

IN THE MATTER of the Gambling Act 2003

AND the amendment by the Gambling Commission of the Host Responsibility Programme for the **DUNEDIN CASINO**

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 Decision: 7 November 2014

Date of Notification of Decision: 23 December 2014

**DECISION
ON THE AMENDMENT BY THE GAMBLING COMMISSION OF THE
HOST RESPONSIBILITY PROGRAMME FOR THE DUNEDIN CASINO**

Introduction

1. By this decision, the Gambling Commission ("**Commission**") revokes the Host Responsibility Programme ("**HRP**") that it approved for the Dunedin Casino on 12 October 2012, and approves in its place the HRP **attached** to this decision.

Process

2. Condition 29 of the licence conditions attached to Dunedin Casinos Management Limited's ("**DCML**") operator's licence provides that the Commission will review DCML's HRP every two years. The Commission's last review concluded on 12 October 2012 with decision GC28/12 revoking the then existing Programme, and approving a new HRP in its place.
3. On 4 August 2014, the Commission wrote to DCML inviting it to submit for review a draft HRP for the Dunedin Casino. The Commission received DCML's response on 15 August 2014. DCML proposed a new HRP and Problem Gambler Identification Policy ("**PGIP**") for the Dunedin Casino.
4. Potentially interested parties comprising the Secretary for Internal Affairs ("**Secretary**"), Ministry of Health ("**MoH**"), Problem Gambling Foundation ("**PGF**"), Lifeline and the Salvation Army ("**SA**"), were invited to file written submissions on the HRP and PGIP proposed by DCML. All parties did so.



5. The Commission provided a copy of the submissions filed to the other submitters, and to DCML, and invited them to file submissions in reply. Replies were received from the Secretary, PGF and DCML.
6. The Commission considered DCML's proposal and the submissions at its November 2014 meeting. The Commission identified a number of matters requiring further consideration and communicated those to DCML, before approving the HRP (and PGIP).

Jurisdiction

7. Condition 26 of DCML's operator's licence specifies the matters which must be included in the HRP for the Dunedin Casino. Condition 26 provides:

26. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
 - (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
 - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
 - (c) the provision of loss and expenditure data to individual loyalty programme members;
 - (d) identification of problem gamblers and steps to be taken following identification. This shall include, as a minimum, the following:
 - (i) an acceptable definition of problem gambling;
 - (ii) indicators of problem gambling in the gambling venue;
 - (iii) the steps to be taken by the Licence Holder in identifying problem gamblers;
 - (iv) the steps to be taken by the Licence Holder following identification of problem gamblers;
 - (e) the provision of staff training;
 - (f) the provision of exclusion, self-exclusion and limitation programmes;
 - (g) assistance to casino employees with managing the potential for personal problem gambling;
 - (h) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
 - (i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;

- (j) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
 - (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
 - (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
 - (m) standards of dress and behaviour at the Casino;
 - (n) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
 - (o) liaison with problem gambling treatment providers, community service organisations and community representatives;
 - (p) the provision of a safe gambling environment at the Casino; and
 - (q) such other matters as the Commission may require.
8. The HRP addresses the matters specified in condition 26, many of which, in turn, specify how DCML will implement obligations under the Gambling Act 2003 (the "Act") and Regulations.
9. In relation to conditions 26(d) and (f), sections 308-311 of the Act set out particular obligations relating to the identification of problem gamblers and exclusion procedures:
- (a) Section 308(1) requires the holder of a casino operator's licence to develop a programme or policy for identifying problem gamblers. A notice advising customers of the existence of this policy must be displayed and a copy of the policy made available on request.
 - (b) Section 308(4) provides that:

The persons required by subsection (1) to develop a policy for identifying problem gamblers must take all reasonable steps to use that policy to identify actual or potential problem gamblers.
 - (c) Sections 309(1) and (2) of the Act require the holder of a casino operator's licence to approach and provide information to every person identified under section 308(4) as a person whom the Licence Holder has reasonable grounds to believe is a problem gambler. The information must include a description of the self-exclusion procedure which must be made available under section 310.
 - (d) Section 309(3) provides that an exclusion order may be issued to a problem gambler identified under section 308.



- (e) Section 310 specifies when an exclusion order must be issued; namely, when requested by a person who has identified himself or herself as a problem gambler.
10. The HRP details how SCML will undertake both compulsory and discretionary activities aimed at harm minimisation, including how SCML will exercise the discretion (provided by section 309(3)) to exclude a problem gambler who has not requested exclusion, and how it will implement the self-exclusion procedure required by section 310.
11. Section 4 of the Act defines "problem gambler" as:
- A person whose gambling causes harm or may cause harm.
12. "Harm" is defined in the Act as:
- (a) means 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, civil union partner, de facto partner, family, whanau, or wider community; or
 - (iii) in the workplace; or
 - (iv) by society at large.
13. A careful examination of these provisions and definitions reveals that, for understandable reasons, the Act's obligations are not confined to a single category of persons who have been formally diagnosed as problem gamblers. Even the definition of "problem gambler" includes an element of potentiality and the Act's various 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.
14. In summary:
- (a) A problem gambler is someone whose gambling conduct has characteristics which "may cause harm". There is a sense in which any undertaking of a particular activity carries with it the potential for that activity to cause harm (in the sense that the possibility of harm being cause by an activity can only be completely excluded if the activity itself does not take place) but it is clear that the definition is not to be interpreted in that very broad way. Such an approach would eliminate any of the distinctions which the language of the Act clearly recognises (as set out below). A problem gambler, as defined, is not limited to someone whose gambling has actually caused harm but includes someone who gambles in a manner which may cause harm.



- (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 may be gambling in a manner which may cause harm.
 - (c) Of those identified as actual or potential problem gamblers, only those whom the casino operator has reasonable cause to believe to be a problem gambler (as defined) must be approached and given information.
 - (d) Any of those approached may be excluded by the casino operator for a period of up to 2 years.
 - (e) Only those who identify themselves as a problem gambler and who request exclusion must be excluded by the casino operator for a period of up to 2 years.
15. The foregoing are the minimum steps that are required to be taken under the Act. The HRP must contain the detailed steps which will ensure that those minimum requirements are met but it is also intended to be a working operational document which records what the casino operator will in fact do, including in respect of discretionary matters. For that reason, the HRP contains steps which are additional to the statutory minimum and may even contain matters which are not, strictly speaking, concerned with problem gambling but which are conveniently located with harm minimisation activities.

