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14 April 2022

By email: susan.allen@dia.govt.nz

SkyCity Auckland Casino Final Report – Host Responsibility Programme Audit – January 2019

Dear Susan

1. I refer to your letter of 25 March 2022 to Michael Ahearne requesting a response to the recommendations included in the SkyCity Auckland Casino Final Report issued by the Department in May 2021 (**Report**) relating to its 2019 audit of the SkyCity Auckland Host Responsibility Programme (conducted in January and February 2019).
2. SkyCity takes its host responsibility obligations very seriously and seeks to continuously improve its performance in this area, using a mix of technology and highly trained staff.
3. Since the audit was conducted in 2019, SkyCity has taken on board the Department's feedback and made significant enhancements to its Harm Minimisation Framework (of which the Host Responsibility Programme is a key part) - a number of which have already been acknowledged by the Department in the Report and its letter of 11 May 2021, which noted that the Department was "*encouraged by the changes being made at SkyCity in respect of its host responsibility obligations and anticipates seeing these reflected in future audit results*".
4. As requested, attached, as an Appendix to this letter, is a table setting out SkyCity's responses to the recommendations included in the Report. Many of the host responsibility initiatives referred to in the Appendix were demonstrated to you and Caroline BridglandHill during your visit to the SkyCity Auckland casino on 5 April 2022.
5. We note that the various harm minimisation initiatives outlined in the table do not reflect an end point, but reflect continuous enhancements in the performance of our host responsibility obligations as new technologies emerge and our Harm Minimisation Framework matures. In particular, the attached responses reflect SkyCity's ongoing focus and efforts to detect uncarded continuous play using a mix of technology and staff. As discussed, uncarded play remains a challenge for the industry globally and SkyCity is committed to continuing its efforts in this area. In this regard, we have taken two specific actions in the last month to address the challenge of uncarded play:

- (a) in March 2022, we began a process to create and recruit for new “Responsible Gaming Host” roles at SkyCity Auckland. This new team of Responsible Gaming Hosts will work collaboratively with available technology and proactively monitor the main casino floor for uncarded continuous play; and
 - (b) we have been investigating the use of facial recognition technology to identify uncarded continuous play and will commence a trial of this technology at the SkyCity Hamilton casino later this month. If the trial proves successful, we intend to implement this technology at the SkyCity Hamilton casino and at the SkyCity Auckland casino.
6. Please let me know whether you require further information and/or evidence relating to any particular response in the Appendix. We would also be happy to provide a more detailed demonstration or presentation of any of the host responsibility initiatives demonstrated to you and Caroline BridglandHill on 5 April 2022.
7. SkyCity remains committed to the delivery of a high quality and compliant Host Responsibility Programme as a part of its Harm Minimisation Framework and to working constructively with the Department in this regard.

Yours sincerely



James Chapman
General Manager Legal & Regulatory Affairs
SkyCity Entertainment Group

APPENDIX

Identification of Problem Gamblers (2.0)

Recommendation	SkyCity Response
<p>1 Implement a robust system to analyse data to ensure consistent identification of problem gamblers</p>	<p>SkyCity has used the Focal analytical model (Focal Model) to analyse the data collected from carded play at the SkyCity Auckland casino since 2014. The Focal Model uses this customer loyalty data to build multi-level algorithms to assist Host Responsibility Executives to identify potential problem gambling.</p> <p>SkyCity has worked collaboratively with the Focal Model’s Canadian provider, Focal Research, to continuously enhance and improve the Focal Model at the SkyCity Auckland casino. The Focal Model was:</p> <ul style="list-style-type: none"> • initially upgraded in May 2019 to enhance and improve SkyCity’s ability to identify potential at-risk gamblers with the enhancements becoming operational in September 2019; and • further upgraded in June 2020 with the addition of Focal Research’s ‘ALeRT BETTOR Protection System’. The ALeRT BETTOR Protection System software uses routinely stored customer data to create complex models for identifying and managing high-risk play that otherwise might not be outwardly visible to operators or customers. <p>Facial recognition technology was implemented at the SkyCity Auckland casino in November 2019 and the Live Floor View (LFV) system was introduced at the SkyCity Auckland casino in March 2020. Both of these systems assist with the identification of problem gamblers and provide data to SkyCity. Facial recognition</p>

