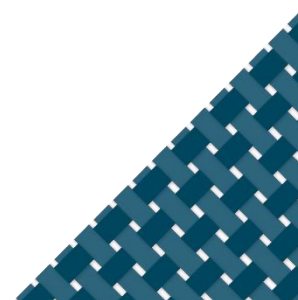


# **SkyCity Hamilton Casino**

## **Audit Report**

**Breach of Exclusion Audit 2022**



# Contents

- 1. **Purpose of the Audit**.....3
- 2. **Executive Summary** .....3
- 3. **Background** .....4
- 4. **Scope** .....4
- 5. **Methodology**.....5
- 6. **Strong Areas**.....5
- 7. **Weak Areas** .....5
- 8. **Audit Findings**.....6
  - Records of Excluded Patrons 6
  - Preventing Access to Prohibited Patrons 6
  - Breach of Exclusion Notifications 8
  - Patrons Breaching Exclusion Orders are Removed from the Premises 10
  - Standard Operating Procedures 10
  - Policy for Identifying Problem Gamblers 11
  - Exclusion Orders Issued to Problem Gamblers 12
  - Re-Entry Process 15
- 9. **Required Actions**.....16
- 10. **Appendices**.....16

## 1. Purpose of the Audit

The purpose of the audit is to ensure that SkyCity Hamilton Casino is adhering to its Breach of Exclusion (BOE) requirements and is operating in accordance with the Gambling Act 2003 (the Act), associated regulations, and the Minimum Operating Standards (MOS).

The audit will also help determine whether SkyCity Hamilton's BOE processes are robust and if staff who interact with gamblers have received the required standard of training around breaches of exclusion and identifying actual or potential problem gamblers.

## 2. Executive Summary

The Department has found that SkyCity Hamilton has processes in place that follow the requirements set out in the Act and the MOS for breaches of exclusion. Evidence obtained during the audit shows that these processes are being followed in practise.

The casino notified the Department within the required timeframe of all breaches of exclusion during the audit period. On two occasions, the casino notified the Department of a breach of exclusion but did not provide the required paperwork until a regulator requested it.

The required level of Harm Minimisation training has been provided to all casino staff involved in the BOE process.

The audit findings are summarised below:

Area	DIA finding/conclusion
Records of Excluded Patrons <a href="#">s312A</a> and MOS section 14	Achieved
Preventing Access to Prohibited Patrons <a href="#">s316</a> MOS section 40	Achieved
The Department is Notified of Breaches of Exclusion as Soon as Practicable <a href="#">s312</a> and MOS section 14	Achieved
Patrons Breaching Exclusion Orders are Removed from the Premises <a href="#">s311</a>	Achieved
Standard Operating Procedures	Achieved
Policy for Identifying Problem Gamblers <a href="#">s308</a>	Achieved
Exclusion Orders Issued to Problem Gamblers <a href="#">s309</a> and <a href="#">s310</a>	Achieved
Re-Entry Process <a href="#">s316(1)(e)</a>	Achieved

### 3. Background

SkyCity Hamilton Casino was licensed under section 37 of the Casino Control Act 1990 on 7 May 1998 and began operations in 2002. The holder of the operator's licence is SkyCity Casino Management Limited (SCML). The casino premises licence is held by SkyCity Hamilton Limited (previously known as Riverside Casino Limited). The Chief Executive Officer is currently Michael Ahearne.

The BOE process at SkyCity Hamilton is primarily the responsibility of the Host Responsibility team under the management of [REDACTED], and the Security team managed by [REDACTED]. The Host Responsibility team had consisted of one Host Responsibility Executive, [REDACTED], and the Host Responsibility Manager, [REDACTED], but a second Host Responsibility Executive and two Responsible Gambling Hosts have recently joined the team. There is also the potential for a third Responsible Gambling Host to join the team soon. The increased size of the Host Responsibility Team means they will take some of the responsibility for processing breaches of exclusion from the Security team. The breaches of exclusion that occurred during the period covered by this audit were dealt with by the Security team.

