

IN THE MATTER of the Gambling Act 2003

AND

on an application by **SKYCITY AUCKLAND LIMITED** to amend a casino licence condition and for approval of design changes, and **SKYCITY CASINO MANAGEMENT LIMITED** to amend a casino licence condition

BEFORE THE GAMBLING COMMISSION

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

Date of Application: 25 August 2006

Date of Decision: 13 October 2006

Date of Notification
of Decision: 20 October 2006

DECISION

**ON AN APPLICATION BY SKYCITY AUCKLAND LIMITED TO AMEND A LICENCE
CONDITION AND FOR APPROVAL OF DESIGN CHANGES, AND BY
SKYCITY CASINO MANAGEMENT LIMITED TO AMEND A LICENCE CONDITION**

Application

1. SKYCITY Auckland Limited ("**SCAL**") applied to the Gambling Commission (the "**Commission**");
 - (a) to amend condition 12 of its venue licence; and
 - (b) for approval, under condition 6, of design changes to the principal public cashiering facility on Level 2.
2. SKYCITY Casino Management Limited ("**SCML**") applied to the Commission to amend condition 21 of its operator's licence.

Gambling Act 2003 and licence conditions

The applications to amend the licence conditions are made under section 139 of the Gambling Act 2003 (the "**Act**").

4. The relevant licence conditions are as follows:

SCAL venue licence

6. The Licence Holder must obtain the approval of the Commission prior to:

- (a) construction or design changes to Levels 2 and 3, including the Gambling Area but excluding the SKYCITY Theatre and foyer area, restaurant and bar areas outside the Gambling Area, and the back of house areas used by staff (unless construction or design changes to any of these excluded areas may impact on matters set out in condition 7 in which case prior approval must be sought);
- (b) the construction or relocation outside the Gambling Area and within the Casino Venue of bank facilities available to the public excluding ATMs, EFTPOS and like devices;
- (c) the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue.

The process by which the Licence Holder may obtain approval for construction or design changes to Levels 2 and 3, including the Gambling Area (paragraph (a) above) is set out in condition 7. The Commission will determine any application for approval under 6(b) and (c).

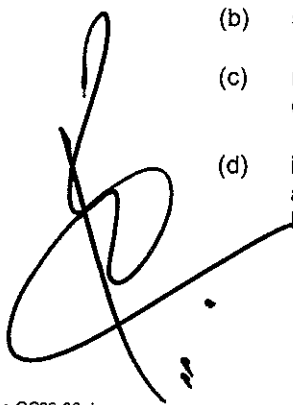
7. The Licence Holder must notify the Executive Director of any proposed changes to the construction or design of Levels 2 and 3, including the Gambling Area but excluding SKYCITY Theatre and foyer area, restaurant and bar areas outside the Gambling Area, and the back of house areas used by staff. Notification must be accompanied by relevant drawings and an assessment of any impacts the alterations may have on:

- (a) the integrity and fairness of games;
- (b) the effectiveness of security and surveillance;
- (c) harm prevention, harm minimisation and responsible gambling;
- (d) potential access to the Gambling Area by persons under 20 years of age; and
- (e) compliance by any person with the Act, including section 11.

The Executive Director may approve the proposed changes to the construction or design if he or she is satisfied that there are no adverse impacts in relation to the matters specified in (a)-(e) above. If the Executive Director is not satisfied, he or she will refer the proposal to the Commission for determination.

12(i) The Licence Holder shall maintain at least one principal cashiering facility on each level of the gaming floor which is clearly visible to patrons. Each such cashiering facility shall as a minimum requirement include the following:

- (a) accommodation for general cashiers;
- (b) storage facilities for cashiering inventory;
- (c) manually triggered and automatic silent alarm systems connected directly to monitor rooms of the surveillance department; and
- (d) interconnect door entry and exit system (man trap) which will not permit a person to pass through the second door until the first door is securely locked.



- (ii) The Licence Holder may provide accommodation for chip bank cashiers in the principal cashiering facility which shall be physically separate from general cashiers unless the Commission approves otherwise.
- (iii) Chips and plaques held in reserve and not used for active gaming shall be housed in a locked compartment within the chip bank.

SCML operator's licence

- 21(i) The Licence Holder shall maintain at least one principal cashiering facility on each level of the gaming floor which is clearly visible to patrons. Each such cashiering facility shall as a minimum requirement include the following:
 - (a) accommodation for general cashiers;
 - (b) storage facilities for cashiering inventory;
 - (c) manually triggered and automatic silent alarm systems connected directly to monitor rooms of the surveillance department; and
 - (d) interconnect door entry and exit system (man trap) which will not permit a person to pass through the second door until the first door is securely locked.
- (ii) The Licence Holder may provide accommodation for chip bank cashiers in the principal cashiering facility which shall be physically separate from general cashiers unless the Commission approves otherwise.
- (iii) Chips and plaques held in reserve and not used for active gaming shall be housed in a locked compartment within the chip bank.

