



**OTOROHANGA CLUB INCORPORATED
HARM PREVENTION AND MINIMISATION POLICY**

INTRODUCTION

Otorohanga Club recognises the harm that gambling can bring to the community and aims to prevent and minimise the harm by having this policy in place in accordance with the regulations of the Gambling Act 2003 and Gambling (Harm Prevention and Minimisation) Regulations 2004.

POLICY OBJECTIVE

The objective of this policy is:

- a) To meet all requirements of the Gambling Act 2003 and;
- b) To meet all requirements of the Gambling (Harm Prevention and Minimisation) Regulations 2004

The Otorohanga Club will acknowledge the responsibilities of this policy by:

- a) Preventing and minimising the harm caused by gambling, including problem gambling
- b) Ensuring all staff are trained to recognise the signs of problem gambling and are confident to engage and respond to incidents involving problem gambling
- c) Minimising the risks of problem gambling by providing a safe environment
- d) Maintaining records of interaction and observation of possible problem gamblers through daily sweep records, harm minimisation incident forms that are reviewed by venue manager
- e) Minimising the risk of problem gambling and underage gambling

PROBLEM GAMBLER IDENTIFICATION

Section 3 of the Gambling Act 2003 provides the following definitions:

A problem gambler means 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) by the person's spouse, civil union partner, de facto partner, family, whanau, or wider community; or
 - (iii) in the workplace; or
 - (iv) by society at large

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.

1. MONITORING FOR SIGNS OF HARM

1.1. SIGNS OF HARM

The Harm Minimisation Regulations contain a schedule of 7 signs of harm. These are not listed in any order of importance and are all important indicators of players showing signs of gambling harm.

7 SIGNS OF HARM
<ul style="list-style-type: none"> ● Withdrawing or attempting to withdraw cash from an automatic teller machine (“ATM”) or EFTPOS device on two or more occasions in one day to use for gambling at the venue ● Gambling during 9 or more consecutive gambling area sweeps ● Attempting to borrow money from staff or other venue customers to use for gambling ● Leaving children in a car or otherwise unattended at the venue ● Waiting to gamble as soon as the venue opens ● Refusing to stop gambling at the venue when the venue is closing, or otherwise appearing unable to stop gambling ● Appearing visibly distressed or angry either during or after gambling (for example crying, holding their head in their hands, or hitting a machine).

OTHER SIGNS OF HARM	
<p>Length of play</p> <ul style="list-style-type: none"> ● Gambles for long periods (three or more hours) without taking a break ● Gambles most days ● Finds it difficult to stop at closing time ● Waiting to gamble as soon as the venue opens ● Gambles from opening to closing <p>Money</p> <ul style="list-style-type: none"> ● Puts large wins straight back into the machine ● Tries to withdraw money two or more times ● EFTPOS/ATM repeatedly declined * ● Leaves venue to find more money to gamble ● Tries to borrow money from others in the venue or gambling room or personnel <p>Other</p> <ul style="list-style-type: none"> ● Appearance or hygiene deteriorates significantly ● Leaves children in car while gambling ● Friends or family raise concerns about the gambler 	<p>Behaviour during play</p> <ul style="list-style-type: none"> ● Becomes angry at or stands over other players ● Rude to other gamblers or personnel ● Complains to personnel about losing ● 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) ● Has gambling rituals or superstitions (rubbing, talking to machine) ● Gambler tells personnel that gambling is causing them problems ● Shows frustration (grunting, groaning, playing roughly) ● Shows some signs of distress (looks depressed, sweating, nervous/edgy) ● Shows obvious signs of distress (crying, holding head in hands, shaking) ● Anger - Has an angry outburst towards personnel, others in the gambling room or at the machine (shouting/ swearing, kicking/hitting machine) ● Goes out of their way to avoid being seen at the venue (including asking personnel to not let others know they are there)

Staff will receive training so that they have the understanding to be able to recognise the 7 signs of harm, as well as being familiar with the other recognised signs of gambling harm.

1.2 GAMBLING AREA SWEEPS

A gambling area sweep is a physical observation of a place where gaming machines are located in a class 4 venue to observe player behaviour and look for signs of harm.

Gambling area sweeps will be carried out at least 3 times per hour while the venue is open, and venue staff will take all reasonable steps, when carrying out a gambling area sweep, to identify whether a player has been present during 9 or more consecutive gambling area sweeps.

