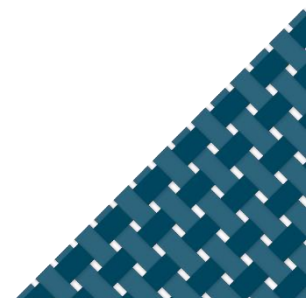


SkyCity Queenstown

Audit Report

[Cashiering procedures and handling of money 2021/2022]



Contents

- 1. Purpose of the audit 3**
- 2. Executive summary 3**
- 3. Background..... 4**
- 4. Scope 4**
- 5. Methodology 5**
- 6. Strong areas..... 7**
- 7. Weak areas 7**
- 8. Audit Findings..... 8**
 - Deposit/Front Money Accounts 8
 - Transfer of Money 11
 - Cash Handling and Management Procedures 14
 - Chip Purchasing Vouchers 17
 - Surveillance and Monitoring 18
 - Harm Mimimisation Processes 21
 - Cashless Gambling 24
- 9. Required actions and recommendations 26**
- 10. Appendices 27**

1. Purpose of the audit

The purpose of the audit is to ensure that SkyCity Queenstown Casino is following the Minimum operating procedures (MOS) for:

- Cashiering procedures
- Handling, collecting, counting and moving money and chips
- Targeted Chip stock
- Ensuring the origin of front money are from legitimate source of funds

The audit will also help determine whether SkyCity Queenstown’s cashiering processes are meeting their harm minimisation obligations around their cashiering function.

2. Executive summary

The Department has found that SkyCity Queenstown has processes in place that follow the requirements set out in the MOS for cashiering procedures. Evidence obtained during the audit shows that these processes are being followed in practise. A few examples were identified where there are deviations in practise from the documented procedures. These are not inconsistent with the requirements of the MOS but recommendations have been made to update the documented procedures in these cases to reflect what occurs in practise.

Harm minimisation training has been provided to all cashier staff and evidence was obtained that demonstrated the cashier staff utilize this training to identify signs of problem gambling and then follow the documented escalation process. SkyCity Queenstown has introduced a number of measures that assist their staff in implementing harm minimisation.

The audit findings are summarised below:

Area	DIA finding/conclusion
Deposit Accounts/Front Money Accounts	Achieved
Transfer of money	Achieved
Cash handling and management procedures	Achieved
Chip Purchasing Vouchers	Not assessed
Surveillance and monitoring	Achieved
Cashless gambling	Achieved
Harm minimisation process	Achieved

3. Background

SkyCity Queenstown Casino was licensed under section 37 of the Casino Control Act 1990 on 7th of May 1998. The holder of the operator’s licence is Sky City Casino Management Limited (SCML).

The casino premise's licence is held by Queenstown Casinos Limited.

The Chief Executive Officer is currently Michael Ahearne.

The most recent audits conducted by the Department at the casino have found them to be generally meeting the requirements in the areas assessed.

A desk-based Breach of Exclusion Notification audit was conducted in 2020 and found that SkyCity Queenstown had sound procedures in place in this area.

The Department conducted an audit of the implementation of the Host Responsibility Programme at SkyCity Queenstown Casino and the Wharf Casino in 2019. The audit assessed SCML as generally meeting their compliance requirements but did identify several areas that required improvement.

The most recent cashiering audits at SkyCity Queenstown casino were undertaken in 2017 and 2016. These audits found that SkyCity Queenstown had in place sound processes to address areas of risk.

4. Scope

The audit assessed SkyCity Queenstown's cashiering processes. The following processes and procedures are within scope of the audit:

- The transfer and handling of money and chips by SkyCity Queenstown.
- The security of money and chips within SkyCity Queenstown.
- The use of Chip Purchasing Voucher's (CPV).
- The use of cashless gambling, in particular ticket-in and ticket-out (TITO) systems.
- The origin and legitimacy of funds used in front money.
- Identification of suspicious activity within the scope of the audit.
- Harm minimisation training and its implementation within the cashiering space.

Out of scope

- Full Host Responsibility Programme (HRP) for cashiering.
- Full Chip stock audit.

5. Methodology

An initial meeting was held by zoom on 22 February 2022 between the audit team and Jonathan Browne, General Manager of SkyCity Queenstown, ██████████, Gaming and Cage Manager and ██████████, Anti-Money Laundering Compliance and Intel for SkyCity Entertainment Group. Enquiries were made to establish what documentation would be required for the audit and allowed the team the opportunity to obtain an overview of the cashier processes at the casino.

