

IN THE MATTER of the Gambling Act 2003

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

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
P J Stanley
R D Bell
A K Foote

Date of Decision: 11 May 2012

Date of Notification of Decision: 24 May 2012

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

Introduction

1. By this decision the Gambling Commission ("**Commission**") revokes the Host Responsibility Programmes ("**HRPs**") for the Hamilton and Queenstown casinos approved by the Casino Control Authority and dated 1 December 2003, and approves in their place HRPs for each casino, **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 every two years. The first revision was scheduled for 1 October 2007 or such later date as the Commission may approve. SCML submitted draft HRPs for consideration in February 2009, as approved by the Commission.
3. Potentially interested parties comprising the Secretary for Internal Affairs ("**Secretary**"), the Ministry of Health ("**MoH**"), Problem Gambling Foundation ("**PGF**"), Gambling Helpline ("**GH**"), Salvation Army ("**SA**"), Hamilton Casino Monitoring Group ("**HCMG**"), Te Runanga O Kirikiriroa and Pacific Peoples Addiction Service, were invited to make written submissions on the draft HRP for the Hamilton casino. The Secretary, MoH, PGF, GH, SA and Wakatipu Casino Liaison Group were invited to make written submissions on the draft HRP for the Queenstown casino.



4. Submissions on the Hamilton HRP were received from GH, PGF, the Secretary and HCMG; and from GH, PGF and the Secretary for the Queenstown HRP. The Commission invited submitters to file submissions in reply, which the Secretary, PGF and SCML elected to do for both HRPs.
5. SCML made a presentation on the draft HRPs at the Commission's June 2009 meeting. The Commission considered the drafts at its July 2009 meeting and identified a number of areas requiring further consideration and communicated those to SCML. SCML submitted amended drafts in August 2009, which the Commission considered at its September 2009 meeting. The Commission identified further areas requiring consideration, and communicated those to SCML. SCML submitted further drafts in November 2009, which the Commission considered at its April 2010 meeting. The Commission then put its review on hold until 2011 in order to receive additional reports from SCML on the effectiveness of the new Programme at the Auckland casino.
6. The Commission recommenced its review in 2011, liaising with SCML throughout 2011 and the beginning of 2012, before the HRPs were finalised following the Commission's May 2012 meeting.

Background

7. The SKYCITY Auckland Programme represented a considerable advance in host responsibility practice and was the result of almost two years of research and development. During this development, the Commission received the benefit of international expert advice from Associate Professor Paul Delfabbro from the University of Adelaide. Associate Professor Delfabbro's brief was to guide the Commission in the formulation of a programme which was at the forefront of international best practice in the protection of patrons from harm.
8. The Auckland Programme was far reaching and imposed obligations on SCML well beyond those required by law.
9. Following its approval, it was the Commission's intention:
 - (a) to commence a review of the HRPs for the other five casinos, with the expectation that they would use the Auckland Programme as a template and submit HRPs that were substantively identical;
 - (b) to closely monitor the effectiveness of the Auckland Programme by way of six-monthly reports from SCML to the Commission; and



- (c) to review the Auckland Programme (and, subsequently, the other HRPs) every two years.
10. The Commission commenced its review of the non-Auckland HRPs, having allowed some time to consider the effectiveness of the Auckland Programme.
 11. The review process for each HRP was quite advanced, with each casino submitting a number of drafts and re-drafts, all of which were based on the Auckland Programme.
 12. During this time, the Commission received regular updates on the effectiveness of the Auckland Programme in the form of the abovementioned six-monthly reports.
 13. Reports were received for the six months to June 2008, December 2008, June 2009, December 2009, June 2010, December 2010 and for the twelve months to December 2011.
 14. The reports were accompanied by oral updates from SCML staff and in the case of the two 2008 reports, oral and written feedback from the Department of Internal Affairs.
 15. As the Commission received and considered these reports, it became apparent that the Auckland Programme was offering valuable on-the-ground experience and learnings that should be applied to the other five casinos. For example, some aspects of the new Programme were working extremely well, while others were less effective. This was, perhaps, to be expected with a programme that was progressive and with limited international precedent.
 16. By 2011, the Commission felt that the Auckland experience was well understood and recommenced its consideration of the Hamilton and Queenstown HRPs with the confidence of that knowledge.
 17. The Commission acknowledges that this approach differs from what was originally planned and resulted in a delay in the review of the HRPs. However, the Commission considers that this has produced a superior outcome, with better HRPs for the other casinos and safer casino environments for patrons. The Commission was unconcerned about the delay as each casino has an existing host responsibility programme, and employs host responsibility practices that are of a high standard.
 18. Effective host responsibility, and effective HRPs, are the result of the evolution of both intention and practice. The knowledge gained over the past few years has been invaluable in refining both.

19. The Commission will now contact the Christchurch, Dunedin and Wharf casinos and invite them to submit draft HRPs for Commission consideration. The Commission would expect that the drafts will closely follow the Hamilton and Queenstown HRPs, with any variations being included only to improve the documents or to recognise any differences in the size and scale between the respective casinos. The Commission will then review the Auckland Programme – commencing either in late 2012 or early 2013.

Jurisdiction

20. Condition 26 of the licence conditions attached to SCML's operator's licence for the Hamilton and Queenstown casinos specifies the matters which must be included in the respective HRPs, 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.

21. The attached HRPs address the matters specified in condition 26, many of which, in turn, specify how SCML will implement obligations under the Gambling Act 2003 ("**Act**") and Regulations.
22. In relation to conditions 26(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.
23. 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.
24. 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.
25. The HRPs specify how SCML will exercise its discretion to exclude a problem gambler who has not requested exclusion.

Submissions to the Commission

26. Initial submissions identified the following major areas for consideration in the first drafts of the HRPs:
- (a) the non-inclusion of “guiding” information that was included in the Auckland document (identified by the Secretary, PGF);
 - (b) the transfer of information from the main body of the HRPs to an appendix annexed to the HRPs or to a SKYCITY Standard Operating Procedure (“SOP”) (the Secretary);
 - (c) the non-inclusion of the “limited play” option in the gambling limitation programmes (the Secretary and PGF);
 - (d) the structure and content of the Problem Gambler Identification Policies (“PGIPs”) (the Secretary).

Non-inclusion of guiding information

27. Neither the Secretary nor PGF supported the non-inclusion of the “guiding principles” and “Approach to Host Responsibility” sections, both of which are present in the Auckland Programme. The Secretary submitted that these sections have value as they provide context to the application and interpretation of the HRPs, and provide users with key information to assist in the identification of problem gamblers.
28. PGF submitted that the Harm Continuum section should be retained as it gives staff information about gambling harm and identifying problem gamblers.
29. In response, SCML submitted that the information need not be included as it is unnecessary, is repeated elsewhere, does not contain any specific obligations and that much of the wording has no impact on the outcomes it is looking to achieve.
30. Having approved the Auckland Programme with the “guiding” information included, the Commission considered carefully whether such information should be retained in the Hamilton and Queenstown HRPs, and whether omitting it would undermine them in any way. The Commission decided that removing the information would not lessen SCML’s obligations and would increase the overall effectiveness of the HRPs.
31. While the Commission could see value in the guiding information, it saw more value in removing it as the resulting documents would be more concise and easier to understand by the intended audience. The Commission thought that concepts such as a “Problem Gambling Risk and Harm Continuum”, an “Escalation Response Model” and an

"Information and Intelligence Cycle" might aid a small percentage of readers, but the majority of readers would find them too theoretical and esoteric. The Commission did not want casino staff to be "put off" using the programme for fear of misapplying such concepts.

Transfer of information to an appendix

32. SCML transferred the "Exclusion", "Responsible Service of Alcohol", "Unattended Children", "Underage Persons", and "Standards of Dress and Behaviour" sections from the main body of the HRPs to an appendix annexed to the HRPs as "these pages simply repeat or summarise the key procedural components of their corresponding standard operating procedures." The Secretary opposed the transfer, submitting that these sections should be retained in the main body of the HRPs, otherwise their importance may be undermined.
33. In response SCML submitted that the legal standing of these sections would be unaffected by where they sit in the HRPs.
34. The Commission was of the view that the abovementioned sections (and SCML's obligations in general) should be retained within the main body of the HRPs for three reasons. First, as the Secretary submitted, the separation of obligations could create the impression that those obligations contained in an appendix are of less importance than those retained in the main body. Secondly, retaining all obligations together makes the HRPs more user friendly as it provides greater clarity and ease of reference. Finally, the detail set out in the SOPs should be derived from the HRPs, and not the other way around.

