

Harm Minimisation Policy & Guidelines



The Napier Returned and Services' Association



Approval of the Board

This document became policy and into effect after the Napier Returned Service Association Board Meeting held on _____ Day of _____ 2007.

John Purcell (President)

Craig Williams (CEO)

Policy Statement - Key Objective

The Napier Returned Service Association is committed to promoting responsible gambling and minimizing harm that is desirable in terms of the values of the community, within customer's expectations, good business practices and within the guidelines of the legislation.

The Napier Returned Service Association will support and promote proven harm minimisation methods, techniques and solutions to assist any person(s) who feels they may have an actual or potential to be harmed by gambling.

The Napier Returned Service Association operates a transparent approach of all gambling activities and fosters a working relationship that is sensitive to the multicultural needs and diversity within the community

Notwithstanding Napier Returned Service Association and those within the network of gambling operations will operate within the legislative framework to implement Harm Prevention, Minimisation and Enforcement with ongoing training and support systems to assist employees and problem or potential problem gamblers

Identifying Problem Gamblers

A problem gambler is a person "who's gambling causes harm or may cause harm" (Gambling Act, 2003)

Napier Returned Service Association Venue Operators and employees are required by law to identify actual or potential problem gamblers. Venues will identify a problem gambler when the evidence of harm or potential harm is made known by that persons gambling behaviour.

When the link is apparent that that persons behaviour is causing harm or may cause harm we may/will identify that person concerned as a problem gambler and will take all reasonable steps as necessary to offer that person information and assistance.

The 'Problem Gambler Identification Policy' advise all players that if they (the staff) believe any player is experiencing Harm or Potential Harm in relation to their gambling they (the staff) are required by law to approach.

The 'Problem Gambler Identification Policy' also advise players that if they are in need of any assistance in respect of problem or potential problem gambling they should ask the Gambling/Duty Manager.

Copies of the 'Problem Gambler Identification Policy' are available on request.

Fiduciary Responsibilities

Regulation 12 of the Gambling (Harm prevention and Minimisation) Regulations 2004 provides part of a regulatory framework for preventing and minimizing harm.

In order for Harm Prevention and Minimisation to be effective it must be consistent with other related requirements which are contained in the ACT, Regulations, licensing criteria, license conditions, game rules and minimum standards.

The Napier Returned Service Association, Venue Operator(s) and Employees within these gambling operations have been trained and will operate within the legislative framework which includes:

- how each venue will minimise risk of underage gambling at the class 4 venue
- how each venue will prevent access to gaming machine by underage gamblers
- approach a player that they have reasonable grounds to believe is experiencing difficulties related to gambling
- provide information about the characteristics of problem gambling including the recognized signs of problem gambling
- provide information to a player about the risk and consequence of problem gambling
- provide information how to access problem gambling services
- advise the player that the venue manager may identify a person that they have reasonable grounds to believe is a problem gambler and can ban the player from the gambling area of the venue for up to two years
- remind a player that they can identify themselves as a problem gambler and request that the venue manager exclude them from the gambling area of the venue for up to two years
- provide signage, brochures and publications at the entrance of and inside the gaming area encourage players to gamble responsibly
- ensure that no inducements to play gaming machines are offered by the Corporate Society, Venue Operator, Employees or any other person
- approach a player based on evidence of the 'Problem Gambler Identification Policy ' with the view too assist with information and or assistance which may include:
 - *the sites self exclusion procedure*
 - *maintain a register of any incident*
 - *the completion of all forms, signed off by the proper authority and filed as per Napier Returned Service Association enterprise procedures*

Gaming Operations & Management

Key Persons/Gambling Manager

Section 12 of the Gambling Act 2003 requires that a key person/gambling manager, who is suitably trained, is on duty at all times gaming machine are available to be played. For ease and consistency of daily operations and management the Key Person is hereinafter deemed to be the 'Duty Manager'.

Notwithstanding all Staff at this Venue are aware of the existence of Host Responsibility with reference to Harm Prevention, Minimisation and Enforcement and will listen to any patrons request for assistance with respect and patience and explain the need to refer the matter to the Key Person/Duty Manager/Gambling Manager.

On Site Observations

Regular checks by staff and the gambling manager is made through the gaming area as part of the Napier Returned Service Association 'On Site Observations' policy for potential problem gamblers, self excluded or excluded gamblers and underage gamblers

Procedure to minimise the risk of Under-Age Gamblers

At the entrances to and from the inside of the venue, adequate signage will be displayed prohibiting under-age gambling.

