



Contact: Barry Felstead / Joshua Preston
 Direct Line: [REDACTED]
 E-mail: [REDACTED]
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29 June 2019

Ms Catherine Myers
 Chief Executive Officer
 Victorian Commission for Gambling and Liquor Regulation
 49 Elizabeth Street
 RICHMOND VIC 3121

cc: Rowan Harris

By Email

Dear Ms Myers

Sixth Review of the Casino Operator and Licence (Sixth Review) - Recommendation 14

I refer to Recommendation 14 of the Sixth Review and our response dated 2 July 2018. Recommendation 14 provides:

"The VCGLR recommends that, by 1 July 2019, Crown Melbourne develop and implement a responsible gambling strategy focusing on the minimisation of gambling related harm to persons attending the casino. The strategy should address:

- (a) *early proactive intervention initiatives*
- (b) *player data analytics*
- (c) *proactive engagement with pre-commitment*
- (d) *intervening with local players with continuous play based on shorter timeframes which are more reflective of responsible gambling*
- (e) *the role of all staff in minimising harm*
- (f) *the effective use and monitoring of exclusion orders*
- (g) *internal reporting arrangements*
- (h) *integrating responsible gambling into proposals for trialing or introduction of new products and equipment*
- (i) *performance measures to assess the performance of the RGLOs, RGSC and casino staff in relation to harm minimisation*
- (j) *the roles of the Crown Resorts Responsible Gambling Committee and the Responsible Gambling Management Committee in driving harm prevention strategies based on world's best practice*

- (k) *the objectives of the RGSC in relation to minimising harm to patrons, and*
- (l) *the responsible service of gambling as a fundamental core business consideration when making strategic decisions regarding casino operations.*

Over the past several months, Crown Melbourne's (**Crown**) Responsible Gaming team has undertaken a broad research and industry analysis to assess its programs and processes. This research and analysis provided a strong foundation on which to develop the Responsible Gaming Strategic Plan.

The Strategic Plan was developed with a wide-ranging current state analysis as the foundation for setting the direction. Multiple lenses of analysis were provided by internal workshops, operating data analysis, external best-practice and expert advisor input on a range of concepts, helping to frame the current challenges and identify the most relevant strategic priorities. Action and execution planning was developed by the Responsible Gaming Team and refined by senior management. Across all phases of the strategy development, the recommendations of the Sixth Review have been considered and incorporated in alignment with Crown's stated position and response.

The Strategic Plan has been approved by the Crown Resorts Responsible Gaming Board Committee, and is attached as **Appendix A**.

The Strategic Plan incorporates and references the responsible gambling recommendations raised by the Sixth Review, and addresses the points listed at (a) to (l) of the Recommendation as either initiatives or actions. However, in considering point (j), we note the following:

- The Crown Resorts Responsible Gaming Board Committee's Charter currently articulates the role of this Committee in driving harm minimisation.
- As detailed in the Strategic Plan, this Committee is responsible for overseeing the execution of strategies and monitoring the progress of initiatives against key outcomes for each strategic priority.
- A strategic priority in the Strategic Plan is currently listed as 'Maintain and continue to enhance our culture of governance and proactive management' and as the Strategic Plan is implemented, the role of this Committee will continue to be reviewed, with the Charter updated as required accordingly.
- The role of the Responsible Gambling Management Committee will be reviewed and considered as part of the implementation of Recommendation 16, which recommends the development of a charter for this Committee. This is included as an action in the Strategic Plan and will include a reference to harm minimisation.
- The relationship between these two committees, and other committees, is presented in the Strategic Plan.

Crown is strongly of the view that the completion of the key priorities referenced in the Strategic Plan will enhance our existing responsible gaming framework.

Please do not hesitate to contact me, or in my absence Joshua Preston, if you require any further information with respect to the above.

Yours sincerely



Barry Felstead
Chief Executive Officer – Australian Resorts

Encl



CROWN MELBOURNE
RESPONSIBLE GAMING STRATEGIC
PLAN 2018-2020



AWARENESS, ASSISTANCE, SUPPORT

Gambler's/Gambling Help 1800 858 858
Responsible/Gaming Centre 1800 801 098



Responsible Gaming

Strategic Plan 2018 – 2020

The practice of the Responsible Service of Gaming at Crown Melbourne Limited (**Crown**) has been in place since the opening of the casino in 1994. It is an integral part of our casino operations, and a core part of maintaining our social licence to operate in Victoria.

Crown established itself as a strong early leader with the conceptualisation and implementation of its Responsible Gaming Centre (**RGC**) in 2002 and the voluntary introduction of a pre-commitment scheme in 2003. Since then, Crown's Responsible Gaming Framework has continued to build and strengthen Crown's commitment to harm minimisation through practice and technology, community engagement and employee education.

