

To: Rowan Harris [redacted]
Cc: Jason Cremona [redacted]; Steve Thurston [redacted]
From: Michelle Fielding [redacted]
Sent: Thur 1/9/2020 10:52:13 AM (UTC+11:00)
Subject: RE: HPE CM: Sixth Casino Review - further submission - recommendation 19 [CM-COMP.FID19185]
[534737_1.pdf](#)
[534738_1.pdf](#)

Hi Rowan

Please see attached.

Regards

Michelle Fielding | Group General Manager – Regulatory and Compliance | Crown Resorts Limited

t: [redacted] | m: [redacted] | e: [redacted] | w: www.crownmelbourne.com.au

From: Rowan Harris [mailto:[redacted]]
Sent: Thursday, 9 January 2020 10:28 AM
To: Michelle Fielding
Cc: Jason Cremona; Steve Thurston
Subject: RE: HPE CM: RE: Sixth Casino Review - further submission - recommendation 19 [CM-COMP.FID19185]

Hi Michelle,

Thanks. Further to your email below, please provide draft Policy Documents by midday.

Regards

Rowan

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit
Victorian Commission for Gambling and Liquor Regulation

Level 3, 12 Shelley Street, Richmond Vic 3121 Australia

d. [redacted] m. [redacted]
 e. [redacted] www.vcglr.vic.gov.au

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From: Michelle Fielding [mailto:[redacted]]
Sent: Wednesday, 8 January 2020 9:39 PM
To: Rowan Harris [redacted]
Cc: Jason Cremona [redacted]; Steve Thurston [redacted]
Subject: HPE CM: RE: Sixth Casino Review - further submission - recommendation 19 [CM-COMP.FID19185]

That looks fine Rowan. As discussed with Jason, my main concern is that we maintain the flexibility to determine whether to WOL or Exclude on a case-by-case basis, in accordance with the particular circumstances of each matter.

I will amend the DRAFT Policy Documents and send them to you tomorrow.

Regards

Michelle Fielding | Group General Manager – Regulatory and Compliance | Crown Resorts Limited

t: [redacted] | m: [redacted] | e: [redacted] | w: www.crownmelbourne.com.au

From: Rowan Harris [mailto: [REDACTED]]
Sent: Wednesday, 8 January 2020 5:52 PM
To: Michelle Fielding
Cc: Jason Cremona; Steve Thurston
Subject: Sixth Casino Review - further submission - recommendation 19

Hi Michelle,

Further to discussion this afternoon re our request in the email below, my phone message was in relation to the following:

Now that (a) was not accepted, would Crown consider also including a footnote for "Unacceptable behavior" in clause 2.2.1 of the Exclusion Policy to refer staff to clause 2.1 of the Unacceptable Behavior Policy, in case clause 2.2 of the Exclusion Policy is read in isolation. This way both clauses of the Exclusion Policy (ie. 2.2 and 2.3) are covered in terms of referring staff to the list of "Unacceptable Behavior" in clause 2.1 of the Unacceptable Behavior Policy.

I would appreciate your earliest attention to this request.

Thanks

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit
Victorian Commission for Gambling and Liquor Regulation
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From: Rowan Harris
Sent: Wednesday, 8 January 2020 12:38 PM
To: 'Michelle Fielding' [REDACTED]
Cc: Jason Cremona [REDACTED]; Steve Thurston [REDACTED]
Subject: Sixth Casino Review - further submission - recommendation 19

Hi Michelle,

Further to your discussion with Jason today, the draft Commission paper includes the following in relation to our view that to be effective in providing the required clarity to staff, each policy should reference the fact that they should be read in conjunction with each other:

"Licensing has consulted with Crown on the matter addressed in paragraph 16, and Crown has committed* to:

- (a) including a footnote in each policy stating that it should be read in conjunction with the other noted policy
- (b) in relation to the term "unacceptable conduct" in clause 2.3 of the Exclusion Policy, include a further footnote to refer Crown staff to the list of "unacceptable behaviours" provided in clause 2.1 of the Unacceptable Behaviour Policy, and
- (c) changing the term "unacceptable conduct" in clause 2.3 of the Exclusion Policy to "unacceptable behaviour", so it aligns with the term "unacceptable behaviour" in clause 2.1 of the Unacceptable Behaviour Policy".

*Crown to confirm.

Thanks

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From: Rowan Harris
Sent: Tuesday, 7 January 2020 4:34 PM
To: 'Michelle Fielding' [REDACTED]
Cc: Jason Cremona [REDACTED]; Steve Thurston [REDACTED]
Subject: Sixth Casino Review - further submission - recommendation 19

Hi Michelle,

Further to the email below and your conversation with Jason this afternoon, to confirm that we also like Crown to consider including a further footnote in each policy stating that each policy should be read in conjunction with the other.

