

Submission to the Governance and Administration Committee on the Online Casino Gambling Bill

Introducing Mana Mokopuna – Children's Commissioner

Mana Mokopuna – Children's Commissioner is the independent Crown entity with the statutory responsibility to advocate for the rights, interests, participation and well-being of all mokopuna (children and young people) under 18 years old in Aotearoa New Zealand and, including young persons aged over 18 but under 25 years of age if they are, or have been, in care or custody.

We independently advocate for and with mokopuna within the context of their whānau, hapū, iwi and communities, based on evidence, data and research, including the perspectives of mokopuna.

Our work is grounded in the United Nations Convention on the Rights of the Child (the Children's Convention), Te Tiriti o Waitangi (Te Tiriti) and other international human rights instruments. We are a National Preventative Mechanism under the Optional Protocol to the Convention Against Torture, meaning we monitor places where mokopuna are deprived of their liberty, including in the care and protection, youth justice, youth mental health and intellectual disability spaces.

We have a statutory mandate to promote the Children's Convention and monitor the Government's implementation of its duties under the Convention, and to work in ways that uphold the rights of mokopuna Māori including under Te Tiriti o Waitangi. We place a focus on advocating for and with mokopuna who are experiencing disadvantage, and we recognise and celebrate the diversity of mokopuna in all its forms.

Our moemoeā (vision) is *Kia kuru pounamu te rongo* – All mokopuna live their best lives, which we see as a collective vision and challenge for Aotearoa New Zealand.

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Summary & Recommendations

1. Given the statutory mandate of Mana Mokopuna, this submission is focussed on the potential impact of the Bill on the rights, interests, participation, and well-being of mokopuna in Aotearoa New Zealand. In particular, Mana Mokopuna is concerned that the Bill:
 - fails to recognise the heightened risks and harms associated with online casino gambling by seeking only to regulate rather than comprehensively ban online casino gambling in Aotearoa New Zealand
 - prioritises revenue making from online casino gambling over protecting mokopuna and their whānau and communities from the heightened risks and harms of online casino gambling
 - reverses the ban on online casino gambling advertising despite the evidence that gambling advertising contributes to the normalisation and social acceptance of gambling, particularly among mokopuna, and

- has been developed without mokopuna being involved or consulted, and without their views being taken into account.

Recommendations

2. Because of these concerns, Mana Mokopuna opposes the Bill in its entirety and recommends the following.

- The Bill is abandoned and instead the Government bans online gambling in Aotearoa New Zealand by making it unlawful to provide offshore online gambling to persons located in Aotearoa New Zealand, and taking effective steps to prevent access to offshore online gambling sites in Aotearoa New Zealand, particularly by mokopuna.
- Should the Bill proceed, which it would do in the face of decades of unequivocal peer-reviewed evidence as well as many years of advice provided by officials that gambling is directly linked with a wide range of avoidable serious harms, we strongly recommend that the Governance and Administration Committee (the Committee) recommends amendments to the Bill to better protect mokopuna and their whānau from the high-risk nature of online casino gambling and its associated harms.

Specifically:

- reduce the maximum number of licences that can be granted to online casino gambling operators from 15 to five or less
- increase the minimum age for online gambling from 18 to 20 years old mirroring the age limit for land-based casino gambling
- include allowing an underage person to participate in online casino gambling as an example of a civil liability act
- remove the ability for online casino gambling licence holders or their agents to advertise or market their platforms or products in Aotearoa New Zealand, including online, and
- change the penalty amounts for civil liability acts to a percentage of a licence holder's total revenue (including global revenue if the licence holder is offshore) rather than a fixed dollar amount.
- Before any new regulatory regime is introduced, we call on the Government to:
 - undertake targeted consultation with mokopuna to seek their views on the proposed regulatory regime and make changes to reflect their concerns and insights
 - draft harm prevention and minimisation regulations specifically designed to protect users aged under 25 years and ensure these regulations come into immediate effect on the new regulatory regime being introduced, and
 - draft regulations that prescribe robust procedures that are highly effective at age and identity verification and also protect user privacy and data security, and ensure these regulations come into immediate effect on the new regulatory regime being introduced.

- We also urge the Government to delay the introduction of the new regulatory regime (currently planned for February 2026) to allow enough time to develop and test the robust systems and industry guidance required to support the new regime, including age and identity verification procedures, and undertake additional consultation with affected groups, including mokopuna.

