

31 May 2024  
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Executive Director  
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Auckland, 1052

### **Re: Application for Licence Renewal by Dunedin Casinos Limited**

Thank you for this submission opportunity regarding Dunedin Casinos Limited's application for licence renewal of the Grand Casino Dunedin.

Asian Family Services (AFS) is the leading organisation in preventing and minimising gambling harm for Asian communities, identified as a priority population in the Strategy to Prevent and Minimise Gambling Harm<sup>1</sup>. Over the past 20 years we have provided clinical counselling services for individuals affected by gambling harm, designed and delivered public health initiatives for communities at risk of gambling harm, and advocated for policies that reduce gambling harm for Asian New Zealanders.

AFS is not anti-gambling and we hold a **neutral** position regarding this licence renewal application.

However, we believe this is a timely opportunity to put forth our views focused on the applicant's Host Responsibility Programme (HRP) and Problem Gambler Identification Policy (PGIP).

We believe the issues raised below are valid with evidence, and the recommendations will lead to a more robust and effective HRP and PGIP. This contributes to creating safer gambling environments for whānau Asian and helps to reduce gambling harm.

#### **The current state**

1. Asian New Zealanders remain disproportionately at risk to experiencing gambling-related harm – around 9.5 times more compared with the general population.
2. Despite this, Asian New Zealanders continue to face significant barriers in accessing help and support resources.
3. This is due to a combination of social-cultural factors driving a set of unique needs, and gaps in our existing system to address them;
  - a. these factors include stigma, taboo, shame, lack of awareness and limited education around gambling-related harm, and
  - b. the gaps include limited cultural and linguistic competency across where gambling harm prevention and minimisation activities are carried out, including (but not limited to) casino venues.

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<sup>1</sup> "Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25." n.d. Ministry of Health NZ.  
<https://www.health.govt.nz/publication/strategy-prevent-and-minimise-gambling-harm-2022-23-2024-25>.

4. Relevant to this application, Asians are also known to prefer casino-based gambling<sup>2,3,4</sup>.
5. We commend the Grand Casino Dunedin for their ongoing engagement with AFS, and we note a thoroughly documented HRP and PGIP, with some efforts to consider cultural differences.
6. However, we do continue to advocate for an HRP and PGIP which openly recognise the unique vulnerability of Asian gamblers.
7. We believe a robust HRP and PGIP which explicitly presents the unique needs of Asian gamblers and specifically articulates how they would be addressed will further enable Dunedin Casinos Limited's fulfilment of the Gambling Act in protecting vulnerable individuals and communities from the negative consequences associated with gambling.
8. Ultimately, this will meaningfully contribute to reducing gambling harm and the risk of gambling harm among Asian gamblers and their whānau – an outcome which benefits everyone.

### The key issues

1. The current HRP and PGIP, overall, has a generalised approach in guiding the casino's harm reduction activities which, by definition, does not take into account the unique vulnerability of Asian gamblers.
  - a. In the form of language requirements for certain contexts, it does make implicit references to cultural differences, but
  - b. effective approaches need to go beyond this basic (but required) consideration.
2. Asian gamblers at the Grand Casino Dunedin will not effectively receive activities and their desired benefits stipulated in the HRP and PGIP to the same extent as others, which will perpetuate their unique vulnerability to gambling harm.
3. In turn, this leads to a delayed or totally missed opportunities to intervene earlier and utilise referral pathways.

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<sup>2</sup> Oei, T. P., & Raylu, N. (2009). Gambling behaviours and motivations: A cross-cultural study of Chinese and Caucasians in Australia. *Cultural Diversity and Ethnic Minority Psychology, 15*(4), 309-319.

<sup>3</sup> Raylu, N., & Oei, T. P. (2004). Role of culture in gambling and problem gambling. *Clinical Psychology Review, 23*(8), 1087-1114.

<sup>4</sup> Blaszczynski, A., Huynh, S., Dumlao, V. J., & Farrell, E. (1998). Problem gambling within a Chinese speaking community. *Journal of Gambling Studies, 14*(4), 359-380.

## Our recommendations

1. Include an explicit acknowledgment of the unique needs of Asian gamblers (and other vulnerable groups) in the HRP's Position Statement, Objectives and PGIP, guiding the specific policies and procedures that follows to naturally and sustainably address these needs over time.
  - a. As an example, this may include updating problem gambling Indicators, Sources of Indicators, and Consequences of Identification that better enables casino staff to identify Asian gamblers at risk. In tandem, it could also mean articulating how cultural competency training will be conducted with new and maintained with existing Authorised Persons.
2. Develop an intentional procedure to build and utilise culturally appropriate pathways (such as with AFS) to minimise missed opportunities for Asian gamblers at risk in receiving early intervention<sup>5</sup>.
3. Indicate in the HRP how barriers can be reduced for concerned whānau (who face similar linguistic and cultural challenges) of Asian gamblers so that they can effectively communicate about signs of gambling harm.
4. Update the treatment provider list to include AFS.
5. Remain committed to developing culturally and linguistically appropriate resources.
6. Remain committed to the ongoing learning about the needs of Asian gamblers and culturally appropriate ways to address these through consultation with AFS.

We look forward to our continued engagement with Dunedin Casinos Limited and collaborating on efforts to reduce and prevent gambling-related harm for Asians gamblers at the Grand Casino Dunedin.

Thank you again for this submission opportunity – please get in touch with us if you have any questions.

Ngā mihi nui,

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<sup>5</sup> Early intervention is often more effective and less resource-intensive compared with clinical treatments for severe gambling harm consequences, reducing overall system burdens.