Documentation was requested from the casino for analysis for the Audit period 1 July 2020 to 30 June 2021. The initial documentation request was issued on 25 February 2022 to SkyCity Queenstown Casino for the following:

Deposit Accounts/Front money accounts

- Any policies and procedures (including accounting procedures) SkyCity Queenstown Casino has if a customer were to set up a deposit account or front money account.
- Any policies or procedures SkyCity Queenstown casino has for customers utilizing deposit or front money accounts on premises that were opened at other SkyCity casinos.

Transfer of money

- Copy of Standard Operating Procedures (SOP) for transferring money between gaming tables and places for counting.
- Copy of SOP for depositing money into bank accounts.
- Any documents that record these transfers.

Cash handling and management procedures

- Copy of SOP for cash handling and management procedures.
- Any documents that record these processes.

Surveillance and monitoring

- Copy of SOP's for surveillance and monitoring related to the handling of cash and chips.
- Any documents that record these processes.
- A report of all reported suspicious activity related to cash-handling for the audit period.

Harm minimisation process

- A copy of the online module of Host responsibility training given to cashier staff.
- A list of cashier trained staff at Queenstown Casino.
- Copy of SOP on how to identify possible gambling harm, and what to do when those harms are identified.

Cashless gambling

- If cashless gambling is conducted, a copy of SOP for the use of ticket-in ticket-out systems or player loyalty account based cashless gambling technology.
- Any documents that record these processes, including any occurrence of suspicious activity or gambling harm identified and the result of those investigations.

Variations

- List of all cashiering variations for the audit period and any documentation related to investigations into these variations.

A second document request was sent on 28 March 2022 for the following:

- Any SOP or documented procedure that the Cashier Department has for cashier variations and how these are dealt with (if there is anything else distinct from SOP 11.05 which is for surveillance).
- Any SOP or other documented procedure for the transfer of money from EGMS to the count area to be counted (including the drop and count).
- Any SOP or other documented process for the movement, storage and inventory of chips.
- Any SOP or documented procedures relating to the movement of money from cashier areas to the gaming areas (including tables and EGM's).
- Any SOP or documented procedures relating to the transactions involving the movement of funds to or from the main bank.
- An example of a TITO ticket used at SkyCity Queenstown.
- The documents listed under 'Document No' from the 'Main Bank Transfers- FY21' document previously provided for the month of June 2021.
- The documents listed under 'Document No' from 'Cash to Bank Report F21' for the months April 2021 to June 2021

The last three items were supplied to the audit team while on site. Interview questions were drafted from the supplied documentation.

An onsite visit to the casino was conducted from 5-7 April 2022. During this visit the audit team conducted interviews with [REDACTED] Security, Surveillance and Host Responsibility Manager, and two cashiers [REDACTED] Marcus Reynolds, Head of Host Responsibility, and [REDACTED] were also present during some of these interviews. These interviews were recorded and later transcribed. The audit team also checked invoice documentation onsite against reports provided for excess funds being transferred to the casino's outside bank for the months of April to Jun 2021 and transfers to the main bank for June 2021. The audit team observed the table count and buy process on 5 April 2022.

6. Strong areas

- SkyCity Queenstown has robust processes in place to ensure that funds are securely held and transported onsite which minimises opportunities for theft, fraud or other dishonesty.
- SkyCity Queenstown management has introduced a number of measures to assist their staff in monitoring for problem gambling. As a result, the cashier staff have a thorough understanding of what signs to look for and how to implement these procedures in practise.

7. Weak areas

- No areas were identified as weak during the audit.

8. Audit Findings

Deposit Accounts/Front Money Accounts

Schedule 2: Gambling Act (2003)- (S2.1) (S2.15)

Achieved

Criteria

- Test assertions of the transactions of deposit accounts/front money accounts and accounting procedures (S2. 1).
- Assess the establishment and use of deposit accounts/front money accounts (S2. 15).

Finding

The Department is satisfied that SkyCity Queenstown has sound processes in place for the establishment and use of Deposit/front money accounts.

