

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

**AND** the amendment by the Gambling Commission of the Responsible Gambling Programme for the **CHRISTCHURCH 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, 7 December 2012

Date of Notification of Decision: 13<sup>th</sup> December 2012

**DECISION**

**ON THE AMENDMENT BY THE GAMBLING COMMISSION OF THE RESPONSIBLE GAMBLING PROGRAMME FOR THE CHRISTCHURCH CASINO**

**Introduction**

1. By this decision, the Gambling Commission ("**Commission**") amends the Responsible Gambling Programme ("**RGP**") for the Christchurch casino, approved by the Casino Control Authority and dated 7 December 2001, and approves in its place the Host Responsibility Programme ("**HRP**") attached to this decision.

**Process**

2. Condition 29 of the licence conditions attached to Christchurch Casinos Limited's ("**CCL**") operator's licence provides that the Commission will review CCL's HRP every two years. The first revision was scheduled for 1 July 2009, or such later date as the Commission may approve. CCL submitted a draft HRP for Commission consideration on 1 July 2009.
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**"), Lifeline, Salvation Army, Gambling Helpline ("**GH**") and He Oranga Pounamu ("**HOP**") were invited to make written submissions on the draft HRP. Submissions were received from the Secretary, PGF, HOP and GH.
4. The Secretary, PGF, HOP, GH and CCL were invited to file submissions in reply. The Secretary, PGF and CCL did so.

5. The Commission considered CCL's amended draft at its September 2009 meeting. The Commission identified a number of areas requiring further consideration. 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.
6. The Commission recommenced its review of CCL's Programme in May 2012 by inviting CCL to submit an amended HRP for Commission consideration. The Commission received that document in June 2012.
7. Potentially interested parties comprising the Secretary, MoH, PGF, Lifeline, SA and HOP were invited to make submissions on the new draft. Submissions were received from the Secretary and MoH.
8. The Commission invited CCL, the Secretary and MoH to file submissions in reply, which the Secretary did.
9. The Commission considered CCL's amended draft HRP at its September 2012 meeting. The Commission identified a number of matters requiring further consideration and communicated those to CCL. CCL submitted an amended draft in November 2012, which the Commission considered at its December 2012 meeting. The Commission made a number of amendments before approving the HRP.

### **Background**

10. 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 CCL'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.
11. 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.

12. 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.
13. In May 2012, the Commission wrote to CCL inviting it to submit a new draft HRP for the Commission's consideration. CCL did so, submitting its draft in June 2012.

#### **Jurisdiction**

14. Condition 26 of the licence conditions attached to CCL's operator's licence specifies the matters which must be included in the HRP for Christchurch casino. Condition 26 provides:
  26. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
    - (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
    - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
    - (c) the provision of loss and expenditure data to individual loyalty programme members;
    - (d) identification of problem gamblers and steps to be taken following identification. This shall include, as a minimum, the following:
      - (i) an acceptable definition of problem gambling;
      - (ii) indicators of problem gambling in the gambling venue;
      - (iii) the steps to be taken by the Licence Holder in identifying problem gamblers;
      - (iv) the steps to be taken by the Licence Holder following identification of problem gamblers;
    - (e) the provision of staff training;

- (f) the provision of exclusion, self-exclusion and limitation programmes;
  - (g) assistance to casino employees with managing the potential for personal problem gambling;
  - (h) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
  - (i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;
  - (j) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
  - (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
  - (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
  - (m) standards of dress and behaviour at the casino;
  - (n) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
  - (o) liaison with problem gambling treatment providers, community service organisations and community representatives;
  - (p) the provision of a safe gambling environment at the casino; and
  - (q) such other matters as the Commission may require.
15. The HRP address the matters specified in condition 26, many of which, in turn, specify how CCL will implement obligations under the Gambling Act 2003 ("Act") and Regulations.
16. In relation to conditions 26(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.
17. 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.
18. 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.

