

Harm Minimisation Policies

2024



Introduction

Class 4 Gambling is looked upon as just another form of entertainment for most people, however it is openly acknowledged that there are some who do find it difficult to keep within acceptable limits and therefore will experience negative outcomes as a result of their gambling. Sadly, it affects their families and friends in many instances as well.

The Trusts Community Foundation, hereafter referred to as TTCF and/or this Foundation, is totally accepting of the fact that every Class 4 Gambling society has a role to play in developing a set of policies that will assist key venue personnel meet their obligations in terms of harm prevention, firstly by being able to identify signs of harm and secondly having the knowledge and skills to deal with any situation.

TTCF is conscious of the fact that any training provided to venue personnel must meet the requirements as specified in clauses 13(2) and 13(3) of the Gambling (Harm Prevention and Minimisation) Regulations 2004 (2023 version).

Current Strategies

Each venue is provided with a comprehensive Resource Kit that contains the items listed in **Appendix 1** and these are updated and/or refreshed on an as required basis.

1. An online training module was developed in 2021. It was designed primarily as a basic education process for inductees and so provides a general overview for any new employee that is designated to play a role in supervising the gaming machine operation at a venue. In recent times all venue personnel were encouraged to undergo the training process for a second time as a refresher. The uptake was almost 100% which was rather gratifying.
2. Area Managers are aware of the requirement that face-to-face training must be provided on at least an annual basis. To date they have provided face to face training, both as a follow up to the online process as well as ensuring that key personnel are brought up to speed with any new sector related developments e.g., before and after the new Regulations came into effect on December 1st, 2023. TTCF has adopted the approach that training will be provided on an ongoing rather than a one-off basis.

Future Strategies

1. A second online training module is currently under development. It is scheduled to be completed by 30th September 2024, with the intention that key venue personnel will undergo this part of their training shortly thereafter. The primary focus of this module is all aspects of harm prevention.
2. Area Managers will provide face to face training, both as a follow up to the online process as well as ensuring that key venue personnel are brought up to speed with any new sector related developments on an ongoing basis.

TTCF intends developing and introducing further online training modules in the future.

Ongoing Venue Support

Area Managers are committed to providing all key venue personnel associated with supervising a TTCF gaming machine operation with the necessary harm prevention and minimisation related training. This is applicable to both existing personnel and also new venue operators as well as any new key venue personnel appointees. They will receive face to face training and support as soon as practicably possible after they take over the business and/or commence employment. This will include them going through both online modules.

All training interactions at each venue will be entered into a Training Register for future reference.

The TTCF Administration office proactively contacts every venue operator at least once a month to check whether or not there are any new staff members that require training and/or any existing personnel who feel they need some additional training. Area Managers also check on general training needs and provide sector updates as part of their normal call cycle visits.

Area Managers conduct regular compliance assessments at each venue, with a particular emphasis on ensuring that:

1. Venue operators/managers/key personnel are taking their harm minimisation obligations seriously, particularly when it comes to identifying any person that is displaying the signs and then dealing with the situation appropriately.
2. Gaming Room Sweep Reports and Incident Registers are being properly utilised.
3. All required signage is displayed appropriately in and around the gaming area. Refer to **Appendices 2-6**.
4. All key venue personnel know where to find the TTCF Venue Resource Kit and are familiar with the contents thereof.

Area Managers have checked all venues to ensure that the ATM is in sight of the main service area and neither the gaming machines nor the jackpot signs are visible from outside the venue. DIA has been provided with updated floor plans where applicable.

Venue Personnel Obligations

While TTCF is required to assume overall responsibility for ensuring that appropriate systems and procedures are developed and implemented, the Regulations actually place an immense amount of onus on venue operators to ensure that they and their key employees have received all necessary training and are totally aware of their obligations when it comes to supervising the gaming machine operation throughout the time the gaming machine area is open to the public.

TTCF has continually advocated that should the venue operator/manager not be available during any particular shift or part thereof then they must formally delegate a fully trained and capable staff member (whose training included problem gambling awareness training) to take responsibility during their absence at all times gambling activities are available to players.

The venue operator/manager must ensure that someone fitting the above criteria is on hand to take responsibility throughout the time that the gaming area is available to members of the public.

