

**IN THE MATTER** of the Gambling Act 2003

**AND** the amendment by the Gambling Commission of the Host Responsibility Programmes for the Hamilton, Queenstown and Wharf casinos

**BEFORE THE GAMBLING COMMISSION**

Members: G L Reeves (Chief Gambling Commissioner)  
L M Hansen  
R D Bell

Date of Decision: 11 July 2014

Date of Notification of Decision: 22 August 2014

**DECISION**

**ON THE AMENDMENT BY THE GAMBLING COMMISSION OF THE HOST RESPONSIBILITY PROGRAMMES FOR THE HAMILTON, QUEENSTOWN AND WHARF CASINOS**

**Introduction**

1. By this decision, the Gambling Commission ("**Commission**") revokes the Host Responsibility Programmes ("**HRPs**") that it approved for the Hamilton and Queenstown casinos on 11 May 2012, and the HRP that it approved for the Wharf casino on 14 September 2012, and approves in their place a single HRP for the Queenstown and Wharf casinos, and a separate HRP for the Hamilton casino. The newly approved HRPs are **attached** to this decision.

**Process**

2. Condition 29 of the licence conditions attached to SKYCITY Casino Management Limited's ("**SCML**") operator's licence for the Hamilton and Queenstown casinos provides that the Commission will review the HRPs for these casinos every two years. The Commission's last review concluded in May 2012 with decision GC14/12 revoking the then existing HRPs, and approving new HRPs in their place.
3. Condition 28 of SCML's operator's licence for the Wharf casino provides that the Commission will review the HRP for that casino every two years. The Commission's last review for the Wharf casino concluded in September 2012 with decision GC27/12 revoking the then existing HRP, and approving a new HRP in its place.
4. On 13 February 2014, the Commission wrote to SCML inviting it to submit for review draft HRPs for the Hamilton, Queenstown and Wharf casinos. The Commission received

SCML's response on 4 April 2014. SCML proposed a single HRP for the Queenstown and Wharf casinos and a separate HRP for the Hamilton casino. SCML also proposed a single Problem Gambler Identification Policy ("**PGIP**") for application at all three casinos.

5. Potentially interested parties comprising the Secretary for Internal Affairs ("**Secretary**"), the Ministry of Health ("**MoH**"), Problem Gambling Foundation, Lifeline Aotearoa ("**Lifeline**"), Salvation Army, and the Wakatipu Casino Liaison Committee (in relation to the Queenstown and Wharf casinos) were invited to file written submissions on the HRPs (and PGIP) proposed by SCML.
6. The Commission received submissions from Lifeline, the Secretary and MoH. Lifeline, the Secretary, MoH and SCML were provided with copies of the submissions filed by the other parties and offered the opportunity to file submissions in reply. MoH and SCML elected to do so.
7. The Commission considered SCML's proposals and all submissions received at its July 2014 meeting. The Commission identified a small number of matters requiring further consideration and communicated those to SCML, before approving the HRPs (and PGIP).

### **Jurisdiction**

8. Condition 26 of the licence conditions attached to SCML's operator's licence for the Hamilton and Queenstown casinos specifies the matters that the HRPs must address, as follows:

26. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
  - (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
  - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
  - (c) the provision of loss and expenditure data to individual loyalty programme members;
  - (d) identification of problem gamblers and steps to be taken following identification. This shall include, as a minimum, the following:
    - (i) an acceptable definition of problem gambling;
    - (ii) indicators of problem gambling in the gambling venue;
    - (iii) the steps to be taken by the Licence Holder in identifying problem gamblers;

- (iv) the steps to be taken by the Licence Holder following identification of problem gamblers;
- (e) the provision of staff training;
- (f) the provision of exclusion, self-exclusion and limitation programmes;
- (g) assistance to casino employees with managing the potential for personal problem gambling;
- (h) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
- (i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;
- (j) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
- (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
- (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
- (m) standards of dress and behaviour at the casino;
- (n) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
- (o) liaison with problem gambling treatment providers, community service organisations and community representatives; and
- (p) such other matters as the Commission may require.

9. Condition 25 of the licence conditions attached to SCML's operator's licence for the Wharf casino specifies the matters that the HRP must address for that casino, as follows:

25. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
- (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
  - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
  - (c) the provision of loss and expenditure data to individual loyalty programme members;
  - (d) identification of problem gamblers and steps to be taken following identification. This shall include, as a minimum, the following:

- (i) an acceptable definition of problem gambling;
- (i) indicators of problem gambling in the gambling venue;
- (ii) the steps to be taken by the Licence Holder in identifying problem gamblers;
- (iii) the steps to be taken by the Licence Holder following identification of problem gamblers;
- (e) the provision of staff training;
- (f) the provision of exclusion, self-exclusion and limitation programmes;
- (g) assistance to casino employees with managing the potential for personal problem gambling;
- (h) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
- (i) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restrictions on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;
- (j) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
- (k) design of the Gambling Area to minimise problem gambling behaviour and to maximise the likelihood that episodes of problem gambling will be noticed and addressed by staff;
- (l) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
- (m) standards of dress and behaviour at the Casino;
- (n) liaison with patrons with gambling problems, and family members of patrons with gambling problems;
- (o) liaison with problem gambling treatment providers, community service organisations and community representatives;
- (p) the provision of a safe gambling environment at the Casino; and
- (q) such other matters as the Commission may require.

10. The attached HRPs address the matters specified by these licence conditions, many of which, in turn, specify how SCML will implement obligations under the Gambling Act 2003 (“Act”) and Regulations.

11. In relation to sub-conditions (d) and (f), sections 308-311 of the Act set out particular obligations relating to the identification of problem gamblers and exclusion procedures. Section 308(1) requires the holder of a casino operator’s licence to develop a programme or policy for identifying problem gamblers. A notice advising customers of the existence of this policy must be displayed and a copy of the policy made available on request.

12. Section 308(4) provides that:

The persons required by subsection (1) to develop a policy for identifying problem gamblers must take all reasonable steps to use that policy to identify actual or potential problem gamblers.

13. Sections 309(1) and (2) of the Act require the holder of a casino operator's licence to approach and provide information to every person identified under section 308(4) as a person whom the Licence Holder has reasonable grounds to believe is a problem gambler. Section 309(3) provides that an exclusion order may be issued to a problem gambler identified under section 308, while section 310 specifies when an exclusion order must be issued.
14. Both HRPs specify how SCML will exercise its discretion to exclude a problem gambler who has not requested exclusion.

### **Submissions to the Commission**

15. As the HRPs proposed by SCML closely followed the HRP approved by the Commission in August 2013 for the Auckland casino, the submissions, and the Commission's own analysis, identified relatively few substantive matters that required consideration. Those matters are as follows:

- consolidating the Queenstown and Wharf HRPs;
- a difference in the Gambling Limitation programmes between casinos; and
- amendments to the Learning and Development section.

#### *Consolidating the Queenstown and Wharf HRPs*

16. SCML proposed to replace two separate HRPs for the Queenstown and Wharf casinos with a single document that would apply to both sites. SCML submitted that the casinos previously had separate operators so separate HRPs were appropriate. However SCML now operates both casinos with the same personnel so it is appropriate that a single HRP should apply to both casinos.
17. The Secretary and Lifeline confirmed that they had no objection to this proposal. The Secretary noted that the Wharf casino utilises a different operating system from that deployed at the Queenstown casino and that this explains the absence of a voluntary pre-commitment scheme at the Wharf casino. Wharf instead maintains its current VIP agreed limitation programme. The Secretary expressed the view that this difference is appropriately reflected in the Queenstown/Wharf HRP.
18. The Commission was of the view that SCML's proposal to operate a single HRP at both Queenstown sites raised no issues of regulatory concern. SCML's rationale for doing so

was sound and the Commission considered it sensible for SCML's Queenstown staff to utilise one HRP applying to both casinos, to limit potential for confusion by operating separate HRPs for each.

19. What was important for the Commission was that each casino has a current HRP which imposes appropriate obligations. SCML's proposal does this, with the differences in the application of the HRP between the two Queenstown casinos being appropriately and clearly indicated.

#### *Gambling limitation*

20. SCML proposed the removal of the former VIP agreed limitation programme for the Hamilton and Queenstown casinos and its replacement with a voluntary pre-commitment system which is not limited to VIP patrons. SCML has retained the VIP agreed limitation programme for the Wharf casino only because its operating system does not allow for the deployment of voluntary pre-commitment at that site.
21. Lifeline indicated that it had no objection to this proposal, while the Secretary noted that this section of the HRP adequately records the difference between the Queenstown sites.
22. The Commission considered SCML's approach to be appropriate. With the Commission's approval, SCML removed the VIP agreed limitation programme at the Auckland casino, because it had a very low uptake and was difficult to give effect to, and replaced it with a voluntary pre-commitment system. Because of the established shortcomings in the VIP agreed limitation system, it is appropriate that SCML should make a similar change to the Queenstown and Hamilton HRPs.
23. SCML has retained the VIP agreed limitation programme at the Wharf casino (owing to the limitations of the existing management system). The Commission considered this to be appropriate for the present. SCML has been operating the Wharf casino for a relatively short period of time and has inherited, from the previous operator, different systems and structures from those offered by SCML at its other sites. The Commission recognises that it will take time for SCML to make the same changes to the Wharf casino. It expects that SCML will have achieved relative uniformity of its systems across all of its venues by the time of the next HRP review for the Hamilton and Queenstown casinos so that, in relation to Gambling Limitation, SCML will offer the same limitation options at the Wharf casino as it does at its other three sites.
24. The Commission has made a number of minor edits to this section in order to improve clarity.

*Learning and development*

25. SCML submitted that it has retained the learning and development provisions from the existing Hamilton, Queenstown and Wharf casinos' HRPs (rather than duplicating them from the recently approved Auckland document) owing to the scale of the properties under review. It submitted that the content, obligations and approach are essentially the same as for Auckland, but reflect the smaller size of the other three properties. This means, in its submission, that SCML Management is better able to appraise the need for additional training and identify deficiencies, if there are any, which can then be addressed.
26. SCML then submitted that, although it has removed a number of elements of its current teaching model (for example, staff no longer need to complete a self-guided workbook following the initial training for level 1 host responsibility), what it has proposed is the most effective means of training staff at the Hamilton, Queenstown and Wharf casinos.
27. The Secretary submitted that he does not necessarily object to SCML determining how best to train its staff, and noted that SCML's proposal for classroom-based training and direct interaction with staff has the potential to be a sufficient and effective means of disseminating knowledge and testing understanding. Having said that, however, he thought that SCML had not provided enough detail for him to know whether the proposed amendments would be wholly positive. As such, he submitted that he would welcome a more in depth explanation of the analysis and rationale leading to SCML's proposals.
28. In its submissions in reply, MoH supported the Secretary's submissions, stating that SCML's proposals may result in better outcomes, but that SCML did not adequately describe how these better outcomes would be quantified, monitored or reported. Lifeline was supportive of SCML's proposals.
29. In response, SCML maintained that the most effective means to train its staff at these casinos is in the manner that it has proposed. It submitted that the experience from its host responsibility trainers and staff is that self-guided workbooks, for example, have been a relatively clumsy and impractical way to reinforce information delivered in level 1 host responsibility training. It said that they did not necessarily strengthen effective host responsibility learning and/or implementation at the Hamilton, Queenstown and Wharf sites. However, having considered considering the Secretary's submissions, it proposed adding the following paragraphs to the Learning and Development section of the HRPs (under the "Refresher Training" sub-heading):

HR1 refresher training will be delivered annually. An assessment of areas of focus is to be made prior by host responsibility staff and managers, and discussed with host

responsibility training staff. Recall testing will be included in this regular refresher training.

Additional refresher training can be provided when a learning and development need is identified or requested.

30. In the Commission's view, the training of casino staff is of central importance to the deployment of effective host responsibility; if staff are inadequately trained and/or have inadequate support, they will not be in a position to respond appropriately to any problems, if they arise. The Commission therefore gave serious consideration to the reservations expressed by the Secretary (and MoH), in particular whether the amendments proposed by SCML would result in less effective training of its staff.
31. The Commission was in a similar situation when it reviewed the HRP for the Auckland casino in 2013 when the Secretary queried aspects of SCML's proposed induction training. Ultimately the Commission concluded that, unless there appeared to be a problem arising from insufficient or inadequate training, SCML should be permitted to determine how best to train its staff. At paragraph 164 of decision GC21/13, the Commission noted that:

... [It] was of the view that, unless it appears that there are problems caused by inadequate training, it is prepared to allow SCML to determine how it trains its staff. The Commission notes that SCML has clear host responsibility obligations which it must adhere to. If SCML trains its staff poorly, it could fall short of these obligations, risking the possibility of suspension or cancellation of licence. In this context, SCML is adequately incentivised to train its staff well. The Commission therefore saw no need to amend further this aspect of the HRP in the absence of any evidence that the current training is inadequate.

32. In considering SCML's current proposal for the Hamilton and Queenstown casinos, the Commission was of the view that the approach that it articulated in decision GC21/13 remained appropriate; namely, in the absence of any apparent problems caused by inadequate training, and with clear incentives to train its staff well, there is no need to dictate to SCML precisely how its staff should be trained.
33. In reaching this decision, the Commission noted that other submitters were not opposed to SCML's proposals; rather they sought some assurance that the amendments would be worthwhile. SCML reiterated its confidence that its proposal was the best for the Hamilton, Queenstown and Wharf casinos. The Commission accepted its submission for the reasons given above, and expects to be advised if any signs of inadequate training emerge in practice.

#### **Other amendments to the HRPs**

34. In addition to the abovementioned (major) issues, the submission process (and the Commission's own analysis) identified a number of other minor matters to consider, as follows:

- (a) exclusion;
- (b) safe gambling environment – cheque retention;
- (c) standard of dress and behaviour;
- (d) display of signage and provision of gaming information to customers;
- (e) environmental design; and
- (f) employee gambling-related harm.