Transfer of information to SOPs

35. As a continuation of this theme, the Secretary opposed SCML's relocation of section 2.61 of the HRP ("Safe Gambling Environment"), section 3 of the PGIP "Problem Gambling Analysis" and section 5 of the PGIP "Record-keeping and Preview" from the HRP to separate SOPs. SCML's rationale for the relocation was that it aided with clarity by deleting procedural detail.
36. The Secretary submitted that SCML's obligations should be maintained in the main body of the HRPs, rather than in an internal SCML document "for which there is no legislative basis or approval".
37. The Commission concurred with the Secretary for two reasons. First, the Commission's view is that it is preferable to centralise all pertinent information into a single document in order for SCML's obligations to be clear and accessible. This ease and accessibility



would be undermined if the HRP was not a standalone document and could only be applied in conjunction with external documentation.

38. Secondly, the HRPs should contain SCML's legal obligations for clarity and operability, and to ensure that the Commission can maintain a thorough oversight of them. These obligations should not be located elsewhere.

Non-Inclusion of a "limited play" option in the gambling limitation programmes

39. Condition 26(f) of SCML's operator's licence provides that the HRPs must make provision for a limitation programme. The draft HRPs provided a "time out" option for its VIP patrons, but did not include a "limited play" option, as the Auckland Programme does. A limited play option allows a patron to continue to gamble but places restrictions on the length of the gambling by reducing, for example the number of gambling days, or the length of the gambling sessions. A time out option allows a patron to take a break from all gambling for a period of time. For example, for three, six or nine months.
40. SCML submitted that it did not include the limited play option for Hamilton or Queenstown as the uptake of this option was very low at the Auckland casino and that such an option would be more difficult to administer at Hamilton and Queenstown as it has fewer staff, who already have multiple roles. SCML also did not include any detail about the limitation programme being extended beyond VIP patrons, as the Commission has envisaged.
41. PGF and the Secretary submitted that the limited play option should be available at both the Queenstown and Hamilton casinos. The Secretary did not accept SCML's submission that it would be difficult to administer, and submitted that it should be easier in the smaller casinos where VIP players are more likely to be recognised. He further submitted that an agreed limitation programme allows players to control their gambling behaviour before they experience harm but before they can do this, the tool must be available.
42. PGF submitted that a limited play option would be of value to some patrons so it was therefore worthwhile.
43. When it considered this matter for the Auckland casino, the Commission's expectation was that the Auckland Programme would form a blueprint for the other casinos with both the time out and limited play options being available to VIP gamblers, and subsequently to all casino patrons. The Commission saw no reason to deviate from this approach and formed the view that the Hamilton and Queenstown HRPs should offer the same limitation options as are available at the Auckland casino.

The Problem Gambler Identification Policy

44. The PGIPs proposed for Hamilton and Queenstown differed from that approved for the Auckland casino, as follows:
- (a) they removed the “statutory requirements” section from the front pages;
 - (b) they abbreviated the introduction of section 2;
 - (c) they removed the “expenditure and frequency of play” paragraphs from section 2;
 - (d) they significantly amended (and abbreviated) sections 3, 4 and 5.
45. The Secretary opposed the proposed changes, submitting that SCML had removed key sections of the PGIPs which should remain in place. He was concerned that the amendments would result in SCML’s obligations becoming obfuscated.
46. SCML submitted that its amendments reduced the length of the PGIPs and enhanced their clarity, while retaining the key components from the Auckland document.
47. As noted above, the Commission expected the Auckland document to be used by the other casinos as a blueprint for their HRPs, with any variations either representing an improvement on the Auckland document, or reflecting differences between the casinos (such as the size and scale of the respective operations). The Commission was of the view that the proposed PGIPs represented neither.
48. Considerable time and energy were expended on drafting and finalising the PGIP for the Auckland casino. The resulting document was an Identification Policy which was robust and met the necessary legal requirements. The Commission was of the view that the blueprint provided by the Auckland PGIP needed little change and should be followed by the other casinos, including Hamilton and Queenstown.

Other amendments to the HRPs

49. In addition to the abovementioned “macro” issues, the submission process identified the following, more specific, areas that required Commission consideration:

1.2 – Programme objectives – Resourcing

The Auckland Programme contains a paragraph stating that SCML will appropriately resource the achievement of the Programme’s objectives, whereas the Hamilton and Queenstown HRPs do not. SCML removed the paragraph because “it is unnecessary and the content self-evident.” The Secretary submitted that there is value in the paragraph remaining, and that many aspects of the HRP are self-evident, but are included nonetheless.

The Commission was unconcerned by the removal of the abovementioned paragraph. It is axiomatic that SCML must adequately resource its Programmes – if it does not, it may not meet its obligations and risks any consequences that follow from this.

1.2 – Programme objectives – Outcomes

The Secretary noted that SCML amended the “outcomes” paragraph in section 1.2 of the HRPs. The Auckland document provides that “SKYCITY intends that implementation of the Programme will assist customers experiencing actual harm from problem gambling, emerging harm or potential future harm and persons affected by those gambling behaviours” whereas the Hamilton and Queenstown HRPs state that “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.”

The Secretary was concerned that the proposed wording may give the impression that the “prevention” of harm is only necessary for those customers who are “at risk”.

The Commission was unconcerned by the proposed wording and did not consider that it lessened SCML’s obligations in any way.

2.3 – Employee gambling related harm

PGF submitted that this section should be expanded to require employee gambling related harm education, both at the employee’s induction and at annual refresher training. SCML accepted this submission.

2.4 – Stakeholder engagement

PGF submitted that the Hamilton and Queenstown HRPs should specifically state which stakeholders SCML should meet with (as the Auckland Programme does) as part of its stakeholder engagement. The Commission agreed with PGF, concluding that it is preferable to state explicitly which organisations SCML will meet with.

PGF and HCMG submitted that the Hamilton casino should regularly meet the HCMG, with the Secretary submitting that the HCMG should at least be referenced in the Hamilton HRP. SCML submitted that it did not reference the HCMG as it has had no direct contact with this group “for a considerable period of time”.

The Commission notes that there continues to be a misunderstanding surrounding the role of the HCMG (now called the Community Liaison Group), particularly amongst its members who appear to hold the view that the Group should be consulted, as a matter of right, over any change proposed for the Hamilton casino. No such right exists. Licence

condition 16 of the venue licence for the Hamilton casino provides that the Group's function "... is, where requested, to represent community views in the course of consultation and liaison activities undertaken by the Licence Holder, the Commission, the Secretary and other entities, as the case may be, relating to gambling at the casino." That is, HCMG's function is not to interact regularly and proactively with the casino, rather it is to represent the views of the community when it is requested to do so in the course of consultation. There is therefore no obligation for the Hamilton casino to meet regularly with the HCMG.

The Commission noted, however, that many members of the HCMG meet with SCML in any event because of their involvement with other organisations that are SCML stakeholders.

2.5 – Environmental design

The Hamilton and Queenstown HRPs have an abbreviated "Approach" section, removing two sentences regarding the influence environmental design can have on gambling harm. The Secretary submitted that he would be concerned if the removal of these sentences could be used to argue that SCML has reduced legal obligations for Hamilton and Queenstown compared to Auckland.

The Secretary was also not in favour of two new sub-headings, "Considerations" and "Requirements", as their use may imply that the "considerations" are less important than the "requirements".

The Commission was unconcerned by the amendments and did not consider that they reduced SCML's obligations in any way.

HCMG submitted that an additional requirement should be inserted which provides that "No ATMs should be located within 50 metres of the Hamilton casino gambling floor" as Australian research has shown a link between problem gamblers and ATM location. SCML opposed the proposal, submitting that ATM location is already addressed in the Gambling (Harm Prevention and Minimisation) Regulations 2004, and in licence conditions.

The Commission was of the view that the issue of ATM location is already adequately addressed.

