

**Peer Review of Christchurch Casino Casino Impact Report**

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## Introduction

At the invitation of the Gambling Commission, I have been asked to review critically and comment on the Casino Impact Report (CIR) for Christchurch Casino prepared by James Baines and Geoff Butcher (of Taylor Baines & Butcher Partners). The CIR forms part of the application to renew the Christchurch Casino venue licence. Section 134 of the Gambling Act 2003(the Act) specifies that a “casino impact report must be prepared by a person approved by the Commission as independent of the applicant” and must report on the expected social and economic effects, on the local and regional areas affected by the operation of the casino, and on New Zealand generally, of both the continuation of the casino operation and its closure. Messrs Baines and Butcher were approved by the Commission to be authors of the CIR.

I am currently a professor of psychology at the University of Adelaide, where I lecture in advanced statistics, learning theory and in the area of addiction studies. I have degrees in Economics and Arts as well as a PhD in Psychology relating to the psychology of gambling behaviour. I have been involved in gambling research since the mid-1990s and have published around 300 papers and reports in several areas of social policy research, including gambling, child protection and other behavioural addictions. I have also been chief investigator on over 50 funded projects, mostly for government agencies, and have served as an advisor for the Federal Productivity Commission, New Zealand Gambling Commission, and several State governments. I also frequently conduct peer reviews for international funding bodies in Canada, the UK, Sweden and Hong Kong. Much of my recent government work has involved collaborations with the South Australian Centre for Economic Studies based at the University of Adelaide. I have advised the Commission previously on a range of matters, including advice on the nature of gambling opportunities, on table game speeds and in reviewing and commenting on several draft Host Responsibility Programmes.

In reviewing the CIR, I have familiarised myself with the relevant provisions of the Act and the current Host Responsibility Programme in place at Christchurch Casino. I have been asked to comment on the extent to which: (a) the CIR provides a comprehensive appraisal of the social and economic impacts of the continued operation or closure of the Christchurch Casino. My report starts with some general comments concerning the overall content of the CIR and then focuses specifically on the areas of content and methodology which, in my view, require critical comment.

## Overview of the CIR

### Structure and Methodological Approach

1. With respect to content, the CIR is organised into several main sections: (a) The institutional environment surrounding the operation of the Casino, e.g., the relevant government agencies, other gambling services; (b) History, nature and operational structure of the Casino; (c) Economic impact: This includes analysis of the employment created by the Casino; business linkages; overall impact on the local and regional economy; (d) Social impacts: this section is quite long and examines the Casino's role in urban renewal; its donations and support of community and charitable organisations; connections with the community; entertainment value and amenities; positive and negative effects such as its impact on problem gambling or potentially problematic behaviour in the community (e.g., alcohol related violence or financial crime).
2. The CIR derives its conclusions from a number of data sources and appears to have adopted a mixed methodological approach. A mixed methodology approach involves a combination of qualitative (e.g., focus groups) and quantitative data sources (e.g., survey data). A mixed approach of this nature has several important strengths. Quantitative analysis generally involves data collected from a larger number of people and can provide insights into the statistical relationship between variables (e.g., whether two things are related) or 'how many' or what proportion of people have a certain quality or provide a certain response. It can, in effect, show what issues are relatively more or less important within a particular population. On the other hand, qualitative work can be useful in providing more specific examples or illustrations, or indicate how people describe their experiences. Such work can, for example, describe how certain organisations or individuals have been affected by the Casino's operations and may facilitate the interpretation of broader numerical trends observed in the quantitative data.
3. The CIR uses both primary as well as secondary data sources. The term primary data refers to information that has been obtained through a research process instigated by the researchers themselves. Such work is more costly and time-consuming to conduct, but usually has the advantage of being designed to address the research questions being posed. For example, researchers can ask specific questions relevant to the topic and target the most valid population group. By contrast, secondary data refers to data that are made available by

others, but which are seen as being informative for the research question. Such information is sometimes referred to 'archival' or 'historical', but can also encapsulate data generated from other ongoing data-collection processes undertaken for other purposes. Examples might include population surveys, data already collected by the Casino, or broader statistical information collected in the community.

