

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

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
L M Hansen
R D Bell
D C Matahaere-Atariki
W N Harvey

Dates of Decision: 6 October 2017

Date of Notification
of Decision: 27th October 2017

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

Introduction

1. By this decision, the Gambling Commission (the "**Commission**") amends the Host Responsibility Programme ("**HRP**") that it approved for the Christchurch casino on 13 February 2015, and approves in its place the HRP **attached** to this decision.

Process

2. Condition 29 of CCL's operator's licence provides that the Commission must review the HRP for the Christchurch casino every two years. The Commission's last review of the Christchurch casino HRP concluded in May 2015, with decision GC12/15 issued on 13 May 2015 revoking the then existing HRP, and approving a new HRP in its place, effective 18 May 2015.
3. On 7 July 2017, following an inquiry by the Commission, CCL forwarded to the Commission a proposed updated draft HRP for its review.
4. Following receipt of CCL's proposed new HRP for the Christchurch casino, the Commission invited the Secretary for Internal Affairs (the "**Secretary**"), Ministry of Health ("**MoH**"), Problem Gambling Foundation, Salvation Army/Oasis ("**SA**") and Homecare Medical to make submissions. The Secretary, MoH, SA and Homecare Medical did so.
5. The Commission circulated a copy of the submissions received to each submitter and invited all to file submissions in reply. CCL and MoH filed submissions in reply.



6. The Commission first considered CCL's proposed HRP on the papers at its September 2017 meeting. The Commission identified a number of matters requiring clarification or further information and sought those from CCL. It resumed its consideration of the HRP, with the requested information, at its October 2017 meeting.

Jurisdiction

7. Condition 26 of the licence conditions attached to CCL's operator's licence for the Christchurch casino specifies the matters which must be included in the HRP. Condition 26 provides:

26. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
- (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
 - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
 - (c) the provision of loss and expenditure data to individual loyalty programme members;
 - (d) identification of problem gamblers and steps to be taken following identification. This shall include, as a minimum, the following:
 - (i) an acceptable definition of problem gambling;
 - (ii) indicators of problem gambling in the gambling venue;
 - (iii) the steps to be taken by the Licence Holder in identifying problem gamblers;
 - (iv) the steps to be taken by the Licence Holder following identification of problem gamblers;
 - (e) the provision of staff training;
 - (f) the provision of exclusion, self-exclusion and limitation programmes;
 - (g) assistance to casino employees with managing the potential for personal problem gambling;
 - (h) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
 - (i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;
 - (j) responsible practices in the conduct of promotions and inducements to gamble at the Casino;



- (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
- (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
- (m) standards of dress and behaviour at the casino;
- (n) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
- (o) liaison with problem gambling treatment providers, community service organisations and community representatives;
- (p) the provision of a safe gambling environment at the casino; and
- (q) such other matters as the Commission may require.

8. The HRP addresses the matters specified in condition 26, many of which, in turn, specify how CCL will implement obligations under the Gambling Act 2003 (“Act”) and Regulations.

9. In relation to conditions 26(d) and (f), sections 308-311 and 312A of the Act set out particular obligations relating to the identification of problem gamblers and exclusion procedures:

- (a) Section 308(1) requires the holder of a casino operator’s licence to develop a programme or policy for identifying problem gamblers. A notice advising customers of the existence of this policy must be displayed and a copy of the policy made available on request.
- (b) Section 308(4) requires the holder of a casino operator’s licence to “take all reasonable steps to ensure that the policy is used to identify actual or potential problem gamblers”.
- (c) Sections 309(1) and (2) of the Act require the holder of a casino operator’s licence to approach and provide information to every person identified under section 308(4) as a person whom the Licence Holder has reasonable grounds to believe is a problem gambler. Pursuant to section 309(2)(a), the information must include a description of the self-exclusion procedure made available under section 310.
- (d) Section 309(3) provides that an exclusion order may be issued to a problem gambler identified under section 308.
- (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 and advice but whose ongoing gambling or other behaviour gives

rise to reasonable grounds to believe is a problem gambler. The required assistance expressly includes issuing an exclusion order, without a request to do so, in appropriate cases.

- (f) Section 310 specifies when an exclusion order must be issued; namely, when requested by a person who has identified himself or herself as a problem gambler.
 - (g) Section 312A requires a casino operator to keep records of certain specified information about exclusions, including identifying details, the name, date and length of the exclusion and the conditions of re-entry and provide them if requested by the Secretary.
10. The HRP details how CCL will undertake both compulsory and discretionary activities aimed at harm minimisation, including how CCL will comply with the obligation to take all reasonable steps to assist a customer who, it has reasonable cause to suspect, is a problem gambler but who has not requested exclusion, and how it will implement the self-exclusion procedure required by section 310.
11. Section 4 of the Act defines “problem gambler” as:
- A person whose gambling causes harm or may cause harm.
12. “Harm” is defined in the Act as:
- (a) means 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, civil union partner, de facto partner, family, whanau, or wider community; or
 - (iii) in the workplace; or
 - (iv) by society at large.
13. A careful examination of these provisions and definitions reveals that the Act’s obligations are not confined to a single category of persons who have been formally diagnosed as problem gamblers. The definition of “problem gambler” includes an element of potentiality and the Act’s provisions cover a range which extends from potential problem gamblers (a person who is potentially someone whose gambling may cause harm) to self-identified problem gamblers.

14. In summary:

- (a) A problem gambler is someone whose gambling conduct has characteristics which “may cause harm”. While there is a sense in which the undertaking of any particular activity carries with it the potential for that activity to cause harm (in the sense that the possibility of harm being caused by an activity can only be completely excluded if the activity itself does not take place), it is clear that the definition is not to be interpreted in that very broad way. Such an approach would eliminate any of the distinctions which the language of the Act clearly recognises (as set out below). A problem gambler, as defined, (or an “actual” problem gambler) is not limited to someone whose gambling has actually caused harm but includes someone who is gambling in a manner which may cause harm. The definition thus focuses on gambling behaviour of a kind with the potential to cause harm (or which does cause harm) rather than solely on harm after the event.
- (b) The PGIP required by section 308(1) must be used to identify actual or potential problem gamblers (section 308(4)); that is, those who are or 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 (i.e., someone who is gambling in a manner which may cause harm) 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 and the casino operator must take reasonable steps to assist (including exclusion, if appropriate) those who do not request exclusion, if the operator has reasonable cause to believe that they are problem gamblers.
- (e) Those who identify themselves as problem gamblers and who request exclusion must be excluded by the casino operator for a period of up to 2 years.

15. The foregoing are the minimum steps that are required to be taken under the Act. The HRP must contain the detailed steps which will ensure that those minimum requirements are met but it is also intended to be a working operational document which records what the casino operator will in fact do, including in respect of discretionary matters. For that reason, the HRP contains steps which are additional to the statutory minimum and may even contain matters which are not, strictly speaking, concerned with problem gambling but which are conveniently located with harm minimisation activities.

