

9 May 2012

Alex Harris

Via email: fyi-request-170-373d3a87@requests.fyi.org.nz

Dear Sir

**REQUEST TO GAMBLING COMMISSION**

1. We refer to your email dated 20 April 2012 under the Official Information Act 1982, amended by email dated 4 May. You requested the following:
  - (a) The last host responsibility report filed by SkyCity; and
  - (b) any correspondence, advice, or other documents relating to it.
2. We attach the Report to the Gambling Commission for the 12 months ending 31 December 2011.
3. There was no correspondence, advice, or other documents relating to the above.

Should you have any queries please do not hesitate to contact us.

Yours faithfully



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**SKYCITY Auckland**  
**Host Responsibility Programme**

**Report to the Gambling Commission**  
**for the 12 months ending**  
**31 December 2011**

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# 1. Introduction

This is SKYCITY Casino Management Limited's (SCML) seventh report on the implementation of its Host Responsibility Programme (HRP) and Problem Gambler Identification (PGID) Policy.

This report highlights key HRP-related activities undertaken in the 12 months to 31 December 2011.

As noted in SCML's previous reports to the Commission, the HRP and its related obligations are now well established at Auckland Casino. The 12 months to 31 December 2011 was therefore once again a period of largely 'business as usual' activities.

SCML is pleased with its progress in implementing the HRP and believes the profile and calibre of its host responsibility performance has improved significantly since the revised HRP took effect in December 2007.

Appendix 1 of the report contains the gambling-related measures required by section 3 of the HRP.

## 2. Key areas of activity

### 2.1 Use of loyalty data for host responsibility purposes

In September 2011 SCML presented to the Commission about the development of a predictive modelling tool (or algorithm) to help facilitate the identification of high risk customers vulnerable to problem gambling.

The tool will provide SCML with a significantly more rigorous, research-based means of analysing casino data than is currently set out in its HRP and in doing so, will further improve the company's harm minimisation and prevention capability.

The predictive modelling tool is significant from a public policy perspective because the analysis of casino data for harm minimisation purposes has been a subject of strong interest among regulators, academics and industry practitioners internationally. Only two other casinos in the world use this type of predictive modelling software to help them identify at-risk customers.

Focal Research, a Canadian research and data analytics consultancy, developed the tool for SCML. They are highly respected internationally in both the gambling research and data analytics fields.

SCML is currently embedding the model into its loyalty database and completing other pilot phase implementation activities such as staff training and designing reporting systems. SCML looks forward to updating the Commission on the model's implementation in 2012.

### 2.2 Data collection and analysis

In 2011 SCML saw a continued increase in the quantity of host responsibility related information reported. This trend has been discussed widely in previous reports to the Commission. The two notable statistics which best illustrate this trend are the number of customers about whom there have been observations (Measure 2 – up 24% in 2011 over 2010) and the number of observed indicators reported to Host Responsibility (Measure 3 – up 97% in 2011 over 2010).

SCML believes the reasons for these increases are several and include better reporting systems, notably the iTrak incident reporting software, and a general improvement in understanding among staff about recognising problem gambling indicators and the importance of reporting them. SCML is therefore pleased with these reported increases.

It is important to note that an increase in reported host responsibility observations does not necessarily mean an increase in gambling harm. In fact the number of customers about whom there have been observations includes casual staff interactions with customers. These conversations may in some cases be sufficient to prevent the onset of harm, as is their purpose.

Nevertheless it is important that staff note observations so that should further indicators be observed over time, staff are better placed to make appropriate judgements about what action to take.

### **2.3 Unaccompanied Children**

SCML is disappointed with the increase in the number of reported unaccompanied children incidents in 2011 (42) compared with 2010 (34) – refer to Measure 25 on page 13.

In response to the increase, SCML has instigated a number of measures over the last 12 months to assist in either preventing or quickly identifying instances of children being left unattended.

#### - Measures undertaken:

- Directed security patrols of known risk areas, including two dedicated security staff to patrol the car park 24 hours per day, seven days a week as well as an increased security presence in the atrium area during school holidays. These initiatives have been costly but are a pragmatic response to the increase in the number of incidents.
- Hotel booking sheets have been amended to include a 'check box' question for staff to note those guests checking in with children
- A dedicated wing in the SKYCITY Hotel has been designated for families to enable closer monitoring
- A brochure (available in four languages) explaining SCML's policy about children on site is handed to persons with children upon check-in
- Hotel staff have been trained to remind guests about child-minding services available through the concierge
- Additional signage in atrium areas reminding customers not to leave children unaccompanied
- The loyalty upgrade process is no longer undertaken during school holidays

SCML notes that levels two and three of the atrium area are designated as R18 after 7pm on Thursdays, Fridays and Saturdays and during other busy periods.

