



**RESPONSIBLE GAMING COMMITTEE**  
Meeting of the Committee  
Tuesday, 9 February 2021 at 11.00am  
by videoconference



## Responsible Gaming Committee

Meeting of the Committee to be held on Tuesday, 9 February 2021  
by videoconference at 11.00am

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### Attendees

<i>Committee:</i>	John Horvath (Chair) Andrew Demetriou Toni Korsanos
	Mary Manos (Secretary)
<i>By Invitation:</i>	Ken Barton (Crown Resorts Limited) Sonja Bauer (Group GM Responsible Gaming – Australian Resorts) Rowan Cameron (GM – Responsible Gaming) Helen Coonan (Crown Resorts Limited) Kate Earl (RG Psychologist) Lauren Harris (Crown Resorts Limited) Alan McGregor (Crown Resorts Limited) Susan McNulty (RG Psychologist) Luke Overman (GM – Responsible Gaming) David Skene (Betfair) Melanie Strelein Faulks (Crown Perth)
	Alex Blaszczyński (RG Advisory Panel) Paul Delfabbro (RG Advisory Panel) Lia Nower (RG Advisory Panel)

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### AGENDA

1. [Minutes of Committee Meeting held on 2 December 2020](#)
2. [Matters Arising](#)
3. [Responsible Gaming Advisory Panel Recommendations – Update](#)
4. **Australian Resorts**
  - 4.1. [Australian Resorts Responsible Gaming Report](#)
  - 4.2. [Crown Melbourne Responsible Gaming Statistics](#)
  - 4.3. [Responsible Gaming Policy](#)
5. [Crown Melbourne Licence Review – Update](#)

6. **Betfair Responsible Gaming Report**
7. **Gaming Environment Scan**
8. **Other Business**
  - 8.1. **Review of Committee Charter**
  - 8.2. **Future Meetings**



**AGENDA ITEM 1:**  
Minutes of Meeting held on 2 December 2020



## Responsible Gaming Committee

Minutes of a Meeting of the Committee held on Wednesday, 2 December 2020  
by videoconference at 12.00pm

**Members Present:**

John Horvath (Chair)  
Andrew Demetriou  
Toni Korsanos

Mary Manos (Secretary)

**By Invitation:**

Ken Barton (Crown Resorts Limited)  
Sonja Bauer (Group GM Responsible Gaming – Australian Resorts)  
Rowan Cameron (GM – Responsible Gaming)  
Lauren Harris (Crown Resorts Limited)  
Alan McGregor (Crown Resorts Limited)  
Luke Overman (GM – Responsible Gaming)  
David Skene (Betfair) (up to Agenda Item 4 only)  
Melanie Strelein Faulks (Crown Perth)

**Apologies:**

Helen Coonan (Crown Resorts Limited)  
Barry Felstead (CEO – Australian Resorts)  
Joshua Preston (CLO – Australian Resorts)

**BUSINESS**

**Minutes of Meeting held on 20 October 2020:**

It was **RESOLVED** that the Minutes of the Responsible Gaming Committee Meeting held on 20 October 2020 be approved.

**Matters Arising:**

The Matters Arising paper was taken as read.

The Committee requested that the next meeting of the Committee be scheduled for two hours to accommodate the Responsible Gaming Advisory Panel.

It was noted that further consideration would be given to the Company's media monitoring strategy in consultation with Toni Korsanos.

**Betfair Responsible Gaming Report:** The Betfair Responsible Gaming Report was taken as read.

Amongst other matters, David Skene provided the Committee with an update on the following matters:

- through Gambling Harm Awareness Week, Betfair obtained promotional materials from the Victorian Responsible Gambling Foundation and heavily promoted the Awareness Week via various channels;
- Betfair had appointed a Responsible Gambling and Compliance Analyst;
- the Northern Territory Racing Commission wrote to all NT licensees (including Betfair) indicating that it was considering making changes to existing licence conditions which would require the operator to check that the debit/credit card used to deposit funds is in the customer's name; and
- the responsible gambling page website statistics were tracking well.

The Committee discussed the proposed licence condition changes and it was noted that while Responsible Wagering Australia was looking to discuss potential options with the Commission, that Betfair would need to consider ways in which it could address this requirement if implemented.

It was **RESOLVED** that the Betfair Responsible Gaming Report be noted.

**Australian Resorts Responsible Gaming Report:**

*Australian Resorts Responsible Gaming Report*

The Australian Resorts Responsible Gaming Report was taken as read.

Among other matters, Sonja Bauer highlighted the following:

- the Responsible Gaming Working Operations Group was continuing to progress the recommendations of the Responsible Gaming Advisory Panel;
- while the commencement of gaming operations at Crown Sydney had been deferred, establishment of the Responsible Gaming Centre was continuing to progress and recruitment for the remaining two responsible gaming team roles was continuing;
- since the re-commencement of gaming operations at Crown Melbourne, no responsible gaming issues had been encountered; and

- with the implementation of the Crown Perth online application for self exclusion, no customers had yet applied online.

Melanie Strelein Faulks presented the EFTPOS at Gaming Tables attachment, noting that no responsible gaming concerns had been identified.

The Committee discussed the material patron issue which occurred at Crown Perth during the reporting period and it was noted that no further contact had been made by the patron, his General Practitioner had not been granted consent to provide further updates to Crown and regular security patrols of the Responsible Gaming Centre were continuing. Melanie Strelein Faulks acknowledged the support provided by the legal and security and surveillance teams and the Crown Melbourne psychologists.

It was **RESOLVED** that the Australian Resorts Responsible Gaming Report be noted.

#### *Crown Melbourne Responsible Gaming Statistics*

The Crown Melbourne Responsible Gaming Statistics paper was taken as read.

#### **Responsible Gaming Advisory Panel Recommendations - Update:**

The Responsible Gaming Advisory Panel Recommendations – Update paper was taken as read.

Sonja Bauer advised the Committee that work was progressing on the implementation of the Recommendations and that the Crown Melbourne Responsible Gaming team was looking to recruit an analyst.

It was noted that any issues identified in implementation of the Recommendations should be addressed with the Panel when it presents at the next meeting of the Committee.

It was **RESOLVED** that the Responsible Gaming Advisory Panel Recommendations – Update be noted.

#### **Crown Melbourne Licence Review Update:**

The Crown Melbourne Licence Review Update was taken as read.

Sonja Bauer noted that the Company would re-engage with Focal having regard to the work it was undertaking with Aspers and that further consideration would be given to other possible data analytics tools.

In relation to the Recommendation 20 meeting with the VCGLR, it was noted that a proposed date would be discussed at the next Crown Resorts Board meeting.

It was **RESOLVED** that the Crown Melbourne Licence Review Update be noted.

**Crown Resorts Responsible Gaming Report:**

The Crown Aspinalls and Aspers Responsible Gaming Reports were taken as read.

It was **RESOLVED** that the Crown Resorts Responsible Gaming Reports be noted.

**Gaming Environment Scan:**

The Australian Resorts and United Kingdom Gaming Environment Scans were taken as read.

It was **RESOLVED** that the Gaming Environment Scans be noted.

**Future Meetings:**

The future meeting dates were noted.

**Closure:**

There being no further business, the meeting was declared closed at 12.44pm.

Signed

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Chair  
John Horvath





**AGENDA ITEM 2:**  
Matters Arising



## Responsible Gaming Committee

### Memorandum

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**To:** Responsible Gaming Committee  
**From:** Mary Manos  
**Date:** 5 February 2021  
**Subject:** **Matters Arising**

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Dear Committee Members

At the last meeting of the Committee, the Committee requested that the next meeting of the Committee be scheduled for two hours to accommodate the Responsible Gaming Advisory Panel. The Responsible Gaming Advisory Panel has been invited to attend the meeting at Agenda Item 3 and the length of the meeting has been extended accordingly.

Kind regards

Mary Manos  
**General Counsel & Company Secretary**



# Responsible Gaming Committee

## Memorandum

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**To:** Responsible Gaming Committee

**From:** Sonja Bauer

**Date:** 4 February 2021

**Subject:** **Responsible Gaming Advisory Panel Recommendations - Update**

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Dear Committee Members,

This paper provides an overview of the implementation of the Responsible Gaming Advisory Panel's (**Panel**) Recommendations (**Recommendations**) following its review of Crown's Responsible Gaming Framework. Attached as **Annexure A**, is a detailed table setting out the status against each Recommendation.

At the request of the Committee, the Panel has been invited to attend the meeting for this Agenda Item. It is proposed that the Panel join the meeting following consideration of this paper by the Committee.

### **Progress of Implementation**

The Responsible Gaming Working Operations Group has been working on the implementation of the Recommendations.

Since the last meeting of the Committee, the following Recommendations have been progressed:

*Recommendation 1* – The on-line Self Exclusion and Self Exclusion Revocation functionality has been implemented at both Crown Melbourne and Crown Perth. This will be implemented at Crown Sydney when gaming operations commence.

*Recommendation 2* – The script for Responsible Gaming Advisors (**RGAs**) in relation to motivating customers who self exclude to attend counselling at Gambler's/Gambling Help has been finalised, and RGAs have been trained in motivational interview techniques. RGAs are referring customers via a template of gambling help services, which has been developed for this purpose.

*Recommendation 4* – The process of applying for revocation (including Revocation Committee structures) has been reviewed, updated and implemented at both Crown Melbourne and Crown Perth, synergising this program across both resorts. The process for post revocation has also been finalised and implemented and an evaluation program is currently being developed.

*Recommendation 8* – The Security heads across the properties have indicated a strong preference not to promote the presence of Facial Recognition Technology, citing the potential for unintended consequences relating to criminality. The group was not adverse to the promotion of a camera

network for detection of breaches. This will be further reviewed.

*Recommendation 10* – Crown Melbourne and Crown Sydney's Responsible Gaming training was recently reviewed with oversight and approval being received by the relevant State Gaming Regulators. Crown Perth's Responsible Gaming training is not reviewed by the State Regulator, however, was also recently reviewed. This recommendation will become part of the annual training review for all Australian Resorts, which is planned to commence in Q1 FY22.

*Recommendation 12* – Responsible Gaming Psychologists have commenced the brochure review.

*Recommendation 17* – Crown Perth has scoped the development of a new Responsible Gaming Centre.

#### **Proposed Amendments**

In implementing the Recommendations, the Working Group has identified some key areas which require further consideration, resourcing and capital contribution. A verbal update on these Recommendations will be provided at the meeting.

Kind regards

Sonja Bauer  
**Group General Manager Responsible Gaming**



## Responsible Gaming Advisory Panel – Recommendations Table As at January 2021

Recommendation	Crown's Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
<p><b>Recommendation 1</b></p> <p>Crown should develop an online system for initiating the self-exclusion and/or third party exclusion processes and providing ongoing monitoring for patrons.</p>	<p><b>Recommendation Accepted</b></p> <p><b>Objectives:</b></p> <ul style="list-style-type: none"> <li>Facilitate ease of access to individuals who are off site and reflecting on their gambling behaviour and decrease the stigma associated with face to face sign up</li> <li>Provide access to web-based resources to reiterate the function of self-exclusion and explain the requirements and processes for revocation Applications</li> <li>Provide a personal dashboard allowing individuals to monitor the end-date of the exclusion period</li> <li>Could include a brief video of an Responsible Gaming Advisor (RGA) supplementing information given at time of exclusion possibly in a FAQ format</li> </ul>	<p><b>Completed</b></p> <p>An online system for initiating Self Exclusion (and Revocation) has been implemented at Crown Perth (CP) and Crown Melbourne (CM) and will be for Crown Sydney (CS).</p> <p><b>Outstanding:</b></p> <p><b>Current status</b></p> <ul style="list-style-type: none"> <li>Video development pending.</li> <li>Dashboard development being scoped in preparation for the appointment of Responsible Gaming (RG) Data / Innovation Co-Ordinator.</li> <li>In-built future capacity to evaluate the program and who and when individuals are accessing the information.</li> <li>Promotion of online system - customer communications and engagement requires input from marketing.</li> <li>3-month post audit and testing on data entry points to be established.</li> </ul> <p><b>Update from 2 December 2020</b></p> <p>The on-line Self Exclusion and Self Exclusion Revocation functionality has been implemented at both Crown Melbourne and Crown Perth. This will be implemented at Crown Sydney shortly.</p>	<p>Responsible Gaming Working Operations Group (RGWOG)</p> <p>IT and IT Governance</p> <p>Digital Marketing</p> <p>Audio Visual</p> <p>Legal</p>	September 2021	No
<p><b>Recommendation 2</b></p> <p>The provision of external support and treatment services should be extended to all applicants for self-exclusion as a matter of course.</p>	<p><b>Recommendation Accepted for CM.</b></p> <p><b>Process already established at CP.</b></p> <ul style="list-style-type: none"> <li>Ensure (as far as practicable) that self-excluded customers are seeking help at a time that it has been demonstrated to support individuals in managing their gambling behaviour</li> <li>Develop a process (modelled on CP) that</li> </ul>	<p><b>Recommendation is linked to Recommendation 4</b></p> <p><b>Completed</b></p> <ul style="list-style-type: none"> <li>RGA script to motivate Self Excluding applicants.</li> <li>Template for referral directly to counselling service.</li> <li>Training of RGAs re motivational interviewing.</li> </ul>	<p>RGWOG</p> <p>GH</p> <p>VRGF</p> <p>RGA</p>	TBD	No

*Timeline – Implementation of Recommendations*

Recommendation	Crown's Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
	<p>enables ease of access to counselling for self excluded customers and provides a 'seamless access to services following entry into the (S/E) program' page 45</p> <ul style="list-style-type: none"> <li>Create a basis for evaluation when/if the customer applies for Revocation 'applicants entering counselling programmes immediately or shortly after S/E can be interpreted as having genuine motivations to improve their position.' Page 46</li> </ul> <p>*To be included in Revocation Matrix</p>	<ul style="list-style-type: none"> <li>RGAs currently actively refer applicants to Gambling/Gambler's Help (GH) service for counselling, encourage them to attend counselling and provide them with contact details.</li> </ul> <p><b>Outstanding:</b></p> <p><b>Current Status</b></p> <ul style="list-style-type: none"> <li>Development of evaluation of uptake in train.</li> <li>Counsellor feedback forms pending (require input from service at CM to complete).</li> <li>Promotion of Service – in place at CP, pending establishment of process at CM.</li> </ul> <p><b>Work has been done to progress, awaiting further direction from the Victorian Responsible Gambling Foundation (VRGF )</b></p> <p><b>Update from 2 December 2020:</b></p> <p>The script for Responsible Gaming Advisors (RGAs) in relation to motivating customers who self exclude to attend counselling at Gambler's/ Gambling Help has been finalised, and RGAs have been trained in motivational interview techniques. RGAs are referring customers via a template of gambling help services, which has been developed for this purpose.</p>			
<p><b>Recommendation 3</b></p> <p>Crown should institute post-revocation monitoring to identify possible risk indicators (such as breach attempts, contacts with staff seeking immediate reinstatement etc.) and intervene to prevent relapse.</p>	<p><b>Recommendation Accepted</b></p> <p>To monitor applicants who have successfully revoked their Self Exclusion with a view to detecting possible risk factors for future applicants and assisting in relapse prevention.</p>	<p>Successful Revocation applicants are currently monitored for 12 months and are required to attend a face to face interview 3 months following their return to the property.</p> <p><b>Formal Evaluation</b></p> <p>A more formalised gathering of data in order to evaluate the efficacy of the process in the longer term, which may require additional resources.</p> <ul style="list-style-type: none"> <li>Analysis of random sample at CM and CP, pending appointment of RG Data and Innovation Coordinator.</li> <li>Determining the possibility of using data gathered by Facial Recognition Technology</li> </ul>	<p>RGWOG</p> <p>RGA</p> <p>GH</p> <p>Responsible Gaming Advisory Panel (RGAP)</p> <p>Statistician or data analyst (this may be available in house)</p>	<p>January 2021</p>	<p>Yes</p>

**Timeline – Implementation of Recommendations**

Recommendation	Crown's Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
		(FRT) as an objective measure of breaching. Recommend consulting with dedicated GH service/s to ensure all relevant measures are included.			
<p><b>Recommendation 4</b></p> <p>Strongly suggests that all Crown properties establish a contractual relationship with a treatment agency and/or specific providers who demonstrate they have received specialised training in gambling counselling and will evaluate clients to a similar standard.</p>	<p><b>Recommendation Accepted (CM)</b></p> <p><b>Relationship already established at CP and CS (contractual at CS)</b></p> <p><u>Revocation Process:</u></p> <p>To ensure Crown's Revocation process is best practice in harm minimisation for customers seeking to return to the gaming floor following Self Exclusion or Exclusion, counselling and assessment is undertaken by a professional with expertise in gambling issues, ensuring:</p> <ul style="list-style-type: none"> <li>All applicants receive specialist expertise and guidance at time of considering re-entry to gaming floor. This may support them in deciding whether or not they are ready to return to the gaming floor</li> <li>Review of an individual's application is undertaken by a professional with expertise in problem gambling prior to returning to the gaming floor.</li> </ul> <p>To ensure consistency of reports written for Revocation applications to allow for fairness and transparency in decisions made by the Revocation Committee.</p> <p><u>Additional:</u></p> <p>Direct referral of customers to counselling support following Self Exclusion (Rec. 2).</p> <p>Allows for the development of ongoing improvements in all referrals of customers.</p> <p>Will expedite development of assessment tool to be used in Revocation applications (Recommendation 5 – development of 'a uniform evaluation protocol').</p>	<p>Completed at CP and CS.</p> <p>CM has progressed discussion with VRGF, awaiting a response as to when the relationship can progress (see Recommendation 2).</p> <p><b>Outstanding:</b></p> <p><b>Current Status</b></p> <ul style="list-style-type: none"> <li>Responsible Gaming Psychologists (RGPs) established a broad outline re template and report for counsellors – requires consultation with nominated service provider to finalise.</li> <li>VRGF last contact February 2021, has been escalated to CM Director Corporate Affairs.</li> </ul> <p><b>Impediments</b></p> <ul style="list-style-type: none"> <li>Potential for the VRGF to decide against proceeding.</li> <li>Should this prove to be the case, implementing this recommendation at CM would necessitate establishing a relationship with a private service that could require a fee for service.</li> </ul> <p><b>Update from 2 December 2020:</b></p> <p>The process of applying for revocation, including Revocation Committee structures, has been reviewed, updated and implemented at both Crown Melbourne and Crown Perth, synergising this program across both resorts. The process for post revocation has also been finalised and implemented and an evaluation program is currently being developed.</p>	<p>RGWOG</p> <p>VRGF</p> <p>GH</p> <p>RGA</p> <p>Financial contribution required if chosen counselling body requires a fee for service</p> <p>Note: Payment for service is suggested by the RGAP</p>	<p>TBD - within 4 weeks of relationship being established at CM – still pending</p>	<p>No</p>

**Timeline – Implementation of Recommendations**

Recommendation	Crown’s Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
<p><b>Recommendation 5</b></p> <p>A group of gambling clinicians and a measurement expert should be empanelled to develop a uniform evaluation protocol for revocation and reinstatement that is universally applied to all gamblers across properties.</p>	<p><b>Recommendation Accepted</b></p> <p>To establish a transparent protocol for the revocation process that will ensure thorough and efficient evaluation of revocation applicants across all Crown Resorts. The protocol also aims to assist gambling counsellors in clinical evaluation and report writing.</p>	<p><u>Recommendation is related to completion of Recommendation 3 and 4</u></p> <p>Preliminary deliberations have commenced on material to be assessed, including clinical and objective material.</p> <ul style="list-style-type: none"> <li>Commenced formulation of a working group.</li> <li>RGAP member to assist selecting clinicians from GH (CP and CM), RGP to design a rigorous questionnaire. (Pending).</li> <li>Further consultation and input can occur with the relevant counselling providers when the relationship with the treatment service is at CM (See Recommendation 2).</li> </ul> <p>There are no substantive updates for this period.</p>	<p>VRGF</p> <p>GH</p> <p>RGP</p> <p>RGAP</p>	TBD	No
<p><b>Recommendation 6</b></p> <p>Players should be allowed to reapply for VIP room access and/or marketing only six-month post-reinstatement and ONLY if the counsellor evaluation deems those options should be available based on assessment risk level.</p>	<p><b>This recommendation is partially accepted – GH counsellors will not be asked to include assessment of an applicant’s level of risk for attending VIP</b></p> <p><b>Part 1: Policy already in place at CP and CM, and will be implemented at CS.</b></p> <p>Players should be allowed to reapply for VIP room access and/or marketing only six-month post-reinstatement</p> <ul style="list-style-type: none"> <li>Reduce the possibility of players experiencing gambling harm in order to achieve VIP status</li> </ul>	<p><b>Current Status</b></p> <ul style="list-style-type: none"> <li>CP and CM have in place a policy where VIP membership is not permitted within first 6 months of revocation – considering how this will apply to CS as it is VIP only.</li> <li>Access is dependent upon a review by RG to determine whether a player should proceed to VIP status or not. Without this recommendation from RG, the player is unable to gain membership or access.</li> <li>Counsellors assessing Revocation applicants will not be asked/required to make a recommendation as to whether the applicant should have access to VIP – the decision is the responsibility of the RG departments.</li> </ul>	<p>VRGF</p> <p>GH</p> <p>RGWOG</p>	January 2021	Yes
<p><b>Recommendation 7</b></p> <p>Crown should undertake a statistical, longitudinal evaluation of facial recognition software detection of breaches, demographics of players accused of breaching, and outcomes of software-detected breaches to date to inform next</p>	<p><b>Recommendation Partially Accepted</b></p> <p>To provide information for communication and education of self-excluding customers who attempt to breach the conditions of self-exclusion. The RGAP also suggests that analysis of findings in this project will also provide material for more targeted messages to Crown customers.</p>	<p>Establishment of working group to include a technical advisor and an experienced social science researcher to ensure that resources are not misdirected, and that the analysis is achieving what Crown requires from the project.</p> <ul style="list-style-type: none"> <li>Technical is advice required on how to either align the systems or how to most efficiently access the data.</li> <li>Analysis of FRT data already collected but</li> </ul>	<p>RGWOG</p> <p>RG Data / Innovation Co-Ordinator</p> <p>Surveillance</p> <p>Marketing</p> <p>RGAP</p> <p>Social Science</p>	TBD - 6 months from commencement to completion	No





