

**Gambling Venues Policy
Wellington City Council**

The Salvation Army New Zealand Fiji and Tonga Territory Submission

BACKGROUND

1. The Salvation Army is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society.
2. We have over 90 Community Ministry centres and Churches (Corps) across the nation, serving local families and communities. We are passionately committed to our communities as we aim to fulfil our mission of caring for people, transforming lives and reforming society through God in Christ by the Holy Spirit's power.¹
3. This submission has been prepared by the Social Policy and Parliamentary Unit. The Social Policy Unit works towards the eradication of poverty in New Zealand by encouraging policies and practices that strengthen the social framework.
4. This submission has been approved by Commissioner Robert Donaldson, Territorial Commander of The Salvation Army's New Zealand, Fiji and Tonga Territory.

¹ <http://www.salvationarmy.org.nz/our-community/mission/>

THE SALVATION ARMY PERSPECTIVE

The Salvation Army Problem Gambling Services:

5. The Salvation Army Oasis Problem Gambling Service was established in New Zealand in June 1997 in response to growing evidence that the considerable influx of gambling opportunities had a negative social impact on society. Since then the numbers of clients seeking help for gambling related problems has increased dramatically resulting in an expansion of our services across six major cities as well as satellite clinics throughout the country. We have a client base of approximately 2500 people.
6. The services we deliver are aimed at preventing and minimising gambling harm. We offer free accessible high quality client centred face-to-face counselling support and intervention for gamblers, their families and affected others. In addition, The Salvation Army delivers health promotion to minimise gambling harm in communities.

The Salvation Army Perspective:

7. The Salvation Army has persistently been engaged with the Government around gambling related harm. We continue to contend that one of the key focuses of the Gambling Act 2003 should be, as per section 3(b) of the Act, to *prevent and minimise the harm caused by gambling*. We submit that the Government and local Councils should make harm reduction a key focus of all gambling legislation and policy reforms they undertake.
8. As a provider of services to those affected by gambling harm, The Salvation Army sees the detrimental affects that problem gambling has on the wellbeing of whanau and communities around New Zealand. Aspects of the social climate created by gambling include significant harms caused in relationships, mental health and wellbeing, as well as unsustainable levels of debt. There are links between problem gambling and domestic violence and a correlation between child neglect and abuse. In relation to crime in our communities, one in every four male prisoners and one in every three female prisoners are likely to have a problem with gambling. Studies also indicate that in New Zealand and Australia that gambling is the most common motivator of fraud – with an average value of \$1.1 million per incident.

9. The Salvation Army is particularly concerned with Class 4 gaming machines, as these machines have been shown to induce the most harm. Class 4 gaming machines are also known as electronic gaming machines or pokies. The literature advocates for a number of practices to minimise and prevent problem gambling - one of the most effective and successful strategies involves limiting access to Class 4 gaming machines.

The Salvation Army perspective on the Wellington City Council policy proposals:

10. Overall, The Salvation Army opposes the policy recommendations offered by Council. We consider the proposals are significantly lacking. Wellington City Council has the legislative power and authority to be much more proactive in relation to gambling harm reduction. This significant power granted to local Councils comes from the Gambling Act 2003 where local authorities are charged with and enabled to control the growth of gambling, and prevent and minimise the harm caused by gambling. The Salvation Army encourages the Council to be more proactive in reducing gambling harms by adopting the recommendations outlined in this report.

Submissions in response to policy recommendations:

11. *Wellington Council Policy Recommendation: Continue to place maximum limits on the number of machines in most geographic areas. As with the existing policy, no limit would apply in the central city area.*

- a. The Salvation Army does not believe maximum limits are sufficient to reduce gambling harm. We strongly encourage the Council to adopt a Sinking Lid policy.
- b. A Sinking Lid Policy with a no relocation clause would ensure no new licenses for gaming machines could be issued, and gaming machines could not be transferred to new venues. The impact would reduce the number of Class 4 venues slowly over time. Maximum limits do not reduce numbers.
- c. We submit that the current policy of limitless Class 4 gaming machines in the Central Business District (CBD) needs to be changed. The Salvation Army contends that there is no valid reason that the people of Wellington central should have unrestricted access to Class 4 gaming machines. To follow this policy does not meet the requirement to prevent and minimise gambling harm.
- d. We are concerned about increased access of Class 4 gaming machines to visitors to Wellington central and also the workers who come into the CBD for employment.
- e. For workers, susceptible to the impact of gambling harm, increased access to Class 4 gaming machines creates a gambling environment within close proximity to their workplaces, and sometimes within workplaces.
- f. The Salvation Army encourages Wellington to be the cultural capital of New Zealand. We believe the central business district is one of the key areas to showcase our culture. Class 4 machines do not enhance this culture.