Crown's commitment is to the continual improvement of its responsible gaming practices and will continue to evolve its thinking and practices, continually basing its decisions on a sound foundation of evidence and global best-practice. This strategy sets out Crown's Vision to meet this commitment for the coming years.

1.0 Vision

Crown Resorts will be an industry leader in delivering the gaming experience in a responsible environment.

2.0 Current State

2.1 Overview of the Team

The Responsible Gaming Department's focus is on providing services and programs to individuals who may experience gambling harm. The Responsible Gaming Department works closely with other Crown departments, organisations and stakeholders across Victoria, to provide free and confidential services.

The Responsible Gaming Department at Crown is an integral component of customer, business and governance areas of the business.

Responsible Gaming Governance Structure



Responsible Gaming Team Structure



Led by the Group General Manager Responsible Gaming, the multidisciplinary responsible gaming team applies the Responsible Gaming Framework in a range of different ways:

- **Responsible Gaming Psychologists:** applying a clinical perspective, employee training, customer facing assistance, support, counselling and referral and responsible gaming employee supervision and support.
- **Responsible Gaming Advisors:** responsible for customer-facing assistance, support and referral, employee information and record keeping.
- **Chaplaincy Support Service:** provision of support, assistance, referral and counselling for customers and employees as part of the Employee Assistance Program.

Members of the team and governance committees have important external linkages to a range of stakeholders including:

- Victorian Responsible Gambling Foundation;
- Victorian Commission for Gambling and Liquor Regulation;
- Victorian Department of Justice and Community Safety;
- Australasian Gaming Council;
- National Association for Gambling Studies;
- Responsible Gambling Ministerial Advisory Council and Working Groups; and
- Support Services/Counselling Providers such as Gambler's Help and Peer Connection Programs.

As needed, Crown will seek advices from relevant experts to support strategic decision making with respect to the responsible service of gaming.

The Responsible Gaming Department operating model is based on the following three pillars:



2.2 Current Performance

The below charts illustrate some of the key data areas in relation to self exclusion and RGC contacts in the past five calendar years. This information was included in the Sixth Review of the Casino Operator and Licence (s 25 Review), and all data for the 2018 calendar years has been derived using the same inputs as used for the data for the s 25 Review.

CHART 2.2.1 Self Exclusions (note that Breach Detection uses the RH scale)

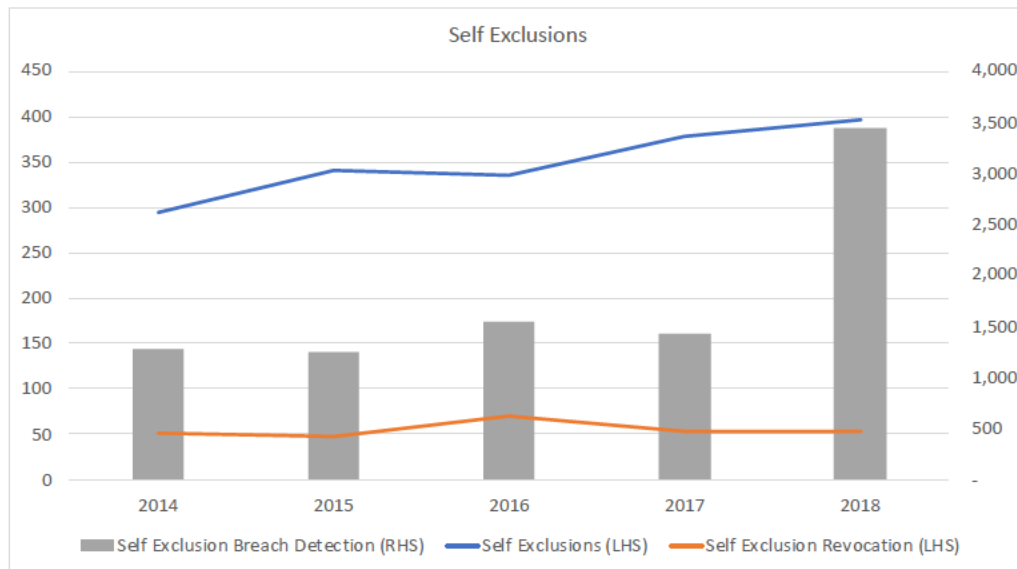


CHART 2.2.2 RGC Contacts (note that Total uses RH scale)

