

 Policy for Identifying Problem Gamblers	Date: Mar 2024
	Revision No. 1.0
	Initials - KM
	Signature

1.0 Purpose

This document includes a policy for identifying problem gamblers and a venue statement on how the venue proposes to minimise the risk of problem and underage gambling at the venue.

Grassroots Trust Central Limited (GTCL) operates a comprehensive policy to supervise, monitor and identify Problem Gamblers at all venues licensed to GTCL. The purpose of the policy is to ensure that the general public, DIA, and venues, have confidence in GTCL; that information is communicated as efficiently and effectively as possible; and harm caused through Class 4 Gambling is minimised.

This policy supports our venues to provide best practice gambling host responsibility for their customers and it is expected that Venue Management will support their staff in providing host responsibility. GTCL is committed to working with Venue Personnel to provide ongoing education and support in their role as responsible gambling hosts.

This policy meets the requirements of the Gambling Act 2003 and Gambling (Harm Prevention & Minimisation) Amendment Regulations 2023.

2.0 Revision History

Date	Revision No.	
New Document	1.0	New Policy

3.0 People/Areas Affected

- The Board of Directors
- All employees working for or on behalf of GTCL
- Venues
- Department of Internal Affairs
- Community & Gambling Customers

4.0 Policy for Identifying Problem Gamblers

4.1 Problem Gambler

A problem gambler is a person whose gambling causes harm or may cause harm.

Harm –

- a. means 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.

4.2 Problem Gambling

For many people gambling is a form of entertainment and poses no problem, however, we acknowledge that some people will experience harm as a result of their gambling. Problem gambling can be described as occasional or regular gambling to the extent that it leads to problems in other areas of life, particularly with finances and inter-personal relationships. These problems range from minor ones; involving for example, arguments with the family over gambling expenditure, to problems involving a compulsive addiction to gambling resulting in major financial or inter-personal difficulties.

4.3 Training

4.3.1 The Venue Manager and Venue Personnel who supervise gambling in the course of their duties participate in training to keep up to date with procedures for identifying problem gamblers and the problem gambler intervention process.

4.3.2 Problem Gambling Awareness Training is provided by GTCL or the Trust's representative. Problem Gambling Awareness Training must be provided to the Venue Manager and Venue Personnel before they first start supervising gambling in the course of their duties at the venue (induction training is required for new staff).

4.3.3 Problem Gambling Awareness Training must be provided at least once a year.

4.3.4 A person who has received Problem Gambling Awareness Training must be present at the venue at all times when gambling activities are available to players.

4.3.5 Problem Gambling Awareness Training must enable the Venue Manager and Venue Personnel to:

- a. Approach a player whom the Venue Manager or Venue Personnel have reasonable grounds to believe may be experiencing difficulties relating to gambling; and
- b. Provide information to a player about the characteristics of problem gambling (including recognised signs of problem gambling); and
- c. Provide information to a player about the potential dangers of problem gambling; and
- d. Provide information to a player about how to access problem gambling services; and
- e. Remind a player that the Venue Manager or a person acting on the Venue Manager's behalf may identify a person they have reasonable grounds to believe is a problem gambler and exclude the player from the gambling area of the venue for up to two years; and
- f. Remind a player that they can identify themselves as a problem gambler and request that the Venue Manager or a person acting on the Venue Manager's behalf exclude them from the gambling area of the venue for up to two years; and
- g. Monitor for signs of harm, including through conducting Gambling Area Sweeps.

4.3.6 Problem Gambling Awareness Training must also:

- a. Include practical and interactive sessions on:
 - i. Interacting with players to gain familiarity and build rapport with them;
 - ii. Initiating conversations with a player who may be experiencing harm;
 - iii. How to interact with a player who is distressed or agitated; and
 - iv. How Venue Personnel can support problem gamblers through the exclusion process, including how to start conversations with players about the exclusion process and how players can access a multivenue exclusion.