**Timeline – Implementation of Recommendations**

Recommendation	Crown’s Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
<p>steps in outreach to self-excluders who attempt to return to gambling at the venue.</p>	<p>This is a significant research project that requires thorough consideration and dedication of resources, possibly requiring significant external input.</p>	<p>ongoing discussions are taking place on how to extract the information.</p> <ul style="list-style-type: none"> <li>• Consultation with RGAP I members on acquiring a social science researcher.</li> </ul> <p>This is a longitudinal study requiring commitment of resources over some time.</p> <p>There are no substantive updates for this period. It is recommended that this is a lower priority.</p>	<p>Researcher</p> <p>Financial allocation required for Social Science Researcher</p>		
<p><b><u>Recommendation 8</u></b></p> <p>Crown should disseminate knowledge of the facial recognition tool and resulting actions against those who breach to the public.</p> <p>Analyses and dissemination of this data can be used to counter media and antigambling advocates who are unaware or misrepresent the effectiveness of responsible gambling interventions. It would also strategically enhance Crown’s reputation as a leader in this area.</p>	<p><b>Recommendation Accepted</b></p> <p><b>Linked to Recommendation 7.</b></p> <p>Reduce the number of Self Excluded/Excluded customers attempting to breach.</p> <p>Facilitate and reinforce the efficacy of the Self Exclusion.</p> <p><i>‘Research indicates that the likelihood of detection and embarrassment associated with being detected and escorted from a premise are two powerful deterrents from attempting breaches’ Page 57.</i></p>	<p>Part 1: <i>Crown should disseminate knowledge of the facial recognition tool</i></p> <ul style="list-style-type: none"> <li>• This may require an internal audit regarding the effectiveness of FRT at each property in detecting excluded persons.</li> <li>• Knowledge of the tool is currently disseminated to GH services to enable them to inform their clients.</li> <li>• All Self Excluding customers are informed of the FRT and the likelihood of detection (and the consequences) should they attempt to breach.</li> <li>• RGAs also reinforce the consequences for individuals who breach in reference to any subsequent application for revocation.</li> <li>• FRT and consequences of breaching is available on the RG websites.</li> </ul> <p>Part 2: Crown should disseminate operations of FRT and resulting actions against those who breach to the public.</p> <p><b>Update from 2 December 2020:</b></p> <p>The Security heads across the properties have indicated a strong preference not to promote the presence of Facial Recognition Technology, citing the potential for unintended consequences relating to criminality. The group was not adverse to the promotion of a camera network for detection of breaches. This will be further reviewed.</p>	<p>RGWOG</p> <p>RGA</p> <p>Surveillance</p> <p>RG Data / Innovation Co-Ordinator</p> <p>Marketing</p> <p>Community Panel (TBD)</p> <p>Stakeholders (TBD)</p> <p>Financial allocation may be required for Community Panel and Stakeholder engagement</p>	<p>TBD</p>	<p><b>No</b></p>

**Timeline – Implementation of Recommendations**

Recommendation	Crown’s Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
<p><b>Recommendation 9</b></p> <p>Each area of the casino and each shift should have a designated staff member, branded as "ambassador" in similar programs at other properties, who is highly trained in recognising, approaching and managing problem gambling behaviour and very visible to staff and patrons.</p>	<p><b>It is not recommended that Crown properties implement this recommendation.</b></p> <p>The spirit of the recommendation is encapsulated in the Responsible Gaming Advisor role, augmented by robust responsible gaming training.</p> <p>This has been discussed with RGAP members.</p>	<ul style="list-style-type: none"> <li>The appointment of ambassadors on the casino floor has been attempted previously at Crown Resorts.</li> <li>The implementation of this suggestion is useful in land-based casinos that do not have dedicated responsible gaming staff, such as Responsible Gaming Advisors.</li> <li>Crown Resorts’ referral model is designed to use the expertise of dedicated staff, which ensures a higher protection to customers.</li> <li>The concept of the recommendation is supported, whereby there is an increased presence of RGAs on the gaming floor.</li> <li>There is currently a review of procedures and processes that will free the RGAs from administrative functions to spend more time on the gaming floor, interacting with customers.</li> </ul>	<p>RGWOG</p> <p>RGA</p> <p>Gaming staff</p> <p>Promotional staff</p> <p>Financial allocation may be required for additional RG dedicated training lead and training costs</p>		
<p><b>Recommendation 10</b></p> <p>Crown should increase and diversify staff training to include not only the basic training for all floor staff and managers but also "booster" trainings every six months, retraining every year to two years, and advanced training on topics like reading non-verbal cues, assessing high risk behaviours and patron interactions for managers and employees on each shift who serve an ambassador function. All training materials and videos should also be available online, perhaps via an employee Intranet.</p>	<p><b>This recommendation is accepted in principle, however, will require considerable time to achieve the requisite review, consultation with relevant stakeholders (such as managers, Crown College) and subsequent implementation.</b></p> <p>The review may point to some modification of the recommendation regarding the operationalization of some suggested components.</p>	<p>CM and CS Responsible Gaming training was recently reviewed with oversight and approval by the each State’s Regulator.</p> <p>This recommendation will become part of the annual training review which is planned to commence Q1 FY22.</p> <p><b>Update from 2 December 2020:</b></p> <p>Crown Melbourne and Crown Sydney’s Responsible Gaming training was recently reviewed with oversight and approval being received by the relevant State Gaming Regulators. Crown Perth’s Responsible Gaming training is not reviewed by the State Regulator, however, was also recently reviewed. This recommendation will become part of the annual training review for all Australian Resorts, which is planned to commence in Q1 FY22.</p>	<p>RGWOG</p> <p>RGA</p> <p>RG dedicated training lead – currently GMs in all properties</p> <p>Gaming training lead</p> <p>Learning &amp; Development</p>	<p>December 2021</p>	<p>No</p>

*Timeline – Implementation of Recommendations*

Recommendation	Crown's Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
<p><b>Recommendation 11</b></p> <p>Key floor personnel should be tasked with raising awareness of brochures, information on gaming machines and/or other informational materials that are central to informed choice.</p>	<p><b>Recommendation Accepted</b></p> <p>That customers and staff are aware of familiar with the availability of printed information on responsible gaming to ensure customers have informed choice.</p>	<p><u>Recommendation is linked to Recommendation 9</u></p> <p>Discussion re procedural details has commenced – coordination across all properties required.</p> <p>General Managers Responsible Gaming (GMRG) to operationalise. This Recommendation can be combined with Recommendation 9 and absorbed by the ambassador personnel.</p> <p>There are no substantive updates for this period.</p>		July 2021	No
<p><b>Recommendation 12</b></p> <p>Information available in brochure form (e.g., how to self-exclude) should also be available through websites both within and external to the casino and using dynamic displays; it should also include information targeting cognitions and beliefs as well as factual information about the games.</p>	<p><b>Recommendation Accepted</b></p> <p><b>Brochures currently available through both CP and CM website and will be at CS.</b></p> <p>Content information re cognitions, beliefs and information re games to be included in brochures.</p>	<p>Information targeting cognitive beliefs and odds of winnings and rules of the games are under review for inclusion in RG brochures. Brochures will be modelled off CP and CS's existing brochures, with the inclusion of cognitive beliefs.</p> <ul style="list-style-type: none"> <li>• Discussion re procedural details has commenced – coordination across all properties required.</li> <li>• Re. external websites – consultation with GH Services to commence.</li> <li>• Content of brochures (re. cognitions, beliefs and information re games) under review by RGPs.</li> </ul> <p><b>Update from 2 December 2020:</b></p> <p>Responsible Gaming Psychologists have commenced the brochure review.</p>	<p>Discussion with VRGF</p> <p>RGWOG</p> <p>Digital Marketing</p> <p>IT</p> <p>Gaming</p> <p>Legal</p>	July 2021	No
<p><b>Recommendation 13</b></p> <p>Crown should consider:</p> <p>1) instituting limit-setting for EGMs in Perth, analogous to those required in Victoria, and</p> <p>2) working with Victoria to access and evaluate the data in Melbourne and, subsequently, in Perth to identify characteristics of limit-setters, patterns aligned with raising and/or lower limits or switching</p>	<p><b>Recommendation Partially Accepted</b></p> <p><b><u>#NOTE: Limit-setting (PSL) is available on EGMs at CP – RGAP has been advised by SB.</u></b></p> <p>To allow for a comparison between 'casual' patrons and 'regular' customers. That pre-commitment at CP be introduced to mimic CM so that statistical evaluation can be made across the two sites.</p>	<p>CP, CM and CS GMRG in consultation with one of the RGAP Members to establish how responsible gaming policies at Crown would be informed.</p> <p>There are no substantive updates for this period. It is recommended that this is a lower priority.</p>	RGWOG	TBD	No

**Timeline – Implementation of Recommendations**

Recommendation	Crown's Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
limit types, and accelerations in patterns of expenditure.	CS will also have available Play Safe Limits.				
<p><b>Recommendation 14</b></p> <p>Warnings or pop-up messages should be discrete, visible only to the player and not passers-by; that limits/defaults and changes to limits be accomplished by smart phone or other web-based means that would reduce stigma to the player; and that Crown devise an educational tutorial that clarifies the relationship of time/money expenditures to risk factors for problem gambling.</p>	<p><b>Recommendation Accepted</b></p> <p>Reduce stigma associated with 'labelling' gambling behaviour – this can influence more customers experiencing difficulties to seek help.</p>	<p><b>Recommendation linked to Recommendation 4</b></p> <p>Re. educational tutorial – consultation with relevant Crown staff has begun.</p> <ul style="list-style-type: none"> <li>• Technical resources to be allocated.</li> <li>• Development of the Tutorial should include consultation with GH community educators and counsellors.</li> <li>• Identification of potential contributors underway.</li> <li>• Financial contribution may be required for development of software (external).</li> </ul> <p>There are no substantive updates for this period. It is recommended that this is a medium priority.</p>	<p>RGWOG (Project managers)</p> <p>Gaming Machines</p> <p>Gaming Product Team</p> <p>Digital Marketing</p> <p>IT and IT Governance</p> <p>Legal / Compliance</p> <p>State Regulators</p> <p>VRGF</p> <p>RGAP</p>	TBD - 6 months from commencement to completion	No
<p><b>Recommendation 15</b></p> <p>Crown Model <i>Initially benchmarked to predict self-excluders, the Panel feels strongly in offering...</i></p> <p>The program should, instead, identify marked changes in play patterns with regard to factors such as time spent gambling and/or gambling sessions, money expenditures, variations in bet size and frequency, increases in overall time at venue and number of games played.</p>	<p><b>Recommendation Accepted</b></p> <p>This initiative proposes a model to establish an algorithm to detected problem gambling behaviour (rather than the previous Crown Model which attempted to predict self-excluders).</p> <p>The recommendation is that Crown use data develop a model to identify at risk gamblers</p>	<p><b>Recommendation linked to Recommendation 16</b></p> <p>Consideration is being given to members of a working party to determine important behaviours/factors to include.</p> <ul style="list-style-type: none"> <li>• In discussion with the RGAP it was suggested that Crown persist despite significant limitations until there is enough data and review the value of the model at that point.</li> <li>• Consideration should be given to having the RGAP participate in meetings and review progress in order to move definitively in a direction that will yield significant value.</li> <li>• CM is currently scoping a Proof of Concept to develop a version to test/validate alongside the current Crown Model.</li> </ul> <p>There are no substantive updates for this period.</p>	<p>RGWOG (project managers)</p> <p>RG Data / Innovation Co-Ordinator</p> <p>Marketing Strategy</p> <p>IT</p> <p>RGAP</p>	TBD - Project to continue over 18 months	No
<p><b>Recommendation 16</b></p> <p>Suggests that data should then be used to inform a future</p>	<b>Recommendation Accepted</b>	<p><b>Recommendation linked to Recommendation 15</b></p> <p>There are no substantive updates for this period.</p>		TBD	No

*Timeline – Implementation of Recommendations*

Recommendation	Crown's Response and Objectives	Proposed Action/Progress Update	Required Resources	Target/Action Dates	Completed Yes/No
model for identifying at-risk gamblers, perhaps according to a system that assigns colours to risk levels (e.g., green-yellow-red).					
<p><b>Recommendation 17</b></p> <p>The Responsible Gaming Customer Centre should be expanded to include additional office rooms where customers can be interviewed in private and in a manner conducive to confidentiality.</p>	<p><b>Recommendation Accepted</b></p> <p>To protect the privacy and Confidentiality of customers in the RG facilities. Improved facilities will enhance outcomes and reduces risk to customers by encouraging openness and the likelihood of contact if problems with gambling arise.</p>	<p><b>#NOTE: The RGAP was provided with images of CP RGC following receipt of the draft report.</b></p> <p>Responsible Gaming Centre (RGC) facilities (at CM) should be expanded to include additional office rooms where customers can be interviewed in private and in a manner conducive to confidentiality. Not currently budgeted for FY22.</p> <p>CP RGC requires significant expansion – this has been budgeted to commence April 2021.</p> <p><b>Update from 2 December 2020:</b></p> <p>Crown Perth has scoped the development of a new Responsible Gaming Centre.</p>	<p>Executive Team</p> <p>Financial Controller</p> <p>CP and CM GMRG</p> <p>RGWOG</p> <p>Projects</p> <p>Capital allocation approved</p>	<p>CM – TBD</p> <p>CP – Q4 FY21</p>	No



**AGENDA ITEM 4:**  
Australian Resorts



# Australian Resorts Responsible Gaming Report

## February 2021

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4.1

## 1. Australian Resorts Key Updates

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### Responsible Gaming Advisory Panel

Work on the Responsible Gaming Advisory Panel's (**Panel**) review of the Crown Resorts Responsible Gaming Framework and Strategy Report and Recommendations is continuing with a detailed update on the progress against each of the Recommendations included at Agenda Item 3.

Crown is also working with the Panel in relation to the collection of data (and analysis of that data) in preparation for the Seventh Review of the Casino Operator and Licence by the Victorian Commission or Gambling and Liquor Regulation (**VCGLR**).

### Play Periods

'Play Periods' is the term employed to describe the policy and process in relation to the period of time a domestic customer is recorded as being in the casino from the first recorded event, and any subsequent action taken in relation to the length of time that customer is in the casino, combined with any 'time on device'. The predominant process measure for Play Periods is the record of Loyalty Program card events, however, employee observation is also utilised.

Play Periods for all Australian Resorts have been reviewed and subsequently reduced. The maximum time a customer is permitted to be onsite gaming has been determined at 18 hours (down from 24 hours). The Responsible Gaming Department has set parameters where the team and Gaming departments are alerted to Play Periods exceeding 12 hours to allow for observation or intervention, as or when required.

Changes to Play Periods have been implemented at both Crown Melbourne and Crown Perth.

### Crown Resorts Responsible Gaming Policy

In line with the project of the development of Crown Group Policies, a Group wide Responsible Gaming Policy was developed for Crown's Australian resorts which is based on the former Crown Melbourne Responsible Gaming Policy.

A copy of the Responsible Gaming Policy is included at Agenda Item 4.3 for the Committee's consideration.

### Crown Melbourne – Sixth Review of the Casino Operator and Licence, June 2018

Crown Melbourne has to date responded to, and made submissions for 9.5 of the 11 Responsible Gaming Recommendations (which includes Recommendation 12 in relation to Facial Recognition Technology). A detailed update on the progress made against each of the Recommendations is included at Agenda Item 5.

The work required for Recommendation 9, pertaining to an independent assessment of the real-time player data analytics tool for carded play to be completed 12 months after the introduction, will be postponed to allow for sufficient time and data to appropriately analyse the efficacy. Compliance and Responsible Gaming department representatives have met with the VCGLR to discuss the framework for the change in delivery date of the assessment, including VCGLR expectations of content. The VCGLR has now provided guidance as to the expected content of Crown Melbourne's



submission for Recommendation 9. The expectations provided by the VCGLR include detail on the methodology and processes, the suitability of parameters and the effectiveness in proactively identifying risk in assessing both the Crown Model and Play Periods. Both the Responsible Gaming Psychologist and the Panel Chair are assisting with the submission and briefing of the potential assessors.

#### **Crown Melbourne Casino re-opening – Impact on Responsible Gaming**

Since the commencement of the limited gaming operations at Crown Melbourne on Thursday, 12 November 2020, the Responsible Gaming Centre was open during gaming opening hours as well as some additional hours. Typically, this was from 0800hrs – 0000hrs, with a minimum of one Responsible Gaming Advisor (**RGA**) and three RGAs during gaming availability.

As advised to the VCGLR, all RGAs returned to cover the full rostering requirements once the operating restrictions eased and Crown Melbourne moved to 24 hour opening times, from Wednesday, 25 November 2020.

On re-opening, as was implemented at Crown Perth, the Responsible Gaming department initiated a patron survey. Salient information was gathered from customers accessing the Responsible Gaming Centre (through self exclusion and revocation follow ups, applicants for revocation of exclusion and general responsible gaming customer contact where appropriate). The purpose was to leverage the forced break from gambling that our customers have experienced, which provided Crown with a (possibly unique) opportunity to gain some practical understanding of how patrons managed themselves through this period of time. The survey collection ceased on 1 January 2021, 33 surveys were completed and will be reviewed.

#### **Website statistics**

Attached at the end of this paper are the website statistics on the Responsible Gaming webpage downloads on each of Crown Melbourne and Crown Perth’s websites.

## 2. Tables and Statistics

### 2.1. General Property Updates

UPDATE	CROWN MELBOURNE	CROWN PERTH	CROWN SYDNEY
INITIATIVES AND ACTIVITIES	<ul style="list-style-type: none"> <li>The Gaming Machines department has commenced the <i>Conducting Low Level Observations to Monitor Responsible Gaming</i> initiative. All Gaming Machine employees are actioning and recording outcomes of customer observations that are considered low level potential problem gambling indicators. These are passed onto Responsible Gaming either contemporaneously depending on the level observed, or via electronic records within an agreed time frame. This initiative will continue to drive a responsible gaming culture and proactive customer contact.</li> <li>As part of the Self Exclusion Revocation review and update, Responsible Gaming has commenced the availability of Self Exclusion and Revocation Application forms via the Crown Melbourne webpage.</li> <li>Crown Melbourne's review of the Self Exclusion and Involuntary Exclusion Revocation process as well as the</li> </ul>	<p>The Responsible Gaming Centre closed at 1700hrs, 31 January 2021, in line with the Western Australian Government health directives. At this stage, the Centre is expected to re-open at 1800hrs, 5 February 2021.</p>	<ul style="list-style-type: none"> <li>The final two RGAs have commenced, bringing the Sydney team to its full complement of seven RGAs.</li> <li>Drake Workwise, the Third Party Service Provider required under legislative obligations, will commence service delivery for the provision of clinical support to the Crown Sydney Responsible Gaming Centre from February 2021.</li> <li>The Sydney RGA team continues to utilise the pre-opening period for structured training, employing a broad range of learning modules online and face to face, with internal and external providers.</li> </ul>

	<p>Revocation Committee, has been completed. Updates to the process and Charter now align with Crown Perth's recent change following a similar review, achieving greater synergies across all Australian Resorts.</p> <ul style="list-style-type: none"> <li>The Responsible Gambling Ministerial Advisory Council (<b>RGMAC</b>) held one meeting in the reporting period on 3 December 2020, which focused on the discussion of the Work Plan for 2021. There are two items that will be considered by the RGMAC for 2021, which are <i>Improving the regulation of wagering advertising</i> and inducements and <i>Simulated Gambling</i>. Crown Melbourne has requested it be part of the working groups.</li> </ul>																	
<b>REGULATORY</b>	<ul style="list-style-type: none"> <li>As part of returning to work on the re-opening of Crown, all operational gaming staff completed Responsible Gaming refresher training.</li> <li>Responsible Gaming Advanced Training has been delivered to over 300 Gaming Area Managers to coincide with re-opening of gaming and in line with Recommendation 6 of the VCGLR's Sixth Casino Review. All other senior operational management from both</li> </ul>	<ul style="list-style-type: none"> <li>The following data has been provided to the Gaming and Wagering Commission of WA: <table border="1" data-bbox="1003 1023 1451 1303"> <tr> <td data-bbox="1003 1023 1084 1303">Nov 2020</td> <td data-bbox="1084 1023 1384 1066">Third Party Referrals</td> <td data-bbox="1384 1023 1451 1066">5</td> </tr> <tr> <td></td> <td data-bbox="1084 1066 1384 1155">Concerning Behaviour Reports from licensed casino employees</td> <td data-bbox="1384 1066 1451 1155">75</td> </tr> <tr> <td></td> <td data-bbox="1084 1155 1384 1244">Concerning Behaviour Reports from other non-licensed casino employees</td> <td data-bbox="1384 1155 1451 1244">3</td> </tr> <tr> <td></td> <td data-bbox="1084 1244 1384 1287">Self Exclusion Applications</td> <td data-bbox="1384 1244 1451 1287">27</td> </tr> <tr> <td></td> <td></td> <td data-bbox="1384 1287 1451 1303">20</td> </tr> </table> </li> </ul>	Nov 2020	Third Party Referrals	5		Concerning Behaviour Reports from licensed casino employees	75		Concerning Behaviour Reports from other non-licensed casino employees	3		Self Exclusion Applications	27			20	<ul style="list-style-type: none"> <li>The GM Responsible Gaming and the GM Compliance and Integrity, have met with the Independent Liquor and Gaming Authority (<b>ILGA</b>) Casino Compliance Operations Team Leaders, who have responsibility for the staffing of the Crown Sydney ILGA office on-site. Included in the meeting was discussion in relation to Responsible Gaming signage and a visit to the Responsible Gaming Centre.</li> </ul>
Nov 2020	Third Party Referrals	5																
	Concerning Behaviour Reports from licensed casino employees	75																
	Concerning Behaviour Reports from other non-licensed casino employees	3																
	Self Exclusion Applications	27																
		20																

	Gaming departments have also participated in this training.		Self Exclusion Breaches		
		Dec 2020	Third Party Referrals	4	
			Concerning Behaviour Reports from licensed casino employees	70	
			Concerning Behaviour Reports from other non-licensed casino employees	1	
			Self Exclusion Applications	25	
			Self Exclusion Breaches	12	
		Jan 2021	Third Party Referrals	6	
			Concerning Behaviour Reports from licensed casino employees	86	
			Concerning Behaviour Reports from other non-licensed casino employees	2	
			Self Exclusion Applications	31	
			Self Exclusion Breaches	8	
<b>PATRON FEEDBACK / MATERIAL PATRON ISSUES</b>	<ul style="list-style-type: none"> <li>No comments were received.</li> </ul>	<ul style="list-style-type: none"> <li>No comments were received.</li> </ul>	<ul style="list-style-type: none"> <li>One person has requested to self-exclude from Crown Sydney prior to the casino opening. Following consultation with ILGA, the person was requested to do so again upon commencement of gaming operations at Crown Sydney (no gaming boundary has yet been approved).</li> </ul>		
<b>INTERNAL AND OTHER AUDIT AND</b>	<ul style="list-style-type: none"> <li>Internal Audit Activity in this period consisted of the typical spot audits completed by Gaming Audit and ongoing audits by the Responsible Gaming Teams,</li> </ul>	<ul style="list-style-type: none"> <li>Fortnightly audits of Responsible Gaming collateral across the casino gaming floor</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>		

<b>COMPLIANCE ACTIVITY</b>	with no significant issues requiring follow up. <ul style="list-style-type: none"><li>• Internal Audit commenced the full Responsible Gaming Audit in January 2021.</li></ul>	were conducted, with no significant issues requiring follow up.	
<b>THIRD PARTY EXCLUSION</b>	<ul style="list-style-type: none"><li>• No applications were received and no exclusions were issued.</li></ul>	<ul style="list-style-type: none"><li>• Six applications were received (December x 3 and January x 3).</li></ul>	<ul style="list-style-type: none"><li>• N/A</li></ul>

## 2.2. Self Exclusion and Revocation Statistics

Note – Crown Melbourne ceased gaming trade 23 March 2020 and re-opened all gaming (limited) 25 November 2020; Crown Perth ceased gaming trade 23 March 2020 and re-opened all gaming (limited) 27 June 2020

### (a) Total Statistics (as at 31 January 2021)

TOTAL	CROWN MELBOURNE (SINCE 1994)	CROWN PERTH (SINCE 1985)
Current Self Excluded	4971 <sup>1</sup>	2822
Current Cross Property Self Excluded	1145 <sup>2</sup>	1145
<b>Total Current Self Excluded</b>	<b>6115<sup>3</sup></b>	<b>3967</b>
Total Revocations	800	875

### (b) Self Exclusion Statistics (Financial Year Comparison)

	FY18		FY19		FY20		FY21 TD	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Self Exclusions	358	278	225	130	1	5	0	1
Joint Self Exclusions	16	9	3	5	-	-	-	-
Cross Property Self Exclusions*	-	-	215	111	402	199	59	170
Detected Self Exclusion Breaches	2581	576	2445	603	1114	585	290	293
Attempted Self-Exclusion Breaches**	93	-	599	17	828	85	162	286

\*Cross Property Self Exclusion (CPSE) recorded from 1 January 2019

\*\*Attempted breaches recorded from 7 April 2018

<sup>1</sup> Deduction of an Approved Revocation (Joint Self Exclusion) that was issued at Crown Perth.

