

IN THE MATTER of the Gambling Act 2003

AND the amendment by the Gambling Commission of the Responsible Gambling Programme of SKYCITY Management Limited

BEFORE THE GAMBLING COMMISSION

Members: P Chin (Chief Gambling Commissioner)
K M Ford
M M Lythe
P J Stanley
G L Reeves

Date of Decision: 19 October 2007

Date of Notification of Decision: 3 December 2007

**DECISION
ON THE AMENDMENT BY THE GAMBLING COMMISSION OF THE RESPONSIBLE
GAMBLING PROGRAMME OF SKYCITY MANAGEMENT LIMITED**

Introduction

1. By this decision the Gambling Commission ("**Commission**") amends the Responsible Gambling Programme ("**RGP**") for Auckland casino approved by the Casino Control Authority on 1 December 2003 and approves in its place the amended RGP **attached** to this decision.
2. The approval of the attached RGP for the Auckland casino arises out of a lengthy consultation process, which commenced with the Commission notifying draft replacement licence conditions for SCML. Licence conditions specified by the Commission in its decision dated 27 March 2006 included a non-exhaustive list of what the RGP was required to address for the Auckland casino, this list being a significant enlargement of the content of the existing 2003 Programme. The Commission, in its decision, also established a consultative procedure for the review and amendment of SCML's RGP, no such procedure having been provided previously. That process, and the Commission's implementation of it, is described in greater detail below.
3. The central place of SCML's RGP in the licence conditions specified by the Commission, aligns with some key purposes of the Gambling Act 2003 (the "**Act**"), namely preventing and minimising harm and facilitating responsible gambling. Ultimately, a casino operator's legal responsibilities for preventing and minimising harm arise from provisions of the Act, Regulations and licence conditions. The RGP, a requirement of the licence

conditions, is an important source of the detailed legal obligations of SCML in these respects.

4. Achieving clarity in the RGP of SCML's legal obligations, and the requirements of their effective discharge, was a key objective for the Commission. The need for greater clarity was highlighted for the Commission by two prior events. In the hearing of the Secretary's application to suspend the Dunedin casino licence, submissions were made to the Commission that the casino's obligations were legally limited because of the limited content of that casino's RGP and Identification Policy. Because frequency of visitation and level of expenditure were not included as indicators of gambling harm, it was argued that Christine Keenan was, quite properly, not identified as a problem gambler despite frequent visits to the casino and a long history of substantial losses. The Commission wished to remove the basis for similar arguments in the future by ensuring the adequacy of the Identification Policy and the requirements for its use.
5. The Commission was also mindful of the result of an investigation conducted by the Department of Internal Affairs in relation to a customer at SKYCITY Auckland casino, Patrick Jackson. In that case, the Department concluded that there had been no clear breach of SCML's policies, as their wording arguably permitted the narrow reading contended for by SCML which meant that it was doubtful that there was a clear requirement for action, including in respect of the third party disclosure in that case.
6. Against this background, the Commission wished to ensure that the RGP properly clarifies SCML's obligations to identify and assist problem gamblers, and to offer exclusion procedures. It is for that reason that the Commission specified in its licence review decision of 27 March 2006, that the casino's identification policy was required to be addressed in and form part of its RGP. By this means, the Commission is now in a position to address the adequacy of SCML's Identification Policy, which SCML is required to have by section 308(1) of the Act.
7. More generally, the Commission wished to ensure the RGP clearly expressed SCML's principal obligations in relation to harm prevention and minimisation and the promotion of responsible gambling. In doing so, it has reserved a degree of flexibility for SCML concerning the precise means of meeting its obligations. The RGP is not intended to be an operational straitjacket which particularises every aspect of SCML's operations in relation to the Auckland casino.
8. In this regard, it is pertinent, to record at the outset of this decision that research into the effectiveness of host responsibility interventions is limited. SCML's new RGP undoubtedly represents a new standard compared with existing programmes in New Zealand, and probably Australia. Clearly, however, the RGP will be subject to change

and enhancement over time, as evidence about harm, and how it is best prevented and minimised in a casino context, develops. The reporting requirements in the RGP, and review requirements in licence conditions, are intended to ensure that the RGP, and what it delivers, is regularly considered by SCML, the Commission, and stakeholders going forward.

Process

9. Condition 27 of SCML's operator's licence relating to SKYCITY Auckland casino provides that the Commission will review the Auckland RGP every two years. The Commission is required to consult with interested parties, as appropriate, and amend the RGP as it determines, after giving the Licence Holder the opportunity to comment.
10. As it was obvious from the Commission's decision of 27 March 2006 that substantial changes would be required to the existing RGP, the Commission invited SCML to provide a redraft for consultation and consideration. The Commission received SCML's draft RGP (which SCML headed "Host Responsibility Programme"), for review in April 2007. Potentially interested parties comprising the Secretary for Internal Affairs ("**Secretary**"), the Ministry of Health ("**MoH**"), Problem Gambling Foundation ("**PGF**"), Gambling Helpline ("**GH**"), Te Herenga Waka O Te Ora Whanau ("**Te Herenga**"), The Salvation Army ("**SA**"), and the Centre for Gambling Studies were invited to make, and made, written submissions on the draft RGP.
11. In addition, the Commission retained Dr Paul Delfabbro, Associate Professor at the School of Psychology, University of Adelaide, to provide the Commission with expert advice on the RGP, including, in particular, advice on the identification of problem gamblers. Dr Delfabbro has significant expertise in researching problem gambling, and (working with others) has recently completed for Gambling Research Australia a study on identifying problem gamblers in gambling venues. Dr Delfabbro undertook for the Commission a preliminary review of the draft RGP which was circulated to all parties on 29 June 2007. Dr Delfabbro also attended and participated in the Commission's oral hearing of submissions on 20 July 2004.
12. The Commission convened an oral hearing to hear the parties, with all parties, except Te Herenga, attending. That hearing provided an opportunity for detailed discussion of the draft RGP by parties, which greatly assisted the Commission in its work. Copies of submissions made to the Commission were circulated to all parties in advance of the hearing.


13. Arising out of written and oral submissions and expert advice received by it, the Commission identified certain areas of the draft RGP as potentially requiring material amendment. These are summarised below. Consistent with the requirements of

condition 27, the Commission consulted with the Licence Holder and developed amendments to the RGP on an iterative basis working with the Licence Holder. This approach to the development of changes to the RGP recognised that the RGP is an internal policy document which, if it is to be fully effective, must be "owned" by SCML, and work for it at an operational level. However, the Commission did not lose sight of the fact that the RGP is an important source of legal obligation for the casino operator and that it needed to specify clear legal obligations which the operator would be unlikely to proffer voluntarily. The Commission was assisted by the expert advice of Dr Delfabbro throughout the amendment process.

14. As the draft developed, the Commission also consulted, on two occasions, with the Secretary, because of the Secretary's statutory role in monitoring and auditing the implementation of the RGP and licence conditions. The Commission also consulted with GH, following an enquiry, in relation to section 3 of the RGP relating to reporting, and associated indicators. As other parties had made their position sufficiently clear in written and oral submissions, the Commission did not consider it necessary to undertake supplementary consultation with other parties.
15. Because this decision is the first consideration by the Commission of the adequacy of the content of a RGP and Identification Policy, following its earlier decision to make provision in casino licence conditions for review and amendment of such policies, the process has been an unusually lengthy one. It is expected that the work carried out in this review however will assist reviews of similar policies in the future.

