

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

**AND** the amendment by the Gambling Commission of the Host Responsibility Programme for the Dunedin Casino

**BEFORE THE GAMBLING COMMISSION**

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

Dates of Decision: 4 November 2022, 6 September 2023 and 12 April 2024

Date of Notification  
of Decision: 19 June 2024

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

**Introduction**

1. Dunedin Casinos Management Limited (“**DCML**”) is licensed to operate the Dunedin Casino. Although the casino was rebranded as the “Grand Casino” in 2021, for reasons of clarity and continuity, the Commission refers to it in this decision under its former name, Dunedin Casino. Condition 29 attached to DCML’s operator’s licence requires the Gambling Commission to review the Host Responsibility Programme (“**HRP**”) for the Casino every three years.
2. By this decision, the Commission amends the HRP for the Dunedin Casino, approved by the Commission in decision GC20/19, by replacing it with the revised HRP attached to this decision. The HRP includes the Problem Gambling Identification Policy (“**PGIP**”) required for the Casino.

**Process**

3. The Commission is required under the licence conditions to review DCML’s HRP every three years. DCML’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 GC20/19, that replaced the then existing HRP with a new approved HRP.
5. In June 2022, DCML submitted its revised HRP and PGIP for consideration. The Commission understands that DCML met with the Department of Internal Affairs ("**DIA**") prior to submitting the proposed new HRP.
6. The following potentially interested parties were invited to make submissions on DCML's proposed revised HRP:
  - (a) the Secretary for Internal Affairs ("**Secretary**");
  - (b) Ministry of Health ("**MoH**");
  - (c) Dunedin City Council;
  - (d) Southern DHB;
  - (e) PGF Group; and
  - (f) Salvation Army Oasis ("**SA**").
7. Submissions were received from the Secretary, MoH and SA.
8. On 11 August 2022, the Commission forwarded the submissions to DCML and invited it to file submissions in reply, which it did.
9. In September 2022, 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 Christchurch HRPs. As the Commission had seen the 2022 Delfabbro report, it considered it appropriate to make it available to all casino operators and submitting parties in the course of the HRP reviews.
10. 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 DCML's HRP review. DCML did not respond to the 2022 Delfabbro report.
11. In November 2022, the Commission paused the review of DCML's HRP. It did so because the Commission was also reviewing the HRPs for the four SkyCity casinos and was of the view that the review of the SkyCity HRPs might assist the Commission with the review of the HRP for the Dunedin casino because the SkyCity review generated a greater number of more detailed submissions.

12. The Commission concluded its review of the SkyCity HRP in December 2023 (decision GC09/23 – the “**SkyCity decision**”) in advance of completing its reviews of the HRP for the Christchurch and Dunedin Casinos. The SkyCity decision made extensive reference to SkyCity’s 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.
13. The Commission concluded its review of the HRP for the Christchurch Casino in May 2024 (decision GC04/24 – the “**Christchurch decision**”).
14. On 16 February 2024, DCML provided an updated HRP and PGIP, following the release of the SkyCity decision. On 28 February 2024, the Commission wrote to DCML and the parties who filed submissions on DCML’s application for approval of a new HRP. The Commission’s letter made reference to SkyCity’s MCP proposal, as set out in the SkyCity decision, and invited further submissions on it and any other aspects of that decision. The Commission provided a further copy of the 2022 Delfabbro report to assist parties. Further submissions were received from MoH and the Secretary.
15. The Commission first considered DCML’s proposed HRP at its November 2022 meeting. The Commission next considered the HRP at its September 2023 meeting, reaching provisional decisions on several issues. The Commission subsequently considered DCML’s proposed HRP again at its April 2024 meeting, following receipt of the further submissions, concluding its review.

### **Jurisdiction**

16. Condition 26 of the licence conditions attached to DCML’s operator’s licence sets out the matters that the Dunedin 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 DCML is required to discharge the obligations imposed by sections 308-312A of the Gambling Act 2003<sup>1</sup> concerning the identification of problem gamblers, the provision of assistance to them, exclusion procedures and record-keeping, as follows:

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<sup>1</sup> All section references are to this Act unless otherwise stated.

- (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.

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 DCML must undertake activities aimed at harm minimisation. They include the precise steps which DCML must take to comply with statutory obligations (such as self-exclusion under section 310) and impose additional prescriptive obligations for how it 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 HRP's 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.

#### **DCML's proposed HRP and PGIP**

22. DCML did not provide any submissions to support the initial amendments it proposed to make, rather it simply submitted an HRP and PGIP for the Commission to consider with the proposed changes shown in mark-up.

#### **The Secretary's submission**

23. The Secretary met with DCML prior to DCML submitting the draft HRP to the Commission. In his written submission, the Secretary proposed additional amendments to DCML's draft HRP, which may be summarised as follows:

- (a) The 5-hour threshold for continuous play assessment should be reduced to three hours.
- (b) In assessing what amounts to continuous play, breaks by patrons should be uninterrupted, rather than aggregated as they are at present.
- (c) SOPs and KPIs should be inserted into the HRP to track the casino's performance on continuous presence, continuous play and for post-identification interventions.
- (d) Uncarded play has not received sufficient attention in the HRP; uncarded players should be treated the same as carded players.
- (e) Provision should be made for post-promotion analysis.
- (f) Patrons should not be able to move automatically between loyalty tiers.
- (g) References to terms such as "every endeavour", "all reasonable endeavours" and "all practicable steps" should be changed to "best endeavours" because it imposes a higher duty on the operator.
- (h) Reporting should be increased from annual to quarterly.
- (i) One Strong Indicator should be sufficient to trigger the definition of Problem Gambler. At present, the PGIP requires the presence of one or two Strong Indicators.

- (j) Begging and multiple declined EFTPOS transactions should be included as Strong Indicators.
- (k) DCML 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) Five hours of continuous play is excessive; obligations should be imposed earlier.
- (b) Uncarded players should be treated the same as carded players.

#### **SA's submission**

25. SA submitted, in summary, as follows:

- (a) Continuous presence should be defined as being present for eight hours, rather than 12 hours.
- (b) The continuous play timeframe should be reduced from 5 hours to three hours.
- (c) Research indicates that continuous play of three hours and longer can be considered a general indicator of harm.
- (d) 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.
- (e) The Strong Indicators should be renamed "At Risk Indicators" and the "General Indicators" should be renamed "Strong General Indicators" in order to align with language utilised by Te Whatu Ora.

#### **DCML's submissions in reply**

26. DCML filed submissions in reply to the submissions filed by the Secretary, MoH and SA. DCML's responses, and the Commission's conclusions on each issue, are set out in the analysis below.