<sup>2</sup> Discrepancy due to Crown Perth Self Exclusion being included in the August count of Cross Property Self Exclusions and deduction of 9 Approved Revocations (Cross Property Self Exclusions).

<sup>3</sup> A customer was issued with a CPSE from Perth whilst already subject to Crown Melbourne Self Exclusion. To avoid double counting, Total Current Self Excluded will be one less than the sum of Current Self Excluded and Current Cross Property Self Excluded.

(c) **Detected Self Exclusion Breaches (1 November 2020 – 31 January 2021)**

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Total Breaches	0	20	122	23	171	31
Total Persons	0	20	104	22	130	26
Persons with Unique breaches	0	20	91	21	107	21
Persons with multiple breaches	0 person totalling 0 breaches	0 person totalling 0 breaches	13 persons totalling 30 breaches	1 person totalling 2 breaches	23 persons totalling 64 breaches	5 person totalling 10 breaches
Total attempted breaches*	1	20	84	13	77	11

\*Attempted breaches recorded from 7 April 2018

(d) **Revocation Statistics (Financial Year comparison)**

	FY18		FY19		FY20		FY21 TD	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Applications Received	66	124	76	111	73	97	27	128
Applications Approved	50	102	55	81	52	66	19	66
Applications Declined	16	12	21	30	21	31	8	46

(e) **Revocation Statistics (1 November 2020 – 31 January 2021)**

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Applications Received	0	15	18	23	9	27
Applications Approved	0	9	12	12	7	12
Applications Declined	0	6	6	4	2	7

**(f) Approved Revocation Statistics (Financial Year comparison)**

	FY21 TD
	Melbourne Perth
Approved Revocations (Cross Property Self Exclusion)	9
Approved Revocations (Joint Self Exclusion)	1

**(g) Welfare Statistics (Financial Year comparison)**

	FY18		FY19		FY20		FY21 TD	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Welfare WOL Issued	35	-	67	-	63	-	3	-
Welfare NRL/26.2 Banning Issued*	-	30	-	35	-	46	-	34

\*Included Third Party Exclusions as at EOFY19



## (h) Third Party Exclusion (Financial Year comparison)

	FY18		FY19		FY20		FY21 TD	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Third Party Applications Received	-	-	-	8	4	13	0	11
Third Party Applications Declined	-	-	-	0	0	0	0	0
Third Party Applications Approved	-	-	-	8	4	12	0	7
Patron Self Excluded	-	-	-	1	0	3	0	3
Ban Issued	-	-	-	4	4	6	0	0
Application Closed	-	-	-	2	0	2	0	2
Application Withdrawn by Applicant	-	-	-	1	0	0	0	1
Application Outcome Pending	-	-	-	0	0	2	0	3

## (i) Time Out Statistics (1 November 2020 – 31 January 2021)

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
3-month Time Out issued	0	0	0	0	3	1
6-month Time Out issued	0	0	1	0	4	1

### 2.3. Unattended Children Statistics

#### (a) Unattended Children Statistics (Financial Year comparison)

	FY18		FY19		FY20		FY21 TD	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Unattended Children Incidents	75	92	91	97	81	66	7	23

#### (b) Unattended Children Statistics (1 November 2020 – 31 January 2021)

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Crown Towers	0	1	0	0	2	1
Crown Metropol	0	3	0	2	0	2
Crown Promenade	0	0	0	0	0	0
Complex	0	0	4	1	1	1
Car Park	0	0	0	0	0	0
<b>Total Incidents</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>3</b>	<b>4</b>
<b>Total Bans Issued*</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>
<b>Total Warnings Issued*</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>5</b>
Gaming Related*	0	6	0	0	2	2
Non-Gaming Related*	0	0	5	4	2	3

\* Indicates total individuals

## 2.4. Training

1 November 2020 – 31 January 2021

Type	Crown Melbourne # of employees	Crown Perth # of employees	Crown Sydney # of employees
Induction/Orientation	Nov: 0 Dec: 0 Jan: 20	Nov: 202 Dec: 214 Jan: 43	(Sep/Oct: 213) Nov: 842 Dec: 111 Jan: 57
Senior Manager/Advanced	Nov: 329 Dec: 115 Jan: 23	N/A	Nov: 40 Dec: 56 Jan: 0
Certificate III Hospitality RSG/RCG	Nov: 0 Dec: 0 Jan: 0	Nov: 0 Dec: 0 Jan: 0	Nov: 0 Dec: 0 Jan: 0
Other	<b>Gaming Machines Additional Focus</b> Nov: 0 Dec: 9 Jan: 0	<b>Security</b> Nov: 3 Dec: 5 Jan: 4  <b>Dealer</b> Nov: 4 Dec: 0 Jan: 0	



# Crown Monthly RSG report

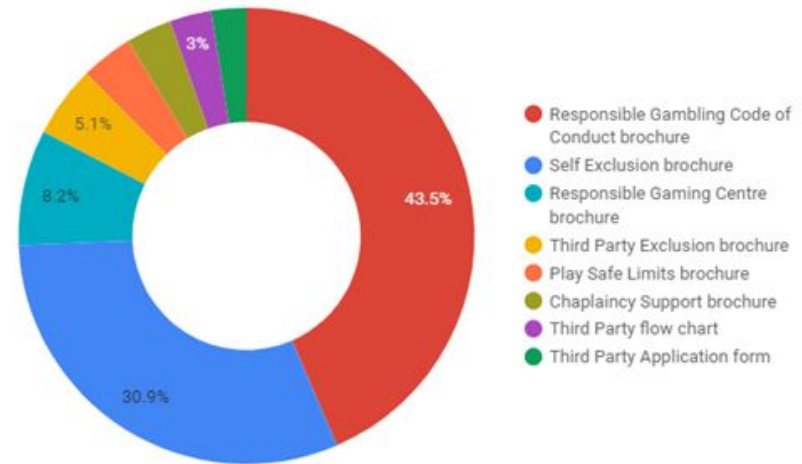
## Melbourne

1 Sept 2020 - 31 Jan 2021

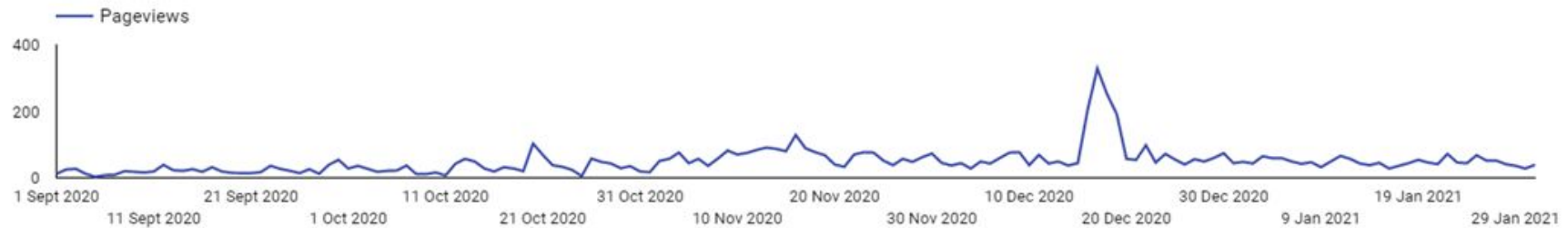
### Responsible Gaming PDF Downloads

PDF Downloaded	# of Downloads
Responsible Gambling Code of Conduct brochure	351
Self Exclusion brochure	249
Responsible Gaming Centre brochure	66
Third Party Exclusion brochure	41
Play Safe Limits brochure	30
Chaplaincy Support brochure	26
Third Party flow chart	24
Third Party Application form	20
<b>Grand total</b>	<b>807</b>

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### Number of times all RSG pages were viewed





# Crown Monthly RSG report

## Perth

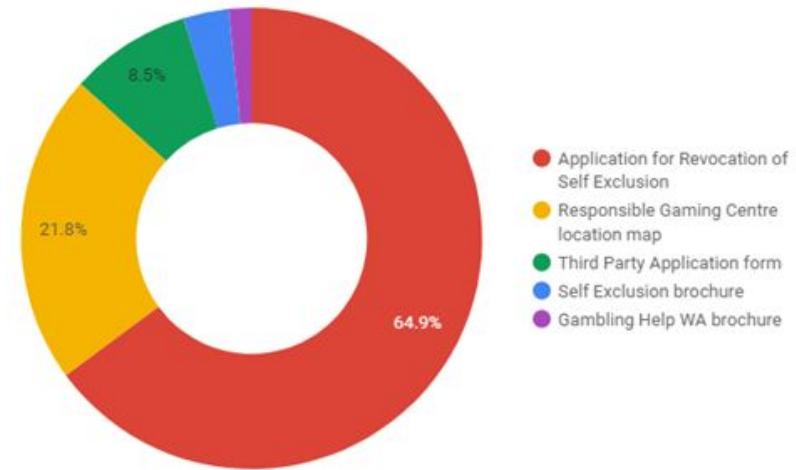
1 Sept 2020 - 31 Jan 2021

### Responsible Gaming PDF Downloads

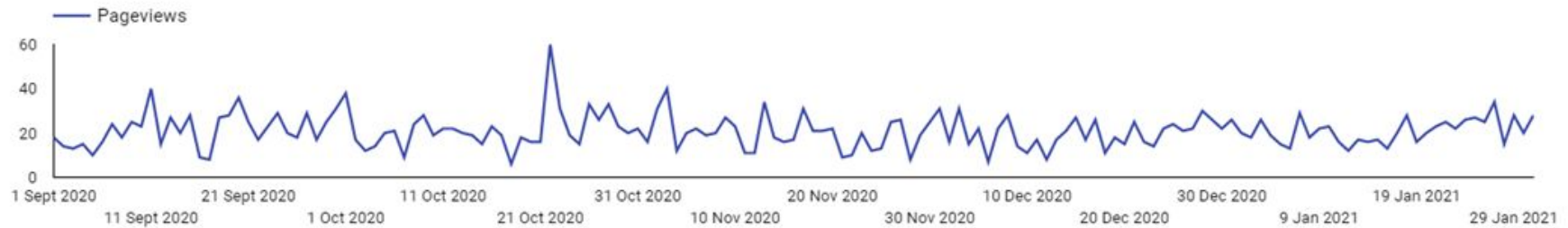
PDF Downloaded	# of Downloads
Application for Revocation of Self Exclusion	122
Responsible Gaming Centre location map	41
Third Party Application form	16
Self Exclusion brochure	6
Gambling Help WA brochure	3

Grand total 188

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### Number of times all RSG pages were viewed





## Crown Melbourne Responsible Gaming

### Statistic Explanation

#### Harm Minimisation Overview

##### 1.1 Total Patron Contact with RGC (Responsible Gaming Centre)

This comprises all entries from the Responsible Gambling Register, which records program and service information. The Admin Services section refers to those entries that are administrative such as change of address.

##### 1.2 Main Activities of RGC Staff

This denotes the top five activities Responsible Gaming staff engage in. Note that Facial Recognition Technology was implemented in February 2018. Additionally, changes in the Play Periods technology and process commenced from late 2018.

##### 1.3 Services by Harm Minimisation Categories

The then Responsible Gaming Operations Manager and Responsible Gaming Psychologists worked to categorise the various activities recorded in the Responsible Gambling Register. These are defined by the following harm minimisations categories:

Harm minimisation category	Main activities
Exclusion Related events	Includes Self exclusions issued, breach and attempted breach of self exclusion, Time Outs issued, Time Outs breached, Bans issued and Third Party Exclusion issued
Initiating intervention	Includes Gaming Machines, Table Games, staff interaction and Fully Automated Table Games focus, Observable signs, Exclusion/Revocation follow up
Responding to Information	Includes Self exclusion and Third Party Exclusion inquiries, Revocation information, Missing persons, Unattended Children
Service and Assistance	Includes Counselling, Chaplaincy, Counselling information, Revocation contact

Excludes Play Periods as the volumes would affect the visual representation. These are depicted in 1.2.

#### 1.4 Referral from Crown Staff and Customers/Other

The 'Internal RG' category incorporates activities that are initiated by Responsible Gaming staff such as proactive presence on the gaming floor (includes Gaming Machines, Table Games, staff interaction and Fully Automated Table Games focus), program follow up, observable signs and welfare follow up. The other 'Internal' staff categories are referrals from gaming machines, table games, security, surveillance, hotel staff etc. 'External' referrals are mainly where customers have 'referred' themselves.

Excludes Play Periods as the volumes would affect the visual representation. These are depicted in 1.2.

#### 1.5 External Service Providers Referred To

In these, 'Gambler's Help Facility' denotes the direct referral to the Gambler's Help offices such as Southern, City, Northern et al; 'Gambler's Help TeleServ' means the customer was referred to the 24/7 telephone counselling service; and 'Other' refers to specialised services including Chinese Peer Connection, Australian Vietnamese Women's Association, other industry Self Exclusion Programs and law enforcement (such as in the case of Missing persons).

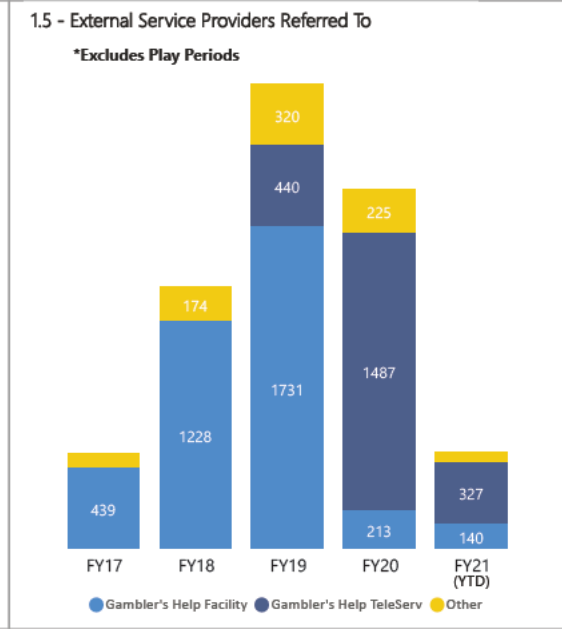
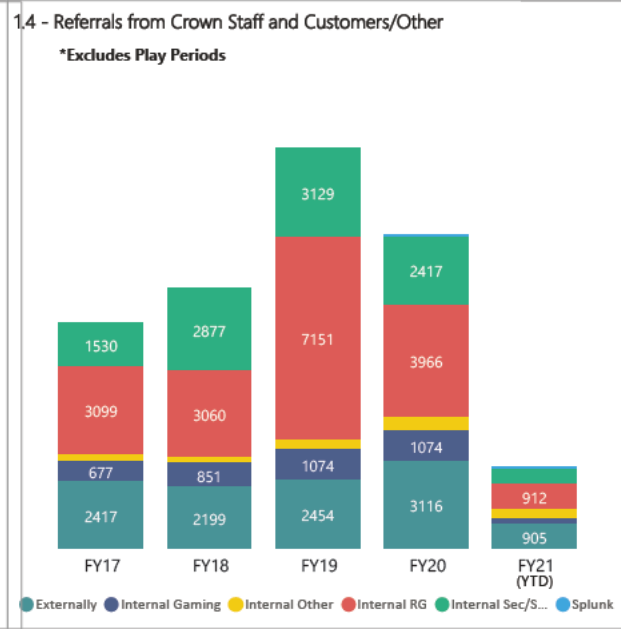
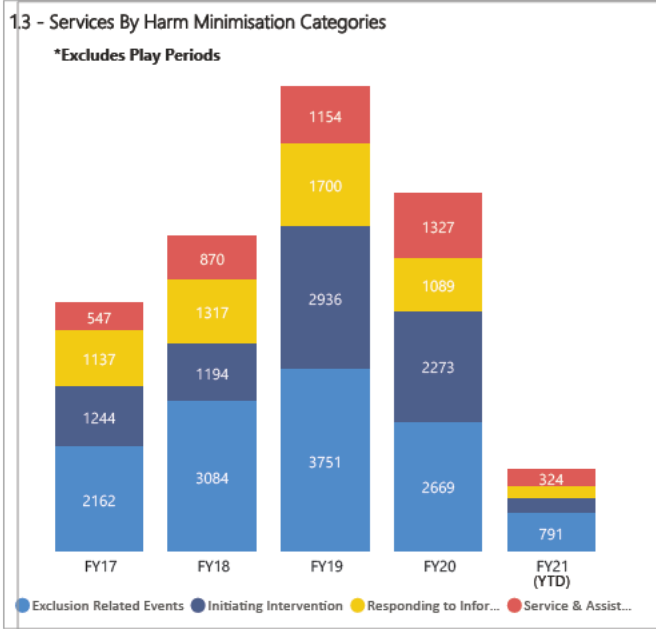
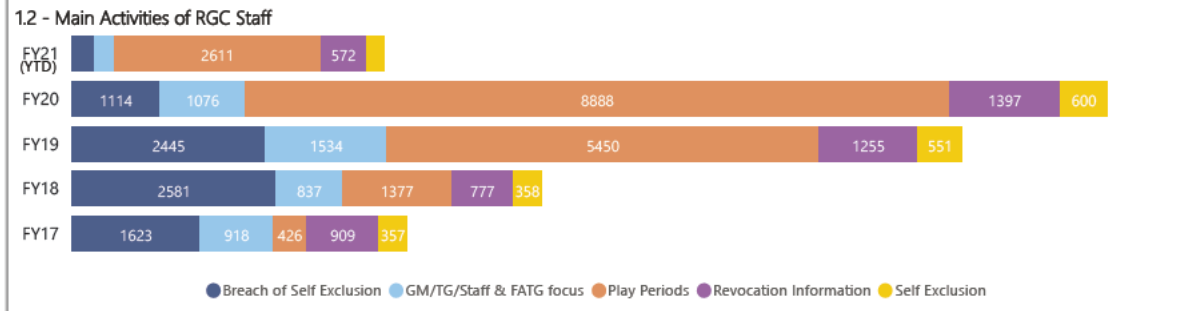
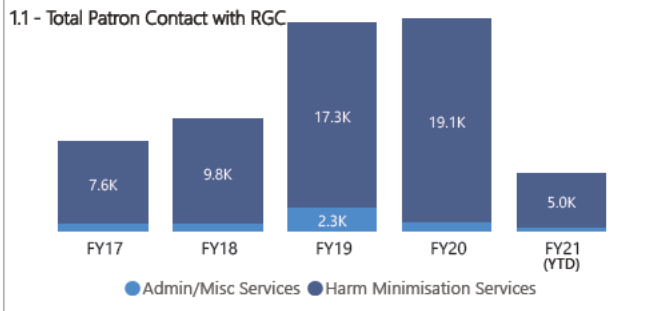
#### Exclusion Related Events

**Data Follow up** - Relates to the conversations initiated by the Responsible Gaming Advisors on information provided by the Customer Analytics team as part of the Crown Model Trial.

**Appeals Financial Year Comparison** – Relates to Self Exclusion Appeals received by the VCGLR and the status, either upheld, declined or pending.

The rest of the tables are a visual representation of the data contained in Section 2.2 (Self Exclusion and Revocation Statistics) of the Australian Resorts Responsible Gaming Report.

