

Before Hearing Commissioners

under: the s134 of the Gambling Act 2003

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

between: **Dunedin Casinos Limited**
Applicant

and: **Gambling Commission**
Respondent

Statement of evidence of Stacey Murray

Dated: 5 September 2024

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STATEMENT OF EVIDENCE OF STACEY MURRAY

INTRODUCTION

- 1 My full name is Stacey Aroha Emma Murray.
- 2 I am the Compliance Manager at Dunedin Casino Limited (*DCL*).
- 3 I have worked in the casino industry for just under 20 years. I have had several roles in the casino predominantly in Gaming departments, prior to my current role.
- 4 I am familiar with the application to which these proceedings relate, and I am authorised to give this evidence for DCL.

SCOPE OF EVIDENCE

- 5 My evidence will deal with the following:
 - 5.1 My role at DCL;
 - 5.2 A brief history on host responsibility at the Grand Casino;
 - 5.3 The relationship with local problem gambling providers;
 - 5.4 Host responsibility at Grand Casino, including procedures, technology, and training of staff; and
 - 5.5 Host responsibility auditing and compliance requirements.

MY ROLE AT DCL

- 6 As the Compliance Manager my role oversees all of the Anti-Money Laundering (*AML*) processes of DCL and the administrative compliance of DCL's Host Responsibility obligations.
- 7 A key role of the administrative compliance of DCL's Host Responsibility obligations, is monitoring, reporting, and ensuring the casino's practices align with current internal policy, procedures, and legal requirements.
- 8 I oversee the documentation and management of incidents related to problem gambling or other host responsibility issues, ensuring that appropriate follow-up actions are taken.
- 9 I am one of several senior staff members who actively help, manage and implement Host Responsibility at the casino.

A BRIEF HISTORY ON HOST RESPONSIBILITY

- 10 Host responsibility at DCL has continually evolved since its opening in 1999. Since its inception, the casino has had a Host Responsibility Programme (referred to then as the Responsible Gambling Programme).
- 11 From the outset, the legislation required casinos to implement measures to minimize harm from gambling. This led to the development of host responsibility programmes, which include procedures on staff training, providing information about problem gambling, and offering support services to those in need.
- 12 The Gambling Act 2003 (*Act*) further strengthened host responsibility obligations on casinos by mandating more comprehensive measures be put in place. This Act emphasised the need for casinos to identify and assist problem gamblers, restrict alcohol consumption, and provide self-exclusion options.
- 13 Over the years, host responsibility has evolved to include a broader range of practices such as monitoring gambling behaviour, enforcing exclusion orders, and promoting a safer gambling environment. The focus remains on balancing the entertainment aspect of casinos with the need to protect vulnerable individuals from gambling-related harm.
- 14 DCL is committed to providing an environment that promotes safe gambling and is vigilant in preventing harm that can be caused by gambling.

THE RELATIONSHIP WITH LOCAL PROBLEM GAMBLING PROVIDERS

- 15 DCL hosts quarterly Community Liaison Meetings attended by various problem gambling services, local government representatives, and at least four relevant casino staff members. Organisations which are invited to attend Community Liaison Meetings with DCL include:
 - 15.1 Asian Family Services (Christchurch Branch);
 - 15.2 Dunedin City Council;
 - 15.3 Department of Internal Affairs (*DIA*);
 - 15.4 New Zealand Police;
 - 15.5 Otago University Dunedin – Student Health;
 - 15.6 Problem Gambling Foundation (*PGF*) (Dunedin Branch);

15.7 Salvation Army Oasis Centre for Problem Gambling (*Salvation Army*) (Dunedin Branch); and

15.8 Te Kāika - Ōtākou Health Limited.

- 16 These meetings are used to provide updates on host responsibility activities, initiatives and reporting by the casino, to discuss host responsibility issues and receive feedback from any attendees.
- 17 Any feedback received during the meetings is promptly followed up, although I note that feedback requiring implementation is rarely provided which I consider to be a positive sign that the casino maintains a high standard of host responsibility.
- 18 I consider that the casino and its staff have a positive working relationship with the local DIA, local government and local Dunedin problem gambling treatment providers. Those of us who attend the Community Liaison Meetings regularly are on a first name basis with each other and share the ultimate goal of minimising the harm from problem gambling.
- 19 We've found the meetings both productive and necessary, and our strong working relationships allow us to stay connected with attendees outside of these sessions.