#### **Submissions in response to SkyCity HRP decision**

27. Submissions were received from the Secretary and MoH.

28. 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 to its decision on DCML's HRP.
29. 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.
30. 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 the SkyCity casinos was the priority given to imminent development of MCP at its casinos. DCML'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.
31. The MoH submissions were similar to its primary submissions, noting that five hours of continuous play is excessive and that twelve hours of continuous presence is unreasonable for smaller casinos like those in New Zealand which do not have many non-gambling activities.
32. MoH noted that having an MCP system would allow for better understanding of how many and what proportion of patrons are hitting the limits for continuous play and continuous presence in the current environment. Having MCP across both casinos and Class 4 would be a huge step forward for harm minimisation.
33. Following the submission process, DCML proposed a series of amendments to its HRP, which included accepting the following changes proposed by the other submitting parties:
  - (a) 1.1 Statement of Position (stronger, clearer language);
  - (b) 2.0 Harm Minimisation and Prevention Components (to clarify Host Responsibility training levels);
  - (c) 2.1.8 Cashless Gambling (Title);
  - (d) 2.2 Host Responsibility Information for Customers (put Host Responsibility information on casino's website);

- (e) 2.4 Stakeholder Engagement (maximise the effectiveness of HRPs at the Casino and at class 4 venues);
- (f) 2.7 Responsible Marketing (correct name of Gambling Advertising Code);
- (g) 2.8 Display of Signage and Provision of Gambling Information to Customers (title);
- (h) 2.9 Learning and Development (include Precommitment Training);
- (i) 3.0 Monitoring and Reporting (provide report to Secretary, remove reference to HR3 training);
- (j) PGIP (Section Two – Strong Indicators (“Begging”));
- (k) PGIP (Section Two – General Indicators – Intensity and Frequency of Play – Retaining Visitation and Expenditure exemplars).

DCML opposed the other suggested changes. The basis for its opposition in each case is considered below.

### **Analysis**

34. **Section 2.0 – Harm Minimisation and Prevention components** – DIA and MoH supported an amendment proposed by DCML (for DCML to interact with uncarded players every four hours), but suggested a drafting amendment to strengthen the nature of the interaction. DCML accepted the suggestion.
35. The Commission accepted DCML’s proposal to require interaction between responsible gambling hosts and uncarded players, with amendment. It has been a feature of submissions received in the course of recent HRP reviews, including this one, that more should be done to monitor the wellbeing of uncarded players. DCML has accepted this and proposed steps to do so.
36. A requirement to interact with uncarded players every four hours is not a requirement of the SkyCity or Christchurch HRPs. The Commission generally aims to maintain reasonable alignment between HRP requirements, unless there is a good reason not to do so. In this case, the Commission considers that the proposal is sensible, constructive and worthy of adoption, with a view to considering it being adopted by other casinos on their next HRP reviews. In that regard, there are presently a number of experimental differences between casino HRPs; SkyCity is actively working towards the introduction of MCP at its venues and if introduced, uncarded players would cease to be able to gamble lawfully so special interaction obligations for them would not be required. However, both the adoption of MCP and its timing are merely prospective and in the meantime, the Commission has concluded

that it is sensible to make changes at the other casinos, in case the introduction of MCP does not proceed as quickly as originally hoped.

37. To be clear, the new obligation is not intended to operate as a form of “safe harbour”. The obligation is additional to the other obligations in the HRP, including the interaction and monitoring obligations in relation to continuous presence and continuous play, and the PGIP.
38. **Section 2.1.1 – Exclusion – Other Measures** – The Secretary submitted that references to “all practicable steps” be substituted for “best endeavours” because this imposes a higher duty on DCML. The Secretary made similar submissions elsewhere in the HRP in relation to phrases such as “reasonable endeavours” and “every endeavour”.
39. The Commission considered and rejected a similar submission in the SkyCity decision (see paragraphs 128-129) and the Christchurch decision (see paragraphs 40 and 41). In those decisions, the Commission expressed a preference for the language of the HRPs to be consistent with the language of the applicable underlying legislation, and doubted that the subtle effect of the proposed amendment was as clear as suggested. The Commission declined to adopt the Secretary’s submission on this review for the same reasons.
40. **Section 2.1.6 – Long hours of play – Continuous Presence** – SA submitted that the threshold for Continuous Presence should be reduced from 12 hours to eight hours because 12 hours is unreasonable. In reply, DCML noted that it very rarely has any regular players on site for anywhere near 12 hours. When it hosts tournaments or events, some players are present for extended periods of time, but they usually have meal breaks or go off-site for events.
41. Continuous Presence is distinguishable from Continuous Play, with Continuous Presence being when a patron is present at the Casino without necessarily undertaking any gambling. The HRP sets out a series of steps that DCML must undertake when a customer has been continuously present at the casino for 12 hours; from notifying an Authorised Person through to potential removal from the Casino. The Commission was generally satisfied with DCML’s proposed approach to Continuous Presence but restored the drafting approved by the Commission in the previous decision (GC20/19) in order to retain flexibility and consistency with other HRPs.
42. The Commission noted that the Casino’s usual hours of operation are from midday to midnight from Sunday to Thursday, and from midday to 2am on Fridays and Saturdays, meaning that a patron would need to be at the Casino for the entire opening hours for five of the seven days in order to be continuously present, and for all but two hours on Friday and Saturday nights.

43. **Section 2.1.6 – Long hours of play – Continuous Play** – DCML’s HRP presently imposes special continuous play engagement and monitoring obligations once a customer has been gambling continuously for five hours or more. Submitters were of the view that five hours of continuous gambling is too long for a trigger of those special obligations and that the 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 referred to research which it said indicates that continuous play for three hours and longer can be considered a general indicator of harm. MoH submitted that continuous play for 5 hours is excessive.
44. DCML submitted that the Commission debated this issue at length in 2015, determining that five hours was the appropriate timeframe for continuous play. DCML further submitted that the five hour timeframe works well and is consistent with the other New Zealand casinos.
45. In their further submissions in response to the SkyCity decision, the Secretary and MoH maintained their views 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 DCML HRP.
46. 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.
47. This issue was considered extensively in the SkyCity and Christchurch decisions. In paragraphs 33-44 of the SkyCity decision, the Commission set out the history of this matter, including the expert advice of Professor Delfabbro in 2015 and 2022. Similarly at paragraphs 50-60 of the Christchurch decision. In each of these reviews, the Commission decided not to require interaction and monitoring expressly and independently of other considerations sooner than after 5 hours of continuous play for the reasons set out at paragraph 42 of the SkyCity decision:
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.

48. As it has considered this issue twice very recently, with input from an external expert and the submissions by parties on all three reviews were largely the same, the Commission saw nothing in the recent submissions justifying departure from the conclusions that it reached in the SkyCity and Christchurch decisions in relation to the 5 hour continuous play period. Submitters on DCML’s review did not present any information that was not considered as part of the earlier reviews, including the Secretary’s submissions on the *One Foundation* decision.
49. The Commission wants to reiterate two important points made in relation to continuous play in the SkyCity and Christchurch HRP decisions. First, the Commission remains open to amending the 5 hour continuous play period if compelling new information suggests that a different timeframe would be more appropriate; merely pointing to an earlier assessment is not a compelling argument for retention of the status quo. Secondly, the continuous play staff interaction and monitoring trigger applies in the absence of any other reason to interact or monitor earlier. 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).
50. The Commission amended aspects of this section of the HRP to align it more closely with equivalent sections in the SkyCity and Christchurch HRPs.
51. **Section 2.1.6 – Long hours of play – Continuous Play** –DCML’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).
52. As with the Continuous Play time trigger, the Commission examined the nature of the breaks in detail as part of its review of the SkyCity and Christchurch HRPs. At paragraph 51 of the SkyCity decision, the Commission set out its provisional view that resetting the continuous play “clock” should require a 30-minute uninterrupted break, rather than a number of shorter breaks totaling 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.

