



25 March 2022

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Kira ora Michael

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

SkyCity Auckland Casino is required under its operator license to ensure that it operates in compliance with its Gambling Commission approved Host Responsibility Programme (HRP).

An audit was conducted of the HRP at SkyCity Auckland in January 2019. The audit focused on SkyCity's implementation of its HRP, with a detailed review of areas of practice considered to be greatest risk based on previous audit findings and notified incidents at the Casino.

The final audit report was issued in May 2021. We note that SkyCity responded again on 27th May 2021, noting that a number of initiatives have been implemented since the 2019 audit as part of SkyCity's ongoing efforts to continuously enhance host responsibility practices and that work remains ongoing. However, it did not respond specifically to the required actions detailed in the final report.

We are now seeking specific responses to the actions required as detailed in the 2019 audit report. These are summarised in the table at the end of this letter.

By no later than close of business **Friday 22nd April 2022**, can you please provide me with a report that details your corrective actions, and evidence that demonstrates these are in practise.

Nga mihi nui

Susan Allen
Deputy Director Operations
Gambling Group



HRP section	Required action
Identification of problem gamblers (2.0)	<ol style="list-style-type: none">1. Implement a robust system to analyse data to ensure consistent identification of problem gamblers2. Implement policy and processes requiring formal interactions with returning excluded gamblers who breach their safety/re-entry plans3. Use intensity and frequency of play data as indicators of problem gambling.4. Use player ethnicity as risk criteria, particularly for Maori, Pacific and Asian players5. Utilise data more effectively to support host responsibility obligations6. Provide increased training of staff to improve the quality and consistency of PGI data7. Increase staff levels of CSAs to more effectively cover the floor area8. Implement structured HRP meetings with relevant team managers and front-line staff to increase understanding of their host responsibility obligations and effectiveness
Exclusion (3.1.1) and Long Hours of Play (3.1.6)	<ol style="list-style-type: none">9. Improve processes and systems to identify excluded gamblers10. Review and implement improved processes and systems for monitoring un-carded players to ensure they are effective and fit-for-purpose11. Facial recognition software data is analysed and used to improve identification of problem gamblers12. Ensure that existing systems such as the scrolling screen in the security room are functioning13. Consider increasing staffing levels, especially in the CSA role to provide better coverage for identifying PGIs of un-carded players14. Consider more effective use of security and surveillance teams to help proactively monitor un-carded players
Underage persons (3.1.3)	<ol style="list-style-type: none">15. Review entry controls in respect of staffing, training or entrance layout and remedy accordingly16. Ensure signs stating the age restriction of the casino are visible at the entrance and gaming areas
Gambling limitation (3.1.7)	<ol style="list-style-type: none">17. Encourage and proactively promote the voluntary pre-commitment system18. SkyCity management issue comms to staff to remind them of the importance of pre-commitment and for it to be treated seriously



HRP section	Required action
Loyalty data analytics (3.1.8)	<ul style="list-style-type: none">19. Assess spend and visitation data when running promotions to determine whether there are indicators of additional gambling harm20. Initiate post-promotion assessments that consider that assess the impacts of the promotion in relation to gambling harm21. Ensure information and reminders are included about host responsibility and signs of gambling harm when briefing staff on promotions
Learning and Development (3.9)	<ul style="list-style-type: none">22. Review the workloads and priorities of staff and staff levels to ensure that there is opportunity to utilise their training23. Training of staff to improve the quality and consistency of PGI data24. Training of staff to be confident in their roles, especially around approaching gamblers25. Compulsory regular refresher training of HR2 and HR326. CSAs receive additional training to improve the identification of potential problem gambling27. Consider reviewing the mystery shopper scenarios to ensure they are realistic and challenge staff
Monitoring and Reporting (4.0)	<ul style="list-style-type: none">28. Improve self-evaluation practices to ensure that shortcomings and failure to meet obligations in the HRP are identified and remedied accordingly
General	<ul style="list-style-type: none">29. 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 attitude30. 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 harm31. 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