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20 November 2017

Confidential and Commercially Sensitive

Mr Robert Chappell
Director Casino Licence Review Project
Victorian Commission for Gambling and Liquor Regulation
Level 3, 12 Shelley Street
NORTH RICHMOND VIC 3121

Copy: Rowan Harris

Dear Mr Chappell

**Sixth Review of Casino Operator and Licence - *Casino Control Act 1991* – 20 November 2017
Returnable Items (Tranche Two)**

We refer to your 'Consolidated Information Request to the Licensee and Associates' received 16 October 2017, provided as part of the Commission's sixth review of the casino operator and casino licence (**Review**) being conducted pursuant to section 25 of the *Casino Control Act 1991* (Vic), seeking information and documents.

Crown Melbourne Limited (**Crown Melbourne**) responds to each of the queries as requested with the due dates for tranche two, being 20 November 2017.

These documents and all and any information contained in them (**Material**) contains confidential and commercially sensitive information. The Material is provided to the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) in strict confidence for its sole and exclusive use in connection with the Review. It is the view of Crown Melbourne and Crown Resorts Limited (**Crown Resorts**) (collectively **Crown**) that the Material provided is exempt from disclosure under the *Freedom of Information Acts 1982* (Cth) & (Vic). As such the Material must not be placed on any file,

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Mr Robert Chappell
 Victorian Commission for Gambling and Liquor Regulation
 CONFIDENTIAL AND COMMERCIALY SENSITIVE

Page 2
 20 November 2017

register website or database that is (or possibly is) available to the public. Crown does not consent to the Material being disclosed to any third party whatsoever – whether under the *Freedom of Information Act* or otherwise – and the Material is made available strictly on this basis, and on the basis that no disclosure of the Material or any part of it be made without giving adequate prior notice to Crown in order that it may object to such disclosure.

Crown will rely on varying and historical records that it holds in replying to the information request and throughout the Review process, as well as the input of many internal stakeholders in order to compile its responses. Accordingly, our responses are made to the best of our knowledge, information, belief and interpretation.

Please find following the list of information (using the numbering from your Consolidated Information Request to the Licensee and Associates) required to be provided for tranche two and Crown's responses:

Requested Information

- 1-17 For each year from 1 January 2013, please provide the estimated annual number of visitors (and method of calculation of that number) to:
- (a) the Crown Melbourne Casino Complex;
 - (b) main gaming floor;
 - (c) Mahogany Room;
 - (d) Teak Room; and
 - (e) high roller areas other than the Mahogany Room or Teak Room.

Estimating the number of visitors to Crown Melbourne is difficult, as customers typically engage in multiple activities during each visit. Crown estimates numbers of visitors to parts of the Complex through various methods, which include:

- a) Counting unique gaming players through use of their loyalty card (rated play);
- b) Manual head counts across the gaming floor undertaken by Crown gaming floor staff;



- c) Hotel stays and restaurant covers; and
- d) Use of a pedestrian tracking system 'Reveal' that detects and counts entries and exits to and from the main gaming floor.

These estimates, together with assumptions and calculated adjustments, are estimates only, however, provide a useful range of statistics. The assumptions and calculated adjustments include:

- I. Inflation of rated patrons to account for unrated players;
- II. Reduction of Reveal numbers to account for multiple entries and exits by the same persons;
- III. Adjusting gaming players up for patrons who visit the floor but don't gamble; and
- IV. Gross up for visitors to the complex who didn't visit the gaming floor.

During the Review Period, Crown Melbourne's visitor numbers were estimated as follows:

Calendar Year	Casino	Gaming Visitation			
		MGF/Other	MHG	TEAK	Total
C2013	17,308,531	2,367,939	212,000	321,663	2,901,602
C2014	18,076,781	2,368,252	222,614	333,064	2,923,930
C2015	18,381,494	2,354,410	233,730	334,032	2,922,172
C2016	20,413,795	2,328,412	243,079	347,961	2,919,452
C2017	19,808,438	2,332,783	250,372	342,226	2,925,381

2-14 Please provide flowchart of CML's Risk Management and Assurance Overview process.

Please see Crown Melbourne's Risk Management flow chart in the folder at tab 2-14.

2-15 Please provide reports of any CML Fraud/Risk Assessments/Reviews conducted by external providers since 1 January 2013.

Please see Crown Melbourne's Fraud/Risk Assessments in the folder at tab 2-15.

Please note that the BSI recommendations were preliminary in nature and various elements were challenged by Crown's IT team. BSI did not complete the project. Commsec was



subsequently engaged to carry out a further risk assessment and has since that point in time continued to be a critical external advisor on our cyber security framework.