4. Secondary data can be useful because they create time and cost efficiencies. The information is already available, it may be large in scale (e.g., there may be large population surveys available) and it may also be highly relevant. However, secondary data information also has disadvantages. It may not contain sufficient data relevant to the topic (e.g., few problem gamblers in national population surveys are likely to be from any one geographical area; it may not address certain topics; or the questions might not be framed in the right way to obtain the required insights (e.g., some surveys may fail to differentiate the type of activity undertaken under the heading of 'casino gambling').
5. In this CIR, the consultants report several forms of primary data collection. These include quantitative (and primary) data sources such as dedicated surveys of 40 businesses; a survey of visitors to the Casino; and a survey of existing Casino staff about their experiences working at the casino. The research also uses secondary sources of quantitative data, including: the National Gambling Survey (NGS); Casino card user data; and broader demographic and community data. A number of primary sources of qualitative data are utilised as well, including: information from businesses; casino management; community groups; and, the beneficiaries of Casino donations/ support.

#### Strengths and Principal Insights from the CIR

6. In my opinion, the CIR covers a range of highly relevant areas; it has examined both the social and economic impact of the Casino; and it has engaged with different stakeholders (the industry, local business and community groups). It also provides some primary data from surveys and interviews with good representation from the local business community connected to the Casino as well as data from Casino employees.
7. From a structural perspective, the CIR clearly orientates itself towards the task at hand: the Commission's need for evidence under the Act is clearly identified; the scope of the required

evidence and the approaches are set out clearly; and the CIR provides supplementary material relevant to the research (e.g., copies of surveys).

8. From a conceptual and methodological perspective, it uses economic methods that are generally considered appropriate for the analysis of this type of research problem. It also uses a combination of data sources (a mixed method approach that combines qualitative and quantitative methods) and there is some evidence of triangulation of material to build up an overall view of the Casino operation and its effects on the economy and community.
9. In relation to the economic impact of the Casino, the consultants conclude that the Casino is a major player in the Christchurch gambling market; it accounts for one quarter of gambling revenue); hires around 500 people; provides a tourist drawcard that can be advertised; and may be contributing to the post-Earthquake renewal of the city by strengthening the local business/ hospitality/ entertainment precinct. The CIR notes that a closure of the Casino would probably lead to a transfer of a significant segment of gambling to other remaining gambling venues and the authors anticipate that most staff would be reasonably well positioned to obtain employment elsewhere.
10. In relation to the social impacts of the Casino, the consultants provide evidence in support of positive social impacts. Such positive impacts include contributions to the development of local amenities, upgrades to street-scapes, the development of a business precinct, as well as training for staff in the provision of responsible gambling services. They also draw attention to charitable trust donations, corporate sponsorships for cultural and sporting organisations.
11. Perceived negative social impacts include the harms associated with problem gambling. The consultants report that there are likely to be people with gambling problems who visit the Casino, but that their estimates of the likely prevalence of higher risk (moderate risk and problem gamblers) visiting the Casino is lower than estimates using data obtained by the National Gambling Prevalence Survey (NPS) conducted in 2012. They argue that a greater proportion of the 'at risk' gamblers visiting the Casino fall into the low-risk category; this is attributed to the nature of Casino environment as well as the demographic profile of patrons. In particular, the consultants argue that that the Casino appears to have improved its ability to identify gamblers at greater risk visiting the premises as a result of enhancements to their responsible gambling policies and practices. They view the Casino as

being able to monitor and supervise its patrons better than those visiting other types of venues. They further argue that the venue attracts a relatively smaller proportion of people from Maori and Pasifika heritage whose communities are known to experience a disproportionately higher prevalence of problem gambling than other groups.

### Limitations of the CIR

12. When appraising a report of this nature, I am conscious of the fact that the CIR probably had to be prepared in a timely and efficient way. The authors would have been expected to take advantage, wherever possible, of existing data sources. Nevertheless, there are areas of the CIR which could have been informed by more in-depth evidence. Although these deficiencies have not significantly undermined the intended purpose of the CIR as a whole, there are some sections which need to be treated with caution because of concerns about either the conceptual logic or methodological approach adopted. Some broad observations about these limitations are provided in this summary section, with more specific itemised comments relating to particular sections or pages of the report contained in the sections which follow.

