



RESPONSIBLE GAMING COMMITTEE

Meeting of the Committee

Tuesday, 11 February 2020 at 11.00am

Chairman's Office Boardroom



Responsible Gaming Committee

Meeting of the Committee to be held on Tuesday, 11 February 2020
at Level 3, Crown Towers, 8 Whiteman Street, Southbank, Victoria at 11.00am

Attendees

<i>Committee:</i>	John Horvath (Chair)
	John Alexander
	Toni Korsanos
	Mary Manos (Secretary)
<i>By Invitation:</i>	Ken Barton (Crown Resorts Limited)
	Sonja Bauer (Crown Melbourne/Australian Resorts)
	Barry Felstead (CEO – Australian Resorts)
	Lauren Harris (Crown Resorts Limited)
	Kevin Hong (Senior Manager – Strategy)
	Josh Preston (CLO – Australian Resorts)
	David Skene (Betfair)
	Melanie Strelein (Crown Perth)

AGENDA

1. [Minutes of Committee Meeting held on 4 December 2019](#)
2. [Matters Arising](#)
3. [Crown Perth Initiatives](#)
4. [Betfair Responsible Gaming Report](#)
5. **Australian Resorts**
 - 5.1. [Australian Resorts Responsible Gaming Report](#)
 - 5.2. [Crown Melbourne Responsible Gaming Statistics](#)
6. **Crown Melbourne Licence Review**
 - 6.1. [Status Table](#)
 - 6.2. [Response to Recommendation 6](#)
 - 6.3. [Response to Recommendations 7 and 8](#)

7. Gaming Environment Scan

8. Other Business

8.1. Review of Committee Charter

8.2. Future Meetings



AGENDA ITEM 1:
Minutes of Meeting held on 4 December 2019



Responsible Gaming Committee

Minutes of a Meeting of the Committee held on Wednesday, 4 December 2019
at Level 3, Crown Towers, 8 Whiteman Street, Southbank, Victoria at 11.15am

Members Present:

John Horvath (Chair)
John Alexander
Toni Korsanos

Mary Manos (Secretary)

By Invitation:

Ken Barton (Crown Resorts Limited)
Sonja Bauer (Group GM Responsible Gaming – Australian Resorts)
(by telephone)
Barry Felstead (CEO – Australian Resorts)
Lauren Harris (Crown Resorts Limited)
Leon Pillai (RG Operations Manager)
Josh Preston (CLO – Australian Resorts)
David Skene (Betfair)
Melanie Strelein (Crown Perth) (by telephone)

Apologies:

Nil

BUSINESS

**Minutes of Meeting held on 9
October 2019:**

It was **RESOLVED** that the Minutes of the Responsible Gaming
Committee Meeting held on 9 October 2019 be approved.

Matters Arising:

The Matters Arising paper was taken as read.

It was noted that there were no matters arising from the previous
meeting which remained outstanding.

Betfair Responsible Gaming Report: The Betfair Responsible Gaming Report was taken as read.

Amongst other matters, David Skene noted the following:

- Betfair participated in a research project undertaken by Sally Gainsbury at the Gambling Treatment & Research Clinic which involved sending different 'deposit limit' messages to selected groups of customers, and assessing which messages were most effective by monitoring wagering activity over the following 90 days.
- Betfair representatives recently met with the Australian Media and Communications Authority to report known illegal offshore gambling websites which ACMA intends to block through Australian internet service providers.
- Betfair representatives recently met with Licensing NT to discuss a number of matters, including the Northern Territory inducement laws.
- Betfair heavily promoted its Responsible Gambling webpage during the 2019 Spring Racing Carnival and noticed an increase in the number of Responsible Gambling webpage views.

The Committee discussed the above matters, including the research project undertaken by Sally Gainsbury and the possible methods of communication with customers.

David Skene noted that he would consider whether communications with customers could occur by way of SMS.

It was **RESOLVED** that the Betfair Responsible Gaming paper be noted.

Australian Resorts:

Australian Resorts Responsible Gaming Report:

The Australian Resorts Responsible Gaming Report was taken as read.

Josh Preston spoke to the Australian Resorts Responsible Gaming Report noting, among other matters, that:

- Recommendations 6, 7 and 8 of the Section 25 Review Recommendations were due to be submitted by 1 January 2020.
- A meeting with the Advisory Panel would be scheduled with management in mid-January 2020 to review the Crown Resorts Responsible Gaming Framework and Strategy.
- The Crown Model Trial Report has been completed and has been provided to an external expert for review and will be presented to the Committee at a future meeting.
- The events held for Gambling Harm Awareness Week at Crown Melbourne and Responsible Gambling Awareness Week at Crown Perth were successful.

- The Company had lodged a complaint with the Australian Press Council in relation to the Royce Millar article published in The Age regarding self-excluded patron, Stuart McDonald, noting that both Mr Millar and Mr McDonald had committed offences under the Crimes Act and the Casino Control Act respectively. In addition, a brief was being prepared for submission to the police regarding the offences. It was also noted that Mr McDonald was not stopped by security/surveillance as he accessed the property during a shift change, however, additional processes had been implemented to address this.

In relation to Deakin University's *GamblingLess: Curb Your Urge* app, Toni Korsanos requested that management pursue discussions with Deakin University to better understand the proposal and potential for the Company to provide support.

It was **RESOLVED** that the Australian Resorts Responsible Gaming Report be noted.

Crown Melbourne Responsible Gaming Statistics:

The Crown Melbourne Responsible Gaming Statistics Commentary paper was taken as read.

The Committee noted the Self Exclusion, Revocation and Unattended Children Statistics as well as the Harm Minimisation Overview and Exclusion Related Events Reports.

The Committee discussed the unattended children statistics, particularly at Crown Perth noting the split between gaming and non-gaming incidents.

It was **RESOLVED** that the Responsible Gaming Statistics be noted.

Crown Resorts Responsible Gaming Report:

The Crown Aspinalls and Aspers Responsible Gaming Reports were taken as read

Mary Manos advised the Committee that these reports would be refined to separate out the gaming environment scan matters from the business matters.

It was **RESOLVED** that the Crown Resorts Responsible Gaming Reports be noted.

Crown Melbourne Licence Review Update:

The Committee noted the progress made against each responsible gaming recommendation in the Crown Melbourne Licence Review Update paper.

The Committee thanked Josh Preston and his team for their efforts progressing the Recommendations.

It was **RESOLVED** that the Crown Melbourne Licence Review Update be noted.

Gaming Environment Scan:

The Gaming Environment Scan paper was taken as read.

It was **RESOLVED** that the Gaming Environment Scan be noted.

Future Meetings:

The future meeting dates were noted.

Closure:

There being no further business, the meeting was declared closed at 11.43am.

Signed

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Chair
John Horvath

DRAFT



AGENDA ITEM 2:
Matters Arising



Responsible Gaming Committee

Memorandum

To: Responsible Gaming Committee

From: Mary Manos

Date: 7 February 2020

Subject: **Matters Arising**

Dear Committee Members

At the last meeting of the Committee, the Committee requested that, in relation to Deakin University's *GamblingLess: Curb Your Urge* app, management pursue discussions with Deakin University to better understand the proposal and potential for Crown to provide support.

The Group General Manager Responsible Gaming pursued discussions with the Researcher as to whether there was an opportunity for Crown to provide support. A further discussion is to be held with the Associate Professor supervising the research project.

Kind regards

Mary Manos
General Counsel & Company Secretary



AGENDA ITEM 3:
Crown Perth Initiatives



Responsible Gaming Committee

Memorandum

To: Responsible Gaming Committee and Risk Management Committee

From: Joshua Preston / Barry Felstead

Date: 7 February 2020

Subject: **Crown Perth - Debit Card Chip Facility**
SUBJECT TO LEGAL PROFESSIONAL PRIVILEGE

Dear Committee Members,

1. Executive Summary

In early 2019, Crown Perth sought approval from the Gaming and Wagering Commission of WA (**Commission**) to permit the use of cashless forms of payment (debit only) in a gaming environment, in order to address the significant shift in consumers carrying less cash, and relying more on cashless payment systems such as EFTPOS.

The Commission granted full approval to Crown Perth for customers to use EFTPOS (including contactless methods using debit payment only, not credit) from designated areas within the casino, including ticket redemption terminals and gaming tables.

As part of its approval, the Commission imposed the following regulatory restrictions to the purchase of chips at a gaming table using EFTPOS (debit only):

- A maximum withdrawal limit of \$400 per transaction;
- The daily cash withdrawal limit being applied, as permitted by the customers financial institution (this is typically \$1,000-\$2,000 per day); and
- A post implementation report to be provided to the Commission, for the first 3 months of operation.

The proposed initial roll-out date is 30 March 2020.

The focus of this paper is to highlight the work undertaken to date for the implementation of EFTPOS on gaming tables (**Debit Card Chip Facility**), and to seek endorsement from the Responsible Gaming Committee and the Crown Resorts Board to implement the proposed solution.

2. Key Risk Considerations

A risk assessment has been undertaken, in order to identify and assess potential business risks associated with the Debit Card Chip Facility, and determine the most appropriate strategies to manage those risks. The risks identified concern the following areas:

- Responsible gaming;
- Reputation and media;
- Customer preference for the use of the technology in this manner;
- Operational impacts;
- Fraud; and
- Financial feasibility.

There is limited information and research which exists in relation to this particular proposition. We are aware of similar facilities being in use in a small number of tribal casinos in the United States, and of a field trial commencing on two tables at Red Rock Resort in March 2019.

To ensure Crown Perth can appropriately assess the operation of the Debit Card Chip Facility, and ensure controls are effective to manage the identified risks, a phased implementation approach has been designed as follows:

- Phase 1 - Technical Trial: involving 1 gaming table for one week, 3 additional gaming tables for a second week (main gaming floor only).
- Phase 2 - Operational Trial: Involving a total of 27 gaming tables for 13 weeks (approximately 10% of Crown Perth's total gaming tables) (main gaming floor only).
- Phase 3 - Full Implementation: to be determined based on the outcomes of Phase 2.

As an additional risk mitigation strategy, Crown Perth engaged Professor Alexander Blaszczyński (a member of Crown Melbourne's recently formed Responsible Gaming Advisory Panel), under Legal Professional Privilege, to provide commentary and advice on the proposal, and in particular recommend any additional measures as part of the implementation of Phase 1 and 2 to further manage the risk of responsible gaming issues.

A key recommendation made in the report, is for Crown to consider implementing a lower daily limit, commensurate with ATM withdrawal limits in other venues/jurisdictions. Based on this, Crown has determined to implement a \$500 daily limit in non-premium gaming areas, for a period of at least 6 months. Professor Blaszczyński's report is included as **Appendix B** and further detail regarding Crown's response to the report is provided below.

Detailed in the sections below and in **Appendix A** are additional controls proposed to be implemented during Phase 1 and 2. These controls are expected to reduce the risk of problem gaming incidents in relation to the use of the Debit Card Chip Facility, during Phase 1 and 2, to a **MODERATE** level. These controls will be assessed further at the conclusion of Phase 2, to determine the suitability of the controls for Phase 3.

There remains an overarching reputational risk that, irrespective of the adequacy of responsible gaming controls, the public may criticise Crown's actions due to Crown providing customers with easier and faster access to gaming chips while at a gaming table. Ultimately, this may result in complaints, or

adverse media coverage at either a State or, in the current environment and in light of the ILGA and other inquiries, national level.

On this basis, the risk of adverse media is still considered **HIGH** on a residual basis. Crown Resorts Corporate Affairs has developed a media response plan (included in **Appendix C**), which references the following:

- The strength of Crown Perth's responsible gaming framework, in addition to further specific face to face responsible gaming training provided to gaming staff with respect to the Debit Card Chip Facility;
- The phased and conservative approach being undertaken by Crown Perth in implementing the Debit Card Chip Facility (including no marketing, advertising or branding of the facility during Phases 1 and 2);
- The increasing shift towards a cashless society; and
- The ability for individuals to access funds in other associated industries in a much less restricted manner. For example, credit cards can be used for online gaming and wagering, and EFTPOS facilities without transaction limits can be used in licensed TAB venues in Western Australia.

The following additional strategies have been/will be implemented to further manage this risk:

- All work associated with this project to date, has been done on a confidential basis with a restricted number of staff involved.
- Stakeholders will be appropriately managed throughout the project. For example, the Commission will be kept informed throughout the various stages of implementation.
- As part of the face to face training which will be provided to gaming staff prior to the commencement of Phase 1, staff will be briefed on the shift towards a cashless society and that the Debit Card Chip Facility is being implemented in response to this. Staff will also be provided with a Q&A reference as part of their training. **Appendix D** provides an outline of this training and draft Q&A.

Should any concerns be raised regarding perceived inconsistencies with the Commission's ATM Policy (which restricts withdrawals to \$400 per day and the location of ATMs away from the Casino), reference to the following will be made:

- The ability for gaming staff to observe customer behaviours while using the Debit Card Chip Facility (these observations cannot be made when a customer uses an ATM, as ATMs are located off the casino floor).
- Gaming staff will be trained in specific concerning behaviours relating to the Debit Card Chip Facility, to allow the Responsible Gaming team to be contacted if concerning behaviours are displayed by a customer.
- Further, gaming staff will also be able to observe when a transaction is declined due to, for example, insufficient funds, to allow a report to be made to the RG team if considered necessary.

