

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: S W Hughes KC (Chief Gambling Commissioner)
S C L Pearson
W A Acton
S T Shaw
C M Risk

Date of Decision: 7 July 2023, 8 March 2024

Date of Notification
of Decision: 6 May 2024

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

Introduction

1. Christchurch Casinos Limited ("**CCL**") is licensed to operate the Christchurch Casino. Condition 29 attached to CCL's operator's licence requires the Gambling Commission to review the Host Responsibility Programme ("**HRP**") for the Christchurch Casino every three years.
2. By this decision, the Commission amends the HRP for the Christchurch Casino, approved by the Commission in decision GC01/20, by replacing it with the revised HRP attached to this decision. The HRP includes the Problem Gambling Identification Policy ("**PGIP**") required for the Christchurch Casino.

Process

3. The Commission is required under the licence conditions to review CCL's HRP every three years. CCL's licence conditions further provide that the Commission will consult with interested parties, as appropriate, and amend the HRP as it determines, after giving the Licence Holder the opportunity to comment.
4. The Commission's last review of the HRP concluded with decision GC01/20, that replaced the then existing HRP with a new approved HRP.

5. In March 2023, CCL submitted its revised HRP and PGIP for consideration. The Commission understands that CCL met with the Department of Internal Affairs (“**DIA**”) prior to submitting the proposed new HRP.
6. A number of potentially interested parties were invited to make submissions on CCL’s proposal. The Commission invited submissions from a number of health agencies following guidance from Manatū Hauora – Ministry of Health (“**MoH**”). New Zealand’s health system was restructured in 2023 and MoH suggested that the Commission should invite submissions from all potentially relevant health agencies while the (then) existing structure was being transitioned to the new structure.
7. Submissions were sought from the following parties:
 - (a) the Secretary for Internal Affairs (“**Secretary**”);
 - (b) MoH;
 - (c) Te Whatu Ora – Health New Zealand (“**TWO**”);
 - (d) Te Aka Whai Ora – Māori Health Authority;
 - (e) Te Pou Hauora Tūmatanui – Public Health Agency;
 - (f) Waitaha Canterbury - Canterbury DHB;
 - (g) PGF Group (“**PGF**”);
 - (h) Salvation Army Oasis (“**SA**”); and
 - (i) Christchurch City Council.
8. Submissions were received from the Secretary, MoH, PGF, TWO and SA. The Commission also received submissions from Asian Family Services (“**AFS**”) and Mapu Maia (“**MM**”), which are part of PGF.
9. On 16 May 2023, the Commission forwarded submissions to CCL and invited it to file submissions in reply, which it did in June 2023.
10. While reviewing the HRP for the Christchurch Casino, the Commission was also reviewing the HRPs for the four SkyCity casinos and the HRP for the Grand Casino Dunedin. As part of the review for the Grand Casino Dunedin, the Commission obtained a report from Professor Paul Delfabbro from the University of Adelaide (“**2022 Delfabbro report**”). Although the Commission obtained this report for the purpose of reviewing the HRP for the Grand Casino Dunedin, the matters it covered were of potential application to HRP reviews generally, including the SkyCity and CCL HRPs. As the Commission had seen the 2022 Delfabbro report, it considered it appropriate to make it available to casino operators and submitting parties in the course of other HRP reviews.

11. The Commission made the 2022 Delfabbro report available to the casino operators and submitting parties during the review of the SkyCity HRPs, and invited them to make submissions on it. The submitting parties on SkyCity's HRP review included all of the parties that submitted on CCL's HRP review.
12. CCL responded to the 2022 Delfabbro report on 8 May 2023.
13. The Commission concluded its review of the SkyCity HRPs in December 2023 (decision GC09/23 – the “**SkyCity decision**”) in advance of completing its reviews of the HRPs for the Christchurch Casino and the Grand Casino Dunedin. The SkyCity decision made extensive reference to SkyCity's recent commitment to introduce Mandatory Carded Play (“**MCP**”) to its casinos, and referred to a submission by SkyCity that it intended to work closely on MCP with the Christchurch and Dunedin Casinos, and possibly the class 4 sector, so that a universal MCP system could be made available across New Zealand. The Commission understands that SkyCity has liaised with both the Christchurch and Dunedin Casinos in relation to MCP.
14. On 19 December 2023, the Commission published the SkyCity decision on its website. On 20 December 2023, the Commission wrote to CCL and the parties who filed submissions on CCL's application for approval of a new HRP. The Commission's letter made reference to SkyCity's MCP proposal, as set out in decision GC09/23, and invited further submissions on it and any other aspects of the SkyCity decision. The Commission provided a further copy of the 2022 Delfabbro report to assist parties. Further submissions were received from CCL, PGF, TWO, MoH and the Secretary.
15. The Commission first considered CCL's proposed HRP at its 7 July 2023 meeting, reaching provisional decisions on several issues. The Commission subsequently considered CCL's proposed HRP again at its March 2024 meeting, following receipt of the further submissions.

Jurisdiction

16. Condition 26 of the licence conditions attached to CCL's operator's licence sets out the matters that the HRP for the Christchurch Casino must address, as follows:
 26. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
 - (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
 - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of

- the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
- (c) the provision of loss and expenditure data to individual loyalty programme members;
 - (d) identification of problem gamblers and steps to be taken following identification. This shall include, as a minimum, the following:
 - (i) an acceptable definition of problem gambling;
 - (ii) indicators of problem gambling in the gambling venue;
 - (iii) the steps to be taken by the Licence Holder in identifying problem gamblers;
 - (iv) the steps to be taken by the Licence Holder following identification of problem gamblers;
 - (e) the provision of staff training;
 - (f) the provision of exclusion, self-exclusion and limitation programmes;
 - (g) assistance to casino employees with managing the potential for personal problem gambling;
 - (h) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
 - (i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;
 - (j) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
 - (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
 - (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
 - (m) standards of dress and behaviour at the casino;
 - (n) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
 - (o) liaison with problem gambling treatment providers, community service organisations and community representatives;
 - (p) the provision of a safe gambling environment at the casino; and
 - (q) such other matters as the Commission may require.

17. A core focus of the HRP is to set out the specific means by which CCL is required to discharge the obligations imposed by sections 308-312A of the Gambling Act 2003¹ concerning the identification of problem gamblers, the provision of assistance to them, exclusion procedures and record-keeping, as follows:
- (a) Section 308(1) requires the holder of a casino operator's licence to develop a programme or policy for identifying problem gamblers (resulting in a PGIP). 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 self-identified 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, to the Secretary.

¹ All section references are to this Act unless otherwise stated.

18. Section 4 of the Act defines “problem gambler” as:

A person whose gambling causes harm or may cause harm.

The statutory definition does not require a clinical diagnosis and expressly includes an element of potentiality to cause harm (which itself is defined very broadly). The Act’s provisions impose a series of obligations applying to a range of persons, from potential problem gamblers (a person who is potentially someone whose gambling causes or may cause harm) to self-identified problem gamblers.

19. The Commission has concluded that the statutory provisions and the definitions work as follows:

- (a) A problem gambler is someone whose gambling conduct has characteristics which cause harm “or may cause harm”. There is a sense in which any undertaking of a particular activity carries with it the potential for that activity to cause harm (as the possibility of harm being caused by an activity can only be completely excluded if the activity itself does not take place) but it is clear that the definition is not to be interpreted in that very broad way. If that approach were taken, there would be no difference between a gambler and a problem gambler and it would eliminate the distinctions which the language of the Act clearly recognises (as set out below). A problem gambler, as defined, is not limited to someone whose gambling behaviour has actually caused harm and includes someone who gambles in a manner which may cause harm.
- (b) The PGIP required by section 308(1) must be used to identify actual or potential problem gamblers (section 308(4)); the latter are those who **may** be gambling in a manner which may cause harm.
- (c) Of those identified as actual or potential problem gamblers, only those whom the casino operator has reasonable cause to believe to be a problem gambler (as explained above in (a)) must be approached and given information.
- (d) Any of those approached may be excluded by the casino operator for a period of up to 2 years.
- (e) Those who identify themselves as a problem gambler and who request exclusion must be excluded by the casino operator for a period of up to 2 years.