53. Despite reaching this provisional view, the Commission did not include this requirement in the SkyCity HRP because prior to completion of the review, SkyCity informed the Commission that it had commenced work on introducing MCP to its casinos and it asked the Commission for the opportunity to focus on this, rather than being required to develop a temporary solution for monitoring 30-minute uninterrupted breaks in line with the Commission's provisional view.

54. The Commission decided that the anticipated benefits of MCP were sufficient to justify priority being given to its early introduction ahead of the introduction of an uninterrupted 30-minute break. Paragraphs 58 and 59 of the SkyCity decision set this out as follows:

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.

59. The Commission confirms its future intention to modify the continuous play obligations by having regard only to sufficiently uninterrupted breaks in play but has decided not to amend the current continuous play requirements of the HRPs pending introduction of MCP within the next 12-18 months.

55. The Commission considered this issue again as part of its review of the Christchurch HRP. In particular, the Commission considered whether it should take the same approach for the Christchurch Casino as it did for the SkyCity venues and defer the introduction of the 30-minute uninterrupted breaks (see paragraphs 61-74 of the Christchurch decision). The Commission decided not to defer the introduction of 30-minute uninterrupted breaks and amended the HRP for the Christchurch Casino to include this requirement. At paragraphs 70–73 of the Christchurch decision, the Commission stated as follows:

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.
56. The Commission considered the nature of the breaks in play for DCML’s HRP. In his primary submissions, the Secretary submitted that the 30-minute break should be uninterrupted, rather than aggregated. In reply, DCML submitted that a number of smaller breaks are more advantageous to players than a 30-minute (uninterrupted) break after 5 hours of play. DCML submitted that the current drafting of the section is appropriate.
57. In his 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 has deferred doing so to allow SCML to prioritise introducing 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 DCL’s HRP is opposed. In the absence of a commitment by DCL to adopt MCP, it should not be assumed that it will adopt this technology or that DCL will support a single national system. Delaying the adoption of a 30-minute uninterrupted break without such a commitment therefore exposes problem gamblers to unnecessary risk.
58. DCML filed no submissions in response to the SkyCity decision.
59. The Commission decided to impose a 30-minute uninterrupted break as part of the assessment of continuous play at the Dunedin Casino.
60. As it noted in Christchurch decision, the Commission reached the provisional view in the SkyCity decision that resetting the continuous play “clock” should require a 30-minute uninterrupted break, following expert advice from Professor Delfabbro. The Commission did not immediately amend SkyCity’s HRPs to include this requirement only because it decided that the early introduction of MCP should be prioritised above its provisional decision to require 30-minute uninterrupted breaks. The Commission then noted that Christchurch Casino’s position differed from SkyCity’s in that the Christchurch Casino was

not leading the development of MCP and there was nothing to suggest that having to monitor lengthy gambling sessions by including only uninterrupted 30-minute breaks would likely delay implementation of MCP at that casino. The Commission also noted that doubts that MCP would be implemented as soon as SkyCity earlier indicated were a further reason not to delay the change at other casinos.

61. The Commission's analysis of this issue for the Christchurch Casino is equally applicable to the Dunedin Casino. Unlike SkyCity, DCML is not leading the development of MCP, nor did it submit in favour of it; indeed, DCML offered no submissions which would lead the Commission to conclude that 30-minute uninterrupted breaks should not be introduced immediately. The Commission amended the HRP accordingly.
62. **Section 2.1.6 – Long hours of play – Continuous Play** – The Secretary submitted that SOPs and KPIs should be inserted into the HRP to track the Casino's performance on continuous presence and continuous play. In reply, DCML submitted that there is no need for KPIs and that all interactions involving the continuous presence and continuous play are recorded into iTrak.
63. Consistent with other HRPs, the Commission saw no need to insert KPIs or SOPs into this section of DCML's HRP. Indeed, the Commission has previously expressed a reluctance to insert unnecessary KPIs out of a concern that they may result in unintended consequences. Further, and as noted in the SkyCity and Christchurch decisions, the introduction of MCP is expected to have a significant impact on the oversight of casino gambling in New Zealand, including in the area of continuous play.
64. The Commission has also explained what it sees as the essential difference between the purposes of SOPs and HRPs and indicated that it intends to review the SOPs for the SkyCity and Christchurch Casinos and incorporate any suitable provisions into the next iteration of the HRPs. The Commission will do the same for DCML's HRP.
65. **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, and that uncarded players should be treated the same as carded players. SA submitted that a casual card system should be available.
66. In reply, DCML submitted that it treats uncarded players the same as carded players. Further, it is installing Servizio and looking at enhancing its facial recognition software, to assist in the identification of casino patrons, including uncarded players.

67. Despite what DCML claims, it is apparent to the Commission that the ease of monitoring the gambling of customers using a loyalty card differs from gambling without use of a loyalty card which logs the activity of an identified customer. It accepts that DCML recognises that it has the same essential obligations to all customers but ease of monitoring is the reason that SA advocated the adoption of a casual card system. As noted in paragraph 35 above, DCML has proposed additional steps to check on the welfare of uncarded players periodically. The anticipated eventual introduction of MCP is expected to resolve the issue of difficulty in monitoring uncarded gambling because, once introduced, there would be no uncarded players to monitor separately. This matter will be revisited during the next review. In the meantime, the Commission does not regard it as practical or useful to address a casual card system which does not appear to exist currently and which would not be required if MCP were imposed.
68. **Section 2.7 – Responsible marketing – Requirements** – The Secretary submitted that provision should be made for the post-promotion analysis of marketing initiatives. In reply, DCML submitted that it is doing this already, including forwarding its results to the DIA. The Commission amended section 3.0 to formalise the requirement for DCML to undertake post-promotion analysis.
69. **Section 2.7 – Responsible marketing – Requirements** – The Secretary submitted that patrons should not be able to move automatically between loyalty tiers. In reply, DCML submitted that all players who move up to the top three tiers will be approached and have an interaction done with them before promotion to the next tier is confirmed. DCML amended section 2.2 of the HRP to address tier promotion.
70. The Commission amended DCML's drafting and moved the obligation to section 2.7, consistent with the SkyCity and Christchurch HRPs. DCML will be required to assess risk of harm before customers are permitted to progress up the loyalty tiers at the Grand Casino Dunedin.
71. **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, DCML submitted that it saw no need for change.
72. Consistent with the SkyCity and Christchurch decisions, the Commission saw no need to amend this section of the HRP to require quarterly reports. 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.