19. The HRP specifies how CCL will exercise its discretion to exclude a problem gambler who has not requested exclusion.

#### **Submissions to the Commission**

20. As noted above, the Commission received submissions in 2009 on CCL's first draft. Those submissions were of value to the Commission's consideration of that draft, but were overtaken once CCL filed an amended Programme in 2012. This decision therefore focuses on the 2012 draft and the submissions made on it.
21. Initial submissions on the 2012 draft identified the following "macro" areas for consideration in the first draft of the HRP:
- (a) the transfer of information from the main body of the HRP;
  - (b) the failure to include a gambling limitation programme;
  - (c) the structure and content of the Problem Gambler Identification Policy ("**PGIP**").

#### *Transfer of information*

22. CCL transferred the "Unattended Children", "Standards of Dress and Behaviour" and "Underage Persons" sections from the main body of the HRP to an appendix attached to the HRP. Similarly, CCL transferred the "Exclusions" section to the PGIP, and created a separate document addressing the responsible service of alcohol. The Secretary opposed the transfer, submitting that these sections should be retained in the main body of the HRP, otherwise their importance may be undermined.
23. The Commission agreed with the Secretary's submission. As the Commission noted in decision GC14/12, relevant detail should be retained within the main body of the HRP because the separation of obligations could create the impression that those obligations contained in an Appendix are of less importance than those retained in the main body. Also, locating all obligations together makes the HRP more user-friendly as it provides greater clarity and ease of reference.

#### *Failure to include a gambling limitation programme*

24. Condition 26(f) of CCL's operator's licence provides that Christchurch's HRP must contain, amongst other things, a gambling limitation programme. Christchurch's proposal did not do so, and CCL offered no explanation as to why.

25. The Commission's view was that the licence condition requires CCL to offer a gambling limitation programme, so CCL must do so.

*The Problem Gambler Identification Policy*

26. Compared to Hamilton's PGIP, the Secretary noted that CCL's PGIP did not contain a considerable amount of information with no explanation as to why. For example, many of the "General Indicators" were removed from section 2, while most of section 3 and parts of sections 4 and 5 were also removed.
27. When considering the PGIPs for the Hamilton and Queenstown casinos, the Commission stated that all PGIPs should closely follow the PGIP approved for the Auckland casino, unless the amendments improve the document, or reflect individual differences between the casinos. The Commission was of the view that CCL's amendments did neither of these and should be amended accordingly.

**Other amendments to the HRP**

28. In addition to the abovementioned "macro" issues, the submission process identified a number of specific amendments that required Commission consideration. In particular, the Secretary identified deletions or amendments (compared to the Hamilton documents) to a number of areas which he did not agree with, as follows:

- Section 1.1 Statement of Position – the third paragraph was deleted;
- Section 2.0 Harm Minimisation and Prevention Components – Roles and Responsibilities – the last two paragraphs were mostly deleted;
- Section 2.1 Policies and Procedures – Standard Operating Procedures – the final three bullet points were deleted;
- Section 2.1.2 Responsible Service of Alcohol – Approach – three bullet points were deleted;
- Section 2.1.3 Unattended Children – three paragraphs were deleted;
- Section 2.1.4 Underage Persons – specific provisions were not covered;
- Section 2.2 Host Responsibility Information for Customers – portions of the second and third paragraphs were deleted;
- Section 2.3 Employee Gambling-Related Harm – portions were deleted;

- Section 2.4 Stakeholder Engagement – the frequency of stakeholder meetings was not specified;
- Section 2.5 Environmental Design – a portion of the “Considerations” subsection was deleted;
- Section 2.6 Safe Gambling Environment – Gaming Machine Play – the requirement for the casino to take all reasonable and practicable steps to ensure that a customer does not play more than one gaming machine at a time was not included;
- Section 2.6.1 Safe Gambling Environment – Third Party Loans for Financial Gain – most of this section was deleted;
- Section 2.7 Responsible Marketing – Information was deleted from the “Requirements” section;
- Section 2.8 Display of Signage and Provision of Gaming Information to Customers – information was deleted from several parts of this section;
- Section 2.9 Learning and Development – Information was deleted from several parts of this section;
- Section 3.0 Monitoring and Reporting – Information was deleted from several parts of this section; and
- Appendix A Current Host Responsibility Resources for Customers – No information was provided in relation to matters such as information for third parties or information about unattended children.

29. The Commission concurred with the Secretary’s submissions.
30. The Secretary and MoH also made a number of general observations on the Host Responsibility Programmes in New Zealand which, they suggested, may be of value to the Christchurch HRP.

