

ROYAL COMMISSION INTO THE CASINO OPERATOR AND LICENCE**Statement of Shane Peter Lucas**

1. I am the Chief Executive Officer of the Victorian Responsible Gambling Foundation (**Foundation**). I joined the Foundation as CEO on 18 March 2019.
2. This statement accurately sets out the evidence that I am prepared to give to the Royal Commission into the Casino Operator and Licence (**Commission**). This statement is true and correct to the best of my knowledge and belief.
3. Where direct speech is referred to in this statement, it is provided in words or words to the effect of those, which to the best of my recollection, were used at the time.
4. The views I express in this statement are my own based on my education, training and experience. I make this statement on behalf of the Foundation and I am authorised to do so.
5. The statement is made at the request of the Commission.

Professional background

6. As CEO of the Foundation, I am responsible to its Board for the day-to-day management and administration of the operations of the Foundation. I report to the Chair of the Board, currently Anastasios Mousaferiadis.
7. I am a member of the Responsible Gambling Ministerial Advisory Council, established under section 10.2.1 of the *Gambling Regulation Act 2003*. The role of the Council is to provide advice to the Minister for Consumer Affairs, Gaming and Liquor Regulation on gambling policy and issues in the gambling environment, including how industry operates responsibly, sustainably and in a way that minimises gambling harm. The Council includes members drawn from industry, academia, local government, business, community groups and the Foundation. John Walter, a partner of Corrs, is the independent Chair of the Council.
8. My professional background has included various senior executive roles in the public, private and not-for-profit sectors. I was Global Head of Sustainable Development for ANZ Banking Group from 2010 to 2012, and CEO of Early Learning Association Australia from 2013 to 2017. From December 2017 to March 2019, I was a full time Member of the Commonwealth Administrative Appeals Tribunal (Migration Division).
9. From 2011 to 2016, I was a member of Deakin University's Advisory Board for its Master of Public Policy program, and from 2011 to 2013, I was Deputy President of the Board of Early Learning Association Australia prior to my appointment as CEO. Since August 2020, I have

been a member of the Victorian Foundation for Survivors of Torture, also called Foundation House.

10. I held a number of executive and senior management positions in the Victorian Government between 2000 and 2010, including Chief of Staff for the Victorian Minister for Industry, Trade & Industrial Relations, and Public Transport and Industrial Relations in the period 2008 to 2010; Director Corporate Planning (Department of Transport) in the period 2006 to 2008; Senior Manager, Property Development and Innovative Projects, Department of Human Services) in the period 2003 to 2006; and Senior Ministerial Adviser to the Minister for Housing and Community Services in the period 2000-2003.

Victorian Responsible Gambling Foundation

11. The Foundation is a statutory authority created by the *Victorian Responsible Gambling Foundation Act 2011 (Vic) (Act)*.
12. The Act sets out the objectives of the Foundation:
- (a) to reduce the prevalence of problem gambling and the severity of harm related to gambling; and
 - (b) to foster responsible gambling.
13. The Foundation has the functions set out in section 6 of the Act:
- (1) *The Foundation has the following functions for the purposes of achieving its objectives—*
 - (a) *to undertake preventative and other activities to address determinants of problem gambling;*
 - (b) *to conduct and facilitate education and information programs—*
 - (i) *to promote responsible gambling behaviours; and*
 - (ii) *to increase community awareness of the risks associated with gambling; and*
 - (iii) *to encourage people to seek help in relation to problem gambling;*
 - (c) *to provide treatment, counselling services and intervention services in relation to problem gambling;*

- (d) *to provide information and advice in relation to—*
- (i) *issue or grant of licences, permits, approvals, authorisations, registration or allocations under gambling legislation; and*
 - (ii) *regulation of gambling under gambling legislation;*
- (e) *to provide information to enable persons to make submissions to and participate in inquiries and public consultations relating to gambling;*
- (f) *to undertake research and evaluation activities related to its functions and objectives;*
- (g) *to advise the Minister on any matter related to the Foundation's objectives at the Minister's request;*
- (h) *to consult with the representatives of organisations, and other persons, whom the Foundation considers it desirable to consult in relation to the exercise of its other functions.*

14. The Foundation is currently governed by a Board comprised of:
- 14.1 eight appointed members; and
 - 14.2 three elected members of the Legislative Assembly.
15. The Board is accountable to the Minister for Consumer Affairs, Gaming and Liquor Regulation.
16. The Foundation is funded by the Responsible Gambling Fund which is established as an account in the Public Account in accordance with section 19 of the Act.
17. The Foundation has no regulatory powers and no statutory power to compel the provision of gambling data.
18. From time to time, the Foundation receives data on gambling entities from the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) and the Department of Justice and Community Safety (**DJCS**).
19. To facilitate the provision of data and other material, on 11 August 2017 the Foundation and VCGLR entered into a Memorandum of Understanding (**MOU**). The purposes of the MOU include establishing a framework by which the two organisations share relevant knowledge, information and data, and identify matters relevant to the organisations' common objectives

of fostering responsible gambling and minimising harm associated with problem gambling, that would benefit from a sharing of knowledge, information and data.

The Foundation's Work

20. The Foundation's Vision is a Victoria free from gambling-related harm.
21. The Foundation's Mission is to improve the health and wellbeing of Victorians by working with communities and government to deliver effective, evidence-based initiatives and innovative approaches to prevent gambling harm and to provide support for those seeking help.
22. The Foundation's focus is on supporting people who are at risk of, or are experiencing, gambling harm, be that directly or as a result of someone else's gambling.
23. The Foundation uses the following nomenclature:
 - 23.1 *Gambling harm* - any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrement to the health or wellbeing of an individual, family unit, community or population.
 - 23.2 *Problem gambling* - gambling characterised by difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.
 - 23.3 *Responsible gambling* - both responsible provision of gambling, which requires governments and industry to ensure gamblers can participate in gambling safely, and responsible consumption of gambling by consumers.
24. The Foundation regards the language used in relation to gambling and its harms as important in the context of community understanding of gambling harm. Terms such as "responsible gambling" and "gamble responsibly" as used by the gambling industry and reflected in the legislative and regulatory framework, have the effect of putting the focus of reducing and preventing harm on the individual, rather than on gambling products themselves, which may carry an inherent risk of harm, especially for vulnerable people. This can have the effect of stigmatising the individual experiencing gambling harm and shifting the primary focus of the cause of harm from the gambling products to the behaviours of the people gambling. Foundation research¹ shows that this focus on individual behaviours can be a barrier to those same individuals and affected others seeking help. Hence, the concept of gambling harm seen through a public health lens focuses on the impact of gambling activity across the broader population.

