

 Harm Prevention & Minimisation Policy	Date: June 2019
	Revision No. 1.4
	Initials - KM
	Signature

1.0 Purpose

Grassroots Trust Limited operates a comprehensive “Harm Prevention & Minimisation Policy” at all of its gaming venues.

The purpose of the policy is to ensure that Venue Operators, the general public and the DIA have confidence in Grassroots Trust Limited; that information is communicated as efficiently and effectively as possible, and harm caused through Class 4 Gambling is minimised.

This policy supports our venues to provide best practice gambling host responsibility for their customers and it is expected that venue management will support their staff to provide a culture of care for gambling customers. Grassroots Trust Limited is committed to working with venues and their staff to ensure they understand their role in looking after gamblers at their venue.

This policy meets the requirements of the Gambling Act 2003 and supports the use of resources provided by the Health Promotion Agency, Gambling Host Packs.

2.0 Revision History

Date	Revision No.	
New Document	1.0	Harm Minimisation Policy
September 2013	1.1	Reviewed
August 2015	1.2	Reviewed & Amended
April 2018	1.3	Reviewed & Amended
June 2019	1.4	Review & Amended

3.0 People/Areas Affected

- The Board of Directors
- All employees working for or on behalf of the Grassroots Trust Limited
- Venues
- Department of Internal Affairs
- Community & Gambling Patrons

4.0 Policy

4.1 General

Grassroots Trust Limited recognises its social responsibility in operating gaming machines and is committed to providing an environment that supports responsible gambling at each venue. Grassroots Trust Limited is committed to complying with the Gambling Act 2003, regulations in relation to Harm Prevention & Minimisation and taking a pro-active approach to ensure gambling is conducted in a responsible, safe and socially acceptable manner. At the same time, Grassroots Trust Limited accepts individuals have freedom of choice in enjoying and participating in gaming as a form of their preferred entertainment.

This policy will assist with the reduction of problem gambling, identification of problem gamblers and ensure persons under 18 years of age do not participate in gaming at Grassroots Trust Limited venues.

4.2 Problem Gambler

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

Harm –

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

The Act's definition of "problem gambler" is very broad: a problem gambler is anyone who's gambling causes harm or may cause harm.

4.3 Problem Gambling

For many people gambling is a form of entertainment and poses no problem, however we acknowledge that some people will experience harm as a result of their gambling. Problem gambling can be described as occasional or regular gambling 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.

4.4 Grassroots Trust Limited is committed to supporting our venues, demonstrating a **culture of care** for gambling customers. We will support venues to achieve the outcomes in this policy by:

- a. Providing each venue with a full Health Promotion Agency: Gambling Host Pack;
- b. Ensuring that brochures and signs included in the Health Promotion Agency: Gambling Host Pack, are displayed in the gaming area and main work stations of each venue. The brochures and notices inform players about the hazards of gambling, encourage players not to spend more than they can afford and set out information on assistance for gambling problems;
- c. Ensuring a sign is displayed in the gaming area advising customers that the Venue has a policy for identifying Problem Gamblers, and that a copy can be made available upon request; this sign may be displayed electronically on an interactive electronic Compliance Display situated in the Gaming Room.
- d. Ensuring the gaming machines operating do not have banknote acceptors that accept notes higher than \$20.00 in denomination;

- e. Ensuring credit is not provided by Grassroots Trust Limited or any Venue Operator, Venue Manager, Venue Staff or Key Person of the venue. Cash out requests are not taken from credit cards;
- f. Ensuring Venue Staff prevent customers that are showing signs of intoxication from playing the gaming machines and will request they leave the premises if necessary;
- g. Ensuring each machine clearly displays the correct time;
- h. Ensuring a sign is displayed in the gaming area advising customers that no syndicate play is permitted;
- h. Ensuring an ATM machine is not located in the Gaming Area of a venue;
- i. Ensuring a sign is displayed in the gaming area advising customers that the machines are not to be played by any person under 18 years of age;
- j. Ensuring the possibility of persons under 18 years of age gaining access to Class 4 Gambling at the venue is minimised by complying with paragraph 4.9 below; and
- k. Ensuring the venue enforces their Venue Harm Minimisation Policy to identify actual or potential problem gamblers.

4.5 Training

Grassroots Trust Limited will provide all Harm Minimisation Training and ensure that staff at all venues are trained including any follow up training required when staff changes occur. The Chairman has overall responsibility to ensure that all venues are trained in Harm Prevention and Minimisation. Harm Prevention and Minimisation Training will include, but not be limited to, the following:

- Delivery by PowerPoint presentation using the Gambling Host Responsibility Training resource provided by the Health Promotion Agency; and
- Review of the Health Promotion Agency: Gambling Host Pack Resources and Grassroots Trust's Resource Kit.

