

Application for Local Authority Gambling Consent - Class 4 Gambling and TAB Venues



This application for consent is made in accordance with the Queenstown Lakes District Council Class 4 Gambling and TAB Venue Policy 2024, section 99 of the Gambling Act 2003, and section 95 of the Racing Industry Act 2020.

Under the Gambling Act 2003, applicants for Class 4 electronic gaming ('pokies') venue licences must have the consent of the territorial authority in which the venue is, or will be, located.

Similarly, under the Racing Industry Act 2020, applicants for stand-alone Totalisator Agency Board (TAB) venues must have consent of the territorial authority in which the venue is to be located.

In order to sufficiently assess the gambling proposal, all questions in this form must be completed, all attachments must be provided as per the checklist at part 8 of this application, and the \$500 application fee paid in full.

Notes:

- Use this form to apply to establish a new gaming venue, to increase the number of electronic gaming machines at an existing venue, to relocate electronic gaming machines from one venue to a new venue, for a venue where no class 4 gambling has occurred for the past six months, and for new stand-alone TAB venues seeking to establish.

1 APPLICATION TYPE	
1.a	<p>Application for</p> <p><i>Please select one as appropriate</i></p>
	<p><input checked="" type="radio"/> New Class 4 Venue</p> <p><input type="radio"/> Increase of machines at a venue</p> <p><input type="radio"/> Relocation of existing machines to a new venue</p> <p><input type="radio"/> For a Venue Where No Class 4 Gaming Has Occurred For The Past Six Months</p> <p><input type="radio"/> New Stand-alone TAB Venue</p>

2 NEW VENUE DETAILS	
2.a	<p>Trading name of premises where gaming machines or the TAB will be located</p> <p><i>If changing, state both names</i></p>
	The Luggate Hotel.
2.b	<p>Physical address</p> <p><i>Location of venue</i></p>
	60 Main Road Luggate, 9383
2.c	<p>Principal purpose of venue</p> <p><i>Describe the principal purpose of the venue (e.g. sale of alcohol).</i></p>
	Sale of alcohol Accommodation & Food.

<p>2.d Physical layout of venue <i>The gaming area must be physically separated from the remainder of the venue. Describe how this is/will be achieved, and provide supporting materials (e.g. floor plan, photographs) with the application.</i></p>	<p><i>As attached.</i></p>
<p>2.e Number of existing machines at venue (if any)</p>	<p><i>0</i></p>
<p>2.f Proposed total number of machines <i>Note: Venues licensed after 17 October 2001 may apply for up to 9 electronic gaming machines. Venues first licensed before this date may apply for up to 18 electronic gaming machines.</i></p>	<p><i>9</i></p>
<p>2.g Provide the names of those who will be managing the venue</p>	<p><i>Russell Walter Charles Hilley. Jeanette Mary Punselie ELLIS.</i></p>

<p>3 RELOCATION OF EXISTING MACHINES TO A NEW VENUE</p>	
<p>3.a Reason for relocation including what venue the machines are moving from, and what venue the machines are moving to</p>	<p><i>N/A</i></p>
<p>3.b How many machines were located in the previous venue</p>	<p><i>N/A</i></p>
<p>3.c How many machines are being relocated to the new venue</p>	<p><i>N/A</i></p>
<p>3.d Principal purpose of the new venue <i>Describe the principal purpose of the venue (e.g. sale of alcohol, or racing activities).</i></p>	<p><i>N/A</i></p>

4 ALCOHOL LICENCE DETAILS	
4.a	On-licence number (E.g. 68/ON/1234/2024)
4.b	Expiry date

68/ON/0715/2023/TA26023-
16 June 2026.

5 APPLICANT DETAILS	
<i>The applicant is the Trust, private company, or entity that will be receiving the proceeds from the gaming machines.</i>	
5.a	Full legal name of applicant
5.b	Postal address

Pub Charity Limited
L3, 191 Thorndon Quay, Pipitea, Wellington 6011

6 CONTACT PERSON FOR APPLICATION	
6.a	Full name
6.b	Position / role
6.c	Phone number
6.d	Email
6.e	Postal address

Sam Keller
Operations and Compliance Officer
04 3824428
sam@pubcharity.nz
L3, 191 Thorndon Quay, Pipitea, Wellington 6011

7 LOCALITY	
7.a	List number and type of all 'sensitive sites' within 50m of the premises

Sensitive sites include schools, childcare centres, places of worship or other community facilities. Applicants are required to demonstrate that the proposed venue will not adversely impact on such institutions. It is not sufficient to merely state that there will be no adverse impacts. The applicant must specify the reasons why there will be no adverse impacts, or suggest mitigating action where there may be an adverse impact.

NIL within 50m.

7.b	List the number and type of all gambling venues within 50m of the proposed venue	<i>NIL within 50m.</i>
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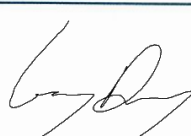
8 SUPPORTING DOCUMENTS CHECKLIST

Copies of the following documents must be included for all applications:

- Gambling Harm Minimisation Policy
- Staff Training Programme
- Gambling Host Responsibility Policy
- Locality map showing locations of other gambling venues, childcare facilities, schools, places of worship, and community facilities all within 50 metres of the proposed premises. *NIL*
- A scale floor plan of the entire premises including detailing the proposed gaming area with area size and machine setup.
- Photo of the exterior of the premises, and proposed gaming area.
- Landowner approval indicating they are aware their building will be used for gambling purposes.
- Copy of the premises alcohol licence.

9 DECLARATION

- I confirm that, at the time of writing, all information provided is true and correct to the best of my knowledge.
- I confirm that I have read and understood the Queenstown Lakes District Class 4 Gambling and TAB Venue Policy 2024.

9.1	Full name	Craig Denny
9.2	Date	18/05/26
9.3	Signature	

10 SUBMITTING THE APPLICATION

The application can be submitted over the counter at any QLDC office, or via email to alcoholinspectors@qldc.govt.nz.

Alternatively, to apply by post, please send the completed application together with all supporting documents to the following address:

Queenstown Lakes District Council
Attn: Alcohol Licensing Team
Private Bag 50072
Queenstown 9348

11 PAYMENT

Applications cost \$500.00 (inc. GST) and will not be processed until full payment is received.

Payment can be made as follows:

- **In person.** Visit any QLDC office to pay at the counter (listed at bottom of form).
- **Over the phone.** Call our customer service team on 03 441 0499.
- **By bank transfer.** Account number for payment is 02 0948 0002000 00.
- **Via the [QLDC website](#).** After lodgement, you will be emailed an Application Reference to use for the payment.

Use the Application Reference (if known) or “Gambling” and the premises name as a reference for the payment.

Please note: Payments by credit card incur an additional 1.5% fee.

12 FURTHER INFORMATION

For more information, please read the [Class 4 Gambling and TAB Venue Policy 2024](#) on the QLDC website (under the Regulatory tab), or contact:

Phone: 03 441 0499 (Queenstown)

03 443 0024 (Wānaka)

Email: alcoholinspectors@qldc.govt.nz

QLDC Offices

Queenstown

10 Gorge Road
Queenstown 9300

74 Shotover Street
Queenstown 9300

Wānaka

47 Ardmore Street
Wānaka 9305

Opening Hours: 8.00am – 5.00pm, Monday to Friday (except public holidays).

Applications are processed by the Alcohol Licensing team, based at the QLDC Shotover Street office.

TEMPORARY AUTHORITY

Section 136 Sale & Supply of Alcohol Act 2012
On-Licence for Premises

PURSUANT to the Sale and Supply of Alcohol Act 2012 (the Act), **Sticks Dream Limited** is authorised to sell and supply alcohol on the premises situated at **60 Main Road, Luggate, Wānaka** and known as **The Luggate Hotel** in accordance with the conditions of the underlying **On-Licence: 68/ON/0715/2023**.

The holder of a temporary authority shall for the purposes of the Act have the same duties, obligations and liabilities as the holder of the on-licence to which the temporary authority relates.

The authority conferred by this licence must be exercised through a manager or managers appointed by the licensee in accordance with Subpart 7 of Part 2 of the Act.

CONDITIONS

This licence is subject to the following conditions:

- a) No alcohol is to be sold on the premises on Good Friday, Easter Sunday, Christmas Day, or before 1.00pm on Anzac Day to any person who is not present on the premises to dine.
- b) Alcohol may be sold only on the following days and during the following hours:

Indoor & Outdoor Area:

Monday to Sunday 8.00am to 2.30am the following day

- c) The following steps must be taken to promote the responsible consumption of alcohol:
 - i) A minimum of three substantial food types must be readily available at all times that the premises is open for the sale of alcohol. Menus must be visible and food should be actively promoted. The range or style of food will be as shown on any menu submitted. Food must be suitable for a single customer, at a reasonable price and served within a reasonable time of being ordered.
 - ii) The licensee must have available for consumption on the premises, at all times when the premises is open for the sale of alcohol, a reasonable range of non-alcoholic refreshments and a low-alcohol beverage.
 - iii) Drinking water must be freely available to customers whilst the premises is open for business.
 - iv) The licensee must ensure that signs are prominently displayed within the licensed premises detailing information regarding alternative forms of transport from the premises.
- d) The following steps must be taken to ensure that the provisions of the Act relating to the sale of alcohol to prohibited persons are observed: display of appropriate signs detailing the statutory restrictions on the supply of alcohol to minors and the prohibition of sale to intoxicated persons, identification of minors.
- e) The licensee must implement and maintain steps at promoting the responsible consumption of alcohol, as proposed in the application for the licence.
- f) The entire premises is **undesigned** from 8.00am until 10.00pm, thereafter, the entire premises is designated as **supervised**, in accordance with the premises plans submitted to the District Licensing Committee on 6th March 2017.
- g) According to the Sale and Supply of Alcohol (Fees) Regulations 2013 the premises is assigned the fees category: **High – Tavern**.

DURATION

Subject to the requirements of the Act relating to the payment of fees, and to the provisions of the Act relating to the suspension and cancellation of licences, this licence is in force from **16 March 2026 until 16 June 2026**, or until such date as the holder's application for an on-licence has been determined, whichever is the sooner.

DATED at **QUEENSTOWN** on the 12 March 2026.



Anthony Hall
Secretary

Queenstown Lakes District Licensing Committee



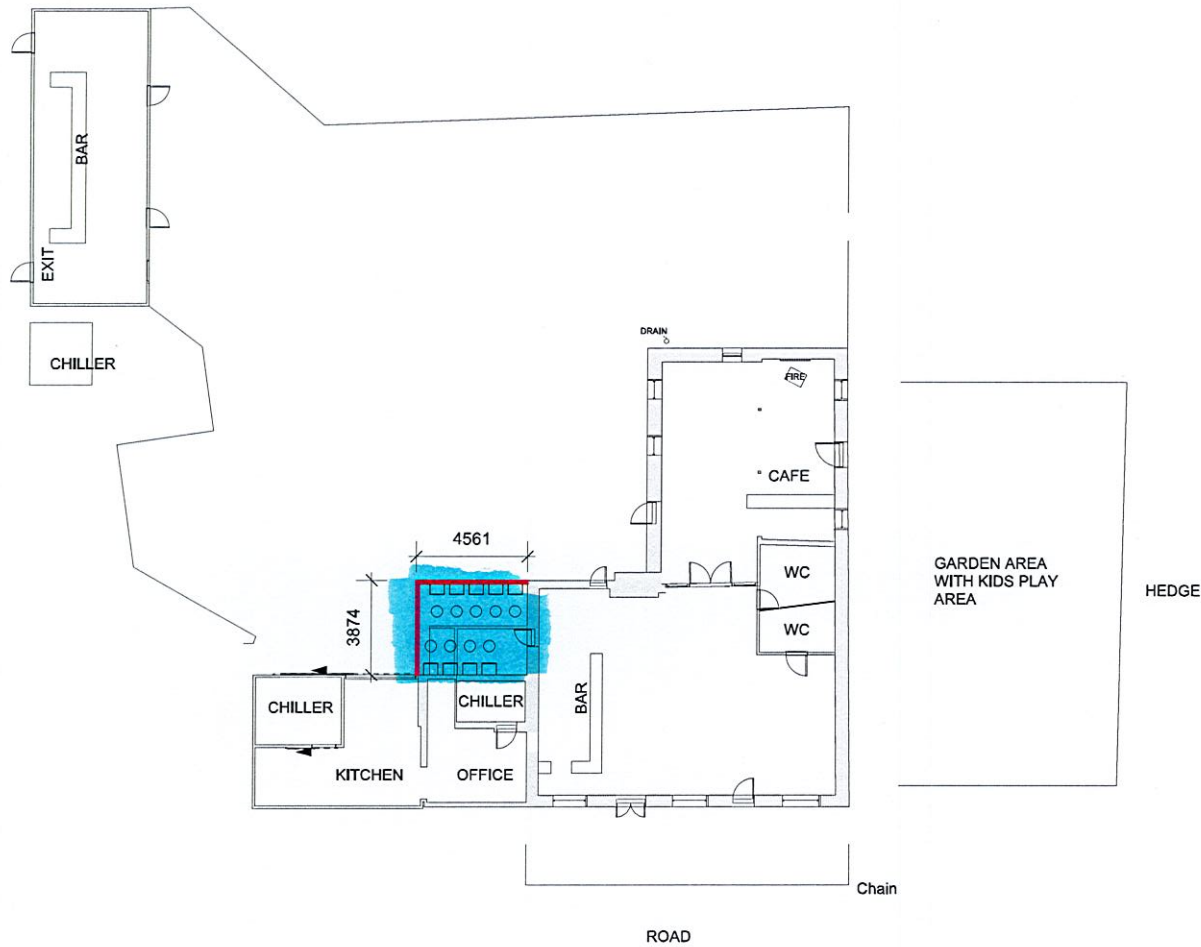
Luggate Hotel

Proposed

19.2.26

Scale 1:200 @ A3

We attempt to ensure the plan is complete and correct, however we take no responsibility for any error or omission.