- 4.3.7 Problem Gambling Awareness Training must include the following information:
- a. Information about identifying the signs of harm;
 - b. Basic information about how gaming machines work, including why they can be addictive;
 - c. First-hand accounts (which may be pre-recorded) from people who have experienced or been affected by harm;
 - d. Information about the types of harm;
 - e. Information about local and national problem gambling services and other organisations that can provide support to people affected by harm;
 - f. Information about what resources are available to support Venue Managers or Venue Personnel to help prevent and minimise harm; and
 - g. The procedure for self-exclusion and venue-initiated exclusion, including when it is appropriate for the Venue Manager or a person acting on their behalf to consider excluding an individual.
- 4.3.8 Problem Gambling Awareness Training must provide guidance on the following matters;
- a. How to maintain records to ensure that information is retained so that actual or potential problem gamblers can be identified, and obligations under the Privacy Act 2020 can be complied with; and
 - b. How to conduct Gambling Area Sweeps.

5.0 Venue Statement on How the Venue Proposes to Minimise the Risk of Problem & Underage Gambling at the Venue

5.1 Problem Gambling Prevention

- 5.1.1 Brochures and notices are clearly displayed in the gaming area to inform players about the hazards of gambling, encourage players not to spend more than they can afford and set out information on assistance for gambling problems. The brochures include information about the odds of winning, such as “You might sometimes have a win but, if you keep playing, you are likely to lose all the money you put in”. The brochures also include information on the characteristics of problem gambling (including the recognised signs of problem gambling). The notices include a statement that the venue has a problem gambling policy and that a copy of the policy will be made available on request.
- 5.1.2 The gaming machines operated do not have banknote acceptors that accept notes higher than \$20.00 in denomination.
- 5.1.3 The time (clock) is located on each gaming machine screen.
- 5.1.4 Credit is not provided by the venue for the purpose of gambling.
- 5.1.5 Venue Personnel will prevent customers showing signs of intoxication from playing the gaming machines and will request they leave the premises if necessary.
- 5.1.6 No syndicate play is permitted.
- 5.1.7 Automatic Teller Machines available in the venue must be in the line of sight of staff at the main bar area of the venue or, if the venue does not have a bar area, the main customer service area of the venue.

- 5.1.8 If the Venue Licence has a defined gambling area, the gaming machines must not be visible from outside the venue (except intermittently when an external door is in use).
- 5.1.9 Ensure that no advertising or promotions relating to a gaming machine jackpot at the venue is published inside the venue in a way that it is visible or audible from outside the venue, or be published outside the venue.

5.2 Gambling Area Sweeps

- 5.2.1 The following 7 signs of gambling harm are identified as strong evidence-based indicators of gambling harm, can be easily identified by staff and reduce the need for subjective judgement:
 - a. Withdrawing or attempting to withdraw cash from an automatic teller machine (“ATM”) or EFTPOS device on two or more occasions in one day to use for gambling at the venue;
 - b. Gambling during 9 or more consecutive gambling area sweeps;
 - c. Attempting to borrow money from staff or other venue customers to use for gambling;
 - d. Leaving children in the car or otherwise unattended at the venue;
 - e. Waiting to gamble as soon as the venue opens;
 - f. Refusing to stop gambling at the venue when the venue is closing, or otherwise appearing unable to stop gambling;
 - g. Appearing visibly distressed or angry either during or after gambling (for example crying, holding their head in their hands, or hitting a machine).

The above list is not listed in order of importance. The list is also not exhaustive, and staff must also be monitoring for other signs of gambling harm. Some examples of other signs of gambling harm are:

- a. Complains to personnel about losing;
 - b. Has gambling rituals or superstitions (rubbing, talking to machine);
 - c. Goes out of their way to avoid being seen at the venue (including asking personnel to not let others know they are there);
 - d. Friends or family raise concerns about the gambler.
- 5.2.2 A gambling area sweep is defined as “the physical observation of a place where gaming machines are located to (a) observe player behaviour and (b) monitor for signs of gambling harm.
 - 5.2.3 Sweeps of the gambling area must be conducted at least three times per hour while the gambling area is operating, with each sweep being at least 10 minutes after the previous sweep.
 - 5.2.4 When conducting a sweep, the Venue Personnel must take all reasonable steps to identify whether any player has been gambling during nine or more consecutive sweeps. Taking all reasonable steps includes:
 - a. When a player is first observed during a sweep of the gambling area, Venue Personnel should note an identifying feature of the person in the sweep records. This could be their name or nickname or some other unique feature sufficient for staff to identify that person in subsequent gambling area sweeps. For example, a particular item of clothing may be noted.

