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23 December 2019

Ms Catherine Myers
Chief Executive Officer
Victorian Commission for Gambling and Liquor Regulation
Level 3, 12 Shelley Street
RICHMOND VIC 3121

By Email

Dear Ms Myers

Sixth Review of the Casino Operator and Licence (Sixth Review) – Recommendation 6

I refer to Recommendation 6 of the Sixth Review and Crown Melbourne Limited's (Crown's) response dated 2 July 2018.

Recommendation 6 provides:

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 RGLO. However, this will only be effective if those staff have sufficient time aside from their gaming duties.

Crown's response dated 2 July 2018 to Recommendation 6 provided:

Recommendation accepted. Crown has already commenced the process of employing an additional five Responsible Gaming staff members. Additionally, there will be a review of training for gaming and other related staff.

In addressing the Recommendation, Crown completed a review of the resourcing of the Responsible Gaming department and determined to increase its staffing compliment from 7 to 12. Upon completing the resourcing review, Crown was of the view that this increase in resources adequately addressed the element of the Recommendation regarding having adequate staff available for intervention duties with patrons. However, to further support Crown's responsible gaming commitment, Crown also determined that, in our respectful view, the most appropriate and effective way to address the whole of the Recommendation was to enhance and refresh responsible gaming training, in terms of content and regularity of delivery, as well as increasing the number of gaming staff receiving advanced training. This additional training also supports the objective of this

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Recommendation by providing gaming staff with the skills and tools to identify and engage with patrons who may be experiencing issues with their gaming. If necessary, the gaming staff can then refer to the larger pool of Responsible Gaming Advisors.

Particular actions taken in responding to this Recommendation include as follows:

- 5 additional Responsible Gaming Advisors have been employed, increasing the total number of Responsible Gaming Advisors from 7 to 12. As full time employees, over 120 hours per week have been added to the number of hours available for Responsible Gaming Advisors to assist patrons. The full organisational chart of the Responsible Gaming department is provided in **Appendix A**, which provides an overview of all dedicated resources allocated to responsible gaming.
- Training provided to operational staff has been carefully considered and reviewed in the context of this Recommendation. Detailed below is an overview of steps taken, and being taken, regarding training:

 - To further enhance the culture of responsible gaming and harm minimisation, and to build capacity for the operational teams, Crown will commence delivering advanced level 'Senior Manager Training' to the Table Games' Area Managers, some 330 additional staff. The training, which is designed to assist relevant managers develop a deeper understanding of responsible gaming and their role in supporting staff in their responsibilities, has historically only been offered in Table Games at the level of Assistant Casino Manager and above. The additional, advanced training will assist in ensuring Table Games Area Managers are well equipped with additional competencies and skills to deliver Crown's responsible gaming services and programs. This adds to the existing training of the gaming teams as described in **Appendix B**.
 - The above mentioned resource review did not identify the need to change the duties of Area Managers to formally allocate more time to responsible gaming matters (the addition of 5 extra Responsible Gaming Advisors was assessed as sufficient). In our respectful view, the enhanced responsible gaming training and awareness will lead to a broader set of staff skilled in identifying responsible gaming issues that can lead to direct engagement between the Area Managers and the patrons, and that the current role of an Area Manager provides sufficient scope for these operational employees to apply the knowledge and skills gained in the training sessions to patrons with whom they currently interact.
 - Outcomes commonly associated with additional training and focus, include enhanced reporting of events and greater engagement with the culture of responsible gaming, for those staff receiving the training and their direct reports. The large number of staff being trained (330 Area Managers) is expected to contribute greatly to the objectives of Crown's responsible gaming program.
 - There is currently a working group comprised of representatives from the Victorian Commission for Gaming and Liquor Regulation (**VCGLR**), the Victorian Responsible Gambling Foundation and Crown, reviewing and updating training for the Gaming Machines Department operational Casino Special Employees, pursuant to s 58B of the *Casino Control Act 1991 (Vic)*.
 - Crown notes that the VCGLR Commissioners approved the training modules at the Commission meeting of 22 August 2019, with the working group now finalising content.