#### - Statistics

SCML has changed the reporting of unaccompanied children to include only those incidents where the parent or guardian was gambling or in the casino at the time a child was left alone. This method of reporting is consistent with what we are now reporting to the Department of Internal Affairs (DIA).

### **2.4 Staff training and responsible service of alcohol**

SCML has invested in a new online learning management system. The online training tool is used for a range of department-specific training as well as the introductory Host Responsibility Level 1 (HR1) and Responsible Service of Alcohol (RSA) training module for all new staff. SCML's Host Responsibility designed both modules. Learning & Development staff are available to assist staff in completing the online module that may have language difficulties or computer literacy issues.

A classroom-based half-day induction workshop (called 'Welcome') is still provided to all new staff during which host responsibility content from the e-learning module is covered along with other important policies, procedures and briefing information.

SCML's Host Responsibility team continued to make improvements to the content of both the Host Responsibility Level 2 (HR2) training (for selected staff and supervisor level employees in Gaming, Food & Beverage and Security & Surveillance) and Level 3 (HR3) training for management staff in contact with customers. HR2 training now incorporates a greater emphasis on the prevention of gambling and alcohol-related harm while problem

gambling service providers have been invited to present at various HR3 courses. These changes have been well received by staff.

Results of SCML's Host Responsibility 'mystery shopper' programme, as outlined in the December 2010 report, show staff are complying with ID checking procedures. The programme continues to be a useful tool in identifying areas for staff development.

#### - Responsible service of alcohol

SCML's bar staff have a process for recording the occasions when they slow or stop the service of alcohol to customers and offer food and non-alcoholic beverages. This proactive initiative, strengthened by the rigour of the reporting process and widened to include all casino bars in 2011, is intended to prevent intoxication and reduce the number of customers who leave or are evicted from the premises intoxicated.

The police's Alcohol Harm Reduction team has praised this initiative. SCML is not aware of any other licensed premises where similar initiatives are in place.

#### - Police Alcohol Harm Reduction team

The police's Alcohol Harm Reduction team (based in central Auckland) carried out random inspections at SCML during the reporting period. No issues of concern were identified. SCML also received visits from the District Licensing Authority throughout 2011 and they provided positive feedback on the business's compliance with licensing requirements.

As outlined in SCML's previous report to the Commission, the police's licensing team continue to meet regularly with SCML's Host Responsibility executives and attend various staff training sessions. This input from police is important to SCML and is well received by staff.

## **2.5 Other areas of interest**

#### - Stakeholder engagement

Stakeholder engagement activities continued to be an important role of SCML's Host Responsibility executives and corporate staff during the 2011 calendar year.

SCML hosted site tours for a number of problem gambling service providers including Problem Gambling Foundation Asian Family Services, Problem Gambling Foundation, Raukura Hauora, Tupu Pacific Services and Oasis (Salvation Army). SCML staff also visited the Gambling Helpline and Hapai Te Hauora Tapui, a regional Maori public health provider. Service providers indicate the site tours help improve their understanding of the casino's exclusion interview process as well as SCML's efforts in identifying and assisting problem gamblers, for example, how SCML uses confidential information it receives from third parties/concerned others about potential problem gamblers.

SCML maintains a strong and constructive relationship with the AUT's Gambling Research and Addictions Centre. Several academic staff from AUT visited SCML's table games training room and casino to learn more about various gaming products. SCML's Host Responsibility team made a presentation at AUT in 2011 about various HRP-related data.

SCML continues to convene Host Responsibility Community Liaison Group meetings. These are typically well attended by various service providers and DIA and provide a forum for discussion about a range of operational matters concerning SCML's host responsibility capability. SCML's Host Responsibility team were also invited to present at an Asian service providers' forum. Feedback was very positive.

SCML recognises the importance of these relationships for maintaining and building its reputation but more specifically as a means of increasing awareness and understanding of how it is fulfilling its responsibilities to prevent and minimise gambling harm.

