

2018

GAMBLING HOST
HARM MINIMISATION POLICIES



THE TRUSTS
Community
FOUNDATION

Gambling Host Harm Minimisation Policies

Introduction

Gambling is a form of entertainment for a number of people, however it is openly acknowledged that there are some who do find it difficult to keep within acceptable limits and therefore they will experience harm as a direct result of their gambling.

The Trusts Community Foundation, hereafter referred to as TTCF and/or this Foundation, has developed a set of Gambling Host Harm Minimisation Policies with the primary aim of ensuring that society personnel as well as venue operators and their staff are aware of best practice gambling host responsibility for gaming machine customers.

TTCF is dedicated to ensuring that our gaming machines are operating in an environment that supports responsible gambling and demonstrates a culture of care for gaming machine customers at all times. This Foundation wholeheartedly commits to providing ongoing training and support for all venue personnel to help ensure that they understand their role in looking after the gamblers at their venue.

For a detailed definition of harmful gambling refer to **Appendix One**.

TTCF's commitment to supporting venue personnel

We will support venue personnel to achieve the desired outcomes stated in this policy by:

- Providing all venue personnel associated with supervising a gaming machine operation with harm minimisation related training as soon as is practicably possible after they take over the business and/or commence employment. Refresher training will also be provided as and when required.
- Area Managers proactively providing venue personnel with ongoing support and advice as part of their normal call cycles and/or any other times that circumstances may dictate.
- Supplying venues with TTCF's Venue Resource Kit (includes HPA's Gamble Host Pack) which provides all the resources they require, including all relevant harm minimisation information, documentation, signage, contact details, etc.
- Having Area Managers present at as many as possible of the DIA compliance assessments and taking feedback arising from these assessments into account when reviewing policies, training packages, etc.

- Regular compliance assessments will be carried out at each venue by an Area Manager, with a view to ensuring that:
 - o All standard non harm minimisation related compliance requirements (as per the formal TTCF checklist) are being adhered to.
 - o Venue Operators and staff members are taking their harm minimisation obligations seriously.
 - o Venue personnel are able to answer questions designed to test their knowledge of harm minimisation best practice.
 - o Incident registers are being properly utilised (any significant issues will be discussed with key staff members during the visit).
 - o All signage is displayed appropriately in and around the defined gaming machine area.
 - o Information including service provider leaflets are available in the defined gaming machine area.
 - o Key venue personnel know where the TTCF Venue Resource Kit is located.

- Although the onus is on venue management to notify any training requirements, our Administration Office will proactively contact every venue operator at least once a month to check whether or not any new staff members need training and/or existing staff members need additional training. Area Managers will also check on training needs as part of their call cycle visits.

TTCF's Venue Specific Policies

1. A culture of care exists for gaming machine customers when:

- Venue management show leadership by encouraging and supporting staff members to undertake gambling host responsibilities.
- Venue management implement relevant processes so as to ensure that staff members proactively observe gaming machine customers' behaviour.
- All venue personnel are able to demonstrate that they are striving to provide a safe environment for gaming machine customers.
- All venue personnel are mindful of the need to interact with gaming machine customers in a respectful manner.

TTCF will assist venue personnel to meet their obligations through:

- *Helping them to understand gambling harm minimisation responsibilities and best practice.*
- *Encouraging and supporting them to undertake the gambling harm minimisation component of their role.*
- *Ensuring that processes relevant to each specific venue are in place to help them look after gaming machine customers.*

2. Venue personnel will meet their harm minimisation obligations as specified in the Gambling Act 2003¹ and Gambling (Harm Prevention and Minimisation) Regulations 2004 by:

- Attending training relevant to their roles and responsibilities in implementing these policies.
- Making an effort to understand their role in ensuring that the venue meets its obligations under the Gambling Act 2003 and associated Regulations.
- Not being afraid to seek guidance and/or additional training when they encounter something new or different.
- Notifying the designated Area Manager and/or TTCF Administration Office of any new staff members who require harm minimisation training and/or existing staff members in need of additional training.

TTCF will assist venue personnel to meet their obligations through:

- *Proactively helping them to understand venue related gambling harm minimisation responsibilities as well as overall best practice.*
- *Developing & implementing processes designed to:*
 - *Reduce the opportunity for excluded gamblers and/or minors from entering the defined gaming machine area.*
 - *Deal with minors and excluded gamblers found to be present in the defined gaming machine area*
 - *Ensure there is always one person on duty able to issue an exclusion order in a prompt and respectful manner.*
 - *Provide relevant information to gamblers about where to get support and also explains the various exclusion options.*
 - *Ensure that staff members continue to monitor any gambler exhibiting concerning behaviour or attitudes and know how to utilise the resources available to determine an appropriate response.*
 - *Ensure that all relevant signage and information is on display in a way that is readily accessible to gamblers. This may include details of exactly where the signage and information is to be located.*

3. Venue personnel proactively get to know their regular gaming machine customers and monitor them for behavioural changes that may indicate gambling harm by:

- Intentionally interacting with gaming machine customers and establishing their normal patterns of behaviour.
- Sharing details of interactions and observations amongst all relevant staff members to assist with identifying any changes in behaviour. This is particularly relevant at the end of each shift.