#### *Lack of Methodological Detail*

13. It is clear that the authors made a conscious (and understandable) decision to position a lot of the methodological detail in the Appendices of the CIR to avoid making the report too long and unwieldy. However, in my view, the methodological detail concerning sampling method was not sufficiently elaborated in the Appendices (or elsewhere in the CIR). As a result, it is often not clear how reliable or valid the data from several research studies are likely to be. For example, in those sections of the CIR that make use of the (NGS) data, it was not made clear that sufficient cases were available (or had been selected) from this national data-set to allow valid conclusions to be drawn about the Christchurch region.

#### *Lack of Analytical Detail in Qualitative Analyses*

14. In my view, insufficient detail was provided concerning the qualitative data as well. It was not always clear how the data/ transcripts were converted into themes and then analysed. Rather, the CIR contains several sections where lists of quotes are presented without a clear analytical framework or sense of what views represent 'majority opinions'. Such mixed

methods approaches can work well when qualitative data is presented in conjunction with quantitative data (e.g., a few quotes can be used to illustrate a conclusion that arises from analysis of quantitative data). However, when a few quotes are just listed in isolation, the indicative findings may be open to serious question (e.g., was a decision made to select views which were supportive of the renewal of the licence?).

15. There are several reasons for using a systematic analytical approach to qualitative data.
  - a. First, readers may wish to know if the conclusions reached based upon the data are 'emergent' from the data itself as opposed to ones imposed by the consultants. For example, if one uses a systematic approach to qualitative analysis, all the data will typically be organised into a hierarchy or classification of themes. These will usually be identified by one analyst and then cross-validated by another person to confirm that the theme is a meaningful and that various statements do indeed fit under that theme. It is potentially problematic if one merely creates a narrative and then selects out themes which illustrate a point. This leaves open the possibility that there may be other views or themes which have not been captured.
  - b. Secondly, readers might wish to know what views represent the majority opinion of the respondents as opposed to a minority. For example, one does not know, based on the view of a positive quote from one business, whether that particular 'benefit' was also cited by the majority of other similar respondents.
  - c. Thirdly, an advantage of a more systematic presentation of qualitative findings is that it reassures the reader that the potential diversity of views (good and bad) have been captured.
  
16. None of this necessarily implies that the consultants' reporting is any way misleading; indeed, they may have captured the views of many different respondents. However, for researchers familiar with these analytical techniques, the results become more convincing when they can see a clear set of logical steps that outlines the method of analysis.

#### *Limitations in Primary data*

17. A limitation of the research presented is that it does not contain much quantitative data relating to the casino itself and problem gambling. As I will discuss in more detail below, the conclusions on harm relating to Casino gamblers / patrons would have been strengthened if

there had been a patron survey that included the Problem Gambling Severity Index (PGSI). The PGSI is a 9-item standardised scale that is widely used around the world to classify the level of gambling risk and it was used in the 2012 NGS in New Zealand. Scores range from 0-27 with 0 = No risk, 1-2 = Low risk, 3-7 = Moderate risk and 8+ = Problem gambling. Using a scale of this nature would have allowed the consultants to determine the typical level of risk for gamblers who visit the casino by frequency of participation.

18. Similarly, it would have been useful to strengthen the evidence relating to community attitudes to the Casino by conducting a formal survey of residents in the local area, in the wider region and even nationally. A sample of 300-400 residents would have been sufficient to get a sense of their support for the Casino. This survey could have used some of the standardised questions used in the NGS and Australian surveys (e.g., Victorian Community Attitudes surveys). The survey could have asked about various benefits / costs associated with the casino. The sample could have been obtained via a commercial research company with access to panels in certain areas or conducted via phone.

