



Victorian Commission for
Gambling and Liquor Regulation

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Our ref: CD/20/10789

Mr Joshua Preston
Chief Legal Officer
Crown Resorts Limited
8 Whiteman Street
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Dear Mr Preston

Sixth Casino Review Recommendations 7, 8 and 9

I refer to Crown Melbourne Limited's (Crown's) submission to the Victorian Commission for Gambling and Liquor Regulation (the Commission) dated 30 December 2019 in relation to the implementation of recommendations 7 and 8.

At its meeting on 30 July 2020, based on the submission provided by Crown, the Commission noted that:

- in relation to recommendation 7, Crown uses observable signs in conjunction with other harm minimisation measures such as player data analytics to identify customers at risk of being harmed from gambling
- in relation to part (a) of recommendation 8, Crown had in operation a comprehensive real-time player data analytics tool by 1 January 2020
- in relation to the second limb of part (b) of recommendation 8, Crown has reported in detail its comprehensive study (including legal, technical and methodological issues) of all the practical options for a real-time player data analytics tool for un-carded play by 1 January 2020.

In noting implementation of recommendation part (a) of recommendation 8, the Commission noted some remaining questions and potential issues around the effectiveness and timeliness of Crown's player data analytics tools, but considered these matters more relevant to recommendation 9 of the Sixth Casino Review report (the Review) which provides:

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.

The Commission has determined that if recommendation 9 is to provide effective guidance on the suitability of Crown's approach to implementing player data analytics tools, the scope of the independent assessment to be undertaken in accordance with recommendation 9 must cover both data analytics tools developed by Crown ('Play Periods monitoring' and the 'Crown Model').

In addition, the scope of the independent assessment must address all questions and potential issues raised in respect of the suitability of the approach during the VCGLR's