The evidence-based approach: a comprehensive ban on online casino gambling

3. Mana Mokopuna is strongly opposed to the Bill's proposal to regulate, rather than ban, online casino gambling. As we outline below, and as has been clear in the evidence base for a generation, the negative and damaging impacts of gambling on mokopuna, their whānau and wider communities are significant and completely avoidable. As a country we should be aiming to minimise and ban gambling opportunities wherever possible and particularly in relation to certain types of gambling, like casino gambling, that are riskier and more harmful.

High risk nature of online casino gambling

4. Online casino gambling is one of the most harmful types of gambling due to its accessibility, rapid pace, the potential for high-stakes losses, and is associated with a higher likelihood of developing problem gambling behaviour.¹ Online gambling companies can also better target consumers through the use of social media and influencers to engage individuals and online user data to tailor marketing to individuals, sell other gambling products, and prolong user engagement.²
5. Mokopuna are more likely to be exposed to online gambling due to their prevalent use of online and social media platforms and high-level of engagement with mobile technology. They are also more exposed to gambling advertising online, including the promotion of online casino gambling by social media influencers, who may have been picked by online gambling companies because of their appeal and following among younger audiences. Mokopuna may also be normalised to online gambling through their higher engagement in online gaming activities, which often have simulated gambling elements.³ Mokopuna who engage in video gaming, may also be at greater risk to gamble as online gaming is a gateway to online gambling.⁴
6. Mokopuna are also likely to be more vulnerable to the addictive nature of, and adverse effects of, online casino gambling as they are in a stage of brain development where their decision-making, risk perception and impulse control skills are still developing.⁵

¹ Wang, R. et al. (2025) *Relative risk of gambling products within Great Britain: Findings from a rapid literature review and secondary analysis project*. <https://www.gambleaware.org/media/frghrq3f/relative-risk-of-gambling-products-within-great-britain.pdf>

² Wardle, H. et al. (2024). *The Lancet Public Health Commission on gambling*. <https://www.thelancet.com/action/showPdf?pii=S2468-2667%2824%2900167-1>

³ <https://www.gambleaware.nsw.gov.au/supporting-someone/supporting-young-people/gaming-gambling-and-young-people>

⁴ McBride, J. and Derevensky, J. (2016) *Gambling and Video Game Playing Among Youth*. https://www.researchgate.net/publication/312438388_Gambling_and_Video_Game_Playing_Among_Youth

⁵ Rizzo, A. et al. (2023) *Wanna Bet? Investigating the Factors Related to Adolescent and Young Adult Gambling*. <https://pmc.ncbi.nlm.nih.gov/articles/PMC10606462/>

Gambling harm

7. Gambling harm is a well-documented significant social, economic, and health issue in Aotearoa New Zealand. About one in five people will experience harm in their lifetime due to their own or someone else's gambling with Māori, Pacific, Asian and young people most likely to experience inequitable outcomes and gambling harm.⁶ Problem gamblers⁷ may experience poor physical health, higher levels of smoking, hazardous alcohol consumption and other drug use, emotional and psychological distress, higher risk of suicide, reduced performance at work or study, disruptions to their relationships with whānau and friends (including family violence), and higher risk of committing crimes to finance their gambling activities.⁸
8. Mokopuna of problem gamblers are more likely to regularly miss out on basic essentials, suffer emotionally with feelings of neglect, experience family violence, and develop disorders, such as depression, anxiety, and alcohol and drug addictions, at some point in their life.⁹ Mokopuna Māori and Pacific and Asian mokopuna are more likely to experience these negative impacts considering Māori, Pacific and Asian people experience higher levels of problematic gambling and gambling-related harm.¹⁰
9. Children and youth are also vulnerable to becoming problem gamblers as gambling initiated during adolescence is a strong predictor of chronic gambling problems in adulthood.¹¹ According to 2023/24 New Zealand Gambling Survey, 44.3% of youth aged 15–24 years gambled in the past year and young people made up approximately 25% (26,000) of moderate- and high-risk gamblers.¹² In relation to online gambling specifically, globally, it is estimated 10% of the adolescents have gambled online and that 26% of the adolescents who gamble using online casino or slot products could be affected by a gambling disorder.¹³
10. Youth2000 survey data suggests those most at risk of experiencing gambling harm include males, students from low decile and Māori, Pacific, and Asian communities, and students who are gender diverse.¹⁴ A recent systematic review also found that mokopuna with certain risk factors could be at greater risk of developing problem gambling, including: frequent alcohol use, antisocial behaviour, depression, male gender, cannabis use, illicit drug use, impulsivity, number of gambling activities, problem gambling severity, sensation