*Clarity in Reporting:*

19. As I will indicate in some detail below, there were a number of sections of the report which are not always easy to follow.
  - a. First, in some parts of the report, additional information could have been included concerning the statistical evidence presented or the steps taken to develop the tables. For example, when using data from the National Gambling Survey to draw inferences about gambling specifically in the Christchurch region, it would be useful to remind the reader about the numbers of cases involved so that the reader could feel more confident about the reliability of the findings. When large overall numbers at a national level are broken down by area, one may be faced with much smaller numbers and therefore estimates which are less reliable or where the 'margin of error' is greater.
  - b. Second, there are several occasions, when the report jumps between different data sources in the same section, e.g., the NGS data, the survey of patrons at the Casino, help-seeking and other aggregate data. Although each of these sources may have

value in their own right, they come from different populations and data collection methods. Comparisons between such data sources must be undertaken with caution and perhaps should have been more separated in the report. For example, in some sections of the report, there are analyses of people's preferred forms of gambling. Discussion of the NGS results should have been kept separate from help-seekers because the general population and those who seek help are quite different. The 'preferred mode of gambling' for the general population is really about broader trends, whereas the same variable in a treatment population probably tells us more about the types of gambling likely to be problematic for this group.

- c. Third, there a number of occasions, where the basis of the calculations could have been made clearer. Percentages are presented in tables without any numbers to indicate what denominator or sample group was used as the basis for the calculations.

#### *Overall Appraisal*

20. Overall, the report has both strengths and limitations.
21. In my view, the report provides a comprehensive coverage of the social and economic impacts of the Casino's operations as required under the Act. The evidence concerning the employment, tourism and amenity value of the Casino appeared both valid and informative and informed by appropriate methodological approaches. I also felt that the economic modelling was appropriate, notwithstanding some questions about the amount of information presented concerning the assumptions used to undertake this analysis.
22. The only substantial concern I had concerning the CIR was the validity of its conclusions concerning the impact of the Casino on problem gambling. Although the CIR attempted to make use of available data sources, I did not feel that this part of the assessment was informed by data that was entirely fit for purpose. For this reason, I would argue that conclusions around the Casino's impact on problem gambling and gambling-related harm needs to be treated with some caution.

#### Specific Comments on the Analysis of Economic Impacts (Chapter 4)

23. Analysis of the economic impacts of the Casino is contained in Chapter 4. The principal focus of this section is upon describing how the Casino benefits the Canterbury area and makes contributions to the wider region. This section is based heavily on secondary data, much of it drawn from the Casino itself (employment and patron data) as well as information previously compiled by the consultants to conduct their economic models. The consultants also have information from their dedicated survey of patrons that asked about reasons for visiting the Casino, their origin and expenditure patterns.
24. A principal component of the analysis utilises a technique called General Equilibrium Modelling. In layperson's terms, these models are methods used to work out the net effect of operating, or not operating, the Casino in the region. If the Casino did not exist, then people would be potentially employed elsewhere and consumers (local or from outside the region) would potentially spend their money elsewhere.
25. The models (based on previous research) are meant to determine how much economic value (jobs, spending) is generated by people spending money at the Casino as opposed to in other areas, e.g., at other gambling venues or in other goods and services. The extent to which an activity generates benefits is usually influenced by linkages (does it source inputs or other services from the local area? Does it give rise to mutual benefits (e.g., attract people to the area who might frequent other businesses?). The scale of benefits is often calculated by 'multipliers' which are numerical weights associated with impacts (e.g., consumer spending, employment) which capture the additional economic effects of the Casino's operation.
26. On the whole, the information contained in this section is clear. The consultants provide evidence concerning the employment opportunities afforded by the Casino to the local area and broader region and the likely net economic impact. They also provide details on the origin of patrons and how patrons might modify their expenditure if the Casino did not exist.
27. There are, however, a few areas in this chapter which could have been made clearer or which need to be treated with caution.

