

IN THE MATTER of the Gambling Act 2003
AND the amendment by the Gambling
Commission of the Host
Responsibility Programme for the
Christchurch Casino

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
L M Hansen
W N Harvey
S C L Pearson

Date of Decision: 2 December 2019

Date of Notification
of Decision: ||| March 2020

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

Introduction

1. By this decision, the Gambling Commission ("**Commission**") revokes the Host Responsibility Programme ("**HRP**") and Problem Gambling Identification Policy ("**PGIP**") that it approved for the Christchurch Casino on 6 October 2017 and approves in its place the HRP **attached** to this decision.

Process

2. Condition 29 of Christchurch Casinos Limited's ("**CCL**") operator's licence provides that the Gambling Commission must review the HRP and PGIP for the Christchurch casino. Licence conditions for each casino were recently amended to require the Commission to review the HRPs every three years, rather than every two years. However, CCL submitted its amended documents for review within the two-year timeframe in any event. The Commission's last review of Christchurch casino's HRP and PGIP concluded in October 2017, with decision GC20/17 revoking the then existing HRP and approving a new HRP and a PGIP in its place.

3. On 10 September 2019 CCL submitted a proposed new HRP and PGIP for the Commission to review.
4. Potentially interested parties comprising the Secretary for Internal Affairs (the "**Secretary**"), Ministry of Health ("**MoH**"), Problem Gambling Foundation ("**PGF**") and The Salvation Army Oasis ("**SA**") were invited to file written submissions on the proposed HRP and PGIP. The Secretary and MoH did so. PGF and SA did not. CCL filed submissions in reply.
5. The Commission considered CCL's proposal at its December 2019 meeting. In accordance with its iterative approach to the review of the HRP, the Commission considered CCL's proposal against the documents previously approved, and considered whether any variations suggested, or submissions made, would improve this document.

Jurisdiction

6. Condition 29 of the licence conditions attached to CCL's operator's licence sets out the matters that the HRP must address, as follows:

29. 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.

7. CCL's obligations relating to the identification of problem gamblers, provision of assistance, exclusion procedures and recording keeping are set out in sections 308-312A of the Gambling Act 2003. These are summarised below:

- (a) Section 308(1) requires the holder of a casino operator's licence to develop a programme or policy for identifying problem gamblers. A notice advising customers of the existence of this policy must be displayed and a copy of the policy made available on request.
- (b) Section 308(4) requires the holder of a casino operator's licence to take all reasonable steps to ensure that the policy is used to identify actual or potential problem gamblers.
- (c) Section 309(1) requires the holder of a casino operator's licence to approach and provide certain information or advice to every person identified under section 308(4) as a person whom the Licence Holder has reasonable grounds to believe is a problem gambler. Pursuant to section 309(2)(a), the information must include a description of the self-exclusion procedure available under section 310.

- (d) Section 309(3) provides that an exclusion order may be issued to a customer who is provided with information or advice about problem gambling under section 309(1).
 - (e) Section 309A requires the casino operator to take all reasonable steps to assist anyone who did not request self-exclusion after being approached and provided with information or advice, but whose ongoing gambling or other behaviour gives rise to reasonable grounds to believe is a problem gambler. The required assistance expressly includes issuing an exclusion order, without a request to do so, in appropriate cases.
 - (f) Section 310 specifies when an exclusion order must be issued; namely, when requested by a person who has identified himself or herself as a problem gambler.
 - (g) Section 312A requires a casino operator to keep records of certain specified information about exclusions, including identifying details, the manner, date and length of the exclusion and the conditions of re-entry and provide them if requested by the Secretary.
8. The HRP details how CCL will undertake both compulsory and discretionary activities aimed at harm minimisation, including how CCL will comply with the obligation to take all reasonable steps to assist a patron who, it has reasonable cause to believe, is a problem gambler but who has not requested exclusion, and how it will implement the self-exclusion procedure required by section 310.
9. The HRP must contain the detailed steps which will ensure that those requirements are met but it is also intended to be a working operational document which records what the casino operator will in fact do, including in respect of discretionary matters. For that reason, the HRP contains steps which are additional to the statutory minimum and may even contain matters which are not, strictly speaking, concerned with problem gambling but which are conveniently located with harm minimisation activities.
- CCL's submissions**
10. CCL submitted, in summary, that its documents are now very mature and for the most part, are unchanged from the existing iteration. Aside from some minor drafting changes to improve readability and understanding, the significant changes are as follows.

HRP

- (a) **2.1.6 – Long Hours of Presence or Play** – It has amended the drafting under the “Continuous Play” subheading. The change relates to the casino’s interaction where the player will be assessed and appropriate action then taken (rather than simply encouraging the patron to take a break, as is the case at present).
- (b) **2.1.7 – Gambling Limitation** – It has removed the subsection “Agreed Limitation” as it no longer offers this. Pre-commitment, together with other monitoring, reflects what it actually does. It notes that Agreed Limitation has also been removed from the Auckland HRP.
- (c) **2.4 – Stakeholder engagement** – It has made drafting changes to make it clearer who will attend the regular Problem Gambling Liaison Meetings. The changes stem from its licence renewal hearing, where PGF in particular was keen to have the stakeholder engagement more defined. It has also incorporated some edits from the Auckland HRP for consistency.
- (d) **2.6.2 – Safe gambling environment – credit provision** – It has made minor edits to be consistent with the Auckland HRP.
- (e) **2.10 – Identification of problem gamblers** – A final paragraph has been added to be consistent with the Auckland HRP.
- (f) **Gambling-related measures** – Changes have been made to report on the measures that are consistent with those in the Auckland HRP.

PGIP

- (g) **Section One – Definition of problem gambler** – It has removed redundant paragraphs, to be consistent with the Auckland PGIP.
- (h) **Section Two – Indicators of problem gambling** – Under the “Intensity and Frequency of Play” subheading, it has included references to its Focal algorithm and loyalty data analysis for high risk visitation and high-risk expenditure over a period of time.

Submissions by the Secretary

11. The Secretary submitted, in summary, as follows:

- (a) He supports consistency across the casino sector and therefore does not object to the changes made by CCL to sections 2.0, 2.1, 2.1.1, 2.1.2, 2.1.7, 2.1.8, 2.4, 2.6, 2.10, 3.0 and Appendix A of the HRP, or to sections 1 and 2 of the PGIP.

- (b) He raised objections to other proposed changes, as follows:
- (i) **2.1.6 – Long hours of presence or play** – The inclusion of the word “carded” in the continuous play bullet point, together with the change to the “uncarded” subsection suggests that a lesser duty of care is owed to uncarded customers. In the interests of consistency across the casino sector, the current drafting should be retained.
 - (ii) **2.9 – Learning and development** – The current requirement is that induction training takes place within three months of the commencement of duties. This timeframe is too long and undermines the effect of the policy, as staff may be on the casino floor for months without being fully familiar with their responsibilities. A one-month period would bring Christchurch casino into line with the other casinos.
 - (iii) **Gambling-related measures** – He objects to the removal of the requirement to report annually on the “Number of customers participating in multi venue exclusions”. While this is not a requirement for the Auckland casino, it is a reporting requirement for the other casinos. The absence of this information from Christchurch casino would be a significant gap in the Commission’s knowledge and ability to assess the effectiveness of HRPs across the sector.

