



CHRISTCHURCH  

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CASINO

**HOST RESPONSIBILITY PROGRAMME  
CHRISTCHURCH CASINOS LIMITED**

**Report to the Gambling Commission  
For the 12 months ending  
31 December 2014**

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## **1. Introduction**

This is Christchurch Casino Limited's (CCL) second report on the implementation of its Host Responsibility Programme (HRP) and Problem Gambler Identification (PGID) Policy, which replaced the prior Responsible Gambling Program (RGP) which had been in force since the casino first opened.

The HRP has the following objectives:

- 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
- 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.

CCL has a "whole of Business" approach to Host Responsibility and is confident that the policies and processes in place during 2014 achieved the objectives in the HRP. CCL will continue to analyse, measure and improve its processes to ensure it is an Industry leader in Host Responsibility.

The HRP is currently under review by the Gambling Commission with a decision expected early in 2015 that may result in minor changes.

This report highlights key HRP related activities undertaken in the 12 months to 31 December 2014. Appendix A of the report contains the gambling related measures required by section 3 of the HRP.

## **2. Resources**

During the period this report relates to CCL employed a dedicated Host Responsibility Manager (HRM) to oversee all aspects of the HRP and PGID. The HRM was supported at a senior Management level by the Host Responsibility Group (HRG) which comprises the HRM, Risk and Compliance Manager, Security and Surveillance Manager and the Gaming Manager. The HRG meets monthly to maintain an overview of the operation of the HRP and deal with any particular issues that have arisen in the previous month.

The HRM dealt with the day to day operation of the HRP, including interventions, exclusions and re-entry interviews. In the absence of the HRM the casinos Security Shift Managers are fully trained and deal with requests for exclusions, casino exclusions and any breaches of exclusion that occur.

Following the resignation of the incumbent HRM late in 2014, a review of the position was undertaken and it has undergone a change of name to Host Responsibility Executive, and a change of location in the organisation as it will now sit in the Surveillance and Security domain. This gives the position more immediate support from Surveillance staff who are the Casinos 24/7 "eyes and ears", and also allows a greater focus to be given to frontline security and gaming staff, empowering them to deal directly and with greater immediacy with exclusions and potential problem gamblers.

At the front-line level all CCL staff are fully trained in Host responsibility and provide the "eyes and ears" of the HRP. All staff, and all Departments, are responsible for observing any possible signs of problem gambling or other issues and reporting and/or recording those observations for the HRM to follow up.

### **3. Key areas of activity**

#### **3.1 Data collection and analysis**

CCL adopts a "whole of business" approach to the collection of data to support the HRP. This starts at the "front line" with all staff trained and encouraged to report their observations either to a supervisor or directly themselves into the Host Responsibility log. (Events that require immediate intervention, for example a customer request for self-exclusion, are escalated and dealt with immediately either by the HRM or the Security Shift Manager). The entries in the HR Log are analysed by the HRM and form a valuable part of the base information collected to assist in achieving the objectives of the HRP.

The number and variety of entries in the HR Log reflect the good "buy in" by front line staff to this process. An important part of the process is that the HRM responds to each entry made detailing the actions taken. In this way staff can see that the observations are both taken seriously and that they play an important part in the success of our HRP.

The Casinos Surveillance and Security Department records their observations and interactions with customers in an "in house" security and surveillance database which the HRM has access to. The HR Log entries, along with loyalty data and surveillance and security observations give the HRM the best possible data to work with in assessing potential and actual problem gamblers.

#### **3.2 PRE-COMMITMENT**

CCL enabled the pre-commitment module of the new Bally Casino EMS in April 2013 to provide another tool to assist customers in controlling their own gambling. The system allows customers to voluntarily set limits on how much they spend and/or how much time they play for on the gaming machines.

The system provides notifications to both the gaming machine player and the casino when 80% of the set limits are reached and again when the limits are reached or breached. Once the limits are reached the customer can no longer earn promotional bonus points or enter into promotions.

The notifications are considered as a general indicator in terms of problem gambling. Multiple limit exceeded notifications in any one visit to the casino are followed up immediately by the duty Gaming Shift Manager who will observe and then intervene with the customer if other indicators are observed as well.

The pre-commitment system is also used as a tool to monitor formerly excluded customers who are allowed to re-enter the casino. These customers must use their loyalty cards when playing and must, (if gaming machine players), set limits using the pre-commitment system, to allow their amount spent and time on site to be monitored.

Generally the pre-commitment system has been well received by the small percentage of gaming machine customers who have taken advantage of it. The initial analysis of the use of the system since April 2013 shows that for this small group of customers the pre-commitment system enables them to voluntarily control their gambling within their set limits.