2-16 Please provide Risk Management Reports since 1 January 2013.

Crown Melbourne's Risk Management Reports were made available as requested and were inspected by two members of the VCGLR's Licence Review Team. Please let us know if you would like these to be made available to you to review again.

2-21 Please provide a copy of each CML Corporate Policy Statement, including Corporate Policies and Procedures Manual.

Please see Crown Melbourne's Corporate Policy Statements and Corporate Policies & Procedures Manual, in the folder at tab 2-21.

2-22 Please provide a copy of CML's Directors' Code of Conduct. What amendments been made since 1 January 2013.

Crown Melbourne does not have a Director's Code of Conduct.

2-23 Please provide analysis of CML's audit and non-audit services expenditure (Ernst & Young) by financial year from and including, the financial year ended 30 June 2013 to the financial year ended 30 June 2017.

Please see below Crown Melbourne's audit and non-audit services expenditure.

Ernst & Young Fees

	F17	F16	F15	F14	F13	Total
Audit	352,511	337,959	306,418	298,577	277,000	1,572,466
Non-Audit	245,889	122,656			8,652	377,197
Total	598,400	460,615	306,418	298,577	285,652	1,949,663



Mr Robert Chappell
Victorian Commission for Gambling and Liquor Regulation

Page 5
20 November 2017

CONFIDENTIAL AND COMMERCIALY SENSITIVE

2-24 Please provide a brief description of each matter for which Ernst & Young has been retained for non-audit related work for CRL by financial year from and including, the financial year ended 30 June 2013 to the financial year ended 30 June 2017.

Please see a brief description of each matter for which Ernst & Young has been retained for non-audit related work for Crown Resorts, in the folder at tab 2-24.

2-25 Please provide by actual and budgeted internal audit hours by auditable area, including identifying potential material breaches of gaming/casino legislation and other regulations, and Junkets, Commission Based Play, Responsible Service of Gaming and Responsible Service of Alcohol audits for each financial year from and including, the financial year ended 30 June 2013 to the financial year ended 30 June 2017.

Budgeted audit hours by audit area, including 500 hours for the quarterly follow-up and reporting of prior audit recommendations to the Crown Melbourne Board Audit Committee and Executive Management are disclosed in the annual cyclical Internal Audit Plan presented to the August meeting of the Crown Melbourne Board Audit Committee.

The Internal Audit Report presented to the August Crown Melbourne Board Audit Committee meeting contains detailed analysis of audit work undertaken in the preceding financial year against the approved audit plan, together (where applicable) with details of additional ad hoc audit work completed. Internal Audit Reports for the years F13-F17 are enclosed.

Please see Crown Melbourne's actual and budgeted internal audit hours by auditable area, in the folder at tab 2-25.

2-26 Please provide details of Internal Audit (Risk and Assurance unit) and Gaming Machines Audit units by financial year from and including, the financial year ended 30 June 2013 to the financial year ended 30 June 2017, including staff resources, reporting lines, qualifications and experience.

Please see details of Internal Audit (Risk and Assurance unit) and Gaming Machines Audit units by financial year, in the folder at tab 2-26.



- 2-27 Please provide details of internal assessments of Internal Audit (Risk and Assurance unit) since 1 January 2013.

Pursuant to the CML Board Audit Committee Charter, independence of the Crown Melbourne Internal Audit Department and staff is reviewed annually by the Crown Melbourne Board. Please see details of internal assessments of Internal Audit (Risk and Assurance unit), during the Review Period, in the folder at tab 2-27.

- 2-28 Please provide details of any external assessment of the Risk and Assurance unit since 1 January 2013.

In accordance with the Crown Melbourne Board Audit Committee Charter, an external independent quality assessment of Crown Melbourne's Internal Audit Department, against the Institute of Internal Auditors' Internal Standards for the Professional Practice of Internal Auditing must be conducted at a minimum, once every five years (last completed May 2014 – see at tab 2-28 in the folder).

Risk Management systems and practices are additionally subject to annual review by Crown Melbourne's Insurers as part of its insurance renewal process.

- 2-29 Please provide details of any reviews of the Audit Committee charter since 1 January 2013.

Pursuant to the Crown Melbourne Audit Committee Charter, the Charter must be reviewed at a minimum, on an annual basis by the Crown Melbourne Audit Committee. Please see details of reviews of the Audit Committee Charter, in the folder at tab 2-29.

- 2-31 Please provide CML's whistleblower corporate policy statement.

Please see Crown Melbourne's whistle-blower corporate policy statement, in the folder at tab 2-31.