2.7 – Responsible marketing

The Secretary and PGF both submitted that they would like to have the statements "SKYCITY takes a conservative approach to the marketing of gambling products" and

“The majority of SKYCITY’s marketing activities are broad-based” included in the Hamilton and Queenstown HRPs, as they are for Auckland. SCML submitted that these statements are unnecessary as they are concerned with SCML’s marketing strategy, and so are not appropriate for the HRPs.

The Commission was of the view that these statements need not be included in the HRPs as they are in the nature of guiding comments, and do not contain any obligations.

In any event, the Advertising Standards Authority has a Code for Advertising of Gaming and Gambling which guides the acceptability, or otherwise, of gambling marketing, while the Gambling (Harm Prevention and Minimisation) Regulations 2004 regulate the requirements surrounding jackpot advertising.

The Secretary noted that the Queenstown HRP did not include a statement that the marketing process includes consultation between the marketing, host responsibility and legal teams, and submitted that it should do so in order to be consistent with the Auckland and Hamilton casinos.

In response, SCML stated that the statement was not included as Queenstown does not have dedicated host responsibility or legal teams, but it proposed amending the paragraph to provide for marketing initiatives to be “cleared” by the regulatory and legal teams based in Auckland. The Commission considered this to be appropriate.

2.8 – Display of signage and provision of gaming information to customers

PGF submitted that SCML should provide patrons with information on their gambling expenditure and the length of their gambling sessions, where there is cause to believe that a customer may have problems with his/her gambling. SCML submitted that the current requirements for the provision of information to customers is appropriate and in any event, information about a customer’s gambling activity is provided by player information displays which, from 1 July 2009, allow all gaming machine patrons to obtain (from the gaming machines they are playing) information relating to their gambling, including the length of a player’s session of play, the amount spent and the net wins/net losses.

The Commission was of the view that this section did not require any further amendment.

2.9 – Learning and development

The Secretary and PGF submitted that suicide awareness training should be included in Queenstown’s HRP. SCML accepted the suggestion and stated that the HRP would be amended to include suicide awareness as part of “advanced” training.

PGF submitted that SCML should train its frontline staff to provide patrons with problem gambling advice, in addition to offering them information and assistance. SCML opposed the suggestion, submitting that its frontline staff are trained to refer concerns to their managers so that interventions can be carried out by specialist senior staff who have more advanced training.

The Commission considered SCML's proposal is to be adequate.

2.11 – Gambling limitation

The Secretary submitted that a breach of an agreed limitation programme should be included amongst the list of "strong indicators" in the PGIP, to recognise the importance that such a breach would represent. SCML submitted that such a breach is better placed amongst the list of "general indicators".

The Commission considered a breach of a limitation programme to be a general indicator. Strong indicators are those which are very clear and are such that the presentation of only one or two of them is sufficient to identify a patron as a problem gambler. General indicators are warning signs to be taken very seriously, but something less definitive than a clear request for help. The breach of a limitation programme fits more comfortably into this category.

3.0 – Monitoring and reporting

SCML did not include the measures "casino gambling expenditure", "number of new and total clients citing casino gambling as the primary mode," "average South Oaks Gambling Screen" and "staff perceptions on the effectiveness of the employee gambling harm programme ..." because they will be reported by the Auckland casino as part of a group-wide report.

SCML submitted that the measure "the number of customers on incident spreadsheet" was deleted because this information is simply a subset of the measure "number of customers about whom there have been observations."

SCML removed the measure "staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures" as it will be addressed elsewhere by the measure "staff perceptions of the effectiveness of training."

The Secretary had no objection to most of SCML's proposed changes, but questioned whether the "staff recall" measure should be removed, as did PGF.

The Commission was comfortable with SCML reporting several of the measures elsewhere, but agreed with the Secretary and PGF that the measure "staff recall" should

be retained. The Commission was of the view that the ability of staff to recall host responsibility policies and procedures is integral to the implementation of good host responsibility practices.

The Commission also saw value in retaining the measure “number of customers on incident spreadsheet.” In reporting on this measure for the Auckland casino, SCML has provided data showing whether patrons were playing gaming machines or gaming tables. The Commission sees value in this information.

The Commission welcomed the new measure for the Queenstown casino (“number of customers participating in multi-site exclusions”) and noted that this measure can now be included for the Hamilton casino as a multi-venue exclusion order has been established for central Hamilton.

HCMG, PGF and the Secretary also submitted that SCML should report information to the HCMG. For the reason outlined above in relation to “stakeholder engagement”, the Commission did not agree.

Finally, SCML submitted that its reports to the Commission should take place annually, rather than six-monthly as the Auckland programme provides. The Commission was comfortable with this change, and noted that the proposal generated no opposition from submitters.

PGIP

PGF submitted that “rummaging in handbags” be reinstated as a general indicator. SCML rejected the proposal as feedback from its staff indicated that this was not a sufficiently reliable measure. The Secretary did not oppose the removal of this indicator.

The Commission accepted the submissions by SCML and the Secretary.

Section 5 of the PGIPs provides for SCML to review GOI files monthly during the period of investigation, and for a formal 12 week review. The equivalent section for Auckland provides for fortnightly reviews, with formal reviews at 12 and 24 week intervals. SCML submitted that fortnightly reviews are not practical, are time-consuming and often unnecessary, and in any event, serious GOI files are reviewed more frequently.

PGF submitted that fortnightly reviews should be retained, while the Secretary submitted that fortnightly reviews may not be appropriate, but he questioned the removal of the 24 week review.

In response SCML submitted that a formal 24 week review is unnecessary because files can be reopened at any time after the 12 week review as indicated by the sentence:

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 emerges.

SCML proposed to amend section five to state:

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.
- Formal 12 week review.

The Commission accepted SCML's proposed amendment to section five. While regular reviews of GOI files is of course important, the Commission recognised that a degree of flexibility is also appropriate as some files will require close oversight, with frequent reviews, while others less so. It is a matter of balance for SCML's staff. The Commission therefore saw no need to undertake formal fortnightly or 24 week reviews in an environment where SCML can and will review files in accordance with need.

Second iteration

50. Following the Commission's consideration of the HRPs, it communicated its initial findings to SCML and invited it to submit amended documents for further Commission consideration. SCML did so, together with an explanatory document of the key changes it made.
51. SKYCITY submitted that it "adopted almost all the Commission's suggested revisions to the draft documents." However "the one area where SKYCITY [did] not adopt the Commission's suggestion concern[ed] the provision of both time out and limited play components on the agreed limitation programme for all customers, not just VIP."

2.1.1 – Gambling Limitation

SCML submitted that it did not adopt the Commission's suggestion that both time out and limited play options be included in the Hamilton and Queenstown HRPs, and that these options should be available to all patrons (not just VIPs).

Limited Play

52. SCML submitted that it would not be practical from an operational perspective if limited play was offered at the Hamilton and Queenstown casinos. The limited play option at the Auckland casino has been neither effective nor popular with customers, and only three VIP patrons took this option between 2007 and 2009. Further, all three patrons

subsequently breached their agreements. By comparison, 25 customers took the time out option in this period, and this was beneficial for them all.

53. SCML further submitted that the enforcement and monitoring of even a small number of VIP limited play agreements is very challenging as staff are obligated to check customers are playing for no more than the maximum number of hours per session, and on no more than the maximum number of days per week that they specified in their agreement. A situation where larger numbers of general customers (being non-VIPs) are on limited play agreements would be virtually unenforceable.
54. SCML stated that while the Hamilton and Queenstown casinos have smaller customer numbers than Auckland, they have commensurately smaller staff numbers to monitor customers, and many of its front-line staff have combined functions making the monitoring of limitation agreements more difficult.

Time out for VIPs only

55. SCML also submitted that the agreed limitation programme should not be extended beyond its VIP customers. In 2008, it evaluated the programme for Auckland and specifically considered the question of expanding the programme to all customers. It concluded that the programme should not be expanded for the following reasons:
- The Gambling Helpline, which SKYCITY Auckland consulted as part of the evaluation, identified the importance of staff being able to determine if a limitation agreement would be suitable for a customer as being critical to the success of the initiative. Concerns about widening the programme to all customers centred on its ability to assess, *en masse*, customers' risk levels and therefore their suitability for a limitation agreement, without the kind of relationships and knowledge of play history that it has with its VIP customers. Because a limitation programme is an early intervention tool, it is important that staff can be reasonably certain that the initiative is appropriate for a customer and that they are not in fact experiencing harm and would, therefore, be better served by an exclusion order.
 - VIP players are typically frequent players and therefore more known and easily identifiable to staff. Staff can therefore more easily assess VIP customers' suitability for a time out agreement than they could for general customers.
 - Concerns were raised in the evaluation that the time out option could become a soft alternative for exclusion if it was available to all customers without the necessary suitability considerations by staff.