### **3.3 STAKEHOLDER ENGAGEMENT**

The HRM has regular contact with all of the Problem Gambling Service Providers in Christchurch, both when referring CCL customers to their organisations as well as receiving reports from, the organisations when the services have been used.

As well as this on-going operational contact, the HRM convenes a quarterly Problem Gambling Liaison meeting with representatives from the Problem Gambling Foundation, The Salvation Army Oasis centre, and the Department of Internal Affairs. This gives those organisations the opportunity to provide feedback and raise any areas of concern with the HRM and senior CCL Management. The uncertainty surrounding ongoing funding for the PGF caused some disruption in trying to arrange regular meetings in the second half of the year.

The HRM also has regular contact with the Department of Internal Affairs Gambling Inspectors when on-site both to discuss operational events such as individual breaches of exclusion, as well as part of the Departments normal audit program for monitoring the HRP.

In regard to the Responsible Service of Alcohol (RSA) part of the overall HRP, the HRM is in regular contact with both the NZ Police and the District Licensing Agency in regard to the RSA.

### **3.4 OTHER AREAS OF INTEREST**

#### **Hospitality NZ Awards 2014. CCL was again the winner of the "Excellence in Host Responsibility" Category.**

In 2014 CCL was again judged the winner of the Hospitality NZ awards in the category of "Excellence in Host Responsibility". Although the primary focus of the competition was related to the RSA and related legislation, CCL's overall approach to Host Responsibility and the "buy in" of staff at all levels to the HRP were factors that contributed greatly to CCL's back to back success in this award.

### **Victoria Street Safe Initiative**

In 2014 CCL took the concept of Host Responsibility beyond the casino walls and was a driving force in the Victoria Street Safe Initiative, (VSS), which involved all restaurants and bars in Victoria Street working together to make the Street a safe and pleasant environment for all street users including residents. Funding from the Council was obtained for a trial that involved extra high visibility patrols of "VSS Ambassadors" who worked at moderating undesirable behaviour in and around the licensed venues. The venues were all encouraged to employ a closed door policy to anyone refused entry or removed from any of the venues.

Despite the success of the trial, further funding from the Council for this initiative is not available, and the venues by themselves were not able to continue to fund the extra staff needed, so the initiative was put on hold for a time. CCL has always been a strong advocate for the VSS and with assistance from a new local bar called The Bog has the initiative back up and running for the southern part of Victoria Street between Kilmore and Salisbury Streets.

### **MVE (Multi Venue Exclusions) & Multi Casino Exclusion Processes**

CCL has continued to embrace both the multi-casino exclusion process as well as the MVE process that covers all venues both casino and non-casino. This has involved many challenges, Not the least of which has been the quality of information (and photos) coming from the MVE process when compared to the information and photos we collect for our own customers who exclude or are excluded. Quantity of information is also a problem with the sheer number of SkyCity exclusions notified to us compared to CCL's usual number of exclusions.

## Annex A - Reporting Measures

<b>Measure</b>	<b>Source of data</b>	<b>Description</b>	<b>Result</b>
1. Number of customers about whom there have been observations.	Christchurch Casino	The total number of Christchurch Casino customers who have been observed showing one or more signs of problem gambling. These observations are reported in the Host Responsibility Log, Surveillance GOI reports and Security Incidents.	Total = 813 Surveillance reports for patrons under active observation = 290 Specific GOI information referenced on surveillance reports = 144 Strong indications of problem gambling observed on reports = 27 Observations made by staff from other departments = 352
2. Number of indicators reported to Host Responsibility.	Christchurch Casino	Total number of observed indicators of problem gambling in Host Responsibility Log and GOI reports.	551
3. Number of approaches to Christchurch Casino by third parties.	Christchurch Casino	Number of people approaching Christchurch Casino with concerns about a customer.	6
4. Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of problem gamblers identified by the Casino.	Christchurch Casino		185 exclusions in total = 108 Self-exclusions, 77 Casino exclusions.
5. Number of customers on incident spreadsheet.	Christchurch Casino	Number of individual customers in the Host Responsibility Log	310