- As advised by [REDACTED] on 22 February 2022 (Appendix A) no deposit or front money accounts are held at SkyCity Queenstown. [REDACTED] noted that there was a patron who had opened a deposit account at SkyCity Auckland that had withdrawn from the deposit account while at SkyCity Queenstown but had not done so for a long time.
- [REDACTED] advised that he believed the last time a patron accessed money held at deposit account from another SkyCity casino was to purchase TITO tickets to play EGMs (Appendix B).
- SkyCity Queenstown has a documented standard operating procedure for patrons requesting a transfer of funds from a deposit account held at another Skycity Casino and SkyCity Queenstown (Appendix C). The customer is required to provide their premier card number, appropriate identification and to complete a Multi-site deposit account form. The cashier involved with the transaction would need to confirm the patron's premier card was Customer Due Diligence (CDD) compliant. The cashier would also send an email to Auckland VIP cage supervisors/Hamilton Cage Management to confirm.

Transfer of Money

Schedule 2: Gambling Act (2003)- (S2.7) (S2.8) (S2.10)

Achieved

Criteria

- Targeted assessment of the transfer of money from the gaming tables and other places where games are conducted to other areas for counting (S2.7).
- Targeted assessment of the transfer of money to a gambling area (S2.8).
- Assess the transfer of money to and from a bank (both Domestic and International) (S2. 10) (s.185 of the Act).

Finding

The Department is satisfied that SkyCity Queenstown has processes in place to ensure that funds are securely transported and held and that opportunities for theft, fraud or other dishonesty are limited by these procedures.

- [REDACTED].
- SkyCity Queenstown has documented standard operating procedures for these two processes (Appendix E and F).
- [REDACTED] (Appendix B).
- [REDACTED]
- Surveillance Daily logs (Appendix G) for the audit period have 232 records recorded for NAD drops (34) and soft (paper money) drops (198).

[REDACTED]

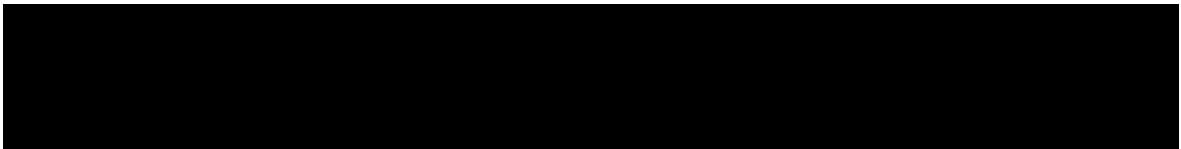
[REDACTED]

[REDACTED]

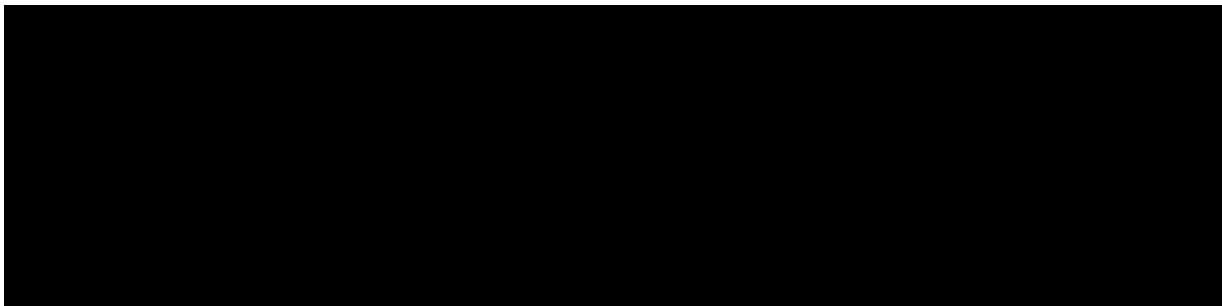
- Information provided through Interviews conducted with two cashier staff (Appendix I and J) was consistent with the documented drop processes.



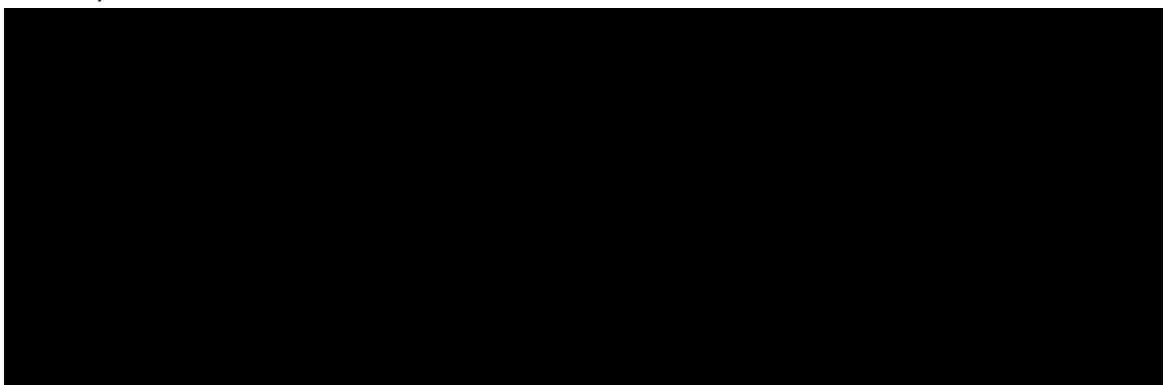
- Two of the surveillance daily log entries (Appendix G) for the audit period relate to CRT fills (DL2020075369 and DL 20210046512).



