

Before Hearing Commissioners

under: the s134 of the Gambling Act 2003

in the matter of: Application for renewal of casino venue licence

between: **Christchurch Casinos Limited**
Applicant

and: **Gambling Commission**
Respondent

Statement of Evidence of Darren John Henderson (Christchurch
Casinos Limited)

Dated:

5 November 2018

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STATEMENT OF EVIDENCE OF DARREN JOHN HENDERSON

INTRODUCTION

- 1 My full name is Darren John Henderson.
- 2 I am the Asset Protection and Responsible Gambling Manager for Christchurch Casino Limited (*CCL*). I have worked for CCL for the past 24 years.
- 3 I am familiar with the application to which these proceedings relate and I am authorised to give this evidence for CCL.

SCOPE OF EVIDENCE

- 4 My evidence will deal with the following:
 - 4.1 My role at CCL;
 - 4.2 A brief History on Host Responsibility;
 - 4.3 The relationship with local Problem Gambling providers;
 - 4.4 Host Responsibility at Christchurch Casino, including:
 - (a) Host Responsibility procedures;
 - (b) The role of technology in Host Responsibility;
 - (c) Training staff in Host Responsibility; and
 - 4.5 Auditing and compliance requirements.

MY ROLE AT CCL

- 5 As the Asset Protection and Responsible Gambling Manager I take my role in ensuring that the Christchurch Casino is a fun yet safe entertainment venue very seriously.
- 6 I see my key role at CCL as providing a safe environment – both physically and mentally – at Christchurch Casino in order to allow customers to enjoy using our services and products responsibly.
- 7 I am one of a number of staff members whose role revolves around how Host Responsibility is managed and implemented at the casino.

A BRIEF HISTORY ON HOST RESPONSIBILITY

- 8 Host Responsibility at Christchurch Casino has continually evolved since its opening in 1994. Since its inception, the casino has had a "Responsible Gambling Programme."
- 9 Under this policy, the casino introduced a self-barring programme which provided a platform for individuals to self-identify and ban themselves from the casino. This was a voluntary programme which paved the way and informed CCL's current exclusion policies.
- 10 Under its Responsible Gambling Programme, CCL interacted with a large group of community agencies interested in promoting responsible gambling practices. The casino held meetings with these agencies three or four times a year, known as "Community Action for Responsible Gambling" (CARG). Those persons or organisations which were invited to attend the CARG meetings with CCL included:
- 10.1 Alcohol Drug Association;
 - 10.2 Christchurch City Council (the *Council*);
 - 10.3 Christchurch City Mission;
 - 10.4 Consumer Advisor;
 - 10.5 Department of Internal Affairs (the *DIA*);
 - 10.6 Familial Trust;
 - 10.7 He Oranga Pounamu;
 - 10.8 He Waka Tapu Trust;
 - 10.9 Lady Joy Simpson;
 - 10.10 Odyssey Trust;
 - 10.11 Problem Gambling Foundation (the *PGF*);
 - 10.12 Salvation Army Oasis Centre for Problem Gambling (the *Salvation Army*); and
 - 10.13 The Royal New Zealand College of General Practitioners.
- Appendix 1** contains examples of minutes and attendances of the CARG meetings.
- 11 The Gambling Act 2003 (the *Gambling Act*) brought about significant changes from the previous Casino Control Act 1990, redirecting the focus of casinos away from promoting tourism and jobs to one of

controlling the growth of gambling and minimising harm associated with problem gambling.

- 12 In January 2007, the first Host Responsibility Manager was appointed by CCL and the CARG meetings were replaced with Problem Gambling Liaison Meetings (*PGLMs*) to give effect to the Gambling Act.
- 13 In 2009, the Responsible Gambling Programme was replaced with Christchurch Casino's first Host Responsibility Programme (*HRP*), approved by the Gambling Commission, which placed greater emphasis on harm minimisation as per the Gambling Act.
- 14 Since then CCL has worked constantly to develop and improve its HRP. Its current HRP ensures that the venue provides a safe gambling environment by facilitating the safe use of gambling products and the responsible consumption of alcohol.
- 15 In January 2015, the role of Host Responsibility Executive was created to replace the former manager role and redirect the reporting line from Risk and Compliance to the Security and Surveillance Department within Christchurch Casino.
- 16 The new appointment was intended to further raise the profile of Host Responsibility and reinforce a staff culture around customer care. The changed reporting line ensured Host Responsibility had more operational and 'ground level' support, making the HRP a key part of day to day operations of the casino among all employees.

RELATIONSHIP WITH LOCAL PROBLEM GAMBLING SERVICE PROVIDERS

- 17 As mentioned above, Problem Gambling Liaison Meetings (*PGLMs*) were introduced following the passing of the Gambling Act to replace CARG.
- 18 The focus of these meetings has developed to be very customer-centric over the years with all parties working together for the best outcome for the individual.
- 19 The casino holds three *PGLMs* a year attended by various problem gambling service providers and the local DIA. In recent times the regular attendees have included representatives from PGF, Salvation Army and the DIA together with four or five relevant Casino staff.
- 20 These meetings are used to provide updates on Host Responsibility activities, initiatives and reporting by the casino, to discuss host responsibility issues and to receive feedback from counselling representatives. **Appendix 2** contains examples of minutes and attendances of the *PGLMs*.

- 21 These meetings also facilitate occasions where casino staff visit problem gambling service providers and vice versa. For example, the Host Responsibility Executive has visited the PGF to meet with staff and process self-exclusions. Staff from both the PGF and the Salvation Army have visited the casino to gain a better understanding of the gambling environment their clients experience and the systems in place to identify problem gambling at the casino.
- 22 I consider that the casino and its staff have an excellent working relationship with local DIA and problem gambling treatment providers. Those of us who attend the PGLMs regularly are on a first name basis with each other and share the ultimate goal of minimising the harm from problem gambling.
- 23 CCL would not be opposed to the formalisation of the PGLMs into the licence conditions, and meeting the cost of the operation of the meetings. However, from experience we have found that three meeting times a year is appropriate to ensure the meetings are productive and necessary. Historically four meetings have been scheduled but attendees deemed this to be too often, especially with the very close working relationship that has developed.
- 24 Further, CCL is not averse to extending the invitation to the PGLMs to groups such as those identified in the Salvation Army submission who do not currently attend, including:
- 24.1 other local health and social service providers;
 - 24.2 the Council;
 - 24.3 the New Zealand Police;
 - 24.4 relevant community organisations; and
 - 24.5 local hāpu and iwi (such as Ngāi Tahu).
- 25 However, for this to work would require the full participation of these groups in the PGLMs. CCL has found in the past that certain groups have a dwindling interest in attendance and participation in the PGLMs.¹ For this reason, CCL considers an extended invitation to these organisations (rather than compulsory attendance) is appropriate to allow them to decide whether attendance at the PGLMs would be of benefit to their organisations.

¹ For example, in the past the Council has attended CARG meetings but no longer attends the PGLM meetings.

HOST RESPONSIBILITY AT CHRISTCHURCH CASINO

- 26 Host Responsibility at Christchurch Casino consists of a number of internal policies:
- 26.1 the Host Responsibility Programme (*HRP*) approved every two years by the Gambling Commission (see **Appendix 3**);
 - 26.2 the Exclusion and Re-Entry Standard Operating Procedures (the *Exclusion SOP*) (see **Appendix 4**);² and
 - 26.3 the Responsible Service of Alcohol Policy (see **Appendix 5**).
- 27 The Casino's website contains a dedicated Host Responsibility page where all of these documents are accessible to the public along with the Playsafe/Drinksafe brochure entitled "Your Guide to Enjoying Christchurch Casino" available in four different languages.³
- 28 The Casino also provides a wide range of written information to its customers about Host Responsibility, including:
- 28.1 the Playsafe/Drinksafe brochure is available throughout the Casino, and in particular at the Cash Desk where it is given out whenever a customer has a card decline;
 - 28.2 information panels in the gaming areas and in the toilet;
 - 28.3 contact information for the Gambling Helpline is on all EGM screens and on all gaming tables;
 - 28.4 information provided to Players' Club members whenever they receive an upgrade in Club status;
 - 28.5 small lanyard cards carried by staff members listing General Indicators and Strong Indicators of problem gambling, and signs of intoxication (see **Appendix 6**);
 - 28.6 other signage around the casino including digital displays and ATM screens; and
 - 28.7 messages on Christchurch Casino advertisements and promotional material.
- 29 CCL has taken a multi-faceted approach to improvements of Host Responsibility at Christchurch Casino through the development of

² The Salvation Army submission has brought to our attention that the Exclusion and Re-Entry SOP is not readily available on the Christchurch Casino website. CCL agrees that conditions of re-entry should be made clear and be readily accessible to the public, thus we have now made this available on the website under the "Host Responsibility" tab.

³ English, Korean, Chinese, and Hindi.

robust procedures, the use of technology systems for speed and efficiencies, and the commitment to a wide-range of staff training programmes.