- The inherent difficulty in assessing general customers' suitability for a time out agreement is cause not to offer such programmes to customers other than VIPs.
 - Enforcement of time out agreements for VIPs is easier for security and surveillance staff because of the smaller number of players on such agreements. Front-line staff, who are more familiar with VIP customers compared with general customers and are more likely to be aware of which customers are on time out agreements, also provide an additional enforcement check.
 - At the Hamilton or Queenstown casinos, most VIPs prefer to play on the main gaming floor so enforcing time out agreements, even for VIP customers, would be more challenging than at Auckland, where VIPs usually frequent dedicated VIP gaming rooms.
56. The Commission's expectation when it completed its review of the programme for the Auckland casino was that both limitation options would be available at all casinos – initially for VIPs, but subsequently to all gaming patrons. When it first considered this issue for Hamilton and Queenstown, it saw no reason to deviate from this approach. However, upon reflection and with the benefit of additional submissions and data from SKYCITY, the Commission was persuaded that, for now, the Hamilton and Queenstown casinos need not offer the limited play option to VIPs, nor any form of Agreed Limitation to general (non-VIP) customers. The Commission reached this decision for two principle reasons. First, as the number of patrons at the Auckland casino who activated the limited play option over a two year period was very low, the Commission considered that there was little point in requiring SCML to deploy it at the Hamilton and Queenstown casinos simply to make their obligations uniform with Auckland's. The Commission wants the HRPs to be of value and to assist patrons. If the limited play option is not doing that at this stage, there is no point including it.
57. The Commission also noted that the Auckland casino is many times larger than the Hamilton and Queenstown casinos combined, so if the demand at Auckland is very low, there is likely to be virtually no demand at the Hamilton and Queenstown casinos.
58. Secondly, the Commission accepted SCML's submission regarding the workability of the limited play option. The Auckland casino has separate VIP areas where the majority of its VIP patrons play. They are generally known by SCML's VIP staff and can be monitored accordingly. VIP patrons at the Hamilton and Queenstown casinos would be largely indistinguishable from regular patrons so overseeing them would have significant challenges, despite the smaller sizes of those casinos.

59. As such the Commission was satisfied that, for now, the limitation programmes at Hamilton and Queenstown can be restricted to a time out option for VIP customers only. However, the Commission wants to make it plain to SCML, and other casino operators, that, in time, it expects each casino to expand its limitation programmes beyond the time out option for VIPs. The Commission expects that, in time, an expanded limitation programme will be quite feasible – particularly with improvements in systems and as staff and patrons become more familiar with such programmes.
60. The Commission also noted that condition 27 of SCML’s operator’s licence provides that SCML may voluntarily improve its HRPs. If SCML sees value in including a limited play option before these programmes are next reviewed, it can do so.

2.6.1 – Safe Gambling Environment – Third Party Loans for Financial Gain

The Commission noted that SCML did not include five paragraphs from this section that were in the Auckland HRP. SCML noted the error and re-included them.

2.9 – Learning and development

The Hamilton and Queenstown HRPs provided that all information or observations should be directed to “host responsibility”, as was the case for the Auckland Programme. However the Commission noted that there is a significant difference between the Auckland casino and the Hamilton and Queenstown casinos – the Auckland casino has a dedicated host responsibility team, whereas the others do not.

Staff at the Hamilton casino who undertake host responsibility functions also undertake security and surveillance functions, while staff at the Queenstown casino undertake a variety of functions, which is unsurprising given the very small size of that casino.

SCML therefore amended the “Overview of staff roles” section to clarify the host responsibility functions undertaken at each casino. However the Commission was of the view that further clarification was required as it wanted to ensure that the necessary assessments are undertaken on patrons who may be potential problem gamblers, and that these patrons do not “slip between the cracks” in any way due to staff conducting functions other than host responsibility.

As the assessment, identification and assistance of problem gamblers is the primary purpose of the HRPs, the Commission considered it vital that these functions be clarified so that this goal can be achieved.



Third Iteration

61. Following the Commission's second consideration of the HRPs, it communicated its findings to SCML and invited it to submit amended HRPs for further consideration. SCML did so, together with an explanatory document of the key changes it made.
62. SCML submitted that it adopted almost all of the changes raised by the Commission.

2.0 – Harm minimisation and prevention components

63. SCML submitted that:
- It added a new section called "Roles and Responsibilities" to clarify further what roles in each business are responsible for undertaking the host responsibility obligations described in the HRPs and PGIPs.
 - The new section explains reporting arrangements and clarifies responsibilities. References to "security and surveillance" in the Queenstown HRP refer to staff in security and surveillance whose roles encompass host responsibility functions. In Hamilton's HRP, the term "host responsibility" is used because this is how the function is referred to by Hamilton staff. The function is undertaken by the Manager of Security, Surveillance and Host Responsibility.

2.7 – Responsible marketing

64. SCML submitted that the sign-off process for responsible marketing, at section 2.7, has been clarified to reflect the current practice whereby host responsibility issues associated with marketing initiatives are considered at the individual casino, but final sign-off is by the regulatory and legal teams at SKYCITY's corporate office in Auckland.

Learning and development

65. SCML submitted that the "Host Responsibility" sections of both HRPs have been amended to clarify where the central repository for problem gambling related information about customers lies.

PGIP – Staff roles

66. SCML submitted that references to the role of host responsibility throughout both documents have been amended where required in accordance with the new "Roles and Responsibilities" section.

Further iterations

67. Following the submission of the third draft, the Commission and SCML liaised over a number of amendments which were subsequently resolved.

Conclusion

68. The Commission specifies the HRPs attached to this decision for the Hamilton and Queenstown casinos (including the Problem Gambler Identification Policies annexed to and forming part of the HRPs). These documents shall take effect from **1 June 2012**, replacing SCML's HRPs dated 1 December 2003 for both casinos. SCML is required to report next to the Commission in accordance with condition 29 and section 3 of the HRPs by **1 June 2013** (12 months from the date of this decision).



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

24 May 2012



SKYCITY Hamilton

**Host Responsibility
Programme**

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Appendix A – Current Host Responsibility Resources for Customers

Appendix B - Identification Policy

1.0 Introduction

Approval Effective date: 1 June 2012

Manager:

Peter Treacy
General Counsel

Arthur Pitcher
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 Hamilton 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 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

- 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
- 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 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 & 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's 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
- Agreed Limitation

The following SOPs relate to the Problem Gambler Identification Policy.

- Information Collection and Collation
- 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 a period of at least one year 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 self-exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. SKYCITY may also impose exclusion after serious one-off incidents where an offer of self-exclusion has been refused.

Approaches to customers Only Level 3 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.
- 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.
- 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 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.
- 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 the Loyalty programme all Excluded and Trespassed customers and customers formally requested to leave the premises.

The SKYCITY Hamilton Security 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 the account is deactivated;
- Forward any surrendered Loyalty card(s) to the loyalty desk.

Host Responsibility must:

- Deactivate Excluded cardholders' accounts;
- Deactivate the accounts of cardholders who have been trespassed or formally requested to leave the premises;
- 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 Loyalty staff member. Having confirmed that the customer has been Excluded, Trespassed or formally requested to leave, Loyalty 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 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 provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
 - SKYCITY Hamilton maintains an effective Responsible Service of Alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol.
 - All SKYCITY Hamilton employees, temporary and contract staff complete the Responsible Service of Alcohol training programme during induction as part of the Host Responsibility Level 1 training programme, including recognition of excessive alcohol consumption traits.¹
 - SKYCITY Hamilton takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
 - SKYCITY Hamilton takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
-

¹ This provision includes those staff employed on a casual basis.

