

SECTION 14

APPENDICES

Appendix 14.1 – Current Venue Licence

14

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 -

- (a) The holder of the licence sooner surrenders the licence under section 51 of the 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 -

- (a) The conditions contained in the Act; and
- (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 22nd 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. Lohri
Chairman



SCHEDULE - CONDITIONS ATTACHED TO CASINO VENUE LICENCE

Preamble

1. The following conditions apply to the Casino Venue.
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.
4. In these conditions:

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:

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

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.

8. The Licence Holder shall ensure that:

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

9B. The Additional Gambling Areas will take when the following conditions are satisfied:

- (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:
- (a) effective electronic surveillance in accordance with the Surveillance Standard;
 - (b) an alarm device connected to the entrance of the count room which signals to the security/surveillance department whenever the door is opened;
 - (c) a telephone link;
 - (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);
 - (b) storage facilities for cage inventory;
 - (c) a separate locked compartment for storage of chips and plaques held in reserve 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;
- (b) censure or disciplinary action by a professional body for ethical misconduct;
- (c) censure in any way in relation to a casino in another jurisdiction;
- (d) current investigation (other than routine or periodical inspections) by any 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, its parent company, or any subsidiaries of the Licence Holder or parent company, 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 9 September 2016

Appendix 14.2 – Applicant information form completed by:

- Christchurch Casinos Limited as the applicant

A Company Information Form has also been completed by Skyline Enterprises Limited, as a company with significant influence in the Casino. This application form was submitted in May 2018.

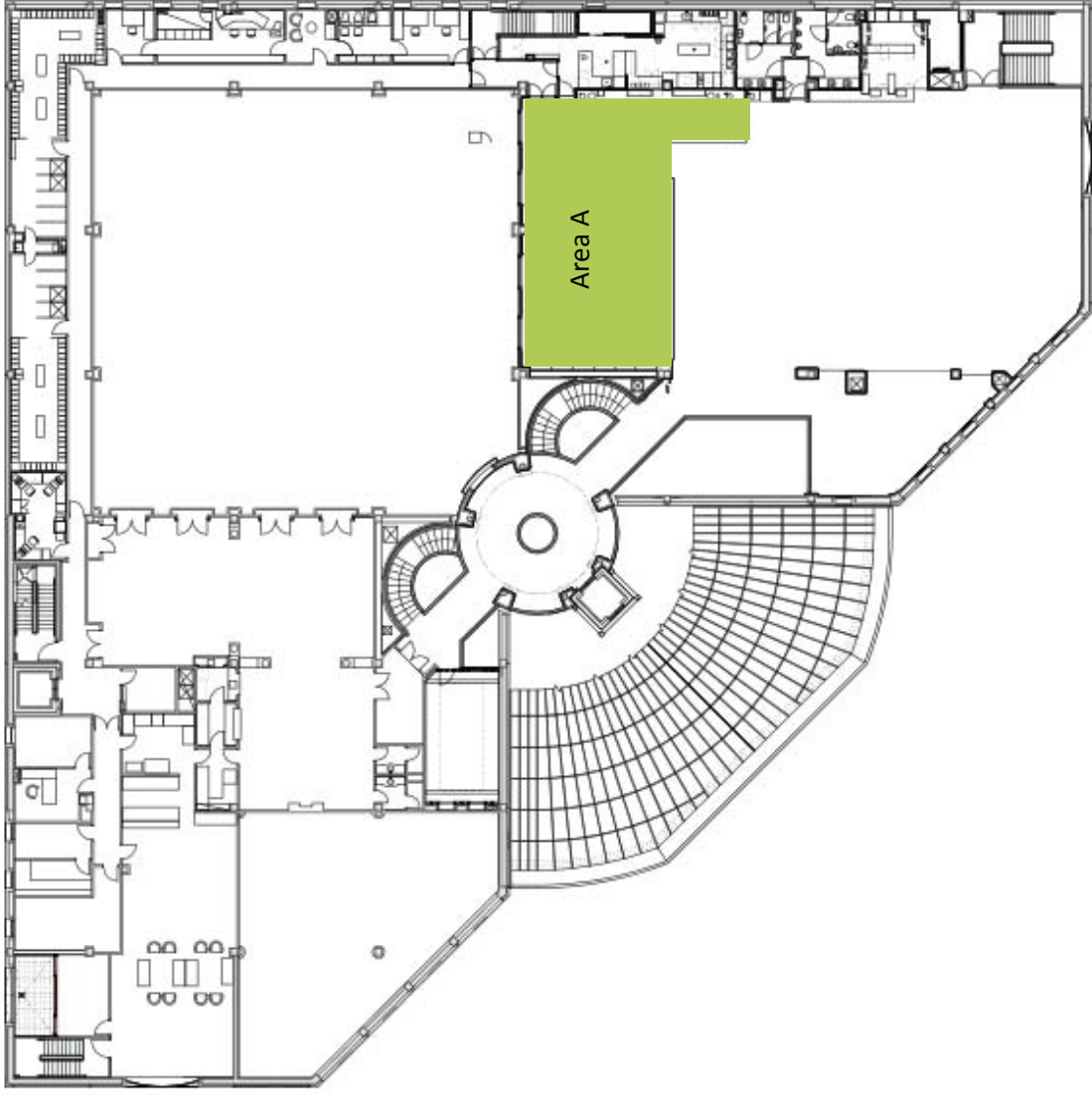
Copies of the above application forms have been removed as they are subject to confidentiality. If you would like to see a copy of these forms, you may make an application direct to the Gambling Commission using the contact details on their website.

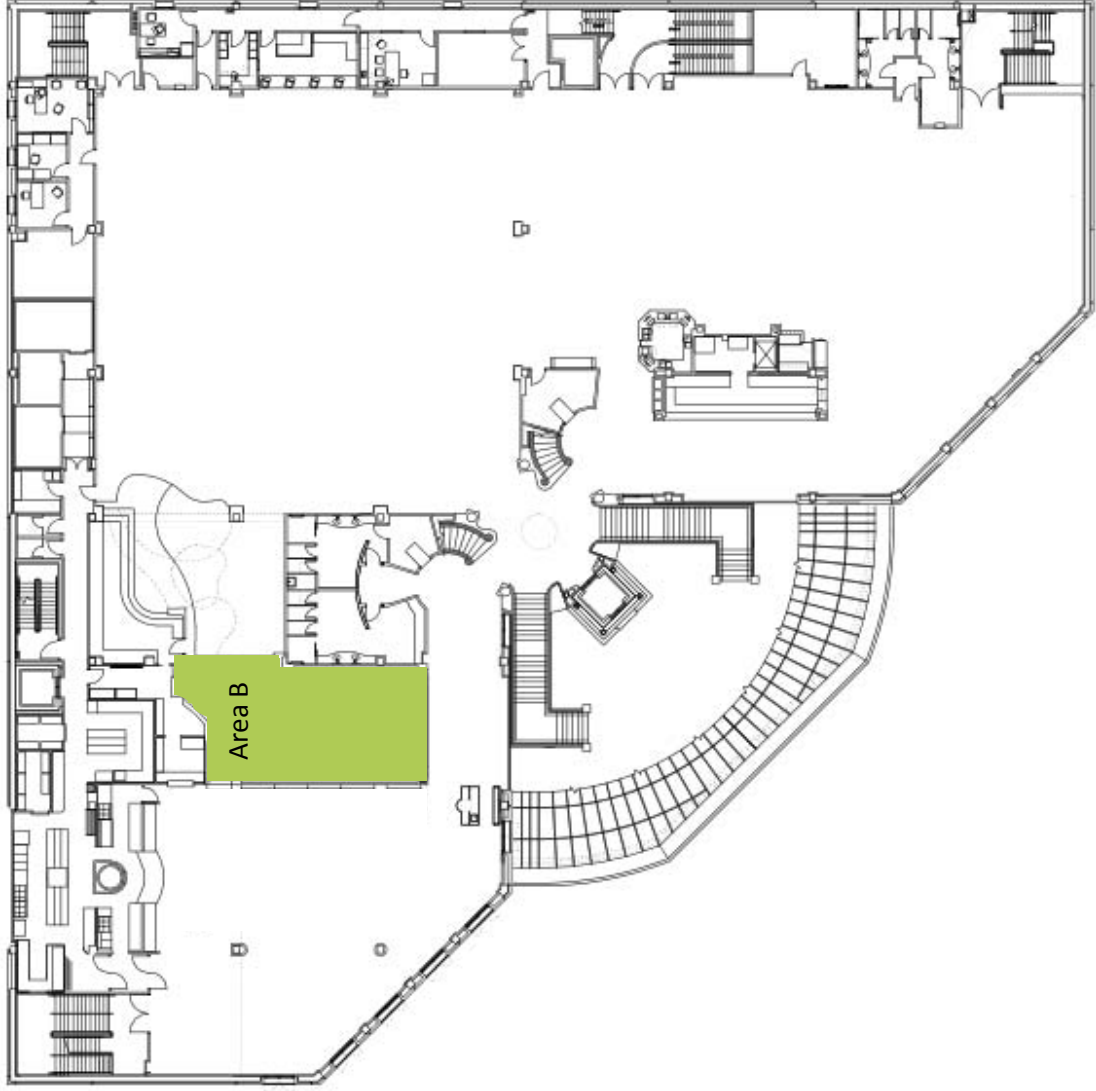
Appendix 14.3 – Personal Information Forms completed by the following persons with significant influence in the Casino:

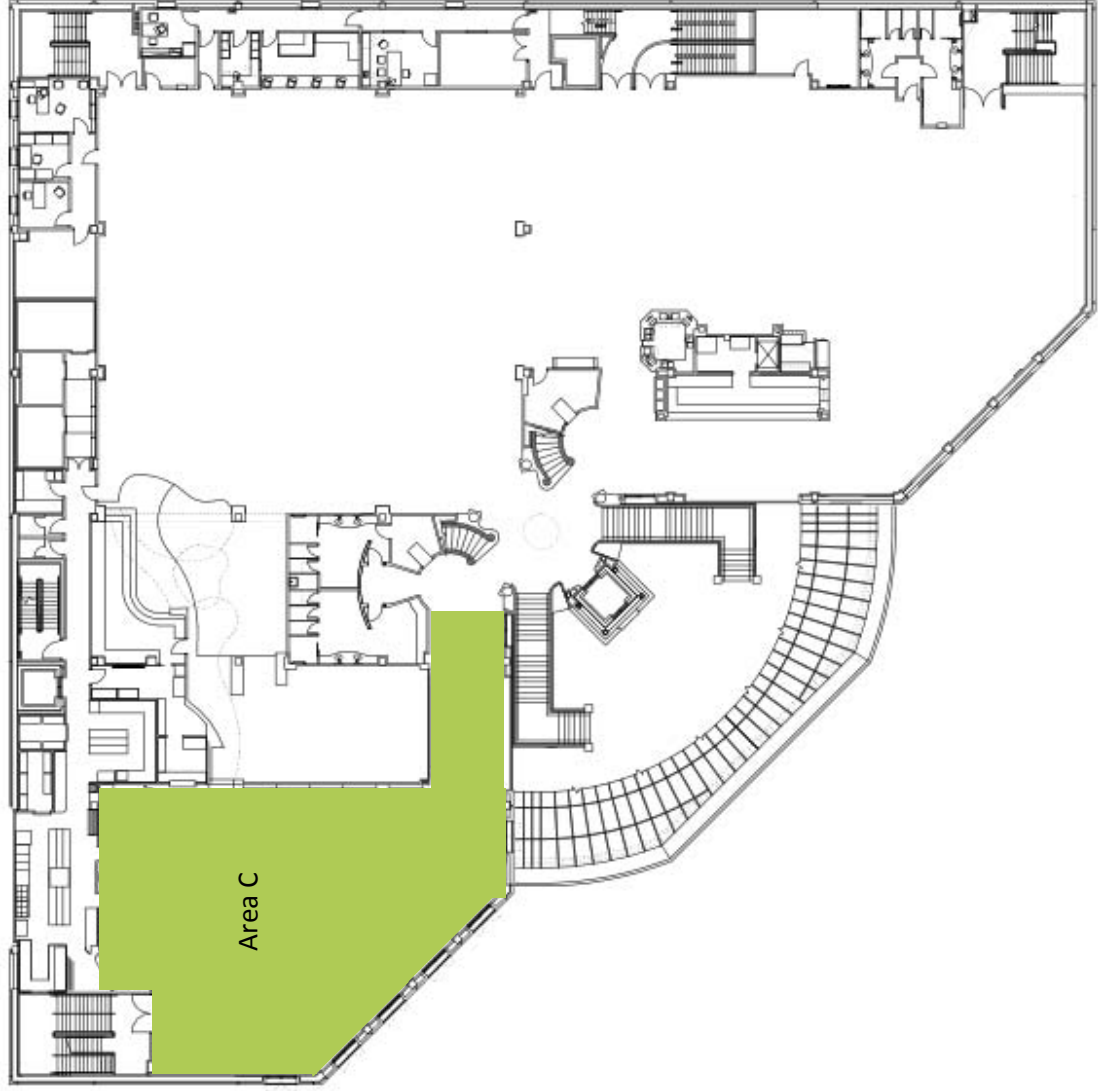
- Alistair Ryan
- Brett Anderson
- Darren Henderson
- Donald Jackson
- Grant Hensman
- Jan Hunt
- Ken Matthews
- Mark Quickfall
- Phillip Hensman
- Richard Thomas
- Sarah Ottrey
- Stuart Anderson
- Tim Bergin
- Bruce Robertson (note this application form was added in May 2018 after Christchurch Casinos Limited identified Mr Robertson as another person with significant influence in the Casino).

Copies of the above Personal Information Forms have been removed from the application as they are subject to confidentiality. If you would like to see any of the above forms, you may make an application direct to the Gambling Commission using the contact details on their website.

