

**IN THE MATTER** of the Gambling Act 2003

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

**BEFORE THE GAMBLING COMMISSION**

Members: G L Reeves (Chief Gambling Commissioner)  
P J Stanley  
L M Hansen  
R D Bell  
A K Foote

Date of Decision: 14 September 2012

Date of Notification of Decision: October 2012

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

**Introduction**

1. By this decision, the Gambling Commission ("**Commission**") amends the Responsible Gambling Programme ("**RGP**") for the Dunedin casino, approved by the Casino Control Authority and dated 24 May 2002, and approves in its place the Host Responsibility Programme ("**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 first revision was scheduled for 1 December 2008 or such later date as the Commission may approve. DCML submitted a draft HRP for consideration in July 2008.
3. The Commission is required to consult with interested parties, as appropriate, and amend the HRP as it determines, after giving the Licence Holder the opportunity to comment. Potentially interested parties comprising the Secretary for Internal Affairs ("**Secretary**"), Ministry of Health ("**MoH**"), Problem Gambling Foundation ("**PGF**"), Gambling Helpline, Salvation Army ("**SA**"), University of Otago ("**UofO**"), Otago Pacific Peoples Health Trust and Te Uru Whare Hauora Limited ("**TUWHL**") were invited to make written submissions on the draft HRP. Submissions were received from PGF and the Secretary.

4. The Secretary, PGF and DCML were invited to file submissions in reply, which they all did.
5. The Commission considered DCML's draft at its November 2008 meeting. The Commission identified a number of areas requiring further consideration and communicated those to DCML.
6. DCML submitted an amended draft which the Commission considered at its March 2009 meeting. The Commission identified further areas requiring consideration and communicated those to DCML.
7. The Commission and DCML liaised over the HRP but, before it was finalised, the Commission paused its review in order to consider the effectiveness of the HRP that was approved for the Auckland casino in December 2007.
8. The Commission recommenced its review of DCML's Programme in May 2012 by inviting DCML to submit an amended HRP for Commission consideration. The Commission received that document in June 2012.
9. Potentially interested parties comprising the Secretary, MoH, PGF, Lifeline, SA, TUWHL, Te Roopu Tautoko Ki Te Tonga and the UofO were invited to make submissions on the new draft. Submissions were received from the Secretary, MoH and SA.
10. The Commission invited DCML, the Secretary, MoH and SA to file submissions in reply, which the Secretary and DCML did.
11. The Commission considered DCML's amended draft HRP at its September 2012 meeting. The Commission identified a small number of areas requiring further consideration and communicated those to DCML, before approving the HRP.

### **Background**

12. As noted in decision GC14/12, the Gambling Commission commenced and advanced its review of the non-Auckland HRPs, following its approval of the Auckland Programme in December 2007. The review process for each HRP, including DCML's, was quite advanced, with the Commission receiving drafts (which were based on the Auckland Programme) and submissions on those drafts from interested parties. During this time, the Commission received regular updates on the effectiveness of the Auckland Programme in the form of written and oral six-monthly reports from SKYCITY Casino Management Limited ("**SCML**"). As the Commission considered these reports, it became apparent that the Auckland Programme was offering valuable on-the-ground experience and learnings that should be applied to the other five casinos. As a result, the work on

the other Programmes was paused so that the Auckland data and feedback could be taken into consideration. This pause was done with the knowledge that each casino had an existing Programme which imposed binding obligations on the operators sufficient to hold them to account if required.

13. By 2011, the Commission felt that the Auckland experience was well understood and recommenced its consideration of the non-Auckland HRPs, commencing with the SKYCITY Hamilton and Queenstown Programmes. The Commission approved new Programmes for the SKYCITY Hamilton and Queenstown casinos in May 2012, with a number of variations derived from the Auckland feedback.
14. In its decision approving the Programmes for the SKYCITY Hamilton and Queenstown casinos, the Commission stated that it would contact the Dunedin, Christchurch and Lasseters Wharf casinos and ask them to submit updated draft HRPs for Commission consideration. The Commission also stated that it would expect the drafts to closely follow the Hamilton and Queenstown HRPs, with any variances being included only to improve the documents or to recognise any differences in the size and scale between the respective casinos.
15. In May 2012, the Commission wrote to DCML inviting it to submit a new draft HRP for the Commission's consideration. DCML did so, submitting its draft in June 2012.

### **Jurisdiction**

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

17. 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.
18. 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. 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.

19. Section 308(4) provides as follows:

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.

20. 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. Section 309(3) provides that an exclusion order may be issued to a problem gambler identified under section 308, while section 310 specifies when an exclusion order must be issued.
21. The HRP specifies how DCML will exercise its discretion to exclude a problem gambler who has not requested exclusion.

