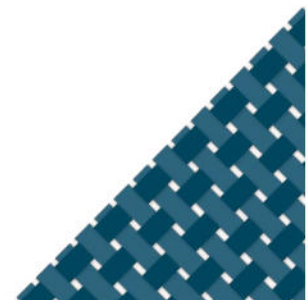


# SkyCity Auckland

# Audit Report

**Exclusion process Audit 2025**



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## 1. Purpose of the audit

The purpose of this audit is to ensure that SkyCity Auckland is meeting its Host Responsibility Programme (HRP) and Gambling Act 2003 (Act) requirements for:

- Dealing with player self-exclusion and casino-initiated exclusion orders, by following Standard Operating Procedures (SOP) which align with the Act.
- Removing players in a sufficient timeframe who commit a breach of exclusion (BOE).
- Implementing robust post-exclusion re-entry conditions, and ensuring they are adhered to in-line with their Problem Gambler Identification Policy and the purposes of the Act.
- Ensuring training provided to staff involved in the exclusion process is in line with the requirements of the HRP.

These audits will also help determine whether SkyCity Auckland is meeting their exclusion record keeping and reporting obligations required under the Minimum Operating Standards for Casinos (MOS).

## 2. Executive summary

SkyCity Auckland has policies and procedures in place to ensure that exclusion orders are issued promptly to customers requesting to exclude themselves from the casino and to persons that casino staff have reasonable grounds to believe are problem gamblers but refuse to take self-exclusion when offered. Evidence from interviews with SkyCity staff and an analysis of a sample of the exclusion records from the audit period indicated these practises are largely followed by staff consistently. It was noted that there are instances in both the paperwork issued to customers and in some of the guidance documents for staff that could be misleading in relation to the status of an exclusion under the Gambling Act 2003 particularly around re-entry conditions. Opportunities to remind staff about best practise in some areas in recording practices were also identified.

SkyCity Auckland predominately uses facial recognition technology to identify patrons breaching or attempting to breach an exclusion order. Staff have been advised it is a priority to approach and remove an excluded gambler from the gambling floor and to do so as quickly as possible. An analysis of a sample size of breach records during the audit period indicates this is done quickly in practise.

SkyCity Auckland has a documented process for assessing re-entry applications after a period of exclusion and for monitoring customers approved for re-entry. Third-party concerns are taken seriously throughout this process. An analysis of a sample of the records indicates staff are generally adhering to these processes though it was identified that not all GOI files are kept open and monitored for a full six months from the approval date.

Training provided to SkyCity Auckland staff involved in the exclusion process is consistent with the requirements outlined in the HRP.

The audit findings are summarised below:

| Area                  | DIA finding/conclusion |
|-----------------------|------------------------|
| Exclusions            | Satisfied              |
| Breaches of Exclusion | Satisfied              |
| Re-Entry              | Satisfied              |
| Training              | Satisfied              |

### 3. Background

SkyCity Auckland casino was licenced under section 37 of the Casino Control Act 1990 on 7 May 1998. The holder of the Operator’s licence was Sky City Casino Management limited.

The casino’s venue (premise) licence was held by Sky Tower Casino Limited.

The current Chief Executive Officer of SkyCity Entertainment Group is Jason Walbridge.

The last audit conducted at SkyCity Auckland was a cashiering procedures and handling of money audit in 2022 which found SkyCity Auckland compliant in all areas assessed.

### 4. Scope

An audit period of one year, 1 January 2024 to 31 December 2024, was selected for consideration.

Matters considered in scope for the audit were:

- Standard Operating procedures and policies that SkyCity Auckland has in place in relation to exclusion orders, breaches of exclusions and re-entry requirements.
- Targeted training and training records for staff involved in relation to exclusion orders, breaches of exclusions and re-entry requirements.

- Any records relating to instances of exclusion, breaches of exclusions and re-entry considered during the audit period.

Matters considered out of scope were:

- Host Responsibility requirements not related to the audit topic.
- Data outside of the prescribed audit timeframe outlined above.

