

**Appendix A Organisations consulted during this Assessment**

Face-to-face or telephone interviews or email exchanges

Auckland University of Technology  
Canterbury Employers Chamber of Commerce  
Christchurch Casino Charitable Trust  
Christchurch Chinese Community  
Christchurch Guangdong Association  
Christchurch Indian Association  
Christchurch City Council - Strategic Policy  
Christchurch City Council - Alcohol Licensing  
Christchurch City Council - Monitoring and Research  
Christchurch Pasifika Churches  
Department of Internal Affairs, Wellington  
Department of Internal Affairs, Christchurch Casino Inspectorate  
Etu Pasifika - Services for Pacific Families  
Harcourts Real Estate  
Health Promotion Agency - Minimising Gambling Harm  
Health Promotion Agency - Drinking Environments  
He Waka Tapu Trust, Health and Social Services provider  
Inner City Residents Association (ICON)  
Ministry of Health  
Ministry of Pacific Peoples  
Ngai Tuahuriri Runanga and Mahaanui Kura Taiao  
Nga Hau e Wha - National Marae  
NZ Police - Metro Crime Squad  
NZ Police - Alcohol Harm Reduction Unit  
Presbyterian Support Services  
Problem Gambling Foundation, Auckland (Asian Family Services)  
Problem Gambling Foundation, Christchurch  
Salvation Army/OASIS Centre  
Te Runanga of Ngai Tahu  
Victoria Neighbourhood Association

Interviews with Organisations receiving grants from the Casino Charitable Trust

Christchurch City Mission  
Christchurch Apostolic Trust  
Rolleston Community Church  
Lifeline Christchurch  
Youthline Central South Island  
Single Women as Parents  
Barnados Christchurch  
Home and Family Society Christchurch Inc.  
Order of St John (St John Ambulance)  
Age Concern Canterbury Inc.  
Tenants Protection Association Inc.  
Kingdom Resources  
Cholomondley Children's Inc.  
Life Education Trust (Southern)  
Male Survivors of Sexual Abuse Trust  
PILLARS  
Christchurch Women's Refuge/AVIVA  
Project Esther Charitable Trust

Mental Health Advocacy and Support  
West Christchurch Women's Refuge

Interviews with businesses/organisations in the vicinity of the Casino premises

Aroy Thai restaurant  
Belle Interiors  
Black & White café  
Calendar Girls nightclub  
Canterbury Employers Chamber of Commerce  
Chere Cherie salon  
Clark Boyce lawyers  
Delhi Belly restaurant  
Jane Daniels fashion  
Kumpun Thai restaurant  
Martinovich Jewellers  
Palazzo kitchen store  
The Bog restaurant and bar  
Three Cows restaurant and bar  
Symrose's Superette  
Yamagen restaurant

Interviews with businesses which supply goods or services to the Casino

Aitkens Supplies  
Akaroa Salmon  
Alys Apparel  
ASAP Doors  
Bidfood Foodservice  
Bidfood Butchery  
Big Fresh Christchurch  
Caxton Press  
Chapman Tripp Law  
Christchurch Entertainment Bureau  
Commercial Refrigeration Wholesale  
Computer Concepts Ltd  
DB Breweries  
Farms Chicken  
Fletcher Building Interiors  
Flowers on Cashmere  
Forman Interiors  
Garden City Produce  
Greengold Gardens  
Hairy Lemon  
Hotel Montreal  
Ideation  
James Bull Ltd  
Mediterranean Foods Ltd  
Melray Electric  
Playtime Promotions Ltd  
Recruitment Network Ltd  
Sensible Building Solutions Ltd  
Service Foods  
Shauna McClelland Law  
Snow Temp Ltd

Southern Monograms  
Star Media  
The George Hotel  
Total Lighting  
Total Packaging Ltd  
Trents Wholesale Ltd  
United Fisheries  
Warren and Mahoney  
Willis Towers Watson

Interviews with Organisations receiving Corporate Sponsorship funding from the Casino

Golden Oldies 2018  
NZ Metropolitan Trotting Club  
Canterbury Jockey Club  
Crusaders Partnership  
Canterbury Rugby Football Union  
Canterbury Rams  
Canterbury Employers Chamber of Commerce  
Christchurch Symphony Orchestra  
Court Theatre  
Canterbury Greyhound Club  
Canterbury Car Club  
Netball Mainland Zone  
Christchurch Marathon  
Christchurch City Events

**Appendix B Casino Premises Licence**

**CASINO CONTROL AUTHORITY  
CASINO PREMISES LICENCE**

*Section 31, Casino Control Act 1990*

Name of holder of  
casino premises licence: Christchurch Casinos Limited

Address of holder of  
casino premises licence: c/- Bodkins, Solicitors, Limerick Street, (PO Box 268),  
Alexandra, New Zealand

Address and description  
of casino premises:  
• 30-38 Victoria Street, Christchurch, New Zealand, being  
that parcel of land containing 3184.25 square meters or  
thereabouts, being Lot 1 Deposited Plan 3178 (Canterbury  
Land Register) (Certificate of Title 268/116) (subject to  
building line restriction in 348905)

This licence authorises the use of the premises to which it relates as a casino for a period of 25 years commencing with the date on which the operation of the casino commences, and shall then expire, unless -

- The holder of the licence sooner surrenders the licence under section 51 of the
- (a) Casino Control Act 1990; or
  - (b) The licence is sooner cancelled by the Casino Control Authority; or
  - (c) The licence lapses under section 26 of the Casino Control Act 1990; or
  - (d) The licence is renewed under section 34 of the Casino Control Act 1990.

*Conditions*

This licence is subject to -

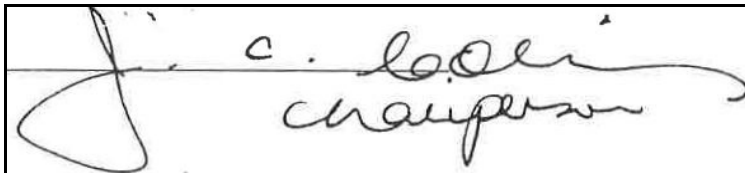
- The conditions contained in the Act; and
- (a)
  - (b) The conditions set out in the Schedule to this licence; and
  - (c) Any conditions imposed by regulations made under the Casino Control Act 1990;  
and

- (d) Any directions given by the Casino Control Authority pursuant to section 70 of the Casino Control Act 1990; and
- (e) A condition that the operation of the casino authorised by this licence shall commence within 2 years after the date on which this licence is granted, namely, the 30th day of June 1995; and that if the operation of the casino does not commence within that period, this licence shall lapse unless the Casino Control Authority extends that period in accordance with section 26 (2) of the Casino Control Act 1990; and
- (f) Any further conditions attached to this licence by the Casino Control Authority pursuant to section 43 of the Casino Control Act 1990 on granting any approval under section 42 of that Act.

Dated this 30th day of June 1993 (date of original issue).

Reissued this 2<sup>nd</sup> day of September 2000 following amendment of address and description of casino premises and variation of licence conditions.

BY the direction of the Casino Control Authority the seal of the Casino Control Authority is hereunto affixed in the presence of :



J. C. Boer  
Chairman



**SCHEDULE - CONDITIONS ATTACHED TO CASINO VENUE LICENCE**

**Preamble**

The following conditions apply to the Casino Venue.

- 1.
2. The Licence Holder must comply with these conditions. Failure to do so could result in the suspension or cancellation of this Licence.

**Interpretation**

3. Words and expressions in these conditions shall have the same meaning as defined in the Gambling Act 2003.  
In these conditions:

4.

**Act** means the Gambling Act 2003.

**Authority** means the Casino Control Authority.

**Casino Venue** means the property situated at 30-38 Victoria Street, Christchurch, as more fully described in the Licence.

**Commission** means the Gambling Commission.

**Controlled by** means possession, directly or indirectly, or power to direct or cause the direction of management of policies, whether through ownership, or voting securities, by contract or otherwise.

**Executive Director** means the Executive Director of the Commission.

**Gambling Area** means that part of the Casino Venue specified in condition 9 where casino gambling is permitted by the Commission.

**Inspectorate** means the Casino Compliance Unit of the Department of Internal Affairs. **Licence Holder** means Christchurch Casinos Limited.

**Rooftop area** includes any structures or developments on the rooftop of the venue. **Secretary** means the Secretary for Internal Affairs.

**Surveillance Standard** means the Surveillance Policy describing the required standard, type, operation and installation of surveillance facilities, approved by the Authority with effect from 5 December 2003, as may be substituted or amended by the Commission from time to time.

**Trust** means the Trust set up under the Deed of Charitable Trust dated 31 October 1994 between Perpetual Trust Limited (under its former name of PGG Trust Limited) and Christchurch Casinos Limited, as may be varied with the approval of the Commission.

**Design and Construction**

5. The Licence Holder shall lodge and maintain with the Commission and the Secretary updated as built architectural floor plans of Levels 3 and 4 of the Casino Venue showing walls, structures and dimensions. Updated as built architectural floor plans shall be lodged with the Commission and the Secretary if the Licence Holder makes alterations to Levels 3 and 4 the Casino Venue requiring building consent from a territorial authority.

6. Subject to the provisions of condition 7, the Licence Holder must obtain the approval of the Commission prior to:

- (a) Any construction or design changes whatsoever in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4) and for any construction or design changes elsewhere in the Casino Venue which may impact on the matters set out in condition 7;
- (b) the construction or relocation outside the Gambling Area and Additional Gambling Areas and within the Casino Venue of bank facilities available to the public excluding ATMs, EFTPOS and like devices; and
- (c) the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue or on or around the building within which it is located.

The process by which the Licence Holder may obtain approval for construction or design changes to Levels 3 and 4 and the rooftop area of the Casino Venue, (paragraph (a) above) is set out in condition 7. The Commission will determine any application for approval under 6(b). The Executive Director may approve the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue or on or around the building within which it is located (paragraph (c) above) if he/she is satisfied the proposed changes will have no potentially adverse effects. If he/she is not so satisfied, the proposed changes must be referred to the Commission for a decision on approval.

7. The Licence Holder must notify the Executive Director of any proposed changes to the construction or design for which approval is required under condition 6. Notification must be accompanied by relevant drawings and an assessment of any impacts the alterations may have on:

- the integrity and fairness of games;
- (a) the effectiveness of security and surveillance;
- (b) harm prevention, harm minimisation and responsible gambling;
- (c) potential access to the Gambling Area by persons under 20 years of age; and
- (d) compliance by any person with the Act, including section 11 of the Act.
- (e)

The Executive Director may approve the proposed changes to the construction or design if he or she is satisfied that there are no adverse impacts in relation to the matters specified in (a)-(e) above. If the Executive Director is not satisfied, he or she will refer the proposal to the Commission for determination.

The Licence Holder shall ensure that:

- 8.
- gambling activity is not visible from outside the Casino Venue; and
  - (a) there is provision for generation of emergency power to maintain in situations of an
  - (b) interruption to mains power:
    - minimum services to the Gambling Area; and
  - (i)

- (ii) lighting in highly sensitive areas such as count rooms, surveillance suite, cashiering locations and gambling equipment storerooms.

**Gambling Area**

9A The Gambling Area within the Casino Venue comprises the areas specified in plans marked "Schedules 1, 2, 3 and 4" annexed to Commission decision GC19/12. The standard Gambling Area for the Casino Venue is delineated in Schedule 1. The Additional Gambling Areas for the Casino Venue are delineated in Schedules 2, 3 and 4 and will form part of the Gambling Area only when activated as provided in condition 9B. When any of Schedules 2, 3 or 4 are so activated, the area(s) may be used to conduct casino promotions only. No other form of gambling activity is permitted in the Additional Gambling Areas.

The Additional Gambling Areas will take when the following conditions are satisfied:

9B

- (a) The Licence Holder must provide the Commission and the Inspectorate with a minimum of 3 days notice in writing of its intention to use an identified Additional Gambling Area.
- (b) The Licence Holder must specify in that notice the dates and times at which the Additional Gambling Area(s) will take effect and terminate. At the notified termination date and time, the Gambling Area will revert to the Gambling Area delineated in Schedule 1.

**General specifications for the count room facility**

10. The Licence Holder shall ensure that the count room is located in a secure area and shall, as a minimum requirement, provide the following:
- effective electronic surveillance in *accordance* with the Surveillance Standard;
  - (a) an alarm device connected to the entrance of the count room which signals to the
  - (b) security/surveillance department whenever the door is opened;
  - a telephone link;
  - (c)

- (d) a count table constructed of transparent material with clear visibility through to the floor;
- (e) an area within, or with access from, the count room to house an enclosed cabinet or trolley(s) with a separately keyed double locking system for the storage of drop boxes; and
- (f) a coin storage area with a double lock system with access from the count room while still inside the secure area.

**General specifications for cage/chip bank facilities**

11. The Licence Holder shall ensure that the cashier's cage is located immediately adjacent to the gaming floor and is clearly visible to patrons. Unless otherwise approved by the Commission, the cage area shall, as a minimum requirement include the following:
- (a) accommodation for chip bank cashiers and general cashiers (which shall be physically separate unless the Commission approves otherwise);  
storage facilities for cage inventory;
  - (b) a separate locked compartment for storage of chips and plaques held in reserve
  - (c) and not used for active gaming;
  - (d) manually triggered and automatic silent alarms connected directly to monitor rooms of the surveillance department; and
  - (e) an interconnect door entry and exit system (man trap) which will not permit a person to pass through the second door until the first door is securely locked.

- 12 The approval of the Commission is required for the construction of any additional cashiering facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

**General specifications for Inspectors/Police facilities**

13. The Licence Holder shall provide facilities within the Casino Venue for the use of Gambling Inspectors and the Police as directed by the Commission. Before issuing any such direction, the Commission shall consult with the Licence Holder and the Department of Internal Affairs and/or the New Zealand Police (as applicable) and invite submissions from each party in relation to any proposal.

**Independent Charitable Trust**

14. The Licence Holder shall support the Christchurch Casinos Charitable Trust established by Deed of Trust dated 31 October 1994 to undertake the objectives and purposes set out in the said Trust Deed.

15. The Licence Holder is required to ask the Trust on an annual basis to provide a list of persons granted funding for the previous year and in what amount, and a list of unsuccessful applicants for funding. The Licence Holder is required to publish annually the amount paid to the Trust, and the information provided to it by the Trust relating to the allocation of funds, as specified in this condition.

**Notification requirements**

16. The Licence Holder shall notify the Commission and the Secretary in writing as soon as possible of any change in the state of affairs of the Licence Holder which has a significant bearing on the holding of the Casino Venue licence, including any person ceasing to be an associated person of the Licence Holder.

17. The Licence Holder, immediately on becoming aware of such an occurrence, shall notify the Commission and Secretary in writing if the Licence Holder or an associated person of the Licence Holder is involved in any:

- (a) conviction for an offence involving dishonesty;  
censure or disciplinary action by a professional body for ethical misconduct;
- (b) censure in any way in relation to a casino in another jurisdiction;
- (c) current investigation (other than routine or periodical inspections) by any
- (d) governmental or statutory body; and

- (e) bankruptcy, receivership or liquidation.

**Audit**

18. The Commission may at any time request access to the Licence Holder's internal audit information or institute an audit of the Licence Holder's Casino business.

19. The Licence Holder shall submit for the approval of the Commission the name of the person or body of persons appointed from time to time by the Licence Holder as Auditor to audit the Casino business. The approval of the Commission shall be revocable in the discretion of the Commission and shall be subject to such conditions as the Commission from time to time imposes.

**Bank accounts**

20. The Licence Holder shall not open any bank account overseas to facilitate, or in connection with, the operation of the Casino without the approval of the Commission.

**Provision of information**

21. The Licence Holder shall, within such period as the Commission may require, provide to the Commission, or to any person authorised by the Commission to receive the same, such reports or other information as may be specified by the Commission relating to:

- (a) the operations of the Licence Holder or any entity controlled by the Licence Holder;
- (b) the operation of the Casino; or
- (c) any associated person of the Licence Holder, being information in the possession of the Licence Holder, as may be specified by the Commission in writing from time to time, within such period as the Commission may require.

22. The Licence Holder shall allow the Commission or staff of the Commission Secretariat, or any other person authorised by the Commission, to enter and remain in any part of the

Casino Venue at any time for the purpose of his or her official duties under the Act.

**Address for service**

23. The Licence Holder shall file with the Commission an address in New Zealand for the service of notices upon it.
24. The Licence Holder may, by notice given to the Commission, change its address for the service of notices.

**Consolidated to 11 September 2015**

Appendix C Casino Operator's Licence

CASINO CONTROL AUTHORITY  
CASINO OPERATOR'S LICENCE

Section 37, Casino Control Act 1990

Name of holder of  
casino operator's licence: Christchurch Casinos Limited

Address of holder of  
casino operator's licence: PO Box 4141, Christchurch, New Zealand  
(registered office: c/- McCulloch & Partners, 34 Camp  
Street, Queenstown).

The holder of this casino operator's licence is hereby authorised pursuant to section 37 of the Casino Control Act 1990 to operate a casino, including the operation of games in the casino, in conjunction with the holder of a casino premises licence, until -

- Τη ηολδερ οφ τηισ λιχενχε συρρενδερσ τηε λιχενχε υνδερ σεχτιον 51 οφ τηε Χασινο Χοντρολ Αχτ 1990; ορ
- This licence is cancelled by the Casino Control Authority under section 91 of the Casino Control Act 1990.

This licence is subject to -

The conditions contained in the Casino Control Act 1990; and

- (a)
- (b) The conditions set out in the Schedule to this licence; and
- (c) Any conditions imposed by regulations made under the Casino Control Act 1990; and
- (d) Any directions given by the Casino Control Authority pursuant to section 70 of the Casino Control Act 1990; and
- (e) Any further conditions attached to this licence by the Casino Control Authority pursuant to section 43 of the Casino Control Act 1990 on granting any approval under section 42 of that Act.

Date

d this 18th day of June 1999.



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**SCHEDULE — CONDITIONS ATTACHED TO CASINO OPERATOR'S LICENCE:  
OPERATION OF CASINO AT 30-38 VICTORIA STREET, CHRISTCHURCH**

**Preamble**

- (a) The following conditions apply to the operation of the Casino Venue by the Licence Holder.
- (b) The Licence Holder must comply with these conditions. Failure to do so could result in the suspension or cancellation of this Licence.

**Interpretation**

- (c) Words and expressions in these conditions shall have the same meaning as defined in the Gambling Act 2003.  
In these conditions:
- (d)

**Act** means the Gambling Act 2003.

**Authority** means the Casino Control Authority.

**Casino Venue** means the property situated at 30-38 Victoria Street, Christchurch, as more fully described in the venue licence reissued to Christchurch Casinos Limited on 22 September 2000.