#### - Multi Venue Exclusion (MVE)

The Salvation Army Oasis Centre has been charged by DIA and the Ministry of Health with carrying out a facilitation role in the MVE process in which it ensures all necessary exclusion documentation is sent to the gambling venue(s) elected by the excluding person.

Thirty six SCML customers elected to complete a Multi Venue Exclusion (MVE) in the year to 31 December 2011. The majority of these elect to exclude from Class 4 venues. SCML received three requests during 2011 for exclusion from persons who have elected in the first instance a MVE from a Class 4 venue or other non-SKYCITY-managed casino. SCML anticipates this number will grow as further MVE schemes are established around the country and gambling venues become more familiar with them.

SCML will continue to provide feedback to the Commission on this initiative.

#### - Employee Engagement Survey

In May 2011 SKYCITY commissioned another company-wide engagement survey to gauge employees' opinions and attitudes about SKYCITY as an employer. The survey included questions about host responsibility, including employee gambling-related harm.

Like previous surveys, the results regarding employee perceptions about host responsibility were very positive and indicate a strong positive correlation between employees' feeling about SCML's host responsibility performance and positive employee engagement. In other words, SKYCITY's ability or reputation as a responsible host may have a 'halo' effect on employees' overall impressions of the company as an employer. SCML is pleased with these results.

More commentary about the survey is shown in the commentary to Measure 23 on page 14.

#### - Bally gaming management system implementation

In 2011 SCML obtained approval from DIA to install a new gaming management system from a US gaming software company called Bally. The Bally system (to be installed at SCML in 2012) contains a range of promotional features which DIA approved for use by SCML on the condition that it assesses each promotional mechanic from a host responsibility perspective and provides an audit trail of such assessments.

SCML already assesses all gambling promotions from a host responsibility perspective as part of an internal approval process and as such does not foresee any difficulties in complying with DIA's requests relating to Bally promotions.

SCML will update the Commission on the implementation of the Bally software and any related host responsibility matters in due course.

#### - Re-entry conditions

As noted in SCML's December 2010 report, a proposal to change the number of counselling sessions an excluded customer must complete before being considered for 're-entry' (that is, permission from SCML to re-enter the casino's gaming areas after the expiry of their exclusion period) was under discussion between the casino and members of the Problem Gambling Community Liaison Group.

A decision was made to leave re-entry conditions unchanged, that is customers must show evidence they have completed a minimum of six counselling sessions. One option was to not specify the minimum number of counselling sessions but instead leave it open for counsellors and their clients to decide what was best for them. Opinions among service providers were varied about such a proposal.

SCML will review the matter again at a later date and keep the Commission informed about any changes.

## Appendix 1: Reporting Measures

MEASURE	SOURCE	DESCRIPTION	RESULT	
<b>1 Casino expenditure</b>	DIA	Actual dollars (non-inflation adjusted) for Gaming operators' financial year-end	\$434m for the year to 30 June 2011.	
<b>2 Number of customers about whom there have been observations</b>	SKYCITY	The total number of SKYCITY customers who have been observed showing one or more signs of problem gambling. These observations are reported in iTrak from a range of sources including shift reports, emails, phone calls, host responsibility logs, the unattended children log and other internal reporting mechanisms such as the log of unpaid parking fees.	2008 H1	308
			2008 H2	353
			2009 H1	325
			2009 H2	508
			2010 H1	822
			2010 H2	1256
			2011 H1	1233
			2011 H2	1349
<b>3 Number of observed indicators reported to Host Responsibility</b>	SKYCITY	Total number of observed indicators of problem gambling reported in iTrak from a range of sources including shift reports, emails, phone calls, host responsibility logs, the unattended children log and other internal reporting mechanisms such as the log of unpaid parking fees.	2008 H1	517
			2008 H2	537
			2009 H1	455
			2009 H2	715
			2010 H1	984
			2010 H2	1498
			2011 H1	1445
			2011 H2	1499
<b>4 Number of approaches to SKYCITY by third parties</b>	SKYCITY	Number of people approaching SKYCITY with concerns about a customer ie, triggering the creation of a GOI file and a SKYCITY (third party) exclusion investigation.	2008 H1	22
			2008 H2	41
			2009 H1	23
			2009 H2	26
			2010 H1	36
			2010 H2	32
			2011 H1	41
			2011 H2	36
<b>Commentary</b>	External third party inquiries from 1 January – 31 December 2011 resulted in 53 exclusions (35 self-exclusions and 18 SKYCITY-exclusions), up from a total of 32 (13 self-exclusions and 19 SKYCITY-exclusions) in 2010. Demographics of those customers about whom a third party approached SKYCITY during the reporting period were: males 62%, females 36% (remaining 2% is unknown, for example, gender was unclear from a name provided and no other records were available). Chinese and Caucasian remain the dominant ethnicities. The majority of customers were in the 50-59 years age group.			



