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29 June 2019

Ms Catherine Myers
 Chief Executive Officer
 Victorian Commission for Gambling and Liquor Regulation
 49 Elizabeth Street
 RICHMOND VIC 3121

cc: Rowan Harris

By Email

Dear Ms Myers

Sixth Review of the Casino Operator and Licence (Sixth Review) - Recommendation 14

I refer to Recommendation 14 of the Sixth Review and our response dated 2 July 2018. Recommendation 14 provides:

"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. The strategy should address:

- (a) early proactive intervention initiatives*
- (b) player data analytics*
- (c) proactive engagement with pre-commitment*
- (d) intervening with local players with continuous play based on shorter timeframes which are more reflective of responsible gambling*
- (e) the role of all staff in minimising harm*
- (f) the effective use and monitoring of exclusion orders*
- (g) internal reporting arrangements*
- (h) integrating responsible gambling into proposals for trialing or introduction of new products and equipment*
- (i) performance measures to assess the performance of the RGLOs, RGSC and casino staff in relation to harm minimisation*
- (j) the roles of the Crown Resorts Responsible Gambling Committee and the Responsible Gambling Management Committee in driving harm prevention strategies based on world's best practice*

- (k) *the objectives of the RGSC in relation to minimising harm to patrons, and*
- (l) *the responsible service of gambling as a fundamental core business consideration when making strategic decisions regarding casino operations.*

Over the past several months, Crown Melbourne's (**Crown**) Responsible Gaming team has undertaken a broad research and industry analysis to assess its programs and processes. This research and analysis provided a strong foundation on which to develop the Responsible Gaming Strategic Plan.

The Strategic Plan was developed with a wide-ranging current state analysis as the foundation for setting the direction. Multiple lenses of analysis were provided by internal workshops, operating data analysis, external best-practice and expert advisor input on a range of concepts, helping to frame the current challenges and identify the most relevant strategic priorities. Action and execution planning was developed by the Responsible Gaming Team and refined by senior management. Across all phases of the strategy development, the recommendations of the Sixth Review have been considered and incorporated in alignment with Crown's stated position and response.

The Strategic Plan has been approved by the Crown Resorts Responsible Gaming Board Committee, and is attached as **Appendix A**.

The Strategic Plan incorporates and references the responsible gambling recommendations raised by the Sixth Review, and addresses the points listed at (a) to (l) of the Recommendation as either initiatives or actions. However, in considering point (j), we note the following:

- The Crown Resorts Responsible Gaming Board Committee's Charter currently articulates the role of this Committee in driving harm minimisation.
- As detailed in the Strategic Plan, this Committee is responsible for overseeing the execution of strategies and monitoring the progress of initiatives against key outcomes for each strategic priority.
- A strategic priority in the Strategic Plan is currently listed as 'Maintain and continue to enhance our culture of governance and proactive management' and as the Strategic Plan is implemented, the role of this Committee will continue to be reviewed, with the Charter updated as required accordingly.
- The role of the Responsible Gambling Management Committee will be reviewed and considered as part of the implementation of Recommendation 16, which recommends the development of a charter for this Committee. This is included as an action in the Strategic Plan and will include a reference to harm minimisation.
- The relationship between these two committees, and other committees, is presented in the Strategic Plan.

Crown is strongly of the view that the completion of the key priorities referenced in the Strategic Plan will enhance our existing responsible gaming framework.

Please do not hesitate to contact me, or in my absence Joshua Preston, if you require any further information with respect to the above.

Yours sincerely,



Barry Felstead
Chief Executive Officer – Australian Resorts

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