Host Responsibility Procedures

- 30 The Gambling Act requires casino operators to exclude problem gamblers from the premises.
- 31 'Interventions' with problem gamblers are conducted by members of senior management who have experience in dealing with such situations.⁴ An intervention can be triggered in a number of ways, including:
- 31.1 a written report by staff recording observations of customer behaviour in the Host Responsibility Log (see **Appendix 7** for examples of various anonymised Host Responsibility Log entries);
 - 31.2 verbal communication from staff to a manager on incidents which require immediate intervention, which is then noted in Host Responsibility Log;
 - 31.3 Servizio alerts (see below at [62]for more detail);
 - 31.4 calls and information received from third parties (including problem gambling service providers, other Casinos, the TAB) expressing concerns about a customer's behaviour; and
 - 31.5 background analysis of available data (through staff, Players' Club records, etc.) on an individual customer over a period of time.
- 32 The first level of intervention is a direct approach by staff to discuss the customer's gambling. At this point the staff member will reinforce to the customer the Playsafe/Drinksafe messages and determine whether the customer is OK with their gambling.
- 33 Subsequent interventions or high risk occurrences result in an immediate intervention made by a Senior Operational Manager on duty to determine the degree of risk and options for harm minimisation.
- 34 A decision may then be made to classify that particular individual as a Gambler of Interest, which involves increased monitoring and reports of the customer's behaviours which is then reviewed

⁴ Such as the Host Responsibility Executive, Gaming Shift Manager, Gaming Floor Manager and Security and Customer Care Team Manager.

monthly. Or, in more serious cases, may result in a self-exclusion or casino-exclusion.

Exclusions and re-entry

- 35 Our exclusion policy is contained in clause 2.1.1 of our HRP and the conditions of re-entry are set out in the Exclusion SOP (**Appendices 3 and 4**). These provide for two types of exclusions: self-exclusions and casino-exclusions.
- 36 All exclusions are set for a period deemed appropriate for that individual of up to two years (either 3, 6, 12, or 24 months). All excluded persons are provided written information about local support services and the process for re-entry.
- 37 Customers who are excluded are prevented from entering the casino premises. A customer who enters a Designated Gaming Area in breach of a current exclusion order will be issued with a trespass notice dated for 24 months. Any such breaches will also be considered in determining suitability for re-entry.
- 38 Customers are not simply allowed to re-enter the casino once their exclusion period is over. For a customer to re-enter the casino following an exclusion, there are re-entry conditions that must be met. In my view, some customers will never meet these conditions and subsequently will not be allowed back into the casino.
- 39 If a customer enters the casino after expiry of their exclusion order but prior to being approved re-entry, they will be issued a further casino-exclusion for 3 months and be advised of the re-entry requirements and process.
- 40 All customers seeking re-entry must make an application to and attend a meeting with Host Responsibility managers. In this meeting we discuss with the customer their gambling behaviour prior to exclusion. We also cover whether they have been gambling elsewhere, any changes in circumstances that demonstrate a more positive life balance in respect to their gambling behaviour and views. A support person may also be present at this meeting.
- 41 In the situation where they are allowed to return we discuss how we can work with them to ensure their future gambling does not exceed a responsible level.
- 42 Customers whose exclusion term is for either 6, 12, or 24 months are also required to provide evidence that they have sought the assistance of a suitably qualified problem gambling counsellor.
- 43 Sometimes problem gambling counsellors arrange safety plans for a particular individual. The casino is provided with these and uses

them to help inform any decision made around further exclusion or re-entry.

- 44 While encouraged, the casino does not require mandatory counselling as a condition of re-entry for customers excluded for a period of three months – the shortest of the exclusion terms.
- 45 A three month exclusion is considered to be an 'early intervention' where counselling will not necessarily be required for that individual. It must be appreciated that it is not always appropriate to mandate counselling on an individual. The main goal of a three month exclusion is to give the individual a break in play and time to step away and reassess their gambling for themselves. I consider this is appropriate for minimising the harm of problem gambling in these specific circumstances.
- 46 In response to the Salvation Army submission, CCL considers that a blanket condition in its licence concerning mandatory counselling would not be appropriate. Re-entry conditions are a part of the HRP which is reviewed and approved by the Gambling Commission every 2 years. Flexibility is required around Host Responsibility policies to ensure these remain 'living documents' capable of constant improvement.
- 47 CCL also requires an individual on re-entry to become a Players' Club member (explained in more detail below). This allows the casino to keep a closer watch on that particular customer as the membership card facilitates a record of the amount of money, times, and frequency the customer is playing. It also allows the customer to set themselves thresholds or pre-commitment levels of spend and/or time to help them manage their play.
- 48 All customers who are granted re-entry remain a 'Gambler of Interest' (GOI) for 6 months following the exclusion. During this time, GOIs are closely monitored (through our various systems and technology) for any further signs of problem gambling or other undesirable behaviour. If such behaviour is identified by casino staff, the customer will have a further exclusion issued against them.
- 49 As at 31 October 2018, there were 386 people with current exclusions from the casino and 100 people being monitored as GOIs. **Appendix 8** contains various figures on exclusions, re-entries, and GOIs.
- Multi-venue exclusions***
- 50 Exclusions can also be managed across multiple venues (both casinos, other Class 4 venues, and TAB). The casino is made aware of these exclusions through direct contact with other venues or problem gambling organisations such as the Salvation Army.

51 Once we receive the appropriate information regarding these exclusions we load them into our system and treat them as if they were an exclusion of our own.

The role of technology in Host Responsibility

52 Christchurch Casino has invested significantly in technology to assist CCL in enforcing its HRP and to ensure the above procedures in place are effectively implemented.

53 Despite not being required, under current regulations and the Gambling Act, CCL has adopted a number of software initiatives solely for the purpose of Host Responsibility because we see it as the right thing to do.

54 Over the years in my position I have the opportunity to put forward new technology initiatives in Host Responsibility to the directors of CCL. I have not once been declined the requested resources required for the development and implementation of a robust and unique Host Responsibility programme.

55 I consider that the CCL directors understand the importance of Host Responsibility just as much as myself or any member of our floor staff. CCL is constantly striving for innovation, evolution and development in this area.

Membership and pre-commitment

56 CCL is able to monitor an individual's gaming activity through the use of membership cards for Players' Club members. The information gathered as a result is then used by the various other programmes to which CCL subscribes.

57 Further, Players' Club members are able to set a 'pre-commitment,' being a spend and/or time limit the customer sets themselves within a certain period.

58 All exceedances of these limits raise an alert on the casino's database which allows staff to respond appropriately. The player is warned at having reached 80% of these pre-committed levels and then again at 100%.

59 When 100% is reached a senior casino staff member will investigate and ask the player to leave. Although the card remains active, the system no longer awards any loyalty points and the person is unable to enter any promotional draws. A record of the intervention is also recorded in our Host Responsibility Log.

60 Each case is looked at on its circumstances as we have had experiences where the pre-commitment level has been established either in error or at an unintended level.

61 For those not using membership cards, there are a number of ways the casino is able to monitor play.

Servizio

62 We are currently using a mobile Host Responsibility alerts and reports programme called "Servizio" which has been operational since April 2016. It was trialled from late 2015.

63 Servizio was initially designed as an accounting and marketing tool. Using my technical background, I worked in collaboration with Bally Technologies⁵ to develop this system so that it could be used for Host Responsibility. Christchurch Casino now has a fully operational Host Responsibility model of Servizio which is constantly evolving and improving.

64 Servizio provides Christchurch Casino with real time alerts to staff around customers who engage in continuous play of 2½ hours or more on Electronic Gaming Machines (*EGMs*). Servizio also assists staff in identifying customers who have simply been in the casino for long periods of time.

65 From these alerts, there is an expectation on staff that all of these will be intervened with in some way or another. This usually involves a staff member approaching the particular customer to "check in" on their visit and then report to Host Responsibility from their positions on the Gaming Floor via a mobile device.

66 Servizio has been integrated with Christchurch Casino's systems and in conjunction with the facial recognition software, alerts staff of any persons of interest or banned customers who enter the premises.

Facial recognition

67 CCL has been working with Cognitec, a German company who specialise in the development of facial recognition software.

68 Initially trialled in August 2017 the system was fully implemented and operational in March 2018. The technology was introduced to assist with the detection of persons who should not be on our premises, primarily to assist with our Host Responsibility activities.

69 The software allows CCL to load pictures of persons who may be of interest to the casino and then identifies and alerts casino staff as to when these people enter the casino premises.

70 From here, staff quickly determine what approach to take, whether it be to approach the particular person or to keep them under observation.

⁵ Now called Scientific Games.