## 5. Methodology

On 6 March 2025 an engagement letter was sent to SkyCity Auckland advising the purpose and scope of the audit. A request for the number of exclusions, breaches of exclusions and patrons assessed for re-entry during the audit period broken down by month was also included in this letter. Once received the audit lead decided on a representative sample of this information for analysis.

Documentation was then requested from SkyCity Auckland for analysis for the audit period. The initial document request was issued on 21 March 2025 to SkyCity Auckland for the following:

### **The issuing of exclusions:**

- Any policies, procedures or guides SkyCity Auckland has for issuing self-exclusion orders, casino-initiated exclusions or multi venue exclusions.
- All documents relating to the first 30 exclusion orders issued by SkyCity Auckland for July 2024 (Please include any I-track records and associated paperwork).

### **Breaches of Exclusion orders:**

- Any policies, procedures or guides SkyCity Auckland has for breaches of exclusion orders.
- All documents relating to the first 20 breaches of exclusion at SkyCity Auckland from July 2024.

### **The re-entry process for previously excluded patrons.**

- Any policies, procedures or guides SkyCity Auckland has for the re-entry process.
- All documents relating to the first 10 approved re-entries and the first 10 declined re-entries from April 2024. Please provide all documentation related to the 10 approved re-entry patrons in April 2024, including their Gambler of Interest files for the full review period (minimum of 6 months).

### **Training materials related to the exclusion process.**

- Copies of training material for staff specifically relating to issuing exclusions, handling breach of exclusions and the re-entry of previously excluded patrons.
- A list of staff trained in issuing exclusion orders, managing breaches of exclusions and the re-entry of previously excluded patrons.
- The dates these staff last received training or refresher training in issuing exclusions, managing breaches of exclusions and the re-entry of previously excluded patrons.

The documentation was analyzed, and interview questions were drafted from this information.

An onsite visit was conducted at the SkyCity Auckland premises at 99 Albert Street from 12-14 May 2025 to conduct interviews with the following SkyCity staff members:

- ██████████ Host Responsibility Executive.
- ██████████ Security Officer.
- ██████████ Security Team Manager.
- ██████████ Host Responsibility Manager.
- ██████████ Host Responsibility Team Leader.

Angela Stephens, Group General Manager for Host Responsibility, was present for the Host Responsibility interviews and ██████████ Legal Counsel for SkyCity, was present for the security interviews.

These interviews were recorded on audio, except for the one with ██████████ who declined to be recorded, and were later transcribed.

Additional questions in relation to specific records were sent to SkyCity Auckland on 20 May 2025 and a response was received on 4 June 2025.

## **6. Strong areas**

- SkyCity Auckland promptly informed the Department of Internal Affairs of all the breaches of exclusion in the sample reviewed. Notification occurred on the same day of the breach on all occasions.
- SkyCity staff promptly approach excluded gamblers and remove them from the gaming floor once they are identified. The average time from identification of the excluded gambler to an approach by a SkyCity staff member was 6.32 minutes in the records reviewed.
- SkyCity Auckland staff treat third-party concerns seriously, in all re-entry applications where third-parties raised concerns around the applicant's gambling the application was declined.

## **7. Weak areas**

- SkyCity staff are not consistently completing all applicable checklist items in I-track entries for exclusions issued as required by the exclusion SOP.

- Some of the wording in the exclusion orders and explanation of exclusion orders issued by SkyCity Auckland is misleading; advising customers that they will commit an offence under Section 312 of the Gambling Act if they enter the gaming areas of SkyCity after the exclusion has expired but before the patron has completed the SkyCity imposed re-entry process.