#### **Second iteration**

31. Following its consideration of the HRP, the Commission communicated its findings to CCL, and invited it to submit amended documents for further consideration. CCL did so in November 2012.



32. As CCL's amended documents closely follow the documents previously approved by the Commission for the Hamilton, Queenstown, Wharf and Dunedin casinos, the Commission identified only a small number of additional matters for amendment. Those matters were as follows:

*Section 2.0 – Harm Minimisation and Prevention Components*

33. The Commission added a sentence to clarify the term "frontline employee", and a sentence to clarify references to "Host Responsibility".

*Section 2.3 – Employee Gambling-Related Harm*

34. The Commission noted that the concluding paragraph ("work with surrounding Class 4 (Pubs and Clubs) venues ...") had been placed in this section in error, and relocated it to section 2.4 – "Stakeholder Engagement"

*Section 2.4 – Stakeholder Engagement*

35. The Commission amended this section to specify the organisations which CCL invites to its gambling liaison meetings.

*Section 2.8 – Display of Signage and Provision of Gaming Information to Customers*

36. The Commission amended the concluding paragraph of this section to align it with the drafting used in approved HRPs.

*Section 2.9 – Learning and Development – Overview of employee staff roles – Host responsibility*

37. The Commission made two amendments to this section to align the drafting used in approved HRPs – to provide that "Host Responsibility records, collates and assesses all information ..." and to provide that "the information is used to undertake an assessment of risk and harm ~~corroborate concerns~~."

*Appendix A – Current Host Responsibility Resources for Customers*

38. The Commission noted that CCL does not offer a brochure to parents or concerned citizens which provides any information on children at the casino. When the Commission considered this matter for the Dunedin casino, it directed DCML to draft a brochure on this matter, and allowed it 12 months to do so. The Commission was of the view that CCL should draft a similar brochure within the next 12 months, and included a measure in section 3.0 "Gambling Related Measures" to this effect.

*Additional submissions by the Secretary and submissions by MoH*

39. In addition to the abovementioned submissions, the Secretary stated that he had general observations on the HRPs that have already been approved. He stated that his observations may add value to the Commission's review of Christchurch's HRP, but noted that it is within the Commission's discretion as to how it utilises these comments.
40. These submissions on New Zealand's HRPs, which mirrored a number of submissions made by the MoH, are the same as those he made to the Commission in respect of the Wharf and Dunedin casinos.
41. The Commission addressed these issues in decision GC27/12.

**Conclusion**

42. 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 **21 January 2013**, replacing CCL's RGP dated **7 December 2001**. CCL is required to report next to the Commission in accordance with condition 29 and section 3 of the Programme, by **15 February 2014**.



Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

13<sup>th</sup> December 2012





CHRISTCHURCH  

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CASINO

HOST RESPONSIBILITY PROGRAMME  
CHRISTCHURCH CASINOS LIMITED

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*Appendix A – Current Host Responsibility Resources*

*Appendix B - Problem Gambler Identification Policy*

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# 1.0 Introduction

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**Approval**      Effective date: 21 January 2013

Manager: \_\_\_\_\_  
Brett Anderson  
Chief Executive

## 1.1 Statement of position

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

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

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

**Compliance with legal obligations** The Programme has been developed by Christchurch Casino and addresses the host responsibility conditions in the Casino Operator's Licence held by Christchurch Casinos Limited.

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

## 1.2 Programme objectives

<b>Objectives</b>	<p>The principal objectives of the Christchurch Casino Host Responsibility Programme include:</p> <ul style="list-style-type: none"><li>• Preventing the onset of gambling and/or alcohol related harm and minimising gambling related harm for customers and other persons potentially affected by their gambling behaviour</li><li>• Facilitating responsible gambling.</li></ul> <p>Christchurch Casino aims to fulfil these objectives by:</p> <ul style="list-style-type: none"><li>• Providing effective employee learning and development;</li><li>• Providing a safe gambling environment;</li><li>• Providing responsible marketing and promotional initiatives;</li><li>• Promoting the responsible consumption of alcohol; and</li><li>• Engaging effectively with stakeholders.</li></ul>
<b>Outcomes</b>	<p>Christchurch Casino intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol related harm to those customers who may be at risk. Reporting requirements relating to achievement of Programme objectives are set out in section 3.</p>