- SkyCity Queenstown has a documented process for when excess funds are banked (Appendix L). This involves ACM personnel (the New Zealand division of Linfox Armaguard) collecting the funds from the casino.



- During the onsite portion of the audit; the audit team sighted the documentation related to three months (April-June 2021) worth of cash to bank transfers. The correct documentation was present and corresponded to the details provided by the casino in report form for cash to bank transfers for the audit period (Appendix M).



Conclusion

The Department is satisfied that SkyCity Queenstown has robust policies in place to ensure that funds are securely transported and held while in the Casino.

Cash Handling and Management Procedures

Minimum Operating Standards – (34) (38) (60) (61) (62) (94)
Schedule 2: Gambling Act (2003) – (S2. 1) (S2. 4) (S2. 9) (S2. 13)

Achieved

Criteria

- Evaluate the cash handling and management procedures covering any deposit, withdrawal, exchange, irregular transactions, significant pay-out or transfer of funds (MOS 34, 38, 60, 61 & 62).
- Targeted assessment of large discrepancies (S2. 9) (MOS 94).
- Check process and procedures of payment and recording of winnings. If winnings are paid by cash an assessment of the cash facilities (S2. 1, 4, and 13).

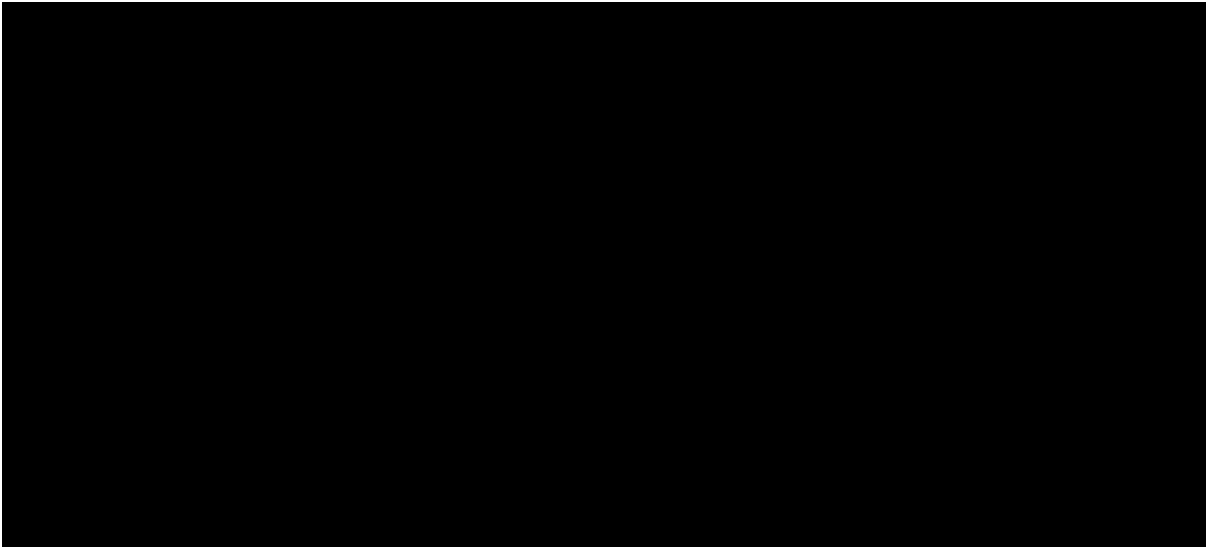
Finding

The Department is satisfied that SkyCity Queenstown meets the requirements under the MOS for Cash Handling and Management Procedures.

- 69 surveillance daily log entries (Appendix G) during the audit period specifically relate to Access notifications. Most of these specifically mention cleaning or maintenance services being performed (eg DL20210031842, DL20210095102, DL20210018153).