Submissions by the Applicants

- 5. The casino wants to reposition the principal public cashiering facility on Level 2 north of its present location, and to reduce the number of cashiering stations from 10 to 8.
- 6. While preparing the application for this, it was noted that licence conditions 12 of SCAL's venue licence and 21 of SCML's operator's licence require the principal cashiering facility to have a "mantrap" door system. The Applicants want to remove this requirement from their respective licences, submitting that:
 - (a) there is no justification for a mantrap, given the separation of the public cashiering facility from the non-public facility which houses the bulk of the casino's funds;
 - (b) the proposal to dispense with the mantrap would not increase the risk of theft of money given the presence of the duress alarm system, roving security personnel and CCTV coverage.

Submissions by the Secretary

- 7. The Secretary had no objection to the planned relocation of the public cashiering facility, subject to the surveillance standards being observed. The Secretary also had no objection to the removal of the mantrap from the Level 2 public cashiering facility, noting that, with the benefit of modern technology and a strict regulatory regime, a mantrap is

not required for a standalone public cashiering facility which does not have direct access to the bulk of the casino's funds

Analysis

8. In decision GC23/06, the Commission approved the relocation and construction of the non-public cashiering facilities away from the public facilities, to Level 1 of the casino.
9. With the public cashiering facility no longer providing direct access to the bulk of the casino's funds, the Commission was satisfied that the mantrap is unnecessary and licence conditions 12 and 21 can be amended to delete this requirement, without increasing the risk of theft.
10. The Commission was satisfied that the design changes and location of the cashiering facilities did not give rise to any issues of regulatory concern.

Decision

11. The Commission decided to approve the application for design changes, and the location of the principal public cashiering facility on Level 2 under condition 6 of SCAL's venue licence. The principal public cashiering facility is to be generally in accordance with the plans **attached** to this decision.
12. The Commission decided to amend condition 12 of SCAL's venue licence and condition 21 of SCML's operator's licence, to read as follows:

SCAL venue licence

- 12(i) The Licence Holder shall maintain at least one principal cashiering facility on each level of the gaming floor which is clearly visible to patrons. Each such cashiering facility shall as a minimum requirement include the following:
 - (a) accommodation for general cashiers;
 - (b) storage facilities for cashiering inventory;
 - (c) manually triggered and automatic silent alarm systems connected directly to monitor rooms of the surveillance department.
- (ii) The Licence Holder may provide accommodation for chip bank cashiers in the principal cashiering facility which shall be physically separate from general cashiers unless the Commission approves otherwise.
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SCML operator's licence

