

12 May 2023
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Re: Gambling Commission Review of Host Responsibility Programme for Christchurch Casino

Thank you for the opportunity to contribute our view on the Christchurch Casinos Limited: 2023 Host Responsibility Programme Review and the updates to the Host Responsibility Programme (HRP) and Problem Gamblers Identification Policy (PGIP). As the leading organisation in Australasia for the prevention and minimisation of gambling-related harm among the Asian community, we have been providing clinical treatment, public health services, and an Asian helpline for the past 20 years. While we recognise the current HRP and PGIP's efforts to consider cultural differences, we believe the existing approach is overly generalised and inadequate in addressing the distinct needs of Asian gamblers.

Asian Family Service urges Gambling Commission to enhance the Christchurch Casino Host Responsibility program by implementing early intervention strategies and clear referral pathways to minimise gambling harm services. The Asian community, facing limited knowledge about gambling harm and cultural barriers to seeking help, experiences 9.5 times more harm than the general population. We strongly advocate for culturally competent approaches, including compulsory referrals to culturally appropriate services, to address these challenges and reduce harm.

Numerous studies and articles have explored the gambling preferences of Asians^{i ii iii}. Some research has discovered that Asian gamblers often exhibit a marked preference for casino gambling, especially games like baccarat. Additionally, they show interest in other forms of gaming that require a degree of skill, such as Mahjong and Pai Gow Poker.

In 2021, Asian Family Services conducted a gambling survey^{iv} with a total sample size of 705 Asians living in New Zealand. The participants were spread across 18 regions in New Zealand and originally came from over 14 Asian countries.

Regarding the problem gambling severity categorisation within the NZ Asian population, problem gamblers constitute 18.4% among the gambling population. When assessing all Asians in New Zealand, problem gamblers account for 13.8%, with 54.4% coming from the Indian community, male, aged under 50 years, and earning \$50-\$70K. Moderate-risk gamblers are more likely to be Filipino, aged 30-49 years, and earning \$70-\$100K. Low-risk gamblers are more likely to be Korean and earn \$50-\$70K.

Asians believe that, on average, there are 4-5 perceived risk factors for developing a gambling addiction. The top three are lack of financial budgeting or planning (58.6%), loneliness (49.9%), and job-related stress (48%). Problem gamblers are more likely to consider using certain medications and



ethnicity as risk factors for developing a gambling addiction. Non-gamblers are more likely to think it is the presence of other addictions, while low-risk gamblers are more likely to think it is specific personality characteristics. Koreans, on average, perceive a higher number of risk factors for developing a gambling addiction than other ethnicities. Additionally, those aged 65+ tend to perceive more risk factors for developing a gambling addiction.

Concerning Asians' perceptions of gambling stigmatisation amongst the general public, Asians perceive that society has much stronger stigmatisation towards excessive gambling (78.7%) than recreational gambling (52.3%). They also perceive that Asian (76.5%) or Maori/Pacific Island (74.1%) gamblers are stigmatised by society to a greater extent compared to European gamblers (65.7%). Among problem gamblers, perceived societal stigmatisation towards excessive gambling is much higher than recreational gambling. However, there is little difference in perceived stigmatisation of the gambler's ethnicity (i.e., all are stigmatised to a high degree).

The top three expressions of public stigma about gamblers with addiction are: having unrealistic expectations about winning at gambling (65.9%), having an addictive personality (61.4%), and being irresponsible with money (57.9%). The weakest expression is that gamblers are likely to be of low socioeconomic status (39.8%).

At Asian Family Services, we advocate for Christchurch's Host Responsibility Programme (HRP) and Problem Gamblers Identification Policy (PGIP) to adopt indicators that align with legislation and assess risk from the early stages. With our 20 years of experience working with Asian clients, we believe early intervention and raising awareness among potentially at-risk Asian clients can help shift the trends, particularly if referrals can be made early on. 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 than for European/Other populations. In simpler terms, they are 950% more likely to develop severe problem gambling issues.