- On 5 April 2021 during the onsite audit ██████████ called surveillance to advise that members of the audit team would be in the count room on two occasions once during a tour in the morning and once during the count in the afternoon. The Daily log entries set through from Surveillance for that day included entries for both of these occurrences as well as one from earlier in the day when ██████████ advised the Hub in Auckland that five DIA staff members would be onsite (Appendix N).
- ██████████ advised that the main bank is counted and reconciled on a daily basis (Appendix B). This is consistent with the requirement under section 61(b) of the MOS.
- As part of the document request a report was provided showing transfers to and from the main bank at Skycity Queenstown for the audit period. This report showed that each transaction included reference to a document number. While onsite the audit team viewed all the document related to transactions for the month of June 2021 and found that these were present (Appendix O). This is consistent with the requirement from section 61(a) of the MOS that all movement to and from the main bank are supported by documentation.
- The cashiering department has standard operating procedures in place relating to how cashier variances are managed (Appendix P).
- Any cashier with a variance of over \$50 must complete a double check of their drawer to try and establish how it occurred.
- If the cashier cannot establish and resolve the variance they notify surveillance, cage supervisors and revenue audit via email.
- The information provided (Appendix I and J) by the two cashiers interviewed on site was consistent with the SOP.
- The following day either ██████████ or the incoming cashier if he is not available will complete a full review of the window including all monies, chips and vouchers to try and establish how the variance occurred.
- All paperwork is collated and sent to Surveillance.
- Surveillance have their own SOP (Appendix Q) which states that all cashier variances over \$100 or more must be reported to them and they may conduct a review.
- Variances are entered into the 'variance' folder in the G drive until such a time as they are resolved.
- The information from this folder was provided (Appendix R) and reviewed for the audit period
- 28 variances were recorded. Total variances were \$6,696.64.
- Only one variance was not reported to Surveillance. This was for \$30 and therefore under the limits advised in the SOP's
- Surveillances investigations were conducted into 12 of the variances.
- Four of the variances could not be resolved or had no further action. All of these were for \$100 or less.
- ██████████ advised that for any variances over \$500 he will investigate and send a report to the General Manager and DIA.

- ██████ advised that variances over \$500 was very rare and estimated that there had been around 2-3 over the previous year.
- A check of the Casino Notification inbox was conducted for the last year which identified two emails from ██████ advising the Department of variances over \$500. One from 21/09/21 and the other from 30/11/21. Both of these included full investigation reports into the variances (Appendix S).
- ██████ advised that if a variance was considered suspicious he would get the transactions to be fully looked at by surveillance and then ask surveillance to complete some proactive monitoring of that cashier.



Conclusion

The Department has found that SkyCity Queenstown has sound policies in place in relation to cash handling and management procedures. The Recording and Viewing Cashier Variances Cashier SOP does not include reference to suspicious variances needing to be reported to the Department as soon as practicable so it has been recommended that this is added.

Chip Purchasing Vouchers

<p>Minimum Operating Standards – (63) (64) Schedule 2: Gambling Act (2003) – (S2. 4) (S2. 14)</p>	<p>Not Applicable</p>
---	-----------------------

Criteria

- Assess all transactions, documentation and due diligence tests completed on CPV’s (S2. 14) (MOS 63 and 64).
- Assess the redemption of chips against the validity of the CPV and due diligence tests (MOS 65) (S2. 4).

Finding

SkyCity Queenstown does not use chip purchasing vouchers so this area was not assessed by the Department.

- [REDACTED] advised (appendix A) that Chip Purchasing Vouchers are not used at SkyCity Queenstown and have not been in use for a long time. Instead, patrons can purchase chips directly from the cashiers.

Conclusion

This area has been marked as not applicable.

Surveillance and Monitoring

Minimum Operating Standards – (55) Schedule 2: Gambling Act (2003) – (S2. 2 - S2. 9) (S2. 16) (S2. 17)	Achieved
---	-----------------

Criteria

- Ensure Surveillance monitors, and reviews Counts, Drops, Fills and Credits activities and transactions in the cage, chip banks, cage booth and count room (MOS 55) (S2. 2 – 9, 16 and 17).

Finding

The Department is satisfied that Surveillance monitors cashier procedures and processes at SkyCity Queenstown.

