



CHRISTCHURCH
CASINO

PROBLEM GAMBLER IDENTIFICATION POLICY
CHRISTCHURCH CASINOS LIMITED

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Introduction

<i>Approval</i>	Effective date:	1 July, 2009
	Revised date:	1 July, 2011

Brett Anderson
Chief Executive Officer

Introduction The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Gambling Act 2003 ("the Act") to enable Christchurch Casino to take all reasonable steps to identify actual or potential problem gamblers and to act on that information.

Gambling Act 2003 requirements The Gambling Act 2003, sections 308-310 requires the holder of a casino licence to:

- develop policy for identifying problem gamblers
- exclude problem gamblers identified under section 308
- exclude those who identify themselves as a problem gambler

Introduction, continued

Policy Statement

The Christchurch Casino Problem Gambler Identification Policy is designed to ensure customers enjoy an environment that is safe, responsible and regulated.

Objectives

The purpose of the Gambling Act 2003 is to:

- (a) *control the growth of gambling; and*
 - (b) *prevent and minimise the harm caused by gambling, including problem gambling; and*
 - (c) *authorise some gambling and prohibit the rest; and*
 - (d) *facilitate responsible gambling; and*
 - (e) *ensure the integrity and fairness of games; and*
 - (f) *limit opportunities for crime or dishonesty associated with gambling; and*
 - (g) *ensure that money from gambling benefits the community; and*
 - (h) *facilitate community involvement in decisions about the provision of gambling.*
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Definitions

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."
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Indicators of problem gambling

Introduction

Christchurch Casino has developed a list of visible signs and behaviours that may be indicators of gambling-related harm.

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

“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.

The nature and range of indicators may vary from one customer to the next. These indicators need to be assessed in the context of other information to develop an overall assessment of the customer's status and the urgency of their situation.

Indicators

Strong Indicators

- Requests to self-exclude;
- Self-disclosures that may or may not make reference to the person's gambling;
- Third-party disclosures that may or may not make reference to the person's gambling;
- Severe emotional distress due to gambling (for example, suicidal thoughts).

General indicators

- 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 (for example rushing when leaving machines or tables, missing appointments); staying after friends/family leave;
 - Emotional distress including agitation, mood swings, crying, holding head in hands, or out-of-character behaviour;
 - Personalising machines, including abuse of machines;
 - Irritated by interruptions to gambling;
 - Rudeness and complaints to employees or guest about gambling outcomes;
 - Possessiveness of particular machines or spots at tables (e.g., standing over other patrons, hovering, aggression);
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Indicators of problem gambling, continued

- Attempts to conceal gambling activities;
 - Steps taken to avoid monitoring of gambling activity;
 - Not celebrating wins;
 - Decline in physical appearance e.g. clothing or personal hygiene, over time;
 - Family/friends seeking out or enquiring about a customer;
 - Falling asleep at the machine or table;
 - Claims of malfunction of gaming machines or gaming errors;
 - High consumption of alcohol while gambling (for example, demanding drinks);
 - Interaction with undesirables;
 - Unattended children;
 - Previous breach-history of barrings or exclusion orders.
 - Leaving the casino to get additional money and coming back after having appeared to have run out of money;
 - Repeated ATM visits;
 - Declined eftpos and or credit card transactions;
 - Borrowing money including begging;
 - Not having sufficient money to exit car park;
 - Tray-surfing.
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Other Observations

The indicators listed above are not exclusive – Casino employees are encouraged to report changes in behaviour or anything which raises concern.

Reporting Observations

All employees are trained to recognise the signs of problem gambling and refer observations on to their Supervisor or Manager, who will act as required and report the observations and actions to Host Responsibility.

All observations by frontline staff must be reported to Host Responsibility.

Problem gambling assessment

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

Assessments Christchurch Casino undertakes an assessment based on observed indicators and any other information collated.

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

- Severity of presenting indicators;
- Uncharacteristic behaviour;
- Uncharacteristic changes in appearance;
- Changes in patterns of play; and
- The number of indicators and repetition over time.

