Wesley Mission's NSW Gambling Reform Platform 2026–27

Background paper

October 2026

PUT POKIES IN THEIR PLACE

wesley mission
driven to do more good

Executive Summary

Wesley Mission launched the Put Pokies In Their Place campaign in 2022 to build public and political support for evidence-based poker-machine reform in NSW. The campaign brought together Wesley Mission's experience supporting people and families affected by gambling harm with a broader call for government action to prevent harm before it occurs.

Since the campaign began, 55 organisations **have joined Put Pokies In Their Place**. Campaign partners represent faith communities, health and social services, local government, research, multicultural communities and people with lived and living experience of gambling harm. This diverse coalition demonstrates the breadth of community support for stronger gambling reform in NSW.

During this time, we have seen important progress, including improved publication of poker-machine loss data by local government area, which Wesley Mission now analyses quarterly, and new Government commitments on exclusion, marketing and machine entitlements. Our CEO Rev Stu Cameron was on the NSW government's Independent Panel on Gaming reform, examining a range of harm minimisation and gaming reform opportunities. Wesley Mission has also increased engagement with the NSW Department of Liquor and Gaming as well as the NSW Independent Liquor & Gaming Authority. However, significant gaps remain. This refreshed platform recognises the progress made while setting out the comprehensive, enforceable reforms still needed to prevent gambling harm and strengthen community accountability.

Poker machines remain a major source of gambling losses and harm in New South Wales. NSW recorded $4.75 billion in poker-machine losses in the first six months of 2026, including $2.38 billion in the June quarter. Losses remained above $1 million an hour for the eighth consecutive quarter, and are growing at almost twice the rate of inflation. These losses are concentrated in low-socioeconomic and marginalised communities, and occur alongside financial pressure on households and growing demand for social support. [1]

The NSW Government's August 2026 Gaming Reform Package is an important opening. It commits to a statewide exclusion register, a third-party exclusion scheme, mandatory facial recognition technology at gaming-room entrances, faster entitlement forfeiture, marketing restrictions, stronger regulation, additional harm-minimisation funding and infrastructure capable of supporting account-based gambling. However, the package leaves account-based gambling voluntary at venue discretion and commits to review shutdown periods rather than immediately legislating a midnight to 10am shutdown.[2]

The evidence supports a stronger, population-level response. NSW-commissioned research found that people experiencing gambling problems are more likely to use poker machines after midnight, gamble for longer and seek another venue when a shutdown occurs. Research on pre-commitment finds that universal, binding systems offer stronger protection than partial or voluntary systems. Self-exclusion can help some people but is constrained by low uptake, incomplete coverage, complex registration and weak enforcement.[3]

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[1] Wesley Mission. NSW Poker Machine Loss Data Analysis Q1 2026. Sydney: Wesley Mission, June 2026. https://www.wesleymission.org.au/hubfs/About-us/202606%20NSW%20Poker%20Machine%20Loss%20Data%20Analysis%20Q1%202026.pdf.; Liquor & Gaming NSW. "Quarterly Gaming Reports." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machine-data-reports/quarterly-gaming-reports.

[2] Liquor & Gaming NSW. "NSW Government Gaming Reform Package." August 25, 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-reform-package/nsw-government-gaming-reform-package ; New South Wales Government. "Gaming Reform Package: Overview of Reforms." August 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-reform-package.

[3] Smith, C., A. Wolstenholme, and C. Duffy. Shutdown Periods for Electronic Gaming Machines. Sydney: NSW Responsible Gambling Fund, 2019. https://www.gambleaware.nsw.gov.au/resources-and-education/check-out-our-research/published-research/shutdown-periods-for-electronic-gaming-machines; Liquor & Gaming NSW. "Gaming Machine Shutdown Periods." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/shutdown-periods.; Liquor & Gaming

Wesley Mission's refreshed platform therefore calls for seven connected reforms:

- A uniform midnight to10am shutdown for poker-machines
- Universal mandatory account-based gambling with built-in robust harm prevention measures.
- An independently governed and enforceable statewide exclusion register.
- Statutory rights for councils and communities in poker-machine decisions.
- Venue-level data transparency and recurring social-impact measurement.
- A legislated community return from poker-machine taxation revenue.
- A measurable, harm-based reduction in poker-machine numbers.

The test of reform is not the number of announcements made. It is whether losses fall, fewer people experience harm, communities have greater control and public systems are accountable for outcomes.

This Welsey Mission NSW Gambling Reform Campaign Platform Refresh acknowledges that whilst there is genuine progress with the government now willing to engage on reform, there is significant room for expanding and improving the current reform package.

NSW. Review of Gaming Machine Shutdown Hours Framework. Sydney: Liquor & Gaming NSW, 2025. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/review-shutdown-hours. ; Rintoul, A., and A. Thomas. Pre-Commitment Systems for Electronic Gambling Machines: Preventing Harm and Improving Consumer Protection. Melbourne: Australian Gambling Research Centre, 2017. https://aifs.gov.au/resources/policy-and-practice-papers/pre-commitment-systems-electronic-gambling-machines. ; Bijker, R., et al. "International Prevalence of Self-Exclusion from Gambling: A Systematic Review and Meta-Analysis." Current Addiction Reports (2023). https://doi.org/10.1007/s40429-023-00510-6 .; Devault-Tousignant, C., et al. "Qualitative Experience of Self-Exclusion Programs: A Scoping Review." International Journal of Environmental Research and Public Health 20, no. 5 (2023): 3987. https://pmc.ncbi.nlm.nih.gov/articles/PMC10001959/.

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1. Gambling Harm and the NSW Context

1.1. A public-health approach

Gambling harm includes negative consequences affecting the wellbeing of a person who gambles, affected family and friends, workplaces, services and communities. It extends beyond a clinical category and can include financial deprivation, debt, housing insecurity, relationship conflict, psychological distress, reduced work or study performance, crime and pressure on health, legal and social services. A public-health approach examines the product, environment and regulatory system, not only individual behaviour.[4]

Poker machines are a high-intensity, continuous form of gambling. Rapid betting cycles, randomised rewards, near misses, losses disguised as wins, immersive audio-visual features and ease of access can contribute to prolonged use and impaired awareness of time and money spent. Australian research identifies electronic gambling machines as the most harmful gambling product available domestically.[5]

1.2. Scale and concentration

According to the NSW Quarterly Gaming Machine Reports as of Q2 2026 there are 88,039 active poker machines across 2,110 clubs and hotels. Official reporting provides quarterly local government area data and venue rankings but suppresses separate LGA figures where four or fewer venues operate. [6]

In the first half of 2026, NSW residents lost $4.75 billion on poker machines. Fairfield, Canterbury-Bankstown and Cumberland recorded the highest metropolitan losses, while the Central Coast, Wollongong and Newcastle were among the highest-loss regional areas. The concentration of losses matters because the NSW Auditor-General found that gaming-machine losses and the social costs of harm remain disproportionately concentrated in socio-economically disadvantaged communities.[7]

1.3. Regulation is not yet achieving harm-minimisation outcomes

The 2025 NSW Auditor-General's performance audit concluded that the NSW Department of Liquor and Gaming and the Independent Liquor & Gaming Authority regulate gaming machines in a structured and consistent way but are not effectively supporting harm-minimisation outcomes. The audit found insufficient focus on high-risk areas, no targets for reducing gaming-machine harm,

[4] Livingstone, Charles. How Electronic Gambling Machines Work. Australian Gambling Research Centre Discussion Paper No. 8. Melbourne: Australian Institute of Family Studies, 2017. https://aifs.gov.au/resources/policy-and-practice-papers/how-electronic-gambling-machines-work.; Browne, M., et al. Social Costs of Gambling to Victoria 2023. Melbourne: Victorian Department of Justice and Community Safety, June 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Victorian Department of Justice and Community Safety. Social Costs of Gambling to Victoria 2023: Summary and Factsheets. Melbourne: Victorian Government, 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.

[5] Browne, M., et al. "Unambiguous Evidence That Over Half of Gambling Problems in Australia Are Caused by Electronic Gambling Machines." Journal of Behavioral Addictions 12, no. 1 (2023): 182-193. https://pubmed.ncbi.nlm.nih.gov/36729109/.; Australian Institute of Family Studies. "Understanding Gambling Harm and Ways to Identify Those at Risk." Accessed September 2026. https://aifs.gov.au/resources/short-articles/understanding-gambling-harm-and-ways-identify-those-risk.

[6] Liquor & Gaming NSW. "Quarterly Gaming Reports." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machine-data-reports/quarterly-gaming-reports.

