

HARM PREVENTION AND MINIMISATION POLICY

2023



POLICY OBJECTIVE

Pub Charity Limited venues will provide a safe, responsible gaming environment for gaming customers where staff take proactive steps to ensure the potential for harm is minimised or prevented and customers accessing gaming at a PCL venue can make informed decisions about their participation.



All venue staff members involved with gaming will be adequately trained to be competent and confident in their understanding of the issue of problem gambling and their regulatory obligations to effectively respond as required through;

- **Monitoring and interacting** with customers;
- **Observating, recognising and assessing** potentially problematic gambling behaviour;
- **Recording** observations and incidents;
- Making timely and effective **interventions**;
- Providing **appropriate information**; and
- If required, managing the **Exclusion Process**.

Venue staff will liaise as required with senior venue management, the venue owner, corporate society staff, intervention service providers, and any other agencies necessary to achieve the best possible outcomes for players through the execution of the following policies and procedures.

From 1 December 2023 the signs of problem gambling include, but are not limited to, the following:

- 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;
- gambling during 9 or more consecutive gambling area sweeps;
- attempting to borrow money from staff or other venue customers to use for gambling;
- leaving children in a car or otherwise unattended at the venue;
- waiting to gamble as soon as the venue opens;
- refusing to stop gambling at the venue when the venue is closing, or otherwise appearing unable to stop gambling; and
- appearing visibly distressed or angry either during or after gambling (for example crying, holding their head in their hands, or hitting a machine).

PCL VENUE POLICIES

MONITORING PLAYER BEHAVIOUR

Player interaction and observation

Staff and management are committed to ensuring that gaming customers access gaming in their venues in a safe and responsible manner. Staff will take a pro-active role in establishing relationships with customers, both on entering the premises and throughout the time that they are in the gaming room. The purpose of this activity is to open a line of communication and establish a rapport with players that, along with ongoing monitoring and observation, will allow for an assessment of their well-being.

Gaming room management/room sweeps

Venue staff will undertake sufficient additional gaming room sweeps at least 3 times per hour and at least 10 minutes apart. Staff undertaking room sweeps will interact with players where possible for the purpose of establishing communication and rapport, and assessing the well-being of those in the room, including identifying signs of gambling harm and, if applicable, removing excluded persons and minors.

Staff should be noting durations of play, player gambling intensity, and players accessing cash from EFTPOS and ATMs (if applicable), while looking for any signs of emotional distress (A.T.M.), and intervening as required.

A record of all room sweeps must be maintained, including the time, date and staff member completing the sweep, the number of players in the room, and whether the sweep resulted in an Incident and Observation Report (IOR) being completed.

Continuous presence and continuous play

Staff will monitor duration of play of players in the gaming room, completing an IOR and intervening where continuous play or continuous presence exceeds 3 hours, or 9 room sweeps.

Where the period of play is considered excessive in the circumstances, exceeds 3 hours, or the player is present and gambling during 9 consecutive room sweeps, staff will interact with the player to assess their well-being and assist with identifying whether the player is a problem gambler, provide the appropriate information, and complete an IOR. If applicable, staff might encourage the player to take a break or terminate the player's session of play.

CASH ADVANCES AND SELF-IMPOSED LIMITS

EFTPOS & ATM access

Gambling on gaming machines is a lawful activity when carried out within the constraints of the Gambling Act 2003 and regulations. All requests for cash advances and use of on-premise ATMs will be supervised by trained venue staff.

PCL venues may or may not have arbitrary or mandatory limits on the amount of money that can be obtained using EFTPOS or ATMs, but all transactions must be considered in the context of customer behaviour including whether they are showing signs of problem gambling, and/or whether the customer has a history of problems known to the staff.

All requests for cash advances on EFTPOS and overall money limits will be assessed on a case-by-case basis. From 1 December 2023, any second or subsequent request to withdraw cash via EFTPOS, or access of cash from an ATM for gambling, requires staff to interact with the player to assist with identifying whether the player is a problem gambler. The interaction must be recorded by completing the appropriate records.

EFTPOS request declines and small amount withdrawals

Multiple EFTPOS declines or requests for small amounts of cash may result in a refusal of service. The procedures for managing these situations are outlined below. An IOR should be completed.