#### *Exclusion*

35. Section 2.1.1 of the HRP for the Queenstown casinos requires staff to “take the customer to the cash desk prior to conducting their exclusion to redeem any loyalty points.” The Secretary noted that this requirement does not exist in the other HRPs. In response, SCML submitted that this provision repeats an earlier provision in the HRP, so it deleted the redundant provision identified by the Secretary.
36. The Secretary also noted that there were differences between the proposed Hamilton and Queenstown HRPs under this sub-heading, including the absence of a requirement for SKYCITY Hamilton to inform the Host Responsibility Department in Auckland of excluded customers. The Secretary queried whether this inconsistency was intended. In response, SCML submitted that the inconsistency was unintended and that information on every excluded person is shared between all SKYCITY sites. Accordingly, it amended the Hamilton HRP to reflect this.
37. SCML’s response to the matters identified by the Secretary raised no issues of regulatory concern for the Commission. It approved those sections of the HRPs as amended accordingly.

#### *Cheque retention*

38. SCML proposed amendments to these sections of the HRPs in order to make them consistent with the current HRP for the Auckland casino. For example, SCML inserted specific paragraphs in relation to “safe gambling environment – cheque retention”, following similar paragraphs being inserted into the Auckland HRP.
39. The proposed amendments generated no contrary submissions, and did not raise any issues of regulatory concern for the Commission.

#### *Standards of dress and behaviour*

40. The Secretary questioned the rationale for the difference in dress standards between venues. For example, track pants appear to constitute suitable dress in the Queenstown casinos, while the prohibition on “offensive logos” is unique to those venues.

41. In response, SCML submitted that all of its sites require patrons to have a tidy standard of dress to enter, and although there are some differences in the specific dress requirements for its four sites, it does not see a need for complete uniformity.
42. The Commission noted the submissions on this point, but saw no compelling reason to amend the HRPs from that proposed by SCML (noting that all casinos require patrons to have a good standard of dress to enter the casinos). The Commission made a minor amendment in relation to the use of sunglasses for Texas Hold'em Poker at the Hamilton casino.

*Display of signage and provision of gambling information to customers*

43. SCML inserted two paragraphs in this section of the HRPs relating to the "Display of game rules, odds of winning and information on problem gambling for Fun Play tables" and the "Display of host responsibility information in open areas where there are gaming tables." Lifeline submitted that it was pleased to see these provisions included, while the Secretary noted that the second paragraph of the Queenstown/Wharf HRP appeared to contain a minor error.
44. The Commission was of the view that the inclusion of the additional paragraphs was desirable, and provided consistency with the approach adopted at the Auckland casino. SCML acknowledged the error identified, and the HRPs were amended accordingly.

*Environmental design*

45. SCML submitted that it included the words "where possible" to the "Requirements" section of this part of the Queenstown/Wharf HRP. That is, the section now provides that "SKYCITY shall in its environmental design seek to ensure ... where possible machine alleys with no exit points [are avoided]." SCML submitted that it added these words because the Wharf casino has some no exit alleys due to the very small size of the property. The Secretary concurred.
46. The Commission was of the view that the proposed amendment was appropriate, given the size of the Wharf casino. The existence of no exit alleys at this site would be unlikely to cause any additional host responsibility issues because casino staff can easily oversee patrons at this small casino.
47. The Commission made a small amendment to the bullet point to rectify a minor error.

*Employee gambling-related harm*

48. The Secretary noted that this section of the Queenstown/Wharf HRP (under "Information Resources") did not contain a fourth bullet point requirement which appears in the Auckland and Hamilton documents. That is, it did not make provision to:

Promote information about personal problem gambling support services when staff participate in an employee assistance programme, employee financial assistance, and/or where appropriate where a staff member may be seeking assistance.

49. The Secretary suggested that this should be included for consistency. In response, SCML submitted that it would do so.
50. The insertion of the omitted bullet point raised no issues of regulatory concern for the Commission.

**Other**

51. In reviewing the HRPs (and PGIP) proposed by SCML, the Commission made a number of minor amendments to improve the overall readability of the documents and to make them more consistent with the Auckland documents (where there was no compelling reason for inconsistency to exist).

**Conclusion**

52. The Commission specifies the HRPs attached to this decision for the Hamilton, Queenstown and Wharf casinos (including the Problem Gambler Identification Policy annexed to and forming part of the HRPs). These documents shall take effect from **8 September 2014**, replacing the HRPs dated 1 June 2012 for the Hamilton and Queenstown casinos, and 10 October 2012 for the Wharf casino.

Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

22 August 2014

**SKYCITY Hamilton**

**Host Responsibility  
Programme**

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***Appendix A – Current Host Responsibility Resources for Customers***

***Appendix B - Identification Policy***

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## 1.0 Introduction

### Approval

Effective date: 8 September 2014

Manager:

\_\_\_\_\_  
Peter Treacy  
General Counsel

\_\_\_\_\_  
Michelle Baillee  
General Manager SKYCITY Hamilton

## **1.1 Statement of position**

### **Statement of position**

SKYCITY is committed to providing a fun and safe environment for all customers and staff.

SKYCITY recognises that alcohol and gambling can be associated with harm for some of its customers. SKYCITY takes its role as a responsible host seriously and recognises that it has an important role to play in preventing and minimising alcohol and gambling-related harm for its customers and staff.

SKYCITY Hamilton intends this Programme to be a usable document for all staff which clearly sets out its obligations with respect to harm minimisation and prevention.

### **Compliance with legal obligations**

The Programme has been developed by SKYCITY and addresses the host responsibility conditions in the Casino Operator's Licence held by SKYCITY Casino Management Limited that relate to the Hamilton property.

Standard Operating Procedures (SOPs) developed by SKYCITY shall be consistent with and impose no lesser obligations than provided in the Gambling Act 2003 (Act), regulations, licence conditions or this Programme.

### **SKYCITY Code of Business Practice**

The Programme contributes to SKYCITY Hamilton's compliance with the SKYCITY Code of Business Practice.

## 1.2 Programme objectives

### Objectives

The principal objectives of the SKYCITY Hamilton Host Responsibility Programme include:

- 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; and
- Facilitating responsible gambling.

SKYCITY Hamilton aims to fulfil these objectives by:

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

### Outcomes

SKYCITY intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol-related harm to those customers who may be at risk. Reporting requirements relating to achievement of Programme objectives are set out in section 3.

## 2.0 Harm minimisation and prevention components

### Introduction

SKYCITY will focus on addressing underlying causes of gambling and alcohol-related harm as well as taking steps to minimise harm. Harm prevention and minimisation initiatives will be undertaken in the following areas:

- Policies and procedures;
- Host responsibility information for customers;
- Employee gambling-related harm;
- Stakeholder engagement;
- Environmental design;
- Provision of safe gambling environments;
- Marketing practices;
- Display of signage and provision of gaming information to customers;
- Learning and development;
- Identification of problem gamblers; and
- Gambling limitation.

The Programme's requirements for each area are outlined below.

### Roles and responsibilities

The Host Responsibility function at SKYCITY Hamilton is managed by the Security, Surveillance & Host Responsibility Manager. This role is responsible for the ongoing monitoring and management of GOI (Gambler of Interest) files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff. Recording, collating and analysing all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers is managed by the Security, Surveillance & Host Responsibility Manager.

References in SKYCITY Hamilton's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility", "Host Responsibility staff" and "the Host Responsibility team" denote the function managed by the Security, Surveillance & Host Responsibility Manager.

## 2.1 Policies and procedures

### **Policies and procedures**

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of the SKYCITY Hamilton Host Responsibility Programme. The policies and procedures are consistent with the Act, regulations, licence conditions and this Programme, and will be updated to reflect changes.

### **Policies:**

- Problem Gambler Identification Policy

### **Standard operating procedures:**

The following SOPs relate to harm prevention and minimisation activities. An overview of how these procedures are put into practice is shown below.

- Exclusion;
- Unattended Children;
- Underage Persons;
- Responsible Service of Alcohol; and
- Undesirable Behaviour

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation; and
- Analysis and Intervention.

## 2.1.1 Exclusion

### Introduction

SKYCITY offers two types of exclusions:

- Self Exclusion; and
- SKYCITY Exclusion.

SKYCITY Hamilton provides the facility for Self Exclusion of customers from the gaming areas of all SKYCITY sites for periods of three months, six months, nine months, one year, or two years and until they meet re-entry conditions. A customer may request and undertake Self Exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler or where the customer chooses to prevent or limit opportunities for harm to occur. The Self Exclusion process may also be initiated by problem gambling treatment providers or other venues where there are multi-venue exclusion arrangements in place.

SKYCITY Exclusion is for a period of two years and the customer must also meet re-entry conditions.

SKYCITY Exclusion is undertaken where a problem gambler does not take up Self Exclusion, and SKYCITY determines that the customer or his or her family or wider community is or may be experiencing harm as a consequence of that person's gambling behaviour. SKYCITY imposes exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally made on the basis of assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of a Self Exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. SKYCITY may also impose exclusion after a serious one-off incident where an offer of Self Exclusion has been refused.

Conditions for re-entry are contained in the Exclusion SOP.

### Approaches to customers

Only appropriately trained staff may undertake exclusions with customers. This is generally Host Responsibility, Security or Gaming Shift Managers.

### **Features of the exclusion process**

To ensure the effectiveness of the exclusion process, the following are features of the process:

#### **Communication**

- Provides a translation service where necessary;
- Provides support to excluded customers through provision of materials from problem gambling counselling service providers and contact details; and
- For Self Exclusion, provides Questions and Answers in appropriate languages.

#### **Third parties and service providers**

- Emphasises culturally appropriate processes and, wherever possible and appropriate, encourages families and/or friends to accompany the customer;
- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the excluded customer and during any discussion relating to re-exclusion or re-entry;
- Encourages the excluded customer to nominate a counselling service; and
- Arranges for the counselling service to call the excluded customer, if the excluded customer agrees.

#### **Other measures**

- Provides an updated database that is accessible to Security and Gaming staff to ensure detection of customers breaching an exclusion order;
- Promotes ongoing dialogue with counselling service providers to continually improve the exclusion process;
- Provides the customer with an opportunity to immediately redeem all redeemable loyalty points for rewards and suspends sending all loyalty information to the customers;
- Requires timely action from staff if a customer approaches requesting Self Exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone; and
- Provides opportunities for off-site Self Exclusion procedures, e.g. Self Exclusion forms are held by problem gambling service providers and can be completed at home.

#### **Breaches**

SKYCITY staff are required to be vigilant for any excluded customer who attempts to re-enter gaming areas. SKYCITY Hamilton Security and Gaming staff enforce the exclusion process and take action against those detected committing a breach of the exclusion process. Customers discovered attempting to do so may face a fine and/or prosecution. The Department of Internal Affairs is notified of all breaches by excluded customers.

The SKYCITY Hamilton Host Responsibility team regularly reviews the exclusion process and when necessary, makes improvements, in alignment with Group policy. The reviews may involve seeking customer and staff feedback through informal research processes.

#### **Loyalty card holders**

SKYCITY Hamilton must remove from its loyalty programme all excluded and trespassed customers and customers formally requested to leave the premises.

The SKYCITY Hamilton staff member responsible for the administration of the exclusion and trespass records must:

- Advise Host Responsibility within 24 hours of a loyalty programme cardholder being excluded, trespassed or formally requested to leave the premises, to ensure their account is deactivated; and

- Forward any surrendered loyalty card(s) to the loyalty station.

Host Responsibility must:

- Deactivate Excluded cardholders' accounts;
- Deactivate the accounts of cardholders who have been excluded, trespassed or formally requested to leave the premises;
- Send a list of loyalty member customers who have been excluded to the Host Responsibility Department in Auckland.; and
- Deactivate from mailing lists, cardholders who are excluded, trespassed, or formally requested to leave the premises.

Loyalty cards which are deactivated are not required to be returned by the customer to SKYCITY. Should a customer attempt to use his/her deactivated card, an error message will appear, asking the customer to present his/her card to a SKYCITY staff member. Having confirmed that the customer has been excluded, trespassed or formally requested to leave, the SKYCITY staff member will contact Security and appropriate action will be taken in relation to that customer.

## 2.1.2 Responsible service of alcohol

### Background

The SKYCITY Hamilton Responsible Service of Alcohol Programme is designed to ensure that customers enjoy an environment that is safe and enjoyable. A key component is the SKYCITY Hamilton Responsible Service of Alcohol training programme, which is designed for all staff who work in areas where alcohol is served, to promote effective team work to ensure customers' safety and enjoyment.

SKYCITY's Responsible Service of Alcohol Programme is guided by the six key principles of host responsibility (Alcohol Advisory Council of New Zealand, 2005) in licensed premises. A responsible host:

- Prevents intoxication;
- Does not serve alcohol to minors;
- Provides and actively promotes non-alcoholic alternatives;
- Provides and actively promotes substantial food;
- Serves alcohol responsibly or not at all; and
- Promotes safe transport options.

### Approach

The following is the SKYCITY Hamilton programme regarding the responsible service of alcohol:

- SKYCITY Hamilton will provide the sale of alcoholic beverages in a responsible manner, including monitoring and controlling of alcohol consumption;
- SKYCITY Hamilton will ensure that it observes the provisions of the Sale and Supply of Liquor Act 2012 (the "**Liquor Act**") relating to the permitted hours within which customers can be sold and supplied alcohol and customers and staff are permitted on licensed premises;
- SKYCITY Hamilton will maintain an effective responsible service of alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol which must be completed prior to serving alcohol;
- All SKYCITY Hamilton employees, temporary and contract staff will receive training on the Responsible Service of Alcohol during their induction as part of the Host Responsibility Level 1 training programme, including recognition of excessive alcohol consumption traits;
- SKYCITY Hamilton will ensure intoxicated customers are prevented from entering the premises;
- Any customer who appears under the age of 25 may be asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, that customer will not be served or supplied with any alcohol;
- Staff will tactfully intervene to prevent possible problems arising from excessive alcohol consumption including, where possible, enlisting the services of staff of similar social/ethnic background to the customer;
- No customer who appears intoxicated will be served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another;
- At all times, when liquor is being sold or supplied to members of the public, there is a manager or managers on duty who hold current Manager's Certificates under the Liquor Act;
- Customers may not bring alcoholic beverages onto the premises where beverage service is provided, unless prior approval has been given;

- SKYCITY Hamilton will ensure that a reasonable range of non-alcoholic drinks is available at reasonable prices;
- SKYCITY will ensure that a reasonable range of low-alcoholic drinks (being less than 2.5% ethanol by volume at 20 degrees Celsius) is available;
- SKYCITY will ensure that a reasonable range of food is available at all times in portions suitable for a single customer, at reasonable prices, and within a reasonable time of being ordered;
- SKYCITY will readily provide free, comprehensive and accurate information to customers about the forms of transport available from the premises; and
- Free water will always be available to customers.