[7] Wesley Mission. NSW Poker Machine Loss Data Analysis Q1 2026. Sydney: Wesley Mission, June 2026. https://www.wesleymission.org.au/hubfs/About-us/202606%20NSW%20Poker%20Machine%20Loss%20Data%20Analysis%20Q1%202026.pdf.; Audit Office of New South Wales. Regulation of Gaming Machines. Sydney: Audit Office of New South Wales, June 12, 2025. https://www.audit.nsw.gov.au/our-work/reports/regulation-of-gaming-machines.

limited proactive review of licence conditions and weaknesses in ensuring the forfeiture scheme achieves its legislative objectives. [8]

1.4. Community Attitudes Survey Findings

In September 2026, Wesley Mission commissioned The Insight Centre to survey community attitudes to gambling and gambling reform in NSW. The representative online survey included 700 NSW adults and was conducted from 7 to 15 September 2026. The sample was weighted by age, gender, region and education to align with the NSW adult population. The effective sample size was 684, providing a margin of error of ±3.7 percentage points at the 95% confidence level.

The findings demonstrate that gambling harm is widely recognised as a serious community issue. Fifty-eight per cent of NSW adults rated gambling as an extremely or very serious issue for the state, placing it ahead of concerns including alcohol addiction and unemployment. More than two in five adults, 42%, knew a colleague, family member or friend who had experienced gambling harm. This included 38% who knew someone harmed by poker machines and 25% who knew someone harmed by sports or online gambling.

The research found strong support for gambling reforms, including for an independently run statewide exclusion register at 78%, publishing venue-level poker-machine losses at 76%, and switching off poker machines between midnight and 10am at 72%. When respondents were asked to prioritise a broader set of reforms, the midnight to 10am shutdown and statewide exclusion register ranked highest.

Local information also strengthened support for transparency. When respondents were shown poker-machine losses in their area, support for publishing venue-level losses increased from 73% to 79%. Almost two-thirds said local losses were higher than they had expected. This reinforces the importance of accessible venue-level data and Wesley Mission's quarterly analysis of losses.

The findings point to a significant trust and accountability gap. Half of respondents believed the gambling lobby had too much influence on NSW politics, while only 16% trusted the Government to stand up to the gambling industry. Almost half believed the Government should have done more on gambling reform before the March 2027 NSW election.

The community also showed greater support for effective exclusion than for increased surveillance. While 78% supported an independently run statewide exclusion register, support fell to 61% when facial recognition technology was included, while opposition rose substantially. This suggests facial recognition should be treated as a limited compliance tool, not as a substitute for stronger and more comprehensive safeguards.

[8] Audit Office of New South Wales. Regulation of Gaming Machines. Sydney: Audit Office of New South Wales, June 12, 2025. https://www.audit.nsw.gov.au/our-work/reports/regulation-of-gaming-machines.; Audit Office of New South Wales. "Report Snapshot: Regulation of Gaming Machines." June 12, 2025. https://www.audit.nsw.gov.au/media-release/report-snapshot-regulation-of-gaming-machines.

Overall, the research provides a clear mandate for the refreshed platform. NSW adults support practical reform, greater transparency and strong exclusion protections, but remain concerned about industry influence, government accountability and unnecessary surveillance. The findings strengthen the case for reforms that are independent, evidence-based, privacy-protective and publicly accountable. [9]

[9] The Insight Centre. NSW Community Attitudes to Poker Machines and Gambling Reform: Research Report. Prepared for Wesley Mission. September 2026.

2. 2026-2027 NSW Platform Refresh Goals

2.1. Reduced operating hours

WESLEY MISSION CALL

Wesley Mission calls for a legislated uniform shutdown for poker-machines in NSW pubs and clubs between midnight and 10am, seven days a week, with no routine exemptions.

2.1.1. Current Situation

NSW law requires poker machines to be shut down between 4am and 10am each day. In December 2025, the NSW Government announced that longstanding variations applying to more than 670 venues would be repealed from 31 March 2026, while retaining a pathway for venues to seek exemptions under revised guidelines. This is an important step towards greater consistency, but it does not address the central harm-minimisation question: whether poker machines should remain available between midnight and 4am, when the prevalence and severity of gambling risk increase. The present framework allows a person gambling late at night to continue through the period when fatigue, isolation, alcohol use and impaired decision-making may compound risk. The Government announced a review within the 2026 Gaming Reform Package, however as of the announcement, there has been no timeline committed to for this review.[10] The evidence is clear, and legislation needs to be implemented as a matter of urgency – increasing shutdown hours from midnight until 4am is a clear harm reduction method.

A midnight shutdown is a population-level availability measure. It creates a circuit breaker during these critical hours when fatigue, isolation and alcohol may compound risk. It does not depend on a person identifying their own risk, requesting help or being recognised by venue staff.

The principal implementation risk is displacement. The immediate risk of moving between legal venues is reduced by a uniform statewide rule. Any movement to online or illegal gambling should be measured through baseline and follow-up evaluation, rather than assumed to occur or to outweigh the present harm of poker machines.

2.1.2. Evidence on late-night gambling harm

Research commissioned by the NSW Responsible Gambling Fund found that people experiencing gambling harm were significantly more likely than recreational gamblers to use poker machines after midnight, gamble for longer and encounter the shutdown period. The research identified two broad late-night patterns: social gambling, often associated with alcohol and concentrated on weekends, and solitary gambling focused on continued play, chasing losses or beliefs about a particular machine. The latter pattern was more strongly associated with moderate-risk and gambling harm.[11]

[10] Liquor & Gaming NSW. "Gaming Machine Shutdown Periods." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/shutdown-periods.; Liquor & Gaming NSW. Review of Gaming Machine Shutdown Hours Framework. Sydney: Liquor & Gaming NSW, 2025. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/review-shutdown-hours.

[11] Smith, C., A. Wolstenholme, and C. Duffy. Shutdown Periods for Electronic Gaming Machines. Sydney: NSW Responsible Gambling Fund, 2019. https://www.gambleaware.nsw.gov.au/resources-and-education/check-out-our-research/published-research/shutdown-periods-for-electronic-gaming-machines; Liquor & Gaming NSW. "Gaming Machine Shutdown Periods." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/shutdown-periods.; Stevens, M., and Roy Morgan Research. Impact of Electronic Gaming Machine (EGM) Late Night Play on EGM Player Behaviours. Commissioned by the NSW Responsible Gambling Fund, 2023.

The evidence also supports uniformity across venues. Some higher-risk participants in the NSW study said they would seek another venue when confronted with a closure. That finding reinforces the need for a consistent shutdown period across venues. If all pub and club poker-machine rooms close at midnight, immediate migration within the regulated venue market becomes materially more difficult. [12]

Australian evidence from the COVID-19 venue shutdown provides broader support for availability controls. Overall gambling frequency fell when venue-based gambling was unavailable, with research indicating that people who were experiencing gambling harm at the hands of poker machines generally did not 'mode switch' to alternative modes of gambling. Research reinforces the established public-health principle that accessibility and availability influence gambling participation and harm.[13]

2.1.3. What reform should deliver

- Legislation to shut down poker machines in NSW pubs and clubs from midnight until 4am, extending the current mandatory shutdown period. Legislation should include a fixed commencement date, rather than an open-ended review.
- A public register of all existing venues granted exemptions to shutdown hours.
- An annual review of all existing exemptions to shutdown hours.
- Hourly player and loss analysis by venue type and geography.
- Independent evaluation of losses, session duration, venue switching, online migration, help-seeking and compliance.
- Publication of the review terms, submissions, evidence and Government response before the March 2027 election.

2.1.4. Lived-experience spotlight: Harm hidden in the late-night hours

One older person with lived experience of poker-machine harm lost their savings and sold two homes over many years of gambling.

They believe people experiencing harm are too often blamed for their losses, while insufficient attention is paid to the design and availability of poker machines. Having worked hard to rebuild their life, they now advocate for practical reforms that protect others.

They believe a uniform overnight shutdown could provide a vital circuit breaker when people may be most vulnerable and least able to stop.

"I have continued to do the hard work to rebuild my life. What is harder to accept is that individuals are expected to change while the system remains the same."

This account has been anonymised and lightly edited for clarity. It reflects one person's experience of poker-machine harm.

[12] Smith, C., A. Wolstenholme, and C. Duffy. Shutdown Periods for Electronic Gaming Machines. Sydney: NSW Responsible Gambling Fund, 2019. https://www.gambleaware.nsw.gov.au/resources-and-education/check-out-our-research/published-research/shutdown-periods-for-electronic-gaming-machines; Liquor & Gaming NSW. "Gaming Machine Shutdown Periods." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/shutdown-periods.; Stevens, M., and Roy Morgan Research. Impact of Electronic Gaming Machine (EGM) Late Night Play on EGM Player Behaviours. Commissioned by the NSW Responsible Gambling Fund, 2023.
[13] Gainsbury, Sally M., et al. "Impacts of the COVID-19 Shutdown on Gambling Patterns in Australia." Journal of Addiction Medicine 15 (2021): 468-476.