20. The HRP sets out how CCL must undertake activities aimed at harm minimisation, including the precise steps which CCL must take to comply with statutory obligations (such as self-exclusion under section 310) and imposes additional prescriptive obligations for how CCL

must undertake more generally expressed obligations, such as 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 (imposed by section 309A).

21. As HRPs are intended to be working, operational documents that record what the casino operator will in fact do, including in respect of discretionary matters, they contain steps which are additional to the statutory minimum. They also contain matters which are not, strictly speaking, directly concerned with problem gambling, but which are conveniently located with harm minimisation activities.

CCL's proposed HRP and PGIP

22. CCL proposed 13 broad areas of amendment to its HRP, as well as minor changes to its PGIP "to update and enhance its detail".

The Secretary's submission

23. The Secretary met with CCL prior to CCL submitting the draft HRP to the Commission. In his written submission, the Secretary proposed additional amendments to CCL's draft HRP. Unsurprisingly, the additional amendments were very similar to those proposed by him in relation to SkyCity's HRPs. The Secretary's proposed amendments may be summarised as follows:

- (a) Standard Operating Procedures ("**SOPs**") should be annexed to the HRPs to increase transparency around how CCL will undertake its harm minimisation activities.
- (b) CCL's security officers should not have the sole responsibility for dealing with unaccompanied children. At a minimum, Host Responsibility staff should be required to locate an adult and supervise unattended children.
- (c) Uncarded play has not received sufficient attention in the HRP. CCL should make measurable improvements in its monitoring of uncarded play.
- (d) The 5-hour threshold for continuous play assessment should be reduced to three hours.
- (e) In assessing what amounts to continuous play, breaks by patrons should be uninterrupted, rather than aggregated as they are at present.
- (f) A patron can presently gamble continuously for 10 hours without a break. CCL should be required to force customers to take a 30-minute break after five hours of

continuous play, not merely to encourage a break. Such events should be notifiable under section 3.0 of the HRP.

- (g) One increase of a pre-commitment limit should become a general indicator.
- (h) A cooling off period should be introduced once patrons reach their pre-commitment limit.
- (i) More should be done to minimise harmful EGM behaviour and a roadmap to compulsory carded play should be set out.
- (j) Provision should be made to make pre-commitment available to patrons who do not have loyalty cards, possibly by using temporary cards.
- (k) There should be provisions to allow for more frequent amendments to the HRP.
- (l) The use of cultural symbolism should be prohibited.
- (m) Reporting should be increased from annual to quarterly.
- (n) Begging, multiple declined EFTPOS transactions and falling asleep should be included as Strong Indicators.
- (o) While “high levels” of expenditure are currently specified as a General Indicator, the HRP should include specified amounts.
- (p) SOPs and KPIs should be created for post-identification interventions.
- (q) References to terms such as “every endeavour”, “all reasonable endeavours” and “all practical steps” should be changed to “best endeavours” because it imposes a higher duty on the operator.
- (r) CCL should proactively undertake an annual literature review to seek out new evidence in relation to indicators of harm and identifiers of problem gambling.

MoH's submission

24. MoH submitted, in summary, as follows:

- (a) Reference to the exclusion and re-entry SOP has been removed (and should be restored).
- (b) Five hours of continuous play is excessive; obligations should be imposed earlier. Breaks of less than 15 minutes are unlikely to be effective.

- (c) While the standard of dress section has been amended to state that undesirable customers should be formally required to leave the premises, patrons whose continued presence is undesirable should instead be formally requested to leave.
- (d) References to staff encouraging breaks in the continuous play section should be replaced with a requirement for a break to be taken.
- (e) The limitation programme should encompass all types of gambling at the casinos, not just EGMs.

SA's submission

25. SA submitted, in summary, as follows:

- (a) Reference to the exclusion and re-entry SOP has been removed (and should be restored).
- (b) Continuous presence should be defined as between six and eight hours, rather than 12 hours.
- (c) The continuous play timeframe should be reduced from 5 hours to three hours.
- (d) Research indicates that continuous play of three hours and longer can be considered a general indicator of harm.
- (e) The HRP allows for breaks in play "in aggregate" in assessing continuous play. The continuous play "clock" is reset whenever a customer has had breaks from gambling amounting to at least 30 minutes in aggregate. Breaks should only be counted if they are for 15 minutes or longer. Break periods should be set at a minimum of 15 minutes to be counted.
- (f) References to staff encouraging breaks in the continuous play section should be replaced with a requirement for a break to be taken.
- (g) A casual card system should be implemented under which temporary cards, which track gambling activity for 24 hours, are issued to patrons who do not hold loyalty cards.
- (h) There should be an evaluation of the effectiveness of CCL's HRP.

TWO's submission

26. TWO submitted, in summary, as follows:
- (a) Twelve hours of continuous presence is unreasonably long as Christchurch Casino has fewer non-gambling activities than some overseas venues.
 - (b) The length of the continuous play period should be reduced from five hours to three hours.
 - (c) The break in play requirements should be reviewed because very short breaks of less than 15 minutes are unlikely to be effective. Minimum break time limits should be set rather than calculating breaks in aggregate.
 - (d) References to staff encouraging breaks in the continuous play section should be replaced with a requirement for a break to be taken.
 - (e) There should be an evaluation of the effectiveness of CCL's HRP.
 - (f) CCL should be required to report to a wider group of stakeholders beyond the DIA and the Gambling Commission.

PGF, AFS and MM submissions

27. Submissions by PGF, AFS and MM (which are connected) may be summarised as follows:
- (a) While the list of indicators is comprehensive, the general indicators are not just "warning signs, that may, or may not, indicate a problem"; general indicators are as significant as strong indicators.
 - (b) A public health approach should be adopted to guide the HRP.
 - (c) The general indicators should be elevated to strong indicators.
 - (d) Twelve hours of continuous presence is excessive.
 - (e) The current five hour timeframe for assessment of continuous play should be reduced.
 - (f) A 30 minute aggregated break in a five hour period is inadequate.
 - (g) Continuous play for 3 hours should be considered a general indicator of harm.
 - (h) References to staff encouraging breaks in the continuous play section should be replaced with a requirement for a break to be taken.

- (i) There should be an evaluation of the effectiveness of CCL's HRP.
- (j) CCL should be required to report to a wider group of stakeholders, beyond the DIA and the Gambling Commission.
- (k) CCL should be required to develop cultural competency.

CCL's submissions in reply

28. CCL addressed the substance of the submissions summarised above in reply submissions. Its responses, and the Commission's conclusions on each issue, are set out in the analysis below.

Submissions in response to SkyCity HRP decision

29. Submissions were received from the Secretary, MoH, TWO, PGF and CCL. MoH, TWO and PGF largely repeated their earlier submissions, and challenged individual aspects of the SkyCity decision.
30. The Secretary drew the Commission's attention to the High Court decision in *One Foundation v Minister of Internal Affairs*, observing that the High Court had upheld the Minister's decision to take a precautionary approach in approving regulations aimed at harm minimisation at class 4 venues. The Secretary asked the Commission to adopt a similar approach by adopting all of his previously suggested amendments to the CCL HRP.
31. The Secretary also noted that requiring a customer intervention after gambling for three hours is now consistent with the requirements under the Gambling (Harm Minimisation and Prevention) Regulations 2004, in contrast to the five hour period currently provided in the HRP.
32. The Secretary further argued that the adoption of an unbroken 30 minute break to restart the continuous gambling clock should proceed without delay, rather than being delayed, because the reason for delayed implementation at SkyCity casinos was the priority given to imminent development of MCP at its casinos. CCL's position is different because, not only has it not assumed responsibility for developing MCP, but it is unclear whether and when it will adopt MCP.
33. In its submissions, CCL directly addressed a number of aspects of the SkyCity decision. It generally concurred with the SkyCity decision, but said that current technology does not allow dependable monitoring of 30 minute breaks and submitted that the aggregation of shorter breaks should continue.