Full training is provided to each venue and their gaming staff annually. This training is however provided more regularly where the need arises i.e. new venue staff, refresher training.

Quarterly Compliance Checks/Venue Audits will be completed at each venue and will include a section on Harm Prevention and Minimisation. This section includes:

- a. Testing a staff member's knowledge of Harm Prevention & Minimisation practices;
- b. Discussions with Venue Management over processes in place to support staff in meeting their Harm Prevention & Minimisation commitments and responsibilities;

- c. Discussions with Venue Management over the process in place to educate and train new staff;
- d. Identifies any further Harm Prevention & Minimisation Training requirements at the venue.

Understanding and distinguishing between the general and strong signs of gambling harm; and knowing how to respond appropriately is a key focus in all training delivered to venue staff.

4.6 Identifying Problem Gamblers

Grassroots Trust Limited is committed to ensuring our training focuses on ensuring our venues provide a safe environment for gambling customers and that staff interact with their gamblers in a respectful manner at all times.

The Venue Manager and Venue Staff are required to participate in training to keep up to date with procedures for identifying problem gamblers and the problem gambler intervention process.

A person may be identified as a potential problem gambler if three or more of the following General Signs are present:

General Signs

Length of Play

- Gambles for long periods (three or more hours) without taking a break;
- Gambles most days; and
- Finds it difficult to stop at closing time.

Social Behaviour

- Becomes angry at or stands over other players;
- Rude to other gamblers or staff; and
- Complains to staff about losing.

Money

- Puts large wins straight back into the machines;
- Tries to withdraw money two or more times from eftpos or an ATM machine;
- Eftpos repeatedly declined; and
- Leaves venue to find more money to gamble.

Behaviour during play

- Tries to play two or more machines;
- Plays intensely without reacting to what's going on around them;
- Plays very fast (high spend per line);
- Shows frustration (grunting, groaning, playing roughly, causes damage to a machine);
- Shows some signs of distress (looks depressed, sweating, nervous/edgy); and
- Has gambling rituals or superstitions (rubbing, talking to machine).

A person may be identified as a potential problem gambler if one of the following Strong Signs are present:

Strong Signs

- Gambler tells staff that gambling is causing them problems;
- Shows obvious signs of distress (crying, holding head in hands, shaking);
- Has an angry outburst towards staff, customer or machine (shouting/swearing, kicking/hitting machines);
- Appearance or hygiene deteriorates significantly;
- Tries to borrow money from customers or staff;
- Tries to cash a cheque;
- Gambles from opening to closing;
- Leaves children in car while gambling;
- Friends or family raise concerns about the gambler; and
- Goes out of their way to avoid being seen at the venue (including asking staff to not let others know they are there).

Venue staff must be able to distinguish between the General and Strong Signs of harmful gambling. One General Sign on its own may not mean someone's gambling is causing them harm; these behaviours are good indicators of gambling harm and venue staff should gently check in with that person. If a gambler displays any of the strong signs, these behaviours are very likely to be indicating gambling harm.

Venue staff get to know their regular gambling customers' behaviours and monitor for behaviour changes that might indicate gambling harm. Details of observations and responses are shared so staff can identify changes in behaviour over time that may indicate potential gambling harm.

To ensure that venue staff do recognise changes in behaviour and monitor these changes, venues must commit to:

- a. Greeting gambling customers as they enter / exit the Gaming Area;
- b. Using eftpos withdrawals as an opportunity to interact and check in with the gambler;
- c. Intentionally monitoring the gaming area, checking for gamblers displaying signs of gambling harm, as well as excluded gamblers, and minors:
 - i. Regular Gaming Room Sweeps (when players are in the Gaming Room);
 - ii. Monitoring security monitor located in main work stations.
- d. Intentionally monitoring patron use of an Automatic Teller Machine (ATM) located inside the venue, checking:
 - i. Frequency of gaming patron use;
 - ii. Checking for gamblers displaying signs of gambling harm;
- e. Recording all observations in their Incident Diary and sharing these entries with other staff and management at shift change.