25. Gambling harms vary in their prevalence and severity. Lower-level harms include feelings of guilt or stress. Examples of more severe harm include relationship breakdown or bankruptcy.
26. The Foundation has adopted a public health approach, integral to which is the involvement of people with lived experience of gambling harm, to:
 - 26.1 inform the community about the risks of gambling harm;
 - 26.2 support effective, evidence-based initiatives and innovative approaches to prevent harm;
 - 26.3 break down barriers to seeking support; and
 - 26.4 fund the provision of professional services to those affected by gambling harm.
27. To ensure that the work of the Foundation is informed by the voice of people with lived experience of gambling harm, the Foundation established a Lived Experience Advisory Committee in 2018, the members of which provide significant insight into how people experience gambling harm.
28. In broad terms, the work of the Foundation includes:
 - 28.1 Research
 - 28.1.1 The Foundation conducts and funds research to create greater understanding of gambling harm, including problem gambling. The Foundation aims to build the gambling harm evidence base, as well as to grow research capacity and capability in Victoria and elsewhere, to reduce and prevent gambling harm at a population level.
 - 28.1.2 Each year the Foundation identifies new areas of gambling research by reference to its research agenda and runs competitive grants to learn more about how gambling continues to affect the community.
 - 28.1.3 The Foundation also commissions research projects on specific issues. This includes a general population study every four to six years to look at changes in gambling behaviour. The most recent study was for the period ending 2018/2019.
 - 28.1.4 The results of this research inform all aspects of the Foundation's work.
 - 28.1.5 All of the Foundation's research is provided to the Minister and the DJCS ahead of publication.

28.2 Monitoring the Gambling Environment

28.2.1 As they arise, the Foundation reviews issues and publicly available data relevant to the gambling environment.

28.2.2 The Foundation also responds to queries from local, state and federal governments, academia and community groups to provide data and research to inform policies and programs.

28.3 Community Awareness

28.3.1 The Foundation seeks to raise awareness across the broader community of the risks and potential harms associated with gambling. The aim is to enable as many Victorians as possible to recognise the early signs of harm, destigmatise the issue by talking about it, understand how gambling behaviours can get out of control, ensure people know how to get help if they experience harm and encourage them to seek help if they need it.

28.3.2 Initiatives include state-wide advertising campaigns, the Love the Game Sporting Club Program, a school education program, and an annual Gambling Harm Awareness Week.

28.4 Community-led prevention programs

28.4.1 The Foundation works in partnership with a diverse range of stakeholders to exchange ideas, learn from different perspectives and experiences, and develop more effective ways to prevent gambling harm.

28.4.2 It collaborates with and provides funding to a range of organisations including local governments, community-based, not-for-profit, and public health organisations to deliver innovative placed-based projects across Victoria. Projects have a focus on communities at particular risk of gambling harm, for example First Nations people, culturally and linguistically diverse communities (**CALD**), and young people. Aims include providing alternative recreation activities, reducing the stigma of gambling harm, and encouraging those affected to seek support.

28.4.3 The Foundation also works with gambling venues to help create safer gambling environments, for example by providing responsible service of gambling training to Victorian gambling venues (excluding the Casino) and by providing the Venue Support Program. This is a funded position

within each Gambler's Help agency. The role of the Venue Support Workers is to engage with gambling venue management and staff to ensure that they understand and are implementing their responsible service of gambling obligations and to give effect to the applicable Responsible Gambling Code of Conduct under the *Gambling Regulation Act 2003 (GR Act)*. For clarity, I note that Crown Melbourne Limited (**Crown**) is governed by the *Casino Control Act 1991*, not the GR Act.

28.4.4 Examples of the Foundation's prevention programs include:

- (a) the Love the Game Sporting Club Program, which is designed to interrupt the normalisation of betting on sport, including by reducing young people's exposure to gambling promotions. More than 500 elite clubs and associations (e.g., the Victorian-based AFL clubs, Cricket Victoria, Melbourne Victory) and community clubs have joined Love the Game and made a commitment to say "no" to sports betting sponsorships, and to reduce their reliance (if any) on revenue from gambling venues.
- (b) partnerships with a range of organisations to deliver programs such as:
 - "Libraries After Dark", which offers a variety of after-hours activities at various local government-run libraries across metro and regional Victoria as an alternative to gambling; and
 - "Young Leaders of the West", which involves co-designing activities to raise awareness of, and reduce stigma relating to, gambling harm among young people in Melbourne's west.
- (c) Reclink's Football and Cricket Leagues, which work closely with local agencies and community police to create socially inclusive, life-changing opportunities for socially disadvantaged members of the community. The program engages and educates participants on the effects of gambling.

28.5 Treatment and support services

The Foundation funds community health organisations across metropolitan and regional Victoria to provide the Gambler's Help service. Gambler's Help is a therapeutic and financial counselling service through which providers are required to deliver a range of services for people experiencing, or affected by, gambling

harm. Support is tailored to the needs of individuals, families and communities at particular risk of harm and includes online, telephone and face-to-face counselling, advice, information, resources and peer support. In 2019-20, 75,000 hours of Gambler's Help support was provided across Victoria.

The Foundation also partners with five Aboriginal Community Controlled Cooperatives, and various CALD organisations to deliver culturally appropriate programs and activities, as well as in-language and translation services.

28.6 Professional development

The Foundation runs a learning and development program for Gambler's Help professionals and others who work with people negatively affected by gambling. This assists practitioners to strengthen their skills and stay up to date with the latest research and clinical approaches.

The Foundation also works with other sectors to deliver more holistic services, noting gambling harm frequently co-occurs with mental health issues, misuse of alcohol and other drugs, and family violence.

29. The Foundation's budget for the current financial year is \$38.25 million, allocated as follows:
- 29.1 \$22.89 for prevention and program delivery including the Gambler's Help program;
 - 29.2 \$1.37 million for research;
 - 29.3 \$0.44 million for program evaluation;
 - 29.4 \$9.12 million for marketing and strategic campaigns; and
 - 29.5 \$4.43 million for administration including technology.

Interactions between the Foundation and Crown

30. There have been two primary avenues through which the Foundation has involved Crown in its work, being:
- 30.1 Responsible Gambling Awareness Week (pre 2018) / Gambling Harm Awareness Week (2018-onwards), referred to below. Crown was a member of the steering committee and relevant gambling industry forums prior to 2018, and has participated in the week by hosting events at Crown, establishing stalls for Crown staff to interact with customers around the Week, and displaying materials in the casino, such as digital posters on display screens.