Other risks associated with the project have been assessed on a residual basis as **LOW**, with further detail provided in **Appendix A**.

3. Background – Cash/Debit Card Facilities at Crown Perth

The information provided below provides additional context for the Debit Card Chip Facility project:

ATMs

Whilst ATMs have been available at Crown Perth for many years, the Commission implemented an ATM Policy in 2011 which includes the following provisions:

- ATMs are prohibited from being located in the area covered by the casino gaming licence; and
- ATMs are prohibited from being located within 40 metres (walking distance) of any entrance to the gaming floor, unless the ATM has a withdrawal limit of \$400 per customer, per day (24 hours).

It is relevant to note (although this is not publicised) that credit cards can be used to withdraw cash from ATMs.

Cashouts at Casino Bars and Restaurants

Consistent with existing practice in Crown Melbourne, in March 2019 Crown Perth introduced the ability for customers to withdraw cash at casino bars and restaurants (subject to a \$400 transaction limit, debit accounts only, and with a purchase).

This was introduced in a similar manner to what is proposed for the Debit Card Chip Facility, in that bar and restaurant staff were trained in concerning behaviours, and there was no widespread advertising or marketing of the facility.

Whilst a small number of isolated complaints have been made and are being managed, there have been no adverse media or other consequences as a result of this facility.

The initial scope of this project also included cashouts at the Cage (currently, cashouts at the Cage only occur during ATM outages). Whilst this has regulatory approval, this has not yet been implemented due to sensitivities of the EFTPOS terminal provider, CBA, as outlined below.

Purchase of Tickets using Debit Cards at Ticket Redemption Terminals, and at the Cage

The Commission has also approved the purchase of tickets at ticket redemption terminals (or similar type facilities) and at the Cage for use on gaming machines. However, technology does not yet exist to facilitate debit card transactions at ticket redemption terminals and accordingly, it is anticipated that this component will not be ready for implementation at Crown Perth for a period of time (at least 6 months).

4. Technology

An evaluation process has been undertaken to determine the most appropriate debit card technology solution for the Debit Card Chip Facility, and a prototype solution from eCash is currently in testing phase.

The evaluation of EFTPOS terminals for this project also involved terminals provided by NAB and CBA. Both banks currently provide EFTPOS terminals for use in bars, restaurants and other locations at Crown Perth. CBA provides EFTPOS terminals for casino bars and restaurants, through which cashouts can be made as stated above.

During this evaluation phase, both NAB and CBA withdrew their interest in the project, prior to Crown having the opportunity to fully articulate the proposed controls and its own risk management strategies regarding the project. Further, CBA and NAB's response was in contradiction with payment facilities the banks provide in other gaming/wagering operations.

Although the eCash technology solution was ultimately considered the most suitable for the Debit Card Chip Facility project, Crown has still provided further information to the banks to ensure any final, and formal, determinations are made based on accurate information and that records held by the banks accurately reflect the project and proposed controls.

Further, CBA currently provides EFTPOS terminals for use in the Cage, for when ATMs are unavailable, and Crown would like (and has regulatory approval to) provide customers with the ability to obtain cashouts at the Cage at all times in a similar manner to cashouts at casino bars and restaurants.

5. Responsible Gaming Risk

The Commission granted approval for this facility on the basis of Crown Perth's existing responsible gaming framework, transaction limits and the prohibition of the use of credit accounts. The Commission also recognised the shift towards a cashless society, and the increased use of EFTPOS and other fund facilities in wagering, and online wagering/gaming.

For the purpose of Phase 1 and 2, the following additional controls will be implemented and have been assessed as adequate to reduce the risk of problem gaming incidents to a **MODERATE** level during the 15 week period on 27 gaming tables:

- As regulated, the \$400 transaction limit.
- Although Regulatory approval permits the use of the cardholder daily cash withdrawal limit (typically \$1,000-\$2,000), Crown has taken Professor Blaszczyński's advice and a daily limit of \$500 will be implemented on all tables throughout the trial, and subsequently for a period of at least 6 months on all non-premium area tables (refer Section 6 below).
- Face to face training in additional "observable signs/concerning behaviours", developed by the RG Team, for casino staff to observe and as necessary, for the RG Team to respond.
- Dealers will be in a position to observe transactions which are declined as a result of insufficient funds, incorrect PINs, and where daily withdrawal limits are reached. These particular situations will allow Dealers and Inspectors to assess, in conjunction with other concerning behaviours, whether the RG Team should be contacted.
- Signage on gaming tables will be discrete, with RG logos used on the customer facing screens. There will be no widespread public advertising or marketing of Debit Card Chip Facility, and no branding.
- There will be no "tap n go" enabled. A customer will be required to insert/swipe their card, and enter their PIN, irrespective of value. Further, the customer will be required to leave their seat at a table to use the facility, as the terminal will be located in a permanent position on the table.
- Terminals on gaming tables will be classed with a casino/gambling merchant code, giving patrons the ability to block their cards for use at a table (if their banks provide for this).
- The implementation of facial recognition technology is in the process of being implemented, with all casino entry cameras enabled with the technology. The names and photographs of currently excluded customers is in the process of being uploaded into the system. Once fully implemented, this will reduce the risk of self excluded patrons entering the casino (and using the facility).

In addition, the following activities will be undertaken during the implementation period:

- RG Advisors will observe the selected tables during Phase 1 and 2 and note any concerns or general observations;

- Concerning behaviour reports made by table games staff with respect to debit card use by a customer at a table will be specifically recorded and monitored;
- Any comments made with respect to debit cards on the tables by customers who contact the Responsible Gaming Information Centre during the trial period, or who self exclude during the trial period, will be specifically recorded and tracked;
- Surveillance will be requested to conduct audits of debit card transactions at tables, to identify (amongst others) potential responsible gaming matters; and
- As recommended by Professor Blaszczyński, a customer survey will be undertaken during Phase 2 in order to assess their reactions to the new facility, how it potentially influenced their behaviour and attitudes, and perceived risks.

At the conclusion of Phase 2, a further assessment on the risk of problem gaming for a wider rollout will be made and if considered necessary, additional controls will be considered.

6. Professor Blaszczyński's Report

As stated above, Professor Blaszczyński was engaged under Legal Professional Privilege to provide commentary and advice on the proposal, and in particular recommend any additional measures as part of the implementation of Phase 1 and 2 to further manage the risk of responsible gaming issues. Please refer to **Appendix B** for full copy of the report.

In his report, Professor Blaszczyński refers to there being *"a good argument to suggest that the use of debit card facilities at gaming tables allows staff to more effectively monitor customer behaviours at tables and therefore the ability to intervene earlier to prevent or reduce gambling related harms. It is more difficult for staff to monitor ATM withdrawals at machines that are located outside the gaming floor and out of the view of staff"*.

Professor Blaszczyński also reports that, in his view, the primary challenges and risks are the high withdrawal limit and the absence of opportunity for breaks in play compared to withdrawals from ATMs and EFTPOS, and that this criticism will overshadow the benefits the facility brings to monitoring. As a consequence, Crown Perth has determined to reduce the daily limit from the cardholder limit (typically \$1,000-\$2,000) to \$500 for all tables during Phases 1 and 2, and thereafter for a period of at least 6 months on all non-premium area tables.

Other recommendations made by Professor Blaszczyński which have been incorporated into Phases 1 and 2 of the trial include the following:

- Inclusion of an additional step on the terminal, just prior to the insertion of a PIN, to invite customers to reappraise their decision and confirm that they wish to continue with the transaction.
- Performance of a customer survey, to assess reactions to the new facility, how it potentially influences their behaviour and attitudes, particularly the impact on the use of ATMs or existing EFTPOS transactions, and perceived risks. However, this will apply for Phase 2, for the first 4 weeks (assuming strong coverage, otherwise it will be extended). After which, for the remaining 9 weeks, the outcomes of the survey can be incorporated as appropriate into the full rollout plan.

Other recommendations made by Professor Blaszczyński in his report, as listed below, will be considered further as part of the evaluation of Phases 1 and 2. These strategies were recommended assuming that the cardholder's cash limit applies. The reduction of withdrawal limit to \$500 addresses most of these concerns, and will be reassessed at the conclusion of Phase 2:

- The active monitoring of customers using the facility i.e. movement between tables and ATMs, and/or making a number of small transactions to avoid monitoring or staff noticing how much/often they are using the facility. [Note: during Phase 1 and 2, Table games and RG Advisors will be requested to observe, to the extent possible whilst performing their other duties, customers who move between tables and ATMs in this manner. However without a technological solution, this may not be fully effective].
- Staff immediately informing an RG team member following two withdrawals of any amount made at the table (this recommendation specifically references the cardholder limit). Discouraging the further use of the facility with recommendations that the customer discuss restrictions on the use of the debit card facility directly with their bank. [Note: RG Advisors will monitor the Phase 1 and 2 areas, and will monitor for unusual or concerning behaviours involving the facility.]
- Incorporating the above monitoring process into key messages which staff can provide customers.
- Staff routinely asking customers to confirm that they want to continue withdrawing funds for gambling, and that they are not motivated to chase losses. This should be accompanied by a brochure (see below).
- Provision of facility-specific RG brochures to customers. [Note - Generic RG brochures are in the process of being placed on all tables. Specific RG brochures tailored to the use of the facility will be developed at the conclusion of Phase 2].

Management Recommendation

Management seeks the endorsement of the Committee to progress the implementation of the Debit Card Chip Facility on gaming tables, in accordance with the approach outlined above. Subject to the completion of satisfactory testing of the final eCash prototype, and Committee endorsement, the scheduled commencement date for Phase 1 is 30 March 2020.

Updates on the project will be included within the current Material Risk Update report provided to the Committee at its scheduled meetings.

APPENDIX A – RISK ASSESSMENT

Some of the major inherent risks associated with Debit Card Chip Facility project are noted below, along with both existing controls, and additional controls proposed to further reduce the residual risk during Phase 1 and 2.

The main risks identified are as follows:

1. Responsible gaming;
2. Adverse media;
3. Customer appetite for the use of the technology in this manner;
4. Adverse operational impacts;
5. Financial feasibility; and
6. Fraud.

Risk	Existing Controls in Place	Additional controls proposed for duration of Phase 1 & 2	Residual risk level – Phase 1 -2
1 – Responsible Gaming <i>The risk that the ability to obtain chips at a gaming table using a debit card, rather than walking to an ATM, impacts on “at risk” patrons and their gambling behaviours.</i> <i>Specifically, the facility could be seen as not being commensurate with the casino’s commitment to providing a “safe gaming environment”; and restricts the opportunity for breaks in play.</i>			
	<ul style="list-style-type: none"> Existing responsible gaming framework including dedicated 24/7 resources, purpose built centre and self exclusion programs. Existing training provided to staff with respect to responsible gaming, in particular, concerning behaviours and reporting. Existing length of time monitoring – patrons who have been gaming for more than 12 hours are approached by the Responsible Gaming team. Facial Recognition at casino entrances to identify self excluded patrons who attempt to re-enter the casino (in progress). Existing revocation process provides for close follow up of patrons 3 months after revocation. <p><i>Note: reference has been made in the media that cashless has the ability to give activity statements to the patron (via bank statements), which is seen as a</i></p>	<ul style="list-style-type: none"> \$400 transaction limit (regulated, consistent with cashouts at casino bars & restaurants). Daily limit (below the regulated amount) of \$500 per day. Phased approach to implementation – restricted implementation on 27 tables for 15 weeks, to assess controls. Terminals on gaming tables will be classed with a casino/gambling merchant code, giving patrons the ability to block their cards for use at a table (if their banks provide for this). Development of specific observable signs/concerning behaviours relating to the facility, to be delivered via face to face training to gaming staff by the Responsible Gaming team. The technology has been designed to allow Dealers to observe when a patron’s card has been declined due to Insufficient Funds, or Daily Withdrawal Limit reached. 	MODERATE

APPENDIX A – RISK ASSESSMENT

Risk	Existing Controls in Place	Additional controls proposed for duration of Phase 1 & 2	Residual risk level – Phase 1 -2
	<i>positive.</i>	<ul style="list-style-type: none"> Discrete signage will be developed for the facility only, with no advertising or marketing. RG Advisors will observe the selected tables and note any concerns or general observations, including movement of customers to avoid monitoring. Concerning behaviour reports made by table games staff will be specifically recorded and monitored. Monitoring comments made by patrons during self exclusion or other contact with the Responsible Gaming Information Centre. Surveillance audits of debit card transactions at tables. Customer surveys conducted during Phase 2, to monitor how the facility influences behaviours. Incorporation of Professor Blaszczyński's recommendation of an additional step in the transaction process to confirm intention. RG brochures on all tables. <p>At the conclusion of Phase 2, a further assessment on the risk of problem gaming for a wider rollout will be made and if considered necessary, additional controls will be considered.</p>	
2 – Adverse Media <i>The risk that (irrespective of the adequacy of responsible gaming controls), the public perceive Crown's actions as questionable by providing customers with easier and faster access to gaming chips while at a table.</i>			
	<ul style="list-style-type: none"> Public Relations expertise Complaints management procedures 	<ul style="list-style-type: none"> Corporate Affairs – Media response plan drafted, referencing: <ul style="list-style-type: none"> Approval by the Commission Strength of Crown Perth's Responsible Gaming framework Phased implementation approach Shift towards a cashless society All project activities undertaken to date have been done so on a confidential 	HIGH