If a General Sign is observed in a gambler, the Venue Manager or Venue Staff should check in with the person concerned. If a Strong Sign is observed, venue staff should decide on the best person to approach the gambler. The Venue Manager or Venue Staff should approach the person in a polite manner and ask to speak to them

privately, in a separate, discreet area. Patrons shall at all times be treated with respect, sensitivity and a willingness to help. The Venue Manager or Venue Staff will then:

- Introduce them self and advise their position at the venue;
- Advise the player that the venue has a policy for identifying potential or actual problem gamblers;
- Provide information to the player about the characteristics of problem gambling (including recognised signs of problem gambling) i.e. wallet leaflet;
- Remind the player that the gaming machines take more money from gamblers than they pay out;
- 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 exclusion procedure including reminding the player that under the Gambling Act 2003:
 - i. A player can “self-identify” as a problem gambler and ask the venue to exclude them from the gambling area for up to two years.
 - ii. 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 two years.
 - iii. The Venue Manager must issue an exclusion order to self-identified problem gamblers.

Unless the Venue Manager or Venue Staff have good reason to issue an exclusion order for a lesser period, the exclusion period specified in the order shall be for 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 gaming area of a venue only. They do not restrict entry to the entire venue, unless the Gaming Area is not defined as a condition on the Venue Licence.

A record must be kept at the venue of each person excluded from the venue and must include the following:

- a. The persons name and date of birth;
- b. Whether the person has self-excluded or is venue excluded;
- c. Date of exclusion order issue and date of its expiry;
- d. Any conditions imposed on the person’s re-entry to the venue; and
- e. The excluded person’s photo (if provided).

The venue has a duty to assist a problem gambler if ongoing concern still exists. The Venue Manager or Venue Staff must take all reasonable steps to assist a person including if appropriate issuing a person with an exclusion order if:

- a. A Player has already been approached and provided information or advice about problem gambling;
- b. A player has not requested to be issued with an exclusion order; or

- c. A player's ongoing gambling or other behaviour at the venue means that the Venue Manager or Venue Staff still have reasonable grounds to believe that the person is a problem gambler.

Venue staff 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.

4.7 Refusing to Issue an Exclusion Order

The venue 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/or does not provide a recent photograph or does not consent to a photograph of him or her being taken. The venue may also refuse to issue an exclusion order if the quality of the photograph is such that the excluded person cannot be readily identified.

4.8 Multi-Venue Exclusion Order Requests

Grassroots Trust Limited is committed to engaging with the Multi-Venue Exclusion Order programme. The venue has a duty to ensure that Exclusion Orders are issued upon receiving multi-venue exclusion order requests from treatment providers and must ensure that the request is fulfilled promptly.

4.9 Minimising Risk of Underage Gambling

Grassroots Trust Limited has overall responsibility to ensure the following:

- a. All gaming machines are located in a separate, defined area of the Venue;
- b. All gaming areas are under regular supervision by the Venue staff, whether by way of direct view from areas commonly frequented by staff (eg the bar or reception) or via security surveillance which is monitored by staff;
- c. There is always one staff member trained in Harm Prevention & Minimisation at all times that the gaming machines are operational;
- d. The venues have signs at the entrance of the gaming area advising that it is an offence for persons under 18 years of age to play gaming machines;
- e. The Venue Operator, Venue Manager and Venue Staff will receive information from Grassroots Trust Limited outlining the age restrictions and the ability to request persons under 18 years of age to leave the premises;
- f. The Venue Manager and Venue Staff will ask any individual who looks 21 years or under and enters the gaming area for photo identification to verify their age;
- g. Any person who fails or refuses to provide photo identification shall be asked by the Venue Manager or Venue Staff to leave the gaming area and not re-enter the gaming area;

- h. Venue Operators will issue a trespass notice to any individual who is found to be under 18 years of age playing the gaming machines;
- i. The Venue Manager and Venue Staff will refuse to pay prize money 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 seven (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 seven (7) days, then the funds shall be banked into the Grassroots Trust Limited account and a report forwarded to Grassroots Trust Limited.

5.0 Facial Recognition

Where a venue has Facial Recognition Technology installed the system does not replace other provisions of this policy. Facial Recognition Technology assists Venue Staff in recognising registered problem gamblers as they enter and move around gaming rooms. Grassroots Trust Limited has overall responsibility to ensure the following:

- a. All MVE Requests, Exclusion Orders and Photos are uploaded to the database for venues with Facial Recognition Technology;
- b. Venue Staff are trained in how to manage the alerts through the QEC Venue Management System;
- c. Venue Staff understand the process required when receiving an alert through the QEC Venue Management System;
- d. Where an exclusion order breach is identified, notification of the breach is forwarded to Problem Gambling Health Provider, The Department of Internal Affairs and venues that have current exclusion orders relating to that problem gambler.

All venues must comply with this policy. A breach of this policy by the Venue Operator is a serious, material breach of the Class 4 Venue Agreement.

This policy will be reviewed every two years unless required earlier due to changes in regulations and/or the Trust's processes to ensure best practice Gambling Host Responsibility.