CCL's submissions

16. CCL indicated that there were not many proposed changes to the existing HRP. It noted that it had incorporated provisions related to "cashless" gambling in more detail now that Ticket In-Ticket Out ("TITO") had been approved. It said that it had also increased its reporting obligations to the Commission. It indicated that it proposed no changes to its PGIP.

Submissions by the Secretary

17. The Secretary indicated that he was generally supportive of the amendments made and had not commented on every amendment individually. However he submitted that the HRP and PGIP were intended to place clear obligations on casinos. To this end, most of his submission focused on improving clarity of obligation. Other comments suggested areas where further improvement to the programme was possible.
18. His specific comments, in summary, were as follows:

HRP

- *Section 2.1.1 – Exclusion* – The third bullet point under subheading "Other measures" allows excluded customers to redeem loyalty points for rewards immediately. Loyalty points redeemed for rewards should be offered in cash only. Doing so would remove any need for customers to return to the casino or surrounding facilities to redeem rewards and would thereby reduce the risk of excluded gamblers attempting to gamble.
- *Section 2.1.3 – Unaccompanied children* – He commended CCL for considering scenarios where people leave their children with others to allow them to gamble. However the proposed changes did not provide sufficient clarity around the increased obligation. CCL should provide clear definitions of "unaccompanied children" and a "child whose caregiver is gambling". As to the latter, it was doubtful that all instances where a child was left with one caregiver while another parent or guardian gambles would be unacceptable (for example, a couple going out to dinner with a child and one parent spending some time gambling while the other parent finishes eating with the child). However, there would be other cases, such as teen siblings being left to manage younger siblings in a car or similar, which would be of concern. The provision did not distinguish between them.
- *Section 2.1.6 – Long hours of presence of play* – He supported the inclusion of the *Long Hours of Presence or Play* policy and acknowledged the work that CCL has put into identifying extended sessions of play. He also acknowledged CCL's

intention to apply harm minimisation processes to both carded (loyalty card holders) and 'un-carded' players. Identifying and managing continuous play continues to be an area of concern.

While a number of actions had been included in the proposed additions to CCL's HRP under this section, no actions in response to players being present at the casino for over 24 hours were proposed. Under the sub-heading "Continuous presence" (page 17), he proposed inclusion of an additional provision (similar to that in the Auckland HRP, page 16):

- When a customer has been continuously present at the casino (but not necessarily gaming continuously) for 24 hours and, provided that no action has already been taken under the Act, this Programme or the Policy:
 - a. non-international VIP customers must be requested to leave the casino for at least 24 hours; and
 - b. international VIP customers must be assessed by the International Business Management team to determine whether their play should be permitted to continue or not.
- *Section 2.1.7 – Gambling Limitation* – He commended the amendments made to this section, especially the inclusion of an automated system that alerts both gamblers and casino staff when agreed limits are approaching or reached but advocated the inclusion of more detail of the system. By way of example, the Auckland HRP (page 18) includes the following points on its pre-commitment system:

The features of the voluntary Pre-Commitment system include:

- access to the Pre-Commitment facility via SKYCITY's loyalty card;
 - each time the loyalty card is inserted, the Pre-Commitment facility will be activated;
 - the system will allow players to define their own limits for:
 - time limit; and
 - spend limit;
 - enrolment for pre-commitment can occur at either:
 - the gaming machine by the player; or
 - a loyalty member's workstation;
 - an "approaching limits" and "reached limits" notification will be displayed on the gaming machine;
 - if limits are relaxed, then the new limits must not be available to the player for a period of 24 hours;
 - once the limit is reached, no more SKYCITY loyalty points may be accumulated or entries to promotions earned;
 - SKYCITY Host Responsibility Executives must be alerted once limits are breached, increased or disabled;
 - no SKYCITY 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.
- *Section 2.1.8 – Cashless Gaming* – He supported the changes that focused on measures to minimise gambling harm as a result of cashless gaming. However,

the information relating to the “cash limits” is a mere duplicate of the standards (for TITO gambling in casinos) and the HRP does not provide any additional harm minimisation steps. He suggested that the bullet points relating to the “cash limits” be removed in order to maintain focus on measures to minimise the harm from cashless gambling.

- *Section 2.3 – Employee gambling-related harm* – Under the subheading *Recruitment*, CCL had made a number of proposed changes. One change included the replacement of the word “decline” with the word “assess” in relation to job applications by problem gamblers. As a result, applications for employment by problem gamblers would not necessarily be declined. He submitted that any person identified as a problem gambler should be declined employment at the casino and the wording should be changed accordingly.

PGIP – Section 2 – Indicators of problem gambling

- Under the subheading *Excessive Access to Money* (page 5), “repeat visits to cashiers” should be incorporated into “repeated ATM visits and/or multiple declined transactions”. Such a change would encompass both financial difficulties and potential loss of control over gambling.
- CCL’s use of the phrase “tray-surfing” is intended to capture a wide range of customer behaviours. It should be better defined to provide a more comprehensive explanation of the types of behaviours covered.

Submissions by MoH

19. MoH indicated that it had sought input from the Health Promotion Agency (“HPA”) in preparing its submission because the HPA works with other parts of the gambling industry on venue harm minimisation policy and had useful insight in the area. It advised that, in general, it considered that many of the amendments to CCL’s HRP were sensible and reasonable for monitoring purposes.
20. Its specific comments, in summary, were as follows:

HRP

- It would be beneficial to provide details of the Gambling Helpline and the Choice not Chance website in sections which suggest where to get help.
- In both the HRP and PGIP, the words “problem gambler” should be replaced with “customer experiencing gambling harm”, as this terminology is currently used in other parts of the gambling sector.



- *Section 2.1.3 – Unaccompanied children* – To the sentence “Employees must report to Security any incident where it is apparent that a child has been left unaccompanied” it recommended adding “or supervised while a main care giver is gambling”.
- *Section 2.1.6 – Long hours of presence or play/Continuous play – Continuous Play is where a customer is gaming continuously for five hours or more. The clock is reset after a customer has had a break from gaming of at least 30 minutes (in aggregate)* – The National Gambling Study (2014) Report No. 2 shows that the risk of being a problem gambler or a moderate risk gambler is 28 times higher for people who gamble for three or more hours on casino EGMs than for people who do not gamble on casino EGMs.

The results of the DIA’s Mystery Shopper exercise indicated that CCL should put greater focus on responding to long hours of play (up to 12 hours), logging player behaviour and following up with gamblers in a timely fashion, or immediately, once identified.

- *Section 2.1.7 – Gambling limitation* – CCL has deleted the entire section headed “Agreed Limitation” from its HRP and has not replaced it with anything. It suggested including information on self and/or multi-venue exclusion.
- *Section 2.5 – Environmental Design - Requirements* – It suggested a provision setting out precisely how signage concerning responsible/problem gambling and indicating exits would be made clearly visible.
- *Section 2.8 – Display of signage and provision of gambling information to customers – Approach* – This section refers to Appendix A for the range of resources available. Wallet leaflets should continue to be made available, as these have been shown to be effective and discrete.