It must be noted that because the legislation deems a venue operator to be ultimately responsible, it is imperative that they choose wisely and ensure the person or persons they assign to the supervisory roles are totally aware of their obligations and responsibilities and carry them out accordingly.

Specific Tasks

1. Regardless of who performs the day-to-day supervision, the venue manager is required to review gaming area sweep records and incident registers on at least a weekly basis. They are also obliged to record details of any follow up they have had with staff members and/or players at the time they sign off their review. Refer to **Appendix 11**.

This review serves several purposes i.e.

- Assessing whether or not appropriate action was taken after a player had been identified as exhibiting a sign or signs of harm.
 - Determining if further action needs to be initiated in relation to any player who has had their behaviour noted.
 - Identifying players for whom there are reasonable grounds to believe they may be problem gamblers.
2. With reference to clause 11, TTCF's Resource Kit provides pamphlets for the venue and venue operators/managers/key venue personnel have been advised that these must be available in the gaming area at all times. These pamphlets give information to players in relation to the odds of winning on gaming machines and the characteristics of problem gambling, including the recognised signs of harmful gambling and how to seek advice for problem gambling. Area Managers check that these are on display during every visit and if there is an issue, they take the matter up with the venue operator/manager directly.
 3. With reference to clause 11 (b), TTCF's Resource Kit provides signage for the venue and venue operators/managers/key venue personnel have been advised that these must be clearly visible to players at all times. The signage is designed to encourage players to gamble at levels they can afford and contains advice about how to seek assistance for problem gambling.

4. As stated previously, Area Managers have assessed all of our venues to ensure that jackpot signage and gaming machines are not visible from anywhere outside of the venue. Venue operators have been advised any gambling related advertising and promotions must comply with clauses 9 & 10 and that should they wish to make any alterations within the venue they should consult with the Area Manager beforehand.
5. Venue operators/managers/key venue personnel have been made aware that providing credit for gambling at the venue is prohibited. They have also been advised that whoever is supervising the gaming area must be vigilant in ensuring that no player is observed trying to borrow money from other patrons.
6. The main intention of conducting gaming area sweeps is to observe player behaviour in an effort to try and identify any individual that is showing possible signs of harm. From day one, TTCF has reinforced the need to make every endeavour to identify players that have been present during 9 consecutive sweeps and to take note of any behavioural issues.
7. A gaming area sweep must be carried out 3 times an hour with at least 10 minutes between sweeps. **Appendix 7** contains a copy of our current room sweep report. This is a work in progress and any necessary modifications will be incorporated in each ensuing reprint.
8. If the gaming area is empty during a sweep, the person responsible must record the method they used to verify that the gambling area was unoccupied.
9. Venue operators/managers/key venue personnel have been advised that they are required to record the following details:
 - When a player is first observed during a sweep of the gambling area, staff must note an identifying feature of the person in the sweep records. This could be their name or nickname or some other unique feature sufficient for staff to identify that person in subsequent sweeps. For example, a particular item of clothing may be noted.
 - Enough information to identify the player is required, as staff only need to know if that person is present for 9 or more consecutive sweeps.
 - During each sweep, staff note in the records whether the player under observation is present.
10. When a player has been noted as present for 9 consecutive sweeps, the person responsible must have a conversation with them.

11. While the 7 main signs are specified in **Appendix 8**, venue personnel have been encouraged to look for other behaviours that may signify the player has an issue.
12. The venue manager must ensure that they and/or key venue personnel consider whether any player is exhibiting one or more of the signs of harm, including those specified in **Appendix 8**.

Once the venue operator/manager/key venue personnel have identified a potential problem gambler they need to immediately initiate a conversation with them to try and establish whether or not the player is a problem gambler. The following options need to be offered:

- Provide information about the characteristics and dangers of problem gambling.
- Provide information about how to access problem gambling services
- Explaining and/or reminding the player about the self-exclusion process and how the player will be supported through this process and/or a multi-venue exclusion.

Details of any such conversations must be entered in the Incident Register for future reference. Refer to **Appendix 9**.