I certify that this is a true & accurate representation of the venue at the time dated	Venue operator, (or their authorised representative, eg director) Print Name & Designation	Trustee /officer of the corporate society Print Name & Designation
	Signed	Signed
	Date	Date



LUGGATE

THE

BAR

LUGGATE HOTEL
HISTORIC
BAR & RESTAURANT
OPEN 7 DAYS
ALL WELCOME
EST 1867

OPEN

Cafe Open
Coffee
Doughnuts
Teas

LUGGATE

SPEIGHT'S

THE ALBION BAR

LUGGATE
HOTEL

ROOMS
& RESTAURANT
OPEN 7 DAYS
ALL WEATHER

OPEN

OPEN
10am
till
LATE



You're in Sheld County
LONGHATE MOTEL





AFTER 8 PM MENU

- FRIES + choice of sauce \$6.95
- TRUFFLE FRIES \$7.95
- FISH & CHIPS \$11.95
- GARLIC BREAD \$2.95
- WEDGES w/ SAUCE \$7.95



Special Daily Drinks

6.99

BAR SNACKS

- FRIES \$4.8
- CORN CHIPS \$4.8
- TRUFFLE FRIES \$10
- GARLIC BREAD \$2.95
- WEDGES \$7.95
- FISH & CHIPS \$11.95
- GARLIC BREAD \$2.95
- WEDGES \$7.95
- SEAFOOD TACOS \$12.95
- CHICKEN MIDDLES \$12.95
- BIG BASS PLATTER \$19.95





100%
L-LINSE-2PW

HUNTAWAY

Wither Hills

GORILLA

2017



Gamble Host Responsibility

Guide for Venue Staff



Disclaimer

This document covers relevant aspects of the Gambling Act 2003 and the Gambling (Harm Prevention and Minimisation) Regulations and is not intended to replace them. It provides general guidance and should not be relied on to establish compliance with all the requirements of the Act or the regulations. The document should be read in conjunction with the Gambling Act and the regulations. For specific situations or problems, it may be necessary to seek independent legal advice.

Refer to DIA Gambling Harm Prevention and Minimisation Guidance for more information on your compliance obligations. **Gambling Harm Prevention and Minimisation Guidance**

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Introduction

If your venue has gambling machines, it has a legal duty to minimise gambling harm. All staff who work in the gambling area have certain responsibilities to keep people who gamble safe.

We know that gambling host responsibility has some challenges. We've developed this guide with the help of venue managers and staff across the country to help you overcome those challenges so you can do your job more easily and stay within the law.

Why should you care?

Gambling can be harmful

Being a responsible host means taking care of your customers. Many people who gamble will be gambling at levels they can afford. However, around one in two people who play pokies at least monthly or almost every month experience harm as a result of their gambling (2020 Health and Lifestyles Survey, Te Hiringa Hauora/Health Promotion Agency).

The financial and emotional stress from this is likely to be affecting their household, their wider family and friend network and their workplace.

While one person may be able to afford to spend \$20 on gambling, for another, it may mean going without basic grocery items that week. And while someone may be happy and safe spending 2 hours in front of a machine, for another that might take them away from caring for their children or other important responsibilities.

It's the law

➤ *The law says that any venue with pokies must minimise the risk of harmful gambling. This is the responsibility of the venue manager and staff who deal with people who gamble. This guide provides practical information to help you meet these responsibilities.*

The harm minimisation regulations have created an additional five infringement offences for venue managers. This will be covered in your harm minimisation training.

How should you use this guide?

- *To be a responsible gambling host, you don't need to know anything about a person's financial situation or other information about their life.*

This guide provides some simple steps that you as a staff member can take every day to keep your customers safe. It also includes the signs of gambling harm to look for and information on how to respond.

You don't need to memorise every word in this document. You should just be familiar enough with this guide that you can refer to relevant parts as and when needed.

What if you're a venue manager?

As a venue manager, you have a number of specific responsibilities to ensure staff monitor, identify and respond to signs of gambling harm at venues.

Policy

Your society must have a harm prevention and minimisation policy for your venue. Make sure that you know what's in the policy as you are legally responsible to ensure the policy is being carried out. Use this guide to help put that policy into practice.

Monitoring

You must ensure staff are monitoring the gambling room (three sweeps per hour at least 10 minutes apart) and that staff are considering if a person gambling is showing signs of gambling harm.

You must ensure staff make records of each sweep.

Length of time people who gamble are present

You must ensure staff take reasonable steps to identify if a person is present for nine sweeps in a row. This will require staff to track an individual's presence in the gambling area during consecutive sweeps.

Conversations

Whenever a sign of harm is first identified, you must ensure staff have a conversation with the person who is gambling. This is to help you work out whether or not gambling may be causing them harm. The conversation and the outcome of it must be recorded. See p. 18 for more information on conversations.

Weekly review of records

What you are looking for during your review is covered on page 12 of this guidance.

Training requirements

Training requirements are set out in your society's harm prevention and minimisation policy.

Who must be trained and when

- Societies or clubs must provide gambling harm awareness training to all venue staff who supervise gambling in the course of their duties.
- Supervising gambling is supervising people while they are gambling on the machines, and people at the venue whose actions are showing an intention to start gambling. For example:
 - staff doing sweeps of the gambling area
 - staff responsible for monitoring people making ATM/EFTPOS transactions to use for gambling at the venue.
- Before staff supervise gambling, they must be trained.
- There must always be a trained person at the venue whenever the pokies are available.
- Staff must receive training at least once a year.

Training must be practical and interactive

Staff who are trained are able to:

- identify signs of gambling harm
- interact and build rapport with people who gamble
- start conversations with people who gamble to help work out if the gambling is or may be causing harm
- know how to talk to a person who gambles who is distressed or agitated
- provide that person with information about gambling harm, gambling support services and explain/offer the exclusion process, if appropriate.

➤ *Use this guide to support training. It has practical things that staff can do to help stay within the law.*



What to do **every day**

- *Take every opportunity to get to know people who gamble at your venue*
- *Learn the signs of gambling harm*
- *Be observant during sweeps of the gambling area*
- *Shift handovers*
- *Record keeping and review*
- *Share concerns with other staff*
- *Venue manager review*
- *Consider your cash and alcohol service*

Take every opportunity to get to know people who gamble at your venue

Greet each person who is gambling

It's good customer care to greet each person as they enter the room. You don't need to have a long conversation, but simply say "Hello" and ask "How are you?" or "What are you up to today?" This will remind them that you're taking an interest in them and will be keeping an eye out for them.

Cash withdrawals

Any EFTPOS cash withdrawal provides a great opportunity to chat with someone who is gambling. If possible, it's a good idea to slow down the process so you can talk. You may like to ask "How are you going?" or "What are you up to for the rest of day?" This can shift their focus out of the gambling zone and remind them of their responsibilities outside of the venue.

Chat regularly

One of the most important things you can do is to get to know the people who are gambling. Have some regular communication with them. Become familiar with your customers, and notice any change in attitudes, mood and behaviour.

- *Chat to them whenever you can – as they come in, as you do a sweep of the gambling area and as you are serving them at the bar. This will help you develop a good rapport with each person who is gambling, and you'll build up a picture of how they usually gamble and behave.*

Sometimes a person won't be showing any signs of harm, but their gambling may still be causing harm. That's why having regular conversations with people who gamble is so important. It helps you understand whether the gambling is still a bit of fun or becoming something more.

Suggestions for getting to know people who gamble and building rapport

Meet and greet

“Let me know if there’s anything I can help you with today.”

“How’s your day going?”

“What are your plans for the rest of the day?”

Build rapport (through the above interactions)

Provide customers with an awareness of your gambling host responsibilities.

For example, “My job includes providing you with information and support about gambling safely within your means.”

Talk to them about their gambling before they start gambling

This will help you identify if harm is occurring in later conversations.

For example, “how long do you want to gamble today?” or “Have you set a limit for how much you’d like to spend today?”

This gives the person gambling a chance to consider what their limits are before they start gambling.

Look out for changes in gambling behaviour

If you get to know people who regularly gamble, you will start to notice their usual gambling habits. It is particularly important to take note if their gambling changes (e.g. spending more time or money). Note these changes in behaviours in your records.

Learn the signs of gambling harm

➤ *There are several behaviours that are most frequently seen in people who gamble that are experiencing harm from their gambling. It is crucial that you get to know these signs so you can look for them during sweeps of the gambling area and know how to respond. See pages 15 to 17 for the signs of gambling harm.*

Be observant during sweeps of the gambling area

What to look for in the gambling area

- *You are required to undertake three sweeps of the gambling area every hour. This is how you will monitor and identify people who are showing signs of harm. In particular, keep a look out for:*
- *minors*
 - *excluded people who gamble (see page 22)*
 - *signs of gambling harm (see pages 14 to 17).*

Minors

A minor is anyone who is under the age of 18 years. It's against the law for anyone under 18 to play gambling machines. No exceptions.

If you think someone is under 18, ask them for photo ID. If they don't have any, you must make sure that they stay out of the gambling area. Otherwise, you risk being prosecuted.

Prizes and minors

A prize must not be paid out to a person who is under 18.

If you think a prize winner may be under 18, you must keep the winnings for up to 7 days to give them the opportunity to prove they are 18 or older. You must tell them you are doing this. You must also keep a record of their name, address, the date and details of the prize. If they can't verify their age within 7 days, the money is to be treated as net proceeds of class 4 gambling.

Adult supervision of minors

Minors are exposed to harm if the supervising adult has taken them into the gambling area or has left them unsupervised in other parts of the venue while they are gambling.

To keep minors safe from gambling harm, you should make sure that:

- minors are not allowed in the gambling area at all
- minors are not left unsupervised in other parts of the venue or in the car park if the supervising adult is in the gambling area
- the car park is checked regularly to make sure that minors haven't been left unsupervised in cars.

Fines and minors

- *It is against the law to allow someone under the age of 18 to play the pokies at your venue. Venue management may be fined up to \$1,000, and the corporate society or trust that operates the pokies in your venue may be fined up to \$5,000. A person gambling who is underage may be fined up to \$500.*

Record keeping and review

Venue managers and staff are required to keep records of all conversations and any outcomes with people who show signs of gambling harm. Any reason(s) for not having subsequent conversations should also be recorded.

Records can either be kept electronically or they may be handwritten.

A paper-based template is available to download on the [DIA website](#).

These templates are designed to support you to meet the requirements of your venue and the harm minimisation regulations. Alternatively, your society may provide you with record-keeping templates.

- *Keep copies of the templates in a place where it is easy for staff to find. Follow your venue procedures, and whenever a sign of harm is first identified, you must have a conversation with the person who is gambling. This is to help you work out whether or not gambling may be causing them harm.*

If you think gambling is or may be causing harm, take action immediately.

Record your conversation and the outcome of it.

If you see a sign of gambling harm again, a subsequent conversation about gambling harm is required unless you have a good reason to believe that further conversations will not be helpful in identifying if the person is experiencing gambling harm. This reason should be recorded.

If you are unsure, escalate to your manager.

The regulations require that specific information is recorded for:

- sweeps of the gambling room (which must be done three times per hour at least 10 minutes apart)
- any signs of harm observed in people who are gambling, the resulting conversations staff have with them and any further action taken in respect to the person who is gambling
- venue manager's review of these records at least once per week.

Shift handovers

➤ *It's important to have a handover process at the beginning and end of each shift. At the beginning of your shift, look through the sweep and conversation records to see what's been happening with your patrons and whether there are any existing concerns you need to keep in mind or potentially take action on.*

Two signs of gambling harm require careful handover:

- How many sweeps a person gambling has been present for in the gambling area (being present for nine or more sweeps is a sign of gambling harm).
- How many withdrawals a person gambling has made via EFTPOS or ATM (two or more withdrawals is a sign of gambling harm).

These signs require staff to monitor and record people's gambling activities. At the end of your shift, make sure you update the sweep and conversation records so that they are complete at handover.

If you have any ongoing concerns about someone who is gambling, either note it down for the next shift and/or relay this information to your duty manager as soon as possible.

