

To: Michelle Fielding [REDACTED]
Cc: Sonia Bauer [REDACTED]; Jason Cremona [REDACTED]; Steve Thurston [REDACTED]
From: Rowan Harris [/O=VCGLR/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5C51AE9757DA4279B9540ABD945A2353-ROWAN HARRIS]
Sent: Mon 2/24/2020 2:06:18 PM (UTC+11:00)
Subject: Sixth Casino Review - Recommendation 6 (follow up enquiries)
[191223 Letter to the VCGLR - Recommendation 6.pdf](#)
[Recommendation 6 follow up queries Appendix A.PDF](#)

Hi Michelle,

Thank you for your responses. Very helpful indeed.

I just have some minor follow up enquiries/requests following my analysis:

1. As offered, please provide the roster for the month when there were seven RGAs and confirm their total weekly number of RGA work hours (i.e. 7 RGAs x 40 hours per week = 280 hours)
2. From the attached roster (Appendix A) – a/ what does 'AD - 7am' and 'AD - 12pm' mean? b/ Does '8-5' mean 8am-5pm? i.e. RGA3 works an eight hour shift from 8am to 5pm; and c/ Please confirm the other RGAs work a combination of day (D) and night (N) shifts (i.e. two 8 hours shifts x 2, and two 12 hours shifts x 2 = 40 hours)
3. With the hiring of five RGAs, hasn't the total weekly hours increased by over 200 hours (i.e. 5 x 40), not the 120 hours referred to on page 2 of the submission? (i.e. 7 RGAs x 40 hours per week = 280 hours. 12 RGAs x 40 hours per week = 480. Difference 200 hours).
4. I refer to 1/ h. of the email request. Could you please provide a further month of 'Number of weekly patrons (one month after addition of 5 RGAs)' immediately after the one provided (i.e. 26 November 2018 - ? December 2019). Also, referring to the table: '29 October 2018 – 25 November 2018', there is a footnote '1' alongside '1,518'. Is it relevant for VCGLR purposes?

Happy to discuss. I would appreciate a response at your earliest convenience for preparation of the Commission paper. Would COB Wednesday 26 February suit?

Regards

Rowan

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit

Victorian Commission for Gambling and Liquor Regulation

Level 3, 12 Shelley Street, Richmond Vic 3121 Australia

d. [REDACTED] m. [REDACTED]

e. [REDACTED] www.vcglr.vic.gov.au

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From: Michelle Fielding [REDACTED]

Sent: Thursday, 20 February 2020 12:34 PM

To: Rowan Harris

Cc: Sonja Bauer ; Jason Cremona ; Steve Thurston

Subject: HPE CM: FW: Sixth Casino Review - Recommendation 6 (enquiries) [CM-COMP.FID19042]

Hi Rowan

As requested, see below responses to your further queries and please let me know if you have any concerns.

Regards

Michelle Fielding | Group General Manager – Regulatory and Compliance | Crown Resorts Limited

t: [REDACTED] | m: [REDACTED] | e: [REDACTED] | w: www.crownmelbourne.com.au

From: Rowan Harris [REDACTED]

Sent: Friday, 7 February 2020 1:21 PM

To: Michelle Fielding

Cc: Sonja Bauer; Jason Cremona; Steve Thurston

Subject: Sixth Casino Review - Recommendation 6 (enquiries)

Hi Michelle,

Thank you for Crown's submission in relation to recommendation 6 (attached).

As discussed, the VCGLR has the following enquiries:

1. I refer to the first arrow point on page 2 of the submission. Crown advises that “5 additional Responsible Gaming Officers have been employed “ and “over 120 hours per week have been added to the number of hours available for Responsible Gaming Advisors to assist patrons”.

a. What was the total weekly number of RGA work hours available to responsible gambling and intervention with patrons for the month before employment of the 5 additional Responsible Gaming Advisors (RGAs)?

It took approximately six months to hire and train the additional five Responsible Gaming Advisors (RGAs), therefore, in order to provide the figures for the month prior to the additional hires for comparison purposes, we provide the data for the month of May 2018 (an employee had departed the team in April 2018 and so in May 2018 there were six RGAs on this roster. Please advise if you would like the roster for when there were seven RGAs). The total weekly number of RGA work hours available to Responsible Gaming, prior to hiring the additional 5 RGAs in May 2018, was 240. This number was only subject to change according to leave, however, at all times there was at least 1 RGA on shift.

b. How many standard hours per week does each RGA work?

RGAs work 40 hours per week. This is averaged over an eight week rotating roster (320 hours over eight weeks).

c. Please provide a copy of the RGA roster one month before and one month after employment of the additional five RGAs.

Provided at Appendix A is a copy of the roster one month (four weeks) before (30 April 2018– 27 May 2018) and one month (four weeks) after (29 October 2018 – 25 November 2018) the employment and training of the additional five RGAs.

d. How have the five additional RGAs been utilized? Are their roles the same as the other RGAs? If not, how are they different?

The additional five RGAs perform the same tasks as the others, however have also been utilised to undertake the additional tasks required by the Sixth Review, including:

- I. Analyst and innovation work;
- II. Play Period and Crown Model work and alerts; and
- III. Self Exclusion breach and attempted breach patron interaction/support, due to Facial Recognition Technology (FRT).

e. How many RGAs are on duty at any one time? How has the number of RGAs on duty increased as a result of the additional five RGAs? If so, please provide details. Is there more than one RGA on duty in the late evening and early morning?

f. Does the RGA roster allow for the number of RGAs on duty to be adjusted/increased for 'peak' periods?

g. Is there always at least one RGA on site 24/7?

