



SERIOUS ABOUT YOUR COMMUNITY

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## **VENUE POLICY FOR IDENTIFYING AND MINIMISING PROBLEM GAMBLING AT**

**{Venue Name}**

**July 2019/2020**

*Trillian Trust Limited have developed this policy with the intention of providing guidance to the venue manager and their staff in supporting best practice gambling host responsibility and creating a culture of care within its venues.*

**Trillian Trust Limited's commitment to supporting venue personnel:**

- Trillian Trust is serious about the community and acknowledges the responsibility outlined and is fully committed to work with all venue staff to minimise the potential harm caused by the operation of Class 4 gambling.
- Trillian Trust Limited will provide one on one training for venue staff, regular venue visits to provide ongoing support and guidance.

**Trillian Trust Limited's venue specific policies:**

- Venue personnel will meet their Harm Minimisation obligations as specified in the Gambling Act 2003 and Gambling (Harm Prevention and Minimisation) Regulations 2004. Problem Gambling material will be available.
- Trillian Trust will assist venue personnel to meet their obligations, ensuring that venue staff are trained and provided ongoing support. Trillian Trust aims to provide a safe environment to the venue patrons informing them of the harm and affects that gambling can have on an individual and their friends and family.
- Venue personnel are encouraged to know their patrons and observe their behaviours, which will be recorded in the Incident and Observations Report Book. Trillian Trust will review this information during venue visits.
- Venue personnel need to be aware of what is happening within their defined gaming area, by completing regular sweeps, and have visibility of the room entrance with direct line of sight as well as CCTV monitoring at the bar.

**Problem Gambler:**

1. A problem gambler is a person whose gambling causes harm or may cause harm.

**Definition of 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 –
  - By the person; or
  - The person's spouse, partner, family, whanau, or wider community; or
  - In the workplace; or
  - By society at large.

2. 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.

**Problem Gambling Policy:**

3. The Venue Manager and gaming staff participate in training to keep up to date with procedures for identifying problem gamblers and the problem gambler intervention process.
4. Where reference is made to “Venue Manager” throughout this policy, that definition is extended to include anyone working on behalf of the Venue Manager who will have received the appropriate Harm Minimisation Training.
5. The venue must ensure a trained Harm Minimisation person is always rostered on duty whilst the gambling/gaming area is open.
6. The Venue Manager must take all reasonable steps to ensure that the policy is used to identify actual or potential problem gamblers. Failure to take reasonable steps to ensure the policy is followed by the Venue Manager, or person acting on behalf, is an offence and is liable on conviction to a fine not exceeding \$5,000.
7. Gambling Brochures / Notices (HPA Resources) are displayed in the gaming area. The brochures and notices must inform players:
  - That the venue has a policy for identifying problem gamblers.
  - A copy of the Harm Minimisation policy is available upon request.
  - About the risks of gambling.
  - To not spend more than they can afford.
  - Of the information on assistance for gambling problems.
8. The gaming machines operated do not have banknote acceptors that accept notes higher than \$20.00 in denomination.
9. Credit is not provided.
10. Customers showing signs of intoxication are prohibited from playing the gaming machines and shall be requested to leave the premises if necessary.
11. A clock is prominently positioned in the gaming area and/or each machine clearly displays the correct time.
12. No syndicate play is permitted.
13. An ATM is not installed in the Gaming Area.

14. Monitoring of the area will be conducted by regular sweeps of the gaming area, CCTV surveillance, restriction at point of entry, and requesting evidence of age as necessary.

**Policy for Identifying Problem Gamblers:**

It is important to know what signs to look out for in customer behaviours. Be observant, make regular sweeps and be sure to share any concerns you may have with colleagues and the Venue Manager, these concerns are required to be recorded in the Incident and Observation Report book. It is also important that the Venue Manager or those acting on behalf of know how to and can approach the gambler discreetly and with sensitivity if required.

15. A person will be identified as a potential problem gambler if any or a combination of the following indicators are present:

- the person gambles for excessively long periods;
- the person has a high number of gambling sessions per week;
- the individual makes repeated requests to obtain cash out from an EFTPOS terminal or makes three or more visits to an ATM machine;
- the person is unaware of the length of time they have been gambling;
- the person expresses signs of anger or distress while gambling;
- the person has arguments with other players or venue staff i.e. disorderly/agitated behaviour;
- the person causes damage to the gaming machine;
- the person refuses to leave the machine re toileting etc;
- the person attempts to cash cheques;
- the person attempts to borrow money onsite;
- the person attempts to play two or more machines;
- the person is trying to win back losses
- the person drinks to excess while playing the gaming machines and starts to show signs of intoxication;
- the person falls asleep in the gaming area;
- where information is received that the person has received an exclusion order from any other Class 4 Venue;
- information is received from family or friends of the individual expressing concern that the person is:
  - gambling excessively;
  - possibly obtaining funds illegally for gambling;
  - using money for gambling which has been budgeted for other expenditure; or
  - has left children without adequate supervision while present in the gaming area.
  - any indication that the person is seeking to borrow money in order to gamble

16. Venue personnel will report to the Venue Manager and the Venue Operator any observed gambling behaviours that cause them concern. These concerns should be recorded in the Incident and Observation Report book.