**Commission** means the Gambling Commission.

**Controlled by** means possession, directly or indirectly, or power to direct or cause the direction of management of policies, whether through ownership, or voting securities, by contract or otherwise.

**Gambling Area** means that part of the Casino Venue specified in condition 9 of the venue licence held by Christchurch Casinos Limited.

**Host Responsibility Programme** means the Christchurch Casinos Limited Programme for Responsible Gaming approved by the Authority in February 2002, as may be substituted or amended in accordance with licence conditions.

**Inspectorate** means the Casino Compliance Unit of the Department of Internal Affairs.

**Licence Holder** means Christchurch Casinos Limited.

**Secretary** means the Secretary for Internal Affairs.

**Surveillance Standard** means the Surveillance Policy describing the required standard, type, operation and installation of surveillance facilities, approved by the Authority with effect from 5 December 2003, as may be substituted or amended by the Commission from time to time.

5. The number of gaming machines in the Gambling Area shall not exceed 500. Each terminal or player station of a multi-terminal or multi-player gaming machine shall be treated as one gaming machine.

The number of gaming tables in the Gambling Area shall not exceed 36.

6.

The ratio of gaming machines to gaming tables in the Gambling Area shall not exceed 15 to

7.

1, except with the approval of the Commission.

At least two table games shall be open for play when the Casino is operating.

8.

The Licence Holder may operate on casino gaming tables the game types and game mixes

9.

specified in Annex A attached to this Licence. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

10. The approval of the Commission is required prior to the use by the operator of any electronic

version of the game types specified in condition 9 above or electronic aids or enhancements or changes to table game rules which create new wagering opportunities.

11. The Licence Holder shall operate in accordance with approved floor layouts showing the position of gaming tables and gaming machines.

12. The Licence Holder shall obtain the approval of the Commission for new floor plans prior to relocating or installing tables or machines in positions not specified in approved floor layouts. When applying the Licence Holder must submit fresh plans showing the floor layout for the Gambling Area and details of the proposed CCTV layout for the consideration of the Commission. Any change must comply with the Surveillance Standard. The Executive Director and a single Gambling Commissioner may approve the new floor plans if they are satisfied that the floor layout has no potentially adverse effects. If they are not so satisfied, the proposed floor plan must be referred to the Commission for a decision on approval.

**EFTPOS and like devices**

13. A maximum of 4 automatic teller machines is permitted in the Casino Venue outside the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4)

14. Except as approved in writing by the Commission, the Licence Holder is prohibited from dispensing cash from EFTPOS and like devices in the Gambling Areas (Schedule 1) at all times and Additional Gambling Areas (Schedules 2, 3 or 4) whenever the Additional Gambling Areas are activated pursuant to condition 9B. The approval of the Commission shall be revocable at the discretion of the Commission and may be subject to such conditions as the Commission may from time to time impose.

15. The Licence Holder is prohibited from using mobile EFTPOS terminals (cash or non-cash dispensing) or like devices in the Gambling Area (Schedule 1) at all times and in the Additional Gambling Areas (Schedules 2, 3 or 4) whenever the additional Gambling Areas are activated pursuant to condition 9B.

16. Except for any approval granted pursuant to condition 14 the Licence Holder is prohibited from dispensing more than \$50 cash per transaction from EFTPOS terminals or like devices within the Casino Venue and must ensure that any cash withdrawals are contemporaneous with a purchase.

17. Subject to the restrictions specified in conditions 14, 15 and 16 above, EFTPOS terminals or like devices may be installed and removed by the Licence Holder within the Casino Venue.

18. The Licence Holder is required to notify the Commission if it moves ATMs in the Casino Venue or if it installs or moves EFTPOS terminals or like devices in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4).

**Security and Surveillance**

19. The Surveillance Standard may be substituted or amended by the Commission at the request of the Secretary, on an application by the Licence Holder, or at its own initiative. The Commission will seek submissions from the Licence Holder, the Secretary and any other affected person before deciding on a proposed substitution or amendment.

20. The Licence Holder shall provide security and surveillance equipment and facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4) and surveillance areas which shall at all times meet and may exceed the Surveillance Standard in whatever form is currently approved by the Commission. The Commission may at any time institute an audit or require the Licence Holder to report on the standard and/or quality of surveillance equipment to ensure it meets or exceeds the Surveillance Standard.

21. The Licence Holder shall obtain the approval of the Commission prior to the introduction into the Casino of new surveillance technology of a type not currently in operation in the casino. Camera upgrades that comply with the requirements of the Surveillance Standard do not require prior approval. When applying for approval, the Licence Holder shall supply sufficient information to enable the Commission properly to assess the application under the Surveillance Standard. Information will include details relating to equipment type and operation, and the proposed location of equipment. The Licence Holder shall allow the Commission or staff of the Commission Secretariat, or any other person authorised by the Commission, to test any technology or equipment.

**General specifications for cage/chip bank facilities**

22. The Licence Holder shall ensure that the cashier's cage is located immediately adjacent to the gaming floor and is clearly visible to patrons. Unless otherwise approved by the Commission, the cage area shall at a minimum include:

- (a) accommodation for chip bank cashiers and general cashiers (which shall be physically separate unless the Commission approves otherwise);  
storage facilities for cage inventory;
- (b) a separate locked compartment for storage of chips and plaques held in reserve
- (c) and not used for active gaming;
- (d) manually triggered and automatic silent alarms connected directly to monitor rooms of the surveillance department; and
- (e) an interconnect door entry and exit system (man trap) which will not permit a person to pass through the second door until the first door is securely locked.

23. The approval of the Commission is required for the construction of any additional cashiering facilities in other parts of the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

**Host Responsibility Programme**

24. The Licence Holder shall ensure that the Casino is operated, whether by itself or pursuant to a casino agreement by another licensee, in compliance with the Host Responsibility Programme, as may be amended in accordance with the procedures set out below.

25. The Licence Holder shall ensure that the Host Responsibility Programme is publicly available on its website.

26. The Programme shall be consistent with and impose no lesser requirement than specified

in the Act or Regulations. The Programme shall address and not be limited to:

(a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;

the provision of signage, brochures and publications, and the effective display

(b)  
and

distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;

(c) the provision of loss and expenditure data to individual loyalty programme members;

identification of problem gamblers and steps to be taken following identification.

(d)

This shall include, as a minimum, the following:

an acceptable definition of problem gambling;

(a)

indicators of problem gambling in the gambling venue;

(b)

the steps to be taken by the Licence Holder in identifying problem

(c)

gamblers;

the steps to be taken by the Licence Holder following identification of

(d)

problem gamblers;

the provision of staff training;

(e)

the provision of exclusion, self-exclusion and limitation programmes;

(f)

assistance to casino employees with managing the potential for personal

(g)

problem

gambling;

recognition of cultural differences amongst gamblers using the Casino, and the

(h)

need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;

(i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;

- 0) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
- (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
- (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol; standards of dress and behaviour at the casino;
- (xiii) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
- (xiv) liaison with problem gambling treatment providers, community service organisations and community representatives;
- (xv) the provision of a safe gambling environment at the casino; and
- (xvi) such other matters as the Commission may require
- (xvii)

27 The Licence Holder may amend the Programme to include appropriate improvements in the delivery of the existing programme and new host responsibility and responsible gambling initiatives.

28 The Licence Holder shall obtain the prior approval of the Commission for any amendment to the Programme that proposes to reduce or remove any host responsibility and responsible gambling initiative in the Programme.

29 The Licence Holder will report to the Commission annually, commencing on 1 July 2009, on the implementation of the Programme and any amendments made to it pursuant to condition 27. The Commission will review the Programme at least every two years, the next revision of the Programme to be submitted to the Commission by 1 July 2009 or such later date as the Commission may approve. It will consult with interested parties, as appropriate, and amend the Programme as it determines, after giving the Licence Holder the opportunity to comment. For the avoidance of

doubt, the Commission may amend the Programme at any time, having consulted with the Licence Holder and interested parties, as appropriate.

30. The Licence Holder will co-operate with the Commission in respect of any inquiry or investigation by the Commission to ensure that the operating procedures and practice of the Casino comply with the Programme.

31. The Licence Holder shall comply with the Advertising Standards Authority Code for Advertising Gaming and Gambling dated 1 June 2001, or any update or replacement thereof, and any relevant regulations in respect of the advertising of gaming activities.

**Intoxicated Persons**

32. The Licence Holder shall not permit an intoxicated person to gamble in the casino.

**Notification requirements**

33. The Licence Holder shall notify the Commission and the Secretary in writing as soon as possible of any change in the state of affairs of the Licence Holder which has a significant bearing on the holding of the Casino Operator's licence, including any person ceasing to be an associated person of the Licence Holder.

34. The Licence Holder, immediately on becoming aware of such an occurrence, shall notify the Commission and Secretary in writing if the Licence Holder or an associated person of the Licence Holder is involved in any:

- conviction for an offence involving dishonesty;
- (a) censure or disciplinary action by a professional body for ethical misconduct;
- (b) censure in any way in relation to a casino in another jurisdiction;
- (c) current investigation (other than routine or periodical inspections) by any
- (d) governmental or statutory body; and

- (e) bankruptcy, receivership or liquidation.

**Audit**

35. The Commission may at any time request access to the Licence Holder's internal audit information or institute an audit of the Licence Holder's Casino business.

36. The Licence Holder shall submit for the approval of the Commission the name of the person or body of persons appointed from time to time by the Licence Holder as Auditor to audit the Casino business. The approval of the Commission shall be revocable at the discretion of the Commission and shall be subject to such conditions as the Commission from time to time imposes.

**Bank accounts**

37. The Licence Holder shall not open any bank account overseas to facilitate, or in connection with, the operation of the Casino without the approval of the Commission.

**Provision of information**

38. The Licence Holder shall, within such period as the Commission may require, provide to the Commission, or to any person authorised by the Commission to receive the same, such reports or other information as may be specified by the Commission relating to:

- (a) the operations of the Licence Holder or any entity controlled by the Licence Holder;  
the operation of the Casino; or
- (b) any associated person of the Licence Holder, being information in the possession
- (c) of the Licence Holder, as may be specified by the Commission in writing from time to time, within such period as the Commission may require.

39. **The Licence Holder shall**, if required by **the Commission**, submit for **the approval of the Commission** samples of gaming guides authorised for distribution to patrons, patron video tapes, films depicting casino play, and a submission stating the odds and house advantage on bets permitted in each authorised game.

**Training**

40. The Licence Holder shall, if required by the Commission, provide, for persons having, or who will have, functions in relation to any of the following capacities in the casino, training courses in the performance of the following functions:

- counting money or chips derived from or used in gambling;
- (a) moving money or chips derived from or used in gambling;
- (b) buying or redeeming chips;
- (c) operating, maintaining, constructing or repairing gambling equipment;
- (d) the provision of security or surveillance services;
- (e) supervising or managing any of the activities described in paragraphs (a) to (e).
- (f)

41. The content, format and duration of such courses shall be from time to time approved by the Commission.

**Entry**

42. The Licence Holder shall allow the Commission or staff of the Commission Secretariat, or any other person authorised by the Commission, to enter and remain in any part of the Casino Venue at any time for the purpose of his or her official duties under the Act.

**Address for service**

43. The Licence Holder shall file with the Commission an address in New Zealand for the service of notices upon it.

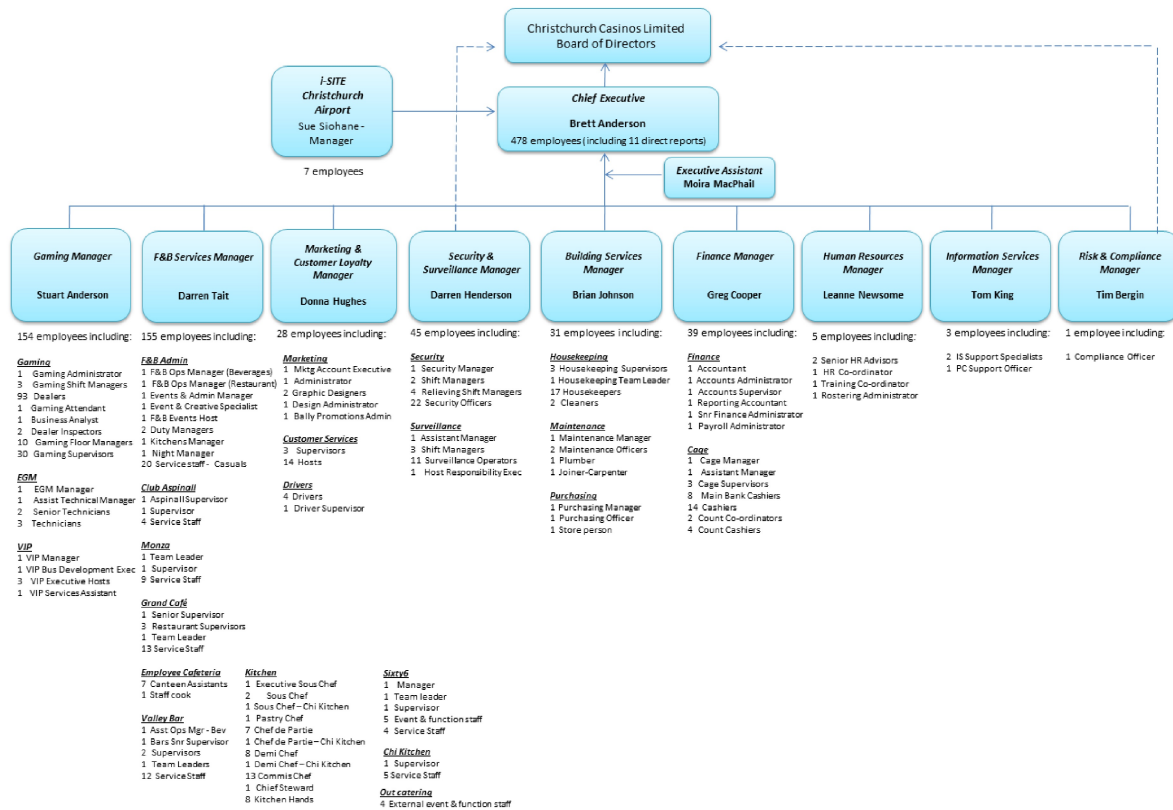
44. The Licence Holder may, by notice given to the Commission, change its address for the service of notices.

**Consolidated to 11 September 2015**

Appendix D Casino Staff Organisational Chart - as at 1 April 2017

Organisational Structure of Christchurch Casinos Limited

As holder of both Venue and Operator's licences under the Gambling Act 2003  
As at 1 April 2017



**Appendix E Current<sup>1</sup> Host Responsibility Programme**



**CHRISTCHURCH**  

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**CASINO**

**HOST RESPONSIBILITY PROGRAMME  
CHRISTCHURCH CASINOS LIMITED**

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<sup>1</sup> i.e. prior to the most recent review by the Gambling Commission, which concluded on 27 October 2017 after this report was written.

**TABLE OF CONTENTS**

- 1.0 Introduction
- 1.1 Statement of position
- 1.2 Programme objectives
- 2.0 Harm minimisation and prevention components
  - 2.1 Policies and procedures
    - 2.1.1 Exclusion
    - 2.1.2 Responsible Service of Alcohol
    - 2.1.3 Unaccompanied children
    - 2.1.4 Underage persons
    - 2.1.5 Standards of dress and behaviour
    - 2.1.6 Long Hours of Presence or Play
    - 2.1.7 Gambling limitation
    - 2.1.8 Cashless Gambling
  - 2.2 Host Responsibility information for customers
  - 2.3 Employee gambling-related harm
  - 2.4 Stakeholder engagement
  - 2.5 Environmental design
  - 2.6 Safe gambling environment
    - 2.6.1 Safe gambling environment - third party loans for financial gain
    - 2.6.2 Safe gambling environment - Cheque retention
  - 2.7 Responsible marketing
  - 2.8 Display of signage and provision of gaming information to customers
  - 2.9 Learning and development
  - 2.10 Identification of problem gamblers
- 3.0 Monitoring and reporting

Appendix A - Current Host Responsibility Resources for Customers

Appendix B - Identification Policy

**1.0 Introduction**

Approval

Effective date: 7 July 2017

Manager:

A handwritten signature in blue ink, appearing to read "Brett Anderson", is centered on the page. The signature is fluid and cursive, with a long horizontal stroke at the end.

Brett Anderson  
Chief Executive

## **1.1 Statement of position**

### **Statement of position**

Christchurch Casino is committed to providing a fun and safe environment for all customers and employees.

Christchurch Casino recognises that alcohol and gambling can be associated with harm for some of its customers. Christchurch Casino takes its role as a responsible host seriously and recognises that it has an important role to play in preventing and minimising alcohol and gambling-related harm for its customers and employees.

Christchurch Casino intends this Programme to be a usable document for all employees which clearly sets out its obligations with respect to harm minimisation and prevention.

### **Compliance with legal obligations**

The Programme has been developed by Christchurch Casino and addresses the host responsibility conditions in the casino operator's licence held by Christchurch Casinos Limited.

Standard Operating Procedures (SOPs) developed by Christchurch Casino shall be consistent with and impose no lesser obligations than provided in the Gambling Act 2003 ("Act"), regulations, licence conditions or this Programme.

## **1.2 Programme objectives**

### **Objectives**

The principal objectives of the Christchurch Casino Host Responsibility Programme include:

- preventing the onset of gambling and/or alcohol related harm and minimising gambling-related harm for customers and other persons potentially affected by their gambling behaviour; and
- facilitating responsible gambling.

Christchurch Casino aims to fulfil these objectives by:

- providing effective employee learning and development;
- providing a safe gambling environment;
- providing responsible marketing and promotional initiatives;
- promoting the responsible consumption of alcohol; and
- engaging effectively with stakeholders.

### **Outcomes**

Christchurch Casino intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol related harm to those customers who may be at risk. Reporting requirements relating to achievement of Programme objectives are set out in section 3.

## **2.0 Harm minimisation and prevention components**

### **Introduction**

Christchurch Casino will focus on addressing underlying causes of gambling and alcohol-related harm as well as taking steps to minimise harm. Harm prevention and minimisation initiatives will be undertaken in the following areas:

- policies and procedures;
- host responsibility information for customers;
- employee gambling-related harm;
- stakeholder engagement;
- environmental design;
- provision of safe gambling environments;
- marketing practices;
- display of signage and provision of gaming information to customers;
- employee learning and development;
- identification of problem gamblers; and
- gambling limitation.

The Programme's requirements for each area are outlined below.

### **Roles and responsibilities**

The host responsibility function at Christchurch Casino is a shared task with all frontline employees able to provide input. (Frontline employees comprise any casino venue employee who is in direct contact with players in the course of his or her duties at the casino venue.)