73. **PGIP – Section 2 – Indicators of Problem Gambling** – SA submitted that the General Indicators should be renamed “At Risk Indicators” while “General Indicators” should be renamed “Strong General Indicators”.
74. The Commission rejected an identical submission by SA on the review of the SkyCity HRPs. At paragraph 114 of the SkyCity decision, the Commission stated as follows:
114. The Commission has previously rejected suggestions that it change terms which are well-established, understood and applied in New Zealand’s HRP context in favour of new terms which are seen as conveying a subtle change in messaging or better alignment with current clinically preferred terms. It declined to do so in this case as well for the same reasons. The Commission considers that changing well-established terms, such as “Strong Indicators” and “General Indicators” should only occur when the reasons are unusually compelling and likely to result in clear benefits, which seem to be lacking in this case. The Commission noted that, in the 2022 report, Professor Delfabbro saw no compelling reason for change.
75. The submission advanced no new information or argument which would justify a change in the Commission’s view and it declined to make the proposed change for the same reasons.
76. **PGIP – Section 2 – Indicators of Problem Gambling – General Indicators** – The Secretary submitted that begging and multiple declined EFTPOS transactions should be moved to become Strong Indicators because they suggest that a patron may have exhausted their funds.
77. DCML accepted that begging should become a Strong Indicator but disagreed that multiple declined EFTPOS transactions should also be relocated, submitting that there are many reasons why EFTPOS transactions are declined.
78. As part of the SkyCity review, the Strong Indicators were amended to include begging and falling asleep at a table or a machine, but not multiple declined EFTPOS transactions because these are more appropriately positioned among the General Indicators than the Strong Indicators.
79. On the information currently before it, the Commission sees no reason to adopt different indicators for DCML than those approved for the SkyCity and Christchurch HRPs. The Commission made a number of minor amendments to DCML’s PGIP so that the indicators align more closely with those recently approved in the SkyCity and Christchurch decisions. This includes amending the Intensity and Frequency of play indicators, to reflect that a single increase or disabling of a pre-commitment limit constitutes an indicator whereas currently, multiple increases are required.

80. **PGIP – Section 2 – Indicators of Problem Gambling – Introduction** – The Secretary submitted that the presentation of only one strong indicator should be sufficient to trigger the definition of a problem gambler. At present, the PGIP states that the presentation of “one or two” such indicators is usually sufficient. DCML submitted that the current drafting is sufficient.
81. Consistent with the SkyCity and Christchurch decisions, the Commission amended this section of the PGIP 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.
82. **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. DCML disagreed, submitting that it sees no need to put timeframes on interactions because they are usually undertaken immediately.
83. In the Commission’s view, SOPs and HRPs have different purposes and it does not consider that development of new SOPs is an appropriate matter to consider in HRP reviews. On the question of the inclusion of KPIs in HRPs, the Commission considered and dismissed a similar submission in the Christchurch decision, as follows:
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.
84. Consistent with that view, a decision to include KPIs is not something that the Commission is prepared to consider seriously in principle only, without any detail of the measures proposed, the reasons for them and careful consideration of possible adverse unintended consequences. The Secretary’s submission merely advanced one example but even that lacked detail. A KPI in the nature of the example given raises questions such as whether imposing a target time for intervention after identification might affect identification decisions and their timing in a manner which defeated the underlying intent. The Commission did not amend the proposed HRP to include KPIs.
85. **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. DCML submitted that its PGIP is a minimum standard and it frequently exceeds what is requested of it.

86. The Commission noted that other PGIPs contain a similar obligation and saw no reason why it should not be included in DCML's PGIP.
87. Finally, the Commission made a number of changes to DCML's HRP and PGIP to improve their clarity and to align them better with the SkyCity and Christchurch documents, where appropriate.

### **Conclusion**

88. The Commission amends the HRP for the Dunedin 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 **22 July 2024**, replacing the HRP approved by the Commission in decision GC20/19.



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Susan Hughes KC  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

19 June 2024



# GRAND CASINO

*Host Responsibility  
Programme*

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**1.0 Introduction**

Approval      Effective date: 22 July 2024

Manager: \_\_\_\_\_  
Dominique Dowding  
Chief Executive Officer

\_\_\_\_\_  
Geoff Purdon  
Security, Surveillance & Host Responsibility Manager

## **1.1 Statement of position**

### **Statement of position**

Grand Casino is committed to providing an environment that promotes safe gambling and is vigilant in preventing harm that can be caused by gambling. It provides a fun and safe environment for all customers and staff.

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

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

### **Compliance with legal obligations**

The Programme has been developed by Grand Casino and addresses the host responsibility conditions in the Casino Operator's Licence held by Dunedin Casinos Management Limited.

Standard Operating Procedures (SOPs) developed by Grand 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 Grand 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;
- facilitating responsible gambling.

Grand Casino aims to fulfil these objectives by:

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

### Outcomes

Grand 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 the achievement of Programme objectives are set out in section 3.

## 2.0 Harm minimisation and prevention components

### Introduction

Grand 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 environment;
- marketing practices;
- display of signage and provision of gaming information to customers;
- learning and development;
- identification of problem gamblers; and
- gambling limitation.

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

### Roles and Responsibilities

Frontline staff at Grand Casino are:

- Chief Executive Officer;
- all staff who have contact with customers (e.g. Gaming, F&B, Cash Desk, Housekeeping, Customer Services, Marketing and Security);
- Surveillance staff; and
- Responsible Gambling Hosts (RGH).

Authorised Persons at Grand Casino are:

- Chief Executive Officer;
- Compliance Manager;
- Security, Surveillance & Host Responsibility Manager;
- Security, Surveillance & Host Responsibility Shift Managers;
- Acting Security, Surveillance & Host Responsibility Shift Managers;
- Acting Security Manager;
- Gaming Operations Manager;
- Gaming Shift Manager;
- AML Compliance Officer;
- Cage Manager;
- Acting Gaming Shift Manager;
- Area Manager;
- Acting Area Manager; and
- Host Responsibility officers.

The Authorised Persons are HR2 trained and undertake exclusions, interventions, and interactions with patrons.

The Host Responsibility function at Grand Casino is the responsibility of the Security, Surveillance & Host Responsibility Manager. The Compliance Manager oversees the administrative aspects of the role.

This role includes the following:

- collecting, collating, recording and analysing all information relating to indicators of problem gambling;
- the collection and management of information, and observations concerning problem gambling, including dealing with problem gambling indicators, staff observations, patron interviews and third-party inquiries; and
- the ongoing monitoring and management of Gambler of Interest (GOI) files.

The role also involves interacting with customers, including:

- the provision of information and advice to patrons who Grand Casino considers may be problem gamblers;
- offering self-exclusion from the casino or enforcing exclusion;
- referring patrons to problem gambling counsellors;
- evaluating excluded patrons who wish to come back to the casino after an exclusion period has concluded. This involves:
  - staff training about host responsibility; and
  - engaging with service providers, researchers, and regulators.

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

The RGHs are part of the Host Responsibility team, and their core role is to interact with the customers in the Casino with a particular emphasis on identifying any signs of "harm" occurring. They report to an Authorised Person.

After the first hour of opening, the RGH will interact with all uncarded players and continue to do so at least every four hours, to check on their wellbeing and for signs of harmful gambling. If any interaction gives rise to immediate concern that the uncarded player is a problem gambler, the RGH must proceed as required by the Act, the Policy and this Programme.

An Authorised Person is always on-site when the Casino is open to the public.

## 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 Grand Casino's Host Responsibility Programme. The policies and procedures are consistent with the Act, Regulations, licence conditions and this Programme, and will be updated to reflect changes.

### Policies

- Problem Gambler Identification Policy

### Standard Operating Procedures:

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

- Exclusion;
- Responsible Service of Alcohol;
- Unattended Children;
- Underage Persons;
- Standard of Dress and Behaviour;
- Long hours of play; and
- Gambling Limitation.

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation;
- Analysis and Intervention;
- Indicators of Problem Gambling; and
- Exclusion.