		<p>technology assists SkyCity in identifying customers who have an active exclusion with the aim of preventing these customers from accessing the gaming areas. LFV's primary purpose is to assist in the detection of uncarded continuous play.</p> <p>In March 2021, a new role was created within the Host Responsibility team - the Host Responsibility Business Improvement Lead. The purpose of this role is to constantly and proactively review SkyCity's ICT systems, analyse data and provide insights.</p> <p>In April 2021, facial recognition long stay (FRLS) technology was implemented at the SkyCity Auckland casino. FRLS technology assists SkyCity in identifying customers who remain within the casino for extended periods.</p> <p>In February 2022, SkyCity undertook an upgrade of its iTrak customer relationship management (CRM) system. The updated version of iTrak has simplified data entry and improved reporting functionality.</p> <p>SkyCity has also agreed to be part of a trial by Focal Research, testing a new product that monitors players' behaviour (both carded and uncarded players) in real time. Following a set up period, we expect the trial to begin in October 2022.</p> <p>The data collected through SkyCity's range of systems is:</p> <ul style="list-style-type: none">• used by the Host Responsibility team to identify problem gamblers;• used to inform SkyCity's rolling 12-month host responsibility road map of host responsibility activities and initiatives;
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		<ul style="list-style-type: none"> presented to SkyCity's Host Responsibility Senior Management Governance Group; and presented to problem gambling service providers at bi-monthly liaison meetings to assist in their policy and decision making.
2	Implement policy and processes requiring formal interactions with returning excluded gamblers who breach their safety/re-entry plans	<p>All previously excluded customers who are approved for re-entry into gaming areas are tagged as Gamblers of Interest (GOI). As a GOI, their gaming activity is monitored by the Host Responsibility team for a minimum of six months. All such customers are required to play carded to assist with the monitoring of their play. A formal interaction must take place if this monitoring raises any concerns or if an agreed re-entry plan is breached.</p> <p>Since December 2021, re-entry plans for returning excluded gaming machines customers have been replaced with pre-commitment plans. The Host Responsibility team receives an automated alert if a re-entry customer breaches their pre-commitment plan and an interaction is then held with that customer.</p> <p>If a customer breaches an approved re-entry plan or a pre-commitment plan on three occasions, they are re-excluded by the Host Responsibility team.</p>
3	Use intensity and frequency of play data as indicators of problem gambling	<p>As noted earlier, SkyCity uses the Focal Model as a key harm minimisation tool.</p> <p>The Focal Model used at the SkyCity Auckland casino contains a large number of data points – 124 unique behavioural indicators and over 800 variables – to identify high risk behaviour. Intensity and frequency of play are included in these data points, but are not,</p>

		<p>in isolation, regarded as indicators of problem gambling. As outlined in the SkyCity Auckland Problem Gambler Identification Policy, intensity and frequency of play are 'general indicators', which are warning signs that may, or may not, indicate a problem if observed in isolation but may become indicative of gambling-related harm when a greater number of signs are observed together or across time.</p>
4	<p>Use player ethnicity as risk criteria, particularly for Maori, Pacific and Asian players</p>	<p>As previously advised to the Department, "<i>ethnic or national origins, which includes nationality or citizenship</i>" is one of the prohibited grounds of discrimination in the Human Rights Act 1993. The use of a customer's ethnicity as a risk criterion when analysing player data is likely to contravene the Human Rights Act 1993.</p> <p>Ethnicity data is however collected in relation to exclusions and breaches of exclusions to inform where SkyCity could enhance its harm minimisation focus and initiatives. SkyCity is currently using ethnicity data (on an anonymised basis) to pilot a community outreach strategy for Chinese and Indian communities in Auckland in collaboration with Asian Family Services.</p>
5	<p>Utilise data more effectively to support host responsibility obligations</p>	<p>As noted above, the data from the Focal Model, FRLS and LFV is used by the Host Responsibility team to support SkyCity's host responsibility obligations. Each of these systems has either been enhanced or introduced since the audit was conducted in 2019. The new Host Responsibility Business Improvement Lead has been introduced to further enhance SkyCity's use of this data.</p> <p>Host responsibility data is presented at bi-monthly meetings with gambling service providers and quarterly meetings with Problem</p>

