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
- Gambling Limitation.

Section One – Definition of a problem gambler

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

"Harm" is defined as:

(a)   harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and

(b)   includes personal, social or economic harm suffered:
    (i)   by the person; or
    (ii)   the person's spouse, partner, family, whanau, or wider community; or
    (iii)   in the workplace; or
    (iv)   by society at large.

Section Two - Indicators of problem gambling

Introduction

Christchurch Casino uses a number of indicators to assess whether a customer is likely to be a problem gambler. Although these indicators provide an appropriate basis for making determinations as to whether someone is a problem gambler, the nature and range of indicators may vary from one customer to the next. Wherever possible, indicator information should be interpreted in the context of other relevant information to develop an overall assessment of the customer's 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
- Customers whose gambling data (accessed through customer loyalty accounts) is assessed by the Focal algorithm and by the HR Team as being high risk.
- High visitation frequency combined with 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.
-   Failure to settle credit arrangements as agreed, including redemption of cheques and markers when due

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;
-   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 TITO tickets 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 I-Trak.

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 I-Trak 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 I-Trak 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 I-Trak 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 I-Trak 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).

Third party disclosures range from someone seeking general information about a customer, through to a request that a customer at the casino be removed immediately because of concerns about the customer's gambling. Third party disclosures that may or may not make reference to a person's gambling is a strong indicator of harm and will be referred immediately to a Shift Manager or Host Responsibility and treated on an urgent basis.

In all cases where a third party appears to express a 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 I-Trak and made available to Host Responsibility. Details must be taken, including contact details and a summary of concerns. As a first step, 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 with the customer will be undertaken. If appropriate the customer may be requested to leave the premises for a period of time to allow further investigations to be made. If requested to leave, Christchurch Casino will also provide to the customer problem gambling information, including Exclusion options. The action must be logged into I-Trak and made available to Host Responsibility as soon as practicable to allow an investigation of the concerns to be completed.

If the individual is not found, or not immediately requested to leave or issued with an exclusion order, a GOI file will be opened and they will be subject to ongoing monitoring.

All third party information should be corroborated as part of an internal investigation. The Information Collection and Collation and the Analysis an Intervention SOPs outline 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 Incident Reporting and Risk Management System 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 Incident Reporting and Risk Management System 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 an I-Trak file, which may be 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 harm[1];
(c)   issue an Exclusion Order immediately if requested to do so by the customer[2]; 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 customer[3].

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[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 I-Trak.

Host Responsibility uses I-Trak 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 and when the individual of concern is not immediately Excluded or formally requested to leave;
- when required by the terms of any approved circumstances for providing credit; or
- a customer returns from Exclusion having fulfilled the 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.