<p>6. Number of GOI files by:</p> <ul style="list-style-type: none"> <li>- Ethnicity</li>   <li>- Gender</li>   <li>- Age</li>   <li>- Preferred mode of gambling (tables/EGMs).</li> </ul>	<p>Christchurch Casino</p>	<p>Number of GOI files that were opened in 2014 with breakdowns by ethnic, gender, age and preferred mode of gambling (table games or gaming machines), includes confirmation of re-entry GOI's created.</p>	<p>Total = 70</p> <p>European - 26 Asian - 31 Indian - 6 Maori/Islander - 7</p> <p>35 x Male, 35 x Female</p> <p>20-29 yrs = 6 30-39 yrs = 11 40-49 yrs = 8 50-59 yrs = 24 60+ yrs = 15 Not specified = 6</p> <p>Gaming Machines = 29 Table Games = 24 Not Specified = 17</p>
<p>7. Number of interventions conducted with customers.</p>	<p>Christchurch Casino</p>	<p>Total of Security reports entitled Casino or Self Exclusion, Interview conducted, Third party enquiries, Breach of Exclusion, Children found abandoned, HR Customer Contact or Enquiry and re-entry interviews whether confirmed or denied.</p>	<p>370</p>
<p>8. Number of approaches to customers to offer information about self-exclusion.</p>	<p>Christchurch Casino</p>	<p>Total number of times information about Self exclusion in the form of written material has been offered, given or mailed to customers and third parties.</p>	<p>120</p>

<p>9. Number of Exclusions by:</p> <ul style="list-style-type: none"> <li>- Ethnicity</li>   <li>- Gender</li>   <li>- Age</li>         <li>- Preferred mode of gambling (tables/EGMs)</li>   <li>- Prompted by third party disclosures</li>   <li>- Exclusion type (Self/Casino)</li>   <li>- Timeframe</li>     <li>- Following re-entry</li> </ul>	<p>Christchurch Casino</p>		<p>Total = 185</p> <p>European - 75 Asian - 69 Indian - 22 Maori/Islander - 15 Arab - 3 African - 1</p> <p>133 x Male, 52 x Female</p> <p>20-29 yrs = 48 30-39 yrs = 52 40-49 yrs = 29 50-59 yrs = 36 60+ yrs = 18 Not Specified = 2</p> <p>Gaming Machines = 52 Table Games = 100 Games not specified = 33</p> <p>6</p> <p>108 Self exclusions 77 Casino exclusions</p> <p>24 Months = 130 18 Months = 0 12 Months = 26 06 Months = 4 03 Months = 25</p> <p>4 Re-Excluded</p>
<p>10. Number of customers participating in multi venue Exclusions.</p>	<p>Christchurch Casino</p>		<p>20 MVE applications processed. 12 were initiated by PG treatment providers</p>
<p>11. Number of customers participating in multi casino Exclusions.</p>	<p>Christchurch Casino</p>	<p>Total is all patrons notified to Christchurch Casino that have been excluded from other casinos in NZ.</p>	<p>573</p>
<p>12. Number of customers participating in Agreed Limitation programme.</p>	<p>Christchurch Casino</p>	<p>Customers participating in VIP Agreed Limitation arrangements over the reporting period.</p>	<p>0</p>

<p>13. Number of Excluded customers agreeing to be contacted by help services on exclusion form.</p>	<p>Christchurch Casino</p>	<p>While Christchurch Casino encourages all customers during the exclusion process to seek help from problem gambling service providers, ultimately this is a decision for the customer.</p> <p>It should also be noted that excluded customers may contact counselling services independently after their exclusion and the Casino would not be notified. Excluded customers are required to undergo counselling as part of re-entry conditions.</p>	<p>0</p>
<p>14. Number of new and total clients citing casino gambling (by EGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counselling services by:</p> <ul style="list-style-type: none"> <li>- Gamblers</li> <li>- Significant others</li> <li>- Mean SOGS scores</li> <li>- Ethnicity</li> <li>- Gender</li> <li>- Age</li> <li>- Self-reported dollars lost</li> </ul>	<p>MoH Report</p>	<p>The Ministry of Health no longer reports service user data as shown in this particular measure (14) or in measure 15. (Average SOGS scores). The only service user data now reported by MoH by gambling mode is the total number of clients (both new and continuing) that have received support for their own, or someone else's gambling.</p>	
<p>15. Average SOGS scores of clients citing casino gambling as the primary mode who utilise face-to-face counselling services.</p>	<p>MoH Report</p>	<p>Refer to comment in measure 14. above.</p>	