The assessment is dynamic in nature as customers may move up and down a continuum of harm, but recognises that interventions should be provided when harm is present, suspected, or may occur in the near future. The indicators of harm along with other relevant information are weighed up and considered.

Reporting Observations All employees are trained to recognise the signs of problem gambling and refer observations on to their Supervisor or Manager, who will act as required and report the observations and actions to Host Responsibility. All observations by frontline staff must be reported to Host Responsibility.

Strong Indicators Direct disclosures by a customer would generally lead to categorisation of a customer as a problem gambler. Indirect disclosures of 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.

General Indicators The observation of a number of general indicators is sufficient to trigger further monitoring, but depending on the circumstances, may not necessarily lead to an assessment that the case is urgent and that the customer requires immediate assistance.

As part of a graduated response, it is expected that such people should be subject to further monitoring to determine whether any further general indicators emerge, including the repetition of the same indicators.

If there is an accumulation of general indicators over a period of time (e.g. several general indicators recur during a 1 month period) Christchurch Casino would have reasonable grounds to consider such people to be actual or potential problem gamblers.

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

Ongoing Assessments A Gambler of Interest (GOI) file will be opened if, after analysis of information, an assessment suggests the customer may be a potential problem gambler or have a potential gambling problem. This file will be used for ongoing collection of information about the customer.

Interventions

Introduction Depending on the perceived severity and urgency of a situation, Christchurch Casino will provide graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. Actions taken are proportionate with the level of risk and harm perceived.

Interactions Frontline staff members are trained to approach and offer assistance and information to customers if a supervisor/manager or Security is not immediately available and they believe the situation to be potentially urgent. The obligation to refer the incident on remains.

Front-line employees routinely interact with customers as part of standard customer service delivery. General staff interactions are consistent with a harm prevention approach and may include, but are not restricted to, the following:

- engaging with customers to assess their well-being
- addressing customer needs and taking appropriate action, eg encouraging a break in play.

Reporting Observations All employees are trained to recognise the signs of problem gambling and refer observations on to their Supervisor or Manager, who will act as required and report the observations and actions to Host Responsibility. All observations by frontline staff must be reported to Host Responsibility.

Interventions Christchurch Casino also undertakes interventions with customers. These are carried out by Host Responsibility or other appropriately trained staff. Shift Managers are trained to intervene if necessary, record the observations and actions taken, and refer the information on to Host Responsibility. These interventions may result in staff issuing host responsibility packs to customers who may be at risk of problem gambling. In the event that strong indicators of problem gambling are evident, interventions may result in customers being offered self-exclusion, or being issued with a Christchurch Casino /third party exclusion order.

Strong Indicators As discussed in the preceding section, where a strong indicator presents due to customer disclosure, there is considered to be a high probability the customer is, or is at risk of being, a problem gambler, immediate action is required. Employees must stay with the customer, and must escort the customer to Security or Host Responsibility to take further action. Security or Host Responsibility will offer information or advice including information on the self-exclusion procedure available. If the customer has requested self-exclusion, an exclusion order must be issued immediately in accordance with the Exclusion Standard Operating Procedure.

Interventions, continued

Third Party Process

As discussed in the preceding section, a third party may express concern about a customer. Employees should ask whether the concern is due to gambling problems, and engage Host Responsibility or Security where there is a positive response to this question. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via membership card use, if available or feasible) is undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. The action is logged and sent through to Host Responsibility, a Gambler of Interest (GOI) file is opened, and an investigation is undertaken.

A third party request that a customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and will be treated on an urgent basis. The third party is referred to Host Responsibility or Security. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via membership card use, if available or feasible) is undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time.

If requested to leave, Christchurch Casino shall also provide the customer with information about problem gambling, including exclusion options. The action is logged and sent through to Host Responsibility, and a Gambler of Interest (GOI) file is opened, and an investigation is undertaken.

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

Consequences of Identification

Once identified as a problem gambler, Christchurch Casino must:

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

Recording, collation and analysis of information

All information is recorded relating to observed indicators of harm, interactions and interventions in relation to a customer by frontline staff, supervisors and managers or by Host Responsibility.