PGIP

- *Section 2 – Indicators of problem gambling – Strong and General Indicators – Intensity and Frequency of Play* – CCL should align their strong and general signs of harmful gambling with those in the Gambling Host Initiative material. For example, emotional distress including agitation, mood swings, crying, holding head in hands are listed in the PGIP as general signs. The Gambling Host Initiative refers to these behaviours as strong signs.

- (p5) – The PGIP should require action to be taken once a specific number of general signs had been observed. It was suggested that action by CCL should be required if three or more general signs were observed.
- (p5) – *Extreme changes in patterns of play* – The proposed wording gave the false impression that behavioural changes of concern would be sudden and all at once. “Extreme” should be removed and it should note that “Change in the pattern of play could be slow and occur over a period of time”.
- (p5) – *Visible Emotional Disturbance* – It suggested changing “out-of-character behaviour” to “changes in behaviour, including changes in behaviour over time”.
- (p13) – When recording information on “... gamblers of interest ...”, the wording should be changed to “... customers displaying general or strong signs of gambling harm”.
- (p13) – As a GOI file could remain open after a 12 week period, it suggested that there should be a provision about how often it should be reviewed.
- (p12) – There should either be an “Actions to be taken” section to the PGIP, or a reference to the HRP (operational policy/practices) under “Consequences of Identification”.

Submissions by Homecare Medical

21. Homecare Medical submitted that it had no issue with any of the proposed changes. It considered that several changes made the obligations clearer.

Submissions by SA

22. SA advised that, overall, it considered that the HRP was a well thought out document and agreed with many of the points set out in it. Its specific comments, in summary, were as follows:

- *Section 2.1.6 – Long hours of presence or play* – It is concerned about the length of time taken to approach customers. For continuous play, customers are allowed five hours of play before intervention. Five hours is a very long time and would be enough time for significant harm to occur. It holds the same opinion about the hours of presence without intervention being 12 hours. Professor Paul Delfabbro suggests that gambling for three hours or more without a break is an indication of potential problem gambling and this time period is now included in the HPA’s and DIA’s best practice host responsibility guidelines for Class 4 venue staff to identify

potential problem gamblers. Furthermore, when considering that gambling is a sedentary activity, the physical health consequences of sitting gambling, for up to 12 hours should be of concern. Long periods of play time should be reduced and staff should begin intervening after 3 hours of continuous play.

- *Casino gambling harm resources* – CCL provides an excellent variety of 'Responsible Gambling' handouts, with appropriate amounts of information for customers. However, in the HRP, there is mention of a resource "Taking the Mystery Out of the Machine". This does not appear to be available via CCL's website.
- *Employee training* – It is pleased that all CCL's staff are now trained in basic host responsibility. This means that there is a wider availability of staff able to observe and intervene with potential problem gamblers if appropriate and this is a positive step. It commends CCL for this decision.

Submissions in reply by MoH

23. MoH generally supported the original submissions by the Secretary and SA.

Submissions in reply by CCL

24. CCL made further submissions in response to the submissions received. It indicated that it had accepted a number of the suggestions made by other parties. Accordingly, it had amended the draft proposed HRP and PGIP and submitted a new version to the Commission with its reply submissions.
25. It identified, in its reply submissions, the points raised by other parties with which it did not agree. It submitted that, in general, the rejected suggestions consisted of proposed amendments that were immaterial, or of matters that had been well canvassed and rejected in previous reviews.

Further matters raised by the Commission

26. In addition to considering the submissions, the Commission compared the revised CCL proposed draft HRP and PGIP to the HRP and PGIP which it had approved in decision GC11/17, issued on 28 July 2017, in respect of the Auckland casino. In that decision, which followed the receipt of the original drafts by CCL, the Commission had made considered changes to the wording of the draft Auckland casino HRP after receiving detailed submissions. A number of the provisions in the CCL draft were identical to provisions in the original Auckland draft which, after hearing submissions, the Commission had altered.



27. While the Commission considers that provisions in individual HRPs will inevitably differ from one another for reasons related to differences in the circumstances and operations of different casinos, in this case, the provisions had been drafted originally with the apparent intent that they be the same. As a result, the Commission identified as a potential issue whether to follow, or approve departures from, the recently approved changes to the wording of the same provisions in Auckland.
28. After reviewing the submissions and amended draft HRP and PGIP, the Commission sought further information from CCL. It asked for copies of the Standard Operating Procedures (“SOPs”) referred to in the draft HRP and PGIP (noting that, in some areas, the HRP lacked substantive content and instead referred to an SOP). The Commission identified the instances in which proposed draft wording, which had been common to the recently proposed Auckland casino HRP, had been amended in decision GC11/17, sought submissions on whether similar changes should be made to the draft Christchurch casino HRP, and queried whether the draft HRP reflected actual or minimum practice.
29. CCL provided the SOPs referred to, advised that it did not oppose similar amendments to those made in decision GC11/17, and proposed further amendments to the draft HRP and PGIF in the light of the matters raised by the Commission.
30. If all operational detail of a subject covered in the HRP is recorded in a SOP, it will be critical that the SOP be included and approved, as part of the HRP (as the PGIP is). As a result of reviewing the Christchurch casino SOPs, the Commission considered that, even if a draft HRP did not move any substantive obligations to SOPs, it would be beneficial to see any SOPs referred to in a HRP at the time of its review. In the Commission’s view, relevant SOPs should always be provided with a draft HRP, in order to enable the Commission to check the proposed HRP wording.

Analysis

The Issues

31. To identify the matters in issue, the Commission analysed the submissions received and exchanged, including the reply submissions. The exchange clarified the issues between the parties, namely those which had been raised in the submissions of other parties but which CCL had rejected (as the matters accepted were no longer in issue).
32. By that means, the Commission identified the following matters of contention in the HRP:
- (a) Whether the term “problem gambler” should be replaced with “customer experiencing gambling harm”.



- (b) Whether HRP section 2.1.3 (Unaccompanied Children) should define “unaccompanied children” more strictly or have words added to the action provision.
 - (c) Whether more detailed action requirements, including insertion of strict provisions regarding actions to be taken after presence in the casino for 24 hours, or continuous play for more than 10 hours, similar to those in Auckland, should be included in HRP section 2.1.6 (Long Hours of Presence or Play).
 - (d) Whether more detail of the voluntary pre-commitment system and the current Agreed Limitation provisions (proposed for deletion) should be included in HRP section 2.17 (Gambling Limitation).
 - (e) Whether the provisions in HRP section 2.1.8 (Cashless Gambling) should record the cash limits set out in the approved standards for TITO gambling.
 - (f) Whether the provision in the Recruitment paragraph of HRP section 2.3 (Employee gambling-related harm) should impose a strict obligation to decline applications from those believed to be problem gamblers or allow flexibility depending on the circumstances.
 - (g) Whether HRP section 2.5 (Environmental Design) should include details of how signage is to be made clearly visible.
33. In relation to the PGIP, the Commission identified the following matters in issue between the parties:
- (a) Whether there should be a requirement to take action after a specified number of general signs are observed.
 - (b) Whether “Gambler of Interest” should be changed to “customers displaying general or strong signs of gambling harm”.
 - (c) Whether an additional “actions to be taken” section is required.
34. The Commission identified the following issues as arising from its comparison to the recently approved Auckland HRP and PGIP:
- (a) In both the original and revised versions of the draft PGIP, the examples used to illustrate a strong (Severe Emotional Distress) and a General (Visible Emotional Disturbance) Indicator differs from the amended descriptions approved in decision



GC11/17. In particular, the illustrative behaviour “holding head in hands”, which had been deleted in that decision, was retained.

