

8 August 2018

Gambling Commission New Zealand

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PO Box 137295,

Parnell,

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**Submission on the application by Christchurch Casinos Limited for a renewal of Casino Venue Licence under Section 134 of the Gambling Act (2003)**

Disclosure: I am a current, full-time employee of Christchurch Casinos Limited.

This submission is made in support of the application made by Christchurch Casinos Limited to renew their Casino Venue Licence.

I wish to focus on the Host Responsibility measures the applicant makes, as that is my field of expertise.

In my opinion the applicant takes a very proactive approach to minimising the harms from the provision of alcohol and gambling at their venue. Often the extent of these efforts is not well known to members of the public, if at all. The casino has a detailed Host Responsibility Programme, Problem Gambler Identification Policy and Responsible Service of Alcohol Policy, all of which are publically-available on the casino's website. It should be noted however that this aspect of the business is challenging, as some problem gamblers will attempt to conceal their behaviour.

It is important to examine how Host Responsibility has continually evolved since Christchurch Casino opened in 1994, due to research, advancements in technology and the casino's learnings from experiences.

I know the applicant operates with a genuine desire to minimise any harms associated with alcohol and gambling. Any assessment should include their responses to cases and incidents, including their recording of information, disclosures made to regulators and their application of any learnings via policy and procedure changes.

The applicant reports to the Gambling Commission annually on its Host Responsibility activities. I believe it is important to note Christchurch Casino's use of the Gambling Act to actively manage problem gamblers. The reported figures do not necessarily convey the true progress that is being made. For example, a Self-Exclusion Order could be the result of the casino intervening with that individual, or a Casino-Exclusion Order could have been issued to actually extend an individual's Exclusion period. The changing use of Gambler of Interest files can also be included in any such review of these reported figures.

I would also encourage the assessment of the casino's efforts to go beyond the minimum required by the Gambling Act, related Regulations or its Host Responsibility Programme. One example is Christchurch Casino's voluntary effort to contribute to relevant conferences and forums (including those in Australia and Europe) and also cooperate and collaborate with other NZ, Australian and Asian casinos and share ideas and learnings around Host Responsibility. Another example of voluntary effort is the significant investment Christchurch Casino makes in developing new technology to assist with Host Responsibility.

I believe Christchurch Casino is a world-leader in proactive harm-minimisation. My opinion comes from having compared the applicant's (or any other NZ casino's) Host Responsibility practices and other jurisdictions' best practice measures, such as British Columbia's 'RG Check' accreditation programme, for example.

I do not wish to attend and be heard at the public hearing of the application.

Details of submitter:

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