

RISK CONTROL CONSULTING

Components of an Alcohol Management Plan for Casinos

The best approach for dealing with impaired or intoxicated guests that visit your casino resort is to have a plan. A plan is critical to not only establish procedures and training for all effected department staff, but also to ensure the safe handling of guests.

Below are the key components that should be considered for developing an Alcohol Management Plan. Once finalized, your plan should be reviewed by the Tribal board and your Tribe's legal counsel.

1. Stop the Impaired or Intoxicated Person from Entering Operation

- a. Consider posting one or more security personnel at each entrance to greet patrons. Their responsibilities should include identifying intoxicated or impaired guests.
- b. Establish protocol for appropriate interaction with guests identified as potentially being under the influence of drugs and/or alcohol. Care should be taken to NOT make unwarranted accusations or hardline diagnosis of the individual's condition.
- c. Train security to include TIPS, carefully chosen questions, de-escalation techniques and protocol for escorting individuals and communicating to staff to avoid re-entrance and/or services.

2. Key Roles and Responsibilities

a. Management & Supervision

- i. Respond to their area at the request of a server when alcohol is exercised or considered based upon a patron's actions.
- ii. Communicate to applicable employees regarding guests who have been cut off to ensure they are not served in another location.
- iii. Interact with security as appropriate and when services are refused including those offered by servers, valet, etc.
- iv. Communicate with Surveillance to ensure that video is saved and the individual in question is appropriately monitored throughout the process including refusal of services and dismissal from the property.
- v. Document all efforts include names of involved patrons, witnesses to any incidence and employees. Keep reports factual (5W's - Who, What, Why, When and Where).

b. Security

- i. First line of defense as customer service and security representative at Casino entrances, response to altercations, inappropriate actions, threats, etc.
- ii. Escorts suspected and/or involved individuals to holding or detaining areas as appropriate until law enforcement arrive.
- iii. Determine when tribal or local law enforcement is called and involved.
- iv. Arrange "safe ride" via uber, lyft, or taxi to the individuals home or place of stay.
- v. Interact and direct response when guests are presumed to be impaired or intoxicated.
- vi. Document all interactions when there have been altercations, verbal or physical threats or guests escorted off of the premises.
- vii. Collaborates with F&B management or servers to appropriately work with guests that are denied the privilege of being served alcohol.

c. Surveillance

- i. Monitor guests for signs of impairment or intoxication.
- ii. Contact Security when monitored guests are presumed to be under the influence of drugs and/or alcohol or following related incidents which may indicate excessive use, impairment or intoxication.
- iii. Monitor guests who have been escorted off of the premises or detained and released when tribal and/or local law enforcement is involved.

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d. Servers

- i. Reports excessive drinking incidents to management and/or security as outlined in the alcohol management plan.
- ii. Immediately notify direct supervision and/or security when patrons appear to be significantly impaired or intoxicated.

3. Establish Procedures for Identifying and Addressing Intoxicated or Impaired Guests

a. Management

- i. Establish staff communication protocol to ensure that patrons appearing to be under the influence are successfully managed regardless of what activities the individual(s) are involved in.
- ii. Develop parameters to guide security and management and ensure safe escort off premises, detainment and tribal or local law enforcement intervention.
- iii. Create “Rules of Engagement” and “Use of Force” policies to exercise the absolute minimum force required when interacting with patrons as a result of verbal threats, physical assault and/or other forms of violence or acts involving drug use or excessive alcohol use.

b. Beverage service procedures

- i. Establish directives to guide servers in the desired approach, interaction and communication related to potentially impaired or intoxicated guests.

c. Security procedures

- i. Establish pre-entry actions to be taken when a guest entering the establishment is suspected to be impaired or under the influence of drugs or alcohol. This should include:
 - a) Policies to appropriately interact with a guest that becomes agitated, abusive or threatening as a result of excessive alcohol use.
 - b) Triggers requiring Tribal Police or Local Law Enforcement intervention.

d. Surveillance procedures

- i. Establish surveillance protocol to include:
 - a) Suspected excessive alcohol consumption, intoxication and/or drug use.
 - b) Detained and/or escorted guests or include removal from the premises as a result of excessive alcohol consumption, intoxication and/or drug use.
 - c) Communication protocol for surveillance when guests attempt to re-enter the facility.

4. TIPS & Procedures Training

- a. Affected staff must receive TIPS training as well as additional training to include the Alcohol Management Plan or Policy and related subjects which may include but not be limited to:
 - i. De-escalation
 - ii. Use of Force protocol
 - iii. Anti-Harassment policies
 - iv. Reasonable suspicion

5. Rules of engagement when interaction with potentially impaired or intoxicated guests

- a. Create rules of engagement for management and impacted staff to ensure appropriate interaction and avoid false claims. These should include but may not be limited to:
 - i. Respectful interaction with guests presumed to be intoxicated or under the influence
 - ii. Escorting and detainment procedures
 - iii. Surveillance procedures to secure video
 - iv. Use of Force policy

6. Escorting and Removing Guests from the Premises

a. Follow Jurisdictional Requirements

- i. Establish process for removal from the premises – which meets the requirements established by the local jurisdiction to include public policy and tribal law. This should include specific directives for decision makers, step by step actions and ensuring guest and staff safety.

b. Transportation

- i. Create valet process to reduce potential guest driving under the influence of alcohol and/or drugs as a result of service refusal and/or incoming guest's suspect of being under the influence of drugs or excessive alcohol use. This should include:

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- a) Appropriate staff involvement in the process
- b) Internal communication policies
- c) Actions to take as a result of non-compliant guest
- d) Triggers for immediate interaction with Tribal Police and/or local Law Enforcement
- e) Pre-arranged ride service with Uber, Lyft, or local Taxi service
- f) Rendering vehicle non-operable for the operator's safety (e.g. supervised key storage, use of wheel locks, etc.)

7. Documentation

- a. Develop documentation requirements to ensure that all aspects of the plan are appropriately documented. The documentation policy should include review, audit and post incident evaluation to ensure that objectives were appropriately accomplished. Revisions to the Alcohol Management Plan should be accomplished when gaps in the policies are identified and require enhancements to ensure guest and staff safety and to protect the assets of the casino.

For additional information contact: Tribal First Risk Control Solution Center Toll Free Help Line: 888 737 4752.

This Tribal First Risk Control Consulting safety program and best practices suggested herein should not be regarded as legal advice. Readers should pursue the direction and guidance of the Tribe's General Counsel's office in conjunction with the office of Public Safety were applicable. For more information on this topic, please contact Tribal First Risk Control Consulting at (888) 737-4752 or riskcontrol@tribalfirst.com