- 71 While the facial recognition software is still to an extent in the early stages of use at Christchurch Casino, the more data and information loaded and updated, the more efficient and effective it becomes as a Host Responsibility tool. To date, the system is operating at around 90% accuracy. False positives are kept to a minimum by ensuring the best quality image is loaded onto the system.
- 72 Prior to facial recognition, the previous system for identifying persons of interest was dependent on the accuracy of a staff member's memory to remember a particular person's face.
- 73 Within the last two months, the casino has had 63 'hits' on the facial recognition system. These people vary from persons banned from the premises, to GOIs, to persons the casino might wish to discuss other matters.

Problem Gambler algorithm

- 74 CCL has also been working with a Canadian-based company, Focal Research who undertake research on problem gambling. Together, CCL and Focal Research have developed custom software to help with the early identification of problem gamblers.
- 75 The software uses complicated algorithms to assess and compare an individual's pattern of play against other Christchurch Casino customers and recognised patterns of potentially harmful play.
- 76 The algorithm takes into account a range of factors including length of play, intensity of play, wins vs losses, and data from problem gambling studies.
- 77 The algorithm is still in the testing and proving stages but this is intended to be used in conjunction with Servizio and facial recognition in the near future.
- 78 I believe the combination of all of these initiatives places Christchurch Casino at the leading edge of Host Responsibility practice worldwide.

Future development of technology in Host Responsibility

- 79 Christchurch Casino does not intend on limiting its Host Responsibility programme to current initiatives. It is constantly looking for ways to grow and improve its policies and procedures.
- 80 CCL is currently looking into the possibility of Servizio alerts being displayed as a live floor animation or graphical user interface.
- 81 We are also looking into how facial recognition can be used to calculate and record the amount of time someone is on site for both carded and uncarded play and their activities while on the premises.

TRAINING STAFF IN HOST RESPONSIBILITY

- 82 There are currently the equivalent of four full time positions whose entire role is dedicated to Host Responsibility. These are the Host Responsibility Executive, two full time Host Responsibility Officers and two seconded staff for 20 hours per week each to assist particularly on our busier days.
- 83 While this is our current dedicated team it is important to note that all staff are trained in Host Responsibility. It is very much a team effort.
- 84 Since the introduction of the Gambling Act there has definitely been a shift of focus and greater importance placed on this area of our business. I have also noticed a shift in employee attitudes towards Host Responsibility. Staff today see the wellbeing of the customer as a priority.
- 85 It should also be noted that all staff are on fixed pay rates and are in no way incentivised by casino revenue.⁶ This allows them to freely implement Host Responsibility policies without prejudice.
- 86 All Host Responsibility training is conducted in-house to more effectively deliver targeted, relevant, and recent material to staff. All training is developed by the Host Responsibility Executive with the assistance of other employees and managers. This means that material provided in training is specific and applicable to the casino.
- 87 Various levels of staff training are provided around Host Responsibility. At a minimum all employees undergo a one-hour Host Responsibility Induction course.
- 88 All licensed employees⁷ are required to attend an all-day training course which addresses Problem Gambling Awareness (*PGA*), the Responsible Service of Alcohol (*RSA*), and Anti-Money Laundering (*AML*) procedures.
- 89 All Food and Beverage employees must complete an additional 3-hour *RSA* training course and the Food and Beverage Team Leader, managers and supervisors undergo Level 2 *PGA* training.
- 90 Further, special training in Advanced Host Responsibility is required for all Gaming Floor Managers, Shift Managers, and Security Shift Managers addressing problem gambling interventions.

⁶ Other than the CEO of CCL.

⁷ 'Licensed employees' are those who hold a Certificate of Approval issued by the Department of Internal Affairs to work in a casino. This includes Surveillance, Gaming, Security, Cash Desk, Customer Services (Players Club) Desk, Technician, and administrative staff.

- 91 Finally, all employees must undertake a 2 hour refresher course in PGA and RSA every two years.
- 92 We have also worked with specialist organisations to introduce training in recognised and emerging areas of importance, including dementia and suicide awareness, mental health and workplace psychological first aid. Such training has been delivered to Security Shift Managers, Gaming Shift Managers, Host Responsibility and other senior managers over the past several years.

AUDITING AND COMPLIANCE

The Gambling Commission

- 93 The casino is required to make detailed annual reports to the Gambling Commission on various measures and indicators including:
- 93.1 the total number of observations of Casino patrons who have been observed showing one or more signs of problem gambling behaviour;
 - 93.2 the number of individual Casino patrons in the Host Responsibility Log;
 - 93.3 the number of active 'Gamblers of Interest'; and
 - 93.4 the number of individuals excluded by the Casino.
- 94 The numbers of individuals entered into the Host Responsibility Log has increased substantially in the last four years for a number of reasons including:
- 94.1 extensive training for all front line employees on problem gambling indicators and the importance of recording the same over time;
 - 94.2 greater accessibility of the Host Responsibility Log by all staff;
 - 94.3 alerts generated by technology (Servizio and Facial Recognition); and
 - 94.4 A dedicated Host Responsibility team.
- All of which are designed to assist in the early detection of problematic gambling behaviours.
- 95 The Gambling Commission also reviews and approves of the HRP every two years and was last completed earlier this year.

The Department of Internal Affairs

- 96 The Casino reports monthly to the DIA on matters relating to harm minimisation in the Gambling Act, including information relating to:
- 96.1 under-age gambling;
 - 96.2 unattended children in the car park;

- 96.3 begging;
 - 96.4 cheating and use of counterfeit chips or notes inside the casino;
 - 96.5 money laundering; and
 - 96.6 loan sharking.
- 97 In addition, DIA inspectors receive information about incidents from the casino through either:
- 97.1 daily reports at the end of each day which the inspectors must review and analyse; and
 - 97.2 calls from casino management alerting the DIA of incidents as and when they occur (such as incidents which may lead to a complaint being made to the DIA).
- 98 Further, the DIA has conducted two 'Mystery Shopper' exercises in New Zealand casinos and Class 4 gaming venues in 2014 and 2016.
- 99 In the 2016 DIA Mystery Shopper exercise, our Casino did not perform as we would have expected and did not identify an individual who had been playing for an extended period of time.
- 100 At the time of this exercise, Servizio was still in the testing stages of implementation and programmed primarily to detect high intensity play. The 2016 mystery shopper played at a much lower level of intensity than Servizio was programmed to detect and her behaviour was at a much lower level than our staff were trained to expect from someone displaying a gambling harm cue.
- 101 The casino was disappointed that Servizio did not detect the 'continuous' element of play of the mystery shopper. Since then, the casino has put safety checks in place to ensure that such a gambler would now be picked up by the system.
- 102 Since 2016, Christchurch Casino has been conducting its own internal mystery shopper exercises four times a year to test existing staff and programmes. As an example, these exercises consist of a person who comes in and plays continuously for 8-10 hours to test whether technology and staff observation will result in an intervention. The results from these have so far been 100%. I am confident that if the 2016 mystery shopper exercise was re-conducted the casino would exceed the DIA's expectations.
- 103 The Mystery Shopper model tested by the DIA has now changed. Tests are now conducted on a regular basis and could be any one of eight different scenarios at any time.

- 104 On occasion where our staff and systems do recognise people who display problematic behaviours (such as those tested by the mystery shoppers) we will always intervene for the wellbeing and safety of the individual and the integrity of the casino.

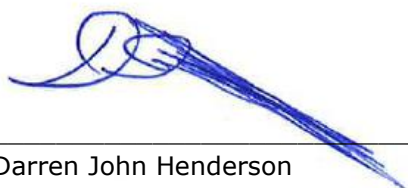
Submissions

- 105 One final comment I wish to make relates to the submissions received. I was pleased to see that there were relatively very few that were negative however there was one that particularly concerned me. This was the submission made by Ms Rapley.
- 106 In her submission Ms Rapley stated that her intellectually disabled family member had come to the Casino and lost \$16,000. I was personally disappointed in this notification and spent some time trying to identify if the person was known to the Casino.
- 107 Despite my searching of our databases I could find no record that came close to matching the circumstances as outlined. Without further information I am unable confirm that such a series of events either occurred or did not occur.

CONCLUSIONS

- 108 In summary:
- 108.1 I am proud of the Host Responsibility efforts that Christchurch Casino has implemented;
- 108.2 Christchurch Casino offers a very safe environment in which our customers can come and enjoy themselves responsibly;
- 108.3 Host responsibility is now deeply embedded in our culture. It is just an everyday part of what we all do, and while I may have the lead responsibility I am a part of a much bigger team all focused on doing the right thing for our customers; and
- 108.4 I am also confident that we will not stand still in terms of our Host Responsibility initiatives, rather that we will continue to explore new ways to improve.

Dated: 5 November 2018



Darren John Henderson

APPENDIX 1

From: John Wendelken <john@prsouth.co.nz>
Sent: Thursday, 13 April 2006 1:21 PM
To: CARG Member
Subject: CARG Meeting Proceedings

Hi there

Below is a brief summary of Wednesday's meeting proceedings for your information.

Please let me know if you have any queries or comments regarding this.

Thanks for your involvement and we look forward to keeping in touch with you between now and the next meeting in July.