### **2.1.3 Unattended children**

#### **Background**

SKYCITY management does not allow children to be left unattended on any part of its premises.

#### **Approach**

SKYCITY Hamilton takes active steps to prevent children being without adult supervision.

Employees must report to Security any incident where it is apparent that a child has been left unattended.

Security Officers must intervene and take all practicable steps to locate an adult responsible for an unattended child.

Security must contact the Police and trespass the customer in every case where there is an absence of a reasonable explanation for the child being left unattended.

In all instances of unattended children, the Host Responsibility team must be notified as soon as practicable to follow up potential problem gambling issues.

Security Officers must patrol the SKYCITY Hamilton car parks and environs to detect any unattended children in vehicles.

## 2.1.4 Underage persons

### **Background**

SKYCITY is committed to keeping minors out of the gambling area. SKYCITY will rigorously enforce the prevention of underage gambling in its casinos.

### **Approach**

SKYCITY Hamilton must take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gambling facilities (currently 20 and over).

Any customer who appears under the age of 25 is asked for verification of identity and proof of age before being permitted to enter the gambling area.

SKYCITY Hamilton must take all reasonable steps to restrict access to 'supervised areas' only to those persons legally permitted by age to enter the area (currently 18 and over), unless accompanied by a parent or guardian.

Training for SKYCITY Hamilton Security and Gaming staff must include the need to be particularly vigilant for the presence of underage persons.

Any SKYCITY Hamilton staff member has the authority to approach suspected underage persons and seek identification for proof of age.

## 2.1.5 Standards of dress and behaviour

### **Background**

SKYCITY Hamilton must provide a comfortable environment where customers are able to enjoy their surroundings without disruption from others who are inappropriately dressed or behaving in an unacceptable manner.

### **Dress code**

SKYCITY Hamilton requires a neat and tidy standard of dress. While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at SKYCITY Hamilton's casino:

- torn clothes;
- gang patches or other insignias;
- track pants;
- dirty clothes or footwear; or
- hats, caps or sunglasses (unless for religious or medical reasons or for Texas Hold'em Poker).

### **Behavioural standards**

If a customer is detected:

- under the influence of alcohol;
- abusing or threatening staff or other customers;
- causing conflict with other customers or staff, or
- otherwise being unpleasant,

then SKYCITY Hamilton staff must:

- take appropriate steps to stop the behaviour, or
- in appropriate circumstances, have the customer escorted from the premises.

Customers exhibiting undesirable behaviour may be trespassed or excluded.

## **2.1.6 Gambling limitation**

SKYCITY offers customers a voluntary Pre-Commitment system.

This system is available to all casino patrons and allows customers to voluntarily set limits on how much they spend and how long they play for on gaming machines.

Breaches of pre-commitment limits and multiple increases or disabling of pre-commitment limits are new general indicators.

Host responsibility staff will proactively encourage the use of this system, where appropriate, during interactions with patrons.

## 2.2 Host responsibility information for customers

### Customer information resources

SKYCITY produces a range of host responsibility information resources for customers. Copies of all SKYCITY brochures and other host responsibility information resources are available and displayed where appropriate in SKYCITY Hamilton's gambling areas.

This information is also supplemented and supported by the SKYCITY Hamilton website ([www.skycityhamilton.co.nz](http://www.skycityhamilton.co.nz)) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is also available on the SKYCITY Hamilton website.

There is an ongoing process of review and development of resources for customers.

Information resources are translated into a variety of languages consistent with the cultural make-up of SKYCITY Hamilton's customer base.

A summary of SKYCITY Hamilton's host responsibility resources for customers is shown in Appendix A.

## 2.3 Employee gambling-related harm

### Introduction

SKYCITY is committed to developing an internal culture that proactively supports and promotes host responsibility.

### Background

SKYCITY undertakes a range of measures concerning the potential for employee gambling-related harm that aim to:

- Prevent and minimise gambling-related harm amongst SKYCITY employees as a result of their own or someone else's gambling;
- Enhance the ability of SKYCITY staff to undertake effective host responsibility; and
- Contribute to the prevention and minimisation of gambling-related harm in the community.

These measures are intended to address the operator licence condition:

'24(f) assistance to casino employees with managing the potential for personal problem gambling.'

### Requirements

SKYCITY Hamilton recognises that employee gambling-related harm is a sensitive issue. Accordingly, measures to promote awareness and encourage and support help-seeking will be discreet and interventions with SKYCITY staff kept confidential.

SKYCITY Hamilton will undertake the following to provide assistance to casino employees with managing the potential for personal problem gambling:

### Information resources

- Develop supporting resources for staff that will be made available when required using appropriate channels, including:
  - a standardised gambling screen; and
  - self-help resources to assist with early self-identification and intervention;
- Include information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in host responsibility training programmes and in the Workplace Support (employee assistance) programme;
- Promote awareness about self-assessment and self-help resources, and encourage staff to use these resources themselves to assist with early identification and intervention; and
- Promote information about personal problem gambling support services when staff participate in the Employee Assistance Programme, Employee Financial Assistance, and/or where appropriate where a staff member may be seeking assistance.

### Policies and procedures

- Prohibit staff from gambling at any SKYCITY owned or operated casino;
- Prohibit access to online gambling sites by staff while on SKYCITY premises, unless such access is required for genuine business reasons; and
- Identify high risk areas for staff and target with increased levels of information.

### Recruitment

- Assess all job applicants for evidence of problem gambling (via questions in job application forms);

- Decline applications from those who are identified as problem gamblers either through their screening results, or disclosure of relevant indicators (as set out in the SKYCITY Identification Policy) during the recruitment process and provide appropriate information, advice and assistance; and
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Hamilton Host Responsibility Programme.

#### **Support for staff**

- Provide assistance to staff who are experiencing gambling-related harm, including:
  - Identification;
  - Intervention;
  - Referral to confidential support through the Workplace Support Programme and/or a problem gambling treatment provider;
  - Confidentiality; and
  - Wherever possible, SKYCITY Hamilton will involve problem gambling counsellors in staff induction training about the signs of problem gambling among staff and customers.

#### **Engagement**

- Work with class 4 organisations to maximise the effectiveness of their Host Responsibility Programmes.

## 2.4 Stakeholder engagement

### Background

SKYCITY Hamilton aims to maintain constructive relationships with members of the local community.

### Approach

SKYCITY Hamilton will continue to facilitate opportunities for regular engagement to ensure local stakeholders:

- Understand and are aware of SKYCITY Hamilton's Host Responsibility Programme;
- Are able to continue to raise and discuss operational issues in relation to host responsibility;
- Continue to have opportunities to provide input into SKYCITY Hamilton's Host Responsibility Programme and harm prevention and minimisation initiatives; and
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

SKYCITY Hamilton convenes a bi-annual Host Responsibility Community Liaison Group to discuss host responsibility issues. These issues primarily relate to operational processes, eg referrals and exclusions, etc. There are also opportunities to discuss strategic or broader sector issues.

SKYCITY will invite representatives from:

- Treatment service providers including problem gambling and alcohol and other drugs;
- Public health providers; and
- Government agencies including the Police, Department of Internal Affairs and Alcohol Advisory Council of New Zealand.

In developing and implementing its Programme, and harm prevention and minimisation initiatives, SKYCITY will consider the views expressed by members of the Liaison Group.

SKYCITY will make available to the Liaison Group a copy of the report provided to the Commission under section 3 of this Programme.

SKYCITY also arranges site visits, including presentations, for representatives to become familiar with the SKYCITY Hamilton Host Responsibility Programme. SKYCITY also undertakes off-site visits to stakeholder organisations.

## 2.5 Environmental design

### Approach

SKYCITY's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol.

### Considerations

In considering the impact of any proposed changes, the key objectives are to ensure that environmental features:

- Contribute to harm prevention or have a neutral impact on harm;
- Encourage responsible gambling and alcohol consumption choices;
- Do not contribute to the onset of harm or exacerbate risk; and
- Facilitate effective host responsibility, particularly early identification and intervention.

This approach applies to the following SKYCITY areas:

- Floor lay-out, furnishing and design;
- Casino electronic gaming machine and table game location;
- Access to cash;
- Game and equipment features;
- Environments adjacent to the gaming floor, including access to other entertainment options;
- Physical location and presence of Security and Host Responsibility;
- Location of information resources; and
- Access criteria, including dress codes and age restrictions.

### Requirements

SKYCITY shall in its environmental design seek to ensure:

- Problem/responsible gambling signage and exit points are clearly visible;
- Patrons are visible to venue staff on the gaming floor;
- Machine alleys with no exit point and in dimly lit corners are avoided;
- Gambling areas are well lit, utilising natural light where appropriate;
- Clocks are visible in the gambling areas; and
- Other non-gambling entertainment options are available.

### Other regulatory processes

All applications for construction or design changes to gambling areas must be approved by the Gambling Commission. As part of any such application, SKYCITY assesses any impacts the alterations may have on harm prevention and harm minimisation. The impact of any proposed design change on gambling harm is assessed in determining the suitability of any such proposal prior to making applications to the Commission.

## **2.6 Safe gambling environment – gaming machine play**

### **Requirements**

SKYCITY will take all reasonable and practicable steps to ensure a customer plays no more than one gaming machine at a time.

### **2.6.1 Safe gambling environment – third party loans for financial gain**

#### **Legislation**

Under section 15(1) of the Act, SKYCITY is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the former Casino Control Authority (CCA) or the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided by SKYCITY at the Hamilton casino.

#### **Policy**

SKYCITY does not permit loan transactions by third parties for financial gain at the casino venue, except as approved by the CCA or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or “loan sharking” as it is known.

#### **Requirements**

- SKYCITY will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- SKYCITY will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process SKYCITY will maintain an Undesirable Behaviour Standard Operating Procedure which shall explain how SKYCITY will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, SKYCITY will investigate and act in a timely manner. This process is outlined in the SKYCITY Hamilton Undesirable Behaviour Standard Operating Procedure.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, SKYCITY will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, SKYCITY may issue that customer with a requirement to leave the premises, pending further investigation. At the completion of its investigation, and where a person is found to be offering loans for financial gain, SKYCITY will issue that person with a trespass notice.
- SKYCITY will notify Department of Internal Affairs Gambling Inspectors of suspected loan sharking activity in accordance with Minimum Operating Standards (MOS) for Records and Notification. Where appropriate, SKYCITY will also notify relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e. not the casino), SKYCITY will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.

- Depending on the outcome of the GOI investigation, the customer may be issued with a SKYCITY Exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- SKYCITY will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

## **2.6.2 Safe gambling environment – cheque retention**

### **Policy**

SKYCITY will when accepting cheques which it will hold unbanked by arrangement with a customer report this to Host Responsibility.

### **Requirements**

Host Responsibility staff will monitor and record the activities of any customer whose cheque it is holding unbanked by arrangement for indicators of potential gambling harm.

## 2.7 Responsible marketing

### Legislation and industry codes

SKYCITY's marketing activities comply with applicable laws, Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004, relevant industry codes (including the New Zealand Advertising Standards Authority "Code for Advertising Gaming and Gambling") and licence conditions.

### Requirements

SKYCITY Hamilton will not pursue marketing initiatives which have any of the characteristics set out below. Where concerns are raised by third parties, SKYCITY will investigate and, where appropriate, take immediate action to withdraw or amend the marketing initiative.

SKYCITY Hamilton will ensure an internal process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of SKYCITY's loyalty programme.

This process includes consultation with Host Responsibility as well as the Regulatory team, with final sign-off by Legal (both of which are based at SKYCITY Auckland).

Consultation includes consideration of the following principles.

Does the marketing initiative:

- Target groups at increased risk of experiencing gambling harm?
- Target minors, portray minors participating in gambling activities, or advertise gambling on radio/television at times when minors are more likely to be exposed?
- Encourage or reinforce gambling behaviour(s) that may be associated with harm, including:
  - encourage customers to participate beyond their limits of time or money?
  - discourage customers from taking breaks?
  - promote gambling as a means of relieving financial or personal difficulties?
  - state or imply that gambling is a means of winning or paying for household staples, education or housing commitments?
  - promote excessive alcohol consumption or associate gambling with excessive alcohol consumption?
- Present gambling in an unrealistic, misleading, or deceptive way, including:
  - exaggerating the chances of winning or the size of the prize, including a promise of winning?
  - stating or implying that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game?
  - exploiting superstitions or concepts of luck?

## **2.8 Display of signage and provision of gaming information to customers**

### **Background**

A key component of the Programme is the provision of information for customers. Provision of information is intended to assist customers to make informed decisions about their gambling and alcohol consumption while at SKYCITY.

A description of how SKYCITY will discharge its obligations to offer information and advice to persons identified as problem gamblers is addressed in the Problem Gambler Identification Policy and the SOPs.

### **Approach**

SKYCITY has a range of information resources that are provided to customers, summarised in Appendix A.

### **Display of signs, brochures, clocks and website**

SKYCITY ensures that:

- Host responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of SKYCITY Hamilton's visitors;
- Brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations;
- All gaming machines and gaming tables at SKYCITY display problem Gambling Helpline telephone numbers, with information in a range of languages. The information is also displayed on or near all ATMs and public phones;
- Clocks are on display in all SKYCITY gambling areas; and
- Call Centre facilities include a direct line to the Gambling Helpline.