34. While CCL indicated a willingness to work with SkyCity on MCP, it expressed doubts that MCP could be successfully implemented, raising a large number of concerns and difficulties. CCL indicated that it is not committed to implementing MCP until its areas of concern have been satisfactorily addressed.
35. Most of the submissions raised by interested parties on this review were also raised in relation to SkyCity's HRPs. This included the two significant issues surrounding continuous play; namely, the period which should trigger "continuous play" obligations, and the sort of breaks which should affect the assessment of "continuous play"; that is, its length and whether consisting of uninterrupted breaks or an aggregation of multiple small breaks.
36. Following the submission process, CCL proposed a series of amendments to its HRP, which included accepting suggested changes, as follows:
- (a) 2.1.3 Unaccompanied Children (Approach section – set out PPE acronym in full);
 - (b) 2.1.7 Gambling limitation (Pre-commitment) – (use of "will" rather than "may");
 - (c) 2.4 Stakeholder Engagement (Approach section – CCL will work with other gambling operators);
 - (e) 2.8 Display of Signage and Provision of Information to Customers (Title);
 - (f) 2.9 Learning and Development (Advanced Training);
 - (g) Appendix A – Current host responsibility resources (Playsafe Drinksafe brochure);
 - (h) PGIP (Section Two – Strong Indicators ("Falling asleep at a machine or table")).

CCL did not support the other suggested changes, arguing that they were not appropriate. The basis for its opposition in each case is considered below.

Analysis

37. **Section 2.1 – Policies and Procedures** – The Secretary submitted that CCL's SOPs should be annexed to the HRPs to increase transparency around how CCL undertakes its harm minimisation activities. MoH and SA noted that reference to the Exclusion and Re-entry SOP had been removed from the HRP itself, but that it remained in the PGIP. In reply, CCL submitted that, while that particular SOP is shown on its website, not all SOPs are made publicly available because they set out details that patrons could use to avoid detection.

38. The Commission considered whether to annex some or all SOPs to the HRP as part of its review of the SkyCity HRPs (see paragraphs 64-67 of the SkyCity decision). The Commission declined to annex SkyCity's SOPs to its HRPs because it saw an important distinction to be preserved between HRPs and SOPs; namely that it is the former which contains the enforceable harm minimisation obligations. However, it indicated an intention to review SkyCity's SOPs when it next reviews its HRPs in order to identify any SOP practices that should be included within the HRPs. The indication was the result of responses by SCML to the effect that inclusion in an HRP was unnecessary because the obligation already appeared in an SOP. For the reasons articulated in the SkyCity decision, the Commission has reached the same conclusion in relation to the Secretary's submission on CCL's HRP. CCL's SOPs will not be annexed to its HRP but the Commission will undertake the same SOP review exercise for CCL when its HRP is next reviewed.
39. In the meantime, the Commission amended the CCL HRP to restore the reference to the Exclusion and Re-entry SOP, noting that mere reference to the SOP will not disclose any details that gambling patrons could use to avoid detection. The HRP and PGIP will now be consistent in their reference to this SOP.
40. **Section 2.1.1 – Exclusion – Breaches** – The Secretary submitted that references to “all reasonable steps” be substituted for “best endeavours” because this imposes a higher duty on CCL. The Secretary made similar submissions elsewhere in the HRP in relation to phrases such as “every endeavour”, “reasonable endeavours” and “all practical steps”. CCL did not agree with the Secretary's proposals.
41. The Commission considered and rejected a similar submission in the SkyCity decision (see paragraphs 128-129). The Commission expressed a preference for the language of the HRP to be consistent with the language of the applicable underlying legislation, and doubts that the subtle effect of the proposed amendment was as clear as suggested. The Commission declines to adopt the Secretary's submission on this review for the same reasons.
43. **Section 2.1.3 – Unaccompanied children – Approach** – The Secretary submitted that CCL's security officers should not have the sole responsibility for dealing with unaccompanied children. He made a similar submission on the SkyCity HRP review (see paragraphs 77-78).
44. The Commission saw no reason to prohibit security officers from dealing with unaccompanied children. CCL's security staff are trained to take appropriate steps when unaccompanied children are located. The Commission has never received a report that CCL's current practice has caused any problems.

45. **Section 2.1.5 – Standard of dress and behaviour** – MoH noted that the drafting of this section had been amended to provide that “customers exhibiting undesirable behaviour may be formally required to leave” the premises. MoH considered that the HRP should state that these customers should be formally requested to leave, which CCL agreed with in its reply submissions. The Commission disagreed, preferring CCL’s original drafting. In the Commission’s view, being required to leave the premises provides greater clarity and certainty than being requested to leave.
46. **Section 2.1.6 – Long hours of play – Continuous Presence** – TWO, PGF, MM and SA submitted that the threshold for Continuous Presence should be reduced from the current 12 hours. SA submitted that it should be reduced to between 6 and 8 hours. CCL opposed amending the current requirement, referring to the 2022 Delfabbro report which provided that 12 hours is not too long to spend at a casino that offers a range of activities. TWO submitted that CCL has fewer non-gambling activities than some overseas venues.
47. CCL further submitted that, after 12 hours of Continuous Presence, it should interact with a patron and, provided that a welfare check has not already been undertaken, request the patron to leave the premises for at least 24 hours.
48. As the Commission noted at paragraph 81 of the SkyCity decision, Continuous Presence is simply being present at the casino without necessarily undertaking any gambling. Continuous Presence is distinguishable from Continuous Play, which involves a patron gambling at the casino for an extended period of time.
49. CCL’s HRP presently sets out a series of steps that it must undertake when a customer has been continuously present at the casino for 12 hours, including interaction with the customer, encouraging breaks, ongoing formal monitoring and potential removal from the casino. The Commission was generally satisfied with CCL’s proposed approach, but amended the HRP to restore the drafting approved by the Commission in 2020. CCL proposed amendments to include a qualifying reference to welfare checks after 12 hours of continuous presence, which made its obligations less clear. For the same reason, the Commission amended the fourth bullet point to restore the unqualified continuous presence period to 24 hours. Finally, the HRP was amended so that customers must now be required (not merely requested) to leave the casino for at least 24 hours after 24 hours of continuous presence. This amendment mirrors the SkyCity HRPs.
50. **Section 2.1.6 – Long hours of play – Continuous Play** – As noted above, one of the major issues to emerge from submissions was the length of time that would trigger “continuous play” obligations. CCL’s HRP presently imposes continuous play obligations once a customer has been gambling continuously for five hours or more.

51. Submitters were generally of the view that five hours of continuous gambling is too long, and that the intervention threshold should be reduced to three hours. The Secretary submitted that gambling for three hours has been strongly associated with moderate risk and problem gambling. SA and PGF referred to research which they said indicates that continuous play for three hours and longer can be considered a general indicator of harm.
52. In response, CCL submitted that it supports the view of Professor Delfabbro that five hours of continuous play strikes the appropriate balance between the need to protect gamblers from harm and the practical implementation of the HRP. Its current approach is working well and has been for a number of years.
53. In their further submissions in response to the SkyCity decision, submitters maintained that five hours of continuous play is too long. The Secretary asked the Commission to consider the High Court decision in *One Foundation v Minister of Internal Affairs*, observing that the High Court had upheld the Minister's decision to take a precautionary approach in approving regulations aimed at harm minimisation at class 4 venues. Although the decision related to class 4 gambling, the Secretary asked the Commission to adopt a similar approach by adopting his previously suggested amendments to the CCL HRP.
54. The Secretary also noted that intervention after three hours of continuous play was consistent with the Gambling (Harm Minimisation and Prevention) Regulations 2004 and that the High Court had not considered a requirement to intervene after three hours to be unreasonable in the class 4 environment.
55. The Commission had considered the issue of continuous play in detail in the SkyCity decision. In paragraphs 33-44 of that decision, the Commission set out the history of the issue, including the expert advice received from Professor Delfabbro in 2015 and 2022. The Commission decided not to require interactions and monitoring sooner than after five hours of continuous play (as defined), setting out its rationale at paragraph 42, as follows:
42. The Commission is not presently persuaded that continuous play interaction should be required in all cases sooner than five hours. For the reasons set out in the 2022 Delfabbro report, the Commission considered that requiring interaction by casino staff after 5 hours of continuous play struck the appropriate practical balance. It was concerned that compulsory earlier interaction after 3 hours, in the absence of any other reason to do so, would likely produce "quite a high rate" of false positives, resulting in casino resourcing being diverted with very little consequential benefit. An HRP needs to be capable of practical implementation in a live casino setting.
56. As the Commission considered the question very recently with input from an external expert and the submissions by parties on both reviews were largely the same, the Commission saw no basis to depart from the conclusion that it reached in the SkyCity decision.

