

CROWN'S IMPLEMENTATION OF THE SIXTH REVIEW RECOMMENDATIONS

RECOMMENDATIONS WITH A FIXED COMPLETION DATE

Rec. no.	Recommendation	Required date of completion	Date on which Crown submitted it had completed the recommendation	Date on which VCGLR acknowledged completion	Notes
1	The VCGLR recommends that, by 1 January 2019, Crown develop, and submit to the VCGLR for approval, a change program to fully engage its independent directors in proactive strategic oversight of the operations of the Melbourne Casino.	1 January 2019	24 December 2018 Letter (CRW.510.029.0997) attaching memorandum (CRW.510.029.0999)	March 2019 CRW.510.029.1021	The VCGLR sought clarification of certain matters and further information between 3 January 2019 and 11 January 2019 (CRW.510.029.1527). Some further correspondence occurred in relation to, inter alia, recommendation 1 in August 2020 (CRW.510.029.1856).
2	The VCGLR recommends that, by 1 January 2019, Crown undertake a review of the required qualifications for committee chairs set out in the charters and ensure that the appointees' actual qualifications match.	1 January 2019	24 December 2018 Letter (CRW.510.029.1585)	March 2019 CRW.510.029.1021	In its letter of March 2019, the VCGLR asked that Crown perform, for Crown Resorts, the same qualification-review exercise as had been carried out for Crown Melbourne (CRW.510.029.1021). Crown undertook that review (CRW.510.029.1591; CRW.510.029.1621) to the satisfaction of the VCGLR (CRW.510.029.5545).
3	The VCGLR recommends that, by 1 July 2019, Crown assess the robustness and effectiveness of its	1 July 2019	1 July 2019	9 January 2020 CRW.510.029.1855	The VCGLR deferred its decision on whether Crown had implemented recommendation 3 pending an

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	risk framework and systems, including reporting lines in the chain of command, and upgrade them where required. This assessment should be assisted by external advice.		Letter (CRW.510.029.1767) and appendices (CRW.510.029.1976; CRW.510.029.1978; CRW.510.029.1979; CRW.510.029.1985)		<p>opportunity to consider a report by Deloitte that informed Crown's implementation of recommendation 3 (CRW.510.029.1861). The report was provided to the VCGLR by Crown (CRW.510.029.1745). The VCGLR sought additional information from Crown, and that information was provided (CRW.510.029.1940; CRW.510.029.1761; CRW.510.029.1763). Mr Harris of the VCGLR thanked Crown for the additional information, said that it was "very helpful", and directed some further queries at Crown (CRW.510.029.2093). Crown responded to those queries (CRW.510.029.1934).</p> <p>Some further correspondence occurred in relation to, inter alia, recommendation 3 in August 2020 (CRW.510.029.1856).</p>
4	The VCGLR recommends that, by 1 July 2019, Crown undertake a robust review of internal controls to ensure that Crown's regulatory and compliance department is	1 July 2019	1 July 2019 Letter (CRW.510.029.2332) and appendices (CRW.510.029.2335;	3 September 2019 CRW.510.029.1861	

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	aware of all projects and works in progress for which regulatory approvals might be relevant.		CRW.510.029.2341; CRW.510.029.2398)		
6	The VCGLR recommends that, by 1 January 2020, Crown Melbourne review its allocation of staffing resources to increase the number of work hours actually available to responsible gambling and intervention with patrons.	1 January 2020	23 December 2019 Letter (CRW.510.029.2969)	5 May 2020 CRW.510.029.2748	Ms Fielding and Ms Bauer answered various queries from the VCGLR in response to which Mr Harris of the VCGLR said: "Thank you for your responses. Very helpful indeed." (CRW.510.029.2798; CRW.510.029.2810; CRW.510.029.2811).
8(a)	The VCGLR recommends that Crown Melbourne proceed with development and implementation of comprehensive data analytics tools for all patrons, to proactively identify for intervention patrons at risk of harm from gambling. ... In particular: (a) for carded play (that is, player activity which can be systematically tracked), Crown Melbourne will have in operation a comprehensive real-time player data analytics tool by 1 January	1 January 2020	30 December 2019 Letter (CRW.510.029.3248) with appendices (CRW.510.029.3258; CRW.510.029.3260; CRW.510.029.3282)	19 August 2020 CRW.709.036.9111	The VCGLR had certain queries in June 2020 to which Crown responded (CRW.510.029.3147). In its letter of 19 August 2020 (CRW.709.036.9111), the VCGLR requested that Crown provide a report prepared by Professor Blaszczyński. Crown provided a redacted version of the report on 2 September 2020 (CRW.510.029.3601; CRW.510.029.3603). On 15 October 2020, the VCGLR queried the redactions. On 29 October 2020, Crown provided an unredacted copy of the report (CRW.510.029.3177; CRW.510.029.4158).