2.2. Mandatory Account-Based Gambling

WESLEY MISSION CALL

Require universal, mandatory, identity-linked access to poker machines through an independently governed account-based system with binding harm-reduction safeguards, and a fixed commencement date for the full transition to a two-way communications protocol

2.2.1. Current situation

In NSW a customer can upload $500 in cash into a poker machine in one go, however this only applies to machines purchased after July 2023, with many older machines allowing up to $10,000 to be uploaded in one go.[14] They can then bet. At any point they can end their session and get a ticket showing how much the cashiers should pay them. The ticket does not distinguish between winnings and unused funds and can be paid out either in cash or cheque. Under NSW laws, regardless of where the money came from, it becomes lawful gambling. If the source of the money used to gamble was sourced from illegal activity, the money is effectively laundered. [15]

While concerns around money laundering have been a major driver of reform discussions, the current system also provides limited opportunities to prevent gambling harm before it occurs. Poker machines are designed to encourage prolonged play through features such as rapid betting cycles, continuous reinforcement and immersive environments, which can impair judgement and reduce a player's awareness of the time and money being spent.[16]

Existing harm minimisation measures are largely reactive and depend upon either venue staff identifying problematic behaviour or individuals recognising harm and seeking support themselves. Statements of activity are available but must be requested and are venue specific reducing ability to track spending across multiple venues. Similarly, self-exclusion schemes, support services and venue incident reporting mechanisms generally come into effect after harm has already occurred.[17]

Cash based gambling also provides few points for self-monitoring or reality checks. One of the few interruptions is if a person loses all their money and has to go to the ATM to get more cash – and we know that the industry fought and won the right in NSW to have cash dispensers as close as possible to the gambling room, so that people "in the zone" had the shortest break in play possible.

2.2.2. An account-based model

Under an account-based model, individuals access gambling machines using a centralised gambling account or "gaming wallet" that is consistent across venues. Rather than inserting cash directly into machines, funds from a bank account are deposited into and withdrawn from the account, creating a record of gambling activity and enabling harm minimisation measures to be applied consistently across a person's gambling activity. From a regulatory perspective, mandatory accounts require identity and age verification, reducing the likelihood of underage gambling and limiting opportunities for anonymous money laundering.

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[14] NSW Government, "Reforming Gaming in NSW Pubs and Clubs," accessed October 8, 2026, https://www.nsw.gov.au/nsw-government/reforming-gaming-nsw-pubs-and-clubs.

[15] [Reference 35 not present in bibliography]; New South Wales Government. "Minns Government Lowers Poker Machine Entitlements in NSW, Reduces Cash Feed-In Limit on New Machines." Ministerial media release, June 23, 2023. https://www.nsw.gov.au/ministerial-releases/poker-machine-limit-lowered.

[16] NSW Responsible Gambling Fund. Literature Review of Gaming Machine Characteristics. Sydney: NSW Responsible Gambling Fund, 2020. https://www.gambleaware.nsw.gov.au/-/media/files/literature-review-of-gaming-machine-characteristics-edited-20-1-2020.ashx.

[17] Saulwick, J. "Clubs Not Interested in $6000 Fix to Help Problem Gamblers." Sydney Morning Herald, April 20, 2018. https://www.smh.com.au/national/nsw/clubs-not-interested-in-6000-fix-to-help-problem-gamblers-20180420-p4zass.html.

Concerns arise that digital payment methods may increase time and expenditure spent gambling. It would be recklessly negligent of the government to approve an account-based payment system for poker machine and casino gambling in NSW that merely introduced frictionless payment ("tap and go"), as this would likely increase losses and harm to customers, while speeding up the profit taking by venues. [18] To address this risk, any account-based gambling system should be introduced with mandatory, evidence-based and robust harm minimisation measures built in.

Importantly, voluntary uptake alone is unlikely to achieve meaningful harm reduction. People at greatest risk of gambling harm are often the least likely to engage with voluntary safeguards. While voluntary tools may assist some individuals, evidence suggests they are insufficient to significantly reduce gambling harm across the broader population. The NSW Government has committed to transition poker machines from a one-way to a two-way communications protocol, and to upgrade the Centralised Monitoring System to support an account-based model. This may help create the infrastructure needed for account-based gambling, but enabling an account-based model is not the same as requiring a mandatory statewide system. For this reason, any account-based gambling system introduced in New South Wales should be mandatory rather than voluntary, committing to an effective implementation timeframe.

2.2.3. Current models and implementations

The Independent Panel on Gaming Reform's *Roadmap for Gaming Reform* recommended that the NSW Government introduce a mandatory statewide account-based gaming system, phased with voluntary adoption until a centralised system is operational, estimated by 2028. [19] A key finding of the 2024 digital gaming wallet trial was that patrons were reluctant to engage with the technology when it was not mandatory, reflected in very low adoption. [20] The Panel also found that a voluntary system would not address money laundering and could increase that risk by making laundering easier. The evaluation itself noted that the small number of active users meant it could not draw statistically robust conclusions about the technology's impact on individual behaviour — which is itself the central finding. Voluntary systems do not reach the people who most need them.

Account-based gambling systems are already operating or being expanded in several jurisdictions. Victoria's YourPlay pre-commitment system has been available on all gaming machines since December 2015, but remains voluntary for players in hotels and clubs. Victoria legislated a framework for mandatory carded play in May 2025, although the implementation trial has been postponed. Victoria has, however, required carded play linked to identity, with time and loss limits set, at the Melbourne casino since December 2023. [21] In the Crown Casino more than 500,000 people have signed up for the YourPlay scheme.[22] The Victorian experience illustrates both the direction of travel and the risk that mandatory systems are legislated but not delivered. NSW should legislate a commencement date, not simply a framework.

The ACT is following this direction. The recently proposed Gaming Machine (Harm Prevention and Reduction) Amendment Bill 2026 does much to reduce gambling related harms. It introduces a framework through which a mandatory account-based cashless gaming will be applied to poker

[18] Gainsbury, Sally M., and Alex Blaszczynski. "Digital Gambling Payment Methods: Harm Minimisation Policy Considerations." Gambling Law Review. https://journals.sagepub.com/doi/abs/10.1089/glr2.2020.0015.
[19] Independent Panel on Gaming Reform. Roadmap for Gaming Reform. Volume 1. Sydney: New South Wales Government, 2025. https://www.nsw.gov.au/sites/default/files/noindex/2025-08/roadmap-for-gaming-reform-volume-1.pdf.
[20] New South Wales Government. Evaluation of the NSW Digital Gaming Wallet Trial 2024. Volume 3. Sydney: NSW Government, 2025. https://www.nsw.gov.au/sites/default/files/noindex/2025-08/evaluation-of-the-nsw-digital-gaming-wallet-trial-2024-volume-3.pdf.
[21] Victorian Gambling and Casino Control Commission. "YourPlay." Accessed October 2, 2026. https://www.vgccc.vic.gov.au/for-gambling-providers/venue-operators-and-poker-machines/venue-operator-obligations/legislative-and-regulatory-requirements/yourplay.
[22] Richard Willingham, "Mandated Play Cards for All Victorian Poker Machines to Be Debated in State Parliament amid Calls to Fast-Track Trial," *ABC News*, March 18, 2025, updated March 19, 2025, https://www.abc.net.au/news/2025-03-19/victorian-poker-machine-reform-mandated-play-card/105066582.

machines including the requirement to apply for a player account card through which players load funds to gamble, set loss limits and track spending across venues.

Internationally, Norway operates one of the most comprehensive account-based gambling systems. All government-operated gaming machines require player identification through a central account linked to a range of mandatory harm reduction measures.[23] Evaluations have found reductions in harmful gambling behaviours among high-risk gamblers, including reduced loss-chasing behaviour, without evidence of substantial migration to alternative gambling products. Similar effects occurred in Finland with the introduction of centralised, mandatory account-based requirement on poker machines, with a decline in poker machine expenditure not offset by increased expenditure on other gambling products. [24]

2.2.4. Comparing account-based play and Facial Recognition Technology

Some jurisdictions have explored Facial Recognition Technology (FRT). While FRT may have a role in assisting venue-based compliance measures, it should not be viewed as an alternative to account-based gambling systems. Unlike account-based play, FRT cannot support broader harm reduction measures such as spending limits, time limits, activity statements or pre-commitment tools. FRT systems also rely on accurate image capture and matching, creating the potential for identification errors that may undermine effectiveness and generate frustration for patrons. In addition, FRT still require human intervention to stop person who has self-excluded from entering the venue which is a significant weakness. Digital payments and ID-based account systems are already familiar to most Australians, making them a more familiar and potentially less intrusive mechanism for implementation. FRT also raises additional concerns relating to accuracy, potential bias, and the storage of biometric information. As a result, Wesley Mission considers mandatory account-based gambling to be the more comprehensive, effective and proportionate platform through which gambling harm minimisation measures should be delivered.[25]

2.2.5. Harm minimisation measures

A primary benefit of a centralised, account-based gambling system is that it enables harm minimisation measures to be applied consistently across venues while also supporting anti-money laundering objectives. Unlike venue-specific systems, a centralised account provides a complete picture of gambling activity, making it possible to implement safeguards that are effective regardless of where an individual chooses to gamble.

