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Mr Jason Cremona  
Manager, Licence Management & Audit  
Victorian Commission for Gambling and Liquor Regulation  
Level 3, 12 Shelley Street  
RICHMOND VIC 3121

**By Email**

Dear Mr Cremona

**Sixth Review of the Casino Operator and Licence (Sixth Review) - Recommendation 9**

We refer to previous discussions regarding Recommendation 9 of the Victorian Commission for Gambling and Liquor Regulation's (VCGLR) Sixth Review of the Casino Operator and Licence. Recommendation 9 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.*

Crown Melbourne (**Crown**) confirmed the implementation of the Crown Model in correspondence to the VCGLR dated 30 December 2019, 'Sixth Review of the Casino Operator and Licence (Sixth Review) – Recommendations 7 and 8'.

As a result of the COVID-19 pandemic and subsequent Federal and State government directives, Crown ceased gaming operations from 23 March 2020, and since that time the gaming floor has remained closed. The Recommendation anticipated 12 months of data to be reviewed, however, it follows that the gaming data that could be used to effect the requirements of Recommendation 9 is limited to the early months of 2020, just short of three months' of data.

Accordingly, Crown respectfully requests that the VCGLR consider an extension for completion of the Recommendation, to ensure that a useful set of data is available for analysis. Crown proposes that the new starting point for data collection is a minimum of three months post the opening of Crown's Main Gaming Floor. The three month period is 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.

In anticipation of Recommendation 9 progressing, Crown had made contact with two respected consultants who it considers suitable to conduct the Recommendation 9 assessment. Both consultants have confirmed their availability to undertake the assessment. Information about these persons is provided at Appendix A for your information and in anticipation of discussions regarding suitable candidates.

We appreciate your consideration of these matters. Please do not hesitate to contact me if you have any queries or would like to meet to discuss the matters raised in this letter.

Yours sincerely



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

Encl.

## Appendix A

### Dr Jonathan Parke

#### Director, Sophro, United Kingdom

Dr Parke is Director of Sophro, a consultancy that specialises in research and policy relating to gambling. He has a PhD in gambling studies and extensive experience working across the UK and Europe. Dr Parke has collaborated on international projects on topics such as gaming machines, internet gambling, consumer needs in gambling and responsible gambling.

In his previous role as Director of Commissioning for the Responsible Gambling Trust in Great Britain, Dr. Parke was responsible for an annual budget of £5.5 million to deliver research, education and treatment aimed at addressing disordered gambling. Over the past two decades, he has developed, delivered and managed university level courses and corporate training programs in gambling studies.

Dr Parke has secured funding from a wide variety of sources including government, research councils and industry in order to carry out independent research into gambling behaviour. Sponsors have included the Economic and Social Research Council, the Technology Strategy Board, the Gambling Commission for Great Britain, the Home Office, the British Academy and some of the world's largest betting and gaming companies.

At present, Dr Parke is exploring harm minimisation in gambling, qualitative methods in understanding real world quantitative data and consumer motivation in gambling.

Dr Parke was formerly a lecturer at Nottingham Trent University (UK) and the University of Salford (UK).

### Dr Robert Heirene

Dr Robert Heirene is a Postdoctoral Research Associate at the Gambling Treatment & Research Clinic, based within the Brain & Mind Centre at the University of Sydney.

Experienced in statistical and data analysis, his research focuses on a variety of topics within the field of addiction, including:

- [1] reducing gambling-related harm;
- [2] the assessment and treatment of alcohol-related cognitive impairment;
- [3] exploring the parallels between the experiences of extreme sports athletes and those with substance and behavioural addictions; and
- [4] the transparency and methodological rigour of addiction research.

He is currently involved in a research project that aims to identify the most effective methods of encouraging the use of consumer protection tools in online wagering and evaluating their efficacy in reducing gambling-related harms.