A desk-based Breach of Exclusion Notification audit was conducted on SkyCity Hamilton casino in 2020. This audit found that SkyCity Hamilton was meeting its MOS requirements for notifying the Department of breaches of exclusion, but it was only partially meeting its obligation to provide complete and accurate documentation.

### 4. Scope

The audit assessed SkyCity Hamilton's breach of exclusion processes. The following processes and procedures were within scope of the audit:

- Records of excluded patrons
- Breach of exclusion notifications
- Procedures to prevent access to prohibited patrons
- Policy for identifying problem gamblers
- Exclusion orders issued to problem gamblers
- People breaching exclusion orders are removed from the premises
- Re-entry process
- Standard operating procedures

#### **Out of scope**

- Full Host Responsibility Programme (HRP)
- All other breach notifications under the MOS, such as underage patrons or cheating

## 5. Methodology

Documentation was requested from the casino for the audit period 1 January 2021 to 30 June 2021. The initial documentation request was issued on 22 March 2022 to ██████████, Host Responsibility Manager at SkyCity Hamilton Casino, for the following:

- Casino records of every person issued with an exclusion order, including any re-entry conditions imposed, from 01/01/2021 to 30/06/2021
- A list of all breaches of exclusion for the period 01/01/2021 to 30/06/2021, including the incident reports
- A list of all breaches of re-entry conditions for the period 01/01/2021 to 30/06/2021, including the incident reports
- Daily security reports for the period 01/01/2021 to 30/06/2021
- The casino's policy for identifying problem gamblers and issuing exclusion orders
- Any policies or procedures the casino has specifically for identifying and interacting with excluded patrons attempting to enter the gaming area
- A list of casino staff who have completed their harm minimisation training, including the dates of completion and any refresher training
- A copy of the harm minimisation training provided to casino staff

The documentation provided was analysed and used to draft interview questions.

An onsite visit to the casino was conducted on 10 May 2022. During this visit the audit team conducted interviews with ██████████, Host Responsibility Manager, ██████████, Host Responsibility Executive, and ██████████ a Security Shift Manager. These interviews were recorded. The audit team also visited the surveillance room and discussed the Guardian facial recognition system with the staff member on duty, ██████████.

## 6. Strong Areas

SkyCity Hamilton has robust processes in place to ensure that excluded patrons are unable to access the gaming area.

When breaches of exclusion do occur, SkyCity Hamilton has implemented good processes to ensure that they notify the Department as soon as practicable.

## 7. Weak Areas

No areas were identified as weak during the audit.

# 8. Audit Findings

## Records of Excluded Patrons

Gambling Act (2003) s312(a) and MOS section 14	Achieved
--	----------

### Criteria

Assess whether the casino is maintaining current records of every person with an exclusion order, including any conditions of re-entry imposed on that person, in accordance with section 312(a) of the Act and section 14 of the MOS.

### Finding

The Department is satisfied that SkyCity Hamilton Casino is keeping records of excluded patrons in accordance with section 312(a) of the Act and section 14 of the MOS.

SkyCity Hamilton provided a spreadsheet that consisted of fifty-seven excluded patrons during the period 1 January 2021 – 30 June 2021 (Appendix A). The spreadsheet included the following information for each patron:

- The full name of the patron
- The date the exclusion was issued
- The incident report number
- The patron’s date of birth
- The patron’s address
- The type of exclusion
- The length of exclusion
- The re-entry conditions

### Conclusion

The Department found that SkyCity Hamilton Casino is keeping records of every person with an exclusion order according to the requirements of the Act and the MOS.

## Preventing Access to Prohibited Patrons

Gambling Act (2003) s316 and MOS section 40	Achieved
---	----------

## Criteria

Assess that the casino has procedures in place to ensure that persons who are prohibited by the Act do not enter the gambling area.