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	2020, and monitoring of play periods.				
8(b) – limb 1	... (b) for un-carded play (that is, all other player activity), Crown Melbourne will, by 1 January 2019, commence a comprehensive study of all the practical options for a real time player data analytics tool ...	1 January 2019	24 December 2018 Letter (CRW.510.029.3170)	March 2019 CRW.510.029.1021	
8(b) – limb 2	... with a view to reporting in detail (including legal, technical and methodological issues) to the VCGLR by 1 January 2020 ...	1 January 2020	30 December 2019 Letter (CRW.510.029.3248) with appendices (CRW.510.029.3258; CRW.510.029.3260; CRW.510.029.3282)	19 August 2020 CRW.709.036.9111	
8(b) – limb 3	.. and the tool being in operation by 1 July 2022.	1 January 2022	Falls due next year.	N/A	
9	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) above),	Originally 1 January 2021, but extended to 15 months from the date that gaming recommences after COVID-19	Falls due next year. Because recommendation 9 contemplated the collection of 12 months of carded play data, and	N/A	

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	to be completed 12 months after implementation of the tool.	shutdowns. Gaming recommenced late November 2020 – thus, recommendation 9 now does not fall due until early 2022.	such data could not be obtained owing to COVID-19 shutdowns (see CRW.510.029.4186), the VCGLR, on 29 October 2020, granted a 15-month extension from the date that gaming resumes (CRW.510.029.4207).		
10	The VCGLR recommends that, by 1 July 2019, Crown Melbourne undertake a comprehensive review of its policy for the making and revocation of voluntary exclusion orders under section 72(2A) of the <i>Casino Control Act</i> .	1 July 2019	28 June 2019 Letter (CRW.507.001.6111)	13 November 2019 CRW.510.029.4623	In September 2019, the VCGLR sent some queries in relation to, inter alia, recommendation 10 (CRW.510.029.4907). Crown responded to these by letter on 26 September 2019 (CRW.510.029.4343).
11	The VCGLR recommends that, by 1 July 2019, Crown Melbourne develop and implement a policy and procedure to facilitate Crown Melbourne issuing involuntary exclusion orders under section 72(1) of the <i>Casino Control Act</i> at the request of family members and friends in appropriate cases.	1 July 2019	28 June 2019 Letter (CRW.507.001.6563)	13 November 2019 CRW.510.029.4623	In September 2019, the VCGLR sent some queries in relation to, inter alia, recommendation 11 (CRW.510.029.4907). Crown responded to these by letter on 26 September 2019 (CRW.510.029.4343).

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12	The VCGLR recommends that, by 1 July 2019, Crown Melbourne expand facial recognition technology to cameras on all entrances to the casino and that Crown Melbourne provide written updates on a quarterly basis on its effectiveness to the VCGLR.	1 July 2019	28 May 2019 Letter (CRW.510.029.5495)	6 August 2019 CRW.510.029.5545	In addition to requiring Crown to expand facial-recognition technology, recommendation 12 required and continues to require Crown to provide quarterly updates on the effectiveness of that technology thereafter. Crown has been doing this: CRW.510.029.5668; CRW.510.029.5676; CRW.510.029.5679; CRW.510.029.5686; CRW.510.029.5693; CRW.510.029.5700. Crown answered certain queries about a particular tranche of data in November 2019 (CRW.510.029.5967).
13	The VCGLR recommends that, as part of developing a new responsible gambling strategy, by 1 July 2019, Crown Melbourne rebrand or refresh its responsible gambling messaging and publish new responsible gambling messages throughout the casino, in all Crown Melbourne publications, including online and social media platforms.	1 July 2019	29 June 2019 Letter (CRW.510.029.6092)	3 Sep 2019 CRW.510.029.1861	

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14	The VCGLR recommends that, by 1 July 2019, Crown Melbourne develop and implement a responsible gambling strategy focusing on the minimisation of gambling related harm to persons attending the casino.	1 July 2019	29 June 2019 Letter (CRW.510.029.6189) and appendix (CRW.510.029.6375)	13 November 2019 CRW.510.029.4623	In August 2019, Crown provided additional information in relation to recommendation 14 as requested by the VCGLR (CRW.510.029.6357).
15	The VCGLR recommends that, within three months of implementing the new responsible gambling strategy (recommendation 14), there is regular reporting to the Crown Resorts Responsible Gaming Committee for it to maintain oversight of Crown Melbourne's harm minimisation strategy for responsible gambling.	Within three months of the implementation of rec. 14 (i.e., 1 October 2019)	1 October 2019 Letter (CRW.510.029.6469)	9 January 2020 CRW.510.029.1855	Recommendation 15 required the regular reporting to commence within a particular timeframe. That occurred, and regular reporting has thereafter continued (CRW.510.029.6461; CRW.510.029.6463; CRW.510.029.6534; CRW.510.029.6536; CRW.510.029.6538; CRW.510.029.6542; CRW.510.029.6544; CRW.510.029.6546; CRW.510.029.6548; CRW.510.029.6550; CRW.510.029.6552; CRW.510.029.6491; CRW.510.029.6492; CRW.510.029.6494).
16	The VCGLR recommends that within three months of	Within three months of the implementation	1 October 2019	20 December 2019 CRW.510.029.6669	Some further correspondence occurred in relation to, inter alia,

