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Mr Rowan Harris
 Principal Major Licence Officer
 Licence Management and Audit
 Victorian Commission for Gambling and Liquor Regulation
 Level 3, 12 Shelley Street
 RICHMOND VIC 3121

By Email

Dear Mr Harris

Sixth Review of the Casino Operator and Licence (Sixth Review) - Recommendation 10 Follow-up Queries

I refer to your letter of 15 January 2020, requesting further information in relation to Recommendation 10 of the Sixth Review. Following and appended, please find Crown Melbourne Limited's (**Crown's**) responses to those further queries.

The Reporting Period is 1 July 2019 to 31 December 2019 (**Reporting Period**) and as at 31 December 2019, Crown has successfully issued 35 Time Out Program Agreements (**TOPAs**) as part of the three or six month TOPA trial (commencing 1 July 2019). We reply to each of your queries in turn:

1. Number of self-exclusion conversations in the first instance, including details of the outcomes of the conversations (self-exclusion, TOPA or no action).

The following table (Table 1) reflects the number of persons who discussed Self-Exclusion with Crown during the Reporting Period and the outcome of that discussion.

	<i>Self-Exclusion</i>	<i>TOPA</i>	<i>No Action</i>	<i>Total</i>
<i>01/07/19 – 31/12/19</i>	<i>286 (71.2%)</i>	<i>35 (8.7%)</i>	<i>81¹ (20.1%)</i>	<i>402</i>

¹ These customers were offered Crown's usual suite of support, for example: referred to external government funded support services, provided with the option to have any promotional material suspended, advised about the 100-day challenge, offered in-house counselling/chaplaincy support etc.

2. Number of active TOPAs and self-exclusions at start and end of the Reporting Period.

Table 2

	Active Self-Exclusions	Active TOPAs	Total
<i>As at 01/07/19</i>	5,230	0 ²	5,230
<i>As at 31/12/19</i>	5,476 (99.53%)	26 (0.47%)	5,502

3. Number of three-month TOPAs extended for a further three months.

As at 31 December 2019, no customers have extended their TOPA within the Reporting Period.

4. Number of TOPAs which extended to self-exclusion.

As at 31 December 2019, no customer has extended their TOPA to a Self-Exclusion within the Reporting Period; however, one customer returned to the Responsible Gaming Centre (RGC) and proceeded with Self-Exclusion after their TOPA expired, there is no recorded gambling activity between the conclusion of their TOPA and the commencement of their Self-Exclusion.

5. Number of players detected and interviewed by Crown after returning to gambling post the conclusion of the TOPA, including the outcome of the interview (permitted to return to gambling or a further TOPA/self-exclusion imposed).

Within the Reporting Period, four customers were issued a TOPA and have since returned and been interviewed³ by Crown post the conclusion of their TOPA. The following table sets out their responses:

² There were no TOPAs existing under the new trial format as at 01 July 2019; however, there were 23 three month TOPAs already in operation prior to the implementation of this trial.

³ Crown asks at the initiation of the TOPA that if the customer returns to Crown, that they attend the RGC to participate in a Gambling Resumption Information Program (GRIP), however each person is tagged on the Responsible Gaming Advisor pager, so that we are informed when they return. Patrons are permitted to return to gaming when their TOPA expires; there is no requirement to seek permission.

Table 3

TOPA Date	GRIP Date	Interview outcomes		
		How was the program helpful?	Would you consider Self-Exclusion?	Why do you want to come back?
14/08/2019	25/12/2019	My wife is much happier. I have focused on other interests.	I probably would consider another time out but not Self-Exclusion	Because I have a Christmas lunch with my family today.
21/08/2019	23/11/2019	It was helpful.	No. I don't think my problem is to that extent.	I am over-exaggerating the problem. I have learnt from the experience.
25/09/2019	26/12/2019	It was pretty good. It worked on me	No, not really	I just want to have some fun at the casino
29/09/2019	29/12/2019	Not really	No. I am not addicted	Just for fun

6. Number of resumptions of TOPAs (ie. patrons whose TOPA has expired, resumed gambling, and then requested a further TOPA).

As at 31 December 2019, within the Reporting Period no customers have had their TOPA expire, resumed gambling and then requested a further TOPA.

7. Number of TOPA breaches detected.

Table 4

TOPA Breaches	4
Unique Persons	3

8. Any other data that Crown captures that would assist the Commission.

Please refer to the dashboard attached at Appendix A.

I also provide the following in relation to the Commission's qualitative data requirements in relation to the TOPA trial:

1. An indication of the gambling profile of patrons agreeing to TOPAs, if available.

Attached at Appendix A, please find a dashboard illustrating the gambling profile of the participants, inclusive of the following information:

- Gender;
- Average age;
- Years of Membership;

- d) Win vs loss (yearly break down over the past 4 years⁴, 2016-2019);
- e) Hours spent gaming (yearly break down over the past 4 years, 2016-2019);
- f) Known to RG prior to TOPA;
- g) Whether they had self excluded prior to TOPA; and
- h) Whether they had a TOPA (3 month only) prior to this TOPA trial.

2. Any useful information gathered during the initial interview with patrons where the TOPA was offered and accepted, in particular the reasons for patrons agreeing to TOPAs, instead of self-exclusion.

Participants in the Time Out Program are asked how they became aware of the Time Out Program and why they declined Self Exclusion (and chose Time Out). Respondents learned about the Time Out Program primarily via a Responsible Gaming Advisor or a friend.

During the Reporting Period, responses from participants were predominantly as follows:

Why they agreed to enter a TOPA

- a) To save money/financial losses;
- b) Trying to stay away;
- c) Regain control; and
- d) Save relationship.

Why they chose TOPA over Self-Exclusion

- a) Self Exclusion is too long, want a short break;
- b) Want to stay out for six months only; and
- c) Not sure about Self-Exclusion, want to try Time Out first.

The TOPA was initiated (in response to anecdotal evidence from the Responsible Gaming Advisers) to capture a population of customers who did not want to self-exclude but wanted to make a commitment to stay away from the casino. The reasons proffered by customers for selecting TOPAs appear to support the rationale for the program. More information for the success or otherwise of the program will become clearer after analysis of follow up interviews and evaluation over a twelve to eighteen month period.

3. Available feedback from patrons in relation to TOPA service delivery and outcomes.

I refer to question 2 above, where qualitative information is provided about the TOPAs. More fulsome information is not yet available as in this Reporting Period, only a small number of customers who undertook a TOPA returned to be able to participate in the GRIP.

4. Results from the periodic monitoring of randomly selected persons who returned from a TOPA, as far as any observable signs and data can allow.

This information is not yet available, as customers who could be approached have not been detected on the casino gaming floor to effect the periodic monitoring.

⁴ Four years was thought to provide a sufficient prior period overview of the applicant's gambling behaviour, prior to entering into their TOPA.

5. A report on Crown's own assessments of its TOPA trial.

As the evaluation is still in its infancy, the information provided in response to your queries above, forms the quantitative and qualitative tracking data to date. However, the early indications are that the trial has had a positive introduction to Crown's suite of responsible gaming initiatives. As the trial is in its early stages, is not promoted and has been running less than nine months, extensive data is not yet available.

Please do not hesitate to contact me if you have any queries.

Yours sincerely,



Michelle Fielding
Group General Manager – Regulatory and Compliance

Encl.