Share concerns with other staff

- *Let the manager and your colleagues know about any concerns you have about people who gamble. It's good practice at your staff meetings to talk about certain people and their behaviours you're concerned about and to hear from others about things that they have noticed. Discuss the best way to respond to someone you're concerned about and even role-play scenarios.*

You could share this information at a regular staff meeting or you could choose a quiet moment before, during or after your shift to chat with other staff.

Venue manager review

The venue manager is required to conduct a weekly review of all records.

The purpose of the venue manager's review is to consider whether:

- staff have taken the appropriate action after identifying a sign of harm,
- further action is needed,
- there are any people who gamble for whom there are reasonable grounds to believe are experiencing harm.

This allows the manager to piece together incidents relating to an individual person who is gambling over time, to see if there are any patterns emerging in a person's behaviour.

After considering these points, the venue manager must make a decision on what the next steps are and who and how this will be carried out.

Consider your cash and alcohol service

EFTPOS declined

A customer may attempt to withdraw cash but have their EFTPOS card decline. Repeated attempts like this are a sign of gambling harm. Failed EFTPOS transactions count towards the two or more cash withdrawal limits.

Cash withdrawal limits

Most people who gamble have a limit in mind before they start gambling, and they will usually take that amount out on their first withdrawal. If they make repeated EFTPOS withdrawals, they are likely to be spending more than they wanted to.

- *Two or more cash withdrawals through either the ATM or EFTPOS is a sign of gambling harm.*

This sign of harm and the conversation you have must be recorded following your venue's procedures.

When paying out winnings

- *Keep an eye out for people gambling who win a jackpot or hit cancel credit. It's good practice to pay them out in \$50 and \$100 notes so that they can't put the cash straight back into the machine. Alternatively, you could offer to hold the cash in the safe until they're ready to leave.*

Alcohol service

Alcohol can cloud judgement and may encourage someone to play for longer or with more money than they would have otherwise.

Avoid serving alcohol in the gambling area. This will encourage people who are gambling to take breaks, and it gives you an opportunity to chat with them out of the gambling area.



What to do if you see **signs of gambling harm**

- *What are the signs of gambling harm?*
- *What you need to do if you identify a sign of harm*
- *Consider which staff member is best to approach the person who is gambling*
- *Have a conversation to find out if gambling is causing harm*
- *Provide a harm minimisation wallet leaflet*
- *Support services*
- *Support the exclusion process*
- *Respond to concerns from a third party*

What are the signs of gambling harm?

There are a number of signs that gambling may be causing harm. Harm can be to the person who is gambling, their whānau, job, or community.

If someone's gambling is or may be causing harm, venue managers have specific responsibilities to act under the law.

Signs of gambling harm

(those identified in the Regulations* are in bold)

Length of play

- **Gambling during nine or more consecutive gambling area sweeps.**
- **Waiting to gamble as soon as the venue opens.**
- **Refusing to stop gambling when the venue is closing or otherwise appearing unable to stop gambling.**
- Gambling for long periods (3 or more hours) without taking a break.
- Gambling most days.

Money

- **Withdrawing or attempting to withdraw cash from an ATM or EFTPOS device on two or more occasions in a day, which is used to gamble at the venue.**
- **Trying to borrow money from venue personnel or other venue customers to use for gambling.**
- Putting large wins straight back into the machine.
- EFTPOS/ATM repeatedly declined.
- Leaving venue to find more money to gamble.

Signs of gambling harm

(those identified in the Regulations* are in bold)

Behaviour during play	<ul style="list-style-type: none">• Appearing visibly distressed or angry either during or after gambling, for example, crying, holding their head in their hands or hitting the machine.• Signs of distress may look like sweating, worrying, being nervous/edgy or shaking. You may observe other signs of distress in your venue.• Signs of frustration or anger may look like grunting, groaning, playing roughly, having an angry outburst towards personnel or others in the gambling room, or kicking/shouting/swearing at the machine. You may observe other signs of frustration or anger in your venue.• Trying to play two or more machines.• Playing intensely or fast (high spend per line) without reacting to what's going on around them.• Having gambling rituals or superstitions (rubbing or talking to the machine).• Intimidating or standing over other people who are gambling.
Other behaviour	<ul style="list-style-type: none">• Leaving children in the car or unattended at the venue.• Telling personnel that gambling is causing them problems.• Appearance or hygiene deteriorates significantly.• Friends or family raise concerns about them.• Going out of their way to avoid being seen at the venue, including asking personnel to not let others know they are there.• Complaining to personnel about losing.

*Gambling (Harm Prevention and Minimisation) Regulations 2004

What you need to do when you first identify a sign of harm

Whenever a sign of harm is first identified, you must have a conversation with the person who is gambling. This is to help you work out whether or not gambling may be causing them harm.

Record your conversation and the outcome of it.

If you think gambling is or may be causing harm, take action immediately.

If you are unsure, escalate to your manager.

During conversations with someone whose gambling is causing harm, staff or managers need to decide what assistance they will offer. Options include:

- providing them with a harm minimisation wallet leaflet
- offering them support to contact a gambling support service
- offering to help them self-exclude, explaining multi-venue exclusions, and following up with your venue manager.

Consider which staff member is best to approach the person gambling

- *Think through which staff member would be best to approach someone you are concerned about and how that might be done. This may be the manager or the staff member (acting on behalf of the manager) who has the best rapport with that person. Ensure that the staff member has a good understanding of the specific signs of gambling harm that have been observed and any other relevant information about the person who is gambling before they follow the approach below.*

Have a conversation to find out if gambling is causing harm

Be as discreet as possible

It's good to think in advance of a quiet spot in the venue where you could have a chat. You may offer them a complimentary tea or coffee away from the machines.

Be kind

Any approach should be made in a helpful and respectful way. This probably won't be easy for either of you. It's useful to prepare for these situations by thinking through in advance what you will say. Your harm minimisation training should provide you with opportunities to role-play these conversations with a colleague.

➤ *The person who is gambling may not be very receptive to your approach. Remember that, despite their initial response, the approach you make is still likely to have a positive impact on their life and those around them.*

Conversation prompts

It's important to talk through what you have seen or heard and let them know it's your responsibility to check on them.

"We are required by law to look after our gambling customers and make sure your gambling is not causing you harm."

Or

"Part of my role here is make sure you are okay with your gambling."

Some examples using the signs of harm

Length of play

"I've noticed [e.g. you've been gambling for 3 hours/nine sweeps today]."

"How is your gambling going?"

"How much longer do you think you might be here for today?"

"Perhaps it's a good time to take a break from the machines?"

Money

"I've noticed [e.g. you've made two withdrawals for gambling while you've been here]."

"How is your gambling going?"

"Have you set a limit for today?"

"Perhaps you could set a limit for today and I could help you stick to that?"

"We have a policy about the number of withdrawals – you've reached your limit for today/this will be your last withdrawal for the day."

Behaviour

"I've noticed [e.g. you've been crying today]."

"How's your gambling going?"

"I'm wondering if your gambling might be starting to become a bit of a problem for you?"

Based on your conversation with the person gambling, if you think their gambling is or may be causing harm, you must offer them assistance. Here are some prompts that you might find helpful.

Info and assistance

“Here’s some information about the signs of harmful gambling that I think might be helpful for you.”

“There are free and confidential support services available that offer professional guidance and tools. Perhaps I could help put you in touch with them?”

“There’s a free 24-hour Gambling Helpline and other free local services. I think it’s a good time to get in touch with them.”

“There are services specifically for Māori, Pasifika and Asian people in addition to mainstream services.”

“We have gambling harm information available in different languages. For example, the wallet cards are available in Mandarin, Korean, Hindi, Māori, Samoan and Tongan languages.”

Exclusion

“We have a self-exclusion policy that I’d like to talk to you about – excluding yourself helps you take a break from gambling for a period of time.”

“Would you like to chat about our exclusion procedure/how to exclude yourself from the venue?”

“I understand that you don’t want to exclude yourself from this venue, but I’m really concerned about your gambling. At this point, I need to ensure you are safe and will need to exclude you from the venue.”

Repeat conversations – where a person who gambles continues to show a sign of harm after the first conversation.

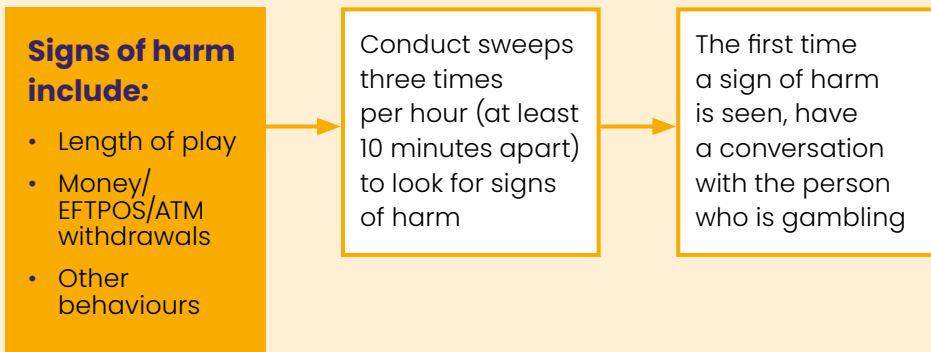
If you have already had a conversation and the person who is gambling has said they are okay, the next time a sign of harm is seen, you'll need to have a more in-depth conversation, *unless* you have a good reason to believe that further conversations will not be helpful in identifying if the person is experiencing gambling harm. This reason should be recorded.

For example, if a player has told venue staff that they will be present for two more sweeps while waiting for a ride home, it may not be necessary for a further conversation to happen unless another sign of harm is observed or the player fails to leave at the time they said they would.

If follow-up conversations are required, you will need to ask more questions and probe a bit more as what you are seeing in their gambling and what they are saying are not adding up. An option is to elevate to your manager and ask them to have the next conversation with the person.

If you have ongoing concerns that harm is occurring, self-exclusion or a venue-initiated exclusion should be considered.

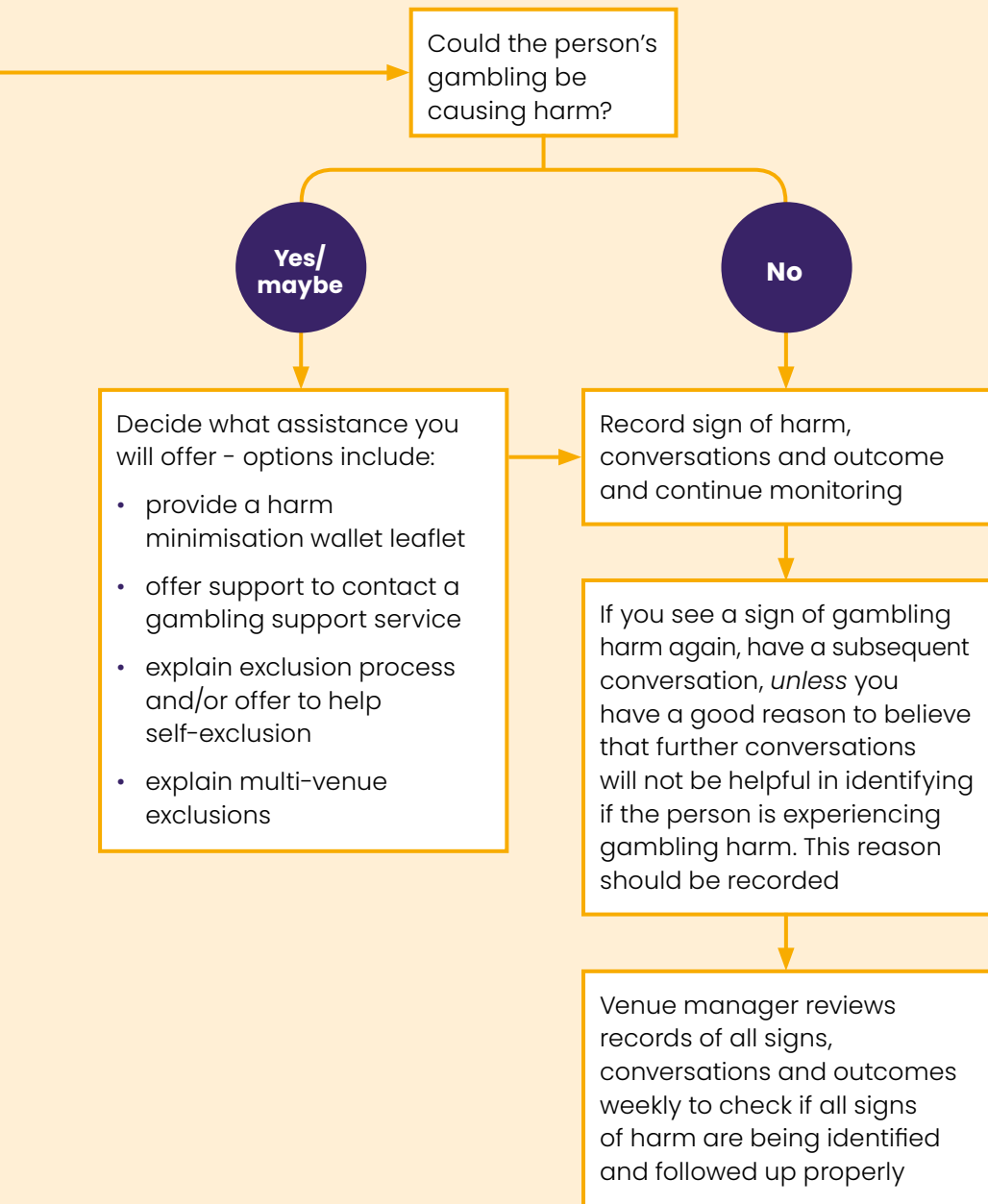
➤ safergambling.org.nz/support



Need support or help?