Submissions by MoH

12. MoH submitted, in summary, as follows:

- (a) **2.1.6 – Long hours of presence or play** – The focus is shifting away from *all* customers to *carded* customers. It understands that carded players are much easier to keep track of, but that does not mean that uncarded players should be ignored. The guidance for interaction with uncarded players should be the same, even if it is more work to monitor.
- (b) **2.1.7 – Gambling Limitation** – Its understanding is that with the pre-commitment system, if players reach/exceed their spend or time limit they can keep gambling, but they are no longer awarded bonus points or entries into promotions. It questions whether players are made aware that they will no longer receive these bonuses. While it is important that staff are automatically notified and are required to intervene, perhaps it would be useful if the players were also locked out of using their card for a period of time as well – for say, 24 hours.

- (c) **2.1.7 – Agreed Limitation** – CCL has removed this section completely because it does not use this tool. Self-restricting time spent gambling is a useful harm minimisation strategy and should be included in pre-commitment offerings.
- (d) **2.1.8 – Cashless gambling** – There has been a change from 'potential problem' to 'high risk' gamblers in this section. As the purpose of the policy is to 'identify actual or potential problem gamblers', does the change to 'high risk' cover the same patrons? It wants to ensure that all harm or distress of any kind is prevented and minimised, not just the most severe.
- (e) **2.7 – Responsible Marketing** – Reference is made to the "Code for Advertising Gaming and Gambling". This is now called the "Gambling Advertising Code".

CCL's submissions in reply

13. In reply to both submitters, CCL submitted as follows:

- (a) **Section 2.1.6** – It is not its intention to suggest a lesser duty of care for uncarded players. The inclusion of the same drafting from the "carded" section into the "uncarded" section was intended to make this clear. The first part of this section relates to carded play where more information is available. The paragraph for uncarded play follows immediately after, with the same standards being applied.

Following discussions with the Gambling Commission, CCL decided to remove the word "carded" in order to avoid any confusion.

- (b) **2.1.7 – Gambling Limitation** – It understands MoH's message regarding loyalty points but directs it to the 7th bullet point of the section. This shows that CCL's response is over and above what the MoH has suggested.
- (c) **2.1.7 – Agreed Limitation** – It agrees with the MoH's message – that "self-restricting time spent" is useful – but this is adequately addressed in the pre-commitment section.

As already noted, CCL also employs a range of technologies to assist it in monitoring its customers' play. It is trialling an extension of facial recognition cameras beyond just the entry so they can help identify customers who may have been in at the casino for long or for excessive periods.

It further notes that this section was removed from the Auckland HRP in 2015.

- (d) **2.1.8 – Cashless gambling** – MoH may have misunderstood the rationale for this change. The predictive algorithm, Focal, is not designed to identify actual problem gamblers; its function is to provide an output of “high risk” customers so that these may be assessed to see if their play, time on site, or other considerations give cause for concern, and then to intervene, as appropriate. The terminology “high risk” only applies in relation to the predictive algorithm as a precursor to establish those customers that it should take a look at and assess.
- (e) **2.7 – Responsible marketing – Gambling Advertising Code** – It agrees with the MoH that it should update this reference.
- (f) **2.9 – Learning and development requirements** – Level 1 induction training is currently delivered in a classroom environment whereas SKCYITY completes this training via e-learning. As such, a direct comparison between CCL and SKYCITY is unwarranted. The timeframe is currently shown as “approximately three months”, which it considers to be reasonable, but it would be happy to amend it to “within three months”. It wishes to retain the flexibility in the interim.

Also, all employees involved in serving alcohol or gambling receive induction training before they face the public on the floor; it is in CCL’s best interests for this to be the case. The transition to e-learning should be completed before its HRP is next due for review.

- (g) **Gambling related measures** – The intent in removing the “Number of customers participating in multi venue exclusions” is to be consistent with the Auckland HRP. Information regarding the effectiveness of multi-venue exclusions is available through the MVE coordinator (currently Salvation Army Oasis). Having said that, if the Commission does wish to have this in the HRPs for all casinos, it is happy to retain it.

Analysis

14. CCL proposed a small number of changes to its HRP and PGIP. Following the submission process, only a handful of issues remain unresolved between the parties; namely 2.1.6 (Long hours of presence or play), 2.1.7 (Gambling Limitation), 2.1.8 (Cashless Gambling), 2.9 (Learning and Development) and the Gambling Related Measures. Of these outstanding issues, there is effectively no dispute with either 2.1.6 (as CCL has now removed the word “carded”) or the Gambling Related Measures (as CCL has decided to retain them).

15. In relation to 2.1.7, the Secretary had no objection to CCL removing the “Agreed Limitation” section but MoH did. In reply, CCL submitted that this matter is addressed in the precommitment section in any event. The Commission agreed that no further amendment was necessary. The precommitment section of the HRP clearly provides that patrons can voluntarily set limits on how much they spend and how long they play for.
16. The MoH raised an issue in relation to a drafting change from “potential problem gamblers” to “high risk gamblers” in the concluding paragraph of section 2.1.8. The Secretary had no concerns with this change.
17. In its submissions in reply, CCL submitted that MoH may have misread CCL’s amendments in that the change of terminology relates only to CCL’s reporting to the Commission on an output of the Focal algorithm, rather than CCL applying a different standard. “High risk” is the phrase used by Focal and it is what is contained in the Auckland HRP.
18. For the reason articulated by CCL, the Commission accepted CCL’s submission on this section.
19. In relation to section 2.9, the Secretary was of the view that taking three months to complete induction training is too long, particularly as the other casinos complete it within one month. CCL submitted that it would amend the drafting to provide that the training takes place “within three months” and in doing so, noted that it is working towards e-learning, which should be operational before the next HRP review. The Commission accepted CCL’s proposal to amend its drafting as it is working towards training being undertaken within a shorter timeframe. In doing so, the Commission noted that CCL provides induction training to all of its employees who are involved in serving alcohol or gambling before they interact with the public.
20. The Commission expects CCL to provide an update on this issue as part of the next HRP review.
21. The Commission made a number of minor drafting amendments to the HRP and PGIP in order to improve the clarity of the documents.

Conclusion

22. The Commission specifies the HRP **attached** to this decision for the Christchurch Casino (including the PGIP annexed to and forming part of the HRP). These documents shall take effect from 16 March 2020, replacing the HRP approved by the Commission in decision GC20/17.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission



March 2020





CHRISTCHURCH

CASINO

HOST RESPONSIBILITY PROGRAMME
CHRISTCHURCH CASINOS LIMITED

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Appendix A – Current Host Responsibility Resources for Customers

Appendix B – Identification Policy

1.0 Introduction

Approval

Effective date: 16 March 2020

Manager:

Brett Anderson
Chief Executive

1.1 Statement of position

Statement of position

Christchurch Casino is committed to providing a fun and safe environment for all customers and employees.

Christchurch Casino recognises that alcohol and gambling can be associated with harm for some of its customers. Christchurch Casino takes its role as a responsible host seriously and recognises that it has an important role to play in preventing and minimising alcohol and gambling-related harm for its customers and employees.

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

Compliance with legal obligations

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

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

1.2 Programme objectives

Objectives

The principal objectives of the Christchurch Casino Host Responsibility Programme include:

- preventing the onset of gambling and/or alcohol related harm and minimising gambling-related harm for customers and other persons potentially affected by their gambling behaviour; and
- facilitating responsible gambling.