Approach

16. The Commission has undertaken a number of HRP reviews in the 10 years since its establishment in 2004. The Commission generally commences the process by reviewing the HRP for the Auckland casino and then applying the findings from that review to the HRPs for the other casinos. This approach has worked well for a number of reasons. The review of the Auckland HRP usually generates more extensive and more detailed submissions than the other reviews. This is not surprising given the size of the Auckland casino compared to others, and the central role that it plays in the New Zealand gambling environment. Unsurprisingly, many of the submissions made in relation to the Auckland HRP are equally applicable to the non-Auckland HRPs.
17. Also, on each occasion that the Commission has reviewed the Auckland HRP, it has been assisted by an external expert on host responsibility and problem gambling. The assistance provided by this expert has been primarily in relation to matters which are of general application and, as such, is also relevant to the non-Auckland HRPs.
18. Although the Auckland HRP is expected, for these reasons, to provide a degree of guidance to the non-Auckland casinos, the Commission does not expect the other casinos to replicate the Auckland HRP verbatim, simply to maintain uniformity. If a non-



Auckland casino proposes details in its HRP which differ from those set out in Auckland's HRP, and those details appear to be more appropriate to the specific environment or even to improve upon the Auckland approach, then the Commission will almost certainly accept them. Indeed, it is highly likely that any generally applicable improvements would be introduced to the Auckland HRP at its subsequent review.

19. As such, the HRP reviews, although relating to individual casinos, have a collective and iterative quality, with each review potentially building upon the reviews that have gone before it.
20. The Commission continued this iterative approach with its review of DCML's HRP. That is, the Commission considered DCML's proposed HRP in light of the documents that it approved for the Auckland casino in August 2013, and the documents that it approved for the Hamilton, Queenstown and Wharf casinos in August 2014, and considered whether any variations suggested by DCML, or submissions made by the consulted parties, would improve upon those documents in the Dunedin Casino context, or more generally.
21. The Secretary and PGF both encouraged this approach, submitting that DCML's HRP should closely align with the HRPs for the Hamilton and Queenstown casinos.

Major issues

22. As the HRP proposed by DCML closely followed the HRPs approved for the Hamilton and Queenstown casinos, the submissions, and the Commission's own analysis, identified only two substantive matters for discussion; namely "time spent gambling", and "gambling limitation".

Time spent gambling

23. SA submitted that the General Indicators should be amended to include a new Indicator – "gambling constantly for 4-6 hours". In its submissions in reply, PGF supported this submission. The Commission is also aware from previous HRP reviews that the Secretary is concerned about patrons who gamble continuously for extended periods of time.
24. The Commission discussed this issue in some detail when it reviewed the Auckland HRP in 2013 (see paragraphs 42-56 of decision GC21/13). Submitters, and the Commission's own external expert, Dr Paul Delfabbro, expressed the view that any period of continuous gambling longer than five hours would be a matter of concern. This is because, if a person were to gamble for this long without a proper break, it would likely extend gambling through regular meal and/or sleep times and raise questions about whether the person is using restrooms with appropriate regularity.



25. However, as noted in decision GC21/13, the Commission was reluctant to specify a precise period as defining or even illustrating continuous play. This is because the issue is complex and resolving it may not necessarily be as simple as specifying a precise period, with any gambling beyond that period leading, axiomatically, to a conclusion that a patron has gambled continuously for too long.
26. The Commission also noted that such an approach may in fact result in less vigilance, by creating the appearance of a "safe harbour", with patrons who were gambling in a problematic manner being ignored by casino staff because they have not gambled for the specified "problem" period.
27. It is important to remember that the HRP imposes an obligation to monitor customers' patterns of play, including noting periods of gambling without a break, as a possible general indicator of problem gambling. The issue is simply whether the Commission should specify a "safe" period, beyond which closer scrutiny would be required. The Commission concluded this section of decision GC21/13, in which it declined to do so, by stating that it intends to keep the issue under close consideration. The Commission confirms its intention to do so. For the reasons set out in paragraphs 16 and 17 above, it is of the view that further detailed consideration of this issue should await the next review of the HRP for the Auckland casino in 2015. At that time, the Commission expects to receive detailed submissions from interested parties, and will have the assistance of an independent expert. At that review, the Commission expects to consider whether the Auckland HRP and PGIP need to be amended to address more specifically the issue of extended continuous play, including whether these documents need to stipulate prescriptively what constitutes extended continuous play and what does not.
28. If changes are made in relation to extended continuous play for the Auckland HRP, it is likely that they will be applied to the other HRPs, including that of DCML.

Gambling limitation

29. DCML's current HRP offers VIP players a "Time Out" limitation option. Time Out allows a patron to take a break from all gambling for a period of time, such as three months.
30. DCML proposed amendments to its Gambling Limitation section; namely, to broaden its application (to make it available to all loyalty card players, rather than limiting it to VIP players only), and to relocate the Time Out option to the Exclusion section of the HRP (2.1.1). DCML did not state why it relocated Time Out to the Exclusion section, but presumably it did so after considering the Commission's comments at paragraph 74 of decision GC21/13. Paragraph 74 provides as follows:



74. Finally, the Commission considered whether to retain the Time Out option for VIP patrons and/or to introduce it for general patrons. It appeared to the Commission that the Time Out option was simply self-exclusion under another name in that it allows patrons to choose to remove themselves from the casino for a defined period of time. The Commission doubted the need for such duplication and the resulting overlap created by separate Time Out and self-exclusion options. It considered that the same outcome could be achieved more simply by amending the self-exclusion section of the HRP to include additional periods of self-exclusion for 3, 6 and 9 months. The Commission therefore proposed removing the Time Out option from section 2.1.6 and amending section 2.1.1 to provide for periods of self-exclusion of 3, 6, 9, 12 and 24 months.
31. The Commission subsequently approved similar amendments to the Hamilton and Queenstown HRPs in decision GC12/14.
32. If DCML's amendments were accepted as proposed, the HRP would retain a gambling limitation section, but it would not specify the type of limitation that would be available to patrons. The Commission sought clarification on this issue from DCML, which stated that, in addition to Time Out, it also offers its patrons a "Limited Participation" option, but it did not include this option within its written HRP. DCML stated that Limited Participation allows a patron to continue to gamble, but with money and/or time restrictions placed on their gambling, 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 money spent on site on any gaming day; or
 - a combination of the above.
33. Following discussions with the Commission, DCML stated that it would formally include the Limited Participation option in its HRP.
34. Limited Participation appeared to be an enhanced version of "Limited Play", which was formerly offered at the Auckland, Hamilton and Queenstown casinos. The Commission considered Limited Play in some detail when it reviewed the HRP for the Auckland casino in 2013. At that time, SCML proposed to remove the Limited Play option, submitting that it was not effective at the Auckland casino and was difficult to administer. SCML was instead offering its players a voluntary pre-commitment option, which allowed them to set limits on how much they could spend and for how long they could play on gaming machines. Although it doubted SCML's contention that the Limited Play option had failed to provide benefits to customers, it accepted that, on the information provided, it had not proved attractive to customers so that the benefits were limited to the small number who had taken up the option. The Commission approved the replacement of Limited Play with voluntary pre-commitment at the Auckland casino because the latter offered advantages over the former.