57. The only new submission, not made in the course of the SkyCity review, involved the reference to the *One Foundation* decision. However, in the Commission's view, the High Court's decision addressed different issues from the one presently before it; the *One Foundation* decision was the outcome of a judicial review challenge to the process that led to the promulgation of the Gambling (Harm Minimisation and Prevention) Regulations 2023, and to the substance of those Regulations and their effect on class 4 gambling. It upheld a Regulation which was the result of a precautionary policy approach, namely one made without prior evidence of the anticipated beneficial effect. The Commission is certainly not averse to imposing harm minimisation obligations on a precautionary basis but the Regulation's requirement was imposed in somewhat different circumstances to the present.
58. The Commission has twice obtained advice from a subject matter expert on continuous play in the casino environment. It originally imposed an obligation for interaction and subsequent monitoring after receiving advice from Professor Delfabbro in 2015. In 2022, it sought updated advice from Professor Delfabbro; while his views had changed in some respects since 2015, he continued to recommend that five hours remain the appropriate period for continuous play intervention in the casino environment. As matters presently stand, the Commission sees no reason to change that particular obligation.
59. Notwithstanding that, the matter remains open for future reconsideration. The Commission is open to amending the five hour continuous play period if compelling new information suggests that a different timeframe would be more appropriate, as noted at paragraph 43 of the SkyCity decision:
43. However, as new research and evidence is likely to emerge over time, the question should not be regarded as settled. The Commission intends to monitor developments in other jurisdictions and to reconsider the time trigger for interaction in future HRP reviews.
60. It is also important to recognise that the continuous play staff interaction trigger applies in the absence of any other reason to interact earlier. As the Commission set out at paragraph 44 of the SkyCity decision, the continuous play obligations are additional to, and do not replace, operators' other obligations to take steps, using PGIPs, to identify potential and actual problem gamblers, and to take action in the case of all those whom they have reasonable cause to believe are problem gamblers (as statutorily defined).
61. **Section 2.1.6 – Long hours of play – Continuous Play** – The second major issue to emerge from submissions concerned the effect of breaks in play on the assessment of the continuous play trigger. CCL's HRP presently provides for breaks in play as part of the definition of the continuous play trigger; namely when a customer has been observed gaming continuously for five hours without *a break of at least 30 minutes duration (in aggregate)*.

62. In his primary submissions, the Secretary submitted that the 30-minute break should be uninterrupted, rather than aggregated, while SA, PGF, TWO and MoH all submitted that breaks should only count if they last for at least 15 minutes.
63. In reply, CCL submitted that the Commission had considered the question during previous HRP reviews and decided that aggregated breaks should be retained so that patrons were not discouraged from taking shorter breaks more frequently. In addition, it submitted that, if unaggregated breaks were required, the necessary technology does not currently exist to monitor it reliably. Finally, it noted that all EGMs in New Zealand feature pop-up messages which interrupt play for 15 seconds and which randomly occur every 20-30 minutes of continuous play. The pop-up messages cause a break in play and also provide information about the gambling session such as money spent or won, and the time spent playing.
64. As with the Continuous Play time trigger, the Commission examined the question of breaks in detail in the SkyCity decision. It is worthwhile repeating aspects of that decision in full because they are applicable to the Commission's analysis and decision on CCL's HRP.
65. After setting out the parties' submissions and relevant details from the 2022 Delfabbro report, the Commission set out its provisional view on breaks in play, stating that resetting the continuous play "clock" should require a 30-minute uninterrupted break, rather than a number of shorter breaks totalling 30 minutes, as follows:
51. At its April 2023 meeting, for the reasons set out in the 2022 Delfabbro report, the Commission reached the provisional view that resetting the continuous play "clock" should require a 30-minute uninterrupted break, with the result that a number of shorter breaks should have no effect on the definition of continuous gambling and that gambling beyond five hours without a 30-minute uninterrupted break would be regarded as continuous gambling requiring staff interaction with the customer. In the Commission's view, requiring an uninterrupted break of 30 minutes would be unlikely to discourage the taking of shorter breaks and, in any event, taking shorter breaks would be unlikely to remove the concern which the continuous gambling interaction obligation was intended to address.
66. Having reached a provisional view, the Commission described its subsequent engagement with SkyCity, as follows:
52. The Commission's decision was considered to be provisional only because it was unclear whether SkyCity's current methodology could monitor uninterrupted breaks in play; the Commission generally aims to impose obligations which it assesses as possible to meet in practice. SkyCity had included a reference to automated systems in its proposed amendments to section 3.1.6 without describing the systems referred to. The Commission understood that SkyCity had adapted its facial recognition software to assist with monitoring both length of presence and gambling activity but it had insufficient information about methodology to be confident that the change that it wished to make could practically be monitored. The Commission conveyed its provisional decision to SkyCity and invited a response.

53. In response, SkyCity asked that the status quo be maintained until satisfactory technology to monitor mandatory breaks was available for implementation. It said that its current methodology could not be easily adapted and that reliable monitoring of continuous play, taking account of longer breaks in play, might not be possible until MCP is implemented. It advised that it is working towards implementing MCP and preferred to concentrate on doing so, rather making temporary changes to its current monitoring practices.
67. The Commission invited SkyCity to attend its June 2023 meeting to discuss its response. At that meeting, SkyCity informed the Commission that work on introducing MCP across its casinos was well underway and that it expected to implement MCP within 12-18 months. It asked the Commission for the opportunity to focus on MCP, rather than being required to develop a temporary solution for monitoring 30-minute uninterrupted breaks in line with the Commission's provisional view.
68. The Commission was surprised by SkyCity's advice because its earlier submissions had suggested that MCP would be expected much later. The Commission decided that the anticipated benefits of MCP were sufficient to justify priority being given to its early introduction ahead of other considerations, including the introduction of an uninterrupted 30-minute break, as follows:
57. With the unexpected indication that work on introducing MCP had commenced and it would occur as quickly as within 12-18 months and in light of the benefits of MCP (discussed below), the Commission decided that it should prioritise the introduction of MCP ahead of other considerations. Several submitters had argued for the introduction of MCP. The DIA had sought improvements in the monitoring of uncarded play and the extension of pre-commitment availability to patrons who did not hold loyalty programme cards. The MoH sought better monitoring of uncarded play. SA had sought improvements in digital monitoring of continuous presence and continuous play and expressed support for the introduction of a casual carded play system and the extension of pre-commitment to those without loyalty cards. For that reason, the Commission decided to prioritise the early introduction of MCP without seeking further submissions.
58. On balance, the Commission considers that the benefits of MCP for harm minimisation monitoring (including monitoring of continuous play and breaks in play) are sufficiently great that the early implementation of MCP should take priority over its provisional decision to amend the continuous play obligations to introduce the requirement of an uninterrupted 30-minute break.
69. The Commission considered whether a similar approach was appropriate in the case of CCL. In submissions in response to the SkyCity decision, the Secretary submitted that the Commission should amend the treatment of breaks in play with immediate effect, as follows:

The Chief Executive further considers that a 30-minute uninterrupted break in play should be necessary where a player gambles over the defined continuous play threshold. While the Gambling Commission was inclined to make such a change, it had deferred doing so to allow SCML to prioritise introducing mandatory carded play (MCP) in the next 12-18 months.

While the Chief Executive favours consistency between the licence conditions and HRPs across all casinos, delaying the adoption of a 30-minute uninterrupted break in

play for CCL's HRP is opposed. SCML has made the commercial decision to work towards an MCP system, however its implementation is somewhat off and not certain. In the absence of a similar commitment by CCL to adopt MCP within a 12-18 month timeframe, it should not be assumed that it will adopt this technology or that CCL will support a single national system. Delaying the adoption of a 30-minute uninterrupted break without any guarantee therefore exposes problem gamblers to unnecessary risk.

