

Lyn Beverley  
Secretary  
Joint Select Committee on Gambling Reform  
Parliament House  
CANBERRA ACT 2600

1 February 2011

Dear Ms Beverley,

Thank you for the opportunity to make a further submission in relation to the Committee's current inquiry.

On behalf of myself and Dr Woolley, I would like to make further submissions in relation to the submission by Clubs Australia, which we understand makes some reference to our work and notably our 2008 report for the Independent Gambling Authority of South Australia (Livingstone et al 2008).

The Clubs Australia submission refers to a critique of our report undertaken by Professor Blaszczynski and Dr Nower, and asserts that the Blaszczynski & Nower (2008) report demonstrates that members of the Australian Government's Ministerial Expert Advisory Group on Gambling 'disagree' amongst themselves. We note that the reference by Clubs Australia to our work occurs in a section of their submission which addresses the nature of evidence around the effectiveness or otherwise of pre-commitment systems or strategies. It is important to note that Livingstone & Woolley (2008) did not discuss this issue, since it was not canvassed in the brief for the project which gave rise to the report. Why Clubs Australia has seen fit to incorporate this comment is therefore rather puzzling.

It should be further noted that the Blaszczynski-Nower report was a critique of Livingstone & Woolley (2008), commissioned and paid for by the (then) Australian Gaming Machine Manufacturers Association (AGMMA, now Gambling Technologies Australia). It was not undertaken as a peer review as that term is understood in the context of academic publication. In an inquiry into various legislation dealing with poker machines undertaken by the Senate's Community Affairs Committee in 2008 we addressed the contents of that report, given that AGMMA had provided it to the Committee and based a proportion of their submission on that document. We extract a relevant section of that earlier submission (below) for the information of members of the present Joint Select Committee.

Professor Blaszczynski is certainly a gambling researcher of some experience and reputation and, indeed, we drew upon his work and that of his colleagues at some length in both the IGA report and the 'Risky Business' article (Livingstone & Woolley 2007), as examination of the reference lists for both those works will demonstrate.

However, we respectfully contend that neither Professor Blaszczynski nor Dr Nower are particularly experienced in multi-method social science research of the type we employed for the IGA research, and particularly in relation to qualitative methodologies. The method they have adopted to construct their criticism of the report is to posit an idealised methodology, against which they endeavour to compare the research we actually undertook, in order to conclude that our methodology was inadequate.

For example, the Blaszczynski & Nower critique suggests (at p.4) that we should have assessed the population of problem gamblers on a venue by venue basis. Such a project would indeed be valuable, but would require both the co-operation of all local gaming venue operators, and an extensive (and expensive) data collection exercise across a very large number of sites. Such a project would require very substantial funding and would best be undertaken as a large-scale 'stand-alone' project. The exploratory approach which we explicitly adopted in our project, although it certainly points to the need for such a project, was never intended to encompass such a large-scale methodology. Nonetheless, we did indeed attempt to arrange a more modest program of in-venue interviews with EGM gamblers, through the Australian Hotels Association in South Australia, but despite repeated attempts and considerable patience on our part we were ultimately unable to arrange such access, despite what we believed to be genuine assistance from the AHA.

Telephone surveys are also attacked in the Blaszczynski & Nower critique (again at p.4), despite being extensively utilised in the gambling and other literature, and the non-representative nature of our telephone-derived sample is further criticised. Of course, what is ignored in this critique is the simple fact that we did not claim the sample to be representative or randomised – we simply sought to obtain the views and perceptions of people who gambled regularly. For this reason, our sample was explicitly a convenience sample which targeted areas of known high EGM density and use. We have not claimed that the results of this survey are generalisable to the population as a whole. Rather, this methodology was part of a strategy of data triangulation.

Blaszczynski & Nower also suggest (again, at p. 4) that our use of a fortnightly frequency of gambling to indicate regularity of EGM use, and the use of the CPGI 3+ level to indicate gambling problems, are arbitrary and uninformed by the literature. In fact, as we make clear on p. 69 of the IGA report, (to which Blaszczynski & Nower 2008 specifically refer in their critique) we derived these definitions from the most recent South Australian prevalence study (South Australia 2006, p.122) and did so in order to permit interested readers and the IGA and other regulators to interpret our conclusions in the context of the data provided by that South Australian prevalence study.

In any event, our purpose in adopting a multi-method approach was to facilitate 'triangulation' of information between our telephone survey and other data sources – in this case, the views of self-identified problem gamblers in treatment (the qualitative sample we identified with the help of gambling counselling agencies), and data provided by the Office of the Liquor and

Gambling Commissioner, detailing the performance of certain specific EGM games operating in South Australia. This process of triangulation is a method utilised extensively in social science research to cross-validate research data. We believe it provides a basis for reasonably and reliably addressing research questions of the type we were asked to investigate.

We strongly contend that our conclusions are consistent with the evidence presented, and provide a basis for identifying a number of issues raised by the research questions we were asked to address. Further, we strongly believe our conclusions are modest, based on available evidence, and completely defensible.

We again thank the Committee for the opportunity to make these further submissions. We would of course be happy to further assist the Committee should that be required.

Yours faithfully,

Charles Livingstone.

## References :

- Blaszczynski, A. & Nower, L. (2008) Final Report (Critique of Livingstone & Woolley 2008), Australian Gaming Machine Manufacturers Association
- Livingstone, C. & Woolley, R. (2007) 'Risky Business: A Few Provocations on the Regulation of Electronic Gaming Machines' in *International Gambling Studies*, 7(3): 361-376
- Livingstone, C., Woolley, R., Zazryn, T., Bakacs, L., & Shami, R. (2008) The Relevance and Role of Gaming Machine Games and Game Features on the play of Problem Gamblers, Independent Gambling Authority South Australia, Adelaide