- (b) The wording used in the last bullet point under the General Indicator *Dysfunction in Social Behaviour* is that used in the original Auckland draft, rather than the amended wording finally approved.
- (c) The Commission made changes to the draft Auckland HRP to require, for a period of 6 months, the monitoring, using a GOI file, of all customers returning from exclusion. No similar provision appeared in the proposed Christchurch HRP.

Replacing “Problem Gambler” and “Gambler of Interest” with alternative terms

- 35. It is convenient to deal with submissions by MoH that the term “problem gambler” be replaced generally throughout the HRP with “customer experiencing gambling harm”, and the term “Gambler of Interest” (and its abbreviation, GOI) be replaced in the PGIP with “customer displaying general or strong signs of gambling harm”. MoH advanced the suggestions on the basis that such alternative terminology was in use in other parts of the gambling industry.
- 36. CCL opposed both suggested changes, on the basis that “problem gambler” was a well-established term that was used (and defined) in the legislation and that Gambler of Interest or GOI was simpler, more familiar and more encompassing than the suggested replacement.
- 37. The Commission agrees with CCL. The sections of the legislation relevant to HRPs use the defined term, “problem gambler”, and one of the purposes of HRPs is to address the express statutory obligations relating to the defined term. In the Commission’s view, it would be highly undesirable to use a different term in place of a statutory term when the intent was to meet a statutory obligation.
- 38. It would be even less desirable to substitute a term which did not aptly describe the meaning of the statutory term. In the Commission’s view, the proposed terms are not synonyms for the terms which they are proposed to replace. The Commission has set out in some detail, in paragraphs 11 to 14 above, the meaning and application of the statutory term. The suggested alternative term would materially misdescribe the nature of the term “problem gambler” under the Gambling Act 2003, undesirably narrowing its applicable scope.
- 39. Similarly, the term “Gambler of Interest” or GOI has been in use since prior to the first Commission-approved HRP for the Auckland casino. It refers to identified customers who are required to be monitored and assessed by the casino. The requirements for

identification and monitoring are set out in each HRP and PGIP. The Commission sees no benefit in changing such a well-established term for one which does not describe those to whom it applies with complete accuracy.

40. The Commission declines to replace either term in the draft HRP or PGIP. In addition, having regard to the suggested replacement terms, the Commission considers that Section One of the PGIP would benefit from expansion so that it includes, not only the statutory definitions of “problem gambler” and “harm”, but an explanatory section on the application of those terms to the statutory obligations summarised in the introductory section of the PGIP. The Commission has included such an explanatory analysis in its recent HRP decisions. It inserted an additional explanatory section, based on paragraphs 13 and 14 above.

Unaccompanied and supervised children (HRP 2.1.3)

41. CCL proposed adding to the current prohibition on children being left unaccompanied on or around its premises, a prohibition on children being left supervised in order to allow a caregiver to gamble. In its reply, CCL resisted a call to define both categories better in order to make the obligation clearer. It pointed out that children are not permitted on the casino premises in any event and said that it preferred to leave the categories undefined in order to allow it more flexibility in operation.
42. The Commission appreciated the thinking behind the proposed amendment. It represented an advance on other HRPs of potential value in appropriate circumstances. However, in the Commission’s view, it is important that obligations in a HRP are sufficiently clear in their terms to be practically enforceable.
43. Despite the worthy thought behind the suggested amendment, the Commission considered that, as proposed, the obligation was insufficiently clear in its terms, unless it were to be applied literally across a variety of circumstances. In that event, it would capture situations which went well beyond the proper underlying concern, as the Secretary had pointed out. The Commission also doubted that it would be practical for casino employees to identify circumstances in which it would be appropriate to take action. In addition, the provision appeared to address a risk which, on the evidence before it, had not been identified as a problem at casinos. In general, it expected casinos to be focused on customers present on site, rather than roaming surrounding areas making inquiries about the whereabouts of the main caregivers of any children observed.
44. The Commission decided accordingly to leave Section 2.1.3 unaltered from that currently approved.



Long Hours of Presence or Play (HRP 2.1.6)

45. The Commission considered minimum standards for intervention after time spent gambling or present at the casino as recently as July 2017 in decision GC11/17. Several submissions suggested that the maximum period without intervention should be reduced from what had been approved in that decision but no new information to justify reconsideration was put forward.
46. Submitters did note that, unlike other HRPs, which specify the forms of action to be undertaken once the maximum period of continuous presence is reached, the proposed CCL provision did not require any action to be taken. CCL resisted calls for the HRP to stipulate some form of action because it says that it acts in practice earlier than the HRP indicates and because specifying any form of minimum action would reduce flexibility.
47. The Commission noted that the Continuous Presence provision was expressed, not as a minimum standard of response, but as a “general rule”. CCL’s reply submissions indicate that the provision does not reflect its usual practice because, in practice, it intervenes earlier than the HRP indicates “as a general rule”. Although section 2.1.6 says that, as a general rule, staff and host responsibility are alerted after 12 hours of continuous presence and 5 hours of continuous gambling, CCL says that, in practice, notification and intervention start as early as 2.5 hours and its automated alert system is set accordingly.
48. While ideally, a HRP would record both usual and minimum practice, if a HRP does not reflect usual practice, which may include provision for some latitude for reasonable operational flexibility, it should at least express a minimum standard of conduct. In the Commission’s view, the continuous presence provision should, at a minimum, specify at least one form of action which must be taken after a lengthy period of continuous presence.
49. In this latter regard, the Commission does not consider it acceptable to specify no minimum action for continuous presence, even after as long as 24 hours, or for continuous gambling, even after as long as 10 hours.
50. The Commission amended section 2.1.6 of the draft HRP accordingly. It imposed similar minimum requirements to those at other casinos and amended the “general rule” introduction to make it clear that it constituted a minimum response after the stipulated periods of continuous presence or continuous play respectively.

Gambling Limitation (HRP 2.1.7)

51. CCL proposed to retain the current sub-section headed “Pre-Commitment” but to delete entirely the sub-section headed “Agreed Limitation”. While the draft HRP had a

somewhat expanded description of the former provision (compared to the current provision), as some submitters noted, it was far less detailed than other HRPs. In response, CCL said that the detail was contained in a SOP which provides the actual guidelines to staff.