⁶ Ministry of Health (2025). *Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28*. <https://www.health.govt.nz/system/files/2025-05/strategy-prevent-minimise-gambling-harm-2025-26-2027-28.pdf>

⁷ We note that anyone who gambles can be at risk for developing a gambling problem and so all forms of gambling are potentially problematic.

⁸ Problem Gambling Foundation (2024). *A fair chance for all – breaking the disadvantage cycle*. <https://www.treasury.govt.nz/sites/default/files/2024-05/pc-ing-fcfa-sub-078-pgf-group.pdf>

⁹ Problem Gambling Foundation (2024). *A fair chance for all – breaking the disadvantage cycle*. <https://www.treasury.govt.nz/sites/default/files/2024-05/pc-ing-fcfa-sub-078-pgf-group.pdf>; AUT Gambling and Addictions Research Centre (2020). *New Zealand National Gambling Study: Correspondence Between Changes in Gambling and Gambling Risk Levels and Health, Quality of Life, and Health and Social Inequities*. https://garc.aut.ac.nz/_data/assets/pdf_file/0010/506377/NGS-secondary-analysis-health-correlates-final-report-7-September-2020.pdf

¹⁰ Problem Gambling Foundation (2024). *A fair chance for all – breaking the disadvantage cycle*. <https://www.treasury.govt.nz/sites/default/files/2024-05/pc-ing-fcfa-sub-078-pgf-group.pdf>

¹¹ Moreira, D. N. et al. (2023). *Risk factors for gambling disorder: A systematic review*. <https://doi.org/10.1007/s10899-023-10188-1>

¹² Ministry of Health (2025). *Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28*. <https://www.health.govt.nz/system/files/2025-05/strategy-prevent-minimise-gambling-harm-2025-26-2027-28.pdf>

¹³ Wardle, H. et al. (2024). *The Lancet Public Health Commission on gambling*. <https://www.thelancet.com/action/showPdf?pii=S2468-2667%2824%2900167-1>

¹⁴ New Zealand Council for Educational Research (2024). *Under the radar: A rapid review of recent literature about youth problem gambling*. <https://tuturu.org.nz/assets/NZCER-Youth-gambling-report-FINAL.pdf>

seeking, tobacco use, violence, uncontrolled temperament, and poor academic performance.¹⁵

11. Young problem gamblers are likely to suffer the same physical, mental, social and financial harms as adult problem gamblers. A recent UK study found that problem gambling appeared to be associated with suicide attempts in both young men and women and that young people with problem gambling behaviours should be considered at risk for suicidality.¹⁶
12. Collectively, the evidence is clear and unequivocal – the only justifiable action is to ban online gambling.

If the Bill proceeds: key amendments required from a child rights perspective

Age restrictions

13. Mana Mokopuna recommends the minimum legal age for online casino gambling is increased from 18 to 20 years to match the minimum age for land-based casino gambling and reflect that online casino gambling is more harmful than other forms of gambling.
14. We also recommend that when the Minister is recommending regulations relating to harm prevention and minimisation, as proposed under clause 75 of the Bill, specific limits should be put in place for 20-25 year olds (or 18-25 year olds if our recommendation on minimum age is not adopted), such as spend limits, deposit limits, and time limits. Licence holders should also be prohibited from using casino gambling products that include high-risk design mechanics (e.g. features that are high-speed, encourage repeated and continued engagement).¹⁷
15. Setting specific limits for young people's participation in online casino gambling recognises they are more vulnerable to problem gambling and associated harms, and, up to the age of 25, are still developing capacity to regulate impulses and make more rational decisions. As they start their adult lives, they are also likely to have less disposable income and be managing money for the first time. This would align with the approach taken in other countries, such as the UK (which has recently implemented set stake limits for online slot games, one of the most addictive forms of gambling, for 18-24 years),¹⁸ the Netherlands (deposit and wagering limits for 18-25 years) and Austria (deposit limits for 18-25 years).¹⁹