A key feature of an account-based system is pre-commitment. Pre-commitment allows individuals to set limits on their gambling expenditure before play begins, helping to prevent impulsive decisions and excessive losses. Evidence indicates that mandatory pre-commitment is among the most effective gambling harm reduction measures available, particularly for individuals experiencing or at risk of gambling harm. Current recommendations suggest money loss limits of $100 a day, $500 a week and $5,000 a year; an amount that low-risk and non-problem gamblers do not hit but ensures caps are effective.[26] Any increase to higher spending thresholds should be

[23] Marionneau, Virve, Sally M. Gainsbury, and Michael Auer. "The Value of Voluntary vs. Mandatory Responsible Gambling Limit-Setting Systems: A Review of the Evidence." International Gambling Studies 21, no. 2 (2021): 255-271. https://doi.org/10.1080/14459795.2020.1853196.
[24] Selin, Jani, Virve Marionneau, Antti Impinen, and Tomi Roukka. "The Implementation of Mandatory Identification in Land-Based Electronic Gambling Machines: Impacts on and Uptake by Different Player Groups." Behavioural Public Policy (2025).
[25] Tasmanian Liquor and Gaming Commission. Investigation of Harm Minimisation Technologies: Report to the Treasurer. Hobart: Tasmanian Liquor and Gaming Commission. https://www.treasury.tas.gov.au/Documents/TLGC%20Report%20to%20Treasurer%20-%20Investigation%20of%20harm%20minimisation%20technologies.PDF.
[26] Deloitte Access Economics. Social and Economic Impact of Electronic Gaming Machine (EGM) Reform Use in Tasmania. Hobart: Deloitte Access Economics, 2025. https://megwebb.com.au/wp-content/uploads/2026/02/Deloitte_Electronic-Gaming-Machine-use-in-Tasmania_Dec-2025.pdf.

subject to additional safeguards, including verification of available funds and appropriate checks to ensure money is not derived from illegal sources.

Account-based systems also create opportunities for additional harm minimisation measures without significantly affecting recreational gamblers. These may include reasonable time limits, mandatory breaks in play, restrictions on immediate access to additional funds following significant losses, and the provision of activity statements that allow individuals to review their gambling behaviour across venues on-demand. Such measures provide opportunities for reflection and informed decision-making, helping people recognise potentially harmful gambling patterns before significant harm occurs.

The system could also support practical consumer protections, such as preventing gambling accounts from being funded through credit cards, providing easy access to gambling support services, and offering personalised safety features for individuals seeking greater control over their gambling activity. [27]

Importantly, account-based systems can be integrated directly with self-exclusion and exclusion registers. Where an individual has voluntarily self-excluded, or is subject to an exclusion order, gambling access can be automatically restricted across participating venues. This reduces reliance on surveillance-based approaches and provides a more reliable and consistent mechanism for enforcing exclusions.

2.2.6. Lived-experience spotlight: When desperation takes hold

One parent recalls feeding their family's last $20 into a poker machine after gambling for eight hours, desperately trying to recover what they had lost.

They began using poker machines at 18 and accumulated approximately $500,000 in debt over the following 12 years.

"I had the best of intentions when I went in, but once I started losing money, desperation took hold," they said. "It became: 'How can I fix this?'"

Recovery was gradual and supported by counselling. They have since rebuilt their relationships, developed a healthier relationship with money and begun using their experience to advocate for reforms that protect others.

This account has been anonymised and lightly edited for clarity. It reflects one person's experience of poker-machine harm.

This experience demonstrates why safeguards cannot depend solely on decisions made while someone is gambling and trying to recover losses. Mandatory account-based gambling could introduce binding loss limits, time limits, activity statements and breaks before a session escalates.

[27] Rintoul, A., and A. Thomas. Pre-Commitment Systems for Electronic Gambling Machines. Melbourne: Australian Gambling Research Centre, 2017. https://aifs.gov.au/resources/policy-and-practice-papers/pre-commitment-systems-electronic-gambling-machines.

2.3. Statewide exclusion register

WESLEY MISSION CALL

Build a single statewide register covering every pub and club with poker machines, independently governed, simple to access, actively enforced and connects individuals experiencing harm or those making third part referrals to practical support.

2.3.1. Current situation

The existing NSW approach is fragmented across venues and schemes. A person may need to identify multiple venues, navigate different processes and depend on venue staff recognising them from photographs or sign-in systems. Fragmentation is especially problematic where a person uses multiple venues, moves between communities, or attempts to breach their exclusion during a period of acute risk. The design can transfer responsibility back to the person seeking protection while leaving enforcement inconsistent.[28] [29] [30]

The August 2026 package commits to a statewide register expected to commence in 2028, together with third-party exclusions and mandatory Facial Recognition Technology (FRT) at gaming-room entrances. A voluntary NSW code of practice has applied to venues using facial recognition since March 2026. Whilst this is a good first step, cautions must be in place regarding FRT and the register must be implemented in a manner that is independent, accessible, safe and effective. [31]

2.3.2. What self-exclusion can and cannot achieve

Self-exclusion works for the people who use it. Research commissioned by the Australian Communications and Media Authority into BetStop, the National Self-Exclusion Register, found that 96 per cent of registrants had stopped or reduced their wagering, 79 per cent reported improved mental health, 77 per cent reported a better overall quality of life, and 69 per cent reported improved personal relationships, including with family members and partners. [32]Uptake has also been substantial: 44,841 people had registered by 30 June 2025, including 13,998 from New South Wales, more registrations than from any other state. The problem is not whether self-exclusion helps. It is that too few people ever access it. An international systematic review and meta-analysis found the prevalence of self-exclusion in the general adult population was 0.26 per cent, rising to 15.2 per cent among people in the so-called problem gambling category and 2.5 per cent among moderate-risk gamblers. Awareness was only 11.09 per cent among people who gamble. In

[28] Bijker, R., et al. "International Prevalence of Self-Exclusion from Gambling: A Systematic Review and Meta-Analysis." Current Addiction Reports (2023). https://doi.org/10.1007/s40429-023-00510-6. ; https://pmc.ncbi.nlm.nih.gov/articles/PMC10001959/. ;
[29] Devault-Tousignant, C., et al. "Qualitative Experience of Self-Exclusion Programs: A Scoping Review." International Journal of Environmental Research and Public Health 20, no. 5 (2023): 3987.
[30] Livingstone, Charles. How Electronic Gambling Machines Work. Australian Gambling Research Centre Discussion Paper No. 8. Melbourne: Australian Institute of Family Studies, 2017. https://aifs.gov.au/resources/policy-and-practice-papers/how-electronic-gambling-machines-work.
[31] Wesley Mission. NSW Poker Machine Loss Data Analysis Q1 2026. Sydney: Wesley Mission, June 2026. https://www.wesleymission.org.au/hubfs/About-us/202606%20NSW%20Poker%20Machine%20Loss%20Data%20Analysis%20Q1%202026.pdf.; Liquor & Gaming NSW. "Quarterly Gaming Reports." Accessed September 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machine-data-reports/quarterly-gaming-reports.
[32] Dataworks Group. "Positive Outcomes Reported by BetStop™ Users." November 13, 2025. https://dataworksgroup.com.au/2025/11/13/positive-outcomes-reported-by-betstop-users/.

practical terms, approximately one in seven people experiencing problem gambling, and one in 40 moderate-risk gamblers, have ever used self-exclusion.[33]

Research consistently identifies avoidable barriers: complicated registration, limited venue coverage, inadequate information, concern about stigma, weak staff responses, and poor integration with professional support. A register is therefore more than a database. Its effectiveness depends on coverage, trust, enforcement, human support, and consequences for venues that fail to act.[34]

A well-designed statewide register would convert a proven intervention into a population-level protection. Where self-exclusion currently reaches a small fraction of those who could benefit, a single registration that applies automatically across every pub and club in New South Wales, enabled by account-based gambling and supported by warm referrals to counselling and financial support, removes most of the friction that keeps people from accessing it. The evidence base is strengthened further where exclusion is enforced systemically rather than relying on venue staff recognising an individual and then intervening, particularly given NSW research findings that very few patrons directly ask staff for help and that staff rarely approach patrons displaying signs of harm unless assistance is requested.[35]

Self-exclusion nonetheless remains one measure among several. It requires a person to recognise harm and act on it, usually after losses have escalated. At population level it cannot substitute for restrictions on product design, availability, marketing and expenditure. The register should be understood as an essential component of a comprehensive and effective public-health system, not as the system itself.[36]

2.3.3. Third-party exclusions

Third-party exclusion addresses situations where family members, venues or police observe serious harm or criminal risk before the person self-excludes. It also creates risks of misuse, particularly in family conflict or coercive-control contexts. Applications should be independently assessed against published criteria, include urgent interim protection where necessary, protect applicant safety and provide notice, response and review rights subject to safety exceptions.