APPENDIX A – RISK ASSESSMENT

Risk	Existing Controls in Place	Additional controls proposed for duration of Phase 1 & 2	Residual risk level – Phase 1 -2
		basis. <ul style="list-style-type: none"> Close stakeholder management during phases 1 and 2 Training of dealers in the shift towards a cashless society, and in appropriate responses to provide to patrons 	
3 - Customer Appetite <i>The risk that the Debit Card Chip Facility is not used by customers to the extent anticipated, due to the transparent nature of transactions (ie transactions appear on customer bank statements, with the terminals on tables classed with a "Casino/Gambling" merchant code in the banking system). This may impact on the financial feasibility of the project, in that the financial returns are not sufficient to cover transaction costs and the loss of ATM fee revenue.</i>			
	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Customer take up, comments and feedback will be closely monitored during Phases 1 and 2, and considered prior to investing heavily in any additional technology. 	LOW
4 - Adverse Operational Impacts <i>The risk that the Debit Card Chip Facility adversely impacts the operation of a game, resulting in reduced operating margins (ie reduced number of hands per hour) and customer dissatisfaction.</i>			
	<ul style="list-style-type: none"> Existing operational metrics Role playing conducted during evaluation phase to ensure technology minimises impact on game – this resulted in a fixed terminal with transactions initiated by the customer Approach consistent with the trial conducted in Nevada 	<ul style="list-style-type: none"> Specific project performance measures have been determined, with appropriate baseline data collated. Tables included in Phases 1 and 2 have been selected to ensure performance can be measured across a range of game types, price points, and customer segments. An analysis of impact on table operations will be conducted at the conclusion of Phase 2. 	LOW
5 – Financial feasibility <i>The risk that the financial returns from the Debit Card Chip Facility does not outweigh the transaction fees paid by Crown and the loss of ATM Fee Revenue currently being earned by Crown (approximately \$3 million per annum).</i>			
	<ul style="list-style-type: none"> Investment in technology and transaction fees have been closely managed to date. 	<ul style="list-style-type: none"> As per above. An overall financial analysis will be conducted at the conclusion of Phase 2. 	LOW

APPENDIX A – RISK ASSESSMENT

Risk	Existing Controls in Place	Additional controls proposed for duration of Phase 1 & 2	Residual risk level – Phase 1 -2
6 - Fraud <i>The risk of card and other fraud related to the Debit Card Chip Facility, resulting in financial loss and potential reputation damage.</i>			
	<ul style="list-style-type: none"> Existing fraud control framework, including Surveillance IT Governance involvement in project 	<ul style="list-style-type: none"> The requirement for all transactions to require a PIN, irrespective of value. Anti-skimming controls incorporated into the terminal hardware. The performance of IT penetration testing of the proposed technology, prior to implementation. 	LOW

APPENDIX B – PROFESSOR BLASZCZYNSKI'S REPORT

RAWDON CONSULTANCY

Director: Alexander Blaszczyński PhD

9 Miller Street
Petersham, NSW 2049
Australia

Personal
ABN: 37630904077
ACN: 630904077

Personal Information

10/12/2019

Claude Marais
General Manager – Legal and Compliance
Crown Perth
PO Box 500, Victoria Park
Western Australia, 6979
Australia

This document is produced for the purpose of preparing legal advice and assistance and for the purpose of preparing litigation. It is confidential and subject to a claim of legal professional privilege.

Dear Claude Marais

Re: Engagement to Provide Expert Opinion on use of EFTPOS (debit cards) at Crown Perth

I refer to your letter dated 8 October 2019 requesting expert opinion on the proposal to introduce EFTPOS (debit card only) for the purposes of purchasing chips from designated areas within the casino and at gaming tables, and tickets at ticket redemption terminals for use on electronic gaming machines (EGM).

I have at hand the following documents provided by you setting out the conditions of the approved proposal and terms of engagement sought, and related relevant documents:

1. *Letter of engagement* dated 8th October 2019
2. *Attachment 1*: Crown Perth proposed Phase 1-2 implementation of EFTPOS at gaming tables
3. *Attachment 2*: Responsible services of gambling framework – Crown Perth (dated 14th November 2018) including supporting publications: Responsible Gambling, Self-exclusion, Responsible Gambling Code of Conduct, Application form for self-exclusion, Third Party Self-exclusion and application forms, and Annual Compliance Plan FY19: Department: RSG.
4. *Attachment 3*: Cashless payments (EFTPOS and Contactless) – Crown Perth.

Crown Perth seeks expert commentary and advice in relation to the following matters:

1. The existence of any relevant research relating to comparable functionality;
2. Additional measures recommended as part of the implementation of Phases 1 and 2 to further manage the risk of responsible gambling issues;
3. Additional key messages recommended to gaming staff;

3

4. Additional information recommended that should be captured and monitored during Phase 1 and 2, either in the casino and/or during an engagement with customers;
5. Any other matters relating to this proposal considered pertinent

1. The existence of any relevant research relating to comparable functionality;

Cashless and card-based gambling:

Crown Perth has gained approval from the Gaming and Wagering Commission (WA) to use EFTPOS debit cards to purchase chips or tickets in designated areas in the casino and at gaming tables. Tickets purchased at redemption machines are for use on gaming machines. Following a trial period, and subject to the outcomes of a post implementation report, the intention is to fully implement this facility within the casino. Currently, the trial is restricted to debit chip card facilities at specified gaming tables during phases one and two. Withdrawals are to be limited to \$400 per transactions with a daily cash withdrawal limits set by the customer's financial institution, typically between \$1,000 to \$2,000. The \$400 is consistent with the present capacity for customers to obtain cashouts at both Crown Melbourne and Crown Perth casino bars and restaurants.

Attachment 3 sets out the arguments supporting the extension of debit card use for purposes of gambling, namely evidence indicating a significant shift in consumer practice from the use of cash to cashless forms in the purchasing of a range of products and services. As noted, evidence suggests a continuing decline in the general use of cash for consumer purchases of goods and services in preference to electronic forms. Such cashless transactions include but are not limited to the use of PayPass/PayWave for debit and credit cards, digital wallets (iPhones, iWatches and Google Pay), and tap and go Opal cards for transport. Cashless formats are gaining increasing consumer acceptance given the attraction of their ease of use, convenience and frictionless transactions, particularly for small purchases under \$100 (tap and go without Pin verification).

For land-based gambling venues, concerns over the use of credit and debit cards increasing the risk of excessive gambling losses have led to restrictions placed on the location of ATMs in gaming floor areas, their removal from some venues (from 2012 in Victoria), and the imposition of daily withdrawal limits. These responsible gambling (RG) strategies are designed to (a) limit access to additional funds made under conditions of impulsive and/or emotional arousal ('hot emotions'), and (b) represent a break-in-play allowing individuals to reappraise their decision to withdrawal additional funds. Variations exist between clubs, hotels and casinos across states and territories in respect to location or availability of ATMs and withdrawal limits.

A number of comparable functional cashless alternatives to credit and debit cards for gambling have been considered over the years. These alternatives offer the capacity to pre-load amounts of money onto specialised cards or bar-coded tickets for purposes of gambling as an alternative to using cash (Drawson et al., 2017; Nisbet, 2005; Parke, et al., 2008). These alternative options have been comprehensively reviewed by Parke et al. (2008), namely cards containing magnetic stripes that contain encrypted data, smart cards which are similar but replace the magnetic strip with a chip, and ticket systems (ticket-out and ticket-in-ticket out) using printed vouchers with data embedded in bar-codes.

The guiding responsible gambling principle for the use of functional alternatives is twofold: pre-loading cards is consistent with the concept of *pre-commitment*; and provides individuals with an activity summary statement of net expenditure to monitor their gambling expenditure with the exception of ticket systems. These cashless options have the advantage that individuals are required to make a conscious decision to load cash onto their cards or tickets prior to commencing a gambling

session and while in a 'cold-emotional' state (consistent with the principles inherent in the concept of pre-commitment).

On the other hand, individuals are at risk of forgetting to bring their cards to venues or will pre-load cards with larger amounts to avoid running out of funds and suspending a session of play. This may increase the risk of individuals gambling to the higher amount deposited and gambling more than intended. No empirical data is available on the proportion of individuals forgetting cards, pre-loading higher limits, or gambling to those higher limits using these various formats.

From a commercial perspective, there are additional costs incurred in setting up and maintaining cash-transfer devices, that is, cards and ticket systems. Further, unless the use of these cards is mandatory, individuals can continue gambling once the deposited smart card funds are exhausted by using cash through additional withdrawals via ATMs or EFTPOS located at venues or in their close proximity.

As Parke et al. (2008) note, the empirical evidence on the use and impact of these types of card-based and cashless formats is limited to the extent that no conclusive statements can be made regarding their impacts on responsible gambling behaviours or contributions to the development or exacerbation of problem gambling. Most published reports were qualitative in nature eliciting the views and opinions of key stakeholders.

Although Parke et al. (2008) did not specifically review the literature on credit and debit cards, these authors observed that UK betting shops allowed the transfer of funds to Fixed Odds Betting Terminals (FOBTs) through the use of debit cards at the cashier's desk. Parke et al. (2008; page 61) found that experts expressed the view that the direct electronic transfer of funds to machines played an integral role as a contributor to problem gambling, and that researchers and problem gamblers considered the removal of this facility as the second most effective modification in reducing problem gambling. However, the findings related to the use of debit cards in the absence of any reference to daily withdrawal limits, monitoring of withdrawals by staff, or responsible gambling strategies.

Given Parke et al.'s (2008) comprehensive review of the literature on cashless gambling using smart card-based and ticket formats, the remainder of this report will limit its scope to the use of standard financial institution issued consumer debit cards in gambling. Debit cards require the depositing of funds into an account prior to being able to make any purchases. Purchases are limited to the available balance within the account. In contrast to credit cards, debit cards prevent account holders from spending in excess of amounts held and consequently creating a debt.

Use of debit cards

For both online and land-based venues, access to funds are available through debit or credit card withdrawals at ATMs (subject to jurisdiction) or EFTPOS transactions. Given that multiple use of in-venue ATM's is one significant behavioural indicator of problem gambling (Delfabbro, 2008; Delfabbro et al., 2007; Hafeli & Schneider, 2006; McMillan et al, 2004; Schrans & Schellinck, 2004), efforts designed to limit access and withdrawals have been introduced, primarily affecting land-based venues. The rationale for locating or removing ATMs from the gaming floor or venue is to reduce the potential for customers to access additional funds to chase losses. The requirement to leave the gaming floor allows a break-in-play and opportunity for the customer to reappraise decisions to continue gambling.

Community attitudes towards ATM restrictions in or their removal from land-based gaming venues are mixed. Responses to survey questionnaires indicate that between 47% to 56% of respondents

supported removal of ATMs (Allen Consulting Group, 2011; McMillan et al., 2004; Rodda & Cowie, 2005) with a significant majority (86%) approving daily withdrawal limits (McMillan & Marshall, 2003; McMillan et al., 2004).

Following the opening of the first regulated online casino in Barbuda and Antigua in 1996 and Intertops online sporting in the same year, electronic forms of transfer including debit cards continue to be used in depositing funds into online accounts for purposes of horse and sports wagering and the purchase of lottery tickets. This facility is comparable to the use of debit cards at ATM's at gaming venues (where available). The fundamental difference between online electronic transfers and use of land-based ATM's is the absence of withdrawal limits imposed on the former compared to the latter.

From a responsible gambling perspective, the use of debit cards for online gambling allow unrestricted transfer limits (unless the account holder voluntarily sets deposit limits) that are made at remote locations (at home, work or elsewhere). This means that gambling operators rely predominantly on expenditure patterns (algorithms and behavioural tracking), complaints, or money transfer problems to detect potential problem gamblers as opposed to land-based venues where direct observation by staff can detect intoxicated play, distress or other indicators of problems and intervene at an earlier point in time.

Debit cards in land-based venues

The use of debit and credit cards within land-based casinos appears to have emerged in the mid 1990's in the USA in the context of the New Jersey Control Act's (Schier, 1997) definition of *cash equivalents*. The Casino Control Commission in 1981 expanded the definition under Section 101 of the Act to include 'recognized credit cards' allowing patrons to obtain cash advances after appropriate verification checks at the cashier's cage. Legislative changes to the Act in 1995 sanctioned the use of debit in addition to credit cards. Procedures were imposed where patrons initiated the written application for cash advances or withdrawals to the dealer followed by the pit clerk validating the card and obtaining authority from the issuer prior to providing the requested amount for gaming chips. Schier (1997) expressed some degree of surprise that the 'compulsive gaming lobby' remained silent on the changes made failing to offer commentary on the new regulations prior to their approval. No studies were found evaluating the impact of the change in this 1995 Act on problem gambling.