70. In its submissions in response to the SkyCity decision, CCL endorsed a submission made by SkyCity prior to its decision to implement MCP; namely that technology is not currently at the level to monitor 30 minute breaks and that the use of shorter aggregated breaks should continue (although it did not explain how aggregated breaks are presently monitored, nor did it explain why aggregated breaks are easier for it to monitor than uninterrupted breaks). While CCL indicated a willingness to work with SkyCity on MCP, it expressed doubts that MCP could be successfully implemented and advised that it is not committed to implementing MCP until its concerns had been satisfactorily addressed.
71. In its reviews of the HRPs for the six New Zealand casinos, the Commission's general practice has been to impose consistent obligations and requirements at each venue unless there is a sound basis for departure. In this instance, the Commission considers that there is good reason for variation and amended the continuous play obligations to impose a 30-minute uninterrupted break as part of the assessment of continuous play.
72. As set out above, following expert advice from Professor Delfabbro in 2022, the Commission reached the provisional view that resetting the continuous play "clock" should require a 30-minute uninterrupted break. The Commission did not immediately amend SkyCity's HRPs accordingly only because it decided that the early introduction of MCP should be prioritised, above amending continuous play rules, at the SkyCity casinos. However, CCL's position is different – it is not leading development of the introduction of MCP at New Zealand casinos and there is nothing to suggest that CCL having to monitor lengthy gambling sessions by including only uninterrupted 30-minute breaks would likely delay implementation of MCP. New doubts that MCP will be implemented as soon as SkyCity earlier indicated are a further reason not to delay the change at other casinos.
73. The Commission saw no reason to delay earlier signalled changes to the assessment of continuous play (to incorporate a requirement for a 30-minute uninterrupted break) at the Christchurch Casino and amended the HRP accordingly.
74. The Commission also amended this section of the HRP to make CCL's obligations more explicit, by stating that staff must take steps (rather than staff will take steps).
75. **Section 2.1.6 – Long hours of play – Continuous Play** – The Secretary noted that, under the HRP, a patron may gamble continuously for 10 hours and submitted that CCL should be required to impose a mandatory 30-minute break after 5 hours of play. Further, the

Secretary submitted that a patron who has been gambling continuously for 10 hours should be recorded and notified to the Commission in section 3.0 of the HRP. In reply, CCL submitted that there is no value in making 10 hours of continuous play a notifiable incident, and that it is extremely rare for a patron to gamble for that period in any event.

76. The Commission addressed this matter at paragraphs 84 and 85 of the SkyCity decision, clarifying that the Secretary had not interpreted this section of the HRPs correctly because it does not require an operator to force patrons to take a break after five hours of continuous play, rather it requires staff interaction at that point. If the patron gives staff cause for concern, stronger measures are required of the operator but, if there is no cause for concern, the patron may continue to gamble, albeit with monitoring.
77. As part of the SkyCity review, SkyCity accepted that all instances of gambling continuously for 10 hours should be notified to the Commission and the HRPs were amended to reflect this requirement. The Commission amended CCL's HRP similarly. CCL will be required to note all such incidents and to inform the Commission of that total in its annual HRP report.
78. The Commission also amended this section of the HRP so that patrons are required to leave the premises and not re-enter for 24 hours (rather than merely being requested to leave).
79. **Section 2.1.6 – Long hours of play – Continuous Play** – All submitters submitted that customers should be required to take a mandatory break after the continuous play threshold of 5 hours is met, rather than merely being “encouraged” to do so. In reply, CCL submitted that a flexible framework is crucial and that a mandatory break is not required in all circumstances.
80. The Commission considers that CCL's current obligations are adequate. As just noted, the HRP requires CCL staff to interact with a patron who has been gambling continuously for 5 hours and, if the patron gives cause for concern, they must take the steps specified in the Act and the HRP. However, if the patron does not give any cause for concern, the patron may continue to gamble. After 10 hours of continuous gambling (without breaks), a patron must be required to leave the casino for at least 24 hours regardless of whether the patron has given cause for concern up to that point.
81. **Section 2.1.6 – Long hours of play – Uncarded Players** – The Secretary and MoH submitted that the monitoring of uncarded players has not received sufficient attention, with only minor changes being made which impose no additional requirements. The Secretary sought “measurable change” with KPIs and SOPs being developed to address the concern

but did not suggest what they should be. SA concurred and submitted that a casual card system should be available.

82. CCL opposed the introduction of casual cards, submitting that it has systems in place to monitor uncarded players and to intervene where necessary. It further submitted that it applies a significantly lower threshold for uncarded players than it does for carded players because of the risks associated with anonymous play.
83. As the Commission noted in the SkyCity decision, it has long been recognised that uncarded gambling is more difficult to monitor than gambling that is electronically recorded. CCL says that it uses technology (facial recognition and Servizio) to assist staff observation of uncarded gamblers, and that it has set lower thresholds for uncarded players because of the heightened risk that they pose. In such an event, the usual expectation is that the methodology and the lower uncarded threshold would be recorded in the HRP. The Commission accordingly considered whether an amendment should now be made with immediate effect.
84. On balance, the Commission decided to defer such a change until the next review, when it intends to review CCL's SOPs and to incorporate some of the terms of those into the next version of the HRP. As matters stand, it considers that it lacks sufficient information about CCL's current practices. In addition, as the Commission noted at paragraph 92 of the SkyCity decision, the introduction of MCP is expected have significant impact on the oversight of casino gambling in New Zealand. Once introduced, uncarded players are expected to cease to exist. Introduction of MCP nationally is sufficiently in prospect to justify deferring consideration of amendment of the rules applying to a section of customers who may no longer exist after MCP. This issue will be addressed at the next HRP review, whether or not MCP has been implemented.
85. **Section 2.1.7 – Gambling Limitation** – The Secretary and SA submitted that provision should be made for precommitment to be available to uncarded players, potentially with temporary cards. In reply, CCL submitted that such a facility is not wanted by its players; this was previously trialled in 2019, had no uptake, and so was withdrawn.
86. The Commission was not inclined to amend this aspect of the HRP at this review but, as with the issue of uncarded players above, this section of the HRP will likely be amended in the future after MCP is deployed.
87. **Section 2.1.7 – Gambling Limitation** – The Secretary submitted that one increase of a pre-commitment limit should become a General Indicator. At present, the General Indicators recognise multiple increases.

88. CCL disagreed, noting that an increase in a precommitment limit could be relatively innocuous. For example, if an increase is made a considerable time after the limit was originally set, or involved a change from having a daily limit to having a monthly limit.
89. The Secretary made a similar submission on the review of the SkyCity HRPs. SkyCity accepted the submission and amended the General Indicators in the PGIPs to reflect the change. The Commission decided to amend CCL's General Indicators to align with those in SkyCity's PGIPs. This is an area where broad consistency is desirable.
90. **Section 2.1.7 – Gambling Limitation** – The Secretary submitted that CCL should introduce a cooling off period for patrons who have reached their precommitment limit. He submitted that patrons set limits knowing that they cannot afford to gamble beyond that point and any further gambling would be harmful. Once limits are reached, patrons should be required to cease gambling for 24 hours. MoH noted that the current precommitment is for EGM use only and submitted that, ideally, it should include table games. CCL disagreed, submitting that a patron may reach their daily limit unproblematically and intend to visit the Casino the following day to do the same. A 24-hour cooling off period in this circumstance would be impractical.
91. CCL's pre-commitment system is voluntary and allows casino patrons to set limits on how much they spend and how long they will play for on gaming machines. As breaches of pre-commitment limits and apparent attempts to avoid monitoring of gambling are already general indicators of problem gambling, its use already has potential consequential effect. While it remains voluntary, the Commission is reluctant to add additional automatic consequences which would likely reduce the appeal of its use to customers. The Commission considers that the pre-commitment provisions are sufficient at present and should not be amended further prior to the introduction of MCP.
92. **Section 2.4 – Stakeholder Engagement – Approach** – The Secretary submitted that there is no proposal to allow for additional amendments to the HRP in between the 3-yearly review cycle. CCL submitted that this is unnecessary.
93. The Commission addressed this matter at paragraphs 100 and 101 of the SkyCity decision, pointing out that casino licence conditions currently permit operators to include improvements in the delivery of the existing HRPs as new host responsibility and responsible gambling initiatives become available, without the need for approved amendment of the HRPs. No case for amendment has been made out.
94. **Section 2.6 – Safe gambling environment** – The Secretary submitted that this section should go further, by specifying additional measures to minimise harmful EGM behaviour and set out a roadmap to introducing MCP. In reply, CCL submitted that it made changes

to its venue in 2020, including to the layout of its EGMs. These changes contribute to the safety of its environment. Further, it has introduced dedicated floor stands containing host responsibility resources.

