



SKYCITY ADELAIDE

HOST RESPONSIBILITY PROGRAM

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SkyCity Adelaide Host Responsibility Roadmap 2021

**Approval**

Effective Date:

Revised/Review Date: 01/09/2021

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Executive Manager Host Responsibility

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General Manager Support Operations

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COO – Australia

## **1. Introduction**

### **1.1 Background**

The SkyCity Adelaide Host Responsibility Policy has been developed to ensure compliance with the SKYCITY Entertainment Group's Host Responsibility Policy and State Regulatory legislation and license requirements.

Gaming is the core component of the Adelaide product. SkyCity Adelaide is committed to minimizing harm to customers and staff due to gambling and alcohol.

The Host Responsibility Program promotes the assistance and treatment available from service providers to its customers, by proactively engaging customers experiencing possible harm utilising case management practices in addition to facilitating the application of barring orders.

The Host Responsibility Program also monitors the service of alcohol in accordance with responsible service of alcohol guidelines.

### **1.2 Objectives of the Policy**

The objectives of the Policy are to:

- Provide a safe gambling environment at SkyCity Adelaide
- Provide information to customers and concerned family members on property-wide problem gambling processes which support customers seeking to stop gambling or moderate their behaviour, and to take positive action against those who breach these processes
- Consult with Gambling Help Services and support organisations
- Promote community awareness and education initiatives on moderating problem gambling and the services available for individuals seeking to control their behaviour
- Promote the responsible consumption of alcohol
- Recognise the need for staff to be alert for customers displaying problem gambling indicators and unlawful activities such as under-age gambling and drinking
- Develop staff competence and commitment towards good host responsibility, through the provision of ongoing staff training and support
- Ensure responsible marketing, advertising, promotion and external signage
- Enforce a standard of customer dress and behaviour

## **2. Management Commitment and Responsibilities**

The commitment of leaders at all levels to the Host Responsibility Program and their understanding and commitment is pivotal in the development of a culture within SkyCity. Senior Leaders are chartered with ensuring that the principles of the Host Responsibility Program are entrenched throughout the business via periodical training so that all staff are sensitive to the effects that gaming products may have on customers.

The Host Responsibility Program facilitates staff commitment to:

- Promote ethical and responsible behaviour
- Maintaining the highest ethical standards in the performance of their duties

- 2.1** The Harm Minimisation Committee will seek to explore site-wide initiatives to enhance the Host Responsibility Program promoting safe gambling and alcohol practices

## **3. Service Providers**

Sky City Adelaide will maintain open and frequent liaison, consultation, and involvement with key Gambling Help Service provider(s), to ensure:

- Service providers are familiar with the Adelaide Host Responsibility Team and Program.
- A shared understanding of contemporary responsible gambling practices and services.
- Service providers and Host Responsibility Coordinators have a mutual understanding of the policies and procedures of their respective organisations.
- Ongoing effectiveness and cultural appropriateness of procedures, training, internal and external communication
- Provision of a direct access to the gambling helpline
- Regular feedback to and from the Gambling Help Service providers

In addition, Adelaide will regularly liaise with the key counselling service providers to assess the effectiveness of the policy, and to identify development trends.

Sky City Adelaide contributes to the Gambling Rehabilitation Fund (GRF)

## 4. Staff Training

### 4.1 Introduction

#### **Policy Statement:**

SkyCity Adelaide is committed to developing staff awareness of host responsibility, especially with respect to problem gambling and excessive alcohol consumption.

This includes the provision of responsible gambling and responsible service of alcohol training conducted in house.

Training

- Commencement of employment; new employees will participate in Induction Training, part of which identifies problem gambling characteristics and excessive alcohol consumption.
- Basic and advanced training will also be an important aspect for those staff employed in relevant areas where customers gamble or consume alcohol

This training may be mandated with Sky City Adelaide expected to meet our legal obligations

### 4.2 Host Responsibility Training Program

Adelaide will continue to provide training programs appropriate to levels of service, workplace positions and management responsibilities. These programs are multi-media training programs for responsible gambling and the responsible service of alcohol.

Any Responsible gambling training programs will be regularly reviewed and revised to ensure they:

- Provide information about the effects of gambling on customers
- Include information on the recognition and identification of problem gambling behaviours
- Reflect the needs of all customers including gender, ethnicity, age, mental or physical disability and those requiring special attention
- Recognise cultural and social differences in the training process, particularly in course materials and presentations
- Ensure the processes for customer approach, intervention, referral, and follow-up are clear and well understood

To ensure effective and consistent implementation of the Host Responsibility training programs, Adelaide will also:

- Provide access to the Adelaide Host Responsibility Policy and a course workbook following a training session
- Undertake annual audit reviews of the training programs for compliance with the Codes of Practice

As a good employer, Adelaide will also take practical steps to ensure that staff with a potential or actual gambling problem are identified and referred for treatment.