If you are unsure what to do at any point, talk to your venue manager or person acting on their behalf. They can help you to work out who should be involved in any further conversation needed. The venue manager may consider whether a venue-initiated exclusion is required.

➤ ***Always let the venue manager know if you have concerns about a person who is gambling – the venue manager has a legal duty to identify and minimise harm at the venue.***



Provide a harm minimisation wallet leaflet

Your venue is legally required to stock leaflets for people who gamble. You should provide them with a harm minimisation wallet leaflet to take away with them. The leaflet is discreet to hand over, small enough to fit in their pocket and includes information about characteristics and consequences of harmful gambling and how to get help.

The wallet leaflet is available in seven languages. Please use them if appropriate.



Support services

➤ *Let the person who is gambling know that there is free and confidential support and advice available. Offer to help them make contact with a gambling support service. You're not expected to provide the individual support that a trained counsellor can offer, but the conversations and rapport you have with the person gambling can make a difference to their safety and wellbeing.*

Support options are free and confidential and are happy to provide support and advice to anyone concerned about their own gambling, or the gambling of others (e.g. friends or whānau members).

Face-to-face gambling support services

Free gambling support services throughout New Zealand provide face-to-face help, including culturally specific services (e.g. Māori, Pacific, Asian).

To find out what services are available and their contact details, use the QR code on the back of the harm minimisation wallet leaflet. It links directly to the Services Near You page on the Safer Gambling Aotearoa website or check safergambling.org.nz/support

Get to know the gambling support services operating in your local area. Invite them to a staff meeting so they can explain what they offer and how they can support you in your interactions with people who gamble.

Gambling Helpline

➤ *The free 24-hour Gambling Helpline – 0800 654 655 – offers professional and confidential telephone support to people who gamble.*

Helpline staff can talk through issues over the phone and/or refer people who gamble to free face-to-face counselling in their local area. They are also happy to talk to others, including venue staff, who are concerned about people who gamble.

Support the exclusion process

➤ *Exclusion orders are a legal protection for people who experience harm from gambling. The exclusion order is not a disciplinary tool and should not be used in that way. An exclusion order is often a very useful way to help a person who gambles manage their gambling and maintain their mana.*

Self-exclusion

Self-exclusion is when a person who gambles chooses to be excluded from a venue for a period of time. If asked, a venue manager or someone acting on their behalf must issue an exclusion order to anyone who seeks it. Additionally, if you have concerns about a person's gambling, you should offer to help them with the self-exclusion process or issue a venue exclusion.

The Multi-Venue Exclusion (MVE) system allows people who gamble to exclude or ban themselves from several venues in a defined area without having to enter a gambling venue and asking staff to be excluded at each venue in person.

MVE can be accessed through a preventing and minimising gambling harm service provider, or through the local MVE coordinator directly. See the MVE National Administration Service website below for local services or MVE Coordinator contact information. You can share their contact details with any people who gamble that are excluded from your venue or access a copy of the MVE referral form from the MVE website multivenueexclusion.org.nz

Venue-initiated exclusion

➤ *If a person is showing signs of gambling harm and you have spoken to them and determined that their gambling is causing them harm, it's recommended that you first offer to support them with the self-exclusion process. However, if they refuse and you have ongoing concerns, you should consider issuing a venue-initiated exclusion order.*

What you need to know about the exclusion process

- *It's important that you follow the exclusion process set out in your venue's harm prevention and minimisation policy.*

Here are some reminders to help you with that process:

- Inform the person gambling of the area in the venue they are excluded from.
- Agree on the length of the exclusion period, depending on what will be in the best interests of the person who is gambling. An exclusion order can be issued for any period of up to 2 years. The time period is often agreed between the staff member completing the order and the person who is gambling. If you are unsure about the best length of time, you can seek advice from your local gambling support service.
- Offer to put the person gambling in touch with a local gambling support service.
- Staff must keep accurate and full records of anyone who has been excluded. In addition, your venue should hold clear, accessible and secure photos of each excluded person who gambles.
- Please remember that any information, including photos provided by patrons, must not be able to be viewed by the public.
- Familiarise yourself with the photos at the start of each shift. This way, you can keep an eye out for any people who are excluded from your venue.
- It's also good practice for your venue to keep staff updated about who exclusion orders have been issued to, exclusion orders that are due to expire and any further actions or observations required. Use your staff meetings to review exclusion orders and discuss how to approach the customer if they return to the venue.

Fines

- *The law takes breaches of exclusion orders very seriously. Any venue manager or person acting on their behalf who fails to exclude a self-identified person who experiences harm from gambling or fails to remove an excluded person may be convicted and fined up to \$5,000. An excluded person can be convicted and fined up to \$500 for entering the gambling area.*

Respond to concerns from a third party

- *One of the most common indicators of harmful gambling is when a relation, friend or family member of the person who gambles tells venue staff that they are concerned about the them.*

If a person (other than the person gambling) raises concerns about a person who gambles, it's good practice to:

- Ask for the name and a description of the person gambling, and any behaviours causing concern. Remember, it's not appropriate for you to reveal any details you have about the person who gambles to the person making the request.
- Advise the person making the request that the venue has a harm minimisation policy. Explain that the venue staff will assess the person's behaviour against this policy and approach them if their behaviour indicates potential harm arising from gambling. If you or other staff know the person who gambles, you may wish to say that the person who gambles will be approached and provided with gambling harm minimisation information.
- Provide the person raising the concern with a harm minimisation wallet leaflet and let them know that it's free for them to contact the support services on the back.
- Thank them for talking to you about their concerns and assure them that the information they provide will be treated in confidence.

➤ **To order Gamble Host resources, visit order.healthpromotion.govt.nz and select Gamble Host under Minimising Gambling Harm**



HARM MINIMISATION AND GAMING HOST RESPONSIBILITY

A training programme to assist
you in gaming room compliance

HOST RESPONSIBILITY REQUIREMENTS

WHAT IS GAMBLING HOST RESPONSIBILITY?

You have legal obligations as a gaming room host

- It is part of our responsibilities in hosting a gaming venue.
 - You have a duty to your customers to be a responsible host.
 - It is part of your job to ensure customers are safe while on your employer's premises.
 - It is the law and there are consequences if we do not comply.
-

DEFINITION OF A PROBLEM GAMBLER



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



Section 3 Gambling Act 2003

HOST RESPONSIBILITY REQUIREMENTS

THE CONSEQUENCES

- Like alcohol, there are certain legal requirements that must be met.
- These are set out in the Gambling Act.
- Venues and staff have a clearly defined role, which we will cover in the training.
- Venues and staff can be fined for breaking the law.
- Venues can have gaming licences cancelled.

POTENTIAL CONSEQUENCES

These are some of the potential consequences of failing to fulfil your host responsibilities under the law:

Under age gamblers

Allowing someone under 18 to play pokies

\$1,000 fine for staff

\$500 fine for gambler

Exclusions

Failing to exclude self-identified problem gambler or failing to remove excluded gambler

\$5,000 fine for venue manager/staff

\$500 fine for gambler

New Regulation fines

Eftpos/ATM withdrawals, Room Sweeps, Record Keeping

\$1,000 fine for the Venue Manager

HOW GAMING MACHINES WORK

WHY THEY CAN BE ADDICTIVE

For most New Zealanders, gambling is a recreational activity that is enjoyed safely and in moderation.

However, it is estimated that about 0.2% of the adult population are 'problem gamblers', who are likely to be experiencing adverse consequences from their gambling and up to 0.8% of adult New Zealanders are likely to be 'moderate risk' gamblers, who may or may not be experiencing harm.

Although the total number is small, about 40% of the people that seek help for their gambling every year say that pub and club-based gambling machines are one of their forms of gambling.

Research shows that Māori and Pacific peoples, some Asian communities and people on lower incomes disproportionately experience gambling harm either as gamblers or family members.

Research has shown that continuous forms of gambling, like gaming machines, where any winnings can immediately be "reinvested", are more likely to lead to harmful behaviour than non-continuous gambling.

(Source: Dept. of Internal Affairs; Abbreviated from the original)

INTRODUCTION

GAMING RULES

RULE 4:

Restriction on use of more than one machine



ROOM SWEEP REQUIREMENTS

A MINIMUM OF 3 TIMES PER HOUR AT LEAST 10 MINUTES APART

Staff are NOT required to complete a Room Sweep if the room is empty.

It allows you to make a risk assessment of what's happening in your gaming room.

- Looking for potential signs of harm as per your incident register – **A.T.M**
- Long Periods of play, over 9 consecutive room sweeps (3hrs) 3hrs v 5hrs
- Assessing if a player has actually been in the room continuously or not (continuous play v continuous presence)
- Underage players?
- Exclude gamblers?

It's another way to interact and get to know your players.

**Create relationships with the customers.
Take time to speak to them.**

BASIC GAMING ROOM MANAGEMENT

GETTING TO KNOW YOUR PLAYERS

- If you are familiar with your players' betting patterns you are more likely to notice changes in behaviour
 - Getting to know your players means you can form relationships and makes it easier to communicate
 - However **Stranger = Danger**
Unknown Players Require Closer Monitoring
-

INTERACTING WITH PLAYERS

If you know your players and have built a rapport it will be easier to ask:

“IS EVERYTHING OK?”



BASIC GAMING ROOM MANAGEMENT

INFORMATION TO PROVIDE TO PLAYERS



GENERAL AND STRONG SIGNS

Make sure you're familiar with the signs so you can identify potential issues and take the appropriate action.

GAMBLING Harm Reference Card. Indicators may include but are not limited to:			
ATM	NON RISK	AT RISK	HIGH RISK
Anger & Behaviour	Calm and enjoying play.	Negative behaviours linked to their gambling activity. Excessive: Anger or visibly distressed during or after gambling – upset about losses – frustrated (for example grumble, growling, crying, holding head in their hands, button banging or hitting a machine).	Violence and threats of violence towards others. Admission by player that they are a Problem Gambler or their gambling is causing harm to others. Current Exclusion Order in place and attempt to enter gaming area. Escalate recorded incidents of negative behaviours to Risk Committee.
Time	Irregular play/Social play. Less than three hours of play in one session.	Gambling most days every week. Gambling during 9 or more consecutive gambling area sweeps. Wanting to gamble as soon as the venue opens.	Escalate excessive periods of play to Risk Committee, then recommended to be excluded. (Check Incident Register)
Money	Few, if any Eftpos transactions. No Declined Eftpos.	Withdrawing, or attempting to withdraw, cash from an automatic teller machine or EFTPOS on 2 or more occasions in 1 day to use for gambling at the venue. Eftpos declines – small amounts. Pull large wins straight back into the machines. Maximum betting patterns. Breaking self-imposed limits.	Excessive gambling expenditure and after escalation to Risk Committee recommended to be excluded. Attempting to borrow money from venue personnel or other venue customers to use for gambling. Asking for credit or trying to sell items to continue gambling.
Other			Refusing to stop gambling at the venue when the venue is closing, or otherwise appearing unable to stop gambling. Leaving children in a car or otherwise unattended at the venue.
ACTION	OK / MONITOR / INTERACT	MONITOR / RECORD / INTERVENE	EXCLUDE & REMOVE (from gaming area)
Tools	"OK TO PLAY?" Monitor percent in gaming area regularly (minimum of 3 times per hour).	"IS EVERYTHING OK?" Direct Questions/ Provide Harm Min Information. Record in Register. Escalate to PCL Rep.	Escalate to Manager & Risk Committee. Check Incident Register. Issue an Exclusion Order.

Date: / /

Manager on Duty: _____

Manager's Ph #: _____

Incident Report #: _____

MONITORING PLAYER BEHAVIOUR

PLAYER BEHAVIOURS

Three types of signs that could indicate that a player **may** be a problem gambler or that they or others may be experiencing harm from their gambling:



ANGER



TIME



MONEY

MONITORING PLAYER BEHAVIOUR

RECORD YOUR OBSERVATIONS

Recording anything you observe that is a concern in the incident register is a requirement

- It provides a player profile
- The DIA can request to see it
- It helps in decision making.