35. DCML provided no detail on how many customers had utilised the Limited Participation option to date, or with what results, but simply proposed to include it formally. DCML also stated that it does “not have pre-commitment as yet.”
36. The Commission considered DCML’s proposal in light of its comments in decision GC21/13. The Commission saw no reason not to approve DCML continuing to offer the Limited Participation option, despite approving the removal of a similar option at the Auckland casino, mainly because DCML does not yet have a better alternative to offer.
37. However, it appeared to the Commission that Limited Participation at Dunedin Casino appeared to have some advantages over Limited Play at the Auckland casino. First, some of the administrative issues that were present when the Auckland casino offered Limited Play would not arise for DCML as the Dunedin Casino is a significantly smaller facility. Also, Limited Participation allows a patron to have greater control over his/her gambling limitation; where Limited Play at the Auckland casino allowed a patron to limit only time, Limited Participation allows a patron at the Dunedin casino to limit time and money, or a combination of both.
38. The Commission takes this opportunity to record its dissatisfaction with DCML’s submissions on this section of the HRP, and indeed, its submissions on many of its proposed amendments.
39. DCML did not inform the Commission that it even offered Limited Participation until the Commission contacted it to discuss this section of the HRP. Further, DCML provided very little information on its rationale for any of its proposed changes, meaning that the Commission was left trying to deduce DCML’s reasons itself. Although it was largely able to do so, as the Commission assumed DCML’s changes were based upon amendments made recently to the Auckland, Hamilton and Queenstown HRPs, the situation was less than ideal and required significantly more work from the Commission than usual.
40. The Commission expects DCML to provide significantly more detail on this section of the HRP (and its entire proposed HRP) when it submits its next iteration for review in two years time. DCML’s submissions should address, at a minimum, how Limited Participation is working, whether it should continue in place or be replaced by another limitation option, whether pre-commitment will be introduced (as DCML’s submission appears to suggest) and whether any other limitation option should be introduced (either in tandem or in substitution to its proposal).
41. PGF submitted that the Time Out option should be reintroduced to the Gambling Limitation section of the HRP. This submission was entirely understandable, given DCML’s failure to mention the Limited Participation option, but now that the issue has



been clarified, and Limited Participation has been included formally, there is no need to reintroduce Time Out (especially as it is effectively located in section 2.1.1).

42. PGF also submitted that section 2.1.1 of the HRP be amended to allow patrons to self-exclude for between four and 24 months as the proposed minimum period of three months is too short to be effective. The Commission did not concur and, as noted above, the Auckland, Hamilton and Queenstown casinos all offer self-exclusion periods commencing from three months. Further, the Commission has received anecdotal feedback that the three month exclusion has been working well at the Auckland casino, so it saw no compelling reason not to allow a three month minimum at the Dunedin Casino.

Proposed drafting amendments to the HRP

43. The majority of submissions focused on specific drafting amendments to DCML's proposed documents. PGF in particular suggested a number of specific amendments to both the HRP and PGIP. The Commission considered whether these amendments would improve upon the HRP "base" established by the HRPs recently approved for the Hamilton and Queenstown casinos, and thus become part of the iterative process.

Proposed amendments accepted

44. In reply, PGF and the Secretary submitted that DCML's documents should be amended in a number of areas to incorporate drafting changes made to the Hamilton and Queenstown HRPs in decision GC12/14. For example, the Secretary submitted that section four of the PGIP should be amended to oblige DCML to identify a customer as a problem gambler "in accordance with the statutory test" (rather than "on the balance of probabilities").
45. Similarly, the Secretary submitted that DCML's indicators of problem gambling (in section two of the PGIP) should mirror those specified in the Hamilton and Queenstown HRPs.
46. The Commission concurred with PGF and the Secretary.
47. In relation to the drafting changes, the Commission made a number of small, but significant, amendments to the documents for the Auckland, Hamilton and Queenstown casinos. These amendments were designed to reflect better the obligations imposed on casino operators by the Act, and to improve the overall readability of the HRP and PGIP. These edits were appropriate for incorporation into the documents for each casino, and the Commission has done so for DCML.



48. The indicators of problem gambling were developed after considerable consultation and deliberation, and with extensive input from the Commission's external expert. The indicators were carefully categorised ("Strong Indicators", "General Indicators", "Intensity and frequency of play", "Visible emotional disturbance", "Dysfunction in social behaviour" and "Excessive access to money") with the HRP and PGIP specifying their role in assisting casino operators to identify problem gamblers. No reason to provide for local variation is apparent. The Commission was of the view that these indicators should be incorporated verbatim into the PGIP for each casino. The Commission has amended DCML's PGIP accordingly.
49. PGF and MoH submitted that section 2.4 of the HRP (Stakeholder Engagement) should be amended to allow parties other than those specified by DCML to attend the casino liaison meetings. In its reply, PGF submitted that the invitees should include PGF itself, the Police and the Dunedin City Council.
50. The Commission agreed that these meetings should not be exclusive, but did not view DCML's drafting as an attempt to prevent non-named parties from attending. However, the Commission took the opportunity to amend section 2.4 in order to clarify the issue, and to align the section better with the Hamilton equivalent.
51. MoH proposed an amendment to section 3.0 of the HRP (Monitoring & Reporting – Measures) as problem gambling service providers do not use the "South Oaks Gambling Screen" as a screening tool, rather they use the "Problem Gambling Severity Index". The Commission accepted the proposed amendments.
52. MoH also sought clarification on section 2.6.1 (Safe gambling environment – third party loans for financial gain). Under the Requirements section, DCML had stated that it would develop an undesirable behaviour SOP, but had not specified a timeframe within which it would be developed. In response, DCML stated that the SOP had since been developed, and it amended the HRP to recognise this.

Proposed amendments declined

53. PGF proposed a number of drafting amendments to DCML's documents which the Commission did not accept. It proposed amendments to section 1.2 (Programme objectives/Objectives), section 2.1 (Policies and procedures), section 2.1.1 (Exclusion/Features of the exclusion process, and Breaches), section 2.1.3 (Unattended children/Approach), section 2.1.6 (Gambling limitation/Approach, and Limitation programme), section 2.2 (Host responsibility information for customers/Customer information resources), section 2.3 (Employee gambling-related harm/Requirements), section 2.4 (Stakeholder engagement/Approach), section 2.5 (Environmental



design/Considerations, and Requirements), section 2.6.2 (Safe gambling environment – cheque retention/Requirements), section 2.7 (Responsible marketing/Requirements), section 2.8 (Display of signage and provision of information to customers/Display of signs, brochures, clocks, website, and Information on gambling activity), section 2.9 (Learning and development/Learning and development requirements), section 3.0 (Monitoring and reporting/Reports to the Gambling Commission), Appendix A – Current host responsibility resources for customers, section two of PGIP (Indicators of problem gambling/Strong indicators, and General indicators) and section five of PGIP (Record keeping/GOI files).

