



RUAPEHU DISTRICT COUNCIL

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31 January 2023

To: Department of Internal Affairs (DIA)
Gambling

Subject: **Performance based Class 4 Licensing submission**

Submission from: Ruapehu District Council
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Council does not wish to speak in support of its submission.

The Ruapehu District ... where adventure begins!



1 PERFORMANCE-BASED CLASS 4 LICENSING – INFORMATION ABOUT PROPOSALS UNDER DEVELOPMENT AND OPPORTUNITY TO FEEDBACK

1.1 Performance-based licensing system

Ruapehu District Council (Council) supports DIA's proposal to take a tailored approach to issuing licences. We understand the need for a performance-based licensing system however, we are concerned about the inherent risks with issuing licences for up to three year periods. Will DIA build in assurance checks to ensure venues are complying in the duration of their licence? If this is the case, how will DIA implement these assurance mechanisms within existing procedures?

1.2 Proposals for refreshed licensing framework

Council recommends ruling out issuing longer licences to new applicants, especially those without a proven track record. New applicants should be required to undergo a trial period, where they demonstrate to DIA that they are able to comply with the Gambling Act 2003.

1.3 Group 1 – Enhancement to parts of the current licensing framework Due diligence regarding key persons in each gambling operation

Council agrees with the proposal to require corporate societies to provide details and assurance in their licence applications about the due diligence they carry out regarding key persons in their gambling operation. In Council's view this will only work if DIA has existing accountability mechanisms to ensure that operators are responsible.

1.4 Greater transparency regarding individuals' interests, and management of conflicts of interest

Council supports DIA's proposal to set out clearer expectations regarding the declaration of interests, and what constitutes a conflict of interest in the class 4 sector. Council advises DIA to consider requiring class 4 societies to have procedures in place for identifying and recording interests and managing conflicts.

1.5 Assurance and evidence of how harm minimization policies are being implemented in practice

Council supports DIA's proposal to require applications for the renewal of an operator's licence to contain details and assurances about the systems that are in place to ensure that these harm minimisation policies are well understood by venue managers and staff, and that they are effectively implemented.

1.6 Targeted assessments of operating costs in comparison to the returns made to authorised purpose

Council supports the move to conduct targeted assessments of licence holders' operating costs.

1.7 Grant processes and due diligence

Council supports DIA's proposal to require corporate societies to distribute net proceeds to the community in which it operates in. Council would however like to see DIA ensure that any funding distributed by clubs be widely available, so the funding opportunities available to community groups are not limited.

