



Victorian Commission for
Gambling and Liquor Regulation

Sixth Casino Review recommendations – progress update

TRIM ID: CD/19/8172

Recommendation

1. That the Commission notes the:
 - a) progress in relation to the nine Sixth Casino Review recommendations (the recommendations) due for completion on 1 July 2019,¹ in particular the risk that Crown Melbourne Ltd (Crown) may not meet the expectations and/or the deadline in relation to recommendations 11 and 17, and
 - b) update in relation to the remaining recommendations.

Background

2. At its meeting on 28 June 2018, the Commission adopted the findings and opinions set out in the final draft of the Sixth Casino Review report (the Report). The Report contained 20 recommendations with corresponding deadlines for Crown to implement; all of which were accepted by Crown.
3. The Licensing Division has responsibility for assessing Crown's progress in relation to addressing each of the recommendations, and providing regular updates to the Commission in relation to the adequacy of the progress.
4. As approved by the Commission at its meeting on 25 October 2018, Licensing will provide:
 - a) regular updates to the Commission in relation to progress against each recommendation, and
 - b) seek that the Commission consider Crown's submission in relation to each recommendation after the due date, and determine the status of the recommendation.
5. To track progress, Licensing has developed a schedule listing the recommendations, with both Licensing and Crown's views on progress against each recommendation (**Attachment 1**). The schedule at Attachment 1 is based on meetings with Crown and a progress report provided by Crown on 2 May 2019.
6. Recommendations 1, 2 and 8(b) were the first recommendations due for completion by 1 January 2019. A paper was presented at the Commission's meeting on 28 February 2019, and the recommendations were closed with the exception of recommendation 2.²

Issues/Comments

Recommendations at risk of unsatisfactory completion or non-completion by 1 July 2019³

7. Based on meetings with Crown, and further information provided, Licensing considers that Crown's anticipated response in relation to recommendations 11 and 17 may not meet the Commission's expectations or that Crown will fail to meet the deadline altogether.

¹ Recommendations 3, 4, 10, 11, 12, 13, 14, 17 and 19 are due for completion on 1 July 2019.

² Closure of recommendation 2 was subject to Crown completing a review of the Crown Resorts Limited committee chairs. The deadline for completion of this review is 30 May 2019.

³ Recommendations due for completion on 1 July 2019 only. Remaining recommendations are due for completion over the next two years and the adequacy of progress in relation to these recommendations will be determined closer to the due date of each recommendation.

Recommendation 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 Casino Control Act at the request of family members and friends in appropriate cases. The policy and procedure should be developed in conjunction with the VCGLR, VRGF [Victorian Responsible Gambling Foundation] and other external stakeholders. Crown Melbourne should include information about this option in all its responsible gambling publications, website and regularly provide information to relevant stakeholders, such as Gambler's Help and other similar organisations, about this option.

8. In relation to recommendation 11, progress by Crown has been slow and Licensing believes there is a risk that Crown may not meet the 1 July 2019 deadline, or if a submission is made it will not be adequate to acquit recommendation 11 to the satisfaction of the Commission.
9. Although this recommendation has been the subject of regular discussion in tripartite meetings between Crown, VCGLR and the VRGF, Crown has only recently provided any evidence of progress in relation to the development of a policy and procedure to implement third-party exclusions (TPEs).
10. On 1 April 2019, Crown provided the following draft documents to the VCGLR and VRGF for review in relation to TPEs (**Attachment 2**):
 - a) Crown 'Responsible Gaming Department Policy and Procedures' document for issuing TPEs, as adapted from the policy and procedures applied at Crown Perth
 - b) 'Third Party Exclusion Application form for Patron Exclusion' (application form), and
 - c) response letter to be provided to the applicants for the TPE.
11. In assessing the adequacy of the initial draft documents, the VCGLR and the VRGF concluded that:
 - a) they lacked sufficient detail to drive the 'end to end' process for applying, assessing and determining TPEs
 - b) they are very legalistic in content, and provide for a cumbersome and intensive process that may be potentially off-putting to *bona fide* applicants
 - c) the TPE Policy and Procedures document addresses high level procedures, but provides insufficient detail for the VCGLR to make an informed assessment of the acceptability of the process, in particular the assessment made by the committee responsible for the decision to exclude the patron identified in the TPE form or disregard the application.
12. Licensing provided a detailed response to Crown in relation to the draft documents, incorporating both its and the VRGF's suggestions to Crown regarding meeting the Commission's expectations of the TPE policy and procedure. Crown has indicated it is re-writing the draft documents based on consideration of the suggestions made.
13. A 'page turn' review of the redrafted TPE documents will be undertaken at the next tripartite meeting scheduled in the week ending 10 May 2019.
14. Considering that recommendation 11 requires Crown to 'develop and implement' a TPE policy and procedure, including provision of information in relation to this option in all its responsible gambling publications and website, there is a risk that Crown may not meet this deadline by 1 July 2019, or may provide documentation that does not sufficiently address recommendation 11.

Recommendation 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.