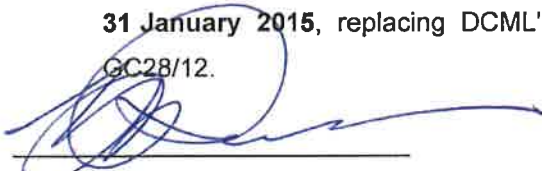
54. The Commission did not accept these proposed amendments as they would not improve DCML's documents, and were not consistent with the existing approved HRPs for the Hamilton and Queenstown casinos. For example, PGF proposed amendments to the indicators of problem gambling. The Commission rejected these amendments for the reasons specified in paragraph 48 above.
55. Additionally, some of the amendments that were proposed were in relation to matters which have previously been considered by the Commission, or which are unnecessary. For example, PGF proposed amendments to section 2.7 – Responsible Marketing, where it submitted that two requirements should be added as follows:
- Dunedin Casino will not specifically target local residents, Maori, Pacific Island, Asian or other particular ethnic or age groups when advertising gambling or gambling products; and
 - Dunedin Casino will not target older adults by providing free transport or free subsidised meals or drinks specifically for older adult customers.
56. The Commission addressed identical submissions in decision GC21/13, in which it determined that the HRP requirement for SCML not to “target groups at increased risk of experiencing gambling harm” was sufficient to ensure that groups or demographics considered to be a particular risk would not be targeted. The same requirement exists in DCML's HRP, and the Commission drew the same conclusion.
57. Similarly, PGF submitted that the “Approach” section of 2.8 (Display of signage and provision of gaming information to customers) should be amended to include a requirement that “Signs will be displayed saying that staff cannot accept tips”. This submission was rejected as the HRP already includes this requirement; it is located in a later part of section of 2.8.

Conclusion

58. The Commission specifies the HRP **attached** to this decision, including the PGIP annexed to and forming part of the HRP. These documents shall take effect from



31 January 2015, replacing DCML's HRP approved by the Commission in decision GC28/12.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

23 December 2014



Appendix A



Dunedin Casino
Host Responsibility
Programme

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Appendix A – Current Host Responsibility Resources for Customers

Appendix B - Identification Policy

1.0 Introduction

Approval Effective date: 31 January 2015

Manager:

Karen Williams
General Manager

Geoff Purdon
Compliance Manager

1.1 Statement of position

Statement of position

Dunedin Casino is committed to providing a fun and safe environment for all customers and staff.

Dunedin Casino recognises that alcohol and gambling can be associated with harm for some of its customers. Dunedin 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 staff.

Dunedin Casino intends this Programme to be a usable document for all staff which clearly sets out its obligations with respect to harm minimisation and prevention.

Compliance with legal obligations

The Programme has been developed by Dunedin Casino and addresses the host responsibility conditions in the casino operator's licence held by Dunedin Casino Management Limited.

Standard Operating Procedures (SOPs) developed by Dunedin Casino shall be consistent with and impose no lesser obligations than provided in the Gambling Act 2003 ("Act"), regulations, licence conditions or this Programme.

Dunedin Casino Code of Business Practice

The Programme contributes to Dunedin Casino's compliance with the Dunedin Casino Code of Business Practice.

1.2 Programme objectives

Objectives

The principal objectives of the Dunedin 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.

Dunedin Casino aims to fulfil these objectives by:

- providing effective staff training;
- providing a safe gambling environment;
- providing responsible marketing and promotional initiatives;
- promoting the responsible consumption of alcohol; and
- engaging effectively with stakeholders.

Outcomes

Dunedin 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

Dunedin 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;
- learning and development;
- identification of problem gamblers; and
- gambling limitation.

The Programme's requirements for each area are outlined below.

Roles and responsibilities

Frontline staff at Dunedin Casino are:

- the General Manager;
- all staff who have contact with customers (eg, Gaming, F&B, Cash Desk, Housekeeping, Customer Services, Marketing and Security); and
- Surveillance Staff.

Authorised Persons at Dunedin Casino are:

- the Security, Surveillance & Host Responsibility Manager;
- the Security, Surveillance & Host Responsibility Shift Managers;
- the Acting Security/Surveillance/Host Responsibility Shift Manager;
- Acting Security Manager;
- Gaming Manager; and
- Acting Gaming Manager.

The Host Responsibility function at Dunedin Casino is managed by the Security, Surveillance & Host Responsibility Manager. This role is responsible for the ongoing monitoring and management of Gambler of Interest ("GOI") files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff. Recording, collating and analysing all information relating to indicators of problem gambling noted by frontline staff, supervisors/managers and Authorised Persons is managed by the Security, Surveillance & Host Responsibility Manager.

References in Dunedin Casino's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility", "Host Responsibility staff" and "the Host Responsibility team" denote the function managed by the Security, Surveillance & Host Responsibility Manager.

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 Dunedin 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.

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;
- unattended children;
- underage persons;
- responsible service of alcohol;
- undesirable behaviour; and
- Agreed Limitation.

The following SOPs relate to the Problem Gambler Identification Policy:

- information Collection and Collation; and
- analysis and Intervention.

2.1.1 Exclusion

Introduction

Dunedin Casino offers two types of exclusions:

- self-exclusion; and
- Dunedin Casino identified exclusion.

Dunedin Casino provides the facility for self-exclusion of customers from the casino for any period between three and twenty four months 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 where there are multi-venue exclusion arrangements in place.

Dunedin Casino identified exclusion is for a period of two years and the customer must also meet re-entry conditions.

Dunedin Casino identified exclusion is undertaken where a problem gambler does not take up self-exclusion, and Dunedin Casino determines 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. Dunedin Casino imposes such an exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally 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. Dunedin Casino may also impose exclusion 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 staff may undertake exclusions with customers. This is generally only Host Responsibility or another Authorised Person.

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.
- 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

- Provides an updated database that is accessible to Security and Surveillance staff, as well as Gaming Managers and Acting Gaming Managers, to ensure detection of customers breaching an exclusion order.
- Promotes ongoing dialogue with counselling service providers to continually improve the exclusion process.
- Provides the customer with an opportunity to immediately redeem all loyalty points for rewards and suspends sending all loyalty information to the customers.
- Requires timely action from staff 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 opportunities for off-site self-exclusion, eg, problem gambling service providers can mail in requests for exclusions.

