



waves

Waitakere Anti-Violence Essential Services

WAVES Trust

p: (09)838 4834 e: administrator@waves.org.nz f: (09)838 4835 www.waves.org.nz
7 Henderson Valley Rd, Henderson Post: PO Box 121450, Henderson, Waitakere 0650

Committee Secretariat Select Committee

Submission on the Gambling (Gambling Harm Reduction) Amendment Bill

Submitted by:

WAVES Trust
PO Box 12-1450
Henderson
Auckland 0650

Contact:

Poto Williams
Manager
09 838 4656(bus)
manager@waves.org.nz

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We wish to speak with the Select Committee about our submission if that is possible

WAVES Trust is an interagency family violence (FV) network organisation. The membership is primarily government and non-government service providers who work in the area of FV. There are also members who are not specifically FV agencies but their work complements or supports efforts to reduce violence in Waitakere. Currently there are over 50 agencies receiving information and support from WAVES Trust.

We are committed to strengthening the work of those who support and inform victims of FV and those who hold offenders accountable and support them to make positive changes to their behaviour. WAVES acts to support and resource all member agencies to practice to the highest standards of integrity and professional ethics.

WAVES Trust provides:

- A networking forum to encourage and support statutory and community services to provide integrated and collaborative services to reduce FV
- Links to other organisations through the interagency network
- Community advocacy and representation on initiatives that target FV
- Information about best practice in FV intervention and support for the implementation of best practice

- Primary prevention, capacity building and education opportunities for those working to reduce FV
- Contract management of interagency projects and contracts
- Access to current, relevant research Monitoring of community initiatives such as the Waitakere Family Violence Court
- An overview of information deficits and initiation of local research

WAVES Trust is a charitable trust. Governance is vested in the Board chaired by trustee Waitakere Family Court Judge David Mather. There are 5 trustees including Judge David Mather, Penny Hulse (Auckland Council Deputy Mayor), Howard Dawson (CEO Man Alive), Steve Kehoe (NZ Police) and Tiaria Fletcher (Lifewise Family Services).

There are currently four staff members – a Manager, two part-time Coordinators, and an Administrator, as well as one contracted part-time Project Leader.

Summary

We acknowledge that WAVES Trust and many of the agencies in our network depend upon grants received from the proceeds of gambling and electronic gaming (pokie) machines to support our work.

We support the intention of the Bill to allow local authorities to be more responsive to community wishes around the granting and renewal of electronic gaming licenses, and to bring in measures to limit gamers' daily spending and put some distance between the financing of gaming and its actual performance.

Our submission below focuses on aspects of the Bill that we feel may not operate to reduce harm despite its intention to do so. We point out that the Bill impacts the practices of electronic gaming venues licenced under class 4 operators' licences but it does not appear to address electronic gaming conducted under casino licences. In order to reduce the harm imposed by pokie machines, all facilities with these machines should be operating under the same conditions. This omission in the Bill is of particular concern in light of the government's current support of a plan by SkyCity Casino to dramatically increase the numbers of pokie machines at their central city venue.

We recommend the Select Committee amend relevant sections of the Gambling Act to ensure that a proportion of the monies distributed to communities are spent on services/activities aimed at gambling harm reduction.

We recommend the Select Committee extend the amendments to class 4 operators' licences proposed in this Bill to cover electronic gaming machines located within casino environments, making casino pokie machines subject to the same licencing, income distribution, and spending restriction conditions as those under class 4 licences.

Submission

Waitakere or West Auckland, formerly known as Waitakere City, is the region to the west of Auckland Central bordered by the Rodney District in the north, Auckland City to the east and south. Waitakere is home to over 200,000 people. In the 2006 census the population was 59% Pakeha, 13% Maori, 15% Pasifika, 16% Asian.¹ Waitakere has a relatively low income population compared to New Zealand as a whole and 59% of its population live in the five most deprived deciles of the NZDep2001 index of deprivation (compared to 50% in the whole of New Zealand), with 34% of the population living in the top three most deprived socio-economic deciles.²

WAVES Trust is concerned about the concentration of electronic gaming machines in areas of high socio-economic deprivation, the increased vulnerability of Maori and Pasifika peoples to problem gambling, and the lack of community say in the granting of licences.³ Gambling-related harms to Waitakere families are key concern of many of our community agencies and problem gambling is one of the harmful behaviours contributing to family distress identified by agencies responding to family violence.