The role is co-ordinated by the Host Responsibility Executive and is supported by senior managers including:

- Chief Executive Officer;
- Security and Surveillance Manager;
- Risk and Compliance Manager;
- Food and Beverage Manager;
- Gaming Manager; and
- VIP Manager.

The Host Responsibility Executive performs the on-going day to day monitoring and management of Gambler of Interest (GOI) files, provides feedback, advice, support and training to employees, reviews new information on GOI files and maintains the GOI records. The recording, collation and analyses of all information relating to indicators of problem gambling noted by frontline employees, supervisors and managers is also managed by the Host Responsibility Executive.

Reference in Christchurch Casino's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility" denotes the function managed by the Host Responsibility Executive.

## **2.1 Policies and procedures**

### **Policies and procedures**

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of the Christchurch Casino's Host Responsibility Programme. The policies and procedures are consistent with the Act, regulations, licence conditions and this Programme, and will be updated to reflect changes.

#### **Policies:**

- Problem Gambler Identification Policy; and
- Responsible Service of Alcohol Policy.

#### **Standard operating procedures:**

The following SOPs relate to harm prevention and minimisation activities. An overview of how these procedures are put into practice is shown below:

- Exclusion;
- Unaccompanied children;
- Underage Persons;
- Responsible Service of Alcohol;
- Undesirable Behaviour;
- Pre-commitment; and
- Long periods of play.

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation; and
- Analysis and Intervention; and
- Exclusion and Re-entry

### **2.1.1 Exclusion**

#### **Introduction**

Christchurch Casino offers two types of exclusions:

- self-exclusion; and
- Christchurch Casino identified exclusion (casino exclusion).

Christchurch Casino provides the facility for self-exclusion of customers from the casino for an appropriate period of up to two years, dependent on their circumstances, and until they meet re-entry conditions. A customer may request and undertake self-exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler or where the customer chooses to prevent or limit opportunities for harm to occur. The self-exclusion process may also be initiated by problem gambling treatment providers or other venues under a multi-venue exclusion arrangement.

Casino exclusion is for an appropriate period of up to two years and the customer must also meet re-entry conditions.

Casino exclusion is undertaken where a problem gambler does not take up self-exclusion, and Christchurch Casino considers that the customer or his or her family or wider community is or may be experiencing harm as a consequence of that person's gambling behaviour. If Christchurch Casino has reasonable grounds to suspect, as a result of ongoing gambling or other behaviour, that the customer is a problem gambler (as defined by the Act), it must take all reasonable steps to assist the customer, including issuing a casino exclusion in appropriate cases. These decisions are made on the basis of assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of a self-exclusion offer or other host responsibility efforts to assist the customer to gamble without harm but a casino exclusion may be imposed after a serious one-off incident where an offer of self-exclusion has been refused.

Conditions for re-entry are contained in the Exclusion SOP.

### **Approaches to customers**

Only appropriately trained employees undertake exclusions with customers. This is generally only Host Responsibility, Security or Gaming Shift Managers.

### **Features of the exclusion process**

To ensure the effectiveness of the exclusion process, the following are features of the process:

#### **Communication**

- Will use all reasonable efforts to provide a translation service where necessary.
- Provides support to excluded customers through provision of materials from problem gambling counselling service providers and contact details.
- Provides brochures in appropriate languages.

#### **Third parties and service providers**

- Emphasises culturally appropriate processes and, wherever possible and appropriate, encourages families and/or friends to accompany the customer.
- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the excluded customer and during any discussion relating to re-exclusion or re-entry.
- Encourages the excluded customer to nominate a counselling service.
- Arranges for the counselling service to call the excluded customer, if the excluded customer agrees.
- Encourages the excluded customer to make contact with the counselling services as soon as possible after their exclusion.

#### **Other measures**

- Maintains up to date GOI records, including full details of all exclusion orders made, the information required by accessible to Security, Surveillance and Gaming employees to ensure detection of customers breaching an exclusion order. The GOI records must be adequate to ensure that the obligations under section 312A are met.
- Promotes ongoing dialogue with counselling service providers to continually improve the exclusion process.
- Takes action to suspend sending all loyalty information to the customers.

- Requires timely action from employees if a customer approaches requesting self-exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone.
- Provides the opportunity for off-site self-exclusion procedures (e.g. self-exclusion forms are held by problem gambling service providers and can be completed at home).

### **Breaches**

Christchurch Casino employees are required to be vigilant for any excluded customer who attempts to re-enter the casino. Christchurch Casino Security Managers enforce the exclusion process and take action against those detected committing a breach of the exclusion process. Customers discovered attempting to do so may be warned, further excluded for an additional period or issued a Trespass Notice. The Department of Internal Affairs ("DIA") is notified of all breaches by excluded customers and has the ability to take prosecution action if deemed necessary.

The Risk and Compliance Manager in consultation with the Host Responsibility Executive regularly reviews the exclusion process and when necessary, makes improvements, in alignment with company policy. The reviews may involve seeking customer and employee feedback through informal research processes.

### **Loyalty card holders**

Christchurch Casino will disable membership from its Loyalty programme for all excluded, trespassed and/or customers formally requested to leave the premises.

The Security/Surveillance employee responsible for the administration of the exclusion and trespass records must ensure that:

- the Host Responsibility Executive, Gaming Manager and Loyalty Manager are advised within 24 hours of a Loyalty programme cardholder being excluded or trespassed or formally requested to leave the premises; and
- forward any surrendered loyalty card(s) to the Customer Services desk.

The Surveillance Operator or Customer Services must:

- deactivate excluded cardholders' accounts;
- deactivate the accounts of cardholders who have been trespassed or formally requested to leave the premises; and

- deactivate from mailing lists, cardholders who are excluded, trespassed or formally requested to leave the premises.

Loyalty cards which are deactivated are not required to be returned by the customer. Should a customer attempt to use his/her deactivated card, an error message will appear asking the customer to "Please see Club Booth". Having confirmed that the customer has been excluded, trespassed or formally requested to leave, Customer Services will contact Security and appropriate action will be taken in relation to that customer.

### **2.1.2 Responsible service of alcohol**

#### **Background**

Christchurch Casino is committed to being a responsible host. We take pride in delivering an environment that is safe, responsible and fun for our guests and employees to enjoy. A key component is the Christchurch Casino responsible service of alcohol training programme, which is designed for all frontline employees, to promote effective team work to ensure customer safety and enjoyment.

The Christchurch Casino Responsible Service of Alcohol Policy is developed as our response to the requirements of the Sale and Supply of Alcohol Act 2012 and is guided by the key principles of Host Responsibility (Health Promotion Agency, 2014) in licensed premises.

Our objectives, as a responsible host, are:

- to prevent intoxication;
- to serve and manage alcohol responsibly;
- to provide and actively promote substantial food options as well as low and non-alcoholic beverage alternatives ;
- to promote and market in a way that doesn't encourage excessive alcohol consumption;
- to prevent minors from entering our premises;
- to prevent intoxicated persons from entering or remaining on our premises;
- to promote and arrange safe transport options;
- to provide responsible service of alcohol training for all employees; and

- to work with the community, regulators, industry and other external agencies to contribute to a reduction in alcohol related harm.

### **Approach**

The following is the Christchurch Casino's programme regarding the responsible service of alcohol:

- Christchurch Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Christchurch Casino will ensure that it observes the provisions of the Sale and Supply of Alcohol Act 2012 and the Gambling Act relating to the permitted hours within which customers can be sold and supplied alcohol, and customers and staff are permitted on licensed premises.
- Christchurch Casino maintains an effective responsible service of alcohol training programme to train and inform all frontline employees on the responsible sale and supply of alcohol which must be completed prior to serving alcohol.
- All Christchurch Casino frontline employees complete the responsible service of alcohol training programme during their induction as part of the basic level training programme, including recognition of excessive alcohol consumption traits.
- Christchurch Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Christchurch Casino takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
- Any customer who appears under the age of 25 is asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, that customer is not served or supplied with any alcohol.
- Employees tactfully intervene to prevent possible problems arising from excessive alcohol consumption including, where possible, enlisting the services of employees of similar social/ethnic background to the customer to assist in explaining the programme to the customer when required.
- No person who appears intoxicated is served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another, without referral to a more senior employee.
- At all times, when alcohol is being sold or supplied to members of the public, there is a manager or managers on duty who hold a current Manager's Certificate under the Sale and Supply of Alcohol Act 2012.

- When appropriate, Christchurch Casino controls the hours of service and locations from which beverages are served.
- No complimentary alcoholic drinks will be supplied to customers participating in gaming except at the discretion of a Gaming Manager. This is not intended to prohibit normal complimentary Food and Beverage Service for customers, and does not require a customer to participate in gaming activity as a condition of service.
- Any customers invited to functions/events being hosted by Christchurch Casino must abide by the Christchurch Casino Responsible Service of Alcohol Programme and procedures regarding responsible service of alcohol.

### **2.1.3 Unaccompanied children**

#### **Background**

Christchurch Casino management does not allow children to be left unaccompanied or supervised on any part of its premises, or surrounding environs to allow a care giver to gamble.

#### **Approach**

Christchurch Casino takes active steps to prevent:

- children being without adult supervision or
- children left supervised within our immediate vicinity while a main caregiver is gambling.

Employees must report to Security any incident where it is apparent that a child has been left unaccompanied.

Security and/or other senior managers must intervene and take all practicable steps to locate an adult responsible for an unaccompanied child or a child whose caregiver is gambling.

Security and/or other senior managers must contact the Police and trespass or Casino exclude the customer in every case where there is an absence of a reasonable explanation for the child being left unaccompanied.

In all instances of unaccompanied children, the Host Responsibility Executive must be notified as soon as practicable to follow up potential problem gambling issues.

Security Officers will patrol the Casino car parks and surrounding environs, to detect any unaccompanied children.

#### **2.1.4 Underage persons**

##### **Background**

Christchurch Casino is committed to keeping minors out of the casino. Christchurch Casino will rigorously enforce the prevention of underage gambling in its casino.

##### **Approach**

Christchurch Casino must take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gambling facilities (currently 20 and over).

Any customer who appears under the age of 25 is asked for verification of identity and proof of age before being permitted to enter the casino.

Training for Christchurch Casino frontline employees includes the need to be particularly vigilant for the presence of underage persons.

Any Christchurch Casino employee has the authority to approach suspected underage persons and seek identification for proof of age.

#### **2.1.5 Standards of dress and behaviour**

##### **Background**

Christchurch Casino provides a comfortable environment where customers are able to enjoy their surroundings without disruption from others who are inappropriately dressed or behaving in an unacceptable manner.

### **Dress code**

A smart and neat presentation is required at all times and management reserves the right to refuse entry. What is deemed appropriate is a management decision which is reviewed periodically to reflect seasonal changes, fashion and any event being held.

### **Behavioural standards**

If a customer is detected:

- under the influence of alcohol, drugs or other substances;
- abusing or threatening employees or other customers;
- causing conflict with other customers or employees;
- with hygiene issues; or
- otherwise being unpleasant,

then Christchurch Casino employees must:

- take appropriate steps to stop the behaviour; or
- in appropriate circumstances, have the customer escorted from the premises.

Customers exhibiting undesirable behaviour may be trespassed or excluded.

### **2.1.6 Long Hours of Presence or Play**

**Continuous Presence** Continuous Presence is where a customer is present at the casino (but not necessarily gaming continuously) for a period of 12 hours or more. The "clock is reset after a customer has had a break from being present at the casino for six hours or more.

As a general rule:

- when a customer has been observed to be continuously present at the casino (but not necessarily gaming continuously) for 12 hours, the observing staff member will notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- At the very least, in the course of the interaction, the customer should be encouraged to take breaks and Gaming Staff and/or Host Responsibility

must thereafter continue to monitor the customer (which may include subsequent interactions or interventions with that customer)

- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.

- When a customer has been continuously present at the casino (but not necessarily gaming continuously) for 24 hours and, provided that no action has already been taken management will assess whether their play should be permitted to continue or not. Under most circumstances this will relate to VIP customers for whom we have a greater knowledge. Non VIP customers will be asked to leave.

If one or more of the strong indicators is observed, Host Responsibility or Gaming Staff must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been present.

All interactions, observations and assessments must be logged in Christchurch Casino's computerised Incident Reporting and Risk Management System.

**Continuous Play**

Continuous Play is where a customer is gaming continuously for five hours or more. The clock is reset after a customer has had a break from gaming of at least 30 minutes (in aggregate).

As a general rule:

- When a customer has been observed to be continuously gaming for five hours without a break of at least 30 minutes (in aggregate), the observing staff member will notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.

- At the very least, in the course of the interaction, the customer should be encouraged to take breaks and Gaming Staff and/or Host Responsibility must thereafter continue to monitor the customer (which may include subsequent interactions with that customer).

- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.

- When a customer has been gaming continuously with a loyalty card for 10 hours (without an aggregate break of at least 60 minutes) and, provided that no action has already been taken under the Act, this Programme or the Policy, the customer will be assessed for potential harm and may be requested to leave the Casino for at least 24 hours.

If one or more of the strong indicators is observed, Host Responsibility or Gaming Staff must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been on site.

All interactions, observations and assessments must be logged in Christchurch Casino's computerised Incident Reporting and Risk Management System.

**Uncarded** Although ascertaining the length of "continuous presence" and players "continuous play" for uncarded players relies upon observation rather than a system record, if staff become aware of uncarded players being continuously present" or undertaking "continuous play" for the periods set out above, they must report their observation so that those uncarded players are treated as set out above.

CCL also uses technology (Servizio) to help ensure the above policy is maintained by monitoring both carded and uncarded play for continuous presence and/or continuous play.

### **2.1.7 Gambling limitation**

#### **Pre-Commitment**

Christchurch Casino offers customers a voluntary Pre-Commitment system which allows customers to voluntarily set limits on how much they spend and how long they play for on gaming machines.

Customers receive an automated warning message when they reach 80% of their set limit with a further notification when 100% is reached. Should the customer reach their limit they are no longer awarded bonus points or entries into promotions.

Should the pre-commitment limit be reached an automated message is sent to gaming staff who will intervene with the customer if they are still on site.

Breaches of pre-commitment limits and multiple increases or disabling of pre-commitment limits are general indicators of potential problem gambling. Security, Gaming Shift Managers and Host Responsibility will proactively encourage the use of this system, where appropriate, during interactions with patrons.

The features of the voluntary Pre-Commitment system include:

- access to the Pre-Commitment facility via Christchurch Casino's loyalty card;
  - each time the loyalty card is inserted, the Pre-Commitment facility will be activated;
  - the system will allow players to define their own limits for:
    - time limit; and
    - spend limit;
  - enrolment for pre-commitment can occur at either:
    - the gaming machine by the player; or
    - a loyalty member's workstation;
  - an "approaching limits" and "reached limits" notification will be displayed on the gaming machine;
- if limits are relaxed, then the new limits must not be available to the player for a period of 24 hours;
- once the limit is reached, no more loyalty points may be accumulated or entries to promotions earned and the player will be asked to finish up their gambling and leave;
  - The Host Responsibility Executive must be alerted once limits are breached, increased or disabled;
  - no loyalty points can be earned by a player for the 24 hours following a limit being reached; and
  - the system will provide information, support and advice to the operational business units.

### **2.1.8 Cashless Gaming**

Christchurch Casino provides for cashless EGM play. This play may be facilitated by a Secure Electronic Transfer (SET) for loyalty club members (carded play) and Ticket based transactions e.g TITO (Ticket In Ticket Out). Cashless play has the following transaction limits as set out in the gazetted Minimum Cashless Technical Requirements for Printed Ticket-In Ticket-Out and Player Loyalty Account-Based Cashless Gambling Technology.

#### **General Limits:**

A kiosk can, for equivalent cash in any one transaction:

- a. Issue single or multiple tickets up to a combined ticket value of \$500;
- b. transfer equivalent credits to a player loyalty cashless account up to a maximum value of \$5,999;
- c. cash out in cash with no greater than a \$20 denomination a single ticket up to a maximum of \$500; and
- d. cash out in cash with no greater than a \$20 denomination equivalent player loyalty cashless account credits up to a maximum of \$5,999.

A gaming machine, electronic table game or table game redemption device can for equivalent cash in any one transaction:

- a. either by ticket acceptance or a player loyalty cashless account transfer/accept cash equivalent credits for play up to a maximum of \$5,999;
- b. print or issue a single ticket up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay; and
- c. transfer any credits to a player account up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay.

#### **Limits in Restricted Areas:**

A kiosk can, for equivalent cash in any one transaction:

- a. issue a single or multiple tickets up to a maximum combined ticket
- b. value of \$1,000;
- c. transfer equivalent credits to a player loyalty cashless account up to a maximum value of \$5,999;

- d. cash out in cash a single ticket with a value of up to a maximum of \$1,000 in any denomination; and
- e. cash out in cash equivalent to a player loyalty cashless account credits up to a maximum of \$5,999 in any denomination.

A gaming machine, electronic table game or table game redemption device can for equivalent cash in any one transaction:

- a. by ticket acceptance transfer/accept cash equivalent credits for play
- b. up to a maximum of \$5,999;
- c. transfer/accept unlimited cash equivalent credits from a player loyalty cashless account;
- d. print or issue a single ticket up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay; and
- e. transfer unlimited credits to a player loyalty cashless account.

Christchurch Casino has a range of measures to minimize any potential harm from the use of cashless gambling

- enhanced automated monitoring (Servizio) to include greater scrutiny of EGM play;
- CCL continues to develop an early identification of problem gambling algorithm with the aim of creating a predictive model using loyalty data;
- Enhanced staff awareness of the risks associated with cashless gambling
- CCL provide the following details to the Gambling Commission as part of its annual HRP reporting:
  - the number of patrons using SET for EGM play
  - the number of patrons identified as potential problem gamblers as a result of changes to their patterns of play after using SET
  - the number of patrons identified as potential problem gamblers through the application of the predictive algorithm (when implemented).

## **2.2 Host responsibility information for customers**

### **Customer information resources**

Christchurch Casino produces a range of host responsibility information resources for customers. Copies of all Christchurch Casino brochures and other host responsibility information are available and displayed where appropriate in Christchurch Casino's gambling area.

This information is also supplemented and supported by the Christchurch Casino website ([www.christchurchcasino.co.nz](http://www.christchurchcasino.co.nz)) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is displayed on the Christchurch Casino website.

There is an ongoing process of review and development of resources for customers.

Information resources are translated into a variety of languages consistent with the cultural make-up of Christchurch Casino's customer base.

A summary of Christchurch Casino's host responsibility resources for customers is shown in Appendix A (of this appendix).

## **2.3 Employee gambling-related harm**

### **Introduction**

Christchurch Casino is committed to an internal culture that proactively supports and promotes host responsibility.