HOST RESPONSIBILITY AT DUNEDIN CASINO

- 20 Host Responsibility at Dunedin Casino consists of a number of internal policies, including:
- 20.1 The Host Responsibility Programme (*HRP*) approved every three years by the Gambling Commission; and
- 20.2 The Host Responsibility Standard Operating Procedures.
- 21 In July 2022, the new HRP approved by the Commission in decision GC05/24 came into effect.
- 22 The Casino's website contains dedicated Host Responsibility¹ and Responsible Gambling² pages providing information to the public, including the contact details of local problem gambling treatment providers and a copy of the latest HRP.
- 23 The Casino also provides a wide range of written information to its customers about Host Responsibility, including through:

¹ <https://grandcasino.co.nz/grand-casino/host-responsibility/>

² <https://grandcasino.co.nz/grand-casino/responsible-gaming/>

- 23.1 Play Safe brochures;
- 23.2 Information brochures;
- 23.3 Contact information for Gambling Helpline is on all EGMs, Screens, all gaming tables, reverse side of membership card; and
- 23.4 Messaging on Dunedin Casino advertisements and promotional material.

Host responsibility procedures

- 24 Section 309A of the Act requires a casino operator, or person acting on its behalf, to take all reasonable steps to assist anyone who, it has reasonable ground to believe is a problem gambler.
- 25 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 gambling harm information and determine whether the customer is OK with their gambling.
- 26 Subsequent interventions or strong gambling harm indicators result in an intervention made by a Senior Host Responsibility Manager.
- 27 A decision may then be made to classify the individual as a Gambler of Interest, which involves increased monitoring and regular reviews. In more serious cases, this may lead to self-exclusion or casino exclusion.
- 28 Responsible gaming interventions with problem gamblers are conducted by members of senior management who have experience in dealing with such situations. An intervention can be triggered in a number of ways, including:
 - 28.1 A written report by staff recording observations of customer behaviour;
 - 28.2 Verbal communication from staff to a manager on incidents which require immediate intervention;
 - 28.3 Host responsibility account and transaction monitoring reports which indicate an intervention is required;
 - 28.4 Calls and information received from third parties;
 - 28.5 Holistic analysis of an individual customer over a period of time;
 - 28.6 AML Compliance Officer referral from transaction monitoring; and

28.7 As a result of any matter raised at the monthly host responsibility team meeting

Exclusion and re-entry

- 29 Our exclusion policy is contained in clause 2.1.1 of the HRP and the conditions of re-entry are set out in Host Responsibility Standard Operating Procedures.
- 30 All exclusions are set for a period deemed appropriate for the individual, up to a maximum of two years. Excluded persons are provided with information about local support services and the process for re-entry.
- 31 Customers who are excluded are prevented from entering the casino premises. A customer who breaches their 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.
- 32 Customers are not automatically allowed to re-enter the casino once their exclusion period ends. To regain entry, specific re-entry conditions must be met.
- 33 All customers seeking re-entry must apply and attend a meeting with a Host Responsibility Manager. During this meeting, we discuss the customer's gambling behaviour prior to exclusion, whether they have been gambling elsewhere, and any changes in their circumstances that demonstrate a more positive life balance concerning their gambling behaviour and views.
- 34 Customers whose exclusion term is for more than six months are required to provide evidence that they have sought the assistance of a suitably qualified problem gambling counsellor.
- 35 In all situations where the customer is granted re-entry, they are placed on a casino enforced gambling limitation, must sign up to be a loyalty member and use the membership card while playing at the casino (in order for their gambling activity to be better monitored), and are classified as a Gambler of Interest for six months.
- 36 As at 28 August 2024, DCL have 239 people with current exclusions from the casino, and 26 people are being monitored as a Gambler of Interest.

The role of technology in host responsibility

- 37 DCL has invested significantly in technology to assist in enforcing its HRP and to ensure customers who are excluded are not permitted onsite.

- 38 DCL works with Torutek, a New Zealand based company who specialise in facial recognition software to provide the casino with facial recognition software called Guardian.
- 39 Facial recognition was fully implemented and operational in May 2022. The technology was introduced to assist with the detection of persons who should not be on our premises, and to assist with our Host Responsibility obligations.
- 40 We manually gather information from various touchpoints, including player tracking systems, transaction records, and customer interactions. This data is then meticulously cross-referenced to identify patterns that may indicate potential harm or risk, allowing us to proactively engage with customers in need of support. Despite this process having some practical limitations, it reflects our commitment to meeting Host Responsibility requirements and protecting our patrons.
- 41 DCL continues to develop and enhance its host responsibility technology. Recently, DCL contracted a third party to build a custom host responsibility transaction monitoring program. This program tracks time on-site, money spent, average daily turnover, and win/loss. It is envisaged that future enhancements to this technology will include monitoring for material changes over specific timeframes and generating alerts for staff.
- 42 DCL has also recently contracted a third party to install additional Host Responsibility facial recognition and transaction monitoring within the ATMs, Eftpos and Cash Redemption Terminals across the Grand Casino site.

