



Te Tari Taiwhenua
Internal Affairs

Te Kāwanatanga o Aotearoa
New Zealand Government

Reducing Pokies Harm

Public Discussion Document



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Message from Hon Jan Tinetti

Minister of Internal Affairs

Tēnā koutou, tēnā koutou, tēnā koutou katoa.



Reducing the harm pokies are causing in our communities is something I care deeply about.

Pokies are the most harmful form of gambling in Aotearoa New Zealand. One in five pokie players are considered at-risk gamblers.

Gambling harm presents a widespread risk but tends to affect those who can least afford it. This includes our Māori and Pacific communities, who may already be experiencing financial or social challenges.

There are gaps and ambiguities in gambling harm regulations for pokies and change is needed. I am keen to hear your views on whether the regulations could be strengthened to set clear expectations for both gambling operators and the regulator to ensure harm minimisation rules are understood and being followed.

We need to make a start on addressing problems within the gambling system. Making it safer for people who choose to gamble in pubs and clubs is the most urgent and most quickly-addressed part, and cuts straight to the core of the problem.

Strengthening regulations are not the only way that improvements could be made to the current system, but the Government can move fastest by using existing tools within the Gambling Act 2003 (the Act). This discussion document presents the key issues around reducing harm in venues, and some options for addressing them now, and in the future. It proposes being more prescriptive about the harm minimisation measures pubs and clubs need to have in place, such as identifying and excluding people experiencing harmful gambling, better training of staff, limiting access to money in venues, and how pokie machines themselves operate.

I want to open a conversation with you about what you think is important and what we can achieve. Over the next few months, my officials will be seeking the opinions of a wide range of New Zealanders about how we can reduce gambling harm from pokie machines in pubs and clubs.

Although consultation is open to anyone from the general public, I am particularly interested in hearing from people who have experienced harm from pokies, pokies gamblers who have not experienced harm, people affected by second hand gambling harm from pokies such as friends or family, people who treat those who have experienced harm from pokies gambling, pokie societies, clubs and venues and the people who work in them, and anyone else with an interest in pokies gambling.

I encourage you to take part. Make your voice heard.

Summary

This discussion document seeks public feedback on options for changes to the pokies (Class 4) Gambling (Harm Prevention and Minimisation) Regulations 2004, using regulation-making powers in the Act.

Gambling on pokies in New Zealand’s pubs and clubs is a source of gambling harm for some people. The current regulations aren’t as effective as they could be in addressing this harm, and the Government is considering a range of options to address this. Changes to the Act are out of scope.

Lessening the risk of harm for people who choose to gamble in pubs and clubs is the most urgent and easily-addressed action the Government can take. The Government is considering whether more comprehensive and stronger rules within venues will help reduce harmful gambling. Amending regulations can be done more quickly than changing the Act.

Options cover how harmful gambling could be prevented and minimised in venues by more explicit direction for venues and societies in regulations, potential technical changes to pokie machines and opportunities for more penalties and enforcement in regulations.

The Government is keen to hear what you think of the ideas for change described in this discussion document and any other suggestions you have.

This is the first stage of the Government’s steps to better prevent and minimise gambling harm in Aotearoa New Zealand. Other work includes the Online Gambling Review and the work underway led by the Ministry of Health to review the Strategy to Prevent and Minimise Gambling Harm.

The focus areas and key questions in this document

Part 1: Reducing harm in venues (identifying and responding to signs of harmful gambling, and better staff training)

- What changes are necessary to identify and stop harmful gambling in pubs and clubs?
- What further tools do staff need to help them identify harmful gambling?
- How could self-exclusion be used more effectively as a tool to prevent harmful gambling?
- How could training of staff be improved?

Part 2: Reducing harm from pokie machines (changes to machine features that could make them safer)

- Could changes to the features of a pokie machine help reduce harmful gambling? If so, what changes would be most effective?
- What changes could be made to prevent harm from jackpots?

Part 3: Reducing harm through stronger compliance (penalties and enforcement)

- What infringement offences and penalties could support new and existing regulations?
- What should venue managers / venue operators / societies be accountable for?

A submission form is provided at the end of the discussion document.

About Pokies

Gambling is a legitimate recreational activity for many, but it can cause harm for some people

Gambling is legal.¹ Seven in ten New Zealanders report having gambled in some way in the past 12 months.² Many people gamble for leisure or recreation and experience no harm. However, gambling is also a potentially harmful and addictive activity for a small but concerning number of people, especially if they already face other economic or negative health and lifestyle challenges in their lives.

The most common way people gamble in Aotearoa New Zealand is by buying a Lotto ticket (9.1%).³ 9.6% of New Zealand adults played pokies at least once in the last 12 months.⁴

How the pokies system works

In September 2021, there were approximately 14,704 pokie machines in 1,051 venues. 80% of these machines are owned by 33 corporate societies and hosted in public venues (pubs, hotels and bars). The remaining 20% are located in around 190 clubs (such as RSAs and Cosmopolitan Clubs) throughout the motu.

Corporate Societies, such as NZ Community Trust and Lion Foundation, own pokie machines, pay venues (pubs and clubs) to host machines, and also distribute proceeds to a range of sports and other community groups. They are required by law to return at least 40% of their GMP through community grants. Clubs primarily apply pokie proceeds to their own organisations. See **Appendix C** for an overview of the pokies system.

The community funding system is widely acknowledged to be inequitable. Evidence suggests that much of the community funding comes from gambling losses in our poorest neighbourhoods and from people experiencing gambling harm.⁵ We also know that community funding from pokies doesn’t always go back to the communities where the money was lost through gambling.

These systemic issues will be addressed in further work related to the gambling system. For now, the focus is on the best ways to reduce gambling harm occurring in pubs and clubs.

What are the current legal requirements to minimise harm for players?

One of the purposes of the Act is to prevent and minimise harm from gambling, including problem gambling.

- Harm minimisation requirements are set out in the Act and Gambling (Harm Prevention and Minimisation) Regulations 2004. These regulations cover:
- venues unsuitable for pokies
 - restrictions on ATMs
 - stake and prize limits
 - messages pokies must display
 - restrictions for jackpot advertising and branding

1 If authorised by the Gambling Act 2003, s 9.
2 69.3% of adults (16+) or 2.8 million New Zealanders. HLS 2020.
3 HLS 2020
4 HLS 2020
5 Results from the National Gambling Study estimate that Problem and moderate-risk gamblers account for around a quarter of total gaming machine expenditure and adults experiencing lower levels of gambling-related harm accounted for a further quarter. <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

- requirements to provide information about problem gambling
- requirements for problem gambling awareness training.

The Act defines a **problem gambler** as a person whose gambling causes harm or may cause harm. **Harmful gambling** is now a more widely-used term because it moves the onus to the system, rather than as an individual responsibility. **Harm** is defined in the Act as harm or distress of any kind, caused or exacerbated by a person’s gambling and includes personal, social or economic harm suffered by any person or society at large. **Harm from gambling is wide-ranging and can include:**

- damage to relationships, including neglect of dependents
- emotional and psychological distress
- disruptions to work or study
- financial distress and loss of income
- potentially fraud and related crimes
- family violence

The Act stipulates that corporate societies must ensure that the risk of problem gambling is minimised at all times. Corporate societies and Class 4 venue licence holders can have their licences suspended, cancelled, or not granted, if they don’t meet this requirement. See **Appendix B** for more details of current harm prevention and minimisation requirements.