Appendix 14.4 – Floor Plans







Area C

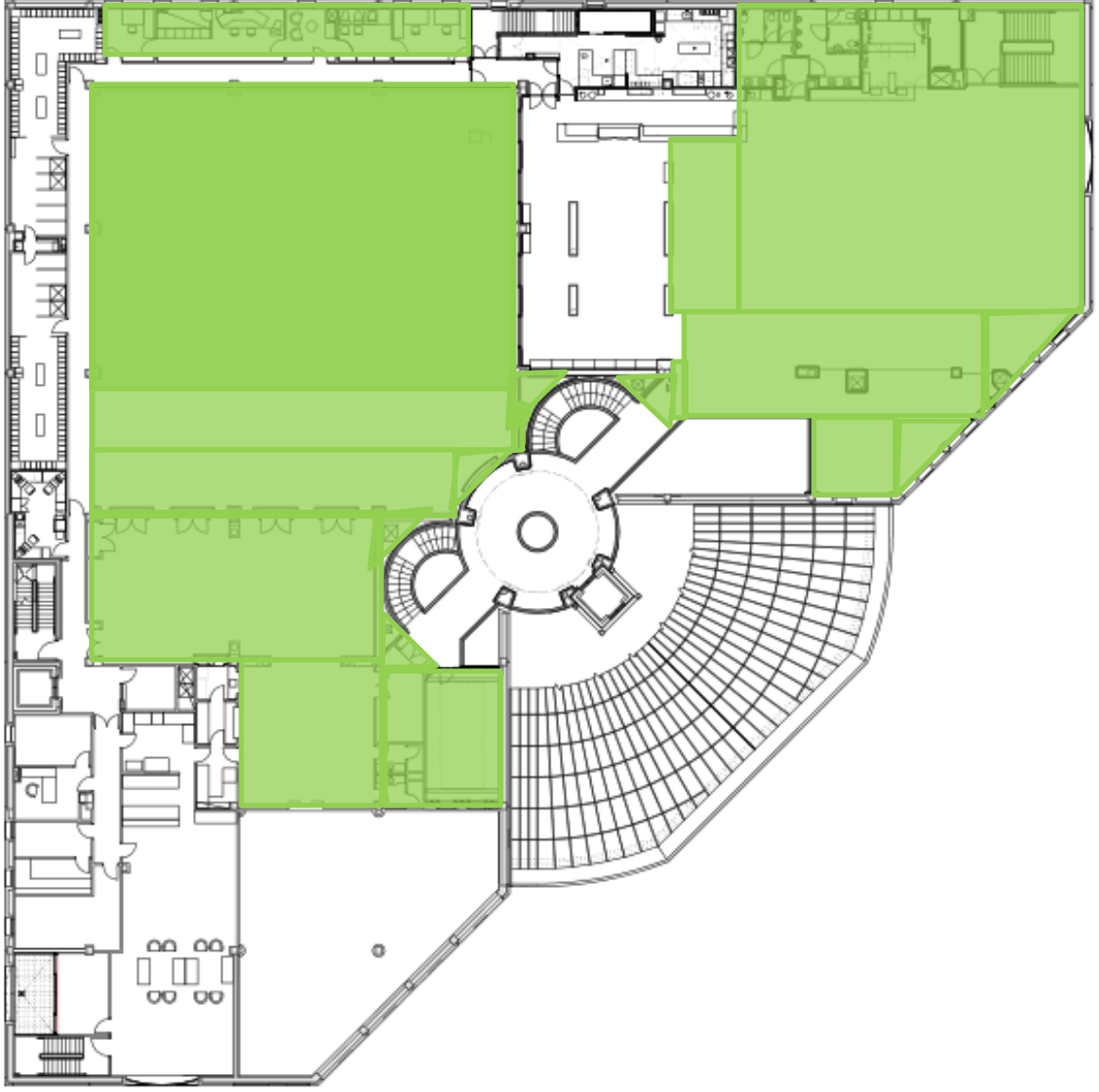


C H R I S T C H U R C H C A S I N O R E F U R B I S H M E N T

0 4 3 0 0 - L E V E L 0 3 - E X I S T I N G

SCALE 1:300 @ A4

 Warren and Mahoney®



Appendix 14.5 (Social and economic expert report) removed due to size – this report is available through a separate link on Gambling Commission website

Appendix 14.6 – DIA audit letters



11 July 2017

Mr. Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
Christchurch 8140

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Dear Brett

Host Responsibility Programme Audit at Christchurch Casino – September 2016

The Southern Casino Compliance Unit completed an audit of the Host Responsibility Programme (HRP) at Christchurch Casino in September 2016.

The audit reviewed the following areas:

- Proactive use of data to identify problem gamblers
- Behavioural data
- Management of continuous play
- The management and analysis of the Problem Gambler Identification Policy indicator data
- Gambling promotions
- Loyalty programme
- Unattended children
- Learning and development
- Responsible service of alcohol
- Monitoring and reporting
- Employee gambling related harm
- Safe gambling environment
- Exclusions
- Underage persons
- Gambling limitations or voluntary pre-commitment
- Displaying signage of gaming information to customers
- Environmental design
- Standards of dress and standards of behaviour

The audit assessed Christchurch Casino as generally meeting the compliance requirements of their Host Responsibility Programme.

The Department believes the effectiveness of the Host Responsibility Programme could be further enhanced by the following:

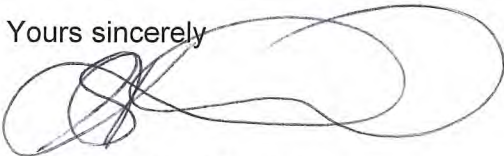
- Carry out an assessment of the recently introduced Servizio system assess the effectiveness.
- Promotions and marketing conducted include 'spike' in spend data analysis to ensure no increase in potential harm occurs due to promotions being run.

- Players Club members are the subject of further analysis. In particular the criteria used to determine movement between tiers to ensure there is not an increase in spend by patrons wishing to remain in their current tier, or wishing to go up a tier.
- Staff training policy to include the possible correlation between alcohol and excess gambling.
- Records maintained of any staff gambling issues.

The Department acknowledges that Christchurch Casino's Host Responsibility Programme is currently being reviewed by the Gambling Commission and a number of the recommendations could well be addressed during that review. These areas will form part of the next HRP audit.

Please contact me on (03) 339-5517 should you wish to discuss anything regarding the audit.

Yours sincerely



Sonya Karatau-Neeson
Acting Team Leader
Southern Casino Compliance
Sonya.karatau-neeson@dia.govt.nz

cc Tim Bergin
Risk and Compliance Manager

INTERNAL AFFAIRS



Te Tari Taiwhenua

02 August 2017

Mr. Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
Christchurch 8140

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Dear Brett

Licence Conditions Audit – February 2017

The Southern Casino Compliance Unit completed an audit of the Licence Conditions at Christchurch Casino in February 2017.

The audit reviewed the following areas:

- Notifications and Gambling Areas
- Floor Plans and Game Mixes
- Associated Persons
- Business Continuity Requirements
- ATM's and EFTPOS Terminals
- Cage, Count Room and Chip Bank
- Host Responsibility Programme
- Charitable Trust

The audit assessed Christchurch Casino Limited as complying with the conditions of their Premises Licence and Operator's Licence.

Please contact me on (03) 339-5517 should you wish to discuss anything regarding the audit.

Yours sincerely

Pete Collins
Senior Gambling Inspector
Southern Casino Compliance
Pete.collins@dia.govt.nz
(03) 339-5513

cc Tim Bergin
Risk and Compliance Manager

24 July 2017

INTERNAL AFFAIRS



Te Tari Taiwhenua

Mr. Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
Christchurch 8140

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Dear Mr. Anderson

EGM Audit at Christchurch Casino – May 2017

An on-site audit was conducted to ascertain Christchurch Casino's level of performance in the area of its Electronic Gaming Machines (EGM) operation.

The objectives of the EGM audit were to assess the effectiveness of Christchurch Casino's internal systems and processes in meeting the requirements of the Gambling Act 2003, Electronic Gaming Machine Standards and Minimum Operating Standards (MOS), to ensure the integrity and compliance of its EGM activities.

In particular, the audit targeted the following areas:

- * Return to player analysis,
- * Jackpot incrementing/discrepancies,
- * Linked jackpots,
- * Redistribution of jackpot funds,
- * Storage, faults and disposal of EGM's,
- * Surveillance review,
- * Physical EGM checks.

The audit found that Christchurch Casino is fulfilling its requirements for ensuring technical compliance and player fairness of its EGM operation through its implemented procedures and processes.

Please contact me on (03) 339 5513 should you wish to discuss anything regarding the audit.

Yours sincerely

Pete Collins

Senior Gambling Inspector
Southern Casino Compliance

Pete.collins@dia.govt.nz

(03) 339-5513 or 027 836-3995

CC: Tim Bergin – Risk and Compliance Manager



Regulatory Services
Casino Compliance, Southern
BNZ Centre, Level 1
120 Hereford Street
P O Box 1308, Christchurch 8011
Freephone 0800 257 887
Fax +64 3 339 5492
Website www.dia.govt.nz

29 August 2017

Mr. Brett Anderson
Chief Executive
Christchurch Casino
30 Victoria Street
CHRISTCHURCH 8140

Dear Brett,

Surveillance Audit at Christchurch Casino — May 2017

A Surveillance audit was undertaken to ensure that the Christchurch Casino's Surveillance operation complies with the Surveillance Standards and applicable Minimum Operating Standards.

The audit covered the following areas:

- Surveillance Standards Requirements and MOS,
- Camera coverage,
- Surveillance Department reporting and records,
- Access to Surveillance facilities for DIA,
- Equipment checks and maintenance schedules,
- Independent checks/pro-active monitoring by Surveillance,
- Personnel training levels,
- Disaster Recovery procedures.

The audit found the Christchurch Casino's Surveillance systems, activities and processes work effectively in accordance with the Surveillance Standard and applicable Minimum Operating Standards.

Please contact me on (03) 339 5516 should you wish to discuss anything regarding the audit.

Yours sincerely

Yours sincerely

G. Clark

Greg Clark
Senior Gambling Inspector
Casino Compliance Unit
Department of Internal Affairs

cc. Tim Bergin – Risk & Compliance Manager,

Regulatory Services
Casino Compliance, Southern
BNZ Centre, Level 1
120 Hereford Street
P O Box 1308, Christchurch 8011
Freephone 0800 257 887
Fax +64 3 339 5492
Website www.dia.govt.nz

09 October 2017

Mr. Brett Anderson
Chief Executive
Christchurch Casino
30 Victoria Street
CHRISTCHURCH 8140

Dear Brett,

Table Games Department Audit at Christchurch Casino – May 2017

The Department of Internal Affairs Casino Compliance Unit conducted an audit of the Table Games Department at Christchurch Casino during the month of May 2017.

The audit was conducted following the introduction of the new Minimum Operating Standards (MOS) in August 2016.

The audit covered the following areas:

- The adherence to the Gazetted Game Rules to ensure the integrity of gaming
- Staff performance issues and errors, in relation to the operation of Table Games, are identified and appropriately addressed
- Surveillance monitoring and review processes are effective regarding staff performance and the integrity and fairness of gambling
- That effective procedures are in place regarding the secure storage, handling and monitoring of sensitive Table Games equipment.
- There are appropriate supervision levels deployed to support adherence to Gazetted Game Rules
- There are established proactive and responsive processes in place for the maintenance and performance of Table Games equipment
- Training records are current and available

- There are measures that provide assurance that Table Games Department staff were trained and rostered appropriate to their role.

The audit showed that Christchurch Casino have systems and processes to address the identified areas of risk associated with Table Games. The audit observed good practice in the following areas:

- There was a range of effective procedures regarding the monitoring, handling and secured storage of sensitive Table Games equipment.
- Procedures are in place to provide assurance around the integrity of gaming equipment
- Surveillance review feedback processes provide detailed information to the Table Games Department identifying staff procedural errors relating to Gazetted Game Rules and MOS.

Overall, the audit found that Christchurch Casino had integrated procedures in place to meet Minimum Operating Standards and adherence to Gazetted Game Rules to ensure the integrity of table games.

The audit notes that Christchurch Casino has recently implemented 'PitCam' for the benefit of Gaming management. The Department will monitor the effectiveness of PitCam.

Please contact me on 339 5516 if you wish to discuss any of the matters covered in the audit.

Sincerely



Greg Clark

Senior Gambling Inspector

Casino Compliance Operations

Christchurch



**Te Tari Taiwhenua
Internal Affairs**

29 November 2017

Mr. Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
Christchurch 8140

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Dear Brett,

Table Games Audit – November 2017

The Southern Casino Compliance Unit completed an audit of the Table Games Department at Christchurch Casino in November 2017.

The audit covered the following areas:

- There are measures that provide assurance that Table Games staff are appropriately trained for their rostered duties.
- Training records are current and available.
- Adherence to the Gazetted Game Rules to ensure the integrity of gaming.
- Staff performance issues and errors in relation to the operation of Table Games are identified and addressed appropriately.
- Surveillance monitoring and review processes are effective regarding staff performance and the integrity and fairness of gambling.
- Effective procedures are in place regarding the secure storage, handling and monitoring of sensitive Table Games equipment.

The audit found that Christchurch Casino is conducting their table games in accordance with the Gambling Act 2003, the Gazetted Game Rules and the Minimum Operating Standards.

Please contact me on (03) 339-5513 should you wish to discuss anything regarding the audit.

Yours sincerely

Pete Collins
Senior Gambling Inspector
Southern Casino Compliance
Pete.collins@dia.govt.nz
(03) 339-5513

cc Tim Bergin
Risk and Compliance Manager



23 June 2017

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Mr Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
CHRISTCHURCH 8140

Dear Brett

Issues from May 2017

I would like to confirm that the following matters arose occurred during the month of May 2017, and has been noted in our reports.

Investigations

During May the following incidents have been investigated:

- There were seven breaches of exclusion orders resulting in DIA warning letters being issued in six of the cases. One particular case lacked any contact details which prevented a warning letter being sent.
- Seven expired excluded patrons who had failed to complete their re-entry criteria were located inside the Casino.
- There were two thefts in the gaming area which consisted of:
 - A patron cashed out \$54 worth of credits when an EGM was left unattended for a short period of time by another patron. Monies were recovered and the offender was warned.
 - A patron removed an iPhone and tobacco from an unattended handbag. Trespassed for two years.

Other Issues

- An unknown patron removed \$100 worth of chips belonging to another patron when left on BJ04. Chips retrieved and return to owner.

- A male patron gave his passport to his friend to use when entering the Casino, even though the friend was of legal age. Both males were trespassed for one year.

There were no other issues from May requiring comment.

If you should require further information, please do not hesitate to contact me.

Yours sincerely

G. Clark.

Greg Clark

Senior Gambling Inspector

Southern Casino Compliance

greg.clark@dia.govt.nz

(03) 339-5516 or 027 247 8797

CC: Tim Bergin – Risk and Compliance Manager



05 July 2017

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Mr Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
Christchurch 8140

Dear Brett

Issues from June 2017

I would like to confirm that the following occurred during the period 1st of June 2017 and the 30th of June 2017, and has been noted in our reports to the Director, Gambling Compliance.

Investigations

During the period the following incidents have been investigated:

- There were eight breach of exclusion orders reported, resulting in six warning letters and one Infringement Notice being issued. No further action could be taken in one instance as the patron refused to supply any contact details.
- There were five thefts in the gaming area reported, consisting of:
 - A hand pay for \$509 which was issued for a second time after not being keyed off correctly. The offender left immediately after cashing the hand pay. To be followed up when next on site.
 - Theft of a cell phone that had been dropped. The cell phone has been returned and the offender warned.
 - Theft of pouch containing keys and credit card, dropped by an employee. Offender has not been identified.
 - A freshly poured pint of beer taken from a table in the Valley Bar. The offender was identified, paid for the beer and requested to leave.
 - A baccarat player took ownership of \$32.50 in chips belonging to another player. Money recovered and offender warned.
- There were seven expired excluded patrons who had failed to complete their re-entry criteria located in the Casino during the month. These patrons have all been excluded again for varying periods of time.

- There were two incidents involving children left in vehicles in the vicinity of the Casino, consisting of:
 - One involved a child left with an adult in the internal car park while the mother gambled. Mother was spoken to and asked to leave.
 - The second involved a child left in a vehicle outside the Main Entrance while the mother purchased some vouchers at the Players Desk. The matter was followed up by the Host Responsibility Executive.

Other Issues

During the month we received a complaint from a patron who breached his trespass and was re-trespassed as a result. The complaint related to his original trespass from two years ago, which he claimed was unfair. Once spoken to the patron withdrew his complaint stating that it was a long time ago and he just wanted to move on.

We also received a request from a patron to review footage after his wife was hit by another patron. The footage showed a male patron was expressing something, using his arms. During this he struck a female patron on the side of her face. The review confirmed this was totally accidental, as was explained to the 'victim' at the time.

There were no other issues from June requiring comment. If you should require further information, please do not hesitate to contact me.

Yours sincerely



Pete Collins

Senior Gambling Inspector

Southern Casino Compliance

Pete.collins@dia.govt.nz

(03) 339-5513 or 027 836-3995

CC: Tim Bergin – Risk and Compliance Manager

08 August 2017

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Mr Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
CHRISTCHURCH 8140

Dear Brett

Issues from July 2017

I would like to confirm that the following occurred during the period 1st of July and the 31st of July 2017, and has been noted in our reports.