**responsible gaming - Harm Minimisation Overview**  
AWARENESS. ASSISTANCE. SUPPORT







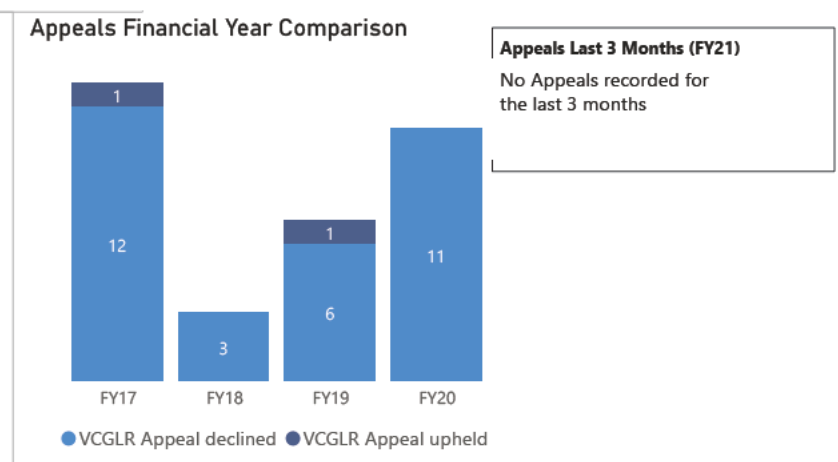
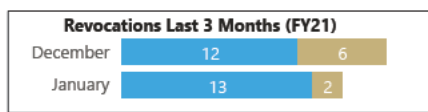
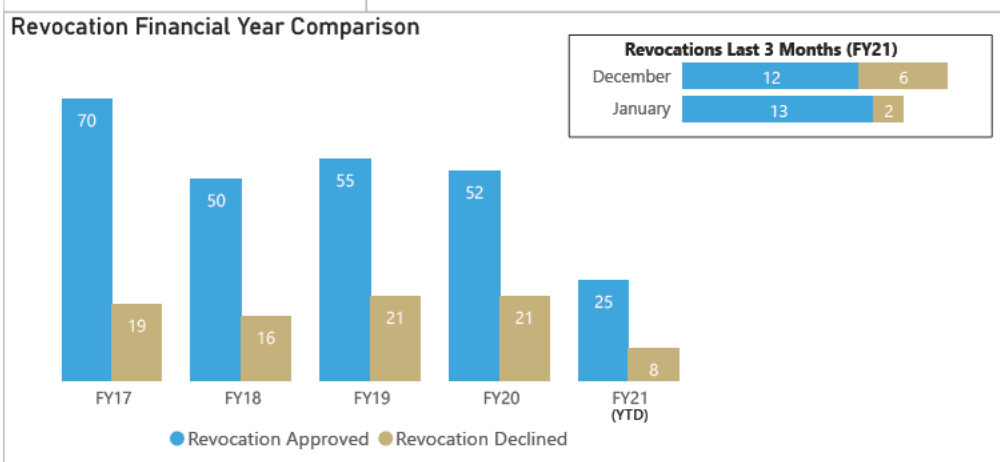
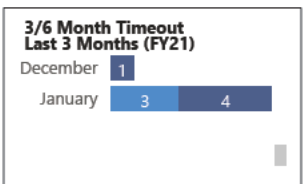
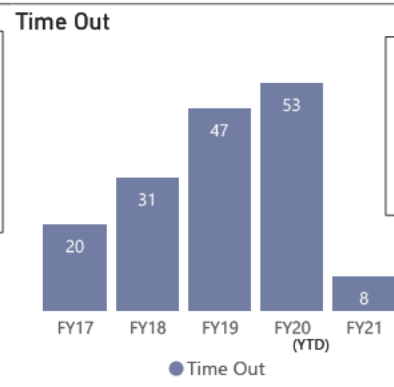
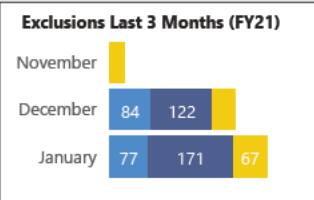
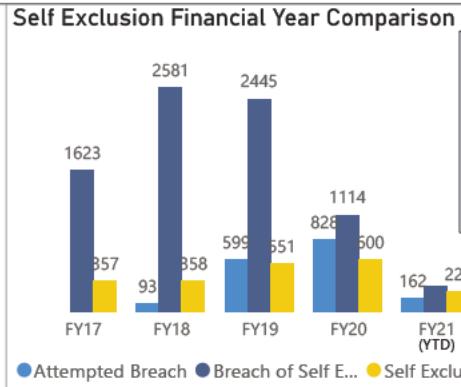
**responsible gaming** - Exclusion Related Events  
AWARENESS. ASSISTANCE. SUPPORT

Total Statistics (as at 31st January 2021) *Since 1994	<b>4971*</b> Current Self Excluded	<b>1145</b> Current Cross Property Self Excluded	<b>6115*</b> Total Current Self Excluded	<b>800*</b> Total Revocations
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**Customer Follow Up Related to Crown Model Data**

**Last 3 Months (FY21)**

No Data Follow up recorded in the last 3 months



**Appeals Last 3 Months (FY21)**

No Appeals recorded for the last 3 months



## Responsible Gaming Committee

### Memorandum

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**To:** Responsible Gaming Committee

**From:** Sonja Bauer

**Date:** 4 February 2021

**Subject:** **Responsible Gaming Policy**

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Dear Committee Members

The purpose of this paper is to present the Committee with a Crown Resorts Responsible Gaming Policy for recommendation to the Board for approval.

With the opening of Crown Sydney in 2020, the Compliance and HR teams embarked on a project to create group policies where appropriate, which apply to Crown's Australian resorts. In the past, Crown Melbourne and Crown Perth typically had distinct policies which applied at each property.

In reviewing the Crown Melbourne Responsible Gaming Policy, which has been in effect since 2006, it was determined that this be converted into a group policy as the Responsible Gaming team operates as a Group function. A group Policy was uploaded to the intranet site at each of Crown's Australian Resorts in December 2020.

The Policy has been further refined and it is proposed that the Committee consider the Policy, and subject to any feedback from the Committee, recommend the Policy for approval by the Board.

Attached for the Committee's review is a draft Crown Resorts Responsible Gaming Policy.

#### **Proposed Resolution**

It was **RESOLVED** that the Crown Resorts Responsible Gaming Policy be recommended to the Board for approval.

Kind regards

Sonja Bauer  
**Group General Manager Responsible Gaming**



# Crown Resorts Limited Responsible Gaming Policy

Crown Resorts Limited ACN 125 709 953  
A public company limited by shares

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## 1. Background

### 1.1. Purpose

The purpose of this Policy is to outline Crown's commitment to minimise harm by providing gaming services in a responsible manner and to complying with relevant laws and industry standards to ensure gaming services are delivered responsibly. Crown recognises that some customers may experience difficulties associated with their gaming behaviours and provides services and programs for both customers and employees to support them.

### 1.2. Application of this Policy

This Policy applies to all employees and contractors of a Crown Group Business.

### 1.3. Definitions

**Crown** means Crown Resorts Limited ACN 125 709 953.

**Crown Group Business** means Crown and:

- (a) Crown Melbourne casino and entertainment complex, operated by Crown Melbourne Limited;
- (b) Crown Perth casino and entertainment complex, operated by Burswood Nominees Ltd; and
- (c) Crown Sydney, operated by Crown Sydney Gaming Pty Ltd and Crown Sydney Property Pty Ltd.

## 2. Commitment

Each Crown Group Business is committed to:

- minimising gaming-related harm and providing gaming in a responsible manner;
- the provision of responsible gaming programs and services for customers, employees and contractors through an extensive Responsible Gaming framework;
- deploying Crown's responsible gaming message, 'Awareness Assistance Support';
- ensuring compliance with relevant regulation and industry standards to deliver gaming programs and services responsibly and in accordance with the intent of regulations and standards;
- operating a Responsible Gaming Code of Conduct;
- maintaining Responsible Gaming Centres which provide a range of responsible gaming support services and programs to customers and other relevant stakeholders;
- supporting employees and contractors with gaming behaviours, including through the availability of an Employee Assistance Program;
- engaging with relevant external stakeholders, including regulators, peak bodies and help and support services; and

- consulting with responsible gaming subject matter experts and professionals.

### 3. Expected Behaviours

Employees and contractors of a Crown Group Business must:

- undertake Responsible Gaming training;
- comply with this Policy, the Responsible Gaming Code of Conduct and Crown's Gambling by Employees Policy; and
- not knowingly allow a person who is in a state of intoxication to gamble or bet at a Crown Group Business.

### 4. Breaches of Policy

A breach of this Policy may result in disciplinary action up to and including termination of employment.


If you believe that another person within a Crown Group Business is not complying with this Policy, you are encouraged to raise this with your immediate supervisor or human resources manager in the first instance. If you are uncomfortable with this or are not satisfied with their response, you can report a breach to STOPLine, Crown's independent and confidential service, or otherwise in accordance with Crown's Whistleblower Policy.

### 5. Review of Policy

Crown, through its Responsible Gaming Committee and the Board of Directors, will review this Policy as required from time to time to ensure that it continues to be appropriate for Crown and its businesses.

**Crown Resorts Limited**  
February 2021

## Revision History

Issue Date	Version	Author Initials	Section Change	Change Details
17/12/2020	1.0			Group Policy internally approved.

*This Policy and any other material or information related to or connected with this Policy is the property of Crown Resorts and must be used for internal purposes only in the interest of and related to Crown Resorts.*

*You must not distribute or disclose this Policy or any other material or information related to or connected with this Policy unless authorised by Crown Resorts or required by law.*

*Any unauthorised use is unlawful and may result in disciplinary action and legal action being taken.*



**AGENDA ITEM 5:**  
Crown Melbourne Licence Review - Update





## Regulatory and Compliance

### Memorandum

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**To:** Responsible Gaming Committee

**From:** Michelle Fielding

**Date:** 3 February 2021

**Subject:** **Crown Melbourne – Sixth Review of Casino Licence under Section 25 of the *Casino Control Act 1991* (Vic) – Update Report**

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Dear Committee Members,

Further to previous reports to the Board, to date 18 of the 20 Recommendations have been responded to by Crown in full (noting that Recommendation 8 is in two parts, the first of which fell due and was responded to as required, the second part is due 1 July 2022). The remaining Recommendation 9 is deferred for 15 months in light of the impact of COVID-19.

The VCGLR has advised that the Recommendation 20 meeting will no longer be required.

**Attached** at is a table detailing the status of Crown's progress and commentary on the Recommendations.

Regards

A handwritten signature in blue ink, appearing to read "M Fielding", with a horizontal line underneath.

Michelle Fielding  
**Group Executive General Manager – Regulatory and Compliance**



**Crown Melbourne Limited Board  
Agenda Item 6: Section 25 Status Update  
January 2021**

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p><b><u>Recommendation 1</u></b></p> <p>The VCGLR recommends that, by 1 January 2019, Crown develop, and submit to the VCGLR for approval, a change program to fully engage its independent directors in proactive strategic oversight of the operations of the Melbourne Casino. Particular consideration should be given to -</p> <ul style="list-style-type: none"> <li>formulating a charter for the Crown Melbourne board</li> <li>fully documenting, for visibility to the VCGLR, the reporting and decision-making relationships between all of the boards, committees and executive meetings with responsibility for, or oversight of, Melbourne Casino functions, and</li> <li>elevation of governance to the group board and committees.</li> </ul> <p>The submission should identify any changes to regulatory frameworks and how these will be addressed.</p>	<p><b>Recommendation Accepted</b></p> <p>Crown will, in conjunction with its parent company, review its governance framework, taking into account the matters recommended by the Commission for consideration. A new framework for reporting has already been designed and is being worked through. Crown will continue to review its corporate structure moving forward with any proposed changes brought to the attention of the Commission.</p> <p>We also note that the current Crown Melbourne Framework has been considered by the Commission in times past, with some of the current structures in place as a result of regulatory obligations.</p>	<ul style="list-style-type: none"> <li>A submission addressing all points referenced in Recommendation 1 was submitted to the VCGLR on 24 December 2018. The submission included a Crown Melbourne Board Charter.</li> <li>Although not specifically related to Recommendation 1, Crown is drafting a new updated Company Constitution, which will require the approval of the Commission in due course.</li> </ul>	<p><b>1 January 2019</b></p>	<p><b>Yes</b></p>	<p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated March 2019.</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p><b>Recommendation 2</b></p> <p>The VCGLR recommends that, by 1 January 2019, Crown undertake a review of the required qualifications for committee chairs set out in the charters, and ensure that the appointees' actual qualifications match.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>Review undertaken and letter outlining actions taken by Crown submitted to the VCGLR on 24 December 2018.</li> </ul>	<p>1 January 2019</p>	<p>Yes</p>	<p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated March 2019. It was further requested that Crown should undertake the same review for Crown Resorts' Committees.</p> <p>Although not a requirement of the recommendation to carry out a review of the Crown Resorts Limited Committees, Crown responded by sending two letters outlining the review of the Crown Resorts Committees on 3 June 2019.</p> <p>The VCGLR noted Crown's response to the Recommendation by letter dated 6 August 2019.</p>
<p><b>Recommendation 3</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown assess the robustness and effectiveness of its risk framework and systems, including reporting lines in the chain of command, and upgrade them where required. This assessment should be assisted by external advice.</p>	<p><b>Recommendation Accepted</b></p> <p>It should be noted that the risk framework has already been reviewed and an enhanced framework is currently being implemented, which is supported by an IT based reporting, recording and management framework.</p> <p>Also, a Group General Manager – Risk and Audit was appointed in 2017 to oversee the group function of risk and audit. Additional resources have also been committed to support the enhanced framework.</p>	<ul style="list-style-type: none"> <li>The Group General Manager Risk &amp; Audit has reviewed Crown's risk framework and commenced enhancements to the framework and systems in early 2018. In this respect the enhanced risk framework has started to be rolled out across the business and is being embedded into work processes and systems.</li> <li>A new "Risk Appetite" was presented to, and ultimately approved, in December 2018 by the relevant Crown Boards and Committees.</li> <li>The supporting Risk Matrix was revised, approved by the business and embedded into the risk system to ensure the capture of Risk Profile data.</li> <li>Risk reporting has been restructured, and organised around seven risk categories, including the development of a key risk indicator (KRI) dashboard.</li> </ul>	<p>1 July 2019</p>	<p>Yes</p>	<p>By letter dated 3 September 2019, the VCGLR deferred its consideration of the Recommendation until the Deloitte Report was provided.</p> <p>Crown sent a copy of the Deloitte Report to the VCGLR by letter dated 13 September 2019.</p> <p>On 14 October 2019, the VCGLR wrote to Crown making further enquiries as to the status of each recommendation in the Deloitte Report.</p> <p>Crown responded to the VCGLR's further enquiries by letter dated 28 October 2019.</p> <p>By email on 15 November 2019, the VCGLR queried detail of Crown's letter of 28 October</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<ul style="list-style-type: none"> <li>An external firm was engaged to carry out a review of the risk framework elements. The relevant observations provided by the external firm have been included in the Risk Management Strategy document, which was presented to the relevant Crown Boards and approved.</li> <li>The risk system has been updated to reflect the updated framework elements, and implemented across Crown Melbourne.</li> <li>Letter outlining actions taken by Crown in accordance with the recommendation submitted to the VCGLR on 1 July 2019.</li> <li>A request was made by the VCGLR on 3 September 2019 for Crown to provide a copy of the Deloitte Report, which was provided on 13 September 2019.</li> <li>On 14 October 2014, the VCGLR emailed Crown requesting further detail on the status of each recommendation in the Deloitte Report which Crown responded to on 28 October 2019.</li> </ul>			<p>2019, which Crown responded to on 18 November 2019.</p> <p>By letter dated 9 January 2020, the VCGLR noted Crown's implementation of Recommendation 3, also indicating that the VCGLR will monitor Crown's implementation of the three outstanding Deloitte recommendations.</p>
<p><b>Recommendation 4</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown undertake a robust review of internal controls to ensure that Crown's regulatory and compliance department is aware of all projects and works in progress for which regulatory approvals might be relevant.</p>	<p><b>Recommendation Accepted</b></p> <p>In this respect, a new business-wide compliance framework has been designed and the roll out has commenced across the business. Further a new process has been implemented to address any proposed changes to the regulatory environment.</p>	<ul style="list-style-type: none"> <li>A Gaming Initiatives Form was developed and implemented into processes in the business and is the key action in satisfying this recommendation; along with the new Regulatory and Compliance Requirements Policy.</li> <li>A submission was made for an amendment to the EGM ICS to provide for the Gaming Initiative Form – VCGLR approval has been received.</li> <li>Review was undertaken to determine whether additional Internal Controls are required or existing controls require amendment.</li> <li>Although not specifically in response to this</li> </ul>	1 July 2019	Yes	The VCGLR noted Crown's undertaking of the Recommendation by letter dated 3 September 2019.

**Section 25 – Timeline – Implementation of Recommendations**

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>Recommendation, a new business wide compliance framework has been developed and rolled out to the business (95% of relevant departments are now integrated into the new framework). This included the commissioning of a reporting system (known as CURA) to support the new compliance framework.</p> <ul style="list-style-type: none"> <li>• A detailed submission on the Compliance Framework was sent to the Chairman of the Commission on 24 December 2018, related to the Blanking Buttons matter.</li> <li>• Review undertaken and letter outlining actions submitted to the VCGLR on 1 July 2019.</li> <li>• Following the review of internal controls, Crown will include a reference in relevant ICSs to Compliance being consulted prior to new initiatives being implemented (this will be done in conjunction with the changes required for Recommendation 17 once closed by the VCGLR).</li> </ul>			

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p><b>Recommendation 5</b></p> <p>The VCGLR recommends that Crown convene annual roundtable sessions briefing key internal staff on the VCGLR's risk-based approach to regulation, with a particular focus on how that approach relies on the integrity of Crown's internal processes.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>An annual briefing will be provided to Management at the Crown Melbourne Executive Risk and Compliance Committee (ERCC) meeting on the VCGLR's risk-based approach and its impact on Crown and its processes.</li> <li>On 21 May 2019 the Chairman presented to the ERCC the VCGLR's risk-based approach and how it relies on the integrity of Crown's internal processes. Each member of the Committee was also provided with a copy of the VCGLR's Regulatory Approach document as well as the summary version, for future reference. The minutes of the ERCC meeting reflect that the VCGLR's Risk Based Approach was presented at this meeting (and will be annually presented thereafter).</li> <li>A letter outlining the actions taken by Crown was submitted to the VCGLR on 28 June 2019.</li> </ul>	<p>Annual, ongoing</p>	<p>Yes</p>	<p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 29 October 2019.</p>
<p><b>Recommendation 6</b></p> <p>The VCGLR recommends that, by 1 January 2020, Crown Melbourne review its allocation of staffing resources to increase the number of work hours actually available to responsible gambling and intervention with patrons. This might be achieved by training more gaming staff to undertake assessments and then approach patrons identified as at risk, without the need to contact a RGLO. However, this will only be effective if those staff have sufficient time aside from their gaming duties.</p>	<p><b>Recommendation Accepted</b></p> <p>Crown has already commenced the process of employing an additional five Responsible Gaming staff members. Additionally, there will be a review of training for gaming and other related staff</p>	<ul style="list-style-type: none"> <li>Crown recruited five additional Responsible Gaming Liaison Officers (renamed Responsible Gaming Advisors (RGAs) and there are now 12 RGAs, which have assisted in having a greater presence on the gaming floor. The Gaming Machines and Table Games staff training framework has also been reviewed - Crown remains of the view that the referral to expert RG staff remains a corner stone of its RG model. However, revised training for Gaming Machines staff is being settled with the VCGLR and additional Senior Manager Training is being provided to all (330) Table Games Area Managers (over 12 months).</li> <li>A letter outlining the actions taken by Crown was submitted to the VCGLR on 23</li> </ul>	<p>1 January 2020</p>	<p>Yes</p>	<p>In response to Crown's submission of 23 December 2019, the VCGLR sent Crown some clarifying questions on 7 and 24 February 2020 (e.g. how many hours per week does an RGA work etc.), which Crown responded to on 20 and 26 February 2020.</p> <p>By letter dated 5 May 2020, the VCGLR noted that Crown had implemented Recommendation 6.</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		December 2019.			
<p><b>Recommendation 7</b></p> <p>The VCGLR further recommends that Crown Melbourne use observable signs in conjunction with other harm minimisation measures such as data analytics to identify patrons at risk of being harmed from gambling.</p>	<p><b>Recommendation Accepted</b></p> <p>A new data analytics trial has commenced in relation to carded players.</p>	<ul style="list-style-type: none"> <li>Crown has continued to use observable signs as a key element to its responsible gaming framework, together with the enhancement of its Play Period monitoring tool and the Crown Model.</li> <li>Crown has developed a data analytics program called the "Crown Model", which has been developed from data and behaviours of former patrons who have self-excluded from Crown Melbourne. The Crown Model is designed as a predictive tool to assist in proactively identifying patrons who may be gambling in a manner which could be an indicator of potential harm.</li> <li>The trial of the Crown Model commenced on 25 June 2018 with operational procedures developed to respond to players of interest that are identified.</li> <li>The Crown Model is in its early stages with processes being adjusted as we learn from outputs.</li> <li>The first six month review is complete and the team is meeting regularly to discuss refinements.</li> <li>The 12 month trial has finished with the results being considered by the Responsible Gaming and Data Analytics team.</li> <li>Crown is also in the process of obtaining a separate external review of the methodology.</li> <li>A letter (in combination with the response to Recommendation 8) outlining the actions taken by Crown was submitted to the VCGLR</li> </ul>	Ongoing	Yes	<p>In response to Crown's submission of 30 December 2019, the VCGLR sent Crown some clarifying questions on 18 and 19 February 2020 (e.g. how many staff are in the Customer Analytics Team etc.), which Crown responded to on 24 and 26 February 2020.</p> <p>A further question was received from the VCGLR on Friday, 27 March 2020, which Crown responded to on 31 March 2020.</p> <p>The VCGLR has sent clarifying questions, the most recent on 24 June 2020. Crown has responded to all questions, which address:</p> <ul style="list-style-type: none"> <li>➤ The mechanics of the Crown Model</li> <li>➤ Departments/resources involved in the Crown Model trial and interactions</li> <li>➤ How observable signs are used in conjunction with data analytics</li> </ul> <p>By letter dated 19 August 2020, the VCGLR noted Crown's undertaking of the Recommendation.</p>





**Section 25 – Timeline – Implementation of Recommendations**

Recommendation	Crown’s Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>been identified.</p>			<p>confidentiality should therefore be protected.</p> <p>The VCGLR has sent clarifying questions in response to Crown’s December 2019 submission, the most recent of which was received on 24 June 2020. Crown has responded to all questions, which were largely focused on the use of the Splunk dashboard for play period reporting (e.g. timeliness of reporting).</p> <p>By letter dated 19 August 2020, the VCGLR noted Crown’s undertaking of Recommendation 8a), however, suggested some matters may need to be addressed through Recommendation 9. The VCGLR further requested that Crown provide to it within 14 days, the report it relied upon for Recommendation 8, by Alex Blaszczyński.</p> <p>On 2 September 2020, Crown provided the VCGLR a copy of Professor Blaszczyński’s Report – (redacted to remove the matters outside the scope of the Crown Model, which were commissioned under Legal Professional Privilege).</p> <p>On 15 October 2020 the VCGLR again wrote to Crown regarding the Blaszczyński Report, querying Crown’s redactions. On 29 October 2020, in an effort to be more transparent, Crown provided the VCGLR with an un-redacted version of the Report.</p>

**Section 25 – Timeline – Implementation of Recommendations**

Recommendation	Crown’s Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p><b><u>Recommendation 9</u></b></p> <p>The VCGLR recommends that Crown Melbourne arrange, at its expense, for an independent assessment of the real-time player data analytics tool for carded play (see Recommendation 8(a)), to be completed 12 months after implementation of the tool. The independent assessment is to be undertaken by a person approved by the VCGLR, after consultation with Crown.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>Crown has approached two individuals recommended by the Chair of the Crown Resorts Responsible Gaming Advisory Panel, Professor Alex Blaszczyński, to conduct the independent assessment, and both have expressed interest. The candidates are currently under consideration.</li> </ul>	<p><b>1 December 2020</b></p>	<p><b>No</b></p>	<p>By letter dated 19 August 2020, the VCGLR noted that Crown and the VCGLR should review the matters required by Recommendation 9.</p> <p>A meeting was held on Tuesday 1 September 2020 between Crown and the VCGLR. It was agreed that the VCGLR would propose to the Commission that the 2.5 months of data that was collated prior to closure of the Casino for COVID-19, would be insufficient for the purposes of assessing effectiveness. Crown will likely be asked to make a submission seeking a new date range for the data, once notified by the VCGLR that their internal meeting has occurred.</p> <p>On 8 October 2020, Crown wrote to the VCGLR requesting an extension for Recommendation 9, proposing that the new starting point for data collection is a minimum of three months post the opening of Crown’s Main Gaming Floor, to allow for gaming activity to return to a somewhat normalised level, to capture data that is not overly skewed by the impact of re-opening. The VCGLR responded on 4 November 2020, providing an extension until 15 months after gaming recommencement at Crown.</p> <p>On 14 January 2021, the VCGLR wrote to Crown setting out the scope of its expectations for the</p>

