

DUNEDIN CASINOS LIMITED

**RESPONSIBLE GAMBLING
PROGRAMME**

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DUNEDIN CASINO

RESPONSIBLE GAMBLING PROGRAMME

Introduction

Dunedin Casino recognises the need to have a Responsible Gambling Programme, which is aligned with existing *Casino Control Authority* approved procedures in relation to self-exclusions (also referred to as self-barring) by patrons who acknowledge that they have a gambling problem, and provisions for trespassing patrons from the casino premises who cannot be coerced or refuse to elect the self-barring option when there are indications to suggest that they may have a gambling problem.

This programme is aligned with existing policies and strategy in relation to Dunedin Casino's advertising, marketing, and promotions, which have firmly established Dunedin Casino as a responsible and good corporate citizen in the Dunedin community.

The Responsible Gambling Programme, as a (further) condition attached to the casino operator's licence issued to Aspinall (NZ) Limited, is to be read in conjunction with the purpose of the *Casino Control Act 1990*, which authorises the establishment and operation of licensed casinos to; promote the development of licensed casinos in a manner consistent with the promotion of tourism, employment, and economic development generally; and to provide for the regulation of casinos in the public interest. It is important that these issues are balanced and objective, and that a common-sense approach is applied when dealing with issues surrounding responsible gambling. It is proposed that this programme will endeavour to balance individual rights versus the public interest.

Other issues, including individual privacy, freedom and choice, must also be taken into account. The operator acknowledges that any self-exclusion programme for problem gamblers must consider these and other legal issues, and deal with each case on it's merits with tact and diplomacy.

For the purposes of this programme, an authorised person shall include the following licensed casino personnel:

- Gaming Shift Manager;
- Acting Gaming Shift Manager;
- Security & Surveillance Shift Manager;

- Acting Security Shift Manager;
- Operations Manager;
- General Manager.

STAFF TRAINING

Casino Staff Orientation and Induction Programme

As part of the casino's staff orientation and induction programme, all 'front of house' staff shall receive training and instruction on the issue of problem gambling by a member of one of the recognised problem gambling counselling services.

This training will:

- Define problem gambling using the Diagnostic Criteria (DSMIV) which is used world-wide as a list of symptomatic criteria for identifying problem and/or pathological gamblers;
- Discuss the legislative framework applicable to Problem Gambling in New Zealand and how problem gambling is managed on a national basis;
- Review in depth Dunedin Casino's Programme for Problem Gambling Management, including presentations from third party treatment providers and senior management;
- Encompass a practical case study and the steps taken to self-bar or exclude a patron from the casino.

When thought necessary, the casino, in conjunction with the recognised counselling service, will undertake further ongoing training in the identification of problem gamblers, and the co-ordinated response.

Authorised Persons Training

All authorised persons shall receive additional instruction and training in relation to problem gambling management and the “Time Out” procedure/process, to ensure that a consistent approach is applied.

This training shall include:

- Defining problem gambling using the Diagnostic Criteria (DSMIV) – recognition and identification of the symptoms of problem gambling amongst patrons;
- Discuss Dunedin Casino’s Programme for Problem Gambling Management and Host Responsibility policies;
- Explain how staff are to approach and discuss problem gambling issues with patrons;
- Discuss the information materials available for patrons including the casino’s Problem Gambling brochures;
- Develop an understanding of the services of the Treatment Service providers.

Refresher Training

Authorised persons shall undergo refresher training in Problem Gambling Management from time to time. New authorised persons shall be included in these training sessions, meetings and de-briefings, to ensure a co-ordinated and consistent response to problem gambling issues.

TIME OUT (SELF EXCLUSION)

The “Time Out” procedure is a co-ordinated response that may be initiated by the operator as a first step, when they believe that a patron may have a gambling problem, or are identified as possibly being at risk of developing a gambling problem.

The situation would, in the normal course of events, be discussed between the Security & Surveillance Shift Manager or authorised person, and the Gaming Shift Manager.

The Security & Surveillance Shift Manager or authorised person may then discreetly, tactfully and diplomatically approach the patron, and invite the patron to discuss the matter.

Confidentiality and privacy issues shall be considered paramount at all times in the approach and any subsequent discussions or interviews with the patron.

The patron should then be discreetly and confidentially afforded a “Problem Gambling Pack” (refer to “Self-Barring”).

If it is felt appropriate, the patron should be encouraged to voluntarily withdraw their patronage from the casino for a mutually agreed period of no less than **one month** and up to **two years**. [Refer Appendix A/1 – “Time Out” Agreement].