## 5. Communication

### 5.1 Internal Communication

#### **Policy Statement:**

Management and staff commitment to, and a high level of awareness of, responsible gambling and alcohol consumption practices are pre-requisites for all levels of host responsibility by Adelaide staff. Regular staff communications are therefore essential, alongside training, ongoing monitoring of compliance with the policy, and recognition/reward.

#### **Implementing the Policy:**

To ensure effective and consistent implementation of the Host Responsibility Policy, Adelaide will:

- Include problem gambling and alcohol service issues, news and information in employee newsletters and magazines
- Display responsible gambling material in back of house areas to remind staff of the Host Responsibility Policy, and their responsibilities
- Advise all staff of any significant changes to the Host Responsibility Policy or property literature, via staff communications and refresher training
- Require and prompt managers and supervisors to discuss Host Responsibility on a regular basis

### 5.2 External Communication

#### 5.2.1 Customers, their Families and Friends

#### **Policy Statement:**

Adelaide believes individual customers, their families, friends and communities need to have a shared understanding of responsible gambling and responsible service of alcohol practices, together with SkyCity Adelaide. Equally each audience needs to have an understanding of their rights and responsibilities in relation to host responsibility practices.

To facilitate this Adelaide will endeavour to provide customers, their families, and friends with timely assistance and information. This in turn assists customers to make informed decisions about their personal gambling and alcohol consumption practices while at the SkyCity Adelaide. Adelaide also undertakes to provide a safe and supportive environment for the delivery of gaming and alcohol products and services to our customers.

Adelaide understands its obligations to a customer with regard to privacy and confidentiality. Adelaide employees are informed of their duties in relation to the privacy of customer information as described in the Privacy Act and other related legislation.

Adelaide will ensure that all gambling related advertising is undertaken in a manner that complies with current Government acts/laws.

To support this SkyCity Adelaide will:

- Prominently display signs as required by the relevant laws/acts
- Maintain a policy detailing the manner in which staff training and measures for intervention with problem gamblers are implemented (L&D?)
- Prominently display responsible gambling materials
- Actively encourage each customer, family member or friend, who contacts Adelaide for assistance, to contact the appropriate treatment provider for help and support
- Ensure that quantities of helpline cards are available as required
- Prominently display the time of day throughout gaming areas
- Ensure general information pertaining to the conduct of games, including the rules, is available to customers
- Adelaide will take all reasonable and practicable steps to ensure that a patron who demonstrates difficulty in controlling his or her personal expenditure on gambling products has his or her attention drawn to the name and telephone number of a widely available gambling service
- Reinforce the Host Responsibility Policy in appropriate customer newsletters and other communications
- Provide a Host Responsibility section on its web site with referral to the responsible gambling materials
- All gambling and alcohol advertising must be compliant with relevant codes of practice (whether mandatory or voluntary) and under the AANA (Australian Association of National Advertisers).

### **5.2.2 Community Liaison**

#### **Policy Statement:**

Adelaide will adopt a partnership approach to managing the issues related to responsible gambling and responsible service of alcohol. Customer approaches and managed responses will therefore involve community input and Adelaide will proactively seek this input.

To ensure this, Adelaide will liaise with relevant organisations – including key gambling help service providers, key community groups, local government agencies and key Adelaide/South Australian community leaders.

This liaison will ensure ongoing input into training, communication, customer approach, barring and other gambling management opportunities, and could include the establishment of a Community Liaison Group to include:

- Site visits for representatives from the community to become familiar with and discuss the Adelaide Host Responsibility Policies
- Regular meetings with the Adelaide problem gambling service providers
- Site visits for representatives of the gambling counselling service providers
- Responding to requests to make presentations to relevant groups, e.g. community groups representing those in the community at greatest risk
- Participation by an Adelaide representative in any external responsible gambling/responsible host meetings or conferences held in Adelaide/South Australia/Australia
- Presenting key Adelaide and South Australian community leaders with copies of the Group Host Responsibility Policy and/or the Adelaide Policy where appropriate

### 5.2.3 Media Relations

**Policy Statement:**

Adelaide will continue to provide a prompt service to media who inquire about the Host Responsibility Program via the Adelaide Communications Department.

To facilitate this Adelaide Communications will:

- Upon request, or in particular circumstances, develop appropriate media statements with Adelaide management
- Ensure all enquiries are responded to in a timely manner

## 6. Host Responsibility

**Introduction:**

The focus of the Host Responsibility Policy is:

- to support the identification of gambling and alcohol related harm and to provide information to anyone seeking help from relevant community support services
- The identification and approach of patrons who are recognised as having excessive alcohol consumption symptoms
- Compliance with the SkyCity Adelaide Responsible Gambling Code of Practice

To ensure this, specific policies have been developed for the Licensee Barring process, responsible service of alcohol, customer approach (for both problem gambling and excessive alcohol consumption), unattended juveniles and standards of dress and behaviour.