Christchurch Casino aims to fulfil these objectives by:

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

Outcomes

Christchurch Casino intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol-related harm to those customers who may be at risk. Reporting requirements relating to achievement of Programme objectives are set out in section 3.

2.0 Harm minimisation and prevention components

Introduction

Christchurch Casino will focus on addressing underlying causes of gambling and alcohol-related harm as well as taking steps to minimise harm. Harm prevention and minimisation initiatives will be undertaken in the following areas:

- policies and procedures;
- host responsibility information for customers;
- employee gambling-related harm;
- stakeholder engagement;
- environmental design;
- provision of safe gambling environments;
- marketing practices;
- display of signage and provision of gaming information to customers;
- employee learning and development;
- identification of problem gamblers;
- gambling limitation; and
- technology.

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

Roles and responsibilities

The host responsibility function at Christchurch Casino is a shared task with all frontline employees able to provide input. Frontline employees comprise any casino venue employee who is in direct contact with players in the course of his or her duties at the casino venue.

The host responsibility function is managed by the Host Responsibility Executive. It is supported by senior managers including:

- Chief Executive Officer;
- Asset Protection & Responsible Gambling Manager;
- Risk and Compliance Manager;
- Food and Beverage Manager;
- Gaming Manager; and
- VIP Manager.

The Host Responsibility Executive manages the Host Responsibility Team, which performs the on-going day to day monitoring and management of Gambler of Interest (GOI) files, provides feedback, advice, support and training to employees, reviews new information on GOI files and maintains the GOI records. The recording, collation and analyses of all information relating to indicators of problem gambling noted by frontline employees, supervisors and managers is also managed by the Host Responsibility Executive.

Reference in Christchurch Casino's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility" denotes the function managed by the Host Responsibility Executive.

2.1 Policies and procedures

Policies and procedures

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of the Christchurch Casino's Host Responsibility Programme. The policies and procedures are consistent with the Act, regulations, licence conditions and this Programme, and will be updated to reflect changes.

Policies:

- Problem Gambler Identification Policy; and
- Responsible Service of Alcohol Policy.

Standard operating procedures:

The following SOPs relate to harm prevention and minimisation activities. An overview of how these procedures are put into practice is shown below:

- Exclusion and re-entry;
- Unaccompanied children;
- Underage Persons;
- Responsible Service of Alcohol;
- Long periods of play;
- Undesirable Behaviour;
- Gambling Limitation; and

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation;
- Analysis and Intervention; and
- Exclusion and Re-entry.

2.1.1 Exclusion

Introduction

Christchurch Casino offers two types of exclusions:

- Self-Exclusion; and
- Casino-Exclusion.

Christchurch Casino provides the facility for self-exclusion of customers from the casino for an appropriate period of up to two years, dependent on their circumstances, and until they meet re-entry conditions. A customer may request and undertake self-exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler, or where the customer chooses to prevent or limit opportunities for harm to occur. The self-exclusion process may also be initiated by problem gambling treatment providers or other venues under a multi-venue exclusion arrangement.

Casino exclusion is for an appropriate period of up to two years and the customer must also meet re-entry conditions.

Casino exclusion is undertaken where a problem gambler does not take up self-exclusion, and Christchurch Casino considers that the customer or his or her family or wider community is, or may be experiencing harm as a consequence of that person's gambling behaviour. If Christchurch Casino has reasonable grounds to suspect, as a result of ongoing gambling or other behaviour, that the customer is a problem gambler (as defined by the Act), it must take all reasonable steps to assist the customer, including issuing a casino exclusion in appropriate cases¹. These decisions are made on the basis of assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of a self-exclusion offer or other host responsibility efforts to assist the customer to gamble without harm, but a casino exclusion may be imposed after a serious one-off incident where an offer of self-exclusion has been refused.

Conditions for re-entry are contained in the Exclusion and re-entry SOP.

Approaches to customers

Only appropriately trained employees undertake exclusions with customers. This is generally only Host Responsibility, Security or Gaming Shift Managers.

Features of the exclusion process

To ensure the effectiveness of the exclusion process, the following are features of the process:

Communication

- Will use all reasonable efforts to provide a translation service where necessary.
- Provides support to excluded customers through provision of materials from problem gambling counselling service providers and contact details.
- Provides brochures in appropriate languages.

Third parties and service providers

- Emphasises culturally appropriate processes and, wherever possible and appropriate, encourages families and/or friends to accompany the customer.

¹ Section 309A

- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the excluded customer and during any discussion relating to re-exclusion or re-entry.
- Encourages the excluded customer to nominate a counselling service.
- Arranges for the counselling service to call the excluded customer, if the excluded customer agrees.
- Encourages the excluded customer to make contact with the counselling services as soon as possible after their exclusion.

Other measures

- Maintains up to date GOI records, including full details of all exclusion orders made, accessible to Security, Surveillance and Gaming employees to ensure detection of customers breaching an exclusion order. The GOI records must be adequate to ensure that the obligations under section 312A are met.
- Promotes ongoing dialogue with counselling service providers to continually improve the exclusion process.
- Takes action to suspend sending all loyalty information to the customer.
- Requires timely action from employees if a customer approaches requesting self-exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone.
- Provides the opportunity for off-site self-exclusion procedures (e.g. self-exclusion forms are held by problem gambling service providers and can be completed at home).

Breaches

Christchurch Casino employees are required to be vigilant for any excluded customer who attempts to re-enter the casino. Facial Recognition (FR) technology is also employed to assist with the detection of banned persons. Christchurch Casino Security Managers enforce the exclusion process and take action against those detected committing a breach of the exclusion process. Customers discovered attempting to do so may be warned, further excluded for an additional period or issued a Trespass Notice. The Department of Internal Affairs (DIA) is notified of all breaches by excluded customers and has the ability to take prosecution action if deemed necessary.

The Risk and Compliance Manager in consultation with the Host Responsibility Executive regularly reviews the exclusion process and when necessary, makes improvements, in alignment with company policy. The reviews may involve seeking customer and employee feedback through informal research processes.

Loyalty card holders

Christchurch Casino will disable membership from its Loyalty programme for all excluded, trespassed and/or customers formally requested to leave the premises.

The Security/Surveillance employee responsible for the administration of the exclusion and trespass records must ensure that:

- the Host Responsibility Executive, the Host Responsibility Team and Gaming Department are advised within 24 hours of a Loyalty programme cardholder being excluded or trespassed, or formally requested to leave the premises; and
- forward any surrendered loyalty card(s) to the Customer Services desk.

The Surveillance Operator or Customer Services must:

- deactivate excluded cardholders' accounts;
- deactivate the accounts of cardholders who have been trespassed or formally requested to leave the premises; and
- deactivate from mailing lists, cardholders who are excluded, trespassed or formally requested to leave the premises.

Loyalty cards which are deactivated are not required to be returned by the customer. Should a customer attempt to use his/her deactivated card, an error message will appear. Having confirmed that the customer has been excluded, trespassed or formally requested to leave, Customer Services will contact Security and appropriate action will be taken in relation to that customer.

2.1.2 Responsible service of alcohol

Background

Christchurch Casino is committed to being a responsible host. We take pride in delivering an environment that is safe, responsible and fun for our guests and employees to enjoy. A key component is the Christchurch Casino responsible service of alcohol training programme, which is designed for all frontline employees, to promote effective team work to ensure customer safety and enjoyment.

The Christchurch Casino Responsible Service of Alcohol Policy is developed as our response to the requirements of the Sale and Supply of Alcohol Act 2012 and is guided by the key principles of Host Responsibility (Health Promotion Agency, 2014) in licensed premises.