Accordingly, a scoping review of the literature was conducted for purposes of this report to identify any studies that evaluated the use of debit cards in gambling venues. Using the search terms, '[gambling OR wagering OR betting] and [debit card]' in the following databases, Scopus, ProQuest Central, Web of Science, and Informit (covering 96 databases), Ovid, Google Scholar, database outputs produced between 11 and 106 results. Of these most were outside the scope of the present study referring typically to online gambling transactions, preferred forms of transfers, for example, credit card, debit card, bank transfer, Neteller, cheque, among others (McBride & Derevensky, 2009) or reported impacts of the removal of ATMs from venues (Allen Consulting Group, 2011). There were no studies directly related to the use of debit cards on gaming machines and/or table games on the gaming floor.

This result was expected given that attention has been directed to the placement away from or the removal of ATM's from the gaming floor or venue where both credit and debit cards could be used to access funds (see Schottler Consulting, 2017). Thomas et al., (2013) evaluated the impact of the removal of ATMs from Victorian gambling venues (excepting Crown Melbourne) on revenue and problem gambling. Findings revealed a reduction in patronage and expenditure (7% reduction) with reported increased self-control and reduction in overspending by problem gamblers. Both non-

gaming and gaming expenditure were affected which is consistent with findings from studies reporting that of ATM withdrawals, approximately 50% to 86% were allocated to beverages, 15% to 80% on meals, and 30% to gambling, respectively (Australian Centre for Gambling Research, 2004; Price Waterhouse Coopers, 2009). Similar proportions for EFTPOS allocations were reported with 33% allocated to gambling.

Based on the available evidence and community expectations, legislators both nationally and internationally have consistently acted to impose restrictions on the placement of ATMs or their removal from gaming venues, and varied limitations on EFTPOS withdrawals across Australian jurisdictions. No such attention has been directed to online gambling electronic transfers beyond options for the voluntary setting of deposit and/or loss limits.

Trial use of debit cards at gaming tables, electronic gaming machines and in designated gaming areas

Currently, a trial use of debit cards at gaming tables is being implemented in Las Vegas, USA. According to Carol O'Hare, Executive Director, Nevada Council on Problem Gambling in Las Vegas, the Gaming Commission has approved a one-month field trial commencing in March 2019 of ACS PlayOn hand-held debit device¹ at two tables at Red Rock Resort and Casino. The PlayOn device is technically set up to offer the capacity for players to swipe debit cards at gaming machines and tables games. The device is linked to the PlayOn Financial Management System that provides detailed gaming transaction in real time for internal controls and compliance purposes. There is no data available on the outcome of this trial to date.

From a responsible gambling perspective, the proposal to use debit cards at point of consumption (i.e., directly at table games) is potentially likely to elicit community concerns given this facility will be argued to increase the ease of access to funds, particularly during a session under conditions of 'hot' emotions and impulsive decision-making. The research literature is consistent in reporting that ease of access to funds in the context of chasing losses represents a major contributor to and indicator of problem gambling (Delfabbro et al. 2007; McDonnell-Phillips, 2005; Schottler Consulting, 2010). For example, one report evaluating the impact of placements of ATM's at NSW club and hotel venues (Schottler, 2017) found a third of electronic gaming machines players elected to use ATM's within a previous twelve-month timeframe. A greater proportion of moderate risk and problem gamblers reported doing so; 72% and 83% respectively compared to non-problem gamblers (30%). The average ATM withdrawals per visit across categories of gambling status were as follows: non-problem gambler, \$62, moderate risk gambler, \$257, and problem gambler, \$482. The reported proportion of withdrawals allocated to EGM play as opposed to other purchase was \$33 (51%), \$196 (68%), and \$325 (61%), respectively. The data in the Schottler (2017) study represents self-reported estimates of expenditure and subjective perceptions on the impact of ATM placements.

The Crown Perth proposal, it may be argued, will also be interpreted as contrary to the rationale used to justify restrictions on ATMs at gambling venues. Given evidence that access to funds contribute to problem gambling, governments have implemented policies designed to regulate the placement and withdrawal limits of ATM's at land-based venues: all Australian state and territories prohibit the location of ATMs in venue gaming areas with exemptions available in some jurisdictions; and additionally impose withdrawal limits per transaction and daily totals: South Australia (\$200 per transaction and \$250 daily limit), Tasmania (\$200 daily limit hotels, \$400 casino), Victoria (ATMs prohibited. \$200 per transaction and \$500 EFTPOS daily limit)², Northern Territory (\$200 per transaction), and ACT (\$250 daily limit since 2004). At Crown Perth, ATMs are "prohibited from

¹ <https://www.acsplayon.com/>

² (<https://www.vcglr.vic.gov.au/gambling/gaming-venue-operator/understand-your-gaming-licence/cash-machine-gaming-venues>)

being located in the area covered by the casino gaming licence, and ATMs are prohibited from being located within 40 metres (walking distance) of any entrance to the gaming floor, unless the ATM has a withdrawal limit of \$400 per customer, per day (24 hours)”³. Facilities to obtain \$400 cash at the Casino’s bars and restaurants are permitted. The varied per transaction limits reflect the difficult balance between allowing access to cash and protecting individuals from impulsive decisions to obtain additional funds to gamble resulting in excessive losses.

Debit card withdrawal limits

Standard ATM cash withdrawals (as opposed to purchase transactions) at non-gambling locations/venues are typically set to a daily limit of \$1,000 but Individuals are able to reduce this through their financial institution or increase it to a maximum of \$2,000. As noted above, based on data describing comparative differences in the typical ATM withdrawal amount made by individuals at gambling venues, limits have been set at \$200 to \$250 per withdrawal with an upper daily maximum of \$400 to \$500. In contrast, the Crown Perth proposal refers to the implementation of a \$400 transaction limit for a total of daily limit of \$1,000 to \$2,000 at gaming tables. This is consistent with current practices at both the Melbourne and Perth properties for EFTPOS withdrawals at bars and restaurants.

However, the proposal will allow debit card withdrawals at the gaming table and subsequently on designated areas on the gaming floor. There are several matters of potential concerns that need to be considered; 1) given standard daily cash withdrawal limits are typically set at \$1,000 to \$2,000 the Crown Perth proposal will attract the criticism that allowing debit transactions at gaming tables and subsequently designated areas on the gaming floor is equivalent to bringing an ATM/EFTPOS onto the gaming floor; and 2) by doing so, this effectively increases the capacity to withdraw from debit cards by a magnitude of two to five times the daily limits that are currently in place for ATMs.

Although customers are able to withdraw \$400 from EFTPOS at the bar and restaurants, doing so entails a break in play and is considered comparable to a customer leaving a table to withdraw funds from an ATM off the gaming floor. This factor will not apply to debit card withdrawals at tables since the break in play will be considered insufficient to allow a customer to reappraise their decision. Although the location of the terminal will require a customer to physically move from their seat to conduct a transaction via the terminal fixed to the table, the interruption to play is substantially less than that compared to moving from the gaming floor to an ATM. It is noted that at no time can a transaction be conducted during play or while seated at the gaming table. The risk is that the proposal will be interpreted as an attempt to circumvent the concept of a reasonable break in play and encourage over-expenditure.

Whether or not the argument that staff are better placed to interact with a customer during a transaction and encourage his or her reappraisal of the decision gains community acceptance is yet to be determined. To counter any possible criticism of conflicts of interest and perception of circumventing breaks in play, table staff should be required to request customers to reappraise their decision for each transaction, and to provide a responsible gambling brochure specific to the use of this facility as a standard procedure. This is consistent with appropriate responsible gambling practices and demonstrates a commitment to minimizing potential harms associated with the use of the facility.

Further, in my opinion there is an argument to be made for Crown Perth to justify the daily limit for purposes of gambling (\$400 per transaction; daily maximum \$1,000 to 2,000) that is much higher

³ [https://www.dlgsc.wa.gov.au/departments/publications/automatic-teller-machines-\(atms\)-at-crown-perth-policy](https://www.dlgsc.wa.gov.au/departments/publications/automatic-teller-machines-(atms)-at-crown-perth-policy)

that permitted through ATMs in other venues. This opinion is based on the notion that the facility is comparable to bringing ATM/EFTPOS onto the gaming floor in the absence of offering breaks in play and therefore different in principle from EFTPOS withdrawals at bars and restaurants. If there is no empirical evidence offered by Crown Perth to justify this higher limit and/or data on its impact on problem gambling, then it is reasonable to argue that the limits imposed nationally at Australian casino ATMs should be adopted in the trial evaluation period. The proposal's limits then, would be seen as consistent with those imposed in other states and territories. Note that evidence suggests that around a third of EFTPOS withdrawals are allocated to gambling. This suggests that a \$200-\$250 debit card facility limit is consistent with the proportion of ATM's and EFTPOS withdrawals that are currently allocated to gambling.

Debit card use and responsible gambling strategies

There are advantages to the use of debit cards at gaming tables from a responsible gambling vantage point. It is easier for gaming staff to monitor the number of transactions made at one table and intervene if multiple withdrawals are made as compared to an individual using ATM machines located outside the gaming floor. Staff can also act directly to encourage customers to reappraise their decisions to withdraw funds and caution against chasing losses. Withdrawals allow staff to observe customers when a transaction is being made on the device fixed to the table. Customers are required to insert their pin number (no PayPass permitted) and once the transaction is completed, required to take their receipt from the terminal, and a voucher is printed on the table for the dealer to action. The dealer hands the chips to the customer based on amount specified on the voucher.

Although the dealer is not directly involved in the processing of the transaction using the device, dealers and inspectors are able to observe the behaviour of customers when using the terminal, and when handing over the chips. Dealers are also in a position to observe where a transaction is declined due to insufficient funds. When appropriate, gaming staff are able to intervene and request an individual to reflect on their decision to withdraw additional funds, particularly if any second withdrawal is for the current limit of \$400 per transactions. A further withdrawal would initiate a more detailed assessment by a responsible gambling team staff member.

In the trial period, it is recommended that customers using debit cards are monitored closely to determine the proportion making one or two withdrawals at the trial table and subsequently using the ATM for further withdrawals to avoid embarrassment and/or interventions by staff members. If implemented across multiple gaming tables following the trial and approvals, it will be important to monitor customers making small withdrawals across multiple gaming tables for the same reasons. Clear guidelines and protocols for monitoring, detecting and managing indicators of problems must be established for dealers and inspectors.

2. Additional measures recommended as part of the implementation of Phases 1 and 2 to further manage the risk of responsible gambling issues

Phase 1: two-week technical trial:

The first phase is designed to evaluate the operational use and technical compliance of the eCash tabletop facility. Attachment 1 sets out details of the proposed trial. It is understood that a tabletop signage plus welcome screen on EFTPOS tablets will be incorporated into Phase 1. How will customers be aware or informed of their ability to use debit cards at the table? If not, then it is anticipated that the use of the facility will be relatively minimal during the trial period.

During this Phase, the product's performance will be assessed in detail as outlined in Attachment 1. Reference in that attachment is made to more detailed performance measures in Appendix A, a copy of which was not provided to me.

These performance measures will be applied during Phase 2. It is also recommended that customers using the facility at one table be monitored to see if they move to another table with the facility and withdraw additional funds.

Attachment 1 also sets out the key training messages to be developed for staff, questions and answers for customers, and responsible gambling observable signs. The latter two are considered appropriate and will provide customers with relevant information on the use of the facility.

To manage risks (assuming Crown Perth retains the \$1,000 limit), staff should immediately inform a responsible gambling team member following two withdrawals of any amount made at the table. This will act to prevent potential complaints or negative consequences for customers using this facility to gamble more than intended. It is suggested that this proactive and more conservative approach should be adopted in the trial phase in addition to the standard observable indicators of problem gambling being monitored. Where necessary and as assessed by the responsible gambling team member, further use of the facility by the customer should be discouraged with recommendations that the customer discuss restrictions on use of the debit card directly with his/her financial institution. However, note that it is recommended that the withdrawal limits at trial phases 1 and 2 are consistent with those currently imposed in other casinos.

Consideration should be given to the possibility of including a message on the display screen of the device before requesting the insertion of a pin number. The message should invite customers to reappraise their decision and confirm that they wish to continue with the transaction. The message could contain a statement to the effect, 'consider whether you really want to continue gambling', or 'please do not withdraw to chase losses'. If the device screen does not permit such messages, such message labels could be placed on the device and/or a responsible gambling brochure. For each transaction, customers should be given a responsible gambling brochure designed to inform them of the risks associated with the use of debit cards and services available if needed. This could be discretely provided with a copy of their transaction receipt.

It is recommended that following cessation of their session of play, customers using the facility be interviewed/complete a survey assessing the reactions to the new facility, how it potentially influenced their behaviour and attitudes, particularly its impact on the use of ATMs or existing EFTPOS transactions, and perceived risks. This will provide a foundation pre-empting possible risks and informing customer assessment surveys at the more formal Phase 2 customer evaluation.

Phase 2: Operational trial

In this phase, the facility will be rolled out across 27 tables. Accordingly, and building on the above risk management, customers using the facility at one table should be closely monitored to determine the extent to which they move from table to table to withdraw additional funds to avoid staff observing repeated withdrawals.

3. Additional key messages recommended to gaming staff;

Staff are already trained in responsible gambling procedures and protocols as described in the resources contained in Attachment 2, including interactions with staff. Attachment 1 lists the general key training messages that are being developed for staff.