### **Background**

Christchurch Casino undertakes a range of measures concerning the potential for employee gambling-related harm that aim to:

- prevent and minimise gambling-related harm amongst Christchurch Casino employees as a result of their own, or someone else's, gambling;
- enhance the ability of Christchurch Casino employees to undertake effective host responsibility; and
- contribute to the prevention and minimisation of gambling-related harm in the community.

### **Requirements**

Christchurch Casino recognises that employee gambling-related harm is a sensitive issue. Accordingly, measures to promote awareness and encourage and support help-seeking will be discreet and interventions with Christchurch Casino employees kept confidential.

Christchurch Casino will undertake the following to provide assistance to casino employees with managing the potential for personal problem gambling:

### **Information resources**

- Develop supporting resources for employees that will be made available when required. They will include:
  - information in the Christchurch Casino handbook for seeking help;
  - a standardised gambling screen; and
  - self-help resources to assist with early self-identification and intervention.
- Incorporate information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in host responsibility training programmes and in the EAP Services (employee assistance) programme.

- Promote awareness and information about self-assessment and self-help resources, and encourage employees to use these resources themselves to assist with early identification and intervention.

### **Policies and procedures**

- Prohibit employees from gambling at Christchurch Casino or Dunedin Casino.
- Prohibit access to online gambling sites by employees while at Christchurch Casino (unless work related).
- Identify high risk areas for employees and target with increased levels of information.

### **Recruitment**

- Assess all job applicants for evidence of problem gambling.
- Assess applications from those who we believe may be problem gamblers, or who disclose relevant indicators (as set out in the Christchurch Casino Identification Policy) during the recruitment process and then provide appropriate information, advice and assistance.
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Christchurch Casino Host Responsibility Programme.

### **Support for employees**

- Provide assistance to employees who are experiencing gambling-related harm including:
  - identification;
  - intervention;
  - referral to confidential support through the EAP Services Programme and/or a problem gambling treatment provider;
  - confidentiality; and
  - wherever possible Christchurch Casino will involve problem gambling counsellors in employee induction training about the signs of problem gambling among employees and customers.

### **Engagement"**

- Work with Class 4 organisations to maximise the effectiveness of their Host Responsibility Programme.

## **2.4 Stakeholder engagement**

### **Background**

Christchurch Casino aims to maintain constructive relationships with members of the local community.

### **Approach**

Christchurch Casino will continue to facilitate opportunities for regular engagement to ensure local stakeholders:

- understand and are aware of Christchurch Casino's Host Responsibility Programme;
- are able to continue to raise and discuss operational issues in relation to host responsibility;
- continue to have opportunities to provide input into Christchurch Casino's Host Responsibility Programme and harm prevention and minimisation initiatives; and
- have opportunities to participate in partnership projects on key initiatives where appropriate.

Christchurch Casino currently convenes a regular problem gambling liaison meeting to discuss host responsibility issues. These issues relate primarily to operational activities, for example, referrals and exclusions, etc. These are also opportunities to discuss broader sector initiatives.

Christchurch Casino will invite representatives from:

- local Ministry of Health approved treatment providers, (including Salvation Army Oasis Centre, and the Problem Gambling Foundation);
- Christchurch City Council; and
- government agencies (including DIA and the Police).

In developing and implementing its Programme, and harm prevention and minimisation initiatives, Christchurch Casino will consider the views expressed by the attendees of the liaison meeting. Christchurch Casino also conducts other engagement activities, for example, hosting site visits from problem gambling service providers, engaging with community boards and is an active member on the local Alcohol Accord Management Committee.

Christchurch Casino will work with surrounding class 4 (pubs and clubs) venues to maximise the effectiveness of their Host Responsibility Programmes.

## **2.5 Environmental design**

### **Approach**

Christchurch Casino's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol.

### **Considerations**

In considering the impact of any proposed changes, the key objectives are to ensure that environmental features:

- contribute to harm prevention, or have a neutral impact on harm;
- encourage responsible gambling and alcohol consumption choices;
- do not contribute to the onset of harm or exacerbate risk; and
- facilitate effective host responsibility, particularly early identification and intervention.

This approach applies to the following Christchurch Casino areas:

- floor lay-out, furnishing and design;
- casino electronic gaming machine and table game location;
- access to cash;
- game and equipment features;
- environments adjacent to the gambling area, including access to other entertainment options;
- physical location and presence of Security and Host Responsibility;
- location of problem gambling and other information resources; and
- access criteria, including dress codes and age restrictions.

### **Requirements**

Christchurch Casino shall in its environmental design seek to ensure:

- problem/responsible gambling signage and exit points are clearly visible;
- patrons are visible to venue employees in the gambling area;
- machine alleys with no exit point and in dimly lit corners are avoided;
- gambling area is well lit, utilising natural light where appropriate;
- clocks are visible in the gambling area; and
- other non-gambling entertainment options are available.

### **Other regulatory processes**

All applications for construction or design changes to gambling area must be approved by the Gambling Commission. As part of any such application, Christchurch Casino assesses any impacts the alterations may have on harm prevention and harm minimisation. The impact of any proposed design change on gambling harm is assessed in determining the suitability of any such proposal prior to making applications to the Commission.

## **2.6 Safe gambling environment**

### **Approach**

Christchurch Casino's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and or responsible consumption of alcohol.

### **Considerations**

In determining what a "safe environment" means Christchurch Casino has drawn from the relevant definitions within the Gambling Act. These include:

- facilitating responsible gambling that is;

(a) lawful, fair, and honest; and

(b) conducted-

(i) in a safe and secure environment; and

(ii) without pressure or devices designed to encourage gambling at levels that may cause harm; and

(iii) by informed participants who understand the nature of the activity and do not participate in ways that may cause harm;

- to limit opportunities for crime or dishonesty associated with gambling;

- to prohibit gambling on credit other than as approved by the former Casino Control Authority ("CCA") or Gambling Commission; and

- to take all practicable steps to prevent loan transactions by third parties for financial gain i.e. to protect customers from illegal or oppressive loan activity, or "loan sharking" as it is known.

Should these events occur a Person of Interest (POI) file will be created and an investigation completed.

## **Requirements**

Christchurch Casino will:

- Take all reasonable and practicable steps to ensure a safe environment is maintained including that customers play no more than one gaming machine at a time.
- Report as appropriate any suspicious or unusual transactions to regulatory agencies.

### **2.6.1 Safe gambling environment - third party loans for financial gain**

## **Legislation**

Under section 15(1) of the Act, Christchurch Casino is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided at Christchurch Casino.

## **Policy**

Christchurch Casino does not permit loan transactions by third parties for financial gain at the casino, except as approved by the CCA or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or "loan sharking" as it is known.

## **Requirements**

- Christchurch Casino will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- Christchurch Casino will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process Christchurch Casino will maintain an Undesirable Behaviour SOP which shall explain how Christchurch Casino will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino employees observe suspicious behaviour or information is presented from external parties regarding loan activity, Christchurch Casino will investigate and act in a timely manner. This process is outlined in the Christchurch Casino Undesirable Behaviour SOP.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, Christchurch Casino will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, Christchurch Casino may request the customer to leave the premises, pending further investigation. At the completion of

its investigation, and where a person is found to be offering loans for financial gain, Christchurch Casino will issue that person with a trespass notice.

- Christchurch Casino will notify DIA Gambling Inspectors of suspected loan sharking activity in accordance with Minimum Operating Standards for Records and Notification. Where appropriate Christchurch Casino will also notify relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e., not the casino), Christchurch Casino will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.
- Depending on the outcome of the GOI investigation, the customer may be issued with a Christchurch Casino exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- Christchurch Casino will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

## **2.6.2 Safe gambling environment - cheque retention**

### **Policy**

Christchurch Casino will, when accepting international cheques which it will hold unbanked by arrangement with a customer, report this to Host Responsibility.

### **Requirements**

Host Responsibility will monitor and record the activities of any customer whose cheque it is holding unbanked by arrangement for indicators of potential gambling harm.

## **2.7 Responsible marketing**

### **Legislation and industry codes**

Christchurch Casino's marketing activities comply with applicable laws, Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004, relevant industry codes including the New Zealand Advertising Standards Authority "Code for Advertising Gaming and Gambling") and licence conditions.

## **Requirements**

Christchurch Casino will not pursue marketing initiatives which have any of the characteristics set out below. Where concerns are raised by third parties, Christchurch Casino will investigate and, where appropriate, take immediate action to withdraw or amend the marketing initiative.

Christchurch Casino will ensure an internal process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of Christchurch Casino's loyalty programme and/or on-line social media platforms.

This process includes consultation with Host Responsibility during the development of initiatives. Consultation includes consideration of the following principles.

Does the marketing initiative:

- Target groups at increased risk of experiencing gambling harm?
- Target minors, portray minors participating in gambling activities, or advertise gambling on radio/television at times when minors are more likely to be exposed?
- Encourage or reinforce gambling behaviour(s) that may be associated with harm, including:
  - encourage customers to participate beyond their limits of time or money?
  - discourage customers from taking breaks?
  - promote gambling as a means of relieving financial or personal difficulties?
  - state or imply that gambling is a means of winning or paying for household staples, education or housing commitments?
  - promote excessive alcohol consumption or associate gambling with excessive alcohol consumption?
- Present gambling in an unrealistic, misleading, or deceptive way, including:
  - exaggerating the chances of winning or the size of the prize, including a promise of winning?
  - stating or implying that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game?
  - exploiting superstitions or concepts of luck?

## **2.8 Display of signage and provision of gaming information to customers**

### **Background**

A key component of the Programme is the provision of information for customers. Provision of information is intended to assist customers to make informed decisions about their gambling and alcohol consumption while at Christchurch Casino.

A description of how Christchurch Casino will discharge its obligations to offer information and advice to persons identified as problem gamblers is addressed in the Problem Gambler Identification Policy and the SOPs.

### **Approach**

Christchurch Casino has a range of information resources that are provided to customers, summarised in Appendix A (to this Appendix).

### **Display of signs, brochures, clocks and website**

Christchurch Casino ensures that:

- host responsibility material is displayed prominently and translated into a variety of languages besides English, consistent with the cultural make-up of its customer base;
- brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations;
- all gaming machines and gaming tables at Christchurch Casino display problem Gambling Helpline telephone numbers. The information is also displayed on or near all ATMs, bathrooms and the smokers' room; and
- clocks are on display in the Christchurch Casino Gambling Area.

Christchurch Casino will make available its 'Taking the Mystery out of the Machine' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are, or that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

Christchurch Casino actively promotes the Gambling Helpline and other free problem gambling counselling service contact details through its host responsibility resources. Customers demonstrating

potentially harmful behaviour are encouraged to contact these services. All excluded customers, and third parties who contact Christchurch Casino about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

Christchurch Casino has a host responsibility section on its website.

**Display of game rules, permissible bets and payment of winning bets for table games**

Information is made available to customers that pertain to game rules, permissible bets and payment of winning bets as required by section 175 of the Act.

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies minimum and maximum bets, and payments of winning bets. Signage is also displayed stating that employees are unable to accept tips.

**Display of game rules, permissible bets and payment of winning bets for electronic gaming machines**

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the "Taking the Mystery out of the Machine" brochure, which is available in the gambling area.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, an appropriate gaming employee will explain this and can provide a "How to play" brochure to assist.

**Display of game rules, odds of winning and information on problem gambling for Fun Play tables**

Information is made available to customers that pertains to game rules, odds of winning and information on problem gambling.

Whenever a Fun Play table is open, information is displayed which advises customers that the game rules for the game are available upon request, and odds of winning and information on problem gambling.

### **Information requests by customers**

Customers seeking further clarification of game rules will be shown where in the gambling area copies of game rules are available.

### **Information on gambling activity**

Loyalty card players will be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

Non-loyalty carded players will be provided, on request, with as much information as is available to us on their gambling activity.

## **2.9 Learning and development**

### **Introduction**

Christchurch Casino is committed to developing employee awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. Christchurch Casino shall comply with its statutory obligations relating to problem gambling awareness training, including as set out in Regulation 12 of the Gambling (Harm Prevention and Minimisation) Regulations 2004.

Christchurch Casino will aim to ensure its learning and development initiatives are appropriate to the needs of its customers and employees.

Christchurch Casino's learning and development initiatives use established models of best-practice and include a training mix of classroom based, and on-the-job coaching. Learning and development resources are tailored depending on the roles and responsibilities of employees, and their required host responsibility customer interactions.

### **Overview of employee roles**

**Frontline employees:** All employees are trained to identify indicators of harm. All employees are expected to refer their observations or indicators of potential concern to a supervisor/manager.

All employees are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Frontline employees have a primary role in being alert to and identifying indicators of harm, and will report observations of concern to a supervisor/manager.

While it is not their primary role, frontline employees are trained and will approach customers themselves in circumstances, for example, where a matter is urgent or a manager/supervisor is not available.

**Supervisor/Manager:** The supervisor/manager is the first point of contact for escalation for indicators of harm. Depending on the circumstances, the supervisor/manager delivers interventions by providing information, advice and assistance to customers or taking other appropriate action(s) to minimise harm.

Supervisors and managers are also responsible for ensuring that all observations of indicators reported to them by employees, and any follow up responses taken are logged and sent to Host Responsibility. Supervisors and managers are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

**Host Responsibility:** Host Responsibility records, collates and analyses all information relating to indicators of problem gambling noted by frontline employees, supervisors and managers. Host Responsibility also records interactions and interventions they undertake themselves. The information is used to undertake a section 309 assessment.

As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken. This may include meeting with customers. Host Responsibility is responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to employees.

## **Learning and development requirements**

### **Induction training (Level 1)**

All employees must participate in classroom-based training (approximately two hours) within a reasonable timeframe of commencement (approximately three months). This training includes:

- responsible service of gambling and alcohol;
- identification of problem gamblers;
- reporting and recording procedures for observations;
- approaching and providing information about problem gambling to players when an authorised person is not available, or the matter is urgent; and
- awareness of employee gambling-related harm.

Christchurch Casino will work to supplement this classroom-based training by ensuring that these employees also complete a written test. A failure to pass will result in the person undergoing further training and re-sitting the test. Follow up recall testing will be undertaken within 6-8 weeks of passing the test. There will also be refresher training as noted below.

Training for employees will be further supplemented by on-the-job coaching and support.

Induction training will generally be classroom based.

### **Training for Supervisors (Level 2)**

Supervisors/Managers from Gaming, Food & Beverage, Security and Surveillance and any other employees where it is believed it will be beneficial, will participate in supplementary Level 2 training (two hours). This training is to be undertaken within 2 months of commencement or promotion to a supervisor position. The training includes information on:

- identification of problem gamblers;
- overview of the legal framework and Host Responsibility Programme;
- initial action with respect to customers requesting problem gambling assistance;
- identification and intervention with respect to excessive alcohol consumption; and
- importance of reporting.

### **Advanced training (Level 3)**

Additional training will also be given to all employees who will be responsible for conducting interventions with customers.

This training includes both theoretical and practical components. The training includes:

- Christchurch Casino's legal and regulatory requirements;
- identification of problem gamblers;
- intervention including brief interventions, de-escalation and motivational interviewing;
- debriefing and employee support;
- problem gambling treatment processes;
- cultural awareness;
- advanced Responsible Service of Alcohol - intervention and slowing service;
- awareness of employee gambling-related harm; and
- suicide awareness.

### **Refresher training**

Christchurch Casino provides department-based/site-wide refresher training on an ongoing basis.

Refresher training is available to all frontline employees and above at Christchurch Casino. Refresher training is provided when a learning and development need is identified or requested, and for those who fail knowledge recall tests.

Christchurch Casino will provide RSA refresher training for frontline employees. Where appropriate Christchurch Casino will work with external agencies to develop this training.

### **General Manager training - Sale and Supply of Alcohol Act**

The Licence Controller Qualification, as required by the Sale and Supply of Alcohol Act, is facilitated through an external provider.

### **Suicide awareness training**

Security Shift Managers are trained to respond to customers who are at risk of suicide. This training may be facilitated by an external provider.

### **Informal learning and development**

As learning and development is an ongoing process, Christchurch Casino provides a range of other opportunities for host responsibility learning to occur. There is an emphasis on sharing information and experiences across Christchurch Casino's portfolio to build host responsibility knowledge. These internal opportunities include:

- internal communications, e.g. employee newsletters; and
- inclusion in business or management processes, e.g. employee meetings and key performance indicators.

### **Evaluation**

Christchurch Casino undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement. These measures include:

- employee training feedback and evaluation forms;
- employee knowledge recall and application of knowledge; and
- analysis of training needs.

## **2.10 Identification of problem gamblers**

A copy of Christchurch Casino's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme. The policy fulfils Christchurch Casino's obligations under the following sections of the Act.

Section 308 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must have a policy for identifying problem gamblers, which includes:

- an acceptable definition of problem gambling;
- indicators of problem gambling in the casino; and
- the steps to be taken in identifying actual or potential problem gamblers.

This policy must be made available upon request. Christchurch Casino must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

Section 309 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) the Self-Exclusion procedure available; and
- (b) any procedures described by Regulations made under the Act.

Section 309 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of the licence holder, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

### **3.0 Monitoring and reporting**

#### **Introduction**

Christchurch Casino will evaluate its performance against the objectives of the Programme.

The Christchurch Casino Host Responsibility Programme is measured and monitored using a range of indicators that are set out below. These indicators reflect the level of activity under the Programme, compliance with legal obligations, and progress against all the Programme objectives as set out in section 1.

The Programme is embedded into the business and specifies Christchurch Casino's minimum requirements in relation to host responsibility obligations. Christchurch Casino is not prevented from trialling and introducing new initiatives in addition to what is specified in the Programme. In consultation with Gambling Commission, any such enhancements may be incorporated into the Programme, prior to the next two-yearly review.

#### **Reports to the Gambling Commission**

Christchurch Casino will report annually to the Commission on the implementation of the Programme. Reports will include the following information:

- a description of the resources put into the core elements of the Programme;

- a description of activities undertaken by Christchurch Casino under the Programme;
- reporting against the measures specified below, including a comparison to previous data where applicable;
- Christchurch Casino's discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the DIA and other meetings held as required; and
- proposed improvements to the Programme.