52. In its further amended draft HRP, CCL inserted a sufficiently detailed summary of the features of its automated Pre-Commitment system to constitute a set of minimum obligations. As a result, the Commission did consider that it was necessary to incorporate the Pre-Commitment SOP into the HRP.
53. The Commission noted, however, that CCL had deleted from section 2.1.7 the entire sub-section headed "Agreed Limitation". The MoH challenged the appropriateness of the deletion. In its reply submission, CCL simply described the deleted sub-section as "redundant". However, the deleted sub-section described a more extensive agreed limitation scheme than the automated pre-commitment facility described in the preceding sub-section; the latter is limited to carded play on gaming machines and consists of an automated warning at 80% of the set limit and no bonus points or promotion entries after 100%. In contrast, the deleted sub-section recorded a scheme which offers restrictions on the number of visits within a period, the number of hours spent on site during a day, the money spent on site in a day, or a combination thereof.
54. CCL offered no explanation for its claim that Agreed Limitation is now redundant. The current provision offers customers much more assistance with control over their gambling than Pre-Commitment. As a general rule, the Commission strongly supports casinos making self-management tools available to customers.
55. The Commission declined to remove the current Agreed Limitation sub-section from the HRP.

Cashless gambling (HRP 2.1.8)

56. CCL proposed a new section on cashless gambling because regulatory provisions for TITO gambling had been issued since the last HRP. The new section summarised the new requirements.
57. The Secretary criticised the new section for being a mere summary of the regulatory requirements but did not suggest any specific improvements. The implication was that the HRP should not summarise regulatory obligations which appear elsewhere. CCL replied that, as it was a new area, it was helpful to staff to repeat the requirements in the HRP.



58. The Commission agrees with CCL. It considers that it is appropriate to summarise related legal obligations in the over-arching harm minimisation policy document. By way of example, the beginning of the PGIP summarises the statutory requirements which underpin the development and use of the PGIP and the statutory definition of “problem gambler” is set out in Section One of the PGIP. In the Commission’s view, summaries of key obligations are highly beneficial and are preferable to a mere reference to something in another document.
59. The Commission accordingly made no amendment to section 2.1.8.

Employee gambling-related harm (HRP 2.3)

60. CCL proposed an amendment to the current Recruitment subsection of section 2.3, namely the replacement of the obligation to **decline** applications from those considered to be problem gamblers, with an obligation merely to **assess** their applications. The change was opposed by the Secretary who submitted that there were no circumstances in which a problem gambler should ever be offered employment at the casino.
61. In reply, CCL argued that, rather than prejudging all applicants, sufficient flexibility should be provided to allow CCL to take account of the nature of the position and the applicant’s current circumstances. Rather than automatically declining an application from someone who had previously experienced gambling problems, CCL submitted that it should be permitted to assess the risk in each individual case.
62. The Commission considers that the proposed amendment by CCL is acceptable. “Problem gambler” is not a permanent status such that everyone who has ever experienced problems with gambling should thereafter be treated as a problem gambler. Not only are there a variety of positions within a casino operation but, like other casinos, CCL prohibits its employees from gambling at the Christchurch or Dunedin casinos (so employment by CCL reduces one’s opportunities to gamble).
63. The Commission accordingly made no change to section 2.3.

Environmental design (HRP 2.5)

64. The MoH suggested that the draft section be expanded to include a description of how signage would be made clearly visible. MoH did not, however, suggest any specific amendment to the section. CCL submitted that such an addition was unnecessary because the casino was small, open and its signage was prominently displayed.
65. The Commission agrees that the suggested expansion is unnecessary but not primarily for the reasons suggested by CCL.



66. The draft HRP requires CCL to ensure that “problem/responsible gambling signage and exit points are clearly visible”. The HRP thus requires a specific, beneficial state of affairs or outcome. The Commission is not clear what additional methodological description MoH wished to see added (as it did not set that out) but, in this instance, it can see no reason for it to specify a methodology rather than an outcome. A more specific obligation might be justified if there were current visibility problems which were thought to arise from inadequately expressed obligations but MoH did not submit that visibility was currently a problem. In that sense, CCL’s submission concerning the current state of its signage was relevant.
67. The Commission noted that section 2.5 is not materially different from the equivalent section of other HRPs and declined to amend the draft section.

Suggested HRP amendments

68. The Commission has already addressed the suggested change in GOI terminology. The remaining contentious changes were suggested by MoH and related to whether the PGIP should stipulate specific action after a fixed number of general problem gambling indicators had been observed and whether, more generally, an additional “actions to be taken” section was required. CCL opposed the suggested changes, on the basis that each case should be assessed on its own merits, not according to fixed criteria, and the additional section was not required because one already existed on page 12 of the PGIP.
69. Both suggestions relate to Section Two (Indicators of Problem Gambling) and Section Four (Identification) of the PGIP. Indicators are divided into Strong and General categories. General Indicators occur in many gamblers but more frequently in problem gamblers. They are warning signs which are often equivocal but which can become more indicative as their number and severity increases, including over time.
70. Because identification of problem gamblers necessarily requires a good faith assessment of a number of Indicators, many of which are equivocal, the Commission does not consider it appropriate to endeavour to fix an objective standard based on the occurrence, irrespective of severity, of a fixed number of General Indicators. In some cases, intervention might well be required sooner and, in others, such a rule might result in false positives and excessive system “noise”.
71. As CCL submitted in reply, the last subsection of Section 4, headed “Consequences of Identification”, already specifies the steps which CCL is required to take once it has good cause to believe that a customer is a problem gambler. Those steps are common to other PGIPs. The Commission sees no reason to change that aspect of the draft PGIP.



Inconsistencies with recently approved PGIP

72. The Commission noted that CCL had proposed identical wording to the draft Auckland PGIP, which the Commission had subsequently amended in decision GC11/17. In its response to the Commission, with one notable exception, CCL did not generally oppose changes to reflect the amendments made in decision GC11/17.
73. In the case of Severe Emotional Distress (a Strong Indicator) and Visible Emotional Disturbance (a General Indicator), the originally proposed wording had subsequently been altered by CCL as a result of adopting submissions by MoH. That change had resulted in the behaviours “crying, holding head in hands” being moved from the General Indicator to the Strong Indicator. In decision GC11/17, the Commission deleted the words “holding head in hands” as a behaviour indicating emotional distress. It did so after considering submissions concerning false positives because the behaviour was frequently exhibited without any emotional distress. The Commission can see no reason why its reasoning would not apply equally to Christchurch casino. Accordingly it deleted the words “holding head in hands”, but otherwise accepted the amended wording proposed by CCL.
74. While considering General Indicators, the Commission also noted that CCL’s draft PGIP did not list breaches of credit arrangements as a General Indicator. In decision GC03/17, the Commission approved a new set of circumstances for the authorised provision of credit for gambling by casino operators (commonly called the casino credit policy); the conditions include opening a GOI file when a customer fails to repay credit as arranged, or if the credit is extended, or remains unpaid after 30 days. The Commission expects to see consequent provision made in each casino’s HRP and PGIP, including listing failure to meet conditions of credit arrangements as a General Indicator in Section Two (Indicators of problem gambling) and making adequate reference in Section Five (Record keeping) to the requirement to open a GOI when required by the terms of the credit authorisation.
75. The Commission also noted that section 2.6.2 Safe gambling environment – cheque retention reflected the former 2010 casino credit policy and had not been updated to reflect the requirements of decision GC03/17. Authorised credit is no longer limited to cheque retention and the monitoring requirements have changed. The Commission accordingly amended section 2.6.2 of the HRP to reflect the requirements imposed by decision GC03/17.
76. The Commission decided to add to the list of General Indicators in Section Two, under the subheading *Excessive Access to Money*, the following bullet point:



Seeking an extension of credit arrangements or failing to repay credit when agreed or within 30 days (whichever is the shorter).

