

5.2: Provision of further information from Crown Casino regarding recommendation 5



Recommendation 5 of the Fifth Casino Review

TRIM ID: DB/16/36

Recommendation

1. That the Commission:
 - (a) notes Crown's response to the Commission's request for further information in relation to Recommendation 5 (the Recommendation) of the Fifth Review of the Casino Operator ("Fifth Casino Review")
 - (b) determines that Recommendation 5 of the Fifth Casino Review is complete
 - (c) notes that Crown is required to update the Commission with regard to its proposed response to question 9b in the letter to Crown dated 1 June 2016 (**Attachment 7**)
 - (d) notes that a standing agenda item will be included at the Licence Management Meetings between Crown and the VCGLR to allow for ongoing discussion in relation to tools which may assist in the identification of problem gamblers, including consideration of the response to question 9b and options to increase capacity to use observable signs to detect problem gamblers.

Background

2. The report of the Fifth Casino Review was provided to the then Minister for Liquor and Gaming Regulation, Mr Edward O'Donohue MLC on 1 July 2013. The report contained 10 recommendations for Crown to improve its operations in a number of key areas.
3. Of the ten recommendations in the Fifth Casino Review report, there is only one recommendation that the Commission has not deemed complete. This is Recommendation 5 that states the following:

"To assess the effectiveness of the use of player data in relation to intensity, duration and frequency of play as a tool to assist in identifying potential problem gamblers, the VCGLR recommends that:

 - *Within 18 months, Crown Melbourne Limited trial for a reasonable period the use of player data analysis as an initial indicator to identify players who may be having problems with their gambling;*
 - *The Crown Melbourne Limited Board and Crown Limited's Responsible Gaming Committee consider the effectiveness of the trial; and*
 - *Crown Melbourne Limited provide a copy of the report on the outcome of the trial to the VCGLR within 3 months of the report being considered by Crown Limited's Responsible Gaming Committee and the Crown Melbourne Limited Board."*
4. On 25 February 2016, the Commission considered a paper in relation to Crown's implementation of Recommendation 5, including a report of the trial conducted by Crown (**Attachment 1**).
5. At the above meeting, the Commission queried aspects of the trial report and requested a presentation from Crown in relation to the report (see extract from the Commission minutes at **Attachment 2**).
6. Prior to Crown providing its presentation, Crown was advised of the matters that the Commission would like to explore as part of Crown's presentation (**Attachment 3**).

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7. Crown's presentation took place on 28 April 2016. A copy of that presentation is provided at **(Attachments 4 and 5)**.
8. During the presentation, the Commission sought further information from Crown (see extract from the Commission minutes at **Attachment 6**). This was further clarified in correspondence sent to Crown on 1 June 2016 (**Attachment 7**).
9. The questions were:
- (a) whether any conclusions could be drawn by analysing data concerning the 348 individuals not contacted by Crown
 - (b) in relation to the 102 patrons who excluded themselves in the relevant period, whether analysis could occur from that data set to determine whether there are any common parameters/flags existing, and
 - (c) whether further sensitivity analysis could occur, for example concerning the impact of increasing or decreasing the existing parameters/flags by 10% on the number of customers identified.

Comments

10. On 22 June 2016, Crown provided a response (**Attachment 8**). In summary, Crown's response was as follows:
- In relation to question 9(a) above, Crown is of the opinion that the data alone would be insufficient to draw any further conclusions without customer contact. Crown stated that operational and privacy issues prevented this contact at the relevant time.
 - In relation to question 9(b), Crown agreed that review of the data in relation to the 102 excluded patrons would be beneficial and proposes to review this data to determine whether any meaningful or common themes can be identified. Crown will consider this internally and will update the Commission.
 - In relation to question 9(c), Crown advised that it had conducted sensitivity analysis in relation to the defined parameters, which it applied against the latest player data. The results concluded that *"increasing the sensitivity by +10% resulted in a 15% decrease of individuals; whereas decreasing the sensitivity by -10% resulted in a 2% increase of individuals"*.
11. Given Crown has provided additional information it is recommended that Recommendation 5 be determined complete noting that a standing agenda item be included at the Licence Management Meetings between Crown and the VCGLR to allow for ongoing discussion in relation to tools which may assist in the identification of problem gamblers, including consideration of the response to question 9(b).
12. Consideration has been given to asking Crown to consider options to increase its capacity to use observable signs to detect problem gambling, such as by increasing the number of Responsible Gambling Liaison Officers (RGLOs) engaged by Crown. Whilst discussions can continue in this regard, the following is observed:
- On 3 September 2014, the *Casino and Gambling Legislation Amendment Bill 2014* was introduced to Parliament. Among other things, the purpose of the Bill was to extend the Melbourne Casino Licence until 18 November 2050, and ratify the Tenth Deed of Variation to the Management Agreement for the Melbourne Casino.

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- In order to secure support for the Bill by the then Opposition Victorian Labor Party, Crown agreed to increasing resources for its 24/7 Responsible Gaming Support Centre by an additional two RGLOs (a 40% increase) and one additional Responsible Gaming Psychologist (a 50% increase) (see **Attachment 9** for a copy of a letter dated 16 September 2014 by the then Shadow Treasurer).
- In a letter dated 13 October 2014 by Crown to the VCGLR, Crown advised that it had increased its responsible gambling resources in accordance with its commitment to the Victorian Labor Party (see **Attachment 10** for a copy of a letter).
- On 21 October 2014, the Bill received Royal Assent.
- Should the VCGLR ask Crown to consider an increase to its Responsible Gaming Support Centre resources, it may submit that less than two years ago this took place, that its current resources was deemed appropriate by Parliament, and that the gaming environment has not markedly changed since then to warrant a further increase.

Recommended:

ALEX FITZPATRICK
DIRECTOR LICENSING

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5.2.1: Attachment 1



20 November 2015

Attachment 1

By email: [REDACTED]

Mr Rowan Harris
 Victorian Commission for Gambling and Liquor Regulation
 Level 3, 49 Elizabeth Street, North Melbourne VIC 3121

Dear Rowan

Section 25 Review – Recommendation 5 Report

Recommendation 5 of the Section 25 Review stated:

To assess the effectiveness of the use of player data in relation to intensity, duration and frequency of play as a tool to assist in identifying problem gamblers, the VCGLR recommends that:

- *Within 18 months, Crown Melbourne Limited trial for a reasonable period the use of player data analysis as an initial indicator to identify players who may be having problems with their gambling; and*
- *The Crown Melbourne Limited Board and Crown Limited's Responsible Gaming Committee consider the effectiveness of the trial; and*
- *Crown Melbourne Limited provides a copy of the report on the outcome of the trial to the VCGLR within 3 months of the report being considered by the Responsible Gaming Committee and the Crown Melbourne Limited Board.*

In accordance with Recommendation 5, Crown Melbourne Limited has now completed the trial and the report on the trial has been considered and endorsed by the Crown Melbourne Limited Board and the Crown Resorts Limited Responsible Gaming Committee.

A copy of that report and copies of the following are attached:

- Written Circular Resolution of the directors of the Crown Melbourne Limited Board dated 4 November 2015; and
- Minutes of the meeting of the Crown Resorts Limited Responsible Gaming Committee dated 12 November 2015.

Crown Melbourne has now completed all Recommendations of the Section 25 Review.

Yours sincerely

[REDACTED]

Debra Tegoni
 Executive General Manager – Legal & Regulatory Services

5.2.1 Attachment 1



Crown Melbourne Limited – Responsible Gaming

September 2015

Introduction**Crown Melbourne's Commitment to the Responsible Service of Gaming**

Crown Melbourne (**Crown**) has been committed to the Responsible Service of Gaming (**RSG**) since inception. Crown has led the way in RSG initiatives, including the establishment of the Responsible Gaming Support Centre (**RGSC**) in 2002, the introduction of Crown's voluntary time and loss limit setting program (in place since 2003) and its unique array of available services comprising dedicated and specially trained staff of Responsible Gaming Liaison Officers (**RGLOs**), Responsible Gaming Psychologists and the Chaplaincy Support service.