<b>5 Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to the number of problem gamblers identified by the casino</b>	SKYCITY	Number of first time exclusions: 1) "SKYCITY-identified": Those who were proactively identified by SKYCITY or brought to SKYCITY's attention by a third party (eg, a family member) and offered information and assistance, prior to requesting self-exclusion; 2) "Self-identified": Those who approached SKYCITY and asked to self-exclude and/or proactively acknowledged that they had a gambling problem, without SKYCITY previously having identified them.				
			Total	SKYCITY identified	Self identified	Externally identified
		2008 H1	159	54	105	-
		2008 H2	183	18	138	27
		2009 H1	149	19	129	1
		2009 H2	137	12	118	7
		2010 H1	170	38	129	3
		2010 H2	184	55	119	10
		2011 H1	172	53	107	12
		2011 H2	206	68	124	14

<b>6 Number of customers on incident spreadsheet</b>	SKYCITY	Number of customers on Table Games and Gaming Machines Host Responsibility logs			
			Total	Gaming machines	Table games
		2008 H1	223	157	66
		2008 H2	164	74	90
		2009 H1	164	71	93
		2009 H2	228	38	190
		2010 H1	324	117	207
		2010 H2	367	147	220
		2011 H1	360	154	206
		2011 H2	446	239	207
<b>Commentary</b>	SKYCITY proposes removing this measure as it is a subset of measure 2) <i>Number of customers about whom there have been observations</i>				

<b>7 Number of Gambler of Interest (GOI) files by ethnicity, gender, age and preferred mode of gambling.</b>	SKYCITY	Number of active GOI files (i.e. files that are currently open/under investigation) with breakdowns by ethnicity, gender, age and preferred mode of gambling (table games or gaming machines), as at end of the period.	2008 H1	85
			2008 H2	87
			2009 H1	57
			2009 H2	72
			2010 H1	75
			2010 H2	82
			2011 H1	47
			2011 H2	71
<b>Commentary</b>	The figures above reflect the number of GOI files open on the last day of each reporting period. In total, 190 files were opened between 1 January and 31 December 2011. 193 GOI files were investigated and closed during the same period (this includes files that were already open on 31 December 2010). The figures include customers that may have become a GOI more than once during the year.  As SCML may not have established detailed information on all GOIs (especially when investigations are at an early stage) there are a small number of records for which ethnicity, age and preferred mode of gambling are unknown.			

**Split of open Gambler of Interest files by demographics and preferred game (for the full 2011 calendar year)**

**7.1 Open GOIs by ethnicity**

Chinese	52
Caucasian	19
Korean	4
Vietnamese	4
Thai	3
Malaysian	1
Other Asian	1
Maori	4
Samoan	0
Other Pacific Islander	0
Indian	5
Middle Eastern	2
Other	23
<b>Total</b>	<b>118</b>

**7.2 Open GOIs by age**

20 - 29	14
30 - 39	21
40 - 49	33
50 - 59	34
60+	16
<b>Total</b>	<b>118</b>

**7.3**

Male	75
Female	43

**7.4**

Table games	51
Gaming machines	28
Table games and machines	30
Unknown	9
<b>Total</b>	<b>118</b>

<b>8 Number of approaches to customers to offer information about self-exclusion</b>	SKYCITY	Total number of times information about self-exclusion has been given or mailed to customers and third parties, including instances where people declined to accept the information.	2008 H1	263
			2008 H2	457
			2009 H1	402
			2009 H2	523
			2010 H1	580
			2010 H2	562
			2011 H1	535
			2011 H2	488
<b>Commentary</b>	Data for this measure remains challenging to collect.  SCML collates this measure by aggregating 'approaches to offer information about exclusion' where procedures mandate that host responsibility packs (containing brochures on exclusion options and problem gambling service provider contact details) are provided to customers.  We believe that this figure is underestimated as it does not include casual interactions during which a customer has been informally referred to the exclusion brochures.			