Jurisdiction

16. Condition 24 of SCML's operator's licence relating to Auckland casino specifies the matters which must be included in the RGP for Auckland. Condition 24 provides:
25. The Programme shall be consistent with and impose no lesser requirement than specified in the Act or Regulations. The Programme shall address and not be limited to:
- (a) the provision of information for customers relating to game rules, permissible bets and payment of winning bets pursuant to section 175 of the Act;
 - (b) the provision of signage, brochures and publications, and the effective display and distribution of the same, to inform gamblers of the odds of winning on gaming machines, how to gamble safely, the characteristics of problem gambling and the availability of counselling and other support services;
 - (c) a policy for identifying problem gamblers. This policy 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 actual or potential problem gamblers;
 - (d) the provision of staff training;
 - (e) the provision of exclusion, self-exclusion and limitation programmes;
 - (f) assistance to casino employees with managing the potential for personal problem gambling;
 - (g) recognition of cultural differences amongst gamblers using the Casino, and the need to tailor delivery of host responsibility obligations to maximise effectiveness for customers;
 - (h) guidelines for responsible marketing and advertising of the Casino, including exterior signage, and restriction on jackpot advertising and branding pursuant to Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004;
 - (i) responsible practices in the conduct of promotions and inducements to gamble at the Casino;
 - (j) 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;
 - (k) promotion of the responsible consumption of alcohol, including provision of staff training in responsible service of alcohol;
 - (l) standards of dress and behaviour at the casino;
 - (m) liaison with community service organisations, patrons with gambling problems, and family members of patrons with gambling problems; and
 - (n) such other matters as the Commission may require.
17. The RGP addresses the matters specified in condition 24, many of which, in turn, specify how SCML will implement obligations under the Act and Regulations.
18. In relation to condition 24(c) and (e), 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. Section 308(4) provides as follows:

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.

19. 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. The RGP now specifies how the Licence Holder will exercise its discretion to exclude a problem gambler who has not requested exclusion.

Submissions to the Commission

20. Submissions and Dr Delfabbro's report to the Commission identified the need to amend the RGP in the following areas:
- (a) achievement of greater clarity around outputs/outcomes (Delfabbro, Secretary, GH);
 - (b) alignment of the definitions of harm and problem gambler with the Act (Delfabbro, Secretary, GH, PGF);
 - (c) development of training requirements, particularly for staff in direct contact with customers (Delfabbro, Secretary, SA);
 - (d) supplementing requirements relating to environmental design and marketing materials (Delfabbro, Secretary, MoH, Te Herenga, GH);
 - (e) providing for a safe environment, including minimising the incidence of loan sharking (Secretary, PGF, SA, and Centre for Gambling Studies) and restricting the number of gaming machines permitted to be played at one time (PGF);
 - (f) expanding and clarifying external engagement requirements (Secretary, GH, PGF, SA);
 - (g) specification of reporting requirements and indicators against which performance under the RGP can be monitored and evaluated (PGF, GH, SA, Te Herenga); and
 - (h) recognition in the RGP of the need to address cultural differences when discharging host responsibility obligations, including the development of a powhiri model for host responsibility (Secretary, GH, PGF, Te Herenga).
21. In relation to the identification of problem gamblers, submissions and Dr Delfabbro's report highlighted the need for amendments in the following areas:
- (a) to supplement proposed indicators of problem gambling, in particular by including frequency of visits to the casino and expenditure as indicators (Delfabbro, Secretary, MoH, PGF, SA, Centre for Gambling Studies, Te Herenga);
 - (b) expansion of the use of loyalty data and player tracking so that this is used to screen for problem gamblers as well as to verify identifications made on the basis of behavioural observations (Delfabbro, Secretary, MoH, PGF);

- (c) recognition of veiled disclosures by customers and third parties as a basis for intervention, with particular reference to the Patrick Jackson case (Secretary, GH);
- (d) closer definition of the point at which risk of harm dictates that intervention should occur (Delfabbro, Secretary, MoH, GH);
- (e) more explicit reporting and recording requirements in relation to indicators and interventions undertaken with customers (Secretary, MoH).

Amendments to the RGP

22. At a structural level, the principal change made has been to incorporate into the RGP SKYCITY's Problem Gambler Identification Policy for Auckland casino, which is required under section 308(1). The Commission inserted this requirement into the licence conditions in its decision of 27 March 2006 because it regards the Policy as central to the discharge by the Licence Holder of its host responsibility and harm minimisation obligations, and therefore intrinsically linked to, and appropriately reviewed as part of, the RGP. The initial draft incorporated a summary of the Identification Policy but the Commission, as it intended would be the case in its 27 March 2006 decision, has instead incorporated and reviewed the Identification Policy as part of the RGP.
23. Key substantive amendments to the draft RGP and Identification Policy submitted by SCML are discussed below on a section by section basis.

Section 1.2 – Guiding Principles

24. A number of the principles have been amended, including principles relating to the alignment of business and harm minimisation imperatives, recognition of diversity, and stakeholder relationships.

Section 2.1 – Programme Objectives

25. Dr Delfabbro proposed, with the support of a number of submitters, that the RGP and section 2.1 in particular, would be strengthened by linking stated objectives to measurable outputs. This has been achieved by the amendments to section 2.1 and the insertion of section 3, a new monitoring and reporting section, discussed below.

Section 2.2 – Approach to Host Responsibility (previously called “Host Responsibility Enablers”)

26. A number of changes have been made to this section including the following:

- Amending the definitions of “problem gambler” and “harm” to ensure consistency with the Act.

- Clarifying the interface between the escalation model (which proposes that response escalates with risk of harm) and SKYCITY's legal obligations to identify and assist problem gamblers.
- Clarifying the steps to be taken by SKYCITY in interfacing with customers, and the processes which underpin identification of persons at risk, ie collecting data, analysing and assessing it, and interacting with customers in a way proportional to perceived risk.
- Amendment to customer information resources, to require that the RGP is displayed on the SKYCITY Auckland website.

Section 2.3.1 – Employee gambling-related harm

27. In response to questions raised by the Commission, the Licence Holder has elaborated on and clarified the primary, secondary and tertiary prevention elements of this programme.

Section 2.4 – External stakeholder engagement

28. A number of submitters called for clearer terms of reference for the Auckland Host Responsibility Community Liaison Group, and the need for the RGP to provide for meaningful consultation, including the ability of stakeholders to participate in the development and implementation of the RGP.
29. The RGP now requires the Licence Holder to develop terms of reference for Liaison Group meetings (it is understood this is already underway), and provides that SKYCITY will consider the views of members of the Group in developing and implementing its RGP. SKYCITY will also make available to the Liaison Group a copy of the report provided to the Commission under section 3 of the Programme. The Commission expects to review the terms of reference on its next review of the RGP.

Section 2.5.1 – Environmental design

30. Additional detail has been included, outlining how SKYCITY will implement its commitment to ensure responsible environmental design. This includes, for example, requirements to ensure problem gambling signage, exit points and public telephone facilities are clearly visible, that staff can easily see patrons, and that other non-gambling entertainment options are available.

Section 2.5.2 – Safe gambling environment

31. This section, inserted by the Commission, is new. First, it requires that SKYCITY take all reasonable and practicable steps to ensure a customer plays no more than one gaming

machine at a time (this language is drawn from the South Australian Code which applies to the operation of the SKYCITY Adelaide casino).

32. The second part of section 2.5.2 addresses loan sharking. The RGP requires that the casino not permit loan transactions by third parties for financial gain at the venue (this casts the net more broadly than illegal or oppressive loan activity, more commonly known as "loan sharking"). There is an exception for circumstances approved by the former Casino Control Authority ("CCA") or the Commission. This follows the language of section 15 of the Act, and recognises that there are ATM facilities in the casino venue and a BNZ banking facility, approved previously by the CCA.
33. SKYCITY is required to take "all reasonable steps" to identify persons at the casino offering loans for financial gain, to investigate suspicious behaviour or information from third parties, and to exclude by trespass notice persons who are involved in making such loans. A person who receives such loans must be treated as being at risk of harm, and is to be provided with appropriate advice and assistance including information on exclusion.
34. It is recognised by the Commission that the Secretary may develop supplementary measures to address the potential for crime and criminality in casinos (this possibility is discussed in the Secretary's recent report into activities at Christchurch casino). The Commission considers the provision made by it in the RGP to be an important first step in crystallising the obligations of Licence Holders to provide a safe gambling environment.

Section 2.5.3 – Responsible marketing

35. No major amendments made.

Section 2.5.4 – Provision of information to customers

36. The Commission considers the ability of members of the public to access information about their personal gambling activity to be an important aspect of harm minimisation. This section has been amended to require SKYCITY to provide to loyalty club players, on request, information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.
37. SKYCITY is also required to develop the ability in the future to provide the same information to customers who are not loyalty club players on request. This will be something which the Commission expects to see at the next review.

Section 2.6.1 – Learning and development

38. A number of changes have been made by SKYCITY, in particular to clarify staff roles and learning and development requirements depending on the roles and responsibilities of staff and whether they interface with customers.

