

SUBJECT: Responsible Gaming Department Policy and Procedures

POLICY TITLE: Crown Melbourne Self Exclusion Program

APPROVED BY: Sonja Bauer REVIEWED: October 2019
VERSION: 3.0 ISSUE DATE: April 2014

1. Policy Statement

Crown Melbourne Limited (**Crown**) operates a Self Exclusion Program (**SEP**) in accordance with the relevant documents listed below and the policies and procedures outlined in this document. The Responsible Gaming Advisors (RGAs) will facilitate Crown's SEP and be authorised to issue Exclusion Orders by Power of Attorney executed by Crown through its attorney. Information gathered during the facilitation will not be disclosed to a third party unless legally obliged or with the self excluded person's consent.

When persons apply for Self Exclusion they will be issued an *Exclusion Order* pursuant to their *Application to Self Exclude from Crown* (the Application). This will be referred to as the Self Exclusion Order.

Definition of Self Exclusion

Self Exclusion at Crown is a program, enacted by law and administered by Crown, where a person voluntarily applies to ban themselves from the casino gaming floor.

Definition of casino

Casino refers to the gaming floor which is a defined, Victorian Commission for Gambling and Liquor Regulation (VCGLR) approved boundary. For the purposes of this document and for clarity for the customer/person, the term 'casino gaming floor' will be used and take on the definition of casino.

1.1 The Self Exclusion interview and supporting documents

The person applying for Self Exclusion (the **applicant**) will be interviewed by the RGA. The interview will be conducted according to the protocols and guidelines set out in this policy document.

Upon completion of the self exclusion process, the RGAs will provide the self excluded person with information about various problem gambling support services and welfare organisations. They will also be given the copy of the *Application for Self Exclusion from Crown* and the original of the *Exclusion Order*.

1.2 Self Exclusion information provision

RGAs and other Responsible Gaming Department employees will provide the relevant details and information to a person making an enquiry about Crown's Self-Exclusion program.

1.3 Administrative compliance for the SEP and notifying the VCGLR

In accordance with relevant documents listed below, the RGAs will apply the appropriate Stop Codes to a person's Crown Rewards account at the time of Self Exclusion, to facilitate the cessation of advertising and promotional material being sent to self excluded persons.

All documents associated with the Self Exclusion process will be sent to the VCGLR.

Scope

RGAs and any other Responsible Gaming Department employees involved in the process of Self Exclusion, including related compliance functions and providing customers with information, and those who hold Power of Attorney may be called on to assist with the facilitation of Crown's Self Exclusion program.

Procedures

- Responding to requests from customers to apply for the Self Exclusion program
 - **1.1** If the customer is not at the Responsible Gaming Centre (**RGC**), attend location, meet the customer and relocate to RGC.
 - 1.2 Determine if the customer is affected by medication, drugs or alcohol. RGA will determine if the customer is capable of making an informed decision. If the customer is unable to do so, RGA is to request the customer return at a later date.
 - 1.3 If the customer's English comprehension is limited, offer the assistance of an interpreter. Where an interpreter is required, source from staff pool first.
 - **1.4** Provide the following Self Exclusion pre-interview information about the process:
 - Self Exclusion is voluntary
 - There is an interview and they will need to allow time for this
 - Photo identification (ID) is required if the customer does not have photo ID, conduct an electronic search for scanned ID and attach this to customer's other, non-photo, ID.
 - RGA will explain that membership will be cancelled and all points deleted.
 - If in doubt, contact the Responsible Gaming Manager for direction
 - **1.5** Provide the following Self Exclusion pre-interview information about the Self-Exclusion Order:
 - It is legally binding, effective immediately, and the period of exclusion is indefinite
 - It prohibits access to the casino gaming floor and it is the responsibility of the individual to comply
 - Entering or remaining on the casino gaming floor may result in a government issued fine and/or withholding of any winnings

- All Crown Rewards points are removed at the time of Self-Exclusion
- A photo will be taken and provided to Crown's Surveillance
 Department
- Crown is required by law to notify the VCGLR of all Self Exclusions
- **1.6** If the customer does not wish to proceed:
 - Provide the RGC and Self Exclusion brochures and external support service information as required
 - RGA will advise the customer of all RGC services
- **1.7** If the customer chooses to apply:
 - Prepare for, and proceed with, the Self Exclusion interview

2. What to prepare before the interview and photographing the applicant

- **2.1** Obtain appropriate identification from the applicant and make a photocopy of this on the *Identification Presented at Self Exclusion* form
- 2.2 If the applicant's details are not current, ask the applicant to complete and sign the relevant section of the *Identification Presented at Self* Exclusion form
- 2.3 Ascertain, using the identification provided, if the applicant is subject to a current (Self)-Exclusion Order or any Crown sanctions and progress accordingly
- **2.4** Take two photos of the applicant and proceed with the interview

3. Interviewing the applicant

- **3.1** Conduct the Self Exclusion interview, ideally, with only the applicant present to encourage open and honest responses to questions
- **3.2** Allow the applicant to have a support person present, including a counsellor, only if they are comfortable and it is their preference

- 3.3 Do not allow a second person in the interview room if there is any indication that the presence of that person may cause the applicant duress
- **3.4** Explain, prior to commencement of questioning, that you will be recording, in writing, answers to the interview questions
- 3.5 Explain any absence from the interview room to the applicant
- 3.6 Write all the applicant's responses verbatim
- 3.7 Do not embellish or alter any statement made by the applicant