## 2.0 Harm minimisation and prevention components

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

- Policies and procedures
- Host responsibility information for customers
- Employee gambling-related harm
- Stakeholder engagement
- Environmental design
- Provision of safe gambling environments
- Marketing practices
- Display of signage and provision of gaming information to customers
- Employee learning and development
- Identification of problem gamblers
- Gambling limitation

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

### **Roles and Responsibilities**

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

The role is coordinated by the Host Responsibility Manager and is supported by senior managers including:

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

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

Reference in Christchurch Casino's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility" denotes the function managed by the Host Responsibility 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 the Christchurch Casino's Host Responsibility Programme. The policies and procedures are consistent with the Act, Regulations, licence conditions and this Programme, and will be updated to reflect changes.

### **Policies:**

- Problem Gambler Identification Policy

### **Standard Operating Procedures:**

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

- Exclusion
- 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** Christchurch Casino offers two types of exclusions:

- Self Exclusion; and
- Christchurch Casino Identified Exclusion (Casino Exclusion).

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

Casino Exclusion is for an appropriate period of up to two years and the customer must also meet re-entry conditions. Casino Exclusion is undertaken where a problem gambler does not take up Self Exclusion, and Christchurch Casino 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. Christchurch Casino imposes such an exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally made 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. Christchurch 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 employees undertake exclusions with customers. This is generally only the Host Responsibility, Security or Gaming Shift Managers.

**Features of the Exclusion Process** To ensure the effectiveness of the exclusion process, the following are features of the process:

### **Communication**

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

### **Third parties and service providers**

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

### **Other measures**

- Provides an updated database that is accessible to Security, Surveillance and Gaming employees 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 employees if a customer approaches requesting Self Exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone.
- Provides the opportunity for off-site Self-Exclusion procedures, e.g. Self-Exclusion forms are held by problem gambling service providers and can be completed at home.

### **Breaches**

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

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

**Loyalty Card Holders**

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

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

- Customer Services are advised within 24 hours of a Loyalty programme cardholder being excluded, trespassed or formally requested to leave the premises, to ensure the account is deactivated;
- forward any surrendered loyalty card(s) to the Customer Services desk.

Customer Services must:

- deactivate excluded cardholders' accounts;
- deactivate the accounts of cardholders who have been trespassed or formally requested to leave the premises;
- deactivate from mailing lists, cardholders who are excluded, trespassed or formally requested to leave the premises.

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

## 2.1.2 Responsible Service of Alcohol

**Background** The Christchurch Casino Responsible Service of Alcohol Programme is designed to ensure customers enjoy an environment that is safe and enjoyable. A key component is the Christchurch Casino Responsible Service of Alcohol training programme, which is designed for all frontline employees to promote effective team work to ensure customer safety and enjoyment.

Christchurch Casino's Responsible Service of Alcohol Programme is guided by the six key 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** Christchurch Casino's Responsible Service of Alcohol programme includes:

- Christchurch Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Christchurch Casino maintains an effective Responsible Service of Alcohol training programme to train and inform all frontline employees on the responsible sale and supply of alcohol.
- All Christchurch Casino frontline employees complete the Responsible Service of Alcohol training programme during induction as part of the HR1 Level training programme, including recognition of excessive alcohol consumption traits.
- Christchurch Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Christchurch Casino takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
- Any customer who appears under the age of 25 will be or will have been asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, the customer is not served or supplied with any alcohol.
- Employees tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of employees of similar social/ethnic background to the customers to assist in explaining the programme to customers when required.
- No person who appears intoxicated is served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another, without referral to a more senior employee.

- At all times, when liquor is sold or supplied to members of the public, there is a manager or managers on duty who hold current General Managers Certificates under the Sale of Liquor Act 1989.
- When appropriate, Christchurch Casino controls the hours of service and locations from which beverages are served.
- No complimentary alcoholic drinks will be supplied to customers participating in gaming except at the discretion of a Gaming Manager. This is not intended to prohibit normal complimentary Food and Beverage Service for customers, and does not require a customer to participate in gaming activity as a condition of service.
- Any customers invited to functions/events being hosted by Christchurch Casino must agree to abide by the Christchurch Casino Responsible Service of Alcohol Programme and procedures regarding Responsible Service of Alcohol.