Breaking self-imposed spending or EFTPOS withdrawal limits

The breaking of self-imposed limits on EFTPOS withdrawals may result in a refusal of service. The procedures for managing these situations are outlined below. An IOR should be completed.

RECORD KEEPING

Incident and observation reports

Venue staff will use an IOR to record abnormal or problematic gambling behaviour including, but not limited to: signs of gambling harm, 2 or more withdrawals of cash to gamble, continuous play in excess of 3 hours, multiple general or strong signs of problem gambling, or any serious anti-social incident in and around the gaming room.

Where multiple general signs are observed in a single incident, or over time, staff should use the IOR to build a profile and record of the gambler's behaviour to assist in subsequent interventions and allow for information to be shared to ensure appropriate outcomes.

Weekly review of IORs, room sweep logs and ATM/EFTPOS logs

These reports will be collated and reviewed weekly by the Venue Manager or a person delegated to do so, in order to:

- assess whether the venue personnel have taken appropriate action following the identification of 1 or more signs of harm in a player;
- assess whether further action is required in respect of a player; and
- determine whether there are any players the Venue Manager, or the person acting on their behalf, has reasonable grounds to believe are problem gamblers.



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

- the date of the review; and
- any further action taken as a result of the review.

The Venue Operator will ensure all records are retained for a period of no less than 3 years.

INTERVENTIONS

General and strong signs of gambling harm

Staff will intervene where they observe the signs of problem gambling that apply from 1 December 2023. An appropriately trained venue staff member will approach the player and have a conversation to determine their state of welfare for the purpose of their continued gambling or a denial of service.

Whenever a conversation takes place, details of the interaction should be recorded in an IOR and consideration given to providing a Yellow Card (information), or to whether an exclusion is applicable.

Player and manager initiated exclusion orders

Staff may, when signs of problem gambling are observed, or as a pre-determined follow-up to a previous incident, or at the direction of the Venue Manager or Venue Operator, complete a Manager-Initiated Exclusion Order for the player concerned. Where appropriate, staff should be proactive and issue a Manager-Initiated Exclusion.

If a player requests a Self-Exclusion (Player-Initiated), staff will respond immediately and take the player through the exclusion process.

Information (Red Card) must be provided for both Manager-Initiated and Player-Initiated Exclusions.

If any doubt exists, the matter can be escalated to the Pub Charity Limited (PCL) representative.

INFORMATION FOR PLAYERS

Yellow/red cards

Staff and management will provide players with an appropriate level of information, as outlined in the procedures below, when general signs (Yellow Card) and strong signs (Red Card) of problem gambling are observed. Red Cards are also provided when both Manager and Player-Initiated Exclusion Orders are issued by staff.

The cards provided comply with the appropriate regulatory requirements and should be issued in a discreet fashion.

Player disputes/equipment faults/unpaid prizes

Staff will respond to any dispute over a gaming prize raised by a player, between players, or by staff themselves, completing the appropriate Player Dispute Form.

Staff will respond to and complete the appropriate form as required for any Equipment Faults or where prizes are unpaid for any reason (see Procedures).

All normal day-to-day EGM Faults not requiring completion of Equipment Fault forms will be reported to the relevant service provider for the venue so that records can be made available if required by the DIA.

TECHNOLOGY

Facial recognition/TIV cameras

Where these are fitted, venue staff will be trained in utilising Facial Recognition (FR) and Time in Venue (TIV) cameras for the purpose of monitoring and detecting durations of continuous play in excess of 3 hours, multiple periods of play in one day, and excluded gamblers entering the venue. Person of Interest (POI) and TIV activations will be responded to with priority and appropriate action will be taken to correctly identify any person triggering a POI or TIV alert.

Any POI or TIV activation, the actions taken, and the outcome must be recorded in an IOR.

DIA AUDIT

Should the DIA visit any PCL venue, all required staff will cooperate fully, providing any information requested and advising Inspectors of relevant venue policies and procedures.