Investigations

During the period the following incidents have been investigated:

- There were six breaches of exclusion orders reported for the month resulting in five DIA warning letters and one Infringement Notice being issued.
- There were seven expired excluded patrons who had failed to complete their re-entry criteria located inside the Casino during the month.
- There were two thefts in the gaming area which consisted of:
 - An unknown female patron removed a jacket belonging to another patron from the back of a chair inside the EGM area.
 - A patron picked up a \$100 note from the floor which did not belong to him. Money retrieved and patron warned.

Other Issues

- There was one instance relating to an underage not participating in gaming. A female entered the Casino unchallenged but shortly later was approached by Security in the Valley Bar where it was established she was underage. She was then escorted from the premises. The underage female was issued with a DIA Warning.

- A mother who left her child unattended in her parked car outside the Casino while she collected her promotional tickets at Players Club. No gaming activity took place. The matter was dealt with by both the Host Responsibility Executive and Security. Furthermore, the DIA made direct contact with the mother.
- A current TAB excluded person was found on site and subsequently casino-excluded for two years.
- A male produced another person's ID (a Drivers Licence) when entering the Casino even though he was of age, not trespassed or excluded. Trespassed for a three month period.

There were no other issues from July requiring comment.

If you should require further information, please do not hesitate to contact me.

Yours sincerely

G. Clark.

Greg Clark
Senior Gambling Inspector
Southern Casino Compliance
greg.clark@dia.govt.nz
(03) 339-5516 or 027 247 8797

CC: Tim Bergin – Risk and Compliance Manager



06 September 2017

Mr Brett Anderson
Chief Executive
Christchurch Casino
PO Box 4141
Christchurch 8140

Regulatory Services
Casino Gambling Compliance
Level 1, BNZ Centre, 120 Hereford Street
P O Box 1308, Christchurch
Freephone 0800 257 887
Website www.dia.govt.nz

Dear Brett

Issues from August 2017

I would like to confirm that the following occurred during the period 1st of August 2017 and the 31st of August 2017, and has been noted in our reports to the Director, Gambling Compliance.

Investigations

During the period the following incidents have been investigated:

- There were two breach of exclusion orders reported, resulting in one warning letter and one Infringement Notice being issued.
- There was one theft in the gaming area reported where a patron left credits on a reserved machine. The offender inserted his Players Club card before checking or downloading some points. He then played a few spins before cashing out \$26. The money recovered and returned to the complainant and offender warned.
- There were four expired excluded patrons who had failed to complete their re-entry criteria located in the Casino during the month. These patrons have all been excluded again for varying periods of time.
- There was one incident involving two children under ten years of age left in a car in the external car park for ten minutes while both parents collected their redemption gifts. No gambling was involved. The Host Responsibility Executive spoke to the parents and they were warned.

Other Issues

Of recent times there have been more and more Game Designs coming through with very little notice before the promotion starts. I accept that a number of these are free to enter, but some of them are not. It is not unusual for a Game Design to be forwarded to us in the morning and the promotion starts in the afternoon. It has always been accepted that three

days clear notice will be given before a promotion commences and it would be good to see this criteria applied to all Game Designs.

Further to that it is not now unusual for us to receive a Game Design and then within a few hours receive an amended version.

The vast majority of the Game Designs relate to specific events, such as rugby games or shows, where the dates of the events are known well in advance.

It concerns me that there is a trend creeping in where the Game Designs are a very late, spur of the moment promotion, which could have been planned well in advance. It also seems that this approach is resulting in a rushed Game Design which lacks the necessary accuracy and checking.

There were no other issues from August requiring comment. If you should require further information, please do not hesitate to contact me.

Yours sincerely



Pete Collins
Senior Gambling Inspector
Southern Casino Compliance
Pete.collins@dia.govt.nz
(03) 339-5513 or 027 836-3995

CC: Tim Bergin – Risk and Compliance Manager

Appendix 14.7 – Casino Surveillance Standards and Minimum Operating Standards



Minimum operating standards for casinos

Foreword

This document contains minimum operating standards for New Zealand casinos issued in accordance with section 141 of the Gambling Act 2003 (the Act).

The purposes of the Act are to control the growth of gambling, prevent and minimise gambling harm, facilitate responsible gambling, ensure the fairness and integrity of gambling and limit opportunities for crime or dishonesty.

The regulatory framework for casinos was designed to establish integrity in the casino environment at a time when casino gambling was a relatively new industry in New Zealand. The Casino industry has matured significantly since it was established. Many compliance responsibilities and standards of integrity are an intrinsic part of the operating environment. In some instances compliance responsibilities and standards of integrity provide a benefit for the operator, in terms of its reputation and the goodwill of its patrons. Casinos face their own set of risks if they are known to be non-compliant. In addition, technology has introduced enhanced monitoring of casino gambling and the ability of casinos to detect and prevent dishonesty and opportunities for criminal behaviour.

Casinos are governed by a matrix of regulatory instruments including the minimum operating standards. The minimum operating standards do not provide a comprehensive set of all the operating rules for casinos but operate in conjunction with Gambling Commission policies and licence conditions, rules of casino games, minimum technical requirements and the Act itself.

The Department of Internal Affairs, as a responsive, risk-based regulator has developed these minimum operating standards with the above background in mind. The standards are based on the following principles:

- The minimum operating standards are consistent with the purposes of the Act and with Gambling Commission policies and licence conditions.
- The minimum operating standards complement other regulatory instruments that govern the operation of casinos and do not repeat standards or requirements that are contained in those instruments.
- The minimum operating standards provide high-level outcomes that casinos must achieve. Casino operators have the discretion to develop their own procedures to meet the outcomes as they are in the best position to determine appropriate business practices for their particular circumstances.
- The minimum operating standards support gambling integrity and harm minimisation.

As these minimum operating standards are one of a number of regulatory instruments governing casinos, the absence of standards for a particular aspect of casino operation does not mean that this area is unregulated or unimportant to the Department. For example, there are very few references to harm minimisation in the standards because harm minimisation is covered extensively in other regulatory instruments including detailed host responsibility policies approved for each casino by the Gambling Commission, and minimum technical requirements for casino electronic gaming machines and monitoring systems. Harm minimisation is an area of significant focus for the Department and will continue to be so under its casino operating model.

Gambling Act 2003

Minimum Operating Standards for Casinos

Contents

FOREWORD	2
Part 1 – Preliminary	6
Commencement	6
Application.....	6
Interpretation	6
Part 2 – Records and Notifications	9
Contacting Gambling Inspectors	9
Right of first interview	9
Patron complaints and requests to see a Gambling Inspector.....	9
Limits on disclosure	9
Harm minimisation	10
Daily gaming activity and revenue.....	10
Statistics.....	10
Part 3 – Personnel	12
Certificate of approval holders	12
Separation of duties and responsibilities	12
Delegations.....	13
Training.....	13
Dual rate or higher duties certificate of approval holders	13
Part 4 – Security	14
Access control.....	14
Key control.....	14
Admission to casino.....	15
Visitors and contractors.....	15
Loss of CCTV	15
Power failure	15
Counterfeit funds	15
Suspected undesirable activity	16
Part 5 – Surveillance	17
Cages, chip banks and count rooms	17
Closed circuit television systems	17
Part 6 – Cash	18
Security of funds.....	18
Main bank.....	18
Chip Purchase Vouchers	18
Gaming machine payouts	18
Unclaimed cash	18

Part 7 – Design and manufacture of chips	20
Chips approved by Casino Control Authority	20
Authorisation and approval.....	20
Chip specification	20
Design specifications	20
Part 8 – Storage and use of chips.....	22
Chip security	22
Inventory	22
Use of chips in other casinos	22
Receipt from manufacturer	22
Damaged chips	22
Destruction of chips.....	22
Chip fills and credits	23
Unclaimed chips or bets	23
Part 9 – Sensitive Gambling equipment.....	24
Inventory	24
Purchase and receipt	24
Storage and security of sensitive gambling equipment	24
Card storage	24
Integrity and inspection of sensitive gambling equipment for table games	24
Integrity and inspection of sensitive gambling equipment for gaming machines and electronic table games	25
Decommissioned sensitive gambling equipment	25
Destruction of sensitive gambling equipment.....	25
Part 10 – Conduct of games.....	26
Table float.....	26
Opening and closing table games.....	26
Supervision	26
Treatment of underpayments and overpayments	26
Minimum & maximum limits.....	26
Reconciliation of jackpots.....	27
Decommissioned jackpots.....	27
Part 11 – Group commission programmes.....	28
Part 12 – Special provisions relating to SkyCity Auckland Casino.....	29
Appendix One – Table of notification requirements contained in the minimum operating standards.....	30

Part 1 – Preliminary

Commencement

- 1 These minimum operating standards—
 - (a) Are specified by the Secretary pursuant to section 141 (1)(e) of the Gambling Act 2003
 - (b) Come into force on 1 August 2016
 - (c) Revoke and replace all Minimum Operating Standards previously specified under section 141 of the Gambling Act 2003, or deemed from 1 July 2004 to be Minimum Operating Standards, and subsequently amended.

Application

- 2 These minimum operating standards apply to and are in relation to the operation of the following casinos by the following casino operators:

Casino	Operator
Christchurch Casino	Christchurch Casinos Limited
Dunedin Casino	Dunedin Casinos Management Limited
SKYCITY Auckland Casino	Sky City Casino Management Limited
SKYCITY Hamilton Casino	Sky City Casino Management Limited
SKYCITY Queenstown Casino	Sky City Casino Management Limited
SKYCITY Wharf Casino	Sky City Casino Management Limited

Interpretation

- 3 In these minimum operating standards, unless the context otherwise requires—
 - (a) Words and expressions used that are defined in the Gambling Act 2003 have the same meaning as in the Act
 - (b) An Act includes the amendments to the Act for the time being in force, and also any Act passed in substitution for or in lieu of that Act, and the rules, regulations and by-laws for the time being in force under any such Act
 - (c) A reference to a function includes a reference to a power, an authority and a duty; and
 - (d) The exercise of a function includes, where the function is a duty, a reference to the performance of the duty
 - (e) A reference to a paragraph or sub-paragraph refers to a paragraph or sub-paragraph of this minimum operating standard unless otherwise stated
 - (f) The singular includes the plural and vice versa.
- 4 The following words and expressions have the following meanings—
 - (a) **Act** means the Gambling Act 2003

- (b) **As soon as practicable** means at the earliest opportunity
- (c) **Casino operator** means a person or class of persons licensed under section 130 of the Act to conduct casino gambling pursuant to section 119 of the Act
- (d) **Certificate of approval holder** means a person employed in a casino who holds a certificate of approval issued by the Secretary under section 163 of the Act
- (e) **Chip** has the same meaning as in section 4 of the Act and, for the avoidance of doubt, includes but is not limited to, a token or ticket for use in a gaming machine, a plaque, and any other item that may be used instead of money in casino gambling
- (f) **Chip bank** means the area designated for housing the chips required for daily casino operations
- (g) **Chip credit** means a transaction whereby a supply of chips and/or funds is transferred from a gaming table to the chip bank
- (h) **Chip fill** means a transaction whereby a supply of chips and/or funds is transferred from the chip bank to a gaming table
- (i) **Chip purchase voucher** means a document that is issued to a patron who can redeem the document in exchange for cash or chips and includes a chip sales voucher
- (j) **Count room** means a purpose built, secure room where cash from gaming machines and/or table games is counted and recorded
- (k) **Document** means to record information about or evidence of something by means of written, printed, electronic or digital material
- (l) **Dual rate** means a person who has the authority to act in the capacity of the employee in a position above their usual position
- (m) **Employ** includes, in relation to a natural person, to engage under a contract for services, and **employed** has a corresponding meaning
- (n) **Float** means the table inventory, which comprises chips and funds, kept in a lockable container secured to the gaming table
- (o) **Funds** means cash, chips, tokens, tickets and/or cash equivalents taken as a whole or in part
- (p) **Gambling Inspector** means a person who is appointed as an inspector under section 330 of the Act
- (q) **Gaming day** means the 24-hour period established for the recording of casino related transactions
- (r) **Gaming-related system** means an electronic system used directly or remotely to conduct, monitor or manage casino gambling
- (s) **Loan-sharking** means the provision of loans within the casino by any person for financial gain. For the avoidance of doubt, this does not include the provision of credit by casino operators in accordance with any credit policy approved by the Gambling Commission under section 15(4) of the Act.
- (t) **Main bank** means the central distribution area for the working and reserve supply of cash held for the daily operation of the casino
- (u) **Pit** means the area or areas within the casino in which certificate of approval holders administer and supervise table games played by patrons
- (v) **Secretary** means the Secretary for Internal Affairs
- (w) **Sensitive gambling equipment** in relation to gaming machines, automated table games and electronic table games means any software or gaming-related system that impacts on or controls the operation of gaming machines or electronic table games, including any portable hardware that contains the software (e.g. portable storage devices, jackpot controllers).

- (x) **Sensitive Gambling Equipment in relation to table games** means any unattached gambling equipment used in the play of table games such as cards, dice, tiles, and roulette balls.
- (y) **Surveillance Department** means the department within the casino operator's organisation that is responsible for the oversight of gambling and gambling-related activities, and the operation and monitoring of surveillance equipment
- (z) **Table inventory slip** means a document showing the number and value of each denomination in a float, the total value of the float and the table number
- (aa) **Transaction** means any deposit, withdrawal, exchange, or transfer of funds, including gaming machine or table game payouts
- (bb) **Unclaimed cash** means cash that is found in the gambling area or its immediate vicinity

Part 2 – Records and Notifications

Contacting Gambling Inspectors

- 5 Where a minimum operating standard requires that a Gambling Inspector be notified immediately of an event or incident, the first contact should be by telephone to the number provided by the inspectorate.
- 6 Where a minimum operating standard requires that a Gambling Inspector be notified as soon as practicable, the first contact may be by telephone to the designated number provided by the Department or any other method of communication agreed with the Department.
- 7 If it is not possible to contact a Gambling Inspector as required, the person who is required to provide notification will be deemed to have done if he or she leaves a message on the designated telephone giving the nature and time of the incident.

Right of first interview

- 8 Gambling Inspectors reserve the right to conduct a formal interview in the first instance where there is reasonable cause to suspect that an offence against the Act has occurred, or it is determined that an incident of suspected cheating requires a formal interview of a suspect.
- 9 If it is not possible to contact a Gambling Inspector for the purpose of conducting a formal interview of suspects the casino operator may undertake any investigations deemed necessary to determine whether or not an offence against the Act has occurred. The casino operator must provide a report to a Gambling Inspector on any interview and/or investigation as soon as practicable.

Patron complaints and requests to see a Gambling Inspector

- 10 If a casino employee who is not a certificate of approval holder receives a request from a patron to see a Gambling Inspector he or she must refer the patron to a certificate of approval holder.
- 11 If a dispute relating to the conduct of gambling is unresolved, casino operators must advise complainants of their right to make a complaint to a Gambling Inspector.
- 12 If a complainant wishes to pursue a matter with a Gambling Inspector, or any patron requests to see a Gambling Inspector, the casino operator must—
 - (a) If the patron consents, contact a Gambling Inspector and give details of the request or complaint immediately; or
 - (b) Otherwise, advise the patron how he or she can contact a Gambling Inspector.

Limits on disclosure

- 13 Nothing in this Minimum Operating Standard requires a casino operator to disclose information—
 - (a) That is subject to legal professional privilege
 - (b) Where disclosure would constitute a breach of any other legislation
 - (c) Where a law enforcement or prosecutorial body having jurisdiction in the matter considers that such disclosure may prejudice the investigation or prosecution of an offence.