The amount lost by New Zealanders on pokies is continuing to rise

Although the numbers of places where people can gamble on pokies are decreasing and the number of machines is also decreasing, the amount New Zealanders are spending is continuing to rise. New Zealanders are losing almost a billion dollars every year. Gaming Machine Profit (GMP)⁶ for 2019 was \$939 million. GMP for 2020 was less (\$810 million), because of a temporary dip during the COVID-19 lockdown. See **Table 1** for a year by year comparison of money lost by New Zealanders to pokies and community funding.

Diagram 1: Class 4 Gaming Machine Profits and Community Return – by Calendar Year

Year	Gaming Machine Profit (\$)	Community Return (\$)
2020	810,957,209	281,366,893
2019	939,075,488	345,496,261
2018	910,678,179	346,463,945
2017	883,384,865	329,220,907
2016	858,236,950	328,259,164

Pokies are electronic gaming machines in **pubs, clubs and in TAB NZ outlets**.⁷ They are referred to as **Class 4 gambling** in the Act. They are owned by corporate societies (also known as “pokie trusts” or societies), who are required by law to return at least 40% of their profit to the community. Societies also administer the grants system for community funding. See the section below for more about how this works. Pokies are particularly associated with significant gambling harm risk because winnings can **be rapidly reinvested**, and machines are designed to encourage **long periods of play**. They are associated with **high rates of gambling harm**.

6 GMP is the amount that gamblers pay into pokie machines, less total prizes paid out.
7 As part of Kia Manawanui Aotearoa – Long-term pathway to mental wellbeing the Gambling Act 2003 will be reviewed as a medium-

Harmful gambling

Gambling harm is commonly measured by the Problem Gambling Severity Index (PGSI), which is a standardised measure of at-risk behaviour in problem gambling. In 2018, about 4.5% of New Zealand adults self-reported some harm from their own gambling in the previous year.⁸ Gambling harm is widely believed to be underreported, in part due to the stigma felt.⁹

The key reasons for harm are the time spent gambling and the money lost. These affect people differently. While one person may be able to afford \$20 on gambling, for another it may mean going without basic grocery items that week. While someone may be happy and safe spending a couple of hours in front of a machine, for another that might take them away from caring for their children or other important responsibilities.

Problems may range from having arguments with family over the amount of money being spent on gambling, to problems involving a compulsive need to gamble resulting in major financial or inter-personal difficulties.

The Crown is obliged to take active steps towards equalising Māori outcomes for pokies gambling

Treaty of Waitangi principles oblige the Crown to take active steps towards ensuring that Māori do not experience disproportionate gambling harm.

Pokies are the most harmful form of gambling

Pokies are the most harmful form of land-based gambling in New Zealand. One in five pokie players are considered at-risk gamblers.¹⁰ Pokies are the main source of gambling harm reported by clinical intervention service users.¹¹

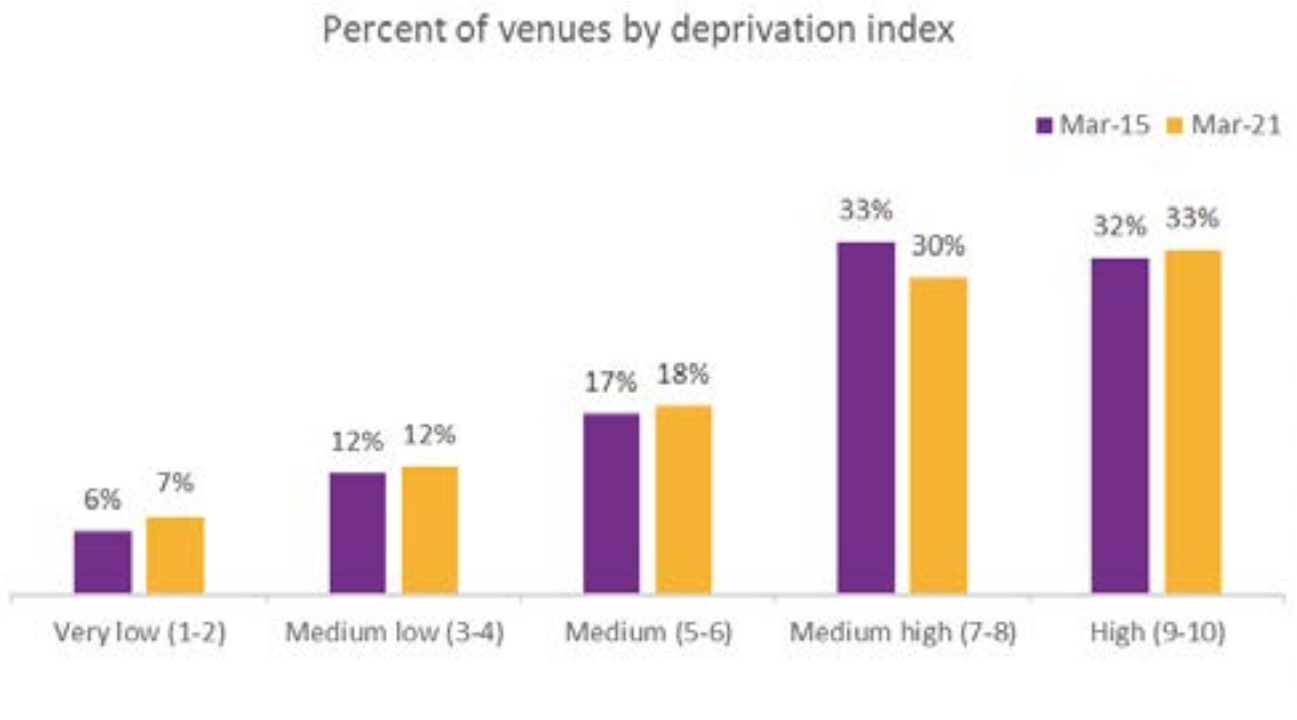
Pokies harm is widespread but tends to cause most harm to those who can least afford it

Pokie machines are more often located in communities with higher deprivation index levels (levels 7-10), than those with lower deprivation levels. See Diagram 1 for the proportion of pokie venues located in high deprivation index communities.

“Second hand” gambling harm has a wide-ranging effect

International evidence suggests that around seven other people can be adversely affected to varying degrees by a person experiencing severe gambling harm.¹² This shows that harm from gambling does not just affect the gambler, but also affects whānau, friends, and the wider community. The direct impacts can include neglect of dependents, financial and emotional distress. There is also strong correlation between gambling, and family, whānau or partner violence for women and children. Harm caused by gambling may also have broader economic effects, such as for employers and businesses due to lack of productivity or fraud.

Diagram 1: Proportion of pokie venues located in high deprivation index communities



This means that there is more exposure and access to pokies gambling, normalising gambling in communities who can least afford it and leading to gambling harm. For communities already facing other challenges, pokie machines can lead to – and/or compound – devastating health, social and financial challenges. This can particularly affect Māori and Pacific communities, who may already be experiencing financial or social challenges due to the effects of colonialism, institutional racism immigration, and marginalisation.

term objective including preventing and minimising harm from electronic gaming machines (pokies).