15. In relation to recommendation 17, Licensing has identified a risk that Crown may not meet the Commission's expectations as Crown appears to have interpreted the requirements of the recommendation inconsistently with the wording of the recommendation and Licensing's views of the actions required.
16. Licensing holds the view that an adequate response by Crown in relation to recommendation 17 would require:
- a) a review of internal control statements (ICSs) relevant to anti-money laundering, including but not limited to the Junket and Premium Player Programs ICS
 - b) input from AUSTRAC following an independent assessment of the relevant ICSs in relation to their suitability regarding anti-money laundering
 - c) amendments to the ICS to include, at a minimum, strengthening of the current ICS for Junkets and Premium Player Programs by the inclusion of more robust controls in relation to the identification of individual junket players and their associated gaming transactions when participating in junkets.
17. Licensing's view is supported by the Report which states:
- The VCGLR observes that to assist in mitigating the risks associated with junkets, the current internal control statements for junkets could be strengthened with the inclusion of more robust controls in relation to the identification of individual junket players and their associated gaming transactions when participating in junkets.⁴*
18. Licensing has articulated to Crown the expectations highlighted in paragraph 16 above, in particular that the lack of transparency of junket players' front money was the driver for this recommendation. It expects that the review of the relevant ICSs will result in the same level of transparency for individual junket player activity as there is for premium players⁵ in the ICS.
19. In response to recommendation 17, Crown has advised that it believes the suitability of the Anti-Money Laundering Counter-Terrorism Financing (AML/CTF) program it is developing is more important than the suitability of ICSs (in particular, the Junkets and Premium Player Programs ICS) in ensuring that AML/CTF risks are appropriately addressed. Crown has advised that it has been working closely with AUSTRAC to develop a joint AML program across the Melbourne and Perth casinos, and that AUSTRAC has been complimentary of its process in relation to the joint program.
20. Furthermore, Crown appears to be of the view that it is acceptable to have controls and procedures for an AML/CTF program prepared under the guidance of AUSTRAC that are distinct from controls and procedures in ICSs which are prepared pursuant to section 121 of the *Casino Control Act 1991*. However, Licensing is of the view that all controls relevant to section 121 should form the basis of ICSs even if those controls are relevant to the expectations of another regulator. The VCGLR's oversight of ICSs aims to ensure that they support all regulatory requirements contained at section 121, not just those specific to gambling.

⁴ See pages 133 to 138 of the Report.

⁵ As the names imply, a premium player is a high turnover player who attends the casino as an individual, whereas the junket players attend as part of a group of players from outside Victoria.

21. In general, Crown appears to be reluctant to involve a review of any ICSs in its response to the recommendation and does not believe AUSTRAC should be consulted about the adequacy of these documents. Crown's response to date, in Licensing's opinion, fails to address the key concerns identified in recommendation 17. Although the joint AML/CTF program is a significant project, Licensing believes that the program is not linked to recommendation 17.
22. It is also noted that the VCGLR met with AUSTRAC on 22 February 2019 to outline the VCGLR's expectations of Crown's consultation with AUSTRAC, in particular that Crown actively seek AUSTRAC's input in relation to its views on the suitability of the ICSs, including these relating to Junkets and Premium Player Programs ICS to ensure that AML risks are appropriately addressed. AUSTRAC will hold further meetings with Crown, and AUSTRAC staff have undertaken to keep the VCGLR informed about the level of consultation sought by Crown.
23. The VCGLR is concerned that discussions with Crown and its responses to date do not appear to address the recommendation. However, in Crown's scheduled update provided on 2 May 2019, it is noted that '*Internal controls are being reviewed, preliminary discussions with AUSTRAC have taken place and draft changes have been made for management review*'.

Recommendations that appear 'on-track' for completion by 1 July 2019

24. Of the remaining recommendations due by 1 July 2019, recommendations 3, 4, 10, 12, 13, 14 and 19 are considered on-track.
25. **Attachment 1** provides an update in relation to each of these recommendations. Licensing's assessment of Crown's progress in relation to each of these recommendations is positive and no matters need to be highlighted for the Commission's attention at this stage.

All other recommendations due post 1 July 2019

26. A progress update on all other recommendations is also provided in **Attachment 1**. The remaining recommendations are due for completion over the next two years and, although there are no apparent concerns at this stage, the adequacy of progress in relation to some of these recommendations will be determined closer to the due date and subsequently reported to the Commission.

Recommended:



**ALEX FITZPATRICK
DIRECTOR LICENSING**

Prepared by:
Telephone:
Date:

Rowan Harris



8 May, 2019

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
Corporate Governance and Risk					
1.	<p>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. Particular consideration should be given to:</p> <ul style="list-style-type: none"> • formulating a charter for the Crown Melbourne board • fully documenting, for visibility to the VCGLR, the reporting and decision-making relationships between all of the boards, committees and executive meetings with responsibility for, or oversight of, Melbourne Casino functions, and • elevation of governance to the group board and committees. <p>The submission should identify any changes to regulatory frameworks and how these will be addressed.</p>	1 January 2019	<p>Although not specifically related to Recommendation 1, Crown is drafting a new updated Company Constitution (Memorandum and Articles of Association), which will require the approval of the Commission in due course.</p> <p>Clause 22.2(k) of the Casino Agreement requires that the Constitution (Memorandum and Articles of Association) of the company must not be amended without the prior written approval of the Authority (Commission).</p>	The Commission approved the change program at its meeting on 28 February 2019.	<p>Status: Completed</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
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		At its meeting on 28 February 2019, the Commission noted Crown's review of the Crown Melbourne Limited committee chairs. A further submission will be provided to the Commission by 30 May 2019 in relation to a review of the Crown Resorts Limited committee chairs.	Status: on-track 
3.	The VCGLR recommends that, by 1 July 2019, Crown assess the robustness and effectiveness of its 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.	1 July 2019	<p>The Group General Manager Risk & Audit has reviewed Crown's risk framework and commenced enhancements to the framework and systems in early 2018. In this respect the enhanced risk framework has started to be rolled out across the business and is being embedded into work processes and systems.</p> <p>A new "Risk Appetite" was presented to, and ultimately approved, in December 2018 by the relevant Crown Boards and Committees.</p> <p>The supporting risk matrix was revised, approved by the business and embedded into the risk system to ensure the capture of risk profile data.</p>	Crown has advised that Deloitte has prepared a draft assessment report in relation to formalising the risk framework, including risk appetite, and developing a risk management strategy. Crown has further advised that Deloitte's draft assessment report will pass through the Crown Melbourne Limited Executive Risk Management Committee, Audit Committee and board.	Status: On-track 

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3 Cont'd			<p>Risk reporting has been restructured, and organised around seven risk categories, including the development of a key risk indicator (KRI) dashboard.</p> <p>Deloitte has also been engaged to carry out a review of the risk framework elements, and feedback has been considered and embedded where appropriate.</p> <p>The risk system has been updated to reflect the updated framework elements, and implemented across Crown Melbourne.</p>		