<p>16. Number of breaches of Exclusion by:</p> <ul style="list-style-type: none"> <li>- Ethnicity</li> <li>- Gender</li> <li>- Age</li> </ul>	Christchurch Casino	Breaches of current Self and Casino exclusions regardless of length of exclusion result in a two year trespass notice being issued and the Gambling Inspectors notified for any further action if required.	<p>Total = 35</p> <p>Asian = 14 European = 14 Indian = 7 Maori/Islander = 0</p> <p>Male 29, Female 6</p> <p>20 to 29 yrs = 12 30 to 39 yrs = 9 40 to 49 yrs = 6 50 to 59 yrs = 4 Over 60 yrs = 4</p>
17. Number of successful and unsuccessful applications to re-enter following exclusion.	Christchurch Casino		<p>28 re-entry applications received and interviews conducted.</p> <p>21 x allowed re-entry 7 x declined re-entry.</p>
18. The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and employee).	Christchurch Casino	Total of all patrons in HR log, interviews, plus all exclusions created or renewed, HR Enquiries and HR Customer Contacts.	615
19. Number of persons trespassed or required to leave for making loans for financial gain.	Christchurch Casino		1

**Measures relating to Responsible Consumption of Alcohol**

20. Number of "Under the Influence" (UTI) incidents (internal report).	Christchurch Casino	<p>Christchurch Casino for full 12 months reporting, includes Mashina Lounge.</p> <p>(NB CCL has improved its reporting process to capture all incidents in a single database</p>	<p>5229</p> <p>Casino - 3811 Mashina - 1418 (Patrons approached to assess UTI)</p>
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<p>21. Number of requests for people to leave due to the amount of alcohol consumed.</p>	<p>Christchurch Casino</p>	<p>Christchurch Casino for full 12 months reporting includes Mashina Lounge.</p> <p>(NB Number of incidents which have resulted in a request to leave. Some incidents have involved more than one person)</p>	<p>3332</p>
<p>22. Number of Police contacts citing Christchurch Casino as venue where their last drink was served.</p>	<p>Police Alcolink database</p>	<p>The Police Alcolink is an indicative tool only.</p> <p>The Police have also indicated they enjoy a good working relationship with the Casino and have no significant concerns.</p>	<p>The Police Alcolink database records 72 separate references in relation to CCL. (61 individuals of which 44 were male and 17 female)</p> <p>Of the 61 individuals the degree affected by alcohol is stated as:</p> <ul style="list-style-type: none"> <li>• 2 Not recorded</li> <li>• 17 slight</li> <li>• 40 moderate</li> <li>• 2 extreme (both of which were initiated by CCL)</li> </ul> <p>The 72 incidents may be summarised as:</p> <p>28 Behaviour related  23 Driving related  21 No relevance to Casino (12 Assaults, 4 Police Warrants / Arrests  4 Domestic and  1 Cannabis)</p> <p>A total of 16 of the incidents reported were initiated by CCL.</p> <p>To put the above figures into context the Casino venue had a total of 781,081 guests including 35,068 into our specialist Mashina Lounge for the 2014 year. Therefore the 61 individuals noted represent just 0.0078% of our total visitation.</p>

<b>Measures relating to Employee Training</b>			
<p>23. HR1 courses</p> <p>HR2 courses</p> <p>HR3 courses</p> <p>Refresher training</p> <p>Number of employees who need to be trained in each category, and proportion of those employees that have completed the appropriate level training.</p>	Christchurch Casino		<p>Problem Gambling Awareness</p> <p>276 Licensed Employees</p> <p>263 PG trained 13 pending</p> <p>41 PG trained in 2014 109 PGR trained in 2014</p> <p>Responsible Service of Alcohol</p> <p>115 F&amp;B front of house and management employees</p> <p>75 trained 40 pending</p>
<p>24. Employee recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures.</p>	Christchurch Casino	The only measure of this to date under the HRP is the results as in 26. Below relating to the testing conducted during HRP training in 2014.	Average over all courses 17.99/20 = 89.95%
<p>25. Employee Perceptions on the effectiveness of the Employee Gambling Harm Programme.</p>	Christchurch Casino	CCL is still developing a process to measure this.	CCL is still developing a process to measure this
<p>26. Results of tests conducted by employees relating to host responsibility and associated policies and procedures.</p>	Course Evaluations	Average over all Courses conducted in 2014	Average over all courses 17.99/20 = 89.95%
<p>27. Employees' perceptions of the effectiveness of training.</p>	Course Evaluations	Average over all Courses conducted in 2013, scale of 1 – 7, 1 = poor, 7 = excellent.	Average over all courses = 6.2

<b>Other Programme activity and compliance-related measures</b>			
28. Number of internal and external underage incidents.	Christchurch Casino	Number of underage customers found onsite however were not participating in gaming.	9
29. Number of unattended children.	Christchurch Casino	Incidents where parents or guardians were visiting the casino while they left their child/children unaccompanied.	2
30. Number of people requested to leave the Casino for other reasons.	Christchurch Casino		29
31. Completion of brochure addressing "Children at the Casino".	Christchurch Casino		Completed 2013.