Approach

- Any customer who appears under the age of 25 is asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, the customer is not served or supplied with any alcohol.
 - Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of staff of similar social/ethnic background to the customers to assist in explaining the programme to customers when required.
 - No person who appears intoxicated is 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, without referral to a more senior employee.
 - At all times, when liquor is sold or supplied to members of the public, there is a manager or managers on duty who hold current General Managers Certificates under the Sale of Liquor Act 1989.
 - When appropriate, SKYCITY Hamilton controls the hours of service and locations from which beverages are served.
 - No complimentary alcoholic drinks will be supplied to customers participating in gaming except at the discretion of a Gaming Supervisor or Host.² This is not intended to prohibit normal complimentary Food and Beverage Service for customers, and does not require a customer to participate in gaming activity as a condition of service.
 - Customers contracting to use any meeting room, banquet or out-catering facilities must agree to abide by the SKYCITY Hamilton Responsible Service of Alcohol Programme and procedures regarding responsible service of alcohol.
-

² The discretion to serve drinks will only be exercised where the Gaming Supervisor or Host is satisfied that the customer is not intoxicated.

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 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 under-age 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).

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.

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

Any SKYCITY Hamilton staff member has the authority to approach suspected under-age 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 behave 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

Approach The VIP Agreed Limitation Programme, referred to as 'Agreed Limitation', is a harm minimisation initiative for VIP customers. It is available on request to all VIP customers. SKYCITY Hamilton 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 re-assessed. 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.

Limitation Programme 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 all SKYCITY casinos 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 information 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) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is displayed 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:

'26(g) 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, 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 appropriate channels. They will include:
 - 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.

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.
- 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.
- 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.

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 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.
 - Have opportunities to participate in partnership projects on key initiatives where appropriate.

SKYCITY Hamilton currently convenes a quarterly problem gambling liaison meeting to discuss host responsibility issues. These issues relate primarily to operational issues, for example, referrals and exclusions, etc. It is attended by DIA and local stakeholders such as Hauora Waikato, Pacific People’s Addiction Services, Problem Gambling Foundation (including PGF Asian Services), Salvation Army Oasis Centre, and Police Liquor Licensing.

SKYCITY Hamilton will work with class 4 organisations to maximise the effectiveness of their host responsibility programmes.

SKYCITY Hamilton also conducts other engagement activities on a routine basis, for example, hosting site visits from problem gambling service providers.

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 clearly are 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 develop an Undesirable Behaviour SOP 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 SOP.
- 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 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 (ie 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.

2.7 Responsible marketing

Legislation, 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 in Hamilton 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, website SKYCITY ensures that:

- Host Responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of SKYCITY Hamilton 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.

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 has a Host Responsibility section on its website.

Display of game rules, permissible bets, 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 Gambling 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, 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, the Area Manager will explain this and can provide a "How to Play" brochure.

Information Requests By Customers

Customers wishing to seek further clarification of game rules will be shown where on the main gaming floor copies of game rules are available.

Information on Gambling Activity

Loyalty card players will be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

SKYCITY will also work to develop systems to enable it to provide information to customers who are not loyalty card players, at their request, 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 records, collates and analyses all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers. It also records interactions and interventions they undertake themselves. The information is used to undertake an assessment of risk and harm. 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 is 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 classroom-based training within a reasonable timeframe of commencement (approximately three 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;
- Awareness of employee gambling-related harm.

For all staff in direct contact with customers, SKYCITY will work to supplement this classroom-based training by ensuring that these staff also complete a self-guided workbook with a practical component to be completed within two months of initial classroom based training. Follow up recall testing will be undertaken within 6-8 weeks of completing the workbook. There will also be refresher training as noted below.

Training for staff in direct contact with customers will be further supplemented by on-the-job coaching and support.

Induction training will generally be classroom based, with the exception of casual staff,³ for whom a self-guided learning module has been developed.

Training for Supervisors (Level 2)

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

- Identification of problem gamblers;
- Initial action with respect to customers requesting problem gambling assistance; and
- Identification and intervention with respect to excessive alcohol consumption.

Advanced Training (Level 3)

Advanced training (eight hours), supplementary to induction training, is provided for selected senior employees who may be expected to deliver interventions to customers. For frontline staff, this includes supervisors and managers. It also involves other senior employees throughout the Hamilton business who might be expected to deliver interventions to customers.

This training includes both theoretical and practical components. The training includes:

- 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;
- Awareness of employee gambling-related harm.

³ A casual staff member is an employee who works on a basis that is intermittent or irregular on an 'as required' basis. Casual employees are not rostered to work regular shifts.

Refresher Training

SKYCITY Hamilton provides department-based/site-wide refresher training on an ongoing basis. Refresher training is available to all staff at SKYCITY. Refresher training is provided when a learning and development need is identified or requested, and for those who fail knowledge recall tests.

SKYCITY Hamilton will provide RSA refresher training for frontline bar staff. Where appropriate SKYCITY Hamilton will work with external agencies to develop this training.

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.

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;
- 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 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;
- 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 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. The first report will be provided 12 months after the Programme is notified by the Commission.

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. For its first report, SKYCITY will agree with the Commission on the data available to be presented (given that some of the measures specified below will require SKYCITY to collect new information).
- 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 DIA and other meetings held as required.
- Proposed improvements to the Programme.

Gambling Related Measures	Source of data	Frequency
• Number of customers about whom there have been observations.	SKYCITY	Annual
• Number of indicators reported to Host Responsibility.	SKYCITY	Annual
• Number of approaches to SKYCITY by third parties.	SKYCITY	Annual
• 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.	SKYCITY	Annual
• Number of customers on incident spreadsheet	SKYCITY	Annual
• Number of GOI files by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age • Preferred mode of gambling (tables/EGMs). 	SKYCITY	Annual
• Number of approaches to customers to offer information about self-exclusion.	SKYCITY	Annual
• Number of exclusions by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age • Preferred mode of gambling • Prompted by third party disclosures • Exclusion type (self/SKYCITY) • Following re-entry. 	SKYCITY	Annual
• Number of customers participating in Multi-site Exclusions.	SKYCITY	Annual
• Number of customers participating in Agreed Limitation programme.	SKYCITY	Annual
• Number of Excluded customers agreeing to be contacted by help services on exclusion form.	SKYCITY	Annual
• Number of breaches of exclusion by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age 	SKYCITY	Annual
• Number of successful and unsuccessful applications to re-enter following exclusion.	SKYCITY	Annual
• The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff).	SKYCITY	Annual
• Number of persons trespassed or required to leave for making loans for financial gain.	SKYCITY	Annual
Measures relating to Responsible Consumption of Alcohol		
• Number of "Under the Influence" (UTI) incidents (internal report).	SKYCITY	Annual
• Number of Police contacts citing SKYCITY as venue where their last drink was served.	Police Alcolink database	Annual

Measures relating to Staff Training		
<ul style="list-style-type: none"> • HR1 courses • HR2 courses • HR3 courses • Refresher training • Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level training. 	SKYCITY	Annual
<ul style="list-style-type: none"> • Staff recall of knowledge and behaviours related to Host Responsibility and associated policies and procedures. 	Course Evaluations	Annual
<ul style="list-style-type: none"> • Staff perceptions of the effectiveness of training. 	Course Evaluations	Annual
Other Programme activity and compliance-related measures		
<ul style="list-style-type: none"> • Number of internal and external underage incidents. 	SKYCITY	Annual
<ul style="list-style-type: none"> • Number of unattended children. 	SKYCITY	Annual
<ul style="list-style-type: none"> • Number of Requests to Leave the Premises (RTLPs). 	SKYCITY	Annual

Appendix A – Current Host Responsibility Resources for Customers (as at May 2012)

“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 8 different languages: Chinese, English, Korean, Maori, Samoan and Tongan. 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 and English.

“What are the odds?” – brochure
This brochure provides an overview of gaming machines, player returns, and the operation of the machines. It also provides the customer with referral information to the “Helping Hand” brochure.

“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 English, Korean and Chinese.

“Responsible Service of Alcohol Policy” – poster
The poster outlines the SKYCITY Responsible Service of Alcohol Policy for customers. This includes items such as when service will be slowed and stopped; when gaming service will be stopped; sale of alcohol age; provision of food; alternative transport options.

“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.

“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.

“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 English, Korean and Chinese.

“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



Host Responsibility

Problem Gambler Identification Policy

(Gambling Act 2003, sections 308-311)

Problem Gambler Identification Policy

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

Objective

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Gambling Act 2003 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 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 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 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;
- 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

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 status and the urgency of their situation.