SKYCITY Hamilton will make available a 'responsible gaming' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are, that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

SKYCITY actively promotes the Gambling Helpline and other free problem gambling counselling service contact details through its host responsibility resources. Customers demonstrating potentially harmful behaviour are encouraged to contact these services. All excluded customers, and third parties who contact SKYCITY about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

SKYCITY Entertainment Group Limited has a host responsibility section on its website.

### **Display of game rules, permissible bets and payment of winning bets for table games**

Information is made available to customers that pertain to game rules, permissible bets and payment of winning bets as required by section 175 of the Act.

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies minimum and maximum bets, and payments of winning bets. Signage is also displayed stating that staff cannot accept tips.

**Display of game rules, permissible bets and payment of winning bets for electronic gaming machines**

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the "Responsible Gaming" brochure, which is available on the gaming floor.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, an appropriate gaming employee will explain this and can provide a "How to Play" brochure.

**Display of game rules, odds of winning and information on problem gambling for Fun Play Tables**

Information is made available to customers that pertains to game rules, odds of winning and information on problem gambling.

Whenever a Fun Play table is open, information is displayed which advises customers that the game rules for the game are available upon request, and odds of winning and information on problem gambling.

**Display of host responsibility information in open areas where there are gaming machines**

Information on problem gambling and responsible gambling are displayed and made available to customers in open areas (e.g. decks) where gaming machines are present.

**Information requests by customers**

Customers wishing to seek further clarification of game rules will be given access to the relevant approved rules.

**Information on gambling activity**

Patrons (both loyalty and non-loyalty) can be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

## 2.9 Learning and development

### Introduction

SKYCITY Hamilton is committed to developing staff awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. SKYCITY Hamilton shall comply with its statutory obligations relating to problem gambling awareness training, including as set out in Regulation 12 of the Gambling (Harm Prevention and Minimisation) Regulations 2004.

SKYCITY Hamilton will aim to ensure its learning and development initiatives are appropriate to the needs of its customers and staff.

SKYCITY's learning and development resources approach employs established models of best-practice and include a training mix of classroom based, multi-media and on-the-job coaching. Learning and development resources are tailored depending on the roles and responsibilities of staff, and their required host responsibility customer interactions.

### Overview of staff roles

**Staff:** All staff, regardless of position, are trained to identify indicators of harm. Staff are expected to refer the observation of indicators to a supervisor/manager.

**Frontline staff:** All staff who have contact with gambling customers in the casino are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Frontline staff have a primary role in being alert to and identifying indicators of harm, and will report observations of concern to a supervisor/manager. While it is not their primary role, frontline staff are trained and will approach customers themselves in circumstances, for example, where a matter is urgent or a manager/supervisor is not available.

**Supervisor or manager:** The supervisor/manager is the first point of contact for escalation for indicators of harm. Depending on the circumstances, the supervisor/manager delivers interventions by providing information, advice and assistance to customers and taking other appropriate action(s) to minimise harm.

Supervisors and managers are also responsible for ensuring that all observations of indicators reported to them by staff, and follow up responses taken by staff and/or supervisors and managers, are logged and sent to Host Responsibility. Supervisors and managers are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

**Host Responsibility:** Host Responsibility record, collate and analyse all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers. They also record interactions and interventions they undertake themselves. The information is used to undertake a section 309 assessment. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken by frontline staff, managers or supervisors or by Host Responsibility staff. This may include meeting with customers. Host Responsibility staff are responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff.

## **Learning and development requirements**

### **Induction training (Level 1)**

All permanent staff, whether or not in direct contact with customers, must participate in two hours of face-to-face training within a reasonable timeframe of commencement (approximately two months). This training includes:

- Responsible service of gambling and alcohol;
- Identification of problem gamblers;
- Reporting and recording procedures for observations;
- Approaching and providing information about problem gambling to players; and
- Awareness of employee gambling-related harm.

For all staff in direct contact with customers, SKYCITY will work to supplement this classroom-based training with on-the-job coaching and support.

Level 1 refresher training will occur at least once a year as noted below.

### **Training for supervisors (Level 2)**

Supervisors from Gaming, Food & Beverage, and Security & Surveillance must participate in supplementary Level 2 training. This training is an e-learning module and is to be undertaken within three months of commencement or promotion to a supervisor position. The training includes information on:

- Identification of problem gamblers;
- Overview of the legal framework and Host Responsibility Programme;
- Initial action with respect to customers requesting problem gambling assistance;
- Identification and intervention with respect to excessive alcohol consumption;
- Support of staff who have intervened and debrief; and
- Importance of reporting.

### **Advanced training (Level 3)**

Advanced training, supplementary to induction training, is provided for selected senior employees who may be expected to deliver interventions to customers. This includes managers working in Gaming and Security & Surveillance.

This training includes both theoretical and practical components and can be completed in modules using a range of learning techniques suitable to the SKYCITY Hamilton environment. Topics include:

- SKYCITY's legal and regulatory requirements;
- Identification of problem gamblers;
- Intervention, including brief interventions, de-escalation and motivational interviewing;
- Debriefing and staff support;
- Problem gambling treatment processes;
- Cultural awareness;
- Advanced Responsible Service of Alcohol – intervention and slowing service; and
- Awareness of employee gambling-related harm;

### **Refresher training**

Level 1 refresher training will be delivered annually and be available to all staff. An assessment of areas of focus is to be made beforehand by Host Responsibility staff and managers, and discussed with Host Responsibility training staff. Recall testing will be included in this regular refresher training.

Additional refresher training can be provided when a learning and development need is identified or requested.

### **General Manager training – Sale of Liquor Act**

The Licence Controller Qualification, as required by the Sale of Liquor Act, is facilitated through an external provider.

### **Suicide-awareness Training**

Host Responsibility staff and senior Security Managers are trained to respond to customers who are at risk of suicide. This training is facilitated through an external provider.

### **Informal learning and development**

As learning and development is an ongoing process, SKYCITY provides a range of other opportunities for host responsibility learning to occur. There is an emphasis on sharing information and experiences across SKYCITY's portfolio to build host responsibility knowledge. These internal opportunities include:

- Internal communications, e.g. staff newsletters;
- Inclusion in business or management processes, e.g. staff meetings and key performance indicators;
- Discussion forums led by Host Responsibility staff; and
- Participation by staff in the harm minimisation and host responsibility policy development process.

### **Evaluation**

SKYCITY undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement. These measures include:

- Staff training feedback and evaluation forms;
- Staff knowledge recall and application of knowledge;
- Staff focus groups; and
- Analysis of training needs.

## **2.10 Identification of problem gamblers**

A copy of SKYCITY's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme. The policy fulfils SKYCITY's obligations under the following sections of the Act.

Section 308 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must have a policy for identifying problem gamblers, which includes:

- an acceptable definition of problem gambling;
- indicators of problem gambling in the casino; and
- the steps to be taken in identifying actual or potential problem gamblers.

This policy must be made available upon request. SKYCITY must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

Section 309 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) The self-exclusion procedure available; and
- (b) Any procedures described by Regulations made under the Act.

## 3.0 Monitoring and reporting

### Introduction

SKYCITY will evaluate its performance against the objectives of the Programme.

The Hamilton Host Responsibility Programme is measured and monitored using a range of indicators that are set out below. These indicators reflect the level of activity under the Programme, compliance with legal obligations, and progress against all the Programme objectives as set out in section 1.

As the Programme is implemented and embedded into the business, and any initiatives are developed, SKYCITY Hamilton may seek to amend this section of the Programme, prior to the Commission's next two-yearly review.

### Reports to the Gambling Commission

SKYCITY will report annually to the Commission on the implementation of the Programme.

Reports will include the following information:

- A description of the resources put into the core elements of the Programme;
- A description of activities undertaken by SKYCITY under the Programme;
- Reporting against the measures specified below, including a comparison to previous data where applicable;
- SKYCITY discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the Department of Internal Affairs and other meetings held as required; and
- Proposed improvements to the Programme.

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
<ul style="list-style-type: none"> <li>Number of customers about whom there have been observations.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of observed indicators reported to Host Responsibility.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of approaches to SKYCITY by third parties.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>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.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of GOI files by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> <li>Preferred mode of gambling.</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of approaches to customers to offer information about self-exclusion.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of exclusions (both casino and self-exclusions) by: <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/SKYCITY)</li> <li>Following re-entry.</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in Multi-site Exclusions.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of excluded customers (both casino and self-exclusions) agreeing to be contacted by help services on exclusion form.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of breaches of exclusion (both casino and self-exclusions) by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of exclusions by length: <ul style="list-style-type: none"> <li>3 months</li> <li>6 months</li> <li>9 months</li> <li>12 months</li> <li>24 months</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of successful and unsuccessful applications to re-enter following exclusion.</li> </ul>	SKYCITY	Annual

<ul style="list-style-type: none"> <li>The extent to which customers have been assisted (drawing, <i>inter alia</i>, on feedback from customers and staff).</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of persons trespassed or required to leave for making loans for financial gain.</li> </ul>	SKYCITY	Annual
<b>Measures relating to Responsible Consumption of Alcohol</b>		
<ul style="list-style-type: none"> <li>Number of "Under the Influence" (UTI) incidents (internal report).</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of Police contacts citing SKYCITY as venue where their last drink was served.</li> </ul>	Police Alcolink database	Annual
<b>Measures relating to Staff Training</b>		
<ul style="list-style-type: none"> <li>HR1 courses</li> <li>HR2 courses</li> <li>HR3 courses</li> <li>Refresher training</li> <li>Number of staff who need to be trained in each category, and proportion of those staff who have completed the appropriate level training.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures.</li> </ul>	L&D Evaluations Mystery Shopper	Annual Annual
<ul style="list-style-type: none"> <li>Staff perceptions of the effectiveness of training.</li> </ul>	L&D Evaluations	Annual
<ul style="list-style-type: none"> <li>Staff perceptions on the effectiveness of the Employee Gambling Harm Programme, reporting to the Commission to include percentage response rate of staff to the SKYCITY survey.</li> </ul>	SKYCITY commissioned survey	Annual
<b>Other Programme activity and compliance-related measures</b>		
<ul style="list-style-type: none"> <li>Number of internal and external underage incidents.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of unattended children.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of Requests to Leave the Premises (RTLPs).</li> </ul>	SKYCITY	Annual

## Appendix A – Current Host Responsibility Resources for Customers

**“Being A Responsible Host: Our Commitment To Our Customers”** – poster  
SKYCITY developed and displays the A3 “Being a Responsible Host” poster in key gaming areas. The customer-focused poster is designed to provide an overview of SKYCITY’s Host Responsibility Policy and the key initiatives undertaken.

**“Would you like a Helping Hand?”** – brochure  
SKYCITY provides “Would you like a Helping Hand” – brochures in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer. The brochure provides the Gambling Helpline information and signs and symptoms of problem gambling. It also outlines other free problem gambling counselling services.

**“Would you like a Helping Hand?”** – poster  
In supplementing the “Would you like a Helping Hand” – brochure, SKYCITY also produces an A1 poster version. The poster provides the Gambling Helpline number and is displayed in various places across gambling areas including some customer restrooms.

**“Would you like a Helping Hand?”** – wallet card  
This pocket size card also supplements the brochure and presents the Gambling Helpline number and other free problem gambling counselling service contact numbers. Available in Chinese, English, Tongan and Samoan.

**“Responsible gaming?”** – brochure  
This brochure provides responsible gambling tips and an overview of the odds of winning and player returns and highlights that casino games are based on chance and randomness. It also provides Gambling Helpline and SKYCITY Host Responsibility contact details. Available in Chinese and English.

**“Self-Exclusion at SKYCITY”** – brochure  
The brochure outlines the self-identified exclusion process. It provides simple information on frequently asked questions and shows Gambling Helpline and SKYCITY Host Responsibility contact details. The “Self-Exclusion at SKYCITY” brochure is available in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer.

**“Concerned About Someone’s Gambling? SKYCITY Can Help”** – brochure  
The brochure outlines the SKYCITY (third party) exclusion process. It provides simple information on frequently asked questions and shows Gambling Helpline and SKYCITY Host Responsibility contact details. The “Concerned About Someone’s Gambling? SKYCITY Can Help” brochure is available in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer.

**“Why We Can’t Serve You”** – tent card  
This card provides a summary of the SKYCITY Responsible Service of Alcohol Policy. The tent card is provided to all staff to show to customers when explaining decisions regarding service of alcohol, including the slowing or stopping of service.

**“Children at SKYCITY”** – brochure  
The brochure explains New Zealand law and SKYCITY’s policy with respect to unattended children. It is available in Chinese, English and Hindi.

**SKYCITY Queenstown and  
SKYCITY Wharf**

**Host Responsibility  
Programme**

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***Appendix A – Current Host Responsibility Resources for Customers***

***Appendix B - Identification Policy***

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# 1.0 Introduction

## Approval

Effective date: 8 September 2014

Manager:

\_\_\_\_\_  
Peter Treacy  
General Counsel

\_\_\_\_\_  
Richard Callander  
General Manager, SKYCITY Queenstown and SKYCITY Wharf

## **1.1 Statement of position**

### **Statement of position**

SKYCITY is committed to providing a fun and safe environment for all customers and staff.

SKYCITY recognises that alcohol and gambling can be associated with harm for some of its customers. SKYCITY takes its role as a responsible host seriously and recognises that it has an important role to play in preventing and minimising alcohol and gambling-related harm for its customers and staff.

SKYCITY Queenstown/Wharf intends this Programme to be a usable document for all staff which clearly sets out its obligations with respect to harm minimisation and prevention.

### **Compliance with legal obligations**

The Programme has been developed by SKYCITY and addresses the host responsibility conditions in the Casino Operator's Licence held by SKYCITY Casino Management Limited that relate to the Queenstown and Wharf properties.

Standard Operating Procedures (SOPs) developed by SKYCITY shall be consistent with and impose no lesser obligations than provided in the Gambling Act 2003 (Act), regulations, licence conditions or this Programme.

### **SKYCITY Code of Business Practice**

The Programme contributes to SKYCITY Queenstown/Wharf's compliance with the SKYCITY Code of Business Practice.

## 1.2 Programme objectives

### Objectives

The principal objectives of the SKYCITY Queenstown/Wharf Host Responsibility Programme include:

- 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; and
- Facilitating responsible gambling.

