



CHRISTCHURCH  

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CASINO

**HOST RESPONSIBILITY PROGRAMME  
CHRISTCHURCH CASINOS LIMITED**

**Report to the Gambling Commission  
For the 12 months ending  
31 December 2017**

# TABLE OF CONTENTS

**1. Introduction..... 3**

**2. Resources..... 3**

**3. Key Areas of Activity..... 4**

**Appendix A – Reporting Measures...**

## 1. Introduction

This is Christchurch Casinos Limited's (CCL) fifth report on the implementation of its Host Responsibility Programme (HRP) and Problem Gambler Identification Policy (PGIP).

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 a gambler's 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 2017 achieved the objectives in the HRP. CCL will continue to measure, analyse 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 2017. Appendix A of the report contains the gambling related measures required by section 3 of the HRP.

This reporting year saw significant increases in some measures, particularly around the volume of reporting from all employees to Host Responsibility, the number of Gambler of Interest (GOI) files opened and managed and the number of interventions conducted by Host Responsibility. Notably however, the number of people excluded did not increase by near the proportions seen in those other measures. CCL attributes this to our increased focus on monitoring and early intervention, with the aim of preventing harm through being as proactive as possible with our Host Responsibility.

## 2. Resources

CCL has a dedicated Host Responsibility Executive (HRE) to oversee all aspects of the HRP and PGIP. The HRE is supported at a senior management level by the Host Responsibility Group (HRG) which includes the HRE, Risk and Compliance Manager, Asset Protection and Responsible Gaming Manager, Gaming Manager, Food and Beverage Manager, Security Manager, VIP Manager, Cash Desk 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.

During the 2017 year two additional, full-time, officer-level positions were created to provide support to the HRE in the operational implementation of the HRP. The HRE and officers deal with the day-to-day implementation of the HRP, including interventions, exclusions and re-entry interviews. In the absence of the HRE and HR officers (Host Responsibility), 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 casino has continued to focus on maximising all employees' awareness of Problem Gambling indicators and the immediate response to observations or incidents of concern. This focus has been in the form of new and revised procedures, re-developed training and increased resources.

At the front-line level, all CCL staff are trained in both Problem Gambling Awareness (PGA) and the Responsible Service of Alcohol (RSA). All staff in all Departments are responsible for observing any signs of possible problem gambling or other issues and reporting those observations to either an appropriately trained employee or Host Responsibility 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 via the Host Responsibility (HR) Log, part of an internal security and surveillance database which the Host Responsibility have access to. Events that require immediate intervention, for example a customer requesting a Self-Exclusion, are escalated and dealt with immediately either by Host Responsibility or the Security Shift Manager. The entries in the HR Log are analysed by Host Responsibility and form a valuable part of the base information collected to assist in achieving the objectives of the HRP.

The increased number and variety of entries in the HR Log reflect the good level of awareness and care of front line staff towards this process. An important part of the process is that Host Responsibility responds to each entry made detailing the actions taken. This allows staff to 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 the internal security and surveillance database. The HR Log entries, along with loyalty data and surveillance and security observations give Host Responsibility the best possible information to work with in assessing and identifying actual and potential problem gamblers.

This year has again seen a continued increase in the number of reports of observations and interactions from all areas of the business to Host Responsibility. We believe this increase is in part due to the continuously-developed Host Responsibility training completed during the year, as well as the increased numbers of employees regularly completing Host Responsibility training; in 2016, the casino began scheduling all staff into the Problem Gambling Awareness refresher course, further capitalising on the large number of non-licensed employees who interact with customers.

Servizio, the real-time, mobile Host Responsibility reporting and alerts system continues to be used to alert key staff of customers' Continuous Play, as well as Persons of Interest and Gamblers of Interest. Servizio has been particularly useful in prompting approaches to customers as a result of Continuous Play on gaming machines, whether 'carded' or 'uncarded'. The requirements pertaining to the monitoring and interventions after customers' Continuous Play or Continuous Presence in the 2016-approved HRP have also contributed to the increased number of reports made to Host Responsibility.

Data collection, recording and analysis has been a key point of focus during this year. The collection of quality information has been key and the increased resources in Host Responsibility have assisted with such. Host Responsibility continues to develop new tools and look more closely into the increasing amount of available data to identify areas of risk and develop more effective processes to detect indicators of gambling-related harm, identify potential Problem Gamblers and intervene more effectively with them.