While it is not a requirement to ask for evidence of age for all gamblers, all venue personnel will insist on evidence of age documents from all gamblers they believe may be under the age of 25 years before or during any gambling activity or any payment/prize is made.

Evidence of age document that will be accepted by venue personnel is:

- Valid Passport
- New Zealand Photo Drivers License
- HANZ 18+ Card

If a player does not have suitable evidence of age documents they will be given 7 days to prove to the satisfaction of the Venue Operator/Gambling Manager they over the age of 18 and are eligible to claim any prize won.

Any prize money not claimed will be banked as required as per 'The Game Rules 2006'.

Section 307 of the Gambling Act 2003 Sect 3 states 'The holder of a Class 4 Venue License need not give any reason to deny entry or request a person leave a venue.

The Venue Manager or the person acting on behalf of the Licensee shall insist any suspected or proven under-age person leave the venue immediately and will offer the following information and assistance.

- **Preprinted notice of section 307 of the Gambling Act 2003**
- **An information brochure for free information and advise from a Service Provider**

Venue Specific Guidelines to Minimise Harm – Section 65(2)(d) Gambling Act 2003

The Napier Returned Service Association, Venue Operator(s) and Employees will minimise risk at their Venue under Section 65 (2) (d) of the Gambling Act 2003 by regularly and diligently monitoring the venue for underage gamblers, excluded gamblers and actual or potential problem gamblers.

- 1. Primary Business (Type of Business and principal income)**
- 2. Venue Layout (Floor Plan)**
- 3. Staffing (Key Persons/Gambling Manager and all General Staff involved in gaming)**
- 4. Security (Good quality, functioning and continuously monitored CCTV , Security Personal)**
- 5. Monitored Access/Egress to Gaming Area (Through or past main work area)**
- 6. Monitoring Gaming Machines (Visibility from main bar or work area)**
- 7. Statutory means of Restrict access to minors (Liquor Licence)**
- 8. Supervision of Gaming Room (Full time placement of person in gaming room)**

DISCLAIMER NOTE: It should be noted that as each individual venue is different some of the guidelines above may not pertain to the specific venue when its policy is written.

Building the Evidence of Harm or Potential Harm

All staff at each venue are aware of the limitations in observational data (underage gamblers excluded) as may be experienced by first impressions.

Evidence is gathered over a period of time which includes:

- a person's gambling behavior
- Self disclosure by the patron that he/she is a problem gambler and has suffered harm or that his/hers gambling has caused others harm. Such disclosure may be full, partial or veiled.
- Self Exclusion and Exclusion orders are an option for dealing with problem gamblers.
- Second party suffering includes an unattended minor suffering harm, e.g. a child left in a vehicle while the parent(s) owner(s) driver(s) is/are gambling at the venue
- Third party suffering from evidence supplied by a family member or significant other that harm has been caused by that persons gambling

The key to effective Harm Prevention and Minimisation as practiced by each venue and in conjunction with observations is by 'Talking To and Knowing' customers, notating in the Incident Register what may appear a series of unrelated incidents that when pieced together could assist in identifying if a person is experiencing a problem related to gambling.

All staff at this venue recognises that a person can only be diagnosed as a problem gambler by a qualified person

Venue observations

Venue Staff are required to record any gambling behaviour that causes them concern in the Incident Register for assessment by the Gambling Manager.

Staff concerns may include (but not limited to) the following:

- Patron requests credit
- Patron has long session of play
- Patron is intoxicated playing machines
- Patron plays two or more machines
- Patron exhibits disorderly behaviour
- Patron repeatedly cashes cheques
- Patron is distressed
- Patron causes damage to gaming machine
- Patron has extreme mood swings
- Patron attempts to borrow money to gamble
- Patron has arguments with employees or other patrons
- Patron makes verbal statement relating to harm or potential harm from gambling
- Patron refuses to leave machine for toileting requirements
- Patron unaware of time spent gambling
- Patron attempts to sell personal effects to continue to gamble

Approach

The Venue Manager/Gambling Manager from the weight of evidence received or documented will approach the person they believe is being harmed by problem or potential problem gambling.