28. For example, the consultants present Table 4.2, which describes the 'Activities at the Casino by the origin of patrons', but they do little to explain the content apart from indicating that 21% of people do not come for gaming. It is not clear what the %s of respondents actually means, e.g., is this the % of people who engage in only that activity and why does this add up to 151%? What is the difference between the % of responses and the % of respondents? In Table 4.3, one is faced with a breakdown of what patrons might do as 'Alternatives to restaurant bars and just looking' and also 'Alternatives to gaming', but this division and how it was obtained from the survey is not provided. One is only referred to the Survey questions in Appendix G by a footnote. Some additional contextual information concerning the questions asked and how this division was obtained would have made the report easier to comprehend.
29. I did not feel that the conclusions on p. 39 were entirely convincing. On this page, the consultants state in reference to patrons: 'They were going to the casino because it provided a better venue....', but it is not clear on what basis that the Casino was considered 'a better venue'. One can certainly make some inferences about what other activities might have been considered based on Table 4.3, but this table says nothing about the quality of the alternatives. As a result it is unclear whether the statement above is the opinion of the consultants or based on evidence from the majority of respondents.
30. Similarly, on page 40, the premises did not appear to support the conclusion (concerning the number of visitors to the city who came to Christchurch because of the Casino). We know that people come to Christchurch to visit the city. We know that people who come to the city also go to the Casino. However, the survey does not ask a specific question about whether people come to Christchurch specifically because of the Casino. In fact, visiting the casino may be incidental to other reasons for visiting the city and the region.

#### Specific Comments on Chapter 5: The Social Environment

31. This long section of the report is titled 'The Social Environment' and covers a range of topics, but not all of these are necessarily specific to the social impact of the Casino in that there are analyses of the employment impacts (Section 5.3), Business links (Section 5.6) and expenditure patterns (Section 5.5.3) all of which could have potentially been considered under the title of economic impacts.

32. The chapter commences with a discussion of the Casino's place in the urban neighbourhood and then proceeds through a series of sections on employee history and origin; community attitudes to the Casino and gambling in general; the views of community organisations including charities; comments from businesses; demographics and visitation patterns of patrons; trends in gambling expenditure; and then a mixture of topics that relate to broader business and community impacts. A range of data sources are utilised. The principal source of primary data are qualitative interviews conducted with businesses and community organisations. Secondary data is drawn from the NGS, the patron survey, data from helpline services and national expenditure data.
33. The positive feature of this chapter is that it canvasses a range of topic areas relevant to social and economic impact. It further draws upon a range of respondents and attempts to consolidate both qualitative and quantitative information in a meaningful way. I generally found the description of the amenities and community impact in the early part of the chapter (Sections 5.2) and the section on business engagement (Section 5.5.3) towards the end of the chapter to be clear and relatively easy to follow.
34. This chapter does, however, have a number of limitations which make the chapter difficult to follow. Apart from the lack of a clear introductory section to map out of the content, I found that much of the material in Section 5.3 and 5.4 jumps from topic to topic often without very much lead-in or justification. Many different data sources (collected for different purposes) are included in the same sections often without a clear structure or argument. This lack of integration of information as well as the limited information about the differences between the data sources makes the arguments in some sections less compelling. I also did not feel that some of the statistical reporting or the meaning of results was entirely clear.
35. For example, the evidence would have been stronger and clearer if the authors had reminded the readers about the numbers of respondents described in Sections 5.4.2- 5.4.5 (e.g., Charitable trusts) and provided greater specificity in the evidence. What does 'overall' (p. 60) mean or 'Several of the corporate sponsor recipients', (p. 61) 'Several businesses' (p. 62), 'For one person' (p. 62). The evidence gives the impression of being very anecdotal and a bit fragmented, e.g., 'Half the recipients acknowledged positively the professionalism of Casino management and staff' . Why is this point singled out for an exact prevalence figure, whereas others are not? Readers are also not provided with a reminder as to what questions

are asked and are provided with only 'Specific anonymised comments' in Appendix J which leads open the possibility that not all views could have been captured in the final write-up. This weakens the reliance which can be placed on this evidence.