- b. Only enough information to identify the player is required, as Venue Personnel only need to know if that person is present for 9 or more consecutive gambling area sweeps.
- c. At each sweep, Venue Personnel should note in the records whether the player is present.
- d. When a player has been noted as present for 9 consecutive gambling area sweeps, Venue Personnel must have a conversation with the player. The conversation, its outcome and other relevant information must be recorded.

5.2.5 When conducting a gambling area sweep, Venue Personnel must keep records of EFTPOS and ATM transactions where they see that customers go from withdrawing cash to the gambling area, or gaming machine. Where someone withdraws twice for gambling, and on every subsequent withdrawal, Venue personnel should have a conversation to determine if the gambling may be causing the player harm.

5.2.6 A sweep is not required if Venue Personnel can verify through other means (e.g., CCTV) that the gambling area is unoccupied by players.

5.3 Gambling Area Sweep Records

5.3.1 The following information must be recorded:

- a. The name or ID of Venue Personnel who conducted the sweep;
- b. The date and time that Venue Personnel conducted the sweep;
- c. How many players were present in the gambling area during the sweep;
- d. Evidence of the steps taken by Venue Personnel to monitor and identify whether players have been gambling during nine consecutive Gambling Area Sweeps in a row; and
- e. If a Gambling Area Sweep is not conducted because Venue Personnel could verify through other means that the gambling area was unoccupied by players, a record must be provided showing:
 - i. The method by which Venue Personnel verified that the gambling area was unoccupied by players; and
 - ii. The date and time that the Gambling Area Sweep was not conducted.

5.4 Conversation Requirement

5.4.1 After identifying that a player is exhibiting one or more of the signs of harm (including making two cash withdrawals), a conversation must be had with that player to assist with identifying whether the player is a problem gambler.

5.5 Records of Signs of Harm Identified

5.5.1 The Venue Manager must ensure that Venue Personnel consider whether any player is exhibiting any of the signs of harm.

5.5.2 The Venue Manager must ensure that Venue Personnel, after identifying that a player is exhibiting 1 or more sign of gambling harm, have a conversation with that player to assist with identifying whether the player is a problem gambler.

5.5.3 When a sign of harm is identified, the following information must be recorded:

- a. The name of Venue Personnel who identified the sign of harm;
- b. The date and time that Venue Personnel identified the sign of harm;

- c. Information that would help Venue Personnel to identify a player who displayed the sign of harm (for example, their name, if known, or a general description of their appearance);
- d. Which sign of harm was identified;
- e. The name of Venue Personnel who had the required conversation with the player;
- f. The date and time that Venue Personnel talked to the player;
- g. A summary of the conversation with the player; and
- h. Any further action taken in respect of the player.

5.5.4 The Venue Manager must review, or ensure that a person reviews on their behalf, the records for at least the previous seven days, at least once each week, to:

- a. Assess whether Venue Personnel have taken appropriate action following the identification of one or more signs of harm in a player;
- b. Assess whether further action is required in respect of a player; and
- c. Determine whether there are any players whom the Venue Manager, or the person acting on their behalf, has reasonable grounds to believe are problem gamblers.

5.5.5 The Venue Manager, or the person acting on their behalf, after reviewing the records, must record:

- a. The date of the review, and
- b. Any further action taken as a result of the review.

5.5.6 The Venue Operator must ensure that the information recorded is retained for a period of three years after the date on which it was recorded.

5.5.7 The record keeping process may be automated via the Person of Interest functionality in the QEC Terminal.

5.6 Approaching a Player

5.6.1 The Venue Manager, or person acting on their behalf, who has reasonable grounds to believe a player is a problem gambler, has obligations under the Gambling Act (section 309 and 310), to:

- a. Approach the person and provide information about problem gambling, including the self-exclusion process; and
 - i. May issue an exclusion order for up to two years, following the approach; or
 - ii. Must issue an exclusion order for up to two years if the player requests an exclusion order.

5.6.2 The above information or advice may be provided in written format and complemented by an oral discussion (if it is safe for Venue Personnel to do so). For example, the person could be provided with a problem gambling pamphlet and/or provided with a letter that sets out the dangers and characteristics of problem gambling, along with details on how to access the problem gambling services.

5.7 Exclusion Orders

5.7.1 Exclusion orders must be issued to self-identified problem gamblers. The exclusion order forms are kept at the main customer service area of the venue. An exclusion order can also be issued directly from the QEC screen via the Person of Interest tab.

