



**Adelaide Casino
Host Responsibility Policy**

Contents

Adelaide Casino Host Responsibility Program

- 1.** Introduction
 - 1.1** Background
 - 1.2** Objectives of the Program
- 2.** Management Commitment and Responsibilities
- 3.** Involvement of Service Providers
- 4.** Staff Training
 - 4.1** Policy Statement
 - 4.2** Implementing the Training Program
- 5.** Communication
 - 5.1** Internal Communication
 - 5.2** External Communication
 - Customers, their Families and Friends
 - Community Liaison
 - Media Relations
- 6.** Host Responsibility and Early Intervention
- 7.** Early Intervention Program
 - 7.1** IGA Barring Process
 - 7.2** Loyalty Program Cardholders
 - 7.3** Responsible Service of Alcohol
 - 7.4** Juvenile Control
 - 7.5** Unattended Juveniles
 - 7.6** Standards of Dress and Behaviour
 - 7.7** Suicide Prevention
- 8.** Responsible Marketing, including Promotions and Inducements to Gamble, Advertising of the Casino and External Signage
- 9.** Adelaide Casino Host Responsibility Management
- 10.** Host Responsibility Policy Implementation
- 11.** Monthly Reporting/Measurement/Budget Control
- 12.** Policy Review

Appendices:

NIL

Adelaide Casino Host Responsibility Policy

Approval

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Manager, Host Responsibility

Manager, Legal & Corporate Affairs

1. Introduction

1.1 Background

SKYCITY Entertainment Group's vision is to create fun and entertainment. SKYCITY Entertainment Group is a leading Australasian gaming and entertainment company. It provides gaming facilities, restaurants, bars, and entertainment via its properties in Auckland, Adelaide Casino, Darwin, Hamilton and Queenstown.

The Adelaide Casino Host Responsibility Policy has been developed to ensure Adelaide complies 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. Adelaide is aware that its business has the potential to contribute to negative social impacts such as problem gambling and excessive alcohol consumption. Adelaide Casino is committed to minimizing harm to customers experienced due to gambling and alcohol.

The policy therefore promotes the availability of assistance and treatment from service providers to its customers, by proactively engaging customers experiencing harm through Case Management programs, as well as encouraging the use of barring options where appropriate.

The Host Responsibility Policy also monitors the service of alcohol in a socially acceptable manner.

Although Adelaide Casino acknowledges the existence and significance of problem gambling and is taking measures to prevent and minimize this phenomenon, the company does not assume any responsibility concerning the personal decision to bet or gamble, which decision remains the prerogative of the individual.

1.2 Objectives of the Policy

The policy is an important element in Adelaide's vision to create fun and entertainment. The objectives of the Policy are to:

- Provide a safe gambling environment at Adelaide Casino
- 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 dress and of behaviour

2. Management Commitment and Responsibilities

The commitment of Managers and Supervisors to the Host Responsibility Policy, and their understanding and fulfilment of their responsibilities, is pivotal for the development of the responsible host culture within the Adelaide Casino. For example, management are held responsible for ensuring the value of Host Responsibility Program is entrenched throughout the business via periodical training so that all staff are sensitive to the effects that gaming products may have on customers.

It is also imperative that management ensures a consistent responsible host culture amongst all Adelaide staff.

The Host Responsibility Policy demonstrates staff commitment to:

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

Hence, the Host Responsibility Policy ensures staff comply with the SKYCITY Adelaide Code of Business Practice.

SKYCITY Staff are not permitted to gamble at any SKYCITY premises.

3. Involvement of Service Providers

The Adelaide Casino will establish and 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 Department and its role in the company
- A shared understanding of responsible gambling practices and services is established and maintained
- Service providers and Host Responsibility Coordinators have a mutual understanding of the policies and procedures of each, to encourage both parties to work together on customer cases
- 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.

Adelaide Casino contributes to the Gambling Rehabilitation Fund (GRF) and is a member of the problem gambling help service network.

*** Also see Section 5.2.2 Community Liaison**

4. Staff Training

4.1 Introduction

Policy Statement:

Adelaide Casino 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 programs conducted on site and approved by the states senior regulator, the Independent Gambling Authority.

Training begins at the commencement of employment; managers are required to ensure new employees participate in Induction Training, which identifies problem gambling characteristics.