The Commission also decided to add the following bullet point to the first set of bullet points under the heading GOI Files in Section Five:

When required by the terms of any approved circumstances for providing credit.

77. In decision GC11/17, the Commission also made changes, to both Section Two and Section Five of the PGIP, which focused on monitoring customers returning from exclusion. Those changes extended the wording of a General Indicator behaviour and added a requirement for longer term monitoring of customers returning from exclusion.
78. CCL accepted the former but resisted the period imposed for the latter. It submitted that opening GOI files for previously excluded customers for 6 months after their return to the casino would "significantly increase" the number of customers requiring monitoring (but without reference to either the current number of GOI files nor the estimated increase in their number). It proposed a monitoring period of only 8 weeks instead. It assumed, incorrectly, that the monitoring requirements for formerly excluded customers imposed in Auckland had been in exchange for removal of a requirement for compulsory counselling; in fact, the Commission had seen the two requirements as largely unrelated. In any event, CCL neither currently has, nor proposes in the draft HRP, compulsory counselling for excluded customers.
79. The Commission was surprised at the suggestion that monitoring customers returning from exclusion for an extra 4 months would significantly increase the required level of monitoring activity but, assuming that it did, the Commission did not regard that as inappropriate on the limited information provided. On balance, it did not consider that CCL had made a case for reduced monitoring requirements compared to those recently imposed at the Auckland casino.
80. The Commission accepted the proposed further amendment, by insertion of an additional bullet point under the General Indicator *Dysfunction in Social Behaviour* in Section Two to read:
- Previous exclusion (by self or casino) or breach of any harm minimisation requirement.
81. The Commission did not accept the proposed amendment to the GOI files sub-section of Section Five. Because, as a result of earlier submissions, CCL had amended the "review period" from 12 weeks to monthly, it made a consequential amendment to the minimum period for which a GOI file must remain open (reducing it from 12 weeks to the "review period", which had been reduced to 1 month).



82. The Commission did not consider that GOI files should be closed as early as 1 month after being opened. It also considered that formerly excluded customers should be monitored for a period of 6 months following their return to the casino. Accordingly, it amended the proposed provision to read as follows:

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

83. The Commission otherwise accepted the draft HRP proposed by CCL.

Conclusion

84. The Commission specifies the HRP **attached** to this decision, including the PGIP annexed to and forming part of the HRP. These documents shall take effect from **10 November 2017**, replacing CCL's HRP approved by the Commission in decision GC12/15.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

27th October 2017





CHRISTCHURCH

CASINO

HOST RESPONSIBILITY PROGRAMME
CHRISTCHURCH CASINOS LIMITED

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Appendix A – Current Host Responsibility Resources for Customers

Appendix B – Identification Policy

1.0 Introduction

Approval

Effective date: 13 November 2017

Manager:



Brett Anderson
Chief Executive

1.1 Statement of position

Statement of position

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

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

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

Compliance with legal obligations

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

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

1.2 Programme objectives

Objectives

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

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

Christchurch Casino aims to fulfil these objectives by:

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

Outcomes

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

2.0 Harm minimisation and prevention components

Introduction

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

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

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

Roles and responsibilities

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

The role is co-ordinated by the Host Responsibility Executive and is supported by senior managers including:

- Chief Executive Officer;
- Security and Surveillance Manager;
- Risk and Compliance Manager;
- Food and Beverage Manager;
- Gaming Manager; and
- VIP Manager.

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

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

2.1 Policies and procedures

Policies and procedures

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

Policies:

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

Standard operating procedures:

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

- Exclusion;
- Unaccompanied children;
- Underage Persons;
- Responsible Service of Alcohol;
- Undesirable Behaviour;
- Pre-commitment and Agreed Limitation; and
- Long periods of play.

The following SOPs relate to the Problem Gambler Identification Policy:

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

2.1.1 Exclusion

Introduction

Christchurch Casino offers two types of exclusions:

- self-exclusion; and
- Christchurch Casino identified exclusion (casino exclusion).

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

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

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

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

Approaches to customers

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

Features of the exclusion process

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

Communication

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

Third parties and service providers

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

¹ Section 309A

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

Other measures

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

Breaches

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

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

Loyalty card holders

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

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

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

The Surveillance Operator or Customer Services must:

- deactivate excluded cardholders' accounts;
- deactivate the accounts of cardholders who have been trespassed or formally requested to leave the premises; and

- deactivate from mailing lists, cardholders who are excluded, trespassed or formally requested to leave the premises.

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

2.1.2 Responsible service of alcohol

Background

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

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

Our objectives, as a responsible host, are:

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

Approach

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

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

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

2.1.3 Unaccompanied children

Background

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

Approach

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

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

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

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

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

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

2.1.4 Underage persons

Background

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

Approach

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

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

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

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

2.1.5 Standards of dress and behaviour

Background

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

Dress code

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

Behavioural standards

If a customer is detected:

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

then Christchurch Casino employees must:

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

Customers exhibiting undesirable behaviour may be trespassed or excluded.

2.1.6 Long Hours of Presence or Play

Continuous Presence

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

As a minimum:

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

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

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

Continuous Play

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

As a minimum:

- When a customer has been observed to be continuously gaming for five hours without a break of at least 30 minutes (in aggregate), the observing staff member will notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- At the very least, in the course of the interaction, the customer should be encouraged to take breaks and Gaming Staff and/or Host Responsibility must thereafter continue to monitor the customer (which may include subsequent interactions with that customer).
- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.
- When a customer has been gaming continuously with a loyalty card for 10 hours (without an aggregate break of at least 60 minutes) and, provided that no action has already been taken under the Act, this Programme or the Policy:
 - local customers must be requested to leave the casino for at least 24 hours; and
 - international VIP customers must be assessed by Host Responsibility to determine whether their play should be permitted to continue or not.