## 2.1.1 Exclusion

### Introduction

Grand Casino offers two types of exclusions:

- Self-Exclusion; and
- Grand Casino Identified Exclusion.

Grand Casino provides the facility for Self-Exclusion of customers from the casino for a specific period between three and twenty-four months and until they meet re-entry conditions imposed by Grand Casino or by regulations made under section 316(1)(e) of the Act. A customer may request and undertake Self-Exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler or where the customer chooses to prevent or limit opportunities for harm to occur. The Self-Exclusion process may also be initiated by problem gambling treatment providers or other venues where there are multi-venue exclusion arrangements in place.

Grand Casino Identified Exclusion is for a period of up to two years and the customer must also meet re-entry conditions.

Grand Casino Identified Exclusion is undertaken where a problem gambler does not take up Self-Exclusion and Grand Casino determines that the customer, his or her family or wider community is, or may be, experiencing harm as a consequence of that person's gambling behaviour. Grand Casino imposes such an exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally made based on assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of Self-Exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. Grand Casino may also impose exclusion after a serious one-off incident where an offer of Self-Exclusion has been refused.

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

### Approaches to customers

Only HR2 trained staff may undertake exclusions with customers. This will generally be one of the Authorised Persons, but if an Authorised Person is not available, a non-Authorised Person who is HR2 trained person will undertake the Exclusion.

### Features of the Exclusion Process

To ensure the effectiveness of the Exclusion process, the person undertaking the Exclusion will:

#### Communication

- use all reasonable efforts to provide a translation service;
- provide support to the Excluded customer through the provision of materials from problem gambling counselling service providers, including their contact details;
- provide brochures in appropriate languages;

#### Third parties and service providers

- emphasise culturally appropriate processes and, wherever possible and appropriate, encourage family and/or friends to accompany the customer;
- encourage 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;
- encourage the Excluded customer to nominate a counselling service;
- arrange for the counselling service to call the Excluded customer if the Excluded customer agrees;

- encourage the Excluded customer to contact a counselling service as soon as possible after their exclusion.

#### **Other measures**

- provide an updated database that is accessible to Security and Surveillance staff, as well as Gaming Managers and Acting Gaming Managers, to ensure detection of customers breaching an Exclusion order;
- promote ongoing dialogue with counselling service providers to continually improve the Exclusion process;
- provide the customer with an opportunity to immediately redeem all loyalty points for rewards and suspend sending all loyalty information to the customer;
- require timely action from staff if a customer requests Self-Exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone;
- provide the opportunity for a customer to self-exclude off-site, e.g. problem gambling service providers can mail in requests for Exclusions.

#### **Breaches**

Grand Casino staff are required to be vigilant for any Excluded customer who attempts to re-enter the casino. Grand Casino Security/Surveillance Managers or other Authorised Persons 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 Grand Casino Host Responsibility team regularly reviews the Exclusion process and when appropriate, makes improvements. The reviews may involve seeking customer and staff feedback through informal research processes.

#### **Loyalty Card Holders**

Grand Casino must remove from the Loyalty programme all Excluded and Trespassed customers.

The Grand Casino Surveillance staff members responsible for the administration of the Exclusion and Trespass records or the Authorised staff member undertaking the particular Exclusion must ensure that:

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

The Authorised Person administering the Exclusion or Trespass must:

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

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

## 2.1.2 Responsible Service of Alcohol

### Background

The Grand Casino Responsible Service of Alcohol Programme is designed to provide an environment that is safe and enjoyable. A key component is the Grand Casino Responsible Service of Alcohol training programme, which is designed for all frontline staff, to promote effective teamwork to ensure customer safety and enjoyment.

Grand Casino's Responsible Service of Alcohol Programme reflects principles which are derived from the Health Promotion Agency's "Creating a Responsible Drinking Environment - Host Responsibility: Guidelines for Licensed Premises 2018".

A responsible host:

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

### Approach

The following is Grand Casino's Programme regarding the Responsible Service of Alcohol:

- Grand Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Grand Casino will ensure that it observes the provisions of the Sale and Supply of Alcohol Act 2012 (Alcohol Act) relating to the permitted hours within which customers can be sold and supplied alcohol, and customers and staff are permitted on licensed premises.
- Grand Casino maintains an effective Responsible Service of Alcohol training programme to train and inform all frontline staff on the responsible sale and supply of alcohol.
- All Grand Casino frontline staff undergo training on the Responsible Service of Alcohol during their induction. This includes the recognition of excessive alcohol consumption traits. This is also addressed as part of the HR1 Level training. Within three months of commencing employment at Grand Casino these staff are required to attend a more formal training session on responsible service of alcohol.
- Grand Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Grand Casino takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
- Any customer who appears under the age of 25 is asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, the customer is not served or supplied with any alcohol.
- Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of staff of similar social/ethnic background to the 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, without referral to a more senior employee.
- At all times when alcohol is sold or supplied to members of the public, there is a manager on duty who holds a current Manager's Certificate under the Alcohol Act.
- No complimentary alcoholic drinks will be supplied to customers participating in gaming without the knowledge of the Acting Area Manager or above. 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 Grand Casino must agree to abide by the Grand Casino Responsible Service of Alcohol Programme and procedures regarding Responsible Service of Alcohol.
- Customers may not bring alcoholic beverages onto the premises where beverage service is provided unless prior approval has been given.
- Grand Casino will ensure that a reasonable range of non-alcoholic drinks is available at reasonable prices.
- Grand Casino will ensure that a reasonable range of low-alcoholic drink is available.
- Grand Casino will ensure that a reasonable range of food is available at all times in portions suitable for a single customer, at reasonable prices, and within a reasonable time of being ordered.
- Grand Casino will readily provide free, comprehensive, and accurate information to customers about the forms of transport available from the premises.
- Free water will always be available to customers.

### 2.1.3 Unattended children

#### **Background**

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

#### **Approach**

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

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

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

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

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

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

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

## 2.1.4 Underage persons

### **Background**

Grand Casino is committed to keeping minors out of the casino. Grand Casino will rigorously enforce the prevention of under-age gambling in its casino.

### **Approach**

Grand 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 Grand Casino frontline staff must include the need to be particularly vigilant for the presence of under-age persons.

Any Grand Casino staff member has the authority to approach suspected under-age persons and seek identification for proof of age.

## 2.1.5 Standards of dress and behaviour

### Background

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

### Dress Code

Grand Casino requires a neat and tidy standard of dress.

While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at Grand Casino:

- torn clothes (except for fashion wear);
- gang patches or other insignias;
- offensive logos;
- dirty clothes or footwear; or
- hats, caps, or sunglasses (unless for religious or medical reasons or those participating in Texas Hold'em poker).

### Behavioural Standards

If a customer is detected:

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

then Grand Casino staff must:

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

Customers exhibiting undesirable behaviour may be trespassed, excluded, or denied entry.

## 2.1.6 Long Hours of 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 (“clock”). The clock is reset after a customer has had a break from being present at the casino for six hours or more.

As a general rule:

- 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 an Authorised Person. 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/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.

