

**Submission to:**

Department of Internal Affairs

Subject:

Discussion Document: Review of Class 4 gambling

Date:

8 August 2016

Contact Person:

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Background

Citizens Advice Bureau New Zealand Ngā Pou Whakawhirinaki o Aotearoa welcomes the opportunity to comment on the Discussion Document: Review of Class 4 gambling. We do so on behalf of all CABs.

The purpose of our organisation is to:

- Ensure that individuals do not suffer through ignorance of their rights and responsibilities or of the services available; or through an inability to express their needs effectively — Me noho matāra kia kua te tangata e mate i tāna kore mōhio ki ngā āhuatanga e āhei atu ana ia, ki ngā mahi rānei e tika ana kia mahia e ia, ki ngā ratonga rānei e āhei atu ana ia; i te kore rānei āna e āhei ki te whakaputu i āna hiahia kia mārama mai ai te tangata.
- Exert a responsible influence on the development of social policies and services, both locally and nationally — Kia tino whai wāhi atu ki te auahatanga o ngā kaupapa-ā-iwi me ngā ratonga-ā-rohe, puta noa hoki i te motu.

We support the principle of partnership reflected in the Treaty of Waitangi. E tautoko ana Ngā Pou Whakawhirinaki o Aotearoa i te mātāpono o te pātuitanga e ai ki Te Tiriti o Waitangi.

We work to empower individuals to resolve their problems and to strengthen communities. The person-to-person service provided by over 2,400 Citizens Advice Bureau (CAB) volunteers is unique in New Zealand. From 83 locations around New Zealand, the CAB provides individuals with a free, impartial and confidential service of information, advice,



advocacy and referral. Ka mahi mātou ki te whakakaha i ngā tāngata takitahi ki te whakatika i ā rātou ake raruraru, ki te whakakaha hoki i ngā hapori. He mea ahurei i roto o Aotearoa te ratonga kanohi-ki-te-kanohi e whakaratohia e ngā kaitūao 2,400 o Citizens Advice Bureau (CAB). Mai i ngā takiwā e 83 puta noa i Aotearoa, e whakaratohia ana e te CAB ki ngā tāngata takitahi he ratonga koreutu, tōkeke, matatapu hoki e pā ana ki te mōhiohio, te tohutohu, te tautoko me te tukunga.

In the 2015/2016 financial year we had over 550,000 interactions with clients, including over 200,000 in-depth enquiries where we offered information, advice and support across the gamut of issues that affect people in their daily lives.

We use our experience with clients to seek socially just policies and services in Aotearoa New Zealand.

Introduction

- 1 This submission engages only with the penultimate question posed in the review discussion document - *are there issues or questions not set out in this discussion paper that you think need to be considered in this review?*
- 2 In answer, our organisation submits that the review has neglected to pose the most important question of all - the question of whether we in New Zealand should continue to fund community groups from the proceeds of Class 4 gambling.
- 3 We would like the Department to acknowledge this 'elephant in the room' by widening the terms of the current review of Class 4 gambling to include:
 - consideration of whether the practice of funding community groups from the proceeds of Class 4 gambling is fit-for-purpose
 - an investigation of other models for funding our community sector, with a view to identifying those that are both sustainable and ethically sound

The current model is flawed

- 4 Class 4 gambling proceeds have become an entrenched mechanism for funding community and voluntary sector organisations in New Zealand. Groups throughout the country, including CABs, have come to rely on this funding for their survival. Our organisation thinks it is time for this to change, and for us to explore healthier mechanisms for funding our community and voluntary sector.
- 5 The review tells us that “class 4 gambling comes with the highest risk of harm with respect to problem gambling compared with other forms of gambling” and at the same time it asks us to consider how we can “balance the need to minimise the harm from gambling with the desire to generate benefits to the community from gambling money”. We see this as an impossible balancing act, and one that we should stop trying to perform.
- 6 There is no justification for risking doing harm in order to be able to do good. There is no justification for accepting a certain level of harm in order to be able to do good.



- 7 Our opposition to the present funding model is in no way a criticism of the community organisations which benefit from it. What we object to is the fact that this model often puts community groups in the situation of having to choose between 1/ seeking funding from what they may regard as a morally reprehensible source and 2/ compromising their ability to do good in their community by not seeking that funding.
- 8 We believe it is wrong to put community groups in this position, especially when there are so few alternative funding sources available to them. In our view, the current funding model is not fit-for-purpose.

It is time to explore other ways of funding New Zealand's community sector

- 9 We think the way forward is to find ways of funding our community sector which are both sustainable and ethically sound.
- 10 To this end, we urge the Department to use this review of Class 4 gambling to carry out a thorough investigation of all other possible models for funding New Zealand's community and voluntary sector, including the possibility of funding the sector directly from the consolidated fund and via Vote Internal Affairs.

Summary of recommendations

- 11 CAB recommends that the Department widen the terms of reference of the current review of Class 4 gambling to include:
 - consideration of whether the practice of funding community groups from the proceeds of Class 4 gambling is fit-for-purpose
 - an in-depth investigation of other models for funding our community sector, with a view to identifying those that are both sustainable and ethically sound

Thank you for this opportunity to comment. Please contact me if you have any questions, or want any clarification about our submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kerry Dalton', written in a cursive style.

Kerry Dalton
Chief Executive