

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

**AND** on an application by  
**CHRISTCHURCH CASINOS LIMITED** for approval to install a temporary cashiering facility at the Christchurch casino

**BEFORE THE GAMBLING COMMISSION**

Members: L M Hansen (Chief Gambling Commissioner)  
 D C Matahaere-Atariki  
 S C L Pearson

Date of Application: 2 February 2022

Date of Decision: 10 February 2022

Date of Notification  
 of Decision: 18 February 2022

**DECISION ON AN APPLICATION BY CHRISTCHURCH CASINOS LIMITED FOR APPROVAL TO INSTALL A TEMPORARY CASHIERING FACILITY AT THE CHRISTCHURCH CASINO**

**Introduction**

1. Christchurch Casinos Limited ("**CCL**") applied to the Commission, under conditions 6, 7 and 12 of CCL's venue licence, and condition 23 of CCL's operator's licence, for approval to install a temporary cashiering facility at the Christchurch casino.

**Licence conditions**

2. The relevant are licence conditions as follows:

**CCL's venue licence**

6. Subject to the provisions of condition 7, the Licence Holder must obtain the approval of the Commission prior to:
  - (a) Any construction or design changes whatsoever in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4) and for any construction or design changes elsewhere in the Casino Venue which may impact on the matters set out in condition 7;
  - (b) the construction or relocation outside the Gambling Area and Additional Gambling Areas and within the Casino Venue of bank facilities available to the public excluding ATMs, EFTPOS and like devices; and
  - (c) the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue or on or around the building within which it is located.

The process by which the Licence Holder may obtain approval for construction or design changes to Levels 3 and 4 and the rooftop area of the

Casino Venue, (paragraph (a) above) is set out in condition 7. The Commission will determine any application for approval under 6(b). The Executive Director may approve the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue or on or around the building within which it is located (paragraph (c) above) if he/she is satisfied the proposed changes will have no potentially adverse effects. If he/she is not so satisfied, the proposed changes must be referred to the Commission for a decision on approval.

7. The Licence Holder must notify the Executive Director of any proposed changes to the construction or design for which approval is required under condition 6. Notification must be accompanied by relevant drawings and an assessment of any impacts the alterations may have on:
- (a) the integrity and fairness of games;
  - (b) the effectiveness of security and surveillance;
  - (c) harm prevention, harm minimisation and responsible gambling;
  - (d) potential access to the Gambling Area by persons under 20 years of age; and
  - (e) compliance by any person with the Act, including section 11 of the Act.

The Executive Director may approve the proposed changes to the construction or design if he or she is satisfied that there are no adverse impacts in relation to the matters specified in (a)-(e) above. If the Executive Director is not satisfied, he or she will refer the proposal to the Commission for determination.

12. The approval of the Commission is required for the construction of any additional cashiering facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

#### **CCL's operator's licence**

23. The approval of the Commission is required for the construction of any additional cashiering facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3 or 4). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

#### **CCL's submissions**

3. CCL submitted, in summary, as follows:
- (a) Under the red traffic light setting of the COVID Protection Framework ("CPF"), only 100 people per defined space are permitted at the Casino. After operating at "red" for one week, it now wants to deploy a temporary cash desk when the Casino is operating at that setting.
  - (b) The hoardings between the Level 1 Café area and the Level 1 MGF area, and the hoardings between the Level 1 Valley Slots area and the Level 1 MGF area have physically separated the main Cash Desk facility from parts of the casino.

- (c) During peak times when the MGF may be at capacity, guests from the Café, Valley and Monza areas can only conduct transactions at the Main Cash Desk when less than 100 people are on the MGF.
- (d) This creates an issue with customer service as well as creating queues at a thoroughfare area, when physical distancing should be observed.
- (e) It wants to alleviate these issues by installing a temporary cash desk area on Level 1 near the Valley Bar. The proposed location of the facility is identical to that previously approved by the Commission under Alert Level 2 in decisions GC07/20, GC15/20 and GC17/21.
- (f) Its goal is to minimise the movement of guests from one defined space to another, and reduce congestion, thereby limiting the potential spread of COVID.
- (g) In view of its temporary nature, the cashiering facility is likely to be relatively basic; just a high desk for a staff member to stand behind, with a counter top, computer and lockable drawers. However, the requirements of condition 12 of its venue licence will be met. A small hoarding will secure the area from members of the public.
- (h) No other construction will be required. Its placement on the floor will have no adverse impact on the matters set out in condition 7 of its venue licence.

#### **The Secretary's submissions**

6. The Secretary submitted that he had no regulatory concerns with CCL's proposal, and that the proposal was consistent with the information that CCL provided to one of his regulators during a tour of the Casino.

#### **Analysis**

7. CCL has previously received approvals from the Commission to install temporary cashiering facilities during periods of COVID restrictions. Those approvals were for deployment during restrictions under the former COVID alert system, but CCL now seeks an approval to deploy the additional facility under the CPF.
8. As the Commission has noted in previous decisions of this nature, facilitating cash access at casinos is a matter that requires careful consideration as access to cash has been linked with gambling harm. However, during periods of COVID restrictions, the Commission has provided temporary approvals in order to help prevent the transmission of COVID-19 as doing so helps alleviate congestion. At present, the Omicron variant of the COVID-19 virus is becoming widespread in the community so the re-approval of a cashiering facility on a

temporary basis is sensible. Helping to prevent the spread of the COVID-19 virus is a matter that the Commission considers to be highly relevant in the circumstances.

9. The Secretary had no concerns with CCL's proposal.

#### **Decision**

10. The Commission approved CCL's application for approval to install a temporary cashiering facility on Level 1 of the Christchurch Casino, under conditions 6, 7 and 12 of CCL's venue licence, and condition 23 of CCL's operator's licence. The temporary facility may be deployed when Christchurch is subject to COVID-related restrictions.

#### **Right of appeal**

11. Pursuant to section 235 of the Act, a person affected by this decision may appeal that decision to the High Court. An appeal must be made within 15 working days of the date of notice of the Commission's decision, or any longer period that the High Court may allow.



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Lisa Hansen  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

18 February 2022