INCIDENT AND OBSERVATION REPORT

Venue: _____ Staff name: _____

Unique Identifying Feature: (or name if known) _____ Date: _____ Time: _____ AM / PM

Description of person: Sex: Male Female Age: 20-30 30-40 40-50 50-60 60+ Ethnicity: Paskehs Māori Pacific Islander Asian Indian Other

GENERAL SIGNS (TICK)

A Anger (behaviour)

- Anger/rude towards bar staff or other players caused by gaming
- Complaining the game is unfair
- Banging buttons
- Gearing/groaning
- Statements – is car's pay/rent/mortgage. Need money for groceries, bills, etc. **Must provide yellow card**

T Time

- Waiting at the door at opening
- Last to leave
- Gambles for a long period of play
- Multiple periods of play within the one day or playing on consecutive days
- Breaking self-imposed time limits
- Identified gambling during nine consecutive room sweeps. Time from: _____ Time to: _____ **Must undertake an intervention interview (legal requirement)**

M Money

- Attempts to withdraw small amounts (less than \$10) on EFTPOS/ATM
- Requests for credit using credit card
- Breaking self-imposed \$\$ limits for gambling purposes. Amount: _____
- Declined EFTPOS/ATM transactions. **Must provide yellow card**
- Multiple EFTPOS/ATM withdrawals for gambling. Total (\$): _____ Time period: _____ **Must undertake an intervention interview (legal requirement)**

STRONG SIGNS (TICK)

- Admits to having a gambling problem or not being in control of gambling
- Friends or family raise concerns about gambling
- Breaches Exclusion Order / POI
- Leaving children in a car or otherwise unattended

A Anger (behaviour)

- Causing damage to machine
- Abusive behaviour/angry outbursts
- Mood swings/VI addressed (crying)
- Self-hygiene

T Time

- Prioritising gambling above friends, family, employment
- Gambles all day

M Money

- Attempts to borrow money
- Attempts to sell personal effects

COMMENTS/OBSERVATIONS – Please turn over and fill out your comments and observations on the back

ACTION TAKEN (TICK ONE OR MORE)

- Asked "Is everything OK?"
- Provided yellow money slip card
- Approached player to discuss their gambling
- Intervention interview undertaken
- Taken to quiet area, explained Exclusion Order Process, given red card
- Given Exclusion Order and red card
- Other

FOLLOW-UP ACTIONS (TICK & RECORD COMMENTS)

- No further action required
- Monitor/Observe and Record
- Approach player to discuss their gambling on return to venue
- Provide information on return to venue
- Escalate to PCL Representative
- Escalate to AHG Risk Committee
- Exclude on return to venue
- Other

Staff Signature _____ Manager Signature _____

Important: Always attach a CCTV photo if one is available

INCIDENT AND OBSERVATION REPORT



Venue: _____ Staff name: _____ Date: _____ Time: _____ AM / PM

Unique identifying feature: (or name if known) _____

Description of person: Sex: Male Female Age: 20-30 30-40 40-50 50-60 60+

Ethnicity: Pākehā Māori Pacific Islander Asian Indian Other

GENERAL SIGNS (TICK)

A Anger (behaviour)

- Anger/rude towards bar staff or other players caused by gaming
- Complaining the game is unfair
- Banging buttons
- Grunting/groaning

Statements – ie. Can't pay rent/mortgage. Need money for groceries, kids, bills.



• **Must provide yellow card**

T Time

- Waiting at the door at opening
- Last to leave
- Gambles for a long period of play
- Multiple periods of play within the one day or playing on consecutive days
- Breaking self-imposed time limits

Identified gambling during nine consecutive room sweeps:

Time from:

Time to:

Must undertake an intervention interview (legal requirement)

M Money

- Attempts to withdraw small amounts (less than \$10) on EFTPOS/ATM
- Requests for credit using credit card
- Breaking self-imposed \$\$ limits
- Changing cash multiple times for gambling purposes:

Amount:

Declined EFTPOS/ATM transactions
Must provide yellow card



Multiple EFTPOS/ATM withdrawals for gambling:

Total (\$):

Time period:

Must undertake an intervention interview (legal requirement)

STRONG SIGNS (TICK)

- Admits to having a gambling problem or not being in control of gambling
- Friends or family raise concerns about gambling
- Breaches Exclusion Order / POI
- Leaving children in a car or otherwise unattended

A Anger (behaviour)

- Causing damage to machines
- Abusive behaviour/angry outbursts
- Mood swings/distressed (crying)
- Self-hygiene

T Time

- Prioritising gambling above friends, family, employment
- Gambles all day

M Money

- Attempts to borrow money
- Attempts to sell personal effects

COMMENTS/OBSERVATIONS – Please turn over and fill out your comments and observations on the back

ACTION TAKEN (TICK ONE OR MORE)

- | | | | | | | |
|--|--|--|--|---|---|---------------------------------|
| 1. <input type="radio"/> Asked "Is everything OK?" | 2. <input type="radio"/> Provided yellow money clip card | 3. <input type="radio"/> Approached player to discuss their gambling | 4. <input type="radio"/> Intervention interview undertaken | 5. <input type="radio"/> Taken to quiet area, explained Exclusion Order Process, given red card | 6. <input type="radio"/> Given Exclusion Order and red card | 7. <input type="radio"/> Other: |
|--|--|--|--|---|---|---------------------------------|

MUST BE COMPLETED

FOLLOW-UP ACTIONS (TICK & RECORD COMMENTS)

- No further action required
- Monitor/Observe and Record
- Approach player to discuss their gambling on return to venue
- Provide information on return to venue
- Escalate to PCL Representative
- Exclude on return to venue
- Other:

MUST BE COMPLETED

Staff Signature: _____

Manager Signature: _____

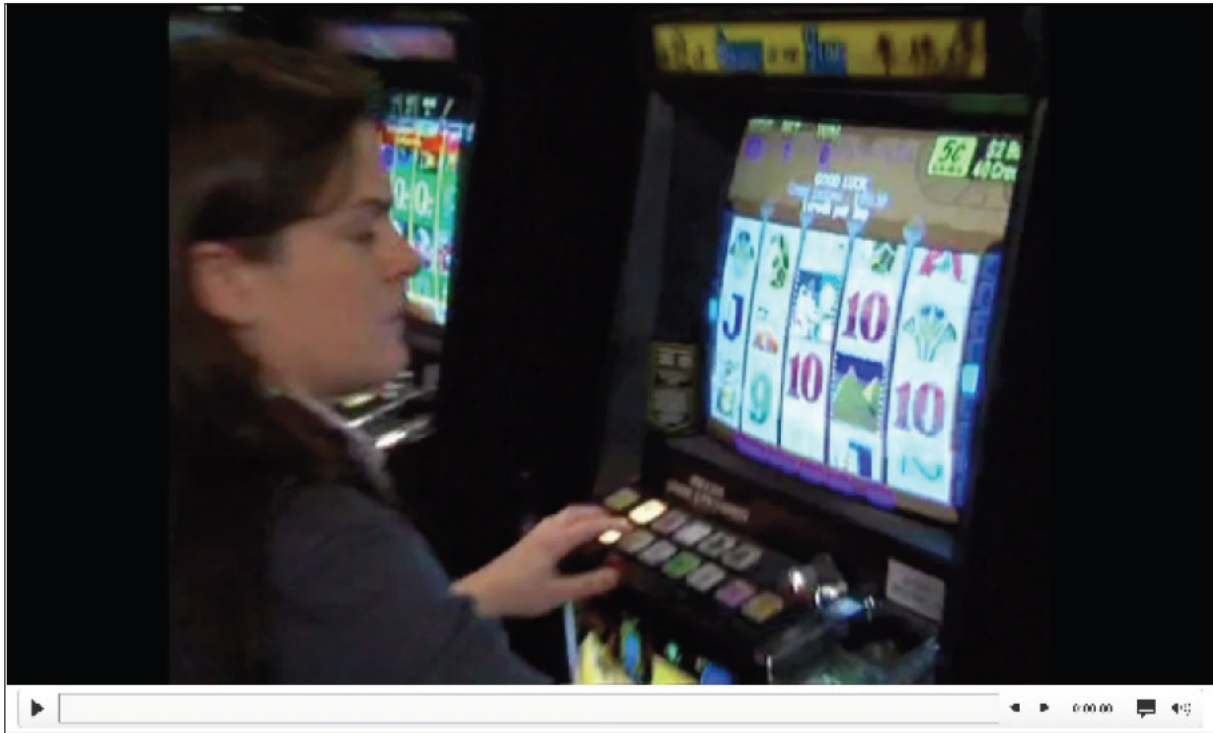
Important: Always attach a CCTV photo if one is available

DIA SEVEN SIGNS OF HARM

The signs of harm deemed by dia, but are not limited to, the following

- 1 Withdrawing, or attempting to withdraw, cash from an automatic teller machine or EFTPOS on 2 or more occasions in 1 day to use for gambling at the venue
- 2 Gambling during 9 or more consecutive gambling area sweeps
- 3 Attempting to borrow money from venue personnel or other venue customers to use for gambling
- 4 Leaving children in a car or otherwise unattended at the venue
- 5 Waiting to gamble as soon as the venue opens
- 6 Refusing to stop gambling at the venue when the venue is closing, or otherwise appearing unable to stop gambling
- 7 Appearing visibly distressed or angry either during or after gambling (for example, crying, holding their head in their hands, or hitting a machine)

HOW TO APPROACH PLAYERS



THE USE OF AN INTERVENTION INTERVIEW

- Used when a number of General signs have raised concerns about a person's gambling
- Specific questions are asked to help determine if any such issues in fact do exist
- Assists in making a decision on whether to exclude a player

HOW TO APPROACH PLAYERS

CONSIDER WHICH STAFF MEMBER SHOULD APPROACH THE PLAYER

- Safety
 - Rapport with player
 - Knowledge of signs
 - Access to relevant information
-

BE DISCREET

- Timing
 - Respect privacy
-

BE HELPFUL AND RESPECTFUL – AND PREPARED

- “Please don’t be offended...”
- “Is everything OK?”
- Be specific

POLICIES

OBLIGATION TO PROVIDE INFORMATION

- Yellow Card – the minimum requirement
 - Offer support services
 - Record all interactions in the Incident Register
 - If an Exclusion is issued a Red Card is required
-

STAFF REQUIREMENTS

Remember:

If you have recorded information in the Incident Register advise all other Venue staff

HOW TO APPROACH PLAYERS



APPROACH EXAMPLE – INTERVENTION INTERVIEW

OPENING **(HELPFUL AND RESPECTFUL)**

“Please don’t be offended – you’re a valued customer. It’s our job to make sure you’re safe and we’re obliged by law to check that your gambling isn’t causing you any harm.”

SIGNS IDENTIFIED **(SPECIFIC)**

“We’ve noticed that lately you have been waiting at the door for opening. You’ve also been spending long periods of time, up to six hours in the gaming room and your card has been declined on several occasions. You need to assure us that you’re happy with your gambling and you are under control.”

CLOSING **(HELPFUL AND RESPECTFUL)**

“Just to remind you that you are a valued customer and we’re not here to judge but to offer you help if you need it. Please feel free to come and talk with us at any time.”

CASH WITHDRAWALS FOR GAMBLING LOG

Venue:

Details	Date:	Time:	AM / PM	Amount(\$):	Staff name:
Description	Unique identifying feature (or name if known):				
	Sex: <input type="radio"/> Male <input type="radio"/> Female Age: <input type="radio"/> 20-30 <input type="radio"/> 30-40 <input type="radio"/> 40-50 <input type="radio"/> 50-60 <input type="radio"/> 60+ Ethnicity: <input type="radio"/> Pākehā <input type="radio"/> Māori <input type="radio"/> Pacific Islander <input type="radio"/> Asian <input type="radio"/> Indian <input type="radio"/> Other				
Withdrawal	<input type="radio"/> First <input type="radio"/> Second or subsequent <input type="radio"/> Other signs – Intervention & Incident Report Required				
<input type="radio"/> Interacted with customer/asked if Everything is OK _____ _____ _____ _____					
<input type="radio"/> Monitor/Observe/Record <input type="radio"/> Approach player on return to venue					

Details	Date:	Time:	AM / PM	Amount(\$):	Staff name:
Description	Unique identifying feature (or name if known):				
	Sex: <input type="radio"/> Male <input type="radio"/> Female Age: <input type="radio"/> 20-30 <input type="radio"/> 30-40 <input type="radio"/> 40-50 <input type="radio"/> 50-60 <input type="radio"/> 60+ Ethnicity: <input type="radio"/> Pākehā <input type="radio"/> Māori <input type="radio"/> Pacific Islander <input type="radio"/> Asian <input type="radio"/> Indian <input type="radio"/> Other				
Withdrawal	<input type="radio"/> First <input type="radio"/> Second or subsequent <input type="radio"/> Other signs – Intervention & Incident Report Required				
<input type="radio"/> Interacted with customer/asked if Everything is OK _____ _____ _____ _____					
<input type="radio"/> Monitor/Observe/Record <input type="radio"/> Approach player on return to venue					

Details	Date:	Time:	AM / PM	Amount(\$):	Staff name:
Description	Unique identifying feature (or name if known):				
	Sex: <input type="radio"/> Male <input type="radio"/> Female Age: <input type="radio"/> 20-30 <input type="radio"/> 30-40 <input type="radio"/> 40-50 <input type="radio"/> 50-60 <input type="radio"/> 60+ Ethnicity: <input type="radio"/> Pākehā <input type="radio"/> Māori <input type="radio"/> Pacific Islander <input type="radio"/> Asian <input type="radio"/> Indian <input type="radio"/> Other				
Withdrawal	<input type="radio"/> First <input type="radio"/> Second or subsequent <input type="radio"/> Other signs – Intervention & Incident Report Required				
<input type="radio"/> Interacted with customer/asked if Everything is OK _____ _____ _____ _____					
<input type="radio"/> Monitor/Observe/Record <input type="radio"/> Approach player on return to venue					



EXCLUSION ORDERS

THE THREE KINDS OF EXCLUSION ORDERS

- 1 **Manager Initiated Exclusions** (by the venue)
- 2 **Self Initiated Exclusions** (by the player)
- 3 **Multi-Venue Exclusion** (by a problem support provider)

The above will appear under POI on your QEC Unit at the Bar

! You must issue an Exclusion Order if requested !