- All gaming machines are located in a separate, defined area.
- A gambling area sweep means the physical observation of a place where gaming machines are located.
- The gaming area is under frequent supervision by the venue staff. Sweeps of the gambling area are conducted at least three times per hour while the gambling area is operating, with each sweep being at least 10 minutes after the previous sweep.

When a player is first observed during a sweep of the gambling area, staff note an identifying feature of the person in the sweep records. This could be their name, membership number, nickname, or some other unique feature sufficient for staff to identify that person in subsequent sweeps. For example, a particular item of clothing may be noted.

When conducting a sweep, the club staff must take all reasonable steps to:

- Record at each sweep, the name of the player, what machine they are playing, the time of the sweep, the staff name of who did the sweep.
- Observe player behaviour, and
- Monitor for signs of harm, and
- Identify whether any player has been gambling during nine or more consecutive sweeps
- When a player has been noted as present for 9 consecutive sweeps, staff will have a conversation with the player

Sweeps are not required if gaming machines are turned off, or a gaming area is closed.

1.3 MONITORING AND RESPONDING TO SIGNS OF HARM

The venue manager will ensure staff consider whether any player is showing any signs of harm as described in signs of harm.

Staff will take the time to greet players and take any opportunity to chat with players, particularly if they are new. Staff will take the time to get to know players and establish a rapport with them by having regular communication with them.

Brochures and notices are displayed in the gaming area and are clearly visible to players. The brochures and notices inform players about the dangers of gambling, encourage players not to spend more than they can afford, and set out information on assistance for gambling problems.

The brochures include information about the odds of winning, such as “You might sometimes have a win but, if you keep playing, you are likely to lose all the money you put in”. The brochures also include information on the characteristics of problem gambling (including recognised signs of problem gambling).

The notices include a statement that the Club has a problem gambling policy and that a copy of the policy is available on request.

Staff will keep records of ATM and/or EFTPOS transactions where they see a customer go from withdrawing cash to entering the gambling area. Where someone withdraws twice for gambling from the ATM, and on every subsequent withdrawal, staff should have a conversation to determine if the gambling may be causing the player harm.

Records of the conversation will be recorded on the Harm Minimisation Incident and Intervention Record form, these will be reviewed by the venue manager or a person acting on the managers behalf within 7 days of the incident recorded.

1.4 CONVERSATION

Each time a staff member observes a player exhibiting one or more signs of harm, they must have a conversation with the player to assist with identifying whether the player is a problem gambler.

The staff will advise the venue manager of the conversation and a record of the conversation will be recorded on the Harm Minimisation Incident and Intervention Record form that the venue manager, or person acting on their behalf, will review within 7 days of the incident.

If the initial conversation with a player raises concerns, or the player is subsequently observed showing further signs of harm, or having reviewed the records the venue manager has reason to believe the player is a problem gambler, the venue manager or person acting on their behalf should approach the player in order to conduct a formal intervention, however, at any time, club staff may provide information to players about problem gambling if they consider it will reduce harm.

The venue manager or person acting on their behalf should approach the player in a polite manner and ask to speak to them privately, in a separate area away from the gaming machines. The player should at all times be treated with respect, sensitivity and a willingness to help. The venue manager or person acting on their behalf should then:

- Offer information or advice to the person about problem gambling, and
- 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 club to exclude them from the gambling area for up to two years, and
 - Management has the right to identify a person they believe is a problem gambler and exclude them from the gambling area for up to two years.

1.5 EXCLUSION ORDER MAY BE ISSUED TO PROBLEM GAMBLER

- The venue manager or the person acting on their behalf must, after identifying a problem gambler, approach the person and offer information or advice to the person about problem gambling.
- The person should at all times be treated with respect, sensitivity and a willingness to help. The venue manager will then:
 - Provide information to the player about the characteristics of problem gambling, including recognised signs of problem gambling
 - Advise the player of the potential dangers of problem gambling
 - Tell the player how to access problem gambling services, for example:

Organisation	Telephone Number	Website
Gambling Helpline	0800 654 655	gamblinghelpline.co.nz
Gambling Text 4 Help	Text 8006	safergambling.org.nz
PGF Services	0800 664 262	www.pgf.nz
Safer Gambling Aotearoa	0800 654 655	safergambling.org.nz
Mapu Maia	0800 21 21 22	www.mapumaia.nz

2. RECORD KEEPING AND REVIEW

2.1 KEEPING RECORDS OF SWEEPS

Sweep records will be completed at least three times per hour, at 10 to 15 minute intervals.

