



**Whānau Āwhina Plunket's Submission on the  
Class 4 Gambling (Harm Prevention and  
Minimisation) Regulations 2004**

April 2022



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whānau āwhina

## Whānau Āwhina Plunket

1. Whānau Āwhina Plunket is the largest Well Child Tamariki Ora provider delivering health and wellbeing support services to pēpi, tamariki under five and their whānau across Aotearoa. Our vision is '*Kotahi mano ngā rā hiki te oranga mā ngā tipuranga i roto i te hāporito*' - *In the first 1,000 days setting the path of wellness in our communities, for generation to come*<sup>1</sup>.
2. We see over 89% of all newborn pēpi, including 62% of Māori pēpi and have been supporting whānau for the last 114 years. We offer a range of support services from Well Child/Tamariki Ora health checks, parenting support including play groups, car seat installations and safety checks, injury prevention, as well as the Before School developmental assessments.
3. Whānau Āwhina Plunket has a stated goal, "By 2025 all Whānau Āwhina Plunket services will be delivered equitably". We are committed to upholding the principles of Te Tiriti o Waitangi<sup>2</sup> and provisions of the United Nations Convention on the Rights of the Child (Children's Convention). In 2020, released our *Te Rautaki Māori – Ngā Pae o te Harakeke*, founded in Te Tiriti o Waitangi principles. Te Rautaki Māori sets out the equity roadmap for Whānau Āwhina Plunket.
4. Gambling related harm affects problem gamblers and their whānau - an estimated 5 – 17 people are affected for every 1 problem gambler and the harm is felt by their whānau and community<sup>3</sup>. If the problem gambler is a parent<sup>4</sup>, their tamariki are exposed to social, cultural, and economic gambling-related harm at various levels (individual, familial and community).
5. Whānau Āwhina Plunket is a recipient of funding gained from community gambling venues. However, the lack of community funding available to apply for, compels us to compromise the values we hold to seek funding support from community gambling venues. In spite of this we strongly advocate for the protection of all tamariki and their whānau from gambling harm.

## General comments

6. Overall, Whānau Āwhina Plunket agrees with the general direction of the draft changes, which focuses on '*reducing harm in venues*'; '*reducing harm from pokie machines*'; and '*reducing harm through stronger compliance*'<sup>5</sup>.
7. Whilst it might not be the scope of the proposed regulation changes, a robust review of distribution of pokies and limit the number of Class 4 venues is necessary, especially in high

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<sup>1</sup> Whānau Āwhina Plunket (2021). *Whānau Āwhina Plunket Strategy 2021-2026*. Wellington, New Zealand.

<sup>2</sup> As defined for the health and disability system in Whakamaui: Māori Action Plan 2020-2025.

<sup>3</sup> *Māori Problem Gambling: Too many chances*. (2021). Ngā Pae o Te Māramatanga. <http://www.maramatanga.co.nz/project/m-ori-problem-gambling-too-many-chances>

<sup>4</sup> Walker, S. E., Abbott, M. W., & Gray, R. J. (2012). Knowledge, views and experiences of gambling and gambling-related harms in different ethnic and socio-economic groups in New Zealand. *Australian and New Zealand Journal of Public Health*, 36(2), 153–159. <https://doi.org/10.1111/j.1753-6405.2012.00847.x>

<sup>5</sup> *Reducing Pokies Harm Public Discussion Document 2022*. Department of Internal Affairs, Wellington, New Zealand. [https://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Reducing-Pokies-Harm/\\$file/Reducing-Pokies-Harm-Public-Discussion-Document.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Reducing-Pokies-Harm/$file/Reducing-Pokies-Harm-Public-Discussion-Document.pdf)

deprivation neighborhoods. The Public discussion document<sup>6</sup> acknowledges that gambling harm from pokies affect Māori, Pacific and socially deprived population groups more significantly than other groups. The ease of access to Class 4 gambling venues especially in the most deprived areas should be a cause for concern to us all.