30.2 The integration of Crown's programs with Gambler's Help services funded by the Foundation. This was an outcome of the Foundation's work with Crown and the VCGLR in relation to third party exclusions and is also referred to below.

31. The Foundation has a number of regular interactions with Crown via different forums, including the Responsible Gambling Ministerial Advisory Council. Other forums established by the Foundation include senior industry leader forums, gambling industry forums - now held as separate land-based and online forums (Crown participates in the land-based forum) - and prior to mid-2018, gambling awareness week steering committee meetings.

Gambling Industry Leaders' Forum

32. In July 2018, the Foundation established a gambling industry leaders' forum to meet twice yearly, at the Foundation. Senior representatives of the following organisations were invited to participate in the forum:

- Australian Hotels Association (Vic);
- Australian Leisure and Hospitality Group;
- Australasian Gaming Council;
- Community Clubs Victoria;
- Crown Resorts;
- Returned and Services League Victoria;
- Responsible Wagering Australia; and
- Tabcorp.

Crown was invited to participate in these forums by letter dated 2 July 2018, attached to this statement as **Exhibit SPL-01 (VRGF.0001.0001.0001)**.

33. The Foundation prepared and provided to participants a document entitled "Gambling Industry Leaders Meeting – Meeting Introduction and Induction Guide", attached to this statement as **Exhibit SPL-02 (VRGF.0001.0001.0003)**, which set out the aims and objectives of the forum as being to:

33.1 provide a mechanism to engage collectively with senior gambling industry leaders on strategic issues that would inform the Foundation's work program;

- 33.2 provide an opportunity for discussion and identification of areas of mutual interest between the Foundation and industry groups and possible action in those areas; and
- 33.3 provide a means of cultivating relationships, facilitating communication and allowing two-way information sharing and open dialogue.
34. This forum is continuing, and meetings have been held on 7 August 2018, 15 November 2018, 21 March 2019, 12 September 2019, 19 February 2020 and 4 February 2021. The Agenda for each of these meetings record that Crown has been invited to each of them. A representative of Crown has attended each of the meetings that I have chaired since March 2019. The Agendas for these meetings are attached to this statement as **Exhibit SPL-03 (VRGF.0001.0001.0006; VRGF.0001.0001.0008; VRGF.0001.0001.0010; VRGF.0001.0001.0011; VRGF.0001.0001.0013; VRGF.0001.0001.0015).**
35. Examples of issues discussed at these meetings include cashless gambling and player monitoring, and meeting participants' shared interest in maximising the uptake of support services by those experiencing harm from gambling and in preventing the progression of lower risk gamblers into higher risk groups. The Meeting Minutes for relevant meetings are attached to this statement as **Exhibit SPL-04 (VRGF.0001.0001.0017; VRGF.0001.0001.0019; VRGF.0001.0001.0021; VRGF.0001.0001.0023; VRGF.0001.0001.0025; VRGF.0001.0001.0027).**
36. The first meeting I attended was on 21 March 2019. At this meeting, there was discussion about opportunities and challenges for reducing gambling harm by reason of the prospect of moving to cashless gaming in venues, discussion of industries' ability to monitor and recognise customer capacity to make or sustain levels of gambling expenditure, and agreement by the members to continue discussion in the area of cashless gaming.

Gambling Industry Forum

37. The Foundation established gambling industry forums in about 2016, directed to identifying the issues and concerns of the gambling industry and to explore opportunities to strengthen efforts aimed at preventing gambling related harm.
38. The forums were initially for both land and online providers and moved to separate land based and online industry meetings at the request of members in September 2018, given the different operational issues faced by the two groups.
39. Participants in these meetings are represented by staff at the operational level rather than senior leaders. Industry participants include Crown, Tabcorp, Australian Hotels Association, Australian Leisure and Hospitality Group, Community Clubs Victoria, Responsible Gambling

Code of Conduct authors and Venue Service Providers such as Progressive Venue Services, Leigh Barrett and Associates, and Mercury Group. The meetings are chaired by the Foundation.

40. While I have not attended these meetings personally, I note that:

40.1 The agenda for the first land-based gambling industry issues forum in September 2018 included:

40.1.1 consultation and an invitation to participate in updating the Foundation's gaming venue best practice guide. I understand that, based on discussion at this forum, the Foundation concluded that any update should wait on the outcome of the electronic gaming machine venue code review that was underway at that time.

40.1.2 gaming venue staff gambling harm reduction;

40.1.3 industry referrals to Gambler's Help services – data and improvements;

40.1.4 self-exclusion programs – referral; and

40.1.5 access and linkages to Gambler's Help.

41. Similar items appeared on subsequent agendas.

42. The Agendas and Meeting Minutes for these meetings are attached to this statement as **Exhibit SPL-05 (VRGF.0001.0001.0029; VRGF.0001.0001.0030; VRGF.0001.0001.0032; VRGF.0001.0001.0034; VRGF.0001.0001.0036; VRGF.0001.0001.0038; VRGF.0001.0001.0040; VRGF.0001.0001.0041; VRGF.0001.0001.0043; VRGF.0001.0001.0045; VRGF.0001.0001.0046; VRGF.0001.0001.0048; VRGF.0001.0001.0050; VRGF.0001.0001.0052; VRGF.0001.0001.0053; VRGF.0001.0001.0054; VRGF.0001.0001.0055; VRGF.0001.0001.0455).**

Responsible Gambling Awareness Week / Gambling Harm Awareness Week Reference Group

43. Since its establishment, the Foundation has organised an annual one-week campaign to raise awareness of gambling harm through events hosted by the Foundation, community organisations and industry organisations. Until 2017 it was called Responsible Gambling Awareness Week. Since 2018 it has been called Gambling Harm Awareness Week in line with a change in focus away from responsible gambling language to broaden community understanding of gambling harm.

44. Between 2012 and 2017, the Foundation organised the week with a steering group of industry stakeholders. Meetings were held in the lead up to each annual week – these were usually about monthly or two-monthly in the five months or so prior to each awareness week. Crown was represented at these meetings. In addition to the meetings there was a range of operational communications between the Foundation and Crown in relation to the conduct of the week and display of materials at the casino.
45. From 2018, consultation with industry about the week took place via the gambling industry forums referred to above.
46. In addition to these formal channels for communication, I am aware of, or have been involved in, the following opportunities for information sharing with Crown:
- 46.1 The Foundation provided a confidential submission to the VCGLR Sixth Review of the Casino Operator and Licence (**Sixth Review**) in 2017. Following completion of the Sixth Review, in late 2018, the Foundation was invited by the VCGLR to participate in consultation meetings with the VCGLR and Crown in response to certain recommendations arising out of the Sixth Review. Six tripartite meetings were held between late 2018 and mid-2019.
- 46.2 From mid-2019, the VCGLR convened a number of meetings between it, Crown and the Foundation in relation to responsible service of gambling training.
- 46.3 I participated in a meeting with representatives of Crown last year in which Crown sought feedback from the Foundation about a proposal relating to certain counselling services regarding the revocation of self-excluded patrons.
- 46.4 Crown representatives have also attended Foundation events and webinars including gambling harm awareness week events.