## 7. Early Intervention Program

**Introduction:**

Adelaide's Host Responsibility Program focuses on early identification of problem gambling and strategies to enhance intervention.

- The Program inception was a result of collaboration between Adelaide Casino and the Gambling Help Service providers. Adelaide and the help service sector, which initially included the Churches Gambling Taskforce, held formal meetings and developed targeted and meaningful initiatives towards dealing with problem gambling
- The program is a part of SKYCITY's existing comprehensive Host Responsibility Policy, which includes training for staff on harm minimisation and the responsible service of alcohol
- Host Responsibility Coordinators received training from experts in the field of problem gambling, intervention, and assistance strategies, mental health and suicide awareness and delivered by the Gambling Help Services
- The Host Responsibility Coordinators with this training and knowledge:
  - Monitoring customers to identify signs and indicators of problematic gambling behaviour
  - Using a Customer Service Approach (CSA) of anyone visiting our facility to identify potential issues
  - Offering assistance or information on various Gambling Help Services and resources available

- Facilitating contact between customers experiencing difficulty managing their behaviour with Gambling Help Services
- Communicating between Adelaide Host Responsibility and Gambling Help Services and any other appropriate treatment service
- Facilitating the process of barring, licensee barrings, third party barrings or Case Management
- Monitoring customers for signs of intoxication and taking appropriate steps to manage incidents with the support of Food & Beverage and Security
- Monitoring the effective distribution of responsible gambling information and materials throughout the facility

To ensure that the Program operates effectively it will be discussed during Service Provider Liaison meetings between Adelaide and the Gambling Help Services

### **7.1 Licensee Barring - Consumer and Business Services (CBS)**

#### **Policy Statement:**

To minimise the potential harmful effects of problem gambling on individuals and their families and friends, CBS provides a voluntary barring system. Adelaide ensures that every approach by a customer about this option is taken seriously while the customer is on the premises or telephone

SkyCity Adelaide rigorously enforces barring's to the extent reasonably possible with the use of Facial Recognition. Technology and relevant Persons of Interest

To ensure the effectiveness of barrings, Host Responsibility Coordinators will take necessary steps to:

- Encourage Gambling Help Service assistance and other gambling management strategies most appropriate for the individual
- Provide a translation service for those of linguistically diverse backgrounds (which may be a telephone interpreter service) during the application process
- Encourage third party involvement as a support person e.g. a family member
- Refer customers to CBS to apply to rescind the barring and devise an ongoing Case Management plan on the approval of an application
- Encourage a person to nominate a counselling service with whom Adelaide can contact at any time to review the patron's progress

### **7.2 Loyalty Program Cardholders**

#### **Policy Statement:**

It is the policy of Sky City Adelaide to de-activate Loyalty Accounts of any barred customers

To ensure this, the Host Responsibility Coordinators responsible for the administration of the barring system will:

- Advise relevant departments of a loyalty member applying for an CBS barring, and de-activate and amended the account to ensure that the customer is removed from the mailing database

Adelaide HRCs will ensure that the Loyalty Account is amended to reflect the

### **7.3 Responsible Service of Alcohol**

#### **Policy Statement:**

The Adelaide Responsible Service of Alcohol Program is designed to ensure guests enjoy an environment that is safe, responsible, and regulated. A key component is the Adelaide Responsible Service of Alcohol training program, which is required by the relevant State Regulator for all staff who work in areas where alcohol is served.

The following is the Adelaide Policy regarding the responsible service of alcohol:

- Adelaide will provide alcoholic beverages in a responsible manner, including monitoring and control of alcohol consumption
- Adelaide will maintain an effective Responsible Service of Alcohol awareness program to maintain staff knowledge about the effect of alcohol on patrons
- All Adelaide employees will receive an overview of the Responsible Service of Alcohol program during induction, including recognition of excessive alcohol consumption
- Those employees involved in the sale, service or monitoring and/or resolution of incidents of alcohol must complete the Responsible Service of Alcohol training Certificate
- Adelaide will take all practicable steps to prevent a person who appears to be intoxicated from being allowed to gamble
- Adelaide will take all practicable steps to prevent intoxicated people entering the casino or remaining in the casino gambling areas
- When appropriate, any patron may be asked for verification of identity and proof of age (legal age currently 18), before being served alcoholic beverages. If such identification cannot be produced, Security may be called to assist with verification and/or request that person to leave the premises
- Adelaide will ensure alcohol is not supplied to reward, promote, or encourage continued gambling
- Customers booking a function room for a private function will be made aware of our Responsible Service of Alcohol Program

