

SKYCITY Hamilton

**Host Responsibility
Programme**

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1.0 Introduction

Approval

Effective date: 8 September 2016

Manager:

Peter Treacy
Group General Manager, Corporate Affairs

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1.1 Statement of position

Statement of position

SKYCITY is committed to providing a fun and safe environment for all customers and staff.

SKYCITY recognises that alcohol and gambling can be associated with harm for some of its customers. SKYCITY takes its role as a responsible host seriously and recognises that it has an important role to play in preventing and minimising alcohol and gambling-related harm for its customers and staff.

SKYCITY Hamilton intends this Programme to be a usable document for all staff which clearly sets out its obligations with respect to harm minimisation and prevention.

Compliance with legal obligations

The Programme has been developed by SKYCITY and addresses the host responsibility conditions in the Casino Operator's Licence held by SKYCITY Casino Management Limited that relate to the Hamilton property.

Standard Operating Procedures (SOPs) developed by SKYCITY shall be consistent with and impose no lesser obligations than provided in the Gambling Act 2003 (Act), regulations, licence conditions or this Programme.

SKYCITY Code of Business Practice

The Programme contributes to SKYCITY Hamilton's compliance with the SKYCITY Code of Business Practice.

1.2 Programme objectives

Objectives

The principal objectives of the SKYCITY Hamilton Host Responsibility Programme include:

- Preventing the onset of gambling and/or alcohol related harm and minimising gambling-related harm for customers and other persons potentially affected by their gambling behaviour; and
- Facilitating responsible gambling.

SKYCITY Hamilton aims to fulfil these objectives by:

- Providing effective staff training;
- Providing a safe gambling environment;
- Providing responsible marketing and promotional initiatives;
- Promoting the responsible consumption of alcohol; and
- Engaging effectively with stakeholders.

Outcomes

SKYCITY intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol-related harm to those customers who may be at risk. Reporting requirements relating to achievement of Programme objectives are set out in section 3.

2.0 Harm minimisation and prevention components

Introduction

SKYCITY will focus on addressing underlying causes of gambling and alcohol-related harm as well as taking steps to minimise harm. Harm prevention and minimisation initiatives will be undertaken in the following areas:

- Policies and procedures;
- Host responsibility information for customers;
- Employee gambling-related harm;
- Stakeholder engagement;
- Environmental design;
- Provision of safe gambling environments;
- Marketing practices;
- Display of signage and provision of gaming information to customers;
- Learning and development;
- Identification of problem gamblers; and
- Gambling limitation.

The Programme's requirements for each area are outlined below.

Roles and responsibilities

The Host Responsibility function at SKYCITY Hamilton is managed by the Security, Surveillance & Host Responsibility Manager. This role is responsible for the ongoing monitoring and management of GOI (Gambler of Interest) files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff. Recording, collating and analysing all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers is managed by the Security, Surveillance & Host Responsibility Manager.

References in SKYCITY Hamilton's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility", "Host Responsibility staff" and "the Host Responsibility team" denote the function managed by the Security, Surveillance & Host Responsibility Manager.

2.1 Policies and procedures

Policies and procedures

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of the SKYCITY Hamilton Host Responsibility Programme. The policies and procedures are consistent with the Act, regulations, licence conditions and this Programme, and will be updated to reflect changes.

Policies:

- Problem Gambler Identification Policy

Standard operating procedures:

The following SOPs relate to harm prevention and minimisation activities. An overview of how these procedures are put into practice is shown below.

- Exclusion;
- Unattended Children;
- Underage Persons;
- Responsible Service of Alcohol; and
- Undesirable Behaviour

The following SOPs relate to the Problem Gambler Identification Policy:

- Information Collection and Collation; and
- Analysis and Intervention.

2.1.1 Exclusion

Introduction

SKYCITY offers two types of exclusions:

- Self Exclusion; and
- SKYCITY Exclusion.

SKYCITY Hamilton provides the facility for Self Exclusion of customers from the gaming areas of all SKYCITY sites for periods of three months, six months, nine months, one year, or two years and until they meet re-entry conditions. A customer may request and undertake Self Exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler or where the customer chooses to prevent or limit opportunities for harm to occur. The Self Exclusion process may also be initiated by problem gambling treatment providers or other venues where there are multi-venue exclusion arrangements in place.

SKYCITY Exclusion is for a period of two years and the customer must also meet re-entry conditions.

SKYCITY Exclusion is undertaken where a problem gambler does not take up Self Exclusion, and SKYCITY determines that the customer or his or her family or wider community is or may be experiencing harm as a consequence of that person's gambling behaviour. SKYCITY imposes exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally made on the basis of assessment(s), provision of information, advice and assistance, monitoring of a GOI file, and refusal of a Self Exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. SKYCITY may also impose exclusion after a serious one-off incident where an offer of Self Exclusion has been refused.

Conditions for re-entry are contained in the Exclusion SOP.

Approaches to customers

Only appropriately trained staff may undertake exclusions with customers. This is generally Host Responsibility, Security or Gaming Shift Managers.

Features of the exclusion process

To ensure the effectiveness of the exclusion process, the following are features of the process:

Communication

- Provides a translation service where necessary;
- Provides support to excluded customers through provision of materials from problem gambling counselling service providers and contact details; and
- For Self Exclusion, provides Questions and Answers in appropriate languages.