39. Level 1 induction training requirements have been supplemented, with permanent staff in direct contact with customers required also to complete a self-guided workbook with a practical component within a month of induction training. Follow-up recall testing is required within six-eight weeks of completing the workbook, and refresher training undertaken if recall testing is not satisfactory.
40. SKYCITY has also elaborated on the content of training for managers and supervisors and advanced training, with specific provision made for coaching and on the job training.

Section 2.6.2 – Identification of problem gamblers

41. As noted above, in the draft RGP submitted by SCML, identification of problem gamblers was addressed both in SCML's RGP and Identification Policy. To avoid conflict and duplication, primary obligations are now in the Identification Policy annexed to the RGP, and are discussed in detail below.

Section 2.6.3 – Exclusion

42. A number of changes to this section have been made by SKYCITY in discussion with the Commission, in particular to clarify when the casino will exercise its discretion under section 309 of the Act to exclude persons from the casino. Where a person does not, when offered, take up self exclusion, SKYCITY is required to exclude the person, whom it will have identified as a problem gambler, unless it considers that the customer can continue to gamble without experiencing harm.
43. Amendments made to this section also clarify arrangements relating to the loyalty card members on exclusion, to ensure, for example, that members are removed from mailing lists.

Section 2.6.4 – Gambling limitation

44. This relates to the Agreed Limitation Programme available to VIP customers. A number of minor amendments have been made to this section to clarify that this Programme is available to all VIP customers on request, and may also be offered, at the casino's initiative, in certain circumstances, it being clear in the RGP that it is not a substitute for the provision of information on the availability of self-exclusion.

Section 2.6.7 – Underage persons

45. This section is amended to provide that any customer who appears under the age of 25 will be asked for verification of identity and proof of age before being permitted to enter the Gambling Area.

Sections 2.6.5, 2.6.6, 2.6.8

46. No changes.

Section 3

47. Amendments to this section are intended to provide a robust monitoring and reporting framework. Reporting requirements are directed towards measurement of the level of activity being undertaken under the RGP, and SCML's compliance with RGP obligations. SKYCITY is asked to comment on perceived effectiveness of the Programme and proposed improvements, but this is clearly a matter to be considered and assessed more broadly, taking into account monitoring data and external information.
48. The Commission has included a number of additional indicators, and clarified reporting requirements in relation to the same, including a requirement to compare with previous data. Reporting against the indicators should provide, amongst other things, a clear picture of whether and the extent to which indicators of problem gambling are being observed by the casino and customers identified as problem gamblers as a consequence. The data will show, for example, how many problem gamblers are self-identified (or identified by third parties), compared with how many the casino identifies either through behavioural observation or review of loyalty data.

Identification Policy

49. As indicated above, as part of its review, the Commission has considered carefully the within-venue identification of problem gamblers, this being a core statutory requirement.
50. Drawing on its experience in relation to the Dunedin casino, the Commission was conscious that the phenomenon of problem gambling does not lend itself to easy prescriptive rules for identification. Rather, it requires the conscientious collection of information enabling the Licence Holder to assess in good faith and in good time whether a customer is a problem gambler as defined in the Act, and to act on that identification.
51. The specification of frequent visitation and high levels of expenditure as indicators of problem gambling were the most controversial. While acknowledging that the combination of frequency of visit and spend per visit are likely to be useful as part of overall identification, SCML resisted their inclusion as strong indicators, and the specification of indicative parameters for frequency and spend (in combination) of concern. Other parties broadly supported inclusion.

52. The Commission considers that it is reasonable for a casino to monitor customer activity for the purposes of harm minimisation and prevention as well as for other purposes such as security and marketing. While frequent visitation and high levels of expenditure do not

necessarily mean that harm is, or is likely to be suffered in all such cases (the Commission acknowledges that harm can be suffered in individual cases when attendances and losses are modest), it is clear that there is a high correlation between attendance and losses and harm. Accordingly, analysis of attendance, turnover and loss data should put casinos on inquiry concerning the circumstances of those who appear to attend frequently and lose amounts which the ordinary person could not afford to lose without harm being suffered. Gambling is a regulated activity which results in harm to a small proportion of those participating. The Commission considers that licence holders can reasonably be expected to take steps to monitor gambling activity closely to detect the emerging likelihood of harm so that harm minimisation measures can be better focused on those who would most benefit from them.

53. SCML's Identification Policy is structured to make plain:

- (a) the indicators to be taken into account in identifying whether a customer is at risk, and the magnitude of that risk;
- (b) the primary sources of information to be used to identify problem gamblers;
- (c) how information and data is to be used 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 is likely to occur;
- (d) SCML's record keeping requirements, to ensure all relevant information relating to identification of problem gamblers is collected and made available to SKYCITY's Host Responsibility team.

54. Key changes from SKYCITY's original drafting (in section 2.6.2 of the draft RGP), include the following:

- (a) inclusion of additional indicators including visitation frequency, expenditure, and interaction with a known or suspected loan shark. Indicative parameters relating to visitation frequency and expenditure for gaming machines are included based on Dr Delfabbro's research. These include as indicators visits to the casino five times a week or more with expenditure on gaming machines of more than \$300 per session, or visiting two times a week or more combined with losses of more than \$500 per session on gaming machines;
- (b) grouping of indicators into "strong" and "general" indicators. Dr Delfabbro's research indicates that there are high confidence factors which are usually

sufficient to identify that a person is a problem gambler. Beyond this, there are “general indicators” which are behaviours which may be observed in a range of gamblers, but occur more frequently amongst problem gamblers. It may be, depending on the circumstances, that a small cluster of these indicators needs to be evident before identification is made;

- (c) grouping indicators under 4 headings (to simplify understanding) namely intensity and frequency of play, visible emotional disturbance, disfunction in social behaviour, and excessive access to money;
- (d) clarification of what a veiled disclosure might constitute, and that such disclosures are indicators of harm which must be recorded and sent to Host Responsibility;
- (e) clarification that loyalty data should be used proactively to screen for people who need to be monitored (based on expenditure and visitation frequency), as well as for verifying identification of a problem gambler;
- (f) including a plainly stated obligation on SKYCITY to assess whether a customer is a problem gambler “in good faith, on the balance of probabilities, within a reasonable timeframe”;
- (g) clarification of persons responsible for assessing whether a customer is a problem gambler (Host Responsibility will do this), and what information and factors will be considered;
- (h) clarification of the circumstances in which the observation of indicators is likely to lead to identification. Forthright disclosures and the presence of strong indicators almost certainly will result in identification of a customer as a problem gambler (triggering legal obligations to offer information, including on self-exclusion). 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. 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 those customers to be problem gamblers;
- (i) clarification of record keeping requirements. All observations by frontline staff must be reported to Host Responsibility, with no “corroboration” by supervisors required. The Identification Policy outlines the circumstances in which Gambler of Interest files will be opened. In addition, as the Identification Policy now

recognises, SCML runs other databases (basically spreadsheets) recording all disclosures and observations relating to indicators.

55. The indicators noted in the Identification Policy will be kept under review. In particular, SKYCITY has commissioned research with Tracey Schrans and Tony Schellnick from Focal Research in Nova Scotia, with a view to developing an algorithm that might assist in the identification of problem gamblers, utilising loyalty data. The Commission looks forward to receiving a report on this project.

Conclusion

56. This is the first time that the Commission has reviewed an RGP under revised licence conditions. The draft submitted by the Licence Holder was impressive in scope, and recognised the critical role that a casino operator can play in prevention, identification and intervention to support problem gamblers. Working with the Licence Holder, it is hoped the Commission has further strengthened the RGP, in particular by achieving closer alignment with the Act's requirements, elaboration of preventative measures, and greater clarity in the circumstances in which the casino will intervene to assist those customers who are at risk.
57. The Commission specifies the RGP attached to this decision, including the Problem Gambler Identification Policy annexed to and forming part of the RGP. The document still bears the title Host Responsibility Programme as originally submitted but constitutes the RGP under the licence conditions. These documents shall take effect from **17 December 2007**, replacing SCML's RGP dated December 2003 and its Identification Policy dated 9 July 2007. The Licence Holder is required to report next to the Commission in accordance with condition 27 and section 3 of the Programme June May 2008 (six months from the date of this decision).