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## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
					Recommendation 9 independent assessment.
<p><b>Recommendation 10</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne undertake a comprehensive review of its policy for the making and revocation of voluntary exclusion orders under section 72(2A) of the <i>Casino Control Act</i>. The comprehensive review should be undertaken in conjunction with the VCGLR, VRGF and other relevant external stakeholders. The review should be undertaken with a view to implementing policies that facilitate:</p> <ul style="list-style-type: none"> <li>• Crown Melbourne issuing short term exclusion orders for 3, 6, 12 or 24 months under section 72 of the <i>Casino Control Act</i>, considering the specific circumstances of the person and their preferred time period for exclusion, and conditional on the person undertaking to comply with the order and with other matters (such as obtaining treatment), and</li> <li>• Crown Melbourne reviewing voluntary exclusion orders which are more than 10 years old to consider whether the continued operation of these orders serves a useful purpose, with a view to retaining only those orders that are beneficial to the persons who are subject to them, and can be adequately enforced. The VCGLR further recommends that the</li> </ul>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>• Literature review completed.</li> <li>• The VCGLR, VRGF and Crown had their first meeting on 29 November 2018 to commence discussions on this recommendation.</li> <li>• The VCGLR, VRGF and Crown held six tripartite meetings to discuss Recommendation 10.</li> <li>• Crown has obtained external opinion on its proposals for recommendation 10.</li> <li>• Crown considered voluntary exclusion orders, which are more than 10 years old and determined not to revoke them.</li> <li>• Crown has amended its Self-Exclusion Program to allow patrons to determine the number of years they will be Self-Excluded for (minimum of 12 months) and has amended its Time-Out Program to include a 3 and 6 month Agreement.</li> <li>• A letter outlining the actions taken by Crown was submitted to the VCGLR on 28 June 2019.</li> <li>• Further inquiries were made by the VCGLR on 16 September 2019 in relation to the benefits of the Time Out program and its comparison to the Exclusion Program, which were answered by Crown on 26 September 2019.</li> </ul>	<p><b>1 July 2019</b></p>	<p><b>Yes</b></p>	<p>On 16 September 2019, the VCGLR wrote to Crown in response to its submission, asking for further clarifying information.</p> <p>Crown responded to the VCGLR's requests on 26 September 2019.</p> <p>By letter dated 13 November 2019, the VCGLR noted Crown's undertaking of the Recommendation. The letter further requested data from Crown's 12 month trial of the Time Out Program.</p> <p>On 15 January 2020, the VCGLR wrote to Crown setting out its requirements for the provision of data, which Crown provided as required on 24 February 2020. The second and final tranche of data was provided to the VCGLR on 31 August 2020.</p> <p>On 25 September the VCGLR requested further time out data, from earlier trials, which was provided as requested, on 19 October 2020.</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
review of such orders occurs in an orderly manner between 1 July 2019 and 30 June 2020.					
<p><b>Recommendation 11</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne develop and implement a policy and procedure to facilitate Crown Melbourne issuing involuntary exclusion orders under section 72(1) of the <i>Casino Control Act</i> at the request of family members and friends in appropriate cases. The policy and procedure should be developed in conjunction with the VCGLR, VRGF and other external stakeholders. Crown Melbourne should include information about this option in all its responsible gambling publications, website and regularly provide information to relevant stakeholders, such as Gambler's Help and other similar organisations, about this option.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>The Crown Perth Third Party Exclusion (TPE) Policy and Procedure was reviewed and adjusted, in draft, to suit Crown Melbourne.</li> <li>The VCGLR, VRGF and Crown at their tripartite meetings (refer Recommendation 10) considered the draft TPE Policy and Procedure.</li> <li>At the second tripartite meeting on 18 December 2018 the VCGLR requested further material for the literature review and that Crown Melbourne provide Third Party Exclusion statistics from Crown Perth.</li> <li>The VCGLR also indicated that it proposed to meet with the South Australian Regulator to discuss its processes.</li> <li>Various versions of the TPE Program were reviewed, amended and settled by the Tripartite group.</li> <li>A letter outlining the actions taken by Crown was submitted to the VCGLR on 28 June 2019.</li> <li>Further inquiries were made by the VCGLR on 16 September 2019 in relation to the methods of contact with Crown regarding Third Party Exclusions, which were answered by Crown on 26 September 2019.</li> </ul>	1 July 2019	Yes	<p>On 16 September 2019, the VCGLR wrote to Crown in response to its submission, asking for further clarifying information.</p> <p>Crown responded to the VCGLR's requests on 26 September 2019.</p> <p>By letter dated 13 November 2019, the VCGLR noted Crown's undertaking of the Recommendation.</p>
<p><b>Recommendation 12</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne expand facial recognition technology to cameras on all entrances to the casino and that Crown Melbourne provide written</p>	<p><b>Recommendation Accepted</b></p> <p>Crown notes that it has already expanded its facial recognition capabilities and proposes to continue</p>	<ul style="list-style-type: none"> <li>Facial recognition cameras are now operating on all entrances to the casino.</li> <li>A letter to the VCGLR confirming that all entrances to the Casino (including salons) are covered by facial recognition cameras was sent to the VCGLR on 28 May 2019 to</li> </ul>	1 July 2019 (and ongoing quarterly reports)	Yes	<p>On 24 June 2019 the VCGLR emailed Crown to arrange an inspection of the cameras at each entrance to ensure compliance. The audit was arranged for Wednesday 3 July 2019 and</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
updates on a quarterly basis on its effectiveness to the VCGLR.	to do so in FY20.	<p>close out the Recommendation.</p> <ul style="list-style-type: none"> <li>Crown commenced providing quarterly updates from October 2019 (which covered the period 1 July 2019 to 30 September 2019) on the effectiveness of its Facial Recognition Technology.</li> </ul>			<p>proceeded as scheduled.</p> <p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 6 August 2019.</p> <p>By email dated 22 November 2019, the VCGLR sought clarifying information regarding Crown's first provision of the Quarterly Update. The queries largely concerned whether an over-reliance on Neoface could reduce Crown's regular efforts at detecting breaches or attempted breaches. Crown responded no, as no existing processes were altered as a result of the implementation of Neoface.</p> <p>By letter dated 9 January 2020, the VCGLR noted Crown's provision of the first quarterly update, in line with Recommendation 12. Crown has since submitted a further two quarterly updates.</p>
<p><b>Recommendation 13</b></p> <p>The VCGLR recommends that, as part of developing a new responsible gambling strategy, by 1 July 2019, Crown Melbourne rebrand or refresh its responsible gambling messaging and publish new responsible gambling messages throughout the casino, in all Crown Melbourne publications, including online and social media platforms.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>To be progressed upon finalisation of the RG Strategy (see recommendation 14).</li> <li>Initial drafts of new logo being developed.</li> <li>Marketing has been briefed regarding a refresh and a new logo has been developed – ready for internal review/approval. Strategy will be set by 1 July 2019 and roll-out will commence at that time.</li> <li>Crown finalised the new marketing design and refresh (including logo). Nomenclature changed from Responsible Gambling Support Centre to Responsible Gaming Centre and</li> </ul>	<p><b>1 July 2019</b></p>	<p><b>Yes</b></p>	<p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 3 September 2019.</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>Responsible Gambling Liaison Officer to Responsible Gaming Advisors. Brochures and on-line material have been refreshed.</p> <ul style="list-style-type: none"> <li>A letter outlining the actions taken by Crown was submitted to the VCGLR on 29 June 2019.</li> </ul>			
<p><b>Recommendation 14</b> 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:</p> <p>(a) early proactive intervention initiatives</p> <p>(b) player data analytics</p> <p>(c) proactive engagement with pre-commitment</p> <p>(d) intervening with local players with continuous play based on shorter timeframes which are more reflective of responsible gambling</p> <p>(e) the role of all staff in minimising harm</p> <p>(f) the effective use and monitoring of exclusion orders</p> <p>(g) internal reporting arrangements</p> <p>(h) integrating responsible gambling into proposals for trialing or introduction of new products and equipment</p> <p>(i) performance measures to assess the performance of the RGLOs, RGSC and casino staff in relation to harm minimisation</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>A draft strategy was prepared and ratified by the Crown Resorts Limited Responsible Gaming Committee and is being implemented.</li> <li>A letter outlining the actions taken by Crown was submitted to the VCGLR on 29 June 2019.</li> </ul>	<p><b>July 2019</b></p>	<p><b>Yes</b></p>	<p>On 20 August 2019, the VCGLR wrote to Crown in response to its submission, asking for further clarifying information.</p> <p>Crown responded to the VCGLR's request on 26 August 2019.</p> <p>By letter dated 13 November 2019, the VCGLR noted Crown's undertaking of the Recommendation.</p>

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown’s Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p>(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</p> <p>(k) the objectives of the RGSC in relation to minimising harm to patrons, and</p> <p>(l) the responsible service of gambling as a fundamental core business consideration when making strategic decisions regarding casino operations.</p>					
<p><b>Recommendation 15</b></p> <p>The VCGLR recommends that, within three months of implementing the new responsible gambling strategy (Recommendation 14), there is regular reporting to the Crown Resorts Responsible Gambling Committee for it to maintain oversight of Crown Melbourne’s harm minimisation strategy for responsible gambling. Regular reports every two months should include numbers and types of interventions and other harm minimisation activities of RGSC and other staff, details of the number and nature of referrals to external service providers, exclusion orders, breaches, revocation and appeals, as well as results from player data analytics and other initiatives to minimise gambling related harm. These reports should also be made available to the VCGLR for monitoring purposes. (The VCGLR intends to share this information, as appropriate, with the VRGF).</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>Revised reporting developed.</li> <li>A letter was sent to the VCGLR to close the Recommendation on 1 October 2019, notifying that reporting would commence at the next meeting of the Crown Resorts Responsible Gaming Committee, dated 9 October 2019.</li> <li>New reporting on statistics provided to CRL Responsible Gaming Committee.</li> </ul>	<p>1 October 2019</p>	<p>Yes</p>	<p>By email on 12 November 2019, the VCGLR requested a copy of the RG Report that was provided to the Crown Resorts Limited RG Committee on 9 October 2019.</p> <p>Crown provided the Report with a covering letter concerning its confidentiality, on 26 November 2019.</p> <p>By letter dated 9 January 2020, the VCGLR noted Crown’s undertaking of the Recommendation, additionally requiring that each report to the CRRGC be provided to the VCGLR after each meeting and that each report include ‘results from player analytics’ post completion of Recommendation 8.</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p><b>Recommendation 16</b></p> <p>The VCGLR recommends that within three months of implementing the strategy, a charter is developed for the Crown Melbourne Responsible Gambling Management Committee (staff committee) which includes reference to the role and responsibility of driving a harm minimisation culture.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>Management is currently reviewing all Australian Resorts RG Committees to align processes where appropriate.</li> <li>A Charter has been developed.</li> <li>A letter was sent to the VCGLR attaching the Charter to close the Recommendation off on 1 October 2019.</li> </ul>	<p>1 October 2019</p>	<p>Yes</p>	<p>By letter dated 20 December 2019, the VCGLR noted Crown's undertaking of the Recommendation.</p>
<p><b>Recommendation 17</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown undertake a robust review (with external assistance) of relevant internal control statements, including input from AUSTRAC, to ensure that anti-money laundering risks are appropriately addressed.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>Crown met with AUSTRAC to discuss this recommendation. A new joint AML Program across Crown's Australian Resorts is being developed and will be reviewed by an external party. AUSTRAC is being kept informed of progress.</li> <li>Internal Controls have been reviewed, preliminary discussions with AUSTRAC have taken place and draft changes have been made for management review.</li> <li>In addition to a review of the ICSSs, Crown also reviewed the primary tool to manage the risks associated with anti-money laundering, being the AML/CTF Program;</li> <li>Crown has performed an extensive review of its corporate risk management framework, ensuring its relevance and effectiveness to Crown. An extensive alignment effort was also undertaken, to ensure consistency across all key areas of the business, including the AML program.</li> <li>In March – May 2019, Crown conducted its annual ML/TF Risk Assessment of the designated services it provides, its delivery methods, the technology used and its customers. The ML/TF Risk Assessment includes a consideration of Junket Operators and Junket Players, and potential ML/TF risks</li> </ul>	<p>1 July 2019</p>	<p>Yes</p>	<p>On 21 August 2019, the VCGLR wrote to Crown noting its intention to conduct its own independent review of the ICSSs for risk mitigation opportunities with regard to AML (was not part of the Recommendation).</p> <p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 29 October 2019. The letter further noted again, the VCGLR's intention to conduct its own independent review of the ICSSs, with external assistance.</p> <p>On 10 August 2020, the VCGLR wrote to Crown noting that it has completed its independent review of the ICSSs and asked for Crown to nominate a contact it could liaise with to settle proposed changes.</p> <p>Crown replied to the VCGLR's letter on 18 August 2020, nominating Michelle Fielding as their key contact. On 11 September 2020, the VCGLR forwarded a proposed schedule to review 10 Internal Control</p>



**Section 25 – Timeline – Implementation of Recommendations**

Recommendation	Crown’s Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>arising in respect thereof.</p> <ul style="list-style-type: none"> <li>• Crown examined all relevant Internal Control Statements and Standard Operating Procedures, in light of the ML/TF Risk Assessment above, to ensure that we reflect in the relevant ICSs, the seriousness with which Crown focuses upon, and addresses, potential ML/TF risks that might be presented by its business.</li> <li>• We have also had regard to the language adopted for the Internal Control Manuals in NSW, which were accepted and approved by Liquor &amp; Gaming NSW.</li> <li>• We further examined ancillary documentation (policies, procedures, training) to ensure that AML risks are appropriately addressed by Crown.</li> <li>• Since the last update, Crown has had further conversations with AUSTRAC regarding Recommendation 17.</li> <li>• Crown has packaged the extensive work it has undertaken over the past 6 months and sent it to AUSTRAC during the week commencing 27 May 2019, seeking its input.</li> <li>• Crown also sent the packaged to an external AML expert during the week commencing 27 May 2019, seeking its input.</li> <li>• Crown received input/responses from both AUSTRAC and the independent expert, which it incorporated into proposed ICS changes, which will be submitted to the VCGLR for approval once their letter closing the Recommendation is received.</li> <li>• A letter outlining the actions taken by Crown was submitted to the VCGLR on 1 July 2019.</li> <li>• On 21 August 2019 the VCGLR wrote to</li> </ul>			<p>Statements, commencing mid-October.</p> <p>In December 2020, submissions were made to the VCGLR to update the Junket and Introductory Chapter ICSs in line with agreed criteria – we are currently engaged in discussions concerning timing of go-live dates.</p>

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		Crown requesting a copy of the expert report from Initialism Pty Ltd. Additionally, the letter noted that the VCGLR would conduct its own review of the relevant ICSs. Crown provided the Initialism Report on 28 August 2019.			
<p><b>Recommendation 18</b></p> <p>The VCGLR recommends, in all future submissions by Crown Melbourne to the VCGLR for approvals under the <i>Casino Control Act</i> or <i>Gambling Regulation Act</i>, that Crown document:</p> <ul style="list-style-type: none"> <li>the purpose</li> <li>obligations under relevant provisions of legislation, the Transaction Documents, and existing approvals</li> <li>what changes the grant of the approval would make to products, rules and procedures, etc</li> <li>risks associated with the approval and how they will be treated</li> <li>how responsible gambling considerations have been taken into account in the process and the measures Crown will implement to mitigate the risk of gambling related harm, and</li> </ul> <p>which areas of Crown will be responsible for managing implementation.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>A new template for submissions to the VCGLR for seeking approvals was drafted and has been in use since July 2018.</li> <li>A letter was sent to the VCGLR to close the Recommendation off on 11 October 2019.</li> </ul>	Immediate effect	Yes	By letter dated 20 December 2019, the VCGLR noted Crown's undertaking of the Recommendation.
<p><b>Recommendation 19</b></p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne implement a policy to make an exclusion order under section 72 of the <i>Casino Control Act</i> in appropriate cases where a</p>	<p><b>Recommendation Accepted</b></p> <p>Crown notes that it has had a policy in place to issue Exclusion Orders for unacceptable behaviour for</p>	<ul style="list-style-type: none"> <li>The existing 'Unacceptable Behaviour' policy statement has been reviewed and amended to strengthen the use of exclusion orders either instead of or as well as withdrawal of licences (in appropriate cases). Policy is currently</li> </ul>	1 July 2019	Yes	On 11 June 2019 the VCGLR wrote to Crown asking for further amendments, including explaining to staff when to issue each type of ban order (not a requirement of the Recommendation).

## Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p>person has engaged in significant unacceptable conduct in the casino or is the subject of serious criminal charges.</p>	<p>over ten years and does issue Exclusion Orders for this purpose in appropriate circumstances. Crown also notes that it issues withdrawal of licence notices to persons in appropriate circumstances, as it is entitled to do as a common law right, as those notices cover broader areas of the Crown property than the more limited area covered by Exclusion Orders.</p>	<p>under review by management.</p> <ul style="list-style-type: none"> <li>Management feedback has been received and the policy has been updated. A letter to the VCGLR to close out the Recommendation was sent on 27 May 2019.</li> <li>On 11 June 2019 the VCGLR wrote to Crown asking for further amendments, including explaining to staff when to issue each type of ban order (was not a requirement of the Recommendation).</li> <li>Various discussions and meetings were held between Crown and the VCGLR, including on the difficulty of amending a non-Regulated document, which operates effectively and will be amended annually.</li> <li>A further letter outlining Crown's policies was submitted to the VCGLR on 3 December 2019. The VCGLR made further queries of Crown and it provided amended versions of the Policies on 9 January 2020.</li> </ul>			<p>A number of meetings and correspondence on the matter have since transpired. Crown last met with the VCGLR to discuss this matter on 24 October 2019.</p> <p>The VCGLR made further queries of Crown and Crown provided amended versions of the Policies on 9 January 2020.</p> <p>By letter dated 20 February 2020, the VCGLR noted Crown's undertaking of the Recommendation.</p> <p>Crown published the amended Policies on its intranet on 20 February 2020.</p>
<p><b>Recommendation 20</b></p> <p>The VCGLR recommends that, between November 2019 and March 2020, VCGLR Commissioners and directors of the Crown Resorts Board meet to review the implementation of the recommendations set out in this report.</p>	<p><b>Recommendation Accepted</b></p>	<ul style="list-style-type: none"> <li>On 21 October 2019, MF called Alex Fitzpatrick (Director) requesting guidance on suitable Crown Resorts Directors to attend the meeting. Ms Fitzpatrick will consider and revert.</li> <li>Meeting dates and attendees have been proposed by Crown and are being reviewed by the Commission.</li> <li>The meeting has been postponed until a date to be set at the completion of the ILGA Inquiry.</li> </ul>	<p><b>Between November 2019 and March 2020</b></p>	<p><b>In progress</b></p>	<p>On 28 October 2019 the VCGLR wrote to Crown asking for further clarifying information as to date and attendee proposals.</p> <p>Crown responded to the VCGLR on 30 October 2019 advising that it is open to any dates whereby the Commissioners and Crown Directors are available (the VCGLR proposed three dates in March) and possible Directors, which was put to the Commission, however the dates were unavailable. Further dates were proposed and</p>

**Section 25 – Timeline – Implementation of Recommendations**

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
					<p>agreed, however, Crown had late unavailability.</p> <p>The VCGLR wrote to Crown by email on 22 January 2020 expressing that the meeting now won't occur within the timeframe required by the recommendation, because of the unavailability of Crown Directors and proposing two new dates for the meeting, noting that the Commission will not consider an extension beyond the proposed dates. Crown confirmed 22 April 2020, which was one of the two proposed dates.</p> <p>The 22 April 2020 meeting was postponed as a consequence of the COVID-19 pandemic and is now scheduled for 1 September 2020.</p> <p>The 1 September 2020 meeting has been postponed as a consequence of the ILGA Inquiry, to a date yet to be set.</p>

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**AGENDA ITEM 6:**  
Betfair Responsible Gaming Report



## SUBMISSION TO THE CROWN RESORTS RESPONSIBLE GAMBLING COMMITTEE

### OVERVIEW

The following has occurred since the last Committee meeting on 2 December 2020:

- on 4 December 2020, Betfair received a Show Cause Notice from Liquor & Gaming NSW. This matter has been reported to the Board of Crown Resorts and is discussed below. A further update will be provided at the Committee meeting on 9 February 2021;
- in December 2020, Betfair's Marketing Team ran a new campaign, promoting the Time Out functionality that Betfair offers to customers. The campaign has led to increased use of this particular tool. Time Out statistics are set out below; and
- in January 2021, Betfair commenced a review of its 'Policy on the identification of Red Flag Behaviours'. This review is discussed below.

It is also noted that:

- in relation to Betfair's Responsible Gambling Webpage, the number of page views for January 2020 was 1,130, while the number of page views for January 2021 was 1,146;
- a total of 50,057 Australian/NZ Betfair customers are utilising deposit limits as of 2 February 2021, compared to 38,718 which used the tool during the 2019-20 financial year; and
- Betfair's Marketing Team will run a new campaign in late February 2021, promoting the deposit and loss limit functionality that Betfair offers.

### SHOW CAUSE NOTICE PROVIDED BY LIQUOR & GAMING NSW (L&GNSW)

On 4 December 2020, Betfair received a Show Cause Notice (**Notice**) from L&GNSW. In the Notice, L&GNSW:

- referred to advertisements that Betfair had published in late October 2020 (**Relevant Advertisements**). In the Relevant Advertisements, Betfair mentioned that:
  - Sportsbet was running a promotion where ten randomly selected Sportsbet customers would receive a \$10,000 bonus bet; and
  - the ten customers could 'promo arb' the bonus bets (i.e. place a back bet on a runner with Sportsbet, and a lay bet on the same runner with Betfair);
- stated it was of the view that the Relevant Advertisements breached the *Betting and Racing Act 1998* (NSW). Specifically, L&GNSW asserted that Betfair had published an advertisement which contained '*an inducement to participate, or to participate frequently, in any gambling activity*';



- stated that the Relevant Advertisements constitute a prohibited inducement as they contain ‘*an inducement to open a betting account or participate in gambling activities by offering bonuses and special odds for a limited period, specific race or match*’. In this regard, we note that Betfair has not offered any bonuses or special odds. Betfair has referred to bonuses being offered by Sportsbet and noted that the 10 customers in question could place lay bets on Betfair.