- This training incorporates significant additional competencies that must be met by Gaming Machines staff in order to deliver on Crown's responsible gaming culture and harm minimisation. The training will significantly increase the responsible gaming capacity of Gaming Machines' staff - specifically the Customer Service Attendants and Managers.
 - The update and added competencies of the training support the objective of the Recommendation, by providing tools for the assessments of patrons who may be experiencing difficulties with their gaming behaviours, without the need to contact a Responsible Gaming Advisor.
- Supporting the objective of the Recommendation, we also note the following:
- Responsible Gaming uses a variety of ways to communicate refreshed messages with employees and to keep focus on responsible gaming, which includes periodic content in a weekly information circular entitled 'Frontline', back-of-house static communications and Crown's bi-annual staff magazine called 'Crown Chat'.
 - Additionally, Crown has introduced pocket sized cards for all employees, to be used as a quick reference guide and training reminder, containing information in relation to the location and operating hours of the Responsible Gaming Centre; availability of the Responsible Gambling Code of Conduct (**Code**); the referral mode to Responsible Gaming and the Observable Signs as detailed in the Code. The reference cards are distributed to all new staff at induction training and are available and distributed to existing staff during ongoing training and at key back of house locations (such as Staff Entry, Wardrobe, break areas, briefing and muster rooms and the staff restaurant). The reference cards are a useful guide and reminder tool and are referenced by Responsible Gaming Advisors when attending the quarterly briefing and muster information sessions. See below for a depiction of this Pocket Guide.

<p>RESPONSIBLE GAMING INFORMATION FOR EMPLOYEES</p> <p> responsiblegaming AWARENESS, ASSISTANCE, SUPPORT Gambler's/Gambling Help 1800 858 858 Responsible Gaming Centre 1800 801 098</p> <p> CROWN</p>	<p> Assistance from the Responsible Gaming Centre (RGC) is available 24/7 on 1800 801 098 or ext. 5766</p> <p> The Responsible Gambling Code of Conduct is available from the RGC, all casino entrances, Crown Rewards desks, Cashier desks and the website</p> <p> The RGC is located on Level B1, below the Main Food Court (above the Poker Room)</p> <p> If someone is displaying potential signs of problem gambling, contact the RGC directly or speak to your manager</p>
<p>OBSERVABLE SIGNS</p> <p>Self-disclosure – self-disclosure of a problem with gaming or request to self-exclude</p> <p>Family concerns – requests for assistance from family and/or friends concerned about an individual's gaming behaviour</p> <p>Unattended children – children left unattended while a parent/guardian gambles</p> <p>Aggression – gets angry while gaming or shows signs of distress during or after gaming</p> <p>Excessive time – often gambles for long periods without a break</p>	<p>Borrowing money – witnessed or heard that a customer was trying to borrow money for gaming</p> <p>Changes in appearance – significant decline in appearance</p> <p>Conflict – observed conflict over gaming between family or friends</p> <p>Unrealistic – unrealistic remarks about gaming</p> <p>Complaints/Blaming – complains to staff about losing or blames the casino or gaming product for losing</p> <p>Secretive – secretive or embarrassed about being at the casino or stays on to gamble when friends leave the venue</p> <p>Avoidance – gambles without reacting to what is going on around them and avoids contact or conversation with others</p> <p>ATM – frequent visits to the ATM</p>

Based on the information provided above, Crown is of the view that Recommendation 6 has been appropriately addressed.

Please do not hesitate to contact me or Joshua Preston if you have any queries.