A key message incorporated in the training for staff should include information for customers that their withdrawals will be monitored and that a responsible gambling team member may approach them for their well-being and to ensure that they are gambling at affordable levels.

Staff should routinely ask customers to confirm that they want to continue withdrawing funds for gambling, and that they are not motivated to chase losses. This should be accompanied by a responsible gambling brochure handed to customers at the first transaction using the facility.

4. Additional information recommended that should be captured and monitored during Phase 1 and 2, either in the casino and/or during an engagement with customers

Ideally, the gambling status of customers using the facility should be assessed. This would provide an overview of the extent to which recreational as compared to at-risk or problem gamblers are attracted to using this facility. This can occur in the context of phase 2 evaluation where customers are approached and requested to offer their reactions to the facility. This can be done either in during this interview, or customers could be provided with a URL link to the questionnaire and offered a voucher for food or beverages in return for completing the survey.

If technically and feasibly possible, a record should be kept of the average withdrawal made by a customer and permission given to match this to their gambling status. This would allow an estimate of differences in average amount withdrawn by gambling status.

5. Any other matters relating to this proposal considered pertinent

There is good argument to suggest that the use of debit card facilities at gaming tables allows staff to more effectively monitor customer behaviours at tables and therefore the ability to intervene earlier to prevent or reduce gambling related harms. It is more difficult for staff to monitor ATM withdrawals at machines that are located outside the gaming floor and out of view of table staff.

The primary challenges and risks, in my opinion, is the high withdrawal limit and absence of opportunities for breaks in play as compared to withdrawals from ATMs and EFTPOS. In my opinion, criticism will be levelled on the withdrawal limit thereby overshadowing the potential benefits associated with closer staff monitoring. A lower withdrawal limit at the gaming table consistent with that imposed on ATMs (retaining the \$400 EFTPOS withdrawal at bars and restaurants) will serve to counter this criticism and focus more attention on the benefits of monitoring.

In addition, clear written protocols and criteria specifying how, when and what staff should do in response to requests for debit card facility use should be readily made available. Apart from providing guidelines for staff, such protocols can inform others of the potential responsible gambling benefits associated with closer staff monitoring of withdrawals.

Your sincerely,



Alex Blaszczyński PhD

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APPENDIX C – MEDIA RESPONSE PLAN

Cashless - Perth

** Debit Card Chip Facility (DCCF) = EFTPOS is one option which will be able to be used, together with Scheme debit cards (i.e. Visa Debit). The facility will not be contactless – swipe/insert plus PIN will be needed, irrespective of value.*

Technical Questions and Proposed Responses

When and where will DCCF be rolled out? What is the strategy behind the locations?

The facility will be rolled out in a phased approach:

- *Phase 1: 1 week on a gaming table, followed by 1 week on 3 additional gaming tables (Black Jack, Roulette and Money Wheel).*
- *Phase 2: 13 weeks on 27 gaming tables on the Main Gaming Floor.*
- *Phase 3: Full implementation – will be dependent on outcomes of Phase 1-2. For example, it may not be feasible to include on all tables.*

How many DCCF will be rolled out?

Refer above.

Will the use of DCCF be advertised and to whom and how?

There will be no advertising or marketing during Phase 1-2. We expect there will be a number of items for further consideration and operational fine tuning needed, as there is no benchmark for us to use for this. Signage will be limited to small table top signs and the terminal itself (a fixed location on the tables).

Are there limits to the amount of money a person can get out?

Yes. There is a \$400 transaction limit similar to cash outs at casino bars and a daily limit of \$500 (note – for a period of 6 months, then will be subject to review, and on non-premium area tables only).

Can someone use their Credit Card to get money out? If not, how will this be policed?

No, the Gaming & Wagering Commission has prohibited the use of credit cards. The system will not be configured for credit cards. This will be tested prior to implementation.

Do you have to have a Crown Rewards card to use DCCF?

No – this is a standalone system at each table. However in the future, we may look at integrating it to other Crown systems.

RSG

Have all Crown staff been trained in an RSG capacity on the use of DCCF? If so what is the training? When did this start and what does it include?

Prior to implementation – all table staff will have face to face training in relation to this facility, covering – RSG (observable signs); how to use it; and why we are implementing it.

The extensive training will be delivered face to face by Inspectors and RSG.

The training will address the following key points:

- *Why Crown is introducing this to customers;*
- *Concerning behaviours which must be reported to the RSG team; and*
- *The use of the terminal itself and associated procedures.*

In order to assess the impact of this technology on customers, in particular “at risk” customers, from a responsible gambling perspective, the following activities will be undertaken during the trial:

- *RSG Advisors will specifically observe the above tables during the trial and note any concerns or general observations;*
- *Concerning behaviour reports made by table games staff with respect to DCCF use by a customer at a table will be specifically recorded and monitored;*
- *Any comments made with respect to the DCCF on the tables by customers who contact the RGIC during the trial period, or who self-exclude during the trial period, will be specifically recorded and tracked;*
- *Customer surveys will be undertaken to assess customer reaction to the use of the DCCF, during the first 4 weeks of Phase 2.*
- *Surveillance will be requested to conduct audits of cashouts at tables, to identify (amongst others) potential RSG matters.*

What specific harm minimization features are available and are there any additional RSG measures intended to be applied as part of DCCF i.e. a warning messages on the machines or posters etc. approved by the Government?

The Gaming & Wagering Commission approved this on the basis of Crown Perth’s existing Responsible Gaming Framework, subject to:

- *a \$400 transaction limit*
- *limiting it to debit cards only (use of credit is not permitted when gambling at the casino)*
- *daily cardholder cash withdrawal limit to apply*
- *a 3 month post implementation report*

Of particular note:

- *Crown has taken the additional measure of implementing a \$500 daily limit for a period of at least 6 months.*
- *Having the facilities on the tables means staff can observe behaviours when using the facility, which cannot be done when a customer is using an ATM.*
- *In addition to training in “observable signs”, Table Games staff will also be made aware (via the processes involved) where a transaction is declined due to insufficient funds or incorrect PIN. These declined transactions, coupled with an assessment of other observable signs (frustration, anger, comments made, etc.), will allow staff to report concerns to the RG team.*
- *The DCCF technology will include RG logo and contact details.*
- *New facial recognition cameras have been installed, further strengthening Crown Perth’s RG practices (i.e. increased detection of self-exclusion breaches).*

- *Terminals on gaming tables will be classed with a casino/gambling merchant code, giving patrons the ability to block their cards for use at a table (if their banks provide this this).*
- *One of the reasons for the phased approach is to fully understand customer behaviours etc. regarding this new technology, including seeking feedback from customers and close observation by our RG Team and Surveillance department. Depending on the outcomes of Phase 2 – additional RG measures may need to be considered.*

Is there a learning tutorial and or brochures on the roll out of DCCF?

No – given its limited initial implementation. Any brochures etc. will be considered as part of the broader rollout.

Has there been any research been done in regards to how DCCF could exacerbate gambling harm? If so what?

We understand that this type of facility is in place in a small number of tribal casinos in the United States, and is also being trialled in one casino in Nevada. We are not aware of any actual research conducted for debit card use to purchase chips at tables.

Crown is undertaking a customer survey during the first 4 weeks of Phase 2 in order to gain further insight into customer reactions to the DCCF.

If no research has been done, would Crown consider waiting for the outcome of research which is being undertaken?

This is, in part, the basis for implementing the facility in phased manner

Does Crown plan on rolling out DCCF at each gaming machine?

Crown has no plans on rolling this out at each gaming machine.

Government Interactions

When did Crown first approach the Government regarding DCCF?

There have not been any discussions with State Government or the Minister regarding the proposal.

On 7 February 2019, a formal submission was lodged with the Gaming and Wagering Commission of Western Australia. This represented the first approach to a Government agency.

As to the Minister being briefed on the proposal – this is a matter for Gaming and Wagering Commission of Western Australia.

Who did Crown discuss this with and when?

On 7 February 2019, a formal submission was lodged with the Gaming and Wagering Commission of Western Australia. This represented the first approach to a Government agency.

On 26 February 2019, a presentation on the proposal was provided to the Commission by Joshua Preston (see attached).

Were any politicians lobbied to have this approved?

No politicians were lobbied at any stage.

Did Crown offer to provide anything in return to the Government for the approval of DCCF i.e. higher gaming tax etc.?

Nothing was provided in return for approval of the proposal.

Media Response:

Crown Perth is continually assessing its customer and business needs to ensure its facilities and services reflect changing consumer behaviour.

Over the past several years, there has been a noticeable shift in our patrons use of cash and they have tended to rely solely on cashless payment methods.

In response to the shift in consumer habits and to keep pace with the demand and expectations of our patrons, Crown Perth sought and was granted approval to trial the use of Debit Card Chip Facility on table games.

Credit cards will not be allowed, and a customer must either swipe or insert their debit card. No contactless will be allowed.

This trial will include additional responsible gaming training of staff and a report will be prepared and presented to the Gaming and Wagering Commission.

Media escalation

Should the matter become public – the usual media escalation plan that is currently in place for media matters at Crown Perth should be followed.

APPENDIX D: STAFF KEY TRAINING MESSAGES & Q&A

KEY TRAINING MESSAGES

Training materials are being developed to deliver the following key messages:

Why is Crown introducing this?

- We've noticed a significant, increasing trend in our customer's use of cashless payments over recent years.
- Australia has a particularly high card usage rate, above the average for developed markets.
- In 2016, Australia was in the top 10 countries for the number of non-cash transactions, both total and per person.
- Credit and debit cards have now overtaken cash as the most frequently used method of payment in Australia.
- Cashless payment methods are currently available for current online gaming and wagering customers.
- EFTPOS on gaming tables is approved and is currently being trialled in Nevada.
- The Gaming & Wagering Commission of WA has now approved it for use in Crown Perth.
- We have an industry leading, robust RSG framework in place to manage the risk of harm minimisation with respect to the Debit Card Chip Facility.
- Crown is implementing this in a carefully considered phased approach, in order to properly assess the impact on operations and patrons, before implementing more widely across the Casino.

RSG Observable Signs

Observable Signs are seen or reported behaviours or patterns of behaviours which are potential indicators that a person may be experiencing problems with their gambling behaviours.

In respect to the Debit Card Chip Facility transactions, observations may include, but are not limited to the following:

- Declined transaction – insufficient funds message on ticket coupled with frustration/aggression or concerning comments regarding affordability;
- Customer lowers withdrawal amount when transaction declined – attempts further transaction/s for a lesser amount coupled with frustration/aggression or concerning comments regarding affordability;
- Transactions from multiple accounts – attempting to withdraw funds from multiple accounts using multiple cards coupled with frustration/aggression or concerning comments regarding affordability;
- Multiple transactions – frequent visits within close succession coupled with concerning comments regarding affordability or chasing losses;

APPENDIX D: STAFF KEY TRAINING MESSAGES & Q&A

- Request to use credit card – displays frustration/aggression at not being permitted to gamble on credit, ONLY debit card facilities available at Tables;
- Asks/confirmes whether ATMs have credit card withdrawal options – states/suggests withdraw of funds from credit card is for gambling purposes;
- Frustration/Aggression/Signs of distress - towards EFTPOS transaction, the game and/or staff; and
- Concerning comments – regarding finances or affordability, gambling behaviour or Crown's provision of this facility.

Additional Observable Signs for Gaming staff to monitor and report:

- Self-disclosure of a problem with gaming or request to self exclude;
- Requests for assistance from family and/or friends concerned about an individual's gaming behaviour;
- Gambling for long periods without a break or appears tired, over stimulated or irritable; and
- Staff witness or hear a customer was trying to borrow money for gaming.

Gaming staff that identify a customer displaying observable signs are required to report their observations to their Manager and/or the Responsible Gambling Team as soon as practicable.

The Responsible Gambling Team will record and investigate all reports. Where required the Team will approach customers displaying observable signs or unacceptable behaviour to determine if the behaviour is related to potential problem gambling. Assistance, support and referrals will be offered as required.

Potential Q&A

1. Since when have these terminals been on the tables? Is this allowed?

This has recently been approved by the Gaming & Wagering Commission of WA and is allowed. There are various restrictions in place: \$400 transaction limit, cardholder daily cash withdrawal limit, debit cards only. Crown has taken the additional step of implementing a \$500 daily limit.

2. How could Crown get approval for something like this? How could the Government let this happen?

The Commission appreciates the shift towards a cashless society – cash is being used less and less by Australians as a means of payment.

Cashless payment methods are available for online gaming and wagering.

Crown Perth also has an industry leading responsible gaming framework in place to assist anyone who may be experiencing issues with their gaming.

3. How can this be allowed in a casino when ATMs are not allowed in the casino?

ATMs are located away from the casino and in discrete areas, which means we cannot provide support for customers who are using ATMs, if needed.

The Debit Card Chip Facility allows us to observe the behaviours of individuals accessing accounts to withdraw cash for the purposes of gambling, increasing the opportunity to provide support if needed.

APPENDIX D: STAFF KEY TRAINING MESSAGES & Q&A

4. My card won't work – why won't it work?

[If it's not an obvious decline]

It is best to talk to your financial institution, but it could be because it prohibits the use of that particular card on gaming/casino transactions.