### 2.1.3 Unattended children

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

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

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

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

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

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

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

## 2.1.4 Underage persons

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

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

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

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

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

## 2.1.5 Standards of dress and behaviour

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

**Dress Code** A smart and neat presentation is required at all times and management reserve the right to refuse entry. While it is difficult to be prescriptive the following are not permitted to be worn at Christchurch Casino:

- Beanies or caps
- stained, torn, dirty, ripped or frayed clothing
- casual street wear, skate shoes, jandals (thongs), flip-flops, beach sandals, crocs or steel capped boots.
- clothing with offensive designs/words
- gang patches or other insignias
- military clothing – unless worn by military personnel

**Behavioural Standards** If a customer is detected:

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

then Christchurch Casino employees must:

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

Customers exhibiting undesirable behaviour may be trespassed or excluded.

## 2.1.6 Gambling limitation

**Approach** The VIP Agreed Limitation Programme, referred to as 'Agreed Limitation', is a harm minimisation initiative for VIP customers. It is available on request to all VIP customers. Christchurch 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 re-assessed. 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 Christchurch 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.

## 2.2 Host Responsibility information for customers

### **Customer Information Resources**

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

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

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

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

A summary of Christchurch Casino's Host Responsibility resources for customers is shown in Appendix A.

## 2.3 Employee gambling-related harm

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

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

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

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

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

### **Information resources**

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

### **Policies and procedures**

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

**Recruitment**

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

**Support for employees**

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

## 2.4 Stakeholder engagement

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

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

- Understand and are aware of Christchurch 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 Christchurch Casino's Host Responsibility Programme and harm prevention and minimisation initiatives.
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

Christchurch Casino currently convenes a regular problem gambling liaison meeting (usually quarterly) to discuss host responsibility issues. These issues relate primarily to operational activities, for example, referrals and exclusions, etc. CCL invites the DIA, Salvation Army/Oasis, Pacific Island Evaluation Inc, Problem Gambling Foundation, Familial Trust, He Waka Tapu, and the Woodlands Trust.

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

Christchurch Casino will work with surrounding class 4 (pubs and clubs) venues to encourage the effectiveness of their host responsibility programmes.

## 2.5 Environmental design

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

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

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

This approach applies to the following Christchurch Casino areas:

- Floor lay-out, furnishing and design;
- Casino electronic gaming machine and table game location;
- Access to cash;
- Game and equipment features;
- Environments adjacent to the gambling area, including access to other entertainment options;
- Physical location and presence of Security and Host Responsibility;
- Location of information resources; and
- Access criteria, including dress codes and age restrictions.

**Requirements** Christchurch Casino shall in its environmental design seek to ensure:

- Problem/responsible gambling signage and exit points are clearly visible;
- Patrons are visible to venue employees in the gambling area;
- Machine alleys with no exit point and in dimly lit corners are avoided;
- Gambling area is well lit, utilising natural light where appropriate;
- Clocks are visible in the gambling area; and
- Other non-gambling entertainment options are available.

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

## 2.6 Safe gambling environment

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

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

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

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

**Requirements** Christchurch Casino will:

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

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

<b>Legislation</b>	Under section 15(1) of the Act, Christchurch Casino is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the former CCA or the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided at Christchurch Casino.
<b>Policy</b>	Christchurch Casino does not permit loan transactions by third parties for financial gain at the Casino, except as approved by the CCA or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or “loan sharking” as it is known.
<b>Requirements</b>	<ul style="list-style-type: none"><li>• Christchurch Casino will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.</li><li>• Christchurch Casino will take all reasonable steps to identify and exclude persons at the Casino offering loans for financial gain. To assist this process Christchurch Casino will develop an Undesirable Behaviour SOP which shall explain how Christchurch Casino will identify, investigate and respond to persons at the Casino suspected of offering loans for financial gain.</li><li>• Where Casino employees observe suspicious behaviour or information is presented from external parties regarding loan activity, Christchurch Casino will investigate and act in a timely manner. This process will be outlined in the Christchurch Casino Undesirable Behaviour SOP.</li><li>• If it is obvious that a person is engaged in offering or providing loans for financial gain, Christchurch Casino will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, Christchurch Casino may request the customer to leave the premises, pending further investigation. At the completion of its investigation, and where a person is found to be offering loans for financial gain, Christchurch Casino will issue that person with a trespass notice.</li><li>• Christchurch Casino will notify Department of Internal Affairs Gambling Inspectors in accordance with MOS for Records and Notification. Where appropriate, Christchurch Casino also notifies relevant agencies.</li><li>• Where a customer is established as receiving a loan for financial gain from a third party (ie not the Casino), Christchurch Casino will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.</li></ul>

