

**HARM PREVENTION
AND MINIMISATION
POLICY (2016)**



INTRODUCTION

For over 500,000 New Zealanders every year, pub based gaming machines provide a harmless and enjoyable form of entertainment and leisure activity within the hospitality industry. However, it is acknowledged that some individuals or those associated with them may experience adverse consequences from their gambling, including the risk of developing addictive gambling behaviour.

It is the objective of Pub Charity Limited and its operators to ensure players are informed of the risks and their responsibilities to ensure they are “OK to play”. This includes playing for entertainment only, setting limits, taking a break and knowing the signs of problem gambling.

The purpose of the policy is to outline the responsibilities and measures employed by Pub Charity Limited and their venue operators to address these potential risks and prevent and minimise harm from gambling, including problem gambling.

POLICY OBJECTIVE

That Pub Charity Limited and their Venue Operators provide a safe, responsible gaming environment where staff take proactive steps to ensure the potential for harm is minimised or prevented and customers can make informed decisions about their participation in gaming activities.

All staff members involved with gaming will be adequately trained to be competent and confident to monitor, interact, observe, record, intervene, assess, inform and exclude players as required in response to concerns about their gambling behaviour.

Section 3 of the **Gambling Act 2003** states;

‘Problem Gambler means a person whose gambling causes harm or may cause harm’

The **Canadian Problem Gambling Severity Index (CPGSI)**, a series of specific interview questions used in New Zealand to assess the nature of peoples gambling behaviour, describes five gambler sub types;

	Non gambler	Not gambled at all in the last 12 months
	Non problem gambler	Not experiencing any adverse consequences from their gambling
	Low risk gambler	Not likely to be experiencing any adverse consequences from gambling
	Moderate risk gambler	May or may not be experiencing adverse consequences from gambling
	Problem gambler	Experiencing adverse consequences from gambling

PLAYER BEHAVIOUR

Gambling behaviour is as varied as any human activity. Determining from observation alone whether a person is experiencing adverse consequences from their gambling, and even more so when others are being affected, can be difficult.

Warning signs may or may not indicate a problem if only one or two factors are observed in isolation, but can become indicative when a greater number of signs are observed together or across time.

 <p>No (low) risk</p>	<p>Signs of No Risk behaviour can include;</p> <ul style="list-style-type: none">• Calm and enjoying play• Irregular player/social play• Limited playing time• Few if any EFTPOS withdrawals (no declines)
 <p>At risk</p>	<p>Signs of At Risk behaviour, that is indications a person who may be experiencing adverse consequences from their gambling, can include;</p> <ul style="list-style-type: none">• Waiting for a venue to open or being last to leave• Frequent attendance in the gaming area• Long sessions of play (playing for extended periods)• Frequent EFTPOS transactions• Declined EFTPOS transactions• Frequent visits to an ATM• Attempts to cash cheques• Appearing distressed• Mood swings• Being argumentative while gambling
 <p>High risk</p>	<p>Signs of Problem Gambling behaviour, where a person or their family is experiencing negative consequences from their gambling, can include;</p> <ul style="list-style-type: none">• Abusive behaviour• Causing damage to machines• Prioritising gambling above family, friends, employment, self (hygiene)• Leaving children alone while gambling• Begging for money to continue gambling• Disorderly behaviour linked to gambling• Requests for credit to continue gambling• Attempts to borrow money to continue gambling
<p>Other evidence of Problem Gambling can include;</p> <ul style="list-style-type: none">• Admissions or self-disclosure by the individual that he/she is a problem gambler and has suffered harm or that his/her gambling has caused “others” harm. Such disclosure may be a full disclosure, a partial disclosure or a veiled disclosure; for example “I don’t know how I will pay this week’s rent”.• Evidence (documented and verified) supplied by a family member or significant other that harm has been caused by the person’s gambling.• Any evidence of harm brought to the attention of the venue manager or other venue staff.	

PUB CHARITY LIMITED RESOURCES – THE “OK TO PLAY?” PROGRAM

All gamblers have the potential for their behaviour or circumstances to deteriorate from no/low risk to moderate risk and potentially to problem gambling.

To enable venues to operate as responsible gaming hosts Pub Charity Limited provides resources to venue staff in regard to their roles and responsibilities to create a safe and supervised environment with the aim to prevent and minimise harm.

The key messages of “OK to Play?” reinforce responsible player behaviour and staff management of players in the gaming environment;

Resources provided to the venue include:

- 1) PCL Harm Prevention and Minimisation Policy
- 2) “OK to Play?” Resources including banner, coasters, Bar Mats and wobblers for player responsibility.
- 3) Health Promotion Agency (HPA) and “OK to Play?” Posters to support staff responsibility.
- 4) Harm Minimisation Reference Guide to help support and identify staff responsibilities.
- 5) “Is everything OK?” Which includes Anger/Time/Money (ATM).
- 6) Managing Player Behaviour Flow Chart



VENUE STAFF RESPONSIBILITY

Monitoring Player Behaviour

The principles of good Host Responsibility requires venue Staff to monitor the well-being of all those on the premises including those who are gambling. Staff are required to respond appropriately to signs of problem gambling.