5. Can I block my card?

These transactions are classified as gaming transactions, so you can talk to your bank to request these types of transactions be blocked. Not all banks offer this, but a lot do.

This won't affect other payments at Crown – hotels, restaurants and bars are not classified as gaming.

6. How will this show up on my bank statement?

[Currently being worked through with eCash]

7. What limits are there?

There is a \$400 transaction limit, and \$500 daily limit.

8. Can I just do a few transactions in a row please?

You can do transactions up to the \$500 daily limit only.

9. It says my limit has been reached, but my purchase limit is high?

The cash withdrawal limit applies, not your purchase limit. The cash withdrawal limit is different from, and usually lower than, your purchase limit. It's usually \$1,000 - \$2,000 per day.

10. Why does it say "cash" on the terminal?

The cash withdrawal limit applies, as these transactions are being treated as a cashout not a purchase.

11. Why can't I use my credit card?

Credit card use is prohibited by the Gaming & Wagering Commission.

12. The transaction went through but the receipt did not print?

[Operational procedures for disputes and queries currently under development]

13. This is so wrong, how do I make a complaint?

You are welcome to provide feedback via the Customer Feedback Terminal located near Cotta. Alternatively I can get my Manager who can provide you with contact information for the Department of Local Government, Sport and Cultural Industries.

Note: Operationally focused questions will be developed once the final technology solution and supporting operational practices have been finalised.



AGENDA ITEM 4:
Betfair Responsible Gaming Report



SUBMISSION TO THE CROWN RESORTS RESPONSIBLE GAMBLING COMMITTEE

OVERVIEW

The following activities have been completed since the last meeting on 4 December 2019:

- Betfair is currently in the process of building a new mobile app. On 7 January 2020, Betfair's Legal Director met with the developer of the new app, and provided an overview of the various responsible gambling requirements which will need to be met. A written outline of the responsible gambling requirements was then provided to the developer on 17 January 2020;
- Betfair has continued to participate in a research project being undertaken by the Gambling Treatment & Research Clinic (based at the University of Sydney). As noted below, on 23 January 2020, in accordance with the written brief for the project, Betfair provided deidentified customer transactional data to the Gambling Treatment & Research Clinic;
- on 21 January 2020, Betfair provided a 'letter of support' to the NSW Office of Responsible Gambling, for a further responsible gambling research project which will be undertaken by Dr Robert Heirene in 2021;
- in early January 2020, Betfair's Legal Team conferred with Betfair's Marketing Team in relation to the possibility of sending responsible gambling messages via SMS (rather than email). Betfair's Marketing Team advised that, while 'costs' would be minimal (1 cent per text message), their strong preference was to continue sending responsible gambling messages via email;
- as noted below, throughout January 2020, Betfair liaised with Paddy Power Betfair Plc's (PPB's) Development Team in relation to changes that will need to be made to Betfair's desktop website, in order to comply with new responsible gambling requirements which will come into effect in late May 2020. We are currently in the process of negotiating a 'Statement of Work' with PPB.

DEVELOPMENT OF NEW MOBILE APP

Betfair is currently in the process of building a new mobile app (**New App**). It is noted that the New App will be owned and controlled by Betfair. This is in contrast to the current apps which Betfair offers to its customers, which are owned and controlled by PPB.

On 7 January 2020, Betfair's Legal Director met with the developer of the New App (RXP Services Limited), and provided an overview of the responsible gambling requirements which will need to be met (e.g. offering of deposit/loss limits, inclusion of self-exclusion and time-out functionality, inclusion of responsible gambling messaging etc.). A written outline of the responsible gambling requirements was then provided to the developer on 17 January 2020.

Once the New App is built, Betfair's Legal Team will review the New App to ensure that it complies with all responsible gambling (and legal) requirements. The New App will also need to be approved



by Betfair's regulator, the Northern Territory Racing Commission (**NTRC**), before it is offered to Betfair's customers. We expect the New App to be fully approved by mid-September 2020.

As the New App will be owned/controlled by Betfair (rather than PPB), we will have greater flexibility and there will be scope for incorporating new and improved responsible gambling functionality into the New App.

INVOLVEMENT IN RESPONSIBLE GAMBLING RESEARCH PROJECT

During October 2019, Betfair was involved in a research project being undertaken by the Gambling Treatment & Research Clinic (based at the University of Sydney).

The project involved sending different 'deposit limit' messages to selected groups of customers, and assessing which messages were most effective (i.e. in terms of getting customers to set deposit limits).

In accordance with the written brief provided by Dr Sally Gainsbury and Dr Robert Heirene from the Gambling Treatment & Research Clinic (**Project Brief**), during October 2019, Betfair selected the groups of customers and then sent various different messages to the groups.

On 23 January 2020, in accordance with the Project Brief, Betfair provided deidentified customer transactional data to the Gambling Treatment & Research Clinic, so the Clinic can assess how the relevant customers behaved after receiving the emails from Betfair (including whether they elected to set a deposit limit).

The Gambling Treatment & Research Clinic will provide Betfair with a copy of its findings in due course.

As an aside, we note that, on 21 January 2020, Betfair provided a 'letter of support' to the NSW Office of Responsible Gambling, for a further responsible gambling research project which will be undertaken by Dr Robert Heirene in 2021.

Betfair will continue to brief the NTRC and Licensing NT on its involvement in these research projects.

SENDING RESPONSIBLE GAMBLING MESSAGES VIA SMS (RATHER THAN EMAIL)

At the last Committee meeting, the Committee asked Betfair to consider whether responsible gambling messages could be sent via SMS. It is noted that Betfair normally sends such messages to its customers via email.

In early January 2020, Betfair's Legal Team conferred with Betfair's Marketing Team in relation to the possibility of sending responsible gambling messages via SMS. Betfair's Marketing Team advised that:

- while 'costs' would be minimal (1 cent per text message), their strong preference was to continue sending responsible gambling messages via email; and
- they have sent responsible gambling messages via SMS in the past, and they noticed that customers tended to 'unsubscribe' from receiving further text messages in response to receiving the responsible gambling related text message. Obviously, this is not an ideal result.



IMPLEMENTATION OF NATIONAL CONSUMER PROTECTION FRAMEWORK (NCPF) MEASURES

In late November 2018, the NCPF, which consists of 10 consumer protection measures, was formally announced.

The States/Territories have now implemented several of the consumer protection measures, including changes to deposit limit requirements and restrictions on inducements. New requirements in relation to 'customer activity statements' and 'betting account history' (**New Requirements**) will be implemented by the end of May 2020. It is likely that these New Requirements will be implemented by the NTRC through amendments to the *NT Code of Practice for Responsible Online Gambling 2019*.

Throughout January 2020, Betfair liaised with PPB's Development Team in relation to the New Requirements. PPB will make the necessary changes to Betfair's desktop website, so that Betfair fully complies with the New Requirements. We are currently in the process of negotiating a 'Statement of Work' with PPB.

The developer of the New App (discussed above) has been briefed on the New Requirements and will build the New App so that it complies with the New Requirements.

We will keep the Committee updated on the implementation of the NCPF measures. We note that we are not expecting the National Self-Exclusion Register for Online Wagering to be operational until (at the earliest) December 2020.

SENDING MARKETING MATERIAL TO PEOPLE WHO HAVE SELF-EXCLUDED FROM CROWN MELBOURNE/CROWN PERTH

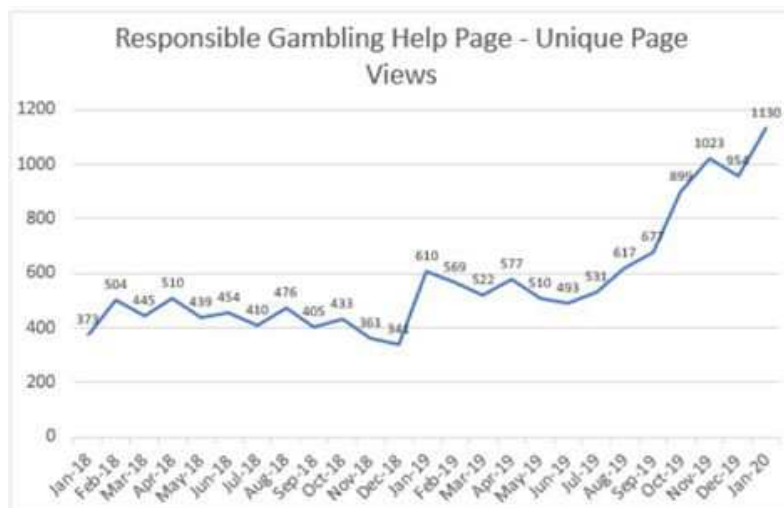
Since mid-January 2019, on a weekly basis, Crown has been sending to Betfair's Marketing Team a list of people who have self-excluded from the Crown properties (**Self-Exclusion List**). Each time the Self-Exclusion List is sent to Betfair's Marketing Team, we 'wash' the Self-Exclusion List against our customer database and identify any matches (i.e. we check to see if a person on the Self-Exclusion List has an account with Betfair). If we identify that a particular self-excluder from Crown has an account with Betfair, we cease sending any marketing/promotional material to the customer.

As at 31 January 2020, we have identified 48 matches (in total), and have ceased sending marketing/promotional material to those particular customers.



TRAFFIC VISITING BETFAIR'S RESPONSIBLE GAMBLING WEBPAGE

The below graph shows how many people have been visiting Betfair's Responsible Gambling Webpage between 1 January 2018 and 31 January 2020.



We note the number of page views for January 2019 was 610, while the number of page views for January 2020 was 1,130. Betfair heavily promoted its Responsible Gambling Webpage during the Big Bash Tournament, Magic Millions Carnival (held in early January) and the Australian Open, with links to the Webpage being included in customer correspondence and on social media channels (such as Twitter and Facebook – example below).





2019-20 Statistics

Deposit Limits

A total of 31,863 Australian/NZ Betfair customers are utilising deposit limits as of 31 January 2020, compared to 25,128 which used the tool during the 2018-19 financial year. This represents an **increase** of 26.80%. Please see the table below for further information.

Deposit Limit Breakdown by Amount

Deposit Limit	Daily	Weekly	Monthly	Yearly	Total 2019/20	Total 2018/19
Less than \$101	3,773	6,609	3,456	0	13,838	10,665
\$101 - \$500	2,611	3,997	1,561	1	8,170	6,369
\$501 - \$1000	1,292	1,782	699	0	3,773	2,984
Over \$1000	1,826	3,486	769	1	6,082	5,110

Loss Limits

A total of 9,394 Australian/NZ Betfair customers are utilising loss limits as of 31 January 2020, compared to 9,319 from 1 July 2019. Please see the table below for further information.

Loss Limit Breakdown by Amount

Loss Limit	Daily	Weekly	Monthly	Yearly	Total 2019/20	Total 2018/19
Less than \$101	127	1,859	938	376	3,300	3,294
\$101 - \$500	144	1,917	786	138	2,985	2,960
\$501 - \$1000	159	833	302	95	1,389	1,381
Over \$1000	591	781	247	101	1,720	1,684

A total of 33,307 Australian/NZ accounts are utilising either a deposit or loss limit as of 31 January 2020 (some accounts use both limit types and are represented in both tables above). This represents a total of approximately 16.3% of all of Betfair's Australian/New Zealand customers.

These tools are successfully promoting responsible gambling amongst Betfair's customers and Betfair believes these limits play a key role in mitigating any social negative consequences associated with wagering.



Self-Exclusion

A total of 1,368 Australian/NZ Betfair customers have made use of the self-exclusion functionality between 1 July 2019 and 31 January 2020.

Self-Exclusion Breakdown by State

Self-Exclusion By State	Total 2019/20*	Total 2018/19
Victoria	357	573
New South Wales	427	559
Tasmania	42	39
ACT	31	47
South Australia	79	139
Queensland	251	327
Western Australia	130	209
Northern Territory	24	14
New Zealand	27	66

*As of 31 January 2020

Time Out

A total of 662 Australian/NZ customers have made use of the timeout functionality between 1 July 2019 and 31 January 2020.

Time Out Breakdown by State

Time Out By State	Total 2019/20*	Total 2018/19
Victoria	208	376
New South Wales	194	379
Tasmania	12	37
ACT	8	41
South Australia	36	77
Queensland	123	247
Western Australia	59	144
Northern Territory	5	9
New Zealand	17	80

*As of 31 January 2020



AGENDA ITEM 5:
Australian Resorts



Australian Resorts Responsible Gaming Report

Contents

- 1. Australian Resorts Key Updates 2
- 2. Tables and Statistics 5

1. Australian Resorts Key Updates

Sixth Review of the Casino Operator and Licence, June 2018

Crown Melbourne has to date responded to ten of the 11 Responsible Gaming Recommendations (which includes Recommendation 12 in relation to Facial Recognition Technology) made by the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) in the Sixth Review of the Casino Operator and Licence, June 2018 (**s 25 Review**) within the due dates set by the VCGLR.

During the period, Crown responded to Recommendation 6, relating to staff resources and training; and Recommendations 7 and 8, relating to data analytics, including the Crown Model and Play Periods tools. Copies of Crown's response are included at Agenda Items 6.2 and 6.3.

Recommendation 9, which is described below, is the final Responsible Gaming Recommendation that Crown must respond to.