The Responsible Gaming Support Centre:

- Offers support, assistance and referral and is available 24 hours a day, seven days a week;
- Has available RGLOs;
- Provides strategies to assist customers in managing their gambling behaviours to foster responsible gambling and prevent difficulties from arising;
- Facilitates referrals to Government funded problem gambling and financial counselling support services and welfare organisations and provides contact with, and information about, these bodies;
- Has available Responsible Gaming Psychologists experienced in the field of problem gambling to assist customers and others who may require support as a result of a person experiencing difficulty with their gambling behaviours;
- Provides information regarding self-exclusion for customers who wish to exclude themselves from the casino and manages Crown's Self-Exclusion Program;
- Is able to access and provide information in selected community languages;
- Provides a Chaplaincy Support Service for customers and staff; and
- Provides all services confidentially and free of charge.

Training for all staff in relation to responsible gaming, including observable signs that may indicate a customer may be experiencing difficulties with their gambling behaviours, commences at induction with a facilitated session. Further, staff complete the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) approved RSG Training, which is delivered as a refresher every two years for relevant staff. Staff are trained to refer customers who seek assistance or who are displaying other observable signs to RGLOs, either directly or via their manager. Further, senior managers in relevant departments, including gaming, participate in more advanced responsible gaming training.

The establishment of a Crown Resorts Board Committee dedicated to overseeing RSG at Crown Melbourne and Crown Perth; the continued development and delivery of extensive

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5.2.1 Attachment 1



Crown Melbourne Limited – Responsible Gaming

September 2015

RSG training programs for staff; the implementation of the Crown Responsible Gambling Code of Conduct and the establishment of robust internal procedures for Crown's self-exclusion arrangements, all demonstrate Crown's ongoing commitment to its customers and employees and its continued dedication to responsible gaming.

Fifth Review of the Casino Operator and Licence

On 10 July 2013 the VCGLR wrote to Crown detailing 10 recommendations made as a result of the VCGLR's Fifth Review of the Casino Operator and Licence pursuant to Section 25 of the *Casino Control Act 1991* (Vic) (s 25 Review).

Recommendation 5 of the s 25 Review provided:

To assess the effectiveness of the use of player data in relation to intensity, duration and frequency of play as a tool to assist in identifying potential problem gamblers, the VCGLR recommends that:

- *Within 18 months, Crown Melbourne Limited trial for a reasonable period the use of player data analysis as an initial indicator to identify players who may be having problems with their gambling; and*
- *The Crown Melbourne Limited Board and Crown Limited's Responsible Gaming Committee consider the effectiveness of the trial; and*
- *Crown Melbourne Limited provides a copy of the report on the outcome of the trial to the VCGLR within 3 months of the report being considered by the Responsible Gaming Committee and the Crown Melbourne Limited Board.*

Crown Trial

Crown operates a property wide loyalty program known as the Crown Signature Club. Members are able to earn points when playing gaming machines and table games (including electronic versions) and when purchasing food and beverage, hotel rooms and other goods and services from participating Crown Complex retailers and outlets. These points can subsequently be redeemed for hotel accommodation, food and beverage and other goods and services (including gaming play).

Crown has recently completed a trial using member gaming data from the Crown Signature Club. This data was assessed against certain playing characteristics/parameters that were selected based upon Australian and international research, Crown's own experience and the publicly available Sky City Auckland model. Interviews with players that had gaming play consistent with a number of these selected parameters were then sought to ascertain whether they did in fact have issues with their gambling behaviours.

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5.2.1 Attachment 1



Crown Melbourne Limited – Responsible Gaming

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Determining Effectiveness

The purpose of the trial was to provide an indication of the effectiveness of using player data in relation to intensity, duration and frequency of play as a tool to assist in identifying potential problem gamblers.

It is believed that player data may provide initial indicators of problem gambling behaviour. Therefore, to gauge effectiveness, player data that matched certain predetermined parameters was used as a prompt to seek an interview, so as to interact with players, and the information was recorded.

Limitations

Data for this trial was sourced from Crown Signature Club. Collection of member gaming data activity relies on the member using their membership card when playing. Some members may not use their card every time they play. Additionally, not all Crown customers are members of the Crown Signature Club.

Methodology

The trial period was from 9 January 2015 to 17 April 2015 and was conducted by Responsible Gaming department employees.

The data source was full Crown Signature Club members with gaming activity in the prior three month period. This represented approximately 78,000 members.

The parameters¹ (flags) used to identify players for interview and interaction were as follows:

1. Visitation frequency (five times per week up to daily) combined with levels of expenditure on gaming machines (\$500+ lost per session) over a period of time (intensity) (over one month)
2. Multiple increases or disabling of pre-commitment limits (intensity) (over three months)
3. Change in expenditure over six months (by a factor of three up or down) (intensity)

¹ These parameters have been carefully considered. Parameter 1 is drawn from the SkyCity Auckland model, Parameter 6 is an extrapolation of this. Parameter 2 is a hypothesis that a person frequently increasing or disabling limits altogether may be experiencing difficulty. Parameter 3 seeks to identify behavioural change. Parameters 4 and 5 are research based.

5.2.1: Attachment 1



Crown Melbourne Limited – Responsible Gaming

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4. Gambles for five or more hours without a break of 15 minutes or longer (duration) (one month)
5. Gambles every day of the week over a period of time (frequency) (over one month)
6. Levels of expenditure on gaming machines (\$500+ lost per session) over a period of time (intensity) (one month)
7. Levels of expenditure on table games (\$500+ lost per session) over a period of time (intensity)² (one month)

The individual members identified were approached using an existing procedure, namely, the 'Third Party Information Process'.³ In order for a member to be identified, a minimum of two of the parameters had to be met. Customer responses and interactions were recorded and usual processes followed.

Findings

In total, 1,014 customers (100%) were identified as having reached two or more flags in the trial period.

Of these customers, RGLOs were able to make personal contact on the casino floor with 666 customers (**respondents**) (66%). Operational difficulties included finding an appropriate time for the interview and maintaining customer privacy in approaching and speaking to respondents.

In general, respondents had no adverse reactions or concerns in being approached.

Of the 666 respondents contacted, 634 (95%) during the interview process maintained that they were comfortable with their level of play and they did not require any responsible gaming assistance.

Of the 666 contacted respondents, 32 (5%) indicated that they had some concerns with their gambling behaviours. During the interview with the respondents, the RGLOs undertook the usual wellbeing appraisals which they conduct when interacting with customers. These 32 respondents were provided with relevant responsible gaming information and contact details for the RGSC. They undertook to contact the RGSC if they required assistance or had

² Added after the first month of three months of data

³ **Third Party Information Process:**

The Responsible Gaming department receives information about a customer's potential problem gambling behaviour from a variety of sources. When the customer themselves is not the informant, this is deemed a Third Party report. This Third Party information comes from staff, other customers, family members, friends, other reporting data, problem gambling counsellors et al.

Responsible Gaming Liaison Officers (RGLO) will act on this information received as best as appropriate. If the customer is a Crown Signature Club member, the member identifier is placed on a pager that will alert when the customer next uses their Crown Signature Club card in a gaming device. The RGLO will then attend.

5.2.1 Attachment 1



Crown Melbourne Limited – Responsible Gaming

September 2015

further concerns with their gambling behaviours. As at 30 June 2015, one respondent (0.2%) subsequently contacted the RGSC for further information (which was provided). No other respondent has come to notice since.

Separately, during the trial period, 102 customers (across the entire Crown customer base) elected to self-exclude. Of these 102 customers, only four (4%) were among the 1,014 customers who had reached two or more flags during the trial.

Conclusion

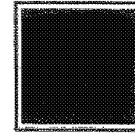
The objective of the trial was to provide an indication of the effectiveness of using player data as a tool to assist in identifying potential problem gamblers.

The project was a useful exercise to determine whether the use of player data in relation to intensity, duration and frequency of play is effective as a tool to assist in identifying potential problem gamblers. Based on the trial conducted, it appears there is only limited value in this tool.