		<p>Gambling Foundation and Salvation Army to assist in their policy and decision making.</p>
6	<p>Provide increased training of staff to improve the quality and consistency of PGI data</p>	<p>SkyCity's host responsibility training (HRT) programme was reviewed at the end of 2020 and an enhanced HRT programme subsequently launched in February 2021.</p> <p>Following the restructure of the Auckland Host Responsibility team in 2021, the HRT programme is now administered and delivered by the SkyCity Learning & Development (L&D) team in partnership with the Host Responsibility team (previously this was administered and delivered by the Host Responsibility team). Prior to the restructure, 1 full time equivalent (FTE) was managing the HRT programme and, following the restructure, there are 3 FTEs managing the HRT programme.</p> <p>The HRT programme is subject to continuous review and enhancement:</p> <ul style="list-style-type: none"> • in August 2021, the Host Responsibility team began delivering scenario-based training to customer facing teams to supplement the formal HRT modules; and • in February 2022, SkyCity's L&D team rolled out an updated HR3 training course. The HR3 course is the highest level of training and is targeted at senior roles that interact with gaming customers. <p>The HRT programme is reinforced by staff lanyards (worn by customer facing staff) which list red flags and problem gambling indicators (PGIs) that staff are required to be alert to.</p>

7	Increase staff levels of CSAs to more effectively cover the floor area	<p>In 2020, there were 20 FTEs dedicated to host responsibility. Immediately following the Auckland Host Responsibility team restructure in 2021, there were 27 FTEs dedicated to host responsibility.</p> <p>As a part of this 2021 restructure, nine FTE Customer Service Ambassador (CSA) roles in Auckland were replaced by four Host Responsibility Executives, two Host Responsibility Administrators and two Business Improvement roles. In addition, a part of each Security Manager's role is now dedicated to host responsibility ensuring SkyCity has adequate host responsibility coverage and the ability to escalate matters during busy periods.</p> <p>In addition to the above positions, in April 2021, following the introduction of the FRLS system, a 'Long Stay Task Force' was introduced in Auckland to action all alerts generated as a result of customers being onsite for extended periods of time (as set out within the SkyCity Auckland Host Responsibility Programme (HRP)). The task force is made up of seven FTEs, who cover the SkyCity Auckland casino gaming areas 24/7 with a sole focus on host responsibility interactions.</p> <p>In March 2022, SkyCity began a process to create and recruit for new Responsible Gaming Host roles. These roles will comprise of a mixture of full time and part time positions to give 24/7 coverage at the SkyCity Auckland casino. Once recruited, these roles will add a further 11.6 FTEs dedicated to host responsibility.</p>
8	Implement structured HRP meetings with relevant team managers and front-line staff to increase understanding of their host responsibility obligations and effectiveness	The new HRT programme, which is compulsory for relevant team managers and front-line staff, provides further information on the HRP with the aim of increasing the understanding those staff

	<p>members' knowledge of the HRP and their host responsibility obligations.</p> <p>Scenario-based training was introduced at SkyCity Auckland in August 2021 to reinforce how to apply the principles of the HRP in a real life setting for front line staff.</p> <p>The Head of Host Responsibility NZ:</p> <ul style="list-style-type: none">• chairs weekly meetings with Host Responsibility Managers to discuss any matters relating to host responsibility and harm minimisation;• sits on the Auckland Leadership Team (ALT) and host responsibility is a standing agenda item at the ALT's fortnightly meetings; and• regularly meets with managers across the organisation and presents host responsibility updates to teams. <p>Host responsibility topics such as identifying problem gambling indicators and red flags are discussed by Gaming Machine teams during pre-shift meetings.</p>
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Exclusion (3.1.1) and Long Hours of Play (3.1.6)

	Recommendation	SkyCity Response
9	Improve processes and systems to identify excluded gamblers	<p>Facial recognition technology for banned patrons was introduced at the SkyCity Auckland casino in November 2019, reducing reliance on human memory which was the primary mechanism for identifying excluded persons returning to the casino in breach of their exclusion orders. This led to a marked increase in the number of exclusion-related breaches detected.</p> <p>SkyCity does not however rely solely on this technology to detect excluded players. Photographs of selected banned patrons are still shown to staff and displayed in the Surveillance and Gaming departments, and staff are required to be alert to banned patrons in the gaming areas.</p>
10	Review and implement improved processes and systems for monitoring un-carded players to ensure they are effective and fit-for-purpose	<p>There is currently no technology available that specifically tracks uncarded play. In the absence of a specific solution, SkyCity introduced LFV in March 2020 to assist staff in the monitoring of uncarded continuous play.</p> <p>In April 2022, SkyCity will trial using facial recognition technology to identify uncarded continuous play at the SkyCity Hamilton casino. If the trial is successful, this new system will be implemented at the SkyCity Hamilton casino and the SkyCity Auckland casino.</p> <p>As noted above, in March 2022, SkyCity began a process to create and recruit for a new team of 'Responsible Gambling Hosts'. This new team will work collaboratively with available technology and proactively monitor the main casino floor for uncarded continuous play. This team will operate in addition to the Long Stay Task</p>