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 likely to 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;
- 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, \$300+ 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, \$500+ 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 e.g. meals; rushing when leaving machine; staying after friends/family leave;

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;
- Possessiveness of particular machines or spots at tables (e.g., 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 e.g. clothing or personal hygiene, over time;
- Family/friends seeking out or enquiring about a customer;
- Falling asleep at the machine or table;
- Claims of malfunction of gaming machines or gaming errors;
- High consumption of alcohol while gambling (for example, demanding drinks);
- Interaction with a known or suspected loan shark;
- Unattended children;
- Breach of an Agreed Limitation agreement;
- 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;
- Borrowing money including begging;
- Not having sufficient money to exit car park;
- 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 EGM 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 EGMs than with other forms of casino gambling;
- Electronic data gathering from EGMs 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;
- interviews with customers or staff.

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.
- 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.
- 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, whether from customers or third parties, must be recorded and sent to Host Responsibility 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 by the supervisor/manager and sent through to Host Responsibility. The reported observations form part of the body of information upon which assessments of problem gambling are to be made.

CUSTOMER DATA INCLUDING LOYALTY

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 e.g. car park use.
- Visitation frequency.

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 players' 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.

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, e.g. probation officer, general practitioner, 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 (e.g., who may be friend or relative of the inquirer). Where a third party appears to express general

concern about a customer, staff will ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this will be recorded by Host Responsibility. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via Loyalty card use, if available or feasible) is undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. The action is logged and sent through to Host Responsibility, and a Gambler of Interest (GOI) file is opened, and an investigation is undertaken.

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 will be treated on an urgent basis. The third party is referred to Host Responsibility or Security. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via Loyalty card use, if available or feasible) is undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, SKYCITY shall also provide to the customer problem gambler information, including exclusion options. The action is logged and sent through to Host Responsibility, and a GOI file is opened, and an investigation is undertaken.

All third party information should be corroborated as part of an internal investigation. The Exclusion SOP outlines the specific steps taken by SKYCITY Hamilton 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. All such information must be recorded and sent to Host Responsibility.

Staff interviews: During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm. This information must be recorded and sent through to Host Responsibility.

Section Four - Identification

Section 2 highlights the indicators that are taken into account in identifying whether a customer may be at risk, and the magnitude of that risk.

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 assess whether a customer is a problem gambler, ie whether his or her gambling is causing harm, or is likely to cause harm, to the customer or others. SKYCITY will make this determination based on information of actual harm, or by inferring (using indicators) that harm is occurring, has occurred, or likely to occur.

Depending on the perceived severity and urgency of a situation, SKYCITY provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. If a customer is identified as a problem gambler, SKYCITY's legal obligations under sections 309-311 of the Gambling Act 2003 are engaged.

Obligation to Identify

The assessment by SKYCITY whether a customer is a problem gambler must be made in good faith, on the balance of probabilities, 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 Host Responsibility.

When a disclosure or observation is reported to Host Responsibility, Host Responsibility collates and reviews 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 risk and harm assessment based on the information collated. This assessment is dynamic in nature as customers may move up and down a continuum of harm, but recognises that interventions should be provided when harm is present, suspected, or may occur in the near future. The indicators of harm along with other relevant information are weighed up and considered.

A variety of different types of information is used when undertaking a risk and harm 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 assessment that a customer is a problem gambler, with SKYCITY taking prompt steps to assist any person who admits to having a gambling problem, or requests assistance to control his or her gambling.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler and already subject to significant gambling-related harm.

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 assessment that the case is urgent and that the customer requires immediate assistance. 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:

- (a) if it has not done so already, open a GOI file;
- (b) 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 collate, analyse and electronically record all information relating to indicators of harm noted by frontline staff, supervisors and managers. Host Responsibility also record third party disclosures, interactions and interventions undertaken in relation to a customer by frontline staff, supervisors and managers.

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, having analysed information relating to a customer in accordance with Section 4, Host Responsibility considers there is evidence that harm is occurring, has occurred or is likely to occur;
- a third party disclosure is made in relation to a customer's gambling;
- 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;
- 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
- Formal 12 week review

When information becomes available or is obtained, a re-assessment of risk and harm will 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 reassessment of risk and harm will be undertaken, and monitoring will continue as part of the customer information review process.

Section Six – Review

The Problem Gambler Identification Policy will be measured and monitored as part of the Hamilton 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.



SKYCITY
QUEENSTOWN CASINO

SKYCITY Queenstown

**Host Responsibility
Programme**

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Appendix A – Current Host Responsibility Resources for Customers

Appendix B - Identification Policy

1.0 Introduction

Approval Effective date: 1 June 2012

Manager:

Peter Treacy
General Counsel

Michelle Baillie
General Manager – SKYCITY Queenstown

1.1 Statement of position

Statement of position	<p>SKYCITY is committed to providing a fun and safe environment for all customers and staff.</p> <p>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.</p> <p>SKYCITY Queenstown intends this Programme to be a usable document for all staff which clearly sets out its obligations with respect to harm minimisation and prevention.</p>
Compliance with legal obligations	<p>The Programme has been developed by SKYCITY Queenstown and addresses the host responsibility conditions in the Casino Operator’s Licence held by SKYCITY Casino Management Limited that relate to the SKYCITY Queenstown casino.</p> <p>Standard Operating Procedures (SOPs) developed by SKYCITY shall be consistent with and impose no lesser obligations than provided in the Act, regulations, licence conditions or this Programme.</p>
SKYCITY Code of Business Practice	<p>The Programme contributes to SKYCITY Queenstown’s compliance with the SKYCITY Code of Business Practice.</p>

1.2 Programme objectives

Objectives The principal objectives of the SKYCITY Queenstown 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.
- Facilitating responsible gambling.

SKYCITY Queenstown 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
- Gambling limitation

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

Roles and responsibilities

Due to the relatively small scale of SKYCITY Queenstown's operations, the casino does not have a dedicated Host Responsibility team. The Host Responsibility function is managed by the Security & Surveillance Manager. Reporting to this role are two Security & Surveillance Shift Managers. All three roles are 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 Shift Manager, as designated by the General Manager.

References in SKYCITY Queenstown'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 Manager.

2.1 Policies and procedures

Approach

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of SKYCITY Queenstown's 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
- Agreed Limitation

The following SOPs relate to the Problem Gambler Identification Policy.

- Information Collection and Collation
 - Analysis and Intervention
-

2.1.1 Exclusion

Introduction SKYCITY offers two types of exclusions:

- Self Exclusion; and
- SKYCITY Exclusion.

SKYCITY Queenstown provides the facility for Self Exclusion of customers from the gaming areas of all SKYCITY sites for a period of at least one year 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 self-exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. SKYCITY may also impose exclusion after serious one-off incidents where an offer of self-exclusion has been refused.

Approaches to customers Only appropriately trained staff may undertake exclusions with customers. This is generally Security & Surveillance 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 and when available.
- Provides support to Excluded customers through provision of materials from problem gambling counselling service providers, and contact details.
- For Self Exclusion, provides Questions and Answers in appropriate languages (if available).

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.
- 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 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.
- 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 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.

Loyalty Card Holders

SKYCITY Queenstown must remove from the Loyalty programme all Excluded and Trespassed customers and customers formally requested to leave the premises.

The SKYCITY Queenstown Security & Surveillance staff member responsible for the administration of the exclusion and trespass records must:

- Take the customer to the Cash Desk prior to conducting their exclusion to redeem any loyalty points.
- Immediately go in to the customer's action account and deactivate the card number.
- Make a comment in the customer's account advising of the date and time-frame of the exclusion.
- Send a list of loyalty member customers who have been excluded to the Host Responsibility Department in Auckland as required.
- 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 Responsible Service of Alcohol Programme is designed to ensure customers enjoy an environment that is safe and enjoyable. A key component is the SKYCITY Queenstown 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 Queenstown programme regarding the responsible service of alcohol:

- SKYCITY Queenstown provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- SKYCITY Queenstown maintains an effective Responsible Service of Alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol.
- All SKYCITY Queenstown employees¹ complete the Responsible Service of Alcohol training programme during induction as part of the Host Responsibility Level 1 training programme, including recognition of excessive alcohol consumption traits.
- SKYCITY Queenstown takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- SKYCITY Queenstown takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.