Crown's view continues to be that the most effective means of identifying potential problem gamblers is through the detection of observable signs of problem gambling behaviour within the venue (eg. stress, aggression, etc.). Staff are trained to refer customers who seek assistance or who are displaying other observable signs to RGLOs. This allows for the personalised and individually focussed opportunity to connect with the customer and discuss their gambling behaviours.

Accordingly, Crown will continue to use player data in conjunction with observable signs when interacting with customers who may be experiencing difficulties with their gambling behaviours.

5.2.1 Attachment 1



Responsible Gaming Committee

Minutes of a Meeting of the Committee held at
Level 3, Crown Towers, 8 Whiteman Street, Southbank, Victoria on
25 September 2015 at 12.20pm

Members Present: John Horvath (Chair)
Rowena Danziger (by telephone)
Rowen Craigie

Michael Neilson (Secretary)

By Invitation: Sonja Bauer (Crown Melbourne)
Josh Preston (Crown Perth) (by telephone)
Melanie Strelein (Crown Perth) (by telephone)
Andrew Menz (Betfair/CrownBet) (by telephone)
Mary Manos (Crown Resorts Limited)

Apologies: Debra Tegoni (Crown Melbourne)

BUSINESS

Minutes of Meeting held on 10 August 2015: It was resolved that the Minutes of the Responsible Gaming Committee Meeting held on 10 August 2015 be approved.

Matters Arising: *Crown Melbourne Response to Recommendation 5 of VCGLR Section 25 Review*

The draft Report for submission to the VCGLR on the trial conducted by Crown Melbourne in response to Recommendation 5 of the VCGLR Review was presented to the Committee.

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It was noted that the VCGLR had recommended that both the Crown Melbourne Limited Board and the Committee consider the effectiveness of the trial.

Subject to approval by the Crown Melbourne Limited Board, the Committee resolved to approve the Report for delivery to the VCGLR.

Self Exclusion Revocation Procedures Comparison

The information regarding Self-exclusion, Revocation and Third Party Programs across Crown's businesses was noted.

Mr Neilson reported that Crown Melbourne and Crown Perth Responsible Gaming teams were reviewing the comparison table with a view to further aligning their programs.

The Committee suggested this needed to be a more detailed review which tested the appropriateness of those elements of each program which were different to the other businesses.

Management undertook to come back to the Committee with the results of that review.

Crown Melbourne Responsible Gaming Report:

The Crown Melbourne Responsible Gaming Report was taken as read.

Sonja Bauer spoke to the Report noting the responsible gaming initiatives which have occurred at Crown Melbourne since the last update in August 2015. In particular, the following items were noted:

- the continued delivery of updated Senior Manager refresher training;
- the implementation of the Victorian State Government's voluntary pre-commitment system – YourPlay; and
- the proposed activities for Responsible Gambling Awareness Week including a Q&A forum to be held at the Melbourne Cricket Ground.

It was noted that following implementation of YourPlay, Crown's PlaySafe program would be retired.

The attendance of Bruce Cohen and Alan Stone, Chair and General Counsel of the VCGLR, at the Responsible Gaming Support Centre was also noted.

It was resolved that the Crown Melbourne Responsible Gaming Report be noted.

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Crown Perth Responsible Gaming Report:

The Crown Perth Responsible Gaming Report was taken as read.

Melanie Strelein spoke to the Report noting the responsible gaming initiatives which had occurred at Crown Perth since the last update in August 2015.

In particular, the following items were noted:

- the summary of key issues presented to the Responsible Gambling Management Committee including the completion mental health first aid training and the potential for rolling this training out to senior employees across the business;
- the various stakeholder engagement initiatives focussing on people at risk of homelessness; and
- the involvement of Crown Perth in Responsible Gambling Awareness Week working group meetings.

It was noted that Crown Perth had engaged with the DRGL in relation to the patron feedback received noting that a number of the suggestions are already addressed in various ways by Crown Perth.

It was resolved that the Crown Perth Responsible Gaming Report be noted.

Betfair / CrownBet Responsible Gaming Report

The Betfair and CrownBet Reports were taken as read.

Betfair

Andrew Menz spoke to the Report noting the responsible gaming initiatives which have occurred at Betfair and CrownBet since the last update in August 2015. In particular, the following items were noted:

- the discussions and co-operation between Betfair and CrownBet to advance responsible gaming initiatives across both businesses;
- the participation of Betfair in Responsible Gambling Awareness Week via online and social media communications; and
- the launch of new consumer help website called "The Hub" to improve access to information on Betfair's website.

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It was also noted that it is intended that a link to the AFL's responsible gambling video be placed on the Betfair website.

The 2015/16 First Quarter Statistics were presented to the Committee, it being noted that there has been a reduction in account re-activation requests following closure as a result of self-exclusion.

CrownBet

In relation to CrownBet, the following items were noted:

- the roll out of the Responsible Gaming e-module training; and
- the participation of CrownBet in the Federal Government's review into illegal offshore wagering.

It was noted that the Northern Territory Racing Commission is due to release its Responsible Gambling Code of Practice for online sports operators which is expected to largely formalise the existing responsible gambling measures CrownBet has in place.

The Committee requested that it be provided with a copy of the Code of Practice once released.

It was **resolved that** the Betfair / CrownBet Responsible Gaming Report be noted.

Gaming Environment Scan:

The Gaming Environment Scan papers were taken as read.

The Committee noted the online focus of much of the commentary.

It was **resolved that** the Gaming Environment Scan Report be noted.

Future Meetings:*2015 Meeting Dates*

The 2015 Committee meeting dates were noted.

Closure:

There being no further business, the meeting was declared closed at 1.05pm.

Signed

Chairperson
John Horvath

5.2.1. Attachment 1

**Crown Melbourne Limited
(ACN 006 973 262)****Written Resolution of the Committee made in accordance with the Crown Resorts
Limited Constitution**

We, being all the directors of the Company at the date of this circulating resolution, entitled to receive notice of a meeting of directors and to vote on the resolutions contained in this circulating resolution, by signing this document each state that we are in favour of the resolutions set out in this document.

The resolutions are passed by the director without a directors meeting on the date and at the time when the last member signs. Separate copies of this document may be used for signing by any one or more of the directors.

Background:

On 10 July 2013 as a result of the Fifth Review of the Casino Operator and Licence pursuant to Section 25 of the Casino Control Act 1991 (Vic) (s 25 Review), the Victorian Commission for Gambling and Liquor Regulation (VCGLR) recommended that:

- Within 18 months, the Company trial for a reasonable period, the use of player data to assess the effectiveness of the use of player data as a tool to assist in identifying potential problem gamblers;
- The Board and the Crown Resorts Limited's Responsible Gaming Committee consider the effectiveness of the trial; and
- The Company provide a copy of the report on the outcome of the trial (Section 25 Review Report) to the VCGLR within 3 months of the report being considered by the Responsible Gaming Committee and the Company.

The Directors acknowledge having received a draft Section 25 Review Report and acknowledge that a copy of the report has been reviewed and approved by the Crown Resorts Limited Responsible Gaming Committee for lodgement, subject to the approval of the Company.

Resolutions:

Having reviewed the Section 25 Review Report, each director resolves to approve the Section 25 Review Report for delivery to the VCGLR accordance with Recommendation 5 of the s 25 Review.