We must acknowledge, however, that the proceeds of gambling — including problem gambling — provides vital funding to organisations such as WAVES Trust and many others in our network. This situation creates a dilemma for services which aim to act in the best interests of their clients but rely on gambling funds to do this. For this reason we have limited our submission to discussing ways to improve the Bill in relation to its stated intention of ‘Gambling Harm Reduction’, focusing on two issues:

1. Requesting the inclusion of a requirement that a certain percentage of funds distributed from the proceeds of pokie machines be allocated to gambling harm reduction programmes if possible.
2. Requesting consistency in the Bill across range of licence types affecting electronic gaming (pokie) machines.

We support the implementation of the following clauses of the Bill:

Clause 4 Purpose

Clause 5 Interpretation, specifically the removal of racing activities from the definition of ‘authorised purpose’

Clause 6 (1) that 80% of funds derived be returned to the same local area from which they are collected (recognising that this may not be possible in all cases)

Clause 6 (2) use of player tracking devices and pre-commit cards

¹ Some may identify with more than one ethnic identity.

<http://www.stats.govt.nz/Census/2006CensusHomePage/QuickStats/AboutAPlace/SnapShot.aspx?type=ta&ParentID=1000002&tab=Culturaldiversity&id=2000006> (Accessed 20 June 2012).

² In this structure decile 1 describes the most affluent areas of New Zealand and decile 10 the most deprived. MSD, *Waitakere Community Report 2006*, Wellington, 2006, www.familyservices.govt.nz (Accessed 19 June 2012), pp.31–2.

³ Problem Gambling Foundation of New Zealand, *Gambling and Gambling Harm in New Zealand*, Auckland, 2011, p.6.

Clause 7 (1) (2) allowing territorial authorities to reduce the time licences may be held

Clause 8 requiring territorial authorities to develop class 4 venue policy

Recognising our Trust's vested interests in the distribution mechanisms of such funds we have chosen not to comment on Clause 10.

We suggest an amendment to the Bill in relation to:

Clause 9 that corporate societies must apply 80% of proceeds to the local area.

WAVES Trust refers to the intention of the Bill which is Gambling Harm Reduction and a recent survey conducted for Kaitahu in Invercargill which indicates that public sentiment leans towards the implementation of more education and support for pokie machine users.⁴ WAVES Trust recommends the Select Committee include in this clause the requirement that a certain percentage of gambling revenue should be allocated to gambling harm reduction initiatives and programmes, where these are available. We leave it up to the Committee to decide what wording would best achieve this purpose.

Facilitating Gambling Harm Reduction

Finally we wish to draw the Committee's attention to our concerns that the impact of this Bill as it stands may not achieve the aim of gambling harm reduction in the long term but rather shift the location of gambling from local gaming venues to venues controlled by casino licences, in the larger cities at least. For all their problems, the advantages of local gaming venues controlled by class 4 licencing requirements include the distribution of profits back to charities and the existence of a degree of social control both for individuals gaming within their own communities and the influence that local public sentiment may exert over the granting of licences.

It is our understanding that the provision of pokie machines under casino licences will not be subject to the changes aimed at reducing gambling harm in this Bill. More than half of electronic gaming machines in Auckland (1647 out of 3098, 53%) are located in the SkyCity Casino,⁵ which has indicated it intends to add another 500 machines in return for financing a convention centre. WAVES Trust fears that measures promoting responsible gambling in the suburbs at venues controlled by class 4 licences may have the unintentional consequence of encouraging gamblers to use less regulated casino sites.

WAVES Trust therefore suggests the Select Committee amend the Bill to ensure that all licencing of pokie machine venues (class 4 and casino venues) is consistent and that the profit distribution, responsible gambling measures and pre-commit cards, and community consultation on licencing be extended to casino licencees in relation to their provision of pokie machines.

We thank the Committee for their efforts on this Bill.

⁴ <http://kaitahu.maori.nz/Websites/kaitahuwebsite/Images/10.pdf> (Accessed 20 June 2012), slides 14–6.

⁵ Problem Gambling Foundation of New Zealand, *Facts and Figures – Auckland City*, http://www.pgfnz.org.nz/Uploads/PDFDocs/Auckland_City-Facts_and_Figures.pdf (Accessed 20 June 2012).