

IN THE MATTER of the Gambling Act 2003

AND the amendment by the Responsible Gaming Program for the
LASSETERS WHARF CASINO

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
P J Stanley
L M Hansen
R D Bell
A K Foote

Date of Decision: 14 September 2012

Date of Notification of Decision: 28 September 2012

DECISION
ON THE AMENDMENT BY THE GAMBLING COMMISSION OF THE RESPONSIBLE GAMING PROGRAM FOR THE LASSETERS WHARF CASINO

Introduction

1. By this decision, the Gambling Commission ("**Commission**") amends the Responsible Gaming Program ("**RGP**") for the Lasseters Wharf casino, approved by the Casino Control Authority and dated 14 May 2004, and approves in its place the Host Responsibility Programme ("**HRP**") **attached** to this decision.

Process

2. Condition 28 of the licence conditions attached to Otago Casinos Limited's ("**OCL**") operator's licence provides that the Commission will review OCL's HRP every two years. The first revision was scheduled for 1 December 2008, or such later date as the Commission may approve. OCL submitted a draft HRP for Commission consideration in March 2009, as approved by the Commission.
3. The Commission is required to consult with interested parties, as appropriate, and amend the HRP as it determines, after giving the Licence Holder the opportunity to comment. Potentially interested parties comprising the Secretary for Internal Affairs ("**Secretary**"), Ministry of Health ("**MoH**"), Problem Gambling Foundation ("**PGF**"), Gambling Helpline ("**GH**"), Salvation Army ("**SA**"), SKYCITY Casino Management Limited and Wakatipu Casino Liaison Committee ("**WCLC**") were invited to make written submissions on the draft HRP. Submissions were received from the Secretary, PGF and GH.

4. The Secretary, PGF, GH and OCL were invited to file submissions in reply, which the Secretary and PGF did.
5. Subsequent to this, OCL submitted an amended HRP together with a document explaining the amendments. The Commission offered the Secretary and PGF the opportunity to file submissions on OCL's amended HRP. Both of them did so.
6. The Commission considered OCL's amended draft at its August 2009 meeting. The Commission identified a number of areas requiring further consideration, and liaised with OCL on those matters. However before the HRP was finalised, the Commission paused its review in order to consider the effectiveness of the HRP that was approved for the Auckland casino in December 2007.
7. The Commission recommenced its review of OCL's Programme in May 2012 by inviting OCL to submit an amended HRP for Commission consideration. The Commission received that document in June 2012.
8. Potentially interested parties comprising the Secretary, MoH, PGF, Lifeline, SA and WCLC were invited to make submissions on the 2012 draft. Submissions were received from the Secretary and MoH.
9. The Commission invited OCL, the Secretary and MoH to file submissions in reply, which the Secretary and OCL did.
10. The Commission considered OCL's amended draft HRP at its September 2012 meeting. The Commission identified a small number of matters requiring further consideration and communicated those to OCL, before approving the HRP.

Background

11. As noted in decision GC14/12, the Gambling Commission commenced and advanced its review of the non-Auckland HRPs, following its approval of the Auckland Programme in December 2007. The review process for each HRP, including OCL's, was quite advanced, with the Commission receiving drafts (which were based on the Auckland Programme) and submissions on those drafts from interested parties. During this time, the Commission received regular updates on the effectiveness of the Auckland Programme in the form of written and oral six-monthly reports from SKYCITY Casino Management Limited ("**SCML**"). As the Commission considered these reports, it became apparent that the Auckland Programme was offering valuable on-the-ground experience and learnings that should be applied to the other five casinos. As a result, the work on the other Programmes was paused so that the Auckland data and feedback could be taken into consideration. This pause was done with the knowledge that each casino had

an existing Programme which imposed binding obligations on the operators sufficient to hold them to account if required.

12. By 2011, the Commission felt that the Auckland experience was well understood and recommenced its consideration of the non-Auckland HRPs, commencing with the SKYCITY Hamilton and Queenstown Programmes. The Commission approved new Programmes for the SKYCITY Hamilton and Queenstown casinos in May 2012, with a number of variations derived from the Auckland feedback.
13. In its decision approving the Programmes for the SKYCITY Hamilton and Queenstown casinos, the Commission stated that it would contact the Dunedin, Christchurch and Lasseters Wharf casinos and ask them to submit updated draft HRPs for Commission consideration. The Commission also stated that it would expect the drafts to closely follow the Hamilton and Queenstown HRPs, with any variances being included only to improve the documents or to recognise any differences in the size and scale between the respective casinos.
14. In May 2012, the Commission wrote to OCL inviting it to submit a new draft HRP for the Commission's consideration. OCL did so, submitting its draft in June 2012.

Jurisdiction

15. Condition 25 of the licence conditions attached to OCL's operator's licence specifies the matters which must be included in the HRP for the Lasseters Wharf casino. Condition 25 provides:
 25. 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.
16. The HRP address the matters specified in condition 25, many of which, in turn, specify how OCL will implement obligations under the Gambling Act 2003 (“**Act**”) and Regulations.
17. In relation to conditions 25(d) and (f), sections 308-311 of the Act set out particular obligations relating to the identification of problem gamblers and exclusion procedures. 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.
18. Section 308(4) provides as follows:
- The persons required by subsection (1) to develop a policy for identifying problem gamblers must take all reasonable steps to use that policy to identify actual or potential problem gamblers.

19. 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. Section 309(3) provides that an exclusion order may be issued to a problem gambler identified under section 308, while section 310 specifies when an exclusion order must be issued.
20. The HRP specifies how OCL will exercise its discretion to exclude a problem gambler who has not requested exclusion.