Third parties and service providers

- Emphasises culturally appropriate processes and, wherever possible and appropriate, encourages families and/or friends to accompany the customer;
- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the excluded customer and during any discussion relating to re-exclusion or re-entry;
- Encourages the excluded customer to nominate a counselling service;
- Arranges for the counselling service to call the excluded customer, if the excluded customer agrees; and
- Encourages the excluded customer to make contact with the counselling service as soon as possible after their exclusion.

Other measures

- Provides an updated database that is accessible to Security and Gaming staff to ensure detection of customers breaching an exclusion order;
- Promotes ongoing dialogue with counselling service providers to continually improve the exclusion process;
- Provides the customer with an opportunity to immediately redeem all redeemable loyalty points for rewards and suspends sending all loyalty information to the customers;
- Requires timely action from staff if a customer approaches requesting Self Exclusion, with every endeavour made to ensure that approaches are responded to while the customer is on the premises or phone; and
- Provides opportunities for off-site Self Exclusion procedures, e.g. Self Exclusion forms are held by problem gambling service providers and can be completed at home.

Breaches

SKYCITY staff are required to be vigilant for any excluded customer who attempts to re-enter gaming areas. SKYCITY Hamilton Security and Gaming staff enforce the exclusion process and take action against those detected committing a breach of the exclusion process. Customers discovered attempting to do so may face a fine and/or prosecution. The Department of Internal Affairs is notified of all breaches by excluded customers.

The SKYCITY Hamilton Host Responsibility team regularly reviews the exclusion process and when necessary, makes improvements, in alignment with Group policy. The reviews may involve seeking customer and staff feedback through informal research processes.

Loyalty card holders

SKYCITY Hamilton must remove from its loyalty programme all excluded and trespassed customers and customers formally requested to leave the premises.

The SKYCITY Hamilton staff member responsible for the administration of the exclusion and trespass records must:

- Advise Host Responsibility within 24 hours of a loyalty programme cardholder being excluded, trespassed or formally requested to leave the premises, to ensure their account is deactivated; and
- Forward any surrendered loyalty card(s) to the loyalty station.

Host Responsibility must:

- Deactivate Excluded cardholders' accounts;
- Deactivate the accounts of cardholders who have been excluded, trespassed or formally requested to leave the premises;
- Send a list of loyalty member customers who have been excluded to the Host Responsibility Department in Auckland.; and
- Deactivate from mailing lists, cardholders who are excluded, trespassed, or formally requested to leave the premises.

Loyalty cards which are deactivated are not required to be returned by the customer to SKYCITY. Should a customer attempt to use his/her deactivated card, an error message will appear, asking the customer to present his/her card to a SKYCITY staff member. Having confirmed that the customer has been excluded, trespassed or formally requested to leave, the SKYCITY staff member will contact Security and appropriate action will be taken in relation to that customer.

2.1.2 Responsible service of alcohol

Background

The SKYCITY Hamilton Responsible Service of Alcohol Programme is designed to ensure that customers enjoy an environment that is safe and enjoyable. A key component is the SKYCITY Hamilton Responsible Service of Alcohol training programme, which is designed for all staff who work in areas where alcohol is served, to promote effective team work to ensure customers' safety and enjoyment.

SKYCITY's Responsible Service of Alcohol Programme will reflect the following principles, which are derived from the Health Promotion Agency's *"Creating a Responsible Drinking Environment - Host Responsibility: Guidelines for Licensed Premises 2014"*. A responsible host:

- Prevents intoxication;
- Does not serve alcohol to minors;
- Provides and actively promotes non-alcoholic alternatives;
- Provides and actively promotes substantial food;
- Serves alcohol responsibly or not at all; and
- Promotes safe transport options.

Approach

The following is the SKYCITY Hamilton programme regarding the responsible service of alcohol:

- SKYCITY Hamilton will provide the sale of alcoholic beverages in a responsible manner, including monitoring and controlling of alcohol consumption;
- SKYCITY Hamilton will ensure that it observes the provisions of the Sale and Supply of Alcohol Act 2012 relating to the permitted hours within which customers can be sold and supplied alcohol and customers and staff are permitted on licensed premises;
- SKYCITY Hamilton will maintain an effective responsible service of alcohol training programme to train and inform relevant employees on the responsible sale and supply of alcohol which must be completed prior to serving alcohol;
- All SKYCITY Hamilton employees, temporary and contract staff will receive training on the Responsible Service of Alcohol during their induction as part of the Host Responsibility Level 1 training programme, including recognition of excessive alcohol consumption traits;
- SKYCITY Hamilton takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises;
- SKYCITY Hamilton takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises;
- Any customer who appears under the age of 25 may be asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, that customer will not be served or supplied with any alcohol;
- Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of staff of similar social/ethnic background to the customers to assist in explaining the programme to customers when required;
- No person who appears intoxicated is served or sold alcohol, allowed to gamble or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another, without referral to a more senior employee;

- At all times, when alcohol is sold or supplied to members of the public, there is a manager or managers on duty who hold current Manager's Certificates under the Sale and Supply of Alcohol Act 2012. ;
- Customers may not bring alcoholic beverages onto the premises where beverage service is provided, unless prior approval has been given;
- SKYCITY Hamilton will ensure that a reasonable range of non-alcoholic drinks is available at reasonable prices;
- SKYCITY will ensure that a reasonable range of low-alcoholic drinks (being less than 2.5% ethanol by volume at 20 degrees Celsius) is available;
- SKYCITY will ensure that a reasonable range of food is available at all times in portions suitable for a single customer, at reasonable prices, and within a reasonable time of being ordered;
- SKYCITY will readily provide free, comprehensive and accurate information to customers about the forms of transport available from the premises; and
- Free water will always be available to customers.