If one or more of the Strong Indicators is observed, Host Responsibility or one of the Authorised Persons 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 iTrak.

iTrak is Grand 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 general rule:

- when a customer has been observed to be continuously gambling for five hours without a break of at least 30 uninterrupted minutes, the observing staff member must notify an Authorised Person 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 course of the interaction, the customer gives cause for concern, staff must encourage breaks or take stronger measures as required by 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, 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 an Authorised Person 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 iTrak.

**Uncarded players**

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

## 2.1.7 Gambling limitation

### Pre-Commitment

Grand 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 50% of their set limit with a further notification when 90% 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.

If it is established that a patron has reached their pre-commitment level and they have continued to gamble with or without their card in the machine, the player will be required to leave the casino immediately and not return for a minimum of 24 hours.

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

Gaming Staff or an Authorised Person will proactively encourage the use of this system, where appropriate, during interactions with customers.

The features of the voluntary Pre-Commitment system include:

- access to the Pre-Commitment facility via Grand Casino's loyalty card; and
- 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;
- a loyalty member's workstation;
- an 'approaching limits' and 'reached limits' notification will be displayed on the gaming machine;
- if limits are shortened; the effect will be immediate;
- once the limit is reached, no more loyalty points may be accumulated or entries to promotions earned and the player will be asked to finish up their gambling and leave;
- Host Responsibility must be alerted once limits are breached, increased, or disabled;
- no loyalty points can be earned by a player for the 24 hours following a limit being reached; and
- the system will provide information, support, and advice to the operational business units.

## 2.1.8 Cashless Gambling

Grand Casino provides for cashless electronic gaming machine (EGM) play. This play may be facilitated by a Secure Electronic Transfer (SET) for loyalty programme 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; and
- cash out in cash with no greater than a \$20 denomination, a single ticket up to a maximum of \$500.

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

- either by ticket acceptance or accept cash equivalent credits for play up to a maximum of \$5,999; or
- print or issue a single ticket up to a maximum of \$5,000 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 ticket up to a maximum combined ticket value of \$500; and
- cash out \$500 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, accept cash equivalent credits for play;
- up to a maximum of \$5,999; and
- print or issue a single ticket up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay.

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

- enhanced staff awareness of the risks associated with cashless gambling;
- provide the number of patrons identified as potential problem gamblers to the Gambling Commission as part of its annual HRP reporting.

## 2.2 Host Responsibility information for customers

### Customer Information Resources

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

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

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

## 2.3 Employee gambling-related harm

### Introduction

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

### Background

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

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

These measures are intended to address the operator licence condition:

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

### Requirements

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

Grand 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 staff that will be made available when required through appropriate channels. They will include:
  - information in the Grand Casino handbook for seeking help;
  - self-help resources to assist with early self-identification; and
  - intervention;
- include information about personal problem gambling and underlying risk factors (such as depression, debt, and alcoholism) in host responsibility training programmes and in the Employee Assistance Programme (EAP); and
- promote awareness about self-assessment and self-help resources and encourage staff to use these resources themselves to assist with early identification and intervention.

### Policies and procedures

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

### Recruitment

- assess all job applicants for evidence of problem gambling (via questions in job application forms);
- decline applications from those who are identified as problem gamblers either through their screening results, or disclosure of relevant indicators (as set out in the Grand Casino Employment Application Form) during the recruitment process and provide appropriate information, advice and assistance; and

- respond to applicants identified as problem gamblers who are also customers in accordance with the Grand Casino Host Responsibility Programme.

**Support for staff**

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

## 2.4 Stakeholder engagement

### Background

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

### Approach

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

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

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

Grand Casino will invite representatives from:

- treatment service providers including the Problem Gambling Foundation and Asian Family Services;
- public health providers;
- University of Otago; and
- government agencies, including DIA, Police and the Dunedin City Council.

Grand Casino will keep membership of these meetings under review to maintain relevance to Grand Casino's current or evolving policies and practices.

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

Grand Casino will engage with Class 4 organisations to maximise the effectiveness of each other's Host Responsibility Programmes.

Grand Casino will make available to the liaison group, a copy of the report provided to the Commission under Section 3 of this programme

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

## 2.5 Environmental design

### Approach

Grand 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 Grand 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 staff; and
- location of problem gambling and other information resources; Access criteria, including dress codes and age restrictions.

### Requirements

Grand Casino shall in its environmental design seek to ensure:

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

### Other regulatory processes

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

## 2.6 Safe gambling environment - Gaming machine play

### Requirements

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

## 2.6.1 Safe gambling environment - third party loans for financial gain

### Legislation

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

### Policy

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

### Requirements

- Grand Casino will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- Grand Casino will take all reasonable steps to identify and exclude persons at the Casino offering loans for financial gain. To assist this process Grand Casino will maintain a Standard of Dress and Behaviour SOP which shall explain how Grand Casino will identify, investigate, and respond to persons at the Casino suspected of offering loans for financial gain.
- Where Casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, Grand Casino will investigate and act in a timely manner. This process is outlined in the Grand Casino Standard of Dress and Behaviour SOP.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, Grand 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, Grand 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, Grand Casino will issue that person with a trespass notice.
- Grand Casino will notify the DIA Gambling Inspectors in accordance with MOS (Minimum Operating Standards) for Records and Notification. Where appropriate, Grand Casino also notifies relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e. not the Casino), Grand 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 Grand Casino Identified Exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm. Grand Casino will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

## 2.6.2 Safe gambling environment - Cheque retention

### Policy

Grand Casino does not accept cheques.

## 2.7 Responsible Marketing

### Legislation, industry codes

Grand 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 2019"; and licence conditions.

### Requirements

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

Grand 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 Grand Casino's loyalty programme.

The Security, Surveillance & Host Responsibility Manager will also consult on this process with the Chief Executive Officer and Compliance Manager.

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

Dunedin Casino's loyalty programme provides members with benefits such as discounts on food and beverage and the ability to earn points while gambling. 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 five 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 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 Grand Casino.

A description of how Grand 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

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

### Display of signs, brochures, clocks, website

Grand Casino ensures that:

- Host Responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of Grand Casino visitors;
- brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations;
- all gaming machines and gaming tables at Grand Casino display problem gambling helpline telephone numbers. The public telephone in the Gambling Area and the phone at the front entrance foyer will also have gambling helpline numbers, as will the ATM at the entry to the Casino. Grand Casino has many brochures around the Casino in a variety of languages; and
- clocks are on display in the Grand Casino Gambling Area.

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

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

Grand Casino has a host responsibility section on its website.

### Display of game rules, permissible bets, 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 that staff are unable to accept tips.

### Display of game rules, permissible bets, payment of winning bets for Electronic Gaming Machines

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

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, the Gaming Manager or Area Manager will explain this and can provide a "How to Play" brochures that are available to assist patrons.

**Display of game rules, odds of winning and information of problem gambling for Fun Play Tables**

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

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

**Display of Host Responsibility information in open areas where there are gaming machines**

Information on problem gambling and responsible gambling is displayed at the point of entry and throughout the Casino on the gambling floor.

**Information requests by customers**

Customers wishing to seek further clarification of game rules will on request be shown in written form the rule that is applicable.

**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.

Where possible non/carded players will also be supplied with as much information as available on their gambling activity.

## 2.9 Learning and development

### Introduction

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

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

Grand Casino's learning and development resources approach employs established models of best-practice and includes a training mix of classroom based, and on-the-job coaching. Learning and development resources are tailored depending on the roles and responsibilities of staff, and their required host responsibility customer interactions.