8 GMP is the amount that gamblers pay into pokie machines, less total prizes paid out.

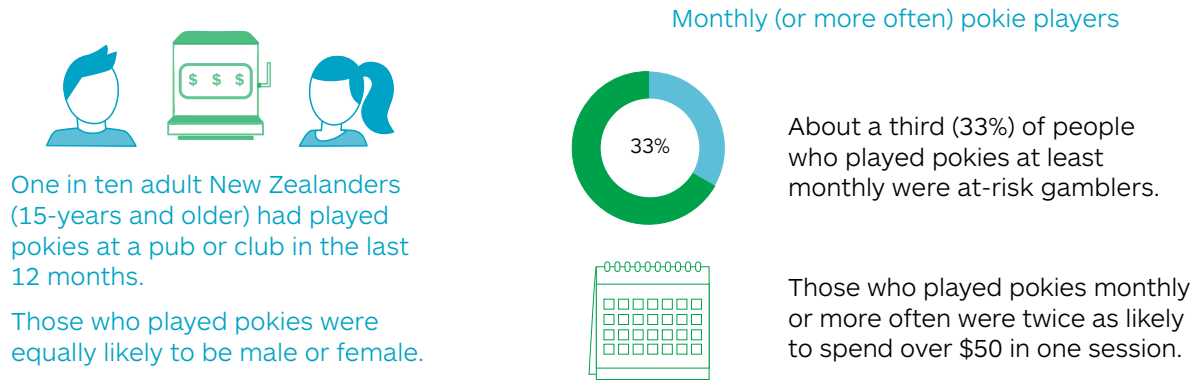
9 2020 Health and Lifestyles Survey. Broken down: 3.6% were categorised as low-risk gamblers, 1.9% were categorised as moderate-risk and problem gamblers.

10 The Ministry of Health’s current strategy is looking at how stigma from gambling harm can be reduced. <https://www.health.govt.nz/publication/draft-strategy-prevent-and-minimise-gambling-harm-2022-23-2024-25>

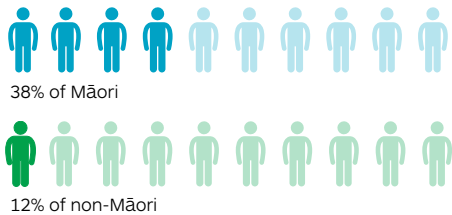
11 Productivity Commission 1999, Australia’s Gambling Industries, Report No. 10, AusInfo, Canberra. <https://www.pc.gov.au/inquiries/completed/gambling/report/gambling1.pdf>.

12 <https://www.health.govt.nz/our-work/mental-health-and-addiction/addiction/gambling/service-user-data/intervention-client-data#ppgm>

Pokies in pubs and clubs – participation, harm and spending
Results from the 2018 Health and Lifestyles Survey for past-year pokie gamblers in pubs and clubs.



Pokie players were more than twice as likely to be at-risk of some level of gambling related harm compared to other gamblers



Some level of gambling harm was experienced by 38% of Māori pokie players compared to 12% of non-Māori pokie players.

Notes:
¹PGSI – at-risk gamblers are those with any level of risk on the Problem Gambling Severity Index (PGSI; Ferris & Wynne, 2001). The 2018 Health and Lifestyles Survey (HLS) consisted of a sample of 2,725 New Zealand adults. Of these, 1,895 had gambled in the previous 12 months; 333 of them gambled on pokies at a pub or club. For a full description of the HLS methodology, questionnaire and further HLS publications, please visit [hpa.org.nz](https://www.hpa.org.nz). More results from the HLS are available at kupe.hpa.org.nz.

Strengthening the rules around how pokies can operate

So, why do regulations need to be strengthened?

The harm minimisation regulations for pokies could be improved to provide stronger mechanisms to help prevent people suffering gambling harm.

So, what's the real problem here?

The current regulations do not ensure that all pokies operators have enough direction for practical aspects of harm minimisation in their venues that we know is important. For example, what signs of harm must be recorded which could help identify someone as a harmful gambler or supporting measures like penalties. This means some people will experience harm that could have been prevented or minimised.

A recent court case exposed gaps for prosecutions of pubs and clubs where harmful gambling takes place. This is because – according to the law – pubs and clubs only need to have a harm minimisation policy *in place*. What *needs to be in* this policy is not currently specified by the law. This means that, if a policy is not specific, it makes it difficult for the regulator to prosecute a venue manager for breaching the policy.

Government has not required or helped to facilitate specific actions that venues must undertake. In hindsight, a light regulation model has not been successful and a more prescriptive approach to harm minimisation could reduce the harm New Zealanders experience from gambling on pokies.

The key inadequacies we have identified for the current situation are:

- staff who work at pubs and clubs lack the tools to identify problem gambling and intervene effectively
- the criteria for interventions by venue staff are either not prescribed, or not clearly prescribed in the society policy or venue statement
- harm minimisation regulations assign some responsibilities only to venue managers – meaning societies are not accountable

We know that people who have a problem with gambling on pokies are not usually identified in pubs and clubs. According to the Health and Lifestyles Survey 2018, no player reported that pub and club staff had approached them about their gambling. 16% of these pokie players were experiencing at least some level of gambling harm and may well have benefited from an intervention.¹³

What is the goal?

The key objective of this work is to reduce harm from pokies. The purpose of this discussion document is to find out how we can best use regulations to:

- set more explicit direction for venues and societies on how they can reduce harm,
- make pokie machine's safer through information and features, and
- strengthen compliance with supporting offences and penalties

¹³ <https://www.hpa.org.nz/research-library/research-publications/host-responsibility-for-pokies-in-pubs-and-clubs-results-from-the-2018-health-and-lifestyles-survey>

What can be done?

There are opportunities to strengthen the rules around how pokies can operate. Here are some improvements that could be made:

Problem gambling must be better identified in pubs and clubs and responded to appropriately

More prescriptive tools could be developed to enable venue staff to identify and then know what to do when a patron’s gambling becomes harmful.

Record keeping could be improved

Keeping more consistent and detailed records of how long people gamble for and wider signs of harmful gambling could help staff build a useful picture of when they need to intervene. It could also enable the regulator to monitor a club or pub more effectively to ensure that they are meeting the harm minimisation conditions of their licence.

Training of staff who supervise gambling could be improved

There are opportunities to improve and increase the training that staff who supervise pokies receive.

Changes to how the pokie machines are designed to support harm minimisation

There are opportunities to use technology more to support harm prevention. This includes the advertising of, and information to do with, jackpots.

Penalties to help enforce new harm minimisation regulations

Some new penalties could be developed to support existing and new harm minimisation regulations.

Scope of this project

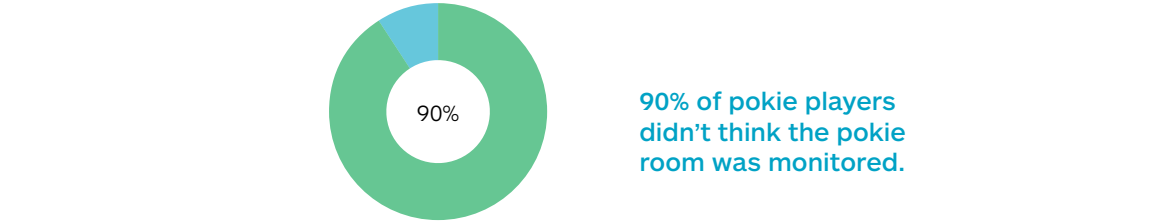
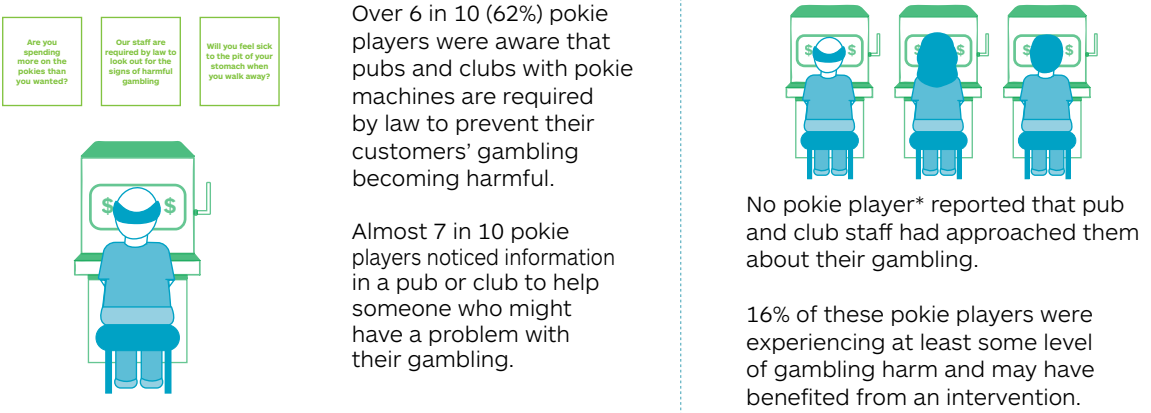
At this stage, the Government is looking to make changes to regulations before broader and more lengthy changes to legislation are considered. This is an initial step to prevent gambling harm to individuals in pubs and clubs throughout Aotearoa.