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
Number of customers about whom there have been observations.	Christchurch Casino	Annual
Number of indicators reported to Host Responsibility.	Christchurch Casino	Annual
Number of approaches to Christchurch Casino by third parties.	Christchurch Casino	Annual
Number of problem gamblers identified (in the first instance) by request for exclusion or forthright disclosure, compared to number of problem gamblers identified by the casino.	Christchurch Casino	Annual
Number of customers in Host Responsibility log.	Christchurch Casino	Annual
Number of GOI files by: (a) ethnicity (b) gender (c) age (d) preferred mode of gambling (tables/EGMs).	Christchurch Casino	Annual
Number of interventions conducted with customers.	Christchurch Casino	Annual
Number of approaches to customers to offer information about self-exclusion.	Christchurch Casino	Annual

Number of exclusions by:	Christchurch Casino	Annual
(h) ethnicity		
(i) gender		
(j) age		
(k) preferred mode of gambling		
(l) prompted by third party disclosures		
(m) exclusion type (self/Christchurch Casino)		
(n) timeframe		
(o) following re-entry.		
Number of customers participating in multi venue exclusions.	Christchurch Casino	Annual
Number of customers participating in multi casino exclusions.	Christchurch Casino	Annual
Number of customers participating in Pre-Commitment.	Christchurch Casino	Annual
Number of excluded customers agreeing to be contacted by help services on exclusion form.	Christchurch Casino	Annual
Number of breaches of exclusion by:	Christchurch Casino	Annual
(u) ethnicity		
(v) gender		
(w) age		
Number of successful and unsuccessful applications to re-enter following exclusion.	Christchurch Casino	Annual
Number of persons trespassed or required to leave for making loans for financial gain.	Christchurch Casino	Annual
Number of customers enrolled to use SET.	Christchurch Casino	Annual
Number of customers with GOI file opened after enrolling to use SET.	Christchurch Casino	Annual
Number of customers Casino-Excluded or Self-Excluded after enrolling to use SET.	Christchurch Casino	Annual
<b>Measures relating to responsible consumption of alcohol</b>		
Number of "Under the Influence" (UTI) incidents (internal report).	Christchurch Casino	Annual
Number of requests for people to leave due to the amount of alcohol consumed.	Christchurch Casino	Annual

Number of Police contacts citing Christchurch Casino as venue where their last drink was served.	Police Alcolink database	Annual
<b>Measures relating to employee training</b>		
Level 1 courses Level 2 courses Level 3 courses Refresher training Number of employees who need to be trained in each category, and proportion of those employees that have completed the appropriate level training.	Christchurch Casino	Annual
1. Employee recall of knowledge and behaviours related to host responsibility and associated policies and procedures.	Christchurch Casino	Annual
2. Employees' perceptions on the effectiveness of the Employee Gambling Harm Programme.	Christchurch Casino	Annual
Results of tests conducted by employees relating to host responsibility and associated policies and procedures.	Course Evaluations	Annual
Employees' perceptions of the effectiveness of training.	Course Evaluations	Annual
<b>Other Programme activity and compliance-related measures</b>		
Number of internal and external underage incidents.	Christchurch Casino	Annual
Number of unaccompanied children.	Christchurch Casino	Annual
Number of unaccompanied children where the care giver is gambling.	Christchurch Casino	Annual
Number of supervised children.	Christchurch Casino	Annual
Number of supervised children in our surrounds where the care giver is gambling.	Christchurch Casino	Annual
Number of people trespassed or requested to leave the casino for other reasons.	Christchurch Casino	Annual

**Appendix A - Current Host Responsibility Resources**

**(as at June 2017)**

***Brochures***

**"PlaySafe DrinkSafe"**

Aimed at encouraging customers to play and drink safely while at Christchurch Casino. The brochure is translated to reflect our customers.

- Translations include;
  - Chinese
  - Korean
  - Other languages as suggested by the demographic figures

**"Your guide to understanding gaming machines"**

Aimed to help customers make informed decisions about their gambling, it also provides an understanding about odds of winning or losing.

**"PlaySafe DrinkSafe - not just for our customers"**

Now a part of our employee manual this advisory offers tips on how to have a great night out safely; employees can take the 'eight screen' and assess themselves; and it provides a number of options if they need to speak with someone.

**"Unaccompanied Children - not even for a minute"**

The brochure outlines NZ law and the measures Christchurch Casino will undertake if a child is found unsupervised in any area around the environs of the casino.

**"Your guide to setting Playing Limits on gaming machines"**

Wallet card sized brochure providing the reader with a guide to setting expenditure and/or time limits using the Pre-commitment facility on gaming machines.

**Signage**

**Customer Care - Code of Conduct**

Displayed on each level; emphasising the casino's commitment to providing a safe gambling environment.

**DrinkSafe**

Aimed at encouraging customers to consume alcohol responsibly while at Christchurch Casino

**PlaySafe**

Aimed at encouraging customers to play safely while at Christchurch Casino, displays the 0800 Gambling Helpline.

Concerned about your own or someone else's gambling?

A self-help poster promoting host responsibility and helpline contact details.

**Responsible service of alcohol policy:**

Displayed in all bars for customer to read, it is often used as a reference tool for employees serving alcohol.

**Conditions of entry:**

Displayed at the primary entrance emphasising the casino's expectation concerning appropriate dress and behaviour; it also outlines the restricted age limit (20+).

**PlaySafe DrinkSafe 'not just for our customers':**

Displayed back of house; encouraging employees to consider the impacts of their gambling and drinking.

**Appendix F Details of Input-Output economic modelling: Calculating the Economic Impacts of Christchurch Casino using Input – Output Models**

Christchurch City and Canterbury region input-output models were developed using the non-survey GRIT techniques described in Butcher<sup>2</sup>. The models were then expanded to incorporate a "Christchurch Casino" industry. The structure of the industry was based on average financial accounts of Christchurch Casino Ltd for the three years to 31 March 2017. Casino expenditure was allocated to a local industry, or a primary input including imports. The allocation was based on a detailed study of all purchases and payments made by the Casino over the two years to March 2016. Purchases were broken down by supplier, with each supplier being allocated to a region, depending on its location, and to an industry group, based on information from the Casino accounting staff or the supplier on the nature of the input being supplied. In many cases the suppliers are retailers, and in such cases the retail margin was allocated to the appropriate retail industry group in the supplier's region, and the item being sold was assumed to be a mix of imports and local production. While this mix is an approximation, sensitivity testing shows that it did not significantly affect estimates of economic impacts.

Payments of wages and salaries were split between geographic supplying regions (Christchurch, Rest of Canterbury, Rest of New Zealand) based on personnel records.

Payments to the Department of Internal Affairs were split with one quarter being allocated to Christchurch, to allow for the fact that two FTE DIA staff are employed in Christchurch to oversee the Casino, and the balance being allocated to Rest of New Zealand to cover central government's expenses of managing gambling. Payments of Fringe Benefit Tax were treated as part of Household Income, while payment of Casino Duty was treated as a Tax on Production. Company income tax and interest were included with profit as part of Operating Surplus.

Once the casino "industry" had been incorporated into the Input-Output model, Type II

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<sup>2</sup> Regional Income, Output and Employment Multipliers: Their Uses & Estimates of Them.  
Vol.4 of the Cost Benefit Handbook. Ministry of Agriculture and Fisheries, Wellington, 1985.

multipliers<sup>3</sup> were calculated in the normal manner and were applied to the direct economic impacts of the casino to estimate total economic impacts.

An assessment of national economic impacts was made using a similar approach, with the modification that all tax and profits were assumed to be reflected in additional household spending. This parallels the assumption made in the macro-economic models which assume no change in the government budget position and the balance of payments position. This modification leads to a considerably larger value added multiplier (2.16) than is generated using the more conventional assumption, in I-O modelling, that additional taxes and profits are assumed to be leakages from the system (1.61). The national value added impact estimated through this national I-O analysis (\$98 million / year) is less than was estimated in the macro-economic General Equilibrium Modelling analysis (\$116 million / year) of the Christchurch casino, undertaken by Infometrics.

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<sup>3</sup> Multiplier effects are the flow-on effects on other businesses as the Casino makes purchases and as Casino employees spend their household incomes. For example, the Casino purchases laundry services, the laundry service increases its production and purchases soap powder from retailers and employs more staff, the retailers employ more staff and purchase electricity; the various wages from all these producers are used to buy consumption goods and services; producers of those goods and services expand their employment and production, and so on. A type II multiplier includes both the impacts generated by the Casino's purchase and the impacts generated by household expenditure of the additional income earned as a result of the operations of the Casino.

**Appendix G Casino patron survey - questionnaire**

We are researching the economic effects of the Christchurch Casino on the communities of Christchurch and Canterbury, based on what has actually been experienced in the past.

This research is required by the Gambling Commission and commissioned by Christchurch Casino Ltd.

Collecting primary data from those who visit the Casino is a major part of understanding this impact. We want to know what activities, if any, you would have undertaken instead had you not come to the casino, and if you are a visitor to Christchurch we want to know how it affected the duration of your stay in the city, in Canterbury and in New Zealand

Your individual responses will be treated in absolute confidence by the researchers.

We would be grateful for your participation in this research. However, you are entitled to withdraw from this research at any stage if you choose to do so.

Only aggregated results will be published.

**Personal:**

1. Where do you come from and have we already interviewed you?
  - i. Interviewed already: YES  NO
  - ii. From: Christchurch  If not interviewed Go to Q 5  
Other Canterbury  If not interviewed Go to Q 2  
Other NZ  If not interviewed Go to Q 2  
Overseas
- a) Which Country are you from \_\_\_\_\_
- b) How long do you expect to be in NZ?
  - Less than year  If not interviewed go to Q 3
  - More than year  If not interviewed Go to Q 2a

If already interviewed ---- Thank you for stopping but we now have the information we need.

**Visitors to Christchurch**

2. What kind of accommodation are you staying in while in ChCh?
  - a. Hotel
  - b. Motel
  - c. Backpackers
  - d. Campground / camper van
  - e. Private rental / e.g. Air BnB
  - f. Staying with a friend or relative
  - g. Not Staying Overnight
3. How long do you expect to stay in Christchurch on this visit?  
One day only (zero nights) OR Number of nights \_\_\_\_\_ 4.  
Would you have stayed LESS time if the Christchurch Casino was not here?  
YES ? NO ?  
If yes, how much less?  
Few Hours / 1.2 day  
One day only less (zero nights) OR Number of nights less \_\_\_\_\_

**People who live in New Zealand, including Christchurch.**

5. If you live in New Zealand, how often do you think you visit any Casino on average?
- i. Daily or more than once a week
  - ii. About once a week
  - iii. Fortnightly - 2 times per month
  - iv. About once a month
  - v. 2-6 times per year
  - vi. 6-12 times per year
  - vii. About once a year
  - viii. About once every 3 - 5 years
  - ix. Less often than that
  - x. Don't know

**People who live in Christchurch**

6. If you live in Christchurch, how often do you think you come to the Christchurch Casino to gamble on average?
- i. Daily or more than once a week
  - ii. About once a week
  - iii. Fortnightly - 2 times per month
  - iv. About once a month
  - v. 2-6 times per year
  - vi. 6-12 times per year
  - vii. About once a year
  - viii. About once every 3 - 5 years
  - ix. Less often than that
  - x. Don't know

**ALL RESPONDENTS**

7. Which of the following activities do you expect to be involved with at the Christchurch Casino today

- a. Restaurants ? Go to 8 a
- b. Bars ? Go to 8 a
- c. Gaming ? Go to 8 b
- d. Just looking ? Go to 8 a.

8. Thinking about this visit to the casino, if you had not come to the Christchurch Casino today, what do you think you would have done instead?

[Interviewer: Based on response to Q 8 above. Select either a and/or b below]

a. Instead of visiting the Restaurant or Bar or just looking on this visit would you have.

		In CHCH	Outside CHCH	No specific area
i.	Gone to a bar / restaurant			
ii.	Gone to a movie / play / concert			
iii.	Gone shopping			
iv.	Undertaken some other commercial activity. Please specify:			
v.	Undertaken non-commercial activity			
vi.	Stayed at home or in accommodation			
vii.	Not sure			

b. Instead of Gaming at the Christchurch Casino on this visit would you have

		In CHCH	Outside CHCH	No specific area
i	Gone to a different place for gaming.			
ii	Visited the Christchurch Casino for some other activity			
iii	Gone to another bar or restaurant			
iv	Gone to a movie / play / concert			
v	Gone shopping			
vi	Undertaken some other commercial activity. <b>Please specify:</b>			
vii	Undertaken non-commercial activity			
viii	Stayed at home or in accommodation			
ix	Not sure			
x	Other - specify:			

**For respondents who are Gaming at the Casino**

9. If the Casino in Christchurch were not here, would you be likely to gamble at other places in Christchurch? *[tick as many as apply]*

**Note to interviewer. this is a general question. Not specific to this visit.**

- Yes  at a club  
 at a pub  
 at the races  
 on-line betting  
 buy some/more lotto tickets  
 other please specify:

No

10. Are you a member of the Christchurch Casino Players Club?

- Yes   
 No

**Background Information**

**Gender:** **Male / Female** (circle relevant)

**Age:** 20 – 40  40 - 60  60 +

**Ethnicity** (Circle relevant group). What ethnicity do you most identify with?

1. New Zealand European
2. Maori
3. Pasifika
4. Chinese
5. Other Asian
6. Other (please state)

-----  
**Other interviewer notes: e.g motivation for being in the casino – socialization, warmth, security etc. etc.**

THANK YOU FOR YOUR PARTICIPATION.

**Appendix H      Infometrics Report**

The Wider Economic Impacts of Christchurch Casino  
Prepared by Infometrics for Butcher Partners Ltd, August 2017

Contents

- 1. Summary
- 2. Methodology
  - ESSAM Model
  - Reference Scenario
  - Model Closure
- 3. Casino Scenarios
  - Appendix A: ESSAM Model
  - Model Structure

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**1. Summary**

Infometrics was asked by Butcher Partners Ltd to investigate the economy-wide economic impacts of the closure of the Christchurch casino. For technical modelling reasons we analyse a casino expansion, but the impacts per dollar of revenue are very similar, although of course of the opposite sign. For commercial confidentiality reasons, the revenue was assumed to be \$100 million per year. Differences between actual and modelled turnover will mean that the results presented here will need to scaled pro-rata to reflect results of specific casino revenue.

For an increase in casino revenue (gambling revenue less payout, plus revenue from ancillary services) of \$100m, the change in real gross national disposable income - a measure of national economic benefit - is between \$116m and \$240m, depending on the nature of the flow-on effects that might ensue. The flow-on effects are largely attributable to the casino paying a higher wage rate than paid by other industries, particularly those in hospitality, plus the relatively low requirements of physical capital (buildings and equipment) per unit of output. There is also a small increase in foreign exchange earnings from additional net spending by international tourists.

Although the analysis is at the level of the whole economy, most of the economic effects are likely to be noticed in the Canterbury region. Effects are transmitted to other regions through imports from those regions and through the movement of labour in response to changing employment opportunities.

## **2. Methodology**

We use the ESSAM general equilibrium model of the New Zealand economy to investigate the economy-wide economic impact of an expansion in casino activity.

We do not consider whether the costs of any problem gambling that may or may not arise from an expansion in casino activity are covered by the taxes and levies paid by casinos.

### ***ESSAM Model***

The ESSAM model is a multi-industry computable general equilibrium (CGE) model of the New Zealand economy. An outline is provided in Appendix A. As with any model, CGE models can only be an approximation of the highly complex real economy. Therefore the results can only ever be indicative. The interpretation of CGE results should centre on their direction (up or down) and broad magnitude (small, medium or large), rather than on the precise point estimates that the model produces. Essentially we are modelling scenarios: such modelling "does not predict what will happen in the future. Rather, it is an assessment of what could happen in the future, given the structure of the models and input assumptions"

There are a number of advantages to using a general equilibrium model rather than a standard multiplier analysis:

- No assumption that factors of production are in excess supply.
- Allows for price changes (such as if a factor is in limited supply) which may lead producers to change inputs, thereby altering their production structure and hence the implied economic multipliers.
- Does not force average relationships to hold at the margin.
- Automatically calculates net multiplier effects by reducing the gross effects to the extent that they pull resources out of other productive uses (an effect frequently known as trade diversion).

These features mean that there is no guarantee that the shock delivered to the model (in this case an expansion in casino activity) will produce net positive economic effects. A gain in economic welfare will occur if there is an increase in productive efficiency or an improvement in allocative efficiency - resources used by industries where they generate most value to consumers.

### ***Reference Scenario***

The model is used to produce a Reference scenario for 2020 which is a theoretical construct of what the economy might look like at future points in time without any major changes in policy or major exogenous economic shocks. The function of the Reference scenario is purely to act as a point of comparison against which other scenarios can be compared.

### ***Model Closure***

The following model closure rules are adopted for the alternative scenarios, consistent with generally accepted modelling practice:

1. The current account balance is fixed as a percentage of GDP. This means for example that if more foreign tourists lead to higher export revenue, that revenue is available for spending on imports of goods and services.

2. The post-tax rate of return on investment is unchanged between scenarios, with gross fixed capital formation being endogenous. This acknowledges that New Zealand is part of the international capital market and ensures consistency with the preceding closure rule. We also look at a scenario where gross fixed capital formation is fixed between scenarios.
3. Any change in the demand for labour is reflected in changes in wage rates, not changes in employment. It is possible to fix wage rates at Reference scenario levels, but this would imply that the long run level of total employment is driven more by casino activity than by the forces of labour supply and demand, which we consider unlikely.
4. The fiscal balance is fixed across scenarios with personal income tax rates being the default equilibrating mechanism. Other options are possible.

### **3. Casino Scenarios**

We look at a hypothetical introduction of a Christchurch casino that generates revenue (total 'drop' less payout, plus ancillary revenue ) of \$100m. This value is purely to present the model with a meaningful shock. Actual revenue is likely to be different, and the changes estimated here would alter proportionately. Although we have, for technical reasons, modelled a casino expansion, the results of closing the existing casino would be roughly the same per \$million of revenue, although of course of the opposite sign.

The cost structure for casino operation uses data provided by the client. Sales are approximately 80% to New Zealand visitors and 20% to foreign tourists. There is also a small expansion in foreign tourism spending of 0.06%.

Table 1 presents a summary of the results in terms of the incremental effect on various macroeconomic measures. Under the standard capital closure assumption in CGE models, investment responds to changes in the post-tax rate of return. Arguably, however, this is more of a long run response. In the short run resources are less mobile and, in the case of a firm reducing the scale of its operations, under-utilised capital assets could eventuate.

**Table 1: Macroeconomic Results 2020**

	Standard capital closure		Short run capital closure	
	Change on Reference Scenario			
	(\$m)	(%)	(\$m)	(%)
Private consumption	190	0.12	91	0.06
Investment	57	0.09	28	0.04
Exports	71	0.10	34	0.05
Imports	41	0.07	21	0.03
GDP	278	0.10	134	0.05
RGNDI	242	0.09	116	0.04
Real wage rate	0.07		0.00	

In the short run scenario private consumption is \$91m (0.06%) higher and RGNDI is \$116m (0.04%) higher relative to the reference scenario. Of the \$100m casino revenue, about \$75m is value added. Thus the implied value added multiplier is about 1.55 , which is comparable to standard multipliers derived from input-output tables.