This is for the purpose of providing a “time out” period from the casino, during which time the patron can reflect on their gambling behaviour and its effects away from the casino environment.

This will also provide a ‘window’ for the patron, while they take a break from the casino, to elect to undertake counselling services provided by any of the problem gambling agencies in the referral (problem gambling) pack.

After the agreed “time out” period has elapsed, the patron may return to the casino, provided they have met with the authorised person(s) with whom the initial “time out” discussions took place, to discuss their situation and what steps (if any) they took during their “time out”. The authorised person may request to include the patron’s spouse/partner in these discussions, so that a full appreciation of their situation can be made.

Wherever possible, the authorised person who initiated the process should see it through. This will mean ‘taking ownership’ of the particular patron; from the initial approach and interview, to the review interview, which must take place after the “time out” period has elapsed and before the patron will be permitted to return to the casino under the terms of the agreement [Refer Appendix A/2 – *Notes of Interview*].

Where this is not possible, the second authorised person (witness) who attended the first interview should ‘take ownership’ of the patron and conduct the second (review) interview.

The authorised person shall then make an assessment of the patron’s situation, including whether the patron believes they have a gambling problem, and what steps they have taken/are taking (if any) to resolve any perceived or actual problems. The authorised person shall make any other inquiries that they deem is necessary/appropriate in the circumstances.

The authorised person dealing with the patron shall then consider their options with regard to the matter, in accordance with approved procedures, including any restrictions, on going monitoring, self-barring and/or trespass.

Should the patron breach the mutually agreed “time out” period; they shall be requested to leave the casino premises as soon as this is discovered, and the matter reported to the Operations Manager and (if applicable) the authorised person dealing with the matter.

The patron shall be spoken to/interviewed regarding their return to the casino before the expiry of the agreed “time out” period.

The authorised person dealing with the patron shall then consider their options, in accordance with approved procedures, including resuming the “time out” period, extending the “time out” period, self-barring and/or trespass.

SELF – BARRING (SELF EXCLUSION)

Dunedin Casino will maintain a voluntary self-exclusion programme for patrons who make application to Dunedin Casino in the prescribed form.

Where a patron believes they have a gambling problem or are identified by casino staff as being a person who may have a gambling problem or are at risk of developing or otherwise having a gambling problem, they should be discreetly and confidentially afforded a “problem gambling pack”.

These are unmarked envelopes which contain various updated brochures, cards, and other problem gambling and contact information, including information from the *OASIS Centre for Problem Gambling (Salvation Army)*, the *Compulsive Gambling Society of NZ (Inc)*, and *Gamblers Anonymous*. There are free-phone contact numbers for these agencies, which include Asian Services (a special assistance service is available for Mandarin, Cantonese & Koreans), Maori (through the *Te Whanau o Waipareira* Trust) and Pacific Island Peoples (through *PIDAS*).

These “problem gambling packs” are held in the Security/Staff Entry Office. The problem gambling brochures, which include Dunedin Casino’s own problem gambling brochure (*We Can Help*) are also located in the casino’s brochure stands, both on the casino floor and in the casino foyer. Patrons can also be referred to these brochures by any casino staff including Security personnel.

The “problem gambling pack” also includes a *Self-Barring Notice*, which is the patron’s own, voluntary application to be self-barrred from the casino premises for an **indefinite period**. [Refer Appendix B/1 – *Application for Self-Barring Notice*].

Patrons may submit an application/notice to be self-barred from the casino premises in person or in writing.

Where at all possible, this function is to be co-ordinated by Security personnel. Where it is not, the matter should be forwarded to Security personnel for their immediate attention.

Self-barring applications should be referred to and co-ordinated by the Security & Surveillance Shift Manager or authorised person. Patrons seeking to self-bar themselves from the casino will be interviewed by the Security & Surveillance Shift Manager or authorised person, to ensure that the patron fully understands the implications and the requirements placed on him/her by self-barring.

The Self-Barring application/notice will include the applicant's details and wherever possible, the applicant should be encouraged to nominate their preferred counsellor/counselling service person or group and nominated third party (which may include their spouse, partner, relative or good friend).

The nominated third party may act as a representative and be a point of contact with regard to the self-barred patron. The casino may contact this person to discuss the applicant's treatment programme, any breaches of the self-barring notice or where an application has been made to rescind the self-barring notice. By nominating the third party, the patron authorises the casino to discuss matters that may arise with the third party, without breaching the Privacy Act 1993.