Venue staff are trained to;

<p>Monitor</p>	<p>Staff must be aware of all persons entering the gaming area, firstly to ensure minors and excluded persons are not attempting to access class 4 gambling or can be intercepted before they do.</p> <p>Staff should be aware of the approximate time the person entered, the duration of their play, the intensity of their gambling and note any requests for cash withdrawals and the outcome.</p> <p>Staff should also be aware of any additional circumstances that may assist in determining the person’s state of well-being like their emotional state.</p> <p>These obligations to monitor the player are easily remembered using the prompt;</p> <div style="display: flex; justify-content: center; gap: 10px;"> <div style="text-align: center;">  A <small>ANGER</small> </div> <div style="text-align: center;">  T <small>TIME</small> </div> <div style="text-align: center;">  M <small>MONEY</small> </div> </div>
<p>Interaction</p>	<p>Staff should take the time to greet each player as they enter the gaming room. It is really important that you get to know your players and establish a rapport with them by having regular communication with them. This interaction permits an initial assessment of a person’s well being or state of mind.</p> <p>To interact, staff should make frequent visits to the gaming room, and take every opportunity to chat with players – particularly if they are new.</p>
<p>Observation/ Record</p>	<p>By Staff getting to know their players they will know their normal gambling habits and can pay particular attention if their gambling pattern changes. Whilst monitoring players if staff note any changes in behaviour or behaviours that may be a sign of problem gambling deliberate observation is now required. Isolated behaviours causing concern should be recorded by staff in the Observation/Incident Register and observations should continue.</p> <p>It is important for staff to look through the register each time they start their shift as it will bring them up to speed with any events that have occurred whilst off duty and assists with building a picture in regard to a player’s behaviour over time.</p>

Initial Intervention	<p>Where staff reach a point where they consider that the behaviour observed may be a sign/s of problem gambling some form of intervention is required. The initial intervention is for the purposes of assessing the player's wellbeing, 'Is everything OK?'. This approach is designed to be non-judgmental or non-confrontational.</p> <p>Where some concerns remain over the player's behaviour following the initial intervention the player should be provided with initial information about gambling including the Gambling Helpline number.</p>
Subsequent Intervention – Specific question about their gambling	<p>If the initial intervention raises more serious concerns, or the player is subsequently observed showing further signs of potential problem gambling behaviour, specific questions should be asked about their gambling to determine whether the player is gambling safely and in control.</p> <p>Based on the responses to these specific questions the staff member may decide to provide more detailed information about problem gambling.</p>
Inform	<p>Information obtained during the intervention stage may result in the staff member believing on reasonable grounds that the person is a problem gambler; that is that their gambling is causing them or others to experience adverse consequences. A Manager initiated exclusion notice should then be issued along with information on seeking help for problem gambling.</p> <p>Any obvious problem gambling behaviours or disorder requiring immediate intervention should be acted upon and an Exclusion Order issued.</p>
Exclude	<p>Exclusion orders are part of a broader set of initiatives under the Act designed to ensure that gambling environments are safe, harm arising from gambling is prevented or minimised and that gambling providers facilitate responsible gambling environments for patrons. It is a practical means for managing problem gambling behaviour and should not be used as a disciplinary tool.</p> <p>Staff maybe approached by a gambler who chooses to be excluded from one or more venues. This self-exclusion request must be acted upon by the staff member.</p>

VENUE RESOURCES AND PHYSICAL ENVIRONMENT

Pub Charity Limited will supply the venue with harm minimisation, prevention, brochures, posters, signs, notices and a compliance board. The venue must display these resources in the gaming area by law.



The material also advises the player about this policy and the odds of winning on a gaming machine, it encourages players to bet at a level they can afford, as well as detailing the signs of problem gambling and how to get help.

Staff will need to consider their own gaming room, they should maintain good line of sight from the working area of the bar to the main entrance to the gaming room so they can monitor players entering the room in order to detect and where possible prevent minors and excluded persons from accessing class 4 gambling.

PCL will also provide adequate CCTV coverage of the gaming room and entrances.

PUB CHARITY LIMITED TRAINING, RESOURCES AND SUPPORT

It is a legal requirement to have trained staff in harm prevention and minimisation whilst on duty at all Pub Charity Limited venues whenever gaming machines are in operation, with the overall responsibility being with the Venue Manager. Pub Charity Limited will provide training to all venue staff that are involved in gaming and will also complete regular refresher courses. It is important to advise when new staff come on board so training can be provided as soon as possible.