- 5.7.2 In addition to the above, the Venue Manager, or a person acting on behalf of the Venue Manager, may, after offering advice or information to a person who is an actual or potential problem gambler, issue an exclusion order to the person.
- 5.7.3 The Venue Manager, or person acting on behalf of the Venue Manager, has a duty to assist a gambler if ongoing concern exists. If a person is approached and provided with information or advice, the person will continue to be monitored by Venue Personnel. If the person's ongoing gambling or other behaviour is such that there are reasonable grounds to believe the person is a problem gambler, the person will be approached again and provided further information about problem gambling and, if appropriate, issued with an exclusion order.
- 5.7.4 Only the Venue Manager or person acting on behalf of the Venue Manager may issue exclusion orders. However, if a person requests to be excluded, the self-exclusion request should be actioned immediately by the most senior member of staff at the venue, if the Venue Manager is not immediately available. The Venue Manager gives their authorisation for self-exclusion requests to be actioned by other Venue Personnel.
- 5.7.5 Unless the Venue Manager has good reason to issue an exclusion order for a lesser period, the exclusion period specified in the order will be a minimum of three months. Once issued, the exclusion order cannot be revoked, rescinded, or withdrawn.
- 5.7.6 The Venue Manager, or person acting on behalf of the Venue Manager, may refuse to issue an exclusion order if the person requesting the exclusion order fails or refuses to comply with a request to:
- a. Provide the person's name and date of birth; and
 - b. Either provide a recent photograph of the person or consent to a photograph being taken.
- 5.7.7 Venue Personnel must monitor and remove excluded persons who attempt to re-enter the gambling area (where it is safe to do so). Venue Personnel will regularly review venue records of exclusion order photos and take all reasonable steps to monitor for excluded persons during gambling area sweeps. Failure to remove an excluded person is a criminal offence punishable by a fine of up to \$5,000.00.
- 5.7.8 If Venue Personnel suspect a patron is an excluded person, Venue Personnel must approach the patron and request photo identification to verify identity. If the person refuses the request then Venue personnel must ask the person to leave the gambling area or venue (if necessary).
- 5.7.9 Records of all current exclusion orders, with the information required by the Act (Section 312A), must be kept.

5.8 Multi-Venue Exclusion Order Requests

- 5.8.1 When a multi-venue exclusion order request is received (an MVE request), the Venue Manager, or person authorised by the Venue Manager, should immediately:
- a. Complete an exclusion order (the MVE request is not itself an exclusion order);
 - b. Return the exclusion order to the MVE Coordinator;
 - c. Advise the staff of the new exclusion; and
 - d. Forward a copy of the exclusion order to GTCL.

5.8.2 This MVE process may be automated via the Person of Interest functionality in the QEC Terminal.

5.9 Minimising Risk of Underage Gambling

5.9.1 All gaming machines are located in a separate, defined area.

5.9.2 The gaming area is under frequent supervision by Venue Personnel. When there are no players in the gaming room, Venue Personnel will endeavour to go into the gambling area no less than two times per working hour to check whether anyone under 18 is playing a gaming machine.

5.9.3 The gaming area has a sign advising that it is an offence for persons under 18 years of age to play gaming machines.

5.9.4 Any individual who looks 21 years of age or under, enters the gambling area will be requested by Venue Personnel to show photo identification to verify their age.

5.9.5 Any person who fails or refuses to provide photo identification will be asked to leave the gaming area and not re-enter the gaming area. The photo identification must be one of the following:

- a. Valid, current Passport; or
- b. New Zealand Photo Driver's Licence; or
- c. Kiwi Access Card; or
- d. Hospitality NZ 18+ Card.

5.9.6 Money won by a player (prize money) will not be paid to any person who looks under 21 years of age and refuses to produce photo identification confirming that they are 18 years of age or older. This money will be held along with details of the individual's name, address, and the date the money was won. The money won will be held for seven days and paid to the individual if photo identification is provided confirming that the individual is 18 years of age or older. If suitable identification is not provided within seven days, then the funds will be banked as Gaming Machine Profit.

All venues must comply with this policy. A breach of this policy by the Venue Operator or Venue Manager is a serious, material breach of the Class 4 Venue Agreement.

This policy will be reviewed every two years unless required earlier due to changes in regulations and/or the Trust's processes to ensure best practice Gambling Host Responsibility.