		<p>Force that focusses on host responsibility interactions (as detailed in the response to Recommendation 7 above) and does not detract from the responsibility all front-line staff have regarding the monitoring of continuous play.</p>
11	<p>Facial recognition software data is analysed and used to improve identification of problem gamblers</p>	<p>Stage 1 of facial recognition technology was introduced at the SkyCity Auckland casino in November 2019. This system identifies excluded customers and helps ensure those customers are unable to play at SkyCity.</p> <p>Stage 2 of facial recognition technology was introduced at the SkyCity Auckland casino in April 2021 following a successful pilot at the SkyCity Hamilton casino. This second stage uses the same facial recognition system and cameras to monitor the length of time customers spend onsite. In conjunction with staff observations, Stage 2 of facial recognition technology helps SkyCity to meet its continuous presence obligations within the HRP.</p> <p>The Host Responsibility Business Improvement Lead analyses data obtained from the facial recognition system and provides information for the Head of Host Responsibility NZ to present at the internal SkyCity Host Responsibility Senior Management Group meetings as well as the external liaison meetings with service providers.</p> <p>Currently, the Head of Host Responsibility NZ is working with Asian Family Services on a community engagement pilot with the Chinese and Indian communities in Auckland. This pilot was prompted by data obtained through SkyCity's systems, including the facial recognition system.</p>

12	Ensure that existing systems such as the scrolling screen in the security room are functioning	<p>This matter was remedied immediately following the Department's visit during the 2019 audit when this feature was observed not to be functioning correctly.</p> <p>Since the introduction of facial recognition technology in 2019, the scrolling screen is no longer the primary method for detecting excluded customers who breach their exclusions, but it is still used as a reminder to staff to be vigilant.</p>
13	Consider increasing staffing levels, especially in the CSA role to provide better coverage for identifying PGIs of un-carded players	See the response to Recommendation 7 above.
14	Consider more effective use of security and surveillance teams to help proactively monitor un-carded players	<p>SkyCity introduced LFV in March 2020 to assist staff in the monitoring of uncarded continuous play. Alerts generated by the LFV system are sent to the Surveillance team for review.</p> <p>Stage 2 of facial recognition technology was introduced at the SkyCity Auckland casino in April 2021 to monitor continuous presence of both carded and uncarded players.</p> <p>SkyCity is currently investigating the possibility of adapting facial recognition technology further to monitor uncarded continuous play. SkyCity will run a trial of this new technology at the SkyCity Hamilton casino in April 2022. If the trial is successful, this new technology will be implemented at the SkyCity Hamilton casino and SkyCity Auckland casino.</p> <p>25% of a Security Manager's role and responsibilities are allocated to host responsibility matters.</p> <p>Traditionally, the Surveillance team's core role was to ensure game integrity, but the Surveillance team's role and responsibilities have</p>

		expanded significantly over the last three years to include a greater amount of compliance related work, namely host responsibility and anti-money laundering support and identification.
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Underage Persons (3.1.3)

Recommendation		SkyCity Response
15	Review entry controls in respect of staffing, training or entrance layout and remedy accordingly	<p>The new HRT programme includes training on identifying and managing underage persons.</p> <p>Additional signage has been placed throughout the casino property advising of the minimum age to enter the casino area.</p>
16	Ensure signs stating the age restriction of the casino are visible at the entrance and gaming areas	<p>As above, additional signage has been placed throughout the casino property advising of the minimum age to enter the casino area, including large rolling LCD screens at the main casino entry points with the minimum entry age prominently displayed and (to assist staff when sighting customer identification, particularly during busy periods) the date that a person is required to be born before to be of the minimum age.</p> <p>R20 signage is a common feature throughout the gaming areas.</p>

Gambling Limitation (3.1.7)

	Recommendation	SkyCity Response
17	Encourage and proactively promote the voluntary pre-commitment system	<p>'Sit this one out', introduced in late 2021, is the umbrella brand that underpins SkyCity's customer focused messaging around matters such as pre-commitment, which is promoted via screens in the gaming areas.</p> <p>Pamphlets promoting pre-commitment are readily available in the gaming areas and information on pre-commitment is available on the SkyCity Auckland website.</p> <p>In December 2021, re-entry plans for returning excluded customers who use gaming machines were replaced with mandatory pre-commitment plans.</p> <p>SkyCity is currently working alongside Asian Family Services on a pilot project to proactively engage with the Indian and Chinese communities in Auckland. The objective of the pilot is to educate these communities on how SkyCity can help them prevent gambling harm within their communities, including the promotion of pre-commitment plans and the ability for third parties to request that an individual be excluded.</p>
18	SkyCity management issue comms to staff to remind them of the importance of pre-commitment and for it to be treated seriously	Information on pre-commitment is included in the revised HRT programme, which we believe to be the most effective way to communicate this message to all relevant staff.