Regards,

John Wendelken

PR South Ltd

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Email: john@prsouth.co.nz

PO Box 13507, Christchurch, New Zealand

PROCEEDINGS OF CARG MEETING - 12 APRIL 2006

Attendees: Joy Simpson, John Wendelken, Darren Henderson, Tim Bergin, Stephen Lyttelton, Peter Arbuckle, Graeme Watson, Kelvin Yardley, George Wynyard, Terry Moody, Blyda Mackie, Geoff Lumm, Kate Morgan, Simon Tam, Ian Ngan, Dale Peach, Quin Tang, Michael Gorman, Whiu Carrol, Mike Sheppard.

Apologies: Alan Woods, Steve Penrose, Laurie Seagal-Woodward, Deidre Sissons.

Joy Simpson welcomed a record turnout from members of local gambling treatment groups and Christchurch Casino representatives.

Darren Henderson brought members up to date with developments and trends on Casino customer exclusions, totalling 281 since July 04 - 149 of these being self-excluded. In this time were 34 breaches of exclusion orders and 15 were allowed to return after treatment. A high ratio of excluded people were not attending or completing treatment and until regulations stipulating treatment requirements are provided, this may be a continuing problem.

Tim Bergin reported the Casino's staff host responsibility training covered all employees and is an established and integral part of customer care. Current training package copies are available for anyone interested.

In addition, the Casino welcomes CARG members wishing to visit onsite and see for themselves how customer services operate in gambling and non-gambling areas.

Terry Moody reported the City Council is to make a recommendation on its non-casino gambling venue/machine policy in a month, and will seek public consultation on whether the existing moratorium on numbers should be retained, or lifted.

Stephen Lyttelton said last year's change in dress code for Casino entry has been well accepted and standards have been maintained. He also said that while the smoke-free implementation caused a decline in Casino revenue, this was recovering almost to prior levels.

Several CARG members expressed dissatisfaction with MoH funding methods for local treatment groups, saying too much was going to large national providers and many effective smaller organisations were being overlooked. It was agreed that the next meeting should invite a MoH representative to discuss this subject with CARG, along with a local MP.

Mike Sheppard advised that any information regarding pubs giving credit for gambling should be reported to him (at the Casino Gambling Inspectorate Office) or the ChCh Dept of Internal Affairs office, as it was important the DIA gained an understanding of alleged breaches of the law.

Costs of updating and reprinting the 4-year-old CARG 'Help' Directory are to be sought from funds derived from the problem gambling levy paid by gambling providers, or from an independent source.

Michael Gorman tabled a press release from the PGF website naming Christchurch as the gambling-related crime capital of NZ and asked if this publicity should go unchallenged. CARG members were advised to respond individually to such claims, if they wished.

The next meeting is scheduled for July at a time to be advised.

From: John Wendelken <john@prsouth.co.nz>
Sent: Friday, 30 March 2007 3:50 PM
To: Graeme Watson; George Wynyard; Darren Henderson; Gilbert Taurua; Caleb Taiala; Paul Rout; Steve Penrose; Whiu; Joy Simpson; Simon Tam; David Coom; Jessie Thompson; Michael Gorman; Mike Sheppard; Laurie Siegel-Woodward; Peter Arbuckle; Niall Holland; Tim Bergin; Terry Moody
Subject: CARG Meeting Report

Hi there

The CARG meeting held on 29 March was very informative for those attending.

Attendees were Caleb Taiala, Darren Henderson, Simon Tan, Terry Moody, Mike Sheppard, Michael Gorman, Paul Rout and John Wendelken.

For those unable to attend, here is a summary of the proceedings.

Caleb explained his role as the host responsibility manager for Christchurch Casino. He is committed to the principle of casino customers enjoying themselves and having fun, but also to ensuring a safe environment where the risk of gambling is kept to a minimum.

He stressed it was vital for casino staff and managers to work with problem gambling service providers to assist people who get into difficulty. Equally important was to maintain dialogue to improve awareness and understanding of their respective roles.

The meeting sought input from members on what they expect to receive from, or contribute to, CARG as an entity in the future.

Everyone agreed that a voluntary non-partisan forum, such as CARG, continuing to meet two or three times a year would be a sensible idea. It was important that local treatment providers and industry sectors could meet for frank and open discussion on topical gambling issues affecting the city and its diverse community of interests.

There was also support for the suggestion that more representatives of the gambling industry could be involved in meetings in future. In particular these should include representatives of trusts administering gaming machines, sports and working men's clubs, the TAB, etc. Such a development would be a "first" in New Zealand, and create a means for better identifying and addressing problem gambling issues and what remedies would be best to deal with these.

Further information on the above or related developments will be circulated in the near future.

Thanks to the Casino for its continuing hospitality.

If you have any comments or questions regarding this report, please get in touch with the undersigned.

Thanks very much.

John Wendelken
PR South
john@prsouth.co.nz
Tel 379 0450

APPENDIX 2

Minutes

Present CCL: Darren, Tim, Mike, Tony, Tom, Jess, Tyrina

Present (guest): Pete (DIA), Greg (DIA), Karena (PGF), Sue (PGF), Phil (PGF), Ritchie (SAOC)

Apologies: Graham (SAOC), Laura (SAOC)

Action points from last meeting

Tony – schedule next meeting for Dec

Current GOI info and stats

Presentation by Tony of stats of YTD and a review of those presented in Aug also.

Mention of decline in SE True number.

Pre-Commitment

System in place since Apr 2013. Mike explained system.

Current 433 enrolled. 18 in 3 months have had limit reached, 10 in error, 3 left before ATL, 5 ATL.

Pre-Com is recommended by HR when discussing RE with EGM players.

Cases to discuss/be informed on

IND ethnicity increase in HR stats.

AFS has ASH service (Auckland)

Discussion of counselling client whose husband also attending sessions. HR explained how we encourage (or require) a close support person at RE meetings to ensure another person is aware and can help monitor and also call CCL if concerned in future.

Other matters to discuss/be informed on

CCL explained why we re-Exclude expired.

Exclusion terms explained with RE conditions for 3, 6, 12, 24 months.

Exclusion Information Sheet presented/reviewed.

Feedback re Warning Letters sent by DIA – CCL stated that very few customer complained to CCL re receiving a Warning Letter for BOE, we believe 1 complaint recently (past 12-24 months).

Growth of HR team

Jess introduced and her expected contribution to the dept. explained.

HR expected to grow in future.

FR update and HR use with example

Darren explained FR and showed surveillance footage of a real approach when a breach was detected by FR. Humans and technology working together will be increasing in HR.

Servizio HR application project update, inc. presentation at NAGS

Explained system and presentation delivered at NAGS in November and mentioned the good feedback received from a range of attendees there. Tony mentioned he met Paula at NAGS and encouraged her to come in when she is in CHC sometime for a tour of our HR and discussions.

Update on HRP and key changes

Key change are Re-Entries now require minimum of 6 months as Active GOIs. Active GOI explained. SCAL HRP very similar in most respects. Next review in 2 years and open to submissions.

Update on Casino licence process

Discussion about the number of TGs and EGMs – these are not stipulated in the Act, these are Licence conditions, CCL not expecting change. Consultation on oral hearings expected early next year, must be completed by November 2018. 13 people noted in process as ‘of influence’ in CCL. Ngai Tahu was approached by the report authors re. Maori input.

Update on PG algorithm project

Working with Focal Research (Canada to develop). Currently the model is being built.

CCL/around the table discussions

DIA mystery shopper exercise in 2016 – resulted in many learnings. We also conduct our own to test/improve a range of HR practices.

PGF

Spike in C4 during/post EQ.

Some clients return for PG counselling but often general counselling is sought.

CCL’s general approach to HR (covering a range of areas) seems to be having a positive impact.

Both PGF and SAOC state that clients’ stories have been changing and less serious cases are presenting.

PGF states a clear increase in IND males.

PGF now in The Loft at Eastgate Mall - CCL states it will update Exclusion Information Sheet.

SAOC

States they have general concerns re. the level of care across C4 venues.

DIA

Generally quiet re. Casino compliance.

Had an interview re. the CCL licence renewal.

Focus on harm minimisation by the Dept.

Action points

CCL – update Ex Info Sheet with new PGF address

CCL – organise next meeting for around March

Minutes

Present CCL: Darren, Tim, Mike, Tony, Tom, Jess, Tyrina

Present (guest): Graham (SAOC), Katrin (SAOC), Laura (SAOC), Ritchie (SAOC), Karena (PGF), Leanne (PGF), Sue (PGF), Brenda (PGF), Annabelle (PGF), Sarah (PGF), Phil (PGF), Mary (GHL), Pete (DIA), Greg (DIA)

Apologies:

Action points from last meeting

Tony – schedule next meeting for March

Tony – update Ex Info Sheet. (Completed)

Current GOI info and stats

Presentation by Tony of stats of annual stats for 2017.