12. *Wellington City Council Policy Recommendation: Lower the maximum limits that were established in the 2010 Policy so that no more than two further venues can be established in any zone. In practice this means the new limits would be the lesser of: the existing number of NCGMs in an area plus 18; or the current cap.*

- a. We applaud the Council's move to lower the maximum limits, but we submit that this policy still fails to reduce gambling harm.
- b. We strongly advocate for Council to reduce harm reduction through the adoption of a Sinking Lid Policy.

- c. There are examples of other local Councils in New Zealand that have adopted a Sinking Lid Policy including two major cities, Christchurch and Auckland.

13. Policy Recommendation: *Allow venues to relocate and take their existing entitlement of machines with them, but only provided: they relocate to or within the central zone; or they relocate to or within an area identified as a “centre” in the Wellington District Plan; and the NCGMs at the new venue would not mean that any zone would be above its limit of machines.*

- a. We oppose this policy recommendation. We are not in favour of businesses being able to transfer their full quota of Class 4 machines to a new venue should they relocate.
- b. We encourage the Council to adopt a Sinking Lid Policy that has an emphasis on restricting venues being able to transfer entitlements. This will reduce the total number of Class 4 gaming machines over time and will be an effective and proactive way to reduce gambling harm in Wellington.

14. Wellington City Council Policy Recommendation: *Remove the requirement that only premises with an alcohol on-licence can be NCGM venues, but only where any NCGM venues without an on licence are located in “centres” identified in the Wellington District Plan.*

- a. The Council should not remove the requirement that only premises with an alcohol on-licence can be Non Casino Gambling Machine (NCGM) venues.
- b. The Gambling Act 2003 stipulates that gambling cannot be the primary business of the premises, and also requires that people under the age of 18 must not be allowed to participate in Class 4 gambling. While we agree that siting Class 4 gaming machines in licensed premises is not ideal, the intention was to protect young people. To argue that we need to widen the availability of Class 4 machines to additional venues which are not age restricted is a dangerous move, and would serve to normalise gambling. This policy would enable Class 4 machines to be placed in venues where younger (and much more vulnerable) people gather. Gambling harm seen in younger people is usually much harder to deal with, and because it occurs at a critical time in their development, can impact hugely on their whole of life outcomes.

15. *Wellington City Council Policy Recommendation: Retain the existing policy on Racing Board venues, meaning they may be established anywhere in the Wellington District, subject to the provisions of the Wellington City District Plan.*

- a. We submit that the existing policy on Racing Board venues should be changed. Racing Board venues should not be able to set up anywhere, but should be subject to restrictions as well.

The Salvation Army urges Wellington City Council to protect our most vulnerable communities

16. Gambling addiction can be found across all groups in society, but it is those groups at the lower end of the socio-economic spectrum that suffer most. Groups most likely to be in poverty and hardship include women, families, single parents, Maori, Pacific Island peoples, refugees, people with mental health issues, beneficiaries and people reliant on limited income.

17. Research illustrates some alarming statistics in relation to the location of Class 4 gaming machines in the most vulnerable communities. The Francis Group, in a 2009 report for the Ministry of Health, found that in poorer areas the ratio of Class 4 machines to people is one to 75, whereas in wealthy areas, the ratio is one machine to 465 people. The Salvation Army considers this to be inequitable and unjust. We consider that local Councils need to look closely at areas of residential deprivation and impose restrictions on the numbers of available machines in areas of high deprivation.

18. In Wellington our staff report that many Class 4 venues are situated in vulnerable communities, or are just outside, or on the margins of vulnerable communities. These vulnerable communities would be assisted by the adoption of a Sinking Lid Policy.

CONCLUSION

19. We submit that the primary way that Wellington City Council can reduce gambling harm in the community of Wellington is by regulating and limiting the use of Class 4 gaming machines.

20. We submit that the Wellington City Council needs to adopt the Sinking Lid Policy in all areas of the city.

This Submission has been written by The Salvation Army Social Policy and Parliamentary Unit.

We welcome the opportunity to present an oral submission to the Council.

For further information or discussion, please contact:

Major Campbell Roberts

Principal Advisor, The Salvation Army Social Policy and Parliamentary Unit

Phone DDI: 09 261 0883

Mobile: 0274506944

campbell_roberts@nzf.salvationarmy.org