

Sixth Casino Review - recommendation 10 (TOPAs ongoing monitoring) - Commercial in Confidence

Rowan Harris <[REDACTED]>

Mon 22/02/2021 2:13 PM

To: Tony Phillips (DJCS) <[REDACTED]>

Cc: Brett S Hetherington (DJC [REDACTED]); Lindsay D Shaw (DJCS) [REDACTED]; Jason Cremona (VCGLR [REDACTED]); Steve Thurston (VCGLR [REDACTED])

📎 7 attachments (209 KB)

VRGF response to VCGLR draft on Crown TOPA trial.docx; VRGF - results of Crown TOPAs trial - 20201021_BH Comments.docx; image001.png; image002.png; image003.png; image004.png; image005.png;

Dear Tony

Hope you are all well.

Further to the previous emails below, the Commission at its January 2021 meeting in relation to Crown's Time Out Program Agreements (TOPAs) evaluation trial:

- agreed that TOPAs can continue to be offered and do not need to transition to a formalised exclusion order under section 72(2A) of the *Casino Control Act 1991* (at this point in time).
- directed Crown to provide the VCGLR with ongoing visibility of TOPAs via reporting arrangements to be determined by the Director, Licensing.

In relation to the ongoing **monitoring** of TOPAs, the VCGLR will request Crown to continue providing the data and information that was initially agreed with the VRGF. This data and information is reflected in the VCGLR's Summary of the Trial results provided to the VRGF (attached).

We note from the VRGF's earlier responses to the VCGLR's Summary of the Trial Results that *"the monitoring should contain more information than in the current trial"* to assist with the ongoing **monitoring** of the effectiveness of TOPAs (also attached). As the Commission deemed TOPAs as an effective tool in minimizing player harm, rather than **monitoring** the effectiveness of TOPAs moving forward, the VCGLR will look to implement ongoing reporting requirements, similar to those in place in relation to section 72 self-exclusions. This will ensure the VCGLR has visibility to the extent by which TOPAs are being taken up, and provide the VCGLR with a complete picture of patrons who are 'excluded' from the casino. Our primary goal will be to check that TOPAs are still not inappropriately circumventing the use of section 72(2A) self-exclusion orders.

Noting the VRGF's responses, the VCGLR will also seek Crown's view on providing the following, as suggested by you, before finalizing the ongoing reporting requirements:

1. sample of patron spend levels before and after TOPAs, in comparison to other monitored players, and
2. breakdown of the length of TOPAs.

Please note Crown is already providing exit surveys to those leaving TOPAs and any TOPA extensions.

We look forward to further engaging with you once we have the data and information in hand, and if you have any further feedback on the VCGLR's request for additional data and information regarding **monitoring** ongoing visibility of TOPAs. Could you please advise by the end of this week.

Happy to discuss.

Thanks

Rowan

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit
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From: Tony Philli [REDACTED]
Sent: Friday, 20 November 2020 4:16 PM
To: Rowan Harri [REDACTED]
Cc: Jason Cremona [REDACTED]; Steve Thurston [REDACTED];
Lindsay D S [REDACTED]; Brett S Hetherington (DJCS)
[REDACTED]
Subject: HPE CM: Re: Sixth Casino Review - recommendation 10 (TOPAs trial results) - Commercial in Confidence

Hi Rowan

am pleased to be able to supply you with the VRGF response, we thank you for the opportunity to make a contribution and apologise for taking so long.

I have attached a formal response, which we are happy to discuss further if you have questions etc.

Since it may be helpful I have also attached a version Brett added comments to and also some points Lindsay made below. I think they are incorporated within the our response but it cannot hurt for you to have them for further reference.

cheers

Tony

Lindsay's reflections

comments are:

- agree that trial should go for the full 12 months (if impacted by Covid, they will simply have to start again)
- Take up numbers are very low, and needs further analysis
- No explanation on why no extensions were made - was it offered or explained to gamblers? What were their reasons for not extending?
- High breach rate of TOPAs - did they fully understand their obligations? Is there a lack of deterrent? How many were 3 month time outs and how many 6 months?