# 8. Audit Findings

## Exclusions

|   |           |
|---|-----------|
| Gambling Act (2003) – Section <u>309</u> , <u>309a</u> and <u>310</u> | Satisfied |
|---|-----------|

### Criteria

- Examination of SkyCity Auckland’s SOP’s in relation to issuing exclusion orders.
- Review of a randomly selected sample of exclusion records issued by SkyCity Auckland during the audit period.
- Analysis of data provided during the audit timeframe to identify trends and verify compliance with the Host Responsibility SOP’s.
- Conduct interviews with relevant staff members to gather insights and verify their understanding and implementation of the SOP’s.

### Finding

The Department is satisfied that SkyCity Auckland has implemented standard operating procedures for issuing exclusion orders which is consistent with the requirements of the Gambling Act 2003 and those processes are followed by staff in practise.

SkyCity Auckland has an ‘*Exclusion*’ Standard Operating Procedure (SOP) that specifically addresses how staff should issue a Self-Exclusion (section 2.0) and a SkyCity/Third Party Exclusion (section 3.0). This policy addresses the requirements in sections 309, 309A and 310 of the Act to:

- promptly issue an exclusion order to a customer who requests one.
- to approach a customer who the casino has reasonable grounds to believe is a problem gambler and offer information and advice to that person about problem gambling that includes the self-exclusion procedure.
- to issue an exclusion order if that person declines self-exclusion and their ongoing behaviour or gambling gives the casino reasonable grounds to believe that person is a problem gambler.

For the audit period a total of 811 exclusion orders were issued at SkyCity Auckland. A sample of 30 exclusions was selected by the audit lead for analysis to check how exclusions were issued in practise.

The analysis found that SkyCity staff generally followed the SOP correctly. However, the following was noted:

- Of the 23 self-exclusion records 10 did not include a field in the checklist to advise if MVE was accepted or declined by the customer. Interviews with SkyCity staff indicated it was likely that the MVE question was asked but the answer was missed being recorded in the checklist. When questioned if SkyCity Auckland had any information to confirm MVE was issued to patrons in these 10 specific cases SkyCity Auckland advised there is no way to confirm it was offered but considered it was likely it was offered and missed on the checklist.
- Eight of the 30 exclusion records did not specifically mention that the customer's account had been deactivated. When raised with SkyCity Auckland it was confirmed that the accounts in these cases were all deactivated at the time of the exclusion.
- In two records (IN20240034425 and IN20240035234) where the customer was given a deadline by which they must take a self-exclusion order or they would be SkyCity excluded, the SkyCity exclusion orders were issued 26 days and five days after the deadline had passed. When queried about these two incidents SkyCity Auckland advised; *'Typically, we try to keep continuity across who the player deals with when possible, so they're not dealing with multiple different staff. Ideally, if the player is a GOI and needs to be offered Self-Exclusion, this will be done by their GOI case-manager, who will then also be the one to issue an Exclusion Order (if required). So, there may be a few days delay between the deadline date and when the Exclusion is actually issued (e.g. if the case-manager is on days-off / leave). During this time the player is stood down/not permitted to enter any gaming areas. In ██████████ case, the delay was due to the GOI case-manager being on extended leave at the time.'*
- In one record (IN20240036290) the customer had marked the box allowing SkyCity to contact a counsellor on their behalf with an 'X' but had not provided a preferred time of day for contact or selected a preferred provider. There was no mention of follow-up action in the I-track entry by the SkyCity staff to check if this was done in error or if the customer did want a counsellor to contact them. When queried SkyCity Auckland advised; *'I checked with the Exec' who processed this. They advised that ██████████ hadn't selected a time-period on the Exclusion application form, so they had to call him to follow-up on this (you can see on the form that the rest was typed-out, but the time-period is selected by hand). Their recollection is that they would have asked / confirmed re: the counselling during that call (hence why they noted 'no counsellor nominated' in the IR).'*
- For two self-exclusion records (IN20240034481 and IN20240035076) The circle around the period of the length of the exclusion was partially around two numbers. While for another (IN20240035062) no exclusion period was circled at all on the exclusion record. In all three instances there were other documents in the paperwork provided to the patrons which had the correct period recorded on them.