Breaches

Dunedin Casino staff are required to be vigilant for any excluded customer who attempts to re-enter the casino. Dunedin 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 Dunedin Casino Host Responsibility team regularly reviews the exclusion process and when necessary, makes improvements. The reviews may involve seeking customer and staff feedback through informal research processes.

Loyalty card holders

Dunedin Casino must remove from its Loyalty Programme all excluded and trespassed customers.

The Dunedin Casino Surveillance staff member responsible for the administration of the exclusion and trespass records, or the HR3 staff member undertaking the particular exclusion, must ensure that:

- Customer Services are advised within 24 hours of a Loyalty Programme cardholder being excluded or trespassed, to ensure the account is deactivated; and
- forward any surrendered loyalty card(s) to the loyalty desk.

Customer Services must:

- deactivate excluded cardholders' accounts;
- deactivate the accounts of cardholders who have been trespassed;
- deactivate from mailing lists, cardholders who are excluded or trespassed.

Loyalty cards which are deactivated are not required to be returned by the customer to Dunedin Casino. Should a customer attempt to use his/her deactivated card, it will be recorded into the Bally computer system and the customer will not accrue any loyalty points. This will assist the casino to confirm the fact that the customer was on site. Having confirmed that the customer has been excluded or trespassed, the Security Manager will take appropriate action in relation to that customer.

2.1.2 Responsible service of alcohol

Background

The Dunedin Casino Responsible Service of Alcohol Programme is designed to ensure that customers are in an environment that is safe and enjoyable. A key component is the Dunedin Casino Responsible Service of Alcohol training programme, which is designed for all frontline staff, to promote effective team work to ensure customer safety and enjoyment.

Dunedin Casino's Responsible Service of Alcohol Programme is guided by the six key principles of host responsibility (Alcohol Advisory Council of New Zealand, 2005) in licensed premises. A responsible host:

- prevents intoxication;
- does not serve alcohol to minors;
- provides and actively promotes non-alcoholic alternatives;
- provides and actively promotes substantial food;
- serves alcohol responsibly or not at all; and
- promotes safe transport options.

Approach

The following is the Dunedin Casino programme regarding the responsible service of alcohol:

- Dunedin Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Dunedin Casino will ensure that it observes the provisions of the Sale and Supply of Liquor Act 2012 ("Liquor Act") relating to the permitted hours within which customers can be sold and supplied alcohol and customers and staff are permitted on licensed premises.
- Dunedin Casino will maintain an effective responsible service of alcohol training programme to train and inform all frontline staff on the responsible sale and supply of alcohol which must be completed prior to serving alcohol.
- All Dunedin Casino frontline staff complete the responsible service of alcohol training programme during their induction as part of the HR1 Level training programme, including recognition of excessive alcohol consumption traits.
- Dunedin Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Dunedin 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.
- Staff will tactfully intervene to prevent possible problems arising from excessive alcohol consumption including, where possible, enlisting the services of staff of similar social/ethnic background to the customer.
- 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 liquor is being sold or supplied to members of the public, there is a manager or managers on duty who hold current Manager's Certificate under the Liquor Act.
- 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 Dunedin Casino must agree to abide by the Dunedin Casino Responsible Service of Alcohol Programme and procedures regarding Responsible Service of Alcohol.
- Customers may not bring alcoholic beverages onto the premises where beverage service is provided, unless prior approval has been given;
- Dunedin Casino will ensure that a reasonable range of non-alcoholic drinks is available at reasonable prices;
- Dunedin Casino will ensure that a reasonable range of low-alcoholic drinks are available.
- Dunedin Casino will ensure that a reasonable range of food is available at all times in portions suitable for a single customer, at reasonable prices, and within a reasonable time of being ordered.
- Dunedin Casino will readily provide free, comprehensive and accurate information to customers about the forms of transport available from the premises.
- Free water will always be available to customers.

2.1.3 Unattended children

Background

Dunedin Casino management does not allow children to be left unattended on any part of its premises, or surrounding environs.

Approach

Dunedin 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 unattended.

Security Officers or an Authorised Person must intervene and take all practicable steps to locate an adult responsible for an unattended child.

Security Officers or an Authorised Person must contact the Police and trespass the customer in every case where there is an absence of a reasonable explanation for the child being left unattended.

In all instances of unattended children, the Host Responsibility team must be notified as soon as practicable to follow up potential problem gambling issues.

Security Officers must patrol the car park shared by the Dunedin Casino and the Southern Cross Hotel, and surrounding environs, to detect any unattended children.

Dunedin Casino will actively investigate and take appropriate action whenever children are found unattended at the Southern Cross Hotel.

2.1.4 Underage persons

Background

Dunedin Casino is committed to keeping minors out of the casino. Dunedin Casino will rigorously enforce the prevention of underage gambling in its casino.

Approach

Dunedin 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 Dunedin Casino frontline staff must include the need to be particularly vigilant for the presence of underage persons.

Any Dunedin Casino staff member has the authority to approach suspected underage persons and seek identification for proof of age.

2.1.5 Standards of dress and behaviour

Background

Dunedin Casino must provide 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

Dunedin Casino requires a neat and tidy standard of dress. While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at Dunedin Casino:

- torn clothes;
- gang patches or other insignias;
- offensive logos;
- dirty clothes or footwear; or
- hats, caps or sunglasses (unless for religious or medical reasons).

Behavioural standards

If a customer is detected:

- under the influence of alcohol;
- abusing or threatening staff or other customers;
- causing conflict with other customers or staff;
- with hygiene issues; or
- otherwise being unpleasant,

then Dunedin Casino staff 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 Gambling limitation

Approach

The Agreed Limitation Programme, referred to as 'Agreed Limitation', is a harm minimisation initiative for all loyalty carded customers. It is available on request to all such customers. Dunedin Casino may also offer it to all such customers who are identified as being at risk of harm in the circumstances described below.

The key criteria for offering Agreed Limitation are that the customer and the casino agree that it will support the at-risk customer to gamble without experiencing harm. Participation is closely monitored and re-assessed. Where infringements occur, the casino takes appropriate action. This may include approaches to the customer and exclusion in circumstances where the customer is unable to continue gambling without experiencing harm.

Limitation programme

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.

2.2 Host responsibility information for customers

Customer information resources

Dunedin Casino produces a range of host responsibility information resources for customers. Copies of all Dunedin Casino brochures and other host responsibility information are available and displayed where appropriate in Dunedin Casino's gambling area.

This information is also supplemented and supported by the Dunedin Casino website (www.dunedincasino.co.nz) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is displayed on the Dunedin 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 Dunedin Casino's customer base.

A summary of Dunedin Casino's host responsibility resources for customers is shown in Appendix A.

2.3 Employee gambling-related harm

Introduction

Dunedin Casino is committed to developing an internal culture that proactively supports and promotes host responsibility.