### Overview of Staff Roles

#### Staff:

All staff, regardless of their position at the Casino, are trained to identify indicators of harm. Staff are expected to refer the observation of indicators to a supervisor/manager.

All staff are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Staff have a primary role in being alert to and identifying indicators of harm and will report observations of concern to a supervisor/manager. While it is not their primary role, frontline staff are trained and will approach customers themselves in circumstances, for example, where a matter is urgent, or a manager/supervisor/Authorised Person is not available.

#### Supervisor/Manager:

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

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

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

#### Authorised Persons:

Authorised Persons are responsible for undertaking interventions.

An Authorised Person has been trained in HR Levels 1 and 2. They are responsible for approaching customers and undertaking interactions, interventions, and exclusions. In an emergency a suitably trained HR2 trained person may undertake the above roles.

Authorised Persons are also responsible for ensuring that all observations of indicators reported to them, and any follow-up responses, are logged and sent to the Managers Host Responsibility group.

Authorised Persons also record interactions and interventions they undertake themselves.

Authorised Persons are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

**Host Responsibility:** Host Responsibility records, collates, and analyses all information relating to indicators of problem gambling noted by frontline staff, supervisors/managers, and Authorised Persons. It also records interactions and interventions they undertake themselves. The information is used to undertake an assessment of risk and harm. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken. This may include meetings with customers. Host Responsibility is responsible for the ongoing monitoring and management of GOI files, feedback, and review of new information on GOI files and the provision of host responsibility advice and support to staff.

## **Learning and Development Requirements**

### **Induction Training (HR1 Level)**

All employees must participate in classroom-based training within a reasonable timeframe of commencement (within three months). Grand Casino will be introducing e-learning from March 2024. Staff will be required to undertake this learning within a month of commencing their employment.

This training includes but not limited to:

- responsible service of gambling and alcohol;
- identification of problem gamblers;
- reporting and recording procedures for observations;
- what is Pre-commitment and how it works?
- 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.

Grand Casino will work to supplement this training by ensuring that these staff also complete a written test. There will also be refresher training as noted below.

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

### **HR2 Training (HR2 Level)**

All front-line staff, and any other staff where it is believed it will be beneficial, will participate in supplementary Level 2 training. This training is to be undertaken within 6 months of commencement or promotion to a supervisor position. The training includes information on:

Identification of problem gamblers:

- initial action with respect to customers requesting problem gambling assistance;
- identification and intervention with respect to excessive alcohol consumption;
- support of staff who have intervened and debrief;
- importance of reporting;
- this training is done in conjunction with a representative from a treatment service provider;
- Grand Casino's legal and regulatory requirements;
- identification of problem gamblers;
- what is Pre-commitment and how it works?
- intervention including brief interventions, de-escalation, and motivational interviewing;
- debriefing and staff support;
- problem gambling treatment processes;
- cultural awareness;
- Advanced Responsible Service of Alcohol - intervention and slowing service;
- awareness of employee gambling-related harm;

- suicide awareness;
- exclusions;
- interactions; and
- interventions.

### **Refresher Training**

Grand Casino will provide refresher training on an annual basis, and it will be available to all staff at Grand Casino. It will be delivered in a group situation.

### **Manager's Certificate – Sale and Supply of Alcohol Act 2012**

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

### **Suicide Awareness Training**

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

### **Informal learning and development**

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

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

### **Evaluation**

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

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

## 2.10 Identification of problem gamblers

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

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

- an acceptable definition of problem gambling;
- indicators of problem gambling in the Casino; 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 the Grand Casino's website. Grand Casino must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

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

The information or advice offered must include a description of:

- the Self-Exclusion procedure available; and
- 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 operators license, 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 persons ongoing gambling or other behaviour gives reasonable cause to believe that he or she is a problem gambler.

## 3.0 Monitoring and reporting

### Introduction

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

The Grand Casino's 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 any initiatives are developed, Grand Casino may seek to amend this section of the Programme, prior to the Commission's next three-yearly review.

### Reports to the Gambling Commission

Grand 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 Grand Casino under the Programme;
- reporting against the measures specified below, including a comparison to previous data where applicable;
- Grand 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.

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
Number of customers about whom there have been observations.	Grand Casino	Annual
Number of indicators reported to Host Responsibility.	Grand Casino	Annual
Number of approaches to Grand Casino by third parties.	Grand Casino	Annual
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.	Grand Casino	Annual
Number of GOI files by: <ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Gender</li> <li>• Age</li> <li>• Preferred mode of gambling (tables/EGMs).</li> </ul>	Grand Casino	Annual
Number of interventions conducted with customers.	Grand Casino	Annual
Number of approaches to customers to offer information about self-exclusion.	Grand Casino	Annual
Number of instances where a customer has been detected gaming continuously for 10 hours.	Grand Casino	Annual
Number of Exclusions by: <ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Gender</li> <li>• Age</li> <li>• Preferred mode of gambling</li> <li>• Prompted by third party disclosures</li> <li>• Exclusion type (self/Grand Casino)</li> <li>• Timeframe</li> <li>• Following re-entry.</li> </ul>	Grand Casino	Annual
Number of exclusions by length: <ul style="list-style-type: none"> <li>• 3 months</li> <li>• 6 months</li> <li>• 9 months</li> <li>• 12 months</li> <li>• 24 months.</li> </ul>	Grand Casino	Annual
Number of customers participating in multi venue Exclusions.	Grand Casino	Annual
Number of customers participating in multi casino Exclusions.	Grand Casino	Annual
Number of customers participating in Pre-Commitment programme.	Grand Casino	Annual
Number of Excluded customers agreeing to be contacted by help services on exclusion form.	Grand Casino	Annual
Number of breaches of Exclusion by: <ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Gender</li> <li>• Age.</li> </ul>	Grand Casino	Annual
Number of successful and unsuccessful applications to re-enter following exclusion.	Grand Casino	Annual
Number of persons trespassed or required to leave for making loans for financial gain.	Grand Casino	Annual

<b>Measures relating to Responsible Consumption of Alcohol</b>		
Number of Under the Influence incidents (internal report).	Grand Casino	Annual
Number of requests for people to leave due to the amount of alcohol consumed.	Grand Casino	Annual
<b>Measures relating to Staff Training</b>		
<ul style="list-style-type: none"> <li>• HR1 courses</li> <li>• HR2 courses</li> <li>• Refresher training</li> <li>• Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level of training.</li> </ul>	Grand Casino	Annual
Staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures.	Grand Casino	Annual
Staff perceptions on the effectiveness of the Employee Gambling Harm Programme.	Grand Casino	Annual
Results of tests conducted by staff relating to host responsibility and associated policies and procedures.	Grand Casino	Annual
Staff perceptions training of the effectiveness of training.	Grand Casino	Annual
<b>Other Programme activity and compliance- related measures</b>		
Number of internal and external underage incidents.	Grand Casino	Annual
Number of unattended children.	Grand Casino	Annual
Number of unaccompanied children where the caregiver is gambling.	Grand Casino	Annual
Number of supervised children.	Grand Casino	Annual
Number of supervised children in our surrounds where the caregiver is gambling.	Grand Casino	Annual
Number of people trespassed or requested to leave the Casino for other reasons.	Grand Casino	Annual
Post-promotion analysis.	Grand Casino	Annual

## Appendix A - Current Host Responsibility Resources for Customers (as at May 2024)

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### **"Responsible gambling"** - brochure

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

### **"Odds of winning"** - brochure

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

### **"Exclusion Options"** - brochure

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

### **"Responsible Service of Alcohol Policy"** - notice

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

### **"Gambling Hotline"** - signs

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

### **"Asian Family Gambling Services"** - brochure

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

### **"Policy for Identifying Problem Gamblers"** - notice

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

### **"Brochures from Gambling Providers"** - brochures

Grand Casino has brochures from Problem Gambling Foundation, Asian Family Services and Gambling Helpline which are displayed in three areas of the casino.