SKYCITY Queenstown/Wharf aims to fulfil these objectives by:

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

### Outcomes

SKYCITY intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol-related harm to those customers who may be at risk. Reporting requirements relating to achievement of Programme objectives are set out in section 3.

## 2.0 Harm minimisation and prevention components

### Introduction

SKYCITY will focus on addressing underlying causes of gambling and alcohol-related harm as well as taking steps to minimise harm. Harm prevention and minimisation initiatives will be undertaken in the following areas:

- Policies and procedures;
- Host responsibility information for customers;
- Employee gambling-related harm;
- Stakeholder engagement;
- Environmental design;
- Provision of safe gambling environments;
- Marketing practices;
- Display of signage and provision of gaming information to customers;
- Learning and development;
- Identification of problem gamblers; and
- Gambling limitation.

The Programme's requirements for each area are outlined below.

### Roles and responsibilities

The Host Responsibility function at the Queenstown and Wharf casinos is managed by the Security, Surveillance and Host Responsibility Manager. This role is responsible for the ongoing monitoring and management of Gambler of Interest (GOI) files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff. Recording, collating and analysing all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers is managed by the Security, Surveillance and Host Responsibility Manager.

References in SKYCITY Queenstown/Wharf's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility", "Host Responsibility staff" and "the Host Responsibility team" denote the function managed by the Security, Surveillance and Host Responsibility Manager.

## 2.1 Policies and procedures

### **Policies and procedures**

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of the SKYCITY Queenstown/Wharf Host Responsibility Programme. The policies and procedures are consistent with the Act, regulations, licence conditions and this Programme, and will be updated to reflect changes.

### **Policies:**

- Problem Gambler Identification Policy

### **Standard operating procedures:**

The following SOPs relate to harm prevention and minimisation activities. An overview of how these procedures are put into practice is shown below.

- Exclusion;
- Unattended Children;
- Underage Persons;
- Responsible Service of Alcohol;
- Undesirable Behaviour; and
- Agreed Limitation.

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation; and
- Analysis and Intervention.

## 2.1.1 Exclusion

### Introduction

SKYCITY offers two types of exclusions:

- Self Exclusion; and
- SKYCITY Exclusion.

SKYCITY Queenstown/Wharf provides the facility for Self Exclusion of customers from the gaming areas of all SKYCITY sites for periods of three months, six months, nine months, one year, or two years and until they meet re-entry conditions. A customer may request and undertake Self Exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler or where the customer chooses to prevent or limit opportunities for harm to occur. The Self Exclusion process may also be initiated by problem gambling treatment providers or other venues where there are multi-venue exclusion arrangements in place.

SKYCITY Exclusion is for a period of two years and the customer must also meet re-entry conditions.

SKYCITY Exclusion is undertaken where a problem gambler does not take up Self Exclusion, and SKYCITY determines that the customer or his or her family or wider community is or may be experiencing harm as a consequence of that person's gambling behaviour. SKYCITY imposes exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally made on the basis of assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of a Self Exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. SKYCITY may also impose exclusion after a serious one-off incident where an offer of Self Exclusion has been refused.

Conditions for re-entry are contained in the Exclusion SOP.

### Approaches to customers

Only appropriately trained staff may undertake exclusions with customers. This is generally Host Responsibility, the Assistant Security and Surveillance Manager or the Security and Surveillance Operations Managers.

### **Features of the exclusion process**

To ensure the effectiveness of the exclusion process, the following are features of the process:

#### **Communication**

- Provides a translation service where necessary;
- Provides support to excluded customers through provision of materials from problem gambling counselling service providers and contact details; and
- For Self Exclusion, provides Questions and Answers in appropriate languages.

#### **Third parties and service providers**

- Emphasises culturally appropriate processes and, wherever possible and appropriate, encourages families and/or friends to accompany the customer;
- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the excluded customer and during any discussion relating to re-exclusion or re-entry;
- Encourages the excluded customer to nominate a counselling service; and
- Arranges for the counselling service to call the excluded customer, if the excluded customer agrees.

#### **Other measures**

- Provides an updated database that is accessible to Security and Gaming staff to ensure detection of customers breaching an exclusion order;
- Promotes ongoing dialogue with counselling service providers to continually improve the exclusion process;
- Provides the customer with an opportunity to immediately redeem all redeemable loyalty points for rewards and suspends sending all loyalty information to the customers;
- Requires timely action from staff if a customer approaches requesting Self Exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone; and
- Provides opportunities for off-site Self Exclusion procedures, e.g. Self Exclusion forms are held by problem gambling service providers and can be completed at home.

#### **Breaches**

SKYCITY staff are required to be vigilant for any excluded customer who attempts to re-enter gaming areas. SKYCITY Queenstown/Wharf Security and Gaming staff enforce the exclusion process and take action against those detected committing a breach of the exclusion process. Customers discovered attempting to do so may face a fine and/or prosecution. The Department of Internal Affairs is notified of all breaches by excluded customers.

The SKYCITY Queenstown/Wharf Host Responsibility team regularly reviews the exclusion process and when necessary, makes improvements, in alignment with Group policy. The reviews may involve seeking customer and staff feedback through informal research processes.

#### **Loyalty card holders**

SKYCITY Queenstown/Wharf must remove from its loyalty programme all excluded and trespassed customers and customers formally requested to leave the premises.

The SKYCITY Queenstown/Wharf staff member responsible for the administration of the exclusion and trespass records must:

- Advise Host Responsibility within 24 hours of a loyalty programme cardholder being excluded, trespassed or formally requested to leave the premises, to ensure their account is deactivated; and
- Forward any surrendered loyalty card(s) to the loyalty station.

Host Responsibility must:

- Deactivate Excluded cardholders' accounts;
- Deactivate the accounts of cardholders who have been excluded, trespassed or formally requested to leave the premises;
- Send a list of loyalty member customers who have been excluded to the Host Responsibility Department in Auckland; and
- Deactivate from mailing lists, cardholders who are excluded, trespassed, or formally requested to leave the premises.

Loyalty cards which are deactivated are not required to be returned by the customer to SKYCITY. Should a customer attempt to use his/her deactivated card, an error message will appear, asking the customer to present his/her card to a staff member. Having confirmed that the customer has been Excluded, Trespassed or formally requested to leave, the staff member will contact Security and appropriate action will be taken in relation to that customer.

## 2.1.2 Responsible service of alcohol

### Background

The SKYCITY Queenstown/Wharf Responsible Service of Alcohol Programme is designed to ensure that customers enjoy an environment that is safe and enjoyable. A key component is the SKYCITY Queenstown/Wharf Responsible Service of Alcohol training programme, which is designed for all staff who work in areas where alcohol is served, to promote effective team work to ensure customers' safety and enjoyment.

SKYCITY's Responsible Service of Alcohol Programme is guided by the six key principles of host responsibility (Alcohol Advisory Council of New Zealand, 2005) in licensed premises. A responsible host:

- Prevents intoxication;
- Does not serve alcohol to minors;
- Provides and actively promotes non-alcoholic alternatives;
- Provides and actively promotes substantial food;
- Serves alcohol responsibly or not at all; and
- Promotes safe transport options.

### Approach

The following is the SKYCITY programme regarding the responsible service of alcohol:

- SKYCITY Queenstown/Wharf will provide the sale of alcoholic beverages in a responsible manner, including monitoring and controlling of alcohol consumption;
- SKYCITY Queenstown/Wharf will ensure that it observes the provisions of the Sale and Supply of Liquor Act 2012 (the "**Liquor Act**") relating to the permitted hours within which customers can be sold and supplied alcohol and customers and staff are permitted on licensed premises;
- SKYCITY Queenstown/Wharf will maintain an effective responsible service of alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol which must be completed prior to serving alcohol;
- All SKYCITY Queenstown/Wharf employees, temporary and contract staff will receive training on the Responsible Service of Alcohol during their induction as part of the Host Responsibility Level 1 training programme, including recognition of excessive alcohol consumption traits;
- SKYCITY Queenstown/Wharf will ensure intoxicated customers are prevented from entering the premises;
- Any customer who appears under the age of 25 may be asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, that customer will not be served or supplied with any alcohol;
- Staff will tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including, where possible, enlisting the services of staff of similar social/ethnic background to the customer;

- No customer who appears intoxicated will be served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another;
- At all times, when liquor is being sold or supplied to members of the public, there is a manager or managers on duty who hold current Manager's Certificates under the Liquor Act;
- Customers may not bring alcoholic beverages onto the premises where beverage service is provided, unless prior approval has been given;
- SKYCITY Queenstown/Wharf will ensure that a reasonable range of non-alcoholic drinks is available at reasonable prices;
- SKYCITY will ensure that a reasonable range of low-alcoholic drinks (being less than 2.5% ethanol by volume at 20 degrees Celsius) is available;
- SKYCITY will ensure that a reasonable range of food is available at all times in portions suitable for a single customer, at reasonable prices, and within a reasonable time of being ordered;
- SKYCITY will readily provide free, comprehensive and accurate information to customers about the forms of transport available from the premises; and
- Free water will always be available to customers.

### **2.1.3 Unattended children**

#### **Background**

SKYCITY management does not allow children to be left unattended on any part of its premises.

#### **Approach**

SKYCITY Queenstown/Wharf takes active steps to prevent children being without adult supervision.

Employees must report to Security any incident where it is apparent that a child has been left unattended.

Security Officers must intervene and take all practicable steps to locate an adult responsible for an unattended child.

Security must contact the Police and trespass the customer in every case where there is an absence of a reasonable explanation for the child being left unattended.

In all instances of unattended children, the Host Responsibility team must be notified as soon as practicable to follow up potential problem gambling issues.

## 2.1.4 Underage persons

### **Background**

SKYCITY is committed to keeping minors out of the gambling area. SKYCITY will rigorously enforce the prevention of underage gambling in its casinos.

### **Approach**

SKYCITY Queenstown/Wharf must take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gambling facilities (currently 20 and over).

Any customer who appears under the age of 25 is asked for verification of identity and proof of age before being permitted to enter the gambling area.

SKYCITY Queenstown/Wharf must take all reasonable steps to restrict access to 'supervised areas' only to those persons legally permitted by age to enter the area (currently 18 and over), unless accompanied by a parent or guardian.

Training for SKYCITY Queenstown/Wharf Security and Gaming staff must include the need to be particularly vigilant for the presence of underage persons.

Any SKYCITY Queenstown/Wharf staff member has the authority to approach suspected underage persons and seek identification for proof of age.

## 2.1.5 Standards of dress and behaviour

### **Background**

SKYCITY Queenstown/Wharf must provide a comfortable environment where customers are able to enjoy their surroundings without disruption from others who are inappropriately dressed or behaving in an unacceptable manner.

### **Dress code**

SKYCITY Queenstown/Wharf requires a neat and tidy standard of dress. While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at SKYCITY Queenstown/Wharf's casino:

- torn clothes;
- gang patches or other insignias;
- offensive logos;
- dirty clothes or footwear; or
- hats, caps or sunglasses (unless for religious or medical reasons or for Texas Hold'em Poker).

### **Behavioural standards**

If a customer is detected:

- under the influence of alcohol;
- abusing or threatening staff or other customers;
- causing conflict with other customers or staff, or
- otherwise being unpleasant,

then SKYCITY Queenstown/Wharf staff must:

- take appropriate steps to stop the behaviour, or
- in appropriate circumstances, have the customer escorted from the premises.

Customers exhibiting undesirable behaviour may be trespassed or excluded.

## 2.1.6 Gambling limitation

### SKYCITY Queenstown Casino

SKYCITY offers customers a voluntary Pre-Commitment system.

This system is available to all casino patrons at the SKYCITY Queenstown casino (but not yet at the SKYCITY Wharf casino) and allows customers to voluntarily set limits on how much they spend and how long they play for on gaming machines.

Breaches of pre-commitment limits and multiple increases or disabling of pre-commitment limits are general indicators of problem gambling.

Host responsibility staff will proactively encourage the use of this system, where appropriate, during interactions with patrons.

### SKYCITY Wharf Casino

SKYCITY Wharf does not have the same gaming management system (the "Bally" system) as the SKYCITY Queenstown casino, and so cannot offer its customers the voluntary pre-commitment system. Until the Bally system is installed, SKYCITY Wharf will continue to offer the VIP Agreed Limitation Programme.

The VIP Agreed Limitation Programme is a harm minimisation initiative for VIP customers. It is available on request to all VIP customers. SKYCITY Wharf Casino may also offer it to VIP customers who are identified as being at risk of harm in the circumstances described below.

The key criteria for offering Agreed Limitation are that the customer and the casino agree that it will support the at-risk customer to gamble without experiencing harm. Participation is closely monitored and reassessed. Where infringements occur, the casino takes appropriate action. This may include approaches to the customer and Exclusion in circumstances where the customer is unable to continue gambling without experiencing harm.

Customers who are eligible for participation in the Agreed Limitation programme are offered a 'Time Out' programme to assist in minimising the potential for gambling harm. 'Time Out' requires the customer to take a break from all play at SKYCITY Wharf Casino for three, six or nine months.

An offer of Agreed Limitation is not a substitute for, or an alternative to the provision of information on the availability of Self-Exclusion. Agreed Limitation will only be made available in circumstances where a customer can gamble without experiencing harm. Customers identified for participation in the Agreed Limitation programme are provided with information regarding exclusion options prior to signing an Agreed Limitation Agreement. Should a customer on the Agreed Limitation Programme request Self-Exclusion, this request must be facilitated immediately and will take precedence over any Agreed Limitation Agreement.

Agreed Limitation is not intended to be a replacement for professional counselling. Contact details for problem gambling counselling services are available to customers at all times and any customer wishing to access these services is supported to do so.

Details for administering Agreed Limitation are shown in the Agreed Limitation SOP.

## **2.2 Host responsibility information for customers**

### **Customer information resources**

SKYCITY produces a range of host responsibility information resources for customers. Copies of all SKYCITY brochures and other host responsibility information resources are available and displayed where appropriate in SKYCITY Queenstown/Wharf gambling areas.