**GAMBLING
COMMISSION**

Peter Chin
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

3 December 2007



SKYCITY Auckland

**Host Responsibility
Programme**



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Appendix A – Current Host Responsibility Resources for Customers
Appendix B - Identification Policy



1. Introduction

Approval

Effective date: _____ Date of approval by Gambling Commission

Manager:

Alistair Ryan
GM Corporate

David Christian
GM Auckland



1.1 Statement of Position

Introduction SKYCITY Entertainment Group (SKYCITY) is a leading Australasian gaming and entertainment company, providing gaming facilities, restaurants, bars and entertainment through properties in Auckland, Queenstown, Hamilton, Adelaide and Darwin. SKYCITY's vision is to create fun and entertainment.

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. As well as this being the right thing to do, SKYCITY has a range of legal obligations pertaining to harm minimisation that it must comply with. SKYCITY wants customers to have a safe and enjoyable entertainment experience.

The SKYCITY Auckland Host Responsibility Programme ("Programme") plays an important role in achieving the SKYCITY vision, by helping to create a safe and enjoyable environment for all customers. Host Responsibility is the cornerstone of SKYCITY's Harm Minimisation approach.

The Programme has been developed by the Host Responsibility Team and addresses all of the Host Responsibility conditions in the Casino Operator's Licence held by SKYCITY Casino Management Limited that relate to the Auckland property.

**SKYCITY
Code of
Business
Practice**

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



1.2 Guiding Principles

Compliance with legal obligations

- SKYCITY shall comply with its legal obligations relating to harm prevention and minimisation, as set out in the Gambling Act 2003, regulations and licence conditions.
- 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.

Principles

The following principles guide SKYCITY's strategic approach to Host Responsibility:

Focusing on customers

- Harm prevention and minimisation will be integrated in the delivery of positive customer experiences and part of "the way we do things". The safety, wellbeing, needs and preferences of customers will consistently be given primary consideration. In particular, where indicators of harm are identified, timely and effective host responsibility interventions will be undertaken.

Focusing on staff

- Staff must be confident and competent to contribute to harm prevention and minimisation at a level appropriate to their roles. Training will be needs-based and part of ongoing learning and development support. Staff will also be supported by effective policies, processes and resources.

Aligning business and harm minimisation imperatives

- Harm minimisation is a priority and is consistent with achieving business success and sustainability in the long term.

Preventing harm and promoting responsible gambling

- Increasing the emphasis on harm prevention (including promoting responsible gambling) and early intervention will assist in retaining customers over the longer term at the low risk, and low harm end of the Continuum of Harm (Korn & Shaffer, 1999).

Basing harm minimisation on evidence

- Best practice will be demonstrated by the robust evaluation of performance against harm minimisation objectives as part of a continuous quality improvement process. SKYCITY will be knowledgeable about, and responsive to, emerging evidence and research, and will contribute to developing the body of harm minimisation evidence.

Aligning with key government policy directions

- Harm prevention and minimisation initiatives will be aligned with relevant government policies and Codes of Practice, including key elements of the public health approach. These



key elements include primary, secondary and tertiary prevention approaches along the Continuum of Harm, and addressing the underlying determinants of harm that can be influenced by SKYCITY.

Integrating with the business

- Implementation of harm minimisation initiatives will be integrated into business processes and delivery of positive customer experiences, emphasising continual development of effective systems and processes. These initiatives will be applied to a consistent standard across the SKYCITY Group, allowing for variations that are responsive to jurisdictional legal obligations, local culture and local customer profiles.

Recognising and responding to diversity

- Diversity will be recognised and respected. SKYCITY will be responsive to culture, gender and age differences. In particular, harm prevention and minimisation initiatives will be acceptable, appropriate and effective for vulnerable groups.

Fostering constructive relationships

- SKYCITY will value and proactively invest in fostering constructive, functional and collaborative relationships with problem gambling stakeholders. SKYCITY will lead and participate in internal and external harm prevention and minimisation initiatives involving strategic and operational partnerships. SKYCITY will monitor and be responsive to community views.
-



2. Host Responsibility Programme

2.1 Programme Objectives

Objectives

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

- Preventing the onset of harm from problem gambling.
- Minimising gambling related harm for customers who have been identified as problem gamblers, and consequential harm which may be experienced by persons potentially affected by their gambling behaviour.
- Promoting the responsible consumption of alcohol.
- Developing a supporting culture and effective staff training.
- Providing responsible marketing and promotional initiatives.
- Providing a safe gambling environment.
- Engaging effectively with stakeholders.

Resourcing

SKYCITY shall appropriately resource achievement of these objectives, ensuring that supporting systems and processes are in place. These will include providing for data collection, the development and implementation of policies and processes, staff learning and development, making available information resources for staff and customers, and use of appropriate evaluation mechanisms.

Outcomes

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. SKYCITY's reporting requirements relating to achievement of Programme objectives are set out in section 3.



2.2 Approach to Host Responsibility

Definitions of Problem Gambler and Harm

A problem gambler is defined in the Gambling Act 2003 as a person whose gambling causes harm or may cause harm.

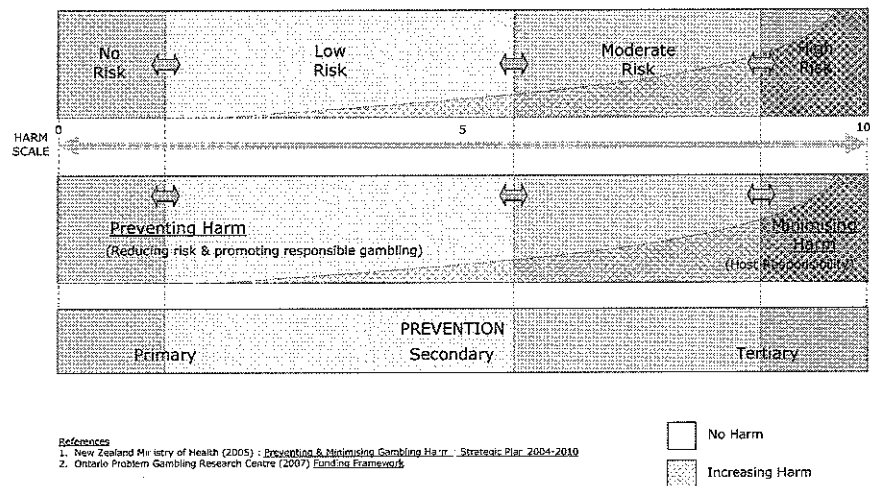
Harm is defined as "harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling", and includes "personal, social or economic harm suffered by the person; the person's spouse, partner, family, whanau or the wider community; or in the work place; or by society at large".

SKYCITY's Host Responsibility Approach - Escalation Response Model

SKYCITY's Escalation Response Model is an important tool informing SKYCITY's approach to Host Responsibility. This is an adaptation of models employed by the New Zealand Police, New Zealand Ministry of Health and Ontario Problem Gambling Research Centre. It is based on the principles of early identification and intervention, due process and intelligence-led interactions.

An intelligence-led approach involves information being collected, collated, analysed, and then applied to assess whether a customer is at risk of, or experiencing harm, and where on the continuum they sit at that point in time. As shown in the figure below gambling risk and harm is on a continuum.

Problem Gambling Risk & Harm Continuum

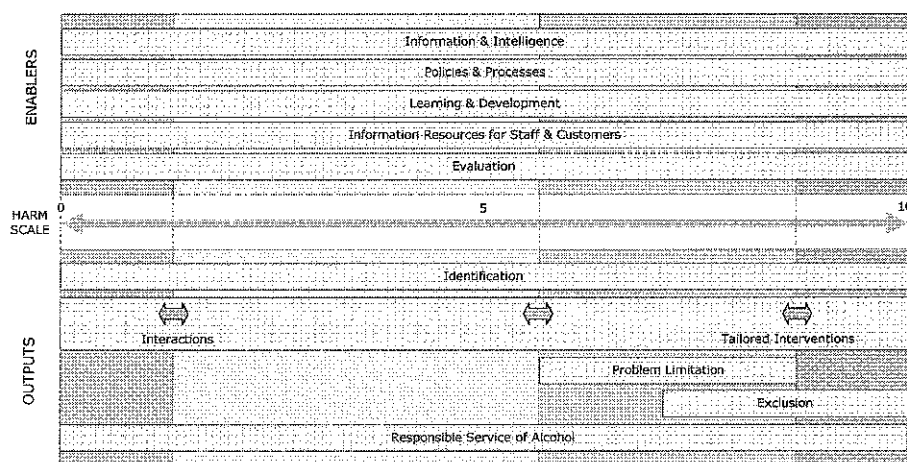


Approach to Host Responsibility, Continued

In order to assess and respond to the level of the risk and harm a customer may be experiencing, SKYCITY has developed an Escalation Response model, set out below.

