



CHRISTCHURCH

CASINO

**HOST RESPONSIBILITY PROGRAMME
CHRISTCHURCH CASINOS LIMITED**

**Report to the Gambling Commission
For the 12 months ending
31 December 2015**

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1. Introduction

This is Christchurch Casinos Limited's (CCL) third report on the implementation of its Host Responsibility Programme (HRP) and Problem Gambler Identification Policy (PGIP), which replaced the prior Responsible Gambling Program (RGP) which had been in force since the casino first opened.

The HRP has the following objectives:

- Preventing the onset of gambling and/or alcohol related harm and minimising gambling related harm for customers and other persons potentially affected by their gambling behaviour
- Facilitating responsible gambling

Christchurch Casino aims to fulfil these objectives by:

- Providing effective employee learning and development;
- Providing a safe gambling environment;
- Providing responsible marketing and promotional initiatives;
- Promoting the responsible consumption of alcohol; and
- Engaging effectively with stakeholders.

CCL has a 'whole of business' approach to Host Responsibility and is confident that the policies and processes in place during 2015 achieved the objectives in the HRP. CCL will continue to analyse, measure and improve its processes to ensure it is an industry leader in Host Responsibility.

This report highlights key HRP related activities undertaken in the 12 months to 31 December 2015. Appendix A of the report contains the gambling related measures required by section 3 of the HRP.

2. Resources

During the period this report relates to CCL employed a dedicated Host Responsibility Executive (HRE) to oversee all aspects of the HRP and PGIP. The HRE was supported at a senior Management level by the Host Responsibility Group (HRG) which includes the HRE, Risk and Compliance Manager, Security and Surveillance Manager, Gaming Manager, Food and Beverage Manager, Security Manager, Compliance Officer and the Chief Executive. The HRG meets monthly to maintain an overview of the operation of the HRP and deal with any particular issues that have arisen in the previous month.

The HRE dealt with the day-to-day operation of the HRP, including interventions, exclusions and re-entry interviews. In the absence of the HRE the casino's Security Shift Managers are trained to deal with requests for Self-Exclusions, Casino-Exclusions and any breaches of exclusion that occur.

The HRE position, which replaced the previous Host Responsibility Manager (HRM) role was placed in the Surveillance and Security domain. This has given the position more immediate support from Surveillance staff who are the Casinos 24/7 'eyes and ears', and also allows a greater focus to be given to frontline Security and Gaming staff, empowering

them to deal directly and with greater immediacy with regard to exclusions and interventions with potential problem gamblers.

At the front-line level all CCL staff are trained in Host responsibility. All staff in all Departments are responsible for observing any signs of possible problem gambling or other issues and reporting those observations for the HRE to follow up on.

3. Key areas of activity

3.1 Data collection and analysis

CCL adopts a 'whole of business' approach to the collection of data to support the HRP. This starts at the front line with all staff trained and supported in reporting their observations either to a Supervisor or directly themselves into the Host Responsibility (HR) Log. Events that require immediate intervention, for example a customer requesting a Self-Exclusion, are escalated and dealt with immediately either by the HRE or the Security Shift Manager. The entries in the HR Log are analysed by the HRE and form a valuable part of the base information collected to assist in achieving the objectives of the HRP.

The number and variety of entries in the HR Log reflect the good level of 'buy in' by front line staff to this process. An important part of the process is that the HRE responds to each entry made detailing the actions taken. In this way staff can see that the observations are both taken seriously and that they play an important part in the success of our HRP.

The Casino's Surveillance and Security Department records their observations and interactions with customers in an internal security and surveillance database which the HRE has access to. The HR Log entries, along with loyalty data and surveillance and security observations give the HRE the best possible information to work with in assessing actual and potential problem gamblers.

This year has seen a dramatic and pleasing increase in the number of reports of observations to Host Responsibility from all areas of the business. We believe this increase is due to the revised Host Responsibility training completed during this year. All staff were also put through a department-specific Problem Gambling Awareness refresher course. Another factor we believe is behind the increased number of reports about more customers is the extension of HR Log access to all staff. The increased awareness of indicators of problem gambling and ease of reporting are areas CCL is dedicated to continuing the development of.