95. The Commission could see no need to amend this section of the HRP. No specific additional change was outlined by the Secretary. Proposals seeking changes should be specific as to their content and supported by reasons for the change. The introduction of MCP is likely to follow developments by SkyCity and is unlikely to be dependent on a CCL roadmap.
96. **Section 2.7 – Responsible marketing – Requirements** – The Secretary, PGF, MM and AFS submitted on cultural appropriateness, with the Secretary submitting that the use of cultural symbolism should be prohibited. The Secretary observed that some of CCL's drafting suggests that it takes cultural aspects into consideration with its marketing initiatives but does not make that consideration sufficiently explicit.
97. In reply, CCL accepted that cultural symbolism should be considered with care but opposed its prohibition; there are many acceptable examples of the use of cultural symbolism for holidays and celebrations such as King's Birthday, Easter, Christmas and Valentine's Day.
98. The Commission was unable to identify any need for change to this section of the HRP. The HRP presently provides that CCL's marketing initiatives must comply with the applicable legal and regulatory requirements, including the Advertising Standards Authority's Code for Gambling Advertising. CCL is already required to consider its marketing initiatives against a series of principles and if any concerns are raised by third parties, the HRP provides that CCL must consider and withdraw the initiative if there is a sound basis for the concern.
99. **Section 2.7 – Responsible marketing – Requirements** – The Secretary submitted that provision should be made for the post-promotion analysis of marketing initiatives. CCL disagreed, submitting that it already monitors its customers on an ongoing basis, and has a wide range of measures in place to detect indications of problem gambling for an increase in risk of harm and a process which requires all promotions to be assessed by its host responsibility team prior to being implemented.
100. While CCL does not challenge the need to be alert to the implications of its promotions and give consideration to them before they are deployed, the Commission considers there to be value in CCL also considering the effects of its promotions after the event as well. This should allow CCL to assess more fully the effects of its promotions. The Commission amended the HRP to require CCL to conduct post-promotion analysis.

101. The Commission also amended this section to require CCL to assess risk of harm before customers are permitted to progress up the loyalty tiers at the Christchurch Casino. CCL submitted that it already has an assessment procedure in place for this in an SOP but, in order to maintain consistency and to reflect the proper role of an HRP, the Commission included a similar obligation to that set out in the SkyCity HRPs.
102. **Section 3.0 – Monitoring and reporting** – MoH, PGF and SA submitted that CCL’s reports to the Commission should be shared with other stakeholders. In reply, CCL submitted that its reports are of little value to other stakeholders, but that it is willing to distribute its report if requested to do so. CCL advised that it provides more relevant information to attendees at its liaison meetings.
103. Consistent with its approach on the SkyCity review, the Commission amended this section of the HRP to require CCL to provide the DIA with a copy of its HRP report to the Commission. The Commission did not consider it necessary to impose anything beyond that, noting that, if stakeholders attend CCL’s liaison meetings and request information, CCL has a practice of providing it. If that changes, the matter can be reconsidered at a future HRP review.
104. **Section 3.0 – Monitoring and reporting** – The Secretary submitted that the annual Host Responsibility Report provided to the Commission by CCL should become a quarterly report. In reply, CCL submitted that it saw no value in more frequent reports to the Commission.
105. The Commission saw no need to amend this section of the HRP to require quarterly reports to it. The Commission’s requirement for annual reports is intended to provide the Commission with some periodic high level information of operational trends between what are usually three-yearly HRP reviews. Annual reports are sufficient for the Commission’s purposes.
106. **PGIP – Section 2 – Indicators of Problem Gambling** – PGF submitted that the “General Indicators” should be elevated to “Strong Indicators”. CCL disagreed, submitting that the current classifications work well.
107. The Commission has previously declined to change terms which are familiar and have well-settled meanings, without a compelling reason to do so, most recently at paragraph 114 of the SkyCity decision. The proposal appears to be more than a change of terms and, in substance, is a proposal to remove any distinction between Strong and General Indicators. The distinction between Strong and General Indicators is well-established for sound practical reasons and the submission lacks any clear rationale for such a fundamental change. No compelling reason has been advanced for removing the distinction.

108. **PGIP – Section 2 – Indicators of Problem Gambling – General Indicators** – The Secretary submitted that the term “very high levels of expenditure” should be specified by examples in the general indicators. CCL disagreed, submitting that if these were publicly known, patrons would gamble below the specified level to minimise the likelihood of being identified for interaction.
109. The Secretary made a similar submission on the SkyCity review, but SkyCity’s response was different from the response of CCL. In the SkyCity decision, the Commission decided not to provide precise examples but to continue to express the indicator in broad terms, which would need to be applied in the particular circumstances of each customer and in conjunction with use of the Focal Model. The Commission is not persuaded that CCL’s objection to the provision of examples has merit. However, the submissions advocating the provision of examples did not identify any problems which had arisen from their omission since 2020, following their removal in the Auckland casino HRP in 2017, when the use of Focal was initially included. The Commission is open to reconsidering the terms of the general indicators, including the re-insertion of numerical examples, in future reviews but prefers to have concrete reasons for doing so.
110. **PGIP – Section 2 – Indicators of Problem Gambling – General Indicators** – The Secretary submitted that begging, multiple declined EFTPOS transactions, and falling asleep should be moved to become Strong Indicators. He submitted that begging and multiple declined EFTPOS transactions suggest that a patron may have exhausted their funds, while falling asleep suggests that a patron may simply be exhausted.
111. CCL accepted that falling asleep at a table or machine should become a strong indicator but disagreed that the other two general indicators should be elevated to become strong indicators. It submitted that, although these indicators may be placed at higher points in a continuum than other general indicators, they do not reach the standard of “Strong Indicators”. Strong Indicators are those that are highly likely to be associated with harm and each of the proposed indicators can be attributed to something other than a strong desire to gamble.
112. As part of the SkyCity review, the Strong Indicators were amended to include begging and falling asleep, but the Commission did not relocate multiple declined EFTPOS transactions from the General Indicators to the Strong Indicators (see paragraphs 119-121). On the information currently before it, the Commission sees no present reason to adopt different indicators for CCL; begging should be moved to the Strong Indicators, together with falling asleep at a machine or a table.

113. CCL's PGIP provides that Strong Indicators are those where the presentation of only one or two such indicators may be sufficient to identify a person as a problem gambler. The Commission also amended this aspect of CCL's PGIP for consistency with the SCML PGIPs approved in the SkyCity decision, so that the presence of only one Strong Indicator (rather than one or two) will usually be sufficient to identify the person as a problem gambler.
114. **Section 4 – Identification** – The Secretary submitted that SOPs and KPIs should be created for post-identification interventions. For example, 80 percent of interactions must occur within 10 minutes of an identification being made. CCL disagreed, submitting that its current drafting remains appropriate.
115. The Commission considered and rejected a similar submission in the SkyCity decision. By reason of its concern about imposing KPIs without careful selection of measures, including avoiding unintended or perverse consequences, the Commission was not persuaded to amend this section of the PGIP in the manner suggested for CCL's HRP. That is particularly the case with KPIs following problem gambler identifications.
116. **Section 6 – Review** – The Secretary submitted that CCL should proactively undertake an annual literature review in relation to the indicators of harm and the identification of problem gambling. CCL disagreed, submitting that it reviews literature throughout the year and attends industry conferences to keep itself apprised.
117. The Commission noted that other PGIPs contain a similar obligation and it saw no reason why it should not be included in CCL's PGIP, especially when CCL advised that the obligation reflects its current practice and amended this section of the PGIP accordingly.