Harm minimisation

- 14 Casino operators must—
- (a) Maintain current records of every person issued with an exclusion order under any of sections 309 or 310 of the Act, including any conditions of re-entry imposed in accordance with regulations made under section 316(1)(e) of the Act
 - (b) Where possible, maintain records of every person required by the operator to leave the casino venue under section 307 of the Act
 - (c) Make the records available to a Gambling Inspector on request.
- 15 Casino operators must notify a Gambling Inspector as soon as practicable after becoming aware of any activity taking place in relation to the casino that the operator has reasonable cause to suspect may constitute an offence against sections 303 or 312(1) of the Act.

Daily gaming activity and revenue

- 16 Casino operators must maintain information about gaming activity and revenue for each gaming day in such a way that information about a specified period can be made available to a Gambling Inspector on request.

Statistics

- 17 Casino operators must provide to a Gambling Inspector a monthly statistical report containing the following:
- (a) The number of people under 20 found participating in casino gambling in contravention of section 303(1)(a) of the Act
 - (b) The number of people under 20 found in the gambling area of the casino in contravention of section 303(1)(b) of the Act
 - (c) Any instances where operators have refused to pay money or prizes to persons under 20 under section 305 of the Act
 - (d) The number of people required to leave the casino premises pursuant to section 307 of the Act
 - (e) The number of people that returned to the gambling area of the casino in breach of conditions or requirements imposed by the casino operators
 - (f) The number of actual or potential problem gamblers identified pursuant to section 308(4) of the Act
 - (g) The number of exclusion orders issued pursuant to section 309(3) of the Act
 - (h) The number of exclusion orders issued pursuant to section 310(1) of the Act
 - (i) The number of people who entered the gambling area of the casino in breach of any exclusion order issued under sections 309(3) or 310(1) of the Act, or any condition of re-entry imposed under sections 309(4) or 310(2) of the Act
 - (j) The number of cheating offences under section 351 of the Act
 - (k) The number of people found to be in possession of equipment for cheating under section 352 of the Act
 - (l) The number of counterfeit chips found in the gambling area of the casino, and the number of persons found in the gambling area of the casino knowingly in possession of counterfeit chips.
- 18 Casino operators must maintain statistical records of the following information and make the information available to a Gambling Inspector on request:
- (a) The number of instances where suspected counterfeit notes were presented

- (b) The number of assaults committed in the gambling area of the casino
- (c) The number of theft offences committed in the gambling area of the casino
- (d) The number of drug offences committed in the gambling area of the casino
- (e) The number of instances of begging in the gambling area of the casino
- (f) The number of people trespassed or required to leave the casino for making loans for financial gain
- (g) The number of instances of children found by casino employees to have been left unattended while their parents or guardians are, or have been, gambling in the casino
- (h) Any other offences committed in the gambling area of the casino.

Part 3 – Personnel

Certificate of approval holders

- 19 Casino operators must keep, or ensure the relevant employer keeps, a record of all certificate of approval holders employed in the casino. That record must include—
- (a) The employee’s full name
 - (b) Whether the employee is a dual rate employee
 - (c) The employee’s job title (or titles in the case of dual rate employees)
 - (d) A record of any training courses that the Act or the minimum operating standards requires the employee to complete, and the date on which those courses were completed
 - (e) Details of any previous employment as a certificate of approval holder in another New Zealand casino
 - (f) Any information that could relate to the matters set out in section 167 of the Act (which sets out the grounds for suspending or cancelling a certificate of approval).
- 20 Casino operators or relevant employers must retain the record until 7 years after the date on which the employee ceased to be employed as a certificate of approval holder.
- 21 Casino operators must provide a monthly report to a Gambling Inspector containing details of any certificate of approval holder who has—
- (a) Commenced employment in the casino
 - (b) Ended their employment in the casino
 - (c) Transferred to another casino (if the casino operator is aware of this).
- 22 If a casino operator becomes aware of information concerning a certificate of approval holder employed in the casino, and the operator has reason to believe the information relates to any of the grounds set out in section 167 of the Act, the operator must report it to a Gambling Inspector as soon as practicable after becoming aware of the information.
- 23 Matters that must be reported under paragraph 22 include—
- (a) Any investigation undertaken by the operator into the conduct of the employee, the employee’s financial position, or other investigation where the investigation has established a reasonable cause to suspect dishonesty or a breach of the Act
 - (b) Any formal disciplinary action or dismissal of the employee for dishonest conduct or in relation to a contravention of the Act, and the grounds supporting such action
 - (c) Any formal disciplinary action or dismissal of the employee for failure or refusal to comply with the casino operator’s requirements of staff in relation to host responsibility and or/problem gambler identification policies
 - (d) Any resignation tendered by the employee to avoid the possibility of dismissal for dishonest conduct or in relation to a contravention of the Act
 - (e) Pending criminal proceedings
 - (f) Any conviction for any offence relating to dishonest conduct, or offence against the Act
 - (g) Conduct that might otherwise reflect on the employee’s suitability to be employed in a casino including, but not limited to, assault or drug dealing.

Separation of duties and responsibilities

- 24 Casino operators must ensure that their organisation structures and reporting lines provide for the separation of duties and responsibilities, supervisory oversight, and accountability.

- 25 Casino operators must ensure that there is sufficient separation of duties to ensure that no person completes more than one signatory phase of a single transaction.

Delegations

- 26 Casino operators must maintain current lists of delegations and authorisation levels, including but not limited to authorisation levels for—
- (a) Approval of transaction limits
 - (b) Access to secure areas and/or items.
- 27 Authorisation levels must specify—
- (a) The specific activity the authorisation relates to; and
 - (b) The role or job title of the person entitled to perform the activity.
- 28 Casino operators must make current lists of delegations and authorisation levels available to a Gambling Inspector on request.

Training

- 29 All certificate of approval holders must complete a course of training as soon as practicable following their employment. The training must cover all requirements of legislation, licence conditions, operating standards and procedures applicable to the person's role.
- 30 Certificate of approval holders may work in more than one department provided they have completed the relevant training courses and do not complete more than one signatory phase of a single transaction.
- 31 Casino operators must keep a record of the training completed by each certificate of approval holder.

Dual rate or higher duties certificate of approval holders

- 32 Casino operators may appoint appropriately trained certificate of approval holders to dual rate positions.
- 33 Dual rate certificate of approval holders may assume the duties, responsibilities and authorisation levels of a position that is senior to their regular position, but must not complete more than one signatory phase of a single transaction.

Part 4 – Security

Access control

- 34 Casino operators must ensure that access to the following areas is limited to certificate of approval holders with specific functions to perform in the area unless access is otherwise authorised by a managerial certificate of approval holder:
- (a) Main bank
 - (b) Chip bank and any other chip storage areas
 - (c) Count room(s)
 - (d) Cashiering locations
 - (e) Gaming pits
 - (f) Maintenance and/or storage areas for gambling
 - (g) Surveillance monitoring room.
- 35 Access to the areas in paragraph 34 for persons who are not certificate of approval holders must be—
- (a) Authorised by an appropriate certificate of approval holder; and
 - (b) Supervised as the casino operator, after consultation with the surveillance department, thinks appropriate.
- 36 Notwithstanding the above—
- (a) Gambling Inspectors are permitted unrestricted and immediate access to the areas listed in paragraph 34
 - (b) Gambling Commissioners are permitted unrestricted access to the areas listed in paragraph 34. Such access must be arranged on request and without delay.
- 37 Casino operators must control and limit access to components of EGMs or IT systems that control or impact on the integrity of games to ensure the integrity of gambling.
- 38 Casino operators must control and limit access to holders for chips and funds (for example drop boxes, coin hoppers) to ensure the security of chips and funds.

Key control

- 39 Where access to areas or items specified in paragraphs 34 – 38 is controlled by keys and/or swipe cards (other than swipe cards that are issued to an individual staff member and are held and used only by that staff member) casino operators must—
- (a) Ensure that such keys and swipe cards are stored securely
 - (b) Have procedures in place to monitor and record the issue and return of the keys and/or swipe cards

Admission to casino

- 40 Casino operators must ensure that they have procedures in place to ensure that persons who are prohibited by the Gambling Act from entering the gambling area do not do so.

Visitors and contractors

- 41 Contractors performing functions that would normally fall within section 158(2)(e) & (f) of the Act must hold a certificate of approval unless the contractor performs such functions on fewer than 15 days in any calendar year.
- 42 A contractor who is not a certificate of approval holder must be accompanied by a Security employee or be under CCTV coverage when working with sensitive gambling equipment.

Loss of CCTV

- 43 If CCTV coverage is lost casino operators must suspend the following activities until either CCTV coverage is resumed or appropriately trained Surveillance, Security or supervisory personnel, who are certificate of approval holders, can provide dedicated physical supervision and oversight of the activity:
- (a) Cashiering activity including counts
 - (b) Table game play and activity.
- 44 Electronic gaming machine play and automated table game play can continue provided the electronic monitoring system is fully functional.
- 45 For the avoidance of doubt, paragraph 43 applies only to the particular areas where CCTV coverage has been lost.

Power failure

- 46 Casinos must have emergency power systems to maintain critical lighting and services in the event of an interruption to the main power supply.
- 47 In the event of a power failure and until emergency power is available the following provisions apply in the area affected by the power failure:
- (a) All gambling must cease
 - (b) Bets must remain on tables and no chips are to be issued or transferred
 - (c) All cashiering activity must cease
 - (d) All funds and associated paperwork must be secured.
- 48 Security personnel or supervisory staff who are Certificate of Approval holders must be stationed in the following areas, if those areas are affected by the power failure, to ensure the security of funds, wagers and associated paperwork:
- (a) At each cashiering cage that is available to the public
 - (b) Within each pit area.

Counterfeit funds

- 49 If a patron is suspected of presenting counterfeit or suspected counterfeit money, or chips are discovered casino operators must—
- (a) Secure the suspected counterfeit funds
 - (b) Notify the Surveillance Department immediately and retain any relevant footage
 - (c) Notify the Police immediately

- (d) Notify a Gambling Inspector immediately.

Suspected undesirable activity

Cheating

- 50 Casino operators must ensure that any incident involving a breach of the game rules that led or might have led to some pecuniary advantage to any person is reported to the Surveillance Department as soon as practicable after the breach occurs.
- 51 The Surveillance Department must review any relevant footage in order to determine whether there is reasonable cause to suspect that an offence against the Act has occurred.
- 52 If the operator determines that the incident requires further investigation or action of any sort, the operator must notify a Gambling Inspector as soon as practicable of the further action being considered by the operator.

Other offences

- 53 Casino operators must, immediately after becoming aware of the activity, notify a Gambling Inspector of any activity taking place in or in relation to the casino that—
 - (a) They have reasonable cause to suspect may constitute an offence against sections 348, 352 or 353 of the Act; or
 - (b) They have reasonable cause to suspect may constitute a crime of dishonesty that involves or relates to gambling; or
 - (c) Could otherwise compromise the honesty or integrity of gambling in the casino.
- 54 If casino operators become aware of any other suspected criminal activity on the casino premises, that is not already referred to in this minimum operating standard, they must—
 - (a) Record that activity, including details of any notification to the Police and any other action taken in response to the activity; and
 - (b) Provide a copy of the record to a Gambling Inspector as soon as practicable.

Part 5 – Surveillance

Cages, chip banks and count rooms

- 55 Casino operators must have procedures in place to ensure that activities and transactions in the cage, chip banks and cage booths, and activities in the count rooms are carried out in such a way that surveillance footage can be used to—
- (a) Identify each employee's actions
 - (b) Identify all records and funds
 - (c) Identify the results from any automated counting or weighing device associated with the count, including mobile counting devices; and
 - (d) Accurately review transactions.

Closed circuit television systems

- 56 Casino operators must make available to Gambling Inspectors a current camera layout of the casino's closed circuit television system.
- 57 Casino operators must, as soon as practicable, notify a Gambling Inspector of any changes to the camera layout of the closed circuit television system within the casino's gambling area. If the changes are to be permanent the casino operator must make available an updated layout of the system.
- 58 If the changes are temporary, the casino operator must advise the Gambling Inspector of the duration of the changes and, if the duration is greater than 48 hours, make available an updated layout of the system on request.
- 59 Casino operators must, as soon as practicable, notify a Gambling Inspector of any event that results in the loss of effective closed circuit television coverage in the areas in which coverage is required by the Gambling Commission's surveillance standard.

Part 6 – Cash

Security of funds

- 60 Casino operators must ensure that —
- (a) All funds are securely transported and held
 - (b) Procedures are in place to limit opportunities for theft, fraud or other dishonesty
 - (c) The procedures are made available to a Gambling Inspector on request.

Main bank

- 61 Casino operators must have policies and procedures in place to ensure that—
- (a) All transactions involving the movement of funds to or from the main bank are supported by documentation
 - (b) The main bank inventory is counted and reconciled at least once every gaming day
 - (c) Suspicious variances are investigated and unresolved variances are recorded.
- 62 Casino operators must notify a Gambling Inspector as soon as practicable of any variance that the operator considers to be suspicious.

Chip Purchase Vouchers

- 63 A chip purchase voucher must comprise a complete record of the transaction including the certificate of approval holders issuing and redeeming the voucher and the pit (where applicable) and table number.
- 64 When a chip purchase voucher is issued at a cash cage a certificate of approval holder must verify and document the patron's identity and, if applicable, verify the existence of funds on deposit before allowing the voucher to be issued.
- 65 When a chip purchase voucher is redeemed at a cash cage a certificate of approval holder must check the validity of the voucher and verify the patron's identity.

Gaming machine payouts

- 66 At least one certificate of approval holder must ensure that a gaming machine payout is valid before paying it out.
- 67 Casino operators must keep sufficient documentation to enable payouts to be verified and audited.

Unclaimed cash

- 68 Unclaimed cash must be delivered to a certificate of approval holder.
- 69 If the cash is less than \$20 it may be placed in the charity box or donated to the casino's charitable trust.
- 70 If the cash is \$20 or more the casino operator must —
- (a) Document the cash and the time and location that it was found, and
 - (b) Bank the cash.

- 71 If the cash is unclaimed after three months from the time it was found, the casino operator may return it to the finder or donate it to the casino's charitable trust at the casino operator's discretion. If the finder is an employee of the casino, the cash must be donated to the charitable trust.

Part 7 – Design and manufacture of chips

Chips approved by Casino Control Authority

- 72 Chips approved by the Casino Control Authority are deemed to be authorised chips until such time as a modification in the use or design of those chips is sought by a casino operator, in which case an application must be made to the Secretary in accordance with these standards.

Authorisation and approval

- 73 Any chips for use in casino gambling must be authorised by the Secretary.
- 74 Authorised chips may not be modified without the approval of the Secretary.
- 75 Applications to the Secretary for authorisation of chips or approval of modifications to authorised chips must include—
- (a) The name and address of the manufacturer of the chip
 - (b) Evidence either—
 - (i) That the manufacturer (in the case of tickets, the ticket validation unit manufacturer) has a system of internal controls that ensures the integrity and security of the design and manufacture process so as to mitigate the possibility of persons obtaining any equipment with the intent to manufacture a counterfeit chip; or
 - (ii) That the manufacturer is ISO 9001:2008 accredited.
 - (c) The intended use for the subject chip
 - (d) A detailed schematic drawing of the chip, or a sample of the chip; and
 - (e) Any other information that the Secretary may specify.

Chip specification

- 76 All chips and tokens for use on table games or in gaming machines in New Zealand casinos must at a minimum—
- (a) Be designed, manufactured and constructed so as to deter counterfeiting;
 - (b) Not resemble present or past coinage of any nation
- 77 All tickets for use in gaming machines, automated table games, electronic table games or table games in New Zealand casinos must be used in conjunction with a ticket validation system that ensures that the ticket may be redeemed or used only once.