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

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

Uncarded

Although ascertaining the length of "continuous presence" and players "continuous play" for uncarded players relies upon observation rather than a system record, if staff become aware of uncarded players being "continuously present" or undertaking "continuous play" for the periods set out above, they must report their observation so that those uncarded players are treated as set out above.

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

2.1.7 Gambling Limitation

Pre-Commitment

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

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

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

The features of the voluntary Pre-Commitment system include:

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

Agreed Limitation

Customers who are eligible for participation in Agreed Limitation are offered several "Limited Participation" options to assist in minimising the potential for gambling harm. They are as follows:

- restrictions placed on the number of visits over a specified period of time;
- restrictions on the hours spent on site on any gaming day;
- restrictions on monies spent on site on any gaming day;
- a combination of the above.

An offer of Agreed Limitation is not a substitute for, or an alternative to the provision of information on the availability of self-exclusion. Agreed Limitation will only be made available in circumstances where a customer can gamble without experiencing harm.

Customers identified for participation in the Agreed Limitation programme are provided with information regarding exclusion options prior to signing an Agreed Limitation Agreement. Should a customer on the Agreed Limitation programme request self-exclusion, this request must be facilitated immediately and will take precedence over any Agreed Limitation Agreement.

Agreed Limitation is not intended to be a replacement for professional counselling. Contact details for problem gambling counselling services are available to customers at all times and any customer wishing to access these services is supported to do so.

Details for administering Agreed Limitation are shown in the Agreed Limitation SOP.

2.1.8 Cashless Gambling

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

General Limits:

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

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

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

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

Limits in Restricted Areas:

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

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

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

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

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

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

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

2.2 Host responsibility information for customers

Customer information resources

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

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

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

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

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

2.3 Employee gambling-related harm

Introduction

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

Background

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

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

Requirements

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

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

Information resources

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

Policies and procedures

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

Recruitment

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

Support for employees

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

Engagement

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

2.4 Stakeholder engagement

Background

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

Approach

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

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

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

Christchurch Casino will invite representatives from:

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

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

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

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

2.5 Environmental design

Approach

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

Considerations

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

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

This approach applies to the following Christchurch Casino areas:

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

Requirements

Christchurch Casino shall in its environmental design seek to ensure:

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

Other regulatory processes

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

2.6 Safe gambling environment

Approach

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

Considerations

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

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

Should these events occur a Person of Interest (POI) file will be created and an investigation completed.

Requirements

Christchurch Casino will:

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

2.6.1 Safe gambling environment – third party loans for financial gain

Legislation

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

Policy

Christchurch Casino does not permit loan transactions by third parties for financial gain at the casino, except as approved by the 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

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

2.6.2 Safe gambling environment – credit provision

Policy

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

Requirements

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

Host Responsibility will record and monitor for indicators of potential gambling harm the activities of any customer whose credit terms (by time or amount) are extended beyond the initial arrangements, or who fails to repay the credit extended within the period initially agreed or within 30 days (whichever is the shorter).

2.7 Responsible marketing

Legislation and industry codes

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

Requirements

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

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

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

Does the marketing initiative:

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

2.8 Display of signage and provision of gaming information to customers

Background

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

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

Approach

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

Display of signs, brochures, clocks and website

Christchurch Casino ensures that:

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

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

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

Christchurch Casino has a host responsibility section on its website.

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

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

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

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

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

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

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

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

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

Information requests by customers

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

Information on gambling activity

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

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

2.9 Learning and development

Introduction

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

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

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

Overview of employee roles

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

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

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

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

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

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

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

Learning and development requirements

Induction training (Level 1)

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

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

Christchurch Casino will work to supplement this classroom-based training by ensuring that these employees also complete a written test. A failure to pass will result in the person undergoing further training and re-sitting the test. Follow up recall testing will be undertaken within 6-8 weeks of passing the test. There will also be refresher training as noted below.

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

Induction training will generally be classroom based.

Training for Supervisors (Level 2)

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

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

Advanced training (Level 3)

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

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

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

Refresher training

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

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

General Manager training – Sale and Supply of Alcohol Act

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

Suicide awareness training

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

Informal learning and development

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

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

Evaluation

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

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

2.10 Identification of problem gamblers

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

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

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

This policy must be made available upon request. Christchurch Casino must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

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

The information or advice offered must include a description of:

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

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.

3.0 Monitoring and reporting

Introduction

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

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

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

Reports to the Gambling Commission

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

Reports will include the following information:

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

Gambling Related Measures	Source of data	Frequency
<ul style="list-style-type: none"> Number of customers about whom there have been observations. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of indicators reported to Host Responsibility. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of approaches to Christchurch Casino by third parties. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of problem gamblers identified by the casino. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers in Host Responsibility log. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of GOI files by: <ul style="list-style-type: none"> ethnicity gender age preferred mode of gambling (tables/EGMs). 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of interventions conducted with customers. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of exclusions by: <ul style="list-style-type: none"> ethnicity gender age preferred mode of gambling prompted by third party disclosures exclusion type (self/Christchurch Casino) timeframe following re-entry. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi venue exclusions. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi casino exclusions. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in Pre-Commitment. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of excluded customers agreeing to be contacted by help services on exclusion form. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of breaches of exclusion by: <ul style="list-style-type: none"> ethnicity gender age. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of successful and unsuccessful applications to re-enter following exclusion. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of persons trespassed or required to leave for making loans for financial gain. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers enrolled to use SET. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers with GOI file opened after enrolling to use SET. 	Christchurch Casino	Annual
<ul style="list-style-type: none"> Number of customers Casino-Excluded or Self-Excluded after enrolling to use SET. 	Christchurch Casino	Annual

Measures relating to responsible consumption of alcohol		
• Number of "Under the Influence" (UTI) incidents (internal report).	Christchurch Casino	Annual
• Number of requests for people to leave due to the amount of alcohol consumed.	Christchurch Casino	Annual
• Number of Police contacts citing Christchurch Casino as venue where their last drink was served.	Police Alcolink database	Annual
Measures relating to employee training		
<ul style="list-style-type: none"> • Level 1 courses • Level 2 courses • Level 3 courses • Refresher training • Number of employees who need to be trained in each category, and proportion of those employees that have completed the appropriate level training. 	Christchurch Casino	Annual
• Employee recall of knowledge and behaviours related to host responsibility and associated policies and procedures.	Christchurch Casino	Annual
• Employees' perceptions on the effectiveness of the Employee Gambling Harm Programme.	Christchurch Casino	Annual
• Results of tests conducted by employees relating to host responsibility and associated policies and procedures.	Course Evaluations	Annual
• Employees' perceptions of the effectiveness of training.	Course Evaluations	Annual
Other Programme activity and compliance-related measures		
• Number of internal and external underage incidents.	Christchurch Casino	Annual
• Number of unaccompanied children.	Christchurch Casino	Annual
• Number of unaccompanied children where the care giver is gambling.	Christchurch Casino	Annual
• Number of supervised children.	Christchurch Casino	Annual
• Number of supervised children in our surrounds where the care giver is gambling.	Christchurch Casino	Annual
• Number of people trespassed or requested to leave the casino for other reasons.	Christchurch Casino	Annual

Appendix A – Current Host Responsibility Resources

(as at June 2017)

Brochures

“PlaySafe DrinkSafe”

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

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

“Your guide to understanding gaming machines”

Aimed to help customers make informed decisions about their gambling, it also provides an understanding about odds of winning or losing.