Sixth Casino Review of the Melbourne Casino Operator and Licence

47. The Foundation provided a confidential submission dated 20 October 2017 to the Sixth Review, attached to this statement as **Exhibit SPL-06 (VRGF.0001.0001.0056)**.
48. The Foundation's submission was primarily directed to matters regarding the responsible service of gambling, with observations relating to some of the other terms of reference.
49. The submission identified specific matters that the Foundation suggested should be considered by the VCGLR as part of the Sixth Review, and set out specific questions in relation to:
- 49.1 self-exclusion;

- 49.2 pre-commitment limits on electronic gaming machines offered by the casino to its loyalty card members;
 - 49.3 staff training and identification of persons at risk as an aspect of the casino's provision of responsible gambling;
 - 49.4 Crown's Responsible Gambling Code of Conduct (**Crown's Code**) including the effectiveness of Crown's Code and how it is evaluated and reviewed;
 - 49.5 Crown's Responsible Gambling Centre; and
 - 49.6 responsible gambling information.
50. In the submission, the Foundation suggested, in relation to reductions in harm and risk of harm, that recommendations from the Sixth Review, that would have positive impacts include those that:
- 50.1 increase transparency around Crown practices and products, including giving wider access to data for independent research;
 - 50.2 result in reductions or modifications of any of Crown's promotions and practices that are identified as appealing to vulnerable patrons and patron groups;
 - 50.3 improve Crown's interventions with patrons exhibiting visible signs of distress from gambling and the take-up and policing of its Self-Exclusion Program;
 - 50.4 remove practices that ill inform customers by omission, for example regarding odds and house edge for games;
 - 50.5 remove promotions, signage and other factors that could promote common illusions of control by gamblers;
 - 50.6 improve the gaming floor environment in relation to assisting patrons' control and informed reflection; and
 - 50.7 embed (as routine) independent evaluations of new products and promotions at Crown.

Tripartite meetings associated with the Sixth Review by VCGLR

51. Eleven of the 20 recommendations set out in the VCGLR's Report of the Sixth Review (**Report**), attached to this statement as **Exhibit SPL-07 (VRGF.0001.0001.0075)**, related to Responsible Gambling (recommendations 6 to 16). The Report recommended that Crown

involve both the VCGLR and the Foundation in the implementation of the following three recommendations:

Recommendation 10

The VCGLR recommends that, by 1 July 2019, Crown Melbourne undertake a comprehensive review of its policy for the making and revocation of voluntary exclusion orders under section 72(2A) of the 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:

- *Crown Melbourne issuing short term exclusion orders for three, six, 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*
- *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.*

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 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.

...

Recommendation 14

The VCGLR recommends that, by 1 July 2019, Crown Melbourne develop and implement a responsible gambling strategy focusing on the minimisation of gambling related harm to persons attending the casino. The strategy should address:

- *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*
- *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.*

52. The Report stated at pages 122-123:

The strategy should provide opportunities for regular review of harm minimisation initiatives in response to research and in conjunction with external stakeholders such as the [the Foundation].

In developing this strategy, Crown Melbourne should work with the VCGLR and [the Foundation] to consider and assess the nature of intervention initiatives, and the risk of harm to the person in particular circumstances. The range of

interventions may include requiring a person to take a break from gambling or refusing service in certain instances, engaging more proactively with persons to discuss their gambling activity and assess potential harm, referral to a Gambler's Help Service for further assistance, prohibiting access to all gambling at the casino for a period of 14 days by making an oral involuntary exclusion order, and/or making a written involuntary exclusion order. Further, the strategy should consider persons other than RGLOs having responsibility to initiate harm minimisation interventions where a person at risk of harm is identified in the casino.

53. The VCGLR subsequently established a tripartite working group comprising Crown, the Foundation and the VCGLR to consult in relation to Crown's response to Recommendations 10 and 11. The Foundation was not consulted in relation to Recommendation 14.
54. Crown has not engaged with the Foundation on reviews of its strategy for harm minimisation initiatives in response to recommendation 14.
55. Six tripartite meetings were held between representatives of Crown, the VCGLR and the Foundation on 29 November 2018, 18 December 2018, 15 February 2019, 17 April 2019, 4 June 2019 and 14 June 2019.
56. The meetings were convened and chaired by the VCGLR.
57. Prior to the formal meetings, a meeting also took place between Crown and the Foundation, on 22 October 2018 at the request of Crown.
58. A separate meeting was also held between the Foundation and VCGLR on 20 November 2018. The minutes of that meeting note that the role of the Foundation would be to provide subject matter expert assistance and input for recommendations 10 and 11, and that the role would not be one of providing endorsement of outcomes or proposals put forward by Crown. It was also noted that the VCGLR and Foundation would endeavour to act as one voice in relation to recommendation matters.
59. The minutes of the first tripartite meeting held on 29 November 2018 set out an agreed process which included that Crown would engage the Foundation in the process specifically relating to recommendations 10 and 11 and would include:
 - 59.1 Seeking subject matter expertise in the development of policy setting;
 - 59.2 Seeking subject matter expertise concerning current responsible gambling practices and policy with a view to Crown introducing:
 - short term exclusion orders;