- What is average loss figure? Over what period of time? How does it compare with Loyalty Program members - higher or lower? Why so different between the two periods?
- If all TOPAs were Loyalty Program members, what analysis has been done on their gambling before time out (eg. red flags that may/did identify "at risk")? And what analysis has been done on their gambling after time out (eg. reduce spend or no change)?

From: Rowan Harris [redacted]
Sent: Thursday, 19 November 2020 6:16 PM
To: Tony Phillips (DJCS) [redacted] >
Cc: Jason Cremona (VCGLR) [redacted] >; Steve Thurston (VCGLR) [redacted] >
Subject: FW: Sixth Casino Review - recommendation 10 (TOPAs trial results) - Commercial in Confidence

Hi Tony

Hope you are going well. Am just enquiring on the progress of the VRGF's response.

Thanks

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From: Tony Phillips (DJCS) [redacted]
Sent: Wednesday, 11 November 2020 10:01 AM
To: Rowan Harri [redacted]
Cc: Jason Cremon [redacted]; Steve Thurston [redacted] >
Subject: Re: Sixth Casino Review - recommendation 10 (TOPAs trial results) - Commercial in Confidence

Hi Rowan

my apologies, know you are still waiting for the TOPA response. Should get it to you today or tomorrow at the latest

cheers

Tony

From: Rowan Harri [redacted]
Sent: Friday, 30 October 2020 1:34 PM
To: Tony Phillips (DJCS) [redacted]
Cc: Jason Cremona (VCGLR) [redacted]; Steve Thurston (VCGLR) [redacted]
Subject: RE: Sixth Casino Review - recommendation 10 (TOPAs trial results) - Commercial in Confidence

Hi Tony

Thank you for the update. Appreciated. We understand. Towards the end of next week will be fine.

Regards

Rowan

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From: Tony Phil [REDACTED]
Sent: Friday, 30 October 2020 1:30 PM
To: Rowan Harris [REDACTED]
Subject: Re: Sixth Casino Review - recommendation 10 (TOPAs trial results) - Commercial in Confidence

Hi Rowan

we have progressed the response to the TOPAS trial. I will try and get it to you today but we have a lot of work relating to re-opening come in and it has to take priority today. If I don't get our response written up properly by the end of the day I will do it on Monday, since I am in what seems like a minority not taking the day off.

cheers

Tony

From: Rowan Harris [REDACTED] >
Sent: Thursday, 22 October 2020 7:39 PM
To: Tony Phil [REDACTED] >
Cc: Brett S Hetherington (DJCS [REDACTED]); Lindsay D Shaw (DJCS [REDACTED]); Jason Cremona (VCGLR [REDACTED]); Steve Thurston (VCGLR [REDACTED]) >;
Subject: Sixth Casino Review - recommendation 10 (TOPAs trial results) - Commercial in Confidence

Dear Tony

Hope you are all going well. I tried to call you at 5.15pm to give you a 'heads up' re this email. Sorry for not calling earlier in the day.

The VCGLR seeks the VRGF's feedback regarding results of the Crown TOPAs trial which concluded on 30 June 2020 (file is attached).

As a result of our assessment of the trial results, the VCGLR believes TOPAs have a beneficial role to play and does not consider it necessary for TOPAs to transition to self-exclusions pursuant to

section 72(2A) of the CCA. The VCGLR intends to recommend to the Commission that Crown is directed to provide ongoing visibility of TOPAs (monitoring and reporting) to enable the same oversight to TOPA's as it does to self-exclusions under s72 of the CCA until such time the data is no longer required.

We would appreciate if you could provide the VRGF's feedback by Friday 30 October 2020. Please do not hesitate to call me should you wish to discuss.

Thanks

Rowan

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