2-32 Please make available for inspection the whistleblower register since 1 January 2013.

Please see Crown Melbourne's whistle-blower register, in the folder at tab 2-32. Please note that for this version of documents, as with the Fifth Review, we have redacted the names of the relevant participants due to the sensitive nature of whistle-blowers' frameworks. We have also redacted information that is subject to Legal Professional Privilege.¹ The redactions were also made as it is an offence for Crown to disclose the names of whistle-blowers to third parties without their consent.² Please do not hesitate to contact Joshua Preston directly if you would like to discuss these matters further.

2-33 To the extent not already disclosed in response to Item 2-32, please disclose details including the date, nature of disclosure, how the disclosure was dealt with, the outcome of any investigation and action taken by Crown of each report made between 1 January 2013 and 30 September 2017 under CML's whistleblower program.

All information has been supplied at 2-32 above.

3-5 How many withdrawals of licence or exclusion orders under section 72 of the Casino Control Act 1991 have been issued to persons for 'loan sharking' since 1 January 2013?

There have been 16 withdrawals of licence or Exclusion Orders issued to persons for 'loan sharking', during the Review Period.

3-6 How does CML enforce its policies and procedures for preventing 'loan sharking' in the casino complex?

Loan sharking, although not a specific criminal offence, is inconsistent with Crown Melbourne's practices and will not be tolerated. In instances where alleged 'loan sharking' is detected, the matter is referred to the Security Investigations Unit, Security Analyst and Surveillance Department for investigation. A Withdrawal of Licence will be issued where appropriate.

¹ I have read the material for which the privilege is claimed and am satisfied that it contains confidential information with a legal adviser, made for the purpose of obtaining legal advice.

² See section 1317AE of the *Corporations Act 2001* (Cth)



- 3-7 Please disclose how many instances of 'loan sharking' have been detected or reported in the casino complex for each year since 1 January 2013.

There have been 18 instances of 'loan sharking' detected or reported in the casino complex, during the Review Period.

Year	Number
2013	8
2014	2
2015	3
2016	3
2017	2

- 4-1 Please describe what procedures and systems are in place to prevent excluded persons from entering the casino complex or casino and how these have these changed since 1 January 2013.

Entry points to the casino gaming floor are staffed by Security Services Personnel whose responsibilities are to check prospective entrants for entry requirements such as age, behaviour (including for signs of intoxication) and Exclusion status. In certain areas of the casino, relevant staff will also check membership status. When a person is Excluded, their photograph is distributed to Security Services, Surveillance, Gaming and Responsible Gaming staff and recorded (along with relevant details) in a central database accessible to Security Services, Surveillance and Responsible Gaming staff.

At least monthly, a document containing the photograph and relevant details of persons who have applied for Self-Exclusion in the preceding month, along with a document containing the photograph and relevant details of the top recidivist breachers for the month, are circulated to relevant departments. These documents are displayed in secure and private areas, accessible only by relevant Crown staff, allowing relevant staff to become familiar with



Excluded persons, in order to effect appropriate action should they suspect they have observed someone who may be Excluded and is present on the casino gaming floor.

Loyalty Program membership accounts of Excluded persons are flagged with 'Stop Codes' and comments, which identify the person as Excluded and not permitted entry to the casino gaming floor and prevents any participation in the Loyalty Program. If a person does not have a Loyalty Program membership at the time they are Excluded, one is created by Responsible Gaming staff (for Self-Exclusions) or the Security Investigation Unit (for all other Exclusions). The

'Stop Codes' ensure that marketing material is not sent to the customer and all mailings are ceased.

In June 2014, technology was introduced in the premium gaming areas requiring members to produce their membership card or suitable identification prior to gaining room access, which is granted only when entry requirements such as membership status are verified. The technology also displays a photo of the member (if available), which is checked against the person presenting the card. Member's guests are required to provide suitable identification, which is checked against the Loyalty Program database to verify access status and check for any prohibited status such as being subject to an Exclusion Order.

The Security Investigation Unit provides Hotel Security with a full list of persons subject to a Chief Commissioner of Police Exclusion and appropriate alerts are added to their guest profiles in the hotel booking system to reduce the possibility of reservations staff taking hotel bookings from this class of Excluded persons (persons subject to a general Exclusion or Self-

Exclusion are permitted access to non-gaming areas of the Complex). The Security Investigation Unit has also been working with Victoria Police since 2011 to prosecute and/or issue penalties to persons who are frequently detected on site (as a further deterrent for them to enter).

Since January 2013, Crown has also initiated several trials of facial recognition technology.