8. We are particularly concerned for caregivers who can readily access gambling at Class 4 venues<sup>7</sup>. 'Secondhand' gambling harm has wide-ranging and long lasting impact on tamariki, such as experiencing child poverty, child neglect, and health risks<sup>8,9</sup>. The voices of tamariki are often not heard and rely on adults to advocate for them.
9. There is a need to include the voices of lived experience (as a problem gambler and those affected by secondhand gambling) as well as with population groups most affected by gambling harm. It is important to consider the complexities of the groups, such as cultural and language barriers.
10. Whānau Āwhina Plunket strongly advocates for limited access to Class 4 gambling venues; tighten host responsibility regulations and stronger compliance and consequences to Class 4 venues regulations.

## Feedback on the proposed changes in the Regulation

### Part 1: Reducing harm in venues (identifying and responding to signs of harmful gambling, and better staff training)

11. We are pleased that 'a safety net approach' was used to set out options that can minimise gambling harm. We agree venues need to monitor the gambling area at set intervals to ensure patrons are not displaying signs of experiencing gambling harm.
12. Changing the venue design such as, opening hour restrictions, banning internal ATM services and restricting Class 4 gambling only to casino environments should be considered<sup>10</sup>. Venue design should be considered to prevent and minimise gambling harm. Risk factors for problem gamblers includes ease of access to ATM within a venue, various features of EGMs (electronic gambling machines) and extended opening hours.
13. Class 4 venues should be required to record a specified range of harm-related events and signs. Harm-related events or signs are known to impact individuals and their whānau including tamariki. If harm-related events are identified, venues have the ability to offer support and exclusion to problem gamblers.

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<sup>6</sup> Reducing Pokies Harm Public Discussion Document 2022. Department of Internal Affairs, Wellington, New Zealand. [https://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Reducing-Pokies-Harm/\\$file/Reducing-Pokies-Harm-Public-Discussion-Document.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Reducing-Pokies-Harm/$file/Reducing-Pokies-Harm-Public-Discussion-Document.pdf)

<sup>7</sup> PGF Group. (2019). *Gambling harm and children – fact sheet 7*. Retrieved from [https://www.pgf.nz/downloads/assets/13509/1/fs\\_11%20gambling%20harm%20and%20children%20sep%202019.pdf](https://www.pgf.nz/downloads/assets/13509/1/fs_11%20gambling%20harm%20and%20children%20sep%202019.pdf).

<sup>8</sup> Downs, C & Woolrych, R. (2010). *Gambling and debt: the hidden impacts on family and work life*. <https://doi.org/10.1080/13668803.2010.488096>

<sup>9</sup> Downing, N. (2014). The impact of gambling on families. Australian Gambling Research Centre.

<sup>10</sup> Jared Thomas, K. M., Grace Rive, John Haw, Paul Delfabbro, Jared Thomas. (2010). An Investigation of the Influence of Gambling Venue Characteristics on Gamblers' Behaviour. Retrieved from OPUS.

14. We also agree there should be no access to ATMs from inside a venue, only accessible outside. There is a strong relationship between problem gambling and use of ATM services. Locating ATMs inside venues increases access to money and can lead to impulsive gambling. Reducing the accessibility of ATM machines is an important modification for gambling harm minimisation<sup>11</sup>.
15. We support the requirement to pre-commit the amount of money or time gamblers intend to spend prior to gambling. One in six New Zealanders with gambling family members have gone without a necessity or a bill has been unpaid.<sup>12</sup> This requirement will reduce the likelihood of over-spending, which can affect a whānau's budget.
16. We also believe there should be tighter regulation and monitoring of self-exclusion by increasing people's awareness of the option of self-exclusion from venues to prevent financial problems, reduce gambling frequency, and increase quality of life for problem-gamblers<sup>13</sup>. This system is under-utilised by problem-gamblers. It is often seen as embarrassing, time-consuming, and breaching privacy and confidentiality. Overall, problem gamblers stated they weren't given adequate information on self-exclusion<sup>14</sup>.
17. Self-excused gamblers could be required to complete treatment before they can return to a venue. Treatment is necessary to reduce harmful gambling behaviours.<sup>15</sup> It also supports problem-gamblers to re-connect and focus on their whānau and tamariki, they may have experienced neglect.<sup>16</sup>
18. Whānau Āwhina Plunket supports standardised content for harmful gambling awareness training. We recommend:
  - a. All venue staff who supervise gambling be required to be trained to reduce the impact of gambling harm.<sup>17</sup>
  - b. Training to include identifying problem gamblers, supporting problem gamblers by offering pathways to seek help, or offer problem gamblers option to self-excuse.
  - c. Training venue staff to be able to approach a person gambling for a specified period of time (e.g. two hours).