5.2.1: Attachment 1

Signed:



Name: James D Packer

Date: 2/11/15

Signed:



Name: Rowen B Craigie

Date:

Signed:

Name: Richard Kevan Gosper

Date:

Signed:

Name: Kenneth M Barton

Date:

Signed:

Name: John H Alexander

Date:

Signed:

Name: Rowena Danziger

Date:

Signed:

Name: John S Horvath

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Name: Barry J Felstead

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Name: Rowena Danziger

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Name: John S Horvath

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Name: Barry J Felstead

Date:

5.2.1: Attachment 1

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Name: James D Packer

Date:

Signed:

Name: Rowen B Craigle

Date:

Signed:

Name: Richard Kevan Gosper

Date: 4 November 2015

Signed:

Name: Kenneth M Barton

Date:

Signed:

Name: John H Alexander

Date:

Signed:

Name: Rowena Danziger

Date:

Signed:

Name: John S Horvath

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Name: Barry J Felstead

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Name: Richard Kevan Gosper

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Name: Kenneth M Barton

Date:

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Name: John H Alexander

Date:

Signed:

Name: Rowena Danziger

Date:

Signed:

Name: John S Horvath

Date: 11/6/15

Signed:

Name: Barry J Felstead

Date:

5.2.1: Attachment 1

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Name: James D Packer

Date:

Signed:

Name: Rowen B Craigie

Date:

Signed:

Name: Richard Kevan Gosper

Date: [Redacted]

Signed: [Redacted]

Name: Kenneth M Barton

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Name: John H Alexander

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Name: Rowena Danziger

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Name: John S Horvath

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5.2.1: Attachment 1

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Name: John H Alexander

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Name: Rowena Danziger

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Name: John S Horvath

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Name: Barry J Felstead

Date: 4/11/15

5.2.1 Attachment 1

ATTACHMENT 2

4.3 Fifth Casino Review - the outcomes of outstanding recommendations 5 and 8

Members noted the receipt of reports on the outcomes of recommendations 5 and 8, being the last two outstanding items from the Fifth Casino Review.

Members discussed and queried aspects of the reports provided by Crown in particular the methodology used in the trial to assess the effectiveness of the use of player data. Members requested a presentation from Crown in relation to the report prepared in response to Recommendation 5.

5.2.3 Attachment 3



Victorian Commission for
Gambling and Liquor Regulation

49 Elizabeth Street, Richmond VIC 3121
GPO Box 1988, Melbourne VIC 3001
T: 1300 182 457
www.vcgilr.vic.gov.au

Attachment 3

11 April 2016

Our ref:
CD/16/8136CD/16/8136*

Ms Debra Tegoni
Executive General Manager
Legal & Regulatory Services
Crown Melbourne Limited
8 Whiteman Street
SOUTHBANK VIC 3006

Debra
Dear Ms Tegoni

Fifth Casino Review Recommendation 5 – Effectiveness of the use of player data analytics

I refer to Crown's upcoming presentation on their assessment of the effectiveness of the use of player data to assist in identifying problem gamblers to the Victorian Commission for Gambling and Liquor Regulation (the Commission) at its meeting on 28 April 2016.

To assist in your preparation, I have set out matters that the Commission would like to explore, noting however that issues that may be raised are not limited to the matters set out below.

Generally, they relate to the following:

- the methodology that was adopted and the research bases upon which it was founded;
- the manner in which the methodology was implemented;
- further analysis of results; and
- what you consider to be the implications of the study for future activity.

Methodology and sensitivity analysis

Potential parameters to define problem gambling will depend on a range of factors including demographics and environment. The Commission would like to understand how the parameters were chosen for this study.

- Noting the reference to the SkyCity model, what other Australian and international research was used to set the parameters (flags)? For example, what was the basis for setting the limits of :
 - \$500+ per session
 - five times a week (up to daily)?
- Did the selected parameters for this study fit with Crown's own parameters which it might use in the identification of problem gamblers under usual circumstances?
- Why was it determined that a minimum of two criteria needed to be met (rather than, in certain circumstances, just one)?
- Do EGMs and table games represent similar levels of potential harm? The identified parameters are the same for both (that is, \$500 loss per session)

5.2.3: Attachment 3

If different limits were considered for some of the parameters used to indicate problem gambling, how would this affect the results?

- What would be the impact on the size of the contact field if there had been a change in criteria – for example, relaxing the limit to \$100 per session instead of \$500? Or gambling 'twice (or more) per week' instead of 'five (or more) times per week'?

Implementation

Contact was made with 666 of the 1014 patrons meeting a minimum of two criteria.

- What were the main reasons for not being able to make contact with the other 348 identified?
- Were there any common characteristics in the group 666 that were able to be contacted? That is, are those 666 in some way distinct from the 348 that could not be?
- Do the 666 contacted people provide a suitable cross-section of respondents?
- In contact with the 666 identified persons, what measures were employed to ensure the reduction of 'false negatives' regarding self-identification of problem gambling?

Analysis of results

The Commission would like to understand the results of this study in the context of other responsible gambling initiatives.

- Do we know the reasons for the 102 self-exclusions during the same period? While just four of those people electing for self-exclusion would have been flagged by this study (meeting two or more criteria), is there anything that could be drawn from the remaining 98 in respect of the parameters/flags used for this study?
- Are there any differences between the rates of self-identified problem gambling following standard RSG intervention (observation alone) and those following contact made under this study?

Implications for further activity

- Can Crown outline how they will continue to use player data in conjunction with observable signs to detect customers who may be experiencing difficulties?

If you wish to discuss any matter relating to Crown's attendance at the Commission meeting, please feel free to contact me on [REDACTED].

Regards

[REDACTED]
Catherine Myers
CEO

5.2.4 Attachment 4



Attachment 4

Direct Line:
Direct Fax:
E-mail:



By Email and post -



3 May 2016

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

Dear Ms Myers

Section 25 Recommendation 5

I refer to our meeting on Thursday, 28 April 2016 at your offices in Richmond where Sonja Bauer, Joseph Bufalino and I presented on Section 25, Recommendation 5. As requested, please find attached a copy of the slides presented.

As you would be aware, this information is commercially confidential to Crown Melbourne and it is provided to the Commission in the performance of their regulatory functions. Crown anticipates that it will be treated in the usual confidential manner and not disclosed to any third parties, pursuant to the secrecy provisions of the *Gambling Regulation Act 2003 (Vic)* including the following:

10.1.30 General duty of confidentiality

- (1) A regulated person must not, directly or indirectly, make a record of, or disclose to someone else, any protected information acquired by the person in the performance of functions under a gaming Act or gaming regulations.

Should you require any additional information regarding this matter, please don't hesitate to contact my office on

Yours sincerely



Debra Tegoni
Executive General Manager – Legal and Regulatory Services

Crown Melbourne Recommendation 5



28 April 2016





VCGLR's Fifth Review of the Casino Operator and Licence pursuant to Section 25 of the Casino Control Act 1991 (Vic) Recommendation 5

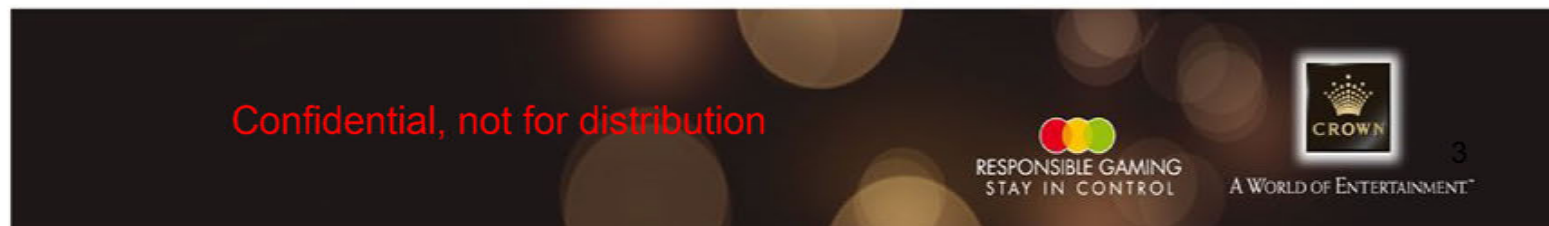
Sonja Bauer and Joseph Bufalino





To assess the effectiveness of the use of player data in relation to intensity, duration and frequency of play as a tool to assist in identifying potential problem gamblers, the VCGLR recommends that:

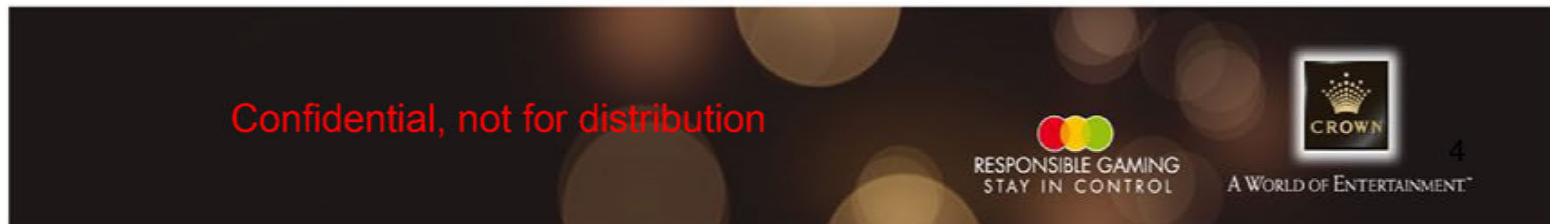
- Within 18 months, Crown Melbourne Limited trial for a reasonable period the use of player data analysis as an initial indicator to identify players who may be having problems with their gambling; and
- The Crown Melbourne Limited Board and Crown Limited's Responsible Gaming Committee consider the effectiveness of the trial; and
- Crown Melbourne Limited provides a copy of the report on the outcome of the trial to the VCGLR within 3 months of the report being considered by the Responsible Gaming Committee and the Crown Melbourne Limited Board.





Objective

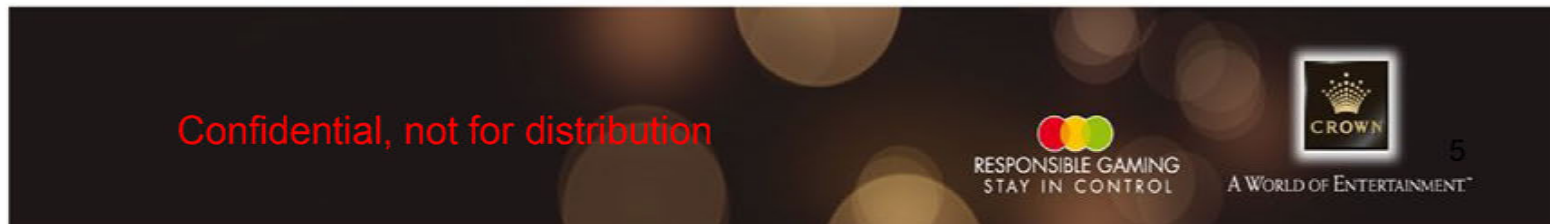
- Using information from a trial for a reasonable period, provide an indication of the effectiveness of using player data as a tool to assist in identifying potential problem gamblers





Limitations

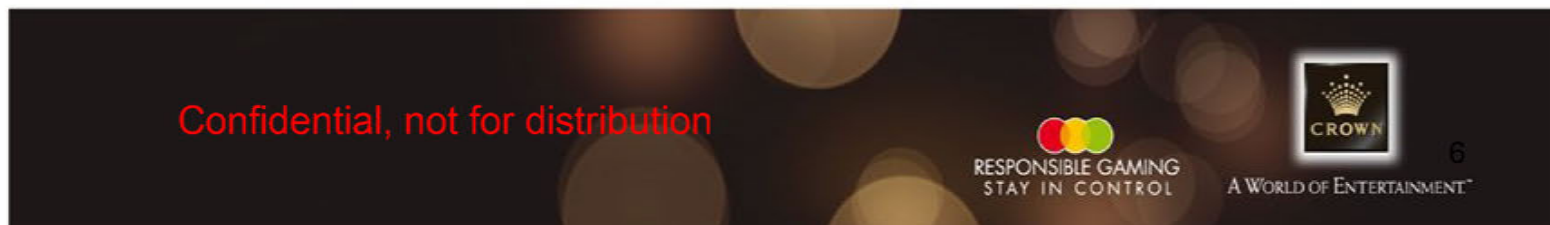
- Loyalty Program data
- Reliance on card use
- Not all Crown customers are members





Methodology

- Literature Review
- Selection of parameters
- Trial period was from 9 January 2015 to 17 April 2015 and was conducted by Responsible Gaming department employees





Parameters

1. Visitation frequency (five times per week up to daily) combined with levels of expenditure on gaming machines (\$500+ lost per session) over a period of time (intensity) (over one month)
2. Multiple increases or disabling of pre-commitment limits (intensity) (over three months)
3. Change in expenditure over six months (by a factor of three up or down) (intensity)
4. Gambles for five or more hours without a break of 15 minutes or longer (duration) (one month)
5. Gambles every day of the week over a period of time (frequency) (over one month)
6. Levels of expenditure on gaming machines (\$500+ lost per session) over a period of time (intensity) (one month)
7. Levels of expenditure on table games (\$500+ lost per session) over a period of time (intensity) (one month)

Confidential, not for distribution





Parameters contd.

- Parameter 1 is drawn from the SkyCity Auckland model, Parameter 6 is an extrapolation of this
- Parameter 2 is a hypothesis that a person frequently increasing or disabling limits altogether may be experiencing difficulty
- Parameter 3 seeks to identify behavioural change
- Parameters 4 and 5 are research based
- Parameter 7 was added after one month of the trial





Parameters contd.

‘.... while frequency and intensity of gambling was a good warning sign of potential problem gambling (as these behaviours were commonly shown by problem gamblers), by themselves they were not good at identifying a problem gambler as they did not differentiate very well between problem and nonproblem gamblers....’

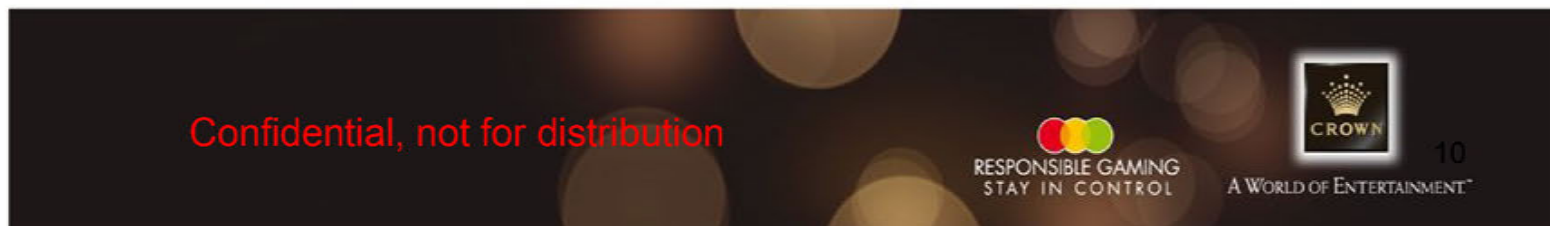
Thomas, A., Delfabbro, P. and Armstrong, A. (2014) Validation study of In-Venue Problem Gambler Indicators, Gambling Research Australia





Findings

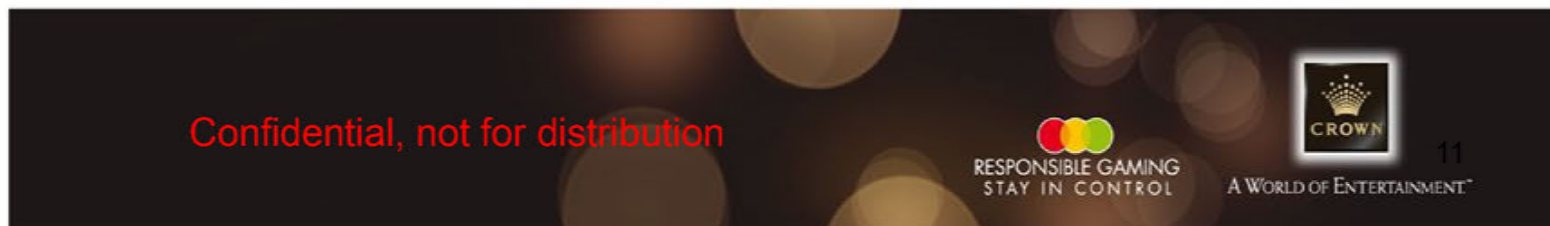
- In total, 1,014 customers were identified as having reached two or more flags in the trial period (1.3% of 78,000 in the data source)
- Of these customers, RGLOs were able to make personal contact on the casino floor with 666 customers (respondents)
- Of the 666 respondents contacted, 634 (95%) during the interview process maintained that they were comfortable with their level of play and they did not require any responsible gaming assistance





