



Legislative Assembly for the
Australian Capital Territory

Standing Committee on the Integrity
Commission and Statutory Office
Holders

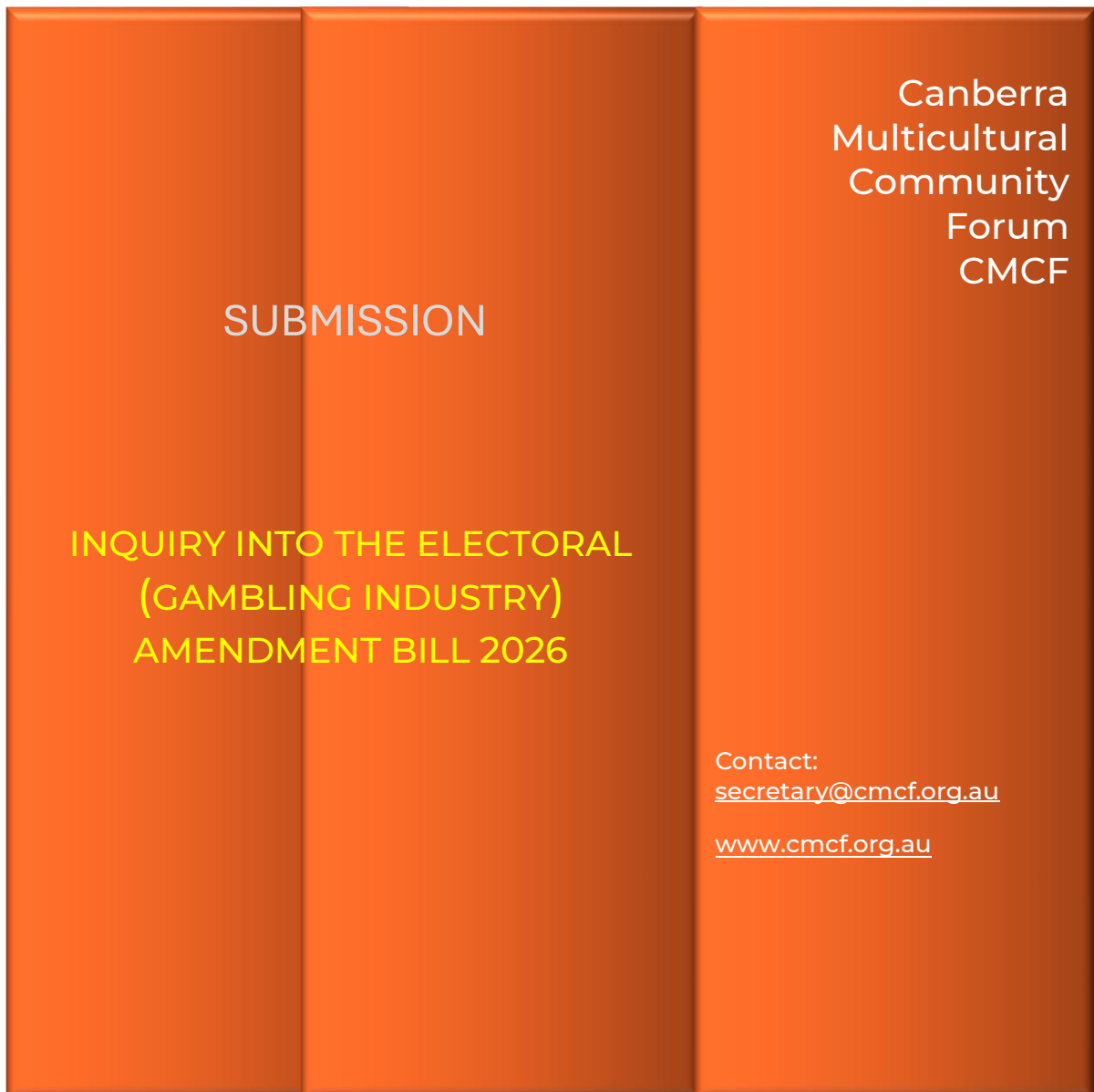
Submission cover sheet

Inquiry into the Electoral (Gambling Industry) Amendment Bill 2026

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Executive Summary

The Canberra Multicultural Community Forum (CMCF) welcomes the opportunity to provide a submission to the Inquiry into the Electoral (Gambling Industry) Amendment Bill 2026.

CMCF supports the principles of transparency, integrity and public confidence in democratic institutions. Public trust in government decision-making is fundamental to social cohesion and democratic legitimacy.

However, CMCF is concerned the Bill adopts an overly broad definition of "gambling industry entity" that fails to adequately distinguish between large commercial gambling interests and community-owned not-for-profit clubs that deliver substantial social, cultural, sporting and community benefits across the ACT.

The proposed legislation risks creating an unintended narrative that community clubs are equivalent to commercial gambling operators whose primary purpose is profit maximisation. Such an approach overlooks the unique role clubs play in supporting multicultural communities, grassroots sport, seniors, youth development, community infrastructure and social cohesion.

CMCF recommends the Committee carefully consider whether a more nuanced and proportionate framework can achieve electoral integrity objectives while recognising the unique status of community clubs.

About CMCF

The Canberra Multicultural Community Forum (CMCF) is the peak representative body for more than 115 multicultural and community organisations across the ACT.

CMCF works to promote:

- Social cohesion;
- Community participation;
- Equity and inclusion;
- Community wellbeing;
- Civic engagement;
- Cross-cultural understanding; and
- Strong partnerships between government and community.

Many multicultural organisations represented by CMCF utilise ACT club facilities for community meetings, cultural celebrations, language programs, youth activities, seniors' programs and community development initiatives.