2.3.4. Facial recognition technology (FRT)

Wesley Mission does not regard facial recognition as a harm-minimisation measure. It cannot deliver loss limits, time limits, activity statements or pre-commitment, and it identifies people only after they have arrived at a venue. It still relies on human intervention. It is a compliance tool, not a protective one, and it should not be counted as a substitute for account-based gambling. Any FRT system should prohibit marketing and profiling, minimise retention, require independent accuracy

[33] Bijker, R., et al. "International Prevalence of Self-Exclusion from Gambling: A Systematic Review and Meta-Analysis." Current Addiction Reports (2023). https://doi.org/10.1007/s40429-023-00510-6.; Greo Evidence Centre. Prevalence of Use and Awareness of Self-Exclusion from Gambling: Evidence Summary. Guelph, ON: Greo Evidence Centre, 2023. https://www.greo.ca/Modules/EvidenceCentre/files/Bijker%20et%20al%20%282023%29_International%20prevalence%20of%20selfexclusion%20from%20gambling_final.pdf.

[34] Bijker, R., et al. "International Prevalence of Self-Exclusion from Gambling: A Systematic Review and Meta-Analysis." Current Addiction Reports (2023). https://doi.org/10.1007/s40429-023-00510-6.; Devault-Tousignant, C., et al. "Qualitative Experience of Self-Exclusion Programs: A Scoping Review." International Journal of Environmental Research and Public Health 20, no. 5 (2023): 3987. https://pmc.ncbi.nlm.nih.gov/articles/PMC10001959/.; Motka, F., et al. "Who Uses Self-Exclusion to Regulate Problem Gambling? A Systematic Literature Review." Journal of Behavioral Addictions 7 (2018). https://doi.org/10.1556/2006.7.2018.96.; Kotter, R., et al. "A Systematic Review of Land-Based Self-Exclusion Programs." Journal of Gambling Studies 35 (2019): 367-394.

[35] New South Wales Government. "Preparing an LIA." Accessed October 2, 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/local-impact-assessments/preparing-an-lia.

[36] Bijker, R., et al. "International Prevalence of Self-Exclusion from Gambling: A Systematic Review and Meta-Analysis." Current Addiction Reports (2023). https://doi.org/10.1007/s40429-023-00510-6.; Devault-Tousignant, C., et al. "Qualitative Experience of Self-Exclusion Programs: A Scoping Review." International Journal of Environmental Research and Public Health 20, no. 5 (2023): 3987. https://pmc.ncbi.nlm.nih.gov/articles/PMC10001959/.; Motka, F., et al. "Who Uses Self-Exclusion to Regulate Problem Gambling? A Systematic Literature Review." Journal of Behavioral Addictions 7 (2018). https://doi.org/10.1556/2006.7.2018.96.

and bias testing, include lived experience in the design, mandate human verification before adverse action, and provide correction, complaint and remedy pathways.[37]

2.3.5. Governance and independence

The register should be overseen by a statutory regulator but operationally separated from gambling operators and industry peak bodies. No entity operating or governing the register should provide gambling services, lobby for gambling interests, or use register information for commercial purposes. BetStop provides a relevant Australian governance precedent: a single registration applies across licensed online wagering providers, and the statutory framework restricts involvement by gambling interests. The NSW model should adopt equivalent safeguards while responding to the practical differences of pub and club venues.

- Independent board or statutory governance with lived-experience, privacy, clinical, legal and community expertise.
- Stable funding through a legislated levy or hypothecated gambling tax revenue, not discretionary venue membership fees.
- A single statewide record and a single registration process, with no arbitrary limit on the number of venues covered.
- Legally enforceable venue duties to prevent access and gambling, supported by graduated penalties and public compliance reporting.
- Prohibition on commercial use of data collection, including: loyalty matching, marketing, customer profiling or unrelated law-enforcement access.

2.3.5.1. Accessible, supported registration

- An option for remote registration, so there is no requirement for a person to enter a gambling venue to self-exclude.
- Plain-English information translated and accessible formats, culturally safe options and support for people without standard identity documents.
- A choice of exclusion periods, including long-term and indefinite exclusion, with cooling-off safeguards before revocation.
- Immediate confirmation, clear explanation of what will happen at a venue, and realistic information about the limits of the scheme.
- Warm referrals to gambling counselling, financial counselling, family support, and mental-health services, while preserving voluntary access to treatment.

2.3.5.2. Evaluation and public accountability

- Publish registrations, coverage, attempted entries, confirmed interventions, breaches, venue failures, complaints, reviews and referrals in de-identified form.
- Measure outcomes beyond the number of registrations, including access prevented, gambling reduction, wellbeing, financial recovery, treatment engagement and unintended consequences.

[37] Selwyn, N., et al. "Facing Up to Problem Gambling: Tracing the Emergence of Facial Recognition Technology as a Means of Enforcing Voluntary Self-Exclusion." Journal of Gambling Studies (2024).

- Commission an independent pre-implementation assessment, a public evaluation after twelve months and recurring reviews thereafter.
- Involve people with lived and living experience in design, governance, testing and evaluation, and pay them for their expertise.

2.3.6. Lived-experience spotlight: Harm hidden from those closest

One affected partner had never used a poker machine, yet their family lost its home, investment properties, savings and much of its long-term financial security after their partner lost more than $4 million over six years.

Following a period of treatment and recovery, their partner returned to gambling. In one six-month period, they lost around $600,000, averaging approximately $25,000 a week. Much of this occurred during one night each week, typically between 11pm and 4am.

The family also encountered significant gaps in the existing exclusion system. Even after excluding from multiple venues, many other venues remained accessible.

The gambling remained hidden for years. The affected partner describes it as a "silent" addiction surrounded by shame and secrecy.

This account has been anonymised and lightly edited for clarity. Details that could identify the individuals, venues or locations have been removed.

2.4. Councils and communities

WESLEY MISSION CALL

Give councils statutory rights to be notified, make submissions and seek merits review or appeal in every substantive poker-machine decision affecting their area.

2.4.1. Current situation

Poker machines occupy a privileged position in the NSW planning and licensing framework.

Section 209 of the *Gaming Machines Act 2001* provides that an environmental planning instrument cannot prohibit, require development consent for, or otherwise regulate or restrict the installation, keeping or operation of approved gaming machines in hotels or clubs. Any planning provision that attempts to do so is taken to have no effect. A consent authority cannot impose conditions regulating gaming machines and cannot refuse a development consent to a hotel or club for any reason relating to the installation, keeping or operation of those machines. In practical terms, a council cannot refuse a development application on poker machine grounds and cannot use its planning instruments to manage cumulative local exposure.

This is an unusual planning carve-out that applies to few other products with comparable public health impacts. [38]

Participation in gaming-machine decisions is linked to whether an application triggers a Local Impact Assessment. Every venue in NSW sits within a Statistical Area Level 2, which the Independent Liquor & Gaming Authority ranks by relative risk based on existing machine numbers, gaming revenue and socio-economic disadvantage. Band 3 covers the 20 per cent of areas at highest relative risk, Band 2 the middle 30 per cent, and Band 1 the remaining 50 per cent. Whether an assessment is required, and whether it is a Class 1 or Class 2 assessment, depends on the band and the size of the proposed increase. A Class 1 assessment requires the applicant to demonstrate a positive contribution to the local community; a Class 2 assessment requires an overall positive impact.[39]

A significant proportion of machine movements attract no community assessment at all. No Local Impact Assessment is required for a low-range increase of 20 or fewer machines over twelve months in a Band 1 area. Nor is one required where entitlements are transferred or leased within the same local statistical area, within the same local government area where the source area is ranked equally or higher, or between adjoining areas on the same basis. These exemptions mean that machines can move into a community without any formal opportunity for that community to comment.

Even where an assessment is required, the council's role is advisory. The applicant must provide a copy of the application and assessment to the local council and police, and the council then has 60 calendar days to make a submission. The Independent Liquor & Gaming Authority is the decision-maker. Councils have no decision-making role, no merits review right and no avenue of appeal. A council may therefore document serious local concerns, within a fixed and often short window, and have no further standing once the decision is made.

Local councils hold relevant evidence about disadvantage, population change, housing stress, transport, safety, town centres and service demand. Aboriginal-controlled organisations, multicultural services, financial counsellors and people with lived experience also hold evidence not visible in venue applications or statewide datasets.

The statutory tests compound this. A Class 1 assessment asks whether the increase will make a positive contribution, and a Class 2 assessment whether it will have an overall positive impact. Neither requires the applicant to demonstrate that additional machines will not increase harm. The applicant should bear the burden of demonstrating that an application will not increase harm. A community-benefit payment should not be treated as cancelling foreseeable harm from additional or relocated machines.