2.1.3 Unattended children

Background

SKYCITY management does not allow children to be left unattended on any part of its premises.

Approach

SKYCITY Hamilton takes active steps to prevent children being without adult supervision.

Employees must report to Security any incident where it is apparent that a child has been left unattended.

Security Officers must intervene and take all practicable steps to locate an adult responsible for an unattended child.

Security must contact the Police and trespass the customer in every case where there is an absence of a reasonable explanation for the child being left unattended.

In all instances of unattended children, the Host Responsibility team must be notified as soon as practicable to follow up potential problem gambling issues.

Security Officers must patrol the SKYCITY Hamilton car parks and environs to detect any unattended children in vehicles.

2.1.4 Underage persons

Background

SKYCITY is committed to keeping minors out of the gambling area. SKYCITY will rigorously enforce the prevention of underage gambling in its casinos.

Approach

SKYCITY Hamilton must take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gambling facilities (currently 20 and over).

Any customer who appears under the age of 25 is asked for verification of identity and proof of age before being permitted to enter the gambling area.

SKYCITY Hamilton must take all reasonable steps to restrict access to 'supervised areas' only to those persons legally permitted by age to enter the area (currently 18 and over), unless accompanied by a parent or guardian.

Training for SKYCITY Hamilton Security and Gaming staff must include the need to be particularly vigilant for the presence of underage persons.

Any SKYCITY Hamilton staff member has the authority to approach suspected underage persons and seek identification for proof of age.

2.1.5 Standards of dress and behaviour

Background

SKYCITY Hamilton must provide a comfortable environment where customers are able to enjoy their surroundings without disruption from others who are inappropriately dressed or behaving in an unacceptable manner.

Dress code

SKYCITY Hamilton requires a neat and tidy standard of dress. While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at SKYCITY Hamilton's casino:

- torn clothes;
- gang patches or other insignias;
- dirty clothes or footwear; or
- hats or caps (unless for religious or medical reasons or for Texas Hold'em Poker).

Behavioural standards

If a customer is detected:

- under the influence of alcohol;
- abusing or threatening staff or other customers;
- causing conflict with other customers or staff, or
- otherwise being unpleasant,

then SKYCITY Hamilton staff must:

- take appropriate steps to stop the behaviour, or
- in appropriate circumstances, have the customer escorted from the premises.

Customers exhibiting undesirable behaviour may be trespassed or excluded.

2.1.6 Gambling limitation

SKYCITY offers customers a voluntary Pre-Commitment system.

This system is available to all casino patrons and allows customers to voluntarily set limits on how much they spend and how long they play for on gaming machines.

Breaches of pre-commitment limits and multiple increases or disabling of pre-commitment limits are new general indicators of problem gambling.

Host responsibility staff will proactively encourage the use of this system, where appropriate, during interactions with patrons.

The features of the voluntary Pre-Commitment system include:

- access to the Pre-Commitment facility via SKYCITY's loyalty card;
- each time the loyalty card is inserted, the Pre-Commitment facility will be activated;
- the system will allow players to define their own limits for:
 - time limit; and
 - spend limit;
- enrolment for pre-commitment can occur at either:
 - the gaming machine by the player; or
 - a loyalty member's workstation;
- an "approaching limits" and "reached limits" notification will be displayed on the gaming machine;
- if limits are relaxed, then the new limits must not be available to the player for a period of 24 hours;
- once the limit is reached, no more SKYCITY loyalty points may be accumulated or entries to promotions earned;
- SKYCITY Host Responsibility Executives will be alerted once limits are breached, increased or disabled;
- no SKYCITY loyalty points can be earned by a player for the 24 hours following a limit being reached; and
- the system will provide information, support and advice to the operational business units.

2.1.7 Long Hours of Play

Continuous Presence

Continuous Presence is where a customer is present at the casino (but not necessarily gaming continuously) for a period of 12 hours or more. The "clock" is reset after a customer has had a break from being present at the casino for six hours or more.

As a general rule :

- When a customer has been observed to be continuously present at the casino (but not necessarily gaming continuously) for 12 hours, the observing staff member will notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- At the very least, in the course of the interaction, the customer should be encouraged to take breaks and Gaming Staff and/or Host Responsibility must thereafter continue to monitor the customer (which may include subsequent interactions with that customer).
- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.
- When a customer has been continuously present at the casino (but not necessarily gaming continuously) for 24 hours and, provided that no action has already been taken under the Act, this Programme or the Policy:
 - non-international VIP customers must be requested to leave the casino for at least 24 hours; and
 - international VIP customers must be assessed by the International Business Management team to determine whether their play should be permitted to continue or not.