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

Crown Melbourne has commenced seeking recommendations to complete this from various parties, including the Responsible Gaming Advisory Panel (**Panel**).

Responsible Gaming Advisory Panel

The Panel, comprised of Prof. Alex Blaszczyński, Prof. Lia Nower and Prof. Paul Delfabbro, has been requested to complete a review of the Crown Resorts Responsible Gaming Framework and Strategy in line with Crown's Responsible Gaming (**RG**) vision. To this end, the Panel has been furnished with the relevant documents relating to Corporate Policies, Policies and Procedures, RG Training, RG patron documentation including RG Brochures etc. to assist. In addition, the Panel attended Crown Melbourne from 14 – 16 January 2020 to meet with senior Crown Perth and Crown Melbourne RG staff, and participated in a property tour. The outcomes of the Panel's review are expected in the coming months.

The Panel also took the opportunity whilst in Melbourne to hold its second meeting on 16 January 2020. The key considerations from the meeting included the confirmation that the Panel is a high level Committee that acts independently; the focus of the meeting was the discussions relating to the approach and preparation of the review of the Crown Resorts Responsible Gaming Framework and Strategy.

Crown Model Trial

Following the conclusion of the Crown Model Trial, the Responsible Gaming and Customer Analytics teams prepared a review report. The report formed part of the submission to the VCGLR for the Sixth Review of the Casino Operator and Licence, specifically Recommendations 7 and 8.

Crown Melbourne intends to run, as well as continue to refine and develop, the Crown Model guided by the current literature in consultation with external experts in the field, the Customer Analytics Team and the Responsible Gaming Department.

Victorian Responsible Gambling Foundation

On 31 January 2020, the Minister for Gaming and Liquor Regulation, Marlene Kairouz, announced the appointment of Tass Mousaferiadis as the new chair of the Victorian Responsible Gambling Foundation board. Mr Mousaferiadis succeeds the outgoing chair, Julie Ligeti. Board member Monique Conheady has been appointed deputy chair.

Australasian Casino Responsible Gaming Forum

Crown chaired the Australasian Casino Responsible Gaming Forum, which precedes the National Association for Gambling Studies Conference (see below) and is attended by Australasian casino executives with a responsible gaming portfolio, as well as the Australasian Gaming Council.

The Forum encourages open dialogue between all attendees, with discussion focussing on Host Responsibility/ Responsible Gaming programmes across the different jurisdictions; common issues/solutions regarding responsible gaming/host responsibility; new initiatives; and updates in the regulatory environment.

Key discussion points included the increase in Facial Recognition Technology being trialled or introduced in Australasian casinos; the introduction of a 'Guest Support Centre' at The Star Sydney (unstaffed at this stage); and the use of the terminology 'Responsible Gaming/Gambling', which other jurisdictions are reviewing, with changes to 'Safer Gambling' in the UK.

The Australasian Gaming Council (**AGC**) presented on the changes within the AGC (as briefed in a previous report), and the update on the AGC Responsible Gaming Strategy document.

Particular items of note / relevance to Crown have been discussed with the Crown Melbourne Responsible Gaming Management Committee (**RGMC**) at the December meeting, and will be discussed at the next Crown Perth RGMC meeting.

National Association for Gambling Studies (NAGS), Hobart, 4 – 6 December, 2019

The General Manager Responsible Gaming (Perth) and Group General Manager Responsible Gaming attended this conference. Presentations, papers and research updates spanned a range of topics.

The conference theme was 'Intersections: Where new technologies inform traditional practices'. Presentations and panels covered a range of information and topics. Of most interest were presentations in relation to responsible gaming staff training, self exclusion and the NSW Gambling Study.

Crown Melbourne and Crown Perth management who attended NAGS will prepare a report on key issues from the conference for distribution, including any recommendations the Panel may have.

Responsible Gaming Alignment

A process review in relation to VIP entry post Self Exclusion Revocation has been conducted over several months, including discussion and consultation with the business and a member of the Panel.

Currently Crown Perth has a 12-month period prior to access and re-entry/eligibility to access premium member rooms following successful revocation, whilst Crown Melbourne has operated with a three-month period. This results in confusion for customers across both properties, impacting service delivery and consistency.

The advice provided by the Panel member included that there is little research informing the appropriate duration in this particular area, so a principle and criteria approach is warranted. As such, in the first instance the properties align in their approach, and an evaluation will be conducted.

The VIP entry/eligibility period for both properties has now been adjusted to six months. This includes Program Play eligibility.

Responsible Gaming Operations Manager - Resignation

The Crown Melbourne Responsible Gaming Operations Manager, Leon Pillai, has resigned following 20 years of service at Crown Melbourne, of which 10 were in the Responsible Gaming Department. Recruitment has commenced for his replacement.

2. Tables and Statistics

2.1. General Property Updates

UPDATE	CROWN MELBOURNE	CROWN PERTH															
INITIATIVES AND ACTIVITIES	<ul style="list-style-type: none"> On 8 January 2020, five new VCGLR Inspectors attended the Responsible Gaming Centre for a presentation on Crown's Responsible Gaming Programs and Services. The Responsible Gambling Ministerial Advisory Council met on 6 December 2019. Discussion included the imminent formation of the Responsible Gambling Code of Conduct – non-venue Working Group, which is Crown's classification, and to which the Group General Manager Responsible Gaming has been nominated for participation. The first meeting will be held in February 2020. 	<ul style="list-style-type: none"> On 9 January 2020, the Program Manager and counsellors from Gambling Help WA attended the Responsible Gaming Centre for an overview of Crown's responsible gaming programs, the revocation process and a tour of the gaming floor. 															
REGULATORY	<ul style="list-style-type: none"> Crown's discussions with the VCGLR and VRGF in relation to the five-yearly approval of Crown's RSG Training program have continued during the reporting period. The VCGLR has requested Crown to meet a number of competencies, which are largely taken from the VRGF designed RSG training delivered to Victorian Gaming Machine Venue employees. <p>The VCGLR and VRGF have made recommendations to the initial, advanced and refresher training modules, both online and facilitator led. These recommendations have been incorporated as required and suitable. The final drafts were submitted to the VCGLR on 31 December 2019 for review.</p>	<ul style="list-style-type: none"> The following data was provided to the Gaming and Wagering Commission of WA (Commission): <table> <tr> <td>November 2019</td><td>Third Party Referrals</td><td>6</td></tr> <tr> <td></td><td>Concerning Behaviour Reports from licensed casino employees</td><td>73</td></tr> <tr> <td></td><td>Concerning Behaviour Reports from other non-licensed casino employees</td><td>2</td></tr> <tr> <td></td><td>Self Exclusion Applications</td><td>72</td></tr> <tr> <td></td><td>Self Exclusion Breaches</td><td>11</td></tr> </table>	November 2019	Third Party Referrals	6		Concerning Behaviour Reports from licensed casino employees	73		Concerning Behaviour Reports from other non-licensed casino employees	2		Self Exclusion Applications	72		Self Exclusion Breaches	11
November 2019	Third Party Referrals	6															
	Concerning Behaviour Reports from licensed casino employees	73															
	Concerning Behaviour Reports from other non-licensed casino employees	2															
	Self Exclusion Applications	72															
	Self Exclusion Breaches	11															

	Further information and updates were requested by the VCGLR in January, and these were duly submitted. The submission will be reviewed for approval by the VCGLR Commissioners at the February 2020 Commission meeting. Crown has sought to present to the Commissioners at this meeting.	December 2019	Third Party Referrals	4
			Concerning Behaviour Reports from licensed casino employees	75
			Concerning Behaviour Reports from other non-licensed casino employees	4
			Self Exclusion Applications	75
			Self Exclusion Breaches	39
		January 2020	Third Party Referrals	8
			Concerning Behaviour Reports from licensed casino employees	78
			Concerning Behaviour Reports from other non-licensed casino employees	1
			Self Exclusion Applications	58
			Self Exclusion Breaches	35
PATRON FEEDBACK / MATERIAL PATRON ISSUES	<ul style="list-style-type: none"> Feedback received in relation to Responsible Gaming Advisors (RGA) Personal Information "I thought I would drop you an email and thank you and the staff for assisting me last week. I was pleased with how easy and effective the exclusion process was. I feel really good about it and don't miss having a punt. I think it was becoming a habit." There were six comments received via the gaming floor customer comment system 'Medallia', which although not directed to the Responsible Gaming Department, the comments warranted a follow up. The follow up was achieved by a touchpoint on the customer's next visit. 	<ul style="list-style-type: none"> One – Feedback received for RGA, Personal "even though the lady at the time was flat out she made time for me" 		

INTERNAL AND OTHER AUDIT AND COMPLIANCE ACTIVITY	<ul style="list-style-type: none">Internal Audit Activity in this period consisted of the typical spot audits completed by the Gaming Audit and ongoing audits by the Responsible Gaming Teams, with no significant issues requiring follow up.	<ul style="list-style-type: none">Fortnightly audit of Responsible Gaming collateral across the casino gaming floor was carried out by Responsible Gaming staff, with no significant issues requiring follow up.
THIRD PARTY EXCLUSION	<ul style="list-style-type: none">One request received and subsequently an exclusion issued.	<ul style="list-style-type: none">Two (December)

2.2. Self Exclusion and Revocation Statistics

(a) Total Statistics (as at 31 January 2020)

TOTAL	CROWN MELBOURNE (SINCE 1994)	CROWN PERTH (SINCE 1985)
Current Self Excluded	4999	2892
Current Cross Property Self Excluded	826	826
Total Current Self Excluded	5825	3718
Total Revocations	732	802

(b) Self Exclusion Statistics (Financial Year Comparison)

	FY17		FY18		FY19		FY20#	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Self Exclusions	357	305	358	278	225	130	1	4
Joint Self Exclusions	22	11	16	9	3	5	-	-
Cross Property Self Exclusions*	-	-	-	-	215	111	327	173
Detected Self Exclusion Breaches	1621	552	2581	576	2445	603	878	378
Attempted Self-Exclusion Breaches**	-	-	93	-	599	17	649	20

*Cross Property Self Exclusion (CPSE) recorded from 1 January 2019

**Attempted breaches recorded from 7 April 2018

#to date

(c) Detected Self Exclusion Breaches (1 November 2019 – 31 January 2020)

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Total Breaches	114	49	160	73	149	60
Total Persons	76	41	117	61	97	57
Persons with Unique breaches	59	37	94	49	71	54
Persons with multiple breaches	17 persons totalling 55 breaches	4 persons totalling 12 breaches	23 persons totalling 66 breaches	12 persons totalling 24 breaches	26 persons totalling 78 breaches	3 persons totalling 6 breaches
Total attempted breaches*	91	6	102	4	95	10

*Attempted breaches recorded from 7 April 2018

(d) Revocation Statistics (Financial Year comparison)

	FY17		FY18		FY19		FY20*	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Applications Received	89	116	66	124	76	111	62	64
Applications Approved	70	88	50	102	55	81	43	48
Applications Declined	19	16	16	12	21	30	19	21

*to date

(e) Revocation Statistics (1 November 2019 – 31 January 2020)

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Applications Received	8	8	13	9	6	13
Applications Approved	7	5	9	5	4	11
Applications Declined	1	1	4	5	2	3

(f) Welfare Statistics (Financial Year comparison)

	FY17		FY18		FY19		FY20#	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Welfare WOL Issued	17	-	35	-	67	-	55	-
Welfare NRL/26.2 Banning Issued*	-	22	-	30	-	35	-	30

*Included Third Party Exclusions as at EOFY19

#to date

(g) Third Party Exclusion (Financial Year comparison)

	FY17		FY18		FY19		FY20*	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Third Party Applications Received	-	-	-	-	-	8	4	11
Third Party Applications Declined	-	-	-	-	-	0	0	0
Third Party Applications Approved	-	-	-	-	-	8	2	8
Patron Self Excluded	-	-	-	-	-	1	0	1
Ban Issued	-	-	-	-	-	4	2	6
Application Closed	-	-	-	-	-	2	0	3
Application Withdrawn by Applicant	-	-	-	-	-	1	0	0
Application Outcome Pending	-	-	-	-	-	0	2	1

*To date

(h) Time Out Statistics (1 November 2019 – 31 January 2020)

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
3-month Time Out issued	3	2	0	0	1	0
6-month Time Out issued	3	1	2	1	3	1

2.3. Unattended Children Statistics

(a) Unattended Children Statistics (Financial Year comparison)

	FY17		FY18		FY19		FY20*	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Unattended Children Incidents	64	66	75	92	91	97	69	59

*To date

(b) Unattended Children Statistics (1 November 2019 – 31 January 2020)

	NOVEMBER		DECEMBER		JANUARY	
	Melbourne	Perth	Melbourne	Perth	Melbourne	Perth
Crown Towers	0	0	2	0	5	0
Crown Metropol	0	0	0	3	2	4
Crown Promenade	0	0	0	0	1	0
Complex	2	3	13	6	7	2
Car Park	0	1	0	2	0	0
Total Incidents	2	4	15	11	15	6
Total Bans Issued*	1	2	4	4	7	1
Total Warnings Issued*	1	3	14	8	13	5
Gaming Related*	1	4	4	7	10	1
Non-Gaming Related*	1	1	14	5	10	5