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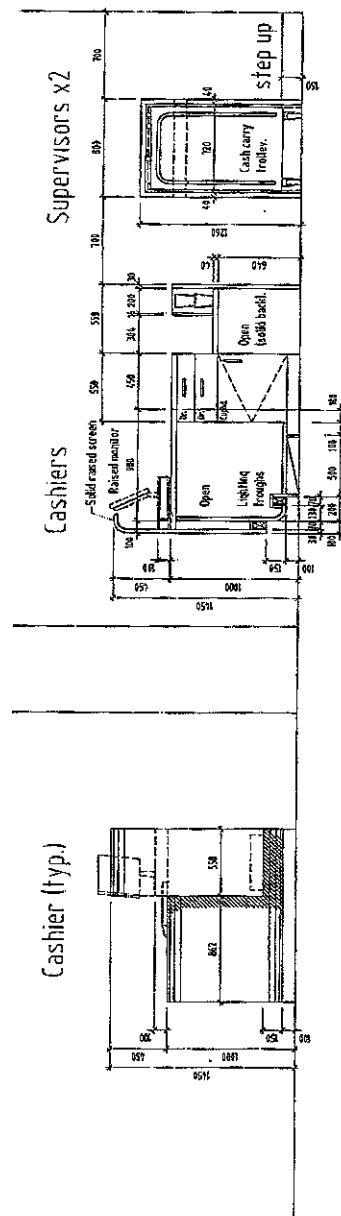
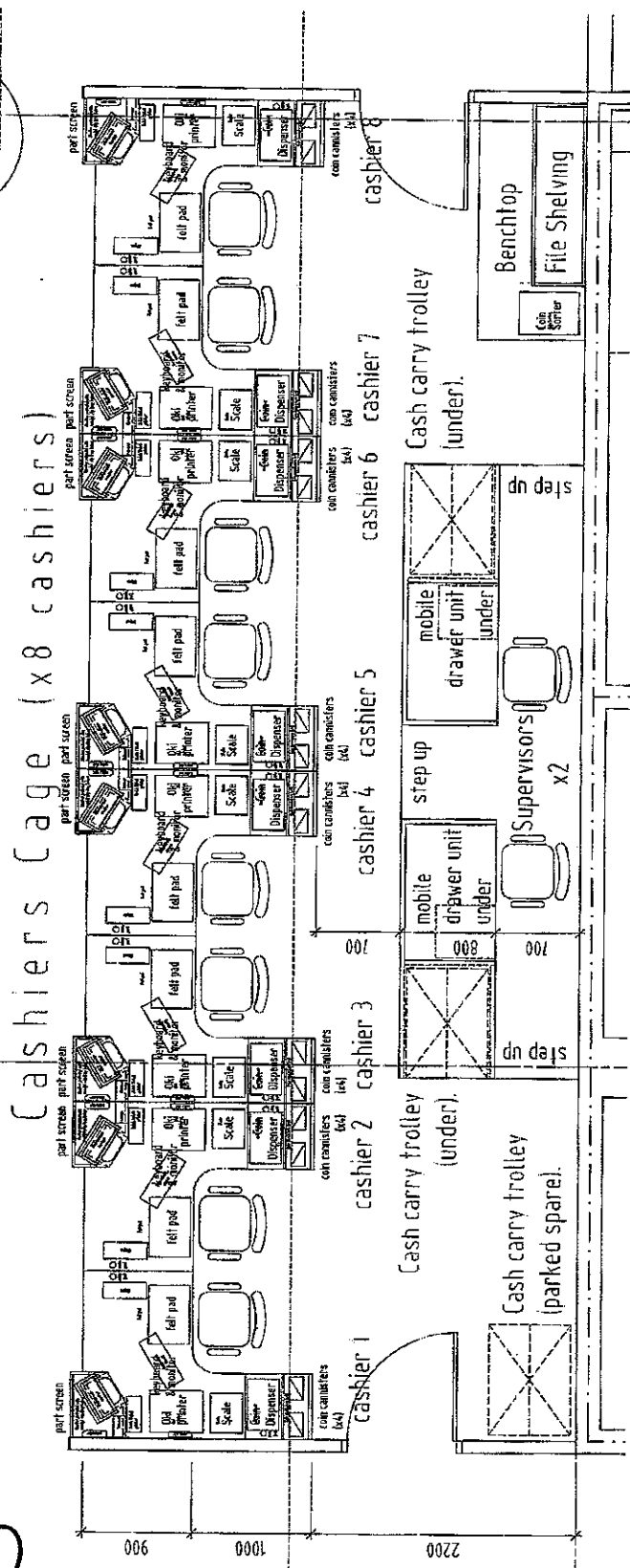
- (a) accommodation for general cashiers;
 - (b) storage facilities for cashiering inventory;
 - (c) manually triggered and automatic silent alarm systems connected directly to monitor rooms of the surveillance department.
- (ii) The Licence Holder may provide accommodation for chip bank cashiers in the principal cashiering facility which shall be physically separate from general cashiers unless the Commission approves otherwise.
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Peter Chin
Chief Gambling Commissioner

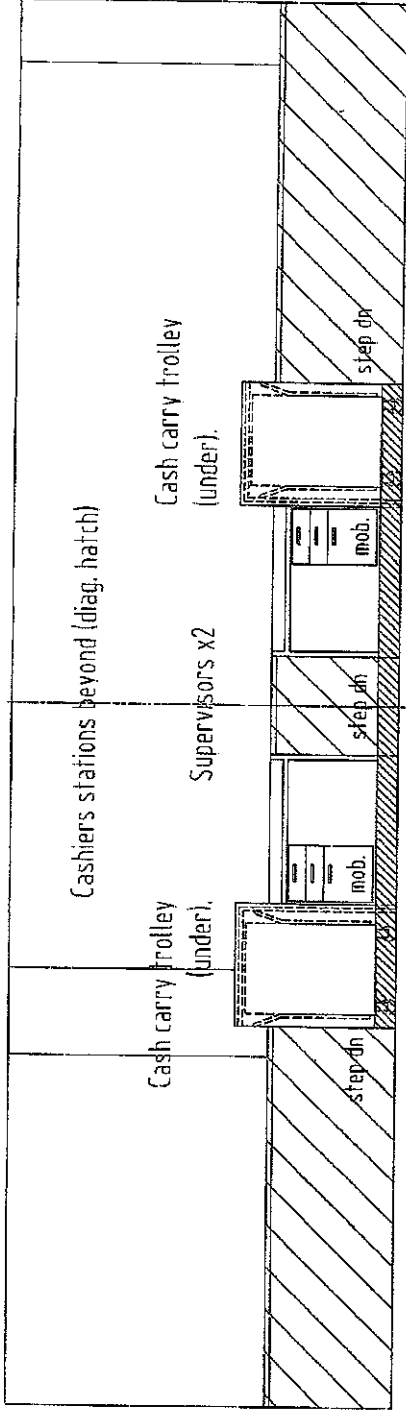
for and on behalf of the
Gambling Commission