<b>9 Number of Exclusions by:</b> • Ethnicity • Gender • Age • Preferred mode of gambling (tables/EGMs) • Prompted by third party disclosures • Exclusion type (self-SKYCITY) • Following re-entry	SKYCITY	Self and SKYCITY exclusions				
			Prompted by 3rd parties	Following re-entry	Re-exclusion	
		Total				
		2008 H1	168	9	22	-
		2008 H2	260	27	24	46
		2009 H1	227	8	9	36
		2009 H2	232	16	1	79
		2010 H1	244	10	25	34
		2010 H2	279	22	11	63
		2011 H1	251	24	5	58
	2011 H2	293	8	12	64	

**9.1**

	Total	Self-exclusion	SKYCITY
2009 H2	232	194	38
2010 H1	244	190	54
2010 H2	279	206	73
2011 H1	251	186	65
2011 H2	293	202	91

**9.2**

Male	193
Female	100

### 9.3 Exclusions by Ethnicity

	Chinese	Caucasian	Korean	Vietnamese	Thai	Malaysian	Other Asian	Maori/Other Pacific Islander	Tongan	Samoan	Indian	Middle Eastern	Other
2008 H1	57	33	18	5	6	7	6	11	0	0	4	7	14
2008 H2	99	43	27	9	7	1	19	11	0	0	15	9	20
2009 H1	84	35	22	5	4	4	9	18	3	2	14	11	16
2009 H2	79	49	11	8	0	0	20	23	1	8	15	11	6
2010 H1	91	43	14	6	6	0	19	17	3	4	25	8	8
2010 H2	95	40	21	7	6	3	19	21	11	0	31	16	9
2011 H1	71	31	20	7	11	0	5	19	5	11	25	4	42
2011 H2	81	38	18	8	12	4	3	16	4	8	35	4	62

### 9.4 Exclusions by Age

	20-29	30-39	40-49	50-59	60+	Unknown
2008 H1	41	49	37	31	9	1
2008 H2	87	62	61	40	10	0
2009 H1	79	48	47	37	14	2
2009 H2	69	55	64	30	10	4
2010 H1	77	53	65	37	12	0
2010 H2	76	71	81	35	16	0
2011 H1	64	54	79	37	17	0
2011 H2	91	49	74	54	24	1

### 9.4 Exclusions by Mode

	Gaming			Unknown
	Tables	machines	Both	
2008 H1	83	51	27	7
2008 H2	160	40	56	4
2009 H1	131	45	49	2
2009 H2	99	52	48	33
2010 H1	130	37	29	48
2010 H2	132	56	61	30
2011 H1	101	66	56	28
2011 H2	110	54	66	63

<b>10 Number of customers participating in Agreed Limitation</b>	SKYCITY	Customers participating in VIP Agreed Limitation arrangements over the reporting period and at its conclusion, ie including those whose arrangements concluded during the reporting period.	2008 H1	10	
			2008 H2	4	
			2009 H1	7	
			2009 H2	6	
			2010 H1	9	
			2010 H2	8	
			2011 H1	7	
			2011 H2	5	
				<b>Time-out period</b>	<b>Customers</b>
				3 months	2
			6 months	3	
			9 months	0	

<b>11 Number of excluded customers agreeing to be contacted by help services on exclusion form</b>	SKYCITY		Exclusions	Agreeing to be contacted	%
		2008 H1	168	29	17%
		2008 H2	260	70	27%
		2009 H1	227	56	25%
		2009 H2	232	31	13%
		2010 H1	244	29	12%
		2010 H2	279	41	15%
		2011 H1	251	37	15%
	2011 H2	293	41	14%	
<b>Commentary</b>	<p>SCML also tracks the number of exclusions in which customers nominated a mentor. This occurred in 164 of the 544 exclusions (30%) for the period 1 January 2011 to 31 December 2011.</p> <p>While SCML encourages customers during the exclusion process to seek help from problem gambling service providers, ultimately this is a decision for the customer.</p> <p>It should also be noted that excluded customers may contact counselling services independently after their exclusion and SCML would not be notified. Also, as part of SCML's re-entry conditions, excluded customers are required to undergo counselling.</p>				