We have witnessed the tragic loss of lives through suicide, attributable to severe problem gambling, impacting both the gamblers and their loved ones. We have encountered relationship breakdowns, family devastation, financial collapse, reduced productivity, and numerous distressing stories. The intergenerational trauma stemming from parents' problem gambling endures, perpetuating an unrelenting cycle. This devastating impact on individuals, families, and communities underscores the need for targeted and effective interventions that address the unique challenges faced by Asian gamblers to break this vicious cycle and alleviate the suffering.

We highly recommend that Christchurch Casinos collaborate with Asian Family Services or other appropriate treatment providers to develop a solid, evidence-based framework focused on early intervention and in line with the harm minimisation principles established in the Gambling Harm Act. These principles aim to guarantee responsible and ethical gambling practices, emphasising protecting vulnerable individuals and communities from the negative consequences associated with gambling.

When problem gambling reaches the severe end of the spectrum, the individual often faces a range of negative consequences, including:



- Significant financial difficulties include debt, bankruptcy, or loss of assets.
- Mental health issues, including depression, anxiety, and substance abuse disorders.
- Relationship problems with family members, friends, and partners, lead to social isolation, marital conflict, and divorce.
- Employment and legal issues include job loss, decreased productivity, and criminal activity to finance gambling.
- Physical health problems resulting from stress, anxiety, and other factors associated with problem gambling.

Addressing these consequences at the severe end of the harm often requires comprehensive, long-term, and multidisciplinary interventions, such as financial counselling, mental health treatment, relationship therapy, and legal assistance. These interventions can be resource-intensive, and the outcomes might be less predictable and less favourable than early intervention strategies.

Early intervention is often more effective and less resource-intensive because it addresses the gambling problem before it becomes deeply ingrained and leads to severe consequences. Additionally, early intervention can prevent the escalation of harm, improve the quality of life for affected individuals, and reduce the overall burden on treatment services.

While there may not be a specific study comparing the amount of intervention needed for Asian problem gamblers at different stages of harm, the general consensus in the literature is that early intervention is crucial in preventing gambling-related harm. To achieve this, we recommend that Christchurch Casinos take the following steps:

Engage in meaningful consultation and collaboration with Asian Family Services or other relevant organisations with expertise in working with Asian communities and addressing problem gambling. By doing so, the casinos can better understand the unique needs and challenges faced by Asian gamblers.

Review existing literature and research on problem gambling among Asian populations to inform the development of culturally appropriate prevention, identification, and intervention strategies. Understanding the nuances of the Asian community's gambling behaviour will help create more effective and targeted approaches.

Incorporate evidence-based early intervention strategies that are specifically tailored to the unique needs and risk factors of Asian gamblers. By addressing these issues proactively, casinos can mitigate the harm caused by problem gambling among this population.

Ensure that casino staff receive specialised training on cultural competency and the specific challenges faced by Asian problem gamblers. This training will enable them to effectively identify and support atrisk individuals, providing timely assistance and resources.

Regularly evaluate the effectiveness of the HRP and PGIP, making data-driven adjustments to ensure continuous improvement and alignment with best practices in gambling harm minimisation. Ongoing assessment and adaptation will help maintain the effectiveness of these programmes and ensure they remain responsive to the evolving needs of the community.



By working together and focusing on culturally sensitive, evidence-based strategies, we believe that Christchurch Casinos can significantly enhance the effectiveness of their HRP and PGIP in addressing the needs of Asian problem gamblers and ultimately contribute to minimising gambling-related harm within the Asian community.

Thank you again for the opportunity to submit this matter. Don't hesitate to contact us if you have any questions regarding this submission.

Ngā mihi nui,

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¹ 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.

ⁱⁱ Raylu, N., & Oei, T. P. (2004). Role of culture in gambling and problem gambling. Clinical Psychology Review, 23(8), 1087-1114.

iii 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.

^{iv} Zhu, A., & Feng, K. (2021). New Zealand Asian Responsible Gambling Report 2021. Asian Family Services.