

**Submission to the Government Administration Select Committee on the
Gambling Amendment Bill (No 2)**

NCWNZ is an umbrella organisation representing 46 Nationally Organised Societies and National Members. It has 28 Branches throughout the country attended by representatives of those societies and some 150 other societies. It also has three satellite groups and three regional consultation groups. NCWNZ is representative of approximately 350,000 women, via its affiliated bodies. The function of NCWNZ is to work for the well-being of women, the family and the community at local, national and international levels through research, study, discussion and action. This submission has been prepared by the Social Issues Standing Committee in consultation with the membership and with input from the NCWNZ Board and Parliamentary Watch Committee. We are pleased to be able to make this submission as we have with the past Gambling Bills.

Many of the members of the NCWNZ feel that the Bill 'Minimizing Gambling Harm' has not had the effect that had been hoped for, in clawing back the harmful effects of gambling. Therefore members would like to see a greater responsibility on the part of operators, and stricter monitoring and accountability of venues.

NCWNZ has chosen just to reply to Part 3 of this Bill which amends provisions to harm prevention and minimisation.

Clause 80 which requires the development of policy for identifying problem gamblers amends Section 308, which requires not only that Class 4 venue licence holders or casino operators develop a policy for identifying problem gamblers, but also that *a person acting on behalf of either of these persons*, be responsible for acting on this policy. Members agree that this is essential as many larger gambling establishments would have a number of persons 'acting on behalf of' and they also need to bear the responsibility the position carries.

Members also note that **Clause 83 dealing with the issuing of exclusion orders to self-identified problem gamblers** amends Section 310 to give the same power to those 'acting on behalf of' a venue manager or the holder of a casino operator's licence in regard to issuing exclusion orders on problem gamblers who ask for themselves to be banned from a gambling venue. If someone else is employed to carry out the work of the licence holder while they are absent, then that person must also have full authority to make sure all laws regarding gambling are upheld.

NCWNZ feels that **Clause 84** New Section 312 (4) (a) (b) (c) allows far too many ways in which the defendant can avoid prosecution. It would be doubtful that anyone would be prosecuted under these terms. Also members expressed concern at the fine being set so low in subsection (5 (b)). They suggested that this should not be altered from \$10,000 to \$5000.

Clause 85. New Section 312A (a) concerns keeping records of all 'Excluded Persons' including

- (i) the person's name and address
- (ii) whether the person was excluded from the venue under sections 309/310
- (iii) the date on which the exclusion order was issued and the date of its expiry
- (iv) any conditions imposed on the person's re-entry to the venue

(b) and to provide the record to the Secretary if requested by the Secretary.

Members thought that these lists should also be sent to the Secretary at regular intervals, eg every second month. As problem gambling results in dreadful social and economic problems, the Secretary should be responsible for having a national list of these people so that Government has access to when, and where, the biggest problems occur. It was felt that there was no point in keeping a list if it never going to be seen unless specifically requested by the Secretary.

Clause 86, (6), Section 313 (1) (g) is amended to restrict or prohibit the advertising of gambling, gambling delivery mechanisms, gambling venues, gambling prizes, or to prescribe codes requiring such advertising to be responsible. Members believe that the only option should be prohibiting the advertising. Responsible codes are open to be breached and as a consequence the standards NCWNZ feels should be upheld would be lowered.

NCWNZ is pleased to have had the opportunity to make this submission, because although it is realised that many gambling venues keep sports and other community groups in funds, this good has to be weighed against the cost to the community of problem gambling.



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