Robust online age and verification process

16. We welcome the proposal that licence holders will be required to have an age and identity verification process that is acceptable to the Secretary for Internal Affairs. This will be essential to ensuring underage users cannot access online casino platforms. We urge the

¹⁵ Dowling, N.A. et al. (2017). *Early risk and protective factors for problem gambling: A systematic review and meta-analysis of longitudinal studies*. <https://www.sciencedirect.com/science/article/pii/S0272735815301963#s0240>

¹⁶ Wardle, Heather et al. (2021) *Suicidality and gambling among young adults in Great Britain: results from a cross-sectional online survey*. [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(20\)30232-2/fulltext#seccestitle10](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(20)30232-2/fulltext#seccestitle10)

¹⁷ For a list of other high-risk features see <https://www.thelancet.com/action/showPdf?pii=S2468-2667%2824%2900167-1>, p.11.

¹⁸ See <https://www.gov.uk/government/news/new-2-maximum-stake-for-under-25s-playing-online-slots>

¹⁹ Marionneau, V. et al. (2025) *Limit-setting in online gambling: a comparative policy review of European approaches*. <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-024-01150-3>

Government to develop robust standards or criteria to ensure that licence holders implement highly effective and best practice age and identity verification processes that prevent underage users from accessing online casino gambling. In developing these standards or criteria, we recommend the Government takes guidance from key jurisdictions that have recently considered age verification processes to protect mokopuna safety online, such as Australia,²⁰ the UK²¹ and the EU.²² We note that in addition to being highly effective at verifying whether users are of minimum age, these processes should also ensure users' privacy protection, and data security.

17. We note that developing robust age and identity verification processes and industry standards and guidance takes careful consideration, time, trialling and targeted consultation. We therefore encourage the Government to delay the introduction of the new regulatory regime (currently proposed for February 2026) to allow for this.

Reduced number of licenced operators

18. Mana Mokopuna recommends the Bill is amended to reduce the maximum number of licenced operators from 15 to five²³ or less considering the increased risks and harms related to online casino gambling and the subsequent need for the Government to tightly control, monitor and regulate online casino gambling.

Ban on advertising and marketing of online casino platforms

19. Mana Mokopuna opposes the Bill's proposal to allow licenced operators to advertise online casino platforms and recommends the current ban on this type of advertising and marketing continues. We acknowledge that this advertising will be regulated and when recommending regulations, the Minister must have regard to the need to protect mokopuna from being harmed by online casino gambling; however, as international evidence shows, gambling advertising and marketing are important environmental drivers of gambling's social normalisation and acceptance among mokopuna.²⁴ Studies show a substantial proportion of mokopuna recall seeing gambling marketing and that it influences their preferences for gambling, and desire and intentions to participate.²⁵ Mokopuna who are exposed to gambling early in life also have an increased risk of developing gambling problems in adolescence and adulthood, and those who start gambling at a younger age are more likely to develop severe gambling problems.²⁶
20. Mokopuna in Aotearoa New Zealand already experience high exposure to gambling-related advertising and marketing. As shown in a recent study,²⁷ where mokopuna were given wearable cameras to measure the nature and extent of gambling and its marketing

²⁰ See <https://www.esafety.gov.au/about-us/consultation-cooperation/age-verification>

²¹ See <https://www.ofcom.org.uk/online-safety/protecting-children/age-checks-to-protect-children-online>

²² See <https://digital-strategy.ec.europa.eu/en/policies/eu-age-verification>

²³ A maximum of five licences would match number of land-based casinos allowed to operate in New Zealand, as advocated by the Problem Gambling Trust. See <https://ethnichealth.org.nz/wp-content/uploads/2024/10/EMBARGO-Online-Gambling-Position-Paper-2024-Final.pdf>

²⁴ Smith, M., et al. (2019) *High Stakes: Children's Exposure to Gambling and Gambling Marketing Using Wearable Cameras*. https://www.researchgate.net/publication/333522480_High_Stakes_Children's_Exposure_to_Gambling_and_Gambling_Marketing_Using_Wearable_Cameras

²⁵ Ibid.

