

HARM PREVENTION AND MINIMISATION POLICY

2024



POLICY OBJECTIVE

Pub Charity Limited (**PCL**) 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 provided with information and 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** player behaviour;
- ✓ **Identifying signs of problem gambling**
- ✓ **Observing & interacting**, 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**.



Section 4 of the Gambling Act 2003 states:

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

Harm means;




"Harm or any distress of any kind arising from, or caused or exacerbated by a person's gambling, this includes personal social or economic harm suffered by any person, their spouse or partner, family, whanau, workplace, community, or society at large."

MONITORING 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.

Our 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.

When monitoring player behaviour staff will need to assess players based on risk profiling:

 <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. Indications a person may be experiencing adverse consequences from their gambling can include:</p> <ul style="list-style-type: none"> ✓ 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
 <p>High risk</p>	<p>Signs of Gambling Harm (Harm Min Regs 2023)</p> <ul style="list-style-type: none"> ✓ 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 <p>Other 'Strong' Signs</p> <ul style="list-style-type: none"> ✓ 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.

PLAYER OBSERVATIONS AND INTERACTION

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

A room sweep is;

“Venue staff will undertake sufficient additional gaming area/ room sweeps at least **3 times per hour** and **at least 10 minutes apart**.

in relation to a class 4 venue, a room sweep means the physical observation of a place where gaming machines are located to—

(a) observe player behaviour; and

(b) monitor for signs of harm, including;

• For the purposes of these regulations, the signs of harm include (without limitation) the following:

- withdrawing, or attempting to withdraw, cash from an automatic teller machine or EFTPOS device on 2 or more occasions in 1 day to use for gambling at the venue:
- gambling during 9 or more consecutive gambling area sweeps:
- attempting to borrow money from venue personnel 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:
- appearing visibly distressed or angry either during or after gambling (for example, crying, holding their head in their hands, or hitting a machine).

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.

Staff must take all reasonable steps to identify whether a player has been gambling during 9 consecutive room sweeps, including recording sufficient information manually by completing a room sweep log, or through record keeping from applicable CCTV technology, to identify the players present during initial and subsequent room/area sweeps.

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 Incident and Observation Report (**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 & 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.

Providing credit to a player to gamble is strictly prohibited.

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 (IOR)

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**.

Record Keeping of Exclusion Orders

The venue must maintain on the premises, either electronically or in paper format, a record of all current Exclusion Orders applicable to that venue.

INTERVENTIONS

General and strong signs of gambling harm

Staff will intervene where they observe the signs of problem gambling that apply from 1st 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 and Multi Venue Exclusion (MVE) requests

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 must respond immediately and take the player through the exclusion process.

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

The venue may receive by email, COMS or postal mail a MVE request from a player who may or may not be known to the venue. The venue manager, or person delegated by the manager, must treat such a request in the same manner as a player-initiated request.

On verification of the provision of an appropriate authority from the player, and the provision of an adequate means of identification, the venue should at the first opportunity complete an Exclusion Order and return it to the applicant's contact address provided.

Any questions by staff concerning the issuing of an Exclusion Order should be escalated immediately to the relevant PCL representative.

Removal of Minors and Excluded Persons on detection

Venue staff must maintain a line of sight to the entrance to the gaming room and undertake regular sweeps of the gaming room in order to monitor for the presence of excluded persons or minors in the gambling area.

Whether an excluded person or minor is identified physically or automatically by way of facial recognition systems the staff must act immediately to remove that person from the gambling area. Any such incident must be recorded by way of completion of an Incident and Observation Report.

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.

DIA AUDITS

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.

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>	<ul 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>	<ul 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.

FACIAL RECOGNITION (FR) SYSTEMS (IF INSTALLED)

Staff will respond to the detection of POI or excluded persons and high-risk gamblers.

Should QEC through **Person of Interest (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 an Incident and Observation Report.

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 clearly 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.

Restrictions on jackpot advertising and branding

The Venue Operator must ensure that no advertising relating to a gaming machine jackpot at the class 4 venue is published inside or outside the venue in a way that makes the gaming machine jackpot advertising visible or audible to persons outside the venue.

The Venue Operator must also ensure that any advertising or promotion by the venue does not include the word 'jackpot' or convey explicitly or implicitly in any way, including using other words or get-up, that there is a gaming machine jackpot at the venue.

UNDER AGE GAMBLERS

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

- ✓ 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.
- ✓ Prizes or prize winnings must not be paid to an underage person.

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.

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.

SUMMARY

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. Training will 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.

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	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.
B	Initiating conversations with a player who may be experiencing harm.
C	How to interact with a player who is distressed or agitated.
D	Approach a player that the manager or employee has reasonable grounds to believe may be experiencing difficulties relating to gambling.
E	Provide information to a player about the characteristics of problem gambling (including recognised signs of problem gambling).
F	Provide information to a player about the potential dangers of problem gambling.
G	Provide information to a player about how to access problem gambling services.
H	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.
I	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.
J	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 also include the following:

K	Information about identifying the signs of gambling harm.
L	Basic information about how gaming machines work, including problem gambling behaviour associated with gaming. <ul style="list-style-type: none"> • 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.
M	Information about problem gambling services and other organisations that can provide support to people affected by harm.
N	Information about what resources are available to staff to help prevent and minimise harm including the procedure for Manager and Player Initiated Exclusion Orders.
O	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.
P	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.
Q	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.
R	The Venue Manager, or the person acting on their behalf, after reviewing the records, must record: <ul style="list-style-type: none"> • the date of the review; and • any further action taken because of the review.

The Venue Operator must ensure that information recorded is retained for a period of **3 years** after the date on which it was recorded.