Responsible Service of Alcohol (RSA) training was also revised in 2015. Refresher training was revised as well and now includes a more advanced RSA section. We believe the resulting increase in RSA awareness and skills have led to the significant reduction in alcohol-related figures for 2015.

An increasingly proactive and preventative approach to Host Responsibility by staff in Host Responsibility, as well as senior staff in both our Gaming and Security departments has seen a significant increase in the number of interventions with customers. This increase

may be due to the new HRE role and the closer working-relationship between it and senior Security staff.

Data collection and recording has been a key point of focus during this year. Both slight improvements to our Security and Surveillance database, as well as staff training around observations, interactions and events requiring reports have resulted improved accuracy in this area.

3.2 PRE-COMMITMENT

CCL enabled the pre-commitment module of the new Bally Casino EMS in April 2013 to provide another tool to assist customers in controlling their own gambling. The system allows customers to voluntarily set limits on how much money they spend and/or how much time they play for on the electronic gaming machines.

The system provides notifications to both the gaming machine player and the casino when 80% of the set limits are reached and again when the limits are reached or breached. Once the limits are reached the customer can no longer earn promotional bonus points or enter into promotions.

The notifications are considered as a general indicator in terms of problem gambling. Limit reached notifications are followed up immediately by the duty Gaming Shift Manager who will observe and may intervene with the customer.

The pre-commitment system is also used as a tool to monitor and assist formerly excluded customers who are allowed to re-enter the casino. These customers must use their loyalty cards when playing and are encouraged, if gaming machine players, to set limits using the pre-commitment system, to allow their amount spent and time on site to be monitored.

Generally the pre-commitment system has been well received by the small percentage of gaming machine customers who have taken advantage of it. The initial analysis of the use of the system since April 2013 shows that for this small group of customers the pre-commitment system enables them to voluntarily control their gambling within their set limits.

3.3 STAKEHOLDER ENGAGEMENT

The HRE has regular contact with problem gambling service providers in Christchurch, both when referring CCL customers to their organisations as well as receiving reports from, the organisations when the services have been used.

As well as this on-going operational contact, the HRE convenes a regular Problem Gambling Liaison Meeting with representatives from the Problem Gambling Foundation, The Salvation Army Oasis Centre, the Department of Internal Affairs, as well as other interested parties. This meeting gives those organisations the opportunity to provide feedback and raise any areas of concern with the HRE and senior CCL management. This past year has seen the continued building of positive working relationships between these stakeholders and CCL.

The HRE also has regular contact with the Department of Internal Affairs Gambling Inspectors when on-site both to discuss operational events such as individual breaches of

exclusion, as well as part of the Department's normal audit programme for monitoring the HRP.

CCL was again represented at the National Association for Gambling Studies (NAGS, Inc.) conference in 2015, which was held in Adelaide.

CCL continues to pursue collaborative work with Auckland University of Technology's Gambling and Addictions Research Centre.

In regard to the Responsible Service of Alcohol (RSA) part of the overall HRP, the HRE is in regular contact with both the NZ Police and the District Licensing Committee. This past year has again seen the continued building of positive working relationships between these key agencies and CCL.

3.4 OTHER AREAS OF INTEREST

Hospitality NZ Awards 2015. CCL was again the winner of the "Excellence in Host Responsibility" category.

In 2015 CCL was again judged the winner of the Hospitality NZ awards in the category of "Excellence in Host Responsibility". Although the primary focus of the competition was related to the RSA and related legislation, CCL's overall approach to Host Responsibility and the 'buy in' from staff at all levels to the HRP were factors that contributed greatly to CCL's success in this award for the third year running and fourth category win overall. CCL's entry received support from both the Christchurch Police Alcohol Harm Reduction Unit and the Christchurch City Council District Licencing Committee.