1 MANAGER INITIATED EXCLUSION

- Issued by the Venue
- Profile has been established by Incident Reports
- Preferred exclusion instead of Self Initiated

3 MULTI-VENUE EXCLUSION

- Requested by a Problem Support Provider
- A person who has decided that they have a problem with their gambling will approach a support provider for support and assistance
- The exclusion will appear on your QEC unit at the Bar for you to accept
- New Exclusions once accepted will have a blue frame around them

FOH staff are to contact your DM/VM immediately for assistance if someone is seeking to Self initiate an exclusion.

Exclusion order



Section 309 and 310 of the Gambling Act 2003

Gambler's details

To	<input type="text" value="James Smith"/>
	<small>Name</small>
Of	<input type="text" value="4 Leafy Grove, Auckland"/>
	<small>Address</small>
Date of birth	<input type="text" value="18/4/78"/>
ID	<input type="text" value="Driver licence - ref 12345678"/>

Prohibition details

Take notice that pursuant to section 309 of the Gambling Act 2003 you are prohibited from entering

<input type="text" value="JOE'S BAR"/>
<small>Insert name of venue</small>

For a period of

<input type="text" value="9 months"/>	<input type="text" value="9/5/25"/>
<small>Months/years (insert exclusion period up to a maximum of two years) from the date of this notice because: (tick the option below that applies)</small>	<small>Expiry Date</small>

- Or
- (a) you have identified yourself as a problem gambler and requested that you be excluded from the above-named venue (Player Initiated or requested MVE);
 - (b) there are reasonable grounds to believe you are a problem gambler (Manager Initiated).

If you breach this exclusion order and re-enter the above-named venue within the specified time period you commit an offence under section 312 of the Gambling Act 2003 and will be liable for a fine of up to \$500.00. The Venue Manager or person acting on the Venue Manager's behalf will be required by law to remove you from the premises and the Police may be requested to assist in your removal.

Signatures

Venue Manager	Signature of Venue Manager or person acting on the Venue Manager's behalf
	<input type="text" value="Signature"/>
	<input type="text" value="9/8/24"/>
	<small>Date</small>

Gambler	Signature of gambler (not required for MVE)
	<input type="text" value="Signature"/>
	<input type="text" value="9/8/24"/>
	<small>Date</small>

I give permission to use my information including my image for the purposes of supporting my exclusion order. Copies of the personal information provided on this form will be held at the above-named venue and at Pub Charity Limited Head Office and in any approved database as part of the Pub Charity Limited Problem Gambling and Harm Minimisation Awareness policy. Any queries regarding this information should be directed to; Pub Charity Limited, PO Box 27-009, Wellington

Copy 1: Post to Compliance Manager Pub Charity Limited, PO Box 27-009, Wellington

GENERAL GAMING

STAFF REQUIREMENTS

You have to know:

- Where the Harm Min Policy is kept if requested
- Know how to apply the Harm Minimisation Policy
- Complete a Player Dispute/Machine Malfunction Report
- Complete an Unpaid Prize Report

MACHINE FAULTS/PLAYER DISPUTES

- Take a photo of the screenshot of the machine if possible. Turn off the machine **immediately**
- Why?
- Procedure as outlined in full in Gaming Bar Book
- Key parts of the form Section #1 and #3

VENUE STAFF APPLY THE HARM MINIMISATION POLICY BY

- Monitoring and interaction with customers
- The observation, recognition and assessment of potentially problematic gambling behaviour
- Accurate recording of observations and incidents
- Making timely and effective interventions
- Providing appropriate information; and
- If required, managing the Exclusion Process

UNPAID PRIZE REPORT

When is this completed?

- Underage
- Money left on gaming machine (Walk away)
- Breach of Gaming Rules i.e. Syndicated Play
- Playing two machines at the same time
- Fault or Malfunction of Gaming Equipment

FOH staff are to contact your DM/VM immediately if approached by a player so they can complete required actions.

THESE FORMS SHOULD BE COMPLETED WHEN:

You can't sort the issue and you need to call a tech or someone from outside the venue and the player has to wait for a solution.

EQUIPMENT FAULTS AND PLAYER DISPUTES

A GUIDE TO COMPLETING THE FORM

Gambling Equipment Faults, Unpaid Prizes and Player Disputes can occur at any time and to any staff member at your venue. It is important to act quickly and in accordance with the regulations. However we understand this can be a very daunting process especially with less experienced staff.

Here are some key steps, if followed correctly, that can make your experience a whole lot easier.

STEP
1

FREEZE THE SCENE

As soon as a fault and/or player dispute has been identified, venue staff must attempt to "Freeze the scene and preserve all available evidence". We suggest placing an "Out of Order" sign on the affected equipment ensuring no further play can occur while the staff member begins investigations.

STEP
2

CALL THE TECHNICIAN

Call your local Service Technician to come to the venue. Service Technicians are fully trained in accessing and gaining the relevant information required for fault and/or player dispute investigations.

STEP
3

DO THE PAPERWORK

Using the Department's Gambling Equipment Fault / Player Dispute Report (located in your Gaming Bar Book) record all relevant details of the problem. This form can sometimes seem overwhelming but it is important to fill it out at the time of the event. The Pub Charity Limited team is here to help and we encourage you to call your local Area Manager if you are uncertain about anything – they can refresh your memory and walk you through the form.

STEP
4

NOTIFY EVERYONE

It is now the time to notify your Area Manager of the event and also advise the player that he/she will be notified by Pub Charity Limited directly on the outcome or further investigation required (Gaming Rule 52) within seven working days.

Important: If the problem involves unpaid prizes or withheld credits, money **MUST NOT** be paid out to the player until the event is fully investigated by Pub Charity Limited. If you pay the player and the investigation shows they are not entitled to the money, then you will likely be out of pocket.

STEP
5

SEND THE FORM TO PUB CHARITY LIMITED

Forward the completed form through to Pub Charity Limited who will now complete the process. It is highly likely you Area Manager will be in touch to obtain additional evidence around the event. This may include reports from staff, CCTV footage and any relevant venue records. A full investigation will then be conducted by our Compliance Team with any further action and the outcome communicated back to both the Venue and Player.



REMINDER:

In some cases the Gambling Equipment Fault / Player Dispute is resolved within the same day. In this case we may advise payment via the venue can be made to the player and/or the equipment switched back on.

In all other cases when money is withheld please remember IT MUST be banked into the Pub Charity Limited bank account separately to your weekly GMP. Pub Charity Limited will organise a transfer of the funds directly into the Player's bank account after the investigation if this is the correct outcome.

We recognise this may be frustrating for your Players but it will protect you from paying out winnings that may not be valid and could potentially leave you out of pocket.

On the following pages you will find a quick guide on which parts of the mandatory DIA Gambling Equipment Fault / Player Dispute Report form are vital to be filled out and where to locate the relevant information to complete it.

WHAT TO SAY TO THE CUSTOMER:

When there are disputes or faults, it can be difficult dealing with players who want to be paid out. Let them know everything that happens on the machine is recorded, and what happens in the room is recorded too. Tell them the technicians and the Pub Charity Limited team will be able to look at all the information and sort this out for them as soon as possible.

UNPAID PRIZES

YOUR LEGAL OBLIGATION

Report all unpaid prizes – Venue staff are required to promptly take the appropriate action when a prize is not paid out.

It is important that any instances of unpaid prizes are acted upon quickly and in accordance with the regulations. Refer to The Gambling Act (Class 4) Game Rules 2016.

Note: Gaming Rule No.7: If a malfunction of any gaming equipment occurs and a valid winner cannot be determined, no player is entitled to payment of a prize.

If you can't determine a winner please contact your Area Manager for further instructions. If you are in doubt please call the Pub Charity Limited Help Line 0800 42 64 64.

UNPAID PRIZES

When a prize is not claimed in your venue, staff must:

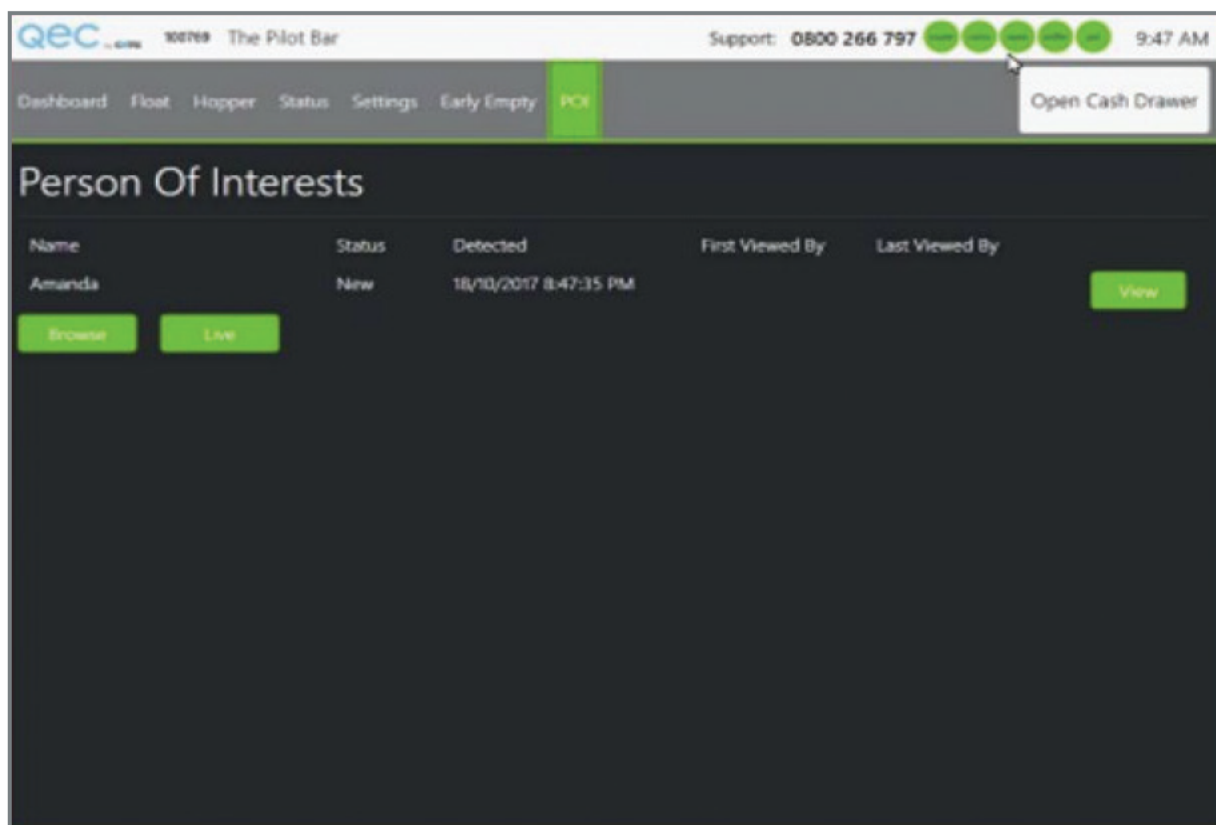
- STEP 1** Complete an “Unpaid Prize Report” as soon as possible and give the ‘original’ (white) copy to the player as a receipt.
- STEP 2** Record any other relevant details in the “Incident and Observation Register” and report the incident to your Pub Charity Limited representative.
- STEP 3**
 - A)** Send ‘copy 1’ (yellow copy) to Pub Charity Limited.
 - B)** Retain ‘copy 2’ (pink copy) within this section.
- STEP 4** Ring Pub Charity Limited to tell us what’s happened, and bank the money (into the Pub Charity Limited bank account) as a separate deposit as Gaming Machine Profit.