Our objectives, as a responsible host, are:

- to prevent intoxication;
- to serve and manage alcohol responsibly;
- to provide and actively promote substantial food options as well as low and non-alcoholic beverage alternatives;
- to promote and market in a way that doesn't encourage excessive alcohol consumption;
- to prevent minors from entering our premises;
- to prevent intoxicated persons from entering or remaining on our premises;
- to promote and arrange safe transport options;
- to provide responsible service of alcohol training for all employees; and
- to work with the community, regulators, industry and other external agencies to contribute to a reduction in alcohol related harm.

Approach

The following is the Christchurch Casino's programme regarding the responsible service of alcohol:

- Christchurch Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Christchurch Casino will ensure that it observes the provisions of the Sale and Supply of Alcohol Act 2012 and the Gambling Act relating to the permitted hours within which customers can be sold and supplied alcohol, and customers and staff are permitted on licensed premises.
- Christchurch Casino maintains an effective Responsible Service of Alcohol Training Programme to train and inform all frontline employees on the responsible sale and supply of alcohol which must be completed prior to serving alcohol.
- All Christchurch Casino frontline employees complete the Responsible Service of Alcohol Training Programme during their induction as part of the basic level training programme, including recognition of excessive alcohol consumption traits.
- Christchurch Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Christchurch Casino takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
- Any customer who appears under the age of 25 is asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, that customer is not served or supplied with any alcohol.

- Employees tactfully intervene to prevent possible problems arising from excessive alcohol consumption including, where possible, enlisting the services of employees of similar social/ethnic background to the customer to assist in explaining the programme to the customer when required.
- No person who appears intoxicated is served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another, without referral to a more senior employee.
- At all times, when alcohol is being sold or supplied to members of the public, there is a manager or managers on duty who hold a current Manager's Certificate under the Sale and Supply of Alcohol Act 2012.
- When appropriate, Christchurch Casino controls the hours of service and locations from which beverages are served.
- No complimentary alcoholic drinks will be supplied to customers participating in gaming except at the discretion of a Gaming Manager. This is not intended to prohibit normal complimentary Food and Beverage Service for customers, and does not require a customer to participate in gaming activity as a condition of service.
- Any customers invited to functions/events being hosted by Christchurch Casino must abide by the Christchurch Casino Responsible Service of Alcohol Programme and procedures regarding responsible service of alcohol.
- Free water will always be available to customers.

2.1.3 Unaccompanied children

Background

Christchurch Casino management does not allow children to be left unaccompanied on any part of its premises or surrounding environs.

Approach

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

Employees must report to Security any incident where it is apparent that a child has been left unaccompanied.

Security and/or other senior managers must intervene and take all practicable steps to locate an adult responsible for an unaccompanied child.

Security and/or other senior managers must contact the Police and trespass or Casino exclude the customer in every case where there is an absence of a reasonable explanation for the child being left unaccompanied.

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

Security Officers will patrol the Casino car parks and surrounding environs to detect any unaccompanied children.

2.1.4 Underage persons

Background

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

Approach

Christchurch Casino must take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gambling facilities (currently 20 and over).

Any customer who appears under the age of 25 is asked for verification of identity and proof of age before being permitted to enter the casino.

Training for Christchurch Casino frontline employees includes the need to be particularly vigilant for the presence of underage persons.

Any Christchurch Casino employee has the authority to approach suspected underage persons and seek identification for proof of age.

2.1.5 Standards of dress and behaviour

Background

Christchurch Casino provides a comfortable environment where customers are able to enjoy their surroundings without disruption from others who are inappropriately dressed or behaving in an unacceptable manner.

Dress code

A smart and neat presentation is required at all times and management reserves the right to refuse entry. What is deemed appropriate is a management decision which is reviewed periodically to reflect seasonal changes, fashion and any event being held.

Behavioural standards

If a customer is detected:

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

then Christchurch Casino employees must:

- take appropriate steps to stop the behaviour; or
- in appropriate circumstances, have the customer escorted from the premises.

Customers exhibiting undesirable behaviour may be trespassed or excluded.

2.1.6 Long Hours of Presence or Play

Continuous Presence

Continuous Presence is where a customer is present at the casino (but not necessarily gaming continuously) for a period of 12 hours or more. The "clock" is reset after a customer has had a break from being present at the casino for six hours or more.

As a minimum:

- when a customer has been observed to be continuously present at the casino (but not necessarily gaming continuously) for 12 hours, the observing staff member must notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- At the very least, in the course of the interaction, the customer must be encouraged to take breaks and Gaming Staff and/or Host Responsibility must thereafter continue to monitor the customer (which may include subsequent interactions or interventions with that customer).
- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.
- When a customer has been continuously present at the casino (but not necessarily gaming continuously) for 24 hours and, provided that no action has already been taken under the Act, the Policy or this Programme:
 - local customers must be requested to leave the casino for at least 24 hours;
 - international VIP customers must be assessed by Host Responsibility to determine whether they should be allowed to remain.

If one or more of the strong indicators is observed, Host Responsibility or Gaming Staff must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been present.

All interactions, observations and assessments must be logged in Christchurch Casino's computerised Incident Reporting and Risk Management System.

Continuous Play

Continuous Play is where a customer is gaming continuously for five hours or more. The clock is reset after a customer has had a break from gaming of at least 30 minutes (in aggregate).

As a minimum:

- When a customer has been observed to be continuously gaming for five hours without a break of at least 30 minutes (in aggregate), the observing staff member will notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- At the very least, the customer is approached with an emphasis on customer care. If during the interaction the customer gives staff cause for concern, staff will encourage breaks or take stronger measures as required under the Act, the Policy and this Programme. Gaming Staff and/or Host Responsibility must thereafter continue to monitor the customer (which may include subsequent interactions with that customer).

- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.
- When a customer has been gaming continuously with a loyalty card for 10 hours (without an aggregate break of at least 60 minutes) and, provided that no action has already been taken under the Act, this Programme or the Policy:
 - local customers must be requested to leave the casino for at least 24 hours; and
 - international VIP customers must be assessed by Host Responsibility to determine whether their play should be permitted to continue or not.

If one or more of the strong indicators is observed, Host Responsibility or Gaming Staff must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been on site.

All interactions, observations and assessments must be logged in Christchurch Casino's computerised Incident Reporting and Risk Management System.

Uncarded

Although ascertaining the length of "continuous presence" and players "continuous play" for uncarded players relies upon observation rather than a system record, if staff become aware of uncarded players being "continuously present" or undertaking "continuous play" for the periods set out above, they must report their observation to Gaming staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with those customers so that these uncarded players are treated as set out above.

CCL also uses technology (Servizio) to help ensure the above policy is maintained by monitoring both carded and uncarded play for continuous presence and/or continuous play.

2.1.7 Gambling Limitation

Pre-Commitment

Christchurch Casino offers customers a voluntary Pre-Commitment system which allows customers to voluntarily set limits on how much they spend and how long they play for on gaming machines. Customers receive an automated warning message when they reach 80% of their set limit with a further notification when 100% is reached. Should the customer reach their limit they are no longer awarded bonus points or entries into promotions.

Should the pre-commitment limit be reached an automated message is sent to gaming staff who will intervene with the customer if they are still on site.