Submissions to the Commission

21. As noted above, the Commission received submissions in 2009 on OCL's drafts. Those submissions were of value to the Commission's consideration of those drafts, but were overtaken once OCL filed an amended Programme in 2012. This decision therefore focuses on the 2012 draft and the submissions made on it.
22. As the HRP proposed for the Lasseters Wharf casino closely follows that approved for the SKYCITY Queenstown casino, the submissions, and the Commission's own analysis, identified only a small number of matters that required consideration. The matters identified were generally in the nature of typographical errors or inadvertent inclusions/omissions and, when they were brought to OCL's attention, OCL readily accepted them as errors and stated that it would re-draft its documents to remedy them.
23. The only specific matter identified by the Secretary which OCL did not expressly accept was in relation to section 2.1.1 – Exclusion – where, under the "Loyalty Cardholder" subsection, the Secretary noted that OCL's Programme did not include a bullet point (which was in the SKYCITY Queenstown Programme), which required OCL to:
 - Make comment in the Customer's account advising of the date and timeframe of the exclusion.
24. The Secretary was of the view that OCL should include this bullet point as it contributes to the effective administration and enforcement of exclusion orders, and would produce a clear audit trail. In reply, OCL stated that its loyalty card facility does not allow such information to be added because it has old technology. OCL noted, however, that it electronically records this information elsewhere.
25. The Commission noted that OCL already records the information so reinserted an amended bullet point to take account of OCL's technology, as follows:
 - Appropriately record the Customer's name together with the date, type and length of the exclusion.

26. MoH submitted that the words “for financial gain” should be deleted from section 2.6.1 – “Safe gambling environment – Third party loans for financial gain”, as a loan transaction for financial gain cannot be proved.
27. The Commission was of the view that OCL’s drafting, which mirrored the drafting of the Auckland, Hamilton and SKYCITY Queenstown HRPs, was appropriate. The Commission was also of the view that it was important to retain the words “for financial gain” as financial gain is integral to the concept of loan-sharking.
28. The Commission noted that the HRP did not include a number of measures in section 3 which OCL should report on to the Commission. This omission was likely inadvertent as OCL based its measures on those set out in SKYCITY Queenstown’s HRP without the knowledge that a number of measures pertinent to the SKYCITY Queenstown casino are reported to the Commission by SCML at a group level through its Auckland Programme. The Commission therefore amended OCL’s list to include the additional measures.

Additional submissions by the Secretary and submissions by MoH

29. Following his submissions on the 2012 draft, the Secretary contacted the Commission to state that he also wanted to provide some general observations on the HRPs that have already been approved. He stated that his observations may add value to the Commission’s review of OCL’s HRP, but noted that it is within the Commission’s discretion as to how it utilises these comments.
30. The Secretary thought that several matters could be clarified, as follows:
 - That the monitoring of loyalty data is an obligation in and of itself, rather than a matter which is considered only once a customer is brought to the attention of a casino’s host responsibility team.
 - That the examples provided under the section “General Indicators – Intensity and Frequency of Play” in the PGIP are just that – examples. Further, in relation to this, that casino operators should examine loyalty data at different thresholds of loss and frequency of play for different customer types.
 - What period of gambling constitutes “continuous” play.
31. In relation to loyalty data, the Commission made its position plain when it approved the Programme for the Auckland casino in 2007 – that operators must consider loyalty data as part of its process to help with the identification of problem gamblers. That is, loyalty data is an obligation in and of itself, rather than information that is only used for

corroboration purposes, as the Secretary put it. This was made clear at paragraph 54(e) of decision GC24/07, where the Commission stated that:

54. Key changes from SKYCITY's original drafting ... including the following:
 ...
 (e) clarification that loyalty data should be used proactively to screen for people who need to be monitored (based on expenditure and visitation frequency), as well as for verifying identification of the problem gambler;

32. In relation to the general indicators, the Commission again wants to make it clear that the "Intensity and Frequency of Play" examples are just that – examples. They are to assist operators in the areas of frequency and expenditure, but are not to be applied strictly or literally. That is, a loyalty member may not necessarily be a problem gambler simply because s/he loses \$300 per session on gaming machines having visited the casino five times per week, over a one month period. However, if that member was sustaining this level of loss on gaming machines, having attended the casino almost daily, over the period of one month, the Commission would expect the operator to know about it and to have investigated and actively considered whether he or she should be treated as a problem gambler – "a person whose gambling causes harm or may cause harm".
33. As the intensity and frequency of play examples are indicative only, the Commission saw no need to stipulate that operators must examine loyalty data at different thresholds for different customer types and to fix what they should be. The obligation is to use the data proactively to screen for persons who should be monitored. Depending on what is known about individual customers, operators are expected to adopt appropriate thresholds on a common sense basis.
34. The Secretary sought clarification of the term "continuous play" with a suggestion that a timeframe be attached, presumably on the basis that a patron who gambles for longer than that period is deemed to be playing continuously. The Commission understands the reason for the Secretary's suggestion as it would provide clarity, but it doubts that the question "for how long should gambling take place before it is regarded as continuous for the purposes of the HRP?" has a sufficiently obvious and self-evident answer to justify its inclusion in this HRP.
35. It is not a question that the Commission presently considers that it is in a good position to answer. The Secretary did not suggest an appropriate timeframe in his submissions and even if he had done so, the Commission would have wanted to consult and receive advice and information before concluding whether the Secretary's view was correct.
36. The Commission intends to consider this matter in more detail when it reviews the new Auckland HRP. This will allow the Commission to be assisted by a range of views and

advice, including from Associate-Professor Paul Delfabbro from the University of Adelaide, whom the Commission will likely engage to assist with this review.