- Surveillance has an overall standard operating procedure (SOP 11.07) which relates to the monitoring of activities and transactions that occur in the cashier cages, Count Rooms, Main Banks and Chips Banks to ensure that they are not the subject of theft, fraud or other dishonest activities (Appendix T).

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

- 160 surveillance proactive audits (appendix G) are listed for the audit period

- 24 records have sublocation of soft count (1x procedural violation noted on 31/12/2020 with cashier █████ failed to inform Surveillance before entering the count room to do the soft count buy. Surveillance followed this up by contacting █████ [Security and Host Responsibility Manager] to enquire if he received a call from █████ to say she would be entering the room but he advised he was not informed). All other records had nothing untoward to report.
- 12 records with sub-location soft drop. Nothing untoward to report from all.
- Eight records with sub-location NAD (EGM) Count. Nothing untoward to report in all records.
- Three records with sub-location NAD (location listed as Finance drops). Nothing untoward to report in all records.
- One record for sub-location Chip Bank Room. Nothing untoward to report.
- 107 records for location Finance-Cash desk (including sub-locations CD1, CD2, QC01 and QC02).

For CD2 one of the 61 records noted a procedural violation (15/12/2020). Also, of interest is an entry on 10/03/2021 notes: Monitored several eftpos transaction where the cashier handed out a Host Res card due to the amount of transaction conducted followed by a Daily log completed. Entry on 21/09/2020 notes: Not all Eftpos transactions could be verified due to limited camera coverage of the Eftpos terminal.

Three records for CD1, nothing untoward to report from these.

Two records from QC01, nothing untoward to report.

37 records for QC02 three of these included procedural violations. 07/10/2020 notes: "A cashier was twice observed failing to properly count out banknotes. A cashier was observed conducting transactions in Bally Cage while another cashier was still logged in. A cashier was observed failing to process a TITO until he had already paid it out." 02/12/2020 Notes "Observed █████ commencing Cashier duties without logging himself in, into the Bally Cage System. SSM advised. Details in violation." 03/12/2020 Notes: "Observed █████ commencing duties and conducting transactions with █████ Log in at Bally Cage Application. Cage was advised. Staff was spoken to. Details in violation." Also of note was different entry for 03/12/2020 "Unable to verify all Eftpos transactions due to placement of the Eftpos terminal."

- Nine other entries with no sub-location and were for general monitoring of the cage and cash desks. Nothing untoward to report from this.
- Five entries were listed as finance-general cashiers Nothing untoward to report from these.
- While on site the audit team observed the table count (soft count) on the 05/04/22. The staff members conducting the count called and advised Surveillance that they were about to enter the count room and conduct the count and called surveillance again to advise when they were finished with the count. █████ called through to surveillance when about to enter the count room to commence the buy (Appendix U).

- The surveillance daily log entries for the audit period (Appendix G) were also reviewed:
 - 206 entries relate to the soft drop.
 - 167 entries relate to commencing a table or NAD count.
 - 22 entries relate to cash or chip transfers.
 - 118 entries relate to chip rotation.
 - Two entries relate to a fill (NXT and CRT machine).
 - 196 entries relate to a soft count buy.
 - Three entries relate to an NAD buy.
 - Nine entries relate to variances.

Conclusion

The Department is satisfied that the SkyCity Surveillance Department monitors, and reviews Counts, Drops, Fills and Credits activities and transactions in the cage, chip banks, cage booth and count room at SkyCity Queenstown.

Harm Minimisation Processes

Minimum Operating Standards – (29) Schedule 2: Gambling Act (2003) – (S2. 4) Host Responsibility Programme	Achieved
--	-----------------

Criteria

- Targeted review of staff training records and interview staff on their current Harm Minimisation practices and application of this training at the Cashiering desk (S2. 4, and 9) (MOS 29).

Finding

The Department is satisfied that cashier staff at SkyCity Queenstown are trained in harm minimisation/host responsibility and cashier staff use their training in practise.

- ██████████ advised (Appendix B) that cashier staff receive host responsibility training as soon as they are onboarded. Marcus Reynolds advised that Host responsibility one would be completed by all staff and Host responsibility two or three would be completed depending on the staff's level. The SkyCity Queenstown host responsibility program (Appendix V) shows that level 2 is required to be completed by supervisors and level 3 is for selected senior employees who may be expected to deliver interactions with customers. Host responsibility one is an e-learning module and two and three are delivered face to face.
- Andrew Gray advised that all of the cashiers would have undertaken level 2 and that ██████████ Security, Surveillance and Host Responsibility Shift Manager, would have taken them through it as Host Responsibility is part of their areas of responsibility. Refreshers are conducted on an annual basis.