Victoria Street Safe (VSS) Initiative

In 2015 CCL continued to take the concept of Host Responsibility beyond the casino's walls and was a driving force behind the Victoria Street Safe initiative, which involved restaurants and bars along Victoria Street working together to make the street a safe and pleasant environment for all street users, including residents. The 'face' of VSS are the "VSS Ambassadors", who work at moderating undesirable behaviour in and around the licensed venues. CCL contributed to the initiative this past year by offering RSA training from our HRE which included presentations from the District Licencing Committee and the Police to the staff from other venues and this offer was well-received with staff from several venues being presented to.

Multi Venue Exclusion (MVE) & Multi Casino Exclusion Processes

CCL has continued to embrace both the multi-casino exclusion process as well as the MVE process that covers all venues both casino and non-casino. This has involved some challenges, including around the quality of information (and photos) coming from the MVE requests when compared to the information and photos we collect for our own customers who exclude or are excluded. Quantity of information is also a problem with the sheer number of SkyCity exclusions notified to us compared to CCL's usual number of exclusions.

Annex A - Reporting Measures

Measure	Source of data	Description	Result
1. Number of customers about whom there have been observations.	Christchurch Casino	The total number of Christchurch Casino customers who have been observed showing one or more signs of problem gambling. These observations are reported in the Host Responsibility Log, Surveillance GOI reports and Security Incidents.	Total = 2791 Surveillance reports for patrons under active observation = 772 Specific GOI information referenced on surveillance reports = 470 Strong indications of problem gambling observed on reports = 14 Observations made by staff from other departments = 1535
2. Number of indicators reported to Host Responsibility.	Christchurch Casino	Total number of observed indicators of problem gambling in Host Responsibility Log and GOI reports.	1835
3. Number of approaches to Christchurch Casino by third parties.	Christchurch Casino	Number of people approaching Christchurch Casino with concerns about a customer.	12
4. Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of problem gamblers identified by the Casino.	Christchurch Casino		209 exclusions in total = 114 Self-exclusions, 95 Casino-exclusions.
5. Number of customers on incident spreadsheet.	Christchurch Casino	Number of individual customers in the Host Responsibility Log	952

<p>6. Number of GOI files by:</p> <ul style="list-style-type: none"> - Ethnicity - Gender - Age - Preferred mode of gambling (tables/EGMs). 	<p>Christchurch Casino</p>	<p>Number of GOI files that were opened in 2015 with breakdowns by ethnic, gender, age and preferred mode of gambling (table games or gaming machines), includes confirmation of re-entry GOI's created.</p>	<p>Total = 107</p> <p>European - 42 Asian - 40 Indian - 10 Maori/Islander - 9 Arab - 5 African - 1</p> <p>69 x Male, 38 x Female</p> <p>20-29 yrs = 15 30-39 yrs = 29 40-49 yrs = 18 50-59 yrs = 20 60+ yrs = 24 Not specified = 1</p> <p>Gaming Machines = 43 Table Games = 51 Not Specified = 13</p>
<p>7. Number of interventions conducted with customers.</p>	<p>Christchurch Casino</p>	<p>Total of Security reports entitled Casino or Self Exclusion, Interview conducted, Third party enquiries, Breach of Exclusion, Children found abandoned, HR Customer Contact or Enquiry and re-entry interviews whether confirmed or denied.</p>	<p>671</p>
<p>8. Number of approaches to customers to offer information about self-exclusion.</p>	<p>Christchurch Casino</p>	<p>Total number of times information about Self exclusion in the form of written material has been offered, given or mailed to customers and third parties.</p>	<p>82</p> <p>CCL offers information about Self-Exclusion in written form at many points of interaction with customers routinely, such as with loyalty tier upgrades, at the Cash Desk, or attached to correspondence between a customer or third party and Host Responsibility.</p> <p>Any single customer may have received such information on several occasions within 2015.</p>