37. The Commission expects that the Secretary, and other interested parties, will consider this matter further and make submissions on it, including whether there should be a definitional timeframe for continuous play and, if so, what it should be, in the context of the Auckland review.
38. The Secretary raised a number of additional matters, which mirrored some of MoH's submissions. They submitted that OCL's HRP includes some requirements that are open to interpretation and may not, therefore, be legally enforceable. For example, section 2.1.1 – Exclusion – requires OCL to take “timely” action if a customer requests self-exclusion. They submitted that the current drafting lacks precision, which is also true for phrases such as “as soon as practicable”, “every endeavour”, “appropriate action” and “proactive monitoring”.
39. The Secretary also noted that minimum timing requirements could be added in some areas, and that there should be a specific requirement for some matters to be documented – for example, a “risk and harm assessment”. MoH submitted that OCL has an undue amount of discretion available when exercising its host responsibility obligations.
40. The Commission noted these submissions but took the view that decisions about the extent to which timeframes should be stipulated and requirements expressly tightened should await the wide-ranging assessment and feedback which it expects will occur with the review of the Auckland HRP. Like the “continuous play” definition issue, it thinks that these issues should await that review rather than occur within the OCL HRP review.
41. The obligations are not ineffective simply because precise timeframes are not expressed. Any failure by OCL (or indeed any casino operator) to take steps which results in a breach of the HRP, even if the obligations are generally expressed, can result in suspension or cancellation of licence. This possibility is a strong motivator for operators to act in accordance with the spirit of the HRP. The Commission has previously suspended a casino operator for a period of time when it fell short of its host responsibility obligations which were generally expressed.
42. If submitters remain of the view that aspects of the HRP obligations require additional precision, they should raise these submissions again in the context of the forthcoming Auckland review where full submissions and expert assistance will be available.

Conclusion

43. 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 October 2012**, replacing OCL's RGP dated 14 May 2004. OCL is required to report next to the Commission in accordance with condition 28 and section 3 of the Programme, on **1 December 2013**.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

28 September 2012





Host Responsibility Programme

Table of Contents

1.0	Introduction	1
1.1	Statement and Vision	2
1.2	Programme Objectives	3
2.0	Harm minimisation & prevention components	4
2.1	Policies and procedures	5
2.1.1	Exclusion	6
2.1.2	Responsible Service of Alcohol.....	8
2.1.3	Unattended Children	10
2.1.4	Underage Persons.....	11
2.1.5	Standard of Dress and Behaviour	12
2.1.6	Gambling Limitation	13
2.2	Host Responsibility information for customers	14
2.3	Employee gambling-related harm	15
2.4	Stakeholder engagement	17
2.5	Environmental design	18
2.6	Safe gambling environment - Gaming machine play	19
2.6.1	Safe gambling – Third party loans for financial gain	19
2.7	Responsible Marketing	21
2.8	Display of signage and provision of gaming information to customers	22
2.9	Learning and Development	24
2.10	Identification of problem gamblers	27
3.0	Monitoring and Reporting	28
	Appendix A - Current Host Responsibility Resources for Customers	32
	Appendix B – Problem Gambling Identification Policy	

1.0 Introduction

Approval

Effective Date: 10 October 2012

Manager:
Chris Sartori
Chief Operating Officer

.....
Oliver O'Neill
General Manager

1.1 Statement and Vision

Management Policy Statement

Lasseters Wharf Casino is committed to providing a fun and safe environment for all customers and staff.

Lasseters Wharf Casino believes in promoting responsible alcohol and gambling service, and recognises that alcohol and gambling can be associated with harm for some customers. Lasseters Wharf Casino takes its role in being a responsible host very seriously, and actively participates in local, regional and national programmes; that recognises the need to prevent and minimise alcohol and gambling-related harm and to promote education for its employees and customers.

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

Compliance with Legal Obligations

Lasseters Wharf Casino has developed this Programme, which addresses the host responsibility conditions in the Casino Operator's licence held by Otago Casinos Limited that relate to the Lasseters Wharf Casino.

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

1.2 Programme Objectives

Objectives

The principal objectives of Lasseters Wharf Casino Host Responsibility Programme include:

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

Lasseters Wharf Casino aims to fulfil these objectives by:

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

Outcomes

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

2.0 Harm minimisation & prevention components

Introduction

Lasseters Wharf 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
- Learning and development
- Identification of problem gamblers
- Gambling limitation

The Programme requirements are outlined below.

Roles and Responsibilities

Due to the relatively small scale of Lasseters Wharf Casino's operation, the casino does not have a dedicated Host Responsibility team. The Host Responsibility function is managed by the Security & Surveillance Manager. Reporting to this role are two Security & Surveillance Shift Managers. All three roles are responsible for the ongoing monitoring and management of Gambler of Interest (GOI) files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff. Recording, collating and analysing all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers is managed by the Security & Surveillance Shift Manager, as designated by the General Manager.

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

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 Lasseters Wharf 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.

Polices

- Problem Gambler Identification Policy

Standard Operating Procedures:

The following SOPs relate to harm prevention and minimisation activities:

- Exclusions
- Unattended Children
- Underage Persons
- Responsible Service of Alcohol
- Undesirable Behaviour
- Agreed limitation

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation
 - Analysis and Intervention
-

2.1.1 Exclusion

Introduction

Lasseters Wharf Casino offers two types of exclusions:

- Self-Exclusion; and
- Lasseters Wharf Casino Exclusion.

Lasseters Wharf Casino provides the facility for Self-Exclusion of customers from the gaming area for a period of at least one year 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 where there are multi-venue exclusion arrangements in place.

Lasseters Wharf Casino Exclusion is for a period of two years and the customer must also meet re-entry conditions. Lasseters Wharf Casino Exclusion is undertaken where a problem gambler does not take up Self-Exclusion, and Lasseters Wharf Casino determines 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. Lasseters Wharf Casino imposes exclusion when it has been determined that the customer is a problem gambler (in line with the definition in the Act) and unable to continue gambling without further harm. This determination is generally made on the basis of assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of self-exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. Lasseters Wharf Casino may also impose exclusion after serious one-off incidents where an offer of self-exclusion has been refused.

Approaches to customers

Only appropriately trained staff may undertake exclusions with customers. This is generally Security & Surveillance Shift Managers.