In respect of e), h) & g) - RGAs are rostered in teams and work eight and 12 hour shifts (0700hrs and 1900hrs start times). Dependent on planned and personal leave, a minimum of one, with up to three RGAs are rostered and working per shift (this includes late evening and early morning shifts). Prior to the appointment of the additional RGAs, one to two RGAs were rostered per shift. The employment of the additional RGAs allows for up to three RGAs per shift. Rostering does not account for peak or non-peak business times, for example, Friday and Saturday nights, as these generally do not vary from other times in the week in relation to volumes of responsible gaming contacts. At times, due to planned or unplanned leave, the roster may change to allow for coverage across the day and night shifts, however, at all times there is at least 1 RGA on shift.

h. Please provide analysis of the change in the number of weekly patron interventions as a result of the additional five RGAs. The analysis will show one month before and one month after the addition of the five RGAs (ie. over 120 hours).

Please find below the patron contacts one month before the addition of the five RGAs and one month after the addition of the five RGAs (this information is drawn from RGA contacts in the Responsible Gambling Register for the reporting periods and is audited by the on-site Inspectorate).

Number of weekly patron interventions (one month before addition of 5 RGAs)				
30 April 2018 - 27 May 2018				
Week 1	Week 2	Week 3	Week 4	Total
165	266	319	347	1097

Number of weekly patron interventions (one month after addition of 5 RGAs)				
29 October 2018 - 25 November 2018				

Week 1	Week 2	Week 3	Week 4	Total
444	437	339	298	1518 ¹

The additional tasks that were required and implemented following the Sixth Review, in conjunction with additional RGA work hours, have resulted in an uplift in patron contacts by 38.38%.

2. I refer to the first and second bullet points on the same page. In relation to training provided to operational staff – “Crown will commence delivering advanced level ‘Senior Manager Training’ to the Table Games’ Area Managers, some 330 additional staff” and “The abovementioned resource review did not identify the need to change the duties of Area Managers to formally allocate more time to responsible gambling matters (the addition of 5 extra Responsible Gaming Advisors was assessed as sufficient”.

a. When does the delivery of advanced level ‘Senior Manager Training’ to the Table Games’ Area Managers commence and how long will it take to complete this training?

This training commences in March 2020 and is anticipated to take up to twelve months to complete, allowing for rostering, shift times, leave etc.

b. Will the Table Games’ Area Managers’ responsibilities change as a result of their additional advanced training in terms of pro-actively identifying potential problem gambling issues and lead to engaging directly with a patron at risk, without the need to contact an RGA? Will these interventions be recorded in a register? If so, please provide details thus far. Or is it just refresher training without any change in their RG identification and patron engagement responsibilities?

In our letter addressing Recommendation 6, page 2 of 4, Crown wrote:

‘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 the 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.’

Area Manager responsibilities have always included the identification of potential problem gambling behaviours, as well as potential interaction with a patron at risk, when warranted and appropriate. Area Managers will continue to advise RGAs or their manager of any potential problem gambling behaviours and interactions, for recording in the Responsible Gambling Register and future patron management.

c. For clarity, what is Crown’s policy for player intervention by gaming staff (tables and gaming machines)? Does player intervention only rest with RGAs and Table Games’ Area Managers? (I refer to clause 2.2 of the RSG Corporate Policy Statement – reviewed May 2017)

Player intervention does not only rest with the RGAs and Table Games Area Managers. Line 5 of Appendix B of Crown’s submission for Recommendation 6 reflects that the Senior Manager training is already undertaken by Gaming Machines Area Managers. Additionally, page 2 of the submission, at dot point 2 refers to this level of training leading ‘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 roles 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.’

3. The Sixth Casino Review report observed “The VCGLR is concerned that with the recent increase in detections of excluded persons, RGLOs will be required to spend a disproportionate amount of time on managing excluded persons, rather than assisting Crown Melbourne to fulfil its responsible gambling obligations” and “Security staff, rather than RGLOs, could have the primary responsibility of speaking with excluded persons detected in the casino and removing them without the involvement of RGLOs”. This may have changed with the introduction of FRT.

- However, are RGAs spending less time on managing persons in breach of exclusion orders, rather assisting Crown to fulfill its responsible gambling obligations. Has this led to an increase in the number of hours actually available to responsible gambling and intervention with patrons? Please provide any evidence.

Crown considers engaging, where possible, with a person who has self excluded and breaches or attempts to breach, an important part of assisting customers in their commitment to managing their gaming behaviours. The advent of FRT has shown that whilst there was an initial increase in detection, the existence of FRT is also acting as a good deterrent, and therefore the numbers are continuing to level off. These interactions continue to be an important component of Crown’s responsible gaming commitments.

Please note the graph (calendar year) in Appendix B to illustrate the volumes and levelling off.

4. Has Crown considered utilizing other staff (such as gaming machine attendants) to proactively interact with patrons where they observe possible signs of harm from gambling, rather than to rely on RGAs to have these interactions? Are interventions recorded on the Responsible Gambling Register. If so, please provide details.

Yes, all Crown gaming floor staff are trained in observable signs and can interact as required, this includes (for example) Security staff, Cage staff, Gaming Machines staff, Table Games staff, etc. (the gaming staff training is specified in Appendix B of our Recommendation 6 submission). Interactions are referred to the RGAs and are recorded in the Responsible Gambling Register, which is audited by the on-site Inspectorate.

Crown's submission addressing Recommendation 6, page 3, provides:

'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 VCGLR requests that Crown provide its responses by COB Friday 21 February 2020. This information is required to assist with preparation of the Commission paper on recommendation 6.

Happy to discuss.

Regards

Rowan

Rowan Harris | Principal Major Licence Officer | Licence Management and Audit
Victorian Commission for Gambling and Liquor Regulation

Level 3, 12 Shelley Street, Richmond Vic 3121 Australia

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