## Finding

The Department is satisfied that SkyCity Hamilton has robust procedures in place to ensure that persons who are prohibited by the Act do not enter the gambling area.

- SkyCity Hamilton utilise a mix of technology and staff awareness to prevent prohibited patrons accessing the gaming area.
- SkyCity Hamilton's Host Responsibility Programme requires that staff are vigilant about any potential excluded gamblers who attempt to re-enter the gaming areas. SkyCity Hamilton staff demonstrated good awareness of this responsibility during the interviews conducted as part of this audit.
- There is one entrance to the casino, and it is permanently staffed by security officers. Security staff are expected to familiarise themselves with the photos of excluded patrons, so they can recognise them without relying on facial recognition technology. To aid them, the security staff have access to a list of prohibited patrons and their photos, which they can access on a tablet while stationed at the main entrance.
- SkyCity Hamilton casino utilises Guardian facial recognition software. Video cameras scan customers as they approach the casino entrance and check them against their database of excluded patrons. If the scan of an approaching customer's face matches the record of an excluded patron an alarm is set off so that the security officers can prevent them entering the casino.
- During the audit we visited the surveillance room and spoke to the staff member on duty, [REDACTED]. [REDACTED] showed us how far away from the entrance the cameras start scanning patrons, which enables Guardian to identify prohibited patrons before they reach the gaming room entrance. [REDACTED] informed us that there is usually only one person on duty for the Hamilton surveillance team, and if that person is on a break or occupied with another task, the SkyCity Auckland surveillance team will take over monitoring the Hamilton system.
- If an excluded patron was identified at the casino entrance, they would be asked to confirm their identity. They would be denied entry and details of their attempt to enter the gaming floor would be recorded in iTrak. If the person denied being the excluded patron, they would be asked to leave until they could produce identification.
- Other casino staff are expected to help prevent prohibited patrons entering the gaming area. For example, if a gaming attendant suspected an excluded gambler had entered the casino, they are expected to contact security. Security would check the patron's identification to determine whether they were an excluded patron. If they were an excluded patron, security would invite them to an interview room and would go through the breach of exclusion process.

## Conclusion

The Department is satisfied that SkyCity Hamilton have procedures in place to ensure that persons who are prohibited by the Act do not enter the gambling area.

## Breach of Exclusion Notifications

Gambling Act (2003) s312 and MOS section 14	Achieved
---	----------

### Criteria

Determine whether the casino notified the Department as soon as practicable of any activity that may constitute an offense against s312(1).

Assess if the casino provided the required documentation to the Department with the breach of exclusion notifications.

### Finding

The Department found that SkyCity Hamilton notified the Department as soon as practicable of all breaches of exclusion during the audit period, but on two occasions the necessary paperwork was not provided until the Department requested it.

- There were 15 breaches of exclusion at SkyCity Hamilton during the period from 01/01/2021 to 30/06/2021. The casino notified the Department of all 15 breaches within the expected timeframe (Appendix B).
- The casino notified the Department of 12 of the 15 breaches within three hours of them occurring, and one within four hours of it occurring. The Department was notified of the other two breaches within 12 hours. Both these breaches occurred in the evening and the notification was sent to the Department early the next morning.
- SkyCity Hamilton provided the necessary paperwork for 13 of the 15 breaches of exclusion without prompting from the Department. The paperwork for the remaining two breaches was not provided until the Department requested it.
- For 9 of the 15 breaches during the audit period, the casino provided all the necessary paperwork with their initial notification email. In four cases the casino sent an initial email with the Subject Wanted notification and then within four hours sent a follow up email with the full paperwork.
- In his cover letter with the documents requested for the audit, ██████████ acknowledged the occasions when the casino had provided insufficient documentation with a breach notification during this audit period. He said that in response to these issues SkyCity initiated extra training and reminders to the staff of the importance of thorough checking of documentation (Appendix C).