If one or more of the strong indicators is observed, Host Responsibility or Gaming Staff must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been present.

All interactions, observations and assessments must be logged in iTrak.

Continuous Play

Continuous Play is where a customer is gaming continuously for five hours or more. The "clock" is reset after a customer has had a break from gaming of at least 30 minutes (in aggregate).

As a general rule:

- When a customer has been observed gaming continuously for five hours without a break of at least 30 minutes (in aggregate), the observing staff member will notify Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- When a customer has been gaming continuously with a loyalty card without a break of at least 30 minutes (in aggregate), an automated system alert must be sent to Gaming Staff and Host Responsibility. All reasonable endeavours must then be made to interact promptly with the customer.
- At the very least, in the course of the interaction, the customer should be encouraged to take breaks and Gaming Staff and/or Host Responsibility must thereafter continue to monitor the customer (which may include subsequent interactions with that customer).

- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.
- When a customer has been gaming continuously with a loyalty card for 10 hours (without an aggregate break of at least 60 minutes) and, provided that no action has already been taken under the Act, this Programme or the Policy:
 - non-international VIP customers must be requested to leave the casino for at least 24 hours; and
 - international VIP customers must be assessed by the International Business Management team to determine whether their play should be permitted to continue or not.

If one or more of the strong indicators is observed, Host Responsibility or Gaming Staff must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been on site.

All interactions, observations and assessments must be logged in iTrak.

Uncarded players

Although ascertaining the length of "continuous presence" and "continuous play" for uncarded players relies upon observation rather than a system record, if SKYCITY staff become aware of uncarded players being "continuously present" or undertaking "continuous play" for the periods set out above, they must report their observation so that those uncarded players are treated as set out above.

2.2 Host responsibility information for customers

Customer information resources

SKYCITY produces a range of host responsibility information resources for customers. Copies of all SKYCITY brochures and other host responsibility information resources are available and displayed where appropriate in SKYCITY Hamilton's gambling areas.

This information is also supplemented and supported by the SKYCITY Hamilton website (www.skycityhamilton.co.nz) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is also available on the SKYCITY Hamilton website.

There is an ongoing process of review and development of resources for customers.

Information resources are translated into a variety of languages consistent with the cultural make-up of SKYCITY Hamilton's customer base.

A summary of SKYCITY Hamilton's host responsibility resources for customers is shown in Appendix A.

2.3 Employee gambling-related harm

Introduction

SKYCITY is committed to developing an internal culture that proactively supports and promotes host responsibility.

Background

SKYCITY undertakes a range of measures concerning the potential for employee gambling-related harm that aim to:

- Prevent and minimise gambling-related harm amongst SKYCITY employees as a result of their own or someone else's gambling;
- Enhance the ability of SKYCITY staff to undertake effective host responsibility; and
- Contribute to the prevention and minimisation of gambling-related harm in the community.

These measures are intended to address the operator licence condition:

'24(f) assistance to casino employees with managing the potential for personal problem gambling.'

Requirements

SKYCITY Hamilton recognises that employee gambling-related harm is a sensitive issue. Accordingly, measures to promote awareness and encourage and support help-seeking will be discreet and interventions with SKYCITY staff kept confidential.

SKYCITY Hamilton will undertake the following to provide assistance to casino employees with managing the potential for personal problem gambling:

Information resources

- Develop supporting resources for staff that will be made available when required using appropriate channels, including:
 - a standardised gambling screen; and
 - self-help resources to assist with early self-identification and intervention;
- Include information about personal problem gambling and underlying risk factors (such as depression and alcoholism) in host responsibility training programmes and in the Workplace Support (employee assistance) programme;
- Promote awareness about self-assessment and self-help resources, and encourage staff to use these resources themselves to assist with early identification and intervention; and
- Promote information about personal problem gambling support services when staff participate in the Employee Assistance Programme, Employee Financial Assistance, and/or where appropriate where a staff member may be seeking assistance.

Policies and procedures

- Prohibit staff from gambling at any SKYCITY owned or operated casino;
- Prohibit access to online gambling sites by staff while on SKYCITY premises, unless such access is required for genuine business reasons; and
- Identify high risk areas for staff and target with increased levels of information.

Recruitment

- Assess all job applicants for evidence of problem gambling (via questions in job application forms);

- Decline applications from those who are identified as problem gamblers either through their screening results, or disclosure of relevant indicators (as set out in the SKYCITY Identification Policy) during the recruitment process and provide appropriate information, advice and assistance; and
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Hamilton Host Responsibility Programme.

Support for staff

- Provide assistance to staff who are experiencing gambling-related harm, including:
 - Identification;
 - Intervention;
 - Referral to confidential support through the Workplace Support Programme and/or a problem gambling treatment provider;
 - Confidentiality; and
 - Wherever possible, SKYCITY Hamilton will involve problem gambling counsellors in staff induction training about the signs of problem gambling among staff and customers.

Engagement

- Work with class 4 organisations to maximise the effectiveness of their Host Responsibility Programmes.

2.4 Stakeholder engagement

Background

SKYCITY Hamilton aims to maintain constructive relationships with members of the local community.

