

8 May 2023  
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**Re: Response to Professor Paul Delfabbro's letter**

Thank you for providing the opportunity to respond to Professor Paul Delfabbro's letter, dated 24th September 2022, addressed to the Gambling Commission concerning the matter of play duration and problem gambling indicators in casino venues.

Upon closely examining Professor Delfabbro's response, Asian Family Services found it necessary to consider the unique context of the gambling industry environment in New Zealand. This includes factors such as the population demographics within the two largest casinos in Auckland and Christchurch, as well as the broader economic, policy, social, and socio-political impacts that shape the nation's gambling landscape.

After reviewing the Skycity Casino's self-exclusion data by ethnicity in 2021 and 2022, it is apparent that Chinese individuals accounted for over 20% (while only representing 5.3% of NZ's population), Indian for 25% (4.7% of the population), Korean for 5% (0.75%), and Middle Eastern for 7% (less than 1%). These figures reveal that over 50% of self-exclusions were from the Asian demographic, even though they represent only 15% of the overall population. This raises the question of whether the study, which focuses primarily on Caucasian tertiary students, adequately considers the unique behaviours and experiences of the Asian population in relation to harm minimisation strategies.

Table 1: Skycity Self-Exclusion Data 2022

<b>Ethnicity</b>	<b>Self-exclusion %</b>	<b>New Zealand population %</b>
Chinese	20	5.3
Indian	25	4.7
Korean	5	0.75
Middle Eastern	7	0.5

For over 20 years, Asian Family Services has been dedicated to serving Asian communities, and during this time, the trends in gambling harm have remained largely unchanged. As the largest Australasian organisation of its kind, we have borne witness to numerous Asian clients who have lost their hard-earned life savings to gambling after migrating to New Zealand. Tragically, we have seen lives lost through suicide, attributable to severe problem gambling involving both the gamblers themselves and their loved ones. We have encountered relationship breakdowns, family devastation, financial ruin, decreased productivity, bankruptcy and countless heart-wrenching stories. The intergenerational trauma resulting from parents' problem gambling persists, and the cycle continues unabated.

Therefore, setting aside the arguments presented by the professor, it is crucial to genuinely question the evidence provided. At Asian Family Services, we understand that without a shift in indicators that

align with legislation and assess risk from early stages, there will be no significant change. Data analysis from the Health and Lifestyles Survey conducted over several years reveals that, after accounting for various socio-economic factors and gambling predictors, the risk of individual gambling harm for Asian people is 9.5 times higher compared to European/Other populations. To put it simply, this means that they are 950% more likely to develop severe problem gambling issues. Asian Family Services strongly recommends considering these factors in any future policy discussions and decision-making.

Hence, we wish to emphasise the importance of considering cultural factors in addressing harmful gambling, as highlighted by the conceptual framework published by Gambling Research Exchange Ontario<sup>1</sup>. Cultural factors, including ethnicity, traditions, socio-cultural attitudes, religion, and belief systems, have a significant influence on gambling behaviour and harmful gambling. Within and across different cultural groups, the functions and meanings of gambling may vary, with certain cultural values either increasing or decreasing the risk of harmful gambling. For example, some cultures might emphasize wealth possession and display, while others may consider gambling shameful, which can affect attitudes and behaviours related to gambling.

Immigrant and foreign-born populations may experience higher rates of harmful gambling due to cultural beliefs about luck, fortune, and destiny, as well as challenges faced in the acculturation process and adapting to life in the host country. Factors such as feelings of discomfort, perceived loss of social status, altered family roles, and experiences of exclusion and discrimination can contribute to increased harmful gambling risk.

It is essential to acknowledge and address these cultural factors to develop effective policies and interventions to tackle gambling harm in diverse communities. By taking into account the unique experiences of migrants and the influence of cultural factors, the Gambling Commission can create and implement strategies that cater to the needs of all affected populations. This culturally sensitive approach will enable better support for individuals and communities at risk for harmful gambling, ultimately promoting a more inclusive and equitable response to this complex issue.