The multiplier effects are largely attributable to the casino paying a higher wage rate than paid by other industries, particularly those in hospitality, plus the government using its additional revenue to reduce personal income tax rates, which further stimulates private consumption.

In the longer term there are additional flow-on effects stemming from the relatively low requirements of physical capital (buildings and equipment) per unit of output in the casino industry, plus the additional gross fixed capital formation required in industries that supply the casino. (There is no guarantee that these effects are net positive for the economy; they rely on casino operation generating more value added than the expenditure it replaces).

Allowing for such longer term reactions roughly doubles the macroeconomic effects. For example RGNDI rises by \$242m, or 0.09%. The main component of the change in RGNDI is the change in GDP, which rises by an extra 0.05%, a direct result of the expansion in the economy's capital stock that occurs when investment responds to changes in the rate of return.

**Caveats**

Four caveats should be noted:

1. As noted above the \$100m is chosen to provide the model with a meaningful shock. Linear scaling of results will be approximately correct for other amounts, but for much smaller shocks the general equilibrium results would be less reliable.
2. Greater spending by New Zealand residents at the casino has been simulated by moving the household consumer demand curve to the right, but we cannot claim that this necessarily reflects true consumer preferences.
3. We do not consider whether the costs of any problem gambling that may or may not arise from an expansion in casino activity are covered by the taxes and levies paid by the activity.
4. Although closure of an existing casino has roughly the same, but opposite impacts per dollar of revenue as an expansion, this does depend on labour that is displaced by the casino and its suppliers being able to find other jobs fairly quickly - within a year or so.

***Appendix 1: ESSAM Model***

The ESSAM (Energy Substitution, Social Accounting Matrix) model is a general equilibrium model of the New Zealand economy. It takes into account the main inter-dependencies in the economy, such as flows of goods from one industry to another, plus the passing on of higher costs in one industry into prices and thence the costs of other industries.

The ESSAM model has previously been used to analyse the economy-wide and industry specific effects of a wide range of issues. For example:

- Analysis of the New Zealand Emissions Trading Scheme and other options to reduce greenhouse gas emissions
- Changes in import tariffs
- Faster technological progress
- Funding regimes for investment in roads
- Release of genetically modified organisms

Some of the model's features are:

- 55 industry groups, as detailed in the table below.
- Substitution between inputs into production - labour, capital, materials, energy.
- Four energy types: coal, oil, gas and electricity, between which substitution is also allowed.
- Substitution between goods and services used by households.
- Social accounting matrix (SAM) for tracking financial flows between households, government, business and the rest of the world.

The model's output is extremely comprehensive, covering the standard collection of macroeconomic and industry variables:

- GDP, private consumption, exports and imports, employment, etc.
- Demand for goods and services by industry, government, households and the rest of the world.

- Industry data on output, employment, exports etc.
- Import-domestic shares.
- Fiscal effects.

### ***Model Structure***

#### Production Functions

These equations determine how much output can be produced with given amounts of inputs. For most industries a two-level standard translog specification is used which distinguishes four factors of production - capital, labour, and materials and energy, with energy split into coal, oil, natural gas and electricity.

#### Intermediate Demand

A composite commodity is defined which is made up of imperfectly substitutable domestic and imported components - where relevant. The share of each of these components is determined by the elasticity of substitution between them and by relative prices.

#### Price Determination

The price of industry output is determined by the cost of factor inputs (labour and capital), domestic and imported intermediate inputs, and tax payments (including tariffs). World prices are not affected by New Zealand purchases or sales abroad.

#### Consumption Expenditure

This is divided into Government Consumption and Private Consumption. For the latter eight household commodity categories are identified, and spending on these is modelled using price and income elasticities in an AIDS framework. An industry by commodity conversion matrix translates the demand for commodities into industry output requirements and also allows import-domestic substitution.

Government Consumption is usually either a fixed proportion of GDP or is set exogenously. Where the budget balance is exogenous, either tax rates or transfer payments are assumed to be endogenous.

#### Stocks

The industry composition of stock change is set at the base year mix, although variation is permitted in the import-domestic composition. Total stock change is exogenously set as a proportion of GDP, domestic absorption or some similar macroeconomic aggregate.

### Investment

Industry investment is related to the rate of capital accumulation over the model's projection period as revealed by demand for capital in the horizon year. Allowance is made for depreciation in a putty-clay model so that capital cannot be reallocated from one industry to another faster than the rate of depreciation in the source industry. Rental rates or the service price of capital (analogous to wage rates for labour) also affect capital formation. Investment by industry of demand is converted into investment by industry of supply using a capital input- output table. Again, import-domestic substitution is possible between sources of supply.

### Exports

These are determined from overseas export demand functions in relation to world prices and domestic prices inclusive of possible export subsidies, adjusted by the exchange rate. It is also possible to set export quantities exogenously.

### Supply-Demand Identities

Supply-demand balances are required to clear all product markets. Domestic output must equate to the demand stemming from consumption, investment, stocks, exports and intermediate requirements.

### Balance of Payments

Receipts from exports plus net capital inflows (or borrowing) must be equal to payments for imports; each item being measured in domestic currency net of subsidies or tariffs.

### Factor Market Balance

In cases where total employment of a factor is exogenous, factor price relativities (for wages and rental rates) are usually fixed so that all factor prices adjust equi-proportionally to achieve the set target.

### Income-Expenditure Identity

Total expenditure on domestically consumed final demand must be equal to the income generated by labour, capital, taxation, tariffs, and net capital inflows. Similarly, income and expenditure flows must balance between the five sectors identified in the model - business, household, government, foreign and capital.

### Industry Classification

The 55 industries identified in the standard ESSAM model are defined on the following page. Industries definitions are according to Australian and New Zealand Standard Industrial Classification (ANZSIC06).

Input-Output Table

The model is based on Statistics New Zealand's latest input-output table which relates to 2012/13, plus associated data on demographics, trade, and national accounts.

Model Industries

	Abbrev	Description
1	HFRG	Horticulture and fruit growing
2	SBLC	Sheep, beef, livestock and cropping
3	DAIF	Dairy and cattle farming
4	OTHF	Other farming
5	SAHF	Services to agriculture, hunting and trapping
6	FOLO	Forestry and logging
7	FISH	Fishing
8	COAL	Coal mining
9	OIGA	Oil and gas extraction, production & distribution
10	OMIN	Other Mining and quarrying
11	MEAT	Meat manufacturing
12	DAIR	Dairy manufacturing
13	OFOD	Other food manufacturing
14	BEVT	Beverage, malt and tobacco manufacturing
15	TCFL	Textiles and apparel manufacturing
16	WOOD	Wood product manufacturing
17	PAPR	Paper and paper product manufacturing
18	PRNT	Printing, publishing and recorded media
19	PETR	Petroleum refining, product manufacturing
20	CHEM	Other industrial chemical manufacturing
21	FERT	Fertiliser
22	RBPL	Rubber, plastic and other chemical product manufacturing
23	NMMP	Non-metallic mineral product manufacturing
24	BASM	Basic metal manufacturing
25	FABM	Structural, sheet and fabricated metal product manufacturing
26	MAEQ	Machinery and other equipment manufacturing
27	OMFG	Furniture and other manufacturing
28	EGEN	Electricity generation

29	EDIS	Electricity transmission and distribution
30	WATS	Water supply
31	WAST	Sewerage, drainage and waste disposal services
32	CONS	Construction
33	TRDE	Wholesale and retail trade
34	ACCR	Accommodation, restaurants and bars
35	ROAD	Road transport
36	RAIL	Rail transport
37	WATR	Water transport
38	AIRS	Air Transport
39	TRNS	Transport services
40	PUBI	Publication and broadcasting
41	COMM	Communication services
42	FIIN	Finance and insurance
43	HIRE	Hiring and rental services
44	REES	Real estate services
45	OWND	Ownership of owner-occupied dwellings
46	SPBS	Scientific research and computer services
47	OBUS	Other business services
48	GOVC	Central government administration and defence
49	GOVL	Local government administration
50	SCHL	Pre-school, primary and secondary education
51	OEDU	Other education
52	MEDC	Medical and care services
53	CULT	Cultural and recreational services
54	REPM	Repairs and maintenance
55	PERS	Personal services

**Appendix I Distribution of staff respondents across departments/functions in the Casino**

<b>Main Division</b>	<b>Sub-groups</b>	<b>Number of respondents (Total employees)</b>
Gaming	Gaming	48 (154)
Food & Beverage Services	Aspinall Restaurant	4 (6)
	Grand Cafe	11 (18)
	Valley Bar	4 (17)
	Monza Sports Bar	2 (11)
	Sixty/6	1 (12)
	Staff Canteen	2 (8)
	Kitchen	2 (44)
	F&B Admin	6 (29)
	Marketing & Customer Loyalty	Customer Services
Drivers		2 (5)
Security & Surveillance	Security	8 (29)
	Surveillance	13 (16)
Building Services	Housekeeping	5 (23)
	Maintenance	3 (5)
	Stores	3 (3)
Finance	Finance	5 (6)
	Cage	16 (33)
Human Resources	Human Resources	5 (5)
Information Services	Information Services	2 (3)
I-site	I-site	1 (7)
Executive	Executive	2

**Appendix J          Anonymised comments - attitudes of Christchurch residents towards the Casino**

Section 5.4 discusses the expressed attitudes of Christchurch residents to the Casino, as revealed in responses to several surveys.

The anonymised comments are listed below. They have been grouped under several themes, being respondents' perceptions of -

- the Casino's role in the community,
- the Casino management and staff,
- the Casino social/host responsibility,
- the Casino's role in the City generally,
- the Casino's role in the City's tourism sector particularly,
- the Casino's role in organisational networking.

**Comments from Charitable Trust recipients**

Casino's perceived role in the community –

- *the casino is a significant grant giving enterprise – it was an eye opener at the cheque giving ceremony*
- *we would like to say thank you for what they do in the community*
- *if I go back 25 years, I would say we don't need a casino – that's my value system, but some would argue it makes a vibrant community and what's the difference between spending money at a casino versus money at the movies if there is no harm involved? I recognise that there are different view points*
- *as a citizen, I believe the casino has a right to exist, for most it is harmless*
- *it is a good facility for Christchurch*
- *the casino is an integral part of Christchurch city now – they put a lot into the community*
- *if it is a good heart beat for the community then it affects all of Christchurch in a good way and there is more to it than financial gain*

Casino management and staff –

- *our close personal relationship with Brett is crucial as it helps Brett understand what our organisation needs (which he often responds to) and his knowledge is then shared with others which equates to advocacy of our organisation*
- *our relationship with the casino is of value to us, we have a closer relationship now, e.g. with Brett. I feel if we had a need we could approach them and ask for support, especially non-monetary support*
- *it is one of the few events where we are publicly acknowledged, thanked and spoken to warmly - they are very personable*
- *casino staff are very nice friendly people who are all good to work with*
- *the casino connects us with other like-minded organisations due to the relationship with Brett which is a positive spin off*
- *staff and leadership are focused on commitment to the community*

Casino social/host responsibility –

- *we appreciate the fact that they give back to the community, I'm sure they don't want to be responsible for harm in the community and it's great that they give to those in the community who can help*
- *the casino acts responsibly (I've seen people banned)*
- *there is some correlation between gambling and family violence. Whilst not a legal obligation, there should be a moral obligation to contribute more money back to the community. Whilst we are really appreciative of their support, they could do more – it should be re visited and looked at percentages of profit casinos are required to give to the community*
- *we believe they should give much more money to charity, it should go back to the community, especially to organisations and people dealing with problem gambling*
- *the casino assists organisations in Christchurch to get financial help*
- *the casino may be partly perceived as a nuisance in the community but it is very generous*
- *pokey machine addicts are the real issue in Christchurch, the casino cannot control what is outside of their sphere and what they can control they do so to a very high order.*

**Comments from businesses that provide goods or services to the Casino**

Comments on Casino's role in the city -

For the city generally

- *With Christchurch still undergoing major repairs from the earthquakes, we can ill afford to lose another attraction in the city; it draws the public in to other businesses in the area*
- *...important for the city - helps to keep people in the city centre; Casino is one of the few attractions*
- *for a meal and to watch sport after hours, it's a great place to watch live sport with a group of friends*
- *we notice elderly going at lunchtime and afternoon teas*
- *the Casino is an anchor building in the Victoria Street precinct which is shortly to benefit from a major upgrade in streetscape and public space. The Casino's front-of-house makes a useful contribution to the street scene and will integrate with the new street works. It would be unfortunate if this was not to continue.*
- *the Casino is a big drawcard for Christchurch as a whole. A lot of those businesses in Victoria Street would not exist if it were not for the Casino.*
- *the Casino is part of the CBD*
- *I think it is good for Canterbury, especially during the rebuild when there is nothing else around. I think it is an essential part of what we do here.*
- *the Christchurch Casino is more of an entertainment venue compared with the Auckland casino because it has separate areas from gambling - accessible "family areas"*
- *I don't think its closure would in any way whatsoever be beneficial to Christchurch simply because of the large number of people it employs and the number of tourists it attracts through its doors, including benefits to businesses in its vicinity (e.g motels).*
- *Possible closure sounds terrible - we are a big city - we should have a casino.*
- *From a ratepayers perspective I think it was good they elected to stay open post earthquake as it provided some normality and gave people a place to go, especially when a lot of businesses walked away.*

For tourism

- *we are supportive of the Casino - a good venue for tourists*
- *The Casino is a key attraction for overseas visitors*
- *It is a destination for visitors*

- *the Casino plays an important role in the growth of the hotel and accommodation sector.*
- *Their presence helps grow the attraction of the city - all of that creates more jobs and the sector can only flourish*
- *wouldn't like to see them close as I think they are good for Christchurch and good for tourism.*

For the community

- *the Christchurch Casino supports a lot of community organisations - it is outstanding.*
- *the Casino supports community events.*
- *I see that they sponsor quite a few events in the city and I always think it is good to see them putting money back into the community and providing that support.*

Comments on the management and staff of the casino

- *good to do business with; people we deal with currently are a pleasure to deal with*
- *good pro-active customers willing to try new things and their business is good for us*
- *I would be upset if it closed as we do a lot of work for the Casino and can see the potential for future work that we can be a part of; they are also such a nice crowd to work with; the CEO is great*
- *we have a very good relationship with management at the Casino*
- *the Casino operates with huge integrity which is very important to us*
- *if our staff are thirsty or hungry, food on the job is offered to our staff while working; we have a very good working relationship*
- *the CEO is a good leader. The Casino has strict policies, insisting on a contractors card for workers*
- *very thorough*
- *the Casino are very organised - a professional company to deal with; of all the 250 organisations we deal with, the Casino is in the top 2 in terms of professionalism*
- *the way they operate their IT is very respectful*
- *we like being associated with the Casino - gives legitimacy to our business*
- *very loyal, very trusting - not a lot of the "Big Boys" do this.*
- *I have found the Casino to be very professional and they have a very high calibre of staff at management level.*
- *they take the welfare of patrons and staff at the Casino very seriously.*
- *they are a fair and decent employer; they endeavour to do the best by their team; they want to fit in with the needs of staff (e.g. re hours of work) by meeting them half way.*
- *They are very professional; we regard it as a privilege to supply them.*

Comments on the Casino's social responsibility/gambling HR within the Casino

- *Personally I think the Casino is fine and for the majority of people causes no harm*
- *they are very responsible with their slot machines*
- *The Casino is very good with social responsibility and its security and reporting systems; its day-to-day activities and monitoring of gamblers is very thorough*
- *I have been to Casino functions and observe they are very responsible with age limits compared with other gaming options in town.*
- *the rules are very strict in the Casino sector; they are incredibly responsible in the way they deal with these rules; they have processes in place to ensure that nothing gets through that doesn't abide by these rules.*
- *they take responsible gambling very seriously and have made some key decisions in regards to following through with their host responsibility obligations and making sure staff meet those obligations.*
- *they are very specific about what behaviour they expect.*
- *They market our products properly and are aware of liquor and gambling tolerances and this makes them the most professional business we deal with.*

**Comments from the recipient organisation's of Casino corporate sponsorship**

Comments on Casino's role in the city -

For the city generally

- *our relationship with the Casino is important in various ways: promoting ..... is critical to Christchurch and Canterbury.*
- *we offer them 'visibility' by our supporters using their facility ..... - a symbiotic relationship. It would be a significant loss to Christchurch as a whole and to the entertainment precinct.*
- *personally, I've dealt with the Casino since it opened; Victoria Street and the Casino is a social hub. in the past (pre-quakes) ..... used to host suppers ..... at the Casino ....; it's part of an environment of cross-over entertainments in the central city - the more activity the better - the Casino's on-going presence is important; it is a safe environment; it would create a vibrancy and work well with the performing arts precinct of the future.*
- *the casino is an asset to the city - a cool place to go for dinner and for entertainment.*
- *without the Casino, there would be major impacts for events in this city.*

*- it would be a tragedy if the Casino closed - the performing arts precinct for entertainment with the Casino a part of this scene is important for Christchurch's redevelopment.*

For tourism

*- it's important that Christchurch is able to attract tourists to responsible entertainment venues  
- Christchurch needs the Casino for overseas tourists*

For organisational networking

*- we have had a relationship with the Casino since Day One. We run frequent events at the Casino for our other sponsors. We hold a function there every two weeks of the year, often at Sixty/6; and the carpark adjacent is great.  
- we have had a relationship with the Casino for a very long time; the geographic connection between the Casino and the Town Hall was a very important factor for our strong links when the Casino first opened. We usually put on one event per year at the Casino, with the Casino contributing prizes to the fund-raising auction.  
- we really value working with the Casino for a great city post earthquake. everyone in the business world sees that collaboration is vital.*

For the community

*- the Casino also gets an allocation of tickets to ..... for their clients to attend. It's a good message to our community to have the local casino supporting us.  
- the Casino team is very loyal to the Canterbury community; its CEO is very supportive of women's sport;  
- Casino management have been great to work with; they are fully supportive of the work we are doing in the community.  
- The Casino is a safe environment to be in - provides a 24-hour service.*

Comments on the management and staff of the casino - professionalism, relationships

*- a big plus for us is to be able to work with Casino staff for their advice and expertise in marketing and liquor licensing - it's a terrific partnership, a working sponsorship; their CEO is a very positive influence.  
- the Casino is very professional.*