Approach

SKYCITY Hamilton will continue to facilitate opportunities for regular engagement to ensure local stakeholders:

- Understand and are aware of SKYCITY Hamilton's Host Responsibility Programme;
- Are able to continue to raise and discuss operational issues in relation to host responsibility;
- Continue to have opportunities to provide input into SKYCITY Hamilton's Host Responsibility Programme and harm prevention and minimisation initiatives; and
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

SKYCITY Hamilton convenes a bi-annual Host Responsibility Community Liaison Group to discuss host responsibility issues. These issues primarily relate to operational processes, eg referrals and exclusions, etc. There are also opportunities to discuss strategic or broader sector issues.

SKYCITY will invite representatives from:

- Treatment service providers including problem gambling and alcohol and other drugs;
- Public health providers; and
- Government agencies including the Police, Department of Internal Affairs and Alcohol Advisory Council of New Zealand.

In developing and implementing its Programme, and harm prevention and minimisation initiatives, SKYCITY will consider the views expressed by members of the Liaison Group.

SKYCITY will make available to the Liaison Group a copy of the report provided to the Commission under section 3 of this Programme.

SKYCITY also arranges site visits, including presentations, for representatives to become familiar with the SKYCITY Hamilton Host Responsibility Programme. SKYCITY also undertakes off-site visits to stakeholder organisations.

2.5 Environmental design

Approach

SKYCITY's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol.

Considerations

In considering the impact of any proposed changes, the key objectives are to ensure that environmental features:

- Contribute to harm prevention or have a neutral impact on harm;
- Encourage responsible gambling and alcohol consumption choices;
- Do not contribute to the onset of harm or exacerbate risk; and
- Facilitate effective host responsibility, particularly early identification and intervention.

This approach applies to the following SKYCITY areas:

- Floor lay-out, furnishing and design;
- Casino electronic gaming machine and table game location;
- Access to cash;
- Game and equipment features;
- Environments adjacent to the gaming floor, including access to other entertainment options;
- Physical location and presence of Security and Host Responsibility;
- Location of information resources; and
- Access criteria, including dress codes and age restrictions.

Requirements

SKYCITY shall in its environmental design seek to ensure:

- Problem/responsible gambling signage and exit points are clearly visible;
- Patrons are visible to venue staff on the gaming floor;
- Machine alleys with no exit point and in dimly lit corners are avoided;
- Gambling areas are well lit, utilising natural light where appropriate;
- Clocks are visible in the gambling areas; and
- Other non-gambling entertainment options are available.

Other regulatory processes

All applications for construction or design changes to gambling areas must be approved by the Gambling Commission. As part of any such application, SKYCITY assesses any impacts the alterations may have on harm prevention and harm minimisation. The impact of any proposed design change on gambling harm is assessed in determining the suitability of any such proposal prior to making applications to the Commission.

2.6 Safe gambling environment – gaming machine play

Requirements

SKYCITY will take all reasonable and practicable steps to ensure a customer plays no more than one gaming machine at a time.

2.6.1 Safe gambling environment – third party loans for financial gain

Legislation

Under section 15(1) of the Act, SKYCITY is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the former Casino Control Authority (CCA) or the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided by SKYCITY at the Hamilton casino.

Policy

SKYCITY does not permit loan transactions by third parties for financial gain at the casino venue, except as approved by the CCA or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or “loan sharking” as it is known.

Requirements

- SKYCITY will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- SKYCITY will take all reasonable steps to identify and exclude persons at the casino offering loans for financial gain. To assist this process SKYCITY will maintain an Undesirable Behaviour Standard Operating Procedure which shall explain how SKYCITY will identify, investigate and respond to persons at the casino suspected of offering loans for financial gain.
- Where casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, SKYCITY will investigate and act in a timely manner. This process is outlined in the SKYCITY Hamilton Undesirable Behaviour Standard Operating Procedure.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, SKYCITY will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, SKYCITY may issue that customer with a requirement to leave the premises, pending further investigation. At the completion of its investigation, and where a person is found to be offering loans for financial gain, SKYCITY will issue that person with a trespass notice.
- SKYCITY will notify Department of Internal Affairs Gambling Inspectors of suspected loan sharking activity in accordance with Minimum Operating Standards (MOS) for Records and Notification. Where appropriate, SKYCITY will also notify relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e. not the casino), SKYCITY will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.

- Depending on the outcome of the GOI investigation, the customer may be issued with a SKYCITY Exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm.
- SKYCITY will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

2.6.2 Safe gambling environment – cheque retention

Policy

SKYCITY will when accepting cheques which it will hold unbanked by arrangement with a customer report this to Host Responsibility.

Requirements

Host Responsibility staff will monitor and record the activities of any customer whose cheque it is holding unbanked by arrangement for indicators of potential gambling harm.

2.7 Responsible marketing

Legislation and industry codes

SKYCITY's marketing activities comply with applicable laws, Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004, relevant industry codes (including the New Zealand Advertising Standards Authority "Code for Advertising Gaming and Gambling") and licence conditions.

Requirements

SKYCITY Hamilton will not pursue marketing initiatives which have any of the characteristics set out below. Where concerns are raised by third parties, SKYCITY will investigate and, where appropriate, take immediate action to withdraw or amend the marketing initiative.