13. Venue operators/managers/key venue personnel must monitor and record details of EFTPOS and ATMs transactions on an ongoing basis. Where a person makes two withdrawals and both times are observed entering the gaming area and/or are seen playing a gaming machine, then a conversation to determine if gambling may be causing the player harm must be initiated and recorded. The same applies to any subsequent withdrawals.
14. The venue operator/manager/key venue personnel have an ongoing obligation to assist and support a player who has been approached and offered information, including the exclusion processes, but whose ongoing gambling or behaviour means there are still reasonable grounds to believe the person is likely to be a problem gambler. It may be that the only option under these circumstances would be to initiate the exclusion process.
15. There are two pads of exclusion orders provided in TTCF's resource Kit i.e. self-exclusion initiated by the player and/or a problem gambling service provider or a venue initiated order. It is imperative that these orders are issued at the time the discussions are taking place with the player concerned.

Some self-exclusions are multi-venue and are normally issued by the problem gambling service provider to the TTCF Administration Office. These are then forwarded on to all affected venues who must record the details provided. The Administration Office is able to monitor whether or not these have been actioned and they advise the Area Managers in these instances.

Once an exclusion order has been issued, either by key venue personnel and/or a service provider it cannot be rescinded and must not be issued for more than 2 years. If a player refuses to provide their name, date of birth and a recent photograph or consent to a photograph being taken then it is not an option.

16. Excluded persons must be monitored on an ongoing basis. With our higher turnover venues this is done by way of facial recognition. For the smaller venues it requires key venue personnel to regularly acquaint themselves with the names and identity of the affected parties. Where key venue personnel become aware that an excluded player has entered the gaming area, they must take immediate steps to have them removed.
17. A copy of all exclusion orders must be forwarded to the Administration Office for entering into their system.
18. Persons under the age of 18 must not enter the gaming area at any time and this includes infants. If key venue personnel suspect a player is under 18 then they must ask them to produce photo identification e.g., passport, driver's licence, etc. If they are unable to provide acceptable evidence, then they must be asked to leave the premises immediately.

Prize money must not be paid to any suspected underage players.

Notes:

1. In many instances the venue operator and venue manager are one of the same.
2. The venue manager is often not able to be present at the venue throughout the entire opening hours, hence the reference to key venue personnel.
3. Training will commence at the time DIA approves the venue licence for any new venue transferring to TTCF from another society. The rationale being that until the transfer is approved, they are obliged to abide by the current society's systems and procedures.

Appendix 1

TTCF's Resource Folder currently contains the following items:

- A copy of the Venue Licence including an approved list of gaming machines, jackpot (where applicable) and any special conditions imposed by the Secretary of Internal Affairs
- A copy of the Class 4 Game Rules
- A copy of the Foundation's Harm Minimisation Policies
- Problem Gambling Exclusion Orders (Self-initiated and Venue initiated)
- Instructions on the Multi Venue Exclusion processes
- A copy of the Venue Specific Harm Minimisation Initiatives
- Extracts from the Gambling Act 2003 and any updated associated Regulations as they pertain to the venue operator
- Regularly Updated Harm Minimisation Training Register
- Sweep Record and Incident Register Booklets
- A list of all Service Provider contact details
- Section 82 Signage (Information about class 4 gambling conducted at the venue)
- Harm Minimisation signage and brochures (Identifying problem gamblers)
- Game Rule 9 signage (Syndicated Play and Only One Gaming Machine per Player)
- Under 18 Age Restriction signage
- Grant Application signage
- Jackpot Information signage
- Problem Gambling Service Providers contact details
- Harm Minimisation Brochures

Appendix 2

THE TRUSTS COMMUNITY FOUNDATION

As a licensed Class 4 Gambling operator here in New Zealand, this Foundation is committed to meeting its regulatory and statutory obligations at all times.

Should you have a grievance with any aspect of our operation then details of how and where to lodge a Complaint is detailed below:

If the complaint relates to our Grant Application process, it must be in writing:

The Trusts Community Foundation
Private Bag 93108
Henderson
Auckland 0605

If the complaint relates to the conduct of Class 4 Gambling at this venue or the Foundation itself:

The Department of Internal Affairs (Gambling Compliance)
PO Box 805
Wellington 6140
Tel: (04) 495-7200 or 0800 257 887

For General Enquires: Phone 0800 882 3583, Option 1

The Gambling Act 2003 prohibits venue operators, management, and personnel from being involved in the grant application process. This includes the decisions about, or in managing the application or distribution of the net proceeds from Class 4 Gambling.