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

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Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
Regulatory Compliance					
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 aware of all projects and works in progress for which regulatory approvals might be relevant.	1 July 2019	<p>A Gaming Initiatives Form was developed and implemented into processes in the business and is the key action in satisfying this recommendation; along with the new Regulatory and Compliance Requirements Policy.</p> <p>A submission was made for an amendment to the Electronic Gaming Machine Internal Control Statement to provide for the Gaming Initiative Form – VCGLR approval has been received.</p> <p>Review being undertaken to determine whether additional Internal Controls require amendment.</p> <p>Although not specifically in response to this Recommendation, a new business wide compliance framework has been developed and rolled out to the business (75% of departments are now integrated into the new framework). This included the commissioning of a reporting system (known as CURA) to support the new compliance framework.</p>	<p>Crown has advised that it has completed its review of internal controls. The Gaming Initiatives Form which Crown considers as a key action in satisfying this recommendation has been implemented. The VCGLR has enquired whether this form could be referenced in other internal control statements, as it is only captured in the Gaming Machines Internal Control Statement.</p> <p>Crown advised that this would be considered.</p>	<p>Status: On-track</p> 

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4 Cont'd			<p>A detailed submission on the Compliance Framework was sent to the Chairman of the Commission on 24 December 2018, related to the Blanking Buttons matter.</p> <p>Following the review of internal controls, Crown will include a reference in relevant SOPs to Compliance being consulted prior to new initiatives being implemented.</p>		
5.	<p>The VCGLR recommends that Crown convene annual roundtable 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>	Annual	<p>An annual briefing will be provided to Management at the Crown Melbourne Executive Risk and Compliance Committee (ERCC) meeting on the VCGLR's risk-based approach and its impact on Crown and its processes.</p> <p>The next meeting of the ERCC is scheduled for 21 May 2019 and the VCGLR's risk-based approach and its impact on Crown and its processes, will be presented to the Committee at that time.</p>	<p>Licensing staff provided Crown with 'VCGLR's Regulatory Approach' document from VCGLR website.</p>	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

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Responsible Gambling					
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. This might be achieved by training more gaming staff to undertake assessments and then approach patrons identified as at risk, without the need to contact a Responsible Gaming Liaison Officer (RGLO). However, this will only be effective if those staff have sufficient time aside from their gaming duties.	1 January 2020	<p>The recruitment of 5 extra Responsible Gaming Liaison Officers has been completed. Crown now has 12 RGLOs which has assisted in having a greater presence on the gaming floor.</p> <p>The roles and responsibilities of RGLOs are being reviewed to accommodate new Responsible Gaming (RG) initiatives.</p> <p>Crown is currently reviewing the concept of gaming staff undertaking some RG specific activities.</p> <p>The Gaming Machines and Table Games staff training framework has been reviewed – Crown remains of the view that the referral to expert RG staff remains a corner stone of its RG model. However, additional training for relevant gaming staff was reviewed and adjustments will be made.</p>	No known risks or concerns with the direction being taken by Crown.	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

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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.	Ongoing	<p>Crown has developed a data analytics program called the "Crown Model", which has been developed from data and behaviours of former patrons who have self-excluded from Crown Melbourne. The Crown Model is designed as a predictive tool to assist in proactively identifying patrons who may be gambling in a manner which could be an indicator of potential harm.</p> <p>The trial of the Crown Model commenced on 25 June 2018 with operational procedures developed to respond to players of interest that are identified.</p> <p>The Crown Model is in its early stages with processes being adjusted as we learn from outputs.</p> <p>The first six-month review is complete and the team is meeting regularly to discuss refinements.</p>	No known risks or concerns.	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

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Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
8.	<p>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. These tools would utilise both historical data (with parameters developed from the second player model), and real-time monitoring of play periods. Crown Melbourne should look to models in other jurisdictions, and consult with external data analytics experts, with a view to implementing world-class, proactive approaches with real-time (or near-real time) operational effectiveness. In particular—</p> <p>(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 2020, and</p>	1 January 2020	<p>Recommendation 8(a)</p> <p>Crown Melbourne has commenced its Crown Model trial.</p> <p>Crown has commenced its review of relevant literature and other jurisdictional experiences.</p> <p>The “real time monitoring” of play periods is currently under consideration and development including the recent adjustment of Crown’s own “Play Periods” whereby RG, in conjunction with IT, is developing a reporting system, that identifies if a carded patron has been on the property for 12 hours or more and play has been recorded.</p> <p>A tool for monitoring play periods has been developed.</p> <p>Crown is considering development of an App. Based alert and case management system.</p>	<p>Recommendation 8(a)</p> <p>No known risks or concerns.</p>	<p>Recommendation 8(a)</p> <p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