For each gambling area sweep the following information must be recorded:

- The name or ID of the staff member who conducted the sweep, and
- The date and time that the staff member conducted the sweep, and
- How many players were present in the gambling area during the sweep, and
- When conducting a gambling sweep, take all reasonable steps to identify whether any player has been gambling during 9 or more consecutive gambling area sweeps, and
- Evidence of the steps taken by the staff member to monitor and identify whether players have been gambling during consecutive gambling area sweeps, and
- If a gambling area sweep was not conducted because the gambling area was unoccupied, the staff member must record:
 - The method by which the staff member verified that the gambling area was unoccupied, and
 - The date and time that the gambling area sweep was not conducted.

Sweeps and records are not required when gambling is not operating. This is when the gaming area is closed, the club is closed, or machines are turned off.

The venue manager, or the person acting on behalf of the venue manager, will review the records for at least the previous seven days at least once each week.

The venue operator will ensure that records are kept for at least three years after the date on which they were recorded.

2.2 KEEPING RECORDS OF SIGNS OF HARM AND CONVERSATIONS

Staff will record any identified signs of harm. Recording of signs of harm observed in players can be recorded outside of sweep times.

When a sign of harm is identified, the following information must be recorded:

- The name of the staff member who identified the sign of harm, and
- The date and time that the staff member identified the sign of harm, and
- Information that would help club staff to identify the player who displayed the sign of harm (for example, their name, membership number or a general description of the player), and
- Which sign of harm was identified, and
- The name of the staff member who had the conversation with the player to assist with identifying whether the player is a problem gambler, and
- The date and time that the staff member had the conversation with the player, and
- A summary of the conversation with the player, and
- Any further action taken in respect of the player.

Signs of harm and conversations will be recorded on the Harm Minimisation Incident and Intervention Record form.

The venue manager, or the person acting on behalf of the venue manager, will review the records for at least the previous seven days at least once each week.

The venue operator will ensure that records are kept for at least three years after the date on which they were recorded.

2.3 REVIEWING THE RECORDS

The venue manager, or someone acting on their behalf, is required to review the records at least once a week, for at least the previous seven days.

The records to be reviewed include the records of:

- All sweeps conducted by staff
- Signs of harm identified in players by staff, and
- the conversation staff have with players, and their outcomes or decisions

The review checks are to:

- Assess whether the club staff have taken appropriate action following the identification of one or more signs of harm in a player, and
- Assess whether further action is required in respect of a player, and
- Determine whether there are any players whom the venue manager, or the person acting on their behalf, has reasonable grounds to believe are problem gamblers.

On reviewing records, the venue manager should be considering the following:

- Are the clubs' systems working as intended and being consistently applied?
- Are club staff detecting signs of harm and having helpful conversations with players to ensure that any further harm is minimised?
- Are club staff keeping good summaries of their conversations which meet all the requirements?
- Are club staff providing helpful resources and information to players?
- Are club staff taking appropriate action in respect of a player?
- Does the venue manager have reasonable grounds to believe any player is a problem gambler?
- Are club staff demonstrating that they are well trained?

The venue manager, or the person acting on their behalf, after reviewing the records will record the following:

- The date of the review
- Any further action taken as a result of the review

2.4 RETAINING RECORDS

The purpose of retaining records is that it forms part of the procedure for identifying problem gamblers and enables checks to be carried out to review how the procedure has been implemented.

The venue operator will ensure that the following information recorded is kept for three years:

- Records of gambling area sweeps
- Records of information in relation to each sign of harm identified
- Records of the venue manager review, and
- Records of the date of the venue manager review and any further action taken as a result of the review

These records do not need to be kept on site at the Otorohanga Club, but they must be accessible within 10 days of being requested by The Department of Internal Affairs.