2.4.2. Why local evidence matters

The NSW Auditor-General reported in June 2025 that gaming-machine losses and the social costs of gambling harm remain disproportionately concentrated in socio-economically disadvantaged communities. The Auditor-General found that the regulatory strategy did not sufficiently focus on areas at high risk of gambling harm or set targets for reducing harm. It also found that many large venues had not had licensee conditions reviewed in recent years. These are systemic shortcomings that local evidence can help expose, but that local communities cannot correct without formal rights. Additionally, a 2025 report by the Australia Institute found that there was a disproportionately high number of poker machines in areas with a high Indigenous population. Indigenous communities are also disproportionately impacted by gambling harm. Indigenous elders

[38] Gaming Machines Act 2001 (NSW), s 209. https://classic.austlii.edu.au/au/legis/nsw/consol_act/gma2001130/s209.html.; Gaming Machines Act 2001 (NSW). Current Consolidated Act. https://classic.austlii.edu.au/au/legis/nsw/consol_act/gma2001130/.
[39] New South Wales Government. "Preparing an LIA." Accessed October 2, 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/local-impact-assessments/preparing-an-lia.

and decision-making bodies should be included in decisions regarding poker machine accessibility in their communities. [40][41]

Local councils hold relevant information about population change, disadvantage, housing stress, town centres, transport, community safety and demand for local services. Community organisations and Aboriginal-controlled, multicultural, financial-counselling and family services hold knowledge that may not appear in industry applications or statewide datasets. A credible assessment must treat this evidence as central rather than incidental.[42]

2.4.3. Councils leading the way in harm reduction

Regulation of poker machines is primarily an NSW Government responsibility. State legislation determines where machines may operate, how entitlements are allocated and transferred, and the processes through which venues may apply to increase their number of machines. Councils have limited formal decision-making rights within this system, despite being responsible for many of the services, facilities and local planning decisions affected by gambling harm.

Nevertheless, councils can help prevent and reduce harm through the powers and resources they already hold. This can include establishing policies for council-owned land and facilities, placing conditions on leases and licences, restricting gambling advertising and sponsorship, supporting local services, publishing community information, participating in Local Impact Assessment processes, convening community stakeholders and advocating for stronger state and federal regulation.

The actions of Lane Cove Council and Northern Beaches Council demonstrate how councils can exercise local leadership even within the constraints of the current regulatory framework. Their approaches also reinforce the case for giving all NSW councils clearer statutory rights to participate in poker-machine decisions affecting their communities.

2.4.3.1. Lane Cove Council: using Council-owned venues to reduce gambling harm

In June 2025, Lane Cove Council adopted its Gambling Harm Minimisation Policy[43], which commits Council to phasing out poker machines from Council-owned venues as leases are renewed, working with existing venue operators towards poker machine-free venues, restricting gambling advertising, supporting gambling harm minimisation services and raising community awareness of gambling harm.

The policy takes a broader approach to Council's role in preventing gambling harm, including guiding decisions about Council land and facilities, community programs, events and partnerships, and strengthening advocacy and collaboration with relevant organisations. It aims to support a healthy, inclusive and safe community by reducing exposure to gambling harm, particularly for vulnerable individuals and communities.[44]

[40] Audit Office of New South Wales. Regulation of Gaming Machines. Sydney: Audit Office of New South Wales, June 12, 2025. https://www.audit.nsw.gov.au/our-work/reports/regulation-of-gaming-machines.
[41] Harrington, H., et al. "Poker Machines in Areas of Australia with High Indigenous Populations: An Analysis of Concentration by LGA." Canberra: The Australia Institute, 2025. https://australiainstitute.org.au/report/poker-machines-in-indigenous-australia/.
[42] Audit Office of New South Wales. Regulation of Gaming Machines. Sydney: Audit Office of New South Wales, June 12, 2025. https://www.audit.nsw.gov.au/our-work/reports/regulation-of-gaming-machines.; Audit Office of New South Wales. "Report Snapshot: Regulation of Gaming Machines." June 12, 2025. https://www.audit.nsw.gov.au/media-release/report-snapshot-regulation-of-gaming-machines.; Bestman, A., et al. "Attitudes Towards Community Gambling Venues and Support for Regulatory Reform." Harm Reduction Journal 15 (2018).
[43] Lane Cove Council, "Minutes of Ordinary Council Meeting, 18 July 2024," July 18, 2024, https://lanecove.infocouncil.biz/Open/2024/07/CNL_18072024_MIN.PDF
[44] Lane Cove Council, "Gambling Harm Reduction Policy," accessed October 8, 2026, https://www.lanecove.nsw.gov.au/Community/Community-Services/Gambling-Harm-Reduction-Policy.

2.4.3.2. Northern Beaches Council: building a community-wide response to gambling harm

In March 2024[45], Northern Beaches Council adopted a Gambling Harm Minimisation Policy that recognises gambling harm as a community issue and supports an evidence-based, public health approach to preventing harm from poker machines and online gambling. While gambling regulation is primarily the responsibility of state and federal governments, the policy identifies ways Council can respond locally through education, advocacy and collaboration with community organisations.

As part of this approach, Council provides information about local gambling support services. Council has also hosted a community roundtable bringing together community members and service providers to share knowledge, ideas and solutions to address gambling harm in the Northern Beaches. Its policy also includes commitments to reducing or eliminating gambling advertising when entering into or renewing leases and licences on Council-owned or managed land, and providing space for community organisations and gambling-harm stakeholders to come together and discuss local responses.[46]

2.4.3.3. Councils' role and limitations

The Lane Cove Council and Northern Beaches Council examples demonstrate that councils can use their existing landowner, policy, service and advocacy functions to reduce gambling harm. However, these powers do not give councils a consistent or meaningful role in state decisions concerning poker-machine increases, transfers or relocations.

This creates a gap between councils' responsibility for local community wellbeing and their formal influence over decisions that can increase local exposure to poker machines.

Councils should have a formal voice in poker-machine decisions that affect the wellbeing of their communities.

2.5. Data transparency and social-impact measurement

WESLEY MISSION CALL

Publish venue-level losses, machine numbers and entitlements at least every six months, and commission recurring independent measurement of the social impacts of gambling in NSW.

2.5.1. Current situation

Since 2024, the Department of Liquor and Gaming has published quarterly data on net profit (or customer losses), taxation revenue, number of poker machines and number of venues by local government area (LGA) as well as annual financial year reports. They also report rankings of venues by net profit per gaming machine. Data for clubs and hotels are published separately as each have a slightly different reporting period to the Department.

If there are four or fewer venues in an LGA, the data for that LGA is bundled with one or more neighbouring LGAs. This bundling is not consistent, that is, if there are 4 clubs and 6 hotels in an LGA, only the club data will be bundled. If venues open and close over time, the LGAs that are bundled together may change. Coupled with the relativity of venue rankings, it is difficult to undertake reliable venue-level analysis or consistently track gambling expenditure trends within

[45] Northern Beaches Council, *Gambling Harm Minimisation Policy*, Council Policy NB-P-21, adopted March 26, 2024, https://www.northernbeaches.nsw.gov.au/sites/default/files/media/files/2024-04/gambling-harm-minimisation-policy.pdf?1791419472.
[46] Northern Beaches Council, "Gambling Information and Help," accessed October 8, 2026, https://www.northernbeaches.nsw.gov.au/community/safety-and-wellbeing/gambling-information-and-help.

some communities. The effect is that the least visible communities are often small regional ones, where a single venue may account for most local losses.

New South Wales already publishes venue-level information. Liquor & Gaming NSW releases a monthly licensed premises list containing, for every venue in the state, the licence name, premises address, local government area, Statistical Area Level 2 name and band, the number of gaming machine entitlements held and the number of operating electronic gaming machines. The State therefore already identifies every venue and the number of machines it operates. The only element withheld is how much money those machines take.

2.5.1.1. Victorian Model

Venue-level gaming expenditure data is already published in Australia. The Victorian Gambling and Casino Control Commission publishes semi-annual electronic gaming machine venue-level expenditure data, alongside monthly expenditure data by local government area and annual density data. An Expenditure by Venue report is maintained on the regulator's website and is regularly updated. The Victorian Responsible Gambling Foundation republishes this for community information, including per capita amounts, rankings, and comparisons.[47]

This demonstrates that venue-level publication is compatible with commercial operation. Victorian venues continue to operate, compete and trade in a market where their gaming expenditure is a matter of public record. A claim that publication in New South Wales would cause commercial harm needs to explain why the same disclosure has not had that effect in Victoria.

2.5.2. The value of venue-level data

Currently, the government seeks to balance transparency with confidentiality by publishing venue rankings rather than venue-level loss data. However, rankings already identify venues with the highest gambling expenditure, meaning the practical distinction is often one of transparency rather than anonymity.

Rankings alone do not reveal the magnitude of gambling losses occurring within a venue. A ranking may indicate that a venue is among the highest-performing gambling venues in the state, but it does not show whether community losses amount to hundreds of thousands, millions, or tens of millions of dollars. Understanding the scale of losses is essential for assessing the extent of gambling harm within a community and the level of support services that may be required.

Gambling losses are not merely a financial measure, they are an indicator of community exposure to gambling-related harm. Venue-level loss data would enable communities, researchers and policymakers to better understand where harm is concentrated, monitor trends over time, evaluate the effectiveness of reforms, and identify locations where additional support efforts may be warranted.