Design specifications

- 78 In paragraph **Error! Reference source not found.** references to chips do not include gaming machine tokens or tickets.
- 79 All chips and plaques for use in New Zealand casinos—
- (a) Must be inscribed with the casino name and either the city or country in which the casino is located
 - (b) Must be clearly distinguishable from the table layout when viewed on surveillance cameras
 - (c) May be of any colour provided that each denomination is clearly distinguishable from every other denomination, and non-value chips are clearly distinguishable from each other, when viewed on surveillance cameras

- (d) Value chips must have edge pattern diversity such that each denomination is clearly distinguishable from every other denomination when viewed on surveillance cameras
 - (e) Non-value chips must have a design, insert or symbol that makes each type of non-value chip clearly distinguishable from other non-value chips used at other tables.
- 80 Tokens for use in gaming machines in New Zealand casinos—
- (a) Must be inscribed with the casino name and either the city or country in which the casino is located
 - (b) Must have the value of the token inscribed on both sides of the token.

Part 8 – Storage and use of chips

Chip security

81 Casino operators must securely transport and store chips.

Inventory

82 Casino operators must—

- (a) Maintain inventories for each chip storage area
- (b) Maintain a separate inventory of damaged or unusable chips
- (c) Document all transactions involving the movement of chips in or out of storage areas to allow reconciliation of the inventory
- (d) Regularly reconcile inventories for each area
- (e) Investigate any variances, maintain a record of any unresolved variances, and notify a Gambling Inspector as soon as practicable of any variance that is considered suspicious.

Use of chips in other casinos

83 Chips that have been approved for use in a New Zealand casino may be used in any other New Zealand casino with the agreement of both casino operators and notification to a Gambling Inspector.

84 Chips that have been acquired from a New Zealand casino by a patron may be redeemed at any other New Zealand casino with the agreement of both casino operators.

Receipt from manufacturer

85 When chips are received from the manufacturer they must be inspected for any defects or signs of tampering

86 If there is any evidence of tampering a Gambling Inspector must be notified as soon as practicable.

87 Any chips that are defective or do not meet quality standards must be either securely destroyed or returned to the manufacturer for secure destruction.

88 New chips must not go into circulation until they have been approved by the Department of Internal Affairs, and the Surveillance Department and a Gambling Inspector have confirmed that the chips meet surveillance requirements.

Damaged chips

89 Casino operators must withdraw from circulation any chips that are so damaged as to be unusable immediately the damage is discovered, and store them securely until they are destroyed.

Destruction of chips

90 Casino operators must ensure the thorough and complete destruction of all damaged or otherwise unusable chips.

91 The destruction of chips must be carried out in the presence of at least two certificate of approval holders, one of whom must be of supervisory level or above.

- 92 Casino operators must keep records of the destruction of chips including details of the chips destroyed and the certificate of approval holders present at the destruction.

Chip fills and credits

- 93 Casino operators must have systems in place for verifying chip fills and credits. Employees must immediately report any discrepancies to a supervisory certificate of approval holder and the Surveillance Department.
- 94 Where a discrepancy cannot be resolved, or suspicious activity is suspected, casino operators must notify a Gambling Inspector as soon as practicable.

Unclaimed chips or bets

- 95 Unclaimed chips must be delivered to a certificate of approval holder who must secure the chips and inform a supervisory certificate of approval holder or above.
- 96 Casino operators must take reasonable steps to establish the ownership of the chips.
- 97 Where ownership cannot be readily established casino operators must record sufficient details of the unclaimed chips to allow subsequent identification, and return the chips to the appropriate inventory.

Part 9 – Sensitive Gambling equipment

Inventory

- 98 Casino operators must maintain accurate, current inventories of all sensitive gambling equipment.
- 99 Casino operators must make inventories of gambling equipment available to a Gambling Inspector on request.

Purchase and receipt

- 100 When sensitive gambling equipment is received casino operators must inspect it for signs of tampering or damage.
- 101 If there is any evidence of tampering operators must secure the equipment and notify a Gambling Inspector as soon as practicable. The equipment must not be entered into the sensitive gambling equipment inventory or used for gambling.
- 102 If the equipment is damaged operators must not enter it into the sensitive gambling equipment inventory or use it for gambling.
- 103 Once sensitive gambling equipment has been inspected and found to be free from tampering or damage operators must record it in the relevant inventory and store it securely.

Storage and security of sensitive gambling equipment

- 104 Casino operators must securely store and transport sensitive gambling equipment.
- 105 Casino operators must ensure that damaged and/or decommissioned equipment is physically separated from new and operational equipment.

Card storage

- 106 Casino operators may store a supply of cards in locked compartments in the gambling area or in secure containers attached to the tables. A separate inventory of these cards must be maintained.
- 107 Casino operators may secure used cards in a secure container at the table following table closure.

Integrity and inspection of sensitive gambling equipment for table games

- 108 At the open and close of a table, and throughout normal gaming as far as possible, certificate of approval holders must check sensitive gambling equipment for any wear and tear, defects or irregularities.
- 109 If sensitive gambling equipment is discovered to have signs of wear and tear, or any defects or irregularities are found, the equipment must be removed from the game as soon as practicable, securely stored under tamper proof seal and labelled for future identification.
- 110 Where defects other than normal wear and tear are found a certificate of approval holder and the Surveillance Department must be notified immediately.
- 111 Where the defect is considered to be suspicious a Gambling Inspector must be notified as soon as practicable.

Integrity and inspection of sensitive gambling equipment for gaming machines and electronic table games

- 112 Casino operators must have systems in place to ensure that all gaming-related systems and software that is in use is the correct, approved version of the software.
- 113 Casino operators must ensure that sensitive gambling equipment that is affected by a fault or malfunction is taken out of service immediately and not returned to service until the fault or malfunction is rectified and the cause ascertained.
- 114 Casino operators must notify a Gambling Inspector as soon as practicable of any gaming machine fault or malfunction that may affect, or may have already affected, the integrity of a game or linked jackpot.
- 115 Casino operators must notify a Gambling Inspector as soon as practicable of any circumstance where it is believed that the outcome of a game has been, or may have been, affected by the incorrect configuration, maintenance, or operation of any sensitive gambling equipment.
- 116 Casino operators must, as soon as practicable, notify a Gambling Inspector of any gaming machine stacker that has accepted any banknote with a denomination greater than \$20, unless the particular machine is permitted to accept denominations of greater than \$20.

Decommissioned sensitive gambling equipment

- 117 Gaming machines that are no longer in use must have any portable storage devices removed before being put into storage.
- 118 When a gaming machine is disposed of, casino operators must supply details of any software in the machine at the time of disposal in addition to the information required by section 170 of the Act.

Destruction of sensitive gambling equipment

- 119 Casino operators must have procedures for the destruction of sensitive gambling equipment.
- 120 The procedures must include a requirement that the destruction of sensitive gambling equipment takes place in the presence of at least one certificate of approval holder.

Part 10 – Conduct of games

Table float

- 121 Casino operators must ensure the security of the float at all times.
- 122 When a table game is not open the float must be secured with the table inventory slip visible under a clear locking cover.

Opening and closing table games

- 123 When opening or closing a table game the dealer must verify the inventory or confirm that seals are intact as applicable.
- 124 The accuracy of the table game inventory slip must be verified and signed by the dealer and a second certificate of approval holder or above.
- 125 If there is a discrepancy of more than \$100 between the actual and recorded inventory the Surveillance Department and a Gambling Inspector must be informed.
- 126 When closing a table cards, dice, tiles and roulette balls must be secured.
- 127 The procedures set out in paragraphs 123 to 126 do not need to be undertaken if the table is closed temporarily and re-opened.

Supervision

- 128 Casino operators must have systems in place to—
 - (a) ensure that games are conducted in accordance with the gazetted rules
 - (b) monitor patrons for indicators of harmful gambling
 - (c) maintain a safe gambling environment and reduce opportunities for crime.
- 129 Systems may include, but are not limited to—
 - (a) The deployment of floor staff who have expertise in the games they supervise and the casino operator’s problem gambling identification policy
 - (b) The use of technology to mitigate the risk of errors or other activity which might compromise a game
 - (c) The effective use of surveillance systems
 - (d) The effective use of gaming-related systems
 - (e) Communication and escalation processes to ensure identified risks are addressed.

Treatment of underpayments and overpayments

- 130 In the event of an underpayment or overpayment the dealer, or relevant staff member in the case of an electronic gaming machine, must notify a supervisory certificate of approval holder immediately on discovering the error.
- 131 Casino operators must make reasonable efforts to correct the error and either retrieve the funds or return the funds to the rightful owner as applicable.

Minimum & maximum limits

- 132 Casino operators must ensure that the Surveillance Department can identify the minimum or maximum bet limits on a table game.

Reconciliation of jackpots

- 133 Casino operators must—
- (a) Reconcile actual jackpot increments to theoretical jackpot increments at least weekly
 - (b) Investigate and resolve the cause of any variances that are found
 - (c) Notify a Gambling Inspector monthly of any variances and the actions taken to correct them.

Decommissioned jackpots

- 134 When a jackpot is terminated or decommissioned, casino operators must—
- (a) Remove all relevant jackpot signage and promotion material
 - (b) Redistribute the value from the jackpot within 3 months of the decommissioning or termination.
- 135 The value that must be redistributed is—
- (a) In the case of progressive jackpots, the accumulated jackpot value less the reset value, except that if the reset value is required to ensure the minimum return to players then the reset value or part thereof must also be redistributed.
 - (b) In the case of mystery jackpots the accumulated jackpot value plus the reset value, except that if the machine turnover since the last jackpot was hit has been insufficient to fund the cost of the reset value, only that portion of the reset value that has accrued from that turnover needs to be redistributed.
 - (c) In the case of merchandise jackpots the difference between the average cost of prizes paid during the life of the jackpot and the theoretical hit value, but only where the average cost of prizes is less than the theoretical hit value.
- 136 Casino operators must notify a Gambling Inspector of—
- (a) The amount that was redistributed
 - (b) how the amount was redistributed
 - (c) the date and time of redistribution.

Part 11 – Group commission programmes

- 137 A group commission programme is a programme where at one or more persons participate in commission play under an agreement between a programme organiser and a casino operator.
- 138 Organisers of group commission programmes and their representatives must be approved by the Secretary.
- 139 Casino operators must enter into a group commission programme agreement with the programme organiser before a programme takes place. The agreement must be approved by the Secretary.
- 140 Casino operators must not enter into group commission programme agreements with organisers who have not been approved by the Secretary.
- 141 Organisers of commission programmes may authorise a player to act as their nominee for the duration of a programme.
- 142 Casino operators must notify a Gambling Inspector of incoming group commission programmes prior to the group's arrival. Notification must include details of the organiser, any authorised nominee (if applicable) and the names of participants in the group.

Part 12 – Special provisions relating to SkyCity Auckland Casino

The following provisions apply only to SkyCity Auckland casino and are contained in the agreement between SkyCity and the Crown which is given effect by the New Zealand International Convention Centre Act 2013.

- 143 In non-restricted areas, the issuance or redemption of single or multiple ticket values in excess of \$500 requires the presentation of suitable ID which will be recorded and linked to the transaction. A non-restricted area is an area other than a restricted area as defined in the New Zealand International Convention Centre Project and Licensing Agreement.
- 144 In restricted and non-restricted areas, the transfer of credits to or from a White Card in excess of \$500 requires the presentation of suitable ID which will be recorded and linked to the transaction.
- 145 For the purposes of these Minimum Operating Standards, suitable ID includes a Premier Loyalty Card or any singular document referenced in the New Zealand AML/CFT Identity Verification Code of Practice 2011 or its future equivalent.

Appendix One – Table of notification requirements contained in the minimum operating standards

Paragraph in minimum operating standard	Notification requirement	Timing
15	Underage people in casino & breaches of exclusion orders	Immediately
49	Suspected counterfeit funds	Immediately
52	Suspected cheating	Immediately
53	Offences against the Act or dishonesty involving gambling	Immediately
22	Matters relevant to certificate of approval	As soon as practicable
54	Other suspected criminal activity	As soon as practicable
56 to 58	Changes to CCTV layout	As changes are made
59	Loss of CCTV	As soon as practicable
62	Suspicious cash variance	As soon as practicable
82(e)	Suspicious variances in chip bank reconciliation	As soon as practicable
86	Evidence of tampering with new chips	As soon as practicable
94	Unresolved variances or suspicious activity with chip fills and credits	As soon as practicable
101	Evidence of tampering with new sensitive gambling equipment	As soon as practicable
111	Suspicious defects in sensitive gambling equipment	As soon as practicable
125	Discrepancy in table inventory	As soon as practicable
114	Gaming machine fault affecting integrity of game	As soon as practicable
115	Gaming machine configuration, operation, maintenance affecting integrity of game	As soon as practicable
116	Gaming machine accepting banknotes over \$20	As soon as practicable
136	Jackpot redistribution	On redistribution
118	Disposal of gaming machine	At time of disposal
142	Group commission programmes	Before arrival
17	Statistics	Monthly
21	Monthly report of changes of CoA holders	Monthly
133(c)	Jackpot variance	Monthly

SURVEILLANCE STANDARD

Introduction

The Gambling Commission may determine¹ the standard, type, installation and operation of surveillance equipment, including closed circuit television (“**CCTV**”) systems within casinos.

The Commission’s predecessor organisation, the Casino Control Authority, developed a surveillance policy (the “**Policy**”) in 1994 to outline the minimum standards and requirements for the surveillance facilities that were to apply to the casino premises in New Zealand at that time.

The Policy was amended in 2003.

The Commission adopted the Policy on its establishment in 2004. The Policy has not been substantively reviewed since it was drafted.

The Commission considers that the surveillance function at each casino should also be used in a manner that is consistent with section 3 of the Gambling Act 2003 (the purpose of the Act), including:

- (b) prevent and minimise harm from gambling, including problem gambling; and
- (d) facilitate responsible gambling; and
- (e) ensure the integrity and fairness of games; and
- (f) limit opportunities for crime or dishonesty associated with gambling and the conduct of gambling; and

This new policy, to be called the “Surveillance Standard”, has immediate effect and supersedes the Policy, which is hereby revoked. The Standard applies to all casinos in New Zealand and will remain in force until amended or revoked by the Commission.

Outcomes

The surveillance function within the casinos should contribute to the following broad outcomes:

- gambling is conducted in a manner that ensures integrity and fairness, and in accordance with rules and standards;
- gambling disputes are resolved by the casino operator in a fair and impartial manner;
- the operation of a casino is consistent with the operator’s regulatory obligations;
- opportunities for crime and dishonesty in casinos are limited with illegal activity being detected so that it can be dealt with appropriately; and
- responsible gambling is facilitated and harm from gambling is prevented and/or minimised.

Casino operators may seek additional outcomes from their surveillance function.

Objectives

The objective of this Standard is to ensure that casino operators have in place surveillance equipment, staff and procedures which contribute to the following casino objectives:

- promoting compliance with the casino’s regulatory obligations;
- ensuring that gambling activity is conducted in accordance with relevant rules and standards;

¹ Various conditions attached to the licences applicable to each casino, pursuant to section 139 and Schedule 1 of the Gambling Act 2003.

- limiting opportunities for crime, cheating and other dishonest behaviour, and detecting illegal, dishonest or suspicious behaviour;
- detecting harmful gambling behaviour and potential problem gamblers; and
- providing a mechanism for impartial review of disputes over wagering transactions and gambling outcomes to determine their validity.