- Depending on the outcome of the GOI investigation, the customer may be issued with a Christchurch Casino Identified Exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- Christchurch Casino will provide appropriate employee training to assist in preventing and minimising harm associated with loan sharking.

## 2.7 Responsible marketing

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

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

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

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

Does the marketing initiative:

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

## 2.8 Display of signage and provision of gaming information to customers

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

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

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

**Display of signs, brochures, clocks, website** Christchurch Casino ensures that:

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

Christchurch Casino will make available its 'taking the mystery out of the machine' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are or that skill can influence outcomes (where it cannot).

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

Christchurch Casino has a host responsibility section on its website.

**Display of game rules, permissible bets, 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 Gambling Act.

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

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

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the "taking the mystery out of the machine" brochure, which is available in the gambling area.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, the Gaming Floor Manager or other gaming employees can assist.

**Information Requests By Customers**

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

**Information on Gambling Activity**

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

Christchurch 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. This could include the number and length of their gambling sessions and their gambling expenditure.

## 2.9 Learning and development

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

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

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

### **Overview of employee Roles**

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

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

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

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

Supervisors and managers are also responsible for ensuring that all observations of indicators reported to them by employees, and follow up responses taken by employees 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:** Host Responsibility records, collates and assesses all information relating to indicators of problem gambling noted by frontline employees, supervisors and managers. Host Responsibility 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 by frontline employees, managers or supervisors or Host Responsibility. This may include meeting with customers. Host Responsibility is responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to employees.

## **Learning and Development Requirements**

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

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

- Responsible service of gambling and alcohol;
- Identification of problem gamblers;
- Reporting and recording procedures for observations;
- Approaching and providing information about problem gambling to players when an authorised person is not available, or the matter is urgent;
- Awareness of employee gambling-related harm.

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

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

Induction training will generally be classroom based.

### **Training for Supervisors (HR2 Level)**

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

- Identification of problem gamblers;
- Initial action with respect to customers requesting problem gambling assistance; and
- Identification and intervention with respect to excessive alcohol consumption.

### **Advanced Training (HR3 Level 3)**

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

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

- Christchurch Casino's legal and regulatory requirements;
- Identification of problem gamblers;
- Intervention including brief interventions, de-escalation and motivational interviewing;
- Debriefing and employees support;
- Problem gambling treatment processes;
- Cultural awareness;
- Advanced Responsible Service of Alcohol – intervention and slowing service;
- Awareness of employee gambling-related harm.
- Suicide awareness

### **Refresher Training**

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

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

### **General Manager Training – Sale of Liquor Act**

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

### **Suicide Awareness Training**

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

### **Informal learning and development**

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

- Internal communications e.g. employees newsletters;
- Inclusion in business or management processes e.g. employees meetings and key performance indicators.

### **Evaluation**

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

- Employee training feedback and evaluation forms;
- Employee knowledge recall and application of knowledge;
- Analysis of training needs.

## 2.10 Identification of problem gamblers

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

Section 308 requires 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. Christchurch Casino must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

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

The information or advice offered must include a description of:

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

## 3.0 Monitoring and reporting

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

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

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

**Reports to the Gambling Commission** Christchurch Casino will report annually to the Commission on the implementation of the Programme. 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 Christchurch Casino under the Programme.
- Reporting against the measures specified below, including a comparison to previous data where applicable. For its first report, Christchurch Casino will agree with the Commission on the data available to be presented (given that some of the measures specified below will require Christchurch Casino to collect new information).
- Christchurch Casino's discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the DIA and other meetings held as required.
- Proposed improvements to the Programme.