What is in scope for this discussion...

- changes to regulations to prevent gambling harm from pokies to individuals.
- ... and what is out of scope?
- non-regulatory changes (supporting and additional operational changes are already being progressed)
- changes to the Act or systemic issues such as pokie machine numbers in high deprivation communities
- pokies in casinos are out of scope because they are dealt with differently in the Act

Host responsibility for pokies in pubs and clubs

Results from the 2018 Health and Lifestyles Survey for past-year pokie gamblers in pubs and clubs.



Notes:
The 2018 Health and Lifestyles Survey (HLS) consisted of a sample of 2,725 New Zealand adults. Of these, 1,895 had gambled in the previous 12 months; 333 of them gambled on pokies at a pub or club*. For a full description of the HLS methodology, questionnaire and further HLS publications, please visit hpa.org.nz. More results from the HLS are available at kupe.hpa.org.nz.

A safety net approach

The Government proposes a safety net of ways to limit the amount of time and money people spend on pokies (harm minimisation measures).

Harm minimisation measures are ways to make gambling safer, by attempting to limit the addictive qualities and/or the amount of time and money spent gambling. Some examples of these are:

- self-exclusion
- pre-commitment
- enforced breaks in play

On their own, particular measures are not necessarily enough, but woven together, a combination of measures is more likely to make a difference in reducing the harm people experience from gambling on pokies.

Harm minimisation measures can be thought of as being like a seat belt, airbags or speed limits in a car. Everyone needs them in case something goes wrong – they are there just in case for your safety.

This document sets out some broad options for addressing the shortcomings in current regulations, as well as some specific proposals for changes that could be made of concern is that the current approach is based on host responsibility and an expectation that venues will take steps to identify problem gamblers and intervene. Data shows this does not happen often, which suggests the requirements on venues need a review.

The Government needs your help to choose which harm minimisation measures you believe will be the most effective.

What do we want to know from you?

Our questions focus on three specific areas:

- reducing harm from pokies in venues
- reducing harm in pokie machines
- reducing pokies harm through stronger compliance (offences and penalties)

The questions we would like you to consider, as you read through Parts 1 to 3 are:

- What changes are necessary to identify and stop harmful gambling in pubs and clubs?
- What further tools do staff need to help them identify harmful gambling?
- How could self-exclusion be used more effectively as a tool to prevent harmful gambling?
- How could training of staff be improved?
- Could changes to the features of a pokie machine help reduce harmful gambling? If so, what changes would be most effective?
- What changes could be made to prevent harm from jackpots?
- What infringement offences and penalties could support new and existing regulations?
- What should venue managers / venue operators / societies be accountable for?

A submission form is provided at the end of the discussion document.

PART 1 – Reducing harm in venues: identifying and responding to signs of harmful gambling and better staff training

In pubs and clubs there are strong rules surrounding host responsibility for alcohol, but much fewer for gambling. There are gaps and ambiguities in gambling regulations around host responsibility, including who is responsible for meeting them. Supervision of gambling in pubs and club may fall to staff who may or may not have received explicit – or enough – training in identifying and responding to harmful gambling. This is particularly concerning when venue staff are inexperienced.

It is clear from the data on the rarity of on-site interventions that harm minimisation policies need to be improved. More explicit direction so that hospitality staff know what to do, and when and who needs to intervene. Staff need consistent tools and record keeping so that it is easy for them to do their jobs. Having clarity around this would increase transparency for the regulator and allow for better monitoring of venues and enforcement of any breaches. The Government is interested in hearing what you think should be in a venue's harm minimisation policy.

Improved and consistent training to embed more explicit direction could help to equip venue staff and help normalise best practice. The Government is interested in hearing how you think gambling host responsibility training could be improved for venue staff.

Te Hīringa Hauora's (HPA) Gambling Host Responsibility Guide for Venue Staff¹⁴ provides high-level objectives and training material to assist staff supervising gambling in pubs and clubs to meet their obligations. They are not mandatory. However, people are still gambling for too long and beyond their means without being stopped. This is an opportunity to use regulation-making powers in the Act to make best practice gambling host responsibility mandatory.

Current regulations

Currently, at different levels of the system, societies and venues must follow their policies and plans. These are:

- a **policy for identifying** people experiencing problematic gambling [s308]
- the **society's harm minimisation plan** – a statement about how the society will minimise the risk of problem gambling [s50(2)(c)]
- a **venue harm minimisation plan** – a statement of how the society will minimise the risk of problem gambling and underage gambling at the venue [s65(2)(d)].

The venue manager must take all reasonable steps to ensure that the policy is used to identify actual or potential problem gamblers and guide interventions by staff.

The gaps and ambiguities in regulations

There is nothing in the regulations that stipulate what the harm minimisation plans or policies for identifying harmful gambling should contain. Societies may not have the relevant harm prevention expertise or operational time to understand and create best-practice policies. Without good practice requirements, staff may be uncertain what to do when faced with a patron displaying signs of harmful gambling. Ideally, there would also be greater consistency across the sector.

¹⁴ <https://www.gamblehost.org.nz/resources>

At the moment, staff may have to make their own judgements about:

- how long is too long to be sitting uninterrupted at a pokie machine
- how many ATM or EFTPOS withdrawals patrons can safely make
- how they keep track of patrons’ ATM withdrawals at a venue
- the intensity of the gambler’s pokie use
- what behaviour or events to record in the venue’s records
- when to involve a manager at the venue
- how to intervene, such as the type of questions to ask a person about their gambling

Some examples of unclear policies are:

Under the Act¹⁵ a venue manager “must take all reasonable steps to ensure that the policy [for identifying people experiencing problematic gambling] is used to identify actual or potential problem gamblers”. However, the Act does not say what constitutes “all reasonable steps”.

- Venue policies may contain behavioural indicators for staff to have on their “radar screen” for identifying people experiencing problematic gambling, but be unclear how staff must use these when assessing patrons.
- When assessing multiple ATM/EFTPOS transactions, there may be no definition of what is “one playing session” or “several” transactions.

Harm minimisation training

To identify harmful gambling and to intervene successfully, staff need to be appropriately trained. The Act requires societies to provide this training to enough people for a trained person to always be present while pokies gambling takes place. More often than not, staff have other duties (such as serving patrons at the bar or delivering food) and their time may be split, which can make identification of problematic gambling challenging, for example when the venue gets busy.

The specifics of the training content are currently left for each society to determine. Again, societies may not have the expertise or time to evaluate training needs. The quality of the training can vary. Training may consist of watching a video; there may be little practice of practical skills (e.g. role play), testing for retention of key messages, or refresher training. There is no check on the quality of the training provided to staff. Training may not be sufficient to enable staff – particularly less experienced staff – to confidently identify problematic gambling and intervene.