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8 Cont'd	(b) for uncarded 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, with a view to reporting in detail (including legal, technical and methodological issues) to the VCGLR by 1 January 2020 and the tool being in operation by 1 July 2022.	1 January 2019, 1 January 2020 and 1 July 2022	<p>Recommendation 8(b)</p> <p>We refer to our letter dated 24 December 2018 and subsequent email correspondence with Rowan Harris dated 18 January 2019.</p> <p>Undertaking regular meetings with Gaming senior management to discuss possible approaches.</p> <p>Crown is in discussions with external parties regarding possible solutions.</p>	<p>Recommendation 8(b)</p> <p>At its meeting on 28 February 2019, the Commission in relation to recommendation 8(b) noted that for un-carded play Crown has commenced a comprehensive study of all practical options for a real-time player data analytics tool.</p> <p>No known risks or concerns.</p>	<p>Recommendation 8(b)</p> <p>Status: On-track</p> 
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)), to be completed 12 months after implementation of the tool. The independent assessment is to be undertaken by a person approved by the VCGLR, after consultation with Crown.	12 months after implementation of the tool	Will be progressed in due course.	No known risks or concerns.	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
10.	<p>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 Casino Control Act. The comprehensive review should be undertaken in conjunction with the VCGLR, VRGF and other relevant external stakeholders. The review should be undertaken with a view to implementing policies that facilitate:</p> <ul style="list-style-type: none"> ▪ Crown Melbourne issuing short term exclusion orders for 3, 6, 12 or 24 months under section 72 of the Casino Control Act, considering the specific circumstances of the person and their preferred time period for exclusion, and conditional on the person undertaking to comply with the order and with other matters (such as obtaining treatment), and 	1 July 2019	<p>First bullet point:</p> <p>Four tripartite meetings have been held to date (29 November 2018, 18 December 2018, and 15 February and 17 April 2019).</p> <p>Teleconference held with South Australian Regulator on 15 February 20018 to enquire about South Australia's experience with third party exclusions and related interventions to assist with Crown's consideration and implementation of Recommendation 11.</p>	<p>First bullet point:</p> <p>At the fourth tripartite meeting held on 17 April 2019, Crown advised the VCGLR and Victorian Responsible Gambling Foundation (VRGF) that the final draft of the submission in relation to the review of implementing policies that facilitate Crown issuing voluntary short-term exclusion orders (SEOs) for 3, 6, 12, or 24 months under section 72 of the <i>Casino Control Act 1991</i> is currently being reviewed at senior manager level.</p> <p>Crown has had ongoing internal discussions regarding 'appropriate' exclusion periods in relation to issuing voluntary SOEs, and has engaged an external provider to assist with determining the ideal approach, in particular welcoming patrons subject to SOEs back to the casino. Expiry of a SEO period would not mean a patron's automatic return to the casino. The VCGLR has enquired whether the external report would be made available. Crown advised that it will consider this but may rely on legal privilege, and may not release it.</p>	<p>First bullet point:</p> <p>Status:</p> <p>On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
10. Cont'd	<ul style="list-style-type: none"> Crown Melbourne reviewing voluntary exclusion orders which are more than 10 years old to consider whether the continued operation of these orders serves a useful purpose, with a view to retaining only those orders that are beneficial to the persons who are subject to them, and can be adequately enforced. The VCGLR further recommends that the review of such orders occurs in an orderly manner between 1 July 2019 and 30 June 2020. 	1 July 2019 and 30 June 2020	<p>Second bullet point:</p> <p>Crown has considered voluntary exclusion orders which are more than ten years old.</p>	<p>Second bullet point:</p> <p>A review has been conducted, and a submission is expected on time.</p> <p>It is expected that Crown's position will be that there is no benefit in withdrawing exclusion orders that are more than 10 years old, and conversely that there are legal risks and responsible gambling risks in doing so.</p> <p>Crown has been advised to ensure that their submission provides clear and evidenced-based support for its position to enable the Commission to make a favourable judgement about the outcome of the review.</p>	<p>Second bullet point:</p> <p>Status:</p> <p>On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
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 Casino Control Act at the request of family members and friends in appropriate cases. The policy and procedure should be developed in conjunction with the VCGLR, VRGF and other external stakeholders. Crown Melbourne should include information about this option in all its responsible gambling publications, website and regularly provide information to relevant stakeholders, such as Gambler's Help and other similar organisations, about this option.	1 July 2019	<p>The Crown Perth Third Party Exclusion Policy and Procedure document has been reviewed and adjusted, in draft, to suit Crown Melbourne.</p> <p>Crown provided the draft of the Crown Melbourne Policy and Procedure document adapted from the Crown Perth Policy and procedure to the VCGLR and VRGF on 1 April 2019.</p> <p>A first draft of the third-party exclusion policy and procedure document has been reviewed by the VCGLR and VRGF and modifications are currently being made by Crown from the feedback received.</p>	<p>The next tripartite meeting is scheduled in the week ended 10 May 2019.</p> <p>The parties will perform a 'page turn' review of the redrafted third party exclusion policy and procedure document at this meeting.</p> <p>Refer to Commission paper (paragraphs 8 to 14).</p> <p>Progress has been slow, so deadline may not be met.</p>	<p>Status: Potentially not on-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
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	<p>Crown to formally write to the VCGLR confirming that all entrances to the Casino are now covered by facial recognition cameras and to notify a commencement date for quarterly reporting on the effectiveness of the system.</p> <p>A letter to the VCGLR confirming that all entrances to the Casino are now covered by facial recognition cameras has been drafted and is in the process of being settled internally. Crown will commence providing quarterly updates from October 2019 (which will cover the period 1 July 2019 to 30 September 2019) on the effectiveness of its Facial Recognition Technology.</p>	<p>Crown has advised that installation of facial recognition technology is almost complete, and has been rolled out at casino boundary and (the wider) casino complex perimeter entrances.</p> <p>Crown has raised difficulties with ongoing reporting requirements intended to measure effectiveness. The VCGLR has advised Crown that it should consider providing written quarterly updates prior to the 1 July 2019 deadline to enable the Commission to consider effectiveness of reporting to enable the recommendation to be closed at this point in time.</p>	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
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	<p>Initial drafts of new logo are being developed.</p> <p>Marketing has been briefed regarding a refresh and a new logo has been developed – ready for internal review/approval. Strategy will be set by 1 July 2019 and roll-out will commence at that time.</p> <p>Crown is finalising the new marketing design and refresh (including logo). Nomenclature is proposed to be changed from Responsible Gambling Support Centre to Responsible Gambling Centre and Responsible Gambling Liaison Officer to Responsible Gambling Advisors. Brochures are currently under review.</p>	<p>Crown has advised that this recommendation is contingent upon completion of recommendation 14, Crown has further advised that it has settled on 'the vision' of the rebranding or refreshing of its responsible gambling messaging (about 14 words) with the Responsible Service of Gambling Sub-committee, and that a strategy has been developed behind 'the vision'.</p> <p>Adequate progress seems to have been made.</p>	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
14.	<p>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:</p> <ul style="list-style-type: none"> • early proactive intervention initiatives • player data analytics • proactive engagement with pre-commitment • intervening with local players with continuous play based on shorter timeframes which are more reflective of responsible gambling • the role of all staff in minimising harm • the effective use and monitoring of exclusion orders • internal reporting arrangements • integrating responsible gambling into proposals for trialling or introduction of new products and equipment 	1 July 2019	<p>A draft RG Strategy has been developed by the Crown Melbourne and Crown Perth Responsible Gambling leadership teams, which has been reviewed by representatives from the Crown Resorts Limited Responsible Gambling Committee and Australian Resorts Executive representatives.</p> <p>Revised draft Strategy currently being considered.</p> <p>Various elements of each specific point referred to by the VCGLR are currently being progressed (see commentary on recommendations above) or will be addressed in due course.</p> <p>A draft strategy is being prepared for senior management review and then ratification by the Crown Resorts Limited Responsible Gaming Committee.</p>	Crown has advised that this recommendation is progressing well. Implementation is planned to occur post the Commission addressing the submission.	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
14 Cont'd	<ul style="list-style-type: none"> • performance measures to assess the performance of the RGLOs, RGSC and casino staff in relation to harm minimisation the roles of the Crown Resorts Responsible Gaming Committee and the Responsible Gambling Management Committee in driving harm prevention strategies based on world's best practice • the objectives of the RGSC in relation to minimising harm to patrons, and • the responsible service of gaming as a fundamental core business consideration when making strategic decisions regarding casino operations. 				