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
<ul style="list-style-type: none"> <li>Number of customers about whom there have been observations.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of indicators reported to Host Responsibility.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of approaches to Christchurch Casino by third parties.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>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.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers on incident spreadsheet</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of GOI files by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> <li>Preferred mode of gambling (tables/EGMs).</li> </ul> </li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of interventions conducted with customers.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of approaches to customers to offer information about self-exclusion.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of Exclusions by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> <li>Preferred mode of gambling</li> <li>Prompted by third party disclosures</li> <li>Exclusion type (self/Christchurch Casino)</li> <li>Timeframe</li> <li>Following re-entry.</li> </ul> </li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in multi venue Exclusions.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in multi casino Exclusions.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in Agreed Limitation programme.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of Excluded customers agreeing to be contacted by help services on exclusion form.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>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"> <li>Gamblers</li> <li>Significant others</li> <li>Mean SOGS scores</li> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> </ul> </li> <li>Self-reported dollars lost.</li> </ul>	MoH Report	Annual

<ul style="list-style-type: none"> <li>Average SOGS scores of clients citing casino gambling as the primary mode who utilise face-to-face counselling services.</li> </ul>	MoH Report	Annual
<ul style="list-style-type: none"> <li>Number of breaches of Exclusion by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> </ul> </li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of successful and unsuccessful applications to re-enter following exclusion.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and employee).</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of persons trespassed or required to leave for making loans for financial gain.</li> </ul>	Christchurch Casino	Annual
<b>Measures relating to Responsible Consumption of Alcohol</b>		
<ul style="list-style-type: none"> <li>Number of "Under the Influence" (UTI) incidents (internal report).</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of requests for people to leave due to the amount of alcohol consumed.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of Police contacts citing Christchurch Casino as venue where their last drink was served.</li> </ul>	Police Alcolink database	Annual
<b>Measures relating to Employee Training</b>		
<ul style="list-style-type: none"> <li>HR1 courses</li> <li>HR2 courses</li> <li>HR3 courses</li> <li>Refresher training</li> <li>Number of employees who need to be trained in each category, and proportion of those employees that have completed the appropriate level training.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Employee recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Employees' perceptions on the effectiveness of the Employee Gambling Harm Programme.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Results of tests conducted by employees relating to host responsibility and associated policies and procedures.</li> </ul>	Course Evaluations	Annual
<ul style="list-style-type: none"> <li>Employees' perceptions of the effectiveness of training.</li> </ul>	Course Evaluations	Annual
<b>Other Programme activity and compliance-related measures</b>		
<ul style="list-style-type: none"> <li>Number of internal and external underage incidents.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of unattended children.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Number of people requested to leave the Casino for other reasons.</li> </ul>	Christchurch Casino	Annual
<ul style="list-style-type: none"> <li>Completion of brochure addressing "Children at the Casino".</li> </ul>	Christchurch Casino	Annual

# Appendix A – Current Host Responsibility Resources

(as at December 2012)

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## **Brochures**

### **PlaySafe DrinkSafe:**

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

- Translations include:
  - o Chinese traditional characters
  - o Chinese simplified characters
  - o Korean
  - o Vietnamese

### **PlaySafe DrinkSafe quick guide:**

An all-encompassing wallet card sized brochure. It provides the reader with an understanding of the exclusion options, tips for playing and drinking safely and how to seek help.

### **Taking the mystery out of the machine:**

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

### **PlaySafe DrinkSafe 'not just for our customers':**

Available for all Casino employees, it offers tips on how to have a great night out safely; employees can take the 'eight screen' and assess themselves; and it provides a number of options if they need to speak with someone.

## **Wallet cards**

### **Is someone concerned about your gambling?**

A self-help card promoting helpline contact details.

## **Signage**

### **PlaySafe DrinkSafe 'know your limits'**

Aimed at encouraging customers to play and drink safely while at Christchurch Casino.

### **PlaySafe DrinkSafe 'your fun, your experience, your limits':**

Aimed at encouraging customers to play and drink safely while at Christchurch Casino.

### **Is someone concerned about your gambling?**

A self-help poster promoting helpline contact details.