Currently, societies may devise and deliver training themselves or use a Management Service Provider (MSP) to deliver the training on their behalf. Peak bodies, such as Hospitality NZ, have provided training recently, but their membership only covers around 75% of all pokies venues.

Good practice harm minimisation, such as recognising harmful gambling and record keeping, should largely be the same at all venues. There is a strong case for the content of training to be regulated centrally, instead of being set by each society.

Exclusion and self-exclusion from gambling

There may also be opportunities to use self-exclusion more effectively as a tool to prevent harmful gambling. Exclusion can be requested by the gambler or initiated by the venue. Requests from family or friends of the gambler can lead a venue to investigate whether exclusion is appropriate.

15 Gambling Act 2003, section 308.

Exclusion is a legally binding requirement for the venue not to allow the excluded person to gamble. There are penalties for both the venue and the gambler for breaches of exclusion. An excluded person may visit a Class 4 venue premises so long as they do not enter the gaming area (but if pokies are throughout the venue they will not be able to enter the venue). The Salvation Army administers a multi-venue exclusion process.¹⁶ Self-exclusion seems to be an underused tool and increasing awareness of it as an option may be helpful to some people.

Options

The Government could have more specific requirements for societies and venues, in terms of harm minimisation in pubs and clubs. It could also change the way harmful gambling awareness training is provided.

Key questions

- What changes are necessary to identify and stop harmful gambling in pubs and clubs?
- What further tools do staff need to help them identify harmful gambling?
- How could self-exclusion be used more effectively as a tool to prevent harmful gambling?
- How could training of staff be improved?

Below is a set of changes we think could be worth progressing. It includes requirements for increased monitoring of the gaming room, record-keeping of a specified range of signs of potential harm, and standardised content for training of staff who supervise gambling. Our initial assessment is these changes could potentially have a high impact on gambling harm because they directly address gamblers’ experience of venues and are more specific about the type, quality and regularity of staff interventions. They would also go a considerable way in addressing current gaps and ambiguities in regulations, which hinders enforcement in venues with poor practices.

We’re interested to know if you think this set of options, or any specific option(s), would help prevent harmful gambling.

Options
Venues could be required to monitor the gambling area at set intervals (regular sweeps) to ensure patrons are not displaying signs of gambling harm
Venue staff could be required to talk to a person who has been gambling for a specified period of time (e.g. two hours)
Class 4 venues could be required to record a specified range of harm-related events and signs
Societies could be required to keep records of their use of Management Service Providers (MSPs) to deliver services on behalf of the society
There could be no access to ATMs from inside a venue, only from outside
Excluded gamblers could be required to complete treatment before they can return to a venue
Venue design could be considered in how gambling harm could be prevented or minimised
All gamblers could be required to pre-commit to the amount of money or time they intend to spend prior to gambling
Standardised content for harmful gambling awareness training could be established
All staff who supervise gambling could be required to be trained

16 <https://www.multivenueexclusion.org.nz/>

Some of our initial thoughts on the set of options in Part 1

The options directly target some of the key known issues in identifying and approaching at-risk or problem gamblers.

- Split duties of staff in venues (i.e. monitoring gaming machines and selling and serving food and alcohol) and high turnover of staff working in hospitality industry may have an impact on implementation.
- Some monetary cost to Class 4 sector to implement (i.e. training and ongoing time requirements for observing and recording).
- Some operational updating of systems and practices required by the regulator to determine new internal regulatory criteria, communication to sector and business implementation.
- What happens at one venue may only be part of a person’s overall gambling activity.
- Greater prescription in identifying harmful gambling behaviour and consistent/improved record keeping, should largely look the same across all venues.
- Gambling host responsibility should more closely resemble alcohol host responsibility.
- Still relies heavily on human intervention, so some variation possible in implementation.
- Some of the above options might link with existing tools (e.g. use of facial recognition technology, exclusion registers etc.).

PART 2 – What changes to the game features of pokie machines could be required to make them safer?

Game features

Game features have evolved significantly since the Act was developed, alongside levels of understanding of harm minimisation tools and techniques within games. Therefore, strengthening harm prevention measures in pubs and clubs could be supported with changes to how gaming machines operate. These changes could be part of a safety net to stop harmful gambling.

Currently pokie machines must display the following information and features:

For games

- the odds of winning the game (including the five top and bottom winning combinations)
- the average winnings paid out to players of the game over a particular period of time, or a particular number of plays
- the maximum and minimum player spend rate for the game

Information for players

Pokie machines must include a feature that interrupts play with the following:

- length of playing session
- amount spent
- player’s net wins or losses

The player is asked if they wish to continue playing and must be automatically paid out

Game features refers to all aspects associated with the pokie machine itself: how it looks, sounds and functions. Game features, such as the use of sound and light and ‘free spins’, can significantly influence gambling harm. This occurs through game features influencing which machine types gamblers prefer, how long they stay on the machine and how much they bet on each play. Because of this, regulation of game features has potential to help to prevent and minimise gambling harm.

Key questions

Could changes to the features of a pokie machine help reduce harmful gambling?
If so, what changes would be most effective?

Jackpots

Jackpots can be thought of as a lottery, in the pokie machine context. Each entry is paid for by taking a small amount from each gamble on a machine.

Some jackpots are limited to a single machine (e.g. when someone gambles \$2.50 on a machine, they get a chance to win a jackpot that is only available to users of that machine). Other jackpots are venue-wide: a small amount is taken from each gamble on every machine in a venue and can be won by a single patron on any of those machines.

Jackpots are not dependent on the games being played on the gaming machines – there is no relationship between the reels and symbols that are the basis of most games, and the chance of winning a jackpot.

The maximum amount that can be won from a jackpot is \$1,000. This is twice the amount that can be won from a game played on a gaming machine itself.

Jackpots can be hard to understand and drive up the pace of gambling

Jackpots may cause gambling harm because of the difficulty in understanding the likelihood of winning, or even how much of each gamble is being made available for one or more jackpots. It is also common to have several jackpots running simultaneously, which can be confusing for a gambler user to understand their likelihood of winning or losing one. It also potentially sets an expectation that a user should stay gambling in order to get the money they have already paid into a jackpot back. This is because a jackpot is different in nature to a gaming machine game – jackpots are usually paid out when the prize level is within certain amounts – e.g. \$60 to \$100 or \$800 to \$1,000 to the jackpot.

Linked jackpots

Linked jackpots (those covering all machines in a venue) commonly have the current prize level (e.g. starting at \$800 and progressing up over time to \$1,000) displayed prominently in a gaming area. It is also common for gaming venues to see marked increases in the number of people gambling, the amounts being gambled each play, and to the speed of play. There are reports of gaming machines becoming highly sought after in venues where a jackpot level appears close to being won. There have been instances of stand over tactics and violence to force someone to abandon a machine, and of groups taking charge of all machines in a venue to ensure they share in a jackpot win. This behaviour is harmful in itself, but it also points to harmful gambling, since the perception of control over chances of winning is associated with gambling harm.

Jackpot advertising

There are some rules around how jackpots can be advertised, but concerns have been raised that seeing advertising may encourage people to gamble more than they otherwise would.

Please share your experiences

The Government would like to hear from people who use gaming machines, including those who have experienced harm, if there are concerns about the way jackpots operate, and whether they contribute to any harm observed or experienced. It also wants to hear any views operators, venue staff, and others have about jackpots and whether they create or contribute to harm, or create other problems, such as creating too much competition, leading to disorder or other concerns in the gaming room.