Surveillance staff

Casinos must ensure that surveillance activity is not subject to interference or override from any other casino department, nor intervention from casino management which might serve to compromise the outcomes and objectives contained in this Standard.

The reporting lines for surveillance staff must reflect and facilitate the independent operation of surveillance activity.

Surveillance equipment

Casinos must install, maintain and operate surveillance equipment that meets the requirements specified below.

The surveillance equipment will operate whenever the casino is open to the public or at any other time when an activity is taking place that is subject to mandatory monitoring requirements. In the event of a system failure or outage during these times, the continuation of any specific casino processes shall be subject to any requirements specified by way of minimum operating standards (“MOS”).

CCTV system

A casino’s CCTV system must be capable of monitoring the following areas:

- the gambling conducted at each gaming table and the activities in the gaming pits;
- activity in gaming machine areas;
- any Ball Drawing Device (BDD) or random number generator used in Keno, and general operations at and in the Keno booths;
- the cashier’s cage, the chip bank and change booths;
- the movement of cash, gaming chips, drop boxes, note stackers and drop buckets within the casino;
- the count process conducted in the count rooms; and
- public entrances and exits to the casinos, the count rooms, gambling equipment stores and computer room.

The CCTV system must include the following features:

- high quality colour, light sensitive cameras, with pan-tilt-zoom (PTZ) capabilities;
- recording capability on all cameras;
- domed housing for all PTZ cameras so that their movement is not readily obvious to casino patrons and staff;
- a switching system enabling simple selection of any camera for viewing on a number of monitors; and
- audio monitoring capability in the soft count room and chip bank.

Cameras

Cameras must be equipped with lenses of sufficient magnification quality to allow the operator to distinguish clearly the value of gaming chips and the point value of playing cards.

Each camera must have an identification description which can be seen whenever that camera is displayed on a monitor or recorded.

Cameras must be installed in a manner that will prevent them from being readily obstructed, tampered with or disabled by casino patrons or staff.

Location and mix of cameras

Casinos must install a mix of fixed and PTZ cameras in sufficient numbers and combinations to ensure that the requirements of this Standard and the MOS are met. Cameras must be located in such a way that there are no blind spots or opportunities for patrons or staff to avoid camera coverage when they are undertaking activities that must be monitored under this Standard or the MOS.

The location and combination of cameras must ensure coverage of:

- the conduct of gambling at each gaming table, including coverage of the layout(s) of the table and, where practical, any equipment used to conduct the game with sufficient fixed cameras to ensure that there is continuous recording of each gaming table;
- general activities in and around the tables in which casino type games are played, whether or not they are used for gambling purposes;
- activity at each gaming machine with sufficient camera coverage to ensure the continuous recording of each bank of machines;
- the BDD used in any Keno game, and detailed monitoring of the transactions of each operator in any Keno booth and/or Racing Game booth, with at least one fixed camera continuously recording the BDD and transactions in the booths;
- all activities and transactions of cashiers in the cage, chip banks and cage booths, with at least one fixed camera recording continuously and sufficient PTZ cameras to monitor transactions in detail;
- activities in the hard and soft count rooms and the entrances and exits to those rooms, with at least one fixed camera recording continuously and sufficient PTZ cameras to allow detailed monitoring of the emptying and processing of the contents of drop boxes, note stackers and drop buckets;
- drop routes;
- the movement of chips and/or money from one destination to another;
- entrances and exits to sensitive gambling equipment stores and the computer room with at least one fixed camera recording continuously; and
- public entrances and exits to the casino with at least one fixed camera continuously recording these areas.

For the avoidance of doubt, where a licence holder has approval through licence conditions to install tables on which casino type games may be played in the Gambling Area but which are not used for gambling purposes (fun-play tables), the casino is not required to monitor play on those tables but must monitor general activities in and around the tables.

Recording and replay facilities

Recording and replay facilities must satisfy the following requirements:

- all fixed gaming cameras are to be permanently recorded;

- any activity which must be monitored under the MOS must be recorded;
- recording technology must be capable of jitter- free freeze framing for the reproduction of colour photographs;
- picture quality in conjunction with procedural evidence must be of sufficient standard to satisfy any requirements in relation to the admissibility of evidence in a New Zealand Court of Law;
- time and date insertion must be superimposed on all images being recorded and centrally synchronised with a systems clock to avoid discrepancies; and
- there must be sufficient storage space to enable recordings to be retained for a minimum of seven days.

Monitoring facilities

Casinos must monitor the CCTV system from a secure control room.

Casino Inspectors from the Department of Internal Affairs must be provided with access to the casino's CCTV system (either from a facility within the casino or at an off-site facility) so that they may independently control and view any camera connected to the system and can review all recorded footage.

However access is provided, the system must have a mechanism identifying who has immediate control of a PTZ camera to avoid either party unintentionally interrupting specific monitoring activity being carried out by the other. During an emergency or operationally critical event, casino surveillance staff may exercise exclusive control over the PTZ cameras. In the event that the casino surveillance staff exercise exclusive control of any PTZ camera, they must immediately advise the gambling inspectors of the emergency or operationally critical event, the exercise of the right and the affected cameras. The right to exercise control does not extend to interrupting the video feed of, or recording from, any camera.

Approval of facilities

The suitability of any casino's surveillance equipment and its associated facilities will be determined by the Commission based on the requirements established by this Standard. Notwithstanding anything contained in this Standard, the Commission reserves the right to exercise its discretion in exceptional or unusual circumstances to approve equipment and facilities complying substantially with the applicable standards set out in this Standard, provided it is satisfied that adequate compensating controls are in place. Similarly the Commission reserves the right to require the placement of additional cameras in locations not specified in this Standard where it is of the view that additional cameras are required to satisfy the outcomes highlighted earlier in this document.

The Commission recognises that developments in technology may provide operators with opportunities to enhance their surveillance capability. Where such technological developments are not specifically accommodated by this Standard the Commission will consider submissions for change on a case by case basis.

Appendix 14.8 – Host Responsibility Programme



CHRISTCHURCH

CASINO

HOST RESPONSIBILITY PROGRAMME
CHRISTCHURCH CASINOS LIMITED

TABLE OF CONTENTS

1.0 Introduction	3
1.1 Statement of position	4
1.2 Programme objectives.....	5
2.0 Harm minimisation and prevention components.....	6
2.1 Policies and procedures.....	7
2.1.1 Exclusion.....	8
2.1.2 Responsible Service of Alcohol.....	11
2.1.3 Unaccompanied children	13
2.1.4 Underage persons	14
2.1.5 Standards of dress and behaviour.....	15
2.1.6 Long Hours of Presence or Play	16
2.1.7 Gambling limitation	16
2.1.8 Cashless Gambling.....	16
2.2 Host Responsibility information for customers	218
2.3 Employee gambling-related harm.....	23
2.4 Stakeholder engagement.....	25
2.5 Environmental design	26
2.6 Safe gambling environment.....	27
2.6.1 Safe gambling environment – third party loans for financial gain	28
2.6.2 Safe gambling environment – credit provision	28
2.7 Responsible marketing	30
2.8 Display of signage and provision of gaming information to customers	31
2.9 Learning and development	33
2.10 Identification of problem gamblers	36
3.0 Monitoring and reporting.....	37

Appendix A – Current Host Responsibility Resources for Customers

Appendix B – Identification Policy

1.0 Introduction

Approval

Effective date: 13 November 2017

Manager:



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 Agreed Limitation; and
- Long periods of play.

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation; and
- Analysis and Intervention;
- 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 cases¹. 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.

¹ Section 309A

- 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, 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 customer.
- 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 on any part of its premises or surrounding environs.

Approach

Christchurch Casino takes active steps to prevent children being without adult supervision.

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.

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 minimum:

- 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 must 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 must 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 under the Act, the Policy or this Programme:
 - local customers must be requested to leave the casino for at least 24 hours;
 - international VIP customers must be assessed by Host Responsibility to determine whether they should be allowed to remain.

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 minimum:

- 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:
 - local customers must be requested to leave the casino for at least 24 hours; and
 - international VIP customers must be assessed by Host Responsibility to determine whether their play should be permitted to continue or not.

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.

Agreed Limitation

Customers who are eligible for participation in Agreed Limitation are offered several "Limited Participation" options to assist in minimising the potential for gambling harm. They are as follows:

- restrictions placed on the number of visits over a specified period of time;
- restrictions on the hours spent on site on any gaming day;
- restrictions on monies spent on site on any gaming day;
- a combination of the above.

An offer of Agreed Limitation is not a substitute for, or an alternative to the provision of information on the availability of self-exclusion. Agreed Limitation will only be made available in circumstances where a customer can gamble without experiencing harm.

Customers identified for participation in the Agreed Limitation programme are provided with information regarding exclusion options prior to signing an Agreed Limitation Agreement. Should a customer on the Agreed Limitation programme request self-exclusion, this request must be facilitated immediately and will take precedence over any Agreed Limitation Agreement.

Agreed Limitation is not intended to be a replacement for professional counselling. Contact details for problem gambling counselling services are available to customers at all times and any customer wishing to access these services is supported to do so.

Details for administering Agreed Limitation are shown in the Agreed Limitation SOP.

2.1.8 Cashless Gambling

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:

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

- either by ticket acceptance or a player loyalty cashless account, transfer/accept cash equivalent credits for play up to a maximum of \$5,999;
- 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
- 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:

- issue a single or multiple tickets up to a maximum combined ticket;
- value of \$1,000;
- transfer equivalent credits to a player loyalty cashless account, up to a maximum value of \$5,999;
- cash out in cash a single ticket with a value of up to a maximum of \$1,000 in any denomination; and
- 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:

- by ticket acceptance, transfer/accept cash equivalent credits for play;
- up to a maximum of \$5,999;
- transfer/accept unlimited cash equivalent credits from a player loyalty cashless account;
- 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
- transfer unlimited credits to a player loyalty cashless account.

Christchurch Casino has a range of measures to minimise 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) 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.

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 it believes may be problem gamblers, or who disclose relevant indicators (as set out in Christchurch Casino's Problem Gambler 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 its 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 its 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 – credit provision

Policy

Christchurch Casino will offer and extend credit to customers for the purposes of gambling only in the circumstances approved by the Gambling Commission pursuant to section 15 of the Gambling Act 2003.

Requirements

Christchurch Casino will only extend credit to short-term visitors to New Zealand or to organisers of overseas group commission programmes.

Host Responsibility will record and monitor for indicators of potential gambling harm the activities of any customer whose credit terms (by time or amount) are extended beyond the initial arrangements, or who fails to repay the credit extended within the period initially agreed or within 30 days (whichever is the shorter).

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.

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 Christchurch Casino 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.

Gambling Related Measures	Source of data	Frequency
<ul style="list-style-type: none"> Number of customers about whom there have been observations. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of indicators reported to Host Responsibility. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of approaches to Christchurch Casino by third parties. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> 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	Annual
<ul style="list-style-type: none"> Number of customers in Host Responsibility log. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of GOI files by: <ul style="list-style-type: none"> ethnicity gender age preferred mode of gambling (tables/EGMs). 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of interventions conducted with customers. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of exclusions by: <ul style="list-style-type: none"> ethnicity gender age preferred mode of gambling prompted by third party disclosures exclusion type (self/Christchurch Casino) timeframe following re-entry. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi venue exclusions. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi casino exclusions. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in Pre-Commitment. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of excluded customers agreeing to be contacted by help services on exclusion form. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of breaches of exclusion by: <ul style="list-style-type: none"> ethnicity gender age. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of successful and unsuccessful applications to re-enter following exclusion. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of persons trespassed or required to leave for making loans for financial gain. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers enrolled to use SET. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers with GOI file opened after enrolling to use SET. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers Casino-Excluded or Self-Excluded after enrolling to use SET. 	Christchurch Casino	Annual

Measures relating to responsible consumption of alcohol		
• 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
Measures relating to employee training		
<ul style="list-style-type: none"> • 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
• Employee recall of knowledge and behaviours related to host responsibility and associated policies and procedures.	Christchurch Casino	Annual
• 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
Other Programme activity and compliance-related measures		
• 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;
 - o Chinese
 - o Korean
 - o 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 Christchurch Casino’s 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 B



CHRISTCHURCH

CASINO

PROBLEM GAMBLER IDENTIFICATION POLICY
(Gambling Act 2003, sections 308-312A)

Problem Gambler Identification Policy

References: Gambling Act 2003 ("Act"), sections 308, 309, 309A, 310, 311 & 312A

Objective

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Act to enable Christchurch Casino to take all reasonable steps to identify actual or potential problem gamblers and to act on that information.

Statutory Requirements

Section 308 of the Act requires the holder of a casino operator's licence who is conducting casino gambling to develop a policy for identifying problem gamblers. This Policy has been developed by Christchurch Casino pursuant to section 308(1). Using this Policy, all reasonable steps must be taken to identify actual or potential problem gamblers.

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.

The information or advice offered must include a description of:

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

After offering information or advice, the holder of a casino operator's licence may issue an Exclusion Order to the person that prohibits the person from entering the Gambling Area of the casino venue for a period of up to two years.

Section 309A of the Act requires the casino operator, or person acting on its behalf, to take all reasonable steps to assist anyone who, it has reasonable grounds to suspect, is a problem gambler, who did not request Self-Exclusion after being approached but whose ongoing conduct gives rise to reasonable grounds to believe is a problem gambler. The required assistance expressly includes issuing an Exclusion Order, despite the lack of request to do so, in appropriate cases.

Section 310 of the Act requires that the holder of a casino operator's licence, or person acting on their behalf, must promptly, after being requested, issue an Exclusion Order to a person that prohibits the person from entering the Gambling Area of the casino venue for a period of up to two years if the person:

- (a) has identified himself or herself as a problem gambler; and
- (b) has made a request to prohibit themselves from entering the venue concerned.

Section 311 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of, must remove any person who enters the Gambling Area of a casino venue in breach of an Exclusion Order.

Section 312A of the Act requires a casino operator to keep records of certain specified information about Exclusions, including identifying details, the manner, date and length of the Exclusion and the conditions of re-entry and provide them if requested by the Secretary.

Scope of Christchurch Casino Problem Gambler Identification Policy

This Policy describes:

- the legal definition of a problem gambler;
- indicators of problem gambling;
- a description of sources of indicator data to be used by Christchurch Casino;
- a description of how indicator data is to be used by Christchurch Casino to identify problem gamblers; and
- an outline of record-keeping requirements and review of the Policy.

Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

- Exclusion and Re-Entry;
- Unaccompanied children and
- Pre-Commitment.

Section One – Definition of a problem gambler

Under the Act, a problem gambler is “a person whose gambling causes harm or may cause harm”.

“Harm” is defined as:

- (a) harm or distress of any kind arising from, or caused or exacerbated by, a person’s gambling; and
- (b) includes personal, social or economic harm suffered:
 - (i) by the person; or
 - (ii) the person’s spouse, partner, family, whanau, or wider community; or
 - (iii) in the workplace; or
 - (iv) by society at large.

The Act’s obligations are not confined to a single category of persons who have been formally diagnosed as problem gamblers. The definition of “problem gambler” includes an element of potentiality and the Act’s provisions cover a range which extends from potential problem gamblers (a person who is potentially someone whose gambling may cause harm) to self-identified problem gamblers.