36. I was also surprised to see so little analysis of the different products offered by the Casino in this chapter. There is some quite compelling data on the effects of the Earthquake enforced closure of the Casino on EGM expenditure at other venues in the CIR, but not much is really said about table games (apart from the fact that the closure of the Casino could contribute to the re-emergence of illegal card games). Such information would be useful because it may be that table games have some role in attracting international people or 'high rollers' or those from other parts of New Zealand. The significance of this issue is that any activity which has the potential to attract high value customers to the region would have implications for the potential economic value of the Casino on the region. It may well be that such higher value players tend to favour the Auckland Casino and this issue is less relevant to Christchurch Casino's business model, but the particular role of table games and their importance to the Casino may have been usefully included to help inform the Licence Renewal process. Moreover, when considering the social impacts of the Casino's activity, it would be useful to know if there is a difference between table games and EGMs. As the authors show from the NGS, it appears that people will go elsewhere to play EGMs if the Casino were to close, but the loss of table games would have a different impact (would total gambling fall, or might people chose to play online?).
37. Another example of where I questioned the lack of product differentiation was on page 60 where Table 5.5 sets out people's views on socially undesirable gambling activities. Non-casino gaming machines are rated the highest (i.e., worst), but there is only reference to 'casinos'. A casino has both gaming machines and table games. Without any comment on the limitations of these categories, the reader might come away thinking: 'EGMs outside casinos= bad', casinos = not so bad, but what if the questions had referred to gaming machines in casinos?
38. Following on from this point, it is clear that the authors wanted to mount a case that the probability of problem gambling was highest for gaming machines (when this is specified as people's preferred activity), but when people are only asked about 'casino gambling', the

word gaming machines is not mentioned, even though a casino offers this type of gambling. In other words, it is not clear that the data from the NGS is sufficiently refined to differentiate between the different types of gambling which the Casino offers. The Casino offers table games (which may or may not be less associated with problem gambling than other forms of gambling), but they clearly offer gaming machines which most research has shown to be the highest risk activity. If the NGS did not include a category 'Casino based gaming machines' in the question presented in Table 5.5, then the findings may provide a slightly misleading view of how people view casinos. In fact, people might have as negative attitudes towards casino-based EGMs as they do towards EGMs located outside casinos.

39. Another example whether I found there to be a lack of clarity was on p. 59 where there are references to the views of respondents (in support of having gambling, gambling as a resource of government revenue and business enterprise) interviewed in the (NGS) and, in particular, 'respondents from Christchurch'. The number of Christchurch residents who provided valid data in the NGS is not stated and, without it, the reader cannot know how reliable and valid the conclusions drawn are likely to be. If the numbers were small, the conclusions that might be drawn from NGS data would be of reduced weight. This concern applies in every case where this particular data-set has been used as a source of information on gambling in the Christchurch region.
40. I found the terminology 'preferred mode of gambling' to be unclear. Is this the favourite activity of the participants or the one which they choose most frequently? Some greater clarity around this definition would help make the evidence more compelling. The authors use this variable on p. 65 to discuss trends in gambling (largely to show that non-casino EGMs have declined in popularity as compared with casino gambling).
41. It seems odd and unconvincing to cite helpline data as the basis for discussions around people's preferred type of gambling and then to conclude (p. 65) that: 'casino gambling appears to be the mode of gambling which has changed least in its level of popularity or preference over the last decade', when the comparison appears to be between help-seekers and an earlier Ministry of Health Survey which was based on the whole population. This does not constitute a valid comparison given that help-seekers may often differ in their demographic characteristics from the general population of gamblers, e.g., they often gamble on a wider range of activities.

### Comments on Chapter 6: Social Impacts

42. Chapter 6 is by far the longest chapter of the report and covers a range of issues relating to the social impact of the Casino. The chapter commences with analysis of the benefits or entertainment value of the Casino for patrons as based on various survey sources; it then conducts a series of analyses that attempts to examine the risk profile of patrons who visit the Casino (from low risk to problem gambling); examines the employment experiences of Casino workers as based largely on an exit survey conducted by the Casino itself. These sections are followed by qualitative feedback from businesses which have dealing with the Casino; feedback from community groups; and then much of the remainder of the report contains an analysis of gambling-related harm which draws upon a wide range of reports spanning two decades. There is analysis of the Casino's data on self-exclusion and incident reporting, help-seeking data and analysis of crime data by area and whether these occur in proximity to Casino operations.
43. As with Chapter 5, a strength of this chapter is the fact that it is comprehensive. It covers a wide range of areas and takes advantage of multiple sources of evidence: primary and secondary and qualitative and quantitative. There are a number of sections which are clearly presented and where the results are reasonably self-evident. For example, the consultants present a clear summary of results from the exit survey at the Casino; they present a summary of previous data on incidents reported to the Commission; and they summarise the crime data relating Casino operations.
44. Each of these methodological approaches is not without limitations. Exit surveys do not capture the experiences of current employees; many breaches of self-exclusion provisions will go undetected; and many local area crimes will go unreported and may be difficult to associate with the Casino alone. However, such limitations are common to all data of that type and could not be easily addressed by the consultants. In effect, one has to work with the data which are available.
45. At the same time, I again found a number of sections of this chapter to be hard to follow or lacking in some methodological and structural clarity. For example, the authors make use of a very large number of data sources, sometimes drawn from 20 years ago, some local and some national, so that it can often be difficult to develop a clear and convincing argument about the effects of the Casino's current operations. However, rather than focus on areas