### **Submissions to the Commission**

22. As noted above, the Commission received submissions in 2008 on DCML's first draft. Those submissions were of value to the Commission's consideration of that draft, but were overtaken once DCML filed an amended Programme in 2012. This decision therefore focuses on the 2012 draft and the submissions made on it.
23. As the HRP proposed for the Dunedin casino closely follows that approved for the SKYCITY Hamilton casino, the submissions, and the Commission's own analysis, identified relatively few matters that required consideration. Those matters are as follows:

#### **Section 2.0 – Harm minimisation and prevent components**

- (a) The Secretary submitted that some staff roles, such as "Authorised Person" and "Frontline Staff", should be defined in this section of the HRP as they are referred to throughout the document. In response, DCML stated that it would do so.

#### **Section 2.1.1 – Exclusion**

- (b) The Secretary noted that DCML has set its minimum period for self-exclusion at six months, whereas Hamilton set it at one year. He said that there are potential positives and negatives with different periods of exclusion, but was comfortable with six-month exclusions. He noted, however, that it may be useful to record the length of the exclusion periods and report them to the Commission as one of the measures in section 3.0. In reply, DCML stated that it would do so.

MoH submitted that casino-identified exclusions should allow for exclusions of less than two years as doing so "would allow for a graded scale of problem

behaviour to be addressed by Dunedin casino.” In reply, DCML stated that two years is an appropriate period for a casino-identified exclusion. This is because it will try and persuade a person to self-exclude but, if s/he does not do so, then a casino-identified exclusion is the only alternative. DCML stated that these people are the greatest risk and therefore, the maximum exclusion period of two years is necessary.

- (c) The Act allows for exclusions of up to two years and DCML proposed to impose the maximum period in all cases. As the Secretary submitted, every period of exclusion comes with a mixture of potential positives and negatives compared to the alternatives and, as DCML’s rationale appeared to be logical, the Commission saw no need to insist upon a different period on present information.

### **Section 2.1.1 – Exclusion**

- (d) The Dunedin Programme proposes to provide a translation service “where possible”, whereas the Hamilton Programme provides that a translation service will be provided “where necessary”. The Secretary considered it essential that a translator is made available for the exclusion of patrons who cannot understand English. In reply, DCML submitted that it wants to provide translators, but there may be rare occasions when it is not possible to do so.
- (e) The Commission noted that DCML wants to provide a translation service for any excluded patrons, but accepted that it may not always be possible for it to do so. It therefore amended the HRP to recognise this, as follows:

- [DCML] Will use all reasonable efforts to provide a translation service.

### **Section 2.1.1 – Exclusion – Features of the exclusion process – other measures**

- (f) Dunedin’s Programme provides that “security and surveillance staff” will have access to the database of excluded persons whereas Hamilton’s provides that “security and gaming staff” will have such access. The Secretary was of the view that gaming staff should have access to this database as they interact with patrons most often and, as such, should be in a position to detect patrons who breach an exclusion order. In reply, DCML stated that it will amend its Programme to clarify that the database is accessible by gaming managers, as well as security and surveillance staff. However DCML stated that it was reluctant for all gaming staff, especially junior staff, to be aware of who is excluded as they may be inclined to discuss such details outside of work.

- (g) The Commission was of the view that DCML's amendment was acceptable. It is important for gaming staff to have access to the excluded persons' database, but the matter is adequately addressed by gaming managers having such access.

#### **Section 2.1.1 – Exclusion – Features of the exclusion process – Breaches**

- (h) Hamilton's Programme states that customers discovered attempting to breach an exclusion order "may face a fine and/or prosecution", whereas DCML's omits this. The Secretary did not agree with the amendment as the omitted words inform casino staff of the additional actions that the DIA may take against customers who breach their exclusion orders. In reply, DCML stated that it will amend its Programme to note that the DIA has ability to take prosecution action if necessary.

#### **Section 2.1.1 – Exclusion – Loyalty card holders**

- (i) DCML's HRP provides that, if an excluded person attempts to use his/her loyalty card, this will be recorded in DCML's computer system. The Secretary was of the view that DCML's new computer monitoring system should be capable of more than simply recording that the card has been used. For example, he thought that it would be possible for an alert to be set, for staff to be automatically paged and for CCTV cameras to swing into position. In reply, DCML submitted that its new computer monitoring system does not allow it to do this – all it does is record the fact that an excluded person's card has been used.
- (j) The Commission was of the view that this section of DCML's Programme was acceptable. The Secretary's suggestion was for DCML to take steps over and above what other operators do, based upon DCML's new computer system. The Commission considered it preferable to align DCML's Programme with the existing approved Programmes, with any additional obligations in this area being considered when the Commission next reviews the Auckland Programme.

#### **Section 2.1.2 – Responsible Service of Alcohol**

- (k) The Hamilton HRP states that the Responsible Service of Alcohol ("RSA") Programme is designed for "all staff who work in areas where alcohol is served", whereas Dunedin's states that the RSA Programme is for "frontline staff". The Secretary was of the view that DCML's amendment lessens the types and numbers of staff that are required to receive RSA training and he considers that some back-of-house staff (such as surveillance and marketing staff) could also benefit from RSA training. In reply, DCML stated that "frontline staff" is now defined and the definition includes the General Manager of the casino and all staff

who have contact with customers. As such, DCML's RSA training actually goes further than Hamilton's.