Features of the Exclusion Process

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

Communication

- Provides a translation service where necessary and when available.
- Provides support to excluded customers through provision of materials from problem gambling counselling service providers, and contact details.
- For Self-Exclusion, provide Questions and Answers in appropriate languages (if available).

Third parties and service providers

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

- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the Excluded customer and during any discussion relating to re-exclusion or re-entry.
- Encourages the Excluded customer to nominate a counselling service.
- Arranges for the counselling service to call the Excluded customer, if the Excluded customer agrees.

Other measures

- Provides an updated database that is accessible to Security and Gaming staff to ensure detection of customers breaching an Exclusion order.
- Promotes ongoing dialogue with counselling service providers to continually improve the Exclusion process.
- Provides the customer with an opportunity to immediately redeem all loyalty points for rewards and suspends sending all loyalty information to the customers.
- Requires timely action from staff 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 opportunities 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

Lasseters Wharf Casino staff are required to be vigilant for any excluded customer who attempts to re-enter gaming areas. Lasseters Wharf Casino Security and Gaming staff enforce the Exclusion process and take action against those detected committing a breach of the Exclusion process. Customers discovered attempting to do so may face a fine and/or prosecution. The Department of Internal Affairs is notified of all breaches by Excluded customers.

Loyalty Card Holders

Lasseters Wharf Casino must remove from the loyalty programme all Excluded and Trespassed customers.

Lasseters Wharf Casino Security and Surveillance staff member responsible for the administration of the exclusion and trespass records must:

- record the customer's name together with the date, type and length of the exclusion.
- take the customer to the Cash Desk prior to conducting their exclusion to redeem any loyalty points;
- immediately go in to the Lasseters Club Card account and deactivate the card number;
- deactivate from the mailing lists, cardholders who are Excluded and Trespassed.

Loyalty cards which are deactivated are not required to be returned by the customer to Lasseters Wharf Casino. Should a customer attempt to use his/her deactivated card, an error message will appear, asking the customer to present his/her card to a staff member. Having confirmed that the customer has been Excluded or Trespassed, the staff member will contact Security and appropriate action will be taken in relation to that customer.

2.1.2 Responsible service of alcohol

Background

The Lasseters Wharf Casino Responsible Service of Alcohol Programme is designed to ensure customers enjoy an environment that is safe and enjoyable. A key component is the Lasseters Wharf Casino Responsible Service of Alcohol training which is designed for all staff who work in areas where alcohol is served, to promote effective team work to ensure customers safety and enjoyment.

Lasseters Wharf Casino Responsible Service of Alcohol Programme is guided by the six principles of Host Responsibility (Alcohol Advisory Council of New Zealand, 2005) in licensed premises. A responsible host:

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

Approach

The following is the Lasseters Wharf Casino programme regarding the responsible service of alcohol:

- Lasseters Wharf Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Lasseters Wharf Casino Maintains an effective Responsible Service of Alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol.
- All Lasseters Wharf Casino employees complete the Responsible Service of Alcohol training programme during induction as part of the Host Responsibility training programme, including recognition of excessive alcohol consumption traits.
- Lasseters Wharf Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Lasseters Wharf Casino takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
- Any customer who appears under the age of 25 is asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, the customer is not to be served or supplied with any alcohol.
- Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption.
- No person who appears intoxicated is served or sold alcohol, allowed to gamble or 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 liquor is sold or supplied to members of the public, there is a manager (or managers) on duty who holds a current General Managers Certificate under the Sales of Liquor Act 1989.

- When appropriate, Lasseters Wharf 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 the Gaming Shift 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.
-

2.1.3 Unattended children

Background

Lasseters Wharf Casino management does not allow children to be left unattended on any part of its premises.

Lasseters Wharf Casino takes active steps to prevent children being left unattended on its premises and/or surrounding premises without adult supervision.

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

Security Officers must intervene and take all practicable steps to locate an adult responsible for an unattended child.

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

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

2.1.4 Underage persons

Background

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

Approach

Lasseters Wharf 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.)

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 Lasseters Wharf Casino Security and Gaming staff must include the need to be particularly vigilant for the presence of underage persons.

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

2.1.5 Standard of dress and behaviour

Background

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

Dress Code

Lasseters Wharf Casino requires a neat and tidy standard of dress. While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at Lasseters Wharf Casino:

- torn clothes;
- gang patches or other insignia;
- dirty, soiled clothes or footwear.

Behavioural Standards

If a customer is detected:

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

then Lasseters Wharf Casino staff must:

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

Customers exhibiting undesirable behaviour maybe trespassed or excluded.

2.1.6 Gambling limitation

Approach

The VIP Agreed Limitation Programme is a harm minimisation initiative for VIP customers. It is available on request to all VIP customers. Lasseters Wharf Casino may also offer it to VIP customers who are identified as being at risk of harm in the circumstances described below.

The key criteria for offering Agreed Limitation are that the customer and the casino agree that it will support the at-risk customer to gamble without experiencing harm. Participation is closely monitored and reassessed. Where infringements occur, the casino takes appropriate action. This may include approaches to the customer and Exclusion in circumstances where the customer is unable to continue gambling without experiencing harm.

Limitation Programme

Customers who are eligible for participation in the Agreed Limitation programme are offered a 'Time Out' programme to assist in minimising the potential for gambling harm.

'Time Out' requires the customer to take a break from all play at Lasseters Wharf Casino for three, six or nine months.

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.

2.2 Host Responsibility information for customers

Customer Information Resources

Lasseters Wharf Casino produces a range of host responsibility information resources for customers. Copies of all Lasseters Wharf Casino brochures and other host responsibility information resources are available and displayed where appropriate in the casino.

This information is also supplemented by the Lasseters Wharf Casino website (www.wharf-casino.co.nz) where electronic copies of the resources are made available. A copy of the Host Responsibility Programme is displayed on the Lasseters Wharf 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 Lasseters Wharf Casino customer base.