¹ Refer to **Appendix Two** for a comprehensive list of Class 4 Gambling Harm Minimisation obligations for venues.

TTCF will assist venue personnel to meet their obligations through:

- *Encouraging venue personnel to interact with their gaming machine customers by greeting them as they enter/exit the defined gaming machine area, initiating a conversation when they are withdrawing cash from Eftpos or come to the bar for service, and also periodically checking in with them while they are playing the gaming machines.*
- *Developing and implementing processes at venues to ensure personnel record all matters of concern, including any noticeable changes in a person's gambling behaviour.*
- *Developing and implementing processes at all venues to ensure personnel share their observations and concerns with all relevant staff members.*

4. Venue personnel recognise when a gambler displays any of the general or strong signs of harmful gambling when:

- They can distinguish between normal behaviour and the general or strong signs of harm and/or know to refer to TTCF's Venue Resource Kit and in particular the Gambling Harm Reference Cards provided with the Gamble Host Pack if they are unsure.
- They understand that while a person may only display one or more of the general signs it may not mean someone's gambling is causing them harm but at least they are aware that these behaviours could in fact be indicators of gambling harm and the person needs to be more closely monitored.
- They understand that if a person is displaying any of the strong signs, these behaviours are more than likely a clear indication of gambling harm and need to be dealt with.

TTCF will assist venue personnel to meet their obligations through:

- *Providing them with training and support on how to identify general and/or strong signs of gambling harm.*
- *Ensuring that they know where to find the resources they can use to help identify these signs e.g. refer to TTCF's Venue Resource Kit and in particular the Gambling Harm Reference Cards provided with the Gamble Host Pack.*
- *Area Managers testing staff members regarding their working knowledge of dealing with potential harmful gambling as part of the compliance checks.*

5. Venue personnel are aware of what's happening in the defined gaming machine area by:

- Regularly monitoring the defined gaming machine area, at all times checking for persons displaying signs of gambling harm as well as identifying any excluded gamblers or minors.

- Recording all noteworthy observations (including those where a person is displaying general and/or strong signs of harm) in a log book or incident register and sharing these with other staff members. The details of any intended responses in relation to their observations as well as the gambler's reactions to such responses also need to be recorded.
- Understanding their legal obligations in terms of continuing to monitor persons found to be exhibiting concerning signs and in determining an appropriate response.

TTCF will assist venue personnel to meet their obligations through:

- *Area Managers initiating discussions with key staff members regarding the observations that have been recorded and providing feedback on any areas of concern.*
- *Area Managers encouraging venue personnel to maintain a log which details the dates and times monitoring of the defined gaming machine area took place (our recommended frequency is every 15 minutes).*

6. Venue personnel will respond appropriately to signs of harmful gambling by:

- Knowing where to access the resources contained in the Venue Resource Kit.
- Following the relevant processes including telling their manager (or designated staff member) about any concerns they have about a particular person gambling at the venue.
- Having observed a person exhibiting one or more general signs of gambling harm, they will gently check-in on, and continue to monitor, that person.
- Having observed a person exhibiting one or more strong signs of gambling harm, they must advise a designated staff member immediately (it is expected that this designated staff member will take all appropriate steps to deal with the situation straightaway).
- Completing all required documentation, including exclusion orders, in a prompt and accurate manner (copies of relevant documentation need to be forwarded to the TTCF Administration Office).

TTCF will assist venue personnel to meet their obligations through:

- *Ensuring that the Venue Resource Kit is up to date and complete.*
- *Apprising all venue personnel of any recent developments and/or initiatives that may assist them in performing their role.*
- *Providing feedback on past events that have eventuated at the venue and identifying areas for improvement where appropriate.*
- *Providing guidance and/or additional training where necessary.*

Definition of Harm

The definition of 'harm' contained in the Gambling Act 2003 is very broad i.e.

Harm means harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and includes personal, social, or economic harm suffered:

- (i) by the person; or
- (ii) the person's spouse, civil union partner, de facto partner, family, whānau, or wider community; or
- (iii) in the workplace; or
- (iv) by society at large

Under the Gambling Act 2003 the definition of 'problem gambler' is also very broad i.e.

Definition of a Problem or 'Harmful' Gambler

A problem gambler is anyone "whose gambling causes harm or may cause harm."