2.5.3. Why gambling losses are not enough

Player losses are an essential measure of the scale and geographic concentration of gambling expenditure, but they are not a direct measure of the harms that follow. The effects of gambling extend beyond the person who gambles to partners, children, wider family, employers, creditors, services, governments and communities. Harm can include financial deprivation, debt, relationship

[47] Victorian Gambling and Casino Control Commission. "Gambling Data." Accessed October 2, 2026. https://www.vgccc.vic.gov.au/for-community/gambling-victoria/gambling-data.; Victorian Government DataVic. "Current Gaming Expenditure by Venue." Updated August 2025. https://discover.data.vic.gov.au/dataset/current-gaming-expenditure-by-venue.

breakdown, psychological distress, housing insecurity, reduced work or study performance, crime and demands on health, legal and social services.[48]

Australian harm research supports a public-health approach that measures impacts across the full spectrum of gambling risk. A significant share of aggregate harm occurs among people outside the highest-risk clinical category because lower-risk groups are much larger. An NSW assessment should therefore avoid limiting its scope to people directly experiencing gambling harm, or treatment populations. [49]

Victoria's 2023 social-cost study demonstrates the value of a recurring state-level assessment. It estimated tangible and intangible impacts across financial, emotional, family, productivity, government-service, crime and community categories, including impacts on affected others. According to the study, for every $1 of net financial benefit or tax revenue generated by the gambling industry, it costs the Victorian community roughly $6 in social and economic harm. NSW should develop its own transparent methodology rather than importing a Victorian dollar figure, but the categories and public-accountability model provide a practical starting point. [50]

2.6. Poker machine taxation supporting the community

WESLEY MISSION CALL

Legislate a fixed proportion of poker-machine taxation revenue for independent harm prevention, treatment, affected-other support, research, public reporting and local community wellbeing.

2.6.1. Current situation

Poker machines remain the most profitable form of gambling in New South Wales and are responsible for the majority of gambling-related losses experienced by individuals and communities. In 2024-25, gaming losses on gaming machines totalled $9.3 billion, generating approximately $2.47 billion in government revenue. Tax revenue from gaming machines in clubs and hotels is expected to rise by 2.8% and 7.5% on average annually, respectively, over the next 4 years.[51]

[48] Rintoul, A., and A. Thomas. Pre-Commitment Systems for Electronic Gambling Machines. AGRC Discussion Paper No. 9. Melbourne: Australian Gambling Research Centre, 2017. https://aifs.gov.au/agrc/sites/default/files/publication-documents/1707_agrc_dp9-pre-commitment-v3.pdf.; Browne, M., et al. Social Costs of Gambling to Victoria 2023. Melbourne: Victorian Department of Justice and Community Safety, June 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Victorian Department of Justice and Community Safety. Social Costs of Gambling to Victoria 2023: Summary and Factsheets. Melbourne: Victorian Government, 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Browne, M., et al. "Unambiguous Evidence That Over Half of Gambling Problems in Australia Are Caused by Electronic Gambling Machines." Journal of Behavioral Addictions 12, no. 1 (2023): 182-193. https://pubmed.ncbi.nlm.nih.gov/36729109/.; Paterson, M., M. Taylor, and M. Gray. "Trajectories of Social and Economic Outcomes and Problem Gambling Risk in Australia." Social Indicators Research (2020).

[49] Browne, M., et al. Social Costs of Gambling to Victoria 2023. Melbourne: Victorian Department of Justice and Community Safety, June 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Victorian Department of Justice and Community Safety. Social Costs of Gambling to Victoria 2023: Summary and Factsheets. Melbourne: Victorian Government, 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Browne, M., et al. "Unambiguous Evidence That Over Half of Gambling Problems in Australia Are Caused by Electronic Gambling Machines." Journal of Behavioral Addictions 12, no. 1 (2023): 182-193. https://pubmed.ncbi.nlm.nih.gov/36729109/.; Paterson, M., M. Taylor, and M. Gray. "Trajectories of Social and Economic Outcomes and Problem Gambling Risk in Australia." Social Indicators Research (2020).

[50] Browne, M., et al. Social Costs of Gambling to Victoria 2023. Melbourne: Victorian Department of Justice and Community Safety, June 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Victorian Department of Justice and Community Safety. Social Costs of Gambling to Victoria 2023: Summary and Factsheets. Melbourne: Victorian Government, 2025. https://www.justice.vic.gov.au/safer-communities/gambling/social-costs-of-gambling-to-victoria-2023.; Browne, M., et al. "Unambiguous Evidence That Over Half of Gambling Problems in Australia Are Caused by Electronic Gambling Machines." Journal of Behavioral Addictions 12, no. 1 (2023): 182-193. https://pubmed.ncbi.nlm.nih.gov/36729109/.

[51] New South Wales Government. Budget Statement 2026-27. Sydney: NSW Treasury, 2026. https://www.nsw.gov.au/sites/default/files/noindex/2026-06/bp1-budget-statement-nsw-budget-2026-27.pdf.

Importantly, gaming machine profits represent money lost by players, and accelerating profit growth represent accelerating harm. While gambling taxation provides a substantial and growing source of state revenue, it also creates a responsibility to ensure that a meaningful proportion of that revenue is reinvested into preventing and addressing gambling-related harm.

Communities experiencing the highest gambling losses are often the same communities facing increased financial hardship, family stress, mental health challenges and demand for support services. Despite this, revenue collected from gaming machine taxation is largely absorbed into general government revenue rather than being dedicated to gambling harm prevention, treatment and recovery initiatives. A more intentional approach to reinvestment would help ensure that communities most affected by gambling losses receive support proportionate to the level of harm being experienced.

2.6.2. Gaming machine taxation rates in NSW

Hotels are subject to higher gaming machine tax rates, with the largest operators facing tax rates of up to 50 per cent on annual profit over $5 million. The club scale is also internally inconsistent. The marginal rate rises to 29.9 per cent on annual profit between $1 million and $1.8 million, then falls to 19.9 per cent on profit between $1.8 million and $5 million, before climbing again. A club earning $4 million a year from poker machines pays a lower marginal rate than a club earning $1.5 million and does not face a comparable rate again until its annual gaming profit exceeds $20 million. Clubs benefit from substantially lower taxation rates reflecting their not-for-profit status, with the highest marginal rate of 28.4 per cent rate for over $20 million annual profit, despite many large clubs generating millions of dollars annually from gaming machine revenue. While gaming machine profits have increased significantly over time, the underlying tax structure has remained largely unchanged for more than a decade.[52]

In 2025-26, annual revenue from all gambling taxes was $3.8 billion, with forward estimates predicting $4.9 billion by 2029-2023[53]. The Office for Responsible Gambling received $42.2 million[54] in 2025, which comes from the responsible-gambling levy paid by casino operators as well as community benefit payments and gaming machine lease levy payments made by some clubs and hotels under the Gaming Machines Act 2001, tax on wagering expenditure in NSW also contributes to the fund. As it stands, 1.11% of gambling tax revenue is distributed to the Office for Responsible Gambling.

2.6.3 ClubGRANTS and community contributions

In addition to the lower tax rate, clubs are also eligible to receive tax concessions through the ClubGRANTS scheme. Under these arrangements, eligible clubs may offset a portion of their tax obligations by making contributions to approved community projects and organisations. The intention is that gaming machine profits are partially reinvested into local communities and used to support social infrastructure and community wellbeing.

Wesley Mission recognises and values the contribution that clubs make to community life across New South Wales, including in areas where clubs are significant providers of local facilities, employment and social connection. Many worthwhile programs have been funded through ClubGRANTS. Our concern is not with the existence of community investment, but with its source and its governance: community benefit should not depend on losses generated through gambling

[52] https://www.qgso.qld.gov.au/statistics/theme/society/gambling/australian-gambling-statistics ; https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-machines/fees-and-taxes
[53] Surging pokies revenue proves NSW Labor has failed to reduce gambling harm as promised, advocates say | New South Wales politics | The Guardian
[54] GambleAware – our funding | GambleAware NSW

harm, particularly where those losses fall most heavily on the communities least able to sustain them.

Concerns have also been raised about transparency, accountability and whether some funded activities primarily benefit the contributing clubs themselves. Because the scheme operates as an alternative to taxation, expenditure decisions rest substantially with individual clubs rather than with an independent body assessing community need. The NSW government commissioned a review of the ClubGRANTS scheme in 2023, with the final report delivered to Ministers in January 2025.[55] As of October 2026, there had been no government response to the ClubGRANTS review. This is a further argument for a legislated and independently allocated proportion of gaming machine taxation revenue, which would ensure that investment in harm prevention and community wellbeing is determined by evidence of need rather than by the preferences of the venues generating the losses.

2.6.3. Comparison with Victoria

Compared with New South Wales, Victoria captures a much larger proportion of total gaming machine revenue as has a more progressive taxation structure that applies higher marginal tax rates at lower revenue thresholds. In 2024-25, Victoria reported a total of $3.1 billion gaming machine losses and $1.3 billion in tax revenue, resulting in 41 per cent of collected as taxation revenue. By comparison, New South Wales collected 27 per cent of losses through taxation.[56]

Importantly, Victoria also dedicates gaming machine taxation revenue to specific public benefit funds, including the Hospitals and Charities Fund, the Mental Health Fund and the Community Support Fund. These arrangements ensure that a portion of gambling taxation revenue is directly linked to healthcare services, community programs and initiatives that reduce gambling-related harm.