### **7.4 Juvenile Control**

#### **Policy Statement:**

Adelaide Casino is committed to ensuring minors do not enter any gaming areas and will enforce the prevention of under-age gambling. Adelaide will take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gaming facilities (currently 18 in South Australia). Prior to the entry to the Premises Security staff may request proof of age from customers who appear twenty-five years of age or less. If customers are unable to provide sufficient proof of age, they may be refused entry

## **7.5 Unattended Juveniles**

In the event that a juvenile/minor is identified in close proximity to our Premise without adequate (or obvious) guardianship the following may occur:

- Employees will report the matter to Security or Host Responsibility
- The Host Responsibility Coordinator will attend to the child/ren and remain with them until such time as their guardian is located, or they are placed into custody of Police
- Security Officers will take all practicable steps to locate the guardian responsible for any unattended child
- In every case where negligence is suspected the Police are contacted and the guardian will be subjected to a barring consideration

## **7.6 Standards of Dress and Behaviour**

### **Policy Statement:**

Adelaide provides a comfortable environment where patrons can enjoy their surroundings without disruption from others who are inappropriately dressed or behave in an unacceptable manner. To ensure patron compliance with these principles, standards have been set for dress and behaviour

### **Dress code:**

Adelaide requires a neat and tidy standard of dress with overall appearance assessed as the primary indicator beyond individual items of clothing

### **Behavioural Standards:**

Should a person be detected intoxicated, abusing or threatening staff or other customers, causing conflict with other customers or staff, or otherwise behaving in a manner which affects the peace or comfort of other patrons, then Adelaide staff will take appropriate steps to stop the behaviour including having the customer escorted from the premises.

Patrons detected loan sharking or begging will be required to leave the licensed premises. Security personnel will investigate the incident and notify a Host Responsibility if the patron shows signs of, admits to having, or requests assistance in respect to problematic gambling. Should the matter of loan sharking arise beyond that of begging alms, the matter and individual will be reported to the AML officer

## **7.7 Suicide Prevention**

To best understand suicide prevention techniques, Host Responsibility Coordinators are competent in the:

- Identification of suicidal tendencies
- Suicide intervention training
- Mental Health Awareness

## **8. Responsible Marketing, including Promotions and Inducements to Gamble, Advertising of the Casino and External Signage**

Adelaide complies with the National Advertising Standards Authority and the SkyCity Adelaide Advertising Code of Practice

### Marketing

The principal marketing strategy utilised at SkyCity Adelaide is to establish the venue as an integral part of the total fun and entertainment experience for Adelaide and South Australian residents. To this end, SkyCity Adelaide offers a comprehensive entertainment proposition with restaurants, bars and entertainment

### Promotions and Advertising

Promotions and Advertising will be conducted as per the current laws/acts and approved through the legal department

### Radio and Television Advertising

Radio and Television Advertising will be conducted as per the current laws/acts and approved through the legal department

### Prize Advertising

Prize Advertising will be conducted as per the current laws/acts and approved through the legal department

## **9. SkyCity Adelaide Host Responsibility Management**

### **Policy Statement:**

Adherence to the Adelaide Host Responsibility Policy will be the responsibility of the Executive Manager Host Responsibility

The Executive Manager Host Responsibility:

- Regularly review the SkyCity Adelaide Host Responsibility Program and Host Responsibility Standard Operating Procedures
- Conduct regular audits and reporting requirements

## **10. Host Responsibility Policy Implementation**

To achieve the objectives of the Host Responsibility Policy the Executive Manager Host Responsibility will be assigned the overall responsibility for its implementation. Together with relevant other managers, will be tasked with the implementation of the policy and will regularly review progress

This structure will ensure that Adelaide coherently pursues best practices with adequate supervision and control of each element in the program and its implementation.

## **11. Reporting / Measurement**

The Host Responsibility Program will be subject to regular measurement and reporting.

- The Executive Manager Host Responsibility will undertake regular reporting to the Adelaide Senior Leadership team, Adelaide's Harm Minimisation Committee, the SKYCITY Entertainment Group Host Responsibility Committee and as required by the Governing body CBS

## **12. Policy Review**

As well as maintaining high standards acceptable to our customers, community and staff, Adelaide has a program of co-operating with regulatory bodies and government agencies in all matters. To maintain these standards, reviews will be instigated on a regular basis in relation to any issue pertaining to our business.

Adelaide will regularly review and will independently review the Host Responsibility Program with appropriate service providers and the Harm Minimisation Committee to ensure ongoing effectiveness.