This shows that, as the risk of harm increases, the Host Responsibility response escalates. As part of the escalated response, customers are provided with information, through a range of resources depending on their perceived risk status. The aim is to reduce risk for all customers, including those whose gambling behaviour gives rise to little risk, and to engage with those at greater risk. SKYCITY intends to support customers to remain at, or progress back to responsible gambling. For high-risk customers, the priority is to reduce risk and to ensure that harm is minimised.

SKYCITY Escalation Response Model



A key objective of the Programme is to establish effective ways to identify and assist problem gamblers based on direct evidence of actual harm, or by inferring (using various indicators) that harm is present or likely to occur. At the point that a person is identified as a problem gambler in accordance with the SKYCITY Problem Gambler Identification Policy, SKYCITY's legal obligations under the Act to approach the person and offer information or advice about problem gambling are triggered.

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Approach to Host Responsibility, Continued

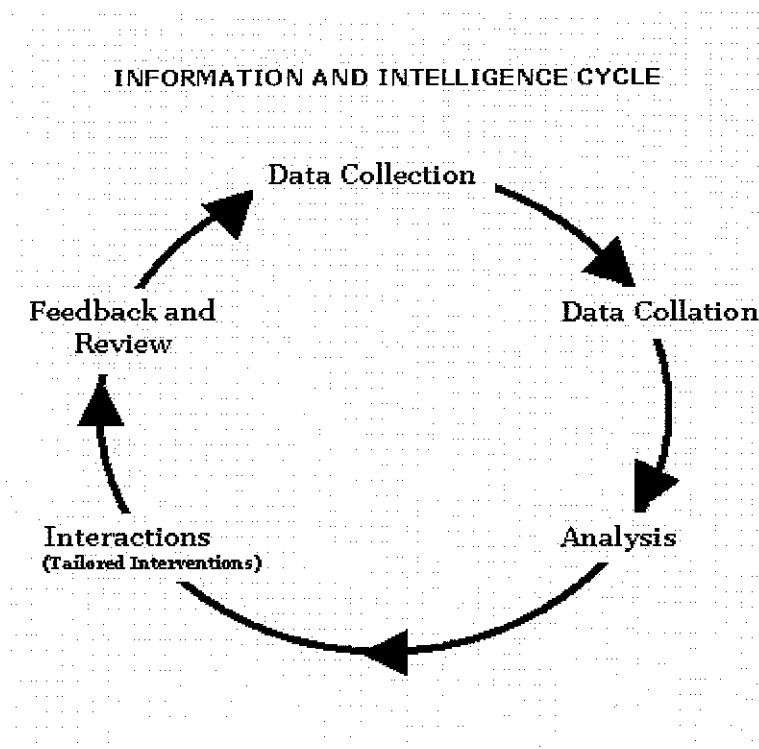
There are a number of supporting systems and processes that underpin the SKYCITY Escalation Response Model, and effective Host Responsibility, including:

- Systems and processes set out in this Programme and in policies, procedures and guidelines;
 - Staff learning and development, including training;
 - Collection, analysis and application of information and intelligence to inform assessment of customer risk/harm and the timely identification of problem gamblers, and the provision of appropriate responses;
 - Customer information resources; and
 - Monitoring and evaluation.
-

Information and Intelligence

Information and intelligence are the core components of the SKYCITY Escalation Response Model. The basis of intelligence-led interactions is the creation of systems to collect, collate and analyse information. Customer service and Host Responsibility actions are adapted in response to new information.

Information and Intelligence Cycle



Continued on next page



Approach to Host Responsibility, Continued

Data Collection: SKYCITY collects a range of data that can be used to assess whether a customer may be a problem gambler. The five sources of information collected include: customer disclosures, behavioural observations, customer data, third-party disclosures, and interviews with customers or staff¹.

Data Collation: SKYCITY has developed a number of systems for noting and collating information. This information is sent through to the Auckland Host Responsibility team for analysis.

Analysis and Assessment: SKYCITY analyses the information collated to assess where the customer currently sits on the Continuum of Harm. This includes reviewing all information to ascertain whether the customer is a problem gambler, requiring that steps be taken to comply with SKYCITY's legal obligations².

Interactions (including targeted interventions): Frontline staff interact with customers as part of general customer services. These interactions occur at the low risk/harm end of the continuum and may include checking on a customer's well-being, and/or facilitating breaks from gambling, and/or providing or making the customer aware of host responsibility information resources. Targeted interventions align with SKYCITY's legal obligations relating to problem gamblers and are delivered when a customer is identified as a problem gambler as a result of Host Responsibility undertaking a harm/risk assessment or where there may be an immediate response in relation to indicators of harm identified by a staff member. A targeted intervention usually involves an appropriately trained staff member or Host Responsibility engaging with the customer and/or third party and providing appropriate information, advice and assistance in accordance with the Gambling Act 2003.

Feedback and Review: SKYCITY reviews customer interactions to ensure that the interactions are effective in minimising harm. The feedback and review process provides opportunities for improving the information and intelligence process.

Immediate Response: Where customers are displaying signs of harm such as distress, SKYCITY takes immediate action to minimise harm. While SKYCITY has a number of trained staff to deliver tailored interventions for 'at-risk' customers, all frontline staff are trained in problem gambling awareness and are ready and able to approach players to offer information and assistance, as necessary and appropriate.



Continued on next page

¹ The indicators of problem gambling are addressed in the SKYCITY Problem Gambler Identification Policy annexed to and forming part of this Programme.

² The steps to be taken upon identification of a problem gambler are set out in the SKYCITY Problem Gambler Identification Policy and its Exclusion SOP.

Approach to Host Responsibility, Continued

Policies and Procedures

The following Policies, Procedures and Programmes have been developed to provide operational guidelines on the implementation of the SKYCITY Escalation Response Model. The Policies, Procedures and Programmes are consistent with the Act, regulations, licence conditions and this Programme, and will be updated to reflect changes.

Policies:

- Identification Policy.

Standard Operating Procedures:

- Information Collection and Collation.
- Analysis and Intervention.
- VIP Agreed Limitation.
- Exclusion.
- Unattended Children.
- Underage Persons.
- Responsible Service of Alcohol.

Programmes:

- Employee Gambling Harm Prevention Programme.
-

Customer Information Resources

SKYCITY produces a range of host responsibility information resources for customers. Copies of all SKYCITY brochures and information are held at the Security Podium and in other locations throughout gambling areas.

This information is also supplemented and supported by the SKYCITY Auckland website (www.skycityauckland.co.nz) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is displayed on the SKYCITY Auckland 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 the SKYCITY Auckland customer base.

A summary of the resources currently available is included in Appendix A.

Evaluation

SKYCITY strongly believes that Harm Minimisation should be based on evidence and research. SKYCITY will evaluate its own performance against Harm Minimisation outcomes as part of a continuous quality improvement process. This will involve reviewing Host Responsibility structures, processes and outcomes against the Programme objectives.



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2.3 Internal Culture and Competencies

Introduction SKYCITY is committed to developing an internal culture that proactively supports and promotes Host Responsibility. There is a focus on ensuring that Host Responsibility is integrated into business processes and supports the delivery of positive customer experiences. Learning and Development (section 2.6.1) is a key strategy supporting this approach.

2.3.1 Employee Gambling-Related Harm

Background SKYCITY has developed a programme to address the operator licence condition:

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

Approach

The programme aims 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.

The programme is a joint project between Host Responsibility and Human Resources. It is led through SKYCITY Auckland's Employee Care Office and supported by an internal project team. The programme includes an integrated set of elements that aim to prevent gambling-related harm amongst all staff, promote healthy lifestyle choices, and provide effective support for those staff experiencing gambling-related harm. There is also a research component designed to inform ongoing development and implementation of the programme, and to measure effectiveness.

The elements of the programme align with the Continuum of Harm and the Primary/Secondary/Tertiary prevention model set out in the Ministry of Health's Strategy: Preventing and Minimising Gambling Harm³. The programme explicitly aligns with research⁴ that has been conducted, focusing on reducing risk factors and enhancing protective factors amongst venue-based staff.