- revocation of longstanding exclusion orders more than 10 years old;
 - introducing third party exclusion orders and other initiatives including online exclusion order applications, and
 - consulting the Foundation on problem gambling research and case studies.
60. The minutes also note that the Foundation viewed its role as providing subject matter expert assistance and input for recommendations 10 and 11 rather than endorsing outcomes or proposals put forward by Crown.
61. I understand that, at the tripartite meetings there was discussion of Crown's proposals to meet the two recommendations.
62. The Agendas and Meeting Minutes for these meetings, excluding the meeting on 14 June 2019 for which there was no formal agenda and no minutes taken, are attached to this statement as **Exhibit SPL-08 (VRGF.0001.0001.0284; VRGF.0001.0001.0286; VRGF.0001.0001.0288; VRGF.0001.0001.0290; VRGF.0001.0001.0292; VRGF.0001.0001.0294; VRGF.0001.0001.0296; VRGF.0001.0001.0299; VRGF.0001.0001.0302; VRGF.0001.0001.0309; VRGF.0001.0001.0313)**.
63. Following the conclusion of the tripartite meetings, Crown submitted a formal response to the recommendations to the VCGLR dated 28 June 2019, attached to this statement as **Exhibit SPL-09 (VRGF.0001.0001.0316)**. The VCGLR sent this document to the Foundation for comment on 30 July 2019. The Foundation provided feedback to the VCGLR on Crown's submissions by a paper dated 1 August 2019 **Exhibit SPL-10 (VRGF. .0001.0001.0347)**.
64. Separately from the tripartite process referred to above, the VCGLR sought input from the Foundation in relation to Crown's responses to Recommendations 6, 7, 8 and 9 of the Sixth Review. The Foundation did not have any direct communication with Crown in relation to these recommendations. I note that:
- 64.1.1 Recommendation 6 provided that: *"by 1 January 2020, Crown Melbourne review its allocation of staffing resources to increase number of work hours actually available to responsible gambling and intervention with patrons"*.
- 64.1.2 Recommendation 7 provided that: *"Crown Melbourne use observable signs in conjunction with other harm minimisation measures such as starter analytics to identify patrons at risk of being harmed from gambling"*.
- 64.1.3 Recommendation 8 provided that: *"Crown Melbourne proceed with development and implementation of comprehensive data and analytic 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:

- 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*
- b) for un-carded play (that is, all other player activity), Crown Melbourne will, by 1 January 2019, commence a comprehensive study of all the practical options for a real time player data analytics tool, 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”.*

64.1.4 Recommendation 9 provided that: *“Crown Melbourne arrange, at its expense, for an independent assessment of the real-time data analytics tool for carded play (see Recommendation 8(a)) to be completed 12 months after implementation of the tool. The independent assessment to be undertaken by a person approved by the VCGLR after consultation with Crown”.*

65. Following the conclusion of the tripartite meeting process, Crown undertook a 12-month trial of its three- and six-month timeout program agreements (**TOPAs**). The trial concluded on 30 June 2020. The purpose of this trial was to gather data in relation to the timeout programs, being fixed periods of exclusion rather than a traditional self-exclusion.
66. The VCGLR sought the Foundation’s feedback regarding the TOPAs trial by email dated 22 October 2020 from Rowan Harris of the VCGLR to Tony Phillips of the Foundation, attached to this statement as **Exhibit SPL-11 (VRGF.0001.0001.0355)**. The Foundation provided a response by email from Tony Phillips to Rowan Harris dated 20 November 2020, attached to this statement as **Exhibit SPL-12 ((VRGF.0001.0001.0355)**. The Foundation has not consulted directly with Crown in relation to the TOPAs.
67. Recommendation 15 of the Report on the Sixth Review provided that within three months of implementing its new responsible gambling strategy (pursuant to recommendation 14) there was to be reporting to the Crown Resorts Responsible Gaming Committee, every two months, including certain specified information. The Committee in turn was to provide that information to the VCGLR. The recommendation also noted that the VCGLR intended to share this information with the Foundation as appropriate.

68. Consistent with this recommendation, I received a letter from the VCGLR dated 20 October 2020 enclosing reports from Crown considered by the Responsible Gaming Committee at its meetings on 9 October 2019, 4 December 2019, 11 February 2020, 1 April 2020 and 20 October 2020, attached to this statement as **Exhibit SPL-13 (VRGF.0001.0001.0362; VRGF.0001.0001.0364; VRGF.0001.0001.0368; VRGF.0001.0001.0372; VRGF.0001.0001.0376)**. I have subsequently received reports file noted with the dates of 9 February 2021 and 14 April 2021, attached to this statement as **Exhibit SPL-14 (VRGF.0001.0001.0380; VRGF.0001.0001.0384)**.

Gambler's Help Data

69. Referrals to the Gambler's Help services was discussed at the land-based gambling industry forums, referred to above. The minutes of the meeting on 5 September 2018 record that the Foundation provided data that indicated low levels of industry referral, and that members agreed to provide the Foundation with available referral data to build a better collective understanding.
70. In October 2018 the Foundation asked (by email from Brett Hetherington to Sonja Bauer and Leon Pillai of Crown, attached to this statement as **Exhibit SPL-15 (VRGF.0001.0001.0388)**) that Crown share with the Foundation information on the number of referrals that their Responsible Gaming Committee make to Gambler's Help services, and which service, to assist the Foundation with the development of its next round of funding agreements for the Gambler's Help services. Since this time, Crown has shared with the Foundation its data in connection with its Responsible Gaming Centre's referral of customers to the Gambler's Help service.

Responsible service of gaming training

71. On 16 May 2019, the VCGLR convened a meeting between it, Crown and the Foundation in relation to responsible service of gaming training at Crown. At this meeting, Crown sought clarification of the roles of the VCGLR and the Foundation in considering and approving the RSG training. The VCGLR confirmed that the VCGLR is responsible for approval, as per the *Casino Control Act 1991*, and the Foundation would provide expert advice. The Meeting Minutes and relevant correspondence are attached to this statement as **Exhibit SPL-16 (VRGF.0001.0001.0394)**.
72. Further meetings were held on 20 June 2019 and on 2 October 2019. The minutes of the meeting on 2 October 2019 record that there was discussion at the meeting about the capacity of their staff to intervene with patrons. Minutes of these meetings are attached to this statement as **Exhibit SPL-17 (VRGF.0001.0001.0398; VRGF.0001.0001.0404)**.