- (l) As "frontline staff" has now been defined acceptably, DCML's drafting was adopted by the Commission.

### **Section 2.1.2 – Responsible Service of Alcohol – Approach**

- (m) The second bullet point of this section refers to "front of house employees" rather than "relevant employees" as is the case in the Hamilton HRP. The Secretary noted that the phrase "front of house employees" is undefined, and in addition, many back-of-house staff, such as surveillance and marketing staff, should also have an appreciation of the casino's duties with regard to service of alcohol. In reply, DCML stated that the phrase "front of house staff" has been replaced with the defined term, "frontline staff". DCML stated that back-of-house staff did not need to receive RSA training.
- (n) The Commission was of the view that DCML's amended proposal is acceptable. The Commission noted that some of DCML's back-of-house staff will be required to receive RSA training as some of these staff are included within the definition of "frontline staff".

### **Section 2.1.2 – Responsible Service of Alcohol – Approach**

- (o) The last bullet point on page 10 of the Dunedin HRP states that:
- ... . Any customer who is intoxicated will be removed from the premises.

In contrast, the Hamilton HRP states that.

- ... . Any customer displaying signs of intoxication will be removed from the premises.

The Secretary stated that he did not see any benefit in the amendment, and made the same submission in relation to the third bullet point on page 11, where the words "appears intoxicated" are replaced with "is intoxicated".

- (p) In reply, DCML stated that it prefers its drafting as it has had many incidents where people have displayed signs of intoxication but, when approached, staff have found that patrons were simply "fooling around, [or] had a medical condition." DCML further stated that it takes intoxication very seriously, and is renowned in the Dunedin area for being tough on this.

- (q) The Commission considered the Hamilton drafting to be preferable and amended DCML's Programme accordingly. The HRP is intended to set enforceable standards of conduct which are ascertainable in active operation, not after the event. Casino staff should be obliged to act primarily on appearances in all the circumstances.
- (r) The Commission was of the view that a patron who had a previously verified medical condition would not be displaying signs of intoxication but rather signs of the known condition.

### **Section 2.1.2 – Responsible Service of Alcohol – Approach**

- (s) The Hamilton HRP states that:

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, the customer is not served or supplied with alcohol.

In contrast, the Dunedin HRP states that:

Any customer who appears under the age of 25 may be asked for verification of identity and proof of age before being served or sold alcoholic beverages. If such identification cannot be produced, the customer may not be served or supplied with any alcohol.

The Secretary and MoH both opposed the amendment and preferred the Hamilton drafting.

- (t) In reply, DCML stated that it preferred the word "may" for a number of reasons. First, if a staff member has seen identification from a particular person in the past, it sees no need for that person to show identification to the same staff member the next time s/he requests a drink. Secondly, every person entering the casino must pass security staff at the entrance. This is a stringent process, meaning that a staff member serving alcohol has some certainty that the person they are serving is of age. If there is any doubt, the staff member is aware that s/he has an obligation to ask for identification.
- (u) The Commission considered the Hamilton drafting to be preferable and amended the HRP accordingly. The requirement to view the identification of patrons whose appearance suggests that they may be underage is standard practice at most bars and supermarkets and it is surprising that DCML would propose a lesser standard than is commonly adopted by many other businesses. If "may" replaced "is", the provision would be merely permissive and of little point in an HRP; there

would be no obligation for DCML staff to sight identification in any circumstances as any identification check would be discretionary.

- (v) Further, the same requirement is found in the HRPs for the Auckland, Hamilton, Queenstown and Wharf casinos and no convincing reason for its omission from the Dunedin HRP has been established.

### **Section 2.1.3 – Unattended children**

- (w) The Secretary noted that the Dunedin HRP should also make reference to children being left unattended in the Southern Cross Hotel and carpark as the Dunedin casino forms part of the Southern Cross building. His gambling inspectors advise him that casino patrons often stay at the Hotel and/or use its carpark. In reply, DCML stated that it prefers its drafting. It stated that the carparks are jointly used by both casino patrons and Hotel guests, and are routinely checked. Further, the rapport between Hotel staff and casino staff is such that the casino staff would be alerted immediately if a child were to be left unattended at the Hotel.
- (x) The Commission concurred with the Secretary's submission and amended the HRP accordingly. Dunedin's HRP now explicitly provides that DCML will routinely check the carpark that is shared by the Hotel and the casino, and that it will take appropriate action whenever children are found unattended at the Southern Cross Hotel.