<b>12 Numbers of new and total clients citing casino gambling (by CGMs and tables) as the primary mode who utilise Gambling Helpline and/or face-to-face counselling services, by:</b>	Ministry of Health	<b>Reference:</b> The latest service user statistics by gambling mode published by the Ministry of Health are shown on their website: <a href="http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data">http://www.health.govt.nz/our-work/preventative-health-wellness/problem-gambling/service-user-data/intervention-client-data</a>
	<b>Commentary</b>	<p>The Ministry of Health no longer reports service user data as shown in this particular measure (12) or in measure 13 (average South Oaks Gambling Screen scores). The only service user data now reported by MoH by gambling mode is the total number of clients (both new and continuing) that have received support for their own, or someone else's gambling.</p> <p>SKYCITY recommends that this measure be removed from the HRP, as mentioned in its previous six monthly reports to the Commission. SKYCITY will further discuss this and other recommended changes in separate submissions to the Commission regarding the review of SCML's HRP.</p>
<ul style="list-style-type: none"> <li>▪ Gamblers</li> <li>▪ Significant others</li> <li>▪ Mean SOGS scores</li> <li>▪ Ethnicity</li> <li>▪ Gender</li> <li>▪ Age</li> <li>▪ Self-reported dollars lost</li> </ul>		

<b>13 Average South Oaks Gambling Screen scores</b>	Measure deleted. Refer to commentary in measure 12 above.
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<b>14 Number of breaches of exclusion by ethnicity, gender and age</b>	SKYCITY	Breaches of self- and SKYCITY- (third party) exclusions including first and final warnings. Includes breaches of exclusions issued prior to the beginning of the reporting period and inactive exclusions for which a customer has not yet satisfied SKYCITY re-entry conditions and therefore not been granted permission to re-enter gaming areas.			
			Total breaches	Male	Female
		2008 H1	110		
		2008 H2	137	112	25
		2009 H1	121	77	44
		2009 H2	162	119	43
		2010 H1	210	162	48
		2010 H2	190	144	46
		2011 H1	182	119	63
		2011 H2	163	121	42

**Split of breaches of exclusion by type, age and ethnicity (for the full 2011 year)**

<b>14.1</b>	Breach of Exclusion (Self-ID)	72
	Breach of Exclusion (SKYCITY)	26
	Breach of Re-entry conditions	147
	Breach of RTLP	30
	Breach of Trespass	34
	Breach of First & Final	36
	<b>Total</b>	<b>345</b>

<b>14.2</b>	Chinese	128
	Caucasian	46
	Korean	22
	Vietnamese	15
	Thai	8
	Malaysian	3
	Other Asian	13
	Maori / Polynesian	13
	Samoaan	4
	Other Pacific Islander	1
	Indian	32
	Middle Eastern	10
	Other	50
<b>Total</b>	<b>345</b>	

<b>14.3</b>	20 - 29	82
	30 - 39	85
	40 - 49	100
	50 - 59	63
	60+	15
	Unknown	
	<b>Total</b>	<b>345</b>

<b>15 Number of successful and unsuccessful applications to re-enter following exclusion</b>	SKYCITY				
		Accepted	Rejected	Under consideration	
		2008 H1	51	7	
		2008 H2	62	10	
		2009 H1	46	9	
		2009 H2	52	14	1
		2010 H1	67	25	5
		2010 H2	60	15	0
		2011 H1	52	20	1
	2011 H2	52	15	3	

### 15.1 Declined re-entries by type

	Total	Insufficient counselling	Still at risk	Time not met	Breach in past 6 months	RTLP active	No application form	Undesirable	Further information obtained	None noted
2008 H2	10	2	2	2	0	1		3	0	2
2009 H1	9	3	2	1	1	1	1	0	0	2
2009 H2	14	4	0	1	0	0	3	1	0	5
2010 H1	25	4	0	2	1	5	2	0	0	11
2010 H2	15	4	0	2	1	2	2	0	4	0
2011 H1	20	7	0	2	0	4	2	0	3	2
2011 H2	15	2	0	2	1	4	2	1	2	1