When the self-barring application/notice is complete, it is to be immediately forwarded to the Security Staff Entry Officer, who will ensure that the person's details are added to the Self-Barred list/database, which is then forwarded to all other relevant Departments for their attention eg Gaming and Surveillance.

The Self-Barring application/notice should also include a recent photograph of the applicant or, wherever possible, a photograph will be taken of the patron by Security personnel for the Self-Barred database/records. Dunedin Casino may hold this photograph for the purposes of identification.

The Self-Barring will be for an **indefinite period** and will remain in force until such time as the Operations Manager (or his nominated representative) and the applicant applying for the self-barring and his/her nominated third party (should one have been nominated) have agreed to rescind this notice.

Dunedin Casino reserves the right to enlist the services of a suitably qualified counsellor(s) in the field of problem gambling, to be involved in this process, should the need arise.

The applicant will acknowledge and agree that in spite of his/her application for Self-Barring, that should he/she succeed in gaining entry to the premises of Dunedin Casino, that Dunedin Casinos Limited and the operator of Dunedin Casino will not be held responsible for the consequences. The applicant will also acknowledge and agree that by signing the application form, that they absolve Dunedin Casinos Limited and the operator of Dunedin Casino from any legal liability that may ensue as a result of the applicant choosing to breach their Self-Barring Notice.

The applicant will acknowledge and agree that any violations of their Self-Barring Notice may result in the issuing of a Trespass Notice under the Trespass Act 1980, which may involve the Police.

The applicant will acknowledge and agree to waive confidentiality of the Notice (under the Privacy Act 1993), so that the Operations Manager (or his nominated representative) can discuss details pertaining to their application with their nominated third party and/or nominated counsellor(s) on an ongoing basis, until such time as the Notice has been rescinded.

The patron will be advised that they should not re-enter the casino premises after completing/submitting an application to be self-barred from the casino.

The completed Self-Barring forms are kept on file in the Security/Staff Entry Office and are to be viewed by all Security personnel.

APPLICATIONS TO RESCIND SELF-BARRING NOTICE

All patrons who wish to apply to have their Self-Barring Notice rescinded will be referred to the Operations Manager, who may delegate a nominated representative to deal with the application.

After speaking to the patron, the patron may be afforded the *Application to Rescind Self-Barring Notice*. [Refer Appendix B/2 – *Application to Rescind Self-Barring Notice*].

The Operations Manager (or his nominated representative) may refuse any application by any patron to rescind the Notice.

TRESPASSED PERSONS (EXCLUSIONS)

Where a patron refuses the option of electing to self-bar themselves from the casino premises, consideration will be given to trespassing the patron. [Refer Appendix C/1 – *Trespass Notice*].

The assessment will include all risk factors, including whether the patron poses a risk to themselves and/or the operator, and any legal issues that may arise as a result of the action or otherwise.

Each case will be assessed on its merits including the circumstances surrounding the patron, the patron's behaviour, and any incident(s) that have arisen.

In situations where self-barred patrons enter (or re-enter) the casino premises while they are self-barred, consideration shall be given to trespassing the patron. Undesirable persons or repeat offenders will be served with a Trespass Notice under the provisions of the Trespass Act 1980.

Wherever possible, these Trespass Notices will be served by the Security & Surveillance Shift Manager or authorised person at the time of the incident.

Where circumstances do not allow a written Trespass Notice to be served at the time, the Trespass Notice may be issued orally (under Section 5, Trespass Act 1980) or served on the person when they next attend the casino.

Trespass Notices may be issued for periods up to 24 months. Any breach of a Trespass Notice can result in Police action.

Where a person has been previously trespassed from the casino premises and is found either within the premises or attempting to enter the premises whilst the Trespass Notice is still current, it may be necessary to request Police attendance.

The Security and Surveillance Departments will maintain a photo/identification file of trespassed persons to enable them to detect such persons re-entering the Casino whilst they are the subject of such a Trespass Notice.

In a situation where a trespassed person is identified but leaves the premises before they can be approached by Security, then any available CCTV evidence with time/date stamp included may be given to Police, who may wish to proceed with a prosecution.

Similarly, when a trespassed person is identified and advised that they have committed an offence by re-entering the premises but refuse to await Police arrival, then it will be necessary to collect as much CCTV evidence of their presence on the premises as possible. This evidence along with Incident Reports can then be shown to Police.

