community groups are best positioned to deliver culturally appropriate education and assistance to CALD gamblers and to



Office Address
NICK XYNIAS House, 253 Boundary Street
West End, Queensland 4101
(corner of Granville St)

Postal Address
PO Box 5916, West End,
Queensland 4101

Phone
(07) 3844 9166

Fax
(07) 3846 4453

Email
administration@eccq.com.au

Website
www.eccq.com.au

advise of how the changes will impact on individual's experiences³. In addition, information should be shared upon entry to the casino in multiple languages.

- Finally, ECCQ recommends that all staff working in the Department, in casinos and those engaging with these organisations, including inspectors, should be required to complete mandatory culturally responsive practice training. Cultural diversity and multicultural awareness will strengthen casinos and those working with them⁴. This training should be delivered including information about unconscious bias and should be delivered by a team of trainers from culturally diverse backgrounds. Whilst there is a need for an increase in translated materials, this is no longer enough.

Thank you for engaging us in your consultation process. Please do not hesitate to contact me at: advocacy@eccq.com.au with any questions regarding this response.

Yours Sincerely,



Lisa Ward,
Chief Executive Officer,
Ethnic Communities Council of Queensland

³ Rowlatt, V., Wraith, D., Doan, T.-V. M., & Malatzky, C. (2023). Culturally and Linguistically Diverse Gamblers of East Asian Descent in Australia: A Comprehensive Review of Current Evidence. *Journal of Gambling Studies*, 39(2), 947–969. <https://doi.org/10.1007/s10899-023-10202-5>

⁴ Bomer, A. E. (2013). *The bet on culture: Cultural diversity and multiculturalism in the casino industry*. ProQuest Dissertations Publishing.



Office Address

NICK XYNIAS House, 253 Boundary Street
West End, Queensland 4101
(corner of Granville St)

Postal Address

PO Box 5916, West End,
Queensland 4101

Phone

(07) 3844 9166

Fax

(07) 3846 4453

Email

administration@eccq.com.au

Website

www.eccq.com.au