

Minister of Health and Wellness Department of Health and Wellness Barrington Tower, 1894 Barrington Street Halifax, NS B3J 2R8 Health.Minister@novascotia.ca September 21, 2020

Dear Mr. Delorey

I am writing in regard to the request from the Department of Health and Wellness for our response to the proposed dissolution of Gambling Awareness Nova Scotia (GANS) and the redirection of its assigned funds.

Our proposals and asks are given here, and are followed by explanations and rationale.

- GANS should be fully reinstated as a funded, arms-length organization with a clear mandate to be a gambling watchdog, reporting regularly on gambling issues, and a funder of various gambling awareness initiatives to communities and institutions. Apart from a defined scope of work and a specified budget, it should be free of political interference or need for ministerial approval of its grants or other activities. If desired, the government could give it a different name to clarify the new mandate.
- Currently, according to the ALC web site, only 1% of NSGC earnings are directed to education, prevention and treatment initiatives. We recommend this be increased significantly to enable effective funding for initiatives. The extra amount could be redirected from the provincial share if there is not enough resource from NSGC.
- 3. These funds should be focused on reducing gambling harms, and not redirected to other mental health needs.
- 4. Well established, reputable organizations such as GRINS should receive core funding on a five-year renewable contract basis so that long term plans can be developed and implemented and staff such as executive director and program coordinator can be retained over time to ensure continuity.

Rationale:

We at Gambling Risk Informed Nova Scotia (GRINS; formerly Kings Community Action Group on Gambling) are very concerned about the removal of GANS, a key resource to support the health and wellness of Nova Scotians, and the proposed diversion of funds to needs other than gambling issues.

We have had a long and supportive relationship with GANS, receiving not only grants to assist our work in building safer communities, freer of gambling harms, but also advice and counsel on the broad issues that this involves.

This government, and the one that preceded it, have systematically gutted GANS, first by arbitrarily firing the board, removing staffing capabilities, and then by reassigning the grant process to be administered by the Nova Scotia Health Research Foundation (NSHRF). Now the move is not only to dissolve GANS completely, but to divert funds away from community gambling issues.

There are several issues that arise from these actions:

 We will not have an "arms-length" organization that can effectively address issues of gambling harm reduction. Staff who work directly for the government department or the health district are hobbled in their ability to speak out on key issues, or to support effective actions. It is essential to have an independent organization that can act as a balance to government and industry, and can support non-profits to address the issues directly in their communities. This is particularly important due to the inherent conflict of interest the Nova Scotia government has as both the beneficiary and the regulator of gambling.

- 2. We are concerned about community grants management having been moved from GANS to NSHRF. NSHRF is very capable of supporting large institutions such as hospitals and universities in their research programs. But they do not have GANS's experience to effectively discern appropriate funding for not-for-profit community organizations. GANS was very helpful in guiding us and supporting programs that may not have the same depth of academic rigor as do those of larger institutions. That is not our role. While we work hard to ensure that our projects are evidence-based, we operate within a much smaller budget and with different expertise. Our true strengths are knowing the unique needs of our local communities and innovating new approaches that respond to those needs.
- 3. GRINS is particularly appalled at the proposal to take funds generated from gambling users and redirect them to more general mental health issues. The rationale we were given is that many people with gambling issues also have other co-occurring mental health issues. While this is true, it is essentially a money grab to try to deal with the fact that mental health services are chronically underfunded in Nova Scotia. We support the basic idea that mental health services should be adequately funded, but there are ethical issues of diverting money generated by those who have been harmed by gambling. (For example, over 40% of revenue from VLTs comes from those who are harmed by them.) There is also an issue of focussing this gambling revenue primarily on treatment issues rather than on health promotion or prevention activities. If we do not put attention on the creation and implementation of programs to raise awareness of the community impacts of gambling harms, and motivate communities to organize to build more caring and safer gambling practices, the harm will continue to grow, and costs will rise. GRINS is committed to changing the culture around gambling in Nova Scotia so that citizens are empowered to make informed choices about risky activities, and to remove the stigma of being harmed by unsafe gambling machines so that people are comfortable reaching out for help when they are in need.

There are broader issues than the removal of GANS. The current practice of funding organizations through grants, rather than core funding of operations as is done in some other provinces, is incredibly inefficient and problematic. Grants often arbitrarily focus on different sectors or issues each year, making it hard for an organization to sustain programs. This lack of continuity hobbles our ability to meet the needs of our communities. In our experience, each time we get a new grant we need to refocus our priorities and hire new staff to manage the project. Once the grant funding expires, we need to end the contracts with staff, and we lose the organizational memory plus lose our investment in training and orienting staff. For the next grant, the cycle repeats. This is an enormous waste of money and resource. Moreover, the grants often appear with little notice, and require partnerships with other organizations. Contacting organizations, getting buy in from their board (who only meet monthly at the most) can take months. Doing detailed research into best practices, designing a new project, etc., also takes considerable time if done well, and often needs to be done by an unpaid, volunteer board in their free time. For a grant proposal due in March, we need to be alerted to it in September, not the end of January. This can be very frustrating for board members, and we have in the past lost members who got fed up with the process.

GRINS looks forward to productive dialogue with the department as to how we can collaborate to create informed and caring gambling practices in communities free of gambling harms. Background on GRINS is attached.

Sincerely,

Bruce DNS

Bruce Dienes, Ph.D. Chair, GRINS

Cc: Premier; Minister of Communities, Culture and Heritage; Addictions and Mental Health Services Critic; Media.