INFRINGEMENT FEES

From 1 December 2023 new infringement fees may be issued by the DIA for the following:

<p>The Venue Manager is personally liable to a \$1,000.00 fine in each of the following events:</p>	<ol style="list-style-type: none">a. Failure to undertake a sweep.b. Failure to record the required information in relation to a sweep.c. Failure to have a conversation with a player who has exhibited 1 or more signs of harm.d. Failure to record the required information in relation to identified signs of harm.e. Failure to review incident records, or ensure another person reviews records, for at least the previous 7 days, at least once each week.
<p>The Venue Operator is liable to a \$1,000.00 fine in each of the following events:</p>	<ol style="list-style-type: none">a. Failure to ensure that gaming machines are not visible from outside the venue (except intermittently when an external door is in use).b. Failure to ensure that records are kept for at least 3 years after the date on which they were recorded.

GAMING MANAGEMENT PROCEDURES

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.

These procedures have been developed to provide a consistent and effective best practice response to obligations that come with hosting Class 4 gaming machines. The objective of the implementation of these measures is that the harm from gambling activity at PCL venues should be wherever possible prevented or minimised.



Section 3 of the Gambling Act 2003 states:

“A Problem Gambler means a person whose gambling causes harm or may cause harm”

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.



No (low)
risk

No (low) Risk Signs of No Risk behaviour can include:

- Calm and enjoying play
- Irregular player/social play
- Limited playing time
- Few if any EFTPOS withdrawals (no declines)



At risk

Signs of At Risk behaviour. Indications a person **may** be experiencing adverse consequences from their gambling can include:

- Frequent attendance in the gaming area
- Long sessions of play (playing for extended periods)
- Declined EFTPOS or ATM transactions
- Changing low denomination coins or requesting small EFTPOS withdrawals to gamble
- Being argumentative while gambling or complaining about fairness of games
- Any noticeable increase in the frequency of gambling or amounts spent
- Unusual behavioral routines when gambling
- Max betting and frequent use of the 'double-up' feature



High risk

Signs of Gambling Harm (Harm Min Regs 2023)

- 2 or more EFTPOS or ATM withdrawals to gamble
- Long session of play (playing for 3 hours or more)/Identified gambling during 9 consecutive room sweeps
- Borrowing or attempting to borrow money to gamble from the venue or others
- Leaving children unattended
- Waiting for the venue to open to gamble
- Refusing to stop or appearing to be unable to stop gambling (when the venue is closing)
- Appearing visibly distressed, such as damaging the gaming machine

Other 'Strong' Signs

- Prioritising gambling above family, friends, employment, self (hygiene)
- Disorderly or abusive behaviour
- 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.



It is a legal requirement to have trained staff on duty at all PCL venues whenever gaming machines are in operation, with the overall responsibility being with the Venue Manager.

PCL will provide practical and interactive training to all venue staff who are involved in gaming and will also complete regular refresher courses within 12 months of previous training.

It is important that the venue advises PCL when new staff come on board so training can be provided as soon as practical.

Untrained staff cannot be deployed to supervise gaming at the venue until trained by PCL.

The training will include, but may not be limited to, 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	Advise a player that they have reasonable grounds to believe that they are a problem gambler, and ban the player from the gaming area of the venue concerned for up to 2 years.
F	Advise a player that he or she can identify himself or herself as a problem gambler and request that the Duty Manager exclude them from the gambling area for up to 2 years.
G	Monitor for signs of harm, including conducting a minimum of 3 room sweeps per hour, monitoring player access to cash to gamble, and recording those incidents.

Training will be regularly updated to ensure venue staff are kept abreast of any changes in policy or any new requirements resulting from changes in the laws and regulations for Class 4 Gambling.

The training will include practical and interactive sessions on:

H	Interacting with players to gain familiarity and build a rapport with them.
J	Initiating conversations with a player who may be experiencing harm.
K	How to interact with a player who is distressed or agitated.
L	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 multivenue exclusions.