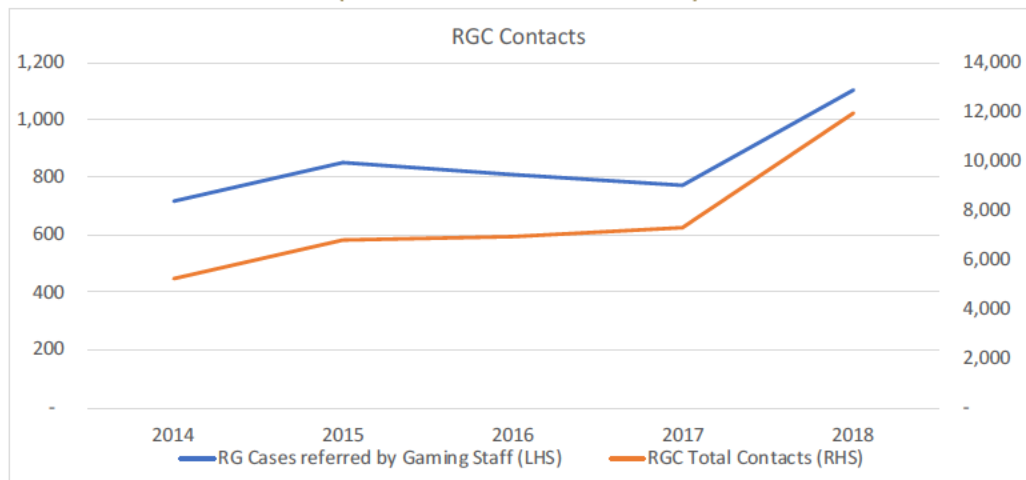


CHART 2.2.3 Weekly Average of RG Signs

The upward trends seen across all metrics in recent years can be attributed to the combined impact of a range of initiatives, including Facial Recognition Technology, more reliable Play Period monitoring and ongoing engagement and training of floor staff to encourage reporting of behaviours.

2.3 External Context

In the global land based casino industry, the concept of a Responsible Gaming Framework to deliver gaming product with a view to harm minimisation has been developing in two main areas – technology and data, and formalised programs.

Technology and Data

The most recent harm minimisation measures to gather more interest from operators and researchers are in technology. These include Facial Recognition Technology – to detect a self excluded person; and time and/or predictive modelling, where loyalty program data is used to monitor time on product and via predetermined inputs, predictive modelling to ascertain potential problematic gambling behaviours.

In terms of player analytics where time and/or predictive modelling in overseas land based jurisdictions are employed, the following is evident:

Jurisdiction	Time (not observable only)	Predictive modelling analytics
UK	Evident in some casinos	Currently being trialled in some casinos
Scandinavia	Visit frequency and time	Not in place
Central Europe (i.e. Holland, Switzerland, Austria)	Visit frequency and time	Not in place
Macau	Not in place	Not in place
Singapore	Visit frequency	Not in place
Canada	Evident in some casinos	Not in place
New Zealand - Auckland and Christchurch	In place	In place

The above table is reflective of the challenges involved with the effective and reliable use of player data analytics. Accordingly, external advices will be sought and relied upon throughout Crown's assessment of player data analytic options (for both carded and uncarded).

Formalised Programs

In South East Asia, Macau operators are investing more heavily in responsible gaming measures, with operators including responsible gaming as part of its Corporate Social Responsibility structures, and operationally, reviewing Facial Recognition Technology. Singaporean operators must observe strict laws in terms of entry, exclusion and interaction with relevant government bodies.

A review has established that there are no RGCs, or equivalents, in Europe or South East Asia.

In Canada and the USA, a number of jurisdictions over the years have introduced a model not dissimilar to the Crown context, in that a focal point for delivering responsible gaming services and programs is delivered by specially trained staff, supported by employee training and links to support services. An example of this is 'GameSense', which is a program developed by the British Columbia Lottery Corporation and usually takes the form of information pods, staffed by government employees who can provide game information, assistance, support and referral and deliver the self exclusion program. This concept was recently adopted by MGM in the USA. In Ontario, Canada, the Responsible Gambling Council has established RGCs in casinos, offering some of the same services as is offered by those at Crown Resorts.

The larger New Zealand based casinos, SkyCity Auckland and Christchurch casinos include as part of their responsible gaming framework specially trained and dedicated staff, similar to the role of a Responsible Gaming Advisor.

In Australia, both Crown Melbourne and Crown Perth have had for many years a framework of self exclusion programs, dedicated staff, 24/7 operation to assist customers and a dedicated RGC. Other Australian casinos are not as developed as Crown's, with The Star in Sydney only recently introducing a dedicated Responsible Gaming Resource Centre, however this is not staffed 24/7.

The Australian Landscape – Technology, Data and Formalised Programs

The table below summarises the prevalence of some key harm minimisation measures across Australian casinos.