When reviewing the SOP, it was noted that Host Responsibility always email the exclusion details to the non-SkyCity casinos in New Zealand (Grand Casino in Dunedin and Christchurch Casino). This process was confirmed in the interviews with Host Responsibility staff. However, the SOP and Host Responsibility staff both confirmed that customers are advised their exclusion information may be shared with these other casinos rather than advising them it will be shared.

When reviewing the 'Self-Exclusion' Checklist document it was noted that one of the items it advises to inform the customer is; *'Exclusion applies to all gaming areas of SkyCity operated Casinos in New Zealand for the duration requested, including SkyCity Adelaide gaming areas'*. This could be considered misleading as the exclusion does not apply to SkyCity Adelaide. SkyCity Adelaide has access to the exclusion information from the New Zealand SkyCity casinos in I-track and will offer the customer self-exclusion if they attempt to enter SkyCity Adelaide before re-entry has been completed in New Zealand. If the customer refuses, they will be issued a warning. Interviews with SkyCity staff confirmed they did not advise that customers are excluded from SkyCity Adelaide while the SkyCity Auckland exclusion was in effect, and referred to the correct process when questioned. In addition, none of the other paperwork refers to the exclusion applying to SkyCity Adelaide.

Additionally when reviewing the exclusion paperwork templates the following was noted:

- On the self-exclusion order there is an instance where exclusion is misspelt as *'exculusion'*.
- There is a section on the self-exclusion order which states that *'If you re-enter the gambling areas of SkyCity operated premises within 3, 6, 9, 12, 24 months from the date of this notice and before you meet the re-entry conditions, you will commit an offence under section 312 of the Gambling Act 2003'*. While the explanation of exclusion order document supplied to customers states *'If you re-enter any of the above areas of SkyCity operated casinos within this period or before you complete the re-entry process, then you will commit an offence under S312 of the Gambling Act 2003.'* The SkyCity exclusion order and explanation of exclusion order contains similar wording. This can be considered misleading as section 312(1)(b) of the Gambling Act (The Act) refers to a breach of a condition of re-entry imposed under sections 309(4) or 310(2) of the Act. These sections in turn refer to Section 316(1)(e) which states that *'The Governor-General may, by Order in Council, make regulations- prescribing 1 or more procedures that must be completed by a problem gambler as a condition of re-entry to the gambling area of a class 4 venue or casino venue'* No such procedures have been passed under section 316(1)(e) and all the re-entry conditions otherwise referred to in the exclusion process and documentation are specific SkyCity ones. The customer would therefore not be breaching section 312 of the Act if they were to enter the gaming area of a SkyCity casino when their exclusion order had expired, and they had not met SkyCity imposed re-entry conditions.
- There is also wording on the 'Self-Identified Exclusion Application' form which can be considered misleading; *'I understand that this request means that I agree to an Exclusion Order being issued against me, under the provisions of section 310 of the Gambling Act 2003, and that the order will remain in force for the period specified above and until re-entry has been approved by SkyCity'*. While a patron may return to SkyCity only after being approved re-entry the exclusion order itself does not remain in force after it has expired.

## Conclusion

The Department is satisfied that SkyCity Auckland has implemented standard operating procedures for issuing exclusion orders which is consistent with the requirements of the Gambling Act 2003. Interviews with staff and a review of exclusion records found that staff are generally adhering to this policy when issuing exclusions.

It was noted that there are instances in both the paperwork issued to customers and in some of the guidance documents for staff that could be misleading in relation to the status of an exclusion under the Gambling Act 2003 particularly around re-entry conditions. It is noted that there is no legislative requirement to offer a customer MVE and while not recorded on the checklist SkyCity Auckland were able to confirm that customers loyalty accounts were deactivated in each instance. Opportunities to remind staff about best practise in some areas in recording practices were also identified.