“PlaySafe DrinkSafe - not just for our customers”

Now a part of Christchurch Casino’s employee manual, this advisory offers tips on how to have a great night out safely; employees can take the ‘eight screen’ and assess themselves; and it provides a number of options if they need to speak with someone.

“Unaccompanied Children – not even for a minute”

The brochure outlines NZ law and the measures Christchurch Casino will undertake if a child is found unsupervised in any area around the environs of the casino.

“Your guide to setting Playing Limits on gaming machines”

Wallet card sized brochure providing the reader with a guide to setting expenditure and/or time limits using the Pre-commitment facility on gaming machines.

Signage

Customer Care – Code of Conduct

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

DrinkSafe

Aimed at encouraging customers to consume alcohol responsibly while at Christchurch Casino.

PlaySafe

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

Concerned about your own or someone else’s gambling?

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

Responsible service of alcohol policy:

Displayed in all bars for customer to read, it is often used as a reference tool for employees serving alcohol.

Conditions of entry:

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

PlaySafe DrinkSafe 'not just for our customers':

Displayed back of house; encouraging employees to consider the impacts of their gambling and drinking.

Appendix B



CHRISTCHURCH

CASINO

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

Problem Gambler Identification Policy

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

Objective

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

Statutory Requirements

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

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

The information or advice offered must include a description of:

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

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

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

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

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

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

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

Scope of Christchurch Casino Problem Gambler Identification Policy

This Policy describes:

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

Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

- Exclusion and Re-Entry;
- Unaccompanied children and
- Pre-Commitment.

Section One – Definition of a problem gambler

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

“Harm” is defined as:

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

The Act’s obligations are not confined to a single category of persons who have been formally diagnosed as problem gamblers. The definition of “problem gambler” includes an element of potentiality and the Act’s provisions cover a range which extends from potential problem gamblers (a person who is potentially someone whose gambling may cause harm) to self-identified problem gamblers.

As a general guide:

- (a) A problem gambler is someone whose gambling conduct has characteristics which “may cause harm”. While the possibility of harm being caused by an activity can only be completely excluded if the activity itself does not take place, the term is not applied like that. A problem gambler (or an “actual” problem gambler) is not limited to someone whose gambling has actually caused harm but includes someone who is gambling in a manner which may cause harm. The definition focuses on gambling behaviour of a kind with the potential to cause harm (or which does cause harm) rather than solely on harm after the event.
- (b) The PGIP required by section 308(1) must be used to identify actual or potential problem gamblers (section 308(4)); that is, those who are or may be gambling in a manner which may cause harm.
- (c) Of those identified as actual or potential problem gamblers, those whom the casino operator has reasonable cause to believe to be a problem gambler (someone who is gambling in a manner which may cause harm) must be approached and given information.
- (d) The casino operator must take reasonable steps to assist (including exclusion, if appropriate) those who do not request exclusion, if the operator has reasonable cause to believe that they are problem gamblers.
- (e) Those who identify themselves as problem gamblers and who request exclusion must be excluded by the casino operator for a period of up to 2 years.

Section Two - Indicators of problem gambling

Introduction

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

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

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

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

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

INDICATORS

Strong Indicators

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

General indicators

Intensity and Frequency of Play

- 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+ lost per session) over a period of time (for example, 1 month);
- High visitation frequency combined with very high levels of expenditure on all forms of gambling, including table games, over a period of time;
- Very few breaks from gambling – almost continuous play;

- Increasing periods of play, and betting more each time, noted over a period of time (noting that gambling expenditure may reduce as the customer's financial resources are exhausted);
- Disconnect with time spent playing, including missing key times (e.g. meals), rushing when leaving machine or staying after friends/family leave;
- Changes in patterns of play; or
- Breaching pre-commitment limits and/or multiple increases or disabling of pre-commitment limits.

Visible Emotional Disturbance

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

Dysfunction in Social Behaviour

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

Excessive Access to Money

- Leaving the casino to get additional money and coming back after having appeared to have run out of money;
- Seeking an extension of credit arrangements or failing to repay when agreed or within 30 days (whichever is the shorter).
- Repeated ATM or Cash Desk visits and/or multiple declined transactions;
- Borrowing money, including begging;
- Not having sufficient money to exit car park;
- Constantly seeking complimentaries; or
- Looking for residual credit on gaming machines, or coins left in the collect tray.

Expenditure and Frequency of Play

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

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

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

Other Observations

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

Section Three – Sources of Indicator Data

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

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

All information on customers collated from the sources described below is recorded as soon as practicable into Christchurch Casino's security and surveillance database.

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

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

CUSTOMER DISCLOSURES

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

Direct disclosures

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

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

Indirect disclosures

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

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

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

Direct and indirect disclosures from customers must be recorded into the security and surveillance database and made available to Host Responsibility, as soon as practicable, to be used in making problem gambling assessments.

BEHAVIOURAL OBSERVATIONS

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

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

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

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

CUSTOMER DATA INCLUDING LOYALTY

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

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

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

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

All relevant information will be recorded into the security and surveillance database 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, employees will ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this will be recorded into the security and surveillance database 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 will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Christchurch Casino will also provide to the customer problem gambling information, including Exclusion options. The action must be logged into the security and surveillance database and made available to Host Responsibility as soon as practicable, a GOI file is opened, and an investigation is undertaken.

A third party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and will be treated on an urgent basis. The third party must be referred immediately to a Shift Manager 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 the customer is 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, Christchurch Casino must also provide to the customer problem gambling information, including Exclusion options. The action must be logged into the security and surveillance database and made available to Host Responsibility as soon as practicable, a GOI file opened, and an investigation is undertaken.

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

INTERVIEWS WITH CUSTOMERS OR EMPLOYEES

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

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

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

Section Four - Identification

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

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

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

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

Obligation to Identify

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

Analysis of Information

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

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

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

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

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

Identification

Strong indicators

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

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

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

General indicators

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

Consequences of Identification

Once identified as a problem gambler, Christchurch Casino must:

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

¹ Section 309

² Section 310

³ Section 309A

Section Five – Record keeping

Recording, collation and analysis of information

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

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

As outlined in Section 3, all information collated by Christchurch Casino in relation to a customer is recorded as soon as practicable into the security and surveillance database.

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

GOI files

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

- in circumstances where a customer has come to the attention of Host Responsibility for monitoring;
- a third party disclosure is made in relation to a customer's gambling;
- when required by the terms of any approved circumstances for providing credit; or
- a customer returns from Exclusion having fulfilled the Re-Entry criteria.

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

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

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

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

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

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

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

Section Six – Review

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

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