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation (notes re symbols are on last page)
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. Regular reports every two months should include numbers and types of interventions and other harm minimisation activities of RGSC and other staff, details of the number and nature of referrals to external service providers, exclusion orders, breaches, revocation and appeals, as well as results from player data analytics and other initiatives to minimise gambling related harm. These reports should also be made available to the VCGLR for monitoring purposes. (The VCGLR intends to share this information, as appropriate, with the VRGF.)	Within three months of implementing the new responsible gambling strategy Regular reports every two months	Revised reporting to be developed in due course. Reporting drafts have been prepared for senior management.	No known risks or concerns.	Status: On-track 
16.	The VCGLR recommends that within three months of 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.	Within three months of implementing the strategy	Management is currently reviewing all Australian Resorts RG Committees to align processes where appropriate. Draft Charter is in progress.	No known risks or concerns.	Status: On-track 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
Money laundering					
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	<p>Crown has met with AUSTRAC to discuss this recommendation. A new joint AML Program across Crown's Australian Resorts is being developed and will be reviewed by an external party. AUSTRAC is being kept informed of progress.</p> <p>Internal controls are being reviewed, preliminary discussions with AUSTRAC have taken place and draft changes have been made for management review.</p>	<p>Refer to Commission paper (paragraphs 15 to 23).</p> <p>Licensing staff are concerned that the approach being taken may not align with the expectations of the Commission.</p>	<p>Status: Not on-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
Applications for approvals					
18.	<p>The VCGLR recommends, in all future submissions by Crown Melbourne to the VCGLR for approvals under the Casino Control Act or Gambling Regulation Act, 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. 	Ongoing	<p>A new template for submissions to the VCGLR for seeking approvals has been drafted and in use since July 2018. Crown Management and VCGLR Officers will continue dialogue on the form of the submission and develop it where required.</p>	No known risks or concerns.	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

Number	Recommendation	Timeframe	Crown Update	VCGLR Comment	VCGLR status of Recommendation <i>(notes re symbols are on last page)</i>
Integrity exclusion orders					
19.	The VCGLR recommends that, by 1 July 2019, Crown Melbourne implement a policy to make an exclusion order under section 72 of the Casino Control Act 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	<p>The existing 'Unacceptable Behaviour' policy statement has been reviewed and amended to strengthen the use of exclusion orders either instead of or as well as withdrawal of licences (in appropriate cases). Policy is currently under review by management.</p> <p>Management feedback has been received and policy has been updated. A letter to the VCGLR has been prepared and is currently being reviewed</p>	No known risks or concerns.	<p>Status: On-track</p> 
Review of implementation of recommendations					
20.	The VCGLR recommends that, between November 2019 and March 2020, VCGLR Commissioners and directors of the Crown Resorts board meet to review the implementation of the recommendations set out in this report.	Between November 2019 and March 2020	To be actioned in due course.	No known risks or concerns.	<p>Status: On-track</p> 

Sixth Casino Review Recommendations – Progress Update as at 2 May 2019

ATTACHMENT 1

VCGLR Status of Recommendations

	<p>Red – Not on-track.</p> <p>The recommendation is not meeting the Commission's expectations and/or deadline. There are risks and concerns.</p>
	<p>Amber – Potentially not on-track.</p> <p>The VCGLR has concerns that preparation of Crown's submission is not meeting the Commission's expectations and/or deadline.</p>
	<p>Green – On-track.</p> <p>Crown's submission is expected to meet the Commission's expectations and deadline. There are no known risks or concerns.</p>
	<p>Blue – The Commission has approved or noted Crown's submission. Recommendation is implemented and closed.</p>

ATTACHMENT 2

SUBJECT: Responsible Gaming Department Policy and Procedures

POLICY TITLE: Third Party Exclusion

APPROVED BY: Sonja Bauer

REVIEWED: March 2019

VERSION: 1.0

ISSUE DATE:

1. Policy Statement

The Third Party Exclusion is the process where a concerned family member, friend or other person, can apply to have Crown Melbourne review a customer's gambling behaviour with a view to having the customer excluded from the Casino due to problem gambling behaviours.

The 'Third Party Exclusion Application for Patron Exclusion' forms part of this Policy and Procedure.

The application is considered to be a serious undertaking and will require the Third Party to disclose and provide evidence (where possible) in relation to their concerns.