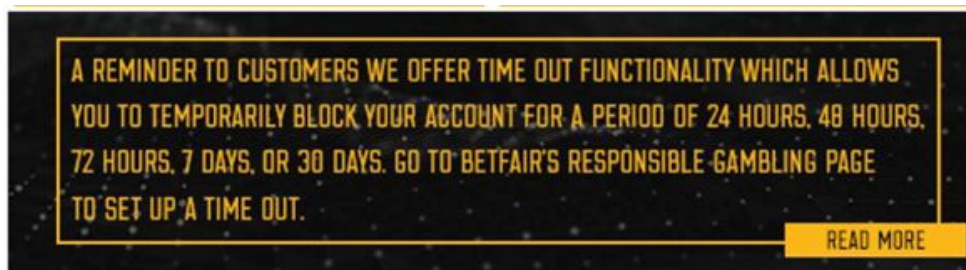
Betfair engaged Allens to provide advice, and subsequently responded to the Notice on 18 December 2020.

As at 2 February, we have not received any further correspondence from L&GNSW. We will provide an update on this matter at the Committee meeting.

#### PROMOTION OF TIME OUT FUNCTIONALITY

One of the responsible gambling tools available to Betfair’s customers is the Time Out functionality. Betfair customers can put a Time Out in place for a period of their choosing.

In December 2020, Betfair’s Marketing Team ran a new campaign, promoting the Time Out functionality. The following content was included in email communications to customers.



Pleasingly, the campaign has led to increased use of the tool. Time Out statistics are set out below (and are tracking well).

Betfair’s Marketing Team will run a new campaign in late February, promoting the deposit and loss limit functionality that Betfair offers.

#### REVIEW OF RED FLAG BEHAVIOURS POLICY

Betfair is licensed in the Northern Territory and must comply with the *NT Code of Practice for Responsible Service of Online Gambling 2019 (NT RG Code)*. It is stated in the NT RG Code that:

*Where appropriate, a customer who displays some, or a number, or a repetition of red flag behaviours should be monitored by an online gambling provider and appropriate customer interaction should take place to assist or protect that customer which reasonably corresponds to the circumstances. Online gambling providers should ensure responsible gambling policies and procedures are in place to allow staff to detect and assist customers who may be experiencing problems with gambling.*



In 2019, in compliance with the NT RG Code, Betfair put in place a 'Policy on the identification of Red Flag Behaviours' (**RF Behaviours Policy**).

In mid-November 2020, Nick Sheedy (former employee of BetEasy) commenced with Betfair in the role of 'Responsible Gambling and Compliance Analyst' (a newly created position). In January, Mr Sheedy commenced a review of the RF Behaviours Policy (**the Review**). In particular, Mr Sheedy is reviewing the transactional reporting which is currently in place (implemented by Betfair's Analytics and Insights Team). The purpose of this reporting is to identify transactional red flag behaviours (e.g. escalating sums of money deposited).

We will keep Sonja Bauer (Group General Manager, Responsible Gaming) and the Committee updated on progress, findings and any amendments to the RF Behaviours Policy. Representatives from Betfair (including Mr Sheedy) will meet with Sonja on 4 February to discuss the Review.

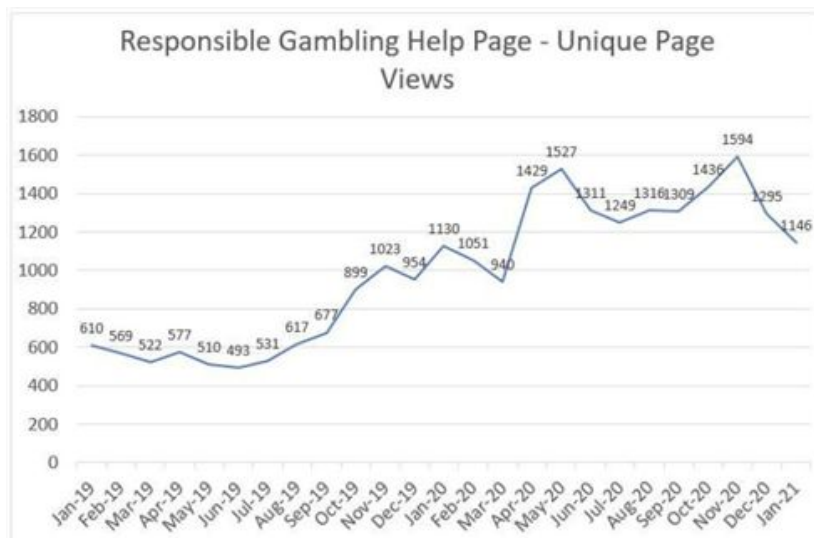
#### SENDING MARKETING MATERIAL TO PEOPLE WHO HAVE SELF-EXCLUDED FROM CROWN MELBOURNE/CROWN PERTH

Since mid-January 2019, on a weekly basis, Crown has been sending to Betfair's Marketing Team a list of people who have self-excluded from the Crown properties (**Self-Exclusion List**). Each time the Self-Exclusion List is sent to Betfair's Marketing Team, we 'wash' the Self-Exclusion List against our customer database and identify any matches (i.e. we check to see if a person on the Self-Exclusion List has an account with Betfair). If we identify that a particular self-excluder from Crown has an account with Betfair, we cease sending any marketing/promotional material to the customer.

As at 2 February 2021, we have identified 96 matches (in total), and have ceased sending marketing/promotional material to those particular customers.

#### TRAFFIC VISITING BETFAIR'S RESPONSIBLE GAMBLING WEBPAGE

The below graph shows how many people have been visiting Betfair's Responsible Gambling Webpage between 1 January 2019 and 31 January 2021.







We note the number of page views for January 2020 was 1,130, while the number of page views for January 2021 was 1,146. Betfair is continuing to promote its Responsible Gambling Webpage on its social media channels and in email communications to customers.

## 2020-21 Statistics

### Deposit Limits

A total of 50,057 Australian/NZ Betfair customers are utilising deposit limits as of 2 February 2021, compared to 38,718 which used the tool during the 2019-20 financial year. This represents an **increase** of 29%. Please see the table below for further information.

#### *Deposit Limit Breakdown by Amount*

Deposit Limit	Daily	Weekly	Monthly	Yearly	Total 2020/21	Total 2019/20
Less than \$101	6,545	9,062	4,910	0	20,517	16,859
\$101 - \$500	4,920	5,870	2,638	1	13,429	10,224
\$501 - \$1000	2,551	2,531	1,337	0	6,419	4,573
Over \$1000	3,340	4,422	1,929	1	9,692	7,062



## Loss Limits

A total of 10,310 Australian/NZ Betfair customers are utilising loss limits as of 2 February 2021, compared to 9,730 from 1 July 2020. Please see the table below for further information.

### Loss Limit Breakdown by Amount

Loss Limit	Daily	Weekly	Monthly	Yearly	Total 2020/21	Total 2019/20
Less than \$101	181	1,891	956	394	3,422	3,373
\$101 - \$500	216	1,951	814	143	3,124	3,072
\$501 - \$1000	206	843	332	97	1,478	1,444
Over \$1000	652	805	704	125	2,286	1,841

A total of 51,901 Australian/NZ accounts are utilising either a deposit or loss limit as of 2 February 2021 (some accounts use both limit types and are represented in both tables above). This represents a total of approximately 22.3% of all of Betfair's Australian/New Zealand customers.

These tools are successfully promoting responsible gambling amongst Betfair's customers and Betfair believes these limits play a key role in mitigating any social negative consequences associated with wagering.

## Self-Exclusion

A total of 1,475 Australian/NZ Betfair customers have made use of the self-exclusion functionality between 1 July 2020 and 2 February 2021.

### Self-Exclusion Breakdown by State

Self-Exclusion By State	2020/21*	Total 2019/20
Victoria	572	762
New South Wales	358	746
Tasmania	26	87
ACT	25	50
South Australia	93	167
Queensland	233	468
Western Australia	123	233
Northern Territory	11	33
New Zealand	34	51

\*As of 2 February 2021



## Time Out

A total of 936 Australian/NZ customers have made use of the timeout functionality between 1 July 2020 and 2 February 2021.

### *Time Out Breakdown by State*

Time Out By State	2020/21*	Total 2019/20
Victoria	331	411
New South Wales	250	341
Tasmania	18	27
ACT	16	18
South Australia	65	72
Queensland	143	210
Western Australia	83	106
Northern Territory	12	13
New Zealand	18	36

\*As of 2 February 2021



**AGENDA ITEM 7:**  
Gaming Environment Scan



## Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2020 and January 2021

### SECTION 1: Key Information

#### 1. Australia

##### December 2020

A report showing a significant increase in problem gambling in the Northern Territory has been made public after the NT Government backtracked on its previous refusals to release it. The final report — which analysed the responses of 5,000 adults to more than 100 questions — found the proportion of Territory adults with a gambling problem doubled from 0.7 per cent in 2015 to 1.4 per cent three years later. The NT Government is yet to outline its response to the report's findings.

<https://www.abc.net.au/news/2020-12-18/nt-problem-gambling-rates-double-in-government-report/12990138>

RSL Clubs' poker machine venues attracted further media attention with the sale of the Templestowe RSL club to Manningham Council, which intends to lease it only on the condition of no poker machines. Additionally, licence fees for poker machines were causing fiscal concerns.

<https://www.theage.com.au/national/victoria/rsl-clubs-left-in-limbo-about-pokies-exit-20201219-p56owd.html>

##### January 2021

Several articles commented on the proposal in South Australia that note acceptors would be introduced at gaming venues following the implementation of Facial Recognition Technology, which would identify those that are 'confirmed' problem gamblers (i.e. those that have self excluded).

<https://www.adelaidenow.com.au/news/south-australia/warnings-facial-recognition-tech-not-enough-to-offset-damage-if-pokies-accept-bank-notes/news-story/91a386f47b58b3ec5c99f3c591d32715>

The NSW Office of Responsible Gambling released the *NSW Youth Gambling Study 2020*, which has attracted media attention via a number of channels. The Australasian Gaming Council is preparing a Research Update on the topic, in the meantime, the key findings included that many young people are engaging in gambling and games with gambling components. In the last year, more young people had played games with gambling components than had participated in actual gambling. However, almost one quarter told us they had participated in some form of illegal underage gambling. A small group of young people were found to be problem



## Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2020 and January 2021

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gamblers (1.5%) or at-risk gamblers (2.2%). This problem gambling rate is similar to those found in the most representative youth studies.

<https://www.gamblingnews.com/news/gambling-study-on-young-people-revealed-gambling-begins-at-11/>

### 2. United Kingdom

#### December 2020

The Department for Digital, Culture, Media and Sport (DCMS) has launched the Gambling Act Review with the publication of a Call for Evidence into the Gambling Act 2005. The Call for Evidence, which will run until 31 March 2021, will look at online restrictions, marketing and the powers of the Gambling Commission as part of a major and wide-ranging review of gambling laws. This announcement attracted wide spread UK coverage.

<https://www.gamblingcommission.gov.uk/news-action-and-statistics/news/2020/Gambling-Commission-welcomes-publication-of-Gambling-Act-Review-Call-for-Evidence.aspx>

#### January 2021

The UK Gambling Commission is seeking feedback and guidance on changing the 'research methodology' used to collect data on gambling participation and problem gambling prevalence statistics. The Commission has launched a consultation for feedback on its new approach, which aims to establish a new 'standard on research into gambling behaviours'.

<https://sbcnews.co.uk/europe/uk/2021/01/08/ukgc-opens-consultation-on-research-methodology/>



## Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2020 and January 2021

### SECTION 2: Australasian Gaming Council (AGC) Research Updates

#### AGC Research Update 238

##### **Gambling Harm - Time for Action**

The UK House of Lords Select Committee on the Social and Economic Impact of the Gambling Industry conducted an inquiry into the social and economic impact of the gambling industry. The authors hope that their recommendations will make gambling safer for all, but no less enjoyable for those who do participate safely.

The authors conclude that, although the political parties frame their proposed policies differently, it is clear that all four believe that major changes to the law on gambling are needed. The authors hope that the Government will urgently give effect to their recommendations, and that they will receive all-party support.

#### AGC Research Update 239

##### **Direct Marketing Experiences Among Individuals with Current and Lifetime Gambling Disorder**

This Norwegian study examined experiences with direct gambling marketing among individuals with either a current or lifetime gambling disorder.

The results of the study suggest that treatment for gambling disorder should address marketing. The apparent influence of marketing makes the lack of regulation problematic. This is especially so when considering that regulation of online marketing has been found to be significantly associated with reduced rates of gambling disorder.

#### AGC Research Update 240

##### **Training Gamblers to Re-think Their Gambling Choices**

This paper details an experiment designed to test whether a four-week online intervention to strengthen contextual analytical thinking in gamblers is effective in changing cognitions and encouraging safer gambling consumption.

#### AGC Research Update 241

##### **Gambling During the COVID-19 Pandemic**

The aim of this paper was to provide a summary of gambling activity and gambling risk levels during the COVID-19 period, using national-level longitudinal data and comparing levels to early 2019. Gambling declined significantly between April 2019 and May 2020 around the height of COVID restrictions. It increased again between May and November 2020 when restrictions began to be eased.



## **Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2020 and January 2021**

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### **AGC Research Update 242**

#### **Review of the Point of Consumption Tax on Wagering and Betting**

This review was prompted by concerns that the introduction of the new POCT taxation framework could affect the viability of the wagering and racing industries. It looks at the tax rate, tax-free threshold, the treatment of free bets and the payment of tax revenue to the Victorian Racing Industry (VRI).

### **AGC Research Update 243**

#### **Northern Territory Gambling Prevalence and Wellbeing Survey Report 2018**

This report was prepared by the Menzies School of Health Research for the Northern Territory Government. It was published in 2020.

The authors conclude that patterns of gambling in the NT are changing. Fewer people are gambling, but there are increases in the number of people experiencing problem gambling. A significant number of people are being harmed by someone else's gambling. Online gambling was also significantly associated with more problem gambling and harm from gambling.



## Gambling Harm - Time for Action

### UK House of Lords. Select Committee on the Social and Economic Impact of the Gambling Industry, July 2020

#### Overview

The House of Lords Committee conducted an inquiry into the social and economic impact of the gambling industry.

#### Background

The Gambling Commission's *Gambling Participation in 2019: behaviour, awareness and attitudes* report gave a broad overview of gambling participation in Great Britain.

According to this report, 47% of adults in the UK reported gambling at least once a month.

In 2012, 14% of people took part in online gambling. Seven years later the figure was 21%.

The [Budd Report](#) of 2001 laid out a blueprint for the liberalisation of gambling. This was accepted by the government and the Gambling Act 2005 was based on this report. The UK Gambling Act 2005 is currently under review.

The almost universal adoption of smart phones and other devices has enabled gambling 24/7 whenever and wherever the gambler wishes – totally unsupervised. The increasing accessibility of the internet, along with greater internet speed and download capability, enhance the capabilities of online gambling.

#### Aim of the Study

The authors aimed to come up with a list of recommendations to make gambling safer for all but, at the same time, not make gambling less enjoyable for those who participate safely.

#### Method

The work on this report was undertaken over 13 months. It was delayed by COVID-19.

- A "Call for Evidence" resulted in responses from 89 persons and bodies. A further 39 items of evidence were subsequently received,

- An informal seminar heard the views of a number of experts, and
- The Committee were given a presentation on different types of online gambling.

COVID-19 affected the data gathering as betting shops, casinos and sports venues were closed. Offline gambling virtually came to a standstill.

When betting shops reopen and the public can again attend sports venues, the authors feel there will be a resurgence of offline betting. It remains to be seen whether the relationship between offline and online betting will be anything like it was pre-COVID19.

#### Recommendations

The Committee made over 60 recommendations to address gambling addiction, and the effects on individuals and affected others.

Some are listed below. See the report for the full list and explanation.

#### Offline Gambling

- The Government should reinstate the triennial reviews of maximum stake and prize limits, and they should be extended to include both gaming machines and online gambling products.
- The Government should undertake an assessment of casino regulations, and apply the same regulations to all casinos, regardless of when they opened.

#### Online gambling

- The Gambling Commission should establish a system for testing all new games against a series of harm indicators, including their addictiveness and whether they will appeal to children. A game which scores too highly on the harm indicators must not be approved.
- The Government should work with the Gambling Commission to establish a category system for online gambling products.
- The Government and the Gambling Commission should use the online product categories to set stake limits for online gambling products.
- To ensure that the implementation of online stake limits does not lead to increased unregulated offshore gambling, the Government and Gambling Commission must work with payment providers and banks to establish a scheme to block payments to such operators.

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- There should be equalisation of speed of play and spin, so that no game can be played quicker online than in a casino, betting shop or bingo hall.

#### Regulation: Gambling Commission

- Fines currently imposed, and penalties agreed by the Gambling Commission, should reflect not just the seriousness of the offence but the size of the offender.
- The Government should conduct a triennial review of the work of the Gambling Commission.

#### Licensing of affiliates

- Affiliates should be licensed by the Gambling Commission before they can enter into contracts with gambling operators, and operators should not be permitted to enter into contracts with unlicensed affiliates.

#### The house edge

- Licence conditions should require the proportion of the stake retained by the house to be displayed prominently and clearly, in simple terms, on each gaming machine in all gambling premises, and in remote gambling.

#### Regulation by local authorities

- The Act should be amended to give licensing committees deciding on the licensing of premises for gambling the same powers as they already have when deciding on the licensing of premises for the sale of alcohol.

#### Gambling-related harm

- The British Gambling Prevalence Survey should be reinstated.
- The Government should commission a longitudinal survey to trace how and why individuals become problem gamblers, the actions they take, the treatment they receive, and the outcomes associated with problem gambling.

#### Suicide

- Guidance should be issued to doctors to be alert to asking patients who present with symptoms of anxiety and/or depression whether they have any gambling problems. If so, they should offer advice about where to seek specialist help.

#### Affordability checks

- The Gambling Commission must amend its Formal Guidance for Remote Gambling Operators to define the minimum steps operators should take when considering customer affordability.

- It should be a condition of gambling licences that where an operator's affordability check throws doubt on whether an individual can safely gamble at the rate they have been doing, this information should be shared with all other licensed gambling operators.

- Banks should work together with UK Finance to create an industry-wide protocol on blocking gambling payments, with at least a 48-hour cooling off period.

#### VIP schemes

- The Gambling Commission must closely monitor the working of the interim measures for the regulation of VIP schemes.
- The licence conditions for gambling operators must be amended to require them to undertake a thorough 'affordability and source of funds check' before admitting any new customer to a VIP scheme. Customers must be at least 25 years old.

#### Self-exclusion

- Licence conditions must require every operator who has been notified of an individual's self-exclusion, not to send any communications (not including those required by law) to that individual during the period of self-exclusion.

#### A duty of care

- The law should be amended to make an operator who contravenes provisions of the licence conditions and social responsibility codes, liable to action for breach of statutory duty for a customer who has suffered loss as a result of that contravention.

#### Disputes between customers and operators

- Set up a statutory independent Gambling Ombudsman Service. Membership of the service should be a condition of the grant of an operator's licence.

#### Children and young people

- Ministers should make regulations under section 6(6) of the Gambling Act 2005 specifying that loot boxes and any other similar games, are games of chance.
- The Gambling Commission and local trading standards officers should undertake regular age test purchases and visits in all land-based gambling venues such as betting shops, amusement arcades and National Lottery retailers. They should develop an appropriate age testing scheme for online gambling operators.

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**Minimum age for gambling**

- The minimum age at which an individual can buy any National Lottery product should be raised to 18.
- The minimum age at which an individual can take part in any online gambling should be raised to 18.

**Children at racecourses**

- The Gambling Commission and local trading standards officers should undertake more frequent age verification tests. The Gambling Commission should use the full range of enforcement action available to it, including large fines, licence reviews and revocation for those bookmakers repeatedly allowing underage individuals to place a bet.

**Advertising**

- The Government should commission independent research to establish the links between gambling advertising and gambling-related harm.
- Gambling operators should no longer be allowed to advertise on the shirts of sports teams or any other part of their kit. There should be no gambling advertising in or near any sports grounds or sports venues, including sports programmes.
- These restrictions should not apply to horseracing or greyhound racing.
- The social responsibility code of practice must be amended to prohibit licensees from offering bet to view inducements.
- Advertisements which are objectively seen as offering inducements to people to start or to continue gambling, or which create a sense of urgency about placing bets, should be banned.
- The licence conditions should be amended to prohibit operators from sending communications offering inducements to bet to individuals, unless they have agreed to take part in VIP schemes which satisfy the conditions currently in force or any stricter conditions which are imposed.

**Research, education and treatment**

- Ministers should exercise their powers to require the holders of operating licences to pay to the Gambling Commission an annual levy sufficient to fund research, education, and treatment, including treatment provided by the NHS.
- When considering the options for calculating the mandatory levy, DCMS officials should devise a formula requiring companies offering potentially more harmful gambling products to pay a correspondingly higher proportion of the levy.
- Gambling companies should make freely available to researchers, and to those commissioning

research, data sets with the information they have about those gambling with them online, and their communications with them (anonymised if necessary). Similar information in relation to those gambling offline should also be provided if it is available.

- The Government should commission an assessment of the long-term impact of teaching secondary school children about the risks related to gambling.
- Problem gambling is a common mental health disorder, and the NHS has the same duty to treat it as to treat any other disorder.
- The National Institute for Health and Care Excellence (NICE) should conduct an independent assessment of the various treatments available, and prepare guidelines showing which are the most effective.

**Lotteries**

- Lottery duty, should be replaced by gross profits tax.

**Conclusions**

A few of the recommendations can be implemented only by primary legislation. However, most need only secondary legislation, or changes in the Gambling Commission's licence conditions and codes of practice.

All three main UK political parties, and the Scottish National Party, have pledged to reform the law on gambling.

The authors conclude that, although the political parties frame their proposed policies differently, it is clear that all four believe that major changes to the law on gambling are needed.

The authors hope that the Government will urgently give effect to their recommendations, and that they will receive all-party support.

[Click here to access the full report](#)

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## Direct Marketing Experiences Among Individuals with Current and Lifetime Gambling Disorder

Syvertsen, A., Pallesen, S., Erevik, E. et al

Frontiers in Psychology, August 2020

### Overview

This Norwegian study examined experiences with direct gambling marketing among individuals with either a current or lifetime gambling disorder.

### Background to the Study

Previous research indicates that individuals with gambling disorder are disproportionately influenced by gambling marketing. However, very few studies have examined gamblers' experiences with direct marketing.

This association may be explained by disordered gamblers being more attentive to marketing or being more likely to receive it due to their gambling history.

Promotional marketing differs from traditional marketing. Traditional marketing aims to increase brand awareness, whereas promotional marketing aims to trigger action. Promotional marketing includes:

- Sign-up bonuses,
- Cash back, and
- Gambling credits.

Promotional marketing can be communicated directly to individuals by employing communication channels such as phone, texts and emails.

The authors note that combining promotional marketing with the use of direct communication channels is likely to be an especially potent form of influence. Gamblers report that promotional marketing influences them to increased gambling involvement, reduced perception of risk and increased impulsive betting.