<b>16 The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff)</b>	SKYCITY	<p>SCML's in-house 'mystery shopper' surveys of host responsibility performance such as customer identification-checking procedures show a high level of compliance.</p> <p>Staff perceptions of SCML's host responsibility performance were measured in a company-wide employee engagement survey. The results were very positive (refer to section 2.5 and measure 23) and are consistent with surveys in previous years.</p>
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<b>17 Number of persons trespassed or required to leave for making loans for financial gain</b>	SKYCITY	<table border="1"> <tr><td>2008 H1</td><td>2</td></tr> <tr><td>2008 H2</td><td>0</td></tr> <tr><td>2009 H1</td><td>0</td></tr> <tr><td>2009 H2</td><td>0</td></tr> <tr><td>2010 H1</td><td>0</td></tr> <tr><td>2010 H2</td><td>0</td></tr> <tr><td>2011 H1</td><td>0</td></tr> <tr><td>2011 H2</td><td>0</td></tr> </table>	2008 H1	2	2008 H2	0	2009 H1	0	2009 H2	0	2010 H1	0	2010 H2	0	2011 H1	0	2011 H2	0
2008 H1	2																	
2008 H2	0																	
2009 H1	0																	
2009 H2	0																	
2010 H1	0																	
2010 H2	0																	
2011 H1	0																	
2011 H2	0																	

<b>18 Number of Under the Influence (UTI) incidents</b>	SKYCITY	<table border="1"> <thead> <tr> <th></th> <th>Declined entry</th> <th>Evicted</th> </tr> </thead> <tbody> <tr><td>2008 H1</td><td>2000</td><td>182</td></tr> <tr><td>2008 H2</td><td>2016</td><td>227</td></tr> <tr><td>2009 H1</td><td>1506</td><td>83</td></tr> <tr><td>2009 H2</td><td>2336</td><td>184</td></tr> <tr><td>2010 H1</td><td>2236</td><td>146</td></tr> <tr><td>2010 H2</td><td>3161</td><td>259</td></tr> <tr><td>2011 H1</td><td>2756</td><td>217</td></tr> <tr><td>2011 H2</td><td>3051</td><td>240</td></tr> </tbody> </table>		Declined entry	Evicted	2008 H1	2000	182	2008 H2	2016	227	2009 H1	1506	83	2009 H2	2336	184	2010 H1	2236	146	2010 H2	3161	259	2011 H1	2756	217	2011 H2	3051	240
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<b>Commentary</b>	<p>SCML is taking a number of steps to prevent intoxication on its premises (refer to section 2.4). The number of customers denied entry due to intoxication is outside of SCML's control and may be a function of visitation (for example, higher numbers during the Christmas season) and the number of events on around Auckland's CBD. However, it appears the Rugby World Cup did not contribute to an increase in either statistics noted above because both figures were higher in the corresponding period (2H 2010).</p>																												

<b>19</b>	<b>Number of Police contacts citing SKYCITY as venue where their last drink was served</b>	NZ Police	Alcolink survey results	2007 H2	57
				2008 H1	22
				2008 H2	13
				2009 H1	14
				2009 H2	34
				2010 H1	24
				2010 H2	23
				2011 H1	21
				2011 H2	35
<b>Commentary</b>		6 of the 56 incidents in 2011 were noted as relating to 'extreme' levels of intoxication, the category of most concern to the police. In 13 of the 56 incidents, SKYCITY initiated the police attending an incident.			
		Police continue to provide positive feedback to SCML regarding the AlcoLink results and SKYCITY staff members continue to be vigilant around RSA.			

<b>20</b>	<b>HR1, HR2, HR3 and Refresher Training courses. Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level training.</b>	SKYCITY		Qualifying for training	% trained
			HR Level 1 (induction)	2813	87%
			HR Level 2 – classroom	391	82%
			HR Level 3	95	84%
<b>Commentary</b>		Refresher training is undertaken on an as needed basis, therefore numbers of staff needing training and percentages trained are not shown. SCML's new e-learning tool will assist in keeping track of when staff are due for refresher training, however, courses will continue to be offered to staff on as as-need basis.			

