

Harm prevention and minimisation policy

Members of NZCT and their venue operators accept a duty to provide a responsible gaming environment. Such an environment exists where the potential for harm is minimised and patrons can make informed decisions about their participation in gaming activities.

Gaming machines provide an enjoyable leisure activity within the hospitality industry, however, it is acknowledged that some individuals may be at risk of developing addictive gambling behaviours and 'other persons' may also be affected.

NZCT has adopted the following harm prevention and minimisation policy in regard to problem gambling and the facilitation of responsible gambling at NZCT Class 4 venues. NZCT will identify potential problem gamblers and take appropriate action to prevent them becoming actual problem gamblers and will minimise the risk of problem gambling occurring at our venues by taking appropriate steps to prevent actual problem gamblers gambling at our venues. In order to do the above, we will ensure the following objectives are met:

- (i) The facilitation of responsible gambling.
- (ii) Risk minimisation of problem gambling; and
- (iii) The prevention of problem gambling to the extent that it is possible to do so.

Problem gambling is gambling that causes harm or may cause harm

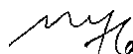
"Problem gambling can be described as occasional or regular gambling to excess, to the extent that it leads to problems in other areas of life, particularly with finances and inter-personal relationships. These problems range from minor ones involving, for example, arguments with the family over gambling expenditure, to problems involving a compulsive addiction to gambling resulting in major financial or inter-personal difficulties."¹

"The harmful effects of problem gambling can include financial problems, problems at work (ranging from poor performance to fraud), alcohol abuse, mental health problems and family violence... Problem gambling almost invariably affects not only the gamblers themselves but also the other people in their lives."²

¹ Department of Internal Affairs 1995, Report on the Social Impact of Gambling, p 102

² Department of Internal Affairs, 2005

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To ensure that the above objectives are met and that staff at each venue are aware of their responsibilities, each venue will appoint a Venue Nominee who will be responsible to ensure that the venue maintains responsible gambling policy standards.

If a nominee is not assigned the responsibility will default to the Venue Manager

The policy for identifying problem gamblers includes the identification of potential and actual problem gamblers. All gamblers have the potential to develop a gambling problem and are therefore identified as potential problem gamblers. Some potential problem gamblers will be more at risk than others.

The characteristics of a potential problem gambler include but are not limited to the following:

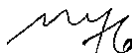
1. Patron requests credit on site.
2. Patron has long sessions of play.
3. Patron is intoxicated playing machine.
4. Patron plays two or more machines.
5. Patron exhibits disorderly behaviour.
6. Patron repeatedly attempts to cash cheques.
7. Patron appears distressed.
8. Patron causes damage to machine.
9. Patron has frequent attendance in gaming area.
10. Patron opens pay packet and inserts money during play.
11. Patron has extreme mood swings.
12. Patron attempts to borrow money from person on-venue.
13. Patron has arguments with other customers/staff.
14. Patron makes verbal statements relating to harm factors related to gambling.
15. Patron holds head in hands for long periods sitting at gaming machine.
16. Patron is crying at machine.
17. Patron is verbally abusive towards machine.
18. Patron refuses to leave machine re toileting etc.
19. Patron is unaware of time he/she has been gambling.
20. Patron attempts to sell personal effects at venue.

A venue manager/nominee or person acting on behalf of the venue manager/nominee will address any concern over any potential problem gambler's behaviour.

Harm Minimisation Incident Register

- A Harm Minimisation Incident Register will be used to document all actions taken with respect to gamblers (both potential and actual problem gamblers) at NZCT Class 4 venues.
- Documentation will assist with training our venue personnel based on concrete examples.

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- Well documented evidence of harm in our Harm Minimisation Incident Register will protect both the gambler and the venue manager/nominee in the issue of venue exclusion orders, if later required in a court setting.
- Documentation will result in responsible action taken by staff who will recognise in the completion of documentation, the need to be fair and objective.
- Documentation will be essential for any review process.
- Documentation will establish compliance with the objectives of the Gambling Act relating to harm minimisation, harm prevention and the facilitation of responsible gambling.

Limitations of observational data for identifying potential or actual problem gamblers

NZCT observes the limitations of observational data alone in identifying potential and actual problem gamblers. Furthermore NZCT notes that the consensus of professional opinion re problem gambling experts Allcock, Blaszczynski, Dickerson et al relating to the identification of problem gamblers in gambling venues was as follows:

"There are no behaviours and signs that a problem gambler may display that can be used as a reliable and valid index for use by gaming staff. However:

1. Patrons often directly approach staff seeking assistance or guidance when they have a gambling problem. They may also indirectly ask staff for assistance by expressing concern about their gambling habit.
2. Staff should know that it is quite common for regular players to overspend both time and money; and
3. If patrons are in obvious distress, then the venue manager or nominee should respond with care."³

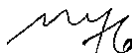
An actual problem gambler is "a person whose gambling causes harm or may cause harm"⁴. Harm in the Gambling Act 2003 is defined as:

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

³ Allcock, Blaszczynski, Dickerson et al. Current issues relating to Identifying the Problem Gambler in the Gambling Venue. Australian Gaming Council, 2002. This is available on the Australian Gaming Council website www.austgamingcouncil.or.au

⁴ Gambling Act 2003

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- (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.