This information is also supplemented and supported by the SKYCITY Queenstown website ([www.skycityqueenstown.co.nz](http://www.skycityqueenstown.co.nz)) (which covers both properties) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is also available on the SKYCITY Queenstown website.

There is an ongoing process of review and development of resources for customers.

Information resources are translated into a variety of languages consistent with the cultural make-up of SKYCITY Queenstown/Wharf's customer base.

A summary of SKYCITY Queenstown/Wharf host responsibility resources for customers is shown in Appendix A.

## 2.3 Employee gambling-related harm

### Introduction

SKYCITY is committed to developing an internal culture that proactively supports and promotes host responsibility.

### Background

SKYCITY undertakes a range of measures concerning the potential for employee gambling-related harm that aim to:

- Prevent and minimise gambling-related harm amongst SKYCITY employees as a result of their own or someone else's gambling;
- Enhance the ability of SKYCITY staff to undertake effective host responsibility; and
- Contribute to the prevention and minimisation of gambling-related harm in the community.

These measures are intended to address the operator licence condition:

'24(f) assistance to casino employees with managing the potential for personal problem gambling.'

### Requirements

SKYCITY Queenstown/Wharf recognises that employee gambling-related harm is a sensitive issue. Accordingly, measures to promote awareness and encourage and support help-seeking will be discreet and interventions with SKYCITY staff kept confidential.

SKYCITY Queenstown/Wharf will undertake the following to provide assistance to casino employees with managing the potential for personal problem gambling:

### Information resources

- Develop supporting resources for staff that will be made available when required using appropriate channels, including:
  - a standardised gambling screen; and
  - self-help resources to assist with early self-identification and intervention;
- Include information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in host responsibility training programmes and in the Workplace Support (employee assistance) programme;
- Promote awareness about self-assessment and self-help resources, and encourage staff to use these resources themselves to assist with early identification and intervention; and
- Promote information about personal problem gambling support services when staff participate in the Employee Assistance Programme, Employee Financial Assistance, and/or where appropriate where a staff member may be seeking assistance.

### Policies and procedures

- Prohibit staff from gambling at any SKYCITY owned or operated casino;
- Prohibit access to online gambling sites by staff while on SKYCITY premises, unless such access is required for genuine business reasons; and
- Identify high risk areas for staff and target with increased levels of information.

### Recruitment

- Assess all job applicants for evidence of problem gambling (via questions in job application forms);

- Decline applications from those who are identified as problem gamblers either through their screening results, or disclosure of relevant indicators (as set out in the SKYCITY Identification Policy) during the recruitment process and provide appropriate information, advice and assistance; and
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Queenstown/Wharf Host Responsibility Programme.

#### **Support for staff**

- Provide assistance to staff who are experiencing gambling-related harm, including:
  - Identification;
  - Intervention;
  - Referral to confidential support through the Employee Assistance Programme and/or a problem gambling treatment provider;
  - Confidentiality; and
  - Wherever possible, SKYCITY Queenstown/Wharf will involve problem gambling counsellors in staff induction training about the signs of problem gambling among staff and customers.

#### **Engagement**

- Work with class 4 organisations to maximise the effectiveness of their Host Responsibility Programmes.

## 2.4 Stakeholder engagement

### Background

SKYCITY Queenstown/Wharf aims to maintain constructive relationships with members of the local community.

### Approach

SKYCITY Queenstown/Wharf will continue to facilitate opportunities for regular engagement to ensure local stakeholders:

- Understand and are aware of SKYCITY Queenstown/Wharf's Host Responsibility Programme;
- Are able to continue to raise and discuss operational issues in relation to host responsibility;
- Continue to have opportunities to provide input into SKYCITY Queenstown/Wharf Host Responsibility Programme and harm prevention and minimisation initiatives; and
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

SKYCITY Queenstown/Wharf convenes a bi-annual Queenstown Host Responsibility Community Liaison Group to discuss host responsibility issues. These issues primarily relate to operational processes, eg referrals, exclusions etc. There are also opportunities to discuss strategic or broader sector issues.

SKYCITY will invite representatives from:

- Treatment service providers including problem gambling and alcohol and other drugs;
- Public health providers;
- Government agencies including the Police, Department of Internal Affairs and Alcohol Advisory Council of New Zealand; and
- The Wakatipu Casino Liaison Group.

In developing and implementing its Programme, and harm prevention and minimisation initiatives, SKYCITY will consider the views expressed by members of the Liaison Group.

SKYCITY will make available to the Liaison Group a copy of the report provided to the Commission under section 3 of this Programme.

SKYCITY also arranges site visits, including presentations, for representatives to become familiar with the SKYCITY Queenstown/Wharf Host Responsibility Programme. SKYCITY also undertakes off-site visits to stakeholder organisations.

## 2.5 Environmental design

### Approach

SKYCITY's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol.

### Considerations

In considering the impact of any proposed changes, the key objectives are to ensure that environmental features:

- Contribute to harm prevention or have a neutral impact on harm;
- Encourage responsible gambling and alcohol consumption choices;
- Do not contribute to the onset of harm or exacerbate risk; and
- Facilitate effective host responsibility, particularly early identification and intervention.

This approach applies to the following SKYCITY areas:

- Floor lay-out, furnishing and design;
- Casino electronic gaming machine and table game location;
- Access to cash;
- Game and equipment features;
- Environments adjacent to the gaming floor, including access to other entertainment options;
- Physical location and presence of Security and Host Responsibility;
- Location of information resources; and
- Access criteria, including dress codes and age restrictions.

### Requirements

SKYCITY shall in its environmental design seek to ensure:

- Problem/responsible gambling signage and exit points are clearly visible;
- Patrons are visible to venue staff on the gaming floor;
- Where possible, machine alleys with no exit point and dimly lit corners are avoided;
- Gambling areas are well lit, utilising natural light where appropriate;
- Clocks are visible in the gambling areas; and
- Other non-gambling entertainment options are available.

### Other regulatory processes

All applications for construction or design changes to gambling areas must be approved by the Gambling Commission. As part of any such application, SKYCITY assesses any impacts the alterations may have on harm prevention and harm minimisation. The impact of any proposed design change on gambling harm is assessed in determining the suitability of any such proposal prior to making applications to the Commission.

## **2.6 Safe gambling environment – gaming machine play**

### **Requirements**

SKYCITY will take all reasonable and practicable steps to ensure a customer plays no more than one gaming machine at a time.

### **2.6.1 Safe gambling environment – third party loans for financial gain**

#### **Legislation**

Under section 15(1) of the Act, SKYCITY is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the former Casino Control Authority (CCA) or the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided by SKYCITY at the Queenstown/Wharf casinos.

#### **Policy**

SKYCITY does not permit loan transactions by third parties for financial gain at the casino venues, except as approved by the CCA or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or “loan sharking” as it is known.

#### **Requirements**

- SKYCITY will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- SKYCITY will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process SKYCITY will maintain an Undesirable Behaviour Standard Operating Procedure which shall explain how SKYCITY will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, SKYCITY will investigate and act in a timely manner. This process is outlined in the SKYCITY Queenstown/Wharf Undesirable Behaviour Standard Operating Procedure.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, SKYCITY will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, SKYCITY may issue that customer with a requirement to leave the premises, pending further investigation. At the completion of its investigation, and where a person is found to be offering loans for financial gain, SKYCITY will issue that person with a trespass notice.
- SKYCITY will notify Department of Internal Affairs Gambling Inspectors of suspected loan sharking activity in accordance with Minimum Operating Standards (MOS) for Records and Notification. Where appropriate, SKYCITY will also notify relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e. not the casino), SKYCITY will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.

- Depending on the outcome of the GOI investigation, the customer may be issued with a SKYCITY Exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- SKYCITY will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

## **2.6.2 Safe gambling environment – cheque retention**

### **Policy**

SKYCITY will when accepting cheques which it will hold unbanked by arrangement with a customer report this to Host Responsibility.

### **Requirements**

Host Responsibility staff will monitor and record the activities of any customer whose cheque it is holding unbanked by arrangement for indicators of potential gambling harm.

## 2.7 Responsible marketing

### Legislation and industry codes

SKYCITY's marketing activities comply with applicable laws, Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004, relevant industry codes (including the New Zealand Advertising Standards Authority "Code for Advertising Gaming and Gambling") and licence conditions.

### Requirements

SKYCITY Queenstown/Wharf will not pursue marketing initiatives which have any of the characteristics set out below. Where concerns are raised by third parties, SKYCITY will investigate and, where appropriate, take immediate action to withdraw or amend the marketing initiative.

SKYCITY Queenstown/Wharf will ensure an internal process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of SKYCITY's loyalty programme.

This process includes consultation with Host Responsibility as well as the Regulatory team, with final sign-off by Legal (both of which are based at SKYCITY Auckland).

Consultation includes consideration of the following principles.

Does the marketing initiative:

- Target groups at increased risk of experiencing gambling harm?
- Target minors, portray minors participating in gambling activities, or advertise gambling on radio/television at times when minors are more likely to be exposed?
- Encourage or reinforce gambling behaviour(s) that may be associated with harm, including:
  - encourage customers to participate beyond their limits of time or money?
  - discourage customers from taking breaks?
  - promote gambling as a means of relieving financial or personal difficulties?
  - state or imply that gambling is a means of winning or paying for household staples, education or housing commitments?
  - promote excessive alcohol consumption or associate gambling with excessive alcohol consumption?
- Present gambling in an unrealistic, misleading, or deceptive way, including:
  - exaggerating the chances of winning or the size of the prize, including a promise of winning?
  - stating or implying that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game?
  - exploiting superstitions or concepts of luck?

## **2.8 Display of signage and provision of gaming information to customers**

### **Background**

A key component of the Programme is the provision of information for customers. Provision of information is intended to assist customers to make informed decisions about their gambling and alcohol consumption while at SKYCITY.

A description of how SKYCITY will discharge its obligations to offer information and advice to persons identified as problem gamblers is addressed in the Problem Gambler Identification Policy and the SOPs.

### **Approach**

SKYCITY has a range of information resources that are provided to customers, summarised in Appendix A.

### **Display of signs, brochures, clocks and website**

SKYCITY ensures that:

- Host responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of SKYCITY Queenstown/Wharf's visitors;
- Brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations;
- All gaming machines and gaming tables at SKYCITY display problem Gambling Helpline telephone numbers, with information in a range of languages. The information is also displayed on or near all ATMs and public phones;
- Clocks are on display in all SKYCITY gambling areas; and
- Call Centre facilities include a direct line to the Gambling Helpline.

SKYCITY Queenstown/Wharf will make available a 'responsible gaming' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are, that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

SKYCITY actively promotes the Gambling Helpline and other free problem gambling counselling service contact details through its host responsibility resources. Customers demonstrating potentially harmful behaviour are encouraged to contact these services. All excluded customers, and third parties who contact SKYCITY about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

SKYCITY Entertainment Group Limited has a host responsibility section on its website.

### **Display of game rules, permissible bets and payment of winning bets for table games**

Information is made available to customers that pertain to game rules, permissible bets and payment of winning bets as required by section 175 of the Act.

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies minimum and maximum bets, and payments of winning bets. Signage is also displayed stating that staff cannot accept tips.

**Display of game rules, permissible bets and payment of winning bets for electronic gaming machines**

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the "Responsible Gaming" brochure, which is available on the gaming floor.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, an appropriate gaming employee will explain this and can provide a "How to Play" brochure.

**Display of game rules, odds of winning and information on problem gambling for Fun Play Tables**

Information is made available to customers that pertains to game rules, odds of winning and information on problem gambling.

Whenever a Fun Play table is open, information is displayed which advises customers that the game rules for the game are available upon request, and odds of winning and information on problem gambling.

**Display of host responsibility information in open areas where there are gaming machines**

Information on problem gambling and responsible gambling are displayed and made available to customers in open areas (e.g. decks) where gaming machines are present.

**Information requests by customers**

Customers wishing to seek further clarification of game rules will be given access to the relevant approved rules.

**Information on gambling activity**

Patrons (both loyalty and non-loyalty) can be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

## 2.9 Learning and development

### Introduction

SKYCITY Queenstown/Wharf is committed to developing staff awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. SKYCITY Queenstown/Wharf shall comply with its statutory obligations relating to problem gambling awareness training, including as set out in Regulation 12 of the Gambling (Harm Prevention and Minimisation) Regulations 2004.

SKYCITY Queenstown/Wharf will aim to ensure its learning and development initiatives are appropriate to the needs of its customers and staff.

SKYCITY's learning and development resources approach employs established models of best-practice and include a training mix of classroom based, multi-media and on-the-job coaching. Learning and development resources are tailored depending on the roles and responsibilities of staff, and their required host responsibility customer interactions.

### Overview of staff roles

**Staff:** All staff, regardless of position, are trained to identify indicators of harm. Staff are expected to refer the observation of indicators to a supervisor/manager.

**Frontline staff:** All staff who have contact with gambling customers in the casino are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Frontline staff have a primary role in being alert to and identifying indicators of harm, and will report observations of concern to a supervisor/manager. While it is not their primary role, frontline staff are trained and will approach customers themselves in circumstances, for example, where a matter is urgent or a manager/supervisor is not available.

**Supervisor or manager:** The supervisor/manager is the first point of contact for escalation for indicators of harm. Depending on the circumstances, the supervisor/manager delivers interventions by providing information, advice and assistance to customers and taking other appropriate action(s) to minimise harm.

Supervisors and managers are also responsible for ensuring that all observations of indicators reported to them by staff, and follow up responses taken by staff and/or supervisors and managers, are logged and sent to Host Responsibility. Supervisors and managers are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

**Host Responsibility:** Host Responsibility record, collate and analyse all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers. They also record interactions and interventions they undertake themselves. The information is used to undertake a section 309 assessment. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken by frontline staff, managers or supervisors or by Host Responsibility staff. This may include meeting with customers. Host Responsibility staff are responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff.