Training will include the following information:

M	Information about identifying the signs of gambling harm.
N	Basic information about how gaming machines work, including problem gambling behaviour associated with gaming.
O	First-hand accounts (which may be pre-recorded) from people who have experienced or been affected by harm and information about the types of harm.
P	Information about problem gambling services and other organisations that can provide support to people affected by harm.
Q	Information about what resources are available to staff to help prevent and minimise harm including the procedure for Manager and Player Initiated Exclusion Orders.
R	In addition to IORs, staff will maintain records of all gaming room sweeps including; <ul style="list-style-type: none"> • the name or ID of the venue personnel who conducted the sweep; • the date and time of the sweep; • how many players were present in the gambling area during the sweep; and • if a gambling area sweep is not conducted because venue personnel could verify through other means that the gambling area was unoccupied by players, record that occurrence and what method was used to determine that.
S	Where signs of harm are identified (including 3 or more hours of continuous play and 2 or more cash withdrawals) an appropriate IOR will be completed, including the following information: <ul style="list-style-type: none"> • the name of the venue personnel who identified the sign of harm; • the date and time that the venue personnel identified the sign of harm; • any 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); • which sign of harm was identified; • the name of the venue personnel who had the required conversation with the player; • the date and time that the venue personnel talked to the player; • a summary of any conversation with the player; and • any further action taken, or to be taken, in respect of the player.
T	The Venue Manager must review, or ensure that a person reviews on their behalf, the records for at least the previous 7 days, at least once each week, to; <ul style="list-style-type: none"> • assess whether the venue personnel have taken appropriate action following the identification of 1 or more signs of harm in a player; • assess whether further action is required in respect of a player; and • 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. <p>The Venue Manager, or the person acting on their behalf, after reviewing the records, must record:</p> <ul style="list-style-type: none"> • the date of the review; and • any further action taken as a result of the review. <p>The Venue Operator must ensure that information recorded is retained for a period of 3 years after the date on which it was recorded.</p>

If a staff member is in any doubt or has concerns, they should contact the Venue Manager or PCL representative.

PCL staff will also review your Incident and Observation Register on their visits and talk through any concerns staff may have. Additional resources are available in the PCL Gaming Bar Book.




VENUE STAFF RESPONSIBILITY

The principles of good Host Responsibility require 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.



Every point of contact is an opportunity to **observe and assess** player well-being.

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 gaming room, the duration of their play, and the intensity of their gambling, taking note of 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, such as their emotional state.</p> <p>These obligations to monitor the player are easily remembered using the prompt; A.T.M.</p>
<p>Interaction</p>	<p>If practical 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.</p> <p>This interaction permits an initial assessment of a person's well-being or state of mind.</p> <p>To interact, staff should make frequent sweeps of 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.</p> <p>While monitoring players, if staff note any changes in behaviour or behaviours that may be a sign of problem gambling, deliberate observation is now required.</p> <p>Isolated behaviours causing concern should be recorded by staff in the Incident and Observation Register (IOR) and observations should continue.</p> <p>It is important for staff to look through the IOR each time they start their shift as this will bring them up to speed with any events that have occurred while off duty, and assist with building a picture of a player's behaviour over time.</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;">  <p>A ANGER</p> </div> <div style="text-align: center;">  <p>T TIME</p> </div> <div style="text-align: center;">  <p>M MONEY</p> </div> </div>

Initial intervention	<p>When staff observe behaviour that may be a sign or signs of gambling harm, some form of intervention is required. The initial verbal intervention is for the purposes of assessing the player's well-being, "Is everything OK?".</p> <p>It is also used to determine the gambler's personal circumstances to ascertain if they are in a position to be gambling. This approach is designed to be non-judgmental or non-confrontational.</p>
Subsequent intervention	<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>
Inform	<p>Based on the responses to these specific questions the staff member may decide to provide the player with detailed information about problem gambling.</p>
Exclude	<p>An intervention may result in the staff member believing on reasonable grounds that the person is a problem gambler; that is, their gambling is causing them or others to experience adverse consequences.</p> <p>A Manager-Initiated Exclusion Order should then be issued along with information on seeking help for problem gambling. Any obvious problem gambling behaviours or disorder requiring immediate intervention should be acted upon and an Exclusion Order issued.</p> <p>Exclusion Orders are part of a broader set of initiatives under the Gambling 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 may be 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>

DIA AUDIT VISITS

Should the venue be visited by the DIA for the purpose of auditing or for any other reason, the Venue Manager will cooperate fully with any requests and requirements. The Venue Manager will collect the Gaming Bar Book, Incident and Observation Register, Exclusion Order Folder and all supplementary Training records and present this to the DIA immediately. All questions will be answered honestly to the best of that staff member's knowledge.

