

Reducing Pokies Harm



New Zealand Council Of
Christian Social Services

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Contact Name:	Nikki Hurst Hamish Jarvie
Organisation Name:	New Zealand Council of Christian Social Services
Organisation description:	The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the Public Consultation on Reducing Pokies Harm. NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches. Through this membership, NZCCSS represents over 250 organisations providing a range of social support services across Aotearoa. We believe in working to achieve a just and compassionate society for all, through our commitment to our faith and Te Tiriti o Waitangi. Further details on NZCCSS can be found on our website www.nzccss.org.nz .

Tirohanga Whānui | Overview

We tautoko the kaupapa to create a safer space for those struggling with gambling addictions, particularly with pokie machines. The member organisations we represent experience the effects of harmful gambling in communities on a regular basis, and we support the efforts to alleviate this stress. We believe that evidence-based policy alongside more funding for targeted services is necessary to prevent problem gamblers from simply moving to more unregulated spaces to gamble.

Our main points are:

One – Provision of adequate governmental funding to allow effective support of problem gamblers

Two - More stringent regulation for gambling premises such as facial recognition to be mandatory

Three - ATMs not to be located on premises where gambling is available

Four - Venues with pokies to be accountable for enforcing problem gambling regulations

Five - Need for a formal inquiry into the placement of pokies in low-income neighbourhoods

Six - That all forms of gambling are subject to tighter restrictions

One – Provision of adequate governmental funding to allow effective support of problem gamblers

NGOs and not-for-profit groups are best placed to support change in relation to harmful gambling but require adequate funding to ensure effective and consistent delivery. Funding scarcity has impacted service delivery for decades, and recent environmental factors (inflation, Covid-response) are putting increasing pressure on services.

NGOs need to be funded sufficiently to operate independently from the industry against which they advocate. In order to ensure wider service delivery, many organisations find they need to accept funding from exactly these gaming groups - described by some as “hush money” (McClure, 2013). A decision to decline funding from the groups causing gambling harm should not be one which NGOs need to make, and it is made more difficult through a lack of funding coming from elsewhere.

Recommendation: That sufficient funding be provided to gambling harm reduction groups to achieve their stated goals

Two – More stringent regulation for gambling premises such as facial recognition to be mandatory

The effectiveness of self-exclusion models in New Zealand would be enhanced by the requirement for facial recognition where electronic gaming machines are operated. Facial recognition removes human error, particularly where banned and self-excluded patrons are allowed to gamble. Facial recognition can also help staff to offer options to find support to problem gamblers. Gaming machine industry bodies have previously asked for funding to allow facial recognition software to be implemented - to date, the Ministry of Health has ruled this out due to concerns over the appropriateness of funding this project. NZCCSS believes that the most appropriate and ethical option in this situation is to fund efforts at reducing harm. Harm reduction is especially important as recent events have shown that human error precludes gambling venues from excluding self-excluded patrons in many cases.

Successive studies have shown that self-exclusion models from gambling have low efficiency (Gainsbury, 2004). Reductions of harm require societal conditions that recognise risk and act to address it. Placing the onus on the individual is an undue burden, they also need community to support their wellness.

Recommendation: NZCCSS recommends the imposition of more stringent regulation, including mandatory facial recognition technology for gambling premises.

Three – ATMs must not be placed on premises where gambling is available

The placement of ATMs inside spaces in which gambling occurs allows for easy access to pokies, furthering the likelihood of addiction.

Problem gambling, especially in pokies, is fuelled by the visual and auditory stimulation which accompanies playing (Schull, 2012). The sensory experience of pokies is engineered to both extend playing time, as well as to entice patrons from outside the allotted gambling area in. Risk increases where withdrawals of funds are universally accessible. Simple safety measures, such as requiring withdrawals via eftpos machines at the bar, can place the onus on staff to question the gambling habits of patrons, which the provision of ATMs does not allow for.

Current law stipulates that ATMs must not be present inside premises providing pokies. In practice, it's common for ATMs to still be available, but located on the outside of the premises. We would

suggest a blanket statement ensuring an either / or situation prevails. Either a premises has an ATM and not pokies, or has pokies and not an ATM.

Recommendation: NZCCSS recommends the placement of ATMs anywhere on premises providing gambling services be made illegal.

Four – Venues with pokies to be accountable for enforcing problem gambling regulations

As with other regulated and addictive commodities, the usage of pokies must be suitably regulated to reduce harm. While the possibility of significant fines is very real for venues which host pokies – up to \$5000 for venues and \$500 for excluded individuals entering gambling areas - the regulatory body which is responsible for imposing these fines is unclear.

This lack of clarity is demonstrated by the fact that neither the Gambling Commission nor the Department of Internal Affairs has taken responsibility for undertaking enforcement action (Morrah, 2022). We propose that the Department of Internal Affairs takes control of the regulation and enforcement of laws surrounding pokies, including the levying of fines.

Recommendation: NZCCSS recommends that the Gambling Commission take control of regulation of pokies facilities, with consistently significant fines for breaches of the law.

Five – We recommend that the Department of Internal Affairs begins a formal inquiry into the placement of pokies in low-income neighbourhoods

More than 60% of pokies venues are placed within the areas with the highest deprivation in Aotearoa (Malatest, 2021). High concentrations of pokie machines in low-income neighbourhoods perpetuates the cycle of harm initiated by colonisation.

The level at which protections of communities are required will need to increase exponentially if the contributing factors (such as access to factors contributing to addiction) are not addressed. In the meantime, the impetus behind the placement of pokies and other products which are detrimental to our most vulnerable communities must be the subject of inquiries and regulation.

Recommendation: NZCCSS asks that a formal inquiry into the placement of pokies facilities be initiated.

Six - We ask that all forms of gambling are subject to tighter restrictions

While pokies are the source of significant harm in our communities, we recognise that the access to the internet has opened other avenues for gambling. Currently, some banks are implementing self-exclusion policies for problem gamblers however this is not industry standard (Morrah, 2022).

Tighter restrictions are necessary to mitigate the harm that gambling can cause. We would urge the Department of Internal Affairs to work alongside banks to ensure that signs of problem gambling in the online space are recognised and addressed. We recommend that the government requires an option for self-exclusion from online gambling through all banks. We are aware that the Department of Internal Affairs is investigating the harms caused through online gambling, however we ask that the findings of this investigation are considered and actioned upon through legislation.

Recommendation: NZCCSS recommends a widening of scope to include online spaces

Tohutoro | References

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