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<sup>11</sup> The Responsible Gambling Council. (2021). *Responsible Gaming Features for ATMs and Accessing Money at Gaming Venues: An Impact Evaluation of Suppression Features on Automated Teller Machines (ATMs) in Gaming Venues*. Retrieved from <https://www.responsiblegambling.org/wp-content/uploads/TN-ATM-RG-Final-Report-Booklet-1-clean-004.pdf>

<sup>12</sup> PGF Group. (2019). *Gambling harm and children – fact sheet 7*. Retrieved from [https://www.pgf.nz/downloads/assets/13509/1/fs\\_11%20gambling%20harm%20and%20children%20sep%202019.pdf](https://www.pgf.nz/downloads/assets/13509/1/fs_11%20gambling%20harm%20and%20children%20sep%202019.pdf)

<sup>13</sup> Motka, F., Grüne, B., Slecza, P., Braun, B., Örnberg, J. C., & Kraus, L. (2018). Who uses self-exclusion to regulate problem gambling? A systematic literature review. *Journal of behavioral addictions*, 7(4), 903–916. <https://doi.org/10.1556/2006.7.2018.96>

<sup>14</sup> Gainsbury, S. M. (2014). Review of Self-exclusion from Gambling Venues as an Intervention for Problem Gambling. *Journal of Gambling Studies*, 30(2), 229-251. doi:10.1007/s10899-013-9362-0

<sup>15</sup> PGF Group. (2019). Problem gambling and mental health – Fact Sheet 12. Retrieved from [https://www.pgf.nz/downloads/assets/13510/1/fs\\_12%20problem%20gambling%20and%20mental%20health%20sep%202019.pdf](https://www.pgf.nz/downloads/assets/13510/1/fs_12%20problem%20gambling%20and%20mental%20health%20sep%202019.pdf)

<sup>16</sup> PGF Group. (2019). *Gambling harm and children – fact sheet 7*. Retrieved from [https://www.pgf.nz/downloads/assets/13509/1/fs\\_11%20gambling%20harm%20and%20children%20sep%202019.pdf](https://www.pgf.nz/downloads/assets/13509/1/fs_11%20gambling%20harm%20and%20children%20sep%202019.pdf)

<sup>17</sup> Te Hīringa Hauora/Health Promotion Agency. (2016). *Gambling Host Responsibility: Guide for Venue Staff*. Retrieved from <https://media.nzct.org.nz/documents/Gambling-Host-Responsibility-Guidance-HPA.pdf>

## Part 2: Reducing harm from pokie machines (changes to machine features that could make them safer)

19. Whānau Āwhina Plunket agrees that pokie machines should be required to display more information, such as the return to player, ratio of games, volatility of games, and harm minimisation. This would support responsible gambling and providing consumers with information to make less harmful decisions.
20. Pop-up messaging has shown it could be an effective tool to reduce harmful gambling behaviours.<sup>18</sup> Providing messages with advice on setting time or money limits, actual odds of winning, and desirability of taking a break from EGMs can reduce time spent gambling and/or expenditure.<sup>19</sup>
21. We recommend pokie machines are designed less appealing by making modifications to the visual and sound effects. Currently, pokie machines are designed to appeal to different people, drawing their attention with themed visuals and sounds, for example, motor racing or fantasy<sup>20</sup>. Removing such aspects of the pokie machines would reduce the thrill people get from gambling on these machines.