### **3.2 PRE-COMMITMENT**

CCL enabled the pre-commitment module of the new Bally Casino EMS in April 2013 as 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 and they are asked to leave.

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 more effectively monitored.

Generally the pre-commitment system has been well received by the small percentage of gaming machine customers who have taken advantage of it. Continued 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 their 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.

These meetings give 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 and improvements made to the way the organisations and HRE work together in support of the client/customer.

The HRE also has regular contact with the Department of Internal Affairs Gambling Inspectors to discuss operational events and also as part of the Department's normal audit programme for monitoring the HRP.

CCL was again a presenter at the National Association for Gambling Studies (NAGS, Inc.) conference, which was held in Melbourne in 2017. Our Servizio real-time Host Responsibility reporting and alerts system, developed through a collaborative effort with Scientific Games Inc., was presented and received positive feedback from delegates representing other operators, regulators, research organisations and support services.

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 2017. CCL was a finalist in the "Excellence in Host Responsibility" category.**

In 2017 CCL was judged winner finalist of the Hospitality NZ awards in the category of "Excellence in Host Responsibility". CCL had won the award the previous four years running. CCL's entry again received support from the Christchurch City Council District Licensing Committee.

#### **Victoria Street Safe (VSS) Initiative**

The casino again worked with a variety of neighbouring businesses during the peak trading period between the start of 'Cup & Show Week' 2017 and the end of January 2018 in running this initiative. The casino organised and financially contributed to the employment of security personnel as VSS ambassadors, who patrolled the area along Victoria Street deterring and responding to any undesirable behaviour or other incidents.

#### **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. CCL has continued to work with the problem gambling service providers to see improvement in the information provided to us with MVE requests. The quantity of information pertaining to SkyCity exclusions notified to CCL has proved challenging at times, but has been managed; this number is far greater than CCL-based exclusions.

## **Servizio system**

Servizio continued to be developed in collaboration with Bally Technologies during 2017. The pioneering system in Host Responsibility allows gaming floor staff to immediately make reports of observations and interactions to Host Responsibility via a mobile device (iPod Touch).

Key staff also receive Host Responsibility alerts on Continuous Play and High Bet to which they can respond and report back on. These play intensity variables were previously challenging to monitor, as reports inherently operate retrospectively; Servizio provides real-time alerts and notifications which are completely configurable to suit the needs of individual properties.

We have found Servizio allows for markedly improved monitoring of both carded and uncarded players, particularly those who do not display behavioural indicators of Problem Gambling. The result is more interactions and interventions with players and the collection of important information used to prevent harm.

The system is also able to alert for a Gambler of Interest (GOI), Person of Interest (POI) and a banned person. These list-based alerts allow us to monitor such customers more effectively, or in the case of banned persons, detect and locate them and respond promptly.

The Servizio system and its use continues to be developed with the aim of maximising its support to the implementation of our HRP. As an example, in 2017, the casino began working to develop an alert via Servizio for Continuous Presence.

## **Sixty6 on Peterborough function and event venue**

CCL identified benefits from better utilising the versatile space that was Mashina Lounge as a dedicated function and event venue. The new direction for this arm of the business was reflected in the name change to Sixty6 on Peterborough, with the re-branding completed in July 2016. We can see from the RSA-related measures for the 2017 year below that this change has had a positive effect on the numbers of people both assessed as 'under the influence', as well as those 'asked to leave' due to the amount of alcohol consumed. These results were not particularly surprising, given the different nature of the venue now.

## **Facial Recognition technology introduction**

CCL commenced the trialling of a Facial Recognition system in 2017. Whilst installed and in use, the system is still under development to maximise its efficacy and consider additional uses for it. The system relies on quality photographs of individuals being loaded into its database under certain categories, such as being a 'Gambler of Interest' (GOI) or an 'Banned Person'. The system is being very much used to assist in the implementation of our HRP, by helping to detect GOIs and those Excluded or Trespassed, as well as other Persons of Interest. The system has immense value in helping identify Banned Persons at the earliest opportunity from attempting to enter and or remain in the casino premises.