Breaches of pre-commitment limits and multiple increases or disabling of pre-commitment limits are general indicators of potential problem gambling. Security, Gaming Shift Managers and Host Responsibility will proactively encourage the use of this system, where appropriate, during interactions with patrons.

The features of the voluntary Pre-Commitment system include:

- access to the Pre-Commitment facility via Christchurch Casino's loyalty card;
- each time the loyalty card is inserted, the Pre-Commitment facility will be activated;
- the system will allow players to define their own limits for:
 - time limit; and
 - spend limit;
- enrolment for pre-commitment can occur at either:
 - the gaming machine by the player; or
 - a loyalty member's workstation;
- an "approaching limits" and "reached limits" notification will be displayed on the gaming machine;
- if limits are relaxed, then the new limits must not be available to the player for a period of 24 hours;
- once the limit is reached, no more loyalty points may be accumulated or entries to promotions earned and the player will be asked to finish up their gambling and leave;
- the Host Responsibility Executive must be alerted once limits are breached, increased or disabled;
- no loyalty points can be earned by a player for the 24 hours following a limit being reached; and
- the system will provide information, support and advice to the operational business units.

2.1.8 Cashless Gambling

Christchurch Casino provides for cashless EGM play. This play may be facilitated by a Secure Electronic Transfer (SET) for loyalty club members (carded play) and Ticket based transactions e.g. TITO (Ticket In Ticket Out). Cashless play has the following transaction limits as set out in the gazetted Minimum Cashless Technical Requirements for Printed Ticket-In Ticket-Out and Player Loyalty Account-Based Cashless Gambling Technology.

General Limits:

A kiosk can, for equivalent cash in any one transaction:

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

A gaming machine, electronic table game or table game redemption device can for equivalent cash in any one transaction:

- either by ticket acceptance or a player loyalty cashless account, transfer/accept cash equivalent credits for play up to a maximum of \$5,999;
- print or issue a single ticket up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay; and
- transfer any credits to a player account up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay.

Limits in Restricted Areas:

A kiosk can, for equivalent cash in any one transaction:

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

A gaming machine, electronic table game or table game redemption device can for equivalent cash in any one transaction:

- by ticket acceptance, transfer/accept cash equivalent credits for play;
- up to a maximum of \$5,999;
- transfer/accept unlimited cash equivalent credits from a player loyalty cashless account;
- print or issue a single ticket up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay; and
- transfer unlimited credits to a player loyalty cashless account.

Christchurch Casino has a range of measures to minimise any potential harm from the use of cashless gambling:

- enhanced automated monitoring (Servizio) to include greater scrutiny of EGM play;
- CCL continues to develop an early identification of problem gambling algorithm with the aim of creating a predictive model using loyalty data;

- enhanced staff awareness of the risks associated with cashless gambling;
- provide the following details to the Gambling Commission as part of its annual HRP reporting:
 - the number of patrons using SET for EGM play;
 - the number of patrons identified as potential problem gamblers as a result of changes to their patterns of play after using SET;
 - the number of patrons identified as high-risk gamblers through the application of the predictive algorithm.

2.2 Host responsibility information for customers

Customer information resources

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

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

There is an ongoing process of review and development of resources for customers.

Information resources are translated into a variety of languages consistent with the cultural make-up of Christchurch Casino's customer base.

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

2.3 Employee gambling-related harm

Introduction

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

Background

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

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

Requirements

Christchurch Casino recognises that employee gambling-related harm is a sensitive issue. Accordingly, measures to promote awareness and encourage and support help-seeking will be discreet and interventions with Christchurch Casino employees kept confidential.

Christchurch Casino will undertake the following to provide assistance to casino employees with managing the potential for personal problem gambling:

Information resources

- Develop supporting resources for employees that will be made available when required. They will include:
 - information in the Christchurch Casino handbook for seeking help;
 - a standardised gambling screen; and
 - self-help resources to assist with early self-identification and intervention.
- Incorporate information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in host responsibility training programmes and in the EAP Services (employee assistance) Programme.
- Promote awareness and information about self-assessment and self-help resources, and encourage employees to use these resources themselves to assist with early identification and intervention.

Policies and procedures

- Prohibit employees from gambling at Christchurch Casino or Dunedin Casino.
- Prohibit access to online gambling sites by employees while at Christchurch Casino (unless work related).
- Identify high risk areas for employees and target with increased levels of information.

Recruitment

- Assess all job applicants for evidence of problem gambling.
- Assess applications from those who it believes may be problem gamblers, or who disclose relevant indicators (as set out in Christchurch Casino's Problem Gambler Identification Policy) during the recruitment process and then provide appropriate information, advice and assistance.
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Christchurch Casino Host Responsibility Programme.

Support for employees

- Provide assistance to employees who are experiencing gambling-related harm including:
 - identification;
 - intervention;
 - referral to confidential support through the EAP Services Programme and/or a problem gambling treatment provider;
 - confidentiality; and
 - wherever possible Christchurch Casino will involve problem gambling counsellors in employee induction training about the signs of problem gambling among employees and customers.

Engagement

- Work with Class 4 organisations to maximise the effectiveness of its Host Responsibility Programme.

2.4 Stakeholder engagement

Background

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

Approach

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

- understand and are aware of its Host Responsibility Programme;
- are able to continue to raise and discuss operational issues in relation to host responsibility;
- continue to have opportunities to provide input into Christchurch Casino's Host Responsibility Programme and harm prevention and minimisation initiatives; and
- have opportunities to participate in partnership projects on key initiatives where appropriate.

Christchurch Casino currently convenes regular problem gambling liaison meetings to discuss host responsibility issues. These issues relate primarily to operational activities, for example, referrals and exclusions, etc. These are also opportunities to discuss broader sector initiatives.

Christchurch Casino will invite relevant stakeholders and representatives from the community including:

- local Ministry of Health approved treatment providers, (including Salvation Army Oasis Centre, and the Problem Gambling Foundation);
- Christchurch City Council; and
- government agencies (including DIA and the Police).

The above membership list is not definitive and will be kept under review to maintain relevance to Christchurch Casino's current or evolving policies and practices.

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

Christchurch Casino also conducts other engagement activities, for example, hosting site visits from problem gambling service providers, engaging with community boards, and is an active member on the local community.

Christchurch Casino will work with surrounding Class 4 (pubs and clubs) venues to maximise the effectiveness of their Host Responsibility Programmes.

2.5 Environmental design

Approach

Christchurch Casino's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol.

Considerations

In considering the impact of any proposed changes, the key objectives are to ensure that environmental features:

- contribute to harm prevention, or have a neutral impact on harm;
- encourage responsible gambling and alcohol consumption choices;
- do not contribute to the onset of harm or exacerbate risk; and
- facilitate effective host responsibility, particularly early identification and intervention.

This approach applies to the following Christchurch Casino areas:

- floor lay-out, furnishing and design;
- casino electronic gaming machine and table game location;
- access to cash;
- game and equipment features;
- environments adjacent to the Gambling Area, including access to other entertainment options;
- physical location and presence of Security and Host Responsibility;
- location of problem gambling and other information resources; and
- access criteria, including dress codes and age restrictions.

Requirements

Christchurch Casino shall in its environmental design seek to ensure:

- problem/responsible gambling signage and exit points are clearly visible;
- patrons are visible to venue employees in the Gambling Area;
- machine alleys with no exit point and in dimly lit corners are avoided;
- Gambling Area is well lit, utilising natural light where appropriate;
- clocks are visible in the Gambling Area; and
- other non-gambling entertainment options are available.