2.5 RECORDS OF CURRENT EXCLUSION ORDERS

In relation to each person excluded from the venue, a record is kept in the Gaming Compliance Folder, behind the bar for venue staff reference. The information recorded includes:

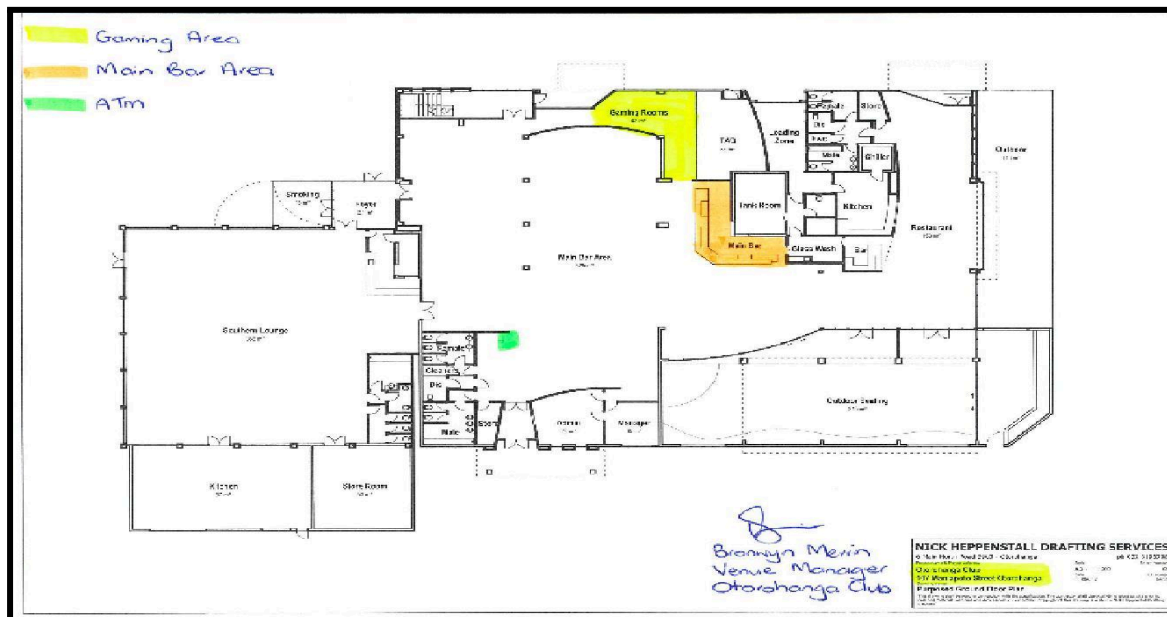
- The persons name and date of birth
- If the person was excluded from the venue under section 309 or 310 of the Gambling Act 2003
- The date on which the exclusion order was issued and the date of its expiry
- Any conditions imposed on the persons re-entry to the venue

3. VENUE DESIGN

3.1 ATM MUST BE IN LINE OF SIGHT

The ATM is in line of sight of staff at the main bar area, making it easier for staff to monitor players who are using the ATM to withdraw cash for gambling.

Staff have a physical view of the ATM when they are standing or working at their usual place at the bar. The ATM is situated outside of the gaming room as shown on the floor plan below.



3.2 VISIBILITY OF GAMING MACHINES

Gaming machines must not be visible from outside the boundaries of the venue. Visibility of gaming machines includes any part of the gaming machine, or any lights coming from the gaming machines.

3.3 JACKPOT BRANDING, ADVERTISING, AND PROBLEM GAMBLING INFORMATION

Advertising relating to jackpots will not be published or displayed in such a way that it is visible or can be heard from outside the venue, additionally the word 'jackpot' or similar words will not be used by the club in published advertising.

Pamphlets are freely available to players, providing information about the odds of winning on gaming machines, including the recognised signs of problem gambling, and how to seek advice for problem gambling.

Signage is displayed in the club that is clearly visible to all players encouraging players to only gamble at levels they can afford and contains advice about how to seek assistance for problem gambling.

All gaming machines include Player Information Displays that include information about the game, the player's session of play and the accurate time.

4. PROBLEM GAMBLING AWARENESS

4.1 TRAINING

All club staff who supervise gambling in the course of their duties will receive Problem Gambling Awareness Training before they commence supervising class 4 gambling. Staff will do refresher training at least once per year.

A staff member who has received problem gambling awareness training will be present at the club at all times that gambling activities are available to players.