Loyalty Data Analytics (3.1.8)

Recommendation		SkyCity Response
19	Effectively use loyalty data to identify potential problem gamblers	See the responses to Recommendations 1 and 5 above.
20	Improve the range and quality of data collected to enable the Focal Model to be more effective	See the response to Recommendation 1 above.

Responsible Marketing (3.7)

Recommendation		SkyCity Response
21	Assess spend and visitation data when running promotions to determine whether there are indicators of additional gambling harm	<p>The Focal Model algorithm provides detailed insights into player behaviour on an ongoing basis, including during times when promotions are run. The Focal Model data is reviewed monthly for signs of high-risk behaviour and where necessary an interaction is held.</p> <p>Where a promotion relies on patron spend to earn entries to a draw or to qualify for a reward, the level of spend is set at a level that is realistic for the targeted patron tier (both in terms of required turnover and time allowed to achieve the required turnover).</p> <p>In addition to the Host Responsibility team, all promotions are reviewed and approved by the SkyCity Legal team (who are responsible for the final sign-off of promotions). The purpose of promotion reviews is to ensure harm minimisation issues are considered and addressed. The potential for a promotion to cause</p>

		gambling harm may be addressed as a part of the legal review of a promotion (in addition to the Host Responsibility team's assessment).
22	Initiate post-promotion assessments that consider that assess the impacts of the promotion in relation to gambling harm	<p>Post-promotion assessments are in place and managed by the Head of Host Responsibility NZ.</p> <p>The identification of harm resulting from promotional activity became a standing item in post-promotion reviews in 2021.</p> <p>The Head of Host Responsibility NZ holds monthly meetings with SkyCity Auckland's Marketing Manager to discuss past and future promotions.</p>
23	Ensure information and reminders are included about host responsibility and signs of gambling harm when briefing staff on promotions	From April 2022, staff briefs for gaming promotions will contain a host responsibility message about signs of gambling harm.

Learning and Development (3.9)

Recommendation	SkyCity Response
<p>24 Review the workloads and priorities of staff and staff levels to ensure that there is opportunity to utilise their training</p>	<p>Following the restructure of the Auckland Host Responsibility team in 2021, the number of staff working on host responsibility increased from 20 to 27.</p> <p>Part of this restructure included increasing the number of Host Responsibility Executives from eight to 12 and appointing two Host Responsibility Administrators. These two changes have allowed the Host Responsibility Executives to spend more time in the gaming areas monitoring and interacting with customers.</p>
<p>25 Training of staff to improve the quality and consistency of PGI data</p>	<p>See the response to Recommendation 6 above.</p>
<p>26 Training of staff to be confident in their roles, especially around approaching gamblers</p>	<p>The new HRT programme launched in February 2021 contains scenario-based examples which have proved to increase staff confidence in approaching gamblers.</p> <p>In August 2021, the Host Responsibility team began providing additional scenario-based training to customer facing staff to supplement the formal HRT programme.</p>
<p>27 Compulsory regular refresher training of HR2 and HR3</p>	<p>Relevant staff are scheduled to re-take the HR2 and HR3 training modules every two years.</p>
<p>28 CSAs receive additional training to improve the identification of potential problem gambling</p>	<p>The CSA roles have since been disestablished and replaced with more experienced Host Responsibility Executive roles - see the response to Recommendation 7 above.</p> <p>As noted above, SkyCity began a process to create and recruit for new Responsible Gambling Hosts in April 2022. These new</p>

		Responsible Gambling Hosts will have increased responsibilities relating to host responsibility compared to the former CSAs and will receive the highest level of host responsibility training (HR3).
29	Consider reviewing the mystery shopper scenarios to ensure they are realistic and challenge staff	<p>The mystery shopper exercises were refreshed in early 2021 to make them more realistic. Examples include providing the mystery shoppers with a small budget for food during their visit and having mystery shoppers visit in pairs.</p> <p>The mystery shopper scenarios are discussed between the Host Responsibility Managers to ensure they are at an appropriate level.</p>