### **Section 2.1.4 – Underage persons**

- (y) Neither MoH nor the Secretary supported DCML's amendment whereby "Any customer who appears to be under the age of 25 may be asked for verification of identity ...", whereas the Hamilton Programme provides that "Any customer who appears under the age of 25 is asked for verification of identity ...." In reply, DCML stated that it does not want any minors in the casino but has used the word "may" for the reasons identified in paragraph (t) above.
- (z) As noted in paragraph (u) above, the Commission was of the view that an obligation is preferable and amended the HRP accordingly.

### **Section 2.1.6 – Gambling limitation**

- (aa) Dunedin's HRP includes an additional sentence at the end of the fourth paragraph as follows:

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. At all times it will be at the discretion of Dunedin casino as to whether a person can participate in this programme.

- (bb) The Secretary was of the view that the additional sentence added little, but submitted that, if it were to remain, it should be extended so that it concludes with a term such as “or other intervention (such as exclusion) is necessary”. The Secretary stated that this would ensure that individuals who ask to participate in the limitation programme, but are refused, are not allowed to continue gambling at harmful levels. In reply, DCML stated that its drafting did not need alteration. It said that it always looks at exclusion prior to allowing someone to participate in a limitation programme but, to avoid “risk”, the matter should be left to its discretion.
- (cc) The Commission was of the view that DCML’s addition was unnecessary and deleted it. Participation in an agreed limitation programme should always be a decision made jointly by a patron and a casino operator; if both are of the view that participation would be beneficial to the patron, then such a programme should be implemented but, if either viewed it as being potentially problematic, the patron should be directed towards other options, such as exclusion.

### **Section 2.3 – Employee gambling-related harm – Requirements – Information resources**

- (dd) The Secretary queried why DCML did not include the requirement to make available to staff a standardised gambling screen as the Hamilton casino does for its staff. In reply, DCML stated that it will make the screen available.

Similarly, the Secretary did not see any benefit in removing the requirement to assess job applicants for evidence of problem gambling “via questions in job application forms”, which is included in the Hamilton HRP. In reply, DCML stated that it will include problem gambling questions in its job application form.

### **Section 2.4 – Stakeholder engagement – Approach**

- (ee) The Secretary stated that the list of stakeholders could be extended to include the Police, the DIA and MoH. In reply, DCML noted that the liaison meetings have focused on gambling issues, rather than issues surrounding alcohol. However, the current participants are keen to have other representatives attend, so it will amend its HRP to provide for the involvement of other attendees.
- (ff) SA noted that there is room for discussion between DCML and problem gambling service providers around areas such as responsible marketing and the

participation of providers in the staff training process. In reply, DCML stated that it is working with SA on these matters.

**Section 2.6.1 – Safe gambling environment – Third party loans for financial gain**

- (gg) MoH submitted that the words “for financial gain” should be deleted from this section as proof that a loan transaction is for financial gain can be problematic. In reply, DCML submitted that the words should remain.
- (hh) The Commission was of the view that DCML’s drafting, which mirrors the drafting in the Auckland, Hamilton, SKYCITY Queenstown and Wharf HRPs, was acceptable. The Commission may consider this matter further when it next reviews the Auckland Programme.

**Section 2.8 – Display of signage and provision of gambling information to customers – Display of signs, brochures, clocks, website**

- (ii) The Secretary noted that DCML has amended part of this section, by removing the requirement for the gaming machines and gaming tables to display problem gambling information “in a range of languages”. Further, that information is to be displayed “on or near all ATMs and public telephones.” In reply, DCML noted that it has Gambling Helpline telephone numbers on all of its tables and machines, and the public telephone on the gaming floor. It stated that it will also put these telephone numbers on the public telephone in the casino foyer and the ATM at the entrance to the casino. DCML also noted that it has many brochures around the casino which are in a variety of languages.
- (jj) The Commission was of the view that DCML provides sufficient information around the casino to allow patrons to contact problem gambling service providers, if required. Every table and machine has Gambling Helpline contact details, and DCML has a variety of other signs and brochures around the casino in different languages.

**Section 2.8 – Display of signage and provision of gambling information to customers – Display of game rules, permissible bets, payment of winning bets for table games**

The Secretary noted that DCML’s HRP does not mention that signage is displayed stating that staff cannot accept tips. In reply, DCML stated that it will include this.

**Section 2.8 – Display of signage and provision of gambling information to customers – Display of game rules, permissible bets, payment of winning bets for electronic gaming machines**

The Secretary questioned why DCML’s HRP does not include a requirement to provide a “How to Play” brochure when a customer requests information about a game. In reply, DCML stated that it has a small stock of its current “How to Play” brochures and is developing new brochures. It stated that it will therefore add an additional line to its HRP to reflect this.