### **Responsible service of alcohol policy poster:**

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

### **Conditions of entry:**

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

### **PlaySafe DrinkSafe 'not just for our customers':**

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

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# Appendix B



CHRISTCHURCH  

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CASINO

PROBLEM GAMBLER IDENTIFICATION POLICY  
(Gambling Act 2003, sections 308-311)

## **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 Christchurch Casino to take all reasonable steps to identify actual or potential problem gamblers and to act on that information.

### **Statutory Requirements**

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

Section 309 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 Christchurch Casino Problem Gambler Identification Policy**

This Policy describes:

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

## Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

- Information Collection and Collation
- Analysis and Intervention
- 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

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

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

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

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

Problem gamblers can be identified by inferring that harm is present or 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***

- Requests to self-exclude;
- Self-identified problem gambler;
- Self-disclosures that may or may not make reference to the person's gambling;
- Third-party disclosures that may or may not make reference to the person's gambling;
- 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, 1 month);
- High visitation frequency (for example 2 times per week or more), combined with very high levels of expenditure on gaming machines (for example, \$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 employees 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 barrings 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;
- Not having sufficient money to exit car park;
- 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 employees compared to table games, making it less likely that their behaviour and emotional reactions will be observed;
- There is a stronger relationship between problem gambling and play on 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 – employees are encouraged to report observations of customers based on other factors which raise concerns.

### **Section Three – Sources of Indicator Data**

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

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

## **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 Host Responsibility to be used in making problem gambling assessments.

## **BEHAVIOURAL OBSERVATIONS**

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

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

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

Employees who observe the indicators specified in Section 2 must report the observation to the appropriate supervisor/manager. All observations of indicators reported to them by employees and any follow up responses taken by employees and/or supervisors/managers must be logged by the supervisor/manager and sent through to Host Responsibility. 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, Christchurch Casino must ascertain whether the customer is a Loyalty member. Where the customer is a member of the Loyalty Programme, Christchurch Casino will examine their data to determine:

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

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

Christchurch Casino will include a flag in the loyalty card data to alert relevant employees to potential or problem gamblers on site.

## **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 friend or relative of the inquirer). Where a third party appears to express general concern about a customer, employees will ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this will be recorded by Host Responsibility. 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 enquiry 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 Host Responsibility, a GOI file is opened, and an investigation is undertaken.

A third party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and will be treated on an urgent basis. The third party is referred to a Shift Manager or Host Responsibility. 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 the customer is found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Christchurch Casino shall also provide to the customer problem gambler information, including exclusion options. The action is logged and sent through to Host Responsibility, 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 Christchurch Casino in corroborating information.

## **INTERVIEWS WITH CUSTOMERS OR EMPLOYEES**

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

**Customer interviews:** During the course of an interview, information may be disclosed by a customer that suggests that he/she may be experiencing harm. All such information must be recorded and sent to Host Responsibility.

**Employee interviews:** During the course of an interview, information may be disclosed by employees that suggests a customer may be experiencing harm. This information must be recorded and sent through to Host Responsibility.

## **Section Four - Identification**

Section 2 highlights the indicators that are taken into account in identifying whether a customer may be at risk, and the magnitude of that risk.

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

Christchurch Casino must use data from the sources identified in Section 3 to 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 others. Christchurch Casino will make this determination based on information of actual harm, or by inferring (using indicators) that harm is occurring, has occurred, or likely to occur.

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

### **Obligation to Identify**

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

### **Analysis of Information**

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

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

Host Responsibility undertakes a 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 interventions 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 Christchurch 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) Christchurch Casino would have reasonable grounds to consider such people to be problem gamblers.

## **Consequences of Identification**

Once identified as a problem gambler, Christchurch Casino must:

- (a) if it has not done so already, open a GOI file;
- (b) 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**

Host Responsibility will collate, analyse and electronically record all information relating to indicators of harm noted by frontline employees, supervisors, and managers. Host Responsibility will also record third party disclosures, interactions and interventions undertaken in relation to a customer by frontline employees, supervisors and managers. All information obtained is recorded in hard copy/electronic form by an appointed surveillance staff member.

### **GOI files**

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

- in circumstances where, having analysed information relating to a customer in accordance with Section 4, Host Responsibility 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.

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

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

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

Christchurch 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 Christchurch 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**

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

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