Breakdown of SE HR and SE True and CE True explained. SE True shown to have approx. halved.

Increase in GOIs due to HR's awareness of risk and increase number of reports.

Again, significant increase in reports to HR, mainly due to increase in approaches on the floor.

Good progress continues with RSA stats decreasing again.

Pre-Commitment

Mike explained system.

Over 400 enrolled – consistent but few regular customers. Many with 1 visit. Most approaches are still due to accidental set up; button changes being completed to hopefully assist with this.

Limit Reached explained as resulting in GSM approach and ATL.

Cases to discuss/be informed on

Discussion around promoting TPC from families.

Explained TPC is automatically/immediately GOI or RTL and with the level of reports now, we can usually find a reason to intervene without mentioning the TPC if they wish to remain anonymous.

Other matters to discuss/be informed on

Analysis of HR stats to assist in identifying risk (Tom)

Presentation of the work HR does to identify persons at risk using the data collected via all sources, inc interviews. Results used to identify and intervene better.

New floor role and growth of HR team (Jess)

Presentation by Jess of the development of monitoring of UC players using Servizio and note taking apps and the database HRL. Method proving to be somewhat effective. Testing with MS will be done by CCL.

FR update and HR use with example (Darren)

Darren gave a description of how we're using FR to detect not just banned people but also unknown people of concern to HR – such as those with declining bank cards at the Cash Desk.

System is proving effective and we're already seeing pleasing results.

The system is being disclosed to customers by HR to deter breaches.

Update on Casino licence process (Tim)

GC working hard to ensure a careful process is followed.

Application was lodged in Dec 2017.

James Burns and Jeff Butcher screened by GC for independence and suitability and approved to be report authors.

There will be ample opportunity to make submissions.

There will be public hearings for those who wish, GC will advise of when.

MVEs by email

Working well. Reminder to email "Host Responsibility" and also send 'portrait' style digital photo file.

SAOC and PGF please with this.

Focus on gateway products – Lotto, online scratchies, life-changing Jackpots

Raised by CCL given what seems to be becoming more prevalent. PGF states they are certainly monitoring these and share our concerns.

PGF

Wants to have MVEs in place for prisoners prior to release but cannot take devices into prison.

Possibly the Parole Board hearing is an opportunity to take the person's photo, PGF will enquire.

CCL willing to assist, inc with prison visits. Could be a good learning opportunity for HR also.

GHL

States there is often a comorbidity with other things such as depression.

GHL has been receiving more TPC and also older females.

PGF

States they've noticed an increase in OL gambling as mode.

Action points

CCL – organise next meeting for around Aug.

CCL/PGF/SAOC – look at info release forms and see if can be dated for 12 months so that any re-Excluded Patrons can be notified to counsellors by CCL.

CCL/PGF – arrange prison visit by HR. HR to send DLs through as ID.

Minutes

Present CCL: Darren, Tim, Mike, Tony, Tom, Jess

Present (guest): Karena (PGF), Laura (SAOC), Sarah (PGF), Sue (PGF), Stuart (DIA), Sonya (DIA)

Apologies: Graham (SAOC)

Action points from last meeting

CCL – organise next meeting for around Aug.

CCL/PGF/SAOC – look at info release forms and see if can be dated for 12 months so that any re-Excluded Patrons can be notified to counsellors by CCL. Completed - now indefinite and can be revoked by person any time.

CCL/PGF – arrange prison visit by HR. HR to send DLs through as ID. Completed - IDs sent and prison visited in April by Tom and Tony.

Current GOI info and stats

Presentation by Tony of stats for first half of CY18.

Results summary:

CE True decrease

SE HR increase

SE True increase – shows volatile nature of that stat, increase this year despite aggressive push to reduce last year proving effective

GOI same rate as 2017

HRL increase on 2017 due mainly to floor work from Jess

Pre-Commitment

Mike explained system.

Over 400 enrolled – consistent but few regular customers – 20 – 30 regular.

Number of approaches per month low, and that includes the accidental set ups.

Cases to discuss/be informed on

None from around the table.

Other matters to discuss/be informed on

Relationship building with Asian Family Services – HR visit AKL?

Karena will send details of main contact to engage with.

Re. the 6 sessions required by AFS, this is not because they think we (like SCAL used to) require it, its because their clients tend to be more difficult and harder to engage with and get truth out of.

New Cash Desk declines - approaches by trained staff as a response
New process explained where C1 will approach for repeated declines or declines then accept for smaller amount.

Focal algorithm now delivered and trial will commence
CCL will be testing the system with data we have to see if it detects those we know we did not and whether there is overlap (or how much overlap) between what it detects and HR also detects.
Also analysing/reviewing what it detects.

Servizio 'time on site' alert now in place
Explained that this new alert tells us at any time whether the same card was also used 8-10 hours ago. There could or could not have been a break or exit during that time, but we'll check and approach.

MVEs by email – working well.
Note to counsellors that some are already EX from CCL but we're renewing it with the MVE

Updated resources – 'Choice not chance' website on PSDS and EX Info Sheet translated soon

Clocks on screens at end of banks – photo
Presentation of photo with new live clock images on screens throughout venue.

Table Game buttons to alert HR
Used by dealers to alert of PGIs or when PSDS is issued or SE request is made

Explanation of UC walk and Servizio use on the floor
Part of this included how we tested this using a MS.

OCE policy
This was raised and CCL explained how and why and what happens when an OCE is detected.
Also explained how we can detect an OCE.

PGF update
Leanne White has resigned from PGF.

SE process explained
Used example of request made at Reception and prompt response by either HR or C1.

PSDS revision
Include Mapu Maia number
Change Asian Hotline to AFS
Remove Woodlands

Licence renewal
Submissions posted on GC website, PGF posted today.
CCC has submitted and posted a video of their discussions re. the licence online. They stated the number of PGs in CHC was higher than the national avg.

Action points

CCL – organise next meeting for around Nov-Dec.

CCL – contact AFS

CCL – update Group on PSDS changes

APPENDIX 3



CHRISTCHURCH

CASINO

HOST RESPONSIBILITY PROGRAMME
CHRISTCHURCH CASINOS LIMITED

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Appendix A – Current Host Responsibility Resources for Customers

Appendix B – Identification Policy

1.0 Introduction

Approval

Effective date: 13 November 2017

Manager:



Brett Anderson
Chief Executive

1.1 Statement of position

Statement of position

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

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

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

Compliance with legal obligations

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

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

1.2 Programme objectives

Objectives

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

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

Christchurch Casino aims to fulfil these objectives by:

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

Outcomes

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

2.0 Harm minimisation and prevention components

Introduction

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

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

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

Roles and responsibilities

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

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

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

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

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

2.1 Policies and procedures

Policies and procedures

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

Policies:

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

Standard operating procedures:

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

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

The following SOPs relate to the Problem Gambler Identification Policy:

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

2.1.1 Exclusion

Introduction

Christchurch Casino offers two types of exclusions:

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

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

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

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

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

Approaches to customers

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

Features of the exclusion process

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

Communication

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

Third parties and service providers

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

¹ Section 309A

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

Other measures

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

Breaches

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

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

Loyalty card holders

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

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

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

The Surveillance Operator or Customer Services must:

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

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

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

2.1.2 Responsible service of alcohol

Background

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

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

Our objectives, as a responsible host, are:

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

Approach

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

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

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

2.1.3 Unaccompanied children

Background

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

Approach

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

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

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

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

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

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

2.1.4 Underage persons

Background

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

Approach

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

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

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

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

2.1.5 Standards of dress and behaviour

Background

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

Dress code

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

Behavioural standards

If a customer is detected:

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

then Christchurch Casino employees must:

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

Customers exhibiting undesirable behaviour may be trespassed or excluded.

2.1.6 Long Hours of Presence or Play

Continuous Presence

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

As a minimum:

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

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

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

Continuous Play

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

As a minimum:

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

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

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

Uncarded

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

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

2.1.7 Gambling Limitation

Pre-Commitment

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

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

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

The features of the voluntary Pre-Commitment system include:

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

Agreed Limitation

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

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

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

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

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

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

2.1.8 Cashless Gambling

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

General Limits:

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

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

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

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

Limits in Restricted Areas:

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

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

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

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

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

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

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

2.2 Host responsibility information for customers

Customer information resources

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

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

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

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

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

2.3 Employee gambling-related harm

Introduction

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

Background

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

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

Requirements

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

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

Information resources

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

Policies and procedures

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

Recruitment

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

Support for employees

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

Engagement

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

2.4 Stakeholder engagement

Background

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

Approach

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

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

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

Christchurch Casino will invite representatives from:

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

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

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

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

2.5 Environmental design

Approach

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

Considerations

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

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

This approach applies to the following Christchurch Casino areas:

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

Requirements

Christchurch Casino shall in its environmental design seek to ensure:

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

Other regulatory processes

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

2.6 Safe gambling environment

Approach

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

Considerations

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

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

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

Requirements

Christchurch Casino will:

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

2.6.1 Safe gambling environment – third party loans for financial gain

Legislation

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

Policy

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

Requirements

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

2.6.2 Safe gambling environment – credit provision

Policy

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

Requirements

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

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

2.7 Responsible marketing

Legislation and industry codes

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

Requirements

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

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

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

Does the marketing initiative:

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

2.8 Display of signage and provision of gaming information to customers

Background

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

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

Approach

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

Display of signs, brochures, clocks and website

Christchurch Casino ensures that:

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

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

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

Christchurch Casino has a host responsibility section on its website.