FACIAL RECOGNITION

FACIAL RECOGNITION (POI)

Operates from your QEC Unit

- Audible alarm will sound and a warning will be displayed on the screen
- Press Close on the Warning Screen
- Select POI tab and VIEW (Pin Required)
- Proceed as per the instructions in the Guardian Manual
- Identify when detected and record actions in the Incident Register



HOW TO APPROACH

- 1** Find the person who has been detected in the room
- 2** Ask them to accompany you outside the room
- 3** Advise that you have Facial Recognition and they have been identified as having an exclusion current at this venue
- 4** Ask for ID to prove who they are
- 5** If they can't supply ID then they cannot go back in the room
- 6** Staff are to collect any credits that may have been left on the machine and follow the usual payment process with the person
- 7** Ensure an Incident Report is completed

HARM PREVENTION AND MINIMISATION POLICY

2024



POLICY OBJECTIVE

Pub Charity Limited (**PCL**) venues will provide a safe, responsible gaming environment for gaming customers where staff take proactive steps to ensure the potential for harm is minimised or prevented and customers accessing gaming at a PCL venue can make informed decisions about their participation.

All venue staff members involved with gaming will be provided with information and be adequately trained to be competent and confident in their understanding of the issue of problem gambling and their regulatory obligations to effectively respond as required through;

- ✓ **Monitoring** player behaviour;
- ✓ **Identifying signs of problem gambling**
- ✓ **Observing & interacting**, recognising and assessing potentially problematic gambling behaviour;
- ✓ **Recording** observations and incidents;
- ✓ Making timely and effective **interventions**;
- ✓ Providing appropriate **information**; and
- ✓ If required, managing the **Exclusion Process**.



Section 4 of the Gambling Act 2003 states:

“A Problem Gambler means a person whose gambling causes harm or may cause harm”

Harm means;




“Harm or any distress of any kind arising from, or caused or exacerbated by a person's gambling, this includes personal social or economic harm suffered by any person, their spouse or partner, family, whanau, workplace, community, or society at large.”

MONITORING PLAYER BEHAVIOUR

Gambling behaviour is as varied as any human activity. Determining from observation alone whether a person is experiencing adverse consequences from their gambling, and even more so when others are being affected, can be difficult.

Our procedures have been developed to provide a consistent and effective best practice response to obligations that come with hosting Class 4 gaming machines. The objective of the implementation of these measures is that the harm from gambling activity at PCL venues should be wherever possible prevented or minimised.

When monitoring player behaviour staff will need to assess players based on risk profiling:

 <p>No (low) risk</p>	<p>Signs of No Risk behaviour can include:</p> <ul style="list-style-type: none"> ✓ Calm and enjoying play ✓ Irregular player/social play ✓ Limited playing time ✓ Few if any EFTPOS withdrawals (no declines)
 <p>At risk</p>	<p>Signs of At Risk behaviour. Indications a person may be experiencing adverse consequences from their gambling can include:</p> <ul style="list-style-type: none"> ✓ Frequent attendance in the gaming area ✓ Long sessions of play (playing for extended periods) ✓ Declined EFTPOS or ATM transactions ✓ Changing low denomination coins or requesting small EFTPOS withdrawals to gamble ✓ Being argumentative while gambling or complaining about fairness of games ✓ Any noticeable increase in the frequency of gambling or amounts spent ✓ Unusual behavioral routines when gambling ✓ Max betting and frequent use of the 'double-up' feature
 <p>High risk</p>	<p>Signs of Gambling Harm (Harm Min Regs 2023)</p> <ul style="list-style-type: none"> ✓ 2 or more EFTPOS or ATM withdrawals to gamble ✓ Long session of play (playing for 3 hours or more)/Identified gambling during 9 consecutive room sweeps ✓ Borrowing or attempting to borrow money to gamble from the venue or others ✓ Leaving children unattended ✓ Waiting for the venue to open to gamble ✓ Refusing to stop or appearing to be unable to stop gambling (when the venue is closing) ✓ Appearing visibly distressed, such as damaging the gaming machine <p>Other 'Strong' Signs</p> <ul style="list-style-type: none"> ✓ Prioritising gambling above family, friends, employment, self (hygiene) ✓ Disorderly or abusive behaviour ✓ Admissions or self-disclosure by the individual that he/she is a problem gambler and has suffered harm or that his/her gambling has caused "others" harm. Such disclosure may be a full disclosure, a partial disclosure or a veiled disclosure; for example, "I don't know how I will pay this week's rent" ✓ Evidence (documented and verified) supplied by a family member or significant other that harm has been caused by the person's gambling ✓ Any evidence of harm brought to the attention of the Venue Manager or other venue staff.

PLAYER OBSERVATIONS AND INTERACTION

Staff and management are committed to ensuring that gaming customers access gaming in their venues in a safe and responsible manner. Staff will take a pro-active role in establishing relationships with customers, both on entering the premises and throughout the time that they are in the gaming room.

The purpose of this activity is to open a line of communication and establish a rapport with players that, along with ongoing monitoring and observation, will allow for an assessment of their well-being.

Gaming room management/room sweeps

A room sweep is;

“Venue staff will undertake sufficient additional gaming area/ room sweeps at least **3 times per hour** and **at least 10 minutes apart**.

in relation to a class 4 venue, a room sweep means the physical observation of a place where gaming machines are located to—

(a) observe player behaviour; and

(b) monitor for signs of harm, including;

- For the purposes of these regulations, the signs of harm include (without limitation) the following:
 - withdrawing, or attempting to withdraw, cash from an automatic teller machine or EFTPOS device on 2 or more occasions in 1 day to use for gambling at the venue:
 - gambling during 9 or more consecutive gambling area sweeps:
 - attempting to borrow money from venue personnel 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).

Staff undertaking room sweeps will interact with players where possible for the purpose of establishing communication and rapport, and assessing the well-being of those in the room, including identifying signs of gambling harm and, if applicable, removing excluded persons and minors.

Staff should be noting durations of play, player gambling intensity, and players accessing cash from EFTPOS and ATMs (if applicable), while looking for any signs of emotional distress (A.T.M.), and intervening as required.

Staff must take all reasonable steps to identify whether a player has been gambling during 9 consecutive room sweeps, including recording sufficient information manually by completing a room sweep log, or through record keeping from applicable CCTV technology, to identify the players present during initial and subsequent room/area sweeps.

A record of all room sweeps must be maintained, including the time, date and staff member completing the sweep, the number of players in the room, and whether the sweep resulted in an **Incident and Observation Report (IOR)** being completed.

Continuous presence and continuous play

Staff will monitor duration of play of players in the gaming room, completing an Incident and Observation Report (**IOR**) and intervening where continuous play or continuous presence **exceeds 3 hours, or 9 room sweeps**.

Where the period of play is considered excessive in the circumstances, exceeds 3 hours, or the player is present and gambling during 9 consecutive room sweeps, staff will interact with the player to assess their well-being and assist with identifying whether the player is a problem gambler, provide the appropriate information, and complete an IOR. If applicable, staff might encourage the player to take a break or terminate the player's session of play.

Cash Advances & Self-Imposed Limits

EFTPOS & ATM access

Gambling on gaming machines is a lawful activity when carried out within the constraints of the Gambling Act 2003 and regulations. All requests for cash advances and use of on-premise ATMs will be supervised by trained venue staff.

PCL venues may or may not have arbitrary or mandatory limits on the amount of money that can be obtained using EFTPOS or ATMs, but all transactions must be considered in the context of customer behaviour including whether they are showing signs of problem gambling, and/or whether the customer has a history of problems known to the staff.

All requests for cash advances on EFTPOS and overall money limits will be assessed on a case-by-case basis. From 1 December 2023, any second or subsequent request to withdraw cash via EFTPOS, or access of cash from an ATM for gambling, requires staff to interact with the player to assist with identifying whether the player is a problem gambler. The interaction must be recorded by completing the appropriate records.

Providing credit to a player to gamble is strictly prohibited.

EFTPOS request declines and small amount withdrawals

Multiple EFTPOS declines or requests for small amounts of cash may result in a refusal of service. The procedures for managing these situations are outlined below. An IOR should be completed.

Breaking self-imposed spending or EFTPOS withdrawal limits

The breaking of self-imposed limits on EFTPOS withdrawals may result in a refusal of service. The procedures for managing these situations are outlined below. An IOR should be completed.

RECORD KEEPING

Incident and Observation Reports (IOR)

Venue staff will use an IOR to record abnormal or problematic gambling behaviour including, but not limited to:

- ✓ Signs of gambling harm:
- ✓ 2 or more withdrawals of cash to gamble;
- ✓ Continuous play in excess of 3 hours;
- ✓ Multiple general or strong signs of problem gambling, or any serious anti-social incident in and around the gaming room.

Where multiple general signs are observed in a single incident, or over time, staff should use the IOR to build a profile and record of the gambler's behaviour to assist in subsequent interventions and allow for information to be shared to ensure appropriate outcomes.

Weekly review of IORs, room sweep logs and ATM/EFTPOS logs

These reports will be collated and reviewed weekly by the **Venue Manager** or a person delegated to do so, in order to:

- ✓ Assess whether the venue personnel have taken appropriate action following the identification of 1 or more signs of harm in a player;
- ✓ Assess whether further action is required in respect of a player; and
- ✓ Determine whether there are any players the Venue Manager, or the person acting on their behalf, has reasonable grounds to believe are problem gamblers.

The Venue Manager, or the person acting on their behalf, after reviewing the records, must record:

- ✓ The date of the review; and
- ✓ any further action taken as a result of the review.

The **Venue Operator** will ensure all records are retained for a period of **no less than 3 years**.

Record Keeping of Exclusion Orders

The venue must maintain on the premises, either electronically or in paper format, a record of all current Exclusion Orders applicable to that venue.

INTERVENTIONS

General and strong signs of gambling harm

Staff will intervene where they observe the signs of problem gambling that apply from 1st December 2023. An appropriately trained venue staff member will approach the player and have a conversation to determine their state of welfare for the purpose of their continued gambling or a denial of service.

Whenever a conversation takes place, details of the interaction should be recorded in an IOR and consideration given to providing a Yellow Card (information), or to whether an exclusion is applicable.

Player and Manager initiated exclusion orders and Multi Venue Exclusion (MVE) requests

Staff may, when signs of problem gambling are observed, or as a pre-determined follow-up to a previous incident, or at the direction of the Venue Manager or Venue Operator, complete a Manager-Initiated Exclusion Order for the player concerned. Where appropriate, staff should be proactive and issue a Manager-Initiated Exclusion.

If a player requests a Self-Exclusion (Player-Initiated), staff must respond immediately and take the player through the exclusion process.

Information (Red Card) must be provided for both Manager-Initiated and Player-Initiated Exclusions.

The venue may receive by email, COMS or postal mail a MVE request from a player who may or may not be known to the venue. The venue manager, or person delegated by the manager, must treat such a request in the same manner as a player-initiated request.

On verification of the provision of an appropriate authority from the player, and the provision of an adequate means of identification, the venue should at the first opportunity complete an Exclusion Order and return it to the applicant's contact address provided.

Any questions by staff concerning the issuing of an Exclusion Order should be escalated immediately to the relevant PCL representative.

Removal of Minors and Excluded Persons on detection

Venue staff must maintain a line of sight to the entrance to the gaming room and undertake regular sweeps of the gaming room in order to monitor for the presence of excluded persons or minors in the gambling area.

Whether an excluded person or minor is identified physically or automatically by way of facial recognition systems the staff must act immediately to remove that person from the gambling area. Any such incident must be recorded by way of completion of an Incident and Observation Report.

INFORMATION FOR PLAYERS

Yellow/red cards

Staff and management will provide players with an appropriate level of information, as outlined in the procedures below, when general signs (Yellow Card) and strong signs (Red Card) of problem gambling are observed. Red Cards are also provided when both Manager and Player-Initiated Exclusion Orders are issued by staff.

The cards provided comply with the appropriate regulatory requirements and should be issued in a discreet fashion.

Player disputes/equipment faults/unpaid prizes

Staff will respond to any dispute over a gaming prize raised by a player, between players, or by staff themselves, completing the appropriate Player Dispute Form.

Staff will respond to and complete the appropriate form as required for any Equipment Faults or where prizes are unpaid for any reason (see Procedures).

All normal day-to-day EGM Faults not requiring completion of Equipment Fault forms will be reported to the relevant service provider for the venue so that records can be made available if required by the DIA.

DIA AUDITS

Should the venue be visited by the DIA for the purpose of auditing or for any other reason, the Venue Manager will cooperate fully with any requests and requirements. The Venue Manager will collect the Gaming Bar Book, Incident and Observation Register, Exclusion Order Folder and all supplementary Training records and present this to the DIA immediately. All questions will be answered honestly to the best of that staff member's knowledge.