¹ This does not include staff employed on a casual or temporary basis, in which case they receive a briefing about the training material from a Manager or Supervisor. Note that casual and temporary staff are typically not frequently employed by SKYCITY Queenstown.

Approach

- Any customer who appears under the age of 25 is asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, the customer is not served or supplied with any alcohol.
 - Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption.
 - No person who appears intoxicated is 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, without referral to a more senior employee.
 - At all times, when liquor is sold or supplied to members of the public, there is a manager or managers on duty who hold current General Managers Certificates under the Sale of Liquor Act 1989.
 - When appropriate, SKYCITY Queenstown controls the hours of service and locations from which beverages are served.
 - No complimentary alcoholic drinks will be supplied to customers participating in gaming except at the discretion of a Gaming Supervisor or Host.² This is not intended to prohibit normal complimentary Food and Beverage Service for customers, and does not require a customer to participate in gaming activity as a condition of service.
 - Customers contracting to use any meeting room, banquet or out-catering facilities must agree to abide by the SKYCITY Queenstown Responsible Service of Alcohol Programme and procedures regarding responsible service of alcohol.
-

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 takes active steps to prevent children being left on its premises 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, Security & Surveillance must be notified to follow up potential problem gambling issues.

² The discretion to serve drinks will only be exercised where the Gaming Supervisor or Host is satisfied that the customer is not intoxicated.

2.1.4 Underage persons

Background SKYCITY is committed to keeping minors out of the gambling area. SKYCITY will rigorously enforce the prevention of under-age gambling in its casinos.

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

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.

Training for SKYCITY Queenstown Security and Gaming staff must include the need to be particularly vigilant for the presence of under-age persons.

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

2.1.5 Standards of dress and behaviour

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

Dress Code SKYCITY Queenstown 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's Casino:

- torn clothes;
- gang patches or other insignias;
- offensive logos; dirty clothes or footwear; or
- hats, caps and sunglasses may not be worn when playing Table Games (except for Texas Hold'em Poker or if required for medical reasons).

Behavioural Standards

If a customer is detected:

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

then SKYCITY Queenstown 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

Approach

The VIP Agreed Limitation Programme, referred to as 'Agreed Limitation', is a harm minimisation initiative for VIP customers. It is available on request to all VIP customers. SKYCITY Queenstown 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 re-assessed. 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.

Limitation Programme

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 all SKYCITY casinos 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 Queenstown's gambling areas.

This information is also supplemented by the SKYCITY Queenstown website (www.skycityqueenstown.co.nz) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is displayed 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's customer base.

A summary of SKYCITY Queenstown'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 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:

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

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

SKYCITY Queenstown 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 through appropriate channels. They will include:
- 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 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.

Policies and procedures

- Prohibit staff from gambling at any SKYCITY owned or operated casino.
- Prohibit staff from gambling at Lasseters Wharf Casino.
- Prohibit access to online gambling sites by staff while on SKYCITY premises.
- 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 on job application forms).
- Decline applications from those who are identified as problem gamblers either through their application, or disclosure of relevant indicators (as set out in the SKYCITY Identification Policy) during the recruitment process and provide appropriate information, advice and assistance.
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Queenstown 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 problem gambling treatment provider;
 - Confidentiality; and
 - Wherever possible SKYCITY Queenstown will involve problem gambling counsellors in staff induction training about the signs of problem gambling among staff and customers.

2.4 Stakeholder engagement

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

Approach SKYCITY Queenstown will continue to facilitate opportunities for engagement to ensure local stakeholders:

- Understand and are aware of SKYCITY Queenstown's 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's Host Responsibility Programme and harm prevention and minimisation initiatives.
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

A key stakeholder initiative is SKYCITY Queenstown's participation in and support of the multi-site exclusion process. Other participants include Lasseters Wharf Casino and local Class 4 venues.

SKYCITY Queenstown will convene quarterly problem gambling liaison meetings to discuss host responsibility issues. It will invite local stakeholders such as the DIA, the Police, the Salvation Army Oasis Centre and the Wakatipu Casino Liaison Group.

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;
- 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 possible;
- 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 prior to making applications to the Commission. 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 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 information is available 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 develop an Undesirable Behaviour SOP 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 Undesirable Behaviour SOP.
 - 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 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 (ie 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.
-

2.7 Responsible marketing

Legislation, 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 will not specifically target local residents when advertising gaming products.

SKYCITY Queenstown 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 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 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, website SKYCITY ensures that:

- Host responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of SKYCITY Queenstown 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.
- After hours callers to SKYCITY Queenstown can be diverted to the Gambling Helpline.

SKYCITY Queenstown will make available a 'responsible gaming' brochure, developed as part of SKYCITY Auckland's Host Responsibility Programme, and intended to assist in reducing the tendency of patrons to be subject to incorrect 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 has established a Host Responsibility section on its website.

Display of game rules, permissible bets, 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 Gambling 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, 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" leaflet, 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, a trained gaming employee will explain this and can provide a "How to Play" brochure.

Information Requests By Customers

Customers wishing to seek further clarification of game rules will be shown where on the main gaming floor copies of game rules are available.

Information on Gambling Activity

Loyalty card players will be provided, on request, with information on their gambling activity, including, where possible, the number and length of their gambling sessions and their gambling expenditure.

SKYCITY will also work to develop systems to enable it to provide information to customers who are not loyalty card players, at their request, 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 is committed to developing staff awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. SKYCITY Queenstown 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 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 the Security & Surveillance Shift Manager (as designated by the General Manager). Supervisors and managers are also responsible for providing additional information to the Security & Surveillance Shift Manager to assist with the ongoing monitoring of, and interaction with, the customer.

Host Responsibility: The Security & Surveillance Shift Manager (as designated by the General Manager) records, collates, and analyses 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 an assessment of risk and harm. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken. This may include meeting with customers. Host Responsibility is 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;
- Awareness of employee gambling-related harm.

For all staff in direct contact with customers, SKYCITY will work to supplement this classroom-based training by ensuring that these staff also complete a self-guided workbook with a practical component to be completed within two months of initial classroom based training. Follow up recall testing will be undertaken within 6-8 weeks of completing the workbook. There will also be refresher training as noted below.

Training for staff in direct contact with customers will be further supplemented by on-the-job coaching and support.

Induction training will generally be classroom based, with the exception of casual staff,³ for whom a self-guided learning module has been developed.

Training for Supervisors (Level 2)

Supervisors from Gaming, Food & Beverage, and Security & Surveillance must participate in supplementary Level 2 training (two hours). 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;
- Initial action with respect to customers requesting problem gambling assistance; and
- Identification and intervention with respect to responsible service of alcohol.

Advanced Training (Level 3)

Advanced training (eight hours), 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; and
- Advanced Responsible Service of Alcohol – intervention and slowing service;
- Awareness of employee gambling-related harm.

³ A casual staff member is an employee who works on a basis that is intermittent or irregular on an 'as required' basis. Casual employees are not rostered to work regular shifts.

Refresher Training

SKYCITY Queenstown provides annual refresher training to all staff. Additional refresher training is provided when a learning and development need is identified, and for those who fail knowledge recall tests.

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

Selected senior Gaming and Security Managers are trained to respond to customers who are at risk of suicide. This training is provided as part of the advanced Level 3 training.

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, including:

- Internal communications e.g. staff memos;
- Inclusion in business or management processes e.g. staff meetings and key performance indicators;

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;
 - 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 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;
- 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 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 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 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. The first report will be provided 12 months after the Programme is notified by the Commission.

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. For its first report, SKYCITY will agree with the Commission on the data available to be presented (given that some of the measures specified below will require SKYCITY to collect new information).
- 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 DIA and other meetings held as required.
- Proposed improvements to the Programme.