Basic and advanced training for relevant employees is conducted as per the Responsible Gambling Code of Practice.

Refresher training for staff will then be provided at least every 2 years. This shall reinforce host responsibility behaviours and prompt 'front-of-mind' awareness.

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 especially for responsible gambling and the responsible service of alcohol based on the SKYCITY entertainment Group program.

The problem gambling training programs are regularly reviewed and revised by SKYCITY Entertainment Group and Adelaide Casino to ensure they:

- Provide information about the potential effect of gambling on customers
- Include information on the recognition and identification of problem gambling traits
- 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
- Incorporate the experience of service provider(s) and frontline staff to assist with facilitation of the training, particularly those who over a period of time have regularly been associated with customers requiring customer approach under the Host Responsibility Policy

- 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 a summary of the Adelaide Host Responsibility Policy (to provide to all staff after induction training) and/or a course workbook
- 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 Adelaide Casino. 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 (as appropriate) 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 Adelaide Casino. 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 the Responsible Gambling Codes of Practice.

To support this Adelaide Casino 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
- Describe the roles of staff, by job title, in the implementation of this policy
- 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 in each gambling area
- 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 referral 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
- Adhere to the Australian Association of National Advertisers Code of Ethics and the SKYCITY Adelaide Advertising Code of Practice for responsible marketing and advertising of its facilities

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 and self-bar and other gambling management procedures, and could include the establishment of a Community Liaison Group as well as:

- 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 its Host Responsibility Policy 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 fashion
- Provide media training for appropriate Adelaide spokespersons

6. Host Responsibility and Early Intervention

Introduction:

The focus of the Host Responsibility Policy is:

- The prevention of gambling problems wherever possible and the identification, customer approach and provision of information and guidance for rehabilitation to patrons who are recognised as having problem gambling symptoms
- The identification and approach of patrons who are recognised as having excessive alcohol consumption symptoms
- Compliance with the Adelaide Casino Responsible Gambling Code of Practice (as approved by the Independent Gambling Authority)

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 Early Intervention Program focuses on early identification of problem gambling and intervention strategies.

- The Early Intervention Program is a result of collaboration between Adelaide and the Problem Gambling help service providers, who have welcomed the move. Adelaide and the Problem Gambling help service provider sector, which includes the Churches Gambling Taskforce and the Gambling Help Services network, have 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 given to all staff on harm minimisation and the responsible service of alcohol
- The program encompasses the introduction of dedicated Host Responsibility Coordinators, who are available 24 hours a day, 7 days a week
- Host Responsibility Coordinators have received specialist training prior to commencing their role. Training covers identification of problem gambling behaviour and appropriate intervention and assistance strategies. Continued training to maintain skills and knowledge related to the gaming industry is received through the GRF and various Gambling Help Services
- The Host Responsibility Coordinator training has been developed between Adelaide and Problem Gambling counsellors from Gambling Help services, who may be involved in the delivery of refresher training
- The Host Responsibility Coordinators are responsible for providing a service, during all operating hours, to customers, members of families and other staff. Specific responsibilities include:
 - Monitoring of customers and their behaviours to identify customers showing signs of actual or potential gambling problems
 - Using the Customer Service Approach (CSA) for customers showing signs of gambling problems (that either the HRC or other staff members have identified) and offering them assistance and information on the various counselling services and help resources that are available
 - Facilitating contact between customers who are experiencing difficulty managing their gambling behaviour and Problem Gambling treatment providers, including Gambling Help Services and any other appropriate treatment resources, e.g Gambling Helpline
 - Liaising between Adelaide and Problem Gambling treatment providers, including Gambling Help Services and any other appropriate treatment resource
 - Facilitating the processing of barring, licensee barrings, case management processes and third party-exclusion requests from individuals or families of individuals
 - Monitoring customers for signs of intoxication (this will be additional to the existing requirement of all staff in this area)
 - Monitoring the effective distribution of problem gambling information and materials throughout the facility

To ensure that the Early Intervention Program operates effectively it will be discussed during Service Provider Liaison meetings between Adelaide and the Problem Gambling Treatment Provider sector.