Thanks

Rowan

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit
Victorian Commission for Gambling and Liquor Regulation
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From: Rowan Harris
Sent: Monday, 6 January 2020 5:16 PM
To: 'Michelle Fielding' [REDACTED]
Cc: Jason Cremona [REDACTED]; Steve Thurston [REDACTED]
Subject: Sixth Casino Review - further submission - recommendation 19

Hi Michelle,

I refer to the attached documents in relation to 'Unacceptable Behavior' and 'Withdrawal of Licence – Exclusion/Self Exclusion Policy' ('Exclusion Policy') Corporate Policy Statements.

I am preparing a Commission paper in relation to Recommendation 19 – Crown Melbourne Limited's response to the Commission's request for further amendments to its corporate policy statements to ensure the policies provide greater clarity to Crown staff when to issue an exclusion order, withdrawal of licence (WoL), or both. Our preliminary view is that the documents provide acceptable clarification, subject to your assistance with the following.

In its further submission and at a meeting on 24 October 2019, Crown advised that its 'Exclusion Policy', which was issued in July 2005, when, if read in conjunction with the 'Unacceptable Behaviour Policy', provides clarity for Crown staff relating to the circumstances for issuing an exclusion order, WoL, or both. The VCGLR seeks clarity re clause 2.3 of the 'Exclusion Policy'. Where it refers to "for significant unacceptable conduct", we believe this refers to the list of "Unacceptable behaviour" provided in clause 2.1 of the 'Unacceptable Behaviour Policy'. Could you please confirm this,

and also indicate how would Crown staff know to look there for guidance on “unacceptable conduct” in clause 2.3 of the ‘Exclusion Policy’.

Would Crown consider and commit to including a footnote alongside “unacceptable conduct” in clause 2.3 of the ‘Exclusion Policy’ to make the link to the list of “unacceptable behaviour” provided in clause 2.1 of the ‘Unacceptable Behaviour Policy’. In addition, change the term ‘unacceptable conduct’ in clause 2.3 of the Exclusion Policy to ‘unacceptable behaviour’, so it aligns with the term ‘Unacceptable behaviour’ in clause 2.1 of the ‘Unacceptable behaviour Policy’.

In addition, are relevant staff aware that both policies are linked and would relevant staff have an ongoing working level awareness of these documents? Awareness of the documents may assist in supporting our view that these documents provide the required clarity for Crown staff.

I would appreciate your earliest attention to this request. Happy to discuss further.

Thanks

Rowan

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From: Michelle Fielding [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Tuesday, 3 December 2019 3:07 PM
To: Steve Thurston <[REDACTED]>
Cc: Rowan Harris <[REDACTED]>; Jason Cremona [REDACTED]
Subject: HPE CM: FW: Sixth Casino Review Prompts [CM-COMP.FID19185]

Hi Steve

Please see a further response regarding Recommendation 19 attached.

Regards

Michelle Fielding | Group General Manager – Regulatory and Compliance | Crown Resorts Limited
 t: [REDACTED] | m: [REDACTED] | e: [REDACTED] | w: www.crownmelbourne.com.au

From: Steve Thurston [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Tuesday, 12 November 2019 7:35 PM
To: Michelle Fielding
Cc: Jason Cremona; Rowan Harris
Subject: Sixth Casino Review Prompts

Hi Michelle

Just some prompts/friendly reminders, for your consideration:

1. **Recommendation 19:** When Jason and I last met with you and Josh, I think you found you had some words about WOLs versus s.72(2) Exclusion Orders in other procedural documentation that seemed to clarify to Crown staff the application of

the Corporate Policy Statement to assist them in determining when to issue an Exclusion Order, WOL, or both. I recall you talked about sharing that text with us by way of response to the Commission's follow-up request.

2. **Recommendation 15:** Your letter of 1 October on this matter said that the next CRL Responsible Gaming Committee Meeting was to be held on 9 October, at which the first of the additional responsible gambling reporting was to be presented. Are you in a position to share that first report with us in order that we can present this recommendation to the Commission at its December meeting? Also, we note Crown's proposal that, because the meeting schedules are not 2 monthly, the reports should be presented with the same frequency as each meeting (i.e. a report to every meeting). If there is a calendar for these meetings, could we have a copy to present to the Commission to support this proposal?

3. **Recommendation 20:** I only emailed you on this yesterday. Just wanting to see if we can pencil in a 2 hour placeholder for the meeting between directors and Commissioners on 12 December when they are free, but not sure whether to put this as a morning meeting or an afternoon meeting.

(Just wondering - Are you in the UK at the moment?)

Best regards

Steve Thurston | Licence Manager | Licence Management & Audit

Victorian Commission for Gambling and Liquor Regulation

Level 3, 12 Shelley St Richmond Vic 3121

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