

**From:** Sonja Bauer  
**Sent:** Mon, 2 Mar 2020 09:51:14 +1100  
**To:** Scott May  
**Cc:** Erika Russell;Tim O'Farrell;Joshua Preston;Joshua Preston;Sonja Bauer  
**Subject:** RE: Crown Melbourne Ltd - RSG Training application for CSE's - whether you wish to further amend your application

Dear Scott,

We refer to the above matter and your email received 20 February 2020.

Crown, in consultation with the VCGLR, has developed and accommodated a number of changes, as required by the key parties to ensure that the Responsible Gaming (**RG**) training and practices at Crown are best practice and continue to be a major focus and core value for the business.

Crown has reviewed the feedback from the DCJS, VRGF and VCGLR regarding the omission of specific observable signs from Crown's employee RG Training being:

- Spends \$300 or more in a session;
- Gambles on two or more machines at once; and
- Bets \$3 or more per spin, most of the time.

As identified by the 2014 Validation Study of In-Venue Problem Gambling Indicators (**Study**), the above observable signs are identified as *lower severity* and *possible problem gambling behaviours*. The Study further showed frequency, duration and intensity behaviors are also reasonably identified amongst those gamblers without problems, and it is further noted that by themselves, these indicators may not work as well to identify problem gamblers. Crown's RG training therefore focused the list of indicators to be reflective of the busy environment and to identify the observable signs predominantly of a more severe rating. The list enables the training to be reflective of the Casino specific environment and creates a checklist for the Electronic Gaming Machine (**EGM**) and Responsible Gaming (**RG**) team to effectively identify and respond to customers displaying the most relevant observable signs.

Crown's RG training as submitted, has been tailored to reflect the Casino environment and as identified in the Study *"Future users of the GBC-EGM-S should ensure that each item is suited to the gambling environment in which they intend to use it. A small number of changes to the checklist items may be necessary."*(page 148). The Study also highlighted *"that although there was a value in a wide array of items presented, almost half of the focus groups participants preferred a shorter checklist for practical use in a busy work environment"*(page 162). Crown's RG training reflects the Study and is more conducive to the busy Casino environment.

Additionally, Crown employs a number of enhanced Responsible Gaming measures, the key ones being:

- 24-hour real time monitoring of play periods, with multiple observation and interaction assessment points;
- The Crown Model (a data analytics tool for carded players, to proactively identify opportunities for interventions with customers who may be at risk of harm from their gambling);
- Dedicated 24-hour Responsible Gaming Centre and Responsible Gaming Advisors, including availability of Psychologists and Chaplain services;

- CCTV (including Facial recognition technology) and Surveillance team monitoring Self-excluded persons;
- RG monitored guest feedback – ‘Medallia’; and
- 24-hour RSA coverage.

There are many examples of the difference in environment at Crown as compared with other venues in Victoria and in the Study that necessitate a tailored approach to Crown’s RG training, including the most relevant observable signs:

- Crown’s EGM environment includes unrestricted mode EGMs, by Ministerial Direction under section 3.2.3(1) of the *Gambling Regulation Act 2003* (VIC), allowing for up to 1,000 EGMs to have a maximum bet above \$10 providing the customer, when playing the EGM, has a ‘Your Play’ time and spend limit set;
- Crown’s maximum bet on restricted machines is \$10 not \$5, as per all other venues in Victoria; and
- Hosted premium gaming rooms and personalised hosted customers, which ensure that there is greater interaction with our customers.

We trust the above clarifies why Crown does not believe the three observable signs noted in your email should be incorporated into Crown’s RG training.

With kind regards,

**Sonja Bauer** | Group General Manager Responsible Gaming | Crown Resorts Limited

[REDACTED] W:  
[www.crownmelbourne.com.au](http://www.crownmelbourne.com.au) [www.crownperth.com.au](http://www.crownperth.com.au)



AWARENESS. ASSISTANCE. SUPPORT

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

**Please consider the environment before printing my email**

**From:** Scott May [REDACTED]

**Sent:** Thursday, 20 February 2020 9:38 AM

**To:** Sonja Bauer [REDACTED]

**Cc:** Erika Russell [REDACTED] Tim O'Farrell [REDACTED]

Joshua Preston [REDACTED] Joshua Preston

**Subject:** Re: Crown Melbourne Ltd - RSG Training application for CSE's - whether you wish to further amend your application

Dear Sonja,

I refer to the above matter.

As you would know, VCGLR consulted and sought feedback from the Department of Justice and Community Safety (DJCS) in regard to the RSG training being developed by Crown. As you also probably know, DJCS developed the venue based RSG training.

DJCS has very recently provided feedback to the VCGLR. In its feedback, it has raised concerns with your application, principally, that the training does not incorporate all observable signs that are presently included in the venue based RSG training.

While this feedback has been unfortunately received late in the process, it is clearly something the Commissioners would need to consider. However, I am certainly mindful to provide Crown an opportunity to consider this and decide whether you wish to make further changes to the training, specifically, whether you want to address the concerns raised by DJCS or not.

My intention is that your changes and reasons (or any reasons not to change), along with the feedback from DJCS (and VRGF), can be all collectively considered by the Commissioners when they make their decision at their meeting.

Specifically, DJCS advised VCGLR that it considers the 2014 validation study should form the basis of any RSG training in Victoria (as that this research included people who play gaming machines at hotels, clubs and the casino).

DJCS stated that they are particularly concerned that the following signs have not been included in Crown's training:

- Spends \$300 or more in a session
- Gambles on two or more machines at once
- Bets \$3 or more per spin most of the time.

As you are aware, the VRGF raised similar concerns and requested that the observable signs be reviewed and updated. In response to the VCGLR raising these concerns with Crown, we note the following response from Crown made to the VCGLR on 20 December 2019:

*Crown additionally notes that the Observable Signs Check List was considered as part of the Responsible Gambling Ministerial Advisory Council (RGMAC) process for reviewing the code of conduct for venue operators. As RGMAC is in the process of reviewing possible improvements of the code of conduct for non-venue operators, this and other matters that would fall under the code of conduct for non-venue operators should be placed on hold until the RGMAC has completed its work.*

Given this feedback and to give you an opportunity to consider this development, the Chair has decided to defer any decision by the Commission until its March 2020 meeting.

It would be appreciated if you could outline any proposed changes to the training, or confirmation of no change (and any reasons you wish to put before the Commission) by **Friday 28 February 2020**.

Please note that, under the *Casino Control Act 1991*, approval for existing training expires in February 2020, but, pursuant to section 58B(6) of the Act, the existing approval does not expire until determination of your application.

Happy to discuss.

Regards,

Scott May | Director Legal Services & General Counsel  
Victorian Commission for Gambling and Liquor Regulation  
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