Monitoring and Reporting (4.0)

Recommendation		SkyCity Response
30	Improve self-evaluation practices to ensure that shortcomings and failure to meet obligations in the HRP are identified and remedied accordingly	<p>A full time role has been established since February 2021 in the SkyCity Group Risk team, providing continuous assurance over HRP compliance for all SkyCity sites. A rotational assurance plan is followed, with regular reporting back to the Host Responsibility Senior Management Group, to drive improvement, and reports are provided to the SkyCity Board's Sustainability Committee.</p> <p>The Sustainability Committee is a dedicated Board committee that assists the SkyCity Board to contribute to SkyCity's vision and strategic plan by ensuring that the company's sustainability strategy is best practice and supports the highest level of sustainability objectives, with priority given to minimising the impacts associated with problem gambling as an area of primary focus. The Sustainability Committee is responsible for overseeing</p>

		<p>and monitoring the company's host responsibility and responsible gambling programme and initiatives and monitoring licensing and regulatory compliance in respect of such matters. At each scheduled Sustainability Committee meeting, progress against host responsibility and responsible gambling measures and targets is reported and discussed as a standing agenda item.</p> <p>Internal assurance is supplemented by two-yearly external independent reviews of compliance with the HRP for all SkyCity sites. Findings are reported to the Host Responsibility Senior Management Group and the Board Sustainability Committee.</p> <p>EY will shortly begin its 2022 external independent review, a few months ahead of schedule.</p> <p>All assurance issues raised (internally and externally) are tracked by the Group Risk team through to completion and assessed for efficacy before being closed.</p>
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General

	Recommendation	SkyCity Response
31	Leadership and culture – as noted, there is an observed dismissive attitude toward host responsibility and gambling harm at SkyCity Casino. If any effective changes are to be made there needs to be a shift in SkyCity's attitude	<p>The new role of Head of Host Responsibility NZ was appointed in November 2020 to provide additional leadership to SkyCity's host responsibility framework. In addition, a new Auckland Host Responsibility Manager started in November 2020.</p> <p>Since 2019, senior management (including the Chief Executive Officer) has participated in the Host Responsibility Senior Management Group, and the Group's meetings are more</p>

		<p>structured with increased reporting on host responsibility metrics and analytics. The Group meets regularly to deal with issues as they arise and to drive continuous improvement.</p> <p>Through the SkyCity Board, the Board’s Sustainability Committee (for which minimising the impacts associated with problem gambling is an area of primary focus) and Management groups, host responsibility remains a key priority for the business.</p> <p>The 2021 staff engagement survey showed that 90% of staff believed that SkyCity is a responsible host, up 2% from 2019.</p> <p>In late 2021, a new host responsibility brand (‘Sit this one out’) was launched to promote host responsibility internally and externally.</p> <p>SkyCity arranged to provide space for problem gambling service providers on the SkyCity Auckland main casino floor during the 2021 Gambling Harm Awareness Week, and again during a second period at the beginning of December 2021. Unfortunately, these arrangements were disrupted by COVID-19 restrictions. SkyCity’s intention is to provide two further attendance opportunities during 2022.</p> <p>SkyCity gathers external feedback on its host responsibility model through bi-monthly meetings with problem gambling service providers and quarterly meetings with Problem Gambling Foundation and Salvation Army Oasis.</p>
32	<p>Messaging needs to be provided to SkyCity staff to re-emphasise the importance of Host Responsibility. Setting the tone from the top sends an important message to staff around how seriously SkyCity take gambling harm</p>	<p>CEO communications to all staff regularly reinforce the importance of host responsibility to SkyCity.</p>

		<p>The Head of Host Responsibility NZ regularly presents at departmental team days and sits on the Auckland Leadership Team with host responsibility being a standing agenda item at the Auckland Leadership Team's fortnightly meetings.</p> <p>Interaction between the Host Responsibility team and business units has become a regular business activity</p> <p>The Host Responsibility Senior Management Group meets monthly.</p> <p>The importance of host responsibility is clearly articulated in the 'Welcome to SkyCity' induction module that all new staff attend and is reinforced through regular training and communication.</p>
33	<p>There has been an observed dismissive attitude toward aspects of host responsibility by some SkyCity staff. Management need to be vigilant in identifying and addressing these behaviours/misunderstandings as the need arises</p>	<p>See the responses to Recommendations 31 and 32 above.</p>