Other regulatory processes

All applications for construction or design changes to Gambling Area must be approved by the Gambling Commission. As part of any such application, Christchurch Casino assesses any impacts the alterations may have on harm prevention and harm minimisation. The impact of any proposed design change on gambling harm is assessed in determining the suitability of any such proposal prior to making applications to the Commission.

2.6 Safe gambling environment

Approach

Christchurch Casino's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and or responsible consumption of alcohol.

Considerations

In determining what a "safe environment" means Christchurch Casino has drawn from the relevant definitions within the Gambling Act. These include:

- facilitating responsible gambling that is;
 - (a) lawful, fair, and honest; and
 - (b) conducted—
 - (i) in a safe and secure environment; and
 - (ii) without pressure or devices designed to encourage gambling at levels that may cause harm; and
 - (iii) by informed participants who understand the nature of the activity and do not participate in ways that may cause harm;
- to limit opportunities for crime or dishonesty associated with gambling;
- to prohibit gambling on credit other than as approved by the Gambling Commission; and
- to take all practicable steps to prevent loan transactions by third parties for financial gain i.e. to protect customers from illegal or oppressive loan activity, or "loan sharking" as it is known.

Should these events occur, Christchurch Casino will undertake an investigation and document the findings, together with any action taken, in Christchurch Casino's Incident Reporting and Risk Management System (I-Trak).

Requirements

Christchurch Casino will:

- take all reasonable and practicable steps to ensure a safe environment is maintained including that customers play no more than one gaming machine at a time;
- report, as appropriate, any suspicious or unusual transactions to regulatory agencies.

2.6.1 Safe gambling environment – third party loans for financial gain

Legislation

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

Policy

Christchurch Casino does not permit loan transactions by third parties for financial gain at the casino, except as approved by the Casino Control Authority or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or "loan sharking" as it is known.

Requirements

- Christchurch Casino will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- Christchurch Casino will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process Christchurch Casino will maintain an Undesirable Behaviour SOP which shall explain how Christchurch Casino will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino employees observe suspicious behaviour or information is presented from external parties regarding loan activity, Christchurch Casino will investigate and act in a timely manner. This process is outlined in the Christchurch Casino Undesirable Behaviour SOP.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, Christchurch Casino will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, Christchurch Casino may request the customer to leave the premises, pending further investigation. At the completion of its investigation, and where a person is found to be offering loans for financial gain, Christchurch Casino will issue that person with a trespass notice.
- Christchurch Casino will notify DIA Gambling Inspectors of suspected loan sharking activity in accordance with Minimum Operating Standards for Records and Notification. Where appropriate Christchurch Casino will also notify relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e. not the casino), Christchurch Casino will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.
- Depending on the outcome of the GOI investigation, the customer may be issued with a Christchurch Casino exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- Christchurch Casino will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

2.6.2 Safe gambling environment – credit provision

Policy

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

Requirements

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

Host Responsibility will record and monitor the activities of any customer with whom Christchurch Casino has a credit arrangement, including any customer whose cheque it is holding unbanked by arrangement, for indicators of potential gambling harm.

2.7 Responsible marketing

Legislation and industry codes

Christchurch Casino's marketing activities comply with applicable laws, Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004, relevant industry codes including the New Zealand Advertising Standards Authority "Gambling Advertising Code" and licence conditions.

Requirements

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

Christchurch Casino will ensure an internal process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of Christchurch Casino's Loyalty programme and/or on-line social media platforms.

This process includes consultation with Host Responsibility during the development of initiatives. Consultation includes consideration of the following principles.

Does the marketing initiative:

- Target groups at increased risk of experiencing gambling harm?
- Target minors, portray minors participating in gambling activities, or advertise gambling on radio/television at times when minors are more likely to be exposed?
- Encourage or reinforce gambling behaviour(s) that may be associated with harm, including:
 - encourage customers to participate beyond their limits of time or money?
 - discourage customers from taking breaks?
 - promote gambling as a means of relieving financial or personal difficulties?
 - state or imply that gambling is a means of winning or paying for household staples, education or housing commitments?
 - promote excessive alcohol consumption or associate gambling with excessive alcohol consumption?
- Present gambling in an unrealistic, misleading, or deceptive way, including:
 - exaggerating the chances of winning or the size of the prize, including a promise of winning?
 - stating or implying that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game?
 - exploiting superstitions or concepts of luck?

2.8 Display of signage and provision of gaming information to customers

Background

A key component of the Programme is the provision of information for customers. Provision of information is intended to assist customers to make informed decisions about their gambling and alcohol consumption while at Christchurch Casino.

A description of how Christchurch Casino will discharge its obligations to offer information and advice to persons identified as problem gamblers is addressed in the Problem Gambler Identification Policy and the SOPs.

Approach

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

Display of signs, brochures, clocks and website

Christchurch Casino ensures that:

- host responsibility material is displayed prominently and translated into a variety of languages besides English, consistent with the cultural make-up of its customer base;
- brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations;
- all gaming machines and gaming tables at Christchurch Casino display problem Gambling Helpline telephone numbers. The information is also displayed on or near all ATMs, bathrooms and the smokers' room; and
- clocks are on display in the Christchurch Casino Gambling Area.

Christchurch Casino will make available its 'Your guide to understanding gaming machines' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are, or that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

Christchurch Casino actively promotes the Gambling Helpline and other free problem gambling counselling service contact details through its host responsibility resources. Customers demonstrating potentially harmful behaviour are encouraged to contact these services. All excluded customers, and third parties who contact Christchurch Casino about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

Christchurch Casino has a host responsibility section on its website.

Display of game rules, permissible bets and payment of winning bets for table games

Information is made available to customers that pertain to game rules, permissible bets and payment of winning bets as required by section 175 of the Act.

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies minimum and maximum bets, and payments of winning bets. Signage is also displayed stating that employees are unable to accept tips.

Display of game rules, permissible bets and payment of winning bets for electronic gaming machines

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the 'Your guide to understanding gaming machines' brochure, which is available in the Gambling Area.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, an appropriate gaming employee will explain this and can provide a "How to play" brochure to assist.

Display of game rules, odds of winning and information on problem gambling for Fun Play tables

Information is made available to customers that pertains to game rules, odds of winning and information on problem gambling.

Whenever a Fun Play table is open, information is displayed which advises customers that the game rules for the game are available upon request, and odds of winning and information on problem gambling.

Information requests by customers

Customers seeking further clarification of game rules will be shown where copies of game rules are available in the Gambling Area.

Information on gambling activity

Loyalty card players will be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

Non-loyalty carded players will be provided, on request, with as much information as is available to Christchurch Casino on their gambling activity.

2.9 Learning and development

Introduction

Christchurch Casino is committed to developing employee awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. Christchurch Casino shall comply with its statutory obligations relating to problem gambling awareness training, including as set out in Regulation 12 of the Gambling (Harm Prevention and Minimisation) Regulations 2004.

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

Christchurch Casino's learning and development initiatives use established models of best-practice and include a training mix of classroom based, and on-the-job coaching. Learning and development resources are tailored, depending on the roles and responsibilities of employees, and their required host responsibility customer interactions.

Overview of employee roles

Frontline employees: All employees are trained to identify indicators of harm. All employees are expected to refer their observations or indicators of potential concern to a supervisor/manager.