GOI files

Christchurch Casino will regularly review active GOI files at a minimum, at the following intervals or more often as required:

- Fortnightly review for the duration of the investigation
- Formal 6 week review

When information becomes available or is obtained, a re-assessment will be undertaken. If an assessment is made that the customer is not a problem gambler after the 6 week review period, the GOI file is deactivated.

All deactivated GOI files will be retained by Christchurch Casino. A GOI file may be reactivated at any stage subsequent to the 6 week review period if further information or indicators in relation to a customer emerge. In this case, a reassessment will be undertaken, and monitoring will continue as part of the review process.

Review

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

Standard Operating Procedure – Exclusion Options from Christchurch Casino Premises

Introduction

Christchurch Casino exclusion options provide all our customers with the opportunity to take time away from the Casino.

These options are a proactive measure whereby employees can encourage customers who may or may not have a gambling problem to self exclude with varied re-entry conditions.

Essentially the 3 and 6 month self exclusion options are an early intervention or 'timeout' alternative enforceable under the Act. These options are a proactive measure and are not available where serious concerns are held about the persons well being.

In the event of a breach under the 3 and 6 month self exclusion the customer will be dealt with as per usual.

Gambling Act 2003 requirements

Under section 309 and 310 of the Act an exclusion order must be issued to:

- A problem gambler identified under section 308
 - Self-identified problem gambler
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Approach

Third Party or Casino Identified Exclusion

In every case where a customer is identified as a 'problem gambler' in accordance with the Problem Gambler Identification Policy, Christchurch Casino will:

- Give the customer the opportunity to self exclude from the Christchurch Casino premise; or
- issue a Casino exclusion for the maximum period of two years; and
- where possible issue an exclusion notice to the customer; and
- explain the consequences should a breach occur; and
- explain the re-entry process; and
- create a security incident report.

Breaches

Should a breach occur Christchurch Casino will:

- Issue a trespass notice to the excluded person; and
- immediately notify the Government Inspectors at the Department of Internal Affairs; and
- create a security incident report.

Re-entry criteria

1. No breaches 12 month prior to re-entry
2. Conduct a interview with Christchurch Casino Management
3. Evidence that counselling has being completed

Self Identified Exclusion

In every case where a customer approaches a Christchurch Casino employee to initiate an exclusion, Christchurch Casino will make available the following options:

- 3 months – part 1 & 2 of the re-entry criteria applies
- 6 months – part 1 & 2 of the re-entry criteria applies
- 12 months – full re-entry criteria applies

Breaches

Should a breach occur Christchurch Casino will:

- Issue a trespass notice to the excluded person; and
- immediately notify the Government Inspectors at the Department of Internal Affairs; and
- create a security incident report.

Re-entry criteria

1. No breaches 12 month prior to re-entry
 2. Conduct a interview with Christchurch Casino Management
 3. Evidence that counselling has being completed
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SELF EXCLUSION OPTIONS

CHRISTCHURCH CASINOS LIMITED

EXCLUSION PERIOD	CONSIDERATIONS	RE-ENTRY CONDITIONS			6 WEEK MONITORING
		No breaches of exclusion 12 months prior to the application to re-enter	Re-entry interview to be conducted with Christchurch Casino Management	Evidence that counselling with a problem gambling counsellor has been completed	
3 MONTH	Only available as a proactive measure to manage a person's gambling, this option is not available if serious concerns are held i.e. a GOI file has been created, third party enquiry received or self disclosure of a gambling problem	✓	✓	-	✓
6 MONTH	Available as a proactive measure to manage a person's gambling, this option is not available if a third party enquiry has been received or disclosure of a gambling problem	✓	✓	-	✓
12 – 24 MONTHS	Available at the request of any person who requests exclusion from the Casino or when identified by the Casino and the person admits to problems occurring	✓	✓	✓	✓

IN REFERENCE TO SECTION 310, GAMBLING ACT 2003