Gambling Related Measures	Source of data	Frequency
• Number of customers about whom there have been observations.	SKYCITY	Annual
• Number of indicators reported to Host Responsibility.	SKYCITY	Annual
• Number of approaches to SKYCITY by third parties.	SKYCITY	Annual
• 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.	SKYCITY	Annual
• Number of customers on incident spreadsheet	SKYCITY	Annual
• Number of GOI files by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age • Preferred mode of gambling (tables/EGMs). 	SKYCITY	Annual
• Number of approaches to customers to offer information about self-exclusion.	SKYCITY	Annual
• Number of exclusions by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age • Preferred mode of gambling • Prompted by third party disclosures • Exclusion type (self/SKYCITY) • Following re-entry. 	SKYCITY	Annual
• Number of customers participating in Multi-site Exclusions.	SKYCITY	Annual
• Number of customers participating in Agreed Limitation programme.	SKYCITY	Annual
• Number of Excluded customers agreeing to be contacted by help services on exclusion form.	SKYCITY	Annual
• Number of breaches of exclusion by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age 	SKYCITY	Annual
• Number of successful and unsuccessful applications to re-enter following exclusion.	SKYCITY	Annual
• The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff).	SKYCITY	Annual
• Number of persons trespassed or required to leave for making loans for financial gain.	SKYCITY	Annual
Measures relating to Responsible Consumption of Alcohol		
• Number of "Under the Influence" (UTI) incidents (internal report).	SKYCITY	Annual
• Number of Police contacts citing SKYCITY as venue where their last drink was served.	Police Alcolink database	Annual

Measures relating to Staff Training		
<ul style="list-style-type: none"> • HR1 courses • HR2 training completed • HR3 training completed • Refresher training • Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level training. 	SKYCITY	Annual
<ul style="list-style-type: none"> • Staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures. 	Course Evaluations	Annual
<ul style="list-style-type: none"> • Staff perceptions of the effectiveness of training. 	Course Evaluations	Annual
Other Programme activity and compliance-related measures		
<ul style="list-style-type: none"> • Number of internal and external underage incidents. 	SKYCITY	Annual
<ul style="list-style-type: none"> • Number of incidents of unattended children. 	SKYCITY	Annual
<ul style="list-style-type: none"> • Number of Requests to Leave the Premises (RTLPs). 	SKYCITY	Annual

Appendix A – Current Host Responsibility Resources for Customers (as at May 2012)

“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 Queenstown provides “Would you like a Helping Hand” - brochures in seven languages: Chinese, English, Hindi, Japanese, Korean, Maori and Thai. 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 A2 and A3 poster versions. The posters provide the Gambling Helpline telephone number and are 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 telephone number and other free problem gambling service contact numbers.

“What are the odds?” – brochure
This brochure provides an overview of gaming machines, player returns, and the operation of the machines. It also provides the customer with referral information to the “Helping Hand” brochure.

“Self-Exclusion at SKYCITY” – brochure
The brochure outlines the self-identified exclusion process. It provides simple information on frequently asked questions with regard to exclusion, including obligations of excluded customers. It also provides the Gambling Helpline telephone number. The brochure is available in Chinese, English, Hindi, Japanese, Korean and Thai.

“Responsible Service of Alcohol Policy” – poster
The poster outlines the SKYCITY Responsible Service of Alcohol Policy for customers. This includes items such as when service will be slowed and stopped; when gaming service will be stopped; sale of alcohol age; provision of food; alternative transport options.

“Why We Can’t Serve You” – tent card
This card provides a summary of the SKYCITY Responsible Service of Alcohol Policy, including a representation of the RSA model. 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.

“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.

“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 brochure is available in Chinese, English, Hindi, Japanese, Korean and Thai.

“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



Host Responsibility

PROBLEM GAMBLER IDENTIFICATION POLICY

(Gambling Act 2003, sections 308-311)

Problem Gambler Identification Policy

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

Objective

The Problem Gambler Identification Policy ("Policy") has been developed pursuant to the Gambling Act 2003 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 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 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 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;
- 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

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 status and the urgency of their situation.

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 likely to 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;
- 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, \$300+ 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, \$500+ 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 e.g. meals; rushing when leaving machine; staying after friends/family leave;

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;
- Possessiveness of particular machines or spots at tables (e.g., 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 e.g. clothing or personal hygiene, over time;
- Family/friends seeking out or enquiring about a customer;
- Falling asleep at the machine or table;
- Claims of malfunction of gaming machines or gaming errors;
- High consumption of alcohol while gambling (for example, demanding drinks);
- Interaction with a known or suspected loan shark;
- Unattended children;
- Breach of an Agreed Limitation agreement;
- 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;
- Borrowing money including begging;
- 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 EGM 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 EGMs than with other forms of casino gambling;
- Electronic data gathering from EGMs 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;
- interviews with customers or staff.

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.
- 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.
- 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, whether from customers or third parties, must be recorded and sent to the Security & Surveillance Shift Manager (as designated by the General Manager) 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 by the Security & Surveillance Shift Manager. The reported observations form part of the body of information upon which assessments of problem gambling are to be made.

CUSTOMER DATA INCLUDING LOYALTY

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
- Visitation frequency.

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.

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, e.g. probation officer, general practitioner, 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 (e.g., who may be friend or relative of the inquirer). Where a third party appears to express general concern about a customer, staff will ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this will be

recorded by the Security & Surveillance Shift Manager. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via Loyalty card use, if available or feasible) is undertaken. If found, further inquiry will be undertaken and the customer may be requested to leave the premises for a period of time. The action is logged and sent through to the Security & Surveillance Shift Manager, and a Gambler of Interest (GOI) file is opened, and an investigation is undertaken.

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 will be treated on an urgent basis. The third party is referred to Host Responsibility. Details are taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via Loyalty card use, if available or feasible) is undertaken. If found, further enquiry will be undertaken and the customer may be requested to leave the premises for a period of time. If requested to leave, SKYCITY shall also provide to the customer problem gambler information, including exclusion options. The action is logged and sent through to the Security & Surveillance Shift Manager, and a GOI file is opened, and an investigation is undertaken.

All third party information should be corroborated as part of an internal investigation. The Exclusion SOP outlines the specific steps taken by SKYCITY Queenstown 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. All such information must be recorded and sent to the Security & Surveillance Shift Manager.

Staff interviews: During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm. This information must be recorded and sent through to the Security & Surveillance Shift Manager.

Section Four - Identification

Section 2 highlights the indicators that are taken into account in identifying whether a customer may be at risk, and the magnitude of that risk.

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 assess whether a customer is a problem gambler, ie whether his or her gambling is causing harm, or is likely to cause harm, to the customer or others. SKYCITY will make this determination based on information of actual harm, or by inferring (using indicators) that harm is occurring, has occurred, or likely to occur.

Depending on the perceived severity and urgency of a situation, SKYCITY provides graduated responses ranging from immediate intervention, advice and discussion to ongoing monitoring. If a customer is identified as a problem gambler, SKYCITY's legal obligations under sections 309-311 of the Gambling Act 2003 are engaged.

Obligation to Identify

The assessment by SKYCITY whether a customer is a problem gambler must be made in good faith, on the balance of probabilities, 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 Security & Surveillance Shift Manager as designated by the General Manager.

When a disclosure or observation is reported to the Security & Surveillance Shift Manager, they 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 inquiries of relevant staff in relation to that customer.

Host Responsibility undertake a risk and harm assessment based on the information collated. This assessment is dynamic in nature as customers may move up and down a continuum of harm, but recognises that interventions should be provided when harm is present, suspected, or may occur in the near future. The indicators of harm along with other relevant information are weighed up and considered.

A variety of different types of information is used when undertaking a risk and harm 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 assessment that a customer is a problem gambler, with SKYCITY taking prompt steps to assist any person who admits to having a gambling problem, or requests assistance to control his or her gambling.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler and already subject to significant gambling-related harm.

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 assessment that the case is urgent and that the customer requires immediate assistance. 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:

- (a) if it has not done so already, open a GOI file;
- (b) 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

The Security & Surveillance Shift Manager as designated by the General Manager collates, analyses and electronically records all information relating to indicators of harm noted by frontline staff, supervisors and managers. They also record third party disclosures, interactions and interventions undertaken in relation to a customer by frontline staff, supervisors and managers.

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 the Security & Surveillance Shift Manager:

- in circumstances where, having analysed information relating to a customer in accordance with Section 4, Security & Surveillance considers there is evidence that harm is occurring, has occurred or is likely to occur;
- a third party disclosure is made in relation to a customer's gambling;
- 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;
- 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
- Formal 12 week review

When information becomes available or is obtained, a re-assessment of risk and harm will 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 reassessment of risk and harm will be undertaken, and monitoring will continue as part of the customer information review process.

Section Six – Review

Review

The Problem Gambler Identification Policy will be measured and monitored as part of the Queenstown 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.