As a general guide:

- (a) A problem gambler is someone whose gambling conduct has characteristics which “may cause harm”. While the possibility of harm being caused by an activity can only be completely excluded if the activity itself does not take place, the term is not applied like that. A problem gambler (or an “actual” problem gambler) is not limited to someone whose gambling has actually caused harm but includes someone who is gambling in a manner which may cause harm. The definition focuses on gambling behaviour of a kind with the potential to cause harm (or which does cause harm) rather than solely on harm after the event.
- (b) The PGIP required by section 308(1) must be used to identify actual or potential problem gamblers (section 308(4)); that is, those who are or may be gambling in a manner which may cause harm.
- (c) Of those identified as actual or potential problem gamblers, those whom the casino operator has reasonable cause to believe to be a problem gambler (someone who is gambling in a manner which may cause harm) must be approached and given information.
- (d) The casino operator must take reasonable steps to assist (including exclusion, if appropriate) those who do not request exclusion, if the operator has reasonable cause to believe that they are problem gamblers.
- (e) Those who identify themselves as problem gamblers and who request exclusion must be excluded by the casino operator for a period of up to 2 years.

Section Two - Indicators of problem gambling

Introduction

Christchurch Casino uses a number of indicators to assess whether a customer is likely to be a problem gambler. Although these indicators provide an appropriate basis for making determinations as to whether someone is a problem gambler, the nature and range of indicators may vary from one customer to the next. Wherever possible, indicator information should be interpreted in the context of other relevant information to develop an overall assessment of the customer's position.

Christchurch Casino utilises a list of visible signs and behaviours that may be indicators of gambling-related harm. Some of these can be considered "high confidence" or "strong indicators".

"*Strong indicators*" are those where the presentation of even one or two indicators is usually sufficient to identify the person as a problem gambler.

Other indicators referred to as "*general indicators*" are behaviours which may be observed in a range of gamblers, but occur more frequently amongst problem gamblers. They are warning signs that may, or may not, indicate a problem if only one or two factors are observed in isolation, but which become indicative when a greater number of signs are observed together or across time.

Problem gamblers can be identified by inferring that harm is present or may occur using the indicators set out below. They can also be identified on the basis of information from customers or persons affected by a customer's gambling behaviour. Customers (and affected persons) may directly disclose that the customer is experiencing problems with gambling, or requires assistance (e.g. they want to self-exclude), or do so indirectly.

INDICATORS

Strong Indicators

- Requests to self-exclude;
- Self-identified problem gambler;
- Self-disclosures that may or may not make reference to the person's gambling;
- Third-party disclosures that may or may not make reference to the person's gambling;
or
- Severe emotional distress due to gambling, including crying or expression of suicidal thoughts.
- Unaccompanied children.

General indicators

Intensity and Frequency of Play

- Very high visitation frequency (for example, 5 times per week up to daily) combined with high levels of expenditure on gaming machines (for example, \$250+ lost per session) over a period of time (for example, 1 month);
- High visitation frequency (for example 2 times per week or more), combined with very high levels of expenditure on gaming machines (for example, \$400+ lost per session) over a period of time (for example, 1 month);
- High visitation frequency combined with very high levels of expenditure on all forms of gambling, including table games, over a period of time;
- Very few breaks from gambling – almost continuous play;

- Increasing periods of play, and betting more each time, noted over a period of time (noting that gambling expenditure may reduce as the customer's financial resources are exhausted);
- Disconnect with time spent playing, including missing key times (e.g. meals), rushing when leaving machine or staying after friends/family leave;
- Changes in patterns of play; or
- Breaching pre-commitment limits and/or multiple increases or disabling of pre-commitment limits.

Visible Emotional Disturbance

- Emotional distress including agitation, mood swings, or changes in behaviour;
- Personalising machines, including abuse of machines;
- Irritated by interruptions to gambling;
- Rudeness and complaints to employees about gambling outcomes; or
- Possessiveness of particular machines or spots at tables (e.g. standing over other patrons, hovering, aggression).

Dysfunction in Social Behaviour

- Attempts to conceal gambling activities including making phone calls giving excuses for lateness;
- Steps apparently taken to avoid monitoring of gambling activity, such as ceasing to use a loyalty card;
- Not celebrating wins;
- Disintegration of physical appearance (e.g. clothing or personal hygiene) over time;
- Family/friends seeking out or enquiring about a customer;
- Falling asleep at a machine or table;
- Claims of malfunction of gaming machines or gaming errors;
- High consumption of alcohol while gambling (e.g. demanding drinks);
- Interaction with a known or suspected loan shark; or
- Previous exclusion (by self or casino) or breach of any harm minimisation requirement.

Excessive Access to Money

- Leaving the casino to get additional money and coming back after having appeared to have run out of money;
- Seeking an extension of credit arrangements or failing to repay when agreed or within 30 days (whichever is the shorter).
- Repeated ATM or Cash Desk visits and/or multiple declined transactions;
- Borrowing money, including begging;
- Not having sufficient money to exit car park;
- Constantly seeking complimentaries; or
- Looking for residual credit on gaming machines, or coins left in the collect tray.

Expenditure and Frequency of Play

Both expenditure and frequency of play, especially on gaming machines, are currently included as general indicators, rather than as strong indicators, because it is recognised that not all customers who exhibit high expenditure levels and frequent visitation are necessarily problem gamblers. However, such indicators are much more likely to be observed amongst problem gamblers than others and therefore may indicate a greater risk of gambling-related harm. It is established from international research that problem gamblers are more likely than other players to lose control of their expenditure, to chase their losses, and to have very strong urges to gamble. Most studies of problem gambling have found that problem gamblers spend significantly more, and gamble significantly more frequently than other players.

Frequency and expenditure data are especially important as indicators in the case of users of gaming machines for several reasons:

- It is easier for people to gamble without being noticed because gaming machine gambling involves very little interaction with casino employees compared to table games, making it less likely that their behaviour and emotional reactions will be observed;
- There is a stronger relationship between problem gambling and play on gaming machines than with other forms of casino gambling;
- Electronic data gathering from gaming machines is more accurate than from table games.

Other Observations

The indicators listed above are not exclusive – employees are encouraged to report observations of customers based on other factors which raise concerns.

Section Three – Sources of Indicator Data

The indicators described in Section 2 may emerge from the five principal sources of information Christchurch Casino collects, collates and analyses. Information sources include:

- customer disclosures;
- behavioural observations;
- customer data including loyalty;
- third-party disclosures; and
- interviews with customers or employees.

All information on customers collated from the sources described below is recorded as soon as practicable into Christchurch Casino's security and surveillance database.

This database centralises information from multiple business sources (Security, Surveillance, Host Responsibility and Gaming) which can be shared across appropriate Christchurch Casino staff.

Host Responsibility use the security and surveillance database to record, manage, review and assess all information about all customers on the database, including Gamblers of Interest and excluded or banned customers.

CUSTOMER DISCLOSURES

Customer disclosures may or may not make reference to the person's gambling (i.e. they may be direct or indirect).

Direct disclosures

Direct disclosures make reference to a customer's gambling and examples may include any of the following:

- I think I have a gambling problem;
- I want to be excluded/barred; or
- I don't want to come here anymore.

Indirect disclosures

Indirect disclosures do not make reference to a customer's gambling and examples may include any of the following:

- comments regarding impact on personal life;
- voicing repeated attempts to stop or control gambling;
- comments regarding psychological distress; or
- comments regarding financial distress.

The significance of indirect disclosures should be determined by the nature of the disclosure. Indirect disclosures referring to harm, financial difficulties or loss of control would lead to a high suspicion that the person was experiencing, or at risk of experiencing, harm associated with their gambling.

Direct and indirect disclosures from customers must be recorded into the security and surveillance database and made available to Host Responsibility, as soon as practicable, to be used in making problem gambling assessments.

BEHAVIOURAL OBSERVATIONS

Although employees cannot be expected to watch all customers on all occasions, the process of observation and identification is enhanced by the fact that one may observe a clustering of indicators. Those customers who present with strong indicators, or who produce several common indicators, may produce many more.

In effect, problem gamblers may draw attention to themselves through observable behaviour. Employees should use this information to focus their observations to particular customers.

At the same time, there will be customers where the problematic behaviour may be 'silent' or hidden. Some patrons may gamble very frequently, spend very large amounts of money, but not produce any obvious emotional responses or other indicators to draw attention to themselves. For this reason, employees should remain vigilant to the presence of people who spend many hours in the casino, and who visit very frequently. In such cases, employees should be vigilant for additional indicators of harm. As noted below, frequency of gambling and level of expenditure are indicators in their own right, and also ways of identifying people who require additional observation.

Employees who observe the indicators specified in Section 2 must report the observation to the appropriate supervisor/manager. All observations of indicators reported to them by employees and any follow up responses taken by employees and/or supervisors/managers must be logged into the security and surveillance database by the supervisor/manager so as to make the record of the disclosure or observation available to Host Responsibility as soon as practicable. The reported disclosures and observations form part of the body of information upon which assessments of problem gambling are to be made.

CUSTOMER DATA INCLUDING LOYALTY

High levels of frequency and expenditure are indicators (see Section 2). Christchurch Casino will monitor the amount of money and time spent over time proactively using the Loyalty Programme. Although high levels of expenditure and visitation are listed as general indicators, it is important that Christchurch Casino take steps (where it has concerns about a player's expenditure or visitation frequency) to obtain additional information that places this behaviour into context. For example, through discussions with the customer or other parties, there may be direct or indirect disclosures concerning the lack of affordability of the gambling. Alternatively, employees might find that some players who spend very large amounts appear to be chasing their losses, or are making very frequent use of ATMs, or are leaving the casino and then returning with additional money. Christchurch Casino may also make enquiries about the affordability of losses.

In addition, where a customer is brought to the attention of Host Responsibility by disclosure or observation, Christchurch Casino must ascertain whether the customer is a Loyalty member. Where the customer is a member of the Loyalty Programme, Christchurch Casino will examine their data to determine:

- their time of play;
- duration of play;
- turnover;
- win/loss;
- patterns of expenditure (e.g. increase over time);
- games played;
- tier upgrades;
- non-gaming use of card (e.g. car park use); and
- visitation frequency.

Christchurch Casino will include a flag in the loyalty card database to alert relevant employees to immediately report to Surveillance, potential or problem gamblers on site.

All relevant information will be recorded into the security and surveillance database as soon as practicable and made available to Host Responsibility.

THIRD PARTY DISCLOSURES

Information concerning gambling-related harm may also be obtained via third-parties. This might include:

- an enquiry from a concerned family/whanau member; or
- a formal enquiry about the potential problem gambler from the wider community (e.g. probation officer, general practitioner or employer).

A third party may only seek general information about a customer, and will not always voluntarily identify gambling as the cause of their concerns about a customer (e.g. who may be a friend or relative of the inquirer). Where a third party appears to express general concern about a customer, employees will ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this will be recorded into the security and surveillance database and made available to Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g. via Loyalty card use, if available or feasible) should be undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Christchurch Casino will also provide to the customer problem gambling information, including Exclusion options. The action must be logged into the security and surveillance database and made available to Host Responsibility as soon as practicable, a GOI file is opened, and an investigation is undertaken.

A third party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and will be treated on an urgent basis. The third party must be referred immediately to a Shift Manager or Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g. via Loyalty card use, if available or feasible), should be undertaken. If the customer is found, further enquiry must be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Christchurch Casino must also provide to the customer problem gambling information, including Exclusion options. The action must be logged into the security and surveillance database and made available to Host Responsibility as soon as practicable, a GOI file opened, and an investigation is undertaken.

All third party information should be corroborated as part of an internal investigation. The Exclusion SOP outlines the specific steps taken by Christchurch Casino in corroborating information.

INTERVIEWS WITH CUSTOMERS OR EMPLOYEES

From time-to-time, Host Responsibility, or other appropriate employees may interview either customers or employees as part of an investigation.

Customer interviews: During the course of an interview, information may be disclosed by a customer that suggests that he/she may be experiencing harm or gambling in a way that may cause harm. All such information must be recorded into the security and surveillance database and made available to Host Responsibility as soon as practicable.

Employee interviews: During the course of an interview, information may be disclosed by an employee that suggests a customer may be experiencing harm or gambling in a way that may cause harm. This information must be recorded into the security and surveillance database and made available to Host Responsibility as soon as practicable.

Section Four - Identification

Section 2 highlights the indicators that are taken into account in identifying whether a customer may be an actual or potential problem gambler.

Section 3 identifies the primary sources of information available to identify problem gamblers. It also describes the ways in which this information might be utilised and consolidated so as to assist in the identification process.

Christchurch Casino must use data from the sources identified in Section 3 to identify customers who are actual or potential problem gamblers, i.e. where their gambling is causing harm, or may cause harm, to the customer or others. Once identified, Christchurch Casino will determine, based on direct information or inference (using indicators) whether it has reasonable cause to suspect that the customer is or has been gambling in a manner that has caused harm or may cause harm. If so, Christchurch Casino's legal obligations under sections 309-312A of the Act are engaged immediately.

Depending on the assessment, including the perceived severity and urgency of a situation, Christchurch Casino provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring.

Obligation to Identify

The assessment by Christchurch Casino as to whether there is reasonable cause to believe that a customer is a problem gambler must be made in good faith, in accordance with the statutory test and within a reasonable timeframe.

Analysis of Information

As outlined in Section 5, all disclosures or observations related to indicators of harm noted by any casino employees are reported to, and recorded by Host Responsibility.

When a disclosure or observation report is made available to Host Responsibility, Host Responsibility must collate and review all information available to it in relation to the relevant customer. This includes a review of incident reporting and loyalty databases and other relevant internal information sources. Host Responsibility may also make further enquiries of relevant employees in relation to that customer.

Host Responsibility undertakes a section 309 assessment based on the information collated.

A variety of different types of information is used when undertaking a section 309 assessment, taking into account:

- severity of presenting indicators;
- anti-social behaviour including uncharacteristic or unusual behaviour;
- uncharacteristic changes in appearance;
- changes in patterns of play; and
- number of indicators and repetition over time.

Identification

Strong indicators

Direct disclosures by customers are expected to result in an immediate assessment that a customer is a problem gambler, with Christchurch Casino taking the required steps in response promptly.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler unless another more likely explanation is established.

For instance, although emotional distress may be a reliable and valid indicator of gambling-related harm, not all people who appear distressed will necessarily feel this way because of gambling. Therefore, if this strong indicator is evident, it would be appropriate to interpret the person's behaviour in the context of other indicators. For example, is the person gambling large amounts of money for long periods and displaying other signs of gambling-related harm? If a person only appears distressed, such people should be approached initially on the assumption that they require general assistance, but not necessarily because their gambling is a problem.

General indicators

The observation of small clusters of general indicators should be sufficient to trigger further monitoring but, depending on the circumstances, may not necessarily lead to an immediate assessment that the customer is a problem gambler. As part of a graduated response, it is expected that such people should be subject to further monitoring to determine whether any further general indicators emerge, including the repetition of the same indicators. If there is an accumulation of general indicators over a period of time (e.g. several general indicators recur during a one month period) Christchurch Casino would have reasonable grounds to consider such people to be problem gamblers.

Consequences of Identification

Once identified as a problem gambler, Christchurch Casino must:

- (a) if it has not done so already, open a GOI file;
- (b) offer assistance and information to the customer about problem gambling, including a description of Self-Exclusion procedures, within a reasonable time of identification, taking into account the urgency of the situation and the risk of harm¹;
- (c) issue an Exclusion Order immediately if requested to do so by the customer²; and
- (d) consider whether it would be appropriate to issue an Exclusion Order without any request to do so as a means of providing assistance to the customer³.

¹ Section 309

² Section 310

³ Section 309A

Section Five – Record keeping

Recording, collation and analysis of information

Host Responsibility is responsible for the collation, analysis and electronic recording of all information relating to indicators of harm. Host Responsibility also keeps records of observations noted by frontline employees, supervisor/managers, and of all direct and third party disclosures, interactions and interventions undertaken in relation to a customer by frontline employees and supervisor/managers.