²⁶ Moreira, D. N. et al. (2023). *Risk factors for gambling disorder: A systematic review*. <https://doi.org/10.1007/s10899-023-10188-1>

²⁷ Smith, M., et al. (2019) *High Stakes: Children's Exposure to Gambling and Gambling Marketing Using Wearable Cameras*. https://www.researchgate.net/publication/333522480_High_Stakes_Children's_Exposure_to_Gambling_and_Gambling_Marketing_Using_Wearable_Cameras

in their everyday lives, almost half of the mokopuna who participated were exposed to gambling marketing 6.9 times per day, on average, mainly at bookstores, convenience stores, supermarkets, and home. Lotteries and scratch cards made up three-quarters of total exposures. Māori and Pacific mokopuna were exposed to in-store marketing and marketing for scratch cards and at supermarkets, at rates between three and almost six times that of their NZ European peers. This level of exposure to lotteries and scratch cards is concerning as research suggests exposure to these types of products promote gambling's legitimacy as an ordinary consumer product, contributes to its social normalisation, and can provide an entry point to other gambling activities and addiction.²⁸

21. Mana Mokopuna is also concerned that allowing licence holders to advertise online casino platforms would also increase mokopuna exposure to gambling advertising and marketing online and targeting by social media influencers. Recent research with mokopuna in Australia shows that, from their perspectives, the use of celebrities and social media influencers is an effective strategy used by the gambling industry to bring attention to gambling advertisements, increase trust in gambling and gambling brands and reduce perceptions of the risks associated with gambling products and engaging in gambling.²⁹ Another study found that young people are particularly vulnerable to social media influencer marketing because they lack the ability to critically reflect on the content that they are seeing and social media influencer marketing may pose additional risks as compared to other forms of marketing because of the connection that influencers have with young people.³⁰

Penalties

22. We welcome the Bill's strong penalty provisions, including that if a licence holder commits a civil liability act (i.e. breaches the Bill or any secondary legislation made under it) they could be liable to pay a penalty up to \$300,000 for an individual and \$5 million for a body corporate or partnership. We also welcome the Bill's proposal that anyone who participates in online gambling on behalf of an underage person is liable to be fined up to \$10,000.
23. For avoidance of doubt, however, we recommend that clause 50 of the Bill is amended to include allowing an underage person to participate in online casino gambling as an example of a civil liability act.
24. Considering the exponential growth of the online gambling industry,³¹ we also recommend the Bill is amended to set penalties as a percentage of a licence holder's total revenue (including global revenue if offshore) rather than a set dollar amount. This would ensure penalties continue to provide an effective deterrence as the industry continues to grow.

²⁸ Ibid.

²⁹ Pitt, H. et al. (2024) *Young people's views about the use of celebrities and social media influencers in gambling marketing*. <https://academic.oup.com/heapro/article/39/1/daae012/7604737>

³⁰ Hudders, L. and Lou, C. (2022) *The rosy world of influencer marketing? Its bright and dark sides, and future research recommendations*.

<https://www.tandfonline.com/doi/full/10.1080/02650487.2022.2137318?scroll=top&needAccess=true>

³¹ See <https://focusonbusiness.eu/en/news/online-gambling-industry-doubled-in-four-years-and-hit-176m-users-and-95b-in-revenue-in-2023/5452>

Regulations to prevent and minimise online casino gambling harm

25. In addition to setting specific limits for young people aged up to 25 years as we recommend above, we are supportive of the range of limits outlined in Clause 75 that the Minister can impose on all online casino gambling users. We strongly encourage the Minister to set a wide range of limits to protect users, including how much a user can bet, how long and how often they can play, limited operation hours for online casino platforms, and limits on the type of games or features they can offer. These limits will be essential to protecting the mokopuna of online casino gamblers and their communities.

Education and support

26. We recommend the Government increases investment in gambling education in schools to raise mokopuna awareness of the risks and harms associated with all forms of gambling, including online casino gambling, provide them with the skills to navigate this space, and access to specialist support if they need it.³² As youth problem gambling is a hidden and not a well-known issue, greater awareness raising among teachers, caregivers and communities and the provision of targeted resources are also needed.³³ As it can also be difficult to detect that mokopuna have a gambling problem, better screening tools may also be needed for teachers to effectively identify vulnerable young people and provide them with the support they need.