Advice regarding gambling products

73. The Foundation participates in the Gambling Products Working Group (formerly known as the Gambling Products Discussion Group). The Gambling Products Working Group is a group convened by the VCGLR Licensing Team that primarily deals with the licensing, regulation, and delivery of gambling products.
74. Participants at the meetings of the working group include representatives from various VCGLR units, the Foundation, and members of the Liquor and Gaming unit in the DJCS. Crown is not a party to the working group. From time to time Crown products are brought up for discussion. For example, the following Crown products (including proposed Crown products) have been considered:
- 74.1.1 Crown's "Business Class" proposal, being a gaming suite to be utilised by high rollers in a confined area of the casino.
- 74.1.2 Cashless gambling products.
- 74.1.3 "Pop Shots", an electronic gaming machine (EGM) with a skill-based component.
75. This group is continuing, and meetings were scheduled for 21 August 2018, 17 December 2018, 15 March 2019, 15 May 2019, 30 October 2019, 22 April 2020, 11 June 2020, 5 August 2020, 30 September 2020 and 6 January 2020. The Agendas and Meeting Minutes for these meetings are attached to this statement as **Exhibit SPL-18 (VRGF.0001.0001.0407; VRGF.0001.0001.0413; VRGF.0001.0001.0418; VRGF.0001.0001.0426; VRGF.0001.0001.0429; VRGF.0001.0001.0437; VRGF.0001.0001.0441; VRGF.0001.0001.0459; VRGF.0001.0001.0461; VRGF.0001.0001.0462; VRGF.0001.0001.0463; VRGF.0001.0001.0465; VRGF.0001.0001.0468; VRGF.0001.0001.0470; VRGF.0001.0001.0474; VRGF.0001.0001.0476; VRGF.0001.0001.0486; VRGF.0001.0001.0488).**
76. The Foundation has also been asked by the VCGLR to provide advice, from time to time, in relation to products proposed to be introduced by Crown including:
- 76.1 To provide confidential advice regarding Crown's proposal to introduce a spread betting feature for roulette. The Foundation provided written advice to the VCGLR dated 27 February 2017, in which the Foundation identified a number of concerns with the feature, including:
- 76.1.1 likely confusion of players about the odds of winning;
- 76.1.2 an increase in aspects of continuous play, which is associated with harm;
- 76.1.3 possibility to encourage the illusion of control; and

- 76.1.4 potential to increase bet sizes.
- 76.2 To provide confidential advice regarding Crown's proposal for an automated chip dispensing machine. The Foundation provided written advice to the VCGLR dated 16 January 2018, in which the Foundation stated that it was opposed to such a device being approved for the following reasons:
- 76.2.1 the device erodes the responsible gambling environment by removing interaction with staff;
- 76.2.2 the device contributes to the depersonalisation of the gambling environment at Crown; and
- 76.2.3 the approval of the device would be inconsistent with government policy at the time to increase interaction with gambling venue staff as a means to reduce gambling harm.

Other meetings and communication

77. After my appointment as Foundation CEO, I was invited by Chris Reilly of Crown to take a tour of Crown's facilities, including the casino. Anastasios Mousaferiadis, who was then a member of the Foundation's Board but not the Board Chair, Brett Hetherington and I attended Crown on 28 May 2019 and toured the casino's facilities and gaming areas. Chris Reilly and Sonja Bauer of Crown led that tour. Among other things, we were advised of what Crown was doing from a responsible service of gaming perspective and its operations as an integrated resort.
78. In his role as the Senior Industry Engagement Co-ordinator, Brett Hetherington has contact with industry participants including Crown. An example of communication with Crown is an email sent by him to Luke Overman, Crown's General Manager Responsible Gaming, dated 15 September 2020, attached to this statement as **Exhibit SPL-19 (VRGF.0001.0001.0449)**, which stated in part as follows:

I am writing following a conversation with one of our Gambler's Help Services earlier today. They raised some concerns around clients' expectations related to revocation of self-exclusion from Crown and the conduct of some clients with their counsellors.

I thought that it might be a good reason for us to arrange a quick virtual meeting to be able to:

- *Introduce ourselves and say g'day (particularly given your recent start in the role and the delay in our intended Gambling Industry Forum meeting)*

- *Confirm Crown's Self-Exclusion and Revocation process (just to make sure I have it right)*
- *Discuss the Foundation's advice and direction to GH Agencies around supporting Crown exclusion (particularly revocation)*
- *Confirm any changes to our current approach.*

79. Luke's reply to that email of 16 September 2020 confirmed that he would be "*happy to discuss Revocation in detail with you. We would also like to discuss a few things in relation to potential changes in our processes*". This correspondence is attached to this statement as **Exhibit SPL-20 (VRGF.0001.0001.0449)**.
80. Brett and I subsequently met, via Microsoft Teams, with Luke Overman and Chris Reilly of Crown on 29 September 2020. At the meeting we discussed Luke's employment background and his recent appointment to his role at Crown, and their process for referrals to Gambler's Help.
81. Following that meeting, by an email from Kate Earl of Crown to Tony Clarkson (Principal Clinical Adviser of the Foundation) dated 8 October 2020, attached to this statement as **Exhibit SPL-21 (VRGF.0001.0001.0451)**, Crown provided a paper setting out a proposal to establish a direct referral service for revocations customers (i.e. people seeking to have their self-exclusion from gambling set aside) to a single service provider in the one location rather than to providers in a range of locations, attached to this statement as **Exhibit SPL-22 (VRGF.0001.0001.0453)**.
82. Brett Hetherington and Tony Clarkson met with Kate Earl, Susan McNulty and Luke Overman in relation to Crown's proposal, following which further communication took place between Crown and the Foundation in relation to the proposed process by which Crown sought assistance and permission to engage with Connect Health. I understand that Connect Health and Crown are developing a protocol for revocation referrals.

Harm Reduction

83. The Foundation has been asked by the Commission to express an opinion in response to the following:
- 83.1 whether Crown takes sufficient steps to minimise the harm caused by gambling and to ensure the responsible service of gambling;
- 83.2 what steps should Crown be taking to minimise the harm caused by gambling and to ensure the responsible service of gambling?

84. I have been provided with, and have read, the Statement of Rosa Billi dated 10 May 2021 which refers to research undertaken in relation to gambling harm and its impact on individuals, communities and affected others including research and population surveys undertaken by and on behalf of the Foundation, and research funded by the Foundation. This research, together with other research on gambling, informs the Foundation's work and the views that I express below.
85. It is the Foundation's view that Crown could reduce the harm caused by gambling at the Casino by:
- 85.1 aligning the management of EGMs with the regulatory restrictions placed on other Victorian venues;
 - 85.2 imposing stricter time and monetary limits on individuals' gambling activity;
 - 85.3 intervening when EGM gamblers show "validated observable signs" related to potential problem gambling behaviours, rather than Crown's modified list of observable signs.
 - 85.4 With respect to data:
 - 85.4.1 ensure that it is being used to adopt an evidence-based approach to minimising gambling harm, for example, with the use of real time data to support Crown's staff to intervene when a patron has reached a time or money limit;
 - 85.4.2 making their data on gambling activity more readily available to researchers to assist with:
 - (a) the development of practices and policies that minimise gambling harm; and
 - (b) the review of existing and proposed new products that are not accessible at other gambling venues. For example, Crown is the only gambling venue in Victoria that has table games. This includes Fully Automated Table Games (**FATGs**) and Semi Automated Table Games (**SATGs**), both of which have a number of features that are similar to EGMs. For example, features that increase the speed of betting, an identified risk for gambling harm.