Appendix 3

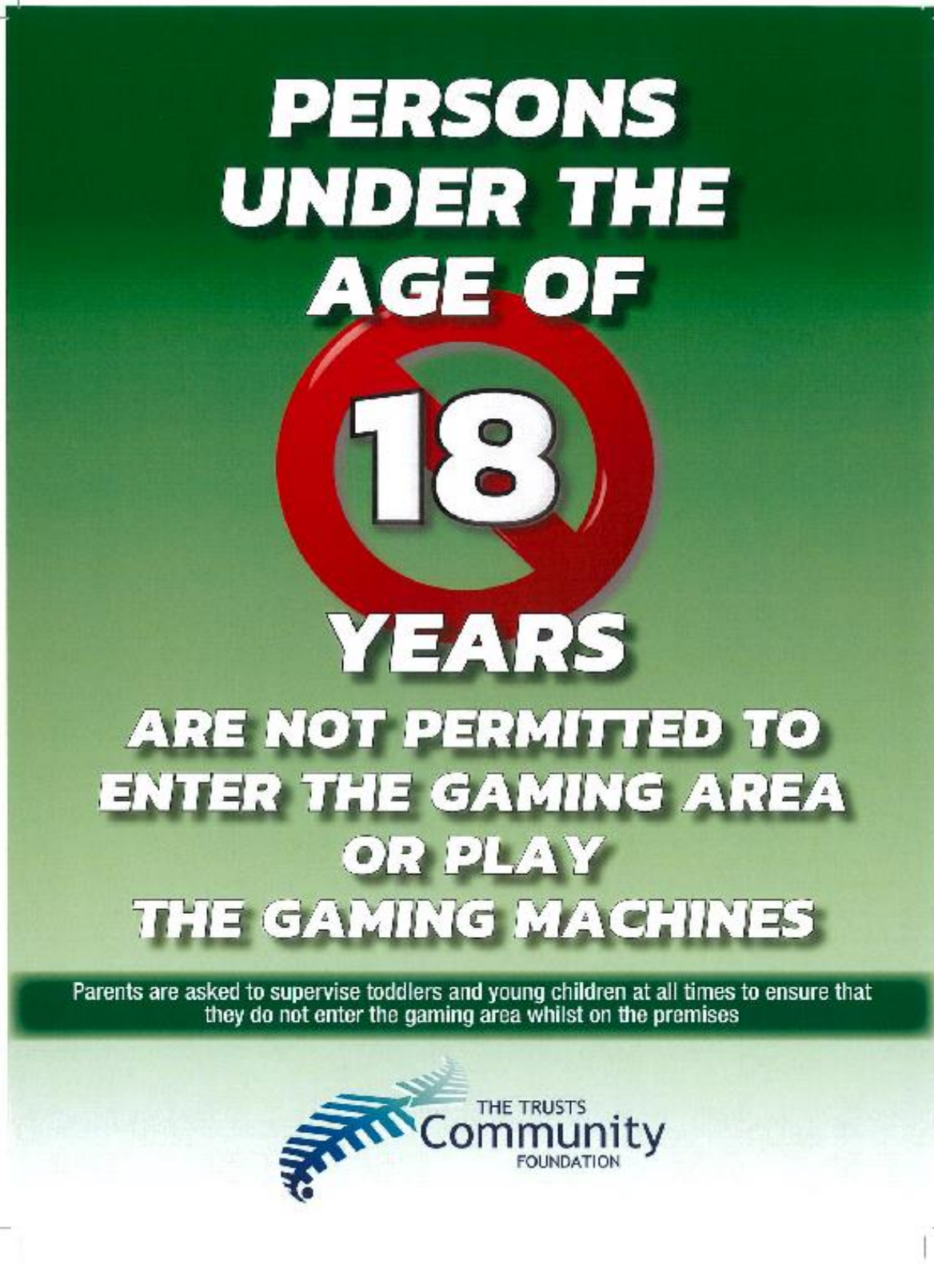
NO PERSON SHALL PLAY MORE THAN ONE GAMING MACHINE AT A TIME & SYNDICATED PLAY IS STRICTLY PROHIBITED

There is a linked Jackpot system operating in this gaming area.