4. Arranging a witness and completing the Self Exclusion documents

- **4.1** All Crown employees with a Casino Special Employee Licence can witness the *Exclusion Order and Application for Self Exclusion from Crown Casino*
- **4.2** Ensure the witness completes the *Self Exclusion Witness Statement* verifying the applicant's identification
- **4.3** Print the Application for Self Exclusion from Crown Casino and the Exclusion Order on Crown letterhead
- **4.4** Check the documents for accuracy of following details:
 - correct spelling of names
 - correct spelling and details of the applicant's address
 - accurate date and time on the Exclusion Order at the point of issue
- **4.5** Ask the applicant to sign the *Application for Self Exclusion from Crown Casino* and prior to it being witnessed
- **4.6** Ensure the witness sights the applicants' identification before signing the *Application for Self Exclusion from Crown Casino*
- **4.7** Sign, and have witnessed, the *Exclusion Order*

Providing the relevant documents and support information to the self-excluded person

5.1 The RGA will make a copy of the document:

- Provide a copy of the Application for Self Exclusion from Crown Casino
- Provide the original Exclusion Order to the applicant
- **5.2** Provide the self-excluded person with the following information:
 - RGC business card and brochures, incorporating Gambler's Help details
 - Any other relevant welfare/community support service details
- **5.3** Remind the person of the ongoing availability of the RGC and RGAs
- **5.4** Set up an appointment with the Responsible Gaming Psychologist (**RGP**) or Chaplain if requested

6. Completing Self-Exclusion paperwork to ensure compliance

- **6.1** Search for any secondary accounts the applicant may have in LUI.
- **6.2** Remove the assigned host from the applicant's account/s.
- 6.3 Place Stop Codes to the primary account and all secondary accounts of the applicant. In the case of all program players, please advise Mahogany hosts to finalise all accounts before placing stop codes.
- 6.4 Add the subject to the Self Excluded watch list in NEOFACE. Refer to NEOFACE SOP doc.
- **6.5** Prepare the Self-Exclusion Photofile with the photograph and relevant information
- **6.6** Type the interview statement and save in the Responsible Gaming database
- **6.7** Provide the following paperwork to the Responsible Gaming Office Coordinator who will scan and forward to the VCGLR:
 - the original Application for Self-Exclusion from Crown Casino
 - a copy of the Exclusion Order
 - typed interview statement
 - Self-Exclusion photofile
 - · Scanned identification of applicant

- **6.8** Have the interview statement witnessed by an authorised person as soon as practicable
- 6.9 Provide the witnessed statement to the Responsible Gaming Office Coordinator who will record this and forward these to the VCGLR

7. Responding to enquiries about the Crown Self Exclusion program

- **7.1** Ascertain the personal details, if possible, of the enquirer
 - Name
 - DOB
 - Address
- **7.2** Do not prescribe Self-Exclusion. The individual must make this determination.
- **7.3** Provide the following information about the process:
 - Self-Exclusion is voluntary
 - No appointment is necessary RGAs available 24 hours, 7 days a week
 - There is an interview process and they need to set aside some time for this
 - Approved identification is required and a photo will be taken
- 7.3 Provide the following information about the Self Exclusion Order:
 - It is legally binding, effective immediately and the period of exclusion is indefinite
 - It prohibits access to the casino gaming floor and it is the responsibility of the individual to comply
 - Entering or remaining on the casino gaming floor may result in a government issued fine and/or withholding of any winnings
 - All Crown Rewards points and benefits are removed at the time of Self-Exclusion
- 7.4 Advise that support is always available through the RGC, including for the duration of exclusion
- **7.5** Provide the following information upon request:

- Crown has a revocation process, considered after a 12 month breach free period
- Applicants receive a copy of their Application for Self-Exclusion from Crown Casino and the Exclusion Order
- Crown is required by law to notify the VCGLR of all Self-Exclusions
- the right to appeal the Self Exclusion Order, via the VCGLR, within 28 days from the date of application and issue

8. Self Exclusion from Crown Perth

- **8.1** If a customer wishes to self exclude from Crown Perth, present the applicant with a Crown Perth Self Exclusion Application form.
- **8.2** Ensure the customer initials the boxes next to each paragraph to indicate they have read and understood all terms, conditions and relevant information.
- **8.3** Type the applicant's name, address and DOB on the first page along with the date. Applicant and witness names on the second page. RGA to witness the *Application*.
- 8.4 Make a copy of the Crown Perth Self-Exclusion Application form and hand the copy to the applicant along with a 'Gambling Help WA' and 'Gambling Help Financial' brochure from Centrecare Gambling Help (WA).
- **8.5** Email the ID of the person self-excluding to Crown Perth at rsg@crownperth.com.au as soon as the paperwork is completed.
- **8.6** The original Crown Perth Self-Exclusion Application form is to be passed on to the Responsible Gaming Office Coordinator.

9. Responsible Gaming Office Coordinator to process Perth Application

- 9.1 Provide the following documents (in this order) to Crown Perth by sending it to rsg@crownperth.com.au
 - Self-Exclusion Photofile
 - Crown Perth Application for Self-Exclusion

- Self-Exclusion Identification Provided
- Self-Exclusion Witness Statement
- Self-Exclusion Interview Statement
- Self-Exclusion Typed Statement
- 9.2 Once the typed statement has been witnessed, this will need to be forwarded to Crown Perth by sending it to rsg@crownperth.com.au as a single document.

Recording information

Interaction is to be documented in SEER as per the guidelines. Details of the incident will be recorded in a register held at the Responsible Gaming Centre in accordance with the Responsible Gambling Code of Conduct.

Use of customer information

Employees in the Responsible Gaming Department will use customer information only to facilitate ongoing support for that customer or for a purpose otherwise outlined in policies regarding disclosure.

Relevant Documents

- National Privacy Principles of the Privacy Act 1988 (Cth)
- Crown Melbourne Limited Privacy Policy
- Crown Employee Code of Conduct
- Responsible Gambling Code of Conduct