Accordingly, the future sustainability of the club sector is a matter of direct interest to the multicultural communities of the ACT.

CMCF Position

CMCF supports measures that:

- Prevent corruption and undue influence;
- Improve transparency in political donations;
- Strengthen public confidence in democratic institutions; and
- Ensure government policy is developed in the public interest.

However, CMCF does not support policy approaches that fail to

distinguish between fundamentally different categories of organisations that happen to fall within a broad legislative definition.

The Bill proposes to prohibit donations and in-kind support from a broad range of gambling-related entities, including community clubs operating gaming machines. The explanatory statement argues gambling entities should be treated similarly to property developers and foreign entities because of the risk of undue influence.

CMCF believes this comparison is not entirely appropriate.

Foreign entities have no democratic stake in ACT society.

Property developers generally pursue commercial interests relating to planning approvals and land value.

Community clubs are fundamentally different. They are community institutions whose members are ACT residents and whose activities generate substantial social benefit.

The Unique Role of Community Clubs

ACT clubs function as important community infrastructure rather than purely commercial enterprises.

They provide:

- Community meeting spaces;
- Sporting facilities;
- Cultural event venues;
- Volunteer opportunities;
- Social connection for older Australians;
- Community grants;

- Youth development programs;
- Employment pathways;
- Support for charities;
- Multicultural events and festivals.

For many multicultural communities, clubs are among the few affordable venues capable of hosting large-scale cultural activities.

The loss or weakening of these institutions would have consequences extending far beyond gambling policy.

From CMCF's perspective, any legislative framework should recognise the distinction between:

1. Commercial gambling operators;
2. Online wagering corporations;
3. Casino operators;
4. Community-owned not-for-profit clubs.

Failure to recognise these distinctions risks creating poor public policy outcomes.

International Experiences

Globally, jurisdictions have increasingly focussed on transparency and donation disclosure rather than blanket prohibitions.

United Kingdom

The United Kingdom emphasises disclosure, transparency and reporting requirements rather than sector-wide donation bans.

Canada

Canadian provinces generally regulate donation caps and disclosure requirements while

maintaining strong oversight mechanisms.

New Zealand

New Zealand places significant emphasis on transparency and public accountability rather than broad industry-specific prohibitions.

United States

While approaches vary significantly by state, most reforms focus on disclosure, contribution limits and conflict-of-interest controls rather than complete exclusion of entire sectors.

New South Wales

The NSW model represents the closest comparison and has been cited in the explanatory statement as an influence on the ACT Bill.

However, the NSW experience remains contested, with ongoing debate regarding effectiveness, constitutional implications and whether donation bans alone materially improve policy outcomes.

The international evidence suggests that transparency, disclosure and accountability may often be more effective and proportionate than blanket exclusions.

Electoral Integrity and Community Representation

CMCF acknowledges concerns regarding the influence of money in politics.

However, the Inquiry should also consider another democratic principle:

The right of communities to participate in public life.

The explanatory statement notes participation in public affairs is a fundamental democratic right.

Community clubs are not merely commercial entities.

They represent thousands of ACT residents, volunteers, members and community organisations.

A blanket prohibition risks reducing legitimate community participation while doing little to address other significant sources of political influence, including:

- Corporate lobbying;
- Third-party advocacy organisations;
- Industry associations;
- Professional consultancies;
- Wealthy private individuals;
- Digital campaigning.

The Committee should therefore consider whether the proposed response is proportionate to the identified risk.

Multicultural Community Considerations

CMCF is particularly concerned about the implications for multicultural communities.

Many culturally diverse communities experience:

- Lower levels of political participation;
- Reduced access to decision-makers;

- Language barriers;
- Lower representation in public institutions.

Community clubs often provide one of the few pathways through which multicultural groups engage with elected representatives and public institutions.

The Bill may unintentionally weaken these engagement opportunities.

The Committee should carefully assess whether multicultural communities could experience reduced civic participation as an unintended consequence.

Recommendations

CMCF recommends the Committee:

Recommendation 1

Support stronger transparency and disclosure requirements for all political donations and in-kind support.

Recommendation 2

Undertake a detailed assessment of whether community-owned not-for-profit clubs should be treated differently from commercial gambling operators.

Recommendation 3

Consider donation caps and enhanced disclosure requirements as an alternative to a complete prohibition.

Recommendation 4

Require a Regulatory Impact Assessment examining the effect of the Bill on community clubs, sporting organisations and multicultural communities.

Recommendation 5

Establish a statutory review after three years to assess the effectiveness of the legislation in improving electoral integrity outcomes.

Recommendation 6

Consult directly with multicultural communities regarding any unintended impacts on civic participation and community representation.

Recommendation 7

Recognise the unique contribution of community clubs to social cohesion, multicultural engagement and community development in the ACT.

Conclusion

CMCF supports the objective of protecting public confidence in democratic institutions and ensuring electoral integrity.

However, good public policy requires careful distinction between organisations whose primary purpose is commercial profit and those whose primary purpose is community benefit.

The Electoral (Gambling Industry) Amendment Bill 2026 risks treating community clubs as though they are indistinguishable from commercial gambling enterprises.

CMCF believes the ACT can achieve both objectives simultaneously:

- Protect electoral integrity;
- Maintain transparency and accountability;
- Preserve the legitimate voice of community institutions;
- Protect the social infrastructure that supports multicultural communities.

The Committee should therefore consider amendments that deliver integrity without unnecessarily diminishing the civic participation of community-based organisations that contribute significantly to the social fabric of the ACT.

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