2.6.4. What reform should deliver

Wesley Mission calls for a legislated proportion of gaming machine taxation revenue to be dedicated to independent harm prevention, treatment, support for affected others, research, public reporting and local community wellbeing. Allocation should be independent, transparent and publicly reported, and should be additional to rather than a substitute for structural reform. Funding should prioritise the communities experiencing the highest poker machine losses.

2.7. Reducing poker-machine numbers

WESLEY MISSION CALL

Set a clear, measurable and harm-based target to reduce poker-machine numbers, prioritising communities with high losses, density and disadvantage.

[55] NSW Government, "ClubGRANTS Review," accessed October 8, 2026, https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/liquor-gaming-nsw-grants/clubgrants-review
[56] Victorian Government DataVic. "Current Gaming Expenditure by Venue." Updated August 2025. https://discover.data.vic.gov.au/dataset/current-gaming-expenditure-by-venue.

2.7.1. Current situation

According to the NSW Quarterly Gaming Machine Reports as of Q2 2026 there are 88,039 poker machines across 2,110 clubs and hotels in New South Wales. This is close to half of all gaming machines in Australia and leaves New South Wales well out of step with other jurisdictions.

The NSW *Gaming Machines Act* includes an objective of ongoing reduction through the tradeable entitlement scheme. However, the Auditor-General found that machine numbers had increased since 2021-22 and recommended ensuring the forfeiture scheme achieves its legislative objectives. [57]

The NSW Gaming Reform Package announced in August 2026 contains four measures directed at reducing machine numbers. The forfeiture rate applying when gaming machine entitlements are traded will increase from one in three to one in two, so that for every two entitlements traded one is permanently removed. A new sinking cap will reduce the statewide cap as entitlements are removed from circulation. Existing exemptions that allowed entitlements to be transferred without forfeiture will be tightened. Venues will also be given the option to voluntarily cancel entitlements. [58]

2.7.2. The case for reduction

The NSW Gaming Reform Package measures are welcome but do not go far enough. They rely largely on reductions occurring as entitlements are traded or voluntarily surrendered, rather than setting a clear statewide reduction target and timetable. New South Wales should bring itself closer into line with stronger jurisdictional approaches by legislating a measurable reduction pathway and ensuring reductions cannot be offset by transfers into already over-exposed areas.

Raw statewide reduction can conceal movement of machines into communities already experiencing high losses. A harm-based approach should prioritise removal from areas with high losses, density, disadvantage and service demand, and assess transfer and lease decisions cumulatively.

Transition support should help venues diversify into hospitality, events, entertainment and community activity. Public assistance should be conditional on measurable reductions in entitlements, machine operation, losses and reliance on gambling revenue.

2.7.3. Comparison to other jurisdictions

Across Australia the number of poker machines in pubs and clubs varies, with a range of different caps, with varying available datasets. In Western Australia there are no poker machines in pubs and clubs.

In Victoria there are currently 27,310 poker machine entitlements available to venue operators:

- 13,211 are allocated to club venue operators
- 14,099 are allocated to hotel venue operators.

[57] Audit Office of New South Wales. Regulation of Gaming Machines. Sydney: Audit Office of New South Wales, June 12, 2025. https://www.audit.nsw.gov.au/our-work/reports/regulation-of-gaming-machines.; Audit Office of New South Wales. "Report Snapshot: Regulation of Gaming Machines." June 12, 2025. https://www.audit.nsw.gov.au/media-release/report-snapshot-regulation-of-gaming-machines.; Gaming Machines Act 2001 (NSW). Current Consolidated Act. https://classic.austlii.edu.au/au/legis/nsw/consol_act/gma2001130/.

[58] Liquor & Gaming NSW. "NSW Government Gaming Reform Package." August 25, 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-reform-package/nsw-government-gaming-reform-package.; New South Wales Government. "Gaming Reform Package: Overview of Reforms." August 2026. https://www.nsw.gov.au/business-and-economy/liquor-and-gaming/gaming/gaming-reform-package.

There are distinct geographical guidelines within Victoria that define how many poker machine entitlements are allowed. Furthermore, in Victoria poker machines are licenced for a 20-year term. [59] [60]

In Queensland according to 2022 State data there is 40,988 machines were actively operating in community venues (pubs and clubs). The absolute legal cap set by the Queensland government on electronic gaming machines (EGMs) is 44,205.

The legal cap splits into

- 19,500 for hotels/pubs
- 24,705 for community clubs. [61]

In South Australia there are 12,672 poker machines in pubs and clubs across the State [62] [63].

In Tasmania there are 2,331 poker machines (electronic gaming machines) currently authorised in Tasmanian hotels and clubs.[64]

The Northern Territory has a maximum cap of 1,659 poker machines in pubs and clubs.[65]

The ACT has around 3,500 poker machines as of October 2026 but has committed to reducing that number by 500 machine authorisations every four years to no more than 1,000 by 2045, alongside introducing mandatory cashless gaming, loss limits, reduced operating hours and restrictions on access to cash.[66]

2.7.4. What reform should deliver

- A published statewide reduction target and timetable.
- Geographic priorities grounded in harm indicators.
- Closure of transfer and forfeiture loopholes.
- Public reporting on entitlements, authorised machines, machines in operation and losses.
- Independent evaluation of whether reductions lower losses and harm.
- Conditional transition assistance and workforce planning.

2.8. Cross-cutting implementation principles

Independence

Governance and evaluation should be separated from gambling operators and peak bodies. Conflicts and industry funding must be disclosed.

[59] Victorian Gambling and Casino Control Commission. "Poker Machine Entitlements." Accessed 2026. https://www.vgccc.vic.gov.au/for-gambling-providers/venue-operators-and-poker-machines/poker-machine-entitlements.
[60] Department of Justice and Community Safety Victoria, "Gaming Machine Entitlements," accessed October 8, 2026, https://www.justice.vic.gov.au/safer-communities/gambling/gambling-licences/gaming-machine-entitlements.
[61] ABC News. "Gambling Advocates 'Horrified' as Queensland Pokies Players Lose Record $301 Million in a Month, Prompting Calls for Reform." August 18, 2022. https://www.abc.net.au/news/2022-08-18/qld-record-gambling-losses-calls-to-remove-pokies-in-pubs-clubs/101337424.
[62] South Australian Council of Social Service. 2024 SA Gambling Statistics. Adelaide: SACOSS, 2024. https://sacoss.org.au/wp-content/uploads/2024/11/2024-SA-Gambling-Statistics.pdf
[63] Consumer and Business Services South Australia. "Register of Gaming Machine Entitlements." Accessed 2026. https://www.cbs.sa.gov.au/sections/LGL/register-of-gaming-machine-entitlements.
[64] Department of Treasury and Finance Tasmania. "Gaming and Wagering Industry Data." Accessed 2026. https://www.treasury.tas.gov.au/liquor-and-gaming/gambling/community-information/gambling-data/gaming-and-wagering-industry-data.
[65] Northern Territory Government. "Gaming Machines in Clubs and Pubs." Accessed 2026. https://nt.gov.au/industry/gambling/licences/gaming-machines-in-clubs-pubs.
[66] Chief Minister, Treasury and Economic Development Directorate. "ACT Unveils Australia's Most Significant Gaming Reforms." 2026. https://www.cmtedd.act.gov.au/open_government/inform/act_government_media_releases/marisa-paterson-mla-media-releases/2026/act-unveils-australias-most-significant-gaming-reforms.

Lived and living experience

People affected by gambling harm should be involved in design, testing, governance and evaluation, with consent, support and payment for expertise.

Privacy and data minimisation

Collect only what is necessary, prohibit commercial reuse, apply strict access and deletion controls, and provide correction and remedy rights.

Equity and accessibility

Design should include plain English, translated and accessible formats, culturally safe pathways and support for people without standard identity documents or banking access.

Evaluation and transparency

Establish baselines, publish methods and report outcomes, unintended consequences, compliance and corrective action.

Prevention plus support

Services are essential but cannot substitute for structural reforms that reduce harmful availability, product intensity and industry incentives.

3. Conclusion

New South Wales has a genuine opportunity to move from fragmented and reactive safeguards towards a coherent public-health system. The NSW Government's August 2026 Gaming Reform Package provides important architecture, but voluntary participation, delayed implementation, limited community rights and incomplete data would leave substantial harm untouched.

The reforms in Wesley Mission's refreshed platform are mutually reinforcing. A shutdown reduces harmful availability. Account-based gambling embeds safeguards. An independent exclusion register supports people seeking protection. Council rights bring local evidence into decisions. Venue-level data and social-impact reporting create accountability. A legislated community return funds prevention and recovery. Machine reduction lowers exposure over time.

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Wesley Mission is a part of the Uniting Church in Australia.

We acknowledge the Traditional Custodians of the land on which we work. We pay our respects to their Elders – past, present and future generations – and to all Aboriginal and Torres Strait Islander peoples and communities.

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