

From: Joshua Preston
Sent: Mon, 26 Aug 2019 21:43:28 +1000
To: [REDACTED]
Cc: Susan Cassinides;Michelle Fielding;Sonia Bauer;Melanie [REDACTED]
Subject: Sixth Casino Review - Submission re Recommendation 14 [CM-COMP.FID19130]
Attachments: 190820 Letter to VCGLR - Recommendation 14 - Additional Information.docx

Evening Rowan,

Thank you for your email and for the opportunity to provide this additional information. Please find below each of the queries, together with the further information/clarification requested.

Letter from Crown dated 29 June 2019

1. Page 2, third paragraph, first sentence. "The Strategic Plan was developed with a wide-ranging current state analysis as the foundation for setting the direction." Is 'state' in the context of 'Australian states?' or is it 'as it is today'. ie. 'current state of play?'

Further Information/Clarification:

- *I confirm that this reference is intended to mean "as it is today", i.e. the current state of play.*

2. Page 2, fifth paragraph, first sentence. Crown states that points (a) to (l) of the recommendation are addressed as either initiatives or actions in Appendix A. Did Crown prepare a table mapping points (a) to (l) to the initiatives or actions for reference? If so, may we have a copy to include as a table to present to the Commission as confirmation.

Further Information/Clarification:

- *Crown did conduct mapping between the recommendation points (a) to (l) to the initiatives and actions, and a table presenting this mapping is provided in **Attachment A**.*

Crown's Responsible Gaming Strategic Plan

3. Page 6 - RG cases: How this term defined? I note the increase in 2018 but even then, it is less than one case per day on average (200 over 365 days).

Further Information/Clarification:

- *The term "RG Case" is defined as an interaction between the RG Team and a Customer, in relation to a responsible gaming related matter. Examples of when these interactions would occur include:*
 - *A self exclusion process*
 - *Detected breaches of self exclusion orders (attempted or actual breaches)*
 - *Patrons displaying observable signs / extended play periods*
 - *Revocation process enquiries*
 - *Welfare checks on a patron*
- *Chart 2.2.3 shows that there was an average of approximately 200 interactions of this nature, per week (not per year).*

4. Page 7, first paragraph - The table is said to be "reflective of the challenges...." How?

Further Information/Clarification:

- *The underlying challenge associated with the implementation and use of player analytics is that it attempts to predict human behaviour. Accordingly, it relies heavily on the appropriateness of assumptions, and the accuracy and completeness of underlying gaming transactions (for carded players). Limited transactional information is available to use for uncarded players.*
 - *The table is reflective of the above challenges, by showing that:*
 - *Predictive modelling analysis is in place only in New Zealand and (as a trial) in the United Kingdom. It is not in place in the other jurisdictions.*
 - *Other player analytics are in place in other jurisdictions, but mostly for visit frequency and/or time, which are easier and more reliable metrics to capture and monitor.*
5. Appendix A, Page 21 – Reference to RG team. How does Crown define RG team? Is it only RGC staff and RGAs?

Further Information/Clarification:

- *The RG Team refers to all personnel included in the Responsible Gaming Team Structure diagram presented on page 3 of the Strategic Plan.*

Please do not hesitate to contact me if you require any further information with respect to the above.

Kind regards
Josh

Joshua Preston
Chief Legal Officer – Australian Resorts



[W crownresorts.com.au](http://www.crownresorts.com.au)

From: Rowan Harris [[mailto: \[REDACTED\]](#)]
Sent: Wednesday, 21 August 2019 12:47 PM
To: Susan Cassinides
Subject: FW: Sixth Casino Review - Submission re Recommendation 14

Hi Susan,

As discussed, please refer to the email below in light of Michelle's absence.

Thanks

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit
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From: Rowan Harris
Sent: Tuesday, 20 August 2019 5:14 PM
To: 'Michelle Fielding' <[REDACTED]>
Cc: Sonja Bauer <[REDACTED]>, Jason Cremona <[REDACTED]>, Steve Thurston <[REDACTED]>
Subject: Sixth Casino Review - Submission re Recommendation 14

Hi Michelle,

I refer to Crown's 29 June 2019 letter (Letter) and attached Responsible Gaming Strategic Plan 2018-2020 (Plan).

We have the following minor queries...

Letter

1. Page 2, third paragraph, first sentence. "The Strategic Plan was developed with a wide-ranging current state analysis as the foundation for setting the direction." Is 'state' in the context of 'Australian states?' or is it 'as it is today'. ie. 'current state of play?' Current state of play
2. Page 2, Fifth paragraph, first sentence. Crown states that points (a) to (l) of the recommendation are addressed as either initiatives or actions in Appendix A. Did Crown prepare a table mapping points (a) to (l) to the initiatives or actions for reference? If so, may we have a copy to include as a table to present to the Commission as confirmation. SG (LP has requested the mapping document from Sasha).

Plan

3. Page 6 - RG cases: How this this term defined? Combination of different nature of services relating to problem gambling.
I note the increase in 2018 but even then, it is less than one case per day on average. (200 over 365 days) Weekly average i.e. 200 a week on average.
4. Page 7, first paragraph - The table is said to be "reflective of the challenges...." How? Unsure of answer.

Appendix A

5. Page 21 – Reference to RG team. How does Crown define RG team? Is it only RGC staff and RGAs? Refer to the Responsible Gambling Strategic Plan 2018-2020 Responsible Gaming Team Structure.

Thanks

Rowan

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