No person shall engage in syndicated play with any other player or players and/or solicit or induce any player to take part in such an arrangement. Similarly they must not induce or intimidate a player to vacate the machine they are playing.

Any person or persons found to be acting in breach of these requirements will be asked to leave the gaming area immediately, noting that they will also forfeit their rights to claim any wins and/or prizes owing to them.





Appendix 5



GRANT APPLICATIONS

TTCF operates an online application module on our website and welcomes applications for funding from any eligible local community based organisation.

It is strongly recommended that all applicants familiarise themselves with our current funding criteria **BEFORE** signing in to the online application module.

It's all there on the homepage of our website
www.ttcfltd.org.nz

Should you require assistance at any stage of the process please contact our Grants Office by

Telephone: 0800 882 3583, Option 2

OR

Email: grants@ttcfltd.org.nz



Appendix 6



**Safer
Gambling
Aotearoa**
Me kōrero tātou

**Please don't be offended if
we ask about your gambling.
It's part of our staff's job.**

This venue has a policy for identifying and minimising
gambling harm to players, which is available on request.

© Crown of New Zealand

 **Te Tari Taiwhenua**
Internal Affairs

Te Whatu Ora
Health New Zealand

Appendix 7

Harm Minimisation Gaming Room Sweep Report

	8.00 am - 9.00 am	9.00 am - 10.00 am	10.00 am - 11.00 am	11.00 am - 12.00 pm	12.00 pm - 1.00 pm	1.00 pm - 2.00 pm													
Time	Sweep 1	Sweep 2	Sweep 3	Sweep 4	Sweep 5	Sweep 6	Sweep 7	Sweep 8	Sweep 9	Sweep 10	Sweep 11	Sweep 12	Sweep 13	Sweep 14	Sweep 15	Sweep 16	Sweep 17	Sweep 18	
# Machines in use																			
TIME IN VENUE																			
ATM Incidents																			
Staff Initials																			
	2.00 pm - 3.00 pm	3.00 pm - 4.00 pm	4.00 pm - 5.00 pm	5.00 pm - 6.00 pm	6.00 pm - 7.00 pm	7.00 pm - 8.00 pm													
Time	Sweep 19	Sweep 20	Sweep 21	Sweep 22	Sweep 23	Sweep 24	Sweep 25	Sweep 26	Sweep 27	Sweep 28	Sweep 29	Sweep 30	Sweep 31	Sweep 32	Sweep 33	Sweep 34	Sweep 35	Sweep 36	
# Machines in use																			
TIME IN VENUE																			
ATM Incidents																			
Staff Initials																			
	8.00 pm - 9.00 pm	9.00 pm - 10.00 pm	10.00 pm - 11.00pm	11.00 pm - 12.00am	12.00 am - 1.00 am	1.00 am - 2.00 am													
Time	Sweep 37	Sweep 38	Sweep 39	Sweep 40	Sweep 41	Sweep 42	Sweep 43	Sweep 44	Sweep 45	Sweep 46	Sweep 47	Sweep 48	Sweep 49	Sweep 50	Sweep 51	Sweep 52	Sweep 53	Sweep 54	Sweep 55
# Machines in use																			
TIME IN VENUE																			
ATM Incidents																			
Staff Initials																			
ATM Incidents:																			

Approaches made during shift:

Reviewed by:

Venue Manager sign off:

Appendix 8

Definition of Harm:

Harm or distress of any kind 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.

The 7 main signs of harm:

- Withdrawing or attempting to withdraw cash from an ATM or EFTPOS device on two or more occasions in one day to use for gambling at the venue.
- Gambling during 9 or more consecutive gambling area sweeps
- Attempting to borrow money from 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 with 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)

A problem gambler is anyone “whose gambling causes harm or may cause harm.”

In this way, ‘problem gambling’ does not necessarily mean ‘pathological gambling’ in a clinical sense. To make this clear, throughout these policies the term ‘harmful gambling’ has been used instead of the term ‘problem gambling’.

Effects of Problem or ‘Harmful’ Gambling

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 a couple of hours in front of a gaming machine, for another that might take them away from caring for their children or other important responsibilities.