The venues template for approaching a problem gambler (but not limited to) includes:

- Never approaching or arranging a meeting with an underage person without a witness present
- When communicating with a patron either written or verbal Venue Operators/Gambling managers do not make any judgment statements
- Venues Operators/Gambling Managers encourage Self Exclusion as opposed to other types
- Advise the player that an exclusion is not designed as a means of punishment
- Advise a player that they can be excluded from the Venue for a period not exceeding 2 years

Because New Zealand is a multi-cultural society, venues operators and employees are trained to work with people from different cultures

Enterprise Procedures (House Rules)

- Persons who are employed at any Napier Returned Service Association Class 4 Venue will sign the venue policy "FOR STAFF PLAYING THE GAMING MACHINES"
- The Gambling Manager(s) who are employed at any Napier Returned Service Association Class 4 Venue are required to familiarise themselves with events prior to the commencement of their shifts. This includes incident registers, staff notice boards and diary notes for excluded persons.
- The Gambling Manager(s) who are employed at any Napier Returned Service Association Class 4 Venue are required to make regular checks in the Class 4 Venue where gambling is conducted and complete the Incident Register as required
- All persons who are employed at any Napier Returned Service Association Class 4 Venue and directly involved with Gaming Operations have completed/or are required to complete a Harm Minimisation Training Course recognised by N.Z.Q.A.
- All persons who are employed at any Napier Returned Service Association Class 4 Venue and are directly involved in Gaming Operations share equally in encouraging Gamblers to gamble responsibly which includes gathering evidence through observation and talking to and getting to know their patrons and completing all paper work/forms as required to assist with meeting the legislative requirements
- All persons who are employed at any Napier Returned Service Association Class 4 Venue and are directly involved in Gaming Operations share equally in ensuring regular checks of the venue to maintain signage, brochures, Age Restriction signage, Odds of Winning information, Complaints Procedures and the Problem Gambler Identification policies are clearly visible to all players.
- All persons who are employed at any Napier Returned Service Association Class 4 Venue and are directly involved in Gaming Operations share equally the responsibility of ensuring that copies of the 'Problem Gambling and Harm Minimisation Policy' is available on request to patrons and they also are aware of the patrons rights and can advise them of the 'Complaints Procedures' if required.

Resource Material

As part of this Venues Commitment to the Napier Returned Service Association and Legislative requirements the following templates have been generated to assist with the day to day management of Gambling Operations

- Incident Register/Evidence Record
- Gaming Venue Player Check Schedule
- Deny Entry/Required to leave - Section 307 Gambling Act 2003
- Venue Exclusion Order - Section 308 Gambling Act 2003
- Self Exclusion Order - Section 310 Gambling Act 2003
- Player Withheld Payment template
- Third Party Approach template
- Record of Meeting with Patron Template
- Gaming Venue Signage & Information checklist Template
- Evidence of Age requirements
- Problem Gambling Identification Policy
- Complaints Procedures
- Record of Learning

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Venue Resources

- Each venue shall display information leaflets to assist people who may be problem gamblers as to where they may seek help. Leaflets, Brochures and publications are readily available in the gaming area.
- Each gaming machine will have a Gambling Helpline sign affixed in a prominent place with clear visibility to the player.
- Each venue will display "R18" signage at each entrance to and within the gaming area.
- Each gaming machine will have an R18 sign affixed in a prominent place with clear visibility to the player.
- All gaming machines will only accept bank notes up to a maximum of \$20 denomination.
- Each venue will actively ensure the protection of minors from accessing gaming machines by enforcing the venue's license conditions and restricting access to the gaming area by minors.
- Where access to the gaming area may be obscured for whatever reason, venue staff will check the gaming area to ensure minors are not present.
- Where a suspected underage person is discovered in the gaming area, venue managers will conduct a meeting with the suspected underage gambler using the "Record of Meeting with Suspected Underage Gambler" forms.
- Each venue manager will exclude any player suspected of or showing signs of having a gambling problem. The venue manager will maintain a register of excluded players and update the corporate society as this register is amended.
- Each venue manager will refer any problem gamblers identified to an appropriate counseling agency for information and assistance.
- CCTV cameras and monitoring equipment will be used at all venues for the observation and recording of suspected problem gamblers. This information may then be used to assist suspected problem gamblers seek help and counseling as required.

Host Responsibility Staff Resource Kit

Salamander Systems Ltd 'Harm Minimisation' Resource Manual and Templates

Training

The Napier Returned Service Association, Venue Operator(s) and Employee(s) are committed to ensuring a safe gaming environment for their patrons that meets the legislative requirements in respect of Harm Prevention, Minimisation and Enforcement.

The Napier Returned Service Association and the Venue Operator(s) have a system of controls and training mechanisms in place to meet the training needs of new personnel and the ongoing and updating requirements to existing employees.

All training is monitored at venue level and is documented in the Record of Learning template

All personnel at this Venue are/or will be trained to N.Z.Q.A. Unit Standards:

Unit 21499: Demonstrate knowledge of Problem Gambling in a Class 4 Gambling environment

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