## **Learning and development requirements**

### **Induction training (Level 1)**

All permanent staff, whether or not in direct contact with customers, must participate in two hours of face-to-face training within a reasonable timeframe of commencement (approximately two months). This training includes:

- Responsible service of gambling and alcohol;
- Identification of problem gamblers;
- Reporting and recording procedures for observations;
- Approaching and providing information about problem gambling to players; and
- Awareness of employee gambling-related harm.

For all staff in direct contact with customers, SKYCITY will work to supplement this classroom-based training with on-the-job coaching and support.

Level 1 refresher training will occur at least once a year as noted below.

### **Training for supervisors (Level 2)**

Supervisors from Gaming, Food & Beverage, and Security & Surveillance must participate in supplementary Level 2 training. This training is an e-learning module and is to be undertaken within three months of commencement or promotion to a supervisor position. The training includes information on:

- Identification of problem gamblers;
- Overview of the legal framework and Host Responsibility Programme;
- Initial action with respect to customers requesting problem gambling assistance;
- Identification and intervention with respect to excessive alcohol consumption;
- Support of staff who have intervened and debrief; and
- Importance of reporting.

### **Advanced training (Level 3)**

Advanced training, supplementary to induction training, is provided for selected senior employees who may be expected to deliver interventions to customers. This includes managers working in Gaming and Security & Surveillance.

This training includes both theoretical and practical components and can be completed in modules using a range of learning techniques suitable to the SKYCITY Queenstown environment. Topics include:

- SKYCITY's legal and regulatory requirements;
- Identification of problem gamblers;
- Intervention, including brief interventions, de-escalation and motivational interviewing;
- Debriefing and staff support;
- Problem gambling treatment processes;
- Cultural awareness;
- Advanced Responsible Service of Alcohol – intervention and slowing service; and
- Awareness of employee gambling-related harm;

### **Refresher training**

Level 1 refresher training will be delivered annually and be available to all staff. An assessment of areas of focus is to be made beforehand by Host Responsibility staff

and managers, and discussed with Host Responsibility training staff. Recall testing will be included in this regular refresher training.

Additional refresher training can be provided when a learning and development need is identified or requested.

### **General Manager training – Sale of Liquor Act**

The Licence Controller Qualification, as required by the Sale of Liquor Act, is facilitated through an external provider.

### **Suicide-awareness Training**

Host Responsibility staff and senior Security Managers are trained to respond to customers who are at risk of suicide. This training is facilitated through an external provider.

### **Informal learning and development**

As learning and development is an ongoing process, SKYCITY provides a range of other opportunities for host responsibility learning to occur. There is an emphasis on sharing information and experiences across SKYCITY's portfolio to build host responsibility knowledge. These internal opportunities include:

- Internal communications, e.g. staff newsletters;
- Inclusion in business or management processes, e.g. staff meetings and key performance indicators;
- Discussion forums led by Host Responsibility staff; and
- Participation by staff in the harm minimisation and host responsibility policy development process.

### **Evaluation**

SKYCITY undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement. These measures include:

- Staff training feedback and evaluation forms;
- Staff knowledge recall and application of knowledge;
- Staff focus groups; and
- Analysis of training needs.

## **2.10 Identification of problem gamblers**

A copy of SKYCITY's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme. The policy fulfils SKYCITY's obligations under the following sections of the Act.

Section 308 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must have a policy for identifying problem gamblers, which includes:

- an acceptable definition of problem gambling;
- indicators of problem gambling in the casino; and
- the steps to be taken in identifying actual or potential problem gamblers.

This policy must be made available upon request. SKYCITY must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

Section 309 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must, after identifying a person who he or she has reasonable

grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) The self-exclusion procedure available; and
- (b) Any procedures described by Regulations made under the Act.

## 3.0 Monitoring and reporting

### Introduction

SKYCITY will evaluate its performance against the objectives of the Programme.

The Queenstown/Wharf Host Responsibility Programme is measured and monitored using a range of indicators that are set out below. These indicators reflect the level of activity under the Programme, compliance with legal obligations, and progress against all the Programme objectives as set out in section 1.

As the Programme is implemented and embedded into the business, and any initiatives are developed, SKYCITY Queenstown/Wharf may seek to amend this section of the Programme, prior to the Commission's next two-yearly review.

### Reports to the Gambling Commission

SKYCITY will report annually to the Commission on the implementation of the Programme.

Reports will include the following information:

- A description of the resources put into the core elements of the Programme;
- A description of activities undertaken by SKYCITY under the Programme;
- Reporting against the measures specified below, including a comparison to previous data where applicable;
- SKYCITY discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the Department of Internal Affairs and other meetings held as required; and
- Proposed improvements to the Programme.

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
<ul style="list-style-type: none"> <li>Number of customers about whom there have been observations.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of observed indicators reported to Host Responsibility.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of approaches to SKYCITY by third parties.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>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.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of GOI files by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> <li>Preferred mode of gambling.</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of approaches to customers to offer information about self-exclusion.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of exclusions (both casino and self-exclusions) by: <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/SKYCITY)</li> <li>Following re-entry.</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in Limitation Programme (at Wharf Casino)</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of customers participating in Multi-site Exclusions.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of excluded customers (both casino and self-exclusions) agreeing to be contacted by help services on exclusion form.</li> </ul>	SKYCITY	Annual

<ul style="list-style-type: none"> <li>Number of breaches of exclusion (both casino and self-exclusions) by: <ul style="list-style-type: none"> <li>Ethnicity</li> <li>Gender</li> <li>Age</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of exclusions by length: <ul style="list-style-type: none"> <li>3 months</li> <li>6 months</li> <li>9 months</li> <li>12 months</li> <li>24 months</li> </ul> </li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of successful and unsuccessful applications to re-enter following exclusion.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>The extent to which customers have been assisted (drawing, <i>inter alia</i>, on feedback from customers and staff).</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of persons trespassed or required to leave for making loans for financial gain.</li> </ul>	SKYCITY	Annual
<b>Measures relating to Responsible Consumption of Alcohol</b>		
<ul style="list-style-type: none"> <li>Number of "Under the Influence" (UTI) incidents (internal report).</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of Police contacts citing SKYCITY as venue where their last drink was served.</li> </ul>	Police Alcolink database	Annual
<b>Measures relating to Staff Training</b>		
<ul style="list-style-type: none"> <li>HR1 courses</li> <li>HR2 courses</li> <li>HR3 courses</li> <li>Refresher training</li> <li>Number of staff who need to be trained in each category, and proportion of those staff who have completed the appropriate level training.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures.</li> </ul>	L&D Evaluations Mystery Shopper	Annual Annual
<ul style="list-style-type: none"> <li>Staff perceptions of the effectiveness of training.</li> </ul>	L&D Evaluations	Annual
<ul style="list-style-type: none"> <li>Staff perceptions on the effectiveness of the Employee Gambling Harm Programme, reporting to the Commission to include percentage response rate of staff to the SKYCITY survey.</li> </ul>	SKYCITY commissioned survey	Annual
<b>Other Programme activity and compliance-related measures</b>		
<ul style="list-style-type: none"> <li>Number of internal and external underage incidents.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of unattended children.</li> </ul>	SKYCITY	Annual
<ul style="list-style-type: none"> <li>Number of Requests to Leave the Premises (RTLPs).</li> </ul>	SKYCITY	Annual

## Appendix A – Current Host Responsibility Resources for Customers

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**“Being A Responsible Host: Our Commitment To Our Customers”** – poster  
SKYCITY developed and displays the A3 “Being a Responsible Host” poster in key gaming areas. The customer-focused poster is designed to provide an overview of SKYCITY’s Host Responsibility Policy and the key initiatives undertaken.

**“Would you like a Helping Hand?”** – brochure  
SKYCITY provides “Would you like a Helping Hand” – brochures in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer. The brochure provides the Gambling Helpline information and signs and symptoms of problem gambling. It also outlines other free problem gambling counselling services.

**“Would you like a Helping Hand?”** – poster  
In supplementing the “Would you like a Helping Hand” – brochure, SKYCITY also produces an A1 poster version. The poster provides the Gambling Helpline number and is displayed in various places across gambling areas including some customer restrooms.

**“Would you like a Helping Hand?”** – wallet card  
This pocket size card also supplements the brochure and presents the Gambling Helpline number and other free problem gambling counselling service contact numbers. Available in Chinese, English, Tongan and Samoan.

**“Responsible gaming?”** – brochure  
This brochure provides responsible gambling tips and an overview of the odds of winning and player returns and highlights that casino games are based on chance and randomness. It also provides Gambling Helpline and SKYCITY Host Responsibility contact details. Available in Chinese and English.

**“Self-Exclusion at SKYCITY”** – brochure  
The brochure outlines the self-identified exclusion process. It provides simple information on frequently asked questions and shows Gambling Helpline and SKYCITY Host Responsibility contact details. The “Self-Exclusion at SKYCITY” brochure is available in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer.

**“Concerned About Someone’s Gambling? SKYCITY Can Help”** – brochure  
The brochure outlines the SKYCITY (third party) exclusion process. It provides simple information on frequently asked questions and shows Gambling Helpline and SKYCITY Host Responsibility contact details. The “Concerned About Someone’s Gambling? SKYCITY Can Help” brochure is available in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer.

**“Why We Can’t Serve You”** – tent card  
This card provides a summary of the SKYCITY Responsible Service of Alcohol Policy. The tent card is provided to all staff to show to customers when explaining decisions regarding service of alcohol, including the slowing or stopping of service.

**“Children at SKYCITY”** – brochure  
The brochure explains New Zealand law and SKYCITY’s policy with respect to unattended children. It is available in Chinese, English and Hindi.

## Appendix B

# **SKYCITY Host Responsibility**

# **PROBLEM GAMBLER IDENTIFICATION POLICY**

(Gambling Act 2003, sections 308-311)

## **Problem Gambler Identification Policy**

References: Gambling Act 2003 ("Act"), sections 308, 309, 310 & 311

### **Objective**

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Act to enable SKYCITY to take all reasonable steps to identify actual or potential problem gamblers and to act on that information.

### **Statutory Requirements**

Section 308 of the Act requires the holder of a casino operator's licence who is conducting casino gambling to develop a policy for identifying problem gamblers. This Policy has been developed by SKYCITY pursuant to section 308(1). Using this Policy, all reasonable steps must be taken to identify actual or potential problem gamblers.

Section 309 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of the licence holder, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) the self-exclusion procedure available; and
- (b) any procedures prescribed by Regulations made under the Act.

After offering information or advice, the holder of a casino operator's licence may issue an exclusion order to the person that prohibits the person from entering the gambling area of the casino venue for a period of up to two years.

Section 310 of the Act requires that the holder of a casino operator's licence, or person acting on their behalf, must promptly, after being requested, issue an exclusion order to a person that prohibits the person from entering the gambling area of the casino venue for a period of up to two years if the person:

- (a) has identified himself or herself as a problem gambler; and
- (b) has made a request to prohibit themselves from entering the venue concerned.

Section 311 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of, must remove any person who enters the gambling area of a casino venue in breach of an exclusion order.

### **Scope of SKYCITY Problem Gambler Identification Policy**

This Policy describes:

- The legal definition of a problem gambler;
- Indicators of problem gambling;
- A description of sources of indicator data to be used by SKYCITY;
- A description of how indicator data is to be used by SKYCITY to identify problem gamblers; and

- An outline of record keeping requirements and review of the Policy.

### **Supporting Standard Operating Procedures (SOPs)**

The following SOPs provide operational guidelines relevant to the Policy:

- Information Collection and Collation;
- Analysis and Intervention;
- Exclusion; and
- Agreed Limitation.

## Section One – Definition of a problem gambler

Under the Act, a problem gambler is “a person whose gambling causes harm or may cause harm”.

“Harm” is defined as:

- “(a) harm or distress of any kind arising from, or caused or exacerbated by, a person’s gambling; and
- (b) includes personal, social or economic harm suffered:
  - (i) by the person; or
  - (ii) the person’s spouse, partner, family, whanau, or wider community; or
  - (iii) in the workplace; or
  - (iv) by society at large.”

## Section Two - Indicators of problem gambling

### Introduction

SKYCITY uses a number of indicators to assess whether a customer is likely to be a problem gambler. Although these indicators provide an appropriate basis for making determinations as to whether someone is a problem gambler, the nature and range of indicators may vary from one customer to the next. Wherever possible, indicator information should be interpreted in the context of other relevant information to develop an overall assessment of the customer's position.

Based on research and evidence, SKYCITY has developed a list of visible signs and behaviours that may be indicators of gambling-related harm. Some of these can be considered "high confidence" or "strong indicators".

"*Strong indicators*" are those where the presentation of even one or two indicators is usually sufficient to identify the person as a problem gambler.

Other indicators referred to as "*general indicators*" are behaviours which may be observed in a range of gamblers, but occur more frequently amongst problem gamblers. They are warning signs that may, or may not, indicate a problem if only one or two factors are observed in isolation, but which become indicative when a greater number of signs are observed together or across time.

Problem gamblers can be identified by inferring that harm is present or may occur using the indicators set out below. They can also be identified on the basis of information from customers or persons affected by a customer's gambling behaviour. Customers (and affected persons) may directly disclose that the customer is experiencing problems with gambling or requires assistance (eg, they want to self-exclude), or do so indirectly.

### INDICATORS

#### ***Strong Indicators***

- Requests to self-exclude;
- Self-identified problem gambler;
- Self-disclosures that may or may not make reference to the person's gambling;
- Third-party disclosures that may or may not make reference to the person's gambling; or
- Severe emotional distress due to gambling, including expression of suicidal thoughts.

#### ***General indicators***

##### *Intensity and Frequency of Play*

- Very high visitation frequency (for example, 5 times per week up to daily) combined with high levels of expenditure on gaming machines (for example, \$250+ lost per session) over a period of time (for example, 1 month);
- High visitation frequency (for example 2 times per week or more), combined with very high levels of expenditure on gaming machines (for example, \$400+ lost per session) over a period of time (for example, 1 month);
- High visitation frequency combined with very high levels of expenditure on all forms of gambling, including table games, over a period of time;
- Very few breaks from gambling – almost continuous play;

- Increasing periods of play, and betting more each time, noted over a period of time (noting that gambling expenditure may reduce as the customer's financial resources are exhausted);
- Disconnect with time spent playing, including missing key times (eg, meals), rushing when leaving machine or staying after friends/family leave;
- Extreme changes in patterns of play; or
- Breaching pre-commitment limits and/or multiple increases or disabling of pre-commitment limits (where pre-commitment is available).