Findings

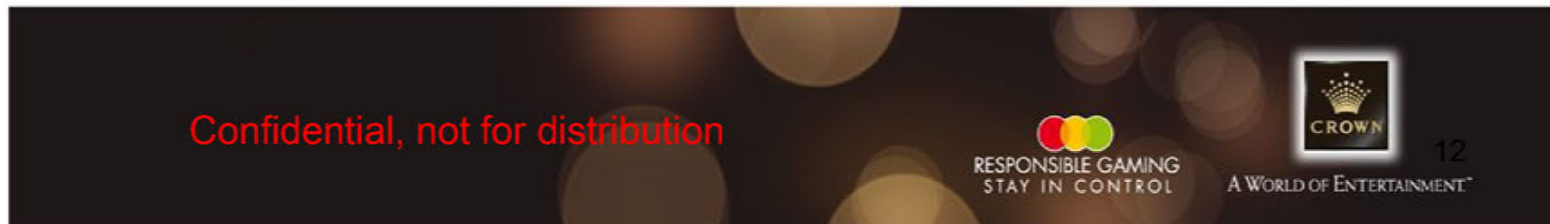
- Of the 666 contacted respondents, 32 (5%) indicated that they had some concerns with their gaming behaviours (0.04% of 78,000 in the data source)
- These 32 respondents were provided with relevant responsible gaming information and contact details for the RGSC
- They undertook to contact the RGSC if they required assistance or had further concerns with their gambling behaviours
- As at 30 June 2015, one respondent (0.2%) subsequently contacted the RGSC for further information (which was provided)





Findings

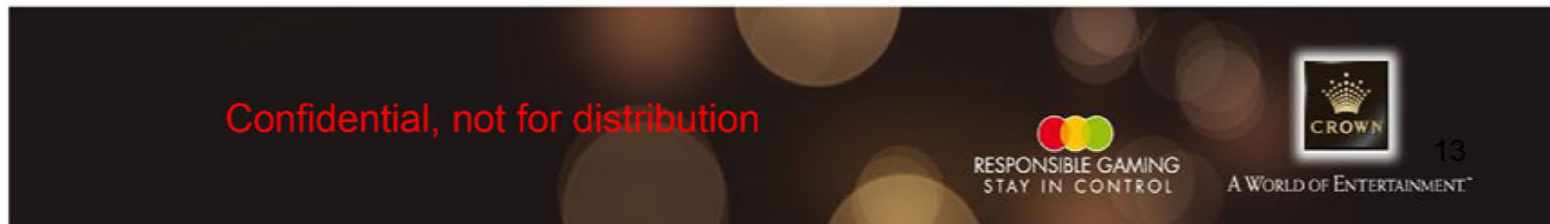
- Separately, during the trial period, 102 customers (across the entire Crown customer base) elected to self-exclude. Of these 102 customers, only four (4%) were among the 1,014 customers who had reached two or more flags during the trial





Conclusion

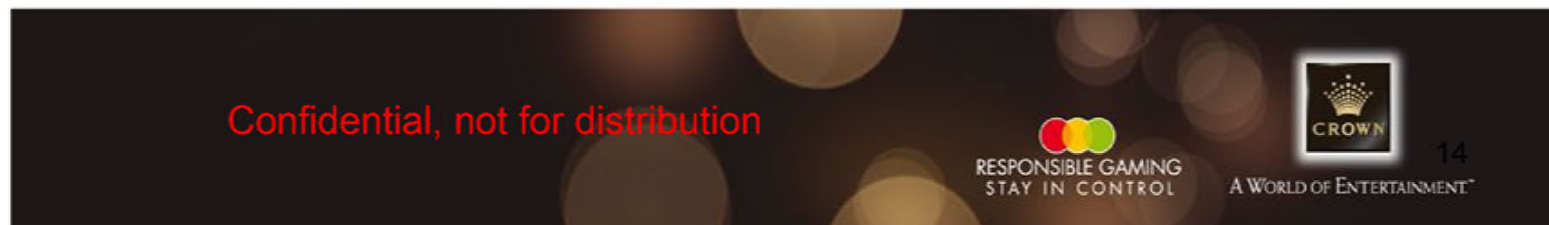
- The objective of the trial was to provide an indication of the effectiveness of using player data as a tool to assist in identifying potential problem gamblers
- The project was a useful exercise to determine whether the use of player data in relation to intensity, duration and frequency of play is effective as a tool to assist in identifying potential problem gamblers
- Based on the trial conducted, it appears there is only limited value in this tool





Conclusion contd.

- Crown's view continues to be that the most effective means of identifying potential problem gamblers is through the detection of observable signs of problem gambling behaviour within the venue (e.g. stress, aggression, etc.)
- Staff are trained to refer customers who seek assistance or who are displaying other observable signs to RGLOs
- This allows for the personalised and individually focused opportunity to connect with the customer and discuss their gambling behaviours



6.1. Crown presentation – Trial to assess the effectiveness of the use of player data

The Chair welcomed Ms Debra Tegoni, Ms Sonja Bauer and Mr Joe Bufalino, from Crown Melbourne Limited (Crown) to the meeting.

Members viewed a power point presentation and heard from Ms Bauer regarding Crown's report on the outcome of recommendation 5 from the Fifth Casino Review to assess the effectiveness of the use of player data in relation to intensity, duration and frequency of play as a tool to assist in identifying potential problem gamblers.

Members queried a number of matters from the presentation and were advised:

- There were limitations to the trial as not all Crown customers are members of the Loyalty program.
- Setting the parameters for the trial was very difficult and a literature review was conducted to assist in selecting the parameters (flags). There was no research identified that produced better parameters.
- A total of 1,014 customers were identified as having reached two or more flags; of which, 666 customers were approached by a Responsible Gambling Liaison Officer (RGLO); of which, 32 indicated they had concerns with their gaming behaviours; and of which, one customer subsequently contacted staff for further information. Separately, during the trial period, 102 customers across the entire Crown customer base elected to self-exclude. Of these, four customers were among the 1,014 identified customers.
- If customers were not alone, they were not approached due to privacy reasons.
- Crown's view continues to be that the most effective means of identifying potential problem gamblers is through the detection of observable signs of problem gambling behaviour within the venue. These signs include stress, aggressive behavior, visits to the ATM, not taking care of themselves and not engaging with their surroundings. Every interaction is recorded and experience shows that customers are more likely to engage when stressed.

Attachment 6

- Crown saw only limited value in using player data as a means for identifying someone as a problem gambler. It is considered that using the data to initiate interaction was questionable. However they noted that after the customer has been observed exhibiting signs, there could be benefit in staff referring to such data to reinforce observations and inform the subsequent interaction. It is a complex issue as not all problem gamblers exhibit observable signs.
- There are over 650 interactions per month and follow up is labour intensive with only 14 staff on the team. It is a balance to achieve the best outcome with the resources available. There are careful watching products available and Crown is using a combination of approaching customers and staff referrals from the floor.

In the course of the discussion, the Commission indicated to Crown that further information would be beneficial in relation to:

- whether any conclusions could be drawn by analysing data concerning the 348 individuals not contacted by Crown
- in relation to the 102 patrons who excluded themselves in the relevant period, whether analysis could occur from that data set to determine whether there are any common parameters/flags existing
- whether further sensitivity analysis could occur, for example concerning the impact of increasing or decreasing the existing parameters/flags by 10% on the number of customers identified.

Members also noted that there is further work which could be done to continue to assess how player data could be useful in identifying problem gambling and to keep the dialogue ongoing, the matter should be put on the agenda for the next regular meeting with the Crown Executive.

The Chair thanked the Ms Debra Tegoni, Ms Sonja Bauer and Mr Joe Bufalino for attending and presenting to the meeting.