FACIAL RECOGNITION (FR) SYSTEMS (IF INSTALLED)

Staff will follow the requirements as trained on the acceptance of MVE's and the detection of excluded persons and high-risk gamblers.

Should QEC through POI detect a suspected excluded gambler, staff will respond immediately, identifying the gambler and taking the appropriate action in removing such person from the venue and completing all appropriate documentation, namely the Incident and Observation Register.

Time In Venue (TIV) software uses the FR system to indicate if a person is detected in the gaming room 3 hours after first being recorded. The TIV system does not record breaks in play and as such should not be seen as a confirmation of continuous presence, but staff are required to follow up on a TIV alerts in COMS and investigate.

If installed the **COMS Room Sweep Module** will record staff room sweeps and identify persons present during the previous sweep and allow for confirmation of continued presence. Any person detected as present and gambling during 9 consecutive sweeps must be approached and spoken to in order to assess their well-being, an IOR completed, and information provided.

VENUE RESOURCES AND PHYSICAL ENVIRONMENT

Pub Charity Limited as the venue's gaming society will supply the venue with harm minimisation and prevention brochures, posters, signs, notices, and an electronic or static compliance board and the venue must display these resources in the gaming area as required.

Information includes advice for the player about the existence of this policy and the odds of winning on a gaming machine, encouraging 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 of 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.

Any ATM on the premises must be in line of sight of staff.



UNDER AGE GAMBLERS

The venue must have a strict policy on underage persons in the gaming room and no exceptions should be tolerated.

18 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 the 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 & IDENTITY

If venue staff are unhappy with a person's age they should approach the person concerned and seek evidence of age documentation.

There are four forms of evidence of age and identity that are acceptable:

- Valid passport;
- New Zealand (photo) Driver's Licence;
- HANZ 18+ Card;
- Kiwi Access; or
- Firearms Licence.

EXCLUSION ORDERS

Staff will, when multiple problem gambling signs or significant situations present, as per the Incident and Observation Register, complete a Manager-Initiated Exclusion for the person concerned.

If any doubt exists, the matter is to be escalated immediately to the PCL (Pub Charity Limited) Representative.

Following the expiration of any type of Exclusion Order, the Venue Manager/Duty Manager may wish to interview the person on their return to ascertain if whether that person is able to gamble in the venue.

ROOM SWEEPS

Venue staff will undertake regular room sweeps as required, at least 3 times per hour and at least 10 minutes apart, monitoring for durations of play in excess of 3 hours, players present and gambling during 9 consecutive room sweeps, or any other signs of gambling harm.

IMPOSING LIMITS ON PLAYERS

Gambling is a lawful activity. The venue may wish to limit the amount of money that a customer can withdraw on EFTPOS considering whether any signs of harm or history of problems are identified.

Breaking self-imposed \$ or time limits

Staff must undertake a risk assessment of any player breaking self-imposed limits. If a player breaks a self-imposed limit in time or money spent venue staff may refuse further service reminding the player... "Remember you said no more...?"

Changing cash multiple times

Venue staff should be aware of players changing cash to gamble.

Withdrawing or cashing small amounts of money (less than \$10)

Staff will treat this on a case-by-case basis taking into account any other problem gambling signs that have been displayed or brought to their attention.

Attempts to borrow money

Attempts to borrow money from anybody for the purposes of gambling are a sign of problem gambling and intervention is required.

Long period of play

If the player is observed as present and gambling during 9 consecutive rooms sweeps, this will be considered a long period of play and the player spoken to.

Consideration should be made to the difference between Continuous Play v Continuous Presence, with continuous presence meaning that persons have had a break in their gambling, which does not constitute a long period of play.

If staff have asked "Is everything is OK?" and there are no other problem gambling signs, the player will be allowed to continue to play, but will be monitored and observed. An IOR may be completed.

PLAYER DISPUTES/EQUIPMENT FAULTS & UNPAID PRIZES

Any Player Disputes/Equipment Faults & Unpaid Prizes will be acted on immediately in accordance with the procedures outlined in The PCL Gaming Bar Book and the required forms completed.

The PCL Representative and service provider is to be advised.

GOT A QUESTION?

At any time, if you require assistance or support please contact your Pub Charity Limited Representative:

0800 42 64 64 (0800 GAMING)

www.pubcharitylimited.org.nz

