

SUBJECT:	Corporate Policy Statement			
POLICY TITLE:	Unacceptable Behaviour			
APPROVED BY:	Craig Walsh	REVIEWED :	<u>##_MayNovember</u>	
VERSION:	Version 10.1	ISSUE DATE:	2019 July 2005	

1. Statement of Purpose

1.1 The aim of this Policy is to provide an understanding of what constitutes unacceptable behaviour and what action may be taken.

2. Policy Statement

- 2.1 The term "unacceptable behaviour" includes but is not limited to:
 - 2.1.1 Theft;
 - 2.1.2 Assault;
 - 2.1.3 Begging/Scrounging;
 - 2.1.4 Employee Abuse or Harassment;
 - 2.1.5 Loyalty Program Abuse;
 - 2.1.6 Syndicate Play/Associated Activities;
 - 2.1.7 Card Counting/Breach of Restrictions;
 - 2.1.8 Recidivist Breach of Exclusion/Self Exclusion Order;
 - 2.1.9 Prostitution/Soliciting/Sexual Misconduct;
 - 2.1.10 Loan Sharking/Incidents Arising from Money Lending;
 - 2.1.11 Illicit Commerce Selling Goods;
 - 2.1.12 Urinating/Spitting/Other;
 - 2.1.13 Unattended Children;
 - 2.1.14 Recidivist Intoxication;
 - 2.1.15 Violent or Threatening Behaviour;
 - 2.1.16 Criminal Damage;
 - 2.1.17 Cheating at Gaming or use of Counterfeit: Chips, Vouchers or Money;
 - 2.1.18 Known or suspected Gang Membership (i.e. known or suspected of being involved in outlaw motorcycle gangs) including known or suspected association with such Gangs or Gang Members;

- 2.1.19 Known or suspected to currently have, or to have had involvement or association with any organised crime figures, members and/or groups;
- 2.1.20 The customer is known to be the subject of serious criminal charges;
- 2.1.21 Drug offences; and
- 2.1.22 Any other behaviour deemed by Crown Melbourne Limited (**Crown**) in its discretion to be unacceptable.

3. Procedure

- 3.1 Crown employees are encouraged to report incidents of unacceptable behaviour to their Manager or to a Security Services representative for appropriate action.
- 3.2 Depending on the nature and/or severity of the unacceptable behaviour a Manager or Security Services representative involved in the incident may:
 - 3.2.1 Ask the customer to modify his/her behaviour;
 - 3.2.2 Ask the customer to leave the premises;
 - 3.2.3 If necessary remove the person from the premises; or
 - 3.2.4 Detain the person pending the arrival of the police.
- 3.3 Where deemed necessary, the Security Services Manager (or above) may issue a Withdrawal of Licence. A Withdrawal of Licence is a common law right to refuse someone entry to property.
- 3.4 Follow-up action
 - 3.4.1 Where the immediate action taken does not adequately deal with the situation, further action may be required and could include:
 - (a) Reporting of the matter to the Security Investigation Unit (**SIU**) for further investigation; and
 - (b) Preparation of a file containing relevant information or evidence.
 - 3.4.2 Submission of the completed file, together with any recommendation from any relevant department for further action that may be <u>necessary appropriate</u>, including any <u>one or a combination of the following</u>:
 - (a) Advice to customer/s;
 - (b) Preparation of a Person of Interest (**POI**) file;
 - (c) A Letter of Warning;

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- (d) Withdrawal of Licence;
- (e) Exclusion Order¹ (where appropriate, including for significant unacceptable conduct or serious criminal conduct);
- (f) Referral to police; or
- (g) Formal legal action.
- 3.4.3 As a general rule Exclusion Orders are issued where the activity, behaviour or incident impacts on the integrity of the game (although there can be overlap with other unacceptable behaviours).
- 3.5 Assistance
 - 3.5.1 At the time of an incident the attending personnel should provide whatever assistance may be required to the victim or complainant and/or employee.
 - 3.5.2 Follow-up support will be offered to individuals (employees or customers) involved in an incident as deemed appropriate. Support may be in the form of medical assistance, counselling or referral to the Employee Assistance Program.
 - 3.5.3 Any customer complaint, or appeal from an Exclusion Order can be made to the Victorian Commission for Liquor and Gambling Regulation (**VCGLR**) and Crown will assist the customer in providing the contact details for the VCGLR.

¹ Exclusion Order means a written or oral order under section 72 of the Casino Control Act or a written order under section 74 of the Casino Control Act, prohibiting a person from entering or remaining in a casino or the casino complex.

4. Revision History

Issue Date	Version	Author Initials	Section changed	Change Details
19 May 2016	7.0	JC	No changes	No changes
10 May 2017	8.0	JC	2.1	Additional definitions
10 January 2018	9.0	JC	3.2	Addition of Manager
18 June 2018	10.0	CW	No changes	No changes
<u>****</u> 2018 <u>November</u> 2019	11.0	JC	<u>3.4.2</u>	General tidying and insert for Recommendation 19 of the 6 th s 25 Review

5. Certification

Responsibility	Name	Business Unit	Signature	Date
Prepared By	Jacqueline Couch	Regulatory and Compliance		
Approved By	Craig Walsh	Security		