7.1 Independent Gambling Authority (IGA) and Licensee Barring Process

Policy Statement:

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

Adelaide Host Responsibility Coordinators, Security and Gaming staff rigorously enforces IGA barrings to the extent reasonably possible that barred customers are not allowed to enter, or remain in, gambling areas from which they have been excluded. Action is taken against those detected committing a breach of the licensee barring. Barred patrons attempting to re-enter the premises may face prosecution as stated in their agreement. Adelaide regularly reviews the effectiveness of these processes and, when necessary, makes amendments.

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

- Encourage Pre-Commitment Agreements, Case Management, Gambling Help Service Provider assistance or whatever other gambling management strategies may be most appropriate for the individual
- Provide the barring process when requested by a customer
- Provide a translation service for those of linguistically diverse backgrounds (which may be a telephone interpreter service) during the application process, if requested or deemed necessary
- Encourage third party involvement as a support person e.g. a family member
- Refer customers to the IGA to apply to rescind the barring and devise an ongoing Case Management plan on the approval of a rescission application
- Request the barred person to nominate a counselling service that they will make contact with and whom Adelaide can contact at any time to review the patron's progress
- Provide support to barred persons through the provision of immediate referral to, or liaison with, a counselling agency, with the permission of the client
- Emphasise correct ethnic processes and, wherever possible, encourage families and/or friends to accompany applicants
- Provide an updated database that is accessible to Host Responsibility Coordinators, Security and Gaming staff to ensure detection of patrons breaching the self-exclusion process

7.2 Loyalty Program Cardholders

Policy Statement:

Adelaide currently recognises loyal customers through its Rewards program. It is the policy of Adelaide to remove all barred customers from the loyalty program, or update their loyalty account and messages to reflect their status.

To ensure this, the Adelaide Host Responsibility Coordinators, responsible for the administration of the barring and breach records will:

- Advise relevant departments of a loyalty member applying for an IGA barring, and amend the account to ensure that the barred customer is removed from the mailing database
- Confiscate the Loyalty Membership Card from the barred customer and return to Rewards desk

Adelaide HRCs will ensure that the Loyalty Account is amended to reflect the exclusion status of the customer in a timely manner, and will take all practical and necessary steps to ensure that no communication will be received from the company while the exclusion is in place.

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 designed for all staff who work in areas where alcohol is served, to promote effective team work and to ensure guests enjoy this safe, responsible and regulated environment.

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

- Adelaide will provide the sale of alcoholic beverages in a responsible manner, including monitoring and control of alcohol consumption
- Adelaide will maintain an effective Responsible Service of Alcohol training program to provide education to staff about the effect of alcohol on patrons. This shall also incorporate guidelines to use in recognising excessive alcohol consumption
- All Adelaide employees will receive an overview of the Responsible Service of Alcohol program during induction as part of the Host Responsibility training program, including recognition of excessive alcohol consumption traits
- Those employees involved in the sale, service or monitoring and/or resolution of incidents involving the sale or service of alcohol (currently, Food & Beverage, Gaming, Guest Relations, Security and Host Responsibility) must complete the Responsible Service of Alcohol training program
- Those employees involved in the sale or service of alcohol (servers) must complete the relevant training to do so
- Responsible service of alcohol information must be displayed
- 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 or sold alcoholic beverages. If such identification cannot be produced, that patron will not be served or supplied with any alcohol and will be asked to immediately leave the premises
- Staff will 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 program to patrons when required
- Guests may not bring alcoholic beverages onto the premises where beverage service is provided, unless prior approval has been given
- Adelaide will ensure alcohol is not supplied to reward, promote or encourage continued gambling
- Customers contacting to book a function room for a private function must agree to abide by the Adelaide Responsible Service of Alcohol Program and procedures regarding responsible service of alcohol

7.4 Juvenile Control

Policy Statement:

Skycity is committed to keeping minors off all gaming floors and will rigorously enforce the prevention of under-age gambling in its casinos. 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 of any gaming area Security staff will request proof of age from any customer who appears twenty-five years of age or less. If customers are unable to provide sufficient proof of age they will be refused entry.

Adelaide Security and Food & Beverage staff are trained to be particularly vigilant for the presence of under-age persons, however any member of staff has the authority to approach suspected under-age gamblers and seek identification for proof of age.