Host Responsibility also records the section 309 assessment referred to in Section 4, and the outcome of that assessment.

As outlined in Section 3, all information collated by Christchurch Casino in relation to a customer is recorded as soon as practicable into the security and surveillance database.

Host Responsibility uses the security and surveillance database to manage, monitor, review and assess information about all customers on the database, including gamblers of interest and excluded or trespassed customers.

GOI files

A key purpose of a GOI file is to institute a formal monitoring process in relation to a customer. A GOI file is opened by Host Responsibility:

- in circumstances where a customer has come to the attention of Host Responsibility for monitoring;
- a third party disclosure is made in relation to a customer's gambling;
- when required by the terms of any approved circumstances for providing credit; or
- a customer returns from Exclusion having fulfilled the Re-Entry criteria.

Christchurch Casino may also open a GOI file in other circumstances, as may be appropriate, including where:

- information is requested or presented from government agencies; or
- suspected or actual undesirable activity is present, including unattended children, unaccompanied minors or breaches of trespass orders.

Once opened, all available customer data to assist the assessment of whether a customer is a problem gambler must be obtained and placed on the file. In the case of customers who come to attention as a result of expenditure and visitation frequency, a GOI file must be open so that further information and observations can be recorded for assessment.

At a minimum, Christchurch Casino will review GOI files monthly for the duration of the GOI investigation.

Whenever new information becomes available or is obtained, a problem gambling reassessment must be undertaken. Except in the case of returning excluded customers, if an assessment is made that the customer is not a problem gambler following a review after 12 weeks, the GOI file may be deactivated. In the case of returning excluded customers, the GOI file must remain open and kept under review for at least 6 months. In all cases, if concerns remain, the file must be left open and reviewed at least monthly.

All deactivated GOI files will be retained by Christchurch Casino. A GOI file may be reactivated at any stage subsequent to the review period if further information or indicators in relation to a customer emerge. In this case, a problem gambling reassessment will be undertaken, and monitoring will continue as part of the customer information review process.

Whenever an Exclusion Order is made, whether at the request of a customer or as a result of a decision taken by the casino operator to assist a suspected problem gambler, all of the information required by section 312A must be recorded on the relevant GOI file, retained and provided to the Secretary if requested.

Section Six – Review

The Problem Gambler Identification Policy will be measured and monitored as part of the Christchurch Host Responsibility Programme.

Where new evidence emerges in relation to indicators of harm and identification of problem gamblers, Christchurch Casino will review its Problem Gambler Identification Policy accordingly.

Appendix 14.9 – Decision of Gambling Commission on application by CCL for approval of independent experts to prepare Casino Impact Report

IN THE MATTER of the Gambling Act 2003
AND on an application by
CHRISTCHURCH CASINOS LIMITED for approval of independent experts to prepare a Casino Impact Report to accompany the renewal application for its Casino Venue Licence

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
L M Hansen
R D Bell
D C Matahaere-Atariki
W N Harvey

Date of Application: 2 September 2016

Date of Decision: 4 November 2016

Date of Notification
of Decision: 11th November 2016

**DECISION ON AN APPLICATION BY CHRISTCHURCH CASINOS LIMITED
FOR APPROVAL OF INDEPENDENT EXPERTS TO PREPARE A CASINO IMPACT REPORT
TO ACCOMPANY THE RENEWAL APPLICATION FOR ITS CASINO VENUE LICENCE**

Introduction

1. Christchurch Casinos Limited ("**CCL**") is undertaking the preparatory work necessary to make an application to renew its casino venue licence pursuant to section 134 of the Gambling 2003 (the "**Act**"). CCL's application must be accompanied by a casino impact report ("**CIR**") which must be prepared by someone who is approved by the Commission as being independent of CCL.
2. CCL identified two people, James Baines and Geoffrey Butcher, to draft the CIR. It submitted the CVs of these gentlemen to the Commission and requested that it approve them as being independent of CCL, pursuant to section 134(3) of the Act.

Legislation

3. The relevant sections of the Act are as follows:

134 Application for renewal of casino venue licence

- (1) The holder of a casino venue licence may apply to the Gambling Commission to renew the licence.
- (2) An application under subsection (1) must be—
 - (a) made in the period that is at least 1 year but not more than 2 years before the date on which the licence is due to expire; and
 - (b) on the relevant form; and
 - (c) accompanied by a casino impact report.
- (3) A casino impact report must be prepared by a person approved by the Commission as independent of the applicant, and must—
 - (a) 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—
 - (i) the continued operation of the casino; and
 - (ii) the closure of the casino; and
 - (b) report on matters identified by the Gambling Commission.
- (4) The Gambling Commission may specify the research to be undertaken in preparing a casino impact report.
- (5) The applicant for renewal of a casino venue licence must pay for the casino impact report.

137 Renewal of casino venue licence

- (1) The Gambling Commission must not renew a casino venue licence unless it is satisfied that—
 - (a) the applicant and persons with a significant influence are suitable in terms of section 124; and
 - (b) the applicant's compliance record, and that of persons with a significant influence, is satisfactory; and
 - (c) renewing the licence will result in a net benefit—
 - (i) to the local and regional communities around the casino; and
 - (ii) to New Zealand generally.
- (2) In assessing whether there is a net benefit, the Gambling Commission must consider—
 - (a) the social and economic effects of granting, or refusing to grant, the renewal; and
 - (b) the level of support for the application, including the result of any poll conducted by the local authority; and
 - (c) the nature and standard of the casino facilities.

138 Expiry of casino venue licence

- (1) A casino venue licence expires 25 years after the date the casino commenced operating.
- (2) A licence that is renewed under section 137 expires 15 years after the date of renewal.
- (3) A casino venue licence may be renewed more than once.
- (4) A casino venue licence to which an application for renewal relates continues in force until the Gambling Commission decides whether or not to renew that licence.

High Court Rules

4. Schedule 4 of the High Court Rules is as follows:

Schedule 4 – Code of conduct for expert witnesses**Duty to the court**

- 1 An expert witness has an overriding duty to assist the court impartially on relevant matters within the expert's area of expertise.
- 2 An expert witness is not an advocate for the party who engages the witness.

Evidence of expert witness

- 3 In any evidence given by an expert witness, the expert witness must—
 - (a) acknowledge that the expert witness has read this code of conduct and agrees to comply with it;
 - (b) state the expert witness' qualifications as an expert;
 - (c) state the issues the evidence of the expert witness addresses and that the evidence is within the expert's area of expertise;
 - (d) state the facts and assumptions on which the opinions of the expert witness are based;
 - (e) state the reasons for the opinions given by the expert witness;
 - (f) specify any literature or other material used or relied on in support of the opinions expressed by the expert witness;
 - (g) describe any examinations, tests, or other investigations on which the expert witness has relied and identify, and give details of the qualifications of, any person who carried them out.
- 4 If an expert witness believes that his or her evidence or any part of it may be incomplete or inaccurate without some qualification, that qualification must be stated in his or her evidence.
- 5 If an expert witness believes that his or her opinion is not a concluded opinion because of insufficient research or data or for any other reason, this must be stated in his or her evidence.

Duty to confer

- 6 An expert witness must comply with any direction of the court to—
- (a) confer with another expert witness;
 - (b) try to reach agreement with the other expert witness on matters within the field of expertise of the expert witnesses;
 - (c) prepare and sign a joint witness statement stating the matters on which the expert witnesses agree and the matters on which they do not agree, including the reasons for their disagreement.
- 7 In conferring with another expert witness, the expert witness must exercise independent and professional judgment, and must not act on the instructions or directions of any person to withhold or avoid agreement.

Submissions by CCL

5. CCL submitted, in summary, that:
- (a) It wants to engage James Baines and Geoffrey Butcher to draft the CIR to accompany its Casino Licence renewal application.
 - (b) It is confident in the ability and suitability of both consultants and believes there to be no issue in gaining approval for them to complete the required work.

Analysis

6. This is the first occasion that the Commission has had reason to consider section 134(3) of the Act and to decide on its approach to approval of the independence of persons preparing a CIR.
7. The CIR required by section 134(2)(c) is an important document. The Commission is required by section 136 to consider it before deciding whether to renew a casino licence. Under section 137(1)(c), the Commission cannot renew a casino licence unless it is satisfied that renewal will result in a net benefit to the local and regional communities and to New Zealand generally and, under section 137(2)(a), in assessing whether there is a net benefit, it must consider the social and economic effect of granting or refusing renewal. The CIR therefore addresses key matters for the satisfaction of the Commission. The Commission concluded that its approval of the independence of the CIR authors is intended to increase the likely value and integrity of those reports.
8. The Commission approached the requirement to be “independent” as being satisfied that the proposed authors have no past or present relationships, associations or interests which would materially affect their views on the subject matter of the report. It requires the Commission to consider that the nominee will form and provide his or her own impartial views, free from the influence of the applicant and related interests.

9. While CVs are relevant to that inquiry, the Commission considered that more was required. The Commission wrote to CCL on 14 October 2016 setting out the reasons why it must be satisfied of the independence of the proposed authors of the CIR before it can renew a casino licence. The Commission advised CCL that the following matters should be covered in the submissions of the proposed authors of the CIR:
- (a) a statement that the candidate has no past or present relationship, association or interest, whether professional, business or personal, which might be regarded as potentially affecting his or her impartiality in formulating the report (or, alternatively, identification of any such relationship, association or interest);
 - (b) to the extent that the candidate has previously had any relationship, association or interest in the gambling industry (including the applicant casino), the reasons why that connection should not be regarded as compromising his or her independence;
 - (c) a statement by the candidate that he or she will comply with the obligations set out in the Code of Conduct for Expert Witnesses (Schedule 4 of the High Court Rules) as if references to the court were references to the Commission and references to evidence were to the report.
10. CCL submitted statements from Mr Butcher and Mr Baines and both gentlemen confirmed they will abide by the Code of Conduct for Expert Witnesses.
11. The Commission was satisfied that neither Mr Butcher nor Mr Baines have past or present relationships, associations or interests which would materially affect their views on the subject matter of the report.

Decision of the Commission

12. The Commission approved, pursuant to section 134(3) of the Act, James Baines and Geoffrey Butcher to prepare a CIR for CCL's application to renew its Venue Licence.


Graeme Reeves
Chief Gambling Commissioner
for and on behalf of the
Gambling Commission


11th November 2016

Appendix 14.10 – Christchurch Casino Charitable Trust grant recipients 2017

CHURCH AGENCIES

Christchurch City Mission: \$12,500

Christchurch Apostolic Trust: \$4,000

Total: \$16,500

COMMUNITY SUPPORT AGENCIES

Age Concern Canterbury Incorporated: \$10,000

Aviva (incorporating Christchurch Women's Refuge) Charitable Trust: \$8,000

Battered Women's Trust: \$4,000

Canterbury Men's Centre: \$3,000

Home & Family Society Christchurch: \$10,000

Kingdom Resources Ltd: \$8,000

Mental Health Advocacy and Peer Support Trust (MHAPS): \$3,000

NZ Council of Victim Supports Group Inc: \$2,000

Shakti Ethnic Women's Support Group Christchurch Incorporated: \$6,000

Tenants Protection Association (ChC) Incorporated: \$6,000

Stopping Violence Services (Christchurch) Incorporated: \$3,000
West Christchurch Women's Refuge Society Incorporated: \$2,000
YMCA Christchurch Inc: \$4,000
Total: \$69,000

EDUCATION & YOUTH AGENCIES

Big Brothers Big Sisters of Christchurch: \$4,000
Cholmondeley Children's Centre: \$10,000
Christchurch Children's Holiday Camps Trust: \$5,000
180 Degrees Trust: \$3,000
Korowai Youth Well-Being Trust: \$8,000
Life Education Trust Canterbury: \$4,000
Life Education Trust Mid and South Canterbury: \$3,000
Opawaho Trust: \$2,000
Spirit of Adventure Trust: \$5,000
Cross Over Trust: \$3,000
K2 Youth Development Trust: \$2,000
Total: \$49,000

SEXUAL & CHILD ABUSE & PRISON RELATED CHARITIES

Male Survivors of Sexual Abuse Trust: \$6,000
Project Esther Trust: \$10,000
Pillars Incorporated: \$6,000
Total: \$22,000

TELEPHONE & OTHER COUNSELLING

Caroline House: \$7,500
Lifeline Foundation Charitable Trust: \$5,000
Women's Centre Inc: \$3,000
Total: \$15,500

GRAND TOTAL FOR 2017 CCCT GRANTS : \$172,000

--ends--

For further information:
Kate Palmer
Perpetual Guardian
Christchurch
Tel: 03 924 3464

SECTION 15

CONDITIONS

GAMBLING COMMISSION

CASINO VENUE LICENCE

Section 137, Gambling Act 2003

Name of holder of casino venue licence: Christchurch Casinos Limited

Address of holder of casino venue licence: McCulloch & Partners, Chartered Accountants, Level 2, 11-17 Church Street, Queenstown, 9300, New Zealand

Address and description of casino venue: 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 15 years commencing with the date of renewal and shall then expire, unless –

- (a) The holder of the licence sooner surrenders the licence under section 147 of the Gambling Act 2003; or
- (b) The licence is sooner cancelled by the Gambling Commission under section 144 of the Gambling Act 2003; or
- (c) The licence is renewed under section 137 of the Gambling Act 2003.

Conditions

This licence is subject to –

- (a) The conditions contained in the Gambling Act 2003; and
- (b) The conditions set out in the Schedule to this licence; and
- (c) Any conditions imposed by regulations made under the Gambling Act 2003; and
- (d) Any minimum operating standards, or variation of the minimum operating standards specified by the Gambling Commission pursuant to section 141 or section 142 of the Gambling Act 2003; and
- (e) Any variation of conditions by the Gambling Commission pursuant to section 140 of the Gambling Act 2003.

Dated this ____ day of _____(date of renewal)

BY the direction of the Gambling Commission the seal)
of the Gambling Commission is hereunto affixed in the)
presence of:)

SCHEDULE – CONDITIONS ATTACHED TO CASINO VENUE LICENCE

Preamble

- 1 The following conditions apply to the Casino Venue.
- 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.
- 4 In these conditions:

Act means the Gambling Act 2003.

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 the 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 Casino Limited.

Rooftop Area includes any structures or developments on the rooftop of the Casino 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 Commission 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 of 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:
- a) the integrity and fairness of games;
 - b) the effectiveness of security and surveillance;
 - c) harm prevention, harm minimisation and responsible gambling;
 - d) potential access to the Gambling Area by persons under 20 years of age; and
 - e) compliance by any person with the Act, including section 11 of the Act.

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.

- 8 The Licence Holder shall ensure that:
- a) gambling activity is not visible from outside the Casino Venue; and
 - b) there is provision for generation of emergency power to maintain in situations of an interruption to mains power:

- (i) minimum services to the Gambling Area; and
- (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 and 4 are so activated, the areas(s) may be used to conduct casino promotions only. No other form of gambling activity is permitted in the Additional Gambling Areas.

9B The Additional Gambling Areas will take effect when the following conditions are satisfied:

- 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:

- a) effective electronic surveillance in accordance with the Surveillance Standard;
- b) an alarm device connected to the entrance of the count room which signals to the security/surveillance department whenever the door is opened;
- c) a telephone link;
- 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 the 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);
 - b) storage facilities for cage inventory;
 - c) a separate locked compartment for storage of chips and plaques held in reserve 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 applications 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;
 - b) censure or disciplinary action by a professional body for ethical misconduct;
 - c) censure in any way in relation to a casino in another jurisdiction;

- d) current investigation (other than routine or periodical inspections) by any 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, its parent company, or any subsidiaries of the Licence Holder or parent company, 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 purposes 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.