Upon receipt of the further information (see above), the Commission will consider Crown's progress with respect to Recommendation 5.

5.2.7 Attachment 7



Victorian Commission for
Gambling and Liquor Regulation

49 Elizabeth Street, Richmond VIC 3121
GPO Box 1988, Melbourne VIC 3001
T: 1300 182 457
www.vcglr.vic.gov.au

Attachment 7

1 June 2016

Our ref:CD/16/13067

Ms Debra Tegoni
Executive General Manager
Legal & Regulatory Services
Crown Melbourne Limited
8 Whiteman Street
SOUTHBANK VIC 3006

Dear Ms Tegoni ^{Debra}

**Presentation to the Commission – *Fifth Casino Review Recommendation 5* –
Effectiveness of the use of player data analytics**

On behalf of the VCGLR Executive and Commissioners, I would like to personally thank you, Ms Sonja Bauer and Mr Joe Bufalino for your presentation and subsequent discussion on the *Fifth Casino Review Recommendation 5* at the April Commission meeting.

The Commission remains committed to exploring the use of player data to identify problem gambling. This will build on Crown's already strong delivery of responsible gaming, and potentially provide alternative avenues for proactive intervention.

In my letter of 11 April (our reference CD/16/8136) I outlined some questions around the methodology of the study undertaken by Crown on the use of player data, and whether tweaking the criteria might broaden the potential number of parties subject to contact by Crown under the trial.

At the Commission meeting three points in particular were raised:

- whether any conclusions could be drawn by analysing data concerning the 348 individuals not contacted by Crown
- in relation to the 102 patrons who excluded themselves in the relevant period, whether analysis could occur from that data set to determine whether there are any common parameters/flags existing
- whether further sensitivity analysis could occur, for example concerning the impact of increasing or decreasing the existing parameters/flags by 10% on the number of customers identified.

5.2.7: Attachment 7

The Commission looks forward to receiving further information from Crown in relation to the above points.

If you have any questions or wish to discuss any matters arising out of the Commission meeting, please feel free to contact me directly on [REDACTED]

Regards

[REDACTED]

Catherine Myers
CEO

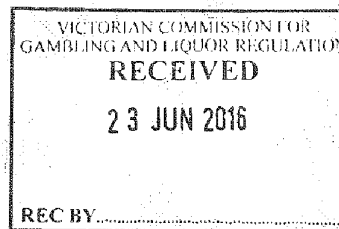
5.2.8 Attachment 8



Attachment 8

22 June 2016

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

Dear Ms Myers *Catherine*

Presentation to the Commission – *Fifth Casino Review* Recommendation 5 – Report on trial to assess the effectiveness of the use of player data analysis (“Report”)

I refer to your letter dated 1 June 2016, seeking further information about three points raised at the Commission meeting at which Crown presented its Report and its methodology in response to the Commission’s Recommendation 5 of the *Fifth Casino Licence Review*.

Each query you have raised is responded to in turn:

1. Whether any conclusions could be drawn by analysing data concerning the 348 individuals not contacted by Crown.

The trial identified 1,014 customers whose recorded activity reached two or more ‘flags’ (as detailed in the Report). As we confirmed with you at the meeting, Crown’s goal was to make contact with all identified customers, however, due to operational and privacy reasons, 348 were unable to be contacted. For example, where identified customers were with friends/family, staff would not approach and attempt to do so at a later date. Further, as identified customers were located via an active page to Responsible Gaming Liaison Officers (“RGLOs”), once RGLOs attended the identified location, the identified customers were sometimes no longer present. On occasion, RGLOs may also have been required or occupied in other activities such as performing self-exclusions etc. We confirm that all contacts were indiscriminate, with the limitation only of operational and privacy matters, and were not due to any particular flags or other restrictions. No individual patron was excluded from the trial.

Accordingly, we consider that the data alone would be insufficient to draw any further conclusions without customer contact.

2. In relation to the 102 patrons who excluded themselves in the relevant period, whether analysis could occur from that data set to determine whether there are any common parameters/flags existing.

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5.2.8 Attachment 8



Crown intends to review the ability to analyse player data for persons who self-exclude, to determine whether any meaningful or common themes can be identified. As we discussed with the Commission this is an important process and Crown will undertake this in a considered manner. Once we have considered this internally, including with our Crown Resorts Responsible Gaming Committee Board, we intend to come back to the Commission on this matter.

3. Whether further sensitivity analysis could occur, for example concerning the impact of increasing or decreasing the existing parameters/flags by 10% on the number of customers identified.

Crown has conducted analysis using the same parameters (with the exception of Flag 2 'Multiple increases or disabling of pre-commitment limits' as this data is no longer available due to the introduction of the YourPlay Scheme). This data was run in the same manner as month one of the trial using the latest data (16 June 2016), with the data source being full Crown Signature Club members with gaming activity in the prior three month period, which represented approximately 100,000 members. The findings were within an acceptable range when compared with month one of the original data set. Increasing the sensitivity by +10% resulted in a 15% decrease of Individuals; decreasing the sensitivity by -10% resulted in a 2% increase of Individuals.

Please let me know if you have any further queries or concerns.

Yours sincerely



Debra Tegoni
Executive General Manager – Legal & Regulatory Services

176538_3.docx

5.2.9: Attachment 9

TIM PALLAS MP STATE MEMBER FOR TARNEIT

Shadow Treasurer | Shadow Minister for Employment

P: [REDACTED] E: [REDACTED] W: timpallas.com.au
1 Duncans Road Werribee VIC 3030 | PO Box 836 Werribee 3030

ATTACHMENT 9

Mr Rowen Craigie
 Chief Executive Officer and Managing Director
 Crown Resorts
 Level 3, Crown Towers
 8 Whiteman Street
 Southbank VIC 3006

16 September 2014

Dear Mr Craigie,

I write regarding the *Casino and Gambling Legislation Amendment Bill 2014* (the Bill) and Labor's recent discussions on the Bill.

Please see below commitments from Crown Melbourne (Crown) essential to securing the Victorian Parliamentary Labor Party's support for the Bill.

RETRENCHED WORKERS RETRAINING PACKAGE (Four years)

Crown will offer accredited training places to 500 retrenched Victorian workers over the next 4 years. After the completion of their training, these workers will receive a certificate of qualification and will have the opportunity to apply for jobs at Crown or elsewhere within the hospitality and related industries.

INCREASED RESPONSIBLE GAMBLING RESOURCES (Duration of the licence)

Crown will increase resources for its 24/7 Responsible Gaming Support Centre (RGSC). The Centre will be resourced by an additional two Responsible Gaming Liaison Officers (RGLOs) (a 40% increase) and one additional Responsible Gaming Psychologist (RGP) (a 50% increase). RGLOs are specially trained in all aspects of Crown's RSG programs and are supported in Melbourne by Responsible Gaming Psychologists and a Chaplain to assist those customers who may be experiencing difficulties with their gambling behaviours. This increase will have a focus on automated tables.

5.2.9: Attachment 9

It is my intention to ask the Victorian Commission for Gambling and Liquor Regulation to hold on file this letter and your favourable response. Moreover if Victorian Labor forms Government after the 29th of November 2014, Crown's full delivery of these commitments will be a specific Term of Reference for the next regular Section 25 Licence Review to be held by 2018.

In light of these undertakings from Crown, the Victorian Parliamentary Labor Party will not oppose the passage of the Bill.

Yours sincerely,



Hon. Tim Pallas MP
Shadow Treasurer
Shadow Minister for Employment

5.2.10: Attachment 10

Rowen Craigie
Chief Executive Officer



By Mail and Email

ATTACHMENT 10

13 October 2014

Mr Bruce Thompson
Chairman
Victorian Commission for Gambling and Liquor Regulation
49 Elizabeth Street
NORTH RICHMOND VIC 3121

Dear Mr Thompson

Agreement between Crown Melbourne Limited and the State of Victoria – Application to the Victorian Commission for Gambling and Liquor Regulation (“Commission”),

I refer to your letter dated 24 September 2014 inviting Crown Melbourne Limited (“Crown”) to make a submission as to how, if application under section 16 of the *Casino Control Act 1991 (Vic)* (“Act”) is granted, Crown will foster responsible gambling in order to minimise harm caused by problem gambling and accommodate those who gamble without harming themselves or others.