EGMs

86. In her statement Rosa notes that:

- 86.1 EGMs have been shown to have a strong association with gambling harm and are recognised as a source of harm.
- 86.2 Research that has examined the structural characteristics of EGMs has identified a range of factors associated with gambling harm including:
- 86.2.1 the rapid speed of play relative to other forms of gambling;
 - 86.2.2 lack of natural breaks; and
 - 86.2.3 highly variable and unpredictable outcomes, together with game characteristics such as “near misses” and “losses disguised as wins” (where a player loses more than they stake yet the outcome is accompanied by celebratory machine sounds and graphics that occur when a player wins),
- lead to persistent play in the face of losses, particularly among those experiencing gambling harm.

Restrictions on Delivery

87. Under the GR Act, EGM venues have a number of restrictions placed on their operation of the EGMs - imposed to minimise gambling harm - that Crown is not subjected to pursuant to its regulatory regime.
88. These differences include the following:
- 88.1 Hours of Operation
 - 88.1.1 Crown is able to operate its EGMs and other gambling products 24 hours a day, making it highly accessible to those wanting to gamble.
 - 88.1.2 In comparison, clubs and hotels with EGMs must close their gaming rooms for at least four hours per day, leading to an enforced break from gambling for patrons.
 - 88.2 Restricted v Unrestricted Mode
 - 88.2.1 1,000 of Crown’s 2,628 EGMs can operate in “unrestricted mode” at any one time. Other Victorian venues are required to operate all of their EGMs in restricted mode.
 - 88.2.2 The unrestricted mode for EGMs enables the machines to operate in a mode where spin rate, bet limit, autoplay and note acceptors are

unrestrictedⁱⁱ. Table A below sets out the differences in restrictions on EGM features operating in clubs, hotels and the casino.

Table A

EGM features	Clubs & Hotels	Crown (restricted mode)	Crown (unrestricted mode)
Spin rate	Cannot be shorter than 2.14 seconds	Cannot be shorter than 2.14 seconds	No restriction
Bank note acceptor	Cannot accept bank notes greater than \$50	Cannot accept bank notes greater than \$50	No restriction
Load up limit	Limit of \$1000	Limit of \$9949	No restriction
Pay out limit	Winnings over \$2000 must be paid by cheque	Winnings over \$2000 must be paid by cheque	No restriction
Autoplay	Prohibited	Prohibited	Allowed
Maximum bet per spin	\$5	\$10	No restriction

88.2.3 I refer again to Rosa's statement in which she references a population study that found approximately 61 per cent of people gambling on EGMs at Crown who were experiencing 'problem gambling' had used an unrestricted EGM in the previous 12 months.

Limits on Gambling Activity

89. Crown operates two systems that enable customers to set time and money limits on their gambling. *YourPlay* is available when using EGMs and *Playsafe* for use on FATGs.
90. *YourPlay* is the Victorian government prescribed pre-commitment system for EGMs. It is a card-based system that allows a person to set time and/or loss limits on their EGM gambling. It notifies the person gambling, via the EGM, when they are approaching and have reached their selected time or loss limit. It also provides the *YourPlay* user with real-time access to their EGM history, including time spent and loss records. The *YourPlay* system places no restrictions on time or loss limits that can be set by the cardholder and does not prevent a person from continuing to gamble once a limit has been reached.
91. In order to play an EGM in unrestricted mode at Crown, a person is required to have a *YourPlay* account and to have set both a time and loss limit.ⁱⁱⁱ
92. *Playsafe* is Crown's limit setting system for its FATGs. Its functionality is similar to *YourPlay* (although it does not have an online portal). There is no limit setting system for non-automatic or semi-automatic table games or other forms of gambling in the casino.
93. The evaluation of *YourPlay* commissioned by the DJCS and published in 2019, found that, as at January 2019, the median monetary limit set was \$50,000 per day while the most

commonly chosen daily limit was \$1,000,000 per day.^{iv} The evaluators also observed that, where a *YourPlay* card with an unreached limit was inserted, the EGM switched into unrestricted mode without the customer making an explicit choice to gamble that way.

94. A best practice responsible gambling program would ensure that:

94.1 customers are encouraged and assisted to set realistic and affordable limits adopting the evidence about monetary and time limits – in this regard I refer to paragraph 43 of the statement of Rosa Billi; and

94.2 limits are set on products.

Intervention

95. The Report of the Sixth Review notes, at page 92, that there appears to be insufficient intervention by Crown with customers before they experience a significant crisis.

96. The Foundation is not aware whether or not Crown has improved the operation or effectiveness of its interventions, however it makes the following observations:

Intervention when Limits are reached

96.1 Both *YourPlay* and *Playsafe* allow a person to continue gambling when a limit is reached, with the only consequence being that the accumulation of *Crown Rewards* loyalty points ceases.

96.2 The VCGLR noted in its Report of the Sixth Review that:

...when a person reaches a limit under the YourPlay system and elects to continue playing, Crown Melbourne staff take no action and there is no regulatory obligation on them to do so.

96.3 It is the Foundation's opinion that it should be incumbent on Crown to intervene when a person reaches a limit but continues to gamble.

Intervention based on 'Observable Signs'

96.4 Crown's Code states, at page 15:

A customer displaying observable signs that may be related to potential problem gaming behaviours or unacceptable behaviour will be approached by a staff member who will offer assistance and referrals to specialist support as required.

96.5 This commitment is less proscriptive than the commitment in the codes adopted by clubs and hotels which state that EGM venue operators are required to:

...take all reasonable steps to prevent and minimise harm from the operation of gaming machines in the approved venue, including by monitoring the welfare of gaming machine players, discouraging intensive and prolonged gaming machine play and intervening when a person is displaying behaviour that is consistent with gambling harm.

96.6 Crown’s Code sets out a list of “observable signs” stated to be “adapted” from Thomas et al’s (2014)^v work that validated a list of observable behaviours that may indicate a person is having a problem with their gambling on EGMs.

96.7 RSG training for EGM venue staff, regulated by the GR Act and required by their Code of Conduct, references the Thomas et al list of validated observable signs.

96.8 The differences between the Thomas et al “validated observable signs” and Crown’s list of observable signs are set out in Table B below.