Third Party Exclusions are not suited for every circumstance and individual, and the full suite of Crown Melbourne responsible gaming programs and services, as well as government funded support services and programs will, where possible, be raised with the Applicant and the Subject.

2. Scope

The purpose of this document is to ensure that any Third Party Exclusion enquiry and/or applications are addressed by the department in a timely, consistent and professional manner, with the focus on promoting Responsible Gambling practices.

ATTACHMENT 2

This policy applies to all members of the Responsible Gaming Department. The procedure provides general guidelines to be applied when a Third Party Exclusion enquiry or application is received.

3. Responsibilities and Authorities

Responsible Gaming Operations Manager (RGOM)

- The RGOM has the responsibility to ensure that all procedures related to the Responsible Gaming department are complied with;
- The RGOM is responsible for ensuring that all Responsible Gaming Liaison Officers are trained on the SOP and that uniformity is achieved; and
- The RGOM is responsible for raising awareness of the Third Party Exclusion program amongst all staff.
- The RGOM seeks to obtain relevant information regarding a customer's personal and gambling behaviour, through feedback provided by the business and/or customer observations.

Responsible Gaming Liaison Officer (RGLO)

- The RGLO is responsible for raising awareness of the Third Party Exclusion program amongst all staff;
- The RGLO is responsible for responding to customer enquiries related to the Third Party Exclusion, providing applicants with relevant information regarding the Third Party Exclusion process and external support services available to them;

Responsible Gaming Office Coordinator (RGOC)

- The RGOC will forward the Third Party Exclusion application paperwork when requested.
- The RGOC is responsible for compiling all of the information contained in the application and any other relevant information into a report to be presented to the Third Party Exclusion Committee for consideration.

Third Party Exclusion Committee

- The Third Party Exclusion Committee is required to consider all Third Party Exclusion applications and make a recommendation.

ATTACHMENT 2**4. Procedures**

- 4.1** When receiving a Third Party Exclusion enquiry, the RGLO explains the process involved to the applicant, being:
- 4.1.1 The applicant will be sent a letter outlining the details of the process together with an application form;
 - 4.1.2 The applicant is required to submit a completed application form with all necessary supporting documentation;
 - 4.1.3 The application will be assessed by the Third Party Exclusion Committee;
 - 4.1.4 The applicant will be advised that the outcome of the assessment will not be disclosed to them.

Should the applicant decline to submit a Third Party Exclusion application, the RGLO offers the applicant the opportunity to attend the Responsible Gaming Support Centre (RGSC) to further discuss their concerns and assist them with any queries they may have regarding the customer.

- 4.2** The Third Party Exclusion Committee is provided with a completed application, including all supporting documentation and any customer information known to the business.
- 4.3** The Third Party Exclusion Committee will make a recommendation:
- 4.3.1 If the recommendation is to exclude the customer, the RGOM will contact the customer and request attendance at the RGSC for an interview. In the case that a customer is unwilling to attend an interview, an Exclusion Order under section 72 (1) of the *Casino Control Act 1991 (Vic)* is issued until such time as the customer meets with the RGOM and alleviates all concerns;
 - 4.3.2 If the recommendation is to decline the application, then no further action will be taken.



Third Party Application for Patron Exclusion

Applying for a Third Party Exclusion is a very serious undertaking. Close attention must be given to providing as much detailed and factual information to Crown Melbourne Limited ('Crown') as possible.

A Statutory Declaration is attached and forms part of the Third Party Application for Patron Exclusion. The Statutory Declaration must be signed by you and witnessed by an authorised witness; a list of authorised witnesses is attached.

I _____

(Name of Applicant)

Of _____

(Address of Applicant)

(Contact details)

Request that Crown consider excluding

(Name of Patron)

(Address of Patron)

(Contact details)

(Date of Birth)

(Relationship to Applicant)

I understand that this Third Party Application for Patron Exclusion does not place any obligation, duty or responsibility on any person. I release and indemnify Crown against any claim, liability, loss, damages, costs, fines, penalties, causes of action and expenses including legal costs that Crown may incur, suffer or be required to pay by reason of this Application.

Please either complete this form, or attach additional pages, to answer the questions on the pages that follow. This application must then be attached to the Statutory Declaration, which must be signed and witnessed by an authorised witness. Please note when the term 'the patron' is used throughout this document it refers to the individual you are requesting to have excluded from the Casino.

Is the patron aware that you are seeking to have Crown issue them excluded from the Casino?

Yes No and;

Do you consent to Crown advising the patron that you have contacted us?

Yes No and;

In seeking to raise these concerns with the patron, are we able to discuss with them the information that you have provided to us?

Yes No and;

Are you concerned about how the patron may act if they learn about your application?

Yes No

If yes, please describe your concerns:

Are you concerned about **your** safety in regards to the patron's current behaviour (for example, has their previous gambling caused changes in their behaviour, such as irritability, aggression etc.)?

Yes No

If yes, please describe your concerns:

Are you concerned about **the patron's** safety and/or welfare in regards to their current behaviour (for example, has their gambling caused depression, stress or anxiety, do they owe people money they cannot repay etc.)?

Yes No

If yes, please describe your concerns:

Does the patron believe that he/she has problematic gambling behaviours?

Yes No

Please describe what you believe to be the patron's view of their own gambling:

Has the patron ever been excluded (either voluntarily or involuntarily) from Crown or any other Casino or been issued a Withdrawal of Licence from Crown or any other Casino?

Yes No

If yes, please provide details of the exclusion or Withdrawal of Licence, including which Casino, the period of the exclusion or Withdrawal of Licence and the reasons for the exclusion or Withdrawal of Licence:

Please provide some history and background information regarding the patron's gambling (for example, when you believe their gambling began, what may have caused them to start and continue gambling, how often do they gamble etc.):

How does the patron's gambling affect you (consider financially, emotionally, socially, physically, medically)?

Is the patron's gambling negatively impacting their life (again consider financially, emotionally, socially, physically, and medically)?