- The casino's Exclusion Standard Operating Procedure stipulates what processes SkyCity personnel should follow when dealing with breaches of exclusion (Appendix D). It outlines the steps to be followed when interacting with the patron and has a section on what communication with the Department is required. The Exclusion SOP states that the Department should be notified as soon as possible and outlines what information should be left in the phone message if no gambling inspectors are available to take the call. The SOP then lists what documentation should be emailed to the Department.
- The Exclusion SOP states that the staff involved in the BOE process should have level 3 host responsibility training. The interviews with SkyCity personnel confirmed that it is mostly Security Shift Managers that deal with breaches of exclusion, but Host Responsibility Executives and Casino Shift Managers are trained to deal with breaches of exclusion should the need arise. The training registers SkyCity Hamilton provided demonstrate that all staff who dealt with breaches of exclusion during the audit period had the required level of training (Appendix E).
- The information about the BOE process provided through interviews conducted with SkyCity personnel was consistent with the material in the Exclusion SOP (Appendix F).
- The SkyCity Hamilton Breach of Exclusion Notification audit in 2020 recommended that the casino implement processes to ensure that all relevant paperwork is emailed to the Department within the required timeframe (Appendix G).
- SkyCity Hamilton now use a BOE 'cheat sheet' that provides a list of all the documentation staff should provide to the Department (Appendix H). The security team also has a review process at the change of shifts, which involves the incoming security staff reviewing the breaches that occurred in the previous shift and ensuring that the Department was notified and provided the required paperwork.
- SkyCity Hamilton's processes to ensure that correct documentation for breaches of exclusion is provided to the Department have improved since the audit in 2020. The audit in 2020 reviewed breaches of exclusion from 1 September 2019 to 1 March 2020 and found that for seven of the 19 breaches of exclusion, SkyCity Hamilton did not provide the required documentation to the Department. For the period of this audit, 01/01/2021 to 30/06/2021, SkyCity Hamilton did not provide the required documentation for only two of the 15 breaches. To assess whether this positive trend had continued, we reviewed the six most recent breaches of exclusion that occurred at SkyCity Hamilton and found that in all cases the casino provided the full paperwork without prompting from the Department.

**Conclusion**

The Department is satisfied that SkyCity Hamilton has robust procedures in place to ensure that the Department is notified as soon as is practicable of breaches of exclusion and that they have improved their processes for ensuring the correct documentation is provided.

**Patrons Breaching Exclusion Orders are Removed from the Casino**

<b>Gambling Act (2003) s311</b>	<b>Achieved</b>
---------------------------------	-----------------

**Criteria**

Determine if patrons who breached their exclusion orders were removed from the premises in accordance with section 311 of the Act.

**Finding**

The Department found that all patrons who breached their exclusion order during the audit period were escorted off the premises.

- SkyCity Hamilton Casino provided incident reports for the patrons who breached their exclusion conditions during the audit period (Appendix B). All fifteen reports were analysed, and it was found that in each instance patrons were escorted out of the Casino via the main entrance as soon as it was discovered that a breach had occurred, and the relevant interviews had taken place.

**Conclusion**

The Department is satisfied that patrons who breached their exclusion orders during the audit period were escorted off the premises as soon as possible.

**Standard Operating Procedures**

<b>Standard Operating Procedures</b>	<b>Achieved</b>
--------------------------------------	-----------------

**Criteria**

Obtain a copy of the casino’s Standard Operating Procedures relevant to breaches of exclusion and assess whether the casino has followed the processes they contain.

**Finding**

The Department is satisfied that SkyCity Hamilton has followed the processes set out in the Standard Operating Procedures.