17. If a problem gambler is identified, the Venue Manager will approach the person concerned and offer information and advice to the person about problem gambling. The Venue Manager should approach the person in a polite manner and ask to speak to them privately, in a separate and discrete area. Patrons shall at all times be treated with respect, sensitivity and a willingness to help. The Venue Manager will then:

- introduce themselves and advise their position at the venue;
- advise the player that the venue has a policy for identifying actual or potential problem gamblers.
- provide information to the player about the characteristics of problem gambling (including recognised signs of problem gambling);
- provide advice on the odds of winning;
- advise the player of the potential risks and consequences of problem gambling;
- tell the player how to access problem gambling services;
- explain the self-exclusion procedure including reminding the player that under the Gambling Act 2003:
  - a player can “self-identify” as a problem gambler and ask the Venue to exclude them from the gambling area for up to 2 years; and
  - management has the right to identify a person who they believe is a problem gambler and ban them from the gambling area for up to 2 years.

### **Exclusion Orders:**

18. Exclusion orders must be issued to self-identified problem gamblers. The Exclusion order form shall be kept in the Resource Kit provided by Trillian Trust.

19. The Venue Manager may issue exclusion orders.

20. The Venue Manager may refuse to issue an exclusion order if:

- The person requesting the order fails or refuses to comply with a request to
  - provide the person’s name and date of birth; and
  - either provide a recent photograph of the person or consent to a photograph of him or her being taken.
- The quality of the photograph is such that the person cannot be readily identified.

### **Multi-venue Exclusion Orders:**

21. The Venue Manager must determine if the problem gambler wishes to be excluded from multiple venues and explain that a professional will contact them to discuss further at that point.

22. Venue Managers must ensure that exclusion orders are completed in full for all multi-venue exclusion order requests received.

23. Concern – Venue Managers must ensure that new exclusion orders are accepted upon receipt and noted in the Incident and Observation Book. The electronic database is required to be reviewed regularly by all venue staff.

### **Trillian Trust Resource Kit:**

#### **Incident and Observation Report**

24. An Incident and Observation Report book is provided by Trillian Trust. This book must be kept in a secure location that is accessible to all venue staff. If a patron shows any

of the indicators of a problem gambler, a record shall be made of this in the Incident and Observation Report book.

25. Details of all approaches made, and exclusion orders issued shall also be recorded in the Incident and Observation Report book.
26. The contents of the Incident and Observation Report book shall be treated as sensitive and shall only be disclosed to venue staff, Trillian Trust staff, DIA representatives or any other duly authorised person.

### **Exclusion Orders**

27. Self-Exclusion - A copy of the exclusion order issued shall be held in the Completed Forms folder stored in the Trillian Trust Resource Kit. A copy of the exclusion order shall be given to the patron and a copy forwarded to Trillian Trust.
28. The Trillian Trust Resource Kit which includes the Incident and Observation Record book, Exclusion Book, and the Harm Minimisation Policy is located:

*(Enter Location of Resource Kit)*

29. Unless the Venue Manager has good reason to issue an exclusion order for a lesser period, the exclusion period specified in the order shall be a minimum of 3 months. Once issued, the exclusion order cannot be revoked, rescinded or withdrawn. Exclusion orders issued under the Gambling Act restrict entry to the entire venue unless the gaming area has been defined on the venue licence in which case the exclusion order only restricts entry to the gaming area of a venue.
30. The Venue Manager must take all reasonable steps to assist a person including if appropriate issuing a person with an exclusion order if:
  - A player has already been approached and provided information or advice about problem gambling.
  - A player has not requested to be issued with an exclusion order.
  - A player's ongoing gambling or other behaviour at the venue means that the Venue Manager, or person acting on behalf, still has reasonable grounds to believe that the person is a problem gambler.
31. Venue personnel must remove excluded persons who attempt to re-enter the gambling area. Failure to remove an excluded person is a criminal offence punishable by a fine of up to \$5000.00.

### **Policy for Minimising Risk of Underage Gambling:**

32. All gaming machines are located in a separate, defined area.
33. All gaming areas are under regular supervision by the Venue personnel. The supervision includes:
  - Line of Sight of Players – direct or with CCTV monitoring at the bar
  - Regular room sweeps (min 4 per hour) completed and looking for the following:
    - Customer behaviour
    - Excluded Persons
    - Under Age Players

- Length of time spent in the room
  - Interaction with players in the room
34. The gaming area has a sign advising that it is an offence for persons under 18 years of age to play gaming machines.
  35. Any individual who looks 21 years or under and enters the gaming area will be requested by staff to show photo identification to verify their age.
  36. Any person who fails or refuses to provide photo identification shall be asked to leave the gaming area and not re-enter the gaming area.
  37. A trespass notice will be issued to any individual who is found to be under 18 years of age playing the gaming machines. The trespass notice will prevent the person entering the gaming area while they remain under 18 years of age.
  38. Prize money will not be paid to any person who looks under 21 years of age and refuses to produce photo identification confirming that they are 18 years or older. The prize money shall be held along with details of the individual's name, address and the date the prize was won. The prize shall be held for 7 days and paid to the individual if photo identification is provided confirming that the individual is 18 years or older. If suitable identification is not provided within 7 days, then the funds shall be banked into the Trillian Trust account and an Unpaid Prize Report forwarded to Trillian Trust.