In this way, 'problem gambling' does not necessarily mean 'pathological gambling' in a clinical sense. To make this clear, throughout these policies the term 'harmful gambling' has been used instead of the term 'problem gambling'.

Effects of Problem or 'Harmful' Gambling

While one person may be able to afford to spend \$20 on gambling, for another it may mean going without basic grocery items that week and while someone may be happy and safe spending a couple of hours in front of a gaming machine, for another that might take them away from caring for their children or other important responsibilities.

The financial and emotional stress arising from harmful gambling is likely to be affecting a person's household, their wider family and friends' network, and even their workplace.

Problems are likely to range from the person concerned having arguments with family members over the amount of money being spent on gambling, through to them facing major financial and/or inter-personal difficulties arising from a compulsive addiction to gambling.

Harm Minimisation Legal Obligations (Venue Specific)

The Gambling Act 2003 & the Gambling (Harm Prevention and Minimisation) Regulations 2004 require that:

1. The venue has a policy for identifying problem gamblers. The venue manager, or person acting on their behalf, must take all reasonable steps to ensure that the policy is used to identify actual or potential problem gamblers (Section 308). Failure to do so may result in a fine of up to \$5000.
2. There is always a staff member who has received problem gambling awareness training on duty at all times when gaming machines are available to the public. A trained staff member must be able to approach a player and provide appropriate information about problem gambling (Regulation 12).
3. A notice is displayed in the defined gaming machine area advising interested parties that you have such a policy and that a copy of the policy will be made available on request. (Section 308). Failure to supply a copy of this policy when requested may result in the venue manager being fined up to \$5000.
4. Once a problem gambler has been identified, or there are reasonable grounds to believe that the person is a problem gambler, an appropriate staff member must approach that person and offer information or advice about problem gambling (Section 309). That information or advice must include a description of the self-exclusion procedure (Section 309(2)).
5. After offering the advice and information an exclusion order may be issued by the venue manager (or person acting on their behalf). This prohibits the person from entering the defined gaming machine area for a period of up to two years. (Section 309(3)).
6. An exclusion order must be issued promptly if a person has identified themselves as being a problem gambler and has requested that the venue prohibit them from entering the defined gaming machine area. (Section 310). A venue manager (or person acting on their behalf) that fails to issue a self-exclusion order when requested commits an offence and is liable for a fine of up to \$5,000.
7. Venue personnel must take all reasonable steps to assist a person including, if appropriate, issuing an exclusion order if **(a)** they have already approached the person and provided information and/or advice regarding problem gambling; **(b)** the person has not requested a self exclusion order; **(c)** the person's ongoing behaviour means there are still reasonable grounds to believe they are a problem gambler. (Section 309A).
8. Excluded persons must not be permitted to enter the defined gaming machine area, and must be removed if they do so (Section 311). A venue manager (or person acting on their behalf) who allows an excluded person to enter the defined gaming machine area or fails to remove an excluded person may commit an offence and is liable for a fine of up to \$5,000) and the person themselves is liable for a fine of up to \$500 (Section 312).

9. The venue manager must keep a record of exclusion orders (Section 312A), including:
- The person's name and date of birth (if provided); **and**
 - Whether the person self-excluded, or received a venue-initiated exclusion; **and**
 - The date which the exclusion order was issued and the date of expiry; **and**
 - Any conditions imposed on the person's re-entry into the venue.
10. No one aged 18 or under is allowed to gamble at the venue (Section 302). If a person is suspected to be under age then venue personnel must refuse payment of any prizes (Section 305). Offences may result in a fine of up to \$5000.
11. Providing credit for gambling is prohibited (Section 15).
12. ATMs are not permitted in the defined gaming machine area of a venue (Regulation 3).
13. No advertising relating to a gaming machine jackpot can be published either outside the venue, or inside the venue in a way that is visible or audible to persons outside the venue (Regulations 9 and 10).
14. The following must be available to players (Regulation 11):
- Pamphlets containing information about the odds of winning on gaming machines and the characteristics of problem gambling, including the recognised signs of harmful gambling and how to seek advice.
 - Clearly visible signage that encourage players to gamble only at levels they can afford and contains advice about how to seek assistance for problem gambling.

Notes:

- This page covers off harm minimisation obligations at the venue level; it is not an exhaustive list of all harm minimisation requirements set out in the Gambling Act 2003, associated Regulations and Game Rules. For more information regarding the Act, associated Regulations or Game Rules, contact your designated Area Manager in the first instance or otherwise visit the Department of Internal Affairs website at www.dia.govt.nz.
- The Gamble Host Pack contains resources which will help you meet this requirement. If you cannot locate the pack included in the Venue Resource Kit provided by TTCF you can find all the information you need at gamblehostpack.choicenotchance.org.nz/