- SkyCity Hamilton provided three Standard Operating Procedure (SOP) documents: Exclusion, Analysis and Intervention, and Information Collection and Collation.
- The Exclusion SOP specifies what processes SkyCity Hamilton personnel should follow when issuing exclusion orders, dealing with breaches of exclusion or re-entry conditions, and assessing re-entry applications. It also stipulates what level of training staff involved in these processes should have (Appendix D).
- The Analysis and Intervention SOP outlines the steps SkyCity Hamilton personnel take to assess the levels of risk of gambling harm for patrons. It also outlines the process taken to intervene with customers once this information has been analysed (Appendix I).
- The Information Collection and Collation SOP provides details of the information gathering and recording processes that help monitor patrons and assess whether they may be experiencing gambling-related harm (Appendix J).
- No inconsistencies were noted between the processes outlined in the SOPs and the information in SkyCity Hamilton’s problem gambler identification policy.
- The breach of exclusion notifications and paperwork from the audit period, and the information about the exclusion process SkyCity Hamilton provided for this audit demonstrates that they are following the processes contained in the SOPs. Information is being collected, analysed and used according to the Analysis and Intervention and the Information Collection and Collations SOPs, and exclusion orders or breaches are being processed according to the Exclusion SOP.
- SkyCity Hamilton staff were interviewed as part of this audit, and they demonstrated good knowledge of the processes outlined in the SOPs. None of the information SkyCity Hamilton staff provided during the interviews contravened the processes in the SOPs.

## Conclusion

The Department is satisfied that SkyCity Hamilton staff are aware of and have followed the processes set out in the Standard Operating Procedures.

## Policy for Identifying Problem Gamblers

<b>Gambling Act (2003) s308</b>	<b>Achieved</b>
---------------------------------	-----------------

### Criteria

Assess whether SkyCity Hamilton has a policy for identifying problem gamblers in accordance with section 308 of the Act.

## Finding

The Department is satisfied that SkyCity Hamilton has developed a policy for identifying problem gamblers in accordance with section 308 of the Act.

- As part of the document request for this audit, SkyCity Hamilton provided their Host Responsibility Programme (HRP) (Appendix K).
- Appendix B of the HRP is the Problem Gambler Identification Policy for SkyCity Hamilton, Queenstown and Wharf Casinos (PIPG).
- The PIPG is 14 pages long and is divided into six sections: Definition of a Problem Gambler; Indicators of Problem Gambling; Sources of Indicator Data; Identification; Record Keeping; and Review.
- The PIPG contains extensive details of the definition of a problem gambler, how to identify actual or potential problem gamblers, and how to record, assess and act on that information.
- The PIPG states that the Information Collection and Collation, Analysis and Intervention, and Exclusion SOPs provide operational guidelines for the policy's implementation.
- The last section in the PIPG states that the policy will be measured and reviewed as part of the HRP. However, it also states that if new evidence emerges in relation to indicators of harm, then SkyCity will review its PGIP accordingly.

## Conclusion

The Department has found that SkyCity Hamilton meets the requirement to develop a policy for identifying problem gamblers.

## Exclusion Orders Issued to Problem Gamblers

**Gambling Act (2003) s309 and s310**

**Achieved**

### Criteria

Ensure that the casino is issuing exclusion orders to identified problem gamblers and is taking all reasonable steps to assist patrons the casino holds concerns for.

### Finding

The Department is satisfied that SkyCity Hamilton casino is issuing exclusion orders to identified problem gamblers under sections 309 and 310 of the Act.