Table B: Comparison of Gambling Behaviour Checklist and Crown’s Code

Gambling Behaviour Checklist for EGM Staff in Victoria*	Crown Responsible Gambling Code of Conduct observable signs of problem gambling[^]
<p>Loss of Control</p> <ul style="list-style-type: none"> • Tries obsessively to win on one machine • Gambles right through normal meal times • Finds it difficult to stop gambling at closing time • Starts gambling when the venue is opening or only stops when venue is closing <p>Money Seeking</p> <ul style="list-style-type: none"> • Gets cash out on 2 or more occasions through EFTPOS • Puts large wins back into the machine and keeps playing • Has run out of all money when he/she leaves venue • Leaves venue to find money to continue gambling • Asks to change large notes at venue before gambling • Rummages around in purse or wallet for additional money • Witnessed or heard that a customer was trying to borrow money from other people at venue or asking for credit from venue <p>Intensity and Duration</p> <ul style="list-style-type: none"> • Spends \$300 or more in a session • Often gambles for long periods (3+ hours) without a proper break • Bets \$3 or more per spin most of the time • Plays very fast 	<ul style="list-style-type: none"> • Self-disclosure of a problem with gaming or request to voluntarily exclude • Gets angry while gaming or shows signs of distress during or after gaming • Often gambles for long periods without a break • Witnessed or heard that a customer was trying to borrow money for gaming • Significant decline in personal grooming or appearance • Observed conflict over gaming between family members or friends • Unrealistic remarks about gaming • Children left unattended whilst parent/guardian gambles • Complains to staff about losing or blames the casino or gaming product for losing • Secretive or embarrassed about being at the casino or stays on to gamble when friends leave the venue • Gambles without reacting to what is going on around him/her and avoids contact or conversations with others • Frequent visits to the ATM • Requests for assistance from family and/or friends concerned about an individual’s gaming behaviour.

<ul style="list-style-type: none"> • Gambles on 2 or more machines at once • Gambles intensely without reacting to what's going on around him/her • Gambles most days • Rushes from 1 machine to another • Significant increase in spending pattern <p>Irrational and Superstitious Behaviour</p> <ul style="list-style-type: none"> • Complains to staff about losing, or blames venue or machines for losing • Rituals or superstitious behaviours such as rubbing belly of machine or screen, talking to machine, spitting on machine, use of luck charms <p>Emotional Responses</p> <ul style="list-style-type: none"> • Shows signs of distress after gambling (looks sad/depressed, crying, holding head in hands, nervous/edgy, shaking, sweating) • Gets angry while gambling (kicking, hitting machines, swearing, grunting or groaning, playing roughly/aggressively) <p>Social Behaviour</p> <ul style="list-style-type: none"> • Stays on to gamble when friends leave venue • Is rude or impolite to venue staff • Becomes angry or stands over others if someone takes their favourite machine/spot • Avoids contact or conversation with others • Generally poor hygiene, or, significant decline in personal grooming or appearance over several days (body odours, dirty or unchanged clothes, messy greasy hair) • Conceals presence at venue (doesn't answer mobile phone, takes or makes calls outside venue, asks staff not to let others know they are there, people contact or visit venue looking for person) 	
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* Source: Thomas et al (2014) validation_study_invenue_problem_gambler_indicators.pdf

^ Source: Crown Responsible Gambling Code of Conduct, which states "These signs are adapted from Thomas, A. et al 2014, "Validation study on in-venue gambler indicators", Gambling Research Australia"

96.9 In the Foundation's opinion, best practice would require Crown to use those signs identified and validated by Thomas et al to assist and respond to people gambling on EGMs. In particular, it is the Foundation's opinion that Crown should use the clear time, betting, money and cash withdrawal signs that are used in venues as a basis for intervention, being:

96.9.1 3+ hours without a proper break;

96.9.2 2+ ATM/EFTPOS withdrawals;

96.9.3 >\$3 per spin most of the time; and

96.9.4 >\$300 in a session.

Shane Lucas

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Shane Peter Lucas

Date: 10 May 2021

APPENDIX A

FOUNDATION RESEARCH PAPERS

- Population studies
 - Study of gambling and health in Victoria (May 2020 see [below](#))
 - Victorian gambling study (3-year longitudinal study) (August 2014)
- Strategic research
 - Assessing gambling related harm in Victoria: a public health perspective (April 2016)
 - The social cost of gambling in Victoria (November 2017)
 - Problem gambling in people seeking treatment for mental illness (July 2017)
- Discussion papers
 - Hidden harm: Low-risk and moderate-risk gambling (July 2017)
 - Gen Bet: Has gambling gatecrashed our teens? (March 2017)
 - Responsible gambling: past, present and future (October 2016)

Recent Publications include:

- Victorian population gambling and health study 2018-2019 (May 2020)

This report details results from a large general population survey on gambling participation, gambling problems and gambling-related harm in the state of Victoria, Australia conducted between September 2018 and January 2019.
- Australian young women's gambling behaviours: A socio-cultural investigation of gambling attitudes, beliefs, and consumption intentions (April 2020)

The aim of the study was to explore the range of key determinants that may shape the gambling beliefs and behaviours of older adolescent (18–24 years old) and young adult (25–34 years old) women.
- Factors that shape the gambling attitudes and behaviours of older adults in Victoria (March 2020)

This study examined the gambling behaviours and attitudes of older adults in Victoria.

- Transitioning into and out of low-and moderate-risk gambling: predictors and profiles (March 2020)

This study investigated the characteristics of people who transition into, and out of, low- and moderate-risk gambling.

- The prevalence and correlates of gambling in secondary school students in Victoria, Australia, 2017 (October 2019)

This study explores attitudes, behaviour and exposure to gambling among secondary school students in Victoria.

ⁱ Hing, N., Russell, A., Nuske, E., & Gainsbury, S. (2015). The stigma of problem gambling: Causes, characteristics and consequences. *Victoria, Australia: Victorian Responsible Gambling Foundation.*

ⁱⁱ VCGLR 2018

ⁱⁱⁱ Whetton, S. O'Neil, M. Delfabbro, P. Sproston, K. Halim, S. Dey, T. Hanley, C. Kay, L. Kosturjak, A. Tran, K. Wood, A. (2019). *Evaluation of YourPlay Final Report.* Adelaide: South Australian Centre for Economic Studies.

^{iv} Whetton, S. O'Neil, M. Delfabbro, P. Sproston, K. Halim, S. Dey, T. Hanley, C. Kay, L. Kosturjak, A. Tran, K. Wood, A. (2019). *Evaluation of YourPlay Final Report.* Adelaide: South Australian Centre for Economic Studies.

^v Thomas, A. C., Delfabbro, P. H., & Armstrong, A. R. (2014). *Validation study of in-venue problem gambler indicators.* Victorian Government.