## Breach of Exclusion

|   |           |
|---|-----------|
| Gambling Act (2003) – Section <u>311</u> and <u>312a</u><br><u>Minimum Operating Standards - (MOS) 14</u> | Satisfied |
|---|-----------|

### Criteria

- Examination of SkyCity Auckland SOP's in relation to breaches of exclusion.
- Review of a randomly selected sample of breach of exclusion records issued by SkyCity Auckland during the audit period.
- Analysis of data provided during the audit timeframe to identify trends and verify compliance with the Host Responsibility SOP's.
- Conduct interviews with relevant staff members to gather insights and verify their understanding and implementation of the SOP's.

### Finding

The Department is satisfied that SkyCity Auckland has policies and procedures in place for managing breaches of exclusion orders that are consistent with the requirements of the Act and followed by staff in practise.

SkyCity Auckland has an 'Exclusion' Standard Operating Procedure (SOP) that specifically addresses how staff should manage breaches of exclusion orders (section 5.0). This policy addresses the requirements in the Act to remove a person who enters the casino in breach of an exclusion order and to keep records of persons excluded from the casino as required by the Act and the MOS.

SkyCity Auckland mainly monitor for patrons breaching an exclusion order through the Guardian facial recognition system. Security staff still familiarise themselves with photos of excluded or trespassed customers and an excluded patron could also potentially be identified if they attempted to use their premier card as they would be marked as banned in CMP.

Security staff at the casino entrances are informed by control if there is a match in facial recognition for an excluded patron and prioritise stopping them before they reach the gambling floor, so a breach of exclusion does not occur. Security is confident of being able to do so at the main Casino entrance and the Baccarat entry but advise [REDACTED]

When a customer is identified as having breached their exclusion order they are approached by a Security Officer who will attempt to verify their identity by asking for ID and then escort them to one of the interview rooms. It is a priority for security to approach a customer who is breaching an exclusion order, and a Security Manager will make the approach if none of the Security Officers are available.

For the audit period a total of 94 breaches of exclusion orders were recorded at SkyCity Auckland. A sample of 20 breaches was selected by the audit lead for analysis to check how breaches of exclusion orders were managed in practise.

The analysis found SkyCity staff generally followed the SOP's in practise. The following was noted from the analysis:

- An email was sent to DIA informing us of the breach the same day it occurred on all occasions.
- For 19 of the 20 records the time between the patron being identified as breaching and being approached by a SkyCity staff member could be established. The average time from identification to approach was 6.32 minutes. The longest approach time was 18 minutes.
- In two incidents (IN20240034230 and IN20240038016) the patrons exclusion order was expired at the time of the 'breach', but SkyCity staff still issued breach of exclusion notices and notified these incidents to DIA as breaches.

When reviewing the standard operating procedures, it was noted at two points 5.2 and 5.3 the policy advises staff to notify DIA of the breach of exclusion via telephone. DIA has not had a phone number available for notifications from SkyCity for some time. Staff interviewed were aware that DIA should be notified by email and none of the staff referred to notification via telephone. Under the MOS breaches of exclusion orders are specified as items the casino needs to notify DIA of as soon as practicable, this means that first notification can be but does not have to be by telephone and any other method agreed with DIA is acceptable.

**Conclusion**

SkyCity Auckland predominately uses facial recognition technology to identify patrons breaching or attempting to breach an exclusion order. Staff have been advised it is a priority to approach an excluded gambler and remove them from the gambling floor and to do so as quickly as possible. An analysis of a sample size of breach records during the audit period indicates this is done quickly in practise.

**Re-Entry**



**Criteria**

- Examination of SkyCity Auckland SOP’s and staff guidelines in relation assessing re-entry applications and monitoring customers who have been approved.
- Review of a randomly selected sample of re-entry applications and Gambler of Interest (GOI) files after a customer has been approved.
- Analysis of data provided during the audit timeframe to identify trends and verify compliance with the Host Responsibility SOP’s.
- Conduct interviews with relevant staff members to gather insights and verify their understanding and implementation of the SOP’s.

**Finding**

The Department is satisfied that SkyCity Auckland has a documented process for assessing re-entry applications after a period of exclusion and for monitoring customers approved for re-entry which is followed by staff in practise.