- 4-2 Please describe what procedures and systems are in place to detect excluded persons in the casino.

Please refer to Crown's response to 4-1 above.

Additionally, while the onus is on the Excluded person to stay away from the Casino in accordance with the *Casino Control Act 1991* (Vic) and the terms of their Exclusion Order, Crown is committed to offering assistance by way of detection where possible and assistance (if relevant) in the event of a breach.

When a person is detected breaching their Self-Exclusion Order, a Responsible Gaming Liaison Officer will also attend to offer assistance and support. When possible, a Responsible Gaming Liaison Officer will discuss with the person the reasons for their breach, the assistance available through the Responsible Gaming Support Centre and available assistance through other external support services.

Crown has Member Identification Checking Kiosk (**MICK**) terminals at the Mahogany Room and Teak Room entry points and has installed the MICK application on Reception PCs. The Host/Receptionist is stationed at the podium or desk and when a patron presents their Crown loyalty card and is swiped into the MICK unit, the Host/Receptionist validate the patron's identity and therefore entitlement to enter. All patrons are required to be swiped through the MICK unit.

Patron guests must register against the member's loyalty number and must also produce ID to establish identity. Each guest's full name and DOB is searched to confirm that the guest is not Excluded.

- 4-3 Please describe Crown's processes to:
- (a) revoke a voluntary exclusion order
 - (b) revoke an involuntary exclusion order, and
 - (c) reverse a withdrawal of licence to be on the premises.



Crown Melbourne's processes are as follows:

(a) Revoke a Voluntary Exclusion Order (Self-Exclusion)

A person wishing to revoke a Self-Exclusion Order must make a formal written submission to Crown that includes a request to revoke the Self-Exclusion Order, a signed application and documentation from an accredited psychologist, psychiatrist, counsellor or medical practitioner in support of their request.

Application for revocation of a Self-Exclusion Order will only be considered after a minimum of 12 months has expired since the issuance of the Self-Exclusion Order or the last detected breach.

Crown's Responsible Gaming Psychologists make contact with the relevant external counsellor to verify their report and relays their feedback to the Self-Exclusion Revocation Committee, which considers that information. The following matters are included in questions that are asked of a counsellor submitting a report for an applicant requesting revocation:

- a) The counsellor's qualifications, in particular whether they have expertise in the field of problem gambling;
- b) Whether the applicant for revocation of Self-Exclusion sought any professional assistance in relation to their gambling behaviours following Self-Exclusion from Crown, through:
 - I. individual counselling/therapy;
 - II. financial counselling/management;
 - III. family counselling;
 - IV. group counselling/therapy; and/or
 - V. a General Practitioner.



- c) How long the counsellor has known the applicant prior to his or her approach in relation to the report;
- d) Frequency, period of treatment and whether the treatment appears to have been of benefit to the applicant;
- e) Whether formal problem gambling screening tests have been administered and if so, the results of the testing;
- f) Whether the counsellor considers that the applicant has been honest with them in relation to his or her application;
- g) Whether the presentation of the applicant gives the counsellor confidence that the applicant can responsibly manage his or her future gambling behaviours; and
- h) Any other relevant observations on the mental or physical health of the applicant.

Crown's internal Self-Exclusion Revocation Committee will, when requested by a Self-Excluded person, undertake a review of an application for revocation of his/her Self-Exclusion Order, taking into account all relevant facts.

Upon successful revocation, the person is required to attend a Gambling Resumption Information Program session at the Responsible Gaming Support Centre, where they will speak with either a Responsible Gaming Liaison Officer or the Responsible Gaming Operations Manager, prior to having access to the casino gaming floor. The person is also offered the opportunity to be contacted three months after revocation to determine whether any further support or assistance is required.

(b) Revoke an Involuntary Exclusion Order (Exclusion)

All requests to revoke Exclusion Orders (not including Withdrawals of Implied Licence to Enter and Chief Commissioner Exclusions) are redirected to the VCGLR if within 28 days of issuance.



The *Casino Control Act 1991* (Vic) provides that a person may appeal an Exclusion Order issued under section 72 of the Act. Under s 73 of the Act, a person may within 28 days of an Exclusion Order being issued, appeal in writing to the VCGLR. Crown will revoke such an Exclusion Order when directed by the VCGLR. Outside of the 28 days, Crown will allow the Exclusion Order to run for its duration, unless the Excluded person can show just cause as to why it should be revoked sooner. Applications to revoke an Exclusion Order in these circumstances will be tabled at the Person of Interest (POI) Committee Meeting for determination. Alternatively, Exclusion Orders without a set expiration date, may be revoked on application, if approved by the POI Committee.