#### *Visible Emotional Disturbance*

- Emotional distress including agitation, mood swings, crying, holding head in hands, or out-of-character behaviour;
- Personalising machines, including abuse of machines;
- Irritated by interruptions to gambling;
- Rudeness and complaints to staff about gambling outcomes; or
- Possessiveness of particular machines or spots at tables (eg, standing over other patrons, hovering, aggression).

#### *Dysfunction in Social Behaviour*

- Attempts to conceal gambling activities, including making phone calls giving excuses for lateness;
- Steps apparently taken to avoid monitoring of gambling activity, such as ceasing to use a loyalty card;
- Not celebrating wins;
- Disintegration of physical appearance (eg, clothing or personal hygiene) over time;
- Family/friends seeking out or enquiring about a customer;
- Falling asleep at a machine or table;
- Claims of malfunction of gaming machines or gaming errors;
- High consumption of alcohol while gambling (eg, demanding drinks);
- Interaction with a known or suspected loan shark;
- Unattended children;
- Breach of an Agreed Limitation agreement; or
- Previous breach-history of barrings or exclusion orders.

#### *Excessive Access to Money*

- Leaving the casino to get additional money and coming back after having appeared to have run out of money;
- Repeated ATM visits and/or multiple declined transactions;
- Borrowing money, including begging;
- Not having sufficient money to exit car park;
- Constant demand for complements; or
- Tray-surfing.

### **Expenditure and Frequency of Play**

Both expenditure and frequency of play, especially on gaming machines, are currently included as general indicators, rather than as strong indicators, because it is recognised that not all customers who exhibit high expenditure levels and frequent visitation are necessarily problem gamblers. However, such indicators are much more likely to be observed amongst problem gamblers than others and therefore may indicate a greater risk of gambling related harm. It is established from international research that problem gamblers are more likely than other players to lose control of their expenditure, to chase their losses, and to have very strong urges to gamble. Most studies of problem gambling have found that problem

gamblers spend significantly more, and gamble significantly more frequently than other players.

Frequency and expenditure data are especially important as indicators in the case of users of gaming machines for several reasons:

- It is easier for people to gamble without being noticed because gaming machine gambling involves very little interaction with casino staff, compared to table games, making it less likely that their behaviour and emotional reactions will be observed;
- There is a stronger relationship between problem gambling and play on gaming machines than with other forms of casino gambling;
- Electronic data gathering from gaming machines is more accurate than from table games.

#### **Other Observations**

The indicators listed above are not exclusive – staff are encouraged to report observations of customers based on other factors which raise concerns.

## Section Three – Sources of Indicator Data

The indicators described in Section 2 may emerge from the five principal sources of information SKYCITY collects, collates and analyses. Information sources include:

- customer disclosures;
- behavioural observations;
- customer data including loyalty;
- third-party disclosures; and
- interviews with customers or staff.

All information on customers collated from the sources described below is recorded as soon as practicable into iTrak, SKYCITY's incident reporting and retrieval database.

iTrak centralises information from multiple business sources (Security, Surveillance, Host Responsibility and Gaming) which can be shared, when appropriate, across the SKYCITY Group.

Host Responsibility use iTrak to record, manage, review and assess all information about all customers on the database, including gamblers of interest and excluded or banned customers.

### **CUSTOMER DISCLOSURES**

Customer disclosures may or may not make reference to the person's gambling (ie, they may be direct or indirect).

#### **Direct disclosures**

Direct disclosures make reference to a customer's gambling and examples may include any of the following:

- I think I have a gambling problem;
- I want to be excluded/barred; or
- I don't want to come here anymore.

#### **Indirect disclosures**

Indirect disclosures do not make reference to a customer's gambling and examples may include any of the following:

- Comments regarding impact on personal life;
- Voicing repeated attempts to stop or control gambling;
- Comments regarding psychological distress; or
- Comments regarding financial distress.

The significance of indirect disclosures should be determined by the nature of the disclosure. Indirect disclosures referring to harm, financial difficulties or loss of control would lead to a high suspicion that the person was experiencing, or at risk of experiencing, harm associated with their gambling.

Direct and indirect disclosures from customers must be recorded and sent to Host Responsibility as soon as practicable to be used in making problem gambling assessments.

## **BEHAVIOURAL OBSERVATIONS**

Although staff cannot be expected to watch all customers on all occasions, the process of observation and identification is enhanced by the fact that one may observe a clustering of indicators. Those customers who present with strong indicators, or who produce several common indicators, may produce many more. In effect, problem gamblers may draw attention to themselves through observable behaviour. Staff should use this information to focus their observations to particular customers.

At the same time, there will be customers where the problematic behaviour may be 'silent' or hidden. Some patrons may gamble very frequently, spend very large amounts of money, but not produce any obvious emotional responses or other indicators to draw attention to themselves. For this reason, staff should remain vigilant to the presence of people who spend many hours in the casino, and who visit very frequently. In such cases, staff should be vigilant for additional indicators of harm. As noted below, frequency of gambling and level of expenditure are indicators in their own right, and also ways of identifying people who require additional observation.

Staff who observe the indicators specified in Section 2 must report the observation to the appropriate supervisor/manager. All observations of indicators reported to them by staff and any follow up responses taken by staff and/or supervisors/managers must be logged into iTrak by the supervisor/manager so as to make the record of the disclosure or observation available to Host Responsibility as soon as practicable. The reported disclosures and observations form part of the body of information upon which assessments of problem gambling are to be made.

## **CUSTOMER DATA INCLUDING LOYALTY**

High levels of frequency and expenditure are indicators (see Section 2). SKYCITY will monitor the amount of money and time spent over time proactively using the loyalty programme. Although high levels of expenditure and visitation are listed as general indicators, it is important that SKYCITY take steps (where it has concerns about a player's expenditure or visitation frequency) to obtain additional information that places this behaviour into context. For example, through discussions with the customer or other parties, there may be direct or indirect disclosures concerning the lack of affordability of the gambling. Alternatively, staff might find that some players who spend very large amounts appear to be chasing their losses, or are making very frequent use of ATMs, or are leaving the casino and then returning with additional money. SKYCITY may also make enquiries about the affordability of losses.

In addition, where a customer is brought to the attention of Host Responsibility by disclosure or observation, SKYCITY must ascertain whether the customer is a loyalty member. Where the customer is a member of the loyalty programme, SKYCITY will examine their data to determine:

- Their time of play;
- Duration of play;
- Turnover;
- Win/Loss;
- Patterns of expenditure (for example, increase over time);
- Games played;
- Tier upgrades;

- Non-gaming use of card (eg, car park use); and
- Visitation frequency.

### **THIRD PARTY DISCLOSURES**

Information concerning gambling-related harm may also be obtained via third-parties. This might include:

- an enquiry from a concerned family/whanau member; or
- a formal enquiry about the potential problem gambler from the wider community, (eg, probation officer, general practitioner or employer).

A third party may only seek general information about a customer, and will not always voluntarily identify gambling as the cause of their concerns about a customer (eg, who may be a friend or relative of the inquirer). Where a third party appears to express general concern about a customer, staff must ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this must be recorded in iTrak and made available to Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (eg, via Loyalty card use, if available or feasible) should be undertaken. If found, further enquiry must be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, SKYCITY must also provide to the customer problem gambler information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

A third party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm, and should be treated on an urgent basis. The third party must be referred immediately to Host Responsibility or Security. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (eg, via loyalty card use, if available or feasible) should be undertaken. If found, further enquiry must be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, SKYCITY must also provide to the customer problem gambler information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

All third party information should be corroborated as part of an internal investigation. The Exclusion SOP outlines the specific steps taken by SKYCITY in corroborating information.

### **INTERVIEWS WITH CUSTOMERS OR STAFF**

From time-to-time, Host Responsibility or other appropriate staff may interview either customers or staff as part of an investigation.

**Customer interviews:** During the course of an interview, information may be disclosed by a customer that suggests that he/she may be experiencing harm or gambling in a way that may cause harm. All such information must be recorded into iTrak and made available to Host Responsibility as soon as practicable.

**Staff interviews:** During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm or gambling in a way that may cause harm. This information must be recorded in iTrak and made available to Host Responsibility as soon as practicable.

## **Section Four - Identification**

Section 2 highlights the indicators that are taken into account in identifying whether a customer may be an actual or potential problem gambler.

Section 3 identifies the primary sources of information available to identify problem gamblers. It also describes the ways in which this information might be utilised and consolidated so as to assist in the identification process.

SKYCITY must use data from the sources identified in Section 3 to identify customers who are actual or potential problem gamblers, ie where their gambling is causing harm, or may cause harm, to the customer or others. Once identified, SKYCITY will determine, based on direct information or inference (using indicators) whether it has reasonable cause to believe that the customer is or has been gambling in a manner that has caused harm or may cause harm.

Depending on the assessment, including the perceived severity and urgency of a situation, SKYCITY provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. If there is reasonable cause to believe that a customer is a problem gambler, SKYCITY's legal obligations under sections 309-311 of the Act are engaged immediately.

### **Obligation to Identify**

The assessment by SKYCITY, whether there is reasonable cause to believe that a customer is a problem gambler, must be made in good faith, in accordance with the statutory test and within a reasonable timeframe.

### **Analysis of Information**

As outlined in Section 5, all disclosures or observations related to indicators of harm noted by staff are reported to, and recorded by, the supervisor or manager and made available to Host Responsibility.

When a disclosure or observation report is made available to Host Responsibility, Host Responsibility must collate and review all information available to it in relation to the relevant customer. This includes a review of incident reporting and loyalty databases and other relevant internal information sources. Host Responsibility may also make further enquiries of relevant staff in relation to that customer.

Host Responsibility undertakes a section 309 assessment based on the information collated.

A variety of different types of information is used when undertaking a section 309 assessment, taking into account:

- Severity of presenting indicators;
- Anti-social behaviour including uncharacteristic or unusual behaviour;
- Uncharacteristic changes in appearance;
- Changes in patterns of play; and
- Number of indicators and repetition over time.

## **Identification**

### *Strong indicators*

Direct disclosures by customers are expected to result in an immediate assessment that a customer is a problem gambler, with SKYCITY taking the required steps in response promptly.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler unless another more likely explanation is established.

For instance, although emotional distress may be a reliable and valid indicator of gambling-related harm, not all people who appear distressed will necessarily feel this way because of gambling. Therefore, if this strong indicator is evident, it would be appropriate to interpret the person's behaviour in the context of other indicators. For example, is the person gambling large amounts of money for long periods and displaying other signs of gambling-related harm? If a person only appears distressed, such people should be approached initially on the assumption that they require general assistance, but not necessarily because their gambling is a problem.

### *General indicators*

The observation of small clusters of general indicators should be sufficient to trigger further monitoring but, depending on the circumstances, may not necessarily lead to an immediate assessment that the customer is a problem gambler. As part of a graduated response, it is expected that such people should be subject to further monitoring to determine whether any further general indicators emerge, including the repetition of the same indicators. If there is an accumulation of general indicators over a period of time (eg, several general indicators recur during a one month period) SKYCITY would have reasonable grounds to consider such people to be problem gamblers.

## **Consequences of Identification**

Once identified as a problem gambler, SKYCITY must as required in section 309 of the Act, offer assistance and information to the customer about problem gambling within a reasonable time of identification, taking into account the urgency of the situation and the risk of harm. As set out in section 309 of the Act, the information or advice provided must include a description of self exclusion procedures.

## **Section Five – Record keeping**

### **Recording, collation and analysis of information**

Host Responsibility is responsible for the collation, analysis and electronic recording of all information relating to indicators of harm. Host Responsibility also keep records of observations noted by frontline staff, supervisors and managers and of all direct and third party disclosures, interactions and interventions undertaken in relation to a customer by frontline staff, supervisors and managers.

Host Responsibility also record the problem gambler assessment referred to in Section 4 above, and the outcome of that assessment.

As outlined in Section 3, all information collated by SKYCITY in relation to a customer is recorded as soon as practicable into iTrak.

Host Responsibility uses iTrak to manage, monitor, review and assess information about all customers on the iTrak database, including gamblers of interest and excluded or banned customers.

### **GOI files**

A key purpose of a GOI file is to institute a formal monitoring process in relation to a customer. A GOI file is opened by Host Responsibility:

- in circumstances where a customer has come to the attention of Host Responsibility for monitoring;
- a third party disclosure is made in relation to a customer's gambling; or
- a customer returns from exclusion having fulfilled the re-entry criteria.

SKYCITY may also open a GOI file in other circumstances, as may be appropriate, including where:

- Information is requested or presented from government agencies; or
- Suspected or actual undesirable activity is present, including unattended children, unaccompanied minors, breaches of trespass orders.

Once opened, all available customer data to assist the assessment of whether a customer is a problem gambler must be obtained and placed on the file. In the case of customers who come to attention as a result of expenditure and visitation frequency, a GOI file must be open so that further information and observations can be recorded for assessment.

SKYCITY will regularly review GOI files at a minimum, at the following intervals and more often as required:

- Monthly review for the duration of the investigation; and
- Formal 12 week review.

Whenever new information becomes available or is obtained, a problem gambling re-assessment must be undertaken. If an assessment is made that the customer is not a problem gambler after the 12 week review period, the GOI file is deactivated. If concerns remain, the file will be left open and reviewed on a regular basis.

All deactivated GOI files will be retained by SKYCITY. A GOI file may be reactivated at any stage subsequent to the 12 week review period if further information or indicators in relation to a customer emerge. In this case, a problem gambling reassessment will be undertaken, and monitoring may continue.

## **Section Six – Review**

The Problem Gambler Identification Policy will be measured and monitored as part of the Host Responsibility Programme.

Where new evidence emerges in relation to indicators of harm and identification of problem gamblers, SKYCITY will review its Problem Gambler Identification Policy accordingly.