Casino	Self Exclusion	RGC	Dedicated Staff	Third Party Exclusion	Facial Recognition Technology	Time (not observable only)	Predictive Modelling Analytics
Crown Melbourne	Yes	Yes	Yes (including Psychologists)	By July 2019	Yes	Yes	Trialling
Crown Perth	Yes	Yes	Yes	Yes	Currently Trialling	Yes	No
The Star Sydney	Yes	Yes (not 24/7)	Not 24/7	Yes	Yes, recently installed	Yes	No
The Star Qld	Yes	No	Not 24/7	Yes	No	Yes	No
SkyCity Adelaide	Yes	No	Yes	Yes		Yes	No
Federal Group Tasmania	Yes	No	Not 24/7	Yes	No	Yes	No
NT	Yes	No	No	Yes		Yes	No
ACT	Yes	No	No	No	No	Unsure	Unsure
KEY	Fully implemented	Partial implementation or trialling	Not implemented				

Key Principles in Delivering Responsible Gaming Services

Crown's Responsible Gaming Framework balances responsible practices, harm minimisation, regulatory and policy requirements along with an internal perspective based on regular review and incorporation of relevant global benchmarks.

Two key benchmarks that have helped to inform the key principles of our framework are the Canada-based Responsible Gambling Council (**Council**)'s 'RG Check' accreditation framework, and

the 'Reno Model'.¹ The Reno Model is a position paper, developed in 2004 by Alex Blaszczynski, Robert Ladouceur and Howard J. Shaffer, for key stakeholders, which presents some guiding principles for a number of stakeholders, including operators, to action in order to limit gambling related harm.

The relevant areas of each model are shown in the diagram below.



¹ 'A Science-Based Framework for Responsible Gambling: The Reno Model' Alex Blaszczynski, Robert Ladouceur, Howard J. Shaffer; *Journal of Gambling Studies*, Vol. 20, No. 3, Fall 2004

2.4 SWOT Analysis

The SWOT analysis below was developed by consolidating a wide range of inputs, including:

- The findings and recommendations of the s25 Review;
- Internal workshops and executive review; and
- Consultation with external advisors.

Strengths	Weaknesses
<ul style="list-style-type: none"> ➤ Longstanding, robust responsible gaming framework with developments throughout Crown's history ➤ Recognition in the s25 Review in relation to progress made since the last Review, focus on increasing flexibility (time out, remote self exclusion, joint self exclusion) ➤ Acknowledgement in the s25 Review of the work of the RGC; the VIP/RG meetings; Code of Conduct compliance ➤ Crown Resorts Responsible Gaming Committee ➤ RGC and the services and programs, and as the focal point for responsible gaming ➤ The referral model ➤ Core and stable multi-disciplinary team ➤ Employee training and information programs in relation to responsible gaming ➤ Crown's long-standing commitment to responsible gaming, including from Board down to senior management representation on the Executive and Business Operational teams – part of the operational and strategic DNA ➤ RG is well entrenched within the structure 	<ul style="list-style-type: none"> ➤ s25 Review noting an observation of operational shortfalls in areas including: <ul style="list-style-type: none"> ▪ Resourcing and data analysis ▪ Not enough responsible gaming program and service evaluation ▪ Non-participation in research ▪ Lack of clearly articulated strategy ▪ Cross property policy weaknesses ▪ No external review of responsible gaming ▪ Customer awareness of responsible gaming programs and services ▪ Perceived lack of recent proactivity in objectively evaluating the responsible gaming framework – there are strong elements, but there is also a range of enhancements that are yet to be engaged with

Opportunities	Threats
<ul style="list-style-type: none"> ➤ External advisors to guide innovation and evolution of the responsible gaming framework ➤ Properly defined responsible gaming strategy ➤ Leveraging existing and evolving technology and greater use of dedicated Crown IT team ➤ Technology benefits ➤ Responsible gaming data collection, analysis and reporting ➤ Responsible gaming's relationship with broader governance frameworks being implemented in Crown Melbourne 	<ul style="list-style-type: none"> ➤ Changes in community behaviour and preferences ➤ Failure to properly implement Strategic Plan ➤ Changes in regulatory and governance expectations and policy framework ➤ Adequacy of resourcing to support an enhanced framework ➤ Loss of key experienced staff

2.5 Summary of Key Enhancement Opportunities

After considering the SWOT analysis, it is clear that there are several core opportunities for improvement and enhancement that our Strategy must address:

- Externally, working with increasing expectations from the community, regulator and government in terms of our role in Responsible Gaming.
- Internally, continuing to embed awareness and operational inclusion of our Responsible Gaming Framework with staff across Crown Melbourne, both operationally and strategically through management and governance frameworks.
- Continuing to objectively and proactively evaluate our Framework with a view to ongoing improvement, with innovation informed by a strong evidence base.
- Working within and through our existing technology limitations to better leverage existing data and create new insights through different analytical models.