All employees are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Frontline employees have a primary role in being alert to and identifying indicators of harm, and will report observations of concern to a supervisor/manager.

While it is not their primary role, frontline employees are trained and will approach customers themselves in circumstances, for example, where a matter is urgent or a manager/supervisor is not available.

Supervisor/Manager: The supervisor/manager is the first point of contact for escalation for indicators of harm. Depending on the circumstances, the supervisor/manager delivers interventions by providing information, advice and assistance to customers or taking other appropriate action(s) to minimise harm.

Supervisors and managers are also responsible for ensuring that all observations of indicators reported to them by employees, and any follow up responses taken are logged and sent to Host Responsibility. Supervisors and managers are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

Host Responsibility: Host Responsibility records, collates and analyses all information relating to indicators of problem gambling noted by frontline employees, supervisors and managers. Host Responsibility also records interactions and interventions they undertake themselves. The information is used to undertake a section 309 assessment.

As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken. This may include meeting with customers. Host Responsibility is responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to employees.

Learning and development requirements

Induction training (Level 1)

All employees must participate in classroom-based training within a reasonable timeframe of commencement (within three months). This training includes:

- responsible service of gambling and alcohol;
- identification of problem gamblers;
- reporting and recording procedures for observations;
- approaching and providing information about problem gambling to players when an authorised person is not available, or the matter is urgent; and
- awareness of employee gambling-related harm.

Christchurch Casino will work to supplement this classroom-based training by ensuring that these employees also complete a written test. A failure to pass will result in the person undergoing further training and re-sitting the test. There will also be refresher training as noted below.

Training for employees will be further supplemented by on-the-job coaching and support.

Induction training will generally be classroom based.

Training for Supervisors (Level 2)

Supervisors/Managers from Gaming, Food & Beverage, Security and Surveillance and any other employees where it is believed it will be beneficial, will participate in supplementary Level 2 training. This training is to be undertaken as soon as practicable of commencement or promotion to a supervisor position. The training includes information on:

- identification of problem gamblers;
- overview of the legal framework and Host Responsibility Programme;
- initial action with respect to customers requesting problem gambling assistance;
- identification and intervention with respect to excessive alcohol consumption; and
- importance of reporting.

Advanced training (Level 3)

Additional training will also be given to all employees who will be responsible for conducting interventions with customers.

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

- Christchurch Casino's legal and regulatory requirements;
- identification of problem gamblers;
- intervention including brief interventions, de-escalation and motivational interviewing;
- debriefing and employee support;
- problem gambling treatment processes;
- cultural awareness;
- advanced Responsible Service of Alcohol (RSA) – intervention and slowing service;
- awareness of employee gambling-related harm; and
- suicide awareness.

Refresher training

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

Christchurch Casino will provide RSA refresher training for frontline employees. Where appropriate Christchurch Casino will work with external agencies to develop this training.

General Manager training – Sale and Supply of Alcohol Act

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

Suicide awareness training

Security Shift Managers are trained to respond to customers who are at risk of suicide. This training may be facilitated by an external provider.

Informal learning and development

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

- internal communications, e.g. employee newsletters; and
- inclusion in business or management processes, e.g. employee meetings and key performance indicators.

Evaluation

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

- employee training feedback and evaluation forms;
- employee knowledge recall and application of knowledge;
- staff focus groups; and
- analysis of training needs.

2.10 Identification of problem gamblers

A copy of Christchurch Casino's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme. The policy fulfils Christchurch Casino's obligations under the following sections of the Act.

Section 308 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must have a policy for identifying problem gamblers, which includes:

- an acceptable definition of problem gambling;
- indicators of problem gambling in the casino; and
- the steps to be taken in identifying actual or potential problem gamblers.

This policy must be made available upon request. It is also available from Christchurch Casino's website. Christchurch Casino must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

Section 309 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

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

If a customer is approached and provided with the above information and advice on problem gambling but does not request self-exclusion, section 309A of the Act requires the holder of a casino operator's licence, or a person acting on its behalf, must take all reasonable steps to assist that person (including, if appropriate) issuing an exclusion order, if the person's ongoing gambling or other behaviour gives reasonable cause to believe that he or she is a problem gambler.

3.0 Monitoring and reporting

Introduction

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

The Christchurch Casino Host Responsibility Programme is measured and monitored using a range of indicators that are set out below. These indicators reflect the level of activity under the Programme, compliance with legal obligations, and progress against all the Programme objectives as set out in section 1.

The Programme is embedded into the business and specifies Christchurch Casino's minimum requirements in relation to host responsibility obligations. Christchurch Casino is not prevented from trialling and introducing new initiatives in addition to what is specified in the Programme. In consultation with Gambling Commission, any such enhancements may be incorporated into the Programme, prior to the next three-yearly review.

Reports to the Gambling Commission

Christchurch Casino will report annually to the Commission on the implementation of the Programme.

Reports will include the following information:

- a description of the resources put into the core elements of the Programme;
- a description of activities undertaken by Christchurch Casino under the Programme;
- reporting against the measures specified below, including a comparison to previous data where applicable;
- Christchurch Casino's discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the DIA and other meetings held as required; and
- proposed improvements to the Programme.

Gambling Related Measures	Source of data	Frequency
<ul style="list-style-type: none"> Number of customers about whom there have been observations. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of PG indicators reported to Host Responsibility. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of approaches to Christchurch Casino by third parties. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of problem gamblers identified by the casino. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers in Host Responsibility log. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of GOI files by: <ul style="list-style-type: none"> ethnicity gender age preferred mode of gambling (tables/EGMs). 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of interventions conducted with customers. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of exclusions by: <ul style="list-style-type: none"> ethnicity gender age preferred mode of gambling prompted by third party disclosures exclusion type (self/Christchurch Casino) timeframe following re-entry. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi venue exclusions. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi casino exclusions. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in Pre-Commitment. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of excluded customers agreeing to be contacted by help services on exclusion form. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of breaches of exclusion by: <ul style="list-style-type: none"> ethnicity gender age. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of exclusions by length: <ul style="list-style-type: none"> 3 months 6 months 9 months 12 months 24 months. 	Christchurch Casino	Annual

• Number of successful and unsuccessful applications to re-enter following exclusion.	Christchurch Casino	Annual
• Number of persons trespassed or required to leave for making loans for financial gain.	Christchurch Casino	Annual
• Number of customers enrolled to use SET.	Christchurch Casino	Annual
• Number of customers with GOI file opened after enrolling to use SET.	Christchurch Casino	Annual
• Number of customers Casino-Excluded or Self-Excluded after enrolling to use SET.	Christchurch Casino	Annual
Measures relating to responsible consumption of alcohol		
• Number of "Under the Influence" (UTI) incidents (internal report).	Christchurch Casino	Annual
• Number of requests for people to leave due to the amount of alcohol consumed.	Christchurch Casino	Annual
Measures relating to employee training		
• Level 1 courses • Level 2 courses • Level 3 courses • Refresher training • Number of employees who need to be trained in each category, and proportion of those employees that have completed the appropriate level training.	Christchurch Casino	Annual
• Employee recall of knowledge and behaviours related to host responsibility and associated policies and procedures.	Christchurch Casino	Annual
• Employees' perceptions on the effectiveness of the Employee Gambling Harm Programme.	Christchurch Casino	Annual
• Results of tests conducted by employees relating to host responsibility and associated policies and procedures.	Course Evaluations	Annual
• Employees' perceptions of the effectiveness of training.	Course Evaluations	Annual
Other Programme activity and compliance-related measures		
• Number of internal and external underage incidents.	Christchurch Casino	Annual
• Number of unaccompanied children.	Christchurch Casino	Annual
• Number of unaccompanied children where the care giver is gambling.	Christchurch Casino	Annual
• Number of supervised children.	Christchurch Casino	Annual
• Number of supervised children in our surrounds where the care giver is gambling.	Christchurch Casino	Annual
• Number of people trespassed or requested to leave the casino for other reasons.	Christchurch Casino	Annual

Appendix A – Current Host Responsibility Resources

(as at March 2020)

Brochures

“PlaySafe DrinkSafe”

Aimed at encouraging customers to play and drink safely while at Christchurch Casino. The brochure is translated to reflect our customers.