SKYCITY Hamilton will ensure an internal process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of SKYCITY's loyalty programme.

This process includes consultation with Host Responsibility as well as the Regulatory team, with final sign-off by Legal (both of which are based at SKYCITY Auckland).

Consultation includes consideration of the following principles.

Does the marketing initiative:

- Target groups at increased risk of experiencing gambling harm?
- Target minors, portray minors participating in gambling activities, or advertise gambling on radio/television at times when minors are more likely to be exposed?
- Encourage or reinforce gambling behaviour(s) that may be associated with harm, including:
 - encourage customers to participate beyond their limits of time or money?
 - discourage customers from taking breaks?
 - promote gambling as a means of relieving financial or personal difficulties?
 - state or imply that gambling is a means of winning or paying for household staples, education or housing commitments?
 - promote excessive alcohol consumption or associate gambling with excessive alcohol consumption?
- Present gambling in an unrealistic, misleading, or deceptive way, including:
 - exaggerating the chances of winning or the size of the prize, including a promise of winning?
 - stating or implying that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game?
 - exploiting superstitions or concepts of luck?

2.8 Display of signage and provision of gaming information to customers

Background

A key component of the Programme is the provision of information for customers. Provision of information is intended to assist customers to make informed decisions about their gambling and alcohol consumption while at SKYCITY.

A description of how SKYCITY will discharge its obligations to offer information and advice to persons identified as problem gamblers is addressed in the Problem Gambler Identification Policy and the SOPs.

Approach

SKYCITY has a range of information resources that are provided to customers, summarised in Appendix A.

Display of signs, brochures, clocks and website

SKYCITY ensures that:

- Host responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of SKYCITY Hamilton's visitors;
- Brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations;
- All gaming machines and gaming tables at SKYCITY display problem Gambling Helpline telephone numbers, with information in a range of languages. The information is also displayed on or near all ATMs and public phones;
- Clocks are on display in all SKYCITY gambling areas; and
- Call Centre facilities include a direct line to the Gambling Helpline.

SKYCITY Hamilton will make available a 'responsible gaming' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are, that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

SKYCITY actively promotes the Gambling Helpline and other free problem gambling counselling service contact details through its host responsibility resources. Customers demonstrating potentially harmful behaviour are encouraged to contact these services. All excluded customers, and third parties who contact SKYCITY about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

SKYCITY Entertainment Group Limited has a host responsibility section on its website.

Display of game rules, permissible bets and payment of winning bets for table games

Information is made available to customers that pertain to game rules, permissible bets and payment of winning bets as required by section 175 of the Act.

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies minimum and maximum bets, and payments of winning bets. Signage is also displayed stating that staff cannot accept tips.

Display of game rules, permissible bets and payment of winning bets for electronic gaming machines

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the "Responsible Gaming" brochure, which is available on the gaming floor.

Customers may request a copy of game rules at any time. If the request is for general information or an overview of a game, an appropriate gaming employee will explain this and can provide a "How to Play" brochure.

Display of game rules, odds of winning and information on problem gambling for Fun Play Tables

Information is made available to customers that pertains to game rules, odds of winning and information on problem gambling.

Whenever a Fun Play table is open, information is displayed which advises customers that the game rules for the game are available upon request, and odds of winning and information on problem gambling.

Display of host responsibility information in open areas where there are gaming machines

Information on problem gambling and responsible gambling are displayed and made available to customers in open areas (e.g. decks) where gaming machines are present.

Information requests by customers

Customers wishing to seek further clarification of game rules will be given access to the relevant approved rules.

Information on gambling activity

Patrons (both loyalty and non-loyalty) can be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

2.9 Learning and development

Introduction

SKYCITY Hamilton is committed to developing staff awareness, understanding and commitment to host responsibility especially with respect to gambling and alcohol-related harm. SKYCITY Hamilton shall comply with its statutory obligations relating to problem gambling awareness training, including as set out in Regulation 12 of the Gambling (Harm Prevention and Minimisation) Regulations 2004.

SKYCITY Hamilton will aim to ensure its learning and development initiatives are appropriate to the needs of its customers and staff.

SKYCITY's learning and development resources approach employs established models of best-practice and include a training mix of classroom based, multi-media and on-the-job coaching. Learning and development resources are tailored depending on the roles and responsibilities of staff, and their required host responsibility customer interactions.

Overview of staff roles

Staff: All staff, regardless of position, are trained to identify indicators of harm. Staff are expected to refer the observation of indicators to a supervisor/manager.

Frontline staff: All staff who have contact with gambling customers in the casino are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Frontline staff have a primary role in being alert to and identifying indicators of harm, and will report observations of concern to a supervisor/manager. While it is not their primary role, frontline staff are trained and will approach customers themselves in circumstances, for example, where a matter is urgent or a manager/supervisor is not available.

Supervisor or manager: The supervisor/manager is the first point of contact for escalation for indicators of harm. Depending on the circumstances, the supervisor/manager delivers interventions by providing information, advice and assistance to customers and taking other appropriate action(s) to minimise harm.