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

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

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

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

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

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

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

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

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

Information requests by customers

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

Information on gambling activity

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

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

2.9 Learning and development

Introduction

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

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

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

Overview of employee roles

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

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

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

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

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

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

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

Learning and development requirements

Induction training (Level 1)

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

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

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

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

Induction training will generally be classroom based.

Training for Supervisors (Level 2)

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

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

Advanced training (Level 3)

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

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

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

Refresher training

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

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

General Manager training – Sale and Supply of Alcohol Act

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

Suicide awareness training

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

Informal learning and development

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

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

Evaluation

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

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

2.10 Identification of problem gamblers

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

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

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

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

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

The information or advice offered must include a description of:

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

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

3.0 Monitoring and reporting

Introduction

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

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

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

Reports to the Gambling Commission

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

Reports will include the following information:

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

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

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

Appendix A – Current Host Responsibility Resources

(as at June 2017)

Brochures

“PlaySafe DrinkSafe”

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

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

“Your guide to understanding gaming machines”

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

“PlaySafe DrinkSafe - not just for our customers”

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

“Unaccompanied Children – not even for a minute”

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

“Your guide to setting Playing Limits on gaming machines”

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

Signage

Customer Care – Code of Conduct

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

DrinkSafe

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

PlaySafe

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

Concerned about your own or someone else’s gambling?

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

Responsible service of alcohol policy:

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

Conditions of entry:

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

PlaySafe DrinkSafe 'not just for our customers':

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

Appendix B



CHRISTCHURCH

CASINO

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

Problem Gambler Identification Policy

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

Objective

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

Statutory Requirements

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

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

The information or advice offered must include a description of:

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

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

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

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

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

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

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

Scope of Christchurch Casino Problem Gambler Identification Policy

This Policy describes:

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

Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

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

Section One – Definition of a problem gambler

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

“Harm” is defined as:

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

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

As a general guide:

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

Section Two - Indicators of problem gambling

Introduction

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

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

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

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

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

INDICATORS

Strong Indicators

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

General indicators

Intensity and Frequency of Play

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

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

Visible Emotional Disturbance

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

Dysfunction in Social Behaviour

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

Excessive Access to Money

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

Expenditure and Frequency of Play

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

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

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

Other Observations

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

Section Three – Sources of Indicator Data

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

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

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

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

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

CUSTOMER DISCLOSURES

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

Direct disclosures

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

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

Indirect disclosures

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

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

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

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

BEHAVIOURAL OBSERVATIONS

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

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

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

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

CUSTOMER DATA INCLUDING LOYALTY

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

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

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

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

All relevant information will be recorded into the security and surveillance database as soon as practicable and made available to Host Responsibility.

THIRD PARTY DISCLOSURES

Information concerning gambling-related harm may also be obtained via third-parties. This might include:

- an enquiry from a concerned family/whanau member; or
- a formal enquiry about the potential problem gambler from the wider community (e.g. probation officer, general practitioner or employer).

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

A third party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and will be treated on an urgent basis. The third party must be referred immediately to a Shift Manager or Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g. via Loyalty card use, if available or feasible), should be undertaken. If the customer is found, further enquiry must be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, Christchurch Casino must also provide to the customer problem gambling information, including Exclusion options. The action must be logged into the security and surveillance database and made available to Host Responsibility as soon as practicable, a GOI file opened, and an investigation is undertaken.

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

INTERVIEWS WITH CUSTOMERS OR EMPLOYEES

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

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

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

Section Four - Identification

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

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

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

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

Obligation to Identify

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

Analysis of Information

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

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

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

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

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

Identification

Strong indicators

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

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

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

General indicators

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

Consequences of Identification

Once identified as a problem gambler, Christchurch Casino must:

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

¹ Section 309

² Section 310

³ Section 309A

Section Five – Record keeping

Recording, collation and analysis of information

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

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

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

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

GOI files

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

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

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

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

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

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

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

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

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

Section Six – Review

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

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

APPENDIX 4

Exclusion and Re-Entry SOP

Issuing Exclusion Orders

All staff are trained to report serious and general indicators of Problem Gambling, which include the immediate reporting of a Self-Exclusion request to appropriate staff for escalation and actioning.

All Exclusions are issued by:

- Host Responsibility, or a
- Security Shift Manager.

Gaming Shift Managers or other suitably-qualified employees may be used to assist in discussing gaming activities, transactions or other concerns with the customer.

Where a customer's ability to communicate in English is deemed as insufficient or if they express to communicate in another language, the Casino will attempt to have a translator assist; a translator may be a suitably-qualified employee or a support person nominated by the customer themselves.

In the case of a request of a Self-Exclusion, the customer's request is responded to as soon as practicable. The customer is invited to meet in private where necessary details are collected, or in the case of a loyalty programme member, confirmed or updated.

If a customer who is not a loyalty programme member requests a Self-Exclusion, they must present suitable ID for the Casino to be able to reasonably verify their identity or else the Self-Exclusion cannot be issued.

Casino-Exclusion Orders may be issued without having sighted suitable ID and may be issued with whatever amount of information the Casino may hold in situations where the person is not willing to provide personal details or present ID.

Both Self-Exclusion and Casino-Exclusion are issued for set periods of 3, 6, 12 or 24 months.

The term of the Exclusion is determined by what Host Responsibility or the Security Shift Manager issuing the Exclusion considers a suitable amount of time away from the Casino or is stipulated by a guideline. In the case of Self-Exclusion, Host Responsibility or the Security Shift Manager may decline a term stated by the customer if it is deemed as too short; the customer is required to opt for a longer term of Self-Exclusion or will be Casino-Excluded for such a term deemed as more suitable given the information obtained by the issuing employee.

A customer requesting a Self-Exclusion or being Casino-Excluded may choose to have documents relating to the Exclusion issued:

- in-person at the time, or
- sent by e-mail, or
- sent by postal mail.

The customer is always offered information in written form which includes the contact details for local support services available and the process for Re-Entry.

Customers are informed of the consequences for any breach of their Exclusion Order, as well as the consequences for entering prior to completing the formal Re-Entry process.

Host Responsibility or the Security Shift Manager issuing the Exclusion must as soon as practicable create a Security database file for the customer (or update an existing file) with details of the Exclusion and also notify Surveillance. Surveillance will in the case of all loyalty programme members immediately deactivate the card holder's account.

Multi-Venue and Multi-Casino Exclusions

Customers may choose or be offered to have a Multi-Venue or Multi-Casino Exclusion arranged for them. Multi-Venue Exclusions are explained as covering Class 4 venues in the customer's local area, whereas Multi-Casino Exclusions are explained as covering any or all of the 6 casinos in NZ. In the case of a Multi-Venue or Multi-Casino Exclusion being requested, Host Responsibility must be immediately notified so as to coordinate this request as soon as practicable.

Where Christchurch Casino is advised of a Multi-Venue Exclusion or Multi-Casino Exclusion request by a third party, the request is to be sent to Host Responsibility, who will action the request as soon as practicable by issuing a Self-Exclusion Order.

Loyalty programme members and Exclusions

Loyalty programme members may be given the opportunity to immediately redeem all current programme points. Loyalty programme members will have their membership card confiscated. Loyalty programme members are advised at the time of the issuing of an Exclusion Order that any promotional offers or invitations they may have been sent are now void and non-transferrable.

Host Responsibility will remove a loyalty programme member from any mailing lists not yet sent.

Re-Entry procedure

Re-Entry applications must be made to Host Responsibility by all Excluded persons.

All customers seeking Re-Entry into the Casino must complete, at the very least, a meeting with Host Responsibility and be approved as a result of such for Re-Entry.

Christchurch Casino's policy is that:

- Customers whose Exclusion term is 3 months
 - must attend a meeting with Host Responsibility.
- Customers whose Exclusion term is 6, 12 or 24 months
 - must attend a meeting with Host Responsibility, and
 - may also be required to provide evidence that they have sought the assistance of a suitably qualified Problem Gambling counsellor.

Any breach of a person's Exclusion may be factored into a decision regarding their suitability to be approved for Re-Entry.

Breach of Exclusion

Customers who enter a Designated Gaming Area in breach of a current Exclusion Order for the first time will be issued with:

- a Trespass Notice dated for 24 months.

Security Shift Managers or Host Responsibility are tasked with the actioning of this response and are also required to notify the DIA Gambling Inspectors as soon as practicable. In such an instance, the customer is also warned that a consecutive breach of their Exclusion Order will result in further action against them by both the Casino and the DIA.