- *we align ourselves with people/businesses who are high-end professional people; most of my staff are female and they enjoy dealing with the Casino staff because of their competence; Casino food and beverage is an extraordinary success. The Casino staff we deal with are all "top notch".*
- *their marketing team is very straightforward and approachable in our experience.*
- *they do a great job; provide a wide range of supports; it is a slick operation; it is profitable and a good business - Christchurch is lucky to have this CEO - runs a great ship - very approachable.*
- *I have been involved in the ..... business for 15 years - have had occasions to deal with the Casino - when they agree, they are professional; supportive across the board; they give money, but also commit staff and resources to the event; staff are always interested in the outcome.*

**Comments from businesses in the immediate vicinity of the Casino**

- *Casino are good neighbours; their security helps look after us as well.*
- *Casino are good neighbours; make the area very safe and secure; see lots of older people visiting - often for daytime lunch or Retirement Village events - these people don't want to go there when it's busy; Sports Bar is another segment of attraction; security staff sometimes suggest to drunk patrons to come to us to get some food and sober up; I think Christchurch should keep its Casino.*
- *Residents are happy with the Casino and the retailers but not with the other bars; Casino is definitely not one of them; happy with the Casino.*
- *The Casino is not affecting the area; the Casino sets that end of Victoria Street apart - the businesses opposite appeal to their patrons.*
- *Christchurch Casino should be open for the people of Christchurch to give them a place to relax.*
- *On Wednesday, Friday and Saturday nights we get clients from the Casino eating here - our prices are higher than the Casino but I think they like the change of scene and menu here.*
- *We had some problems with the results of anti-social behaviour around our property - discovered this when coming to work in the morning - and the Casino have been positive in dealing with it; their security staff keeping an eye on our place and use of Casino video cameras to observe the vicinity.*

**Appendix K Estimating the Total Unique Individuals visiting the Christchurch Casino - 1 April 2016 to 31 March 2017.**

	Common data		
(A) Carded Players Club (PC) members in 12 months - gaming		23654	
(B) Total number of carded visits in 12 months by carded PC members - gaming		276619	
(C) Average frequency of carded visits in 12 months by carded PC members - gaming (=B/A)		11.69	
(D) Carded PC members in 12 months - not gaming		4513	
(E) Total number of carded visits in 12 months by carded PC members - not gaming		9568	
(F) Average frequency of carded visits in 12 months by carded PC members - not gaming(=E/D)		2.12	
(G) Carded PC members - all who visited in 12 months (=A+D)		28167	
(H) Total number of carded visits to the Casino - all carded PC members (=B+E)		286187	
(I) Average frequency of carded visits to the Casino - all carded PC members (=H/G)		10.16	
(J) Total number of visits - PC members and non-members (Door count by Casino)		706580	
(K) Total number of visits - uncarded patrons (=J-H)		420393	
	Scenari	Scenario 2	Average
(L) Average number of visits by each uncarded patron in 12 months	3.49	5.85	4.67
(M) ALL uncarded patrons in 12 months (=K/L)	120456	71862	90020
(N) Total Unique Individuals visiting the Casino in 12 months (=G+M)	148623	100029	118187
(O) Number of carded NZ residents visiting the Casino in 12 months (=G*96%)	27040	27040	27040
(P) Number of uncarded NZ residents visiting the Casino in 12 months (=M*72%)	86729	51741	64814
(Q) Total Unique NZ residents visiting the Casino in 12 months (=O+P)	113769	78781	91855
(R) Total Unique NZ residents visiting the Casino in 12 months - gambling(=Q*84%)	95566	66176	77158
(S) Total Unique NZ residents visiting the Casino in 12 months - not gambling(=Q*16%)	18203	12605	14697

Scenario 1: Based on survey of Casino patrons carried out for this assessment. Subject to sampling error.

Scenario 2: Based on HR Log statistics (CCL)

Note: The critical variable to be estimated was item L, the average number of visits by uncarded patrons to the Casino in a 12-month period. Thus an estimate of 4.67 visits in 12 months is the average of 3.49 and 5.85

(T) Number NZ residents visiting Casino & gambling without harm - CCL estimate (=R*0.947)	90501	62669	73069
(U) Number NZ residents enjoying entertainment without harm in 12 months (=S+T)	108704	75274	87765
(V) Number NZ residents gambling without harm - adj.NGS estimate (=R*0.923)	88198	61074	71209
(W) Number NZ residents enjoying entertainment without harm in 12 months (=S+V)	106401	73679	85906
(X) Number NZ residents experiencing some harm in 12 months - CCL estimate (=R*0.053)	5065	3507	4089
(Y) Number NZ residents experiencing some harm in 12 months - adj.NGS estimate (=R*0.077)	7359	5096	5941

**Appendix L            Extracts from the NZ Harms Study Report**

The text in this appendix is drawn from Central Queensland University and Auckland University of Technology (2017): *Measuring the Burden of Gambling Harm in New Zealand*, specifically the section (pp. 23-47) entitled 'How harm is manifested'.

**How harm is manifested**

When considering gambling-related harm, much of the focus is directed towards the person who gambles, and is experiencing problems with gambling. Often overlooked is the fact that gambling-related harm generally occurs on a number of different levels: harm to the individual who gambles, harm to family and friends, harms to their whanau, and harms to the general community. The source of harms clearly begins with the individual who is gambling at a problematic level. The harm may be understood to act like a contagion, spreading through social connections. Family and close friends are most immediately affected: these can be broken down into two categories, 1) immediate family; and 2) friends, extended family and whanau. The immediate family refers to those who often experience most immediate and pervasive harms due to their partner, child, parent, or sibling's gambling. The majority of the literature, and subsequently this review, focuses on the harms experienced by partners and children of gamblers. However, it is not unusual for other family members to experience similar harms dependent on the level of involvement with the gambler, particularly the parents of the person who gambles. Other affected persons may be friends; extended family and whanau; colleagues; peers; and those in social, cultural, or political networks. Whilst these groups may experience lower levels of harm than those in the gambler's immediate family, a small proportion may occasionally experience severe impacts (e.g. from criminal activity). On the broadest level are harms occurring to the community. The community can refer to a population bounded by a number of commonalities including geographical, cultural, political, or socio-economic links. The spread and experience of harm across these different groups can vary significantly depending on the relationships or cohesion between them.

## **Harm to the individual**

The nature of harms experienced by an individual can be broadly grouped by effects in the following domains:

- Decrements to health (both morbidity and mortality),
- Emotional or psychological distress,
- Financial harm,
- Reduced performance at work or education,
- Relationship disruption, conflict or breakdown, and
- Criminal activity.

These will be discussed separately in the subsequent sections.

## ***Health***

The majority of harm to an individual's health in relation to gambling is related to significant increases in their levels of stress and anxiety. Physical changes in an individual's biochemistry have been noted in people experiencing problems with gambling that are consistent with exposures to high levels of stress and arousal.

There is a significant body of evidence showing that problem gambling is strongly associated with a number of other co-morbidities. However, association does not imply causation, and causal sequences and interaction are difficult to determine. Strong associations have been identified between gambling and other addictions; mental health; social impairment; and age related health impairments. The escalation of such co-morbidities may be a result of mutual, bi-directional causation between gambling and other co-morbidities (alcoholism and homelessness), given that many share the same risk/protective factors as gambling.

At a national level, evidence has been found for relationships between problem gambling, physical health, and self-reported health. The New Zealand 2012 National Gambling Study noted that reported good health decreased with increasing risk of problem gambling. There was a steady decline with increased gambling risk, with 44% of low-risk gamblers, 36% of moderate-risk gamblers and only 22%

of problem gamblers reporting good or excellent general health, demonstrating a strong association between gambling risk level and harm to an individual's health.

International research has identified some concerning patterns of harm relating to individual health and multiple risk factors. Those who met the criteria for pathological gambling (DSM-IV) had more medical and mental health conditions, had a higher body mass index (BMI), were less likely to participate in regular exercise, and were more likely to be classified obese. They were also more likely to engage in unhealthy lifestyle behaviours such as excessive alcohol consumption, smoking, and watching more than 20 hours of television per week, and were less likely to seek health care (medical and dental) due to financial pressure. These risk factors translated into poorer health outcomes with lower ratings of self-health, more emergency department visits, and increased likelihood of hospitalisation for a psychiatric condition. It is important, however, to be cautious in how these findings are interpreted. The causal sequence between gambling behaviour, behavioural health determinants, and health outcomes is not established by this study and a third variable's influence (for example socio-economic status) cannot be discounted.

In New Zealand, the 2012 National Gambling Study found that those experiencing, or at risk of developing, gambling problems had higher rates of tobacco, alcohol, and substance (drug) use ... also indicate that problem gambling behaviour has substantial links to mental health problems and psychological wellbeing.

The links between problem gambling and mortality are complex and yet to be fully explored across multiple causes of mortality.

It is important to note that both suicide and gambling are part of a much more complex interaction of determinants and morbidities. As argued by some researchers, to say gambling causes suicide may oversimplify the issue, leading to misunderstandings regarding the solution. Like other crisis level harms, suicide has a relatively large impact but with very low prevalence; therefore suicide would be a relatively minor component of the aggregated amount of harm caused by gambling based on only a count of harms.

***Emotional or psychological impact***

Problem gambling can also affect the emotions and psychological distress experienced on a day-to-day level. International research has identified harm in terms of emotional or psychological distress as experiences of guilt, anxiety, and helplessness; as well as shame, stigma, grief, and self-hatred. Indeed, the New Zealand 2012 National Gambling study found that 4% of those who gambled within the last 12 months had experienced feelings of guilt. There has been limited investigation of the relationship between emotional states and gambling severity and there are still significant gaps in our objective understanding of this type of harm.

The two aspects of emotional or psychological distress to receive attention are those of shame and stigma. In the New Zealand 2012 National Gambling Study, 2% of people reported experiencing criticism because of their gambling. Stigma and shame are not just an outcome of gambling behaviour but can also perpetuate other levels of harm, particularly in some New Zealand communities where there are broad social circles and extended family ties. This has been investigated in terms of the issues associated with problem gambling in Asian families where communities identified stigma and face-saving as cultural values and beliefs, suggesting that such states could potentially reduce help-seeking and community connectedness. Instead, individuals may isolate themselves by refusing to attend social events for fear of being stigmatised; exacerbating feelings of shame and the experience of other harmful outcomes (i.e., relationship breakdowns). Not only can shame and stigma affect social and community connectedness, but they can also severely impede help-seeking, early detection, and future treatment.

***Financial***

Financial harm does not simply refer to the crisis level harms such as bankruptcy or loss of a major asset (e.g., house, car, business) that usually precipitates help-seeking behaviour. Financial harms can include escalating harms such as the erosion of savings, juggling or failure to pay bills, borrowing money, or a decline in the standard of living. A function of financial harm is deprivation where individuals go without necessities as a result of increasing or perpetual gambling behaviours. The trajectory of this process - from loss of discretionary consumer items to deprivation to crisis - differs substantially depending on other factors such as socio-economic status, income, lifestyle, and severity

of the gambling problem. This makes it difficult to develop a universally applicable conceptualisation of financial harm.

A large portion of gambling-related harm and losses is often experienced by those living in low-income areas, and who are consequently more likely to be receiving welfare benefits. In considering deprivation, the New Zealand 2012 National Gambling Study assessed whether individuals had gone without quality food or home-heating. People experiencing problems with gambling were found to have higher levels of deprivation, with almost three-quarters reporting they were forced to purchase cheaper food during the past twelve months compared to a quarter of adults generally. Moderate-risk and low-risk gamblers also experienced some of these deprivations more frequently than non-gamblers and non-problem gamblers. In an earlier study conducted by the Salvation Army investigating Foodbank clients, 37% of people accessing Foodbank services were either problem gamblers themselves or were affected by the gambling of others.

The interactions between gambling and financial harm are complex. Some ethnic groups (i.e., those from lower socio-economic backgrounds, or those experiencing comorbidities associated with gambling) are more likely to be vulnerable to financial harm than others. Similarly, financial harm may also be dependent on the mode of gambling behaviour. For instance, a population study showed Pakeha gamblers who wagered on TAB/race track and casino EGMs rated themselves better off financially than Pacific respondents who gambled on EGMs in a bar or casino. Maori EGM users rated themselves as having the worst housing situation compared to Pakeha and Pacific gamblers. In some of these population groups (e.g. Maori and Pacific groups), financial burdens and gambling problems can be exacerbated due to the lending, sharing, and borrowing of money between others in the communities. These interactions can aid in concealing the gambling problem, increasing debt and financial worries while the gambling problem remains untreated.

### ***Reduced work performance***

There are multiple ways in which problem gambling can affect employment or study commitments, and reduced performance in these areas can contribute to both short and long-term impairment to finances and social relationships. Preoccupation with gambling can impair studying or working relationships, result in poorer work performance (e.g., gambling on internet devices at work), absenteeism due to gambling, theft of resources to support gambling activities, and eventually,

termination of employment or enrolment. It is important to note that in addition to paid employment and study, these same impacts can occur in volunteering, which otherwise provides value to the community.

### ***Relationship disruption***

There is a strong connection between problem gambling and the breakdown of family and personal relationships. Research indicates that people experiencing problems with gambling are more likely to be separated or divorced, and also experiencing higher levels of conflict in other personal relationships. Again, it must be emphasised that the direction of causality is uncertain; relationship dysfunction may be a cause or an outcome of gambling, or both may be outcomes of a third factor. The New Zealand 2012 National Gambling Study found that, relative to the general population and recreational gamblers, people experiencing problems with gambling more often reported an increase in the number of arguments with someone close (39% vs. 4% of non-problem gamblers). Compared to non-gamblers, those who were categorised as moderate and low-risk gamblers reported more troubles with work, a boss or superior, and increased arguments with someone close.

Most research that examines harm in terms of relationships tends to be conceptualised at a crisis level, for example, relationship breakdown, that prompts individuals to seek treatment. Less is known about the process of escalation, or lower level harms that fall within the category of conflict and disruption to relationships. Similarly there is a focus on the spouse or partner of the individual who gambles. Whilst this relationship is often harmed most significantly, other relationships such as workplace relationships, friends, parents, siblings, children, extended family, and other social, political, or cultural affiliations can also be affected. Similarly, it is important to distinguish that harm to relationships is not only a harm in itself, but can also contribute to adverse emotional states, poorer health outcomes and even homelessness whilst potentially exacerbating the gambling problem and other co-morbidities.

### ***Criminality***

Problem gambling has also been found to be associated with criminal behaviour for both the general population and those within the prison system, most commonly being associated with property crimes and fraud. People with high gambling participation were significantly more likely to engage in illegal

activities than people with low participation or who did not gamble. From a 2007 general population study, for those who were involved in criminal behaviours, a quarter believed they would not have committed the crime if they had not been gambling in the last 12 months. This finding is consistent with the prior prison studies, which found that few of the inmates started their criminal careers because of gambling but that many subsequently became problem gamblers, with gambling being a reason for the criminal behaviours.

### **Harm to family and significant others**

Gamblers are not the only people who experience gambling-related harm. Consistent with the public health approach to gambling, the connection to other individuals through psychological, emotional, physical, economic, and familial pathways creates a vector for the transmission of the harm.

Generally, there are four discrete groups that have different experiences of harms related to an individual's gambling behaviour; these are:

- the immediate family,
- the extended family,
- friends, and
- whanau.

#### ***The immediate family***

The immediate family generally refers to those directly involved with a person who gambles, such as spouses/partners, children, siblings, and parents.

The most commonly reported impacts included, physical health, mental wellbeing, housing situation, material standard of living, relationships, caregiving for children, feelings about self, overall quality of life, and overall satisfaction with life (Abbott et al., 2014a). People co-habiting (partners and children) often experienced greater levels of harm due to the sharing of finances and responsibilities as well as greater emotional investments within the relationship.

The spouse or partner

One Australian study identified the harms most commonly reported by partners as being financial impacts (increased debt and financial strain), breakdown of relationships due to conflict, loss of trust due to dishonesty and concealment of the gambling problem, and a change in roles within the marriage from working together to becoming the “gatekeeper”. Practical impacts require partners to go without daily household items and quality food, suffer financial burdens such as juggling payments, loss of utilities, and indebtedness whilst experiencing the shame and stigma that occurs when deficits become apparent to others. Partners and spouses additionally experienced poorer health outcomes and development or exacerbation of maladaptive coping mechanisms themselves (such as alcoholism and overeating). A similar complex causality between harms as experienced by gamblers has also been observed in partners, such as inability to afford medication or treatment.

Experiences of isolation and self-blame have been explored internationally within qualitative studies. Isolation occurs through either partner distancing themselves due to feelings of shame, or by others distancing themselves from partners who gamble. Most common reasons for affected others isolating themselves from partners who gamble were the gambler’s actions, usually related to issues of trust in relation to financial matters. Other reasons identified as causing feelings of isolation among affected others related to perceptions of safety in gambling venues due to the temptation to gamble and a loss of sense of self. Self-blame is another identified pervasive harm and refers to the idea that they should have been able to save or prevent the person from gambling.

One area highlighted in both New Zealand and international literature is the link between problem gambling and intimate partner violence.

Cultural differences have not been explored in terms of the experience of harm to partners or whether a collectivist culture acts as a protective factor to partners. When considering harm to partners within a New Zealand context, the collectivist nature of some cultures may mean that partners receive more support (rather than being isolated), than seen in Westernised cultures (e.g. amongst Pakeha, or in Australia and Canada).

The children

Children under the care of people experiencing problems with gambling are often harmed through deprivation of essential items due to financial harms. They may also be exposed to broken homes, damaged relationships, physical and emotional harm (both to themselves and their parents and siblings), and are at higher risk of eventually experiencing problems with gambling themselves. Anecdotal catalogues of harm have suggested multiple forms of harms that could be experienced by children including neglect, staying up late, losing sleep, missing school, being hungry, eating more take away or convenience food, and potential vulnerability to abuse through lack of supervision. Children of problem gamblers are also more likely to experience some level of physical violence or abuse from their parents, particularly if the parent is experiencing other comorbidities such as alcohol abuse. A specific episode of neglect can include children or infants being left unattended in casinos and casino car parks while their parents or carers gamble.

Empirical work has provided the largest contribution to understanding the experiences of children with gambling-related harm. They characterised this impact as a pervasive loss that encompasses both physical and psychosocial aspects of wellbeing. Children in these circumstances were found to be more likely to experience neglect or feelings of loss associated with the person who gambles. Most commonly reported harms were related to feelings of abandonment, altered relationships (both between the parent and child and the wider family), trust, security, sense of home, and insecurity of material needs. Other issues identified were abuse, emotional deprivation, poor role modelling, destructive behaviour problems, inadequate stress management skills, poor interpersonal relations, diminished coping abilities, greater risk of negative health outcomes, and psychosocial disruption due to the chaotic and unpredictable environment within the home. Educational attendance could suffer as result of not getting to school, not being able to afford resources, missing school to look after parents, or an inability to engage with school properly due to distraction/poor nutrition. It is notable that most or all of these impacts are also associated with low socio-economic status. Children can become more socially isolated when they cannot attend normal social events (e.g., parties, movies, sports). The wide range of specific forms of harm enumerated above illustrate a more general point that the specific forms in which harm manifests is often quite unique to each individual and family situation. This presents a significant methodological challenge in measuring harm.