**Section 2.9 – Learning and Development – Overview of staff roles**

- (kk) The Secretary noted that this section of DCML’s HRP differed from Hamilton’s in that the Hamilton HRP includes a requirement for “all staff, regardless of position, [to be] trained to identify indicators of harm”. DCML’s HRP provides that all frontline staff will receive such training.
- (ll) The Secretary opposed the amendment because all casino staff would, in his view, benefit from such training, and because the training of all staff demonstrates a collective responsibility on the part of the casino. In response, DCML stated that it will provide such training to all staff who will interact with patrons (frontline staff), but saw no need to extend that training to staff who will not.
- (mm) The Commission was of the view that operators who train all their staff, including those who will never see or interact with a casino patrons in the course of their job, should be congratulated – such training sets a “gold standard” and demonstrates an admirable commitment to collective responsibility. However, the Commission did not consider that such training was so clearly necessary as to justify its imposition and, even if other staff could benefit from it, customer safety only required training of those staff who may interact with patrons as these are the people who must be alert to any signs or problems.

**Section 2.9 – Learning and Development – Authorised Persons**

- (nn) The Secretary stated that the current definition of “Authorised Person” should be expanded to reflect more accurately the current situation at the Dunedin casino. In reply, DCML stated that it has already addressed this point by defining “Authorised Person” at the beginning of the HRP.
- (oo) As “Authorised Person” has now been defined acceptably, the Commission saw no need for additional amendment.

### **Section 2.9 – Learning and Development – Host Responsibility**

- (pp) The Secretary opposed the deletion of the words “interaction and” from the second sentence of this section, which states that “[Host Responsibility] also records interactions and interventions they undertake themselves.” In reply, DCML stated that its staff have many interactions with customers during the course of the day, and for a variety of reasons. An “intervention” is when that conversation relates to an issue of concern around the person’s gambling. It is for this reason that DCML makes no reference to “interactions” in its HRP.
- (qq) The Commission was of the view that the words “interactions and” should be included. One of the purposes of the “Overview of staff roles” section is to set out how each level of staff deals with relevant observations or indicators, including reporting them to more senior staff or taking action themselves. The requirement for Host Responsibility to record the interactions they have with a patron is part of this process – so that Host Responsibility records relevant information, including interactions, with that patron.

### **Section 2.9 – Learning and Development – Learning and Development requirements – Induction training (HR1)**

- (rr) DCML removed the requirement for the induction training to include a practical component and for staff to undertake “Follow up recall testing ... within 6-8 weeks of passing the written test”.
- (ss) The Commission was of the view that the requirement should be included, noting that it is included in other approved HRPs.

### **Section 2.9 – Learning and Development – Suicide Awareness Training**

- (tt) The Secretary noted that DCML removed the requirement for some of its staff to undertake suicide awareness training.
- (uu) In reply, DCML stated that it takes suicide awareness training seriously and touches on the issue as part of its staff training.
- (vv) The Commission was of the view that a separate and specific obligation addressing suicide awareness training should be retained within the Dunedin HRP. The requirement is found in the HRPs for the Auckland, Hamilton, SKYCITY Queenstown and Wharf casinos, and there was no apparent reason for the Dunedin casino to differ on this point. It amended Dunedin’s HRP accordingly.

### **Section 3.0 – Monitoring and Reporting**

- (ww) The Secretary viewed positively the insertion of the measures “number of customers participating in multi-casino exclusion” and “number of requests for people to leave due to the amount of alcohol consumed”.

The Commission noted that DCML did not include a number of the reporting measures in section 3. The omission was likely to be inadvertent as DCML apparently based its measures on those set out in SKYCITY Hamilton’s HRP but without the knowledge that a number of Hamilton’s measures are reported to the Commission by SCML at a group level through its Auckland Programme. The Commission therefore amended the list to include the omitted measures.

### **Appendix A – Current Host Responsibility resources for customers**

- (xx) The Secretary stated that, unlike the Hamilton HRP, the Dunedin HRP does not indicate that DCML will provide information for third parties who are concerned about someone else’s gambling, or information about children at the casino. In reply, DCML stated that people enquiring on behalf of others are directed towards the “Exclusion” or “Responsible Gambling” brochures. DCML’s reply was silent on the submission regarding children at the casino.
- (yy) The Commission noted that DCML provides brochures on “Exclusion” and “Responsible Gambling”, as well as brochures from organisations such as SA, PGF and Gambling Helpline. The Commission was therefore of the view that DCML had sufficient information to provide to concerned third parties. The Commission does, however, see benefit in DCML developing a brochure that provides information in relation to children at the casino. The Commission was therefore of the view that DCML should do so within 12 months, and report to the Commission on its completion as part of its section 3.0 reporting obligations.

### **Additional submissions by the Secretary and submissions by MoH**

24. In addition to the abovementioned specific submissions, the Secretary stated that he had general observations on the HRPs that have already been approved. He stated that his observations may add value to the Commission’s review of Dunedin’s HRP, but noted that it is within the Commission’s discretion as to how it utilises these comments.
25. These submissions on New Zealand’s Host Responsibility Programmes, which mirrored a number of submissions made by the MoH, are the same as those he made to the Commission in respect of the Wharf casino.
26. The Commission addressed these issues in decision GC27/12.