Background

Dunedin Casino undertakes a range of measures concerning the potential for employee gambling-related harm that aim to:

- prevent and minimise gambling-related harm amongst Dunedin Casino employees as a result of their own, or someone else's, gambling;
- enhance the ability of Dunedin Casino staff to undertake effective host responsibility; and
- contribute to the prevention and minimisation of gambling-related harm in the community.

These measures are intended to address the operator licence condition:

'24(f) assistance to casino employees with managing the potential for personal problem gambling.'

Requirements

Dunedin 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 Dunedin Casino staff kept confidential.

Dunedin 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 staff that will be made available when required using appropriate channels, including:
 - information in the Dunedin Casino handbook for seeking help;
 - a standardised gambling screen; and
 - self-help resources to assist with early self-identification and intervention.
- Include 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 about self-assessment and self-help resources, and encourage staff to use these resources themselves to assist with early identification and intervention.

Policies and procedures

- Prohibit staff from gambling at Dunedin Casino.
- Prohibit access to online gambling sites by staff while at Dunedin Casino unless such access is required for genuine business reasons.
- Identify high risk areas for staff and target with increased levels of information.

Recruitment

- Assess all job applicants for evidence of problem gambling (via questions in job application forms).
- Decline applications from those who are identified as problem gamblers either through their screening results, or disclosure of relevant indicators (as set out in the Dunedin Casino Identification Policy) during the recruitment process and provide appropriate information, advice and assistance.
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Dunedin Casino Host Responsibility Programme.

Support for staff

- Provide assistance to staff 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 Dunedin Casino will involve problem gambling counsellors in staff induction training about the signs of problem gambling among staff and customers.

2.4 Stakeholder engagement

Background

Dunedin Casino aims to maintain constructive relationships with members of the local community.

Approach

Dunedin Casino will continue to facilitate opportunities for regular engagement to ensure local stakeholders:

- understand and are aware of Dunedin Casino's 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 Dunedin Casino's Host Responsibility Programme and harm prevention and minimisation initiatives; and
- have opportunities to participate in partnership projects on key initiatives where appropriate.

Dunedin Casino convenes a quarterly problem gambling liaison meeting to discuss host responsibility issues. These issues primarily relate to operational matters, for example, referrals and exclusions, etc. These are also opportunities to discuss broader sector initiatives.

Dunedin Casino will invite representatives from:

- treatment service providers, including problem gambling, and alcohol and other drugs;
- public health providers;
- University of Otago; and
- government agencies, including DIA and the Police.

In developing and implementing its Programme, and harm prevention and minimisation initiatives, Dunedin Casino will consider the views expressed by the attendees of the liaison meeting.

Dunedin Casino will work with class 4 organisations to maximise the effectiveness of their Host Responsibility Programmes.

Dunedin Casino also conducts other engagement activities on a routine basis, for example, hosting site visits from problem gambling service providers.

2.5 Environmental design

Approach

Dunedin 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 Dunedin 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 information resources; and
- access criteria, including dress codes and age restrictions.

Requirements

Dunedin Casino shall in its environmental design seek to ensure:

- problem/responsible gambling signage and exit points are clearly visible;
- patrons are visible to venue staff 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, Dunedin 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 – gaming machine play

Requirements

Dunedin Casino will take all reasonable and practicable steps to ensure a customer plays no more than one gaming machine at a time.

2.6.1 Safe gambling environment – third party loans for financial gain

Legislation

Under section 15(1) of the Act, Dunedin Casino is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the former Casino Control Authority (CCA) or the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided at Dunedin Casino.

Policy

Dunedin 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

- Dunedin Casino will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- Dunedin Casino will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process Dunedin Casino will maintain an Undesirable Behaviour SOP which shall explain how Dunedin Casino will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, Dunedin Casino will investigate and act in a timely manner. This process is outlined in the Dunedin Casino Undesirable Behaviour SOP.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, Dunedin 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, Dunedin 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, Dunedin Casino will issue that person with a trespass notice.
- Dunedin Casino will notify DIA Gambling Inspectors of suspected loan sharking activity in accordance with Minimum Operating Standards for Records and Notification. Where appropriate, Dunedin 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), Dunedin 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 Dunedin Casino identified exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- Dunedin Casino will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

2.6.2 Safe gambling environment – cheque retention

Policy

Dunedin Casino will when accepting cheques which it will hold unbanked by arrangement with a customer report this to Host Responsibility.

Requirements

Host Responsibility staff will monitor and record the activities of any customer whose cheque it is holding unbanked by arrangement for indicators of potential gambling harm.

2.7 Responsible marketing

Legislation and industry codes

Dunedin 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

Dunedin Casino will not pursue marketing initiatives which have any of the characteristics set out below. Where concerns are raised by third parties, Dunedin Casino will investigate and, where appropriate, take immediate action to withdraw or amend the marketing initiative.

Dunedin 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 Dunedin Casino's loyalty programme.

This process includes consultation with Host Responsibility as well as the General Manager.

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 Dunedin Casino.

A description of how Dunedin 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

Dunedin Casino has a range of information resources that are provided to customers, summarised in Appendix A.

Display of signs, brochures, clocks and website

Dunedin Casino ensures that:

- host responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of Dunedin Casino visitors;
- 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 Dunedin Casino display problem gambling helpline telephone numbers. The public telephone in the gambling area and the phone in the foyer of the Southern Cross Hotel will also have gambling helpline numbers, as will the ATM at the entry to the casino. Dunedin Casino has many brochures around the casino in a variety of languages;
- clocks are on display in the Dunedin Casino Gambling Area.

Dunedin Casino will make available an 'Odds of winning' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, eg, that the odds of winning are better than they are, that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

Dunedin 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 Dunedin Casino about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

Dunedin 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 staff cannot 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 "Odds of Winning" 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.

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.

Display of host responsibility information in open areas where there are gaming machines

Information on problem gambling and responsible gambling are displayed and made available to customers in open areas (eg, balcony) where gaming machines are present.

Information requests by customers

Customers wishing to seek further clarification of game rules will be given access to the relevant approved rules.

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-carded players will also be supplied with as much information as possible on their gambling activity.

2.9 Learning and development

Introduction

Dunedin Casino is committed to developing staff awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. Dunedin 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.

Dunedin Casino will aim to ensure its learning and development initiatives are appropriate to the needs of its customers and staff.

Dunedin Casino's learning and development resources approach employs 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 staff, and their required host responsibility customer interactions.

Overview of staff roles

Frontline staff: All frontline staff are trained to identify indicators of harm. Frontline staff are expected to refer the observation of indicators to a supervisor/manager.

All frontline staff are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Frontline staff 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 staff are trained and will approach customers themselves in circumstances, for example, where a matter is urgent or a manager/supervisor/Authorised Person is not available.