Hing et al (2014) found that promotional marketing triggered gambling sessions and undermined efforts to stop gambling. It was further reported that promotions led to longer gambling sessions through increased availability of funds. Participants also reported promotions being tailored to their gambling history.

Studies specifically looking at direct marketing are lacking. This may be due to the fact that direct marketing is only available to selected recipients and is therefore harder to study.

Unregulated gambling operators are prohibited from marketing in Norway, but this is circumvented by advertising on television channels that are aimed at Norwegians (i.e., marketing using Norwegian language and content) but which are broadcast from abroad. Consequently, unregulated online gambling operators are well known and easily accessible for Norwegian customers.

### Aim of the Study

The study was guided by the research question:

*What experiences do individuals with current or lifetime gambling disorder have with gambling-related direct marketing with regards to:*

1. *the types of direct marketing experienced and their attitudes toward these types?*
2. *their interaction with direct marketing? and*
3. *the perceived influence from direct marketing?*

### Method

Semi-structured face-to-face interviews were conducted. 12 participants were recruited through self-help groups. The authors prioritised open ended and broad questions covering types of direct marketing, possible influences from direct marketing and interaction.

### Findings

Two overarching themes, with two and four subthemes respectively, were identified:

1. *"The types of direct marketing received and its relation to gambling behaviours"* covered participants' experiences with types of direct marketing received and under what circumstances and channels they received it.
2. *"Psychological distance to gambling determined the direct marketing experiences"* covered gamblers' experiences with direct marketing interactions, influence, and attitudes. That is, how the direct marketing participants received was reacted to and perceived.

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## The Types of Direct Marketing Received and Its Relation to Gambling Behaviours

### Common Bonuses and Free Spins

These were mentioned by all participants.

*"...it's always the same way, it's just, go make yourself an account or deposit money and get the 5-fold (bonus for the deposited amount), then you have to play for probably 30-fold (of the deposited amount) to be able to withdraw the winnings, right." (46-year-old woman, lifetime GD).*

Participants considered these promotions to be mass communicated and generic. Similar offers were communicated by unknown and familiar gambling companies (e.g. regardless of whether a participant played mainly casino games or not, direct marketing for casino games was a typical experience).

### Getting Special Treatment

Participants described how increased engagement with gambling companies led to changes in promotions such as bonuses and free spins and receiving new forms of direct marketing. Turnover requirements related to bonuses were lowered, and free credit was increased.

A few had experiences with custom arrangements in which they were returned a fixed percentage of losses over a given period, i.e. "cash back." Losing large amounts of money with certain casinos could result in substantial amounts of free credit too.

Phone calls were reported less frequently compared to other channels of direct marketing. Direct marketing through phone calls might involve simple invitations to participate in marketing surveys or information about bonus offers. Experiences with phone calls more often entailed a more personal quality and involved tailored or specific offers. Participants stated that they were addressed by name and that the callers referred to special events such as holidays or birthdays.

Many participants had experienced what can be regarded as special and, in some cases, extravagant offers e.g. sponsored dinners with other valued customers, attendance to parties with celebrity ambassadors, sponsored trips to foreign countries, free access and means to attend gambling events, sponsored gambling cruises, and items such as gift cards. Such special offers were reported by seven participants, and their accounts revealed that they had high engagement with the company in question.

The participants interpreted these offers as being due to their loyalty. One participant who received both dinner and party invitations from her gambling company of choice surmised:

*"...I just assume that I used a lot of money to play so I entered into some sort of VIP thing" (55-year-old woman, lifetime GD).*

How participants were influenced by, and interacted with, special offers depended on how the participants related to their own gambling problems.

### Psychological Distance to Gambling Determined the Direct Marketing Experiences

This theme captures how experiences with direct marketing were found to be related to how psychologically distanced the participants were to their own gambling problems and to gambling overall.

### Assisted by and Using Direct Marketing

Participants interacted differently with direct marketing offers. Half of the sample made use of them as they came, while the other half actively sought out more (or better) offers as well. Collectively these descriptions indicated that some marketing techniques allowed them to sustain gambling beyond what would otherwise be possible. Bonus offers extended gambling funds, and free spins and free credit allowed for gambling even when the person was broke.

Some took advantage of how marketing was tailored to their activity by deliberately switching between companies to get better offers.

### Becoming Part of the Problem

All but one participant explicitly said that direct marketing influenced them during active play periods. Influence from, and interaction with, direct marketing was reported to be intimately linked to gambling disorder.

A few participants noted that direct marketing could also trigger gambling urges indirectly by reminding them of gambling in general - even if the participant did not make use of the specific offer. Free credit and free spins were emphasised by many participants as causing increased gambling or triggering gambling urges.

Several participants reported that they tried to conceal their direct marketing use along with their overall gambling behaviour. None of the participants who received special offers to attend sponsored dinners, parties, cruises, or trips to foreign countries accepted these offers. Probing questions revealed that one reason was the concern that others would learn of their gambling if they attended.

### Direct Marketing as Predatory

Many participants experienced direct marketing as negative and/or incessant. Those with lifetime gambling disorder mostly talked about direct marketing in a

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negative way (e.g. bonuses were perceived as trickery because the turnover requirements were seen as very high, making net gains unlikely. Free spins were also seen as being of little importance).

Many stated that they had or were experiencing overwhelming amounts of direct marketing, which made them angry or annoyed, and they described the marketing as aggressive and constant. Most could not recall giving permission for direct marketing, but also stated that they might have done so carelessly when signing up for gambling sites.

#### Disengaging with Direct Marketing

Participants with lifetime gambling disorder and long abstinence stated that direct or indirect marketing exerted little current influence in terms of eliciting gambling urges or increasing self-perceived risk of relapse.

However, one participant stated that marketing could still trigger gambling urges, which he handled by playing social gambling games with fake money.

Current influence was generally perceived in a way that indicated that marketing had lost its significance, leaving just the negative attitude. Thus, the gamblers did not speak of any need to actively exercise coping behaviour anymore. Even substantial offers were ineffective.

Another gambler had recently started to deal with his problems and stated that the marketing influence was dependent on whether or not he was in "resistance mode" or "play mode." One had been abstinent for a few weeks and stated that direct marketing could still trigger urges to play, although he resisted by focusing on the negative consequences of gambling.

When considering concrete strategies, the most frequent reported was to either attempt to exclude oneself from the gambling company/site or to dispose of the emails, letters, and texts as soon as they came. A few noted that they ended up opening a new email account in order to avoid direct marketing.

#### Discussion and Conclusions

Two key findings in the study were that:

- 1) the marketing experiences were intimately connected to the participants' overall gambling behaviour as well as to their relationships to their own gambling problems, and
- 2) that direct marketing was an interactive form of marketing, both in itself and through the promotions it contained.

#### Types of Direct Marketing and Attitudes

The close connection between direct marketing and online gambling manifested itself in two ways.

- 1) Direct marketing was conducted through online channels and was used to direct the potential gambler to online gambling opportunities.
- 2) Direct marketing by email was perceived as especially well-known and generic, which has its own set of implications.

Access and availability can be understood as prerequisites for the development of gambling disorder. The participants' experiences with direct marketing types appear relevant to both.

Direct marketing was experienced as overwhelming and aggressive by the participants. In terms of access, the combination of direct and promotional marketing seems important (e.g. the finding that some participants received free credits when they were inactive could be regarded as intrusive).

#### Influences and Interactions with Direct Marketing

Participants reported that direct marketing had influenced them by increasing their gambling. The effect on their gambling was generally described as greater than for indirect marketing, with some explaining that the tailoring and personalisation of the direct marketing made them feel special.

Participants who had been abstinent for long periods of time noted how marketing lost its significance, and they had more negative attitudes toward the offers. This implies that the role of marketing as a discriminative stimulus had changed. Understood in this way, longer periods of abstinence might weaken cue-reactive responses, which will not only reduce urges but also avoid the activation of cognitive biases.

#### Implications for Treatment and Regulation

The results of the study suggest that treatment for gambling disorder should address marketing. The apparent influence of marketing makes the lack of regulation problematic. This is especially so when considering that regulation of online marketing has been found to be significantly associated with reduced rates of gambling disorder.

Direct marketing should be of interest to policy makers because it potentially has a stronger impact on gamblers than indirect marketing.

The study provides insight into particularly intense marketing experiences among a group that has previously been found to be more influenced by gambling marketing than other gamblers.

[Click here to access the full report](#)

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Number 240, December 2020

## Training Gamblers to Re-think Their Gambling Choices: How Contextual Analytical Thinking May Be Useful in Promoting Safer Gambling

Armstrong, T., Rockloff, M., Browne, M. and Blaszczynski, A.

Journal of Behavioural Addictions v.9(3), October 2020

### Overview

This paper details an experiment designed to test whether a four-week online intervention to strengthen contextual analytical thinking in gamblers is effective in changing gamblers cognitions and encouraging safer gambling consumption.

### Background

Harmful gambling has been associated with the endorsement of false perceptions that promote excessive consumption. These types of beliefs stem from assumptions about gambling that are fostered by fast-thinking and a lack of objective, critical thought.

### Aim of the Study

The authors hypothesised that participants who received the analytical training task would report fewer erroneous and more protective cognitions, and reduced gambling consumption (measured by a decrease in time and money spent gambling).

### Method

Ninety-four regular gamblers who reported experiencing gambling-related harm were randomly allocated to either an experimental or control condition. 48 of these were female. Ages ranged from 19 to 65.

Based on responses to the Problem Gambling Severity Index (PGSI):

- 46% met the criteria for problem gambling,
- 29% for moderate-risk gambling and 9%, and
- 10% were classified as low-risk or non-problem gamblers.

The most popular forms of gambling were:

- EGMs (32.9%),

- sports betting (21.2%),
- blackjack (17.1%), and
- poker (16%).

EGMs were also the mode of gambling on which players spent the most time (31%), and money (30.9%).

Baseline measurement of gambling beliefs and prior week gambling consumption were measured.

The Gambling Related Cognition Scale and the Protective Gambling Beliefs Scale were used to measure participants cognitions about gambling.

Questions regarding prior week gambling asked participants to report the amount of time and money they spent gambling in the week prior to the survey and during a typical gambling session that same week.

The study consisted of six waves of data collection:

1. A baseline survey designed to capture pre-intervention measures of gambling beliefs and gambling participation, as well as broader gambling involvement (problem gambling severity, gambling consumption, and gambling preferences) and demographics (age and gender),
2. 4 weekly surveys, and
3. A post-intervention phase.

Following the baseline survey questions, the participants were presented with the first intervention task. This involved completion of an analytical training task designed to educate participants on common judgement errors specific to gambling. The intervention task was an extended form of the Gambler's Fallacy Questionnaire (GFQ), designed to tap into common fallacies associated with gambling.

An additional 40 items were developed that challenged people's knowledge of these common gambling fallacies.

Immediately following their response, participants were provided performance-based feedback informing them of whether they were correct. They were also provided with a detailed explanation of the reason(s) underlying the correct response.

Once all questions had been attempted, they were given the opportunity to revisit the questions they answered incorrectly to provide a revised answer based on the feedback they had received.

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The control group also received a different set of ten questions. Their questions assessed knowledge of general gambling trivia. They were not provided with any feedback.

The weekly surveys were administered starting one week after baseline. They measured participants prior week gambling involvement and provided them with the relevant task (i.e., either the extended GFQ, or Gambling-trivia).

In week five, participants received the post intervention survey which re-assessed participants gambling beliefs and prior week gambling, as well as some sociodemographic characteristics.

### Findings

Results showed no significant differences between experimental conditions for any **changes in beliefs** from baseline to week 5, except for predictive control.

In the control condition, there were no significant differences between baseline and week 5 for **minutes per week gambling**. However, as expected, there was a significant difference in minutes per week gambling from baseline to week 5 for the experimental condition.

There were no significant differences between baseline and week 5 scores for **minutes spent gambling in a typical gambling session** for the control condition. However, the experimental condition spent significantly less time gambling at week 5 compared to baseline during a typical gambling session.

There were no significant differences in the **total amount spent per week gambling** between baseline and week 5 for the control condition or the experimental condition.

There were no significant differences in the **amount spent on a typical gambling session** between baseline and week 5 for the control condition or the experimental condition.

### Discussion

The results suggest that the intervention:

- made for stronger changes to beliefs relating to predictive control, compared to the control group,
- reduced endorsement of other erroneous cognitions (e.g., inability to stop gambling and interpretation of gambling outcomes), and
- promoted safer cognitions about gambling.

Despite non-significant results for monetary expenditure, the intervention was effective in reducing the amount of time people spent gambling compared to baseline. However, changes in time spent gambling were not significantly different when comparing controls to the experimental condition.

Prolonged training that challenges gambling fallacies may cause people to question their gambling choices, making gambling less enjoyable and encouraging people to quit sooner.

It has been suggested that reduced enjoyment should equate to greater risk aversion e.g., smaller bets (Wohl et al., 2007). Since games of chance tend to have a negative expected value in the long term, a reduction of time spent playing could naturally equate to a reduction in gambling losses and reduced gambling expenditure.

However, this was not the case in the current study. The authors speculate that it may be that a reduction in the level of enjoyment (as a result of more rational approaches to gambling), may encourage people to gamble more money in an attempt to make gambling more exciting.

Given that the intervention failed to change gambling expenditure, it would be premature to argue that the results support such an intervention being adequate in generating and sustaining long term behavioural changes that reduces gambling related harm by itself.

The authors state that it is likely that cognitive interventions that challenge biased decision making would benefit from the addition of other strategies (such as behavioural feedback) that provide gamblers with realistic accounts of their actual gambling expenditure. This would allow them to recognise behavioural patterns and to moderate play.

Interventions to strengthen decision-making skills that are based on reflection, critical thought and reality checking, are likely to provide greater control over gambling decisions and increase the effectiveness of behavioural strategies for reducing gambling consumption.

Gamblers do not necessarily lack the statistical knowledge underpinning many gambling concepts, nor are they absent of insight into the irrationality of their beliefs. This suggests there is more at play than simply a lack of knowledge regarding mathematical components of probability and chance hindering behavioural changes.

Interventions that place all the responsibility on the consumer, and fail to acknowledge other factors that

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influence decision making beyond personal control, are likely to be ineffective and contribute to gambling stigma.

### Conclusions

The authors conclude that cognitive interventions that encourage gamblers to challenge gambling beliefs, by reflecting on gambling involvement and promoting critical thinking, may be an effective tool for reducing the time people invest in gambling activities.

Interventions that encourage people to challenge beliefs by providing conflicting evidence, removing blame and stigma, and that explain how and why these justifications are tempting, are likely to be more effective in promoting cognitive changes.

Early cognitive interventions designed to promote greater reflection and challenge biased gambling decisions are likely to encourage safer gambling consumption and have positive implications for treatment-seeking by those who need help controlling gambling urges.

Interventions that are digitalised and can be accessed via the Internet means they can be administered to a wider network of gamblers, and eliminate the stigma or shame associated with accessing formal treatment services.

The authors further conclude that future research should consider looking at causation regarding changes to thinking style, gambling beliefs and gambling consumption, and explore the long-term impacts of a training-type intervention.

Further, exploration as to how the intervention may be adapted or incorporated into other harm reduction strategies is necessary to achieve the goal of alleviating gambling related harm.

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## Gambling During the COVID-19 Pandemic

Biddle, N.

Australian National University (ANU), December 2020

### Background

The COVID-19 pandemic affected almost all aspects of life in Australia. The physical health impacts of COVID-19 are only a small part of the overall effect of the pandemic. One aspect of life that has potentially been impacted is gambling.

On one hand, during lockdown periods the opportunity to gamble in venues has been severely restricted. This has potentially reduced the opportunity for certain forms of gambling activity. Some sporting events that many people are likely to gamble on have also been disrupted.

On the other hand, as people have spent more time at home, the opportunity to participate in online gambling has increased.

### Aim of the Study

The aim of this paper was to provide a summary of gambling activity and gambling risk levels during the COVID-19 period, using national-level longitudinal data and comparing levels to early 2019.

### Method

The paper is primarily based on the May and November 2020 ANU polls (the 38<sup>th</sup> and 44<sup>th</sup> waves of data collection on the "Life in Australia" panel) which collected information from over 3,000 respondents aged 18 years and over, across all eight states and territories in Australia.

The Life in Australia panel are tracked through time, with 94.7% of those who completed the November survey also having completed the May survey.

Community attitudes towards gambling prior to the pandemic were looked at, as were changes in measures of problem gambling from April 2019 to November 2020.

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### Findings

#### Gambling Prevalence/Type

Results show that between April 2019 and May 2020 there was a sharp decline in the number of Australians who said they had gambled in the previous 12 months.

Around 52.9% of Australians were estimated to have gambled at the start of the pandemic, compared to the pre-pandemic rate of 65.9%. By November 2020, gambling rates had increased slightly to 58.7%.

The decline in gambling rates was relatively consistent for males and females. There was a much larger decline in those aged 35-45 when compared to other age groups.

Gambling rates are back to close to what they were pre-pandemic for those aged 18-24 years and those aged 75+. However, for the 25 – 54 age group in particular, gambling rates are still well below the April 2019 levels.

Prior to COVID-19, those in disadvantaged areas were more likely to have gambled. However, between April 2019 and May 2020, the largest decline in gambling occurred in these disadvantaged areas – from 73.5% to 57.7%.

By November 2020, respondents living in the most and least disadvantaged areas were the only ones that still had lower rates of gambling participation than prior to the spread of COVID-19.

Using population estimates, results suggest that roughly 2.6 million fewer Australians gambled in the 12 months leading up to May 2020 than would have done if the April 2019 gambling prevalence levels continued into the COVID-19 pandemic.

The biggest decline in gambling prevalence between April 2019 and May 2020 was for informal games (e.g. cards, snooker) which declined from 2.0% to 0.8%. The smallest decline was for online games which declined from 1.3% to 1.2%.

No form of gambling increased between April 2019 and May 2020.

It is estimated that there were:

- 2.7 million fewer adult Australians who bought raffle tickets,
- 1.7 million fewer adults who played a lottery game, and
- 1.6 million fewer adults who played poker machines or gaming machines at a venue.

Between May and November 2020, eight of the eleven forms of gambling increased. The greatest increase was for horse/greyhound racing. This, along with lotteries, were now close to levels pre-COVID.

(See Table 1, p.3)

#### Attitudes to gambling

In April 2019 respondents were asked a range of questions regarding their views on gambling. The statements with the highest level of agreement were those that were moderately negative towards gambling i.e. there are too many opportunities, it is dangerous for family life and it should be discouraged.

The three statements that had the lowest level of support were strong positive statements i.e. gambling is good for society, gambling livens up life and most people gamble sensibly.

Only 36.5% of respondents supported the view that gambling should be banned entirely. 56.8% agreed that people should have the right to gamble if they want to.

#### Problem gambling

Rates of problem gambling declined significantly between April 2019 and May 2020. This was true particularly for females and those with relatively high levels of education.

The rates then increased again by November 2020, although this was still below the pre-COVID baseline.

The authors state that in April 2019, 13.6% of Australian adults were estimated to be at risk of problem gambling. By November 2020, this was 10.3%. Not only have gambling levels declined during COVID-19, it appears that at-risk gambling has also declined for those who continue to gamble.

#### Gambling and wellbeing

Life satisfaction in November 2020 was shown to be slightly higher than in January 2020, and slightly below life satisfaction in October 2019.

The authors' results show that those who gambled at all during the pandemic, had a more positive change in life satisfaction than those who did not. Those who had experienced gambling problems in the 12 months prior

to the survey had a more negative change in life satisfaction.

#### Conclusions

The authors concluded by stating that Australia has one of the highest rates of gambling losses in the world, and that COVID-19 has led to dramatic changes in people's lives.

Gambling declined significantly between April 2019 and May 2020 around the height of COVID restrictions. It increased again between May and November 2020 when restrictions began to be eased.

However, gambling rates in November 2020 were still significantly lower than those observed prior to the pandemic.

In addition, there was a decline in problem gambling for the entire population as well as those who continued to gamble during the period.

The authors finish by stating that the COVID-19 pandemic has given an opportunity to reset a range of habitual behaviours that were causing harm.

There is an opportunity to take advantage of these changes in problem gambling to make sure that old habits aren't picked up again. There is also an ongoing need to identify those who may have started problem gambling during the period and intervene before those behaviours become entrenched.

[Click here to access the full report](#)

**Table 1** Gambling prevalence by type of gambling – April 2019, May 2020 and November 2020

Type of gambling	April 2019	May 2020	November 2020
Played poker machines or gaming machines at a venue	17.4	9.3	9.6
Bet on horse or greyhound races, excluding sweeps	14.3	8.5	13.4
Bought instant scratch tickets	18.9	14.8	16.4
Played a lottery game like Tattslotto or Powerball	46.4	37.8	42.1
Played Keno	7.4	4.3	5.0
Played table games such as blackjack, poker, or roulette at a casino	5.1	2.4	1.8
Played bingo or housie	2.8	1.2	1.2
Bet on a sporting or special event like football, cricket, tennis, a TV show, or election	7.1	4.1	5.2
Played informal games like cards, mah-jong, or snooker for money	2.0	0.8	0.9
Bought raffle tickets	33.1	19.4	20.9
Played pokie games or other casino games online for money	1.3	1.2	0.6
<b>Any form of gambling for money</b>	<b>65.9</b>	<b>52.9</b>	<b>58.7</b>

Notes: The estimated standard errors for these estimates are available in Appendix Table 1.

Source: ANUpoll, April 2019, May 2020 and November 2020.



Number 242, January 2021

## Review of the Point of Consumption Tax on Wagering and Betting

Victoria. Department of Treasury and Finance, November 2020

### Overview

This review was prompted by concerns that the introduction of the new POCT taxation framework could affect the viability of the wagering and racing industries. It looks at the tax rate, tax-free threshold, the treatment of free bets and the payment of tax revenue to the Victorian Racing Industry (VRI).

The preparation of the review and consultations with stakeholders was led by the Department of Treasury and Finance, on behalf of the Treasurer.

### Background

In the 2017-18 Budget, the Victorian Government announced it was developing a Point of Consumption Tax (POCT) on wagering and betting, in order to better align Victoria's wagering tax system with the increasingly digital betting environment. The POCT was introduced at a rate of 8% of Victorian net wagering revenue earned above an annual tax-free threshold of \$1 million.

The difference in tax burden between online bookmakers and Tabcorp created an uneven playing field. It allowed an environment in which online bookmakers could expand rapidly without being taxed in Victoria. This resulted in declining Victorian wagering tax revenue despite ongoing growth in Victorian wagering activity.

Online bookmakers also made a lesser contribution to the Victorian Racing Industry (VRI) than the Victorian wagering and betting licensee (Tabcorp).

A key consideration in assessing the effects of introducing the Victorian POCT was whether the tax impacted the breadth of product offerings, odds offered to consumers or the level of generosities offered to customers (including free bets or other incentives to place bets).

### Aim of the Study

The review analysed the effect of the POCT on wagering operators, the racing industry in Victoria and Australia's major sporting codes. It considers the effect

of the tax on wagering and betting during the first 12 months following its implementation. (This precedes the COVID-19 pandemic.)