(c) Reverse a Withdrawal of Licence to be on the Premises

A person wishing to have their Withdrawal of Licence reviewed may do so by placing their request in writing to the Security Incident Coordinator who will review, in conjunction with the General Manager Security and Surveillance (supported as required by the POI Committee) and make a decision after due consideration of the facts surrounding the circumstances.

- 4-4 Please describe CML's processes for ensuring that it does not send or direct any advertising or other promotional material to excluded persons.

Crown Melbourne's processes for ensuring that it does not send or direct any advertising or other promotional material to Excluded persons, include applying data filters across all eDirect Mail/Direct Mail customer communication channels.

A stop code/category flag is applied to all Excluded persons in the system. Stop Code categories include 'F' (Frozen Account), 'P' (Prohibited from Play) and 'X' (Excluded from the Property).

When the stop codes are added, the patron's mail codes are automatically changed by the system to N and X which means "no mail".



When a promotional list is generated for eDirect Mail/Direct Mail, whether manually or automatically, the core Exclusion filter for Excluded persons, removes these recipients from the send list prior to send.

Before any eDirect Mail/Direct Mail is sent, a series of initial filters are applied to identify 'valid patrons'.

- 4-5 Please describe how CML measures and reviews the effectiveness and appropriateness of its procedures and systems for preventing excluded persons from entering the casino.

The Responsible Gaming Department regularly reviews processes related to its operations and via the annual review of the Responsible Gambling Code of Conduct as submitted to the VCGLR. This process also calls for feedback from stakeholders and interested parties, giving Crown third-party perspectives regarding its processes.

When a person is detected breaching their Self-Exclusion Order, a Responsible Gaming Liaison Officer will attend to offer assistance and support. When possible, a Responsible Gaming Liaison Officer will discuss with the person the reasons for their breach, the assistance available through the Responsible Gaming Support Centre and available assistance through other external support services.

When a person elects to Self-Exclude, they are offered the option of being contacted three months after their Self-Exclusion commences for a follow up conversation. These conversations have provided useful feedback about the Self-Exclusion Program. Persons asked whether they have entered the casino gaming floor following their Self-Exclusion, report overwhelmingly that they have not, which is verified against breach detection records.

Security Services Officers are required to complete an incident report when any Excluded person is detected. The data obtained from incident reports are analysed on a monthly basis by the Security Department to determine if there have been any increases in the number of banned persons located on the casino gaming floor, identify peak times and hot spots for Exclusion breaches. This is also used to produce the top breacher lists and generate separate alert notices where required, to increase awareness of specific breachers.



- 4-6 From 1 January 2013, please provide a list of each patron whose self-exclusion order was revoked, the date the self-exclusion order was granted, the reason for the revocation and details regarding the process for each revocation.

The process and reason for revocation is set out above at 4-3(a), subsequent to the approval of the Self-Exclusion Revocation Committee.

Please see Crown Melbourne's list of each person whose Self-Exclusion Order was revoked and the date the Self-Exclusion Order was granted, in the folder at tab 4-6.

- 4-7 Please describe how CML monitors gamblers who have previously been an excluded person based on welfare grounds? Does CML impose on itself any restrictions on advertising, other promotional material, offers or inducements sent to gamblers who have previously been an excluded person.

Crown's Self-Exclusion and Self-Exclusion revocation processes are based on accepted evidence that problem gamblers can recover. Once a person has Self-Excluded and then successfully revokes, they have a greater insight into their gambling behaviours and awareness of Crown's Responsible Gaming programs, services and information available at the Responsible Gaming Support Centre, as well community based organisations. As described at 4-3 above, the revocation process is extensive and robust.

Upon successful revocation, the person is required to attend a Gambling Resumption Information Program session at the Responsible Gaming Support Centre, where they speak with either a Responsible Gaming Liaison Officer or the Responsible Gaming Operations Manager, prior to resuming access to the casino gaming floor. The person is also offered the opportunity to be contacted three months after revocation, to determine whether any further support or assistance is required. Having satisfied the requirements of revocation, the gambling behaviour of a previously Self-Excluded customer is subject to the same scrutiny as any other customer.

Persons who have revoked their Self-Exclusion do however have some restrictions placed on their Loyalty Program accounts. These include no immediate access to VIP membership and no marketing material sent to them for a minimum three month period. Following this



period, marketing will only be reinstated on request of the customer. The default remains that no marketing will be sent even after the three month period has ceased, unless the customer requests it.

- 4-8 Please describe how CML identifies whether commission based players have been voluntarily or involuntarily excluded in other jurisdictions.