Key question

What changes could be made to prevent harm from jackpots?

Options

The Government could require changes to some features of a pokie machine, and the use of jackpots, to help reduce harmful gambling.

Here are some initial assessments we have made that we think could be worth progressing. These include clearer information for players, reduced bet size, making play sequences less addictive, and reducing jackpot allure.

Because games are the central component in the pokies experience and game features are designed to keep players fixated, these changes could have a real impact on reducing harmful gambling. They will give the player more information and control, reducing spending and discouraging long play periods.

We are interested to know if you think this set of options, or any specific option(s), could help prevent harm from pokies gambling.

Options
Pokie machines could be required to display more information, such as the return to player ratio of games, volatility of games, harm minimisation messaging
Gaming machines should provide information on true losses (as opposed to presenting losses as wins)
Prevent or limit the ability to make multi-row bets
The maximum stake of \$2.50 could be reduced
Prevent or limit the number of “free spins”
Pokie machines could be required to have a maximum number of games that could be played in an hour
Potential measures to minimise the harm from jackpots such as: a. Pokie machines could be required to provide information about how much of any stake is being used for jackpots b. Maximum jackpot size could be reduced c. Signage showing jackpot levels could be prohibited

Some of our initial thoughts on the set of options in Part 2

These options could lead to reductions in time/money spent gambling and/or breaks in play, so gamblers get out of the ‘gambling zone’.

- Some changes could take longer to implement depending on the complexity (e.g. whether both current and new machines have to comply with the new regulations, or just new machines).
- Any software changes would need to consider and be consistent with international gaming machine standards.
- Cost is dependent on specific changes. Changes to machine features will incur software costs – which will vary depending on the option and rollout requirements.
- Pokie machines are becoming increasingly addictive due to technological developments and game features will become ever more sophisticated.
- Changes to game features will have an impact on reducing gambling harm, but the size of the impact is uncertain.
- Some people engage with technical information such as odds / volatility more than others.

PART 3 – Penalties and enforcement

Offences and Penalties

There is opportunity to introduce some new infringement fees. While there are some criminal offences and infringement fees in the Act, none of them relate to the requirements in the current harm minimisation regulations. Increasing existing penalties cannot be done by amending regulations – this must be done by amending the Act – so is out of scope of this document. However, the Act allows for regulations to be made to create new infringement fees.

Infringement notices (unlike a chargeable offence, or licence suspension or cancellation) can issue an instant fee to respond to, and discourage, non-compliant behaviour. Creating infringement offences for the harm minimisation regulations would fill a current gap in the regulator’s tool kit, by providing proportionate responses for small to moderate breaches. They would bridge the gap between very minor and serious breaches as part of a spectrum of responses.

Infringement offences are observable or substantiated offences that incur low-level instant financial penalties (infringement ‘fees’ of less than \$5,000), for example, a parking ticket. They are used to instantly address matters of concern to the community that do not justify the creation of a **chargeable offence** (which imposes a criminal conviction, fine and/or imprisonment).

Current penalties

At the moment, only a small proportion of the chargeable offences and infringement offences in the Act are for breaches of harm minimisation requirements by venues and societies.

Current penalties for breaches of harm minimisation responsibilities – both criminal offences and infringement fees - include:

- Under-age gambling (fine of up to \$500 for gambler, a fine of up to \$5,000 for society and a fine of up to \$1,000 for venue manager or a \$500 infringement fee)
- Failure to display a notice in the gambling area that the venue has a policy for identifying problem gamblers, which is available on request (fine of up to \$5,000 for venue manager or a \$2,500 infringement fee)
- Failure to take all reasonable steps to ensure that the policy for identifying problem gamblers is used to identify actual or potential problem gamblers (fine of up to \$5,000 for venue manager)
- Breach of exclusion order (fine of up to \$500 for gambler, fine of up to \$5,000 for venue manager or a \$500 infringement fee)
- Failure to issue an exclusion order when requested (fine of up to \$5,000 for venue manager)

What can be changed?

The Act allows for regulations to be made to create chargeable and infringement offences for breaches of requirements set in regulations. Infringement fees of up to \$5,000 for a licence holder and \$2,500 for an individual could be created for breaches against the harm minimisation regulations (the current regulations and the proposals in this discussion document)¹⁷.

At present most penalties apply either to the society or to the venue manager. Government could consider creating infringement offences for parties, such as venue operators (ie. the owners of the business or lessees of

17 Gambling Act 2003 section 360

the premises rather than its employee, if the venue manager is not an owner).

The Government needs your views about where chargeable and infringement offences are appropriate and would create the right kinds of incentives for societies and their venues to prevent and minimise harm.

Key questions

- What chargeable and infringement offences and penalties could support new and existing regulations?
- What should venue managers / venue operators / societies be accountable for?

Options

The current regulations lack enforceability. The Government could create new offences and penalties (infringement fees) to accompany both current and new regulatory requirements.

Below are a set of changes that the Government thinks could be worth progressing. They could form part of the safety net preventing New Zealanders from experiencing harmful pokies gambling, by providing the regulator with an instant enforcement tool to ensure rules are adhered to by societies and venues.

One of the key outcomes sought is of messaging: societies and venue staff become more vigilant in understanding, and ensuring compliance with harm minimisation measures, and know that gambling inspectors hold a set of easy to use, instant infringement tools (which align with clear, descriptive requirements). A secondary outcome is that any non-compliance behaviour identified is quickly responded to and not repeated.

At this stage, the options are restricted to changes that can be made under the regulation-making powers in the Act. Larger-scale changes to chargeable offences and the level of infringement fees would require primary legislative changes.

Existing requirement	Create offence for societies/venue operators/venue managers of “failing to meet requirements in regard to restrictions on jackpot advertising and/or branding at Class 4 venues”	New infringement fee of \$1,000 for each offence
	Create offence for societies/venue operators/venue managers of “failing to meet requirements in regard to providing information about problem gambling to patrons and where to get help”	
	Create offence for societies of “failing to meet requirements in regard to required components of problem gambling awareness training to staff who supervise gambling”	
Potential new requirement	Create offence for venue operators/venue managers of “failing to meet requirements in regard to monitoring and recording harm minimisation actions”	
	Create offence for venue operators/venue managers of “failing to meet requirements in regard to harm minimisation machine features”	

Some of our initial thoughts on the set of options in Part 3

These options could help drive culture change in harm minimisation in pokies venues by making the consequences of breaches clear and incentivising compliance.

- Penalties will provide a wider range of tools in the regulator’s toolbox.
- For some venues, the infringement fees may be too low to provide an effective deterrent, but for others, they may be extremely effective.

How to have your say

The closing date for submissions is Thursday 28 April 2022.

Fill in a submission form www.dia.govt.nz/pokiesconsultation
Email your submission to: pokiesconsultation@dia.govt.nz

Send a hardcopy of your submission

Gambling Policy Team
Department of Internal Affairs
PO Box 805
Wellington 6140

Publishing submissions

It is usual practice for all submissions made to the Department of Internal Affairs to be published on its website. Submissions may also be subject to a request made under the Official Information Act 1982.

If there is information in your submission that you do not want released, please make this clear and explain why. For example, some information may be confidential because it is commercially sensitive or personal. You may also ask for your details to be withheld if your submission is requested under the Official Information Act 1982.

The Privacy Act 2020 governs how the Department of Internal Affairs collects, holds, uses and discloses personal information about submitters and the information they have provided. Submitters have the right to access and correct personal information.

What happens next?