The training will include practical and interactive sessions that meet all requirements under Regulation 13 (3) of the Gambling (Harm Prevention and Minimisation) Regulations 2004 to ensure that staff can meet the regulations and following requirements:

- Information about identifying the signs of harm
- Basic information about how gaming machines work, including why they can be addictive
- First-hand accounts (which may be pre-recorded) from people who have experienced or been affected by harm
- Information about the types of harm
- Information about local and national problem gambling services and other organisations that can provide support to people affected by harm
- The procedure for self-exclusion and venue-initiated exclusion, including when it is appropriate for the venue manager or person acting on their behalf to consider excluding an individual
- Monitor and identify signs of harm, including through conducting sweeps
- Approach a player whom the venue manager or the Club staff have reasonable grounds to believe may be experiencing difficulties relating to gambling,
- Provide information to a player about the characteristics of problem gambling (including recognised signs of problem gambling),
- Provide information to a player about the potential dangers of problem gambling
- Provide information to a player about how to access problem gambling services
- Remind a player that the venue manager or a person acting on the manager's behalf may identify a person they have reasonable grounds to believe is a problem gambler and exclude the player from the gambling area of the Club for up to two years, and

- Remind a player that they can identify themselves as a problem gambler and request that the venue manager or a person acting on the manager's behalf exclude them from the gambling area of the Club for up to two years.

4.2 PROVIDING CREDIT FOR GAMBLING PROHIBITED

- Credit is not provided by the venue.
- Cashout requests are not taken from credit cards.
- Staff will monitor to ensure a person conducting gambling must not offer or provide credit if the person knows or ought to know that the credit is intended to be used for gambling.

5. EXCLUSION ORDERS

The venue manager, or the person acting on behalf of the venue manager, must take reasonable steps to assist a person including, if appropriate, issuing the person with an exclusion order.

- If the person has already been approached, and provided with information or advice about problem gambling
- The person has not requested to be issued with an exclusion order
- The venue manager, or the person acting on behalf of the venue manager, has reasonable grounds to believe that the person is displaying signs of problem gambling or other behaviour.
- The venue manager, or a person acting on behalf of the venue manager, may, after offering advice or information to a problem gambler, issue an exclusion order to that person that prohibits the person from entering the gambling area of the class 4 venue for a period of up to 2 years

5.1 SELF AND VENUE INITIATED EXCLUSIONS

- Exclusion orders must be issued promptly to self-identified problem gamblers. The exclusion order forms are kept in the Gaming Compliance Folder behind the bar
- In addition to the above, the venue manager, or a person acting on behalf of the venue manager, may, after offering advice or information to a player who is an actual or potential problem gambler, issue an exclusion order to the player.
- The venue manager, or person acting on behalf of the venue manager, has a duty to assist a gambler if ongoing concern exists. If a player is approached and provided with information or advice, the person will continue to be monitored by club staff. If the player's ongoing gambling or other behaviour is such that there are reasonable

grounds to believe the player is a problem gambler, the player will be approached again and provided further information about problem gambling and, if appropriate, issued with an exclusion order.

- Only the venue manager, or person acting on behalf of the venue manager, may issue exclusion orders. However, if a person requests to be excluded, the self-exclusion request should be actioned immediately by the most senior member of staff at the Club, if the venue manager is not immediately available. The venue manager gives their authorisation for self-exclusion requests to be actioned by other Club staff.
- Unless the venue manager has good reason to issue an exclusion order for a lesser period, the exclusion period specified in the order will be a minimum of three months. Once issued, the exclusion order cannot be revoked, rescinded, or withdrawn.
- The venue manager, or person acting on behalf of the venue manager, may refuse to issue an exclusion order if the person requesting the exclusion 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
- It is also permissible to refuse to issue an exclusion order if the photograph provided is of poor quality.
- Club staff must monitor for and 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 \$5,000.00.

5.2 MULTI VENUE EXCLUSIONS (MVE)

- When a multi-venue exclusion order request is received (an MVE request), the venue manager (or person authorised by the venue manager) should immediately:
 - Complete an exclusion order (the MVE request is not itself an exclusion order);
 - Return the exclusion order to the MVE coordinator.
 - Advise the staff of the new exclusion; and
 - Retain a copy of the exclusion order at the Club.
 - This MVE process may be automated via the Person of Interest functionality in the QEC terminal.
 - This MVE process may also be automated directly via the CONCERN database. The venue manager, or person acting on behalf of the venue manager, logs into CONCERN and approves the exclusion request. Upon approval, a system generated exclusion order is emailed out to the National MVE Administration Service. The National MVE Administrator then provides the excluded person with a copy of the exclusion order via email or post.