The financial and emotional stress arising from harmful gambling is likely to be affecting a person's household, their wider family and friends' network, and even their workplace.

Problems are likely to range from the person concerned having arguments with family members over the amount of money being spent on gambling, through to them facing major financial and/or interpersonal difficulties arising from a compulsive addiction to gambling.

Appendix 9

HARM MINIMISATION INCIDENT & INTERVENTION RECORD

Staff Name: **Date:**/...../..... **Time:**

Name/Description:

General Signs	Tick	Action Taken	Tick
Length of Play		Asked if the player was OK	
Gambles for long periods (9 gaming room sweeps) without a break	<input type="checkbox"/>	Questioned whether it was a good idea to continue playing	<input type="checkbox"/>
Gambles most days	<input type="checkbox"/>	Suggested the player take a break	<input type="checkbox"/>
Finds it difficult to stop at closing time	<input type="checkbox"/>	Suggested the player leave the venue for the day	<input type="checkbox"/>
Social Behaviour		Asked the player about their gambling	
Becomes angry at or stands over other players	<input type="checkbox"/>	Made a note to continue to monitor the player	<input type="checkbox"/>
Is rude to other players or staff	<input type="checkbox"/>	Provide the Player with an HPA Brochure	<input type="checkbox"/>
Complaints to staff about losing	<input type="checkbox"/>	Explained the self-exclusion procedure	<input type="checkbox"/>
Money		Issued exclusion order	
Puts large wins straight back into machine	<input type="checkbox"/>	Offer a Multi Venue Exclusion order	<input type="checkbox"/>
Tries to withdraw money two or more times from Eftpos	<input type="checkbox"/>	Speak to other staff about your concerns	<input type="checkbox"/>
Uses venue ATM for the second time	<input type="checkbox"/>		
Leaves venue to find more money to gamble	<input type="checkbox"/>		
Behaviour during play			
Tries to play two or more machines	<input type="checkbox"/>		
Plays intensely without reacting to what is going on around them	<input type="checkbox"/>		
Plays very fast (high spend per line)	<input type="checkbox"/>		
Shows frustration (grunting/groaning, playing roughly)	<input type="checkbox"/>		
Shows some signs of distress (looks depressed, sweating, nervous/edgy)	<input type="checkbox"/>		
Has gambling rituals or superstitions (rubbing, talking to machine)	<input type="checkbox"/>		

Strong Signs	Tick	Other comments:
Gambler tells staff that gambling is causing them problems	<input type="checkbox"/>
Shows obvious signs of distress (crying, holding head in hands, shaking)	<input type="checkbox"/>
Has an angry outburst towards staff, customer or machine (shouting/swearing, kicking/hitting machine)	<input type="checkbox"/>
Appearance or personal hygiene deteriorates significantly	<input type="checkbox"/>
Tries to borrow money from customers or staff	<input type="checkbox"/>
Leaves children in their car while they gamble	<input type="checkbox"/>
Friends or family raise concerns about gambler	<input type="checkbox"/>
Goes out of their way to avoid being seen at venue (including asking staff to not let others know they are there)	<input type="checkbox"/>
		Signed:
		Reviewed by: (Venue manager)

Appendix 10



Venue Specific Initiatives

Name of Venue:	Date:
Staff Training:	
<ul style="list-style-type: none"> Name of person/s specifically assigned with the responsibility of ensuring all staff are familiar with the Foundation's set of Harm Minimisation policies 	
Comments:	
<ul style="list-style-type: none"> Provide details on how this is actioned 	
Comments:	
<ul style="list-style-type: none"> Confirm that the venue's induction programme includes a session regarding harm minimisation, dealing with exclusion orders and preventing access to minors 	
Comments:	
Monitoring Gaming Area:	
<ul style="list-style-type: none"> Detail how often staff inspect the gaming area and list who is responsible for ensuring this happens 	
Comments:	
Identifying Problem Gamblers:	
<ul style="list-style-type: none"> Describe how the patrons in or around the gaming area are monitored for signs of problem gambling 	
Comments:	