Other

118. SA, PGF and TWO submitted that CCL's HRP should be externally evaluated for effectiveness.
119. The Commission considered a similar submission in the SkyCity decision. The Commission observed that HRPs are rigorously reviewed by the Commission itself, with significant input from the DIA (as regulator) and a wide range of external submitters. The Commission considers developments in other jurisdictions and sometime seeks the views of an independent expert. It was not persuaded that the HRP requires any additional evaluation.
120. PGF, MM and AFS submitted that a public health approach should be adopted to guide the HRP. In reply, CCL submitted that it already does this, stating that its Principal Objectives include "preventing the onset of gambling and/or alcohol-related harm", "facilitating

responsible gambling” and “minimising gambling-related harm for customers and other persons potentially affected”. As the Commission observed at paragraph 133 of the SkyCity decision, it has doubts that requiring an operator to take a public health approach to the detail of its HRP would be useful or appropriate. It expects that perspective to be provided by the public health bodies whom it consults in reviewing HRPs.

121. Finally, the Commission made a number of minor changes to the documents to improve their clarity all documents to align them (where appropriate to do so) and to remove any differences that were unhelpful or unnecessary.

Conclusion

122. The Commission amends the HRP for Christchurch Casino by replacing it with the revised version **attached** to this decision (including the PGIP annexed to and forming part of the HRP). The new HRP will take effect from **7 June 2024**, replacing the HRP approved by the Commission in decision GC01/20.
123. The Commission thanks all participating parties for their thoughtful submissions.



Susan Hughes KC
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

6 May 2024





CHRISTCHURCH

CASINO

HOST RESPONSIBILITY PROGRAMME
CHRISTCHURCH CASINOS LIMITED

TABLE OF CONTENTS

- 1.0 Introduction 3**
- 1.1 Statement of position 4**
- 1.2 Programme objectives..... 5**
- 2.0 Harm minimisation and prevention components 6**
- 2.1 Policies and procedures..... 7**
- 2.1.1 Exclusion 8**
- 2.1.2 Responsible Service of Alcohol 11**
- 2.1.3 Unaccompanied children 13**
- 2.1.4 Underage persons 14**
- 2.1.5 Standards of dress and behaviour 15**
- 2.1.6 Long Hours of Presence or Play 16**
- 2.1.7 Gambling limitation 18**
- 2.1.8 Cashless Gambling 19**
- 2.2 Host Responsibility information for customers..... 21**
- 2.3 Employee gambling-related harm..... 22**
- 2.4 Stakeholder engagement 24**
- 2.5 Environmental design..... 25**
- 2.6 Safe gambling environment..... 26**
- 2.6.1 Safe gambling environment – third party loans for financial gain 27**
- 2.6.2 Safe gambling environment – credit provision 28**
- 2.7 Responsible marketing..... 29**
- 2.8 Display of signage and provision of gambling information to customers 31**
- 2.9 Learning and development 33**
- 2.10 Identification of problem gamblers 36**
- 3.0 Monitoring and reporting 37**

Appendix A – Current Host Responsibility Resources for Customers

Appendix B – Identification Policy

1.0 Introduction

Approval

Effective date: 7 June 2024

Manager:

Brett Anderson
Chief Executive

1.1 Statement of position

Statement of position

Christchurch Casino is committed to providing an enjoyable 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;
- General Manager, Security & Compliance;
- General Manager, Operations;
- Anti-Money Laundering & Compliance Manager;
- Food and Beverage Operations Manager;
- Security & Surveillance Operations Manager; and
- Loyalty & Cash Desk Operations 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;
- Continuous Play and Continuous Presence;
- Pre-Commitment (Gambling Limitation);
- Underage Persons;
- Unaccompanied Children;
- Undesirable Behaviour; and
- Intoxication management.

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation;
- Analysis and Intervention;
- Repeat ATM visits;
- Cash Desk declined transactions; and
- Exclusion and Re-entry.

Other Host Responsibility SOPs:

- Cash Desk withheld payments (for banned persons);
- TAB (NZ Racing Board) Exclusions;
- Multi-Venue Exclusion (MVE) processing (received and sent); and
- Multi-Casino Exclusion (MCE) processing (received and sent).

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 & Customer Care Team Managers or Operations 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.

Christchurch Casino works to streamline the Self-Exclusion process and does not require a person to enter for the purposes of obtaining a Self-Exclusion. As well as a request made in-person, Self-Exclusions can be requested remotely by customers via:

¹ Section 309A

- telephone;
- email;
- online form on our website; or
- via a support service (who will send identification and other documents on the person's behalf).

The process is facilitated by Host Responsibility employees.

Christchurch Casino works with external services to ensure Multi-Venue Exclusion requests are managed effectively.

Third parties and service providers

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

Other measures

- 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 prompt 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 General Manager, Security & Compliance, 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 the accounts of cardholders who have been excluded, 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. In addition to the error message that the customer receives, an automated notification is also sent to Surveillance and other key employees, including Host Responsibility, for immediate response.

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 enjoyable for our guests and employees. 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 or Host Responsibility. 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 as a 'first response' and take all practicable steps to locate an adult responsible for an unaccompanied child. A Surveillance review may be conducted to assist in locating the adult/caregiver and determine their movements and activities before, during and after the period of concern.

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. A comprehensive review of the incident, and any previously obtained information, is conducted, i.e., any loyalty or expenditure data and prior indicators of problem gambling reported or other incidents. The information is used to determine any further action that may be taken, advice provided to the customer and also to ensure that as much information is available for future review, should the customer later apply for Re-Entry.

Security & Customer Care Officers will patrol the Casino car parks and surrounding environs to detect any unaccompanied children. All Security & Customer Care Officers are equipped at all times with Personal Protective Equipment, and radio devices which are used to communicate to both Security and Surveillance.

Security & Customer Care Team Managers will receive training which assists them in carrying out functions relating to unaccompanied children, including pre-hospital emergency care, psychological first aid or mental health awareness training and de-escalation training.

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 required to leave, 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, the customer must be required to leave the casino for at least 24 hours.

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 uninterrupted minutes.

As a minimum:

- When a customer has been observed to be continuously gaming for five hours without a break of at least 30 uninterrupted minutes, 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, the customer is approached with an emphasis on customer care. If during the interaction the customer gives staff cause for concern, staff must 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 two uninterrupted breaks of at least 30 minutes) and, provided that no action has already been taken under the Act, this Programme or the Policy, customers must be required to leave the casino for at least 24 hours.

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

Ascertaining the length of "continuous presence" and "continuous play" for uncarded players relies upon both observation, as well as the use of technology which provides various alerts. When 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 or 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. The increased risk of potential problem gambling associated with uncarded players is balanced by Christchurch Casino setting thresholds for system-generated alerts at levels it sees fit to assist in meeting the requirements of this Programme and its obligations under the Act and Policy.

CCL also uses technology (Servizio and FR technology) to help ensure the above policy is maintained by monitoring both carded and uncarded customers for continuous presence and/or continuous play. A range of Servizio alerts are generated which assist with employee's situational awareness, including alerts for:

- high levels of gaming machine turnover for both carded and uncarded players;
- Gamblers of Interest;
- banned members;
- Continuous Play for both carded and uncarded players;
- Continuous Presence (used alongside FR technology alerts);
- Persons of Interest.

CCL regularly reviews and sets thresholds for system-generated alerts at levels which assist in ensuring that the above policy is maintained safely, and customers are intervened with early, in line with our aim to prevent harm before it occurs or while it may be occurring.

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% and then 90% 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 and Host Responsibility who will intervene with the customer if they are still on site.

Breaches of pre-commitment limits and/or an increase or disabling of pre-commitment limits are general indicators of problem gambling.

Security, Operations Shift Managers and Host Responsibility will proactively encourage the use of this system, where appropriate, during interactions with customers. Host Responsibility will advise use of the system when approving a customer for Re-Entry, if the customer is a gaming machine player.

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 staff 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;
- once the limit is reached, the player will be approached by either an Operations Shift Manager or Host Responsibility and asked to finish up their gambling with no further play allowed during their visit or may be asked to leave, based on the situation at hand and an assessment of risk;
- 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.