All persons who are the subject of Trespass Notices under section 4 of the Trespass Act 1980, will have a personal file established containing details of the incident(s) or behaviour which caused them to be trespassed. Collating and maintaining these is the responsibility of the Security Staff Entry Officer. These files will be held in the Security/Staff Entry Office.

These files will include a photograph and detailed description of the person as well as a duplicate copy of the original Trespass Notice served on the person.

The files will be updated with details of any occurrences where the person has re-entered the casino before the expiry date of the Notice. All files of trespassed persons will be kept indefinitely even after the expiry of the Notice period to assist in identifying any of these persons who may re-offend.

GUIDELINES FOR MARKETING & ADVERTISING

All Dunedin Casino advertising will comply with the Advertising Standards Authority's Code for Advertising Gaming and Gambling. The Code is designed to ensure that advertising of gaming is conducted in a manner that is socially responsible and does not mislead or deceive the consumer.

In interpreting the Code, emphasis must be placed on the Principles and the spirit and intention of the Code. An advertisement, which does not adhere to the letter of a particular guideline, nevertheless may or may not be in breach of the Code, depending on its compliance with the Principles and respect of the spirit and intention of the Code.

The Principles of the Code are as follows:

Principle 1. Advertisements should comply with the laws of New Zealand.

Advertisements should comply with the age restriction for gambling as specified by the Casino Control Act 1990.

Principle 2. Advertisements should observe a high standard of social responsibility.

Guidelines:

2.1 Advertisements should not be directed at minors, have strong or evident appeal to minors, nor portray minors participating in activities in which they are under the legal age. Minors may appear in situations in which they would be naturally found (eg a family meal), provided there is no direct or implied suggestion that they will participate in gaming.

2.2 Advertisements should not promote reliance on gaming as a means of relieving a person's financial or personal difficulties.

2.3 Advertisements should not encourage consumers to participate excessively or beyond their means.

2.4 Advertisements should not state or imply a promise of winning nor portray unrealistic outcomes.

2.5 Advertisements should not exaggerate the connection between the gaming activity and the use to which the profits may be put.

Principle 3. Advertisements should not by implication, omission, ambiguity or exaggerated claim mislead or deceive or be likely to mislead or deceive consumers, abuse the trust of or exploit the lack of knowledge of consumers, exploit the superstitious or without justifiable reason play on fear.

Guidelines:

3.1 Winning claims should be factual and able to be proven. The chances of winning or the size of the prize should not be exaggerated.

3.2 Advertisements should not state or imply that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game.

BROCHURES, SIGNAGE & PUBLICATIONS

Brochures

Dunedin Casino has produced brochures aimed at deterring or at least minimising problem gambling. These brochures are not only designed to inform patrons of the harm associated with problem gambling, but also indicate treatment providers who are available for consultation [Refer Appendix E/1 – *Problem Gambling Brochure*].

Internal Signage

In addition to the brochures aimed at problem gambling, gaming machines display the 0800 Gambling Helpline telephone number and the “Bet With Your Head” slogan [Refer Appendix F/1 – *Gaming Machine Problem Gambling Hotline Stickers*].

Dunedin Casino has three signs (two in the public foyer, ground floor, and one situated at the top of the stairs, casino floor, level one) that include entry restrictions. Age, dress and behaviour standards include reasons why persons may be refused entry to Dunedin Casino, or be requested to leave the casino premises. Dunedin Casino is committed to both complying with legal requirements and maintaining high behavioural standards to meet community expectations [Refer Appendix D/1 – *Signage*].

External Signage

Dunedin Casino will seek permission and comply with all relevant Local Body regulations in relation to external signage, and will comply with any requests by the Casino Control Authority in relation to exterior casino signage.

Conduct of Promotions & Inducements to Gamble

Dunedin Casino conducts promotions from time to time to support food and beverage and gaming operations. These promotions are conducted in accordance with the Gazetted Rules for Casino promotions. Every endeavour is made to ensure that these promotions do not encourage persons currently self-barred or possible problem gamblers.

Community Service Organisations

Dunedin Casino has established links with selected community organisations dealing with the treatment of problem gamblers. Dunedin Casino will endeavour to work closely with those organisations and where appropriate, family members and nominated third parties of patrons with gambling problems.

Reporting to the Casino Control Authority

The Casino Control Authority may request that Dunedin Casino report on the operation of the Responsible Gambling Programme. In such a situation Dunedin Casino will comply with any request in a manner consistent with that request.

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