Supervisor/Manager: The supervisor/manager is the first point of contact for escalation for indicators of harm.

Supervisors/managers are responsible for ensuring that all observations of indicators reported to them by staff, and any follow up responses taken by staff, are sent to an Authorised Person. Supervisors/Managers are also responsible for providing additional information to an Authorised Person to assist with the ongoing monitoring of, and interaction with, the customer.

The supervisor/manager can also approach customers where the matter is urgent and an Authorised Person is not available.

Authorised Persons: An Authorised Person has been trained in HR levels 1-3. Authorised Persons are responsible for approaching customers and delivering interventions.

Authorised Persons are also responsible for ensuring that all observations of indicators reported to them, and any follow up responses, are logged and sent to Host Responsibility. Authorised Persons also record interactions and interventions they undertake themselves.

Authorised Persons 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 staff, supervisors/managers and Authorised Persons. It 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 staff.

Learning and development requirements

Induction training (HR1 Level)

All frontline staff must participate in two hours of classroom-based training 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.

Dunedin Casino will work to supplement this classroom-based training by ensuring that these staff 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 frontline staff will be further supplemented by on-the-job coaching and support.

Induction training will generally be classroom based.

Training for Supervisors/Managers (HR2 Level)

Supervisors/Managers from Gaming, Food & Beverage, Security and Surveillance and any other staff where it is believed it will be beneficial, will participate in supplementary Level 2 training (two hours). This training is to be undertaken within 3 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;
- support of staff who have intervened and debrief; and
- importance of reporting.

Advanced training (HR3 Level 3)

Additional training will also be given to all Authorised Persons. It is these people who will be responsible for conducting interventions with customers.

This training includes both theoretical and practical components. The training includes:

- Dunedin Casino's legal and regulatory requirements;
- identification of problem gamblers;
- intervention including brief interventions, de-escalation and motivational interviewing;
- debriefing and staff 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

Dunedin Casino provides department-based/site-wide refresher training on an ongoing basis. Refresher training is available to all frontline staff and above at Dunedin Casino. Refresher training is provided when a learning and development need is identified or requested, and for those who fail knowledge recall tests.

Dunedin Casino will provide RSA refresher training for frontline staff. Where appropriate, Dunedin Casino will work with external agencies to develop this training.

General Manager training – Sale of Liquor Act

The Licence Controller Qualification, as required by the Sale of Liquor Act, is facilitated through an external provider.

Suicide awareness training

Authorised Persons 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, Dunedin Casino provides a range of other opportunities for host responsibility learning to occur. There is an emphasis on sharing information and experiences across Dunedin Casino's portfolio to build host responsibility knowledge. These internal opportunities include:

- internal communications eg, staff newsletters; and
- inclusion in business or management processes eg, staff meetings and key performance indicators.

Evaluation

Dunedin Casino undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement. These measures include:

- staff training feedback and evaluation forms;
- staff knowledge recall and application of knowledge; and

- analysis of training needs.

2.10 Identification of problem gamblers

A copy of Dunedin Casino's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme. The policy fulfils Dunedin 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. Dunedin 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.

3.0 Monitoring and reporting

Introduction

Dunedin Casino will evaluate its performance against the objectives of the Programme.

The Dunedin 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.

As the Programme is implemented and embedded into the business, and any initiatives are developed, Dunedin Casino may seek to amend this section of the Programme, prior to the Commission's next two-yearly review.

Reports to the Gambling Commission

Dunedin 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 Dunedin Casino under the Programme;
- reporting against the measures specified below, including a comparison to previous data where applicable;
- Dunedin 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. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of observed indicators reported to Host Responsibility. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of approaches to Dunedin Casino by third parties. 	Dunedin 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. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of customers on incident spreadsheet 	Dunedin 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). 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of interventions conducted with customers. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	Dunedin 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/Dunedin Casino) timeframe following re-entry. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi venue exclusions. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi casino exclusions. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in Agreed Limitation programme. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of excluded customers agreeing to be contacted by help services on exclusion form. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of new and total customers citing casino gambling (by EGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counselling services by: <ul style="list-style-type: none"> gamblers significant others mean PGSI scores ethnicity gender age. 	MoH report	Annual
<ul style="list-style-type: none"> Mean PGSI scores of clients citing casino gambling as the primary mode who utilise face-to-face counselling services. 	MoH report	Annual

<ul style="list-style-type: none"> Number of breaches of exclusion by: <ul style="list-style-type: none"> ethnicity gender age 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of successful and unsuccessful applications to re-enter following exclusion. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff). 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of persons trespassed or required to leave for making loans for financial gain. 	Dunedin Casino	Annual
Measures relating to Responsible Consumption of Alcohol		
<ul style="list-style-type: none"> Number of "Under the Influence" incidents (internal report). 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of requests for people to leave due to the amount of alcohol consumed. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of Police contacts citing Dunedin Casino as venue where their last drink was served. 	Police Alcolink database	Annual
Measures relating to Staff Training		
<ul style="list-style-type: none"> HR1 courses HR2 courses HR3 courses Refresher training Number of staff who need to be trained in each category, and proportion of those staff who have completed the appropriate level training. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Staff perceptions of the effectiveness of the Employee Gambling Harm Programme. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Results of tests conducted by staff relating to host responsibility and associated policies and procedures. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Staff perceptions of the effectiveness of training. 	Dunedin Casino	Annual
Other Programme activity and compliance-related measures		
<ul style="list-style-type: none"> Number of internal and external underage incidents. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of unattended children. 	Dunedin Casino	Annual
<ul style="list-style-type: none"> Number of people trespassed or requested to leave the casino for other reasons 	Dunedin Casino	Annual

Appendix A – Current Host Responsibility Resources for Customers (as at December 2014)

“Responsible gambling –how to play it safe” – brochure

This brochure provides responsible gambling tips and overview of the odds of winning and player returns. It also details responsible service of alcohol, age restrictions, advertising and promotions as well as the various local gambling providers.

“Odds of winning” – brochure

This brochure provides an overview of the House Advantage for all table games and machines at Dunedin Casino. It details players expected loss on each of these games. It also gives details on Understanding the House Advantage and Superstitions and Beliefs.

“Exclusion Options-a helping hand” – brochure

The brochure outlines the exclusion process at Dunedin Casino. It details, both self-identified and casino identified exclusions, re-entry criteria and other useful information including privacy, how to obtain additional information and the fact that counselling services are available free of charge.

“Responsible Service of Alcohol Policy” – notice

This notice is prominently located in the bar area and outlines the Dunedin Casino’s Responsible Service of Alcohol Policy for customers. This includes items such as our age restrictions, the fact no one will be served if intoxicated, provision of food and alternative transport options. Additional plaques are throughout the casino advising that liquor will not be sold to intoxicated patrons.