The ‘*Exclusion*’ Standard Operating procedure at SkyCity Auckland has a section (7.0) which relates to the Re-entry process. This section notes that all customers approved for re-entry after a period of exclusion must be monitored for a minimum of six months after the approval date. It also directs the reader to the ‘*Analysis and Intervention*’ Standard Operating procedure which covers Gambler of Interest (GOI) files, including those opened because of re-entry, in the ‘*Feedback and Review*’ section. SkyCity Auckland also has a best practise guide for Re-entry applications and Re-entry GOI monitoring.

Applications for re-entry must be made in writing on the prescribed application form. The form is available on SkyCity’s website or can be requested in person, over the phone or via email.

Re-entry applications are assessed by Host Responsibility executives or a Host Responsibility Team Leader. Once received Host Responsibility staff will check the customer’s eligibility.

If the customer is eligible the application is submitted for further assessment, if not the customer is advised in writing that their application has been declined.

Eligible applications are assigned to a case manager by a Host Responsibility Team Leader or Host Responsibility Manager on a weekly basis.

The case manager assesses the application against the information SkyCity holds in relation to the customer including the reasons for their exclusion, any history of breaches of exclusion and their financial position. The case manager also decides if any further information is needed from the customer.

If there were any third-party concerns that lead to the exclusion or a mentor was nominated and had not been subsequently removed the case manager will contact them to assess if they have any current concerns about the applicant's gambling.

In any instances where there was evidence of harm leading to the initial exclusion or any other matters of concern on the file a re-entry meeting will be held with the customer by the case manager. A re-entry meeting is mandatory in cases of SkyCity initiated exclusions. These meetings can be in person or over the phone.

During the meeting a safe-gambling plan will also be discussed. The safe-gambling plan sets limits on the visitation or spend (calculated as player loss) for the customer during the monitoring period and is monitored in monthly reviews. Self-Gambling plans are mandatory in cases where the customer was SkyCity excluded or there is a history of self-control or financial issues. Customers who did not meet the criteria for a mandatory safe gambling plan would still be given the option to set a voluntary safe gambling plan. The customer will put forward a plan and the case manager will assess it in relation to whether it is reasonable and sustainable regarding what is known about the customer's financial situation.

Once the case manager has completed their assessment the case is submitted to a Host Responsibility Team Leader or Host Responsibility Manager for peer review.

If the application is approved the customer is informed of this in writing and the conditions of the approval are explained including the requirement to play carded at all times.

A GOI file is opened and assigned to the approving case manager for monitoring. The GOI file must remain open for a minimum of six months.

During the monitoring period monthly reviews are conducted at the beginning of each month. The case manager assesses whether the patron has adhered to their safe gambling plan and goes through any observations or interactions recorded with the patron during the month to determine if harm is likely to be occurring.

For customers who breach their safe-gambling plan there are prescribed actions based on how far over the monthly limits the plan had been exceeded.

There are also formal reviews which occur at 12 and 24 weeks after the GOI file has been opened where the players spend, and visitation are reviewed against a combined total of their limits for those months. These are done in addition to the monthly reviews and do not replace them in the months they are undertaken.

A final review is undertaken at or after 24 weeks and the case manager will send the file to a Host Responsibility Team Leader for review. If the case manager and peer reviewer are satisfied that the GOI is not a problem gambler or at risk of problem gambling the file will be closed. If there is uncertainty around whether problem gambling could be occurring the GOI file remains open for further monitoring.

For the audit period a total of 684 applications for re-entry were assessed by SkyCity Auckland (245 approved and 439 declined). A sample of 10 approved re-entry cases and 10 declined re-entry cases were selected by the audit lead for analysis to check how re-entry applications were managed in practise.