- The casino's processes for identifying problem gamblers and issuing them exclusion orders are detailed in the Analysis and Intervention, the Collection and Collation, and the Exclusion Standard Operating Procedures. Casino staff use these SOPs in conjunction with the Problem Gambler Identification Policy (PGIP).
- The Analysis and Intervention and the Collection and Collation SOPs provide details of the processes SkyCity Hamilton staff should follow for recording information about observations, interactions and ongoing monitoring of potential problem gamblers. These SOPs contain details of how Gambler of Interest (GOI) files are created and how the patron should be monitored.
- When casino staff observe a Problem Gambling Indicator (PGI) they are expected to have an interaction with the patron, which should at least involve enquiring after the patron's wellbeing, and might entail offering them host responsibility material. Depending on the severity of the problem gambling signs and what the patron says during the interaction, the incident could be escalated. The observation of any of the 5 red flags (strong problem gambling signs) should result in an immediate escalation. These interactions should be entered in iTrak regardless of whether the incident was escalated.
- Escalation entails getting Host Responsibility, a Security Shift Manager, or a Casino Shift Manager involved. These positions have a higher level of host responsibility training and are able to issue exclusion orders should the patron request one or if they determine that a SkyCity exclusion is required.
- It is the duty of the Host Responsibility team to review incidents recorded in iTrak and assess whether a GOI file should be created for the patron. GOI files are always created when re-entry is granted to a patron whose exclusion has finished. When a patron's exclusion has expired and they apply for re-entry, Host Responsibility checks that the patron has met any conditions that were attached to the exclusion and does a re-entry interview in person or over the phone. The patron is also asked to provide documents to demonstrate they have met exclusion conditions such as attending a set number of counselling sessions.
- GOI files are monitored by Host Responsibility, which can involve a Host Responsibility Executive calling the patron to check on their wellbeing and asking how they feel about their level of gambling. The monitoring also involves the use of reports about gaming spend and time of play to assess the patron's gambling behaviour, and Host Responsibility may also interact with the patron in person when they come to the casino.
- The GOI files are reviewed monthly but can be reviewed weekly and fortnightly if Host Responsibility assess the patron as higher risk. Host Responsibility also conducts 12- and 24-week assessments of GOI files, which allows them to assess changes in behaviour over time. The reviews involve assessing how much money the patron has spent, how many times they have visited the casino, whether they have adhered to the conditions of their re-entry plan should they have one and examining any incidents that have been reported in iTrak.

- When a patron has been identified as a problem gambler, either through self-identification or through the observation of problem gambling signs, the casino issues an exclusion order.
- The Exclusion SOP contains the process that SkyCity Hamilton casino staff follow for issuing exclusions under sections 309 and 310 of the Act. The SOP contains the step-by-step process casino staff should follow when issuing on- and off-site self-exclusion orders, and on- and off-site SkyCity (third party) exclusions.
- If a patron enters the gaming area after completing their exclusion period but not the re-entry process, they will be issued with a First and Final Warning. If they are found in the gaming area again without having completed the re-entry process, they will be offered self-exclusion and, if self-exclusion is declined, will be issued a third-party exclusion for two years.
- If a patron completes the re-entry process but deviates from the time of play or spend limits, there will be an interaction with the patron that involves a welfare check, a reminder of the limits the patron agreed to and the issuance of a verbal warning. A second deviation will result in another interaction and verbal warning and a third deviation will result in a 30-day standdown period where the patron is not allowed to visit the casino at all. After the 30-day standdown period has finished, if the patron deviates from their re-entry conditions again they will be offered self-exclusion and if they do not take one, will be SkyCity excluded.
- SkyCity Hamilton casino has 3 levels of Host Responsibility Training (HRT): Introduction (level 1), Intermediate (level 2), and Mastery (level 3). The level of training that casino staff receive is dependent on their role. The Exclusion SOP states that casino staff involved in the exclusion process (issuing exclusions or dealing with breaches) must have level 3 training.
- SkyCity Hamilton provided spreadsheets with the lists of staff who have received each level of training. We compared this list to the incident reports for the breaches of exclusion that occurred during the audit period and found that all the breaches were dealt with by an appropriately trained staff member (Appendix E).
- SkyCity Hamilton personnel demonstrated good knowledge of the processes in the SOPs during the interviews conducted as part of this audit.
- SkyCity Hamilton issued 57 exclusions during the audit period: 44 self-exclusions and 13 SkyCity exclusions. All the SkyCity exclusions were issued with the condition that the patron must attend at least six counselling sessions and have no breaches in the six months prior to applying for re-entry. The self-exclusions were issued with the condition that there was no breach in the six months prior to applying for re-entry.