**Conclusion**

27. 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 **22 October 2012**, replacing DCML's RGP dated 24 May 2002. DCML is required to report next to the Commission in accordance with condition 29 and section 3 of the Programme, by **1 December 2013**.

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Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

October 2012



**Dunedin Casino**

**Host Responsibility  
Programme**

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*Appendix A – Current Host Responsibility Resources for Customers*

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## 1.0 Introduction

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**Approval**      Effective date: 22/10/2012

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 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

<b>Objectives</b>	<p>The principal objectives of the Dunedin Casino Host Responsibility Programme include:</p> <ul style="list-style-type: none"><li>• 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</li><li>• Facilitating responsible gambling.</li></ul> <p>Dunedin Casino aims to fulfil these objectives by:</p> <ul style="list-style-type: none"><li>• Providing effective staff training;</li><li>• Providing a safe gambling environment;</li><li>• Providing responsible marketing and promotional initiatives;</li><li>• Promoting the responsible consumption of alcohol; and</li><li>• Engaging effectively with stakeholders.</li></ul>
<b>Outcomes</b>	<p>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.</p>

## 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
- 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)
- 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;
- 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 SOP's 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
- Agreed Limitation

The following SOPs relate to the Problem Gambler Identification Policy.

- Information Collection and Collation
- 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 a period of at least six 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 Self-Exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. Dunedin Casino may also impose exclusion after serious one-off incidents where an offer of Self-Exclusion has been refused.

**Approaches to customers** Only HR3 Level 3 trained staff may undertake exclusions with customers. This is generally only Host Responsibility or Authorised Persons.

**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.
- 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 the opportunity for customers for off-site Self-Exclusion procedures, 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 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 the Loyalty programme all Excluded and Trespassed customers.

The Dunedin Casino Surveillance staff member responsible for the administration of the Exclusion and Trespass records 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;
- 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 a computer system but the customer will not accrue any Club Casino points. This will assist the Casino to confirm the fact that they were 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 customers enjoy 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 maintains an effective Responsible Service of Alcohol training programme to train and inform all frontline staff on the responsible sale and supply of alcohol.
- All Dunedin Casino frontline staff complete the Responsible Service of Alcohol training programme during 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, the customer is not served or supplied with any alcohol.
- Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of staff of similar social/ethnic background to the customers to assist in explaining the programme to customers when required.
- No person who appears intoxicated is served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another, without referral to a more senior employee.

- At all times, when liquor is sold or supplied to members of the public, there is a manager or managers on duty who hold current General Managers Certificates under the Sale of Liquor Act 1989.
- When appropriate, Dunedin Casino controls the hours of service and locations from which beverages are served.
- No complimentary alcoholic drinks will be supplied to customers participating in gaming except at the discretion of a Gaming Manager. This is not intended to prohibit normal complimentary Food and Beverage Service for customers, and does not require a customer to participate in gaming activity as a condition of service.
- Any customers invited to functions/events being hosted by Dunedin Casino must agree to abide by the Dunedin Casino Responsible Service of Alcohol Programme and procedures regarding Responsible Service of Alcohol.

### 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 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 under-age 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).

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 under-age persons.

Any Dunedin Casino staff member has the authority to approach suspected under-age 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 behave 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's Casino:

- torn clothes;
- gang patches or other insignias;
- 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 VIP Agreed Limitation Programme, referred to as 'Agreed Limitation', is a harm minimisation initiative for VIP customers. It is available on request to all VIP customers. Dunedin Casino may also offer it to VIP 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 the Agreed Limitation programme are offered a 'Time Out' programme to assist in minimising the potential for gambling harm.

'Time Out' requires the customer to take a break from all play at Dunedin Casino for three, six or nine months.

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](http://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.

**Requirements** Dunedin Casino recognises that employee gambling related harm is a sensitive issue. Accordingly, measures to promote awareness 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 through appropriate channels. They will include:
  - information in the Dunedin Casino handbook for seeking help;
  - a standardised gambling screen;
  - 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.
- 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 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.
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

Dunedin Casino currently convenes a quarterly problem gambling liaison meeting to discuss host responsibility issues. These issues relate primarily to operational issues, for example, referrals and exclusions, etc. It is attended by DIA and local stakeholders such as a health professional from Otago University, representatives from the Salvation Army Oasis Centre, Te Roopu Tautoko Ki Te Tonga and Arai Te Uru Whare Hauora Ltd. It is also envisaged that PGF will attend these meetings.

Dunedin Casino is keen to expand those attending the meeting and other organisations will be invited if their input will assist with DCML's stakeholder engagement.

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 develop 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 Department of Internal Affairs Gambling Inspectors in accordance with MOS for Records and Notification. Where appropriate, Dunedin Casino also notifies relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (ie 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.

## 2.7 Responsible marketing

**Legislation, 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, 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, e.g. 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.