5.3 MONITORING FOR EXCLUDED PERSONS FROM GAMBLING AREA

An exclusion list of persons excluded from the gambling area is readily accessible for venue staff to access. When updates or expiry of exclusion orders are added the venue manager, or person acting on their behalf, will update the exclusion folder and ensure all venue staff are notified of the update to excluded persons.

Excluded persons are not permitted to enter the gambling area and must be removed if they do so.

POLICY FOR MINIMISING RISK OF UNDERAGE GAMBLING

- All gaming machines are located in a separate, defined area of the venue
- Persons participating in gambling must be at least 18 years old
- Any individual who looks 25 years of age or under that enters the gaming area will be requested by staff to show evidence of age. The evidence of age documents that are acceptable are:
 - Valid, current Passport
 - New Zealand (photo) Drivers Licence
 - Kiwi Access Card (18+)
- Any person who fails or refuses to provide evidence of age documents will be asked to leave the gaming area immediately and not re-enter the gaming area
- Prize money will not be paid to any person who looks under 25 years of age and refuses to produce photo identification confirming that they are 18 years of age or older. The prize money will be held along with details of the individual's name. Address, and the date the prize was won. The prize money will be held for seven days and paid to the individual if approved evidence of age documentation is provided confirming that the individual is 18 years or older. If suitable identification is not provided within seven days, then the funds will be banked into the clubs gaming account.

LEGAL RESPONSIBILITIES

List of infringement offences under the Gambling Act 2003 and the Harm Minimisation Regulations relevant to harm minimisation for class 4 gambling.

Act/Reg	Offence	Liabile Party	Fee (\$NZ)
Reg 5 (a)	Failure of venue operator to ensure that gaming machines in an area permitted for class 4 gambling under a licence condition are not visible from outside the venue (except intermittently when an external door is in use)	Venue operator	\$1,000
Reg 9	Failure of holder of class 4 licence or venue operator to comply with restrictions on jackpot advertising at class 4 venue	Licence holder or venue operator	\$1,000
Reg 10	Failure of holder of class 4 licence or venue operator to comply with restrictions on jackpot advertising at class 4 venue	Licence holder or venue operator	\$1,000
Reg 11	Failure of holder of class 4 licence to provide	Licence holder	\$1,000

	information about problem gambling to players at class 4 venue		
Reg 13 (1)	Failure of holder of class 4 licence to provide problem gambling awareness training to venue manager and venue personnel who supervise gambling— (a) before venue manager and venue personnel begin supervising gambling in the course of their duties at the venue; or (b) at least once a year	Licence holder	\$1,000
Reg 13 (3)	Failure of holder of class 4 licence to provide problem gambling awareness training that includes components required by regulation 13(3)	Licence holder	\$1,000
Reg 14	Failure of venue manager to ensure that venue personnel undertake gambling area sweeps	Venue manager	\$1,000
Reg 15 (2)	Failure of venue manager to ensure that venue personnel have conversations with players who have exhibited 1 or more signs of harm	Venue manager	\$1,000
Reg 16 (2)	Failure of venue manager to ensure that venue personnel record required information in relation to gambling area sweeps	Venue manager	\$1,000
Reg 16 (3)	Failure of venue manager to ensure that venue personnel record required information in relation to identified signs of harm	Venue manager	\$1,000
Reg 14 (4)	Failure of venue manager to review records, or ensure other person reviews records, for at least the previous 7 days at least once each week	Venue manager	\$1,000
Reg 16 (6)	Failure of venue operator to ensure that records are kept for at least 3 years after the date on which they were recorded.	Venue operator	\$1,000
S84 (1) GA	Prohibition on gaming machines that accept over \$20	Licence holder	\$5,000
S302 (1) GA	Restriction on class 4 gambling under 18 years	Player, venue operator, venue manager or key person	\$500
S308 (5) GA	Requirement to display notice of policy for identifying problem gamblers	Venue manager	\$2,500
S3212 (1)	Breach of an exclusion order issued under section 309 or section 310	Player	\$500

Reviewed Date	May 2024
Next Review Date	May 2025, or when gambling legislation changes