1. Background

Crown has demonstrated a consistent and ongoing commitment to the responsible service of gaming since its inception. Several of Crown’s responsible gaming initiatives and programs have been in place since the Melbourne casino’s opening in 1994. In March 2002, Crown introduced a world first in responsible gaming initiatives by establishing a Responsible Gaming Support Centre at Crown.

The Responsible Gaming Support Centre, which operates 24 hours a day, seven days a week, is a facility which includes a dedicated team of Responsible Gaming Liaison Officers, Responsible Gaming Psychologists, a Chaplaincy Support Service, support staff and managers who are tasked with implementing Crown’s responsible gaming initiatives and providing a focal point for interacting with customers who may need support. In addition to implementing responsible gaming programs and services, the Responsible Gaming Support Centre (“Centre”) employees also develop, implement and deliver responsible gaming training to relevant Crown staff.

In light of the proposed variations to the Casino Licence which would enable Crown to install more gaming product, Crown considers that the most effective way to assist in minimising any harm caused by problem gambling is to increase its resources that are already expert in and targeted to this area at Crown, together with leveraging those resources to assist both customers and staff alike.

Crown Resorts Limited

ABN 39 125 709 953

Crown Towers
8 Whiteman Street
Southbank 3006
Victoria Australia

Tel: +613 9292 8666
Fax: +613 9292 8815

5.2.10: Attachment 10

Page 2
13 October 2014

2: Casino and Gambling Legislation Amendment Bill 2014 ("Bill") and Crown's Increased Responsible Gambling Resources Commitment

As an outcome of the discussions to secure the Victorian Parliamentary Labor Party's support for the Bill, Crown has committed to increase its responsible gambling resources available at the Centre. These commitments include increased responsible gambling resources namely:

- a 40% increase in the Centre's resources with an additional two Responsible Gaming Liaison Officers; and
- a 50% increase in the Centre's resources with an additional Responsible Gaming Psychologist.

2.1 Responsible Gaming Liaison Officers

Crown currently employs five full time Responsible Gaming Liaison Officers who operate from the Centre and are specially trained in all aspects of Crown's responsible gaming programs. The Responsible Gaming Liaison Officers provide dedicated responsible gaming services and are supported by Responsible Gaming Psychologists and a Chaplaincy Support Service to assist customers who may be experiencing difficulties with their gambling behaviours. Crown will increase these services by 40%, employing two additional full time Responsible Gaming Liaison Officers.

2.2 Responsible Gaming Psychologists

Crown currently employs two highly skilled and casino experienced Responsible Gaming Psychologists who operate as part of and in the Centre. They provide a number of responsible gaming services including counselling and referral for customers. Both are currently engaged in a part time capacity, with the combined hours equalling one full time employed position. In addition to extensive experience in the responsible gaming field, they are highly experienced in other complementary areas. Their skills and expertise are highly specialised and valued as part of Crown's responsible gaming suite of services. Crown will increase these services by 50% and so endeavour to employ one additional part time Responsible Gaming Psychologist with relevant skills, expertise and experience. Depending on the outcome of the search for this person, Crown can increase the services provided by its current two Psychologists to ensure appropriate support and specialisation of experience. Accordingly, Crown will employ an additional appropriately qualified part-time resource or alternatively increase the resources provided by the current Responsible Gaming Psychologists by increasing their respective hours working at and from the Centre by an additional 50% by the end of June 2015.

Discussions with the Labor Party also resulted in Crown needing to ensure that the increase in responsible gambling resources would have a focus on automated tables. We also note the Commission's statement that problem gambling is very often associated with the playing of electronic gaming machines. Accordingly, Crown has considered how its increased responsible gambling resources as now committed may most effectively be implemented.

5.2.10: Attachment 10

Page 3
13 October 2014**3. Additional Resources Focus – Electronic Gaming Machines and Fully Automated Table Games****3.1 Responsible Gaming Psychologists**

The 50% increase in resources provided by the Responsible Gaming Psychologists will provide for the following additions to their services:

- The design and delivery of an ongoing and specialised training program for Responsible Gaming Liaison Officers. This training will focus on electronic gaming machines and fully automated table games products and will be created with the benefit of the expertise of, and facilitated by, the Responsible Gaming Psychologists.
- The creation, design and co-delivery of an electronic gaming machines focussed ongoing training program to Crown's Gaming Machines operational management (some 30 managers). Crown submits that a focus on managers is important as it aligns with Crown's Responsible Gaming "referral model" which recognises that not all staff have the skills, nor can they be expected to deal with or have expertise to recognise and deal with matters relating to the responsible service of gambling. Accordingly, they are trained and encouraged to refer any concerns to those who do have expertise and appropriate training, namely their individual managers and the Centre staff including the Responsible Gaming Liaison Officers. Using the Productivity Commission 2010, Gambling, Report no. 50, Canberra, and publications available from the Victorian Responsible Gambling Foundation as a guiding source for the training information and content, where key concepts on which the training will focus will include observable signs, odds of winning, common gambling myths, Player Information Displays and pre-commitment features (once finalised).
- The creation, design and co-delivery of a fully automated table games focussed ongoing training program for Crown's Table Games operational management (some 65 managers). The training will include observable signs, odds of winning, common gambling myths and Player Information Displays.
- Expanded contact with relevant community based services.
- Increased hours that extend the Responsible Gaming Psychologists' on-site availability and provide additional service hours and flexibility, including additional support hours for staff working with responsible gaming matters and face-to-face customer counselling.

The increased services and resources will take effect before 30 June 2015.

3.2 Responsible Gaming Liaison Officers

The 40% additional resources of two additional full time employed Responsible Gaming Liaison Officers will also provide the following increases and additions to the current duties of Responsible Gaming Liaison Officers:

- Participation in Responsible Gaming Psychologists designed staff training with a focus on electronic gaming machines and fully automated table games.
- Co-delivery of a fully automated table games focussed ongoing training program for Crown's Table Games operational management (see relevant comments and

5.2.10: Attachment 10

Page 4
13 October 2014

numbers above) and ensuring that pertinent parts of that training are incorporated in training for new Table Games staff.

- Co-delivery of an electronic gaming machines focussed ongoing training program for Crown's Gaming Machines operational management (see relevant comments and numbers above) and ensuring that pertinent parts of that training are incorporated in training for new Gaming Machines staff.
- Additional focus on electronic gaming machines, for example, additional time during the rosters required to be spent within the areas on the casino floor where electronic gaming machines are predominant with a view to ensuring that players of those products are appropriately supported.
- Additional focus on casino floor areas where fully automated table games are located, for example, additional time during the rosters required to be spent within areas on the casino floor where fully automated table games are predominant with a view to ensuring that players of those products are appropriately supported.
- Formalising Crown's current Gaming Machines Department operational management contact by establishment of regular meetings to discuss any responsible gaming concerns.
- Formalising Crown's current Table Games Department operational management contact by establishment of regular meetings to discuss any responsible gaming concerns.
- Regular participation in Gaming Machines Department employee briefings and additional support for gaming machines employees working with responsible gaming matters on the casino floor.
- Expanded contact with relevant community based services.

The recruitment process for the additional Responsible Gaming Liaison Officers will occur in two stages, with the first Responsible Gaming Liaison Officer appointment effective no later than 31 December 2014. The second Responsible Gaming Liaison Officer will be recruited and operational before the end of June 2015.

We trust that the above submission provides the Commission sufficient information as to how Crown will further enhance its responsible gambling programs and resources in order to minimise harm caused by problem gambling and accommodate those who gamble without harming themselves or others, and so secure an expeditious approval from the Commission to Crown's application.

Please feel free to Ms Debra Tegoni on [REDACTED] with regard to the matters of this letter or if you have any questions.

Yours sincerely

[REDACTED]

Rowen Craigie
Chief Executive Officer