<b>Display of game rules, permissible bets, payment of winning bets for Table Games</b>	<p>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 Gambling Act.</p> <p>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 that staff are unable to accept tips.</p>
<b>Display of game rules, permissible bets, payment of winning bets for Electronic Gaming Machines</b>	<p>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.</p> <p>Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, the Gaming Manager or Area Manager will explain this and can provide a "How to play" brochure are available to assist patrons.</p>
<b>Information Requests By Customers</b>	<p>Customers wishing to seek further clarification of game rules will be shown where in the gambling area copies of game rules are available.</p>
<b>Information on Gambling Activity</b>	<p>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.</p> <p>Dunedin Casino will also work to develop systems to enable it to provide information to customers who are not loyalty card players, at their request, on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.</p>

## 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, and any follow up responses taken, 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 an assessment of risk and harm. 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;
- 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 (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 2 months of commencement or promotion to a supervisor position. The training includes information on:

- Identification of problem gamblers;
- Initial action with respect to customers requesting problem gambling assistance; and
- Identification and intervention with respect to excessive alcohol consumption.

### **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.
- 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 e.g. staff newsletters;
- Inclusion in business or management processes e.g. 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;
- 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 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;
- 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 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. The first report will be provided 12 months after the Programme is notified by the Commission.

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. For its first report, Dunedin Casino will agree with the Commission on the data available to be presented (given that some of the measures specified below will require Dunedin Casino to collect new information).
- 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.
- Proposed improvements to the Programme.

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
<ul style="list-style-type: none"> <li>Number of customers about whom there have been observations.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of indicators reported to Host Responsibility.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of approaches to Dunedin Casino by third parties.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>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.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers on incident spreadsheet</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of GOI files by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> <li>Preferred mode of gambling (tables/EGMs).</li> </ul> </li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of interventions conducted with customers.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of approaches to customers to offer information about self-exclusion.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of Exclusions by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> <li>Preferred mode of gambling</li> <li>Prompted by third party disclosures</li> <li>Exclusion type (self/Dunedin Casino)</li> <li>Timeframe</li> <li>Following re-entry.</li> </ul> </li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in multi venue Exclusions.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in multi casino Exclusions.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in Agreed Limitation programme.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of Excluded customers agreeing to be contacted by help services on exclusion form.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of new and total clients citing casino gambling (by EGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counselling services by: <ul style="list-style-type: none"> <li>Gamblers</li> <li>Significant others</li> <li>Mean SOGS scores</li> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> </ul> </li> <li>Self-reported dollars lost.</li> </ul>	MoH Report	Annual

<ul style="list-style-type: none"> <li>Average SOGS scores of clients citing casino gambling as the primary mode who utilise face-to-face counselling services.</li> </ul>	MoH Report	Annual
<ul style="list-style-type: none"> <li>Number of breaches of Exclusion by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> </ul> </li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of successful and unsuccessful applications to re-enter following exclusion.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff).</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of persons trespassed or required to leave for making loans for financial gain.</li> </ul>	Dunedin Casino	Annual
<b>Measures relating to Responsible Consumption of Alcohol</b>		
<ul style="list-style-type: none"> <li>Number of "Under the Influence" (UTI) incidents (internal report).</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of requests for people to leave due to the amount of alcohol consumed.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of Police contacts citing Dunedin Casino as venue where their last drink was served.</li> </ul>	Police Alcolink database	Annual
<b>Measures relating to Staff Training</b>		
<ul style="list-style-type: none"> <li>HR1 courses</li> <li>HR2 courses</li> <li>HR3 courses</li> <li>Refresher training</li> <li>Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level training.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Staff recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Staff Perceptions on the effectiveness of the Employee Gambling Harm Programme.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Results of tests conducted by staff relating to host responsibility and associated policies and procedures.</li> </ul>	Course Evaluations	Annual
<ul style="list-style-type: none"> <li>Staff perceptions of the effectiveness of training.</li> </ul>	Course Evaluations	Annual
<b>Other Programme activity and compliance-related measures</b>		
<ul style="list-style-type: none"> <li>Number of internal and external underage incidents.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of unattended children.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Number of people requested to leave the Casino for other reasons</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>Completion of brochure addressing "Children at the Casino".</li> </ul>	Dunedin Casino	December 2013

## **Appendix A – Current Host Responsibility Resources for Customers (as at October 2012)**

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### **“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.

## Appendix B



# Host Responsibility

# Problem Gambler Identification Policy

(Gambling Act 2003, sections 308-311)

## **Problem Gambler Identification Policy**

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

### **Objective**

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Gambling Act 2003 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 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 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 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;
- An outline of record-keeping requirements and review of the Policy.

## **Supporting Standard Operating Procedures (SOPs)**

The following SOP's provide operational guidelines relevant to the Policy:

- Information Collection and Collation
- Analysis and Intervention
- Exclusion

### **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 status and the urgency of their situation.

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 likely to 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;
- 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, \$300+ 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, \$500+ lost per session) over a period of time (for example, 1 month);
- High visitation frequency combined with very high levels of expenditure on all forms of gambling, including table games, over a period of time;
- Very few breaks from gambling – almost continuous play;
- Increasing periods of play, and betting more each time, noted over a period of time (noting that gambling expenditure may reduce as the customer's financial resources are exhausted);

- Disconnect with time spent playing including missing key times, e.g. meals; rushing when leaving machine; staying after friends/family leave.