Yours sincerely



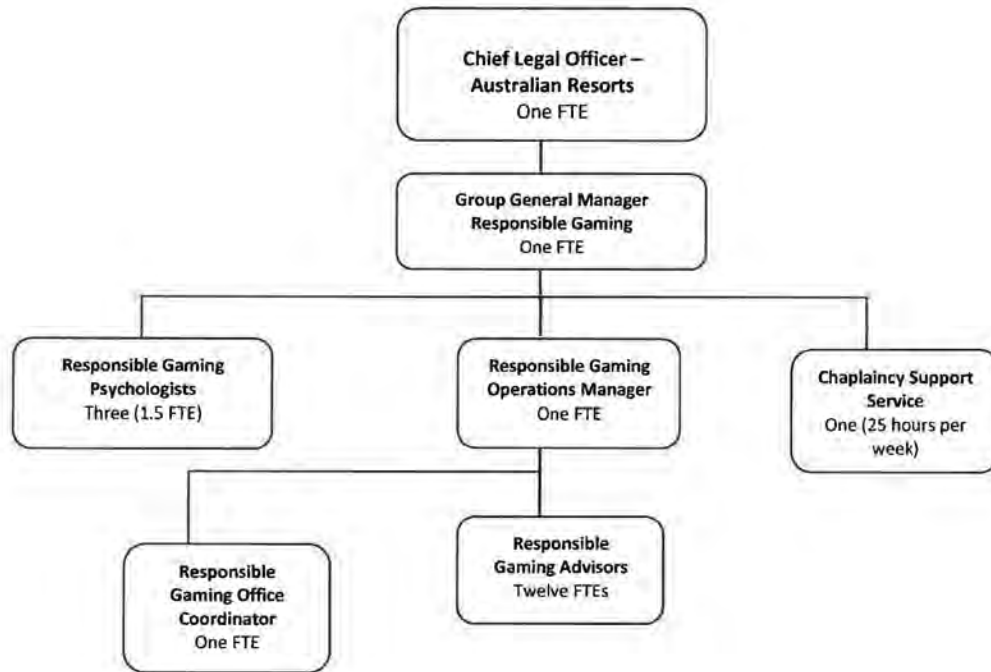
Barry Felstead
Chief Executive Officer – Australian Resorts

cc: Rowan Harris

Encl.

Appendix A

Crown Melbourne Responsible Gaming Department Organisational Structure as at December 2019



FTE Full Time Equivalent

Appendix B



Responsible Gaming Training and Information Sessions Gaming Employees – as at December 2019

No.	Session	Audience	Detail	Frequency	Delivery Method	Assessment	Delivered by
1	Responsible Service of Gaming (RSG) online ¹	All Gaming Machines (GM) staff All Table games (TG) staff	Victorian Commission for Gambling and Liquor Regulation (VCGLR) Approved	Every Two Years	Online	Individual assessment Online questions 100% pass required	Crown College
2	Corporate Induction ²	All GM staff All TG staff	Crown Melbourne (Crown) Developed	Induction	Facilitator Led	Group Assessment	Responsible Gaming
3	GM Induction ³ This will be retitled following VCGLR approval to: <i>Gaming Machines Additional</i>	Customer Service Attendants (CSAs)	Crown Developed VCGLR Approved	Initial Training	Facilitator Led	Individual Assessment and Group Assessment	Responsible Gaming

¹ RSG online is the VCGLR approved training, delivered by Crown upon employment and as a refresher every two years. Topics include Understanding the Nature of Problem Gambling; Providing Information; Interacting with Customers and the Community; Utilising Self-Exclusion Provisions; Creating Physical Environments; Managing Financial Transactions; Developing and Implementing Advertising and Promotional Strategies; Responsible Gaming Centre (RGC) Programs and Services; The Responsible Gambling Code of Conduct (Code); Self Care; the Crown Referral Model.

² At induction, all new staff are instructed on Crown's responsible gaming practices, available support including the RGC, the RGC's role, programs and services and self-care. There is a focus on the observable signs a person may display if they are experiencing difficulties with their gambling behaviours. They are also provided with a copy of the Code.

³ A specially developed Induction for all new CSAs that provides an additional focus on responsible gaming for Gaming Machines employees at Crown, the CSA's obligations and in-depth discussion of observable signs and the Crown Referral Model. Activities include:

- A visit to the RGC or RG to visit the GM Training Room (dependant on size of Induction group);
- Face to face facilitation – more role specific than Corporate Induction, about observable signs and how to follow up with an AM;
- Video; and
- Trainees complete a three page questionnaire with a facilitator, discussing all answers in a group setting.