<p>9. Number of Exclusions by:</p> <ul style="list-style-type: none"> - Ethnicity - Gender - Age - Preferred mode of gambling (tables/EGMs) - Prompted by third party disclosures - Exclusion type (Self/Casino) - Timeframe - Following re-entry 	<p>Christchurch Casino</p>		<p>Total individuals Excluded = 209</p> <p>Total Exclusions issued =211 (Two individuals 2x)</p> <p>European - 82 Asian - 67 Indian - 34 Maori/Islander - 20 Arab - 4 African - 2</p> <p>163 x Male, 46 x Female</p> <p>20-29 yrs = 59 30-39 yrs = 50 40-49 yrs = 39 50-59 yrs = 36 60+ yrs = 23 Not Specified = 2</p> <p>Gaming Machines = 62 Table Games = 107 Games not specified = 40</p> <p>4</p> <p>114 Self-exclusions 97 Casino-exclusions</p> <p>24 Months = 140 18 Months = 0 12 Months = 19 06 Months = 9 03 Months = 43</p> <p>8 Re-Excluded</p>
<p>10. Number of customers participating in multi venue Exclusions.</p>	<p>Christchurch Casino</p>		<p>29 MVE applications processed. 28 were initiated by PG treatment providers.</p>
<p>11. Number of customers participating in multi casino Exclusions.</p>	<p>Christchurch Casino</p>	<p>Total is all patrons notified to Christchurch Casino that have been excluded from other casinos in NZ.</p>	<p>630</p>
<p>12. Number of customers participating in Agreed Limitation programme.</p>	<p>Christchurch Casino</p>	<p>Customers participating in VIP Agreed Limitation arrangements over the reporting period.</p>	<p>0</p>

<p>13. Number of Excluded customers agreeing to be contacted by help services on exclusion form.</p>	<p>Christchurch Casino</p>	<p>While Christchurch Casino encourages all customers during the exclusion process to seek help from problem gambling service providers, ultimately this is a decision for the customer.</p> <p>It should also be noted that excluded customers may contact counselling services independently after their exclusion and the Casino would not be notified. Excluded customers are required to undergo counselling as part of re-entry conditions.</p>	<p>3</p>
<p>14. Number of new and total clients citing casino gambling (by EGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counselling services by:</p> <ul style="list-style-type: none"> - Gamblers - Significant others - Mean SOGS scores - Ethnicity - Gender - Age - Self-reported dollars lost 	<p>MoH Report</p>	<p>The Ministry of Health no longer reports service user data as shown in this particular measure (14) or in measure 15. (Average SOGS scores). The only service user data now reported by MoH by gambling mode is the total number of clients (both new and continuing) that have received support for their own, or someone else's gambling.</p>	
<p>15. Average SOGS scores of clients citing casino gambling as the primary mode who utilise face-to-face counselling services.</p>	<p>MoH Report</p>	<p>Refer to comment in measure 14. above.</p>	

<p>16. Number of breaches of Exclusion by:</p> <ul style="list-style-type: none"> - Ethnicity - Gender - Age 	Christchurch Casino	Breaches of current Self and Casino exclusions regardless of length of exclusion result in a two year trespass notice being issued and the Gambling Inspectors notified for any further action if required.	<p>Total = 36</p> <p>Asian = 12 European = 12 Indian = 6 Maori/Islander = 3 Arab = 3</p> <p>Male 31, Female 5</p> <p>20 to 29 yrs = 17 30 to 39 yrs = 8 40 to 49 yrs = 7 50 to 59 yrs = 1 Over 60 yrs = 3</p>
17. Number of successful and unsuccessful applications to re-enter following exclusion.	Christchurch Casino		<p>37 re-entry applications received and interviews conducted.</p> <p>33 x allowed re-entry 4 x declined re-entry.</p>
18. The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and employee).	Christchurch Casino	Total of all patrons in HR log, interviews, plus all exclusions created or renewed, HR Enquiries and HR Customer Contacts.	1575
19. Number of persons trespassed or required to leave for making loans for financial gain.	Christchurch Casino		0