Except as authorised by the VCGLR, Crown does not share details of Self-Exclusions with other jurisdictions as this is contrary to s 76 of the *Casino Control Act 1991* (Vic). As such, there is no process for arrangements with other jurisdictions.

Where Crown may become aware that a person is subject to a Self-Exclusion at Crown Perth, no marketing activity is initiated.

- 4-9 For each year from 1 January 2013, how many excluded persons have been:

- (a) detected in:
- (i) the Mahogany Room;
 - (ii) the Teak Room; or
 - (iii) any of the private gaming suites; and
- (b) found gambling in:
- (i) the Mahogany Room;
 - (ii) the Teak Room; or
 - (iii) any of the private gaming suites.



Please see below a table representing Excluded persons detected in the specified rooms:

	2013	2014	2015	2016	2017 (to 30/09/2017)
Mahogany Room	69	26	6	16	13
Teak Room	96	52	33	46	51
Private Gaming Suites	2	7	4	1	1
Total	167	85	43	63	65

Crown does not have records that reflect whether the Excluded persons were gambling in the specified rooms at the time they were detected.

Please see below a table representing Self-Excluded persons detected in the specified rooms:

	2013	2014	2015	2016	2017 (to 30/09/2017)
Mahogany Room	57	20	4	12	8
Private Gaming Suites	2	2	3	1	1
Teak Room	78	22	11	15	20
Total	137	44	18	28	29

Crown does not have records that reflect whether the Self-Excluded persons were gambling in the specified rooms at the time they were detected.



CONFIDENTIAL AND COMMERCIALY SENSITIVE

4-10 Please disclose how many excluded persons have been detected in the casino or casino complex for each year since 1 January 2013.

Note that other than Police Commissioner Excluded persons, Excluded Persons are permitted to enter the complex, but not the casino gaming boundary.

Please see below a table representing all Excluded persons detected in the casino, during the Review Period:

Year	Number detected
2013	1,241
2014	1,177
2015	1,550
2016	1,865
2017 (to 30/09/2017)	1,413
Total	7,246

The following table represents how many Self-Excluded persons have been detected in the casino.

Year	Number detected
2013	1,272
2014	1,280
2015	1,239
2016	1,541
2017 (to 30/09/2017)	1,077
Total	6,406



As with the Previous Review, the numbers contained in the two tables are somewhat inconsistent, as a result of the method of recording. The second table (collated by the Responsible Gaming Department) reflects all persons identified, notified and/or confirmed as being in the casino in breach of their Self-Exclusion Order. However, the first table (collated by the Security and Surveillance Departments) only includes those Excluded persons (including Self-Excluded and Police Commissioner's Excluded) identified and confirmed as being in the property in breach of their Exclusion Order.

- 4-11 For each year since 1 January 2013, please provide the number of unassisted removals of patrons from the casino complex and the ratio of unassisted removals to assisted removals.

Please see below a table representing the number of unassisted removals of patrons from the casino complex and the ratio of unassisted removals to assisted removals:

Year	Number of Peaceful Removals (Patron)	Ratio (PR:AR)
2013	16,860	20.3:1
2014	16,654	31.3:1
2015	19,638	26.7:1
2016	19,367	22.7:1
2017 (to 10/10/2017)	14,819	28.7:1

- 4-12 Please provide a list of excluded persons, including voluntarily excluded persons, for each year from 1 January 2013 to present.

Please see Crown Melbourne's list of Excluded persons, in the folder at tab 4-12.

- 4-13 Please provide a list of revocations of Self-Excluded persons for each year since 1 January 2013 to present.

Please see Crown Melbourne's list of revocations of Self-Excluded persons, in the folder at tab 4-13.



4-14 Please provide results of the 'Time-out Self Exclusion' (TOSE) trial and describe the involvement of the Victorian Responsible Gambling Foundation. Please provide results of the trial and advise whether TOSEs will be implemented.

In recognition that for some customers, Self-Exclusion is not always seen or considered as a tool to manage their gaming behaviour, Crown Melbourne has introduced the trial of a new Program called 'Time-Out'.

The Time-Out option provides an additional service whereby a customer may enter into an agreement with Crown Melbourne, undertaking not to enter the casino gaming floor for a period of 90 days.

It is important to note that the offer of the Time-Out Program is made as part of Crown Melbourne's suite of responsible gaming programs and services and only after Self-Exclusion has been declined.

As at 30 September 2017, 29 persons have participated in the Time Out Program Trial.