2.3 Employee gambling-related harm

Introduction

Lasseters Wharf Casino is committed to developing an internal culture that supports and promotes host responsibility.

Background

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

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

These measures are intended to address the operator licence condition:

“26(g) assistance to casino employees with managing the potential for personal problem gambling.”

Requirements

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

Lasseters Wharf 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 staff that will be made available when required through appropriate channels. They will include:
 - a standardised gambling screen; and
 - self-help resources to assist with early self-identification and intervention; and
 - information on how to access local problem gambling services.
- Include information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in Host Responsibility training programmes and in the Employee Assistance Programme.
- Promote awareness about self-assessment and self-help resources and encourage staff to use these resources themselves to assist with early identification and intervention.

Policies and procedures

- Prohibit access to online gambling sites by staff while on Lasseters Wharf Casino premises.
- Identify high risk areas for staff and target with increased levels of information.
- Prohibit staff from gambling at Lasseters Wharf Casino.

Recruitment

- Assess all job applicants for evidence of problem gambling (via questions on job application forms).
- Decline applications from those who are identified as problem gamblers either through their application, or disclosure of relevant indicators (as set out in the Lasseters Wharf Casino Identification Policy) during the recruitment process and provide appropriate information, advice and assistance.
- Respond to applicants identified as a problem gambler who are also customers in accordance with the Lasseters Wharf Casino Host Responsibility Programme.

Support for staff

- Provide assistance to staff who are experiencing gambling–related harm including:
 - identification;
 - intervention;
 - referral to confidential support through the Employee Assistance Programme and/or problem gambling treatment provider;
 - confidentiality; and
 - wherever possible Lasseters Wharf Casino will involve problem gambling counsellors in casino staff training.
-

2.4 Stakeholder engagement

Background

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

Approach

Lasseters Wharf Casino will continue to facilitate opportunities for engagement to ensure local stakeholders:

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

A key stakeholder initiative is Lasseters Wharf Casino's participation in and support of the multi-site exclusion process. Other participants include SkyCity Queenstown Casino and local Class 4 venues.

Lasseters Wharf Casino will convene quarterly problem gambling liaison meetings to discuss host responsibility issues. It will invite local stakeholders such as the DIA, the Police, the Salvation Army Oasis Centre and the Wakatipu Casino Liaison Group.

2.5 Environmental design

Approach

Lasseters Wharf 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:

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

This approach applies to the following Lasseters Wharf Casino areas:

- floor layout, furnishing and design;
- casino electronic gaming machine and table game location;
- access to cash;
- game and equipment features;
- physical location and presence of Security and Host Responsibility;
- location of information resources; and
- access criteria, including dress codes and age restrictions.

Requirement

Lasseters Wharf Casino shall in its environmental design seek to ensure:

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

Other regulatory processes

All applications for construction or design changes to gambling areas must be approved by the Gambling Commission. As part of any such application Lasseters Wharf Casino assesses any impacts the alterations may have on harm prevention and harm minimisation prior to making applications to the Commission. 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 Gambling Commission.

2.6 Safe gambling environmental – Gaming machine play

Requirements

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

2.6.1 Safe gambling environment – Third party loans for financial gain

Legislation

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

Policy

Lasseters Wharf Casino does not permit loan transactions by third parties for financial gain at the casino venue, 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 and to ensure no loan sharks can operate within or in the close vicinity of the casino.

Requirements

- Lasseters Wharf Casino will ensure that information is available in appropriate areas publicising that loan sharks will be excluded.
- Lasseters Wharf Casino will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process Lasseters Wharf Casino will develop an Undesirable Behaviour SOP which shall explain how Lasseters Wharf Casino will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, Lasseters Wharf Casino will investigate and act in a timely manner. This process is outlined in the Undesirable Behaviour SOP.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, Lasseters Wharf 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, Lasseters Wharf Casino may request confirmation of identity of the customer, and the customer be requested 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, Lasseters Wharf casino will issue that person with a trespass notice.

- Lasseters Wharf Casino will notify Department of Internal Affairs Gambling Inspectors in accordance with MOS for records and Notification. Where appropriate, Lasseters Wharf 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), Lasseters Wharf Casino will open up 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 Lasseters Wharf Casino-Exclusion, depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
 - Lasseters Wharf Casino will provide appropriate training to assist in preventing and minimising harm associated with loan sharking.
-

2.7 Responsible Marketing

Legislation, Industry Codes

Lasseters Wharf Casino marketing activities comply with applicable laws; Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004; relevant industry codes including New Zealand Advertising Standards Authority “Code for Advertising Gaming and Gambling”); and licence conditions.

Lasseters Wharf Casino always undertakes a conservative and precautionary approach to the marketing of gambling and gambling products.

Requirements

Lasseters Wharf Casino will not specifically target local residents when advertising gaming products.

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

Lasseters Wharf Casino will ensure an internal consultation process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of Lasseters Wharf Casino’s loyalty programme. 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 Lasseters Wharf Casino.

A description of how Lasseters Wharf Casino will discharge its obligations to offer information and advice to a person identified as a problem gambler is addressed in the Problem Gambler Identification Policy and the SOPs.

Approach

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

Display of signs, brochures, clocks, website

Lasseters Wharf Casino ensures that:

- Host Responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of Lasseters Wharf Casino visitors.
- Brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations.
- All gaming machines and gaming tables at Lasseters Wharf Casino display problem gambling helpline telephone numbers, with information in a range of languages.
- Clocks are on display in all Lasseters Wharf Casino gambling areas.
- After hours callers to Lasseters Wharf Casino can be diverted to the Gambling Helpline.

Lasseters Wharf Casino will make available a “Responsible Gaming” brochure, developed as part of Lasseters Wharf Casino Host Responsibility Programme, and intended to assist in reducing the tendency of patrons to be subject to incorrect beliefs, e.g. that the odds of winning are better than they are, that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

Lasseters Wharf 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 Lasseters Wharf Casino about another’s gambling problems, are actively encouraged to contact the appropriate service for help and support.