The review of the 10 approved and 10 declined re-entry cases found that SkyCity Auckland staff were adhering to the documented policies, with the exception of five records which were closed in less than 6 months. The following was noted from the review:

- Re-entry meetings were sought and held with customers in 16 of the 20 re-entry applications. Of the four where a meeting was not sought the case manager decided to decline the application on the initial information available to them.
- In eight of the applications the case manager contacted a third-party to check if they had any current concerns with the customer's gambling. In three of these cases the third-party raised concerns about the applicant's gambling and in each of these cases the application was declined.
- In nine of the applications the case manager sought additional documentation from the customer as proof of their financial situation. In two of these cases the applicant refused to provide this information. One was declined by the case manager and the other customer decided to withdraw their application. In two of the cases where the information was provided the case manager decided to decline the application as the information indicated the safe gambling plan the customers proposed were not realistic.
- Of the 10 approved re-entry applicants nine had safe gambling plans in place.
- Five of the GOI files were closed less than six full months from the date they were approved for re-entry. This appears to be the result of the discrepancy of the file being able to be closed off following a peer review once the 24-week review is completed and the fact that some months have more than four weeks in them. I note there was no indication of gambling related harm occurring in these cases and the risk of closing them off before six full months of monitoring was completed was minimal.

The records were for:

- IN20240024029 (open for 5 months and 23 days).
- IN20240022479 (open for 5 months and 28 days).
- IN20240021157 (open for 5 months and 22 days).
- IN20240023063 (open for 5 months and 19 days).
- IN20240021432 (open for 5 months and 27 days).
- Two of the GOI files were still open at the end of the specified audit period. In the first (IN20240023911) the customer was approved re-entry on 09/05/2024 but only returned to the casino in October 2024. The notes on the file specify that it will remain open until at least 10/04/2025 due to the delayed return which is consistent with SkyCity's policy. The second (20240022395) had deviated from their Safe Gambling plan on two occasions so were continuing to be monitored.

- In six of the GOIs, deviations in spend and/or visitation was identified by the case manager as part of the reviews. All of these were managed in line with the guidelines from the best practise document. I note that in one file (IN20240021457) the customer had an overall win in one of the months, but the case manager correctly identified that the customer had exceeded their spend limit on their first visit and should not have conducted a second visit that month. This was treated as a deviation from the customers safe gambling plan. I also note there were instances of low deviations, which allow for case manager discretion, (for example in IN20240018536) where the customer was contacted and given a warning.
- In two GOI files (IN20240021093 and 20240023911) there were no carded visits recorded for several months after the GOI was opened. In both cases emails/photos were sent to the operations teams to check if the customer had been sighted on the floor.
- In some GOI files the patron was approved re-entry near the end of the month (for example in IN20240021157 re-entry was approved on 23/04/2024 and 20240021457 was approved on 25/04/2024). For the first monthly review the patron was still assessed against the monthly limits of the safe gambling plan despite there only being a few days in the period reviewed.

## Conclusion

SkyCity Auckland has a documented process for assessing re-entry applications after a period of exclusion and for monitoring customers approved for re-entry. Third-party concerns are taken seriously throughout this process. An analysis of a sample of the records indicates staff are generally adhering to these processes though it was identified that not all GOI files are kept open and monitored for a full six months from the approval date.

## Training

|                 |           |
|-----------------|-----------|
| HRP section 3.9 | Satisfied |
|-----------------|-----------|

## Criteria

- Examination of SkyCity Auckland training records for staff involved in the exclusion process.
- Conduct interviews with relevant staff members to understand the training provided to them in relation to exclusion process.

## **Finding**

The Department is satisfied that training provided to SkyCity Auckland staff involved in the exclusion process is consistent with the requirements outlined in the HRP

SkyCity Auckland's HRP requires that all staff whose work involves the gaming side of SkyCity's operation to have completed the e-learning module Host Responsibility Level 1 (HR1). This module requires an annual refresher. Additionally, staff that work within gaming areas and whose roles requires interaction with customers are required to complete Advanced Host Responsibility Training. This training includes both theoretical and practical components. Staff who complete Advanced Host Responsibility are required to undergo an online recall test annually and those who fail are required to re-take Advanced Host Responsibility training.