Your input is important, as all of the submissions made through this process will be read and considered as the full set of regulatory proposals are being developed. If the Government decides to progress the proposals to amend the regulations, these changes will go through another, more targeted consultation (an ‘exposure draft’) to provide a further opportunity for feedback.

If you are interested in being updated on the progress of this work, you can sign up for email updates at: pokiesconsultation@dia.govt.nz.

If you are interested in how regulations are developed see: <https://dpmc.govt.nz/publications/developing-and-making-regulations>

Appendix A: Glossary

Term	Definition
Class 4	The name given to pokies gambling in pubs, clubs and TAB outlets (not in casinos)
Chargeable offence	Imposes a criminal conviction, significant fine and/or imprisonment
Free spin	Spins on a pokie machine the player doesn’t pay for – a reward or bonus feature
Gambling harm	Harm or distress of any kind, caused or exacerbated by a person’s gambling and includes personal, social or economic harm suffered by any person or society at large
Gambling help service providers	Organisations such as PGF (Problem Gambling Foundation), Hapai Te Hauora, Mapu Maia and Asian Family Services, that offer support and treatment for harmful gambling
GMP	Gaming Machine Profit. The amount paid into pokie machines, less total prizes paid out
Harm minimisation measures or requirements	Ways to make gambling safer by attempting to limit the addictive qualities and/or the amount of time and money spend gambling. Some examples of these are: self-exclusion, pre-commitment, enforced breaks in play
Health and Lifestyles Survey (HLS)	Survey of New Zealanders’ health behaviours and attitudes, covering the areas of alcohol, tobacco control, sun safety, gambling and nutrition. Published every two years by Te Hiringa Hauora
Infringement offence	Observable or substantiated offences that incur low-level instant financial penalties (‘infringement fees’ of less than \$5,000), for example, a parking ticket. They are used to instantly address matters of concern to the community
Jackpot	Like a lottery. A small amount is taken from each spin. Some are on individual machines and some are linked between machines. They are not dependent on the games played but lost/won independently
Loss disguised as win	When a player wins less money than they bet, resulting in an overall loss. For example, a player puts in \$10 and when they “win” \$5 back the pokie machine plays lights and music to suggest a “win”, when it is actually a net loss of \$5
Lotto NZ	Trading name of the Lotteries Commission. Runs lotteries and other land-based games as well as a range of online games
Multi-line betting	The option of more than one pay line on a pokie machine. For example, there could be 20, 30 or even 100 pay lines in a single game. A player may choose to bet on specific pay lines – if the right symbols match up on those pay lines, then they will achieve some sort of win
Online gambling	Gambling on the internet. Defined in the Act as “remote interactive gambling”
Pokies	Electronic Gaming Machines (EGMs), slot machines operating in pubs, clubs, TABs and casinos
Problem gambler	A person whose gambling causes harm or may cause harm (see entry for ‘gambling harm’)
Problem/harmful gambling	Gambling that causes harm to the gambler, those connected to them or to communities, workplace or society at large

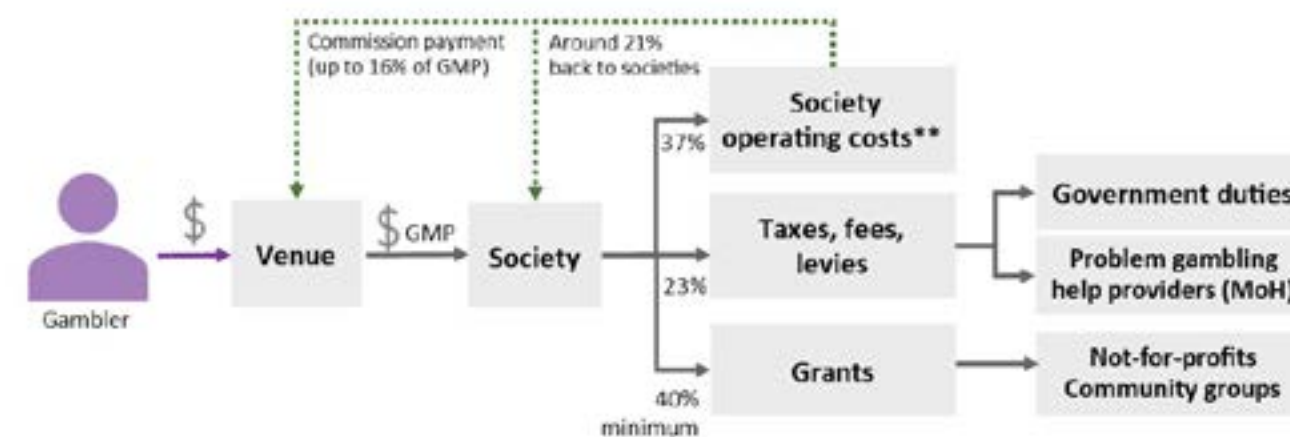
Term	Definition
Regulate	To make rules about something
Regulations	Rules with enforcement paths and consequences for non-compliance. They sit under the Act
Societies / trusts	Also known as corporate societies and pokies trusts, for example NZ Community Trust and Lion Foundation. They own pokie machines, pay venues (pubs and clubs) to host machines and distribute proceeds to community groups. They are required by law to return at least 40 percent of their GMP through community grants
TAB NZ	Racing and sports betting agency, governed by the TAB NZ Board
Te Hiringa Hauora/Health Promotion Agency	Crown agency working to inform health-promoting policy and practice; enable health-promoting initiatives and environments; and promote health and wellbeing. Conducts the HLS (see above)
Venue	A place used to operate Class 4 (pokies) gambling: a pub, club or TAB outlet
Venue operator	The primary business owner of a business in which a Class 4 (pokies) gambling venue is operating: a pub, club or TAB outlet
Venue manager	The individual responsible for the supervision of Class 4 (pokies) gambling and venue personnel within a licenced venue
Venue personnel/staff	A person or persons who works at a Class 4 (pokies) gambling venue and whose work involves dealing with gambling equipment, gamblers or the proceeds of gambling

Appendix B: Class 4 Venue Requirements of the Gambling Act 2003 and the Gambling (Harm Prevention and Minimisation) Regulations 2004

1. The Gambling Act 2003 and the Gambling (Harm Prevention and Minimisation) Regulations 2004 require: The venue has a policy for identifying problem gamblers. The venue manager, or person acting on their behalf, must take all reasonable steps to ensure that the policy is used to identify actual or potential problem gamblers (Section 308). Failure to do so may result in a fine of up to \$5000.
2. There is always a staff member who has received problem gambling awareness training at the venue at all times when gambling is available. A trained staff member must be able to approach a player and provide appropriate information about problem gambling (Reg 12).
3. A notice is displayed in the gambling area advising customers that you have such a policy and that a copy of the policy will be made available on request. (Section 308). Failure to supply a copy of this policy when requested may result in the venue manager being fined up to \$5000.
4. Once a problem gambler has been identified, or there are reasonable grounds to believe that the person is a problem gambler, staff must approach that person and offer information or advice about problem gambling (Section 309). That information or advice must include a description of the self-exclusion procedure (Section 309(2)).
5. After offering the advice and information an exclusion order may be issued by the venue manager (or person acting on their behalf). This prohibits the person from entering the gambling area for a period of up to two years. (Section 309(3)).
6. An exclusion order must be issued promptly if a person has identified themselves as being a problem gambler and has requested that the venue prohibit them from entering the gambling area. (Section 310). A venue manager (or person acting on their behalf) that fails to issue a self-exclusion order when requested commits an offence and is liable for a fine of up to \$5,000.
7. Staff must take all reasonable steps (including issuing an exclusion order) to provide continued assistance on an on-going basis to a person they believe is a problem gambler after the initial approach if the person's ongoing behaviour means there are still reasonable grounds to believe the person is a problem gambler. (Section 309A).
8. Excluded persons must not be permitted to enter the gambling area and must be removed if they do so (Section 311). A venue manager (or person acting on their behalf) who allows an excluded person to enter the gambling area or fails to remove an excluded person may commit an offence and is liable for a fine of up to \$5,000 (Section 312).
9. The venue manager must keep a record of exclusion orders (Section 312A), including:
 - The person's name and date of birth (if provided); and
 - Whether the person self-excluded, or received a venue-initiated exclusion; and
 - The date which the exclusion order was issued and the date of expiry; and
 - Any conditions imposed on the person's re-entry into the venue.
10. No one aged 18 or under is allowed to gamble at the venue (Section 302). Offences may result in a fine of up to \$5000.
11. Providing credit for gambling is prohibited (Section 15).
12. No ATMs are permitted in the gambling area of a venue (Reg 5).
13. Stake and prize limits for class 4 gambling.
14. Class 4 operator must's licence must ensure that: maximum amount single play stake (for stand-alone or linked machine) does not exceed \$2.50; maximum prize single play prize does not exceed \$500, and; maximum single play jackpot prize a linked gaming machine does not exceed \$1,000 (Reg 6).