Supervisors and managers are also responsible for ensuring that all observations of indicators reported to them by staff, and follow up responses taken by staff and/or supervisors and managers, are logged and sent to Host Responsibility. Supervisors and managers are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

Host Responsibility: Host Responsibility record, collate and analyse all information relating to indicators of problem gambling noted by frontline staff, supervisors and managers. They also record interactions and interventions they undertake themselves. The information is used to undertake a section 309 assessment. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken by frontline staff, managers or supervisors or by Host Responsibility staff. This may include meeting with customers. Host Responsibility staff are responsible for the ongoing monitoring and management of GOI files, feedback and review of new information on GOI files and the provision of host responsibility advice and support to staff.

Learning and development requirements

Induction training (Level 1)

All permanent staff, whether or not in direct contact with customers, must participate in two hours of face-to-face training within a reasonable timeframe of commencement (approximately one month). This training includes:

- Responsible service of gambling and alcohol;
- Identification of problem gamblers;
- Reporting and recording procedures for observations;
- Approaching and providing information about problem gambling to players; and
- Awareness of employee gambling-related harm.

For all staff in direct contact with customers, SKYCITY will work to supplement this classroom-based training with on-the-job coaching and support.

Level 1 refresher training will occur at least once a year as noted below.

Training for supervisors (Level 2)

Supervisors from Gaming, Food & Beverage, and Security & Surveillance must participate in supplementary Level 2 training. This training is an e-learning module and is to be undertaken within three months of commencement or promotion to a supervisor position. The training includes information on:

- Identification of problem gamblers;
- Overview of the legal framework and Host Responsibility Programme;
- Initial action with respect to customers requesting problem gambling assistance;
- Identification and intervention with respect to excessive alcohol consumption;
- Support of staff who have intervened and debrief; and
- Importance of reporting.

Advanced training (Level 3)

Advanced training, supplementary to induction training, is provided for selected senior employees who may be expected to deliver interventions to customers. This includes managers working in Gaming and Security & Surveillance.

This training includes both theoretical and practical components and can be completed in modules using a range of learning techniques suitable to the SKYCITY Hamilton environment. Topics include:

- SKYCITY's legal and regulatory requirements;
- Identification of problem gamblers;
- Intervention, including brief interventions, de-escalation and motivational interviewing;
- Debriefing and staff support;
- Problem gambling treatment processes;
- Cultural awareness;
- Advanced Responsible Service of Alcohol – intervention and slowing service; and
- Awareness of employee gambling-related harm;

Refresher training

Level 1 refresher training will be delivered annually and be available to all staff. An assessment of areas of focus is to be made beforehand by Host Responsibility staff and managers, and discussed with Host Responsibility training staff. Recall testing will be included in this regular refresher training.

Additional refresher training can be provided when a learning and development need is identified or requested.

General Manager training – Sale and Supply of Alcohol Act 2012

The Licence Controller Qualification, as required by the Sale of Liquor Act, is facilitated through an external provider.

Suicide-awareness Training

Host Responsibility staff and senior Security Managers are trained to respond to customers who are at risk of suicide. This training is facilitated through an external provider.

Informal learning and development

As learning and development is an ongoing process, SKYCITY provides a range of other opportunities for host responsibility learning to occur. There is an emphasis on sharing information and experiences across SKYCITY's portfolio to build host responsibility knowledge. These internal opportunities include:

- Internal communications, e.g. staff newsletters;
- Inclusion in business or management processes, e.g. staff meetings and key performance indicators;
- Discussion forums led by Host Responsibility staff; and
- Participation by staff in the harm minimisation and host responsibility policy development process.

Evaluation

SKYCITY undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement. These measures include:

- Staff training feedback and evaluation forms;
- Staff knowledge recall and application of knowledge;
- Staff focus groups; and
- Analysis of training needs.

2.10 Identification of problem gamblers

A copy of SKYCITY's Problem Gambler Identification Policy is attached as Appendix B and forms part of this Programme. The policy fulfils SKYCITY's obligations under the following sections of the Act.

Section 308 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must have a policy for identifying problem gamblers, which includes:

- an acceptable definition of problem gambling;
- indicators of problem gambling in the casino; and
- the steps to be taken in identifying actual or potential problem gamblers.

This policy must be made available upon request. SKYCITY must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

Section 309 requires that the holder of a casino operator's licence, or person acting on behalf of that person, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) The self-exclusion procedure available; and
- (b) Any procedures described by Regulations made under the Act.

3.0 Monitoring and reporting

Introduction

SKYCITY will evaluate its performance against the objectives of the Programme.

The Hamilton Host Responsibility Programme is measured and monitored using a range of indicators that are set out below. These indicators reflect the level of activity under the Programme, compliance with legal obligations, and progress against all the Programme objectives as set out in section 1.

As the Programme is implemented and embedded into the business, and any initiatives are developed, SKYCITY Hamilton may seek to amend this section of the Programme, prior to the Commission's next two-yearly review.

Reports to the Gambling Commission

SKYCITY will report annually to the Commission on the implementation of the Programme.

Reports will include the following information:

- A description of the resources put into the core elements of the Programme;
- A description of activities undertaken by SKYCITY under the Programme;
- Reporting against the measures specified below, including a comparison to previous data where applicable;
- SKYCITY discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the Department of Internal Affairs and other meetings held as required; and
- Proposed improvements to the Programme.