Further consultation

27. Mana Mokopuna is concerned about the lack of targeted consultation, particularly with mokopuna, their whānau, communities, and harm minimisation providers, during the development phase of the Bill. As stated by the Department of Internal Affairs, this lack of comprehensive consultation has limited the cost-benefit analysis of the Bill in relation to “distributional impacts and on the views of different groups (across communities, regions, ethnicities, deprivation).”³⁴
28. Online gambling and how to mitigate its negative impacts is a key issue of concern within our communities. As outlined in the Ministry of Health’s *Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28*:

“Online gambling was a matter of significant concern to many of the diverse groups of submitters with participation and risks growing steadily over the past decade or so, as internet access and smart devices have become ubiquitous. Many submissions expressed concerns about the ease of access to online gambling, the targeting of young people, and widespread exposure to gambling advertising and a range of other harms in the digital environment that is blurring traditional boundaries between in-person gambling and other harms.”³⁵

³² See <https://gazette.education.govt.nz/articles/new-resources-to-help-schools-tackle-the-rise-of-youth-gambling/>

³³ New Zealand Council for Educational Research (2024). *Under the radar: A rapid review of recent literature about youth problem gambling*. <https://tuturu.org.nz/assets/NZCER-Youth-gambling-report-FINAL.pdf>

³⁴ Department of Internal Affairs (2024). *Regulatory Impact Statement: Online gambling regulatory design - RIS 2*. [https://www.dia.govt.nz/diawebsite.nsf/Files/Proactive-Releases-2024-25/\\$file/Cabinet-material-on-Online-Casino-Gambling-Phase-2-Decisions-13-Dec-24.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Proactive-Releases-2024-25/$file/Cabinet-material-on-Online-Casino-Gambling-Phase-2-Decisions-13-Dec-24.pdf)

³⁵ Ministry of Health (2025). *Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28*. <https://www.health.govt.nz/system/files/2025-05/strategy-prevent-minimise-gambling-harm-2025-26-2027-28.pdf>

29. As a States Party to the Children's Convention, Government is obligated to include the voices of mokopuna on matters that affect them. That is their right, and it must be upheld. Mokopuna should have been consulted during the development of the Bill, and it is not too late to pause and do that now. They are likely to have significant insights on gambling-related issues, which could inform online gambling regulation and harm minimisation strategies. For example, mokopuna surveyed in Australia on gambling-related issues shared insights on what encourages or deters their participation in gambling,³⁶ how they are targeted by gambling advertising and marketing, and how they would like to see stricter regulations, including a complete ban, on gambling advertising and marketing. They also called for more education about gambling risks and harms in schools, and that young people should be more involved in discussions around gambling marketing as they had important contributions to make based on their own experiences and opinions.³⁷
30. We hope the Committee has the opportunity to hear from a comprehensive selection of affected groups and providers during the submission stage of the Bill and recommends that the Government undertakes targeted consultation with these groups before it finalises the regulatory regime for online casino gambling, particularly as key processes and regulations relating to age and identity verification and harm minimisation are developed.

Conclusion

31. Mana Mokopuna **opposes the Bill in its entirety** as it fails to recognise the heightened risks and harms associated with online casino gambling, particularly for mokopuna, by seeking only to regulate rather than comprehensively ban online casino gambling in Aotearoa New Zealand. Instead, we call on the Committee to recognise the overwhelming evidence base and years of advice from experts and recommend the Government abandons the Bill and makes it unlawful to provide offshore online gambling to persons located in Aotearoa New Zealand.
32. If, against all evidence and advice, the Bill proceeds, we strongly urge the Committee to recommend all of the measures outlined in this submission to strengthen the Bill from a mokopuna rights and wellbeing perspective, as you are obligated to do as signatories to the Children's Convention, and ensure every effort is made to protect mokopuna, and their whānau and communities, from the heightened risks and harms associated with online casino gambling.

³⁶ Hing, N., et al. (2024) 'Getting addicted to it and losing a lot of money... it's just like a hole.' A grounded theory model of how social determinants shape adolescents' choices to not gamble. <https://rdcu.be/eZPqM>

³⁷ Pitt, H. et al. (2024) "It's changing our lives, not for the better. It's important that we have a say". The role of young people in informing public health and policy decisions about gambling marketing. <https://www.researchgate.net/publication/382593522> It's changing our lives not for the better It's important that we have a say The role of young people in informing public health and policy decisions about gambling marketing