Continued on next page

³ Ministry of Health (2005) Preventing and Minimising Gambling Harm: Strategic Plan 2004-2010. Wellington: Ministry of Health

⁴ Shaffer H & Hall M (2002) The natural history of gambling and drinking problems among casino employees. *Journal of Social Psychology*, 142(4), 405-424.

Hing N & Breen H (2006) Workplace factors that encourage and discourage gambling amongst gaming venue employees: a managers' perspective. NSW: Southern Cross University of Australia.

Internal Culture and Competencies, Continued

The elements of the programme include:

Information Resources

- Develop supporting resources for staff, focused on prevention, early identification and intervention, and help-seeking. The supporting resources will include a standardised gambling screen and self-help workbook to assist with early self-identification and intervention.

Primary Prevention

- Prohibit staff from gambling at any SKYCITY 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.
- Provide staff events to encourage a culture of belonging.
- Work with local venues to maximise the effectiveness of their Host Responsibility Programmes.
- Incorporate education about problem gambling and underlying risk factors (such as depression and alcohol, etc) in staff wellness programmes. Promote healthy family and recreation choices, including provision of information about alternative activities, such as physical activity.
- Include education and information about personal problem gambling in Learning and Development, for frontline staff and managers and supervisors.

Secondary Prevention

- Screen all job applicants for evidence of problem gambling.
- 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 Auckland Host Responsibility Programme.
- Promote awareness about customer self-assessment and self-help resources, and encourage staff to use these resources themselves to assist with early identification and intervention.

Tertiary Prevention

- Develop and implement an escalation pathway for staff who are experiencing gambling-related harm including:
 - Identification
 - Intervention - roles and responsibilities of staff;
 - Referral to confidential support through the Employee Care Manager, Employee Assistance Programme and/or problem gambling treatment provider;
 - Confidentiality;
 - Appropriate responses to concerns about colleagues.
- Promote awareness, encourage and support help-seeking.



2.4 External Stakeholder Engagement

Background SKYCITY will proactively engage with stakeholders. Stakeholders comprise individuals or organisations who have the ability to influence positive Harm Minimisation outcomes for customers, families/whanau and communities. These stakeholders include government agencies, problem gambling service providers, the wider health and social services sector, other gambling operators and researchers. The aim is to foster constructive, collaborative and functional relationships with stakeholders and to receive input which assists SKYCITY with the development and delivery of its Host Responsibility Programme and harm prevention and minimisation initiatives.

Approach SKYCITY Auckland will continue to facilitate and convene opportunities for regular engagement to ensure stakeholders:

- Understand and are aware of SKYCITY Auckland's Programme.
- Are able to raise and discuss operational issues in relation to Host Responsibility.
- Have opportunities to provide input into the development and implementation of its Programme and harm prevention and minimisation initiatives.
- Have opportunities to participate in partnership projects on key initiatives.

Auckland Host Responsibility Community Liaison Group SKYCITY convenes a bi-monthly Auckland Host Responsibility Community Liaison Group to discuss Host Responsibility issues. These issues primarily relate to operational processes e.g. referrals, exclusions etc. There are also opportunities to discuss strategic or broader sector issues.

Membership includes representatives from:

- Treatment service providers including problem gambling and alcohol and other drugs.
- Public health providers.
- Government agencies including Police, Department of Internal Affairs and the Alcohol Advisory Council of New Zealand (ALAC)
- Overseas student liaison groups.
- Budgeting services.
- Ethnic/migrant services.
- Researchers.

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

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



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

SKYCITY is to develop Terms of Reference for Liaison Group meetings.



2.5 Preventing Gambling-Related Harm

Introduction SKYCITY will focus on addressing those underlying determinants of gambling and alcohol-related harm that can be influenced by SKYCITY. This will include initiatives that aim to reduce associated risk factors and enhance associated protective factors among all customers including at-risk groups. Harm prevention will be a key consideration in business development and general marketing strategies, and in the provision of safe entertainment environments. SKYCITY will provide environments that support responsible gambling and alcohol consumption, encourage healthy choices and support effective Host Responsibility.

2.5.1 Environmental Design

Approach SKYCITY acknowledges that environmental features influence behaviour and can impact on health and social outcomes, including gambling harm. SKYCITY's general approach towards environmental design is proactively to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol. In particular, SKYCITY focuses on maintaining environmental safety, and identifying and addressing any harm-related issues that may be associated with proposed environmental changes. 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 (CGM) 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.
- Access criteria, including dress codes and age restrictions.

In particular, SKYCITY shall in its environmental design seek to ensure:

- Problem/responsible gambling signage, exit points, and public telephone facilities 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, utilizing 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 Levels 2 and 3 of the Auckland venue, including 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.

2.5.2 Safe Gambling Environment

Gaming Machine Play

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

Third Party Loans for Financial Gain

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 Auckland casino.

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.

SKYCITY will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain, and to assist this process will develop a policy for identifying persons engaged in such activity. SKYCITY will ensure that signage is displayed in appropriate areas publicizing that loan sharks will be excluded.

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 Auckland Undesirable Behaviour Standard Operating Procedure (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 Gambler of Interest (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.

In consultation with other relevant agencies, SKYCITY will further develop appropriate general and specialised staff training awareness and other appropriate measures to prevent and minimise harm associated with loan sharking.

2.5.3 Responsible Marketing

Approach

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.

Generally, SKYCITY takes a conservative approach to the marketing of gambling products.

The majority of SKYCITY's marketing activities are broad-based, and focus on promoting the entire range of SKYCITY's entertainment, tourism and business options, including the casinos, cinemas, bars and restaurants, Sky Tower, the hotels and Convention Centre.

Responsible Marketing Guidelines for the SKYCITY Group will be developed to align with the sector project: "Marketing of Gambling Consistent with the Gambling Act 2003."

Internal Process

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 Harm Minimisation and Host Responsibility during the development process, with final sign-off by the legal team.

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?

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

2.5.4 Provision of 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 personal 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 elsewhere in this Programme, and the SOPs.

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

SKYCITY is currently developing an information resource plan which will address the further development of resources to ensure that customers, staff and stakeholders are provided with timely and relevant information and advice. In developing its resource plan, consideration will also be given to producing information that reduces 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 ensures that:

- Host Responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of SKYCITY Auckland 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.
- Call Centre facilities include a direct line to the Gambling Helpline.

SKYCITY actively promotes the Gambling Helpline and other free problem gambling counseling 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.

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.

**Casino
Electronic
Gaming
Machines**

All CGM's 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 "What are the odds?" leaflet, which is available from the security podium and a variety of locations on the gaming floor.

Customers may request a copy of rules at any time. If the request is for general information or an overview of the game, the Area Manager explains this and presents a "How to Play" brochure.

**Information
Requests By
Customers**

Should a customer wish to seek further clarification of game rules, the customer is taken to the security podium on the main gaming floor where copies of the game rules are made available to the customer.

**Information
on Gambling
Activity**

Loyalty Club 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 Club players, at their request, on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.



2.6 Minimising Harm

2.6.1 Learning and Development

Introduction SKYCITY Auckland is committed to developing staff awareness, understanding and commitment to Host Responsibility especially with respect to gambling and alcohol-related harm. Learning and development is critical to the establishment of an appropriately skilled and competent workforce that actively promotes and supports SKYCITY's approach to Host Responsibility. SKYCITY Auckland 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.

Guiding Principles SKYCITY's learning and development approach is supported by the Host Responsibility guiding principles. In particular, there is an emphasis on all learning and development initiatives being responsive to culture, gender and age differences both for customers and staff.

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 staff record, collate, analyse and electronically record all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers. Host Responsibility also record interactions and interventions they undertake themselves. The information is used to undertake an assessment of risk and harm and to determine where the customer sits on the Continuum of



Harm at that point. As a result of the assessment, a Gambler of Interest (GOI) file may be opened, and/or appropriate follow up interactions or interventions undertaken by either frontline staff, managers or supervisors or Host Responsibility. This may include meeting with customers to check on their wellbeing. Host Responsibility are responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of Host Responsibility advice and support to staff.

Learning and Development Approach

SKYCITY takes a learning and development approach which employs established models of best-practice and includes a training mix of classroom based, multi-media and job-specific learning and development. Learning and development approaches are tailored depending on the roles and responsibilities of staff, and their required Host Responsibility customer interactions. For all staff who have direct contact with gambling customers in the casino, SKYCITY will develop opportunities to supplement class-room training with on-the-job coaching and support.