3 Our Strategic Priorities

Based on our key enhancement opportunities, we have identified four strategic priorities which will guide our activity and focus over the next three years:

- 1 Enhance our existing externally-facing services, initiatives and communications through benchmarking against best practice;
- 2 Continue to build and sustain cultural awareness and internal capability for Responsible Gaming;
- 3 Create a relevant, accurate, embedded and effective information ecosystem that supports our overall objectives; and
- 4 Maintain and continue to enhance our culture of governance and proactive management.

It is important to note that the s 25 Review recommendations are addressed through these four priorities – for a more detailed mapping refer to Section 5.

4 Executing Against our Strategic Priorities

This section outlines the key initiatives that have either already been progressed or will be undertaken to address each of our strategic priorities. *For more detailed action plans, please refer to Appendix A.*

Priority 1: Enhance existing externally-facing services, initiatives and communications through benchmarking against best practice

Desired Outcome

Our Responsible Gaming (RG) Framework to be consistently seen as a leader in delivery of RG services and programs that are effective and well-communicated to their target audiences.

Key Initiatives

- 1.1 Conduct a detailed benchmarking review of key local, national and international RG programs and services.
- 1.2 Design and implement an evaluation and monitoring program of Crown's RG services and programs.
- 1.3 Rebrand or refresh logo/look and feel of RG brand.
- 1.4 Review and update responsible gaming customer communications.
- 1.5 Promote the availability of the Play Safe Program and the Your Play Scheme.
- 1.6 Monitor and consider the developments of technology based harm minimisation resources.

Priority 2: Continue to build and sustain cultural awareness and internal capability for Responsible Gaming

Desired Outcome

A culture where RG is fully embedded into culture, process, strategic and operational decisions, thereby maintaining our social licence to operate in a responsible manner.

Key Initiatives

- 2.1 Appropriately resource the RG team by increasing FTEs and review the RG department Position Descriptions and Performance Evaluation Plans.
- 2.2 Continuing to support the resources and team and recognise their specialist and critical role in the organisation through support, development, training and succession opportunities.
- 2.3 Strong and robust training programs – including collaboration with external advisors.
- 2.4 Develop annual internal communications strategy to embed into the operational dynamic, including calendar of initiatives and leader-led change.

Priority 3: Create a relevant, accurate, embedded and effective information ecosystem that supports our overall objectives

Desired Outcome

There are two key elements to our desired outcome. Firstly, data analytics that are working effectively and aligned to our overall objectives in terms of relevance, accuracy and integration into our forward thinking. Second, our internal reporting data is robust, well understood, accurately recorded and intelligently applied.

Key Initiatives

- 3.1 The Crown Model for historical and real-time analysis.
- 3.2 Design, test, implement and evaluate the Play Period reporting.
- 3.3 Scope current availability of commercially available products and conduct a literature review on the efficacy of Play Period Data Analytics for un-carded play.
- 3.4 Develop reports and dashboards to inform the RG department for operational analysis and to update the Crown Resorts Responsible Gaming Board Committee.

Priority 4: Maintain and continue to enhance our culture of governance and proactive management

Desired Outcome

RG's place at the core of structure, process, strategy and values across the Group (and in particular in Melbourne) is maintained and enhanced.

Key Initiatives

- 4.1 Review of information into the Crown Resorts Responsible Gaming Board Committee.
- 4.2 Review of structure to ensure RG remains front of mind and embedded in Crown's culture.
- 4.3 Continual application of governance related frameworks to responsible gaming such as compliance and risk.

Managing and reporting on progress

The Crown Resorts Limited Responsible Gaming Committee will be responsible for overseeing the execution of the strategy and monitoring progress of the initiatives against key outcomes for each priority.

Throughout the execution of the Strategy, external advices from relevant experts will be sought where necessary to ensure the priorities, outcomes and initiatives remain relevant.

The Strategy execution progress and outcomes will be a standing agenda item for all meetings of the Committee, with formal reporting provided by the Group General Manager Responsible Gaming.