The training will include a presentation and will ensure all staff can meet the following requirements:

- A Approach a player that the manager or employee has reasonable grounds to believe may be experiencing difficulties relating to gambling:
- B Provide information to a player about the characteristics of problem gambling (including recognised signs of problem gambling):
- C Provide information to a player about the potential dangers of problem gambling:
- D Provide information to a player about how to access problem gambling services:
- E Remind a player that the Venue Manager or staff may identify a person has reasonable grounds to believe is a problem gambler and ban the player from the gaming area of the venue concerned for up to 2 years.
- F Remind a player that he or she can identify himself or herself as a problem gambler and request that the Venue Manager exclude the player from the gambling area for up to 2 years.

If you are in any doubt or have any concerns please contact your Pub Charity Limited Area Manager who will be happy to assist you. They will also review your Incident/Observation Register on their visits and talk through any concerns you may have. You will also be able to find additional resources in your Gaming Bar Book.

UNDER AGE GAMBLERS

Persons participating in gaming must be at least 18 years old.

Every person under the age of 18 commits an offence and is liable to summary conviction to a fine not exceeding \$500.00 if they participate in gambling at a Pub Charity Limited venue. Every Corporate Society that allows a person under the age of 18 to participate in gambling commits an offence and is liable on summary conviction to a fine not exceeding \$5,000.00. Every Venue Manager or key person employed at a Pub Charity Limited venue who allows a person under the age of 18 to participate in gambling commits an offence and is liable on summary conviction to a fine not exceeding \$1,000.00.

Evidence of Age

Patrons should not be offended if asked for evidence of age documentation. There are three evidence of age documents that are acceptable:

- Valid passport
- New Zealand (photo) Drivers Licence
- HANZ 18+ Card.

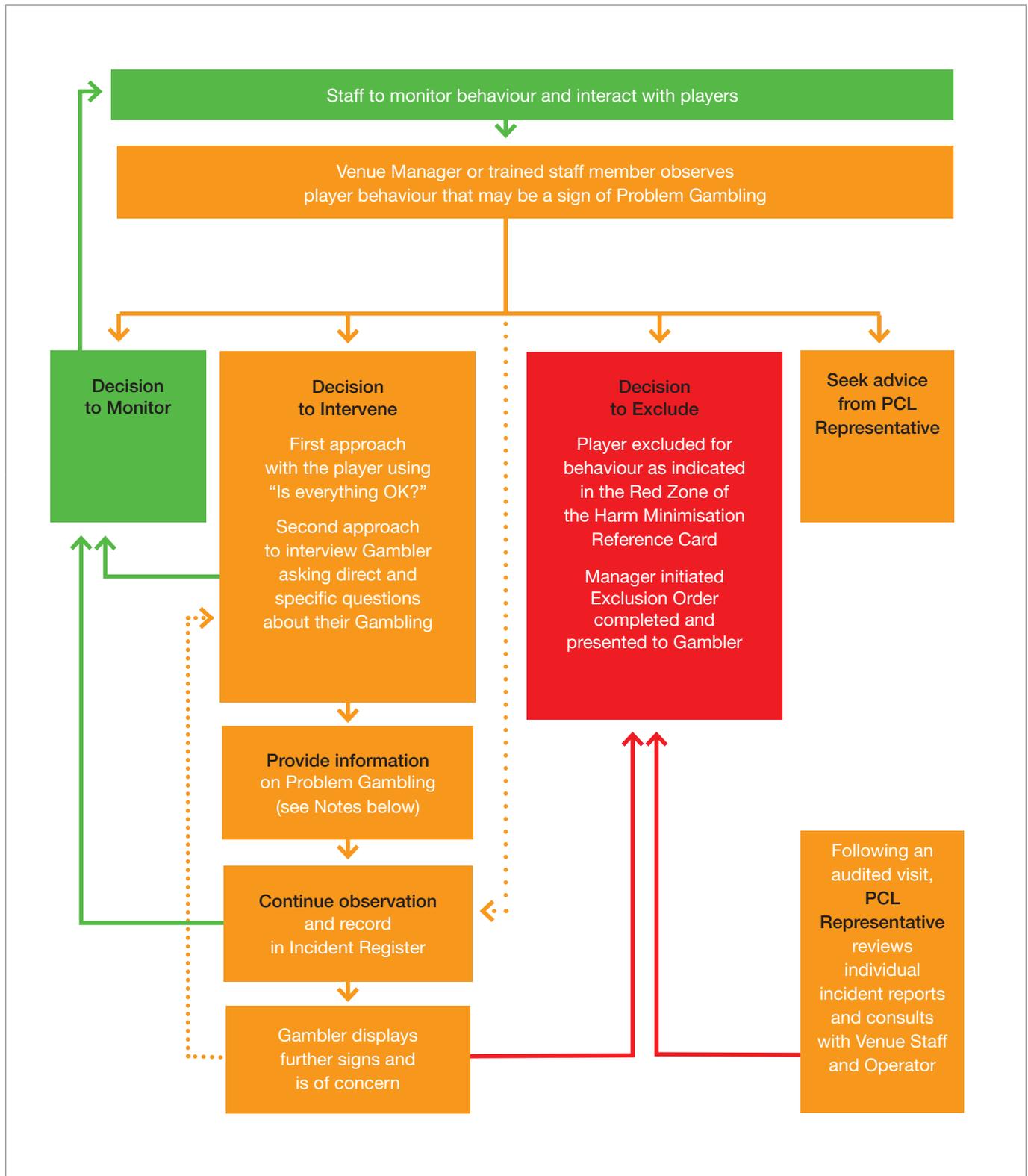
If venue staff at any Pub Charity Limited venue has reasonable grounds to suspect that a person is under the age of 18, they will refuse to pay out any money won by that person. Under age gambling may indicate a potential problem gambling issue.