where the argument might be tightened, I will focus on the specific areas where ambiguities or the juxtaposition of divergent data sources potentially gives rise to questions about the validity of the findings.

46. The first question I had arose in the early section of the chapter. On p. 82, the authors make reference to the NGS and people's motivations for gambling. It is clear that the NGS contained motivational questions and that these can be cross-referenced to the type of gambling people's preferred. It was not clear to me why the analysis was solely confined to 'entertainment' only. It was surprising that other known motivations for gambling were not addressed and no explanation was offered for restricting the analysis to entertainment. More information on the range of motivations surveyed and why particular data were chosen would have been useful for readers. Some of the other possible motivations may have been less positive (e.g., people using gambling to regulate their emotions, or escape other problems - often a sign of problem gambling). Even if the focus of this section was on the 'entertainment value' of casino gambling, it would still be important to know how important this motivation was in relation to all others. If, in fact, many other motivations were rated as highly as 'entertainment', then this diminishes the value of this evidence in support of the Casino's benefits to consumers.
47. Chapter 6 also underscored a number of my concerns about the questionable use of qualitative information. There was a tendency (e.g., p. 86, 87, 88, 105-106) for isolated qualitative comments to be reported in support of a particular proposition (the entertainment value of the Casino/ the level of safety and amenity). Once again, the CIR makes no mention of methodology; source of data; what questions were asked; whether the selected comments represent the majority view on the matter.
48. Although a summary of 'themes' is provided in Appendix J, this does not appear to be a complete summary of comments so that a question has to be raised about what other views might have been expressed. I was concerned about the validity of the conclusion on p. 88 'Two independent sources of data both indicate similar levels of harmless and harmful gambling at the Casino.' One of these sources appears to be anecdotal qualitative information and this is not really suitable for reaching this type of conclusion. These concerns diminish the value of some of the evidence relating to the consumer and amenity value of the Casino's activity.

49. The danger of this approach to qualitative analysis is that the evidence can appear convenient or selective. Instead of the conclusions emerging from the data, it sometimes appears that the conclusion is provided first and then a suitable quote is then selected to illustrate the point. I observed this on p. 88, where the authors write: 'that give a strong indication of the nature and extent of the entertainment function of the casino.' Such a conclusion appeared too strong to be supported by such fragmented evidence.
50. Alternatively, there may be long lists of quotes without sufficient indication as to whether the views represented the majority view. For example, on pages 86-87, there are many comments about the safety of the Casino and its value for women or older people (which is possibly true), but it would be good to know how these views were positioned within the larger pool of responses received. In a similar vein, on page 105-106. On p. 108 there is a long list of quotes without any analysis of the themes. The evidence would have been stronger if the CIR had provided a sense of the consensus of opinion and details of attempts to consolidate the themes in a meaningful way (e.g., as is recommended in standard texts on qualitative analysis, e.g., Braun and Clarke's textbook). This may have compromised the validity of the evidence relating to views of businesses or community groups that have contact with the Casino.
51. There were also some examples (similar to those raised in relation to Chapter 6) where I found some of the statistical information hard to follow. For example, on p. 151, in the section where the consultants indicate (from the National Gambling Survey) the percentages of users of EGMs outside casinos and of casino gamblers who are problem gamblers, problem gambling figures are broken down by preferred gambling type, without explanation of how the concept of preference used has been established. 'Preferred' could mean the game type most frequently played or a particular type selected as their favourite by respondents from a list. This. This concern also applies to Paragraph 67 of the Executive Summary. It was not easy to make sense of the phrase: '90% of gambler preferences'.
52. One of the major areas of concern I had about the report was the section relating to the profiling of gambling risk and the conclusion that the level of risk was generally lower than implied by reference to the NGS data. In my view, the consultants' juxtaposition (e.g., paragraph 88) of the NGS data and the Casino's host responsibility data did not justify the implied conclusion.