Lasseters Wharf Casino has established a Host Responsibility section on its website.

Display of game rules, permissible bets, payment of winning bets for Table Games

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

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies the minimum and maximum bets, and payments of winning bets. Signage is also displayed stating that staff cannot accept tips.

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

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the Lasseters Wharf Casino "Responsible Gaming" leaflet, which is available on the gaming floor.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, a trained gaming employee will explain the game rules to the customer.

Information Request by Customers

Customers wishing to seek further clarification of the game rules will be shown where 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, where possible, the number and length of their gambling sessions and their gambling expenditure.

Lasseters Wharf Casino will also work to develop systems to enable it to provide information to customers who are not loyalty card players, at their request, on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

2.9 Learning and Development

Introduction

Lasseters Wharf Casino is committed to developing staff awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. Lasseters Wharf 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.

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

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

Overview of Staff Roles

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

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

Supervisors or Managers: 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 including how to contact problem gambling service providers 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 staff, and follow up responses taken by staff and/or supervisors and managers, 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: The Security and Surveillance Managers record, collate, and analyse all information relating to indicators of problem gambling noted by frontline staff, and supervisors and managers. They also record interactions and interventions they undertake themselves. The information is used to undertake an assessment of risk and harm. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken. This may include 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 staff.

Learning, Developments and Requirements

All permanent staff, whether or not in direct contact with customers, must participate in two hours of face-to-face training within a reasonable timeframe of commencement (approximately two 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; and
- awareness of employee gambling-related harm.

For all staff in direct contact with customers, Lasseters Wharf Casino will work to supplement this classroom-based training by ensuring that these staff also complete a self-guided workbook with practical components, to be completed within two months of initial classroom-based training. Follow up recall testing will be undertaken within 6-8 weeks of completing the workbook. There will also be refresher training as noted below.

Training for staff in direct contact with customers will be further supplemented by on-the-job coaching and support.

Induction training will generally be classroom-based, with the exception of casual staff, for whom a self-guided learning module has been developed.

Training for Supervisors/Managers

Supervisors from Gaming, Food & Beverage, and Security and Surveillance must participate in supplementary Supervisor/Manager training (four hours). This training will be face-to-face, classroom-based, and will include both theoretical and practical components and can be completed in modules using a wide range of learning techniques suitable to the Lasseters Wharf Casino environment. This is to be undertaken within three months of commencement or promotion to a Supervisor/Manager position. The training includes information on:

- identification of problem gamblers;
- initial action with respect to customers requesting problem gambling assistance;
- identification and intervention with respect to excessive alcohol consumption;
- Lasseters Wharf Casino legal and regulatory requirements;
- intervention including brief interventions, de-escalation and motivational interviewing;
- debriefing and staff support;
- problem gambling treatment processes;
- cultural awareness; and
- advanced Responsible Service of Alcohol – intervention and slowing service.

Refresher training

Lasseters Wharf Casino provides department-based, site-wide refresher training on an ongoing basis. Refresher training is provided when a learning development need is identified or requested.

General Manager Training Sale of Liquor Act

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

Suicide-Awareness Training

Lasseters Wharf Casino will contract a qualified service provider to provide suicide-awareness training to staff.

Informal learning and development

As learning and development is an ongoing process, Lasseters Wharf Casino provides a range of other learning to occur, including:

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

Evaluation

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

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

2.10 Identification of problem gamblers

Lasseters Wharf Casino's Problem Gambler Identification Policy forms part of the Host Responsibility Programme. The policy fulfils Lasseters Wharf Casino's obligations under the section of the Act.

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

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

This policy must be made available upon request. Lasseters Wharf 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:

- the self-exclusion procedure available; and
- any procedures described by Regulations made under the Act.

The methods and procedures by which these are implemented are set out in the attached **Problem Gambler Identification Policy**.

3.0 Monitoring and Reporting

Introduction

Lasseters Wharf Casino will evaluate its performance against the objectives of the Programme.

The Lasseters Wharf 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.

As the Programme is implemented and embedded into the business, and any initiatives are developed, Lasseters Wharf Casino may seek to amend this section of the Programme, prior to the Commission's next two-yearly review.

Reports to the Gambling Commission

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

The first report will be provided 12 months after the Programme is notified by the Commission.

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 Lasseters Wharf Casino under the Programme.
- Reporting against the measures specified below, including a comparison to previous data where applicable. For its first report, Lasseters Wharf Casino will agree with the Commission on the data available to be presented (given that some of the measures will require Lasseters Wharf Casino to collect new information).
- Lasseters Wharf Casino discussion on the effectiveness of the Programme and the extent to which Programme objectives in Section One 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 DIA and other meetings held as required.
- 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. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of indicators reported to Host Responsibility. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of approaches to Lasseters Wharf Casino by third parties. 	Lasseters Wharf 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. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of customers on incident spreadsheet. 	Lasseters Wharf 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. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	Lasseters Wharf 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 (tables/EGM) - Prompted by third party disclosures - Exclusion types (self/casino) - Following re-entry. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in multi-site Exclusions. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of customers participating in Agreed Limitation Programme. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of Excluded customers agreeing to be contacted by help services on exclusion form. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> Number of new and total clients citing casino gambling (by EGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counselling services by: <ul style="list-style-type: none"> - Gamblers - Significant others - Mean SOGS scores - Ethnicity - Gender - Age - Self-reported dollars lost. 	MoH Report	Annual