## Part 3: Reducing harm through stronger compliance (penalties and enforcement)

22. We support having stronger compliance for:
  - i) “failing to meet requirements in regard to... providing information about problem gambling to patrons and where to get help” (an existing requirement) with an infringement fee of \$1,000.
    - This is a host responsibility; the license holders should face consequences if they do not support problem gambling in patrons.
    - One in three pokie machine players experience harm as a result of their gambling. This puts emotional and financial stress on an individual and their whānau<sup>21</sup>
  - ii) “failing to meet requirements in regard to... required components of problem gambling awareness training to staff who supervise gambling” (an existing requirement) with an infringement fee of \$1,000.
    - Societies are responsible for pokies machines and should be made responsible for harm minimisation from these machines.
    - It is important that staff are familiar with signs of harmful gambling to be able to intervene and support gamblers<sup>22</sup>.

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<sup>18</sup> Bjørseth, B., Simensen, J. O., Bjørnethun, A., Griffiths, M. D., Erevik, E. K., Leino, T., & Pallesen, S. (2021). The Effects of Responsible Gambling Pop-Up Messages on Gambling Behaviors and Cognitions: A Systematic Review and Meta-Analysis. *Frontiers in Psychiatry, 11*. doi:10.3389/fpsy.2020.601800

<sup>19</sup> Livingstone, C., Rintoul, A., & Francis, L. (2014). What is the evidence for harm minimisation measures in gambling venues? *Evidence Base Journal ANZSOG, 2014*. doi:10.21307/eb-2014-002

<sup>20</sup> Safe Gambling Aotearoa. (2022). *How pokies work*. Retrieved from <https://www.safergambling.org.nz/know-your-odds/how-pokies-work>

<sup>21</sup> Te Hiringa Hauora/Health Promotion Agency. (2016). *Gambling Host Responsibility: Guide for Venue Staff*. Retrieved from <https://media.nzct.org.nz/documents/Gambling-Host-Responsibility-Guidance-HPA.pdf>

<sup>22</sup> Te Hiringa Hauora/Health Promotion Agency. (2016). *Gambling Host Responsibility: Guide for Venue Staff*. Retrieved from <https://media.nzct.org.nz/documents/Gambling-Host-Responsibility-Guidance-HPA.pdf>

- iii) “failing to meet requirements in regard to monitoring and recording harm minimisation actions” (a proposed new requirement) with an infringement fee of \$1,000.
  - Venue operators/managers need to actively identify problem gamblers in order to provide them with support for harm minimisation.
  - Harm minimisation involves a range of strategies and is integral to identifying harm and reducing it.<sup>23</sup>
  
- iv) “failing to meet requirements in regard to harm minimisation machine features” (a proposed new requirement) with an infringement fee of \$1,000.
  - Harm minimisation machine features are reported to reduce gambling expenditure and contribute to supporting problem-gamblers mental health, whānau and tamariki.<sup>24</sup>

## Conclusion

- 23. Impact of Class 4 gambling harm on tamariki are harmful and long lasting. Tamariki are healthy and well when their whānau are healthy and well.
  
- 24. All whānau deserve to be supported in building healthy relationships with their tamariki. Whānau Āwhina Plunket advocates that all tamariki should be safe and protected from all forms of harm, always.

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<sup>23</sup> Livingstone, C., Rintoul, A., & Francis, L. (2014). What is the evidence for harm minimisation measures in gambling venues?. *Evidence Base: A Journal of Evidence Reviews in Key Policy Areas*, (2), 1-24.

<sup>24</sup> Livingstone, C., Rintoul, A., & Francis, L. (2014). What is the evidence for harm minimisation measures in gambling venues? *Evidence Base Journal ANZSOG*, 2014. doi:10.21307/eb-2014-002