“Gambling Hotline” – signs

Three framed signs in Chinese and Korean, outlining the fact help is available through the gambling helpline, are located in the casino, two of which are in the customer restrooms.

“Language Line Cards” – wallet cards

These cards are available to enable customers to advise staff what language they speak. To assist in interpretation the casino is able to contact the office of Ethnic Affairs.

“Asian Problem Gambling Services” – brochure

Various brochures in Korean and Chinese are available for those unable to read or understand the English brochures. There is also a separate brochure which is available in Maori.

“Policy for Identifying Problem Gamblers” – notice

Two framed notices are on the gaming floor outlining Dunedin Casino’s commitment to best practice in the provision of responsible gambling.

“Brochures from Gambling Providers” – brochures

Dunedin Casino has brochures from Salvation Army, Problem Gambling Foundation and Gambling Helpline which are displayed in three areas of the casino.

“Children at Dunedin Casino” – brochures

The brochure outlines NZ law and the measures Dunedin Casino will undertake if a child is found unsupervised in any area around the environs of the casino.

Appendix B



Host Responsibility

Problem Gambler Identification Policy

(Gambling Act 2003, sections 308-311)

Problem Gambler Identification Policy

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

Objective

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Act to enable Dunedin 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 Dunedin 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 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.

Scope of Dunedin 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 Dunedin Casino;
- a description of how indicator data is to be used by Dunedin 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:

- Information Collection and Collation;
- Analysis and Intervention;
- Exclusion; and
- Agreed limitation.

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.

Section Two - Indicators of problem gambling

Introduction

Dunedin 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.

Dunedin 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 (eg, 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 expression of suicidal thoughts.

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 (eg, meals), rushing when leaving machine or staying after friends/family leave; or
- Extreme changes in patterns of play.

Visible Emotional Disturbance

- Emotional distress including agitation, mood swings, crying, holding head in hands, or out-of-character behaviour;
- Personalising machines, including abuse of machines;
- Irritated by interruptions to gambling;
- Rudeness and complaints to staff about gambling outcomes; or
- Possessiveness of particular machines or spots at tables (eg, 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 (eg, 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 (eg, demanding drinks);
- Interaction with a known or suspected loan shark;
- Unattended children;
- Breach of an Agreed Limitation agreement; or
- Previous breach – history of barrings or exclusion orders.

Excessive Access to Money

- Leaving the casino to get additional money and coming back after having appeared to have run out of money;
- Repeated ATM visits and/or multiple declined transactions;
- Borrowing money, including begging;
- Not having sufficient money to exit car park;
- Constant demand for complements; or
- Tray-surfing.

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 staff, 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 – staff 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 Dunedin Casino collects, collates and analyses. Information sources include:

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

All information on customers collated from the sources described below is recorded as soon as practicable into iTrak, Dunedin Casino's incident reporting and retrieval database.

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

Host Responsibility use iTrak 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 (ie, 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 and sent to Host Responsibility as soon as practicable to be used in making problem gambling assessments.

BEHAVIOURAL OBSERVATIONS

Although staff 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. Staff 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, staff should remain vigilant to the presence of people who spend many hours in the casino, and who visit very frequently. In such cases, staff 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.

Staff 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 staff and any follow up responses taken by staff and/or supervisors/managers must be logged into iTrak 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). Dunedin 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 Dunedin 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, staff 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. Dunedin 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, Dunedin Casino must ascertain whether the customer is a Loyalty member. Where the customer is a member of the Loyalty Programme, Dunedin Casino will examine their data to determine:

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

Dunedin Casino will include a flag in the loyalty card data base to alert relevant staff to potential or problem gamblers on site.

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, (eg, 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 (eg, who may be a friend or relative of the inquirer). Where a third party appears to express general concern about a customer, staff must ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this must be recorded in iTrak 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 (eg, via Loyalty card use, if available or feasible) should be undertaken. If 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, Dunedin Casino must also provide to the customer problem gambling information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

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 should be treated on an urgent basis. The third party must be referred immediately to an Authorised Person 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 (eg, via Loyalty card use, if available or feasible) should be undertaken. If 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, Dunedin Casino must also provide to the customer problem gambler information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

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

INTERVIEWS WITH CUSTOMERS OR STAFF

From time-to-time, Host Responsibility, Authorised Persons or other appropriate staff may interview either customers or staff 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 iTrak and made available to Host Responsibility as soon as practicable.

Staff interviews: During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm or gambling in a way that may cause harm. This information must be recorded in iTrak 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.

Dunedin Casino must use data from the sources identified in Section 3 to identify customers who are actual or potential problem gamblers, ie where their gambling is causing harm, or may cause harm, to the customer or others. Once identified, Dunedin Casino will determine, based on direct information or inference (using indicators) whether it has reasonable cause to believe that the customer is or has been gambling in a manner that has caused harm or may cause harm.

Depending on the assessment, including the perceived severity and urgency of a situation, Dunedin Casino provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. If there is reasonable cause to believe that a customer is a problem gambler, Dunedin Casino's legal obligations under sections 309-311 of the Act are engaged immediately.

Obligation to Identify

The assessment by Dunedin Casino, 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 staff 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 staff 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 Dunedin 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 (eg, several general indicators recur during a one month period) Dunedin Casino would have reasonable grounds to consider such people to be problem gamblers.

Consequences of Identification

Once identified as a problem gambler, Dunedin Casino must as required in section 309 of the Act, offer assistance and information to the customer about problem gambling within a reasonable time of identification, taking into account the urgency of the situation and the risk of harm. As set out in section 309 of the Act, the information or advice provided must include a description of self-exclusion procedures.

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 staff, supervisors/managers, Authorised Persons, and of all direct and third party disclosures, interactions and interventions undertaken in relation to a customer by frontline staff, supervisors/managers and Authorised Persons.

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

As outlined in Section 3, all information collated by Dunedin Casino in relation to a customer is recorded as soon as practicable into iTrak.

Host Responsibility uses iTrak to manage, monitor, review and assess information about all customers on the iTrak 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; or
- a customer returns from exclusion having fulfilled the re-entry criteria.

Dunedin 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.

Dunedin Casino will regularly review GOI files at a minimum, at the following intervals and more often as required:

- monthly review for the duration of the investigation; and
- formal 12 week review.

Whenever new information becomes available or is obtained, a problem gambling reassessment must be undertaken. If an assessment is made that the customer is not a problem gambler after the 12 week review period, the GOI file is deactivated. If concerns remain, the file will be left open and reviewed on a regular basis.

All deactivated GOI files will be retained by Dunedin Casino. A GOI file may be reactivated at any stage subsequent to the 12 week 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 may continue.

Section Six – Review

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

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