Asian Family Services emphatically recommends that the Gambling Commission undertake a comprehensive, evidence-based independent review, carried out by researchers who have no association with or influence from the gambling industry. This review should concentrate on the obligation to incorporate the New Zealand *Ti Tiriti o Waitangi* within its context, ensuring a culturally sensitive and responsive approach that acknowledges the unique experiences of different communities and upholds the principles of the treaty.

Independent research funding is essential in establishing objectivity, credibility, and ethical integrity in gambling harm studies. It fosters a comprehensive understanding of the issue and informs evidence-based policy development while encouraging collaboration among stakeholders, ultimately leading to more effective prevention and intervention strategies.

Independent funding guarantees unbiased, transparent, and trustworthy research findings, instilling greater confidence in the outcomes and recommendations presented. This approach also allows researchers to explore a wide range of topics, even those that may not align with the gambling industry's interests, ensuring a thorough examination of the subject matter.

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<sup>1</sup> Gambling Research Exchange Ontario. (2018). *Conceptual Framework of Harmful Gambling: An international collaboration 3<sup>rd</sup> Ed.* Cultural Factors.

Furthermore, independent research funding emphasises the importance of prioritising public health and harm reduction over industry profits, ensuring that the research conducted adheres to ethical standards. By upholding these principles, independent research can garner the trust and confidence of the public, policymakers, and various stakeholders involved in addressing gambling-related harm. Asian Family Services strongly urges the Gambling Commission to align its views with the Pae Ora (Healthy Futures) Act 2022. Pae Ora encourages everyone in the health and disability sector to work collaboratively, think beyond narrow definitions of health, and provide high-quality and effective services. Pae Ora is a holistic concept encompassing three interconnected elements: mauri ora (healthy individuals), whānau ora (healthy families), and wai ora (healthy environments).

On top of that, we recommend considering the Mental Health and Wellbeing Commission's He Ara Oranga wellbeing outcomes framework. The Oranga Hinengaro System and Service Framework of Mental Health now include minimising and preventing gambling harm, which has not been previously addressed.

As a gambling harm treatment provider, we urge the Gambling Commission to adopt a wider perspective aligned with the overall New Zealand government's latest health legislation and strategic direction for harm minimisation. We want to see enforcement that governs the behaviour of individuals, organisations, and entities within a jurisdiction, protecting the rights and interests of citizens and promoting the general welfare of society. Asian Family Services also emphasises the importance of promoting fairness and equality in addressing gambling harm and implementing prevention and intervention strategies.

By incorporating these broader health and wellbeing frameworks into the Gambling Commission's approach, we can work together to create a more comprehensive, effective, and inclusive response to gambling harm that benefits individuals, families, and communities across New Zealand.

In summary, Asian Family Services urges the Gambling Commission to consider several key points in addressing gambling harm:

- Recognise the significant role of cultural factors in shaping gambling behaviour and the extent of harmful gambling, including ethnicity, traditions, socio-cultural attitudes, religion, and belief systems.
- Commission a comprehensive, evidence-based independent review, conducted by researchers not associated with or influenced by the gambling industry, with a focus on incorporating the New Zealand Ti Tiriti o Waitangi context.
- Align with the Pae Ora (Healthy Futures) Act 2022 and the Mental Health and Wellbeing Commission's He Ara Oranga wellbeing outcomes framework to promote a holistic approach to harm minimisation, encompassing mauri ora (healthy individuals), whānau ora (healthy families), and wai ora (healthy environments).
- Emphasise the importance of independent research funding to maintain objectivity, credibility, and ethical integrity, enabling a comprehensive understanding of gambling harm, evidence-based policy development, and collaboration among stakeholders.
- Adopt a wider perspective aligned with the New Zealand government's latest health legislation and strategic direction, promoting fairness and equality in addressing gambling harm.

By incorporating these recommendations, the Gambling Commission can develop a more comprehensive, effective, and inclusive response to gambling harm that benefits individuals, families, and communities across New Zealand.

Thank you again for the opportunity to submit this matter. Please contact us if you have any questions regarding this submission.

Ngā mihi nui,



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