5 Addressing the s25 Review – Initiatives to Recommendations Matrix

The table below shows how each of the initiatives is aligned to the specific recommendations of the s25 Review.

		s25 Review Recommendations by Number											
		6 - Review allocation of staffing	7 - Observable signs - data analytics	8 - Data analytics tools incorporating historical and real time data	9 - Independent assessment of real-time tool	10 - Review of voluntary exclusion policy	11 - Involuntary exclusion policy	13 - Brand refresh	14 - Responsible Gambling strategy	15 - Regular reporting on strategy	16 - Responsible Gambling Committee Charter		
Strategic Priority	Initiatives												
1. Enhance our existing externally facing services, initiatives and communications	1.1 Conduct a benchmarking review of key local, national and international RG programs and services												
	1.2 Design and implement an evaluation and monitoring program of Crown's RG services and programs												
	1.3 Rebrand or refresh logo/look and feel of RSG brand												
	1.4 Review and update responsible gambling customer communications												
	1.5 Promote the availability of the Play Safe Program and Your Play Scheme												
	1.6 Monitor and consider the developments of technology based harm minimisation resources												
2. Continue to build and sustain cultural awareness and internal capability for Responsible Gambling	2.1 Appropriately resource the RG team by increasing FTEs and review the RG department PDs and PEPs												
	2.2 Continuing to support the resources and team and recognise their specialist and critical role in the organisation through support, development, training and succession opportunities												
	2.3 Strong and robust training programs - including review by external advisors												
	2.4 Develop annual internal communications strategy to embed into the operational dynamic, including calendar of initiatives and leader-led change												
3. Create a relevant, accurate, embedded and effective information ecosystem that supports our overall objectives	3.1 Crown model for historical and real-time analysis												
	3.2 Design, test, implement and evaluate the Play Period reporting												
	3.3 Scope current availability of commercially available product and conduct a literature review on the efficacy of Play Period Data Analytics for uncarded play												
	3.4 Develop reports and dashboards to inform the Responsible Gambling Department for operational analysis and to update the Crown Resorts Responsible Gaming Board Committee												
4. Maintain and continue to enhance our culture of governance and proactive management	4.1 Review of information into the Crown Board												
	4.2 Review of structure to ensure responsible gambling remains front of mind and embedded in Crown's culture												
	4.3 Continual application of governance related frameworks to responsible gambling such as compliance and risk												



CROWN

APPENDIX A

Priority 1: Enhance our existing externally-facing services, initiatives and communications

Desired Outcome

For our RG Framework to be consistently seen as a leader in delivery of RG services and programs that are effective and well-communicated to their target audiences.

Key Initiatives

- 1.1 Conduct a benchmarking review of key local, national and international RG programs and services.
- 1.2 Design and implement an evaluation and monitoring program of Crown's RG services and programs.
- 1.3 Rebrand or refresh logo/look and feel of RG brand.
- 1.4 Review and update responsible gaming customer communications.
- 1.5 Promote the availability of the Play Safe Program and the Your Play Scheme.
- 1.6 Monitor and consider the developments of technology based harm minimisation resources.

DETAILED ACTIONS

Priority	Initiative	Action	Owner	Timing
1	1.1	1.1.1 Identify relevant Australasian casinos to benchmark RG services and commence work	SB	Q1F19
		1.1.2 Finalise report	MO	Q4F19
		1.1.3 Identify relevant international casinos to benchmark and commence work	SB	Q4F19
		1.1.4 Finalise report	MO	Q4F19
		1.1.5 Analyse benchmarking reports for services and programs that may suit the Crown environment to improve harm minimisation practices – including self exclusion and third party exclusion programs	CMRG and CPRG	Q1F20
	1.2	1.2.1 Commence work on RG program and service framework mapping (current)	TO	Q2F19

Priority	Initiative	Action	Owner	Timing
		1.2.2 Engage with and seek input from VCGLR, VRGF, independent experts and other stakeholders into program changes	SB	Q2 F19 to Q4F19
		1.2.3 Based on findings of the benchmarking report analysis, add relevant service and program updates to the framework	CMRG and CPRG	Q2F20
		1.2.4 Develop monitoring and evaluation framework	TO and MO	Q4F19
		1.2.5 Finalise the combined framework for implementation	CMRG	Q1F20
		1.2.6 Implement updated framework	CMRG and CPRG	Q1F20
	1.3	1.3.1 Collating an inventory of existing responsible gaming and casino related brochures, and other marketing collateral which include a responsible gaming logo and messaging	CM and CP and marketing	Q3F19
		1.3.2 Settle logo and style guide	CM and CP and marketing	Q3F19
		1.3.3 Commence use of new logo and style guide for responsible gaming materials and brochures, the Crown website, the Crown App; when inventory levels are low for other brochures containing the logo, replace with the new branding	CM and marketing	Q1F20
	1.4	1.4.1 Compile a listing of all customer information materials, including responsible gaming/gambling terminology (inclusive of staff titles and centre nomenclature). Review and update customer information – review content after framework implemented	CMRG	Q1F19
		1.4.2 Soft launch staff title and RGC name update	CMRG	Q4F19
		1.4.3 Review and update collateral to incorporate new RG logo and program changes- liaise with Studio/Marketing; print new collateral as inventory runs low; monitor progress of replacement of collateral	CMRG and Marketing	Q4F19