Learning and Development Requirements

Induction Training (Level 1)

All permanent staff, whether or not in direct contact with customers, must participate in 2 hours of classroom-based training within one month of commencement. 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.

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 one month 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.

Further Responsible Service of Alcohol training (2 hours) is provided to staff employed in positions associated with the following departments:

- Gaming.
- Food & Beverage.
- Security & Surveillance.

Induction training will generally be classroom based, with the exception of casual staff⁵, for whom a self-guided learning module has been developed.



⁵ 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.

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.

Training for Supervisors (Level 2)

Supervisors from Gaming, Food & Beverage, and Security & Surveillance must participate in supplementary Level 2 training. This training is to be undertaken within 2 months of commencement or promotion to a supervisor position. The training is a mix of theoretical e-learning, and practical classroom based (face-to-face) components, delivered over 6 hours. The training includes information on and procedures for:

- Identification of problem gamblers;
- Initial action with respect to customers requesting problem gambling assistance, to include brief interventions and motivational interviewing;
- Identification and intervention with respect to excessive alcohol consumption; and
- Support of staff who have intervened and debrief.

Advanced Training (Level 3)

Advanced training (8 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 some supervisors and all managers. It also involves other senior employees throughout the Auckland 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.

Refresher Training

SKYCITY Auckland 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.



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 using existing business systems and processes to share information and build Host Responsibility knowledge across the Auckland business. These internal opportunities include:

- Internal communications e.g. staff newsletters;
- Inclusion in business or management processes e.g. staff meetings and key performance indicators;
- Discussion forums led by Harm Minimisation and Host Responsibility staff; and
- Participation by staff in Harm Minimisation and Host Responsibility policy development processes.

Evaluation

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

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



Minimising Harm, Continued

2.6.2 Identification of Problem Gamblers

SKYCITY must have a policy (section 308, Gambling Act 2003) 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.

A copy of SKYCITY's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme.



Minimising Harm, Continued

2.6.3 Exclusion

Introduction SKYCITY offers two types of exclusions:

- Self Exclusion; and
- SKYCITY Exclusion.

SKYCITY Auckland 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.



Minimising Harm, Continued

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 counseling 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 counseling service.
- Arranges for the counseling 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 counseling 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.



Minimising Harm, Continued

Breaches

SKYCITY staff are required to be vigilant for any excluded customer who attempts to re-enter gaming areas. SKYCITY Auckland 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 police prosecution. The Department of Internal Affairs is notified of all breaches by Excluded customers.

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

The SKYCITY Auckland 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;
- Advise the Loyalty Operations Manager within 24 hours of a loyalty customer being trespassed or formally requested to leave the premises, to ensure the account is deactivated;
- Forward any surrendered Loyalty card(s) to Loyalty Administration.

Host Responsibility must:

- Deactivate Excluded cardholders' accounts.

Loyalty Operations must:

- 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 an Action staff member. Having confirmed that the customer has been Excluded, Trespassed or formally requested to leave, Action will contact Security and appropriate action will be taken in relation to that customer.



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Minimising Harm, Continued

2.6.4 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 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 is that the customer and Host Responsibility agree that it will support the at-risk customer to gamble without experiencing harm. Participation is closely monitored and re-assessed. Where infringements occur, Host Responsibility 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 Options Customers who are eligible for participation in the Agreed Limitation programme are offered a choice of two programme options to assist in minimising the potential for gambling harm. These options are:

- Limited Play Option
 - supports play to continue but places restrictions on time. This includes reducing the number of days a customer may play and length of play per visit.
- Time Out Option
 - supports the customer to take a break from all play for varying periods.

An offer of Agreed Limitation is not a substitute for, or an alternative to the provision of information on the availability of Self Exclusion. Customers identified for participation in the Agreed Limitation programme are provided with information regarding exclusion options prior to signing an Agreed Limitation Agreement. Agreed Limitation will only be made available in circumstances where a customer can gamble without experiencing harm. 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 counseling. Contact details for problem gambling counseling services are available to customers at all times and any customer wishing to access these services is supported to do so.

The Agreed Limitation programme is a pilot initiative. Other components of this initiative to be implemented include a scoping exercise to investigate the potential for extending this programme to other groups of customers. It is intended in future that SKYCITY will, at the request of any customer, impose restrictions on the number of days that he or she may play and length of play per visit, and expenditure.



Minimising Harm, Continued

2.6.5 Responsible Service of Alcohol

Background The SKYCITY Auckland Responsible Service of Alcohol Programme is designed to ensure customers enjoy an environment that is safe and enjoyable. A key component is the SKYCITY Auckland 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 Auckland programme regarding the responsible service of alcohol:

- SKYCITY Auckland provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- SKYCITY Auckland 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 Auckland employees, temporary and contract staff receive an overview of the Responsible Service of Alcohol policy during induction as part of the Host Responsibility Level 1 training programme, including recognition of excessive alcohol consumption traits.
- All SKYCITY Auckland employees involved in the sale, service or monitoring and/or resolution of incidents involving the sale or service of alcohol (servers) complete the Responsible Service of Alcohol training programme, prior to serving alcohol⁶.
- SKYCITY Auckland takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- SKYCITY Auckland 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.



Continued on next page

⁶ This provision includes those staff employed on a casual basis.

Minimising Harm, Continued

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 Auckland 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 Host⁷. This is not intended to prohibit normal complimentary Food and Beverage Service for valued 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 Auckland Responsible Service of Alcohol Programme and procedures regarding responsible service of alcohol.

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⁷ The discretion to serve drinks will only be exercised where the Gaming Supervisor or Host is satisfied that the customer is not intoxicated.

Minimising Harm, Continued

2.6.6 Unattended Children

Background SKYCITY management does not tolerate children being left unattended on any part of its properties.

Approach SKYCITY Auckland takes active steps to prevent parents leaving their children without adult supervision.

Employees must report to Security any incident where it is apparent that a child has been left unattended by their guardian or caregiver.

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 excuse 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 Auckland car parks and environs to detect any unattended children in vehicles.

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Minimising Harm, Continued

2.6.7 Underage Persons

Background SKYCITY is committed to keeping minors off all gambling floors and out of 'supervised areas'. SKYCITY will rigorously enforce the prevention of under-age gambling in its casinos.

Approach SKYCITY Auckland 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.

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

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

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

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Minimising Harm, Continued

2.6.8 Standards of Dress and Behaviour

Background SKYCITY Auckland 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 Auckland requires a neat and tidy standard of dress.

The following are not permitted at SKYCITY Auckland's Casino:

- torn clothes;
 - gang patches or other insignias;
 - jandals;
 - dirty clothes or footwear;
 - hats or caps (except for medical or religious reasons)⁸.
-

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 Auckland 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.



⁸ Hats and sunglasses are permitted in the Poker Zone only.

3. Monitoring and Reporting

Introduction

The Auckland 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 2.1.

The Programme specifies SKYCITY's minimum requirements in relation to Host Responsibility obligations. SKYCITY is not prevented from trialling and introducing new initiatives in addition to what is specified in the Programme. SKYCITY will report on new harm minimisation (including host responsibility) initiatives that relate to the Auckland Host Responsibility Programme, undertaken during the reporting period.

In particular, SKYCITY is undertaking a project to develop a Quality Improvement Plan that will support effective, ongoing implementation of the Group's Harm Minimisation Framework, including site host responsibility programmes. As a result of this initiative, SKYCITY may seek to amend this section of the Programme, prior to the next two-yearly review.

Reports to the Gambling Commission

SKYCITY will report at least every six months to the Commission on the implementation of the Programme, commencing 1 April 2008.

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. Measures collected annually will be included in the report to the Commission for the reporting period in which the data were published. 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 2.1 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, the Police, and the community liaison group.
- Proposed improvements to the Programme.