- A review of the Host Responsibility training records (Appendix W) for cashier staff was conducted:
 - All full-time cashier staff and staff cross-trained to provide breaks had received host responsibility training and/or refreshers in the last 12 months.
 - Five of the Six employees who have a primary role of cashier supervisor have received advanced host responsibility training. ██████████ is registered for advanced host responsibility training, but the record show he has not started this. ██████████ has completed Host Responsibility 2.
 - All other cashier staff have completed at least Host Responsibility 2.
- Links to the online modules for responsible gambling and advanced host responsibility was provided by SkyCity Queenstown (Appendix X). A review of these training materials found that they contained information that would allow staff to meet the requirements outlined in Section 12(2) of the Gambling (Harm Prevention and minimisation) Regulations 2004.
- Both cashiers interviewed (Appendix I and J) were able to name the five red flag indicators as well as a number of other general signs which indicate a patron had a gambling problem. Both cashiers advised they would pass on these observations to a manager. Both were also aware of the different types of exclusions and could explain these. Both were able to describe a process implemented at the casino to pass out a helping hand card to a customer who had four Eftpos transactions or three declined transactions. Both also advised that they spoke with the customers regularly to obtain information with ██████████ being particularly descriptive of this.
- ██████████ advised that the handing out the helping hand card after four Eftpos transactions was unique to Queenstown (Appendix B). ██████████ advised (Appendix H) that his surveillance and security staff do the same for any patron that used the ATM on site four times as the ATM is across from the security desk.
- A review was undertaken of the surveillance daily logs (Appendix G) for the audit period to identify incidents where a cashier had identified a problem gambling sign. Seven of these were identified. Two related to four Eftpos transactions, three to multiple declined transactions, one related to comments a patron was making about her gambling and one was for an unknown reason. These are summarised below:
 - Advising Indian male was given H2H card due to 4x EFTPOS transactions at Cage. 21/08/20.
 - Handed a Helping Hand card to an Elderly European female (unknown) who had 4x declined EFTPOS transactions. 7/09/20.
 - ██████████ advised that he would be entering an iTrak entry for a patron who had four declined Eftpos transactions. 14/11/20.
 - Call received from ██████████ (Acting Cashier) advising of updating the iTrak for a Host Responsibility Interaction. 28/11/20.
 - Call received advising helping Hand Card was served to a patron ██████████ ██████████ after several failed transactions. 04/12/20.
 - Advising that helping hand was given to patron after 4 Eftpos transaction within an hour. 29/12/20.

- ██████████ advises that he has handed out a Helping Hand card to a Caucasian female wearing a black and white dress and glasses, ██████████ advised that he suspects the patron is a mystery shopper as she often makes comments that things aren't going well for her etc.
- 2250hrs- ██████████ (Security Team Leader) advised of above. ██████████ speaks to ██████████ and then approaches the patron on AC08.2256hrs- ██████████ advises he has spoken to the patron and offered self exclusion, the patron says she is fine and it was just a comment that her gaming is not going that well today. SDS reports identify the patron as ██████████ 20/02/21.
- During the interview with ██████████ he mentioned a recent incident during which he had an interaction with a patron due to a cashier (██████████) advising about a comment that had been overheard from a patron. ██████████ was able to provide the corresponding I-track entry when requested (Appendix Y).
- Queenstown Casino management have implemented a number of measures to help support their staff implementing their host responsibility training. These include reminder posters on the back of the staff toilet doors and regular coaching sessions from ██████████ and ██████████ (Appendix Z).

Conclusion

The cashier staff at SkyCity Queenstown have received adequate training to fulfil their host responsibility functions. Interviews and extracts from i-Trak demonstrate that staff are putting their training into practise and identifying patrons who exhibit possible signs of problem gambling. The management of SkyCity Queenstown have introduced a number of measures to support staff in the host responsibility space.

Cashless Gambling

Minimum Cashless Technical Requirements for
Cashless Gambling Technology (All Sections)

Achieved

Criteria

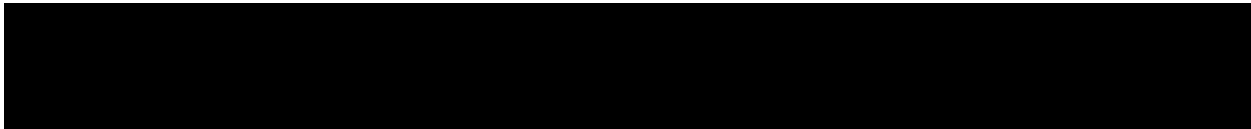
- Review of procedures related to the use of TITO and player loyalty account-base cashless gambling technology.
- Assessment of loyalty card technical requirements.
- Assessment of TITO technical requirements and physical ticket requirements.