The Government will consider the findings of the review and the ongoing effects of the coronavirus (COVID-19) pandemic on the wagering and racing industries.

### Findings

The report finds that the cautious approach of setting the POCT at 8% with a \$1 million threshold, had the intended effect of creating a level playing field for all wagering operators. At the same time it ensures wagering industry viability and the VRI continuing to generate wagering-related revenue.

**Finding 1**  
*The introduction of the POCT has not affected the growth in wagering operators' net wagering revenue on VRI events.*

Corporate bookmakers did not previously pay wagering and betting tax on Victorian bets, thus the POCT represented a new charge on their operations.

Since the introduction of the POCT, large corporate bookmakers have responded by increasing their margins on wagering products.

Evidence provided by stakeholders to this review suggests that since the POCT implementation, wagering operators have adapted by increasing overrounds. (factoring in a profit margin on the prices offered by bookies) This has broadly been by around 2 to 3 percentage points on racing products, and by a lesser degree on sports products. This change appears to have occurred quickly.

Evidence is still emerging of the effects of the POCT on operating costs as a whole. However, data collected by Nielson suggests that advertising expenditure by wagering operators fell in 2019, after several years of strong growth. Evidence suggests that much of this effect is attributable to the POCT.

Figures suggest that since the introduction of the POCT, major corporate bookmakers have maintained steady growth in wagering turnover and high levels of growth in net wagering revenue. The profitability of corporate bookmakers in 2019 was in a broadly similar position to 2018.

The report finds that there is scope to increase the tax rate without threatening the viability of large wagering operators.

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The Victorian wagering and betting licensee (Tabcorp) has been unaffected by the POCT. Tabcorp's Victorian arm already paid tax under the previous wagering tax framework and only saw a minor increase in its wagering tax liability.

Recent changes to lotteries have made jackpots harder to achieve, leading to higher jackpots and a significant increase in gambling on lotteries. It is not yet clear whether some of this increase in lottery revenue may have been a substitution away from wagering activity, as opposed to other non-gambling activity.

In its submission, the VRI argued that a decline in turnover and increasing operator margins would eventually result in a decline in net wagering revenue. However, the review has found that growth in net wagering revenue has not declined under the POCT.

**Finding 2**  
**The introduction of the POCT has impacted racefield fees based solely on turnover, but has not diminished the ability for racing codes to generate revenue through well-structured racefield fees.**

Racefield fees have been a rapidly growing source of funding, contributing:

- over 40% of Racing Victoria's revenue,
- over 35% of Greyhound Racing Victoria's revenue, and
- almost 20% of Harness Racing Victoria's revenue in 2018-19.

Where fees are charged based on turnover, it is possible for operators to be required to pay racefield fees even on days where they make a loss.

While the POCT was only in place for half of the most recent financial year (2018-19), there appears to have been a reduction in racefield fees for the codes that rely purely on turnover-based fees (GRV and HRV) compared to a greater reliance on revenue-based fees (RV).

**Finding 3**  
**The VRI POCT payment of 1.5% of taxable net wagering revenue (18.75% of tax revenue) has adequately compensated the VRI for the direct effects introducing the POCT had on revenue from wagering and betting.**

There was a slower level of growth in wagering turnover (the total amount of bets placed), but no reduction in the growth of net wagering revenue (turnover slowdown was offset by higher margins per bet).

Subdued wage growth may have been a drag on wagering products in general, including wagering on Victorian racing products.

In addition, the drought, bushfires, smoke haze, thunderstorm/lightning and heatwave activity in late 2019 and early 2020 led to the cancellation of racing events, fire damage at some racetracks, and may have reduced attendance at other race meetings.

Victoria implemented the lowest rate of POCT of all jurisdictions (excluding the Northern Territory).

See Table p. 3

Victoria's rate was set relatively low at 8% in order to take account of the total burden placed upon operators from taxes and fees. Victorian racefield fees are the highest in the country. The VRI generates 20-30% more fees than the racing industry in all other jurisdictions.

**Finding 4**  
**The \$1 million tax-free threshold has reduced the regulatory burden of the POCT on small operators without significantly reducing tax revenue.**

Data available from some sports codes showed that in the POCT's first year of operation, wagering revenue fell, but so did operators' margins. The imposition of a tax would be expected to increase operators' margins as they look to pass the tax on through lower odds.

It appears that this period coincided with an unusually poor set of results for wagering operators on those sports codes. Therefore, it is not possible with the current data to show what (if any) effect the POCT may have had on wagering activity on sports events, or on product fee revenue.

Some sections of the sports industry have called for a proportion of POCT revenue to be paid to the sports industry or to specific sports, both in Victoria and interstate, similar to payments to racing industries.

As the POCT does not appear to have had any negative affect on the revenue of sports controlling bodies, there is no clear rationale to extend those protections to sports bodies.

The profitability of large wagering operators does not appear to have been adversely affected by the POCT. There is no evidence that the current rate of POCT is unsustainable, or that increasing the rate would put large corporate bookmakers out of business.

Low-margin operators may have to increase their margins more substantially to remain profitable, losing their edge as a low-margin operator.

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On current evidence, there has not been any significant consolidation of medium-sized or low margin operators under an 8% POCT. It would appear that a modest increase to the POCT (e.g. aligning with New South Wales at a rate of 10%) would not be likely to make a material difference to the current environment.

The review finds that Victoria's decision to impose an 8% POCT rate was an appropriate initial setting, as the cautious approach to setting the POCT has had the intended effects to date i.e. not inhibiting wagering industry viability and ensuring the VRI is no worse off.

The Victorian POCT includes a \$1 million annual tax-free threshold for all wagering operators, which is intended to ensure the viability of small operators, particularly on-course bookmakers. Based on stakeholder feedback, if the annual tax-free threshold was reduced to \$500,000 it is unlikely any additional operators would become liable for the POCT.

However, a reduction is also likely to stifle the ability for on-course bookmakers to expand their operations and gain revenue of close to the current \$1 million threshold.

**Finding 5**  
*The inclusion of free bets in the calculation of POCT liabilities has not significantly affected their use and should be maintained.*

Since the introduction of the POCT, the broad use of free bet offers is still prevalent in Victoria. Some operators reported significant growth in free bets throughout 2019. This suggests the current tax treatment does not create a significant burden on wagering operators' ability to continue offering free bets.

The review finds the treatment of free bets under the Victorian POCT has not had a major impact on the commerciality of offering free bets or running other betting promotions.

**Finding 6**  
*Determining whether a bet is made in Victoria based on the physical location (geo-location) of the customer at the time of placing the bet, does not create a significant burden on operators.*

The review finds that the determination of location should continue to be based on the physical location of the customer when placing a bet (where physical location can reasonably be determined).

The Government expects that, within reason, all operators should be building the capability to track the location of each bet, to enable the calculation of

wagering tax based on customer location and not the customer's registered address.

**Finding 7**  
*Minor legislative amendments could improve the operations of the POCT, including the usage of foreign currency and other minor clarifications, as well as adding a requirement that operators report wagering revenue and POCT liabilities split by racing and sports events.*

Stakeholders have reported that the replacement of the previous wagering and betting tax regime has resulted in less data being available for policy analysis.

There is no current requirement for operators to report their split of products by event type.

[Click here to access the full report](#)

**POCT settings in each Australian jurisdiction as of January 1, 2020**

Jurisdiction	Commencement Date	Tax rate	Tax-free threshold	Racing Industry funding arrangements introduced
Victoria	1 January 2019	8 per cent	\$1 million	• 18.75 per cent of POCT revenue
New South Wales	1 January 2019	10 per cent	\$1 million	• 20 per cent of POCT revenue
Queensland	1 October 2018	15 per cent	\$300,000	• QLD Govt. relieved Racing Queensland of \$17.8 million debt • \$20 million infrastructure funding for greyhound/harness racing • \$26 million prizemoney funding
South Australia	1 July 2017	15 per cent	\$150,000	None announced
Western Australia	1 January 2019	15 per cent	\$150,000	• 30 per cent of POCT revenue
Tasmania	1 January 2020	15 per cent	\$150,000	• 80 per cent of POCT revenue
Australian Capital Territory	1 January 2019	15 per cent	\$150,000	None announced
Northern Territory	No POCT	N/A	N/A	N/A

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Number 243, January 2021

## Northern Territory Gambling Prevalence and Wellbeing Survey Report 2018

Charles Darwin University,  
Menzies School of Health  
Research, November 2019

### Overview

This report was prepared by the Menzies School of Health Research for the Northern Territory Government. It was published in 2020.

The results will be of interest to regulators, government policy makers, public health and public policy researchers, counselling services, non-government organisations, industry, and the broader community.

### Aim of the Survey

The primary aim of the 2018 Gambling Prevalence and Wellbeing Survey is to inform government on the latest patterns of gambling participation, problem gambling prevalence, gambling harm and community attitudes to gambling policy and regulation in the NT. It also aims to compare 2018 with findings from the 2015 survey.

### Method

A telephone survey was carried out from October to December 2018. The survey contained over 100 questions covering:

- gambling participation,
- problem gambling risk,
- EGM gambler specific questions,
- questions on gambling policy and regulation and impacts,
- negative consequences because of own gambling and help-seeking behaviour,
- negative consequences because of another person's gambling and help-seeking behaviour,
- community attitudes to gambling,
- EGM load-up limits and EGM numbers in hotels, and clubs,
- health risk factors, and
- sociodemographic and socioeconomic factors.

### Findings

#### Gambling Participation

Annual gambling participation declined significantly between 2015 and 2018 in the NT adult population:

- for any gambling, down from 76% to 72%,
- raffles from 43% to 37%,
- EGMs from 23% to 19%,
- keno from 25% to 22%,
- racetrack betting from 23% to 17%, and
- casino table games from 13% to 9%.

Annual gambling participation increased significantly between 2015 and 2018 in the NT adult population for non-sport betting (e.g. betting on events such as an election outcome or Logie winner) from 0.3% to 0.7%.

There was no statistically significant change in annual gambling participation between 2015 and 2018 in the NT adult population for:

- lotteries (from 46% to 48%),
- instant scratch tickets (from 18% to 16%),
- sports betting (from 8% to 7%),
- informal games such as cards or pool (steady at 3%), bingo (steady at 2%), and
- other gambling (from 0.5% to 0.3%).

Compared with other jurisdictions in Australia, participation in keno (except Tasmania) and casino table games was higher in the Northern Territory.

#### Problem gambling risk in the NT

In 2018, 15% of NT adults were *at-risk* of problem gambling (as measured by the PGSI). The 2018 **problem gambling** prevalence in the NT adult population was 1.37%. This was an increase from 0.7% in 2015. The prevalence of **moderate risk** of problem gambling was 3.55%, and **low risk** of problem gambling 9.36%.

The NT has the highest rates of problem gambling, moderate risk and low risk problem gambling compared with the most recent estimates from other Australian jurisdictions.

Demographic and socioeconomic factors associated with a significantly increased risk of problem gambling among gamblers were:

- being male (2.7%),
- 18-30 years (2.8%),
- 50-64 years (2.9%),
- Aboriginal (5.3%),
- unemployed (2.4%), and
- living in a group household (4.3%).

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Health risk factors associated with a significant increase in problem gambling among gamblers were:

- having an alcohol problem (3.7%),
- smoking inside most or all the time (8%),
- very high psychological distress (5.3%), and
- using drugs illicitly (2.9%).

More than 50% of weekly EGM gamblers were classified as experiencing problem gambling or moderate risk of problem gambling.

#### Negative consequences (or harms) from own gambling for at-risk gamblers and help-seeking

Negative consequences/harms were classified as:

- financial e.g. run out of money for food, raided savings,
- psychological/emotional e.g. felt ashamed or had regrets, felt depressed,
- relationships and family e.g. relationship problem with family or friends, physical/verbal violence, and
- work/study e.g. missed work or study classes, underperformed.

In 2018, 76% of at-risk gamblers identified at least one negative consequence that occurred because of their own gambling (up from 56% in 2015). Experience of a negative consequence from own gambling was significantly associated with problem gambling risk.

100%, 68% and 27% of people experienced problem, moderate and low risk gambling respectively, identifying at least one negative consequence.

Negative consequences associated with psychological/emotional distress were most endorsed by at-risk gamblers. 22% endorsed 'felt ashamed or had regrets' as occurring monthly.

Sports betting, racetrack betting and EGMs were significantly associated with an increased likelihood of experiencing a negative consequence because of own gambling among at-risk gamblers.

Gamblers experiencing problem gambling endorsed all negative consequences at significantly higher rates than gamblers experiencing moderate or low risk problem gambling.

Only 2% of at-risk gamblers sought some type of help for their gambling. This was significantly associated with problem gambling risk, increasing to 13% for those experiencing problem gambling.

Given there are around 2,500 gamblers in the NT experiencing problem gambling, there is significant

opportunity to better educate gamblers about the services available.

#### Negative consequences (or harms) because of another person's gambling

8% of NT adults indicated they had been negatively affected by another person's gambling. This was significantly less than in 2015 (13%).

The negative consequences most endorsed by people harmed by someone else's gambling were related to psychological distress.

- 4% 'Felt stressed or anxious',
- 3.9% had relationship problems with family/friends,
- 2.9% 'Ran out of money for rent or mortgage',
- 2.8% 'Ran out of money for bills',
- 2.6% 'Borrowed money from family/friends', and
- 2.5% 'Felt ashamed or had regrets'.

Relationships to the person whose gambling caused the harm was friend (23%), parent (15%), spouse (12%), ex-partner (10%), sibling (8%) and child (6%).

Of those people negatively affected by another's gambling, the type of gambling most implicated was EGMs (71%). This was followed by racetrack betting (17%), sports betting (6%) and casino table games (6%).

Of those harmed by another's gambling, 21% sought help. This was significantly higher among women (28%) than men (14%).

The most common types of help sought for those affected by someone else's gambling were friend (11%), social worker or psychologist (7%), family member (7%), and general practice doctor (6%).

#### Community attitudes to gambling and EGM numbers in the NT

Those wanting a decrease in the number of EGMs in hotels went from 50% in 2015 to 56% in 2018. The increase in percentage was significant for men - 45% in 2015 to 51% in 2018.

Those wanting a decrease in the number of EGMs in clubs went from 53% in 2015 to 55% in 2018.

Women were significantly more likely than men to want to see a decrease in EGM numbers in hotels (51% men, 60% women) and clubs (51% men, 58% women).

People who were negatively affected by someone else's gambling were significantly more likely to want a

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decrease in EGM numbers in hotels (73%) and clubs (76%).

Over 60% of adults agreed or strongly agreed with the statement there is too much gambling in NT hotels. Women (68%) were significantly more likely than men (55%) to agree or strongly agree.

Those negatively affected by someone else's gambling were significantly more likely to agree or strongly agree that there is too much gambling in NT clubs (74%) and hotels (69%).

Just over 70% of adults agreed or strongly agreed with the statement that there should be set limits on time and money played on EGMs.

#### Effects of gambling policy and regulation on gamblers and EGM gamblers

30% of monthly gamblers indicated that they are spending more money as a result of the installation of note acceptors. Among monthly EGM gamblers classified as problem gamblers, this increased to 68%.

49% of monthly EGM gamblers, who endorsed at least one harm because of their own gambling, were more likely to say the change to note acceptors increased their spending.

Monthly EGM gamblers were asked about their largest load-up into an EGM in the past year. 77% indicated it was \$100 or less. 10% indicated \$301 or more.

Of the monthly EGM gamblers that loaded up \$301 or more, 42% were classified as experiencing problem gambling. This compares to 4% among EGM gamblers that had a largest load up of \$100 or less.

53% of EGM gamblers with a largest load-up of \$300 or more indicated that they had experienced significant negative effects from this event.

#### Electronic Gambling Machine (EGM) user losses and self-reported expenditure

The introduction of note acceptors on EGMs in community venues in 2013/14 led to a 48% increase in real EGM user losses from 2014 to 2017.

In 2015 the amount of EGM user losses in community venues surpassed user losses in casino EGMs for the first time in the NT. In 2017, total EGM user losses in hotels and clubs was \$96.2 million. In the casino it was \$73.5 million.

Hotels and clubs with the maximum allowable number of EGMs prior to the lift in cap were the fastest to

install note acceptors. They were also the fastest to install additional EGMs.

The top 10 hotels in terms of user losses had a 112% increase in user losses after note acceptor installation (2013-2017). This compares to a 60% increase across all hotels.

The top 10 clubs in terms of user losses experienced a 30% increase in real user losses after the installation of note acceptors. This compares to a 26% increase across all clubs.

Weekly EGM gamblers made up 10% of all EGM gamblers but accounted for 69% of self-reported EGM expenditure. They had an annual self-reported expenditure of \$12,361, compared with \$2,180 for monthly and \$248 for less than monthly EGM gamblers.

EGM gamblers experiencing problem gambling made up 6% of EGM gamblers. However, they accounted for 38% of self-reported EGM expenditure.

The 31% of monthly or more EGM gamblers who indicated they had increased their spending after the installation of note acceptors, accounted for 49% of self-reported EGM expenditure. They had a self-reported annual spend of \$9,469.

#### Conclusions

Patterns of gambling in the NT are changing. Fewer people are gambling, but there are increases in the number of people experiencing problem gambling. A significant number of people are being harmed by someone else's gambling.

Over 50% of weekly EGM gamblers are classified as experiencing problem gambling or moderate risk of problem gambling. In over 70% of those harmed by someone else's gambling, EGMs were identified as the gambling activity.

Online gambling was also significantly associated with more problem gambling and harm from gambling.

The findings also show that the Aboriginal population in the NT experience a much greater burden of harm from gambling, compared with the non-Indigenous population. Innovative policy solutions are needed to reduce the harms associated with gambling in this more vulnerable population and across the NT.

[Click here to access the full report](#)

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**AGENDA ITEM 8:**  
Other Business



## Responsible Gaming Committee Memorandum

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**To:** Responsible Gaming Committee  
**From:** Mary Manos  
**Date:** 5 February 2021  
**Subject:** **Review of Committee Charter**

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Dear Committee Members

Article 5 of the Committee's Charter requires that the Charter be reviewed on an annual basis.

A formal review of the Charter has been conducted with a small number of non-substantive changes recommended.

A copy of the updated Committee Charter is attached.

### **Proposed Resolution**

Having reviewed the Charter, it was **RESOLVED** that the Committee recommend the attached updated Charter for approval by the Board.

Kind Regards

Mary Manos  
**General Counsel & Company Secretary**

8.1



# Crown Resorts Limited Responsible Gaming Committee Charter

Crown Resorts Limited ACN 125 709 953  
A public company limited by shares

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## 1. Introduction and background

The role of the Committee is to monitor and review responsible gaming programs and policies at each of Crown Resorts Limited's (the **Company**) wholly owned businesses.

## 2. Composition of the Committee

### 2.1. Structure

The Committee will be comprised of a minimum of two directors to be nominated by the Board.

The Chairperson of the Committee will be nominated by the Board. If the Chairperson of the Committee is not present at a Committee meeting, the members present must elect one of themselves to Chair the meeting.

Unless otherwise nominated by the Board, the Company Secretary will act as secretary of the Committee.

The appointment of a Committee member will cease if that person ceases to be a director of the Company or as otherwise determined by the Board.

### 2.2. Compensation

The Chairperson and individual members of the Committee may be entitled to fees additional to the directors' fees to which they are entitled, as may be determined from time to time by the Board.

### 2.3. Expertise

Members will have the skills and experience required to enable them to fulfill their duties and responsibilities as members of the Committee.

## 3. Duties, responsibilities and powers

### 3.1. Responsible gaming programs and policies

The Committee will:

- (a) monitor and review the operation and effectiveness of responsible gaming programs at each of the Company's wholly owned businesses;
- (b) recommend policies and procedures and consider recommendations from management or external advisers which may enhance the effectiveness of responsible gaming programs at each of the Company's wholly owned businesses;
- (c) promote and support continuous improvement in the responsible gaming performance of the Company's wholly owned businesses; and
- (d) encourage and promote awareness of responsible gaming and related welfare issues at the Company and its wholly owned businesses.

### 3.2. Engage external consultants

The Committee has the full authority of the Board to:

- (a) communicate and consult with external and internal stakeholders concerning the Company's responsible gaming ~~practices~~matters; and
- (b) appoint independent experts to provide advice on responsible gaming issues~~matters~~.

### 3.3. Board Reporting

- (a) The Committee will update the Board at each meeting of the Board that follows a Committee meeting and make relevant recommendations in relation to matters arising for consideration by the Committee;
- (b) report to the Company's wholly owned subsidiary boards from time to time as considered appropriate by the Committee or as otherwise requested by the relevant subsidiary board; and
- (c) make a copy of the minutes of proceedings of meetings of the Committee (and resolutions passed by members of the Committee without a meeting) available to the Company's subsidiaries, for distribution to their relevant boards.

## 4. Proceedings

### 4.1. Meeting frequency

The Committee will meet prior to each full regularly scheduled meeting of the Board.

### 4.2. Committee papers

Relevant documents to be considered at Committee meetings will be compiled and distributed by the Company Secretary to all Committee members as well as to any invitees to relevant Committee meetings.

### 4.3. Attendance at Committee meetings

The Committee may extend an invitation, which may be a standing invitation, to any person to attend all or part of a scheduled Committee meeting. Only Committee members shall be eligible to vote.

### 4.4. Quorum

A quorum for a meeting of the Committee is two members.

### 4.5. Minutes

Minutes of proceedings and resolutions of meetings of the Committee and resolutions passed by members of the Committee without a meeting, are to be approved by the Committee (or in the case of written resolutions, tabled) at its next meeting.

Minutes of a meeting must be signed by the chair of the meeting within a reasonable time after the meeting at which the minutes are approved.



A resolution may be made if a document containing the relevant resolution is assented to by all Committee members eligible and willing to participate in the making of the resolution.

The resolution will be taken to have been passed when the document is last assented to by a Committee member. Where a Committee member has assented by means other than writing, that Committee member must sign the document containing the relevant resolution within a reasonable time after having provided their assent.

## 5. Amendment and review

The Committee must review this Charter on an annual basis to ensure it remains consistent with its objectives, the Constitution and existing regulatory requirements and recommendations. Any proposed changes must be referred to the Crown Board for approval.

**Crown Resorts Limited**

February ~~2020~~2021



## Responsible Gaming Committee Memorandum

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**To:** Responsible Gaming Committee  
**From:** Mary Manos  
**Date:** 5 February 2021  
**Subject:** **Future Meetings**

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Dear Committee Members

The Committee meetings for 2021 are scheduled as follows:

Meeting Date	Time (Melb time)
Wednesday, 24 March	10.00am
Wednesday, 2 June	11.00am
Tuesday, 10 August	11.00am
Wednesday, 6 October	10.00am
Wednesday, 1 December	11.00am

Kind Regards

Mary Manos  
**General Counsel & Company Secretary**

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