<b>21</b>	<b>Staff recall of knowledge and behaviours related to Host Responsibility and associated policies and procedures</b>	SKYCITY	<ul style="list-style-type: none"> <li>▪ HR1: As noted in section 2.4, HR1 is now delivered as an e-learning module. Staff must answer at least 80% of the course assessment correctly before they can complete the training. Staff are able to re-sit the module as required.</li> <li>▪ HR2: All participants completing HR2 take a knowledge recall test one month after completing the course. All staff who completed the course in 2011 passed the recall test with a number of staff scoring 100%. Any instances where a weak point in knowledge is clear, a manager is notified and these areas are discussed further in a one to one tutorial session.</li> <li>▪ HR3: Knowledge recall is not required for HR3.</li> </ul>
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<p><b>22 Staff perceptions of the effectiveness of training</b></p>	<p>SKYCITY</p>	<p><u>HR1 Evaluations:</u></p> <ul style="list-style-type: none"> <li>• New staff members continue to provide positive feedback regarding the host responsibility policies and procedures learnt at the Welcome course. The new e-learning module (to be completed before the Welcome course) is also assisting with recall and knowledge of host responsibility/RSA content such as indicators, legal obligations, policies and procedures covered during induction presentations.</li> <li>▪ Course evaluation sheets from Welcome courses during 2011 show staff rate the overall usefulness of the course as 3.6 out of a possible 4.</li> </ul> <p><u>HR2 Evaluations:</u></p> <ul style="list-style-type: none"> <li>▪ Feedback from staff who attended HR2 courses (and their managers) continues to show the training is highly valued. Anecdotal observations by Host Responsibility staff suggest staff are more confident about recognising and reporting problem gambling indicators and interdepartmental communication has improved.</li> </ul> <p><u>HR3 Evaluations:</u></p> <ul style="list-style-type: none"> <li>▪ Staff feedback shows the training overall was rated "very good" (4) or "excellent" (5) and the inclusion of treatment service providers was rated either "adequate" (3) or "very good" (4).</li> </ul>
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<p><b>23 Staff perceptions of the effectiveness of the Employee Gambling Harm Programme, reporting to the Commission to include percentage response rate of staff to the survey</b></p>	<p>SKYCITY</p>	<p>In May 2011 SKYCITY commissioned another company-wide engagement survey to gauge employees' opinions and attitudes about SKYCITY as an employer. The survey included questions about host responsibility, including employee gambling-related harm. The response rate to the survey among SCML employees was 74%, compared to 70% in 2010 and 71% the year prior.</p> <p>Like previous surveys, the results regarding employee perceptions about host responsibility were very positive. Responses to three out of the four host responsibility-related questions were in the top five of all 58 questions in the survey, the same result as 2010 and 2009.</p> <p>Analysis of the survey by the independent research company results showed that responses to the statement "I believe SKYCITY is a responsible host" was one of the top five drivers or determinants of whether or not an employee is engaged in their job and had a 78% favourable response from all employees. This indicates a strong positive correlation between employees' feeling about SCML's host responsibility performance and positive employee engagement. In other words, SKYCITY's ability or reputation as a responsible host may have a 'halo' effect on employees' overall impressions of the company as an employer.</p>
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<b>24</b>	<b>Number of internal and external underage incidents</b>	SKYCITY	Number of underage (or unable to prove age) customers found on gaming floor and number of underage (or unable to prove age) persons declined entry.	
			Found on gaming floor	Declined casino entry
		2008 H1	11	19,776
		2008 H2	6	21,003
		2009 H1	1	18,566
		2009 H2	5	19,397
		2010 H1	4	19,147
		2010 H2	2	19,003
		2011 H1	3	16,140
		2011 H2	7	16,889
	<b>Commentary</b>	SCML is disappointed to find any underage person on the gaming floor. When considered in the context of SKYCITY's average daily visitation numbers to the casino premises of 13,000 customers, the result is indicative of strong host responsibility performance. SCML takes identification checking seriously and is the basis of the mystery shopping research as outlined in measure 16.		

<b>25</b>	<b>Number of unattended children</b>	SKYCITY	2008 H1	12
			2008 H2	10
			2009 H1	6
			2009 H2	10
			2010 H1	13
			2010 H2	21
			2011 H1	16
			2011 H2	26
	<b>Commentary</b>	Incidents where parents or guardians were visiting the casino while they left their child/children unaccompanied.  SCML continues to review and assess its performance in this area. As noted in section 2.3, a range of measures has been undertaken to inform and encourage caregivers to remain with children at all times while visiting SKYCITY.		

<b>26</b>	<b>Number of Requirement to Leave the Premises Notices</b>	SKYCITY	Related to breach of exclusion	
			Total	
		2008 H1	80	48
		2008 H2	93	50
		2009 H1	82	45
		2009 H2	145	43
		2010 H1	122	48
		2010 H2	139	48
		2011 H1	108	52
		2011 H2	115	47
	<b>Commentary</b>	Compared to the number of exclusions currently in force, the number of breaches of exclusion remains relatively low.  These figures include instances where an RTLP notice was issued by Security, only to be later revoked in favour of an Exclusion Order issued by Host Responsibility.		