Gambling Related Measures	Source of data	Frequency
<ul style="list-style-type: none"> Number of customers about whom there have been observations. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of observed indicators reported to Host Responsibility. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of approaches to SKYCITY by third parties. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of problem gamblers identified by the casino. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of GOI files by: <ul style="list-style-type: none"> Ethnicity Gender Age Preferred mode of gambling. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of approaches to customers to offer information about self-exclusion. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of exclusions (both casino and self-exclusions) by: <ul style="list-style-type: none"> Ethnicity Gender Age Preferred mode of gambling (tables/EGMs) Prompted by third party disclosures Exclusion type (self/SKYCITY) Following re-entry. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of customers participating in Multi-site Exclusions. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of excluded customers (both casino and self-exclusions) agreeing to be contacted by help services on exclusion form. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of breaches of exclusion (both casino and self-exclusions) by: <ul style="list-style-type: none"> Ethnicity Gender Age 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of exclusions by length: <ul style="list-style-type: none"> 3 months 6 months 9 months 12 months 24 months 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of successful and unsuccessful applications to re-enter following exclusion. 	SKYCITY	Annual

<ul style="list-style-type: none"> The extent to which customers have been assisted (drawing, <i>inter alia</i>, on feedback from customers and staff). 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of persons trespassed or required to leave for making loans for financial gain. 	SKYCITY	Annual
Measures relating to Responsible Consumption of Alcohol		
<ul style="list-style-type: none"> Number of "Under the Influence" (UTI) incidents (internal report). 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of Police contacts citing SKYCITY as venue where their last drink was served. 	Police Alcolink database	Annual
Measures relating to Staff Training		
<ul style="list-style-type: none"> HR1 courses HR2 courses HR3 courses Refresher training Number of staff who need to be trained in each category, and proportion of those staff who have completed the appropriate level training. 	SKYCITY	Annual
<ul style="list-style-type: none"> Staff recall of knowledge and behaviours related to host responsibility and associated policies and procedures. 	L&D Evaluations Mystery Shopper	Annual Annual
<ul style="list-style-type: none"> Staff perceptions of the effectiveness of training. 	L&D Evaluations	Annual
<ul style="list-style-type: none"> Staff perceptions on the effectiveness of the Employee Gambling Harm Programme, reporting to the Commission to include percentage response rate of staff to the SKYCITY survey. 	SKYCITY commissioned survey	Annual
Other Programme activity and compliance-related measures		
<ul style="list-style-type: none"> Number of internal and external underage incidents. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of unattended children. 	SKYCITY	Annual
<ul style="list-style-type: none"> Number of Requests to Leave the Premises (RTLPS). 	SKYCITY	Annual

Appendix A – Current Host Responsibility Resources for Customers

“Being A Responsible Host: Our Commitment To Our Customers” – poster
SKYCITY developed and displays the A3 “Being a Responsible Host” poster in key gaming areas. The customer-focused poster is designed to provide an overview of SKYCITY’s Host Responsibility Policy and the key initiatives undertaken.

“Would you like a Helping Hand?” – brochure
SKYCITY provides “Would you like a Helping Hand” – brochures in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer. The brochure provides the Gambling Helpline information and signs and symptoms of problem gambling. It also outlines other free problem gambling counselling services.

“Would you like a Helping Hand?” – poster
In supplementing the “Would you like a Helping Hand” – brochure, SKYCITY also produces an A1 poster version. The poster provides the Gambling Helpline number and is displayed in various places across gambling areas including some customer restrooms.

“Would you like a Helping Hand?” – wallet card
This pocket size card also supplements the brochure and presents the Gambling Helpline number and other free problem gambling counselling service contact numbers. Available in Chinese, English, Tongan and Samoan.

“Responsible gaming?” – brochure
This brochure provides responsible gambling tips and an overview of the odds of winning and player returns and highlights that casino games are based on chance and randomness. It also provides Gambling Helpline and SKYCITY Host Responsibility contact details. Available in Chinese and English.

“Self-Exclusion at SKYCITY” – brochure
The brochure outlines the self-identified exclusion process. It provides simple information on frequently asked questions and shows Gambling Helpline and SKYCITY Host Responsibility contact details. The “Self-Exclusion at SKYCITY” brochure is available in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer.

“Concerned About Someone’s Gambling? SKYCITY Can Help” – brochure
The brochure outlines the SKYCITY (third party) exclusion process. It provides simple information on frequently asked questions and shows Gambling Helpline and SKYCITY Host Responsibility contact details. The “Concerned About Someone’s Gambling? SKYCITY Can Help” brochure is available in 12 different languages: Chinese, English, Korean, Maori, Samoan, Tongan, Thai, Hindi, Arabic, Farsi, Japanese and Khmer.

“Why We Can’t Serve You” – tent card
This card provides a summary of the SKYCITY Responsible Service of Alcohol Policy. The tent card is provided to all staff to show to customers when explaining decisions regarding service of alcohol, including the slowing or stopping of service.

“Children at SKYCITY” – brochure
The brochure explains New Zealand law and SKYCITY’s policy with respect to unattended children. It is available in Chinese, English and Hindi.

"SKYCITY Hamilton Dress Code" – brochure

This brochure explains the casino's policy regarding acceptable standards of dress.