- Translations include;
 - o Chinese
 - o Korean
 - o Hindi
 - o Other languages as suggested by the demographic figures

“Your guide to understanding gaming machines”

Aimed to help customers understand how gaming machines work and make informed decisions about their gambling, it also provides an understanding about odds of winning or losing.

“PlaySafe DrinkSafe - not just for our customers”

Now a part of Christchurch Casino’s employee manual, this advisory offers information on established, specific problem gambling risks to casino employees and it provides a number of options if they need to speak with someone. Employees are directed towards choicenotchance.org.nz, where they can take undertake a self-assessment.

“Unaccompanied Children Policy – not even for a minute”

The brochure outlines NZ law and the measures Christchurch Casino will undertake if a child is found unsupervised in any of the casino’s surrounds.

“Your guide to setting Playing Limits on gaming machines”

This brochure provides a guide to setting expenditure and/or time limits using the Pre-commitment facility on gaming machines.

Signage

“Customer Care – Code of Conduct”

Displayed on each level; emphasising the casino’s commitment to providing a safe gambling environment.

“DrinkSafe”

Aimed at encouraging customers to consume alcohol responsibly.

“PlaySafe”

Aimed at encouraging customers to play safely while at Christchurch Casino, displays the 0800 Gambling Helpline.

“Concerned about your own or someone else’s gambling?”

A self-help poster promoting host responsibility and helpline contact details.

“Responsible service of alcohol policy”

Displayed in all bars for customers to read and used as a reference tool for employees serving alcohol.

Conditions of entry

Displayed at the primary entrance emphasising the casino's expectation concerning appropriate dress and behaviour; it also outlines the restricted age limit (20+).

PlaySafe DrinkSafe 'not just for our customers'

Displayed back of house to encourage responsible gambling and drinking behaviours, as well as risk factors around employee problem gambling and support services available.

Appendix B



CHRISTCHURCH

CASINO

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

Problem Gambler Identification Policy

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

Objective

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

Statutory Requirements

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

Section 309 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of the licence holder, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

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

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

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

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

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

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

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

Scope of Christchurch Casino Problem Gambler Identification Policy

This Policy describes:

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

Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

- Exclusion and Re-Entry;
- Unaccompanied children and
- Gambling Limitation.

Section One – Definition of a problem gambler

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

“Harm” is defined as:

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

Section Two - Indicators of problem gambling

Introduction

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

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

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

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

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

INDICATORS

Strong Indicators

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

General Indicators

Intensity and Frequency of Play

- Customers whose gambling data (accessed through customer loyalty accounts) is assessed by the Focal algorithm and by the HR Team as being high risk.
- High visitation frequency combined with high levels of expenditure on all forms of gambling, including table games, over a period of time.;
- Very few breaks from gambling – almost continuous play;
- Increasing periods of play, and betting more each time, noted over a period of time (noting that gambling expenditure may reduce as the customer's financial resources are exhausted);

- Disconnect with time spent playing, including missing key times (e.g. meals), rushing when leaving machine or staying after friends/family leave;
- Changes in patterns of play; or
- Breaching pre-commitment limits and/or multiple increases or disabling of pre-commitment limits.
- Failure to settle credit arrangements as agreed, including redemption of cheques and markers when due

Visible Emotional Disturbance

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

Dysfunction in Social Behaviour

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

Excessive Access to Money

- Leaving the casino to get additional money and coming back after having appeared to have run out of money;
- Repeated ATM or Cash Desk visits and/or multiple declined transactions;
- Borrowing money, including begging;
- Not having sufficient money to exit car park;
- Constantly seeking complimentaries; or
- Looking for residual credit on gaming machines, or TITO tickets left in the collect tray.

Expenditure and Frequency of Play

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

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

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

Other Observations

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

Section Three – Sources of Indicator Data

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

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

All information on customers collated from the sources described below is recorded as soon as practicable into I-Trak.

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

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

CUSTOMER DISCLOSURES

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

Direct disclosures

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

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

Indirect disclosures

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

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

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

Direct and indirect disclosures from customers must be recorded into I-Trak and made available to Host Responsibility, as soon as practicable, to be used in making problem gambling assessments.

BEHAVIOURAL OBSERVATIONS

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

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

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

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

CUSTOMER DATA INCLUDING LOYALTY

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

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

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

- visitation frequency.

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

All relevant information will be recorded into I-Trak as soon as practicable and made available to Host Responsibility.

THIRD PARTY DISCLOSURES

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

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

Third party disclosures range from someone seeking general information about a customer, through to a request that a customer at the casino be removed immediately because of concerns about the customer's gambling. Third party disclosures that may or may not make reference to a person's gambling is a strong indicator of harm and will be referred immediately to a Shift Manager or Host Responsibility and treated on an urgent basis.

In all cases where a third party appears to express a concern about a customer, employees will ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this will be recorded into I-Trak and made available to Host Responsibility. Details must be taken, including contact details and a summary of concerns. As a first step, an attempt to identify the customer within the venue (e.g. via Loyalty card use, if available or feasible) should be undertaken. If found, further enquiry with the customer will be undertaken. If appropriate the customer may be requested to leave the premises for a period of time to allow further investigations to be made. If requested to leave, Christchurch Casino will also provide to the customer problem gambling information, including Exclusion options. The action must be logged into I-Trak and made available to Host Responsibility as soon as practicable to allow an investigation of the concerns to be completed.

If the individual is not found, or not immediately requested to leave or issued with an exclusion order, a GOI file will be opened and they will be subject to ongoing monitoring.

All third party information should be corroborated as part of an internal investigation. The Information Collection and Collation and the Analysis an Intervention SOPs outline the specific steps taken by Christchurch Casino in corroborating information.

INTERVIEWS WITH CUSTOMERS OR EMPLOYEES

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

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

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

Section Four - Identification

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

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

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

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

Obligation to Identify

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

Analysis of Information

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

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

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

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

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

Identification

Strong indicators

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

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

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

General indicators

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

Consequences of Identification

Once identified as a problem gambler, Christchurch Casino must:

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

¹ Section 309

² Section 310

³ Section 309A

Section Five – Record keeping

Recording, collation and analysis of information

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

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

As outlined in Section 3, all information collated by Christchurch Casino in relation to a customer is recorded as soon as practicable into I-Trak.

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

GOI files

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

- in circumstances where a customer has come to the attention of Host Responsibility for monitoring;
- a third party disclosure is made in relation to a customer's gambling and when the individual of concern is not immediately Excluded or formally requested to leave;
- when required by the terms of any approved circumstances for providing credit; or
- a customer returns from Exclusion having fulfilled the criteria.

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

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

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

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

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

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

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

Section Six – Review

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

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