If a customer is found to be in breach of a current Exclusion Order for the second or more time and also in breach of a current Trespass Notice, the Casino will:

- contact the Police to have the person removed from the premises, and
- issue the person with a Trespass Notice dated for 24 months.

The Security Shift Manager or Host Responsibility must also notify the DIA Gambling Inspectors as soon as practicable.

Entry prior to completing Re-Entry

If a person is found to have entered any part of Christchurch Casino after the expiry of their Exclusion Order, but prior to being approved for Re-Entry, Host Responsibility or the Security Shift Manager will in the first instance:

- issue a Casino-Exclusion Order dated for 3 months and advise the person of the Re-Entry requirements of their previous exclusion.

If a person enters any part of Christchurch Casino after the expiry of an Exclusion Order issued under the requirement above, so after the expiry of a second, consecutive Exclusion Order, but prior to being approved for Re-Entry, Host Responsibility or the Security Shift Manager will:

- issue a Casino-Exclusion Order dated for 24 months and advise the person of the Re-Entry requirements for this Exclusion.

If a person enters in breach of any current Exclusion Order, the normal breach of Exclusion procedures apply, including for Exclusion Orders issued for 3 or 24 months to persons not having been approved for Re-Entry prior to entering.

APPENDIX 5



CHRISTCHURCH

CASINO

RESPONSIBLE SERVICE OF ALCOHOL POLICY
CHRISTCHURCH CASINOS LIMITED

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Introduction

Approval

Effective date: 1 November 2007

Revised Date: 1 October 2018



Brett Anderson
Chief Executive Officer

Introduction

The Christchurch Casino Responsible Service of Alcohol Policy is developed as our response to the requirements of the Sale and Supply of Alcohol Act 2012 and is guided by the six key principals of Host Responsibility (Health Promotion Agency, 2014) in licensed premises. Our policy is designed to ensure customers and employees enjoy an environment that is safe, responsible and regulated.

Sale and Supply of Alcohol Act 2012 requirements

The Sale and Supply of Alcohol Act, sections 237, 244, 245, 248, 249 and 253 requires the holder of a liquor licence to:

- Promote alcohol responsibly
 - Prohibit access to minors¹
 - Prohibit the sale or supply of liquor to an intoxicated person
 - Serve responsibly by not allowing customers to become intoxicated
 - Prohibit an intoxicated person from entering our premises
-

Objectives

The objective of the Sale and Supply of Alcohol Act is that:

The sale, supply and consumption of alcohol should be undertaken safely and responsibly; and the harm caused by the excessive or inappropriate consumption of alcohol should be minimised.

Our objectives are:

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

Definitions

Alcohol

Means a substance that is, or contains, a fermented, distilled, or spirituous liquor; and at 20°C is found on analysis to contain 1.15% or more ethanol by volume; or that is a frozen liquid, or a mixture of a frozen liquid and another substance or substances; and is alcohol (within the meaning of paragraph (a)) when completely thawed to 20°C; or that, whatever its form, is found on analysis to contain 1.15% or more ethanol by weight in a form that can be assimilated by people.

Intoxication

The Sale and Supply of Alcohol Act defines 'intoxication' as follows; intoxicated means observably affected by alcohol, other drugs, or other substances (or a combination of 2 or all of those things) to such a degree that 2 or more of the following are evident:

- (a) appearance is affected:
- (b) behaviour is impaired:
- (c) co-ordination is impaired:
- (d) speech is impaired

¹ The Sale and Supply of Alcohol Act deems a minor as under the age of 18 years for our purposes minors are under the age of 20 years in line with the Gambling Act 2003

Six Key Concepts of Host Responsibility

1. Intoxication

Preventing intoxication is one of the most important responsibilities as a licensee. Identifying problems early will help to prevent the onset of intoxication.

Signs of Intoxication

The following behaviours are indicators that a person may be under the influence of alcohol or drugs:

- A noticeable change in behaviour
- Becoming loud and boisterous, using offensive language suddenly, slurring or tripping over words, sudden mood switch to bad-tempered or aggressive
- Lack of judgement
- Being careless with money, buying drinks for strangers, complaining about the strength of drinks, and annoying other customers
- Clumsiness
- Spilling drinks, having difficulty picking up change or trouble removing articles from purse or wallet
- Loss of coordination
- Swaying and staggering, having difficulty in walking straight, bumping into furniture and other customers
- Decreased alertness
- Delays in responding to questions, drowsiness, not hearing or understanding others, tired or asleep in the bar

Policy

- 1.1. It will ensure intoxicated customers do not enter or remain on the premises
 - 1.2. It will ensure employees intervene appropriately to prevent possible problems arising from excessive alcohol consumption
 - 1.3. No person who appears intoxicated will be served or sold alcohol, allowed to gamble or be allowed to remain on the premises. The decision by any employee to withhold service for a specific time cannot be revoked or overruled by another
-

2. Responsible Service

Christchurch Casino is committed to serving and managing alcohol responsibly.

Policy

- 2.1. It will provide the sale of alcoholic beverages in a responsible manner, including monitoring and control of alcohol consumption
 - 2.2. At all times, when alcohol is being sold or supplied to members of the public, there will be a manager or managers on duty who hold current Managers Certificates under the Sale and Supply of Alcohol Act 2012
 - 2.3. Customers may not bring alcoholic beverages onto the premises where beverage service is provided, unless prior approval has been given
 - 2.4. Customers contracting to use any meeting room, banquet or out-catering facilities must agree to abide by the Christchurch Casino Responsible Service of Alcohol policy and procedures
 - 2.5. When appropriate, Christchurch Casino will control the hours of service and locations from which beverages are sold
-

3. Food & Beverage Alternatives

Food and low alcoholic beverages add to a great experience. It encourages customers to stay longer, provides extra revenue and helps avoid problems.

Policy

- 3.1. It will actively display and promote substantial food options and encourage customers to eat while consuming alcohol, menus will be made available during operational hours
 - 3.2. Low and non alcoholic beverages will be made available and actively promoted during all operational hours
-

Continued on next page

Six Key Concepts of Host Responsibility, continued

4. *Promotions*

Christchurch Casino is committed to promoting and marketing alcohol responsibly.

Policy

- 4.1. It will promote responsibly and in a way that doesn't encourage excessive alcohol consumption
 - 4.2. All alcohol related marketing and promotions need to be communicated and discussed with the Host Responsibility Manager
 - 4.3. Where concerns are raised by third parties Christchurch Casino will investigate and where appropriate take immediate action
-

5. *Minors and Intoxicated Persons*

Minors and intoxicated persons trying to enter our premises put themselves and those around them at risk.

Policy

- 5.1. Minors and intoxicated persons will not be allowed to enter Christchurch Casino premises
 - 5.2. When appropriate, any customer at any time may be asked for verification of identity and proof of age. If such identification cannot be produced, that customer may be asked to leave the premises. The following types of current identification are acceptable:
 - New Zealand passport
 - Overseas passport
 - New Zealand driver's licence
 - HANZ 18+ photo ID card
 - 5.3. If a minor or intoxicated person is found on the premises, they will be asked to leave immediately, (subject to any required processes for dealing with minors under the Gambling Act 2003, if applicable) and notification needs to be forwarded to the Host Responsibility Executive
-

6. *Transport*

As a responsible host you are required to help customers with access to transport alternatives and minimise the risk of them consuming alcohol and then driving.

Policy

- 6.1. It will promote the use of alternative transport including buses and taxis
 - 6.2. It will ensure signs with taxi and dial-a-driver numbers are clearly visible
 - 6.3. It will make available to customers a phone to contact alternative transport
 - 6.4. It may at certain times provide eligible customers with use of shuttle vans free-of-charge
-

Learning and Development

7. *Responsible Service of Alcohol Training*

Christchurch Casino is committed to providing all employees with the tools necessary to create a safe environment and serve alcohol responsibly.

Policy

- 7.1. All employees, including temporary and contract staff will receive at least a basic overview of the Responsible Service of Alcohol policy during induction as part of the Host Responsibility training programme, including recognition of excessive alcohol consumption indicators
 - 7.2. It will maintain an effective Responsible Service of Alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol which must be completed within a short time of commencing employment.
-

Drinking & Drugs

8. Drink spiking

Introduction

Customers who combine alcohol with other drugs risk magnifying the effects of either substance, making them more unpredictable than if they had just consumed alcohol.

Drink spiking is generally seen as having occurred when a substance has been covertly placed in a person's drink in order to sedate them or incapacitate their inhibitions.

Christchurch Casino does not tolerate this behaviour under any circumstances.