INFRINGEMENT FEES

From 1 December 2023 new infringement fees may be issued by the DIA for the following:

<p>The Venue Manager is personally liable to a \$1,000.00 fine in each of the following events:</p>	<ul style="list-style-type: none">a. Failure to undertake a sweep.b. Failure to record the required information in relation to a sweep.c. Failure to have a conversation with a player who has exhibited 1 or more signs of harm.d. Failure to record the required information in relation to identified signs of harm.e. Failure to review incident records, or ensure another person reviews records, for at least the previous 7 days, at least once each week.
<p>The Venue Operator is liable to a \$1,000.00 fine in each of the following events:</p>	<ul style="list-style-type: none">a. Failure to ensure that gaming machines are not visible from outside the venue (except intermittently when an external door is in use).b. Failure to ensure that records are kept for at least 3 years after the date on which they were recorded.

FACIAL RECOGNITION (FR) SYSTEMS (IF INSTALLED)

Staff will respond to the detection of POI or excluded persons and high-risk gamblers.

Should QEC through **Person of Interest (POI)** detect a suspected excluded gambler, staff will respond immediately, identifying the gambler and taking the appropriate action in removing such person from the venue and completing all appropriate documentation, namely an Incident and Observation Report.

Time In Venue (TIV) software uses the FR system to indicate if a person is detected in the gaming room 3 hours after first being recorded. The TIV system does not record breaks in play and as such should not be seen as a confirmation of continuous presence, but staff are required to follow up on a TIV alerts in COMS and investigate.

If installed the COMS Room Sweep Module will record staff room sweeps and identify persons present during the previous sweep and allow for confirmation of continued presence. Any person detected as present and gambling during 9 consecutive sweeps must be approached and spoken to in order to assess their well-being, an IOR completed, and information provided.

VENUE RESOURCES AND PHYSICAL ENVIRONMENT

Pub Charity Limited as the venue's gaming society will supply the venue with harm minimisation and prevention brochures, posters, signs, notices, and an electronic or static compliance board and the venue must clearly display these resources in the gaming area as required.

Information includes advice for the player about the existence of this policy and the odds of winning on a gaming machine, encouraging players to bet at a level they can afford, as well as detailing the signs of problem gambling and how to get help.

Staff will need to consider their own gaming room; they should maintain good line of sight from the working area of the bar to the main entrance of the gaming room so they can monitor players entering the room in order to detect and, where possible, prevent minors and excluded persons from accessing class 4 gambling.

PCL will also provide adequate CCTV coverage of the gaming room and entrances. Any ATM on the premises must be in line of sight of staff.

Restrictions on jackpot advertising and branding

The Venue Operator must ensure that no advertising relating to a gaming machine jackpot at the class 4 venue is published inside or outside the venue in a way that makes the gaming machine jackpot advertising visible or audible to persons outside the venue.

The Venue Operator must also ensure that any advertising or promotion by the venue does not include the word 'jackpot' or convey explicitly or implicitly in any way, including using other words or get-up, that there is a gaming machine jackpot at the venue.

UNDER AGE GAMBLERS

The venue must have a strict policy on underage persons in the gaming room and no exceptions should be tolerated.

- ✓ Every person under the age of 18 commits an offence and is liable to summary conviction to a fine not exceeding \$500.00 if they participate in gambling at the venue.
- ✓ Every corporate society that allows a person under the age of 18 to participate in gambling commits an offence and is liable on summary conviction to a fine not exceeding \$5,000.00.
- ✓ Every Venue Manager or key person employed at a Pub Charity Limited venue who allows a person under the age of 18 to participate in gambling commits an offence and is liable on summary conviction to a fine not exceeding \$1,000.00.
- ✓ Prizes or prize winnings must not be paid to an underage person.

EVIDENCE OF AGE & IDENTITY

If venue staff are unhappy with a person's age they should approach the person concerned and seek evidence of age documentation.

There are four forms of evidence of age and identity that are acceptable:

- ✓ Valid passport;
- ✓ New Zealand (photo) Driver's Licence;
- ✓ HANZ 18+ Card;
- ✓ Kiwi Access; or
- ✓ Firearms Licence.

IMPOSING LIMITS ON PLAYERS

Gambling is a lawful activity. The venue may wish to limit the amount of money that a customer can withdraw on EFTPOS considering whether any signs of harm or history of problems are identified.

Breaking self-imposed \$ or time limits

Staff must undertake a risk assessment of any player breaking self-imposed limits. If a player breaks a self-imposed limit in time or money spent venue staff may refuse further service reminding the player... "Remember you said no more...?"

Changing cash multiple times

Venue staff should be aware of players changing cash to gamble.

Withdrawing or cashing small amounts of money (less than \$10)

Staff will treat this on a case-by-case basis taking into account any other problem gambling signs that have been displayed or brought to their attention.

Attempts to borrow money

Attempts to borrow money from anybody for the purposes of gambling are a sign of problem gambling and intervention is required.

Long period of play

If the player is observed as present and gambling during 9 consecutive rooms sweeps, this will be considered a long period of play and the player spoken to.

Consideration should be made to the difference between Continuous Play v Continuous Presence, with continuous presence meaning that persons have had a break in their gambling, which does not constitute a long period of play.

If staff have asked "Is everything is OK?" and there are no other problem gambling signs, the player will be allowed to continue to play, but will be monitored and observed. An IOR may be completed.

SUMMARY

PCL will provide practical and interactive training to all venue staff who are involved in gaming and will also complete regular refresher courses within 12 months of previous training. Training will ensure venue staff are kept abreast of any changes in policy or any new requirements resulting from changes in the laws and regulations for Class 4 Gambling.

It is important that the venue advises PCL when new staff come on board so training can be provided as soon as practical. Untrained staff cannot be deployed to supervise gaming at the venue until trained by PCL.

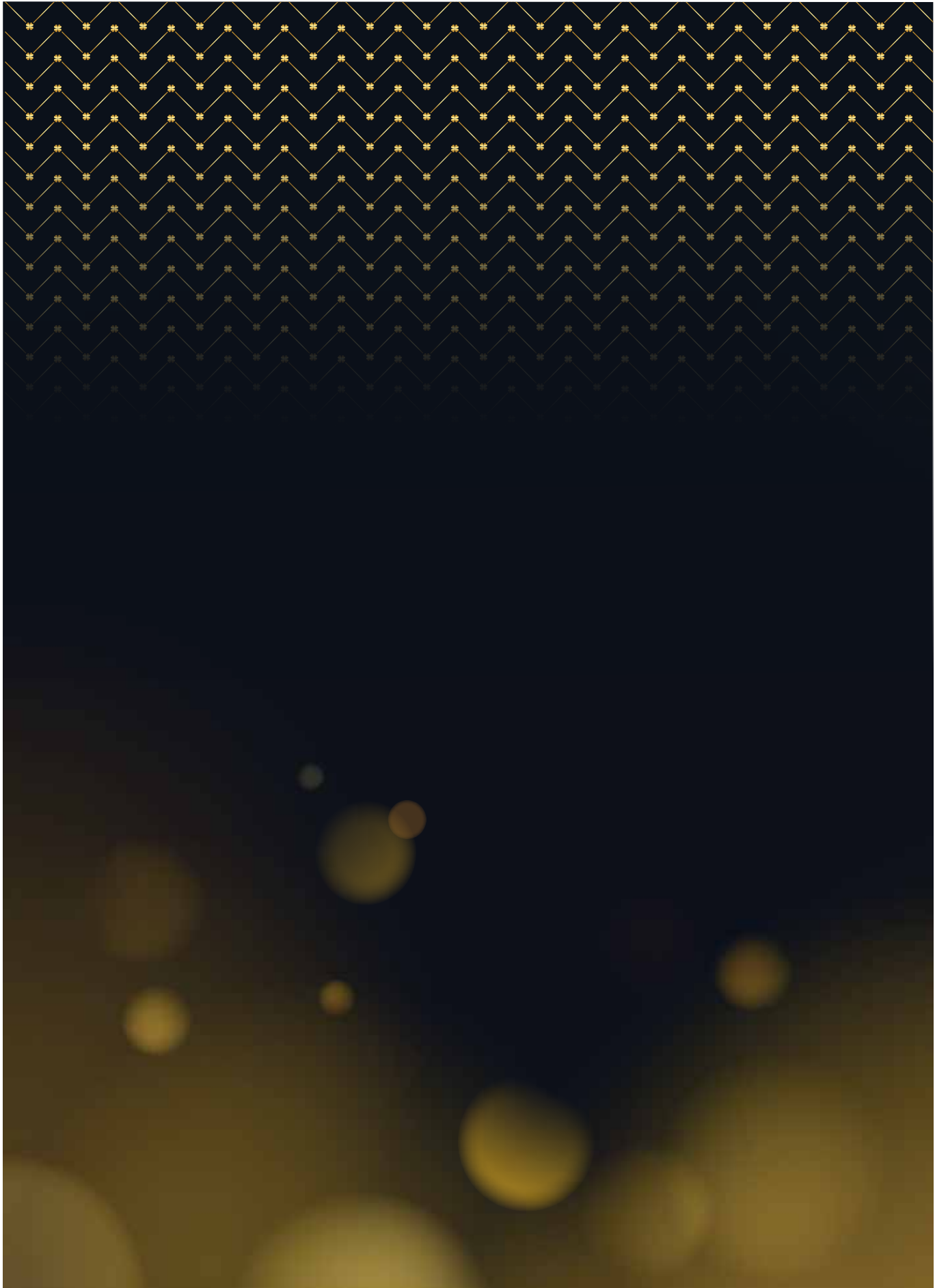
The training will include, but may not be limited to, a presentation and will ensure all staff can meet the following requirements:

A	Monitor for signs of harm , including conducting a minimum of 3 room sweeps per hour, monitoring player access to cash to gamble, and recording those incidents.
B	Initiating conversations with a player who may be experiencing harm.
C	How to interact with a player who is distressed or agitated.
D	Approach a player that the manager or employee has reasonable grounds to believe may be experiencing difficulties relating to gambling.
E	Provide information to a player about the characteristics of problem gambling (including recognised signs of problem gambling).
F	Provide information to a player about the potential dangers of problem gambling.
G	Provide information to a player about how to access problem gambling services.
H	Advise a player that they have reasonable grounds to believe that they are a problem gambler, and ban the player from the gaming area of the venue concerned for up to 2 years.
I	Advise a player that he or she can identify himself or herself as a problem gambler and request that the Duty Manager exclude them from the gambling area for up to 2 years.
J	How venue personnel can support problem gamblers through the exclusion process, including how to start conversations with players about the exclusion process and how players can access multivenue exclusions.

Training will also include the following:

K	Information about identifying the signs of gambling harm.
L	Basic information about how gaming machines work, including problem gambling behaviour associated with gaming. <ul style="list-style-type: none"> • First-hand accounts (which may be pre-recorded) from people who have experienced or been affected by harm and information about the types of harm.
M	Information about problem gambling services and other organisations that can provide support to people affected by harm.
N	Information about what resources are available to staff to help prevent and minimise harm including the procedure for Manager and Player Initiated Exclusion Orders.
O	In addition to IORs, staff will maintain records of all gaming room sweeps including; <ul style="list-style-type: none"> • the name or ID of the venue personnel who conducted the sweep; • the date and time of the sweep; • how many players were present in the gambling area during the sweep; and • if a gambling area sweep is not conducted because venue personnel could verify through other means that the gambling area was unoccupied by players, record that occurrence and what method was used to determine that.
P	Where signs of harm are identified (including 3 or more hours of continuous play and 2 or more cash withdrawals) an appropriate IOR will be completed, including the following information: <ul style="list-style-type: none"> • the name of the venue personnel who identified the sign of harm; • the date and time that the venue personnel identified the sign of harm; • any information that would help venue personnel to identify a player who displayed the sign of harm (for example, their name, if known, or a general description of their appearance); • which sign of harm was identified; • the name of the venue personnel who had the required conversation with the player; • the date and time that the venue personnel talked to the player; • a summary of any conversation with the player; and • any further action taken, or to be taken, in respect of the player.
Q	The Venue Manager must review, or ensure that a person reviews on their behalf, the records for at least the previous 7 days, at least once each week, to: <ul style="list-style-type: none"> • assess whether the venue personnel have taken appropriate action following the identification of 1 or more signs of harm in a player; • 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.
R	The Venue Manager, or the person acting on their behalf, after reviewing the records, must record: <ul style="list-style-type: none"> • the date of the review; and • any further action taken because of the review.

The Venue Operator must ensure that information recorded is retained for a period of **3 years** after the date on which it was recorded.



HISTORIC

Luggate Hotel

60 Main Road,

Luggate 9383

Tel: [03 443 8523](tel:034438523)

Email: info@luggate.co.nz

Website: www.luggate.co.nz



Bar // Café // Restaurant // Beer Garden // Accommodation // General Store

14 May 2026

To Whom It May Concern

This letter serves to confirm that I, Rodney Bowler give permission as the owner of the property, named The Luggate Hotel, at 60 Main Road, Luggate for the Lessee, Sticks Dream Ltd TA The Luggate Hotel, to apply to the Queenstown Lakes District Council through Pub Charity to operate gaming machines at the Hotel.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'Rod Bowler', with a long horizontal flourish extending to the right.

Rod Bowler

Owner

RandR Investments