



NCIWR Submission on the Online Casino Gambling Bill

August 2025

Introduction

We would like to thank the Governance and Administration Committee for the opportunity to provide input on this issue.

The National Collective of Independent Women's Refuges (NCIWR) is a non-governmental organisation that has delivered services to women, children, and whānau affected by family violence in Aotearoa for 50 years. We represent victims of family violence, specifically wāhine and tamariki, who are the primary groups subjected to and impacted by family violence.

As the largest family violence organisation aimed at supporting victims' safety, we have access to comprehensive data relating to thousands of family violence victims. This data provides context and insight into the links between family violence and gambling.

Position Summary

Research has shown that a correlation exists between problem gambling and family violence, particularly intimate partner violence (IPV). It is important to note that problem gambling does not *cause* family violence – rather it reinforces the gendered drivers of violence which in turn intensifies the frequency and severity of harm experienced by victims.¹

Given the established link between family violence and problem gambling, our position is that no additional opportunities for gambling should be introduced.

That said, if the establishment of online gambling is a fait accompli, **we strongly recommend additional protections to minimise the potential for exacerbated harm to family violence victims.**

Key Statistics

Family violence frequently involves some form of economic abuse. Economic abuse is one of the most common means through which perpetrators of intimate partner violence assume control and exercise power over their victims.² For victims, the consequences of economic abuse are devastating.

In December 2024 NCIWR put out a questionnaire to 1,707 women and non-binary victims of IPV. We found that because of their (ex)partner's violence:

¹ Hing, N., O'Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., ... Rawat, V. (2020). *The relationship between gambling and intimate partner violence against women* (Research report, 21/2020). Sydney: ANROWS.

² Milne, S., Maury, S., Gulliver, P., & Eccleton, N. (2018). *Economic abuse in New Zealand: towards an understanding and response*. Good Shepherd: Australia, New Zealand.



- 62.6% of victims ended up with debt they wouldn't have otherwise had,
- victims also told us that debt had the biggest toll on their life, and it was one of the hardest things to get help with.

Collated risk information from 1,250 Refuge clients across the motu also shows how widespread economic abuse is.

- 50.7% were stopped from having their own money by their (ex)partner, and
- 54.2% were excluded from decisions about shared or household money by their (ex)partner.

Perpetrators often commit economic abuse by using household income to fund problem gambling which creates household debt, harming the wellbeing and future prospects of *all* household members. This is frequently done covertly, without the victim's knowledge, and with deliberate efforts to conceal both the gambling and its financial impact.

Given this, any gambling behaviour that occurs within the context of financial coercive control will exacerbate the profound impact and harm that economic abuse already has on victims of family violence.

Harm Minimisation Recommendations

If the establishment of online gambling is already a fait accompli, **harm minimisation needs to be treated as a statutory objective, not a voluntary operator responsibility**. There also needs to be specific rules embedded throughout the legislation and regulations that protects family members of problem gamblers from harm.

Our recommendations are as follows:

1. Create and enforce rules around banning someone who has previously lost joint/family funds and caused harm to family – this cannot be left to self-exclusion

- NCIWR risk data clearly shows that it is common for perpetrators of economic abuse to exclude victims from decisions about shared or household money. This is a form of coercive control and perpetrators cannot be trusted to voluntarily remove it from their arsenal by registering to be excluded.

2. Prohibit gambling on credit – only allow the use of debit cards for payments

- This safeguard would make it harder for a perpetrator to create coerced debt that impacts all members of the household. Recent research from Good Shepherd New Zealand has shown that this very common³ and comments from victims who participated in our recent questionnaire also indicated that coerced debt that their (ex)partner had accrued in their name, without their knowledge, caused them significant ongoing financial instability and risk.

³ Good Shepherd New Zealand. (2025, Mar). *Long-term impacts of family violence economic abuse*. Good Shepherd: Australia, New Zealand.



3. Utilise 'geo-blocking' or similar protection from unlicensed offshore online gambling

- To ensure perpetrators of economic abuse cannot access alternative means to harm victims through coerced debt or other types of financial abuse in an environment unregulated by Aotearoa.

4. Ensure robust enforcement measures for any online sites deviating from regulations

- There should not be a reliance on casinos to self-regulate – harm minimisation needs to be embedded throughout this endeavour and upheld, strongly, by regulators in Aotearoa.

5. Ensure any licensed online gambling sites contribute to community funding from profits

- Ultimately, gambling and the gambling industry is a harmful, destructive, net negative for society. The *only* countervailing benefit to the community from gambling in Aotearoa currently is the money from profits that goes into the community – not that this comes close to mitigating gambling's deleterious harm. The proposed bill would not require this for online casinos. Given that some gambling would shift from physical to online with the new licensing it would mean a reduction in the singular mitigating factor for communities. As it stands, the lack of provision for a contribution to community funds means that there will be nothing offset from the exacerbated harm this bill will cause.

For clarification about any of the points in our submission please contact Research@refuge.org.nz