Signs of drink spiking

Customers who:

- Appear intoxicated in a short amount of time
- Complain of dizziness or queasiness/nausea
- Appear drowsy, confused, disoriented or lose consciousness
- Demonstrate wild behaviour, lack of self-control or increased confidence
- Have problems with co-ordination or partial paralysis

Policy

- 8.1. Customer care is paramount; Christchurch Casino will take all steps to ensure customer safety and provide appropriate care including; transport home, contacting emergency services and/or family or friends
 - 8.2. Any customer making a drink spiking claim will be taken seriously and will be thoroughly investigated by Christchurch Casino
 - 8.3. Police will be notified of every case as soon as practicable
-

Emergencies

9. Customer Care

Policy

- 9.1 If anyone collapses and is unconscious, from alcohol, drugs or a combination – or for any other reason, Christchurch Casino will call an ambulance immediately (ring 111).
-

APPENDIX 6

RESPONSIBLE SERVICE OF ALCOHOL

INTOXICATED

Deny & remove

INFLUENCED

Intervene

SOBER

Monitor & serve responsibly

Any **2** or more of the below signs means the customer is intoxicated:

- Speech impaired
- Coordination impaired
- Behaviour affected
- Appearance affected

We want **GREEN** customers.

ORANGE customers must be slowed down and monitored. **RED** customers must not be allowed to enter or remain onsite.



CHRISTCHURCH
CASINO

SIGNS OF PROBLEM GAMBLING

STRONG INDICATORS - IMMEDIATE RESPONSE

- Requests Self-Exclusion or assistance
- Comments about problems with gambling
- Emotional distress/emotional body language
- Another person is concerned
- Leaves children or others waiting in car

GENERAL INDICATORS - REPORT

- Agitation/anger/arguments/abuse of EGM/table
- Appearance/hygiene deteriorating
- Borrowing money/begging
- Card transaction declined - EFTPOS/credit card
- Claims EGM errors/complains about game return
- Comments about problems in life
- Concealing gambling/not using Players Club card
- Exceeding Pre-Commitment limit
- Excessive alcohol consumption
- Increased spending/visits/time playing
- Irritated by interruptions/avoids contact
- Long periods of play/very few breaks
- Looking for coins or credits on machines
- No money for carpark or F&B purchase
- Not celebrating a win/gambling winnings back
- Possessive/personalising machines/superstitious
- Repeat ATM or Cash Desk withdrawals
- Returning after running out of money
- Rudeness/complaints to staff or others
- Searching bags/wallets for additional money
- Tired or falling asleep

Gambling Helpline **0800 654 655**

APPENDIX 7

CHRISTCHURCH CASINO **Host Responsibility Log** [Add](#) [Edit](#) [Close](#) [Display only records requiring a patron ID link](#)

Report Date/Time: 02/11/2018 02:53:04

Department: Security

Location: L1 foyer

Employee:

Players Club #:

Patron Name: Unknown Male

Patron ID: [12852 Unknown UNKNOWN](#)

Report Type: Repeated ATM visits

Filter by Patron Name:

Filter by Players Club Number:

Filter by database patron ID:

Filter by Report Type:

Report Details

At 0010 Guest tried four times to make a withdraw from the Atm on Grand café side and was declined. He left the building after this. On his Receipt it showed zero balance.

I am writing this on behalf of ***** (Security Officer) as she witnessed this and by the time I got there the Guest had left.

When:
Nov 02, 2018 12:10 AM

Location:

HR Feedback:

PSDS Brochure Issued

CHRISTCHURCH CASINO **Host Responsibility Log** [Add](#) [Edit](#) [Close](#) [Display only records requiring a patron ID link](#)

Report Date/Time: 28/10/2018 02:38:55

Department: Gaming Tables

Location: 3205

Employee:

Players Club #:

Patron Name: Unknown Female

Patron ID:

Report Type: Long periods of play

Filter by Patron Name:

Filter by Players Club Number:

Filter by database patron ID:

Filter by Report Type:

Report Details

LP UC 2.5hrs. Indian female wearing blue traditional Indian dress. Seemed to be fine. Husband or partner playing beside her on #3204. Seems to be enjoying herself. No concerns.

HR Feedback: -

PSDS Brochure Issued

CHRISTCHURCH CASINO Host Responsibility Log		Add	Edit	Close	Display only records requiring a patron ID link
Report Date/Time	<input type="text" value="15/09/2018 22:51:41"/>	Filter by Patron Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
Department	<input type="text" value="Gaming Tables"/>	Filter by Players Club Number	<input type="text"/>	<input type="text"/>	<input type="text"/>
Location	<input type="text" value="AR01"/>	Filter by database patron ID	<input type="text"/>	<input type="text"/>	<input type="text"/>
Employee	<input type="text"/>	Filter by Report Type	<input type="text"/>	<input type="text"/>	<input type="text"/>
Players Club #	<input type="text"/>				
Patron Name	<input type="text"/>				
Patron ID	<input type="text"/>				
Report Type	<input type="text" value="Long periods of play"/>				
Report Details	<p>Observed player. Made approach as he was coming up to his 8hrs mark. Has been here since 14:40pm. Has had no significant breaks. Seemed to be in a good mood. Let him know about his TOS and he understood about that. Encouraged him to take breaks throughout the night and said that he will and understood. Will keep on monitoring.</p>				
HR Feedback	<input type="text" value="FUR - TRG"/>	PSDS Brochure Issuec			<input type="checkbox"/>

CHRISTCHURCH CASINO Host Responsibility Log		Add	Edit	Close	Display only records requiring a patron ID link
Report Date/Time	<input type="text" value="05/06/2018 16:49:48"/>	Filter by Patron Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
Department	<input type="text" value="Cashdesk"/>	Filter by Players Club Number	<input type="text"/>	<input type="text"/>	<input type="text"/>
Location	<input type="text" value="CD4"/>	Filter by database patron ID	<input type="text"/>	<input type="text"/>	<input type="text"/>
Employee	<input type="text"/>	Filter by Report Type	<input type="text"/>	<input type="text"/>	<input type="text"/>
Players Club #	<input type="text"/>				
Patron Name	<input type="text"/>				
Patron ID	<input type="text"/>				
Report Type	<input type="text" value="Credit & eftpos cards declining"/>				
Report Details	<p>@1647 #8633 korean man in 70s black puffer jacket declined for \$600 He tried for \$500 and accepted EDIT: card match 28/8/18 - JM - Identified via card match</p>				
HR Feedback	<input type="text" value="ILF - TRG"/>	PSDS Brochure Issuec			<input checked="" type="checkbox"/>

CHRISTCHURCH CASINO		Host Responsibility Log		Add	Edit	Close	Display only records requiring a patron ID link
Report Date/Time	<input type="text" value="07/08/2018 02:27:54"/>	Filter by Patron Name	<input type="text"/>				
Department	<input type="text" value="Gaming Tables"/>	Filter by Players Club Number	<input type="text"/>				
Location	<input type="text" value="BJ4"/>	Filter by database patron ID	<input type="text"/>				
Employee	<input type="text"/>	Filter by Report Type	<input type="text"/>				
Players Club #	<input type="text"/>						
Patron Name	<input type="text"/>						
Patron ID	<input type="text"/>						
Report Type	<input type="text" value="Agitation"/>						
Report Details	<p>Staff member advised that an Indian Male playing at her Table was of concern. He was chasing losses, betting erratically, playing Maximum bets at times. She spoke with him asking if he was Ok. He said he was. He was not a PC Member. He may be a visitor to Chch as he said he was looking for a job here and applying for a job at the Chch Club and if successful would be here (at the Casino) more often. Staff Member said at times he was shakey and agitated, hence her concern and questioning him if things were alright. Advised X Ray who are seeking a headshot to match this entry. - Edit - headshot saved - CW</p>						
HR Feedback	<input type="text" value="FUR - TRG"/>		PSDS Brochure Issued <input type="checkbox"/>				

CHRISTCHURCH CASINO		Host Responsibility Log		Add	Edit	Close	Display only records requiring a patron ID link
Report Date/Time	<input type="text" value="27/06/2018 13:36:02"/>	Filter by Patron Name	<input type="text"/>				
Department	<input type="text" value="Security"/>	Filter by Players Club Number	<input type="text"/>				
Location	<input type="text" value="HR"/>	Filter by database patron ID	<input type="text"/>				
Employee	<input type="text"/>	Filter by Report Type	<input type="text"/>				
Players Club #	<input type="text"/>						
Patron Name	<input type="text"/>						
Patron ID	<input type="text"/>						
Report Type	<input type="text" value="Increased Expenditure"/>						
Report Details	<p>Featured in daily Bronze report with \$1.2CW - first visit since Feb</p>						
HR Feedback	<input type="text" value="ILF - TRG"/>		PSDS Brochure Issued <input type="checkbox"/>				

APPENDIX 8

Figures on exclusions, re-entries, and Gamblers of Interest (GOIs)

	2013	2014	2015	2016	2017	Total
Total GOIs	29	70	107	146	237	589
Total Exclusions	6	15	20	20	19	80
Total re-entry applications	22	28	37	50	76	213
Total allowed re-entry	18	21	33	32	59	163
Total declined re-entry	4	7	4	18	17	50