Priority	Initiative	Action	Owner	Timing
		1.4.5 Launch new look and feel and customer content	CMRG and Marketing	Q1F20
		1.4.6 Evaluation	CMRG and Marketing	Q2F21
	1.5	1.5.1 Review existing promotion of Play Safe Program and Your Play Scheme availability and implement updates	CMRG	Q1F19
		1.5.2 Review program/scheme promotion in line with Research report	CMRG	Q1F20
		1.5.3 Implement relevant updates	CMRG	Q1F20
		1.5.4 Evaluation	CMRG	Q1F21
	1.6	1.6.1 Refer to Strategic Priority 3		

Priority 2: Continue to build and sustain cultural awareness and internal capability for Responsible Gaming

Desired Outcome

A culture where RG is fully embedded into culture, process, strategic and operational decisions, thereby maintaining our social licence to operate in a responsible manner.

Key Initiatives

- 2.1 Appropriately resource the RG team by increasing FTEs and review the RG department Position Descriptions (**PDs**) and Performance Evaluation Plans (**PEPs**).
- 2.2 Continuing to support the resources and team and recognise their specialist and critical role in the organisation through support, development, training and succession opportunities.
- 2.3 Strong and robust training programs – including review by external advisors.
- 2.4 Develop annual internal communications strategy to embed into the operational dynamic, including calendar of initiatives and leader-led change.

DETAILED ACTIONS

Priority	Initiative	Action	Owner	Timing
2	2.1	2.1.1 Resource increase commenced May 2018, finalise additional resources	CMRG and HR	Q2F19
		2.1.2 Review and implement updated PDs and PEPs	CMRG and HR	Q4F19
		2.1.4 Establish a gaming staff PD and PEP update in relation to harm minimisation working group (RG and HR)	SB, SM and HR	Q3F19
		2.1.5 Finalise and implement updates to gaming staff PDs and PEPs	SB, SM and HR	Q4F19
	2.2	2.2.1 Establish an RG employee training working group	CMRG and Crown College	Q1F20

Priority	Initiative	Action	Owner	Timing
		2.2.2 Develop a training gap analysis	CMRG and Crown College	Q1F20
		2.2.3 Identify a training plan	CMRG and Crown College	Q1F20
		2.2.4 Develop training sessions including internal and external advices	CMRG and Crown College	Q2F20
		2.2.5 Commence sessions	CMRG and Crown College	Q3F20
	2.3	2.3.1 Commence review of RG training and information sessions	CMRG and CC	Q4F19
		2.3.2 Commence review of VCGLR approved RSG training with VCGLR and VRGF	CMRG	Q4F19
		2.3.3 Update and implement interim training and information session material following new look and feel update	CMRG	Q1F20
		2.3.4 Instigate review by External Advisors	CMRG	Q1F20
		2.3.4 Update training and information session material following finalisation of VCGLR approved RSG training	CMRG and CC	Q2F20
		2.3.5 Build and test VCGLR approved RSG training	CMRG and CC	Q2F20
		2.3.6 Implement VCGLR approved RSG training	CMRG and CC	Q3F20
		2.3.7 Evaluation of all updated materials	CMRG and CC	Q3F21
	2.4	2.4.1 Establish an RG employee communications working group to establish effective comms methods using various comms channels	CMRG and Emp Comms	Q4F19
		2.4.2 Set employee comms strategy	CMRG and Emp Comms	Q1F20
		2.4.2 Develop and implement relevant comms and set frequency	CMRG	Q1F20
		2.4.3 Evaluate updated comms	CMRG	Q1F21

Priority 3: Create a relevant, accurate, embedded and effective information ecosystem that supports our overall objectives

Desired Outcome

There are two key elements to our desired outcome. Firstly, data analytics that are working effectively and aligned to our overall objectives in terms of relevance, accuracy and integration into our forward thinking. Second, our internal reporting data is robust, well understood, accurately recorded and intelligently applied.

Key Initiatives

- 3.1 Crown Model for historical and real-time analysis.
- 3.2 Design, test, implement and evaluate the Play Period reporting.
- 3.3 Scope current availability of commercially available product and conduct a literature review on the efficacy of Play Period Data Analytics for un-carded play.
- 3.4 Develop reports and dashboards to inform the Responsible Gaming Department for operational analysis and to update the Crown Resorts Responsible Gaming Board Committee.