A list of staff involved in the exclusion process and their training records was requested.

A review of training records provided for staff who issue exclusion orders, manage breaches of exclusion orders and manage the re-entry of previously excluded patrons found that all had undertaken HR1 training and the knowledge recall test in the last 12 months. Additionally, they had all completed the Advanced Host Responsibility training.

Interviews with Host Responsibility staff confirmed that while this training gives an overview of the exclusion process most of the practical training is done on the job. A new Host Responsibility Executive is paired with one of the Host Responsibility Team Leaders or a Senior Executive during their first 12 weeks in the role.

## **Conclusion**

Training provided to SkyCity Auckland staff involved in the exclusion process is consistent with the requirements outlined in the HRP.

## 9. Recommendations

| Area                  | Recommendation   |
|-----------------------|--|
| Issuing Exclusions    | That all patrons are informed that their exclusion information will be shared with the Grand Casino in Dunedin and Christchurch Casino as opposed to the current practise of advising them it may be shared with these casinos. In practise each exclusion is notified to these casinos. Advising customers this will occur will reduce the risk of them attempting to enter these casinos while excluded from SkyCity Auckland.                       |
| Issuing Exclusions    | Amend the wording in the 'Exclusion Order (Self-Identified)', the self and third party 'Explanation of Exclusion Order' and 'Exclusion Order (Third Party)' documents to remove the implication that the patron will commit an offence under section 312 of the Gambling Act 2003 if they enter the gambling premises of a SkyCity operated premises after the exclusion order has expired but before the SkyCity imposed re-entry conditions are met. |
| Issuing Exclusions    | Amend the wording in the 'Self-Identified Exclusion Application' which implies that the exclusion order remains in force after it has expired and until re-entry has been approved by SkyCity.   |
| Issuing Exclusions    | Correct the spelling error of exclusion being spelt 'exclusion' on the 'Exclusion Order (Self-Identified)' document.   |
| Issuing Exclusions    | Amend the wording in the 'Self-Exclusion Checklist' document so it does not advise that an exclusion order issued in New Zealand applies to SkyCity Adelaide.  |
| Issuing Exclusions    | Remind staff to complete all applicable checklist items when entering self-exclusion details into I-track (as per 2.6.12 of the exclusion SOP).  |
| Issuing Exclusions    | Encourage staff to double check that only the number of months selected by the patron is circled on the 'Exclusion Order (Self-Identified)' document and that this does not overlap with other months. There is a practise by some staff members to cross out the number of months not selected to make the actual selection clearer which could be encouraged.  |
| Issuing Exclusions    | If a Host Responsibility Executive gives a customer a deadline by which they must take self-exclusion or be issued with a SkyCity exclusion and the Host Responsibility Executive will be absent at the time of the deadline implement a process whereby another staff member will be able to issue the exclusion promptly when the deadline elapses.  |
| Breaches of Exclusion | Include copies of the exclusion order being breached with email notifications to the Department of Internal Affairs in all instances of breaches of active exclusion orders.   |
| Breaches of Exclusion | Remove the reference in the Exclusion standard operating procedure at points 5.2 and 5.3 which advise SkyCity staff to notify DIA about a breach of exclusion by telephone and replace it with notification by email. DIA no longer has a telephone number available for these notifications.  |

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| Re-entry | Either amend the wording at section 7.0 of the Exclusion Standard Operating procedure to advise that all customers approved for re-entry by SkyCity must be monitored for a minimum of 24 weeks from the approval date to reflect the current practise or advise staff that GOI files opened for re-entry customers must remain open and monitored for a full six months from the approval date as per the current wording in this policy. |
| Re-entry | Consider requiring six complete months to be checked against a safe gambling plan before a GOI file can be closed as current practise allows the first monthly review to encompass a few days if the customer is approved near the end of the month but is still assessed against monthly limits for spend and visitation.   |