Finding

The Department is satisfied that SkyCity Queenstown meets the applicable legislative requirements for cashless gambling.

- ██████████ advised (Appendix B) that at SkyCity Queenstown the EGMs accept both cash and Tito tickets but that the EGMs only pay out in TITO tickets.

- Patrons can use the CRT machine on the floor to redeem TITO tickets up to a value of \$499.99 for cash, Andrew advised that the CRT machine gives out \$20 and \$5 notes (Appendix AA). These are consistent with the limits listed under Section 12.3 of the Minimum Cashless Technical Requirements for Printed Ticket-in Ticket-out and Player Loyalty Account-Based Cashless Gambling Technology. Otherwise customers can take the TITO tickets to the cashiers who will scan the ticket to see if it is valid and then pay it out.
- [REDACTED]
- A review was undertaken of the SkyCity Queenstown Shift Report for November 2020 located in the Queenstown Casino Notification inbox. There were only two instances (There was 78 instances overall where patrons had won over \$2,000 on the EGMS) in the month where a patron won over \$2,000 on the gaming machines and a name was not obtained so it appears the cashier are able to do so in most instances (Appendix CC).
- TITO tickets from other SkyCity Casino sites can also be redeemed at SkyCity Queenstown and there is a SOP procedure for this (Appendix DD). The other SkyCity site is contacted to confirm that the ticket is still valid before it is paid out.



- The two cashiers interviewed (Appendix I and J) described the same process documented in the SOP's.
- A TITO ticket was provided (Appendix EE) to the audit team while onsite. This ticket was checked against the requirements listed in section 8.1 of Minimum Cashless Technical Requirements for Printed Ticket-in Ticket-out and Player Loyalty Account-Based Cashless Gambling Technology and contained all of the information required under this section.
- Jonathan Browne advised (Appendix FF) that SkyCity Queenstown did not have any loyalty account based cashless gambling.

Conclusion

SkyCity Queenstown have processes in place that meet the Minimum requirements for cashless gambling in relation to the use of TITO tickets. Loyalty account based cashless gambling is not conducted at SkyCity Queenstown.

9. Required actions and recommendations

No required actions were identified during the audit.

Area	Recommendation
Transfer of Money	
Transfer of Money	
Cash Handling and Management procedure	The Recording and Viewing Cashier Variances Cashier Procedure document be updated to include wording that any variance considered suspicious be reported to DIA as soon as practicable to capture the requirements of Section 62 of the MOS.

10. Appendices

Appendix	Title/Document number
A	SkyCity Casino Audit Meeting Minutes 22/02/22
B	██████████ Interview 6/04/22
C	Deposit Account Transfers
D	Deposit Accounts
E	Table Drop Collection
F	NAD drop
G	DIA Audit of SkyCity Casino Cashiering process
H	██████████ Interview 6/04/22
I	██████████ Interview 6/04/22
J	██████████ interview 6/04/22
K	Money Exchange Machine
L	Banking to and from ACM
M	Three month checklist of documentation for excess funds being sent to offsite bank
N	040422 Daily Logs-QTN and 040422 Proactives-QTN
O	Checklist for transactions to main bank June 2021
P	Posting variances, Recording Cashier Variances
Q	11.05-Cashier Variances
R	Variance Check Sheet FY21
S	Cashier-1K Variance 10 Sept 21, Cashier \$500 Variance 12 Nov 21
T	11.07- Cashier Activity Monitoring
U	Table Count jobsheet
V	Host Res Programme and PGIP 2019
W	Host Res training spreadsheet, ██████████ training record
X	Cage Staff- Training links
Y	I-track example of cashier picking up on general sign and escalating
Z	Photos taken during audit, HRT Scenarios Cash Desk Intro
AA	Queenstown casino tour jobsheet
BB	Tito Payouts
CC	Review of SkyCity Queenstown Shift Report November 2020
DD	TOTI Tickets Redeem HMN AKL Sites
EE	TITO ticket example front and back
FF	SkyCity Queenstown- Cashiering