#### *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;
- Possessiveness of particular machines or spots at tables e.g. standing over other patrons, hovering, aggression.

#### *Dysfunction in Social Behaviour*

- Attempts to conceal gambling activities including making phone calls giving excuses for lateness;
- Steps apparently taken to avoid monitoring of gambling activity, such as ceasing to use a loyalty card;
- Not celebrating wins;
- Disintegration of physical appearance, e.g. clothing or personal hygiene, over time;
- Family/friends seeking out or enquiring about a customer;
- Falling asleep at the machine or table;
- Claims of malfunction of gaming machines or gaming errors;
- High consumption of alcohol while gambling, e.g. demanding drinks;
- Interaction with a known or suspected loan shark;
- Unattended children;
- Breach of an Agreed Limitation agreement;
- 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;
- Borrowing money including begging;
- Not having sufficient money to exit car park;
- 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 EGM 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 EGMs than with other forms of casino gambling;

- Electronic data gathering from EGMs 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;
- interviews with customers or staff.

### **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.
- 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.
- 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, whether from customers or third parties, must be recorded and sent to Host Responsibility 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 by the supervisor/manager and sent through to Host Responsibility. The reported observations form part of the body of information upon which assessments of problem gambling are to be made.

### **CUSTOMER DATA INCLUDING LOYALTY**

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, e.g. increase over time;
- games played;
- tier upgrades;
- non-gaming use of card, e.g. car park use;
- visitation frequency.

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.

Dunedin Casino will include a flag in the loyalty card data 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, e.g. probation officer, general practitioner, employer.

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

A third party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and will be treated on an urgent basis. The third party is referred to an Authorised Person or Host Responsibility. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue e.g. via Loyalty card use, if available or feasible, is undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Dunedin Casino shall also provide to the customer problem gambler information, including exclusion options. The action is logged and sent through to Host Responsibility, a GOI file is opened, and an investigation is undertaken.

All third party information should be corroborated as part of an internal investigation. The Exclusion SOP outlines the specific steps taken by 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. All such information must be recorded and sent to Host Responsibility.

**Staff interviews:** During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm. This information must be recorded and sent through to Host Responsibility.

## Section Four - Identification

Section 2 highlights the indicators that are taken into account in identifying whether a customer may be at risk, and the magnitude of that risk.

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 assess whether a customer is a problem gambler, ie whether his or her gambling is causing harm, or is likely to cause harm, to the customer or others. Dunedin Casino will make this determination based on information of actual harm, or by inferring (using indicators) that harm is occurring, has occurred, or likely to occur.

Depending on the perceived severity and urgency of a situation, Dunedin Casino provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. If a customer is identified as a problem gambler, Dunedin Casino's legal obligations under sections 309-311 of the 2003 are engaged.

### **Obligation to Identify**

The assessment by Dunedin Casino as to whether a customer is a problem gambler must be made in good faith, on the balance of probabilities, 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 is reported to Host Responsibility, it will 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 risk and harm assessment based on the information collated. This assessment is dynamic in nature as customers may move up and down a continuum of harm, but recognises that interventions should be provided when harm is present, suspected, or may occur in the near future. The indicators of harm along with other relevant information are weighed up and considered.

A variety of different types of information is used when undertaking a risk and harm 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 assessment that a customer is a problem gambler, with Dunedin Casino taking prompt steps to assist any person who admits to having a gambling problem, or requests assistance to control his or her gambling.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler and already subject to significant gambling-related harm.

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 assessment that the case is urgent and that the customer requires immediate assistance. As part of a graduated response, it is expected that such people should be subject to further monitoring to determine whether any further general indicators emerge, including the repetition of the same indicators. If there is an accumulation of general indicators over a period of time (e.g. several general indicators recur during a one month period) 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:

- (a) if it has not done so already, open a GOI file;
- (b) 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 will collate, analyse and electronically record all information relating to indicators of harm noted by frontline staff, supervisors, managers and Authorised Persons. Host Responsibility will also record third party disclosures, interactions and interventions undertaken in relation to a customer by frontline staff, supervisors/managers and Authorised Persons. All information obtained is recorded in hard copy/electronic form by an appointed surveillance staff member.

### **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, having analysed information relating to a customer in accordance with Section 4, Host Responsibility considers there is evidence that harm is occurring, has occurred or is likely to occur;
- a third party disclosure is made in relation to a customer's gambling;
- 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;
- 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
- formal 12 week review

When information becomes available or is obtained, a re-assessment of risk and harm will 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 reassessment of risk and harm will be undertaken, and monitoring will continue as part of the customer information review process.

## **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.