Crown Melbourne will be conducting the full evaluation of this trial at the cessation in January 2018. Some early data provides that:

- Two persons elected to Self-Exclude following a period on the Time-Out Program; and
- 13 persons have returned from their 90 day Time-Out Program period.

Prior to commencing the trial, Crown discussed the Time-Out Program with Mr Brett Hetherington from the Victorian Responsible Gambling Foundation late in 2016. Mr Hetherington was very supportive of the initiative. The trial has subsequently also been discussed with the Chief Executive Officer of the Victorian Responsible Gambling Foundation, Ms Louise Glanville.



CONFIDENTIAL AND COMMERCIAL SENSITIVE

- 4-15 Please provide details of detection and removal of excluded patrons, including any data in relation to recidivists since 1 January 2013 to present.

The following tables represent details of detection and removal of Self-Excluded and Excluded patrons, including data in relation to recidivists since 1 January 2013:

	2013	2014	2015	2016	2017
Total Breaches	1272	1280	1239	1541	1077
Total Persons	684	711	679	741	558
Persons with unique Breaches	437	464	456	459	369
Persons with multiple breaches	237 persons totalling 835 breaches	247 persons totalling 816 breaches	224 persons totalling 805 breaches	282 persons totalling 1068 breaches	189 persons totalling 703 breaches

	2013	2014	2015	2016	2017 (to 30/09/2017)
Total Breaches	1241	1177	1550	1865	1413
Total Persons	298	317	362	355	312
Persons with unique Breaches	161	183	206	194	167
Persons with multiple Breaches	137 persons totalling 1,080 breaches	134 persons totalling 994 breaches	156 persons totalling 1,344 breaches	161 persons totalling 1,671 breaches	145 persons totalling 1,246 breaches

- 5-1 Please provide Responsible Service of Gaming actual and budgeted expenditure by financial year from and including, the financial year ended 30 June 2013 to the financial year ended 30 June 2017, including but not limited to the Responsible Gaming Support Centre, RSG measures and initiatives, salaries, marketing, equipment costs, refresher courses and staff training.

Please see tab 5-1 in the folder, for details Responsible Service of Gaming actual and budgeted expenditure during the Review Period.

- 7-3 Please provide any Directions provided to security staff regarding safe removal of patrons following the Anthony Dunning case. In addition, any materials relating to the Anthony Dunning case, including submissions to the court, court findings and any changes to security policies and procedures arising from this case.



Crown Melbourne's Security Department continues to enhance and update its training and procedures. It has enhanced and reinforced its procedures, which include:

- a) The Introduction of the Crown Security and Services Operational Manual, which was developed in consultation with internal and external stakeholders and industry experts in health and safety. The Manual and associated training is regularly benchmarked against best practice;
- b) Introduction of enhanced communication training for security officers and the role of verbal communication - Adaptive Communications;
- c) Use of other assisted removal tactical options (other than the use of the shutdown position) where such other assisted removal options are inappropriate or unsuccessful;
- d) Highlighting and the reinforcement of risk factors associated with positional asphyxia when dealing with intoxicated patrons and patrons with certain at risk physical characteristics (including obesity) and the importance of constant monitoring of patrons during the shutdown procedures. The Manual before finalisation was provided to Associate Professor David Wells to review, who indicated on his review that the Manual was "comprehensive, well drafted and satisfactorily identifies all of the key medical issues concerning the shutdown technique and positional asphyxia";
- e) The circumstances in which an assisted removal may be required;
- f) Continued and ongoing communication between surveillance and security officers during assisted removals;
- g) The importance of supervision by appropriate security managers and role clarity during interactions with patrons;
- h) Presence and involvement of Victoria Police where appropriate;
- i) Reinforcement that the safety of all parties (patrons and staff) is an essential element of assisted removals;



- j) Continued refresher training (Tactical Options Training, First Aid Training, Adaptive Communication Training and Operational Needs Training) of full time, casual and part time security officers, with scenario based training; and
- k) Use of debriefs and weekly footage reviews of all assisted removals. Reinforcement of training through the use of Security Directives and communications to determine, on a needs basis, any additional training or feedback required collectively and/or individually on matters arising from those debriefs and reviews.

Please see tab 7-3 in the folder, for materials relating to the Anthony Dunning case. Please see tab 7-6 for Crown's Tactical Options Manual.

- 7-4 Please provide Security Services and Victoria Police liaison meeting minutes and agenda since 1 January 2013.

Please see tab 7-4 in the folder, for the Security Services and Victoria Police liaison meeting minutes and agendas.

- 7-5 Please provide any CML policies on the use of cable ties and the detention of patrons by security officers, other than the SOPs.