## ANNEX A - REPORTING MEASURES

To ensure consistency with previous years' reports, we have used the same criteria to generate the figures in results; however, more detailed descriptions of the results have been provided for some of the reporting fields.

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. Results pertain to all reports concerning all customers; some customers may have more than one attributed report.	Total = 5335 Surveillance reports for patrons under active observation = 614 Specific GOI information referenced on surveillance reports = 291 Strong indications of problem gambling observed on reports = 56 Observations made by staff from other departments = 4374
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.	Total = 4988 HR Log = 4374 GOI reports = 614
3. Number of approaches to Christchurch Casino by third parties.	Christchurch Casino	Number of people approaching Christchurch Casino with concerns about a customer.	24
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	Number of individuals issued with either a Self-Exclusion or Casino-Exclusion.	298 exclusions in total = 113 Self-exclusions, 185 Casino-exclusions.
5. Number of customers in Host Responsibility Log.	Christchurch Casino	Number of individual customers in the Host Responsibility Log.	2711

<p>6. Number of GOI files by:</p> <ul style="list-style-type: none"> <li>- Ethnicity</li> <li>- Gender</li> <li>- Age</li> <li>- Preferred mode of gambling (tables/EGMs).</li> </ul>	<p>Christchurch Casino</p>	<p>Number of GOI files that were opened in 2017 with breakdowns by ethnic, gender, age and preferred mode of gambling (table games or gaming machines), includes confirmation of re-entry GOI's created. Results also include individuals with a GOI file created prior to and had it re-opened during 2017.</p>	<p>Total = 237  European - 81  Asian - 96  Indian - 36  Maori/Islander - 20  Arab - 4  African - 0</p> <p>173 x Male, 64 x Female</p> <p>20-29 yrs = 60  30-39 yrs = 64  40-49 yrs = 37  50-59 yrs = 30  60+ yrs = 44  Not specified = 2</p> <p>Gaming Machines = 95  Table Games = 132  Not Specified = 10</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 and re-entry interviews whether confirmed or denied.</p>	<p>992</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>1451</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 Host Responsibility and a customer or third party.</p> <p>Any single customer may have received such information on several occasions within 2017.</p>

<p>9. Number of Exclusions by:</p> <ul style="list-style-type: none"> <li>- Ethnicity</li> <li>- Gender</li> <li>- Age</li> <li>- Preferred mode of gambling (tables/EGMs)</li> <li>- Prompted by third party disclosures</li> <li>- Exclusion type (Self/Casino)</li> <li>- Timeframe</li> <li>- Following re-entry</li> </ul>	<p>Christchurch Casino</p>		<p>Total individuals Excluded = 289</p> <p>Total Exclusions issued = 298 (9 individuals 2x)</p> <p>European – 93  Asian - 113  Indian - 55  Maori/Islander – 19  Arab – 9  African - 0</p> <p>221 x Male, 68 x Female</p> <p>20-29 yrs = 92  30-39 yrs = 94  40-49 yrs = 37  50-59 yrs = 35  60+ yrs = 31</p> <p>Gaming Machines = 88 Table Games = 182  Games not specified = 19</p> <p>11</p> <p>113 Self-exclusions  185 Casino-exclusions</p> <p>24 Months = 135  12 Months = 25  06 Months = 37  03 Months = 101</p> <p>16 Re-Excluded</p>
<p>10. Number of customers participating in multi venue Exclusions.</p>	<p>Christchurch Casino</p>		<p>19 MVE applications processed. 15 were initiated by PG treatment providers, 1 by other casinos, 3 by CCL</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>728</p>

12. Number of customers participating in Pre-Commitment	Christchurch Casino	Customers currently enrolled in Pre-Commitment as at 31/12/2017	433
13. Number of Excluded customers agreeing to be contacted by help services on exclusion form.	Christchurch Casino	<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 may be required to undergo counselling as part of re-entry conditions.</p>	2
14. Number of breaches of Exclusion by: <ul style="list-style-type: none"> <li>- Ethnicity</li>   <li>- Gender</li>   <li>- Age</li> </ul>	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.	Total = 64 Asian = 24 Indian = 13 European = 18 Maori/Islander = 6 Arab = 2 African = 1  Male 56, Female 8  20 to 29 yrs = 23 30 to 39 yrs = 21 40 to 49 yrs = 15 50 to 59 yrs = 2 Over 60 yrs = 3
15. Number of successful and unsuccessful applications to re-enter following exclusion.	Christchurch Casino		76 re-entry applications received and interviews conducted.  59 x allowed re-entry 17 x declined re-entry.