Measures relating to Responsible Consumption of Alcohol

20. Number of "Under the Influence" (UTI) incidents (internal report).	Christchurch Casino	Christchurch Casino for full 12 months reporting, includes Mashina Lounge. (NB CCL has improved its reporting process to capture all incidents in a single database)	<p>3935</p> <p>Casino - 2870 Mashina - 1065 (Patrons approached to assess UTI)</p>
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<p>21. Number of requests for people to leave due to the amount of alcohol consumed.</p>	<p>Christchurch Casino</p>	<p>Christchurch Casino for full 12 months reporting includes Mashina Lounge. (NB Number of incidents which have resulted in a request to leave. Some incidents have involved more than one person)</p>	<p>Total = 2038 Casino = 1398 Mashina = 640</p>
<p>22. Number of Police contacts citing Christchurch Casino as venue where their last drink was served.</p>	<p>Police Alcolink database</p>	<p>The Police Alcolink is an indicative tool only. The Police have also indicated they enjoy a good working relationship with the Casino and have no significant concerns.</p>	<p>The Police Alcolink database records 30 separate references in relation to CCL. (33 individuals of which 26 were male and 7 female) Of the 33 individuals the degree affected by alcohol is stated as:</p> <ul style="list-style-type: none"> • 0 Not recorded • 10 slight • 21 moderate • 2 extreme <p>The incidents may be summarised as: 11 Behaviour related 11 Driving related 8 No relevance to Casino (6 Assaults, 1 Police Warrants / Arrests 1 Domestic)</p> <p>A total of 6 of the incidents reported were initiated by CCL.</p> <p>To put the above figures into context the Casino venue had a total of 794,388 guests including 76,162 into our specialist Mashina Lounge for the 2015 year. Therefore the 33 individuals noted represent just 0.0042% of our total visitation.</p>

Measures relating to Employee Training			
<p>23. HR1 courses</p> <p>HR2 courses</p> <p>HR3 courses</p> <p>Refresher training</p> <p>Number of employees who need to be trained in each category, and proportion of those employees that have completed the appropriate level training.</p> <p>Responsible Service of Alcohol training</p>	<p>Christchurch Casino</p>		<p>Level 1 (Induction) 106 trained 5 pending</p> <p>Problem Gambling Awareness</p> <p>282 Licensed Employees</p> <p>271 PG trained 11 pending</p> <p>33 PG trained in 2015 130 PGR trained in 2015</p> <p>Responsible Service of Alcohol</p> <p>151 F&B front of house and management employees</p> <p>51 trained 28 pending</p>
<p>24. Employee recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures.</p>	<p>Christchurch Casino</p>	<p>The only measure of this to date under the HRP is the results as in 26. Below relating to the testing conducted during HRP training in 2015.</p>	<p>Average over all courses $18.25/20 = 91.25\%$</p>
<p>25. Employee Perceptions on the effectiveness of the Employee Gambling Harm Programme.</p>	<p>Christchurch Casino</p>	<p>CCL is still developing a process to measure this.</p>	<p>CCL is still developing a process to measure this</p>
<p>26. Results of tests conducted by employees relating to host responsibility and associated policies and procedures.</p>	<p>Course Evaluations</p>	<p>Average over all Courses conducted in 2015.</p>	<p>Average over all courses $18.25/20 = 91.25\%$</p>
<p>27. Employees' perceptions of the effectiveness of training.</p>	<p>Course Evaluations</p>	<p>Average over all Courses conducted in 2015, scale of 1 - 7, 1 = poor, 7 = excellent.</p>	<p>Average over all courses = 6.5</p>

Other Programme activity and compliance-related measures

28. Number of internal and external underage incidents.	Christchurch Casino	Number of underage customers found onsite however were not participating in gaming.	5
29. Number of unattended children.	Christchurch Casino	Incidents where parents or guardians were visiting the casino while they left their child/children unaccompanied.	0
30. Number of people requested to leave the Casino for other reasons.	Christchurch Casino		27
31. Completion of brochure addressing "Children at the Casino".	Christchurch Casino		Completed 2013.