TREATMENT PROVIDERS

There are problem gambling services in most areas in New Zealand. For free help, contact:

 <ul style="list-style-type: none">• Problem Gambling Helpline – 0800 654 655• Māori Gambling Helpline – 0800 654 656• Vai Lelei Pasifika Helpline – 0800 654 657• Youth Gambling Helpline – 0800 654 659• Ministry of Health – 0800 611 116• Woodlands Trust – 0800 333 122• Problem Gambling Foundation – 0800 664 262• Salvation Army Helpline – 0800 530 000	 <ul style="list-style-type: none">• Problem Gambling Services – www.gamblinghelpline.co.nz• Problem Gambling Foundation – www.pgf.nz• Ministry of Health – www.choicenotchance.org.nz• Woodlands Trust – www.woodlandstrust.org.nz• The Salvation Army – www.salvationarmy.org.nz
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MANAGING PLAYER BEHAVIOUR



Notes:

Option A – “OK to Play?” Money Clip Card

Option B – PCL Problem Gambling Wallet Card

At any time you require assistance or support please contact your Pub Charity Limited Representative.

HARM MINIMISATION REFERENCE GRID

	Player Behaviour	Staff Response	Purpose for Action	Tools
 No (low) risk	<ul style="list-style-type: none"> • Calm and enjoying play • Irregular player/ social play • Limited playing time • Few if any EFTPOS withdrawals (no declines) 	<div style="background-color: #4CAF50; color: white; padding: 5px; text-align: center; font-weight: bold;">Monitor</div> <ul style="list-style-type: none"> • Display “OK to Play?” messages • Regular monitoring and social interaction with no (low) risk persons in the gaming area 	<ul style="list-style-type: none"> • Establish a rapport • Enable an assessment of well being • Reinforce “OK to Play?” key messages 	<ul style="list-style-type: none"> • Gaming Room sweeps • “OK to Play?” resources
 At risk	<ul style="list-style-type: none"> • Negative behaviours linked to their gambling activity • Excessive anger/upset/ showing frustration over game outcomes • Grunting, groaning button bashing • Gambling for long periods (more than 3 hours) without taking a break • Seen gambling most days of the week • Multiple EFTPOS withdrawals and/ or declines • EFTPOS requests for small amounts 	<div style="background-color: #FF9800; color: white; padding: 5px; text-align: center; font-weight: bold;">Intervene</div> <ul style="list-style-type: none"> • Ask direct questions • Record observations and actions in incident register • Provide Harm Minimisation information • Escalate concerns to management or Risk Committee 	<ul style="list-style-type: none"> • Establish rapport • Assess wellbeing including emotional state and control in relation to gambling • Ask questions based on concerns about time and money spent or behaviour • Maintain record of behaviour • Advise of concerns and provide information on help options • Brief management with consideration of escalating to risk committee for action 	<ul style="list-style-type: none"> • Incident Register • Harm Minimisation Information
 High risk	<ul style="list-style-type: none"> • Violence and threats of violence towards others • Admission by player that they are a problem gambler or that their gambling is causing harm to others • Current Exclusion Order in place and attempting to enter gaming room • Any person escalated by staff and evaluated by an appointed risk committee as recommended to be excluded • Attempting to borrow money or begging to gamble • Asking for credit or attempting to sell items to continue gambling 	<div style="background-color: #F44336; color: white; padding: 5px; text-align: center; font-weight: bold;">Exclude</div> <ul style="list-style-type: none"> • Issue a Manager initiated Exclusion Order • Escalate to Manager and Risk Committee 	<ul style="list-style-type: none"> • Exclude person as required or instructed 	<ul style="list-style-type: none"> • Manager Initiated Exclusion Order