Please see Crown Melbourne's policies on the use of cable ties and the detention of patrons by security officers, in Crown Melbourne's Security Operational Manual in the folder at tab 7-6.

- 7-6 Please provide a copy of the Crown Security – Tactical Options Training Manual.

Please see Crown Melbourne's Security (Tactical Options) Operational Manual, in the folder at tab 7-6.

- 7-7 For each year from 1 January 2013 please provide the number and nature of:
- (a) complaints against security staff (both CML staff and contracted security staff);
 - (b) assisted removals of patrons;
 - (c) injuries to security staff (resulting from assisted removals); and



CONFIDENTIAL AND COMMERCIALY SENSITIVE

- (d) number of incidents at the casino complex leading to criminal charges being laid against CML security employees or contractors.

Please see below numbers of Crown Melbourne's security complaints and incidents.

- (a) complaints against security staff (both Crown Melbourne Limited staff and contracted security staff):

2013	83
2014	68
2015	96
2016	103
2017 (to 30/09/2017)	127

The above relate to various matters, including: staff service/service manner, alleged discrimination, removals, alleged excessive force, denied entry, intoxication assessments, dress code and mistaken identity (removed as a result of).

- (b) assisted removals of patrons;

2013	830
2014	532
2015	736
2016	852
2017 (to 30/09/2017)	517



(c) injuries to security staff (resulting from assisted removals)³; and

2013	17
2014	28
2015	26
2016	70
2017 (to 30/09/2017)	38

(d) number of incidents at the casino complex leading to criminal charges being laid against CML security employees or contractors.

Two (2).

7-8 For the period 1 January 2013 to present, please advise whether any persons been physically restrained (including by use of cable ties) and subsequently detained by security officers employed or contracted by CML, other than persons restrained and immediately ejected from the casino complex or delivered to a police officer in accordance with s. 458 of the Crimes Act 1958. If so, please provide details (including date, reason for detention, period of detention and legal basis of detention).

To our knowledge, no persons have been physically restrained and then detained, without police being called. Since 1 January 2013, there were 3,484 assisted removals conducted by Security, and 1,746 hand restraints were applied. Please see below for the yearly breakdown. We do not have the ability to segregate the data between "patrons immediately ejected from the casino complex or delivered to a police officer being escorted out of the Complex and people being arrested".

³ These statistics include reported injuries that require no treatment, first-aid treatment as well as more substantive treatment.



	Assisted Removal	Hand Restraints Applied
2013	830	505
2014	532	251
2015	736	301
2016	852	416
2017 (to October 2017)	534	273
Total	3,484	1,746

7-9 Please advise CML's policy concerning calling Victoria Police if a person is injured during an assisted removal.

Crown's policy is as set out at paragraph 2.1.5(e) of the Security Operations Standard Operating Procedures (VCGLR Approved), as follows:

(e) Call Police as soon as possible and notify them of circumstances where:

(i) a person has been restrained; and

(ii) Emergency Services other than police have attended in relation to that restraint.

7-10 Please provide any reports and documents regarding development of facial recognition technology and results of any further trials since 1 January 2013.

Please see Crown Melbourne's reports and documents regarding the development of facial recognition technology trials, in the folder at tab 7-10.



- 7-11 Please provide quarterly statistics of number of patrons refused entry to the gaming floor due to improper identification on since 1 January 2013.

Please see below a table representing the number of patrons (on a quarterly basis) refused entry to the gaming floor during the Review Period, due to improper identification:

ID Refusals					
	2013	2014	2015	2016	2017
Jan -					
Mar	14,532	14,542	15,071	19,263	12,781
Apr -					
Jun	11,851	13,176	13,439	16,626	9,109
Jul -					
Sep	14,861	14,436	15,003	16,762	
Oct -					
Dec	15,010	14,159	19,324	16,418	

- 8-2 For each year from 1 January 2013, please provide number of patron complaints relating to gaming matters including but not limited to table games and gaming machines disputes received by CML from:
- (a) commission based players;
 - (b) other patrons; and
 - (c) CML staff or contractors.

Please see a schedule of patron complaints relating to gaming matters, during the Review Period, in the folder at tab 8-2.



Mr Robert Chappell
Victorian Commission for Gambling and Liquor Regulation
CONFIDENTIAL AND COMMERCIALY SENSITIVE

Page 28
20 November 2017

Should you or your team have any queries with the information provided, please do not hesitate to contact me on [REDACTED] or Joshua Preston on [REDACTED]

Yours sincerely,

[REDACTED]

Michelle Fielding

Group General Manager – Regulatory and Compliance

Encl.