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 for customers. Copies of all Christchurch Casino brochures and other host responsibility information are available and displayed where appropriate throughout the premises, including 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 and the Problem Gambler Identification Policy 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

- Provide supporting resources for employees that will be made available when required. They will include:
 - information in the Christchurch Casino handbook for seeking help; and
 - self-help resources to assist with early self-identification and intervention, including a link or reference to an online gambling screening tool.
- Incorporate information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in host responsibility training programmes and in the RAISE (employee assistance) partner.
- 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 RAISE (employee assistance) 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.

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);
- government agencies (including DIA and the Ministry of Health).

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. The Christchurch City Council, the Police and any other agency or organisation will be invited to attend a liaison meeting when content of mutual relevance is to be raised.

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 in the local community.

Christchurch Casino will work with Class 4 organisations to maximise the effectiveness of each others' 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, with the intention to utilise natural light where possible;
- 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 (iTrak).

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 the DIA 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

Despite the ability to extend credit to customers for the purposes of gambling in circumstances approved by the Gambling Commission pursuant to section 15 of the Gambling Act 2003, Christchurch Casino maintains a policy of not extending any credit to any customer for the purposes of gambling.

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. Any recommendation to any promotion's structure, creative elements (i.e., imagery) or messaging made by Host Responsibility must be considered by the proponent of the marketing activity. Any changes to a promotion which are required by Host Responsibility must be adopted.

Consultation includes consideration of the following principles, specifically 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:
 - encouraging customers to participate beyond their limits of time or money?
 - discouraging customers from taking breaks?
 - promoting gambling as a means of relieving financial or personal difficulties?
 - stating or implying that gambling is a means of winning or paying for household staples, education or housing commitments?
 - promoting 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?

Loyalty Programme

Christchurch Casino's loyalty programme provides members with benefits such as the free parking and birthday specials. It also provides members with the opportunity to earn points from gambling activity and on-site spend which can be redeemed for rewards.

The loyalty programme consists of three membership tiers. Once sufficient loyalty points have been earned, a member may upgrade to a higher tier. As part of the tier upgrade process, members are required to certify prior to each upgrade that they are comfortable with their level of gambling, and that their gambling is affordable and not at a level that is causing harm, or may cause harm, to themselves, their family or other people.

Before a customer is invited to join the top tier, Host Responsibility must undertake a review of their interactions, observations and assessments in the casino's Incident Reporting and Risk Management System (iTrak) to identify possible gambling harm. Host Responsibility must also undertake an assessment of gaming affordability, including a source of wealth and funds check.

If a gambling harm and/or affordability review is not completely satisfactory, the customer must not be upgraded, and Host Responsibility must proceed in accordance with the requirements of the Programme.

2.8 Display of signage and provision of gambling 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 (including via dedicated floor stands throughout the premises);
- 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 a 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 'gaming machines' brochure, produced by Host Responsibility and 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 online, 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

All 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, Security & Customer Care or Host Responsibility.

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, Security & Customer Care or Host Responsibility.

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, Security & Customer Care or Host Responsibility is not available.

Supervisor/Manager, Security & Customer Care and Host Responsibility: These roles are the first point of contact for escalation for indicators of harm. Depending on the circumstances, the supervisor/manager, Security & Customer Care or Host Responsibility deliver 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, Surveillance, 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 complete online training prior to commencement of operational shifts. If online training is not possible for whatever reason, classroom-based training will be delivered instead, and prior to the employee commencing operational shifts. 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 supplements this Induction training by ensuring that these employees also complete an online (or 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.

Training for Certificate of Approval holders/'licensed' employees (Level 2)

Employees who hold a Certificate of Approval (issued by the DIA to work with gambling equipment or information), as well as other employees where it is believed to be beneficial, will participate in supplementary Level 2 training. This training is to be undertaken as soon as practicable after commencement or promotion to a 'licensed' or supervisor/manager position. The training includes information on:

- identification of problem gamblers;
- overview of the legal framework and Host Responsibility Programme;
- Host Responsibility SOPs (as related to the employee's role or area of work);
- 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 is tailored to the employee's responsibilities, department or area of work and includes both theoretical and practical components. The training may include, depending on the responsibilities of the employee's role:

- Christchurch Casino's legal and regulatory requirements;
- identification of problem gamblers;
- intervention including brief interventions, de-escalation and motivational interviewing;
- receiving third-party concerns;
- processing of Exclusion Orders;
- debriefing and employee support;

- problem gambling treatment processes;
- cultural awareness;
- understanding pre-commitment and setting limits for Electronic Gaming Machine customers;
- advanced Responsible Service of Alcohol – intervention and slowing service;
- awareness of employee gambling-related harm; and
- suicide awareness.

Refresher training

Christchurch Casino provides department-based/site-wide refresher training on an ongoing basis. Refresher training is required to be completed by all employees at Christchurch Casino on an annual basis and includes both problem gambling awareness and the responsible service of alcohol. Refresher training is also provided when a learning and development need is identified or requested.

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 & Customer Care Team Managers and Host Responsibility 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 they are 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.

A copy of the report will be sent to the Secretary for Internal Affairs.

	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 instances where a customer has been detected gaming continuously for 10 hours. 	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
<ul style="list-style-type: none"> 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" 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
• Post-promotion analysis.	Christchurch Casino	Annual

Appendix A – Current Host Responsibility Resources

(as at April 2024)

Brochures

“PlaySafe DrinkSafe”- Your Guide to Customer Care

Aimed at encouraging customers to play and drink safely while at Christchurch Casino and advise them of support available via Host Responsibility and external providers for problem gambling and alcohol-related issues. The brochure is translated to reflect our customers.

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

“Your guide to understanding gaming machines & Pre-Commitment (setting limits)”

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

“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.

Signage

“DrinkSafe”

Aimed at encouraging customers to consume alcohol responsibly.

“PlaySafe”

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

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

A poster promoting assistance via both Host Responsibility and external providers.

“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+).

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:

- Information Collection and Collation;
- Analysis and Intervention;
- Repeat ATM visits;
- Cash Desk declined transactions; and
- Exclusion and Re-entry.

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 indicator 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;
- Begging;
- Falling asleep at a machine or table;
- Severe emotional distress due to gambling, including crying or expression of suicidal thoughts; or
- 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;
- Breaching pre-commitment limits and/or an increase or disabling of pre-commitment limits; or
- 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;
- 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 requirements.

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 iTrak.

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 iTrak to record, manage, review and assess all information about all customers on the database, including Gamblers of Interest and excluded or banned customers.

CUSTOMER DISCLOSURES

Customer disclosures may or may not make reference to the person's gambling (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 iTrak 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 iTrak by the supervisor/manager so as to make the record of the disclosure or observation available to Host Responsibility as soon as practicable. The reported disclosures and observations form part of the body of information upon which assessments of problem gambling are to be made.

CUSTOMER DATA INCLUDING LOYALTY

High levels of frequency and expenditure are indicators (see Section 2). 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 the Customer Due Diligence process required to be completed by all members of the Loyalty Programme, as well as discussions with the customer or other parties, there may be information or 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 iTrak 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 iTrak 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 iTrak 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 (iTrak) and made available to Host Responsibility as soon as practicable.

Section Four – Identification

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

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

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 Sections 3 and 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.

Christchurch Casino has systems in place to assist with notifying key employees immediately to both 'strong' and 'general' indicators of problem gambling. Responses to certain notifications are on an 'ASAP' basis, meaning that an immediate response is required and hence is prioritised. Christchurch Casino ensures that there are at all times a sufficient number of suitably-trained employees that can respond to such indicators with the urgency required.

Consequences of Identification

Once identified as a problem gambler, Christchurch Casino must:

- (a) if it has not done so already, open an iTrak 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 harm;
- (c) issue an Exclusion Order immediately if requested to do so by the customer;
- (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 customer;

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 iTrak.

Host Responsibility uses iTrak 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. Christchurch Casino will undertake an annual literature review to seek such new evidence with a view to incorporating appropriate improvements into its Host Responsibility Programme and Policy.