To: Jason Cremona[redacted]
From: Jason Cremona[/O=VCGLR/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2FBCB8D9EE27401BACBE41B25672219F-JASON CREMONA]
Sent: Thur 3/14/2019 2:45:16 PM (UTC+11:00)
Subject: CASINO REVIEW FOLLOW UP DISCUSSION WITH CROWN (9 recommendations due…

CASINO REVIEW FOLLOW UP DISCUSSION WITH CROWN (9 recommendations due 1 July 2019) - JP and MF on 13/3/2019

RH provided an updated on the meeting and the Commission consideration of the 2.5 recommendation. Comms next week to Crown

Recommendation 3

- Expecting report from Deloitte in coming weeks in relation to risk framework suitability
- Risk management strategy, being developed, to sit behind framework document being reviewed by Deloitte
- Main issue is formalisation of risk appetite
- Rick matrix positively received in consultation internally and externally

Recommendation 4

- Gaming initiatives form implemented
- Supported also by the CURA and Compliance framework document submitted to the VCGLR
- CURA focuses on reporting aspect, or reactive to compliance issues as they arise.
- JC questioned if wether the Gaming Initiative Form could be reference in other ICS's, as it is only captured in EGM ICS. Noted and JP advised that this would be considered.
- Aiming for 1 April for submission
- NEED TO ASSESS COMPLIANCE FRAMEWORK AS PART OF ADDRESSING THIS RECOMMENDATION. SPEAK TO RH ON HIS RETURN.

Recommendation 10

- JP advised that Crown has no interest in removing self exclusions older then 10 years. Advised that this was made clear to review and Crown intends to articulate this as part of its 'review', and note the the further assessment over 2 years post 1 July 2019 is not required.
- JC noted that Crowns submission needs to be clear on:
    - No improvement to administrative process if older SEO removed, and
    - Legal challenges and concerns.
- Short term self exclusions discussions progressing well and working on best fit. Consultation with VRGF and VCGLR progressing.
- JP noted that internal discussions still ongoing re landing on appropriate timing of SEO.
- Seeking external engagement to assist in determining the ideal approach, in particular managing the return to the casino, ie; return before a revocation submission and assessment, and not automatic return after defined period.
- Timing of engaging expert could challenge the timeframe. JP advised it will proactively engage with VCGLR is timing challenged. CONSIDER TRANSITIONING OUT STATUS TO AMBER/RED.
- JP advised that Crown happy to review, what Crown deem to be a robust and appropriate process.
- ST question the provision of external report. JP noted that they may rely on legal privledge and may need to consider, upon receipt, if the report can be circulated, ie; if it airs 'weaknesses' that would be a concern from Crown and they would rely on legal privilege.

Recommendation 11

- Ongoing discussion via tripartite discussion.
- JP advised that matter is progressing in light of developed policies in Perth.
- JP confirmed the Melbourne based policy is still being developed.
- JP noted major challenge is progressing a third party SEO with consideration to consequences on third party, ie; if third party does not want the evidence supplied to SEO party, how to progress.

- Further formal submission pending.
- Transitioned to 'green' as well on track for meeting deadline.
- ST TO REVIEW MINUTES RE CONSIDERATION OF PERTH POLICY SUBMITTED TO THE VCGLR RE THIRD PARTY SEO. NOTE ANY ACTION POINTS NOTED.
- ORGANISE MEETING WITH VRGF TO CONSIDER INITIAL POLICY POSITION PROVIDED.

Recommendation 12

- Almost done with FRT rolled out to all entrances. Issues is only about ongoing reporting requirements re effectiveness.
- Neo Face very effective in comparison to earlier models tested.
- JP and MF noted that update to be provided with high level statistics regarding the effectiveness of the system.
- Jp initially noted the effective reporting would come after 1 July 2019. JC noted that Crown should consider reporting in line with 1 July 2019 to ensure Commission accepted the effectiveness arguement and close the rec at this point in time. Risk that Commission don't close rec without effectiveness reporting. JP noted and would consider.
- MF raised concerns about number of quarterly reports. JC acknowledged that ceasing these reports would be considered after several quarters of reporting and would be presented to Commission for consideration.

Recommendation 13

- Dependant on completion of recommendation 14

Recommendation 14

- JP noted 'should' rather then 'must'
- JP noted that Crown will look to develop strategy and submit to address the recommendation, and not for consultation.
- JP noted that implementation will come post addressing the submission
- JP noted that 'big piece' but progressing, even though challenges are evident in meeting deadline.

Recommendation 17

- JP noted that ongoing meeting with AUSTRAC over 2 years. Strong AML/CTF outcomes.
- JP noted that looking to introduce joint program across Perth and Victoria, working closely with AUSTRAC. 'Significant price of work' but not overly linked to recommendations (almost above and beyond it)
- JP noted that strengthening references in internal control would be somewhat limited to the 'reference to AML internal program/processes' and framework documents'. Not sure if this is appropriate.
- JC questioned if 'suitability of control statements' has been discussed with AUSTRAC. JP noted that it has not been.
- JP noted that the fundamental issue re AML/CTF is internal AML program and not ICS.
- JC noted that ICS should support AML program
- JC noted concern that response does not specifically address the recommendation.
- JP concerned to relevance and 'issue' addressed in recommendations, yet reluctantly accepted.
- RH questioned the 'issue' noted in the report re junket ICS. JP noted that this was an observation and would not 'drive' the review outcomes.
- JC noted clear expectations re consultation with AUSTRAC.

Recommendation 19

- Policy existed and minor tweaks made.
- Expect submission soon.

Sent from my iPad