Yes No

If yes, please describe:

Is the patron's gambling negatively impacting any other individuals (for example, children, friends, their employer)?

Yes No

If yes, please describe who it is impacting and how:

Has **the patron** taken any steps to deal with his/her gambling behaviours in the past (for example, attempting to stop or reduce gambling, placing financial limits on bank cards)?

Yes No

Please provide details:

Have **you** taken any steps to reduce the negative effects of the patron's gambling (for example, reducing their access to financial funds)?

Yes No

If yes, please describe:

Have you or the patron sought or received any counselling in relation to gambling?

Yes No

If yes, please provide details (for example, number of sessions, any positive impacts of counselling):

How does the patron afford his/her gambling? Please provide details such as employment, pensions, money borrowed to fund gambling, assets sold to fund gambling:

Are there other issues that the patron is dealing with that may be affecting their gambling behaviour (for example, grief, loss of job, separation etc.)?

Yes No

If yes, please describe:

Please provide any further information you believe may be useful for Crown to assess the extent to which the patron's gambling is a problem:

The following information can assist us in monitoring the patron's gambling, so please provide as much information as you can:

1) What days does the patron frequent the casino? _____

2) What times does the patron frequent the casino? _____

3) What game does the patron play? _____

4) Where in the casino does the patron normally play? _____

5) Does patron have a Crown Rewards card? _____

**** Please also attach a recent photo of the patron to this application**

Signed this _____ day of _____ 20

Before Me:

Signature of Applicant

Signature of Witness

Print Name of Applicant

Print Name of Witness

Privacy Collection Statement: Crown Melbourne collects the personal information provided in this application for the purpose of assessing this application and providing responsible gambling services. If you do not provide this information, we may not be able to provide these services. The personal information provided may be disclosed to related entities. Please refer to Crown Melbourne's privacy policy at www.crownmelbourne.com.au for full details including how to access your personal information and/or complain about a privacy breach. Crown Melbourne Limited: 8 Whiteman Street, Southbank VIC 3006, +61 3 9292 8888.

State of

Statutory

I

[full name]

of _____
[address]

_____,
[occupation]

do solemnly and sincerely declare that:-

I acknowledge that this declaration is true and correct, and I make it with the understanding and belief that a person who makes a false declaration is liable to the penalties of perjury.

Declared at _____

this _____ day of _____ 20 _____

.....
Signature of person making this declaration
[to be signed in front of an authorised witness]

Before me,

.....
Signature of Authorised Witness

The authorised witness must print or stamp his or her name, address and title under section 107A of the *Evidence (Miscellaneous Provisions) Act 1958* (as of 1 January 2010), (previously *Evidence Act 1958*), (eg. Justice of the Peace, Pharmacist, Police Officer, Court Registrar, Bank Manager, Medical Practitioner, Dentist)

Authorised witnesses for statutory declarations *Oaths, Affidavits and Statutory Declarations Act 2005*

[s 12(6)(a)]

Item	Formal description	Informal description
1.	A member of the academic staff of an institution established under any of the following Acts— <ul style="list-style-type: none"> • <i>Curtin University of Technology Act 1966</i>; • <i>Edith Cowan University Act 1984</i>; • <i>Murdoch University Act 1973</i>; • <i>University of Notre Dame Australia Act 1989</i>; • <i>University of Western Australia Act 1911</i>; • <i>Vocational Education and Training Act 1996</i> 	Academic (post-secondary institution)
2.	A member of any of the following bodies — <ul style="list-style-type: none"> • <i>Association of Taxation and Management Accountants (ACN 002 876 208)</i>; • <i>CPA Australia (ACN 008 392 452)</i>; • <i>The Institute of Chartered Accountants in Australia (ARBN 084 642 571)</i>; • <i>National Institute of Accountants (ACN 004 130 643)</i>; <i>National Tax & Accountants Association Limited (ACN 057 551 854)</i>; 	Accountant
3.	A person who is registered under the <i>Architects Act 2004</i> .	Architect
4.	An Australian Consular Officer within the meaning of the <i>Consular Fees Act 1955</i> of the Commonwealth.	Australian Consular Officer
5.	An Australian Diplomatic Officer within the meaning of the <i>Consular Fees Act 1955</i> of the Commonwealth.	Australian Diplomatic Officer
6.	A bailiff appointed under the <i>Civil Judgments Enforcement Act 2004</i> .	Bailiff
7.	A person appointed to be in charge of the head office or any branch office of an authorised deposit-taking institution carrying on business in the State under the <i>Banking Act 1959</i> of the Commonwealth.	Bank manager
8.	A member of Chartered Secretaries Australia Limited (ACN 008615950).	Chartered secretary
9.	A pharmaceutical chemist within the meaning of the <i>Pharmacy Act 1964</i> .	Chemist .
10.	A chiropractor within the meaning of the <i>Chiropractors Act 1964</i> .	Chiropractor
11.	A person registered as an auditor or a liquidator under the <i>Corporations Act 2001</i> of the Commonwealth.	Company auditor or liquidator
12.	A judge, master, magistrate, registrar or clerk, or the chief executive officer, of any court of the State or the Commonwealth.	Court officer
13.	A member of the Australian Defence Force who is — <ul style="list-style-type: none"> • <i>an officer within the meaning of the Defence Force Discipline Act 1982 of the Commonwealth</i>; . • <i>a non-commissioned officer within the meaning of that Act with 5 or more years of continuous service</i>; or • <i>a warrant officer within the meaning of that Act</i>. 	Defence force officer
14.	A dentist within the meaning of the <i>Dental Act 1939</i> .	Dentist
15.	A medical practitioner within the meaning of the <i>Medical Act 1894</i> .	Doctor
16.	A member of the Institution of Engineers, Australia, other than at the grade of student.	Engineer
17.	The secretary of an organisation of employees or employers that is registered under one of the following Acts — <ul style="list-style-type: none"> • <i>Industrial Relations Act 1979</i>; • <i>Workplace Relations Act 1996 of the Commonwealth</i>. 	Industrial organisation secretary
18.	A member of the National Insurance Brokers Association of Australia (ACN 006 093 849).	Insurance broker
19.	A Justice of the Peace.	Justice of the Peace
20.	A legal practitioner within the meaning of the <i>Legal Practice Act 2003</i> .	Lawyer
21.	The chief executive officer or deputy chief executive officer of a local government.	Local government CEO or deputy CEO
22.	A member of the council of a local government within the meaning of the <i>Local Government - Act 1995</i> .	Local government councillor

