



**SUBJECT:** Responsible Gaming Department Policy and Procedures  
**POLICY TITLE:** Breach of the Self Exclusion Order  
**APPROVED BY:** Luke Overman      **REVIEWED:** January 2021  
**VERSION:** 1.5      **ISSUE DATE:** September 2013

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## 1. Policy Statement

Responsible Gaming Advisors (RGAs) will liaise and coordinate with the Surveillance Communications Centre, and the Surveillance Department where a breach of a Self-Exclusion Order has occurred. This will be resolved in accordance with the relevant documents listed in this policy document.

The RGA will further attempt to engage the self-excluded person and offer support after they have been removed from the casino gaming floor.

The Responsible Gaming Department may impose sanctions for recidivist behaviour of persons subject to a Self-Exclusion Order.

### **Definition of a breach of a Self- Exclusion Order**

A breach of a Self- Exclusion Order occurs when a self-excluded person enters the casino gaming floor and/or remains there.

### **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 Notifications to relevant Crown employees and the VCGLR after a breach has been detected**

After detection occurs, the RGA, VCGLR, Surveillance operator, and the Security Services Department must be notified. The order in which this occurs depends on how the detection was made and by whom.

The Surveillance Department has the responsibility of notifying the VCGLR and Surveillance Communications Centre and, where a Surveillance operator also makes the detection, they will inform the RGA.

Where a gaming department employee makes the detection they will follow their departmental procedures of escalation. The RGA may be notified directly or by the Surveillance Department.

Where a third-party, such as a gaming department/other employee, or non-Crown party, notifies the RGA of a breach, the RGA will notify the Surveillance Department and, where practicable, the relevant gaming manager.

### **1.2 Identification of the Self-Excluded person**

The RGA will make the initial approach to the self-excluded person. This will be done with Security present when possible and with coverage by Surveillance.

### **1.3 Withholding of winnings**

Crown employees have the responsibility to initiate withholding the winnings of a person subject to a Self- Exclusion Order. The RGA, where practicable, will notify the relevant gaming manager of the opportunity to withhold winnings. The relevant gaming manager will generally initiate withholding of winnings and will coordinate any subsequent action regarding this. The RGA will notate any winnings withheld.

#### **1.4 Removal of the Self-Excluded person**

The RGA and or Security will remove the self-excluded person. Update the relevant databases.

#### **1.5 Support of the Self-Excluded person**

The RGA will attempt to engage the person, remind them of their obligations, and offer the services of the Responsible Gaming Centre (RGC) and external service providers.

### **Scope**

Responsible Gaming Department employees, who are involved in the detection and coordinated response to a breach of a Self-Exclusion Order, and who attend the location of the breach and engage the self-excluded person.

### **Procedures**

#### **1. Detection of Self-Excluded persons on the casino gaming floor by the RGA**

- 1.1 Notify the Surveillance Department of the suspected breach
- 1.2 If practicable, ascertain if the self-excluded person has an *Exclusion Order* pending and, if so, follow Procedure (3) of this policy document
- 1.3 Wait for Security to attend before making the initial approach and cause the removal of the person

**1.4** If practicable, notify the relevant gaming department manager of the opportunity to withhold winnings and provide the self-excluded person's details

**1.5** Upon removal from the gaming floor the RGA:

- will offer RGC and external service providers' assistance to the person
- remind the person of their obligations to the Self- Exclusion Order
- provide the person with RGC business card, incorporating Gambler's Help contact details

**1.6** Ascertain if sanction guidelines (see 1.6.1) have been met and, if so, send a recommendation to the Responsible Gaming Manager, for Crown to generate an Alert Notice or issue an *Exclusion Order* on the basis the person has contravened the conditions of their Self- Exclusion Order

**1.6.1 Sanction Guidelines**

- Information received from third party about alleged breaches and self- disclosure of breaches or seeking further assistance escalate to an Alert Notice
- Frequent multiple breaches escalates to an Exclusion Order

**2. Detection of Self-Excluded persons on the casino gaming floor by the Surveillance Department**

**2.1** The RGA will attend the location advised by the Surveillance Operator

**2.2** The RGA will follow Procedure (1) of this policy document, from step (1.2)

**2.3** If unable to attend, the RGA will advise the Surveillance Operator to request Security remove the self-excluded person

### **3. Notification by a third party of Self-Excluded persons on the casino gaming floor (alleged breach) to a RGA.**

- 3.1 Maintain confidentiality of self-excluded person's information when speaking to the third party
- 3.2 Do not disclose a person's self-excluded status nor knowledge of their attendance or non-attendance at Crown to the third party
- 3.3 Attempt to ascertain the following details of the alleged self-excluded person:
  - name
  - DOB
  - address of the self-excluded person
  - description of clothing
  - any knowledge of where the person may be located on the casino gaming floor
  - any knowledge of gambling/game preference
  - any knowledge of behavioural patterns with regard to when the self-excluded person may attempt to enter the casino gaming floor
- 3.4 Thank the caller/third party and reassure them of our proactivity

### **4. Serving Crown Exclusion Orders to persons who contravene the conditions of their Self-Exclusion Order**

- 4.1 The RGA will ensure accuracy of the following *Exclusion Order* details before serving:
  - personal information of the self-excluded person
  - currency of the '*Period of Exclusion*' expiry date
  - the wording for grounds for the *Exclusion Order* reads: 'breaching your Self-Exclusion Order'

- 4.2 Read the *Exclusion Order Statement* verbatim to the Self-Excluded person
- 4.3 Have the *Exclusion Order Statement of Service* witnessed by authorised personnel and signed as soon as practicable
- 4.4 Forward the *Exclusion Order Statement of Service* to the Security Investigations Unit where it will be passed to the VCGLR

### **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 Limited Privacy Policy
- Crown Employee Code of Conduct
- Responsible Gambling Code of Conduct