# GRAND CASINO

*Problem Gambler  
Identification Policy*

*(Gambling Act 2003, sections 308-312A)*

## Problem Gambler Identification Policy

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References: Gambling Act 2003, Sections 308, 309, 309A, 310, 311 & 312A

### Objective

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Act to enable Grand 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 Grand 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 ground to believe, 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 Grand 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 Grand Casino;
- a description of how indicator data is to be used by Grand Casino to identify problem gamblers; and
- an outline of record-keeping requirements and review of the Policy.

The Policy applies to Grand Casino only.

### **Supporting SOPs**

The following SOPs provide operational guidelines relevant to the Policy:

- Information Collection and Collation;
- Analysis and Intervention;
- Exclusion; and
- Gambling Limitation.

## Section One – Definition of a problem gambler

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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

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### Introduction

Grand Casino uses many 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.

Based on research and evidence, Grand Casino has developed 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 a table.
- Severe emotional distress due to gambling, including crying, expression of suicidal thoughts.
- Children left unattended while gambling.

#### General indicators

##### Intensity and Frequency of Play

- Very high visitation frequency (for example, 5 times per week up to daily) combined with high levels of expenditure on gaming machines (for example, \$250+ lost per session) over a period of time (for example 1 month).
- High visitation frequency (for example 2 times per week or more) combined with very high levels of expenditure on gaming machines (for example, \$400+ loss per session) over a period of time (for example, 1 month).
- High visitation frequency combined with very high levels of expenditure on all forms of gambling, including table games, over a period of time.
- Very few breaks from gambling - almost continuous play.
- Increasing periods of play, and betting more each time, noted over a period of time (noting that

- gambling expenditure may reduce as the customer's financial resources are exhausted).
- Disconnect with time spent playing, including missing key times (e.g. meals), rushing when leaving machine 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.

### **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 staff about gambling outcomes.
- Possessiveness of particular machines or table spots (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.
- 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.
- Not having sufficient money to exit the car park.
- Constant demand for complements.
- 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 staff, compared to table games, making it less likely that their behaviour and emotional reactions will be observed;

- there is a stronger relationship between problem gambling and playing on gaming machines than with other forms of casino gambling; and
- electronic data gathering from gaming machines is more accurate than from table games.

**Other Observations**

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

## Section Three - Sources of Indicator Data

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

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

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

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

Host Responsibility uses 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 the 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 sent to Host Responsibility as soon as practicable to be used in making problem gambling assessments.

### **BEHAVIOURAL OBSERVATIONS**

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

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

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

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

### **CUSTOMER DATA INCLUDING LOYALTY**

High levels of frequency and expenditure are indicators (see Section 2). Grand 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 Grand Casino take steps (where it has concerns about a player's expenditure or visitation frequency) to obtain additional information that places this behaviour into context. For example, through discussions with the customer or other parties, there may be direct or indirect disclosures concerning the lack of affordability of gambling. Alternatively, staff might find that some players who spend very large amounts appear to be chasing their losses, or are making very frequent use of ATMs, or are leaving the casino and then returning with additional money. Grand 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, Grand Casino must ascertain whether the customer is a Loyalty member. Where the customer is a member of the Loyalty Programme, Grand 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.

Grand Casino will include a flag in the loyalty card database to alert relevant staff that on presentation of an active loyalty card the person presenting the card may be a banned player and that surveillance must be notified to determine this issue. 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).

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

A third-party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm and should be treated on an urgent basis. The third party must be referred immediately to an Authorised Person or Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g. via loyalty card use, if available or feasible) should be undertaken. If found, further enquiry must be undertaken, and the customer may be requested to leave the premises for a period of time. If requested to leave, Grand Casino must also provide the customer problem gambler information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

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

### INTERVIEWS WITH CUSTOMERS OR STAFF

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

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

**Staff interviews:** During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm or gambling in a way that may cause harm. This information must be recorded in iTrak and made available to Host Responsibility as soon as practicable.

## Section Four - Identification

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Section 2 highlights the indicators considered 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.

Grand 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, Grand Casino will determine, based on direct information or inference (using indicators) whether it has reasonable cause to believe that the customer is or has been gambling in a manner that has caused harm or may cause harm.

Depending on the assessment, including the perceived severity and urgency of a situation, Grand Casino provides graduated responses ranging from immediate intervention, advice, and discussion to ongoing monitoring. If there is reasonable cause to believe that a customer is a problem gambler, Grand Casino's legal obligations under sections 309-312A of the Act are engaged immediately.

### **Obligation to Identify**

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

### **Analysis of Information**

As outlined in Sections 3 and 5, all disclosures or observations related to indicators of harm noted by staff are reported to, and recorded by, the supervisor or manager and made available to Host Responsibility.

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

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

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

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

### **Identification**

#### *Strong indicators*

Direct disclosures by customers are expected to result in an immediate assessment that a customer is a problem gambler, with Grand 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 prolonged 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) Grand Casino would have reasonable grounds to consider such people to be problem gamblers.

#### **Consequences of Identification**

Once it has reasonable cause to believe that a customer is a problem gambler, Grand Casino must:

- (a) if it has not done so already, open an iTrak file;
- (b) offer information or advice 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; and
- (d) consider whether it would be appropriate to issue an exclusion order without any request to do so as a means of providing assistance to the customer.

Grand Casino will also provide contact details for problem gambling service providers.

## Section Five - Record keeping

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### **Recording, collation, and analysis of information**

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

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

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

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

### **GOI files**

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

- in circumstances where a customer has come to the attention of Host Responsibility for monitoring;
- a third-party disclosure is made in relation to a customer's gambling; or
- a customer returns from exclusion having fulfilled the re-entry criteria.

Grand 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.

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

- monthly review for the duration of the investigation; and
- formal 6-month review.

Whenever new information becomes available or is obtained, a problem gambling reassessment must be undertaken. If an assessment is made that the customer is not a problem gambler after the 6-month review, 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. If concerns remain, the file will be left open and reviewed on a regular basis.

All deactivated GOI files will be retained by Grand Casino. A GOI file may be reactivated at any stage subsequent to the 6-month review period if further information or indicators in relation to a customer emerge. In this case, a problem gambling reassessment will be undertaken, and monitoring may continue.

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

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

Where new evidence emerges in relation to indicators of harm and identification of problem gamblers, such as through a literature review, Grand Casino will review its Problem Gambler Identification Policy accordingly. When an enhancement is identified by observations or development resources, we will act accordingly, even though the Programme or PGIP may not formally be changed.