16. Number of persons trespassed or required to leave for making loans for financial gain.	Christchurch Casino		0
17. Number of customers enrolled to use SET	Christchurch Casino	All customers with SET transactions during 2016	49
18. Number of customers with a GOI file opened after enrolling to use SET	Christchurch Casino	SET users with a GOI file created in 2017	6
19. Number of customers Casino-Excluded or Self-Excluded after enrolling to use SET	Christchurch Casino	SET users Excluded during 2017	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 Sixty6. Patrons approached to assess UTI.	Total = 2411  Casino = 2289 Sixty6 = 122
21. Number of requests for people to leave due to the amount of alcohol consumed.	Christchurch Casino	Christchurch Casino for full 12 months reporting includes Sixty6. Number of incidents which have resulted in a request to leave. Some incidents have involved more than one person.	Total = 867  Casino = 838 Sixty6 = 29
22. Number of Police contacts citing Christchurch Casino as venue where their last drink was served.	Police Alcolink database	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.	The Police Alcolink database records 19 separate references in relation to CCL. (19 individuals of which 18 were male and 1 female)  Of the 19 individuals the degree affected by alcohol is stated as: <ul style="list-style-type: none"> <li>• 0 Not recorded</li> <li>• 2 slight</li> <li>• 17 moderate</li> <li>• 0 extreme</li> </ul>

			<p>The incidents may be summarised as:</p> <ul style="list-style-type: none"><li>9 Behaviour</li><li>8 Driving</li><li>0 Trespass</li><li>1 Assaults</li><li>1 Domestic</li></ul> <p>To put the above figures into context the Casino venue had a total of 739,266 guests including 22,007 into Sixty6 function space for the 2017 year.</p> <p>Therefore the 19 individuals noted represent just 0.0025% or 1/38,909 of our total visitation.</p>
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## Measures relating to Employee Training

<p>23. HR Level 1 courses</p> <p>HR2 courses (PG)</p> <p>HR3 courses</p> <p>Refresher training (PGR)</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>HR Level 1 (Induction) 126 trained in 2017 6 pending</p> <p>Problem Gambling Awareness</p> <p>285 Licensed Employees</p> <p>280 HR2 trained 5 pending</p> <p>33 HR2 trained in 2017</p> <p>8 HR3 trained in 2017</p> <p>184 PGR trained in 2017</p> <p>Responsible Service of Alcohol</p> <p>111 F&amp;B front of house and management employees</p> <p>40 trained in 2017 35 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>Average over all Courses conducted in 2017.</p>	<p>Average over all courses 17.81/20 = 89.05%</p>
<p>25. Employee Perceptions on the effectiveness of the Employee Gambling Harm Programme.</p>	<p>Christchurch Casino</p>	<p>CCL has included this aspect in our 2018 survey of employees and will be reported on next year.</p>	<p>CCL has included this aspect in our 2018 survey of employees and will be reported on next year.</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 2017.</p>	<p>Average over all courses 17.81/20 = 89.05%</p>
<p>27. Employees' perceptions of the effectiveness of training.</p>	<p>Course Evaluations</p>	<p>Average over all Courses conducted in 2017, 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 gambling.	2
29. Number of unaccompanied children where the caregiver is not gambling.	Christchurch Casino	Incidents where parents or guardians were in the casino and not gambling while they left their child/children unaccompanied.	3
30. Number of unaccompanied children where the caregiver is gambling.	Christchurch Casino	Incidents of unaccompanied children where the parent or caregiver was gambling.	2
31. Number of supervised children in our surrounds where the caregiver is not gambling.	Christchurch Casino	Incidents of children supervised with a parent or caregiver in the casino and not gambling.	5
32. Number of supervised children in our surrounds where the caregiver is gambling.	Christchurch Casino	Incidents of children supervised while a caregiver is gambling.	6
33. Number of people trespassed or requested to leave the Casino for other reasons.	Christchurch Casino		315