<ul style="list-style-type: none"> List the names of staff members who are responsible for making the ultimate decision regarding banning a patron from the venue
<p>Comments:</p>
<ul style="list-style-type: none"> List the names of staff members who are designated specifically to deal with patrons that request to be self-banned
<p>Comments:</p>
<p>Identification of Minors:</p>
<ul style="list-style-type: none"> Confirm that all staff are aware that gaming patrons must be 18 years of age or older and that they know what an acceptable form of ID is i.e., NZ Drivers Licence, Passport, Student ID (with photo), NZ Firearms Licence or Pub Card
<p>Comments:</p>
<ul style="list-style-type: none"> Detail how public access into the gaming area is monitored on an ongoing basis and specifically what processes are in place to deal with those patrons suspected of being underage
<p>Comments:</p>
<ul style="list-style-type: none"> Confirm that staff are aware of the Foundation’s “all-inclusive policy” i.e. babies and toddlers are considered to be minors and are prohibited from the gaming area
<p>Comments:</p>
<p>Host Responsibility:</p>
<ul style="list-style-type: none"> Detail what policies have been established to ensure that Gaming Machines are not operated outside of the hours the primary activity at the venue is also being offered

Comments:	
<ul style="list-style-type: none"> Detail what policies have been established to ensure that credit is not able to be offered for gambling purposes 	
Comments:	
<ul style="list-style-type: none"> Detail what steps are taken to ensure a player does not play more than one Gaming Machine at a time 	
Comments:	
<ul style="list-style-type: none"> Detail what checks are conducted to ensure that the following requirements are met: <ul style="list-style-type: none"> a) All required signage is on display b) Adequate stocks of problem gambling pamphlets are available c) Information on how to apply for Grant funding is displayed 	
Comments:	
<ul style="list-style-type: none"> Over and above completing a “player dispute/machine malfunction report”, detail what systems and procedures are in place to deal with situations that require independent investigation and/or expert opinion. 	
Comments:	
<ul style="list-style-type: none"> Detail the policies in place to ensure staff do not gamble while on duty 	
Comments:	
<ul style="list-style-type: none"> Detail any other initiatives the venue has in place in relation to any of the headings listed above 	
Comments:	
Signed:	
Venue Manager:	Date:
Venue Operator:	Date:

Appendix 11

Clause 16 (Gambling (Harm Prevention and Minimisation) Regulations 2004 (2023 version)

Records relating to gambling area sweeps and signs of harm

(1) The venue manager must maintain records for the purposes of recording the information required by subclauses (2) to (6).

(2) The venue manager must ensure that venue personnel record the following information in relation to a gambling area sweep:

- (a) identification of the venue personnel who conducted the gambling area sweep;
- (b) the date and time that the venue personnel conducted the gambling area sweep;
- (c) how many players were present in the gambling area during the gambling area sweep;
- (d) evidence of the steps taken by the venue personnel to monitor and identify whether players have been gambling during consecutive gambling area sweeps;
- (e) if a gambling area sweep is not conducted because venue personnel could verify through other means that the gambling area was unoccupied by players;
 - (i) the method by which venue personnel verified that the gambling area was unoccupied by players; and
 - (ii) the date and time that the gambling area sweep was not conducted.

(3) The venue manager must ensure that venue personnel record the following information in relation to each sign of harm identified:

- (a) the name of the venue personnel who identified the sign of harm;
- (b) the date and time that the venue personnel identified the sign of harm;
- (c) 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);
- (d) which sign of harm was identified;
- (e) the name of the venue personnel who talked to the player as required by [regulation 15\(2\)](#);
- (f) the date and time that the venue personnel talked to the player;
- (g) a summary of the conversation with the player;
- (h) any further action taken in respect of the player.

(4) 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:

- (a) assess whether venue personnel have taken appropriate action following the identification of 1 or more signs of harm in a player; and
- (b) assess whether further action is required in respect of a player; and
- (c) determine whether there are any players who the venue manager, or the person acting on their behalf, has reasonable grounds to believe are problem gamblers.

(5) The venue manager, or the person acting on their behalf, after reviewing the records in accordance with subclause (4), must record:

(a) the date of the review; and

(b) any further action taken as a result of the review.

(6) The venue operator must ensure that information recorded is retained for a period of 3 years after the date on which it was recorded.

Regulation 16: inserted, on 1 December 2023, by [regulation 11](#) of the Gambling (Harm Prevention and Minimisation) Amendment Regulations 2023 (SL 2023/82).