DETAILED ACTIONS

Priority	Initiative	Action	Owner	Timing
3	3.1	3.1.1 Commence trial of the Crown Model	SB LP KH	Q4F18
		3.1.2 Prepare six month review	SB LP KH	Q3F19
		3.1.3 Conclude 12 month trial and seek external advice as to operation and methodology	SB LP KH	Q1F20
		3.1.4 Prepare 12 month review along with external recommendation	SB KH	Q1F20
		3.1.5 Senior Management (and Board Committee) to review ongoing efficacy	CR CM	Q2F20

Priority	Initiative	Action	Owner	Timing
	3.2	3.2.1 Establish a Play Periods – carded specifications working group	SB	Q1F19
		3.2.2 Review current data sources and establish parameters	CMRG	Q1F19
		3.2.3 Commence work with IT and RG working groups	IT and CMRG	Q1F19
		3.2.4 Commence operational trial	IT and CMRG	Q1F19
		3.2.5 Socialise product and operational trial details with senior management	IT and RG	Q2F19
		3.2.6 Commence operational trial for CP	IT and CPRG	Q3F19
		3.2.7 Commence work on phone based alerts	IT and CMRG	Q3F19
		3.2.8 Prepare initial review document and evaluation parameters	IT and CMRG	Q1F20
		3.2.9 Finalise implementation decision	Senior mgmt.	Q2F20
		3.2.10 External Independent Review conducted	IT and CMRG	Q2F21
	3.3	3.3.1 Establish a Play Periods – uncarded specifications working group	SB	Q2F19
		3.3.2 Commence study of practical options and availability of research and commercial availability of tools <ul style="list-style-type: none"> • Commencing a literature review in relation to existing systems in place and the evidence in relation to harm reduction • Engaging with Focal Research, who are developing this functionality for gaming machines, to understand the triggers and efficacy • Contemplating system parameters to be considered for the Crown Melbourne environment • Reviewing existing system capability and technical and methodological matters 	CMRG	Q3F19
		3.3.3 Review capability of Play Periods – carded system as a basis for uncarded	IT and CMRG	Q3F19
		3.3.4 Finalise literature and external product review	CMRG	Q1F20
		3.3.5 Dependent on 3.3.3, commence operational trial	IT and CMRG	Q1F20

Priority	Initiative	Action	Owner	Timing
		3.3.6 Dependent on 3.3.5, commence operational trial for CP	IT and CPRG	Q2F20
		3.3.7 Prepare initial review document and evaluation parameters	IT and CMRG	Q2F20
		3.3.8 Finalise implementation decision	Senior mgmt.	Q2F20
	3.4	3.4.1 Determine RG Board Committee reports and inputs	CMRG	Q4F18
		3.4.2 Commence report development	CMRG	Q1F19
		3.4.3 First drafts	CMRG	Q2F19
		3.4.4 Final drafts for review by the RG Board Committee	CMRG	Q4F19/Q1F20

Priority 4: Maintain and continue to enhance our culture of governance and proactive management

Desired Outcome

Responsible Gaming's place at the core of structure, process, strategy and values across the Group (and in particular in Melbourne) is maintained and enhanced.

Key Initiatives

- 4.1 Review of form and nature of information into the Crown Resorts Responsible Gaming Board Committee.
- 4.2 Review of structure to ensure Responsible Gaming remains front of mind and embedded in Crown's culture.
- 4.3 Continual application of governance related frameworks to responsible gaming such as compliance and risk.

DETAILED ACTIONS

Priority	Initiative	Action	Owner	Timing
4	4.1	4.1.1 Analyse existing data for input into RG Board Committee reporting	CMRG	Q3F19
		4.1.2 Define target reporting outcomes	CMRG	Q3F19
		4.1.3 Identify data gaps	CMRG	Q3F19
		4.1.4 Assess process for gathering missing data	CMRG	ongoing
		4.1.5 Prepare draft for review and discussion by the RG Board Committee	CMRG	Q3F19 and ongoing
		4.1.6 Implement reporting	CMRG	Q4F19
	4.2	4.2.1 Review existing RG Function Structure and RG Management Committee Charter	CMRG	Q1F19
		4.2.2 Align existing structure with strategic objectives	CMRG	Q3F19

Priority	Initiative	Action	Owner	Timing
		4.2.3 Assess the contact points of RG across key areas of the business	CMRG	Q1F20
		4.2.4 Identify additional opportunities for operational engagement by RG	CMRG	Q1F20
		4.2.5 Make necessary adjustments to ensure effective delivery of strategic objectives	CMRG	Q2F20
	4.3	4.3.1 Review the effectiveness of the RG Board Committee and RGMC structure	CMRG	Q1F20
		4.3.2 Review the effectiveness of reporting and management escalation systems	CMRG	Q2F20
		4.3.3 Engage with Risk and Compliance departments to identify opportunities for leverage between respective frameworks	CMRG	Q2F20
		4.3.4 Identify key operational and strategic gaming processes and assess level of embeddedness of RG practices	CMRG	Q2F20
		4.3.5 Settle with senior management and ensure continuous monitoring of effectiveness	CMRG	Q3F20