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	implementing the strategy, a charter is developed for the Crown Melbourne Responsible Gaming Management Committee (staff committee) which includes reference to the role and responsibility of driving a harm minimisation culture.	of rec. 14 (i.e., 1 October 2019)	Letter from Crown (CRW.510.029.6674) attaching the Charter (CRW.510.029.6675)		recommendation 16 in August 2020 (CRW.510.029.1856).
17	The VCGLR recommends that, by 1 July 2019, Crown undertake a robust review (with external assistance) of relevant internal control statements, including input from AUSTRAC, to ensure that anti-money laundering risks are appropriately addressed.	1 July 2019	1 July 2019 Letter (CRW.510.029.8076) attaching table (CRW.510.029.8080)	29 October 2019 CRW.510.031.0224	
19	The VCGLR recommends that, by 1 July 2019, Crown Melbourne implement a policy to make an exclusion order under section 72 of the <i>Casino Control Act</i> in appropriate cases where a person has engaged in significant unacceptable conduct in the casino or is the subject of serious criminal charges.	1 July 2019	27 May 2019 Letter (CRW.510.029.9145)	6 August 2019 CRW.510.029.5545	In its letter of 6 August 2019, the VCGLR requested that Crown make certain amendments to its Corporate Policy Statement (CRW.510.029.5545). Crown did this (CRW.510.029.9161; CRW.510.029.9154; CRW.510.029.9158) and that was acknowledged by the VCGLR (CRW.510.029.9385).
20	The VCGLR recommends that, between November 2019 and	Originally, between November 2019	N/A	N/A	

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	March 2020, VCGLR Commissioners and directors of the Crown Resorts board meet to review the implementation of the recommendations set out in this report.	and March 2020, but completion of the recommendation was deemed by the VCGLR to be no longer necessary (CRW.510.030.08 56).			

ONGOING RECOMMENDATIONS

Rec. no.	Recommendation	Status
5	The VCGLR recommends that Crown convene annual round table sessions briefing key internal staff on the VCGLR's risk-based approach to regulation, with a particular focus on how that approach relies on the integrity of Crown's internal processes.	<p>Being adhered to.</p> <p>On 7 May 2019, Crown emailed the VCGLR saying that it intended to hold the first such annual session on 21 May 2019, and asking whether there were any additional or recent materials that the VCGLR would like to have mentioned or provided at the session (CRW.510.029.2734).</p> <p>Crown sent a letter to the VCGLR on 28 June 2019 setting out how it was implementing this recommendation, including noting that it had convened a session of the kind requested on 21 May 2019 (CRW.510.029.2535).</p> <p>The VCGLR requested the minutes of that meeting and these were provided (CRW.510.029.2686; CRW.510.029.2689).</p> <p>That this recommendation was being implemented was acknowledged by the VCGLR on 29 October 2019 (CRW.510.029.8129).</p>
7	The VCGLR recommends that Crown Melbourne use observable signs in conjunction with other harm minimisation measures such as data analytics to identify patrons at risk of being harmed from gambling.	<p>Being adhered to.</p> <p>Crown sent a letter to the VCGLR on 30 December 2019 (CRW.510.029.3248) with appendices (CRW.510.029.3258; CRW.510.029.3260; CRW.510.029.3282) setting out how it was implementing, inter alia, recommendation 7.</p> <p>The VCGLR had various queries in March and June 2020 to which Crown responded (CRW.510.029.3156; CRW.510.029.3147).</p> <p>The VCLGR acknowledged the recommendation was being implemented on 19 August 2020 (CRW.709.036.9111).</p>

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18	<p>The VCGLR recommends, in all future submissions by Crown Melbourne to the VCGLR for approvals under the <i>Casino Control Act</i> or <i>Gambling Regulation Act</i>, that Crown document:</p> <ul style="list-style-type: none"> • the purpose • obligations under relevant provisions of legislation, the Transaction Documents, and existing approvals • what changes the grant of the approval would make to products, rules and procedures, etc. • risks associated with the approval and how they will be treated • how responsible gambling considerations have been taken into account in the process and the measures Crown will implement to mitigate the risk of gambling related harm, and • which areas of Crown will be responsible for managing implementation. 	<p>Being adhered to.</p> <p>Crown sent a letter to the VCGLR on 11 October 2019 setting out how it was complying and continuing to comply with recommendation 18 (CRW.510.029.9131).</p> <p>On 20 December 2019, the VCGLR confirmed Crown had been implementing recommendation 18 (CRW.510.029.6669).</p>