15. Gaming machine must display certain messages at the election of the player, specifically: game information (odds, average winnings, player spend rates), player information (duration, amount spent, net wins/losses). Machine must display correct time (Reg 7).
16. Gaming machine must include feature that interrupts play every 30 minutes and provide player information (duration, amount spent, net wins/losses). Machine must include a feature that automatically pays out any winnings and credits to the player, if they do not wish to continue (Reg 8).
17. No advertising relating to a gaming machine jackpot can be published either outside the venue, or inside the venue in a way that is visible or audible to persons outside the venue (Reg 9 and 10).
18. The following must be available to players (Reg 11):
 - Pamphlets containing information about the odds of winning on gaming machines and the characteristics of problem gambling, including the recognised signs of harmful gambling and how to seek advice.
 - Signage that is clearly visible that encourage players to gamble only at levels they can afford and contains advice about how to seek assistance for problem gambling.

Appendix C: Pokies System Diagram



This diagram mainly applies to non-club societies, which are the majority of operators. Unlike non-club societies, clubs return money to themselves. They have no minimum return requirement. This model also excludes pokies operated by casinos and TAB/racing clubs.

Appendix D: Submission Form

About you (optional)

From what viewpoint are you making this submission? You can select more than one option. Are you:

- ☐ Someone who gambles on pokies
- ☐ Someone who works in the local government sector
- ☐ Someone who has experienced gambling harm from pokies
- ☐ Someone who works in a pub or club
- ☐ Someone who’s been affected by someone else’s gambling
- ☐ A representative of a society: (please specify)
- ☐ A representative of a gambling help service provider: (please specify)
- ☐ Other group: (please specify)
- ☐ A representative of a community group: (please specify)
- ☐ Other member of the public / individual

Part 1: Reducing harm in venues: identifying and responding to signs of harmful gambling and staff training (pages 15 to 18)

Based on what you’ve read in this part, has the Government correctly understood the problems of reducing pokies harm in pubs and clubs?

Here are some specific measures that the Government proposes could help to reduce harm in pokies venues. We would like to hear your thoughts on the proposals below: do you agree or disagree that they could be effective? Please tell us why you think so in the comment box.

	Specific proposal	Yes	No	Comment
A	Venues could be required to monitor the gambling area at set intervals (regular sweeps) to ensure patrons are not displaying signs of gambling harm			
B	Venue staff could be required to talk to a person who has been gambling for a specified period of time (e.g. two hours)			
C	Class 4 venues could be required to record a specified range of harm-related events and signs			
D	Societies could be required to keep records of their use of Management Service Providers (MSPs) to deliver services on behalf of the society			
E	There could be no access to ATMs from inside a venue, only from outside			
F	Opportunities to increase people's awareness of self-exclusion from venues			
G	Excluded gamblers could be required to complete treatment before they can return to a venue			
H	Venue design could be considered in how gambling harm could be prevented or minimised			

	Specific proposal	Yes	No	Comment
I	All gamblers could be required to pre-commit to the amount of money or time they intend to spend prior to gambling			
J	Standardised content for harmful gambling awareness training could be established			
K	All staff who supervise gambling could be required to be trained			

Are any of the above proposals particularly important to you? Why?

Would you add something to the list above that is not included?

Any other comments on this section?

Part 2: Changes to pokie machines, jackpots (pages 18 to 20)

Based on what you’ve read in this part, do you think the Government has correctly understood how changes to pokie machines could support harm minimisation?
Could changes to machines make a difference to gamblers experiencing harm?

Here are some specific measures that the Government proposes could be effective in reducing harm from pokies. These measures include changes to machines and how jackpots are run. We would like to hear your thoughts on the proposals below: do you agree or disagree that they could be effective? Please tell us why you think so in the comment box.

	Specific proposal	Yes	No	Comment
K	Pokie machines could be required to display more information, such as the return to player ratio of games, volatility of games, harm minimisation messaging			
L	Gaming machines should provide information on true losses (as opposed to presenting losses as wins)			

	Specific proposal	Yes	No	Comment
M	Prevent or limit the ability to make multi-row bets			
N	The maximum stake of \$2.50 could be reduced			
O	Prevent or limit the number of “free spins”			
P	Pokie machines could be required to have a maximum number of games that could be played in an hour			
Q	Potential measures to minimise the harm from jackpots such as: Pokie machines could be required to provide information about how much of any stake is being used for jackpots			
R	Maximum jackpot size could be reduced			
S	Signage showing jackpot levels could be prohibited			

Are any of these proposals particularly important to you? Why?

Would you add something to the list above that is not included?

Any other comments on this section?

Part 3: Penalties and enforcement (pages 21 to 23)

Based on what you’ve read in this part, has the Government correctly understood the situation with penalties and enforcement related to current and future regulations?

Here are some specific proposals that the Government thinks could be effective in reducing harm from pokies through penalties and enforcement. We would like to hear your thoughts on the proposals below: do you agree or disagree that they could be effective? Please tell us why you think so in the comment box.

	Specific proposal	Yes	No	Comment
T	Offence for societies/venue operators/venue managers of “failing to meet requirements in regard to restrictions on jackpot advertising and/or branding at Class 4 venues” (an existing requirement) - with an infringement fee of \$1,000			

	Specific proposal	Yes	No	Comment
U	Offence of “failing to meet requirements in regard to ... providing information about problem gambling to patrons and where to get help” (an existing requirement) - with an infringement fee of \$1,000			
V	Offence for societies of “failing to meet requirements in regard to ... required components of problem gambling awareness training to staff who supervise gambling” (an existing requirement) - with an infringement fee of \$1,000			
W	Offence for venue operators/venue managers of “failing to meet requirements in regard to monitoring and recording harm minimisation actions” (a proposed new requirement) - with an infringement fee of \$1,000			
X	Offence for venue operators/venue managers of “failing to meet requirements in regard to harm minimisation machine features” (a proposed new requirement) - with an infringement fee of \$1,000			

Are any of these proposals particularly important to you? Why?

Would you add something to the list above that is not included?

Any other comments on this section?

Are there any other comments or feedback that you would like to share?

Your personal details

Your personal details will remain confidential

Name:

Contact details:

Date:



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New Zealand Government



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