<ul style="list-style-type: none"> • Average SOGS scores of clients citing casino gambling as the primary mode who utilise face-to-face counselling services. 	MoH Report	Annual
<ul style="list-style-type: none"> • Number of breaches of exclusion by: <ul style="list-style-type: none"> - Ethnicity - Gender - Age. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> • Number of successful and unsuccessful applications to re-enter following exclusion. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> • The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff). 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> • Number of persons trespassed or required to leave for making loans or financial gain. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> • Number of parents of unattended children detected and trespassed. 	Lasseters Wharf Casino	Annual
<ul style="list-style-type: none"> • Number of Police contacts citing Lasseters Wharf Casino as the venue where they gamble within two hours of their offending or coming to Police attention. 	Queenstown Police	Annual

Measures Relating to Responsible Consumption of Alcohol		
• Number of “Under the Influence” incidents (internal report).	Lasseters Wharf Casino	Annual
• Number of Police contacts citing Lasseters Wharf Casino as venue where their last drink was served.	Police Alcolink database	Annual
Measures Relating to Staff Training		
<ul style="list-style-type: none"> • Induction training. • Supervisor/Manager training. • Refresher training. • Number of staff who need to be trained in each category, and proportion of those staff who have completed the appropriate level training. 	Lasseters Wharf Casino	Annual
• Staff recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures.	Lasseters Wharf Casino	Annual
• Staff perceptions of the effectiveness of training.	L&D Evaluations	Annual
• Staff Perceptions on the effectiveness of the Employee Gambling Harm Programme.	Lasseters Wharf Casino	Annual
Other Programme activity and compliance-related measures		
• Number of internal and external underage incidents.	Lasseters Wharf Casino	Annual
• Number of incidents of unattended children.	Lasseters Wharf Casino	Annual

(Appendix A)

Current Host Responsibility Resources for Customers

“Are you gambling with more than just your money”- poster provided by the Gambling Helpline is 300mm x 215mm placed in key gaming areas.

“Problem Gambling, Knowing when to stop” – poster 280mm x 200mm providing Gambling Helpline contact phone number.

“Lasseters Wharf Casino Self-Exclusion” – Brochure containing information, and signs and symptoms of problem gambling. This will be available in a variety of languages and will provide the Gambling Helpline telephone number and the outline the problem gambling counselling services.

“Are you gambling with more than just your money?” - Brochure containing definition of problem gambling, signs of problem gambling and contact phone number of Gambling Helpline. These brochures are located on the gaming floor and at the cash desk.

“Do you have a problem with gambling” – Brochure containing contact phone numbers for Gambling Helpline, Local Counselling Services and Multi-Lingual Counselling Services.

“Gambling Problem Helpline” - Brochure containing who they are (the service), about the service, what is problem gambling and what should people do if they think they have or know someone has a gambling problem. Also available in the Maori Language.

“Lasseters Wharf Casino Game Odds” – Brochure containing an overview of gaming machines, player returns, and the operation of the machines. It will also provide customer referral information regarding problem gambling. This will also be available in a variety of languages.

“Responsible Service of Alcohol Policy” - A4

The poster outlines Lasseters Wharf Casino’s:

- Refusal to serve minors, no identification no service.
- Refusal to serve customers who appear intoxicated.
- Intoxicated people will be required to leave premises.
- Food and Non – Alcoholic drinks available.
- Transportation options.

(Appendix B)



PROBLEM GAMBLER IDENTIFICATION POLICY

Problem Gambler Identification Policy

References: Gambling Act 2003 (“the Act”), sections 308, 309, 310, & 311

Objective

The Problem Gambler Identification Policy (“Policy”) has been developed pursuant to the Act to enable Lasseters Wharf 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 Lasseters Wharf Casino pursuant to section 308(1). Using this policy, all reasonable steps must be taken 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 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 310 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 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.

Scope of Lasseters Wharf 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 Lasseters Wharf Casino;
- a description of how indicator data is to be used by Lasseters Wharf Casino to identify problem gamblers;
- an outline of record keeping requirements and review of the Policy;
- problem gambling analysis.

Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

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

Section One – Definition of a Problem Gambler

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

“Harm” is defined as:

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

Section Two - Indicators of Problem Gambling

Introduction

Lasseters Wharf 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 status and the urgency of their situation.

Lasseters Wharf 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 likely to 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 (eg, they want to self-exclude), or do so indirectly.

Indicators

Strong Indicators

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

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, \$300+ lost per session) over a period of time (for example, one month).

- High visitation frequency (for example 2 times per week or more), combined with very high levels of expenditure on gaming machines (for example \$500+ 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; staying after friends/family leave.

Visible Emotional Disturbance

- Emotional distress including agitation, mood swings, crying, holding head in hands, or out-of-character behaviour.
- Personalising machines, including abuse of machines.
- Irritated by interruptions to gambling.
- Rudeness and complaints to staff about gambling outcomes.
- Possessiveness of particular machines or 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 the 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.
- Unattended children.
- Breach of an Agreed Limitation agreement.
- Previous breach - history of barring or exclusion orders.

Excessive access to Money

- Leaving the casino to get additional money and coming back after having appeared to have run out of money.
- Repeated ATM visits.
- Borrowing money including begging.
- Tray surfing.

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 EGM gambling involves very little interaction with casino staff, compared to table games, making it less likely that their behaviour and emotional reactions will be observed.
- There is a stronger relationship between problem gambling and play on EGMs than with other forms of casino gambling.
- Electronic data gathering from EGMs is more accurate than from table games.

OTHER OBSERVATIONS

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

Section Three - Sources of Indicator Data

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

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

CUSTOMER DISCLOSURES

Customer disclosures may or may not make reference to the person's gambling, ie 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.
- 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.
- 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, whether from customers or third parties, must be recorded and sent to the Security & Surveillance Shift Manager to be used in making problem gambling assessments.

BEHAVIOURAL OBSERVATIONS

Although staff cannot be expected to watch all customers on all occasions, the process of observation and identification is enhanced by the fact that one may observe a clustering of indicators. Those customers who present with strong indicators, or who produce several common indicators, may produce many more. In effect, problem gamblers may draw attention to themselves through observable behaviour. Staff should use this information to focus their observations to particular customers.