7.5 Unattended Juveniles

Adelaide management does not tolerate juveniles who are loitering, or more specifically, left unattended on any part of its property:

- Employees are required to report to Security and the Host Responsibility Coordinator any incident where children may be left unattended on the premises or in a motor vehicle parked in a car park over which we have direct power or control
- Security Officers intervene and take all practicable steps to locate an adult responsible for an unattended child
- The Host Responsibility Coordinator will attend to the child (ren) and remain with them until such time as their parent or guardian is located, or they are placed into custody of Police
- In every case where negligence is suspected the Police are contacted by Security and the patron barred from the Adelaide property
- Advise the Manager of Communications and/or Manager of Legal and Corporate Affairs so precautions can be taken, if necessary, to reduce media and/or legal repercussions that may result by the incident

7.6 Standards of Dress and Behaviour

Policy Statement:

Adelaide provides a comfortable environment where patrons are able to 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.

The following will not be permitted at Adelaide:

- Torn clothes
- Gang patches or other insignias
- Thongs
- Dirty clothes or footwear
- Clothing featuring offensive language or imagery

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, in appropriate circumstances, having the customer escorted from the premises.

Patrons detected loan sharking or begging will be required to leave the licensed premises. Security personnel will initially investigate the incident, and will notify a HRC if the patron shows signs of, admits to having, or requests assistance in regards to a gambling problem. In some instances, Adelaide may also bar the patron from the premises.

7.7 Suicide Prevention

To best understand suicide prevention techniques, Host Responsibility Coordinators and appropriate senior operational Adelaide Security staff are trained in the:

- Identification of suicidal tendencies
- Suicide prevention responsibilities
- Suicide intervention training

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 Adelaide Casino Advertising Code of Practice

Marketing

The principal marketing strategy utilised at Adelaide is to establish the facilities as an integral part of the total fun and entertainment experience for Adelaide and South Australian residents and visitors to the region.

To this end, Adelaide offers a comprehensive entertainment proposition with restaurants, bars, entertainment – including regular live performances – and casino offerings.

Where feasible, Adelaide will develop marketing programs, both on its account and collaboratively with South Australian tourism operators, to drive regional, domestic and international visitation to Adelaide.

Promotions

Promotions will be conducted responsibly and will not be designed to induce patrons to either drink or gamble to excess.

Advertising

Adelaide will ensure that, when it advertises its gambling products, the advertising complies with National Advertising Standards Authority and the Adelaide Casino Advertising Code of Practice.

Radio and Television Advertising

When Adelaide advertises using radio and television mediums we will ensure that the advertising does not include sounds normally associated with the playing of gaming machines, including but not limited to:

- the sound of coins landing in a coin tray
- any sound made by a gaming machine when a prize is won

Prize Advertising

When advertising our gambling products in a manner that refers to, or relies on, the value or nature of one of the prizes which are available to be won (whether or not the prize is a prize of money) or the frequency with which the prize might be won, the advertising:

- will include sufficient information to allow a reasonably informed person to understand the overall return to player, or if the product does not have an overall return to player, the odds of winning and
- in addition, if the advertising is intended to encourage a person to gamble during a particular period, will include sufficient information to allow a reasonably informed person to appreciate how likely it is that the prize will be won by someone during that period

The Advertising Codes of Practice and Responsible Gambling Codes of Practice will be available upon request at customer service points.

9. Adelaide Casino Host Responsibility Management

Policy Statement:

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

Adelaide has formally appointed a Manager who will work with Adelaide Senior Management to:

- Identify other managers who will be tasked with implementing the program. This is currently done by each HRC liaising with a frontline department on a regular basis to implement departmental initiatives
- Mentor and performance manage Host Responsibility Team members to ensure department and individual KPI's are achieved
- Regularly review the Adelaide Host Responsibility Policy and Host Responsibility Standard Operating Procedures
- Complete regular audits and reporting requirements

10. Host Responsibility Policy Implementation

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

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. Monthly Reporting / Measurement / Budget Control

Policy Statement:

The commitment to the Host Responsibility Policy will be confirmed by the establishment of regular measurement and reporting systems:

- The Host Responsibility Manager will produce regular reports for Adelaide Management and the SKYCITY Entertainment Group Manager – Host Responsibility

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 an as required basis in relation to any issue pertaining to our business.

Adelaide will regularly review and, where necessary, independently review the Host Responsibility Program with appropriate service providers, to ensure ongoing effectiveness.