No.	Session	Audience	Detail	Frequency	Delivery Method	Assessment	Delivered by
	<i>Focus</i>						
4	<i>RSG Training Refresher</i> ⁴ This will be introduced following VCGLR approval	All GM staff	Crown Developed VCGLR Approved	Every Two Years	Facilitator Led	Group assessment	Responsible Gaming
5	Senior Manager ⁵ This will be retitled following VCGLR approval to: <i>RSG for Senior Managers</i>	GM Area Manager (AM) (and above) TG Assistant Casino Manager (and above) Note: Crown will now commence training from the Area Manager (AM) level (and above)	Crown Developed VCGLR Approved	Every Two Years	Facilitator Led	Group Assessment	Responsible Gaming
6	Compliance – Your Obligations ⁶	All GM staff	Crown Developed	Annually	Online	Individual Assessment	Gaming Machines
7	'Know Your RG' (Responsible Gaming) ⁷	All Operational GM staff	Crown Developed	Twice per Year	Rolling presentations and	No Assessment - Interactive	Responsible Gaming

⁴This training will be introduced following VCGLR approval, and will be completed by all staff who perform any of the functions of a special employee in relation to gaming machines. At the end of this session, participants will be able to demonstrate how to respond to customers displaying observable signs (low and high level), their responsibilities in relation to documentation and escalation to relevant manager/RGA.

⁵The Senior Manager Responsible Gaming Training Program is designed to assist relevant managers develop a deeper understanding of responsible gaming and their role in supporting staff in understanding what their responsibilities are. The training includes information with regard to the Code, the RGC and its programs and services; and observable signs.

⁶All GM employees complete an online module to increase their knowledge in relation to our obligations in the key areas of RG. Results from this module will highlight key learning opportunities for the BU and individuals (role/position).

NO.	Session	Audience	Detail	Frequency	Delivery Method	Assessment	Delivered by
					item on briefings		
8	Briefings & Musters ⁸	All Operational GM staff AMs, Assistant Casino Managers and Casino Managers	Crown Developed	Quarterly	Facilitator Led	No Assessment - Interactive	Responsible Gaming
9	Interstate/International Managers ⁹	All New GM and TG Interstate and International Managers	Crown Developed	Initial Training	Facilitator Led	No Assessment - Interactive	Responsible Gaming
10	Certificate III in Hospitality (Table Games) SIT30616 ¹⁰	Dealers	Crown Developed SITHGAM001 'Provide Responsible	Initial Training	Facilitator Led	RSG Online Assessment and written questions – 100%	Responsible Gaming and Crown College

⁷ An awareness campaign for GM employees – 'Know Your RG'. This campaign entails visits by Responsible Gaming Advisors (RGA) to GM employee briefings and focuses on responsible gaming programs and services and observable signs.

⁸ Every three months, an RGA will attend employee briefings and deliver key RG reinforcement messages, as well as providing the opportunity for employees to interact and ask questions and check for understanding.

⁹ All new Interstate and International Managers attend face to face Responsible Gaming Additional training specific to their role.

¹⁰ SITHGAM001 'Provide Responsible Gambling Services' accredited unit of competency, is completed in the first two weeks of training. This includes the RSG online module and facilitator led training and discussion. Dealers are provided with information on responsible gaming practices, Responsible Gaming Centre location, programs and services and the role of the RGAs. Session outcomes:

- To identify problem gambling observable signs;
- To report problem gambling observable signs to appropriate staff;
- To understand the Self-Exclusion process;
- To recognise the responsibilities all staff have to maintain responsible service of gambling;
- To know what responsible gambling features can be found at Crown Melbourne;
- To provide responsible gambling information to customers;
- To understand the need for confidentiality when dealing with responsible gambling; and
- To know where to locate responsible gambling information.

No.	Session	Audience	Detail	Frequency	Delivery Method	Assessment	Delivered by
			Gambling Services' (developed using Australian Skills Quality Authority criteria)			competency required Role Play Assessment – Observation	
11	Learning Block 4 Training ¹¹	Dealers completing Certificate III in Hospitality (Table Games)	Crown Developed	Between 9 – 12 months of service	Facilitator Led Discussion	No Assessment - Interactive	Responsible Gaming

¹¹ Refresher, covering topics such as RGC location, opening hours, staff and services, observable signs and responsibilities of all staff to escalate issues where necessary. The final part is a discussion with the dealers on incidents/outcomes that they were involved in – for e.g. A Self-Exclusion or WOL patron being removed from their table, withholding of winnings etc.