20 October 2006

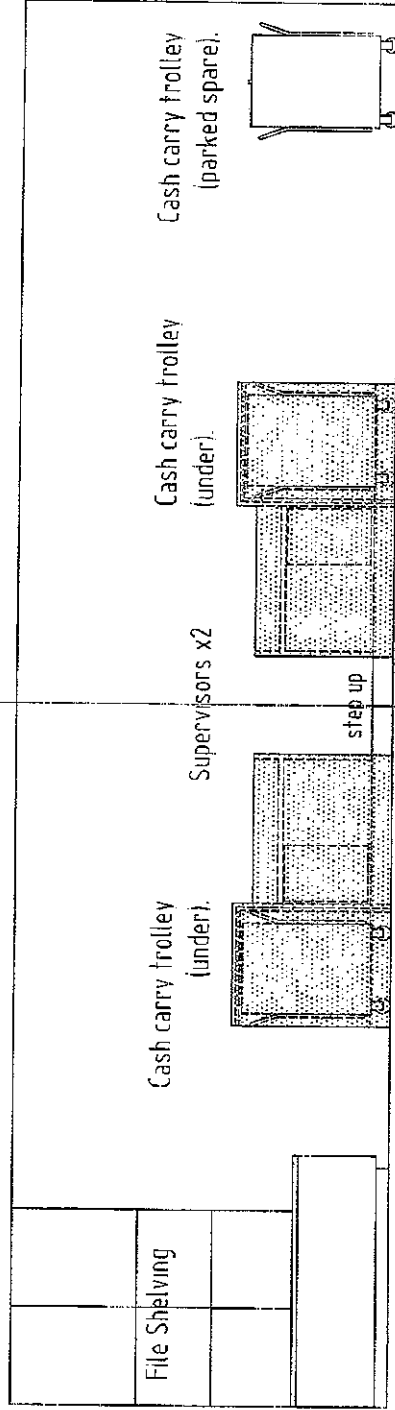


OPTION 1

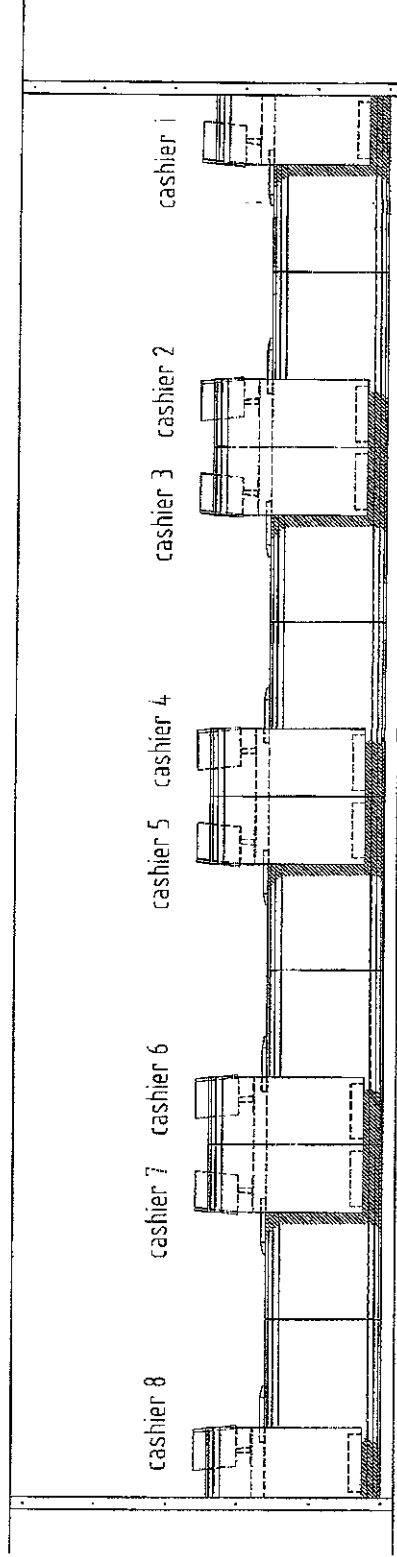
SKY CITY CASINO - Level 2
Proposed Cashiers Cage scale 1:20 @ A1 1:40 @ A3



Elevation from Supervisors side - scale 1:20 @ A1 1:40 @ A3



Elevation from Cashiers towards Supervisors - scale 1:20 @ A1 1:40 @ A3



Elevation towards Cashiers - scale 1:20 @ A1 1:40 @ A3