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

Staff who observe the indicators specified in Section Two must report the observation to the appropriate Supervisor/Manager. All observations of indicators reported to them by staff and any follow up responses taken by staff and/or Supervisors/Managers must be logged by the Security & Surveillance Shift Manager. The reported observations form part of the body of information upon which assessments of problem gambling are to be made.

CUSTOMER DATA INCLUDING LOYALTY

Where a customer is brought to the attention of Host Responsibility by disclosure or observation, Lasseters Wharf Casino must ascertain whether the customer is a Loyalty member. Where the customer is a member of the Loyalty Programme, Lasseters Wharf 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.
- Visitation frequency.

High levels of frequency and expenditure are indicators (see Section Two). Lasseters Wharf 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 Lasseters Wharf 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, staff might find that some players who spend very large amounts appear to be chasing their losses, or are making very frequent use of the

ATMs, or are leaving the casino and then returning with additional money. Lasseters Wharf Casino may also make enquiries about the affordability of the losses.

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, employer).

A third party may only seek general information about a customer, and will not always voluntarily identify gambling as the cause of their concerns about a customer (e.g. who may be a friend or relative of the inquirer). Where a third party appears to express general concern about a customer, staff 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 by the Security & Surveillance Shift Manager. Details are 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) is undertaken. If found, further inquiry will be undertaken and the customer may be requested to leave the premises for a period of time. The action is logged and sent through to the Security and Surveillance Shift Manager, a Gambler of Interest (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 is referred to Host Responsibility. The details are 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) is undertaken. If found, further inquiry will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Lasseters Wharf Casino shall also provide to the customer, problem gambler information, including exclusion options. The action is logged and sent through to the Security and Surveillance Shift Manager, a GOI file is 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 Lasseters Wharf Casino in corroborating information.

INTERVIEWS WITH CUSTOMERS OR STAFF

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

Customer interviews: During the course of an interview, information may be disclosed by a customer that suggests that s/he may be experiencing harm. All such information must be recorded and sent to the Security & Surveillance Shift Manager.

Staff interviews: During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm. This information must be recorded and sent to the Security & Surveillance Shift Manager.

Section Four - Identification

Section Two highlights the indicators that are taken into account in identifying whether a customer may be at risk, and the magnitude of that risk.

Section Three 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 identification process.

Lasseters Wharf Casino must use data from the sources identified in Section Three to assess whether a customer is a problem gambler, ie whether his or her gambling is causing harm, or is likely to cause harm, to the customer or to others. Lasseters Wharf Casino will make this determination based on information of actual harm, or by inferring (using indicators) that harm is occurring, has occurred, or is likely to occur.

Depending on the perceived severity and urgency of the situation, Lasseters Wharf Casino provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. If a customer is identified as a problem gambler, Lasseters Wharf Casino's legal obligations under sections 309-311 of the Gambling Act 2003 are engaged.

Obligation to Identify

The assessment by Lasseters Wharf Casino whether a customer is a problem gambler must be made in good faith, on the balance of probabilities, within a reasonable timeframe.

Analysis of Information

As outlined in Section Five, all disclosures or observations related to indicators of harm noted by staff are reported to and recorded by the Security and Surveillance Shift Manager as designated by the General Manager.

When a disclosure or observation is reported to the Security & Surveillance Shift Manager, s/he collates and reviews all information available to him/her in relation to the relevant customer. This includes a review of incident reporting and loyalty databases and other relevant internal information sources. S/he may also make further inquiries of relevant staff in relation to that customer.

The Secretary and Surveillance Shift Manager undertakes a risk and harm assessment based on the information collated. This assessment is dynamic in nature as customers may move up and down a continuum of harm, but recognises that intervention should be provided when harm is present, suspected, or may occur in the near future. The indicators of harm along with other relevant information are weighed up and considered.

A variety of different types of information is used when undertaking a risk and harm 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 assessment that a customer is a problem gambler, with Lasseters Wharf Casino taking prompt steps to assist any person who admits to having a gambling problem, or requests assistance to control his or her gambling.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler and already subject to significant gambling-related harm.

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 assessment that the case is urgent and that the customer requires immediate assistance. 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) Lasseters Wharf Casino would have reasonable grounds to consider such people to be problem gamblers.

Consequences of Identification

Once identified as a problem gambler, Lasseters Wharf Casino must:

- (a) if it has not done so already, open a GOI file;
- (b) as required in section 309 of the Act, offer assistance and information to the customer about problem gambling within a reasonable time of identification, taking into account the urgency of the situation and the risk of harm. As set out in section 309 of the Act the information or advice provided must include a description of self exclusion procedures.

Section Five - Record keeping

Recording, collation and analysis of information

The Security & Surveillance Shift Manager as designated by the General Manager collates, analyses and electronically records all information relating to indicators of harm noted by frontline staff, supervisors and managers. They also record third party disclosures, interactions and interventions undertaken in relation to a customer by frontline staff, supervisors and managers.

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 the Security & Surveillance Shift Manager:

- in circumstances where, having analysed information relating to a customer in accordance with Section Four, Security & Surveillance considers there is evidence that harm is occurring, has occurred or is likely to occur;
- a third party disclosure is made in relation to a customer's gambling;
- a customer returns from exclusion having fulfilled the re-entry criteria.

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

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

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

- monthly review for the duration of the investigation;
- formal 12 week review

When information becomes available or is obtained, a re-assessment of risk and harm will be undertaken. If an assessment is made that the customer is not a problem gambler after the 12 week review period, the GOI file is deactivated. If concerns remain, the file will be left open and reviewed on a regular basis.

All deactivated GOI files will be retained by Lasseters Wharf Casino. A GOI file may be reactivated at any stage subsequent to the 12 week review period if further information or indicators in relation to a

customer emerge. In this case, a reassessment of risk and harm will be undertaken, and monitoring will continue as part of the customer information review process.

Section Six - Review

Review

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

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