53. Problem gambling has a particular meaning under the Gambling Act (objective assessment of the external characteristics of an individual's conduct) and the same concept is used in casino HRPs. As it is not an assessment of risk of harm but of detectable cause for concern, it did not seem to be valid to be writing about people as not being 'at risk of harm' based on the HRP system data. The Casino's classification of people is essentially binary and based on quite different criteria. A person's status as a Gambler of Interest (GOI) can arise from self-reports from gamblers, but also third party observations (e.g., Casino staff). In other words, the GOI classifications are largely based on observable behaviour or possibly due to some element of their playing, but all the other more internal/ hidden aspects of the gambling that are picked up in standardised self-report instruments would be absent.
54. It is possible that only the more severe or observable cases of problem gambling are going to be included in the category of 'Risk Identification Escalated' and 'High Risk Response'. For this reason, I think that it would be unwise to read Table 6.6 in the CIR and assume that PGSI based classification from the NGS and the casino classifications can somehow be compared as if they are referring to similar categories. In my view, the PGSI-based results from the NGS also have little to say about harm because the PGSI is not a harm measure; rather it is merely a way to identify people who may be more likely to be experiencing harm based largely on their self-reported behaviours and appraisals of their own gambling. I don't think that the HRP data can be used to indicate the level of harm in the Casino either. Instead, such data records what cases were considered actionable by the Casino as opposed to those being actually harmed as based on some validated standard on harm or problem gambling.
55. For these reasons, I had some concerns about this part of the CIR and would advise caution in the interpretation of Tables 6.29, 6.30 and 6.31). I would recommend that such data should be treated differently. In my view, the two sources of data should be treated separately without trying to make comparisons between them. I also recommend that an attempt be made to locate or obtain other venue based research to estimate the likely proportions of PGSI classified gamblers visiting the Casino.
56. On the information available to me, the rates of problem gambling in people engaging in Casino gambling (and particularly on a weekly basis) are typically found to be higher than for other forms of gambling. This was confirmed, for example, in a report by O'Neil et al. (2016)

for Gambling Research Australia in which analysis of prevalence data from 3 Australian States was conducted. A reason for this is that Casino gambling tends to attract a higher proportion of younger males who are statistically more likely to report problems associated with gambling.

57. In other words, if the Casino were to conduct a survey of patrons and administer the PGSI, they would potentially detect a higher rate of problem gambling than other gambling venues (e.g., clubs or hotels with EGMs). It would not necessarily follow, however, that the characteristics of those who are detected as GOIs would match this profile. The help-seeking literature generally shows that young males are less likely to seek help for gambling problems or self-identify as having problems, although this not preclude the ability of casinos to identify them through observable behaviour.
58. There were also sections (e.g., p. 90) relating to women's employment where information was drawn from Australian Institute of Gambling Research (AIGR) reports which were 20 years old. It was not clear to me how relevant some of this material was for informing the Commission's current deliberations.

*Gambling in Maori and Pasifika people*

59. Some caution must be applied in the extent to which the CIR has investigated the impact of their operations on these cultural groups. No specific primary research was conducted to investigate these groups and much of the evidence is based on inferences drawn from broader surveys (p. 121). On p. 121, the authors have drawn upon the NZ Harms report to report a "slightly declining trend in gambling at the Christchurch Casino amongst Maori...", but it would have been useful for more information about the numbers of people involved or the sample size so as to gain insights into the reliability of this information. I found the following information in the chapter concerning the cultural background of contacts to the helpline to be more useful because it indicated the numbers involved, although it also indicated that caution has to be applied because of the relatively small number of cases (e.g., in Tables 6.34 and 6.35).