Gambling Related Measures	Source of data	Frequency
<ul style="list-style-type: none"> Casino gambling expenditure. 	DIA	Annual
<ul style="list-style-type: none"> Number of customers about whom there have been observations. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of observed indicators reported to Host Responsibility. 		
<ul style="list-style-type: none"> Number of approaches to SKYCITY by third parties. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> 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	Six monthly
<ul style="list-style-type: none"> Number of customers on incident spreadsheet. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of Gambler of Interest (GOI) files by: <ul style="list-style-type: none"> Ethnicity Gender Age Preferred mode of gambling. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of exclusions by: <ul style="list-style-type: none"> Ethnicity Gender Age Preferred mode of gambling (tables/EGMs) Prompted by third party disclosures Exclusion type (self/SKYCITY) Following re-entry. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of customers participating in Agreed Limitation programme. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of Excluded customers agreeing to be contacted by help services on exclusion form. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Numbers of new and total clients citing casino gambling (by CGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counseling services by: <ul style="list-style-type: none"> Gamblers Significant others Mean SOGS scores Ethnicity Gender Age Self-reported dollars lost. 	MOH report	Annual



<ul style="list-style-type: none"> Average South Oaks Gambling Screen (SOGS) scores of clients citing casino gambling as the primary mode who utilise face-to-face counseling services. 	MOH report	Annual
<ul style="list-style-type: none"> Number of breaches of exclusion by: <ul style="list-style-type: none"> Ethnicity Gender Age 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of successful and unsuccessful applications to re-enter following exclusion 	SKYCITY	Six monthly
<ul style="list-style-type: none"> The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff). 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of persons trespassed or required to leave for making loans for financial gain. 	SKYCITY	Six monthly
Measures relating to Responsible Consumption of Alcohol		
<ul style="list-style-type: none"> Number of "Under the Influence" (UTI) incidents (internal report). 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of Police contacts citing SKYCITY as venue where their last drink was served. 	Police Alcolink database	Six monthly
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 who have completed the appropriate level training. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Staff recall of knowledge and behaviours related to Host Responsibility and associated policies and procedures. 	L&D Evaluations Mystery Shopper	Six monthly Annual
<ul style="list-style-type: none"> Staff perceptions of the effectiveness of training. 	L&D Evaluations	Six monthly
<ul style="list-style-type: none"> Staff perceptions on the effectiveness of the Employee Gambling Harm Programme, reporting to the Commission to include percentage response rate of staff to the SKYCITY survey. 	SKYCITY commissioned survey	Annual
Other Programme activity and compliance-related measures		
<ul style="list-style-type: none"> Number of internal and external underage incidents. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of unattended children. 	SKYCITY	Six monthly
<ul style="list-style-type: none"> Number of Requests to Leave the Premises (RTLPs). 	SKYCITY	Six monthly



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SKYCITY Code of Business Practice:

www.skycityentertainmentgroup.com/skycity/corporate/about-skycity/corporate-responsibility/corporate-responsibility_home.cfm

SKYCITY Host Responsibility Webpage:

(http://www.skycityentertainmentgroup.com/skycity/corporate/about-skycity/host-responsibility/host-responsibility_home.cfm)



Appendix A – Current Host Responsibility Resources for Customers (as at May 2007)

“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: Arabic, Chinese, English, Japanese, 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 counseling 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 counseling 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.

“Understanding your Exclusion Options” – brochure
The brochure outlines the self-identified exclusion and exclusion procedure and process. It provides simple information on frequently asked questions with regard to the exclusion process. It also provides the gambling helpline number. The “Understanding your Exclusion Options” brochure is available in English, Korean and Chinese, with A4 handouts available in Maori, Samoan and Tongan.

“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.



Appendix B



Host Responsibility

PROBLEM GAMBLER IDENTIFICATION POLICY

(Gambling Act 2003, sections 308-311)



Problem Gambler Identification Policy

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

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 Problem Gambler Identification Policy ("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 addresses SKYCITY's obligations under section 308 of the Act, and includes:

- A 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;
- A description of measures to achieve quality improvement and ensure evaluation is undertaken;
- A Bibliography.

The Policy applies to SKYCITY Auckland only.

**GAMBLING
COMMISSION**

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 previous research and evidence from other sources (Allcock et al, 2002), a list of visible signs and behaviours has been developed that may be indicative of gambling-related harm. Some of these can be considered "high confidence" or "strong indicators" in that the presentation of even one or two of these factors 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 (e.g., they want to self-exclude), or do so indirectly (veiled disclosures).

INDICATORS

Strong Indicators

- Requests for assistance to self-exclude;
- Self-identified problem gambler or forthright disclosure;
- Veiled or forthright third-party disclosures that may, or may not, make reference to the person's gambling;
- Severe emotional distress, including 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);

Disfunction 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;
- 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;
- Rummaging around in bags or upending wallets for additional 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 (Dickerson, 1993; Productivity Commission, 1999). It is well-established from international research that problem gamblers are more likely than other players to lose control of their expenditure, to chase their losses (Lesieur, 1984; O'Connor & Dickerson, 2003), 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 (e.g., Delfabbro & Winefield, 1996; McMillen et al., 2003; Roy Morgan Research, 2001; Productivity Commission, 1999).

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.

Loyalty data in relation to all forms of gambling should be used to examine the level of expenditure as well as changes in the patterns of expenditure. SKYCITY has already undertaken a project to assess the feasibility of using current Loyalty data to develop an algorithm that might assist in the identification of problem gamblers with greater confidence and certainty. Problematic play may be indicated by a variety of factors, including the level of expenditure, and reluctance to use Loyalty Cards once there is a suspicion of being monitored by casino staff. The Loyalty data project will investigate the relationship between current variables along with the development of new variables to assist in the identification of problem gamblers with greater confidence and certainty.

It is anticipated that SKYCITY should be able to report on the future refinement of the methodology. In light of the results of the Loyalty data project, SKYCITY may approach the Gambling Commission in the future seeking an amendment to the Identification Policy.



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.

1. CUSTOMER DISCLOSURES

Identification through customer disclosures may be forthright and/or veiled.

Forthright disclosure

Examples of forthright disclosures 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.

Veiled disclosures

Examples of veiled disclosures 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 veiled disclosures should be determined by the nature of the disclosure. Veiled 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.

Disclosures, whether forthright or veiled and whether from customers or third parties, must be recorded and sent to Host Responsibility to be used in making problem gambling assessments.

2. 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 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 their external, or visible behaviour. Staff should use this information to narrow down 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.

3. 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 veiled or direct 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.

4. 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 from the wider community of the potential problem gambler 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 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. 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 Gambler of Interest (GOI) file is opened, and an investigation is undertaken.

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

5. 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

Overview

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 the incident spreadsheet, loyalty and security database 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 the 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;
- Pro-social and anti-social behaviour including uncharacteristic or atypical behaviour;
- Perceived changes in cognitive/psychological state;
- Changes in patterns of play; and
- Number of indicators and repetition over time.

Identification

Forthright 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. 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.

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 1 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 Gambler of Interest (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 staff collate, analyse and electronically record all information relating to indicators of harm noted by frontline staff, supervisors and managers. Host Responsibility also record interactions and interventions undertaken in relation to a customer by frontline staff, supervisors and managers or by Host Responsibility.

Requirement to record information

Host Responsibility electronically records and retains for a period of 12 months the following information:

- all disclosures and observations relating to indicators of gambling harm reported by staff;
- all reported customer interactions relating to indicators of gambling harm undertaken by staff, supervisors and managers, and all interactions undertaken by Host Responsibility;
- all third party disclosures.

GOI Files

A key purpose of a Gambler of Interest (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:

- Fortnightly review for the duration of the investigation.
- Formal twelve week review
- Formal twenty-four week review

Within each of these periods, there is to be a review of customer information. If further 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 24 week review period, the GOI file is deactivated. All deactivated GOI files will be retained by SKYCITY. A GOI file may be reactivated at any stage subsequent to the 24 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 177(3) of the Act and Minimum Operating Standards

Under section 177(3) of the Act, SKYCITY must retain all books, records, and documents relating to the operation of the casino for seven years.

Minimum Operating Standards (MOS) promulgated by the Department of Internal Affairs under section 141 of the Act stipulate record keeping and notification requirements relevant to sections 307-311 of the Act.



Section Six - Quality Improvement and evaluation

Where new evidence emerges in relation to indicators of harm and identification of problem gamblers, SKYCITY will review its Problem Gambler Identification Policy to reflect best-practice. The Problem Gambler Identification Policy will be measured and monitored as part of the Auckland Host Responsibility Programme. Quality improvement processes, including formal evaluation will also contribute to greater effectiveness.



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