A consistent finding within the literature is that these children are more likely to develop problems with gambling themselves.

***The extended family, friends and whanau***

Just as immediate family members and close friends experience harm related to gambling, similarly, the connection through psychological, emotional, physical, economic, and familial pathways creates a vector for the transmission of the harm further out. Such harms may include increased responsibility for children (e.g. transporting to and from school or babysitting), being asked to lend money, providing support and guidance, being subject to petty theft or stealing to fuel gambling habits and, in extreme cases, offering accommodation or utilities payments when financial or relationship harms reach crisis point. It is theorised that many of these factors can produce their own harms on extended family or friends, putting pressure on their resources, relationships and physical and psychological wellbeing. Such harms will also depend heavily on the strength of the familial, cultural, economic or political affiliations, and what is expected of a person within these systems.

**Harms to the broader community**

Within New Zealand, studies have sought to investigate community level harms from gambling and have theorised two possible pathways through which gambling exposure may impact on community wellbeing:

- harm arising directly through crime and disorder; and
- indirectly through the costs that gambling affected households impose on other households in their neighbourhoods.

***Direct harms***

Problem gambling treatment providers, gambling industry staff, and community groups identified financial harm to the community resulting from theft to support gambling as most prevalent, as well as social security/services and benefit-related crimes. Strain on the community caused by gamblers who expect to be 'bailed-out' by their community, or who abuse positions of power or trust within their communities, was also highlighted by participants in this study as direct harms to the community.

Other direct community related harms that have been given less attention are those relating to health and welfare costs. Inclusive are the direct costs of treating the gambling problem itself (i.e., counselling, treatment or support) but also indirect costs associated with treating gambling-related harms (i.e., psychological and emotional harms, family breakdown, health problems) and harms experienced by affected others. People with gambling problems tended to delay medical care thus having a higher frequency of emergency room visits. Early intervention prevention activities are less expensive than emergency treatment for a health problem, and the delay in treatment increases the cost to the community both directly in terms of additional resources required and indirectly through burdening family, friends, or others with greater workloads or responsibilities (a form of opportunity cost).

### ***Indirect harms***

One of the most pervasive harms to the community is how gambling continues to perpetuate cycles of disadvantage by affecting factors that contribute to poverty, poor health, and lower levels of human and social capital, thus compounding and concentrating harms. Given the disproportionate number of EGMs located within poorer communities and the vulnerability of these groups, this is of particular concern; as evidenced by some populations (such as lower socio-economic and ethnic groups) experiencing greater losses than other populations. It has been suggested that the nature of disadvantage motivates people to gamble as a form of justice seeking, that is, as a means to retrieve what they feel they deserve or to try to catch up with the rest of society. Such ideation reflects a misplaced form of aspiration of contemporary consumer culture.

### **Harms in Maori and other New Zealand communities**

There is strong evidence indicating that certain ethnic groups disproportionately experience harm related to gambling. The most frequently cited reasons for this are the socio-economic and political status of such groups within society (e.g. deprivation, lack of representation); access to gambling venues; cultural beliefs, values, practices and processes of colonisation; and migration and acculturation.

***Maori***

Maori suffer more adverse impacts of gambling and experience more problem gambling than do non-Maori. Considering that gambling was not a norm within traditional Maori culture their introduction to gambling highlights historical European influences on this culture. Culture-related harms have since been associated with the use of Maori cultural symbols and practices in gambling advertising.

A 2006 study on the socio-economic impacts of gambling in New Zealand found that some gambling effects were unique to Maori; these included destruction of Maori family values and care-giving practices, damage to mana (prestige, status, spiritual power), and emotional harms in terms of a person's wairua (spirit/soul) and identity. Likewise, other qualitative research with Maori whanau and communities has suggested impacts such as the erosion of social and cultural capital and Maori cultural and family values, and the neglect of children and erosion of family relationships caused by reduced time and money available to families.

Impacts on whanau included child neglect, whakama (shame), loss of respect for and of a trustful relationship with the gambler, negative consequences of resultant debt, and emotional distress and depression.

In a 2009 study, the authors reported that gambling and gambling addiction, can encourage an individualised view of the world, which erodes or changes traditional concepts such as whanau, whanaunagatanga (relationship, kinship, sense of family connection and belonging) and koha (gifts and contributions to others that maintain social relationships and have connotations of reciprocity).

***Pacific people***

The five largest Pacific ethnic groups are Samoan, Cook Islander, Tongan, Niuean, and Fijian people. Although a large proportion of Pacific people do not gamble (as reflected in the lower participation rate compared with the national average), those who do gamble are at greater risk of developing problem gambling. It has also been shown that whilst fewer Pacific people take part in gambling activities than the general population, a disproportionate number of those who do gamble have a higher expenditure than other population groups.

In 2013, the Gambling and Addictions Research Centre completed research into the impacts of gambling on Pacific families and communities in New Zealand. Almost three-quarters of respondents who gambled reported losing money on gambling, although only 15% reported negative financial impacts due to their own gambling (and 13% reported winning money overall, on gambling). Approximately one-fifth (21%) of respondents reported negative financial impacts from someone else's gambling, along with negative feelings about self (20%) and negative impacts on life satisfaction (18%). Similarly in another data set, 37% identified being 'unable to pay for household bills/food/rent' as the top impact of harmful gambling and 32% identified 'financial problems'.

Another qualitative exploration of impacts of gambling in Samoan families and communities identified breakdown in family relationships (e.g. honesty, trust, time spent together) as a key impact as well as difficulty providing for children's needs; extra financial and care-giving burden pushed on to extended family; budgeting and financial problems (leading to selling of possessions and eviction); reduced contribution to the community; as well as negative impacts on health, employment and education.

### ***Asian people***

In New Zealand, it is hypothesised that the acculturation process, lack of experience in New Zealand commercial gambling environments, significant spare cash and free time, limited English ability, difficulty gaining employment, and disconnection from family, all create a negative cycle whereby stress leads to gambling to try to win money and/or escape pressures. The lack of a cultural tradition of seeking support outside the family ('face-saving' avoidance of shame) is highlighted as both a significant barrier to help-seeking and a harmful impact of gambling where it contributes to disconnection and alienation from one's community among Asian gamblers.

Key consequences of problem gambling for Asian individuals were summarised as loss of social connection and isolation; loss of financial security; engagement in illicit activities (theft and prostitution) to support gambling; mental health issues; and family conflict. Key impacts on Asian families and communities were loss of opportunities (becoming less able to achieve the kind of life for their families they envisaged with emigration); physical health issues (stress causes illness among family members); material and monetary loss within the community; loss of trust and community cohesiveness (problem gambling dividing communities) and; eroded social support mechanisms.

### **Social influences on the experience of harm**

Empirical research of gambling harms, including prevalence studies and qualitative investigations, suggest that there is a high degree of individual and environmental variability in the vulnerability to, and experience of, gambling harm. Factors such as the gambling space, exposure to gambling from an early age, past trauma, and individual beliefs relating to gambling can all influence the severity and susceptibility to experiences of harm. Despite many links being identified within the literature, the exact causal/moderating relationships between such factors and the quality or quantity of experienced harm are yet to be fully established.

One of the most commonly studied aspects of gambling harm in the literature is that of co-morbidity with other forms of harmful experience, such as mental illness or substance abuse. However, the nature of the casual effects are difficult to confirm. It is recognised that there are multiple complex interactions between gambling and other individual factors, regardless of gambling severity, that can either perpetuate each other, or generate or exacerbate the experience of other harms.

It has been suggested that gambling problems can often be, at least partially, used as an adaptive coping mechanism in order to deal with or escape from a pre-existing stress or trauma. These can be biological or psychological traumas such as brain injury or mental illnesses like post-traumatic stress disorder or social traumas such as divorce, hardships, or other problems. Older New Zealanders may gamble more often due to a desire for companionship in a safe public space – a potentially influential coping mechanism for loneliness when the spouse is deceased.

Environmental and contextual factors can play a role in affecting the intensity and quality of gambling behaviour, potentially leading to increased risk of harm. In the past, most research considering gambling environments related to the immediate physical space in which gambling occurs. However, when considering the experiences of harm, it is now recognised that a community level approach is needed to understand the full scope of environmental influences; the most notable of which is the normalisation of gambling within a society or sub-population.

Normalisation can occur through exposure through advertising, the family home, and through local community events or activities. Children can be exposed to gambling from other avenues such as through their parents gambling behaviours; family, or community events that involve games of chance

(such as raffles, or other games which require a “gamble” or unknown outcome); and, even through education in finances, budgeting, and spending. In the New Zealand social context, attention should be paid to the degree to which children are exposed to gambling. A commonly reported form of exposure includes Maori and Pacific children participating in raising money for local causes (i.e., churches) through playing housie (bingo) with their families.

As well as considering social, community, and family factors that can influence the potential for harm, one should also consider internal characteristics of the individual that may affect gambling behaviour and subsequent harms. Those who have issues with self-regulation or control are more vulnerable to developing a gambling problem and, as such, are more susceptible to experiences of harm.

Dissociation refers to an unthinking state associated with conscious or unconscious attempts to escape from reality; often resulting in losing track of time, blacking out, not recalling where you are or what you have done, or feeling as though you are someone else. In terms of gambling, dissociation is often in the form of losing track of time spent gambling and being unaware of expenditure or games played. This most commonly occurs when playing games that require limited cognitive loads and when games are played at an increased pace such as EGMs.

Finally, those who hold superstitions, faulty or erroneous cognitions, or misconceptions relating to gambling are often more likely to be vulnerable to harm. Most commonly these occur due to a lack of understanding surrounding how the game works and the odds of winning. Unlike other products where repeated consumption tends to result in greater familiarity and understanding, the frequency of which play is conducted does not lessen the extent to which these beliefs are maintained. Instead, with repeated use these beliefs often become more entrenched, ultimately perpetuating the gambling behaviour. An example of a common misconception is the “gamblers fallacy”. According to this belief, a sequence of recent losses is considered to increase the probability of future wins despite the outcome of most gambling games being unrelated to previous outcomes and, therefore, neither wins nor losses alter the probability of future success. Such distortions encourage disordered gambling and occur at all levels of gambling problems. It appears likely that sub-cultural customs and beliefs may contribute to the development and maintenance of erroneous cognitions about gambling. However, this is a topic that is still largely unexplored.

Taylor Baines & Butcher Partners

Appendix M Casino Reportable Incidents - time series

<i>Incident category</i>	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	
<i>Breach of exclusion</i>				3	25	37	46	25	38	39	25	45	35	35	36	77	44
<i>Breach of self-bar</i>	85	89	107	42	25	37	46	25	38	39	25	45	35	35	36	77	44
<i>Breach of casino exclusion</i>	0	0	0	29	95	76	74	64	85	84	54	113	73	77	97	152	111
<i>Breach of trespass</i>	34	41	46	57	34	27	34	40	42	35	20	45	42	55	61	63	52
<b>ALLEGED OFFENCES</b>																	
<i>Assault in gaming area</i>	1	1	0	0	0	0	1	0	1	3	0	0	1	1	1	3	0
<i>Assault not in gaming area</i>	1	2	5	1	0	4	6	2	1	1	3	9	5	33	18	4	0
<i>Begging</i>	4	4	1	2	4	2	0	5	0	1	0	3	2	5	5	3	0
<i>Cheating</i>	0	0	7	3	1	4	2	6	4	4	0	2	0	1	2	1	0
<i>Cheating equipment</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Counterfeit chips</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Counterfeit notes</i>	0	0	0	1	0	1	0	0	0	0	0	0	0	1	0	1	0
<i>Drug offences</i>	0	0	0	0	2	2	2	1	3	2	1	1	0	11	5	1	2
<i>Money laundering</i>	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0
<i>Loan sharking</i>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Theft in gaming area</i>	14	34	16	29	31	37	30	31	30	32	14	22	20	23	17	11	21
<i>Theft not in gaming area</i>	4	11	6	7	8	6	5	10	8	3	9	9	10	19	11	3	5

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<b>Incident category</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Children found abandoned</b>	0	0	0	1	0	1	3	0	0	0	0	1	2	2	0	0	1
<b>Underage not participating in gaming</b>	5	15	12	6	16	12	21	16	12	15	2	7	2	6	5	2	2
<b>Underage participating in gaming</b>	3	25	20	7	9	10	5	6	7	4	1	0	0	3	5	1	0
<b>Underage refused prize payment</b>	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Police incident</b>	0	4	1	3	7	1	7	4	6	10	17	27	9	17	19	10	8

**Appendix N          Anonymised comments - responses to the No Casino option**

Section 6.4 assesses the likely social effects in certain key areas - gambling participation, harm from gambling, employment and neighbourhood amenity - if the Casino were to close because its licence is not renewed.

The surveys conducted for this assessment with Charitable Trust recipients, supply-chain companies and corporate sponsorship recipients asked respondents to “describe the likely consequences for your organisation if Christchurch Casino ceased to operate in 2019 (i.e. at the end of its current licence period).”

The anonymised comments are listed below.

***Responses from Charitable Trust recipients***

- *in terms of funding from them it wouldn't have a great impact only because of the level of funding.*
- *downscaling of what we would have to offer*
- *we would then have to find that funding from another source and it is getting harder and harder to find those sources*
- *no grant is guaranteed and we could continue to operate but would feel loss*
- *in terms of*
- *f money we can help less people.*
- *it would hamper our ability to respond to people to the depth and extent that we currently do in a timely way*
- *it would have no effect because the grants have lapsed in the last few years (mix up and haven't put in applications) but that's not to say that the grants have not been appreciated or their value underestimated. If we were still receiving the grants and the casino closed the service could continue we just wouldn't be able to cater for as many .....*
- *wouldn't be devastating for us due to the scale of what we have to raise but what it gives us as a whole would mean it would have a significant impact – there would be lost opportunities due to the loss of relationship*

- wouldn't have a dramatic impact but would impact as it is support we regularly get and we factor into our budget every year. We have enhanced that relationship over the years and it is something of value to us
- in terms of the effect on our organisation - we wouldn't have the resources to do our ..... work on the same scale, we would have to reduce it.
- if we didn't have the additional funding we would struggle to meet demand, we would have to manage without which would be quite a struggle
- we rely on small donations to provide our services
- funding is an issue for us so it would impact on us as we would have to look elsewhere and build up a new relationship
- not relevant as our organisation has closed but it would have a large impact on many organisations
- we would have to source funding elsewhere – it would be more work although it has always been like this and we are used to doing it
- we would find a way of operating but it wouldn't be easy
- have to find funding from elsewhere
- it would be tragic for us
- it would impact on our funding so we would have to put time into looking elsewhere for donations, it is a small impact but because it is a donation for operations it is valuable.
- In terms of the effect on the community, people would have less access to gambling.
- in terms of the Casino closing – ..... – should have a healthier community if it shuts but it's likely that problem gamblers will go elsewhere – the cause and effect is uncertain.
- ..... It may be that they transfer ..... to other forms of gambling so I'm not sure how they would be affected.

**Responses from supply-chain companies**

- Would be a real shame as I think it is a huge asset to Christchurch, especially once the Convention Centre opens, as it is a great entertainment venue and is the smartest casino in New Zealand.
- regrettable loss of a valued client.
- hurt us badly, especially in the winter months.
- it would mean losing a lot of work - and losing a relationship with maintenance staff at the casino.
- could knock on to a job loss if we could not replace the business,

- we have a good relationship with the casino and the IT team and they have "a good annual spend with us". Over the 10 years we have a mutual trust and respect for the work that the IT team does.
- would be a nightmare at the start - it would take time to replace their business, but I would not lay off staff. Our ..... company would suffer as well. It would have an ongoing effect.
- on a personal level it would be a tragedy for the city - it is iconic for the city.
- it would cost jobs.
- you build up relationships which takes time to get to know people; these relationships are good to have.
- it would adversely affect my business and other businesses in the vicinity of the Casino (hospitality sector) that we also work for - a flow-on affect to us beyond just the loss of the casino business.
- like all small operating businesses every little bit is needed and we have staff to look after.
- a significant reduction in added value revenue I get - they will spend extra to do things right; they are aware of neighbours.
- they are one of the key regional accounts so we would take a hit and it's not easy to replace sales like theirs, so we would probably have to lay off several people.
- this would be a significant loss to the Christchurch CBD service area - we are using 2 staff to service this account.
- very unfortunate for our business; they pay on time and are very good professional customers; they are up front in their dealings with us.

**Responses from corporate sponsorship recipients**

- Would survive, but would have a critically negative impact on us and all those involved - would hate to think that the casino will close.
- There's a lot we could not provide without the Casino's substantial contribution (e.g. transport for all ..... The casino has been critical to our survival in the past 5 years since the quakes - the last building standing - they have been a very loyal sponsor. And the facility itself is of massive value to us.
- People favour donating to capital schemes (art gallery, theatre, stadium, etc.) and this puts pressure on us who have to rely on fundraising for our actual operations. If the Casino closed, the loss of its sponsorship would mean a reduced programme of activities - ..... It would be difficult to find a replacement sponsor in the same pool of donors.

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- *Would have a significant impact on our sponsorship revenue - as a registered charity, we run ourselves close to the bone - we need to break even each year. A huge number of organisations would suffer if the casino disappeared.*
- *It is very hard to attract sponsorship for .....; sponsorship from the Casino is vital. We would have to cut our programme and support across the community and ....., and this would have disastrous effects on the community as a whole. .... Health benefits from sport participation would be affected - a healthy, fit community is a resilient community.*
- *It would have a big effect; we would have to cut back on our activities in schools and then this would spin off on ..... as well. Their support allows us to do the coaching in the community.*
- *The Casino supports so many events like this - and events need sponsorship; the Casino puts so much into the community - it is a lifeline to events - would be sad to see it go.*
- *Financially we would be fine. Nevertheless, sponsorship for ..... is not easy to get; those that do sponsor us have an involvement with us - we have a long history with the Casino - we feel part of the Casino "family". We would lose a longstanding business friend.*
- *We would have to look elsewhere to entertain our customers; we have a symbiotic relationship with the Casino - we endorse the Casino as the official place for entertaining our guests. It would be a significant loss.*
- *We'd lose exposure for the event, and this is a loss of exposure for all ..... - a domino effect.*
- *Closure would not affect us - total sponsorship is only 9% of all our revenue so even the loss of all our sponsorship wouldn't close us down - but we enjoy what we do with the Casino.*