Item	Formal description	Informal description
23.	A member of the Australasian Institute of Chartered Loss Adjusters (ACN 074 804167).	Loss adjuster
24.	An authorised celebrant within the meaning of the <i>Marriage Act 1961</i> of the Commonwealth	Marriage celebrant
25.	A member of either House of Parliament of the State or of the Commonwealth.	Member of Parliament
26.	A minister of religion registered under Part IV Division 1 of the <i>Marriage Act 1961</i> of the Commonwealth.	Minister of religion
27.	A nurse within the meaning of the <i>Nurses Act 1992</i> .	Nurse
28.	A registered optometrist within the meaning of the <i>Optometrists Act 1940</i> .	Optometrist
29.	A registered patent attorney under the <i>Patents Act 1990</i> of the Commonwealth.	Patent attorney
30.	A physiotherapist within the meaning of the <i>Physiotherapists Act 1950</i> .	Physiotherapist
31.	A podiatrist within the meaning of the <i>Podiatrists Registration Act 1984</i> .	Podiatrist
32.	A police officer.	Police officer
33.	The person in charge of an office established by, or conducted by an agent of, Australia Post within the meaning of the <i>Australian Postal Corporation Act 1989</i> of the Commonwealth.	Post office manager
34.	A registered psychologist within the meaning of the <i>Psychologists Registration Act 1976</i> .	Psychologist
35.	A public notary within the meaning of the <i>Public Notaries Act 1979</i> .	Public notary
36.	An officer of the Commonwealth public service.	Public servant (Commonwealth)
37.	A person who is employed under the <i>Public Sector Management Act 1994</i> Part 3.	Public servant (State)
38.	The holder of a licence under the <i>Real Estate and Business Agents Act 1978</i> .	Real estate agent
39.	The holder of a licence under the <i>Settlement Agents Act 1981</i> .	Settlement agent
40.	The Sheriff of Western Australia and any deputy sheriff appointed by the Sheriff of Western Australia.	Sheriff or deputy sheriff
41.	A licensed surveyor within the meaning of the <i>Licensed Surveyors Act 1909</i> .	Surveyor
42.	A person employed as a member of the teaching staff within the meaning of the <i>School Education Act 1999</i> or as a teacher of a non-government school within the meaning of that <i>Act</i> .	Teacher
43.	A member, registrar or clerk, or the chief executive officer, of any tribunal of the State or the Commonwealth.	Tribunal officer
44.	A registered veterinary surgeon within the meaning of the <i>Veterinary Surgeons Act 1960</i> .	Veterinary surgeon

DATE

NAME

ADDRESS

Dear NAME

As per your conversation with a member of the Responsible Gaming Team on DATE, please find enclosed a Third Party Exclusion application.

Applying for a Third Party Exclusion is a very serious undertaking. The Third Party Exclusion application process can take time and provides no guarantee that the person you are seeking to exclude will be excluded from the Crown Melbourne Casino. Crown Melbourne encourages applicants to discuss voluntary self exclusion with the relevant person prior to lodging a Third Party Exclusion application.

It is important that you complete the Third Party Exclusion application with as much detailed information as possible. You will also be required to complete the attached Statutory Declaration, which must be signed by you and witnessed by an authorised witness; a list of authorised witnesses is attached.

Once you have completed the application and the statutory declaration please return it to the Responsible Gaming Team at the Responsible Gaming Support Centre (RGSC) at Crown Melbourne. The RGSC is located on B1, directly beneath the food court and is open 24/7. Please allow some time when dropping off your application to meet with a member of the team to discuss the information included in your application.

Due to confidentiality and privacy reasons, it is important to make you aware that Crown Melbourne is unable to provide you with any information regarding the patron you are requesting Crown Melbourne to have excluded from the Casino. This includes, but is not limited to, any gaming data and any contact we may have had with the patron. Consequently, once you have submitted your application we are unable to discuss any further aspects of the application with you, including whether we have met with the patron and whether they have been excluded from the Casino as a result of your application. We may only divulge this information to you in circumstances where the patron has signed a consent form to release information and named you as an individual on that form.

We would like to take this opportunity to remind you that Crown Melbourne has a dedicated Responsible Gaming Team on site. The team is available 24 hours a day, seven days a week and can provide information, support, assistance and/or referral to community and government services in a confidential and discrete manner. You may also like to visit our website at:

www.crownmelbourne.com.au/casino/responsible-gaming

We appreciate that trying to assist a loved one to change their gambling behaviour can be difficult, but obtaining external support can make a difference to their success and your ability to support them through the process. Some options for external support include:

- Gambler's Help is a free and confidential counselling service offered by the Victorian Responsible Gambling Foundation. The counsellors at Gambler's Help specialise in assisting with problem gambling behaviours and can also help with a variety of other life issues, including relationship and financial counselling. Gambler's Help can be contacted on 1800 858 858. Support, information, and counselling services are available 24 hours a day, seven days a week online at: www.gamblershelp.com.au
- Alternatively, you may prefer to seek assistance from a psychologist, psychiatrist, counsellor, medical practitioner or other person suitably qualified. If you would like a referral to a psychologist or psychiatrist, we recommend making an appointment with your General Practitioner for more information.

If you have any further queries, you may contact the Responsible Gaming Team directly on 1800 801 098.

Yours sincerely

SIGNATURE

Leon Pillai
Responsible Gaming Operations Manager
Crown Melbourne