**Conclusion**

The Department is satisfied that SkyCity Hamilton issues exclusion orders to identified problem gamblers under sections 309 and 310 of the Act and takes all reasonable steps to assist a person they hold concern for under section 309A of the Act.

**Re-Entry Process**

<b>Gambling Act (2003) s316(1)(e)</b>	<b>Achieved</b>
---------------------------------------	-----------------

**Criteria**

Assess the process SkyCity Hamilton follows to allow an excluded gambler to re-enter the gambling area in accordance with section 316(1)(e) of the Act.

**Finding**

The Department is satisfied that SkyCity Hamilton has re-entry conditions in place for every patron who has either self-excluded or been SkyCity excluded in accordance with section 316(1)(e) of the Act.

- The Exclusion SOP contains the process SkyCity Hamilton staff follow for assessing applications for re-entry. The SOP states that re-entry applications are assessed by the Host Responsibility team and the information they assess depends on the conditions of the exclusion order.
- The applicant must have no Requirement to Leave Premises (RTLTP) or Trespass notices in force, have completed the re-entry application form, and have met any other re-entry conditions imposed by SkyCity. The most common additional re-entry conditions are that the applicant has not breached their exclusion within six months of applying for re-entry and/or that they have attended at least six counselling sessions prior to their application.
- SkyCity Hamilton provided a spreadsheet of individuals who were excluded during the audit period, and it consisted of 13 SkyCity excluded patrons and 44 self-excluded patrons. The re-entry conditions for the self-excluded patrons were that they had no breaches within six months of their application, and for the SkyCity excluded patrons the conditions were that they had attended at least six counselling sessions and had no breaches in the six months prior to applying for re-entry.
- We interviewed Host Responsibility Executive [REDACTED] and the information he provided about the re-entry process matched the contents of the SOP. [REDACTED] stated that on average he receives one re-entry application a month. He advised that once a patron enquires about re-entry, he/she is requested to fill out a re-entry application. The application is assessed, and an in-person or telephone interview may be deemed necessary. The need for an interview is determined on a case-by-case basis. If an interview is conducted, a file note of the interview should be included on the applicant’s file. The applicant’s mentor, if they nominated one when they took out their exclusion order, is sometimes contacted to verify the information provided by the patron.

- Once the Host Responsibility Executive has assessed all the relevant information, they make a recommendation on the application to the Host Responsibility Team Leader.
- Once re-entry is granted, a Gambler of Interest (GOI) file is automatically created, and the patron is monitored for six months. The GOI's gaming is assessed on a monthly basis but if they are classified as a high-risk individual, their gaming can be monitored on a weekly basis. iTrak notes are added in the system along with risk and harm assessment reports. If there are no concerns found with the gaming pattern of the patron, the GOI file is closed after manager's approval.

## Conclusion

SkyCity Hamilton has sound processes in place to interview and assess previously excluded patrons before allowing them to re-enter the gaming area.

## 9. Required Actions

No required actions were identified during the audit.

## 10. Appendices

Appendix	Title/Document number
A	<a href="#">SkyCity Hamilton Exclusions</a>
B	<a href="#">SkyCity Hamilton Spreadsheet of Breaches of Exclusion and Incident Reports</a>
C	<a href="#">SkyCity Hamilton BOE Audit Cover Letter</a>
D	<a href="#">SkyCity Hamilton Exclusion SOP</a>
E	<a href="#">SkyCity Hamilton Staff Training Spreadsheets</a>
F	<a href="#">Interview with Host Responsibility Manager, Interview with Host Responsibility Executive, Interview with Security Team Leader</a>
G	<a href="#">SkyCity Hamilton Breach of Exclusion Notification Audit 2020</a>
H	<a href="#">SkyCity Hamilton Exclusions Cheat Sheet</a>
I	<a href="#">SkyCity Hamilton Analysis and Intervention SOP</a>
J	<a href="#">SkyCity Hamilton Information Collection and Collation SOP</a>
K	<a href="#">SkyCity Hamilton Host Responsibility Programme</a>