Membership and Agreed Gambling Limitations

- 43 DCL is able to monitor an individual's gaming activity through the use of the membership cards for Grand Rewards members. The information gathered as a result is then used by various other programmes to which DCL subscribes.
- 44 Grand Casino has an Agreed Gambling Limitation system which allows customers to set limits on how much they spend, lose or turnover and how long they gamble for. Agreed Gambling Limitation is a harm minimisation initiative available to all Grand Rewards members. Agreed Gambling Limitations can also be imposed on certain customers by the casino, if deemed appropriate as a harm minimisation tool.
- 45 Once the 100% threshold is reached, a senior casino staff member will investigate the situation and will ask the player to leave. While the membership card remains active, the system will no longer award loyalty points, and the player will be excluded from promotional draws.

Training staff in Host Responsibility

- 46 All staff, regardless of their position at the casino must attend a two-hour Host Responsibility and Responsible Service of Alcohol training within three months of employment with the Host Responsibility Manager. Topics covered by this training include:
- 46.1 Responsible service of gambling and alcohol;
 - 46.2 Identification of gambling harm;
 - 46.3 Reporting and recording procedures of observations; and
 - 46.4 Harm minimisation tools including Agreed Gambling Limitations.
- 47 All front-line staff are required to undertake further training within six months of employment. Topics covered by this training include:
- 47.1 Initial action with customer requesting problem gambling assistance;
 - 47.2 Advanced service of alcohol;
 - 47.3 How to undertake an interaction or interventions with customers;
 - 47.4 Awareness of employee gambling-related harm; and
 - 47.5 Interventions, de-escalation and motivational interviewing.
- 48 Grand Casino undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement such as staff knowledge recall, staff training feedback and continuous on-the-job training.
- 49 Recently, DCL has undertaken the annual one-hour refresher on host responsibility, this was delivered by the Host Responsibility Manager. This particular training included covering a number of changes from the recently approved HRP.
- 50 While there is a current dedicated team that is fully trained in host responsibility, it is very much a team effort across the casino to report any signs of gambling harm.
- 51 Special training is required for Authorised Persons named in the HRP who undertake exclusions and more advanced interventions with customers.
- 52 All front-line staff are trained to report gambling harm indicators. Grand Casino employees are required to submit a written report

using the reporting system available on multiple computers across the gaming floor. Upon submission, the Host Responsibility Shift Manager will review, investigate, and take appropriate action.

- 53 All front-line employees involved in the service of alcohol, monitoring and resolution of incidents involving the sale and supply of alcohol attend a Responsible Service of Alcohol training undertaken by a Host Responsibility Shift Manager.

AUDITING AND COMPLIANCE

The Gambling Commission

- 54 DCL is required to make detailed annual reports to the Gambling Commission on various measures and indicators, including:
- 54.1 the total number of observations of Casino patrons who have been observed showing one or more signs of problem gambling behaviour;
 - 54.2 the number of individual Casino patrons in the Host Responsibility Incident Reporting Management system;
 - 54.3 the number of active 'Gamblers of Interest'; and
 - 54.4 the number of individuals excluded by the Casino.
- 55 DCL have created and implemented a Host Responsibility Assurance Programme which is conducted regularly to ensure compliance with current internal policy, procedures, and legal requirements, and to test the ongoing effectiveness and adequacy of the HRP.
- 56 Since 2016, the number of customers the host responsibility team has interacted with has increased significantly. I do not consider this is necessarily because the number of problem gamblers has increased, rather, it demonstrates that DCL's procedures and systems have significantly improved in successfully identifying and assisting customers in need

The Department of Internal Affairs

- 57 The Casino reports monthly to the DIA on matters relating to harm minimisation under the Act, including information relating to:
- 57.1 under-age gambling;
 - 57.2 unattended children in the car park;
 - 57.3 begging;
 - 57.4 cheating and use of counterfeit chips or notes inside the casino;

- 57.5 money laundering; and
- 57.6 loan sharking.
- 58 In addition, DIA inspectors receive information about incidents from the casino through either:
 - 58.1 daily reports at the end of each day which the inspectors review and analyse; and
 - 58.2 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).
- 59 The DIA has conducted three 'Mystery Shopper' exercises at the Grand Casino. DCL has also, in 2022, independently contracted Mystery Shoppers to undertake visits in order to provide information on host responsibility practices and improvements that could be made to these.

CONCLUSION

- 60 In summary, as the Compliance Manager I am pleased of the host responsibility initiatives DCL has implemented. DCL continually strives to explore new ways to improve its host responsibility at the Grand Casino.
- 61 The Grand Casino offers a very safe environment in which our customers can come and enjoy themselves responsibly.
- 62 Host responsibility has always been an integral part of our culture. It's a routine aspect of what we all do.

Dated: 5 September 2024

Stacey Murray