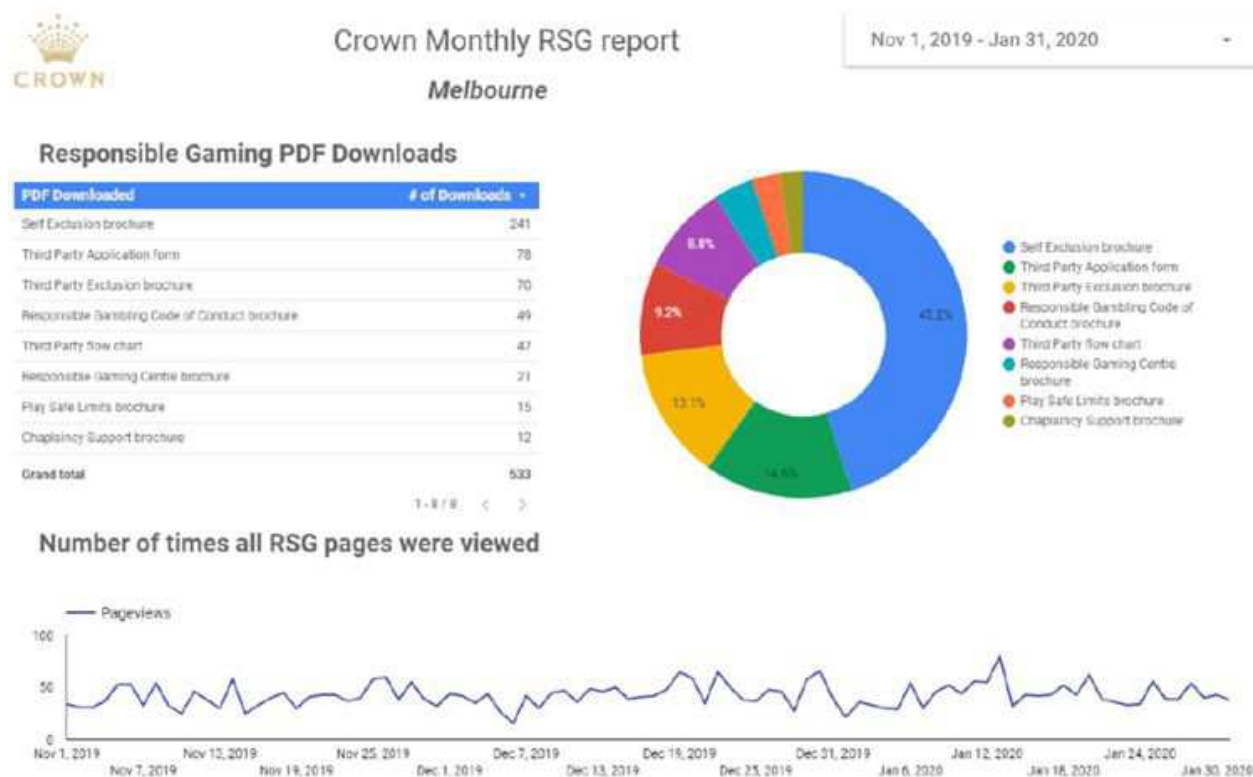
* Indicates total individuals

2.4. Training

1 November 2019 – 31 January 2020

Crown Melbourne	Crown Perth
Corporate Induction Facilitated session with 324 new employees. <ul style="list-style-type: none"> Nov: 117 employees Dec: 104 employees Jan: 103 employees 	Orientation Training Facilitated session with 237 new employees. <ul style="list-style-type: none"> Nov: 146 employees Dec: 64 employees Jan: 27 employees
Senior Manager Training Facilitated session with 51 employees. <ul style="list-style-type: none"> Nov: 22 employees Dec: 12 employees Jan: 17 employees 	Security Training Facilitated session with 13 new employees. <ul style="list-style-type: none"> Nov: 4 employees Dec: 3 employees Jan: 6 employees
Other additional Training Facilitated session with 104 employees. <ul style="list-style-type: none"> Nov: 59 employees Dec: 38 employees Jan: 7 employees 	Dealer Training Facilitated session with 28 employees. <ul style="list-style-type: none"> Nov: 10 employees Dec: 0 employees Jan: 18 employees
	VIP Training Facilitated session with 24 employees. <ul style="list-style-type: none"> Nov: 0 employees Dec: 24 employees Jan: 0 employees

Google Analytics
Responsible Gaming PDF downloads and pages viewed



5.1



Crown Monthly RSG report

Perth

Nov 1, 2019 - Jan 31, 2020

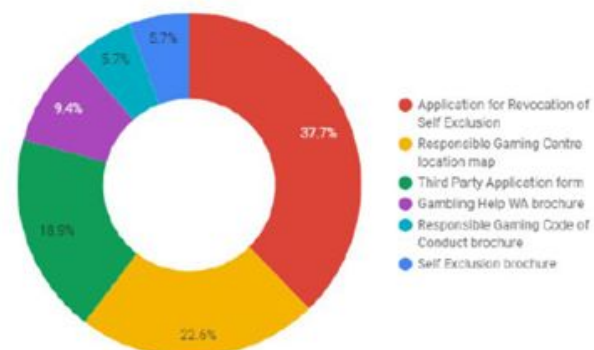
Responsible Gaming PDF Downloads

PDF Downloaded	# of Downloads
Application for Revocation of Self Exclusion	20
Responsible Gaming Centre location map	12
Third Party Application form	10
Gambling Help WA brochure	5
Responsible Gaming Code of Conduct brochure	3
Self Exclusion brochure	3

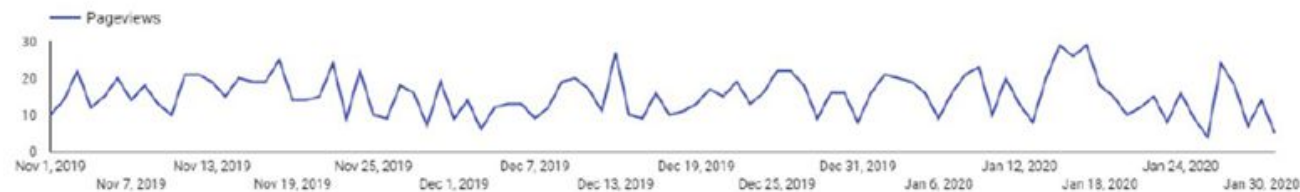
Grand total

53

1 - 6 / 6 < >



Number of times all RSG pages were viewed



5.1



Crown Melbourne Responsible Gaming

Statistic Explanation

Harm Minimisation Overview

1.1 Total Patron Contact with RGC (Responsible Gaming Centre)

This comprises all entries from the Responsible Gambling Register, which records program and service information. The Admin Services section refers to those entries that are administrative such as change of address.

1.2 Main Activities of RGC Staff

This denotes the top five activities Responsible Gaming staff engage in. Note that Facial Recognition Technology was implemented in February 2018. Additionally, changes in the Play Periods technology and process commenced from late 2018.

1.3 Services by Harm Minimisation Categories

The Responsible Gaming Operations Manager and Responsible Gaming Psychologists worked to categorise the various activities recorded in the Responsible Gambling Register. These are defined by the following harm minimisations categories:

Harm minimisation category	Main activities
Exclusion Related events	Includes Self exclusions issued, breach and attempted breach of self exclusion, Time Outs issued, Time Outs breached, Bans issued and Third Party Exclusion issued
Initiating intervention	Includes Gaming Machines, Table Games, staff interaction and Fully Automated Table Games focus, Observable signs, Exclusion/Revocation follow up
Responding to Information	Includes Self exclusion and Third Party Exclusion inquiries, Revocation information, Missing persons, Unattended Children
Service and Assistance	Includes Counselling, Chaplaincy, Counselling information, Revocation contact

Excludes Play Periods as the volumes would affect the visual representation. These are depicted in 1.2.

1.4 Referral from Crown Staff and Customers/Other

The 'Internal RG' category incorporates activities that are initiated by Responsible Gaming staff such as proactive presence on the gaming floor (includes Gaming Machines, Table Games, staff interaction and Fully Automated Table Games focus), program follow up, observable signs and welfare follow up. The other 'Internal' staff categories are referrals from gaming machines, table games, security, surveillance, hotel staff etc. 'External' referrals are mainly where customers have 'referred' themselves.

Excludes Play Periods as the volumes would affect the visual representation. These are depicted in 1.2.

1.5 External Service Providers Referred To

In these, 'Gambler's Help Facility' denotes the direct referral to the Gambler's Help offices such as Southern, City, Northern et al; 'Gambler's Help TeleServ' means the customer was referred to the 24/7 telephone counselling service; and 'Other' refers to specialised services including Chinese Peer Connection, Australian Vietnamese Women's Association, other industry Self Exclusion Programs and law enforcement (such as in the case of Missing persons).

Exclusion Related Events

Data Follow up - Relates to the conversations initiated by the Responsible Gaming Advisors on information provided by the Customer Analytics team as part of the Crown Model Trial.

Appeals Financial Year Comparison – Relates to Self Exclusion Appeals received by the VCGLR and the status, either upheld, declined or pending.

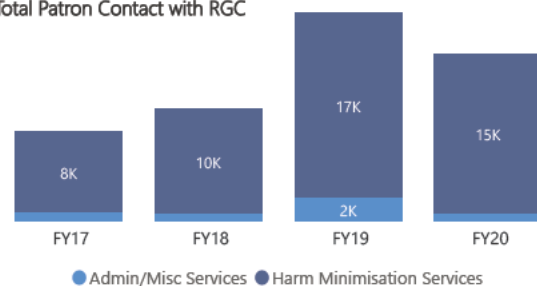
The rest of the tables are a visual representation of the data contained in Section 2.2 (Self Exclusion and Revocation Statistics) of the Australian Resorts Responsible Gaming Report.



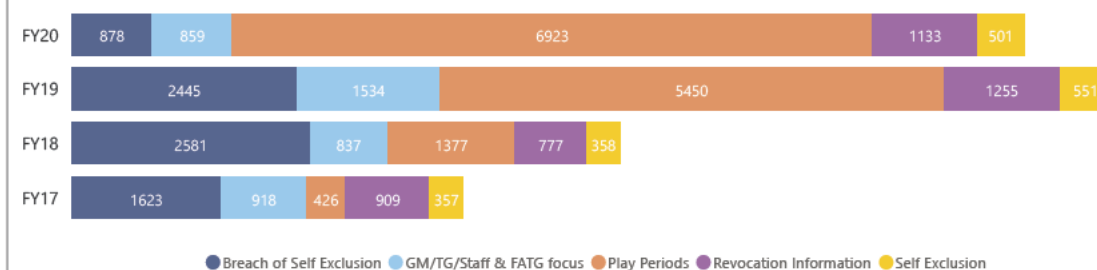
responsible gaming - Harm Minimisation Overview

AWARENESS. ASSISTANCE. SUPPORT

1.1 - Total Patron Contact with RGC

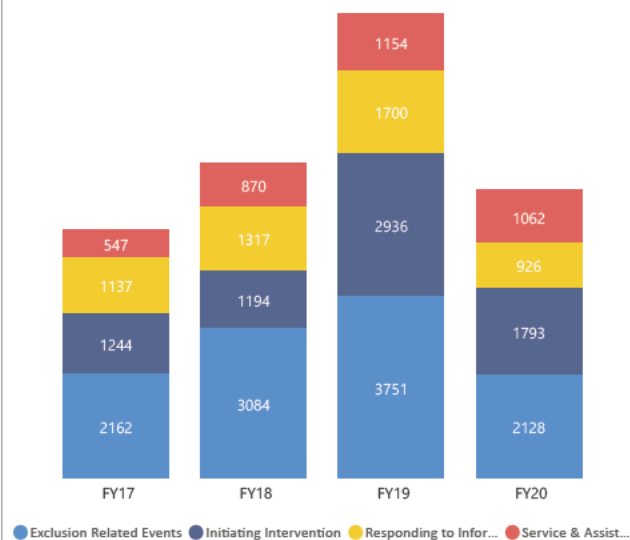


1.2 - Main Activities of RGC Staff



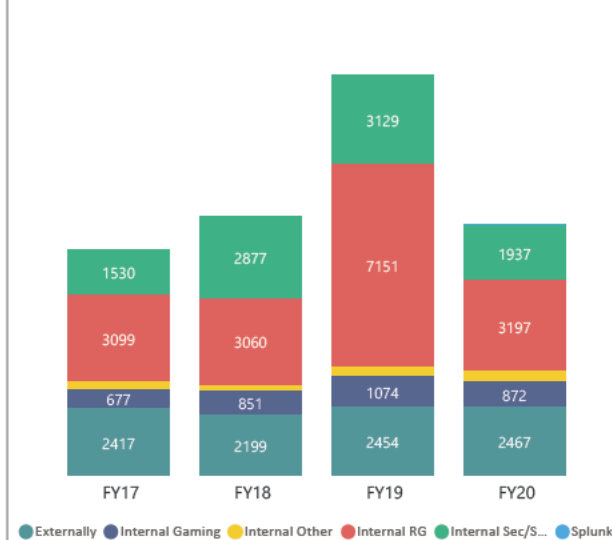
1.3 - Services By Harm Minimisation Categories

*Excludes Play Periods