Evidence of harm or potential harm may include the following:

- 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 where I am going to get the money for groceries".
- 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 gambling manager or other venue staff.

Individuals who self-identify as problem gamblers or who are identified as potential or actual problem gamblers will be offered information and advice.

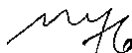
This information and advice will include the provision of exclusion orders and problem gambling literature which will be continuously refined and updated as the venue determines. Staff will facilitate the use of Exclusion Orders in accordance with the legal responsibilities under the Gambling Act in order to prevent problem gamblers from gambling at the venues.

Procedural guidelines for the implementation of this policy and our legal obligations relating to s.302, s.305, s.307, s.308, s.309, s.310, s.311 and s.312 of the Gambling Act 2003 will follow a standardised format as detailed in the Procedural Guidelines for the Implementation of Harm Prevention and Minimisation Policy Manual at NZCT Class 4 venues. Note that the Procedural Guidelines for the Implementation of the Harm Prevention and Minimisation Policy compliments the policy in terms of standardised procedures for implementation. The Procedural Guidelines Manual will be reviewed and amended as required to best facilitate the implementation of the policy.

If a copy of this Procedural Guidelines Manual is required, please contact:

New Zealand Community Trust 0800 44 69 28

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Provision of problem gambling literature

NZCT will ensure that appropriate problem gambling literature is available either as signage and/or brochures. The venue manager/nominee must ensure that this literature is available to patrons at all times.

The guidelines for signage at a venue will be in accordance with the regulations and game rules as advised by the Department of Internal Affairs.

Problem gambling literature will be predominantly displayed in gaming areas and other areas identified by the venue manager/nominee and a representative of NZCT.

Trained staff member

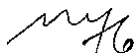
A trained staff member will always be available at NZCT Class 4 venues when gaming machines are in operation. This trained staff member will be familiar with procedural guidelines for implementation of the Responsible Gambling, Harm Prevention and Minimisation of Harm Policy. Exclusion Orders will be available at all times when Class 4 gambling is in operation.

Copies of the Exclusion Orders will be available upon request. The Harm Prevention and Minimisation Policy is also available upon request.

Under age gamblers

- Persons participating in gaming at this venue must be at least 18 years old.
- Every person under the age of 18 commits an offence and is liable on summary conviction to a fine not exceeding \$500.00 if they participate in gambling at this venue.
- Every Corporate Society that allows a person under 18 years to participate in gambling at this Class 4 Licensed venue, commits an offence and is liable on summary conviction to a fine not exceeding \$5,000.00.
- Every venue manager/nominee or key person employed at this venue, who allows a person under the age of 18 to participate in gambling at this venue, commits an offence and is liable on summary conviction to a fine not exceeding \$1,000.00.

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Patrons should not be offended if asked for evidence of age documentation

There are only three evidence of age documents that we will accept:

- Valid passport
- New Zealand photo driver licence
- HANZ 18+ card

Failure to produce evidence of age documentation will result in management excluding you from this venue.

Persons under the age of 18 years will not be paid out any prize money at NZCT Class 4 venues.

If staff at this NZCT venue have 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.

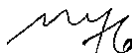
If any money is withheld, the venue staff will keep a record of the name, address of the person concerned, the amount of money won, the date on which the money was won and withheld, and advise that person that if they can provide satisfactory verification of their age within 7 days, the person will be paid the money withheld.

Any money not claimed in 7 days will be treated as net proceeds of gambling at this venue.

- Venue staff will actively monitor and check the area near the gaming machines for under age gamblers and all entrances and exits will be supervised.
- Venue specific under age notices will be located at entrances and in the vicinity of the gaming machines.
- Where possible NZCT will provide good quality functioning and monitored closed circuit TV (CCTV) coverage of the area in which the gaming machines are located.
- Frequency of checks of the location in which the gaming machines are placed will be determined by the venue manager/nominee having regard to the number of exclusion orders issued, the number of patrons, and the particular characteristics of the venue itself including all other relevant factors that the venue manager/nominee deems reasonable.

Under age gambling may indicate a potential problem gambling issue. If you are concerned about your gambling or another person's gambling, we urge you to seek help.

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Treatment providers

If you think you, or someone close to you has a gambling problem, we encourage you to act now. There are problem gambling help services in most areas of New Zealand. Free help can be accessed by calling one of the toll free numbers listed below.

- | | |
|--------------------------------------------|---------------------|
| ▪ Ministry of Health | 0800 611 116 |
| ▪ Problem Gambling Foundation | 0800 664 262 |
| ▪ Problem Gambling Hotline | 0800 654 655 |
| ▪ Woodlands Centre Charitable Trust | 0800 333 122 |

Treatment provider details are also included in the Problem Gambling brochures located in the gaming area at this venue.

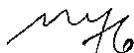
Admission to NZCT Class 4 venues

Please be aware of the following:

Under S.307 of the Gambling Act 2003 the following conditions apply:

- The fact that this venue is licensed as a Class 4 venue does not entitle any person to enter or remain on these premises.
- Any person at this venue, must leave if required to do so by, or on behalf of the holder of the venue's class 4 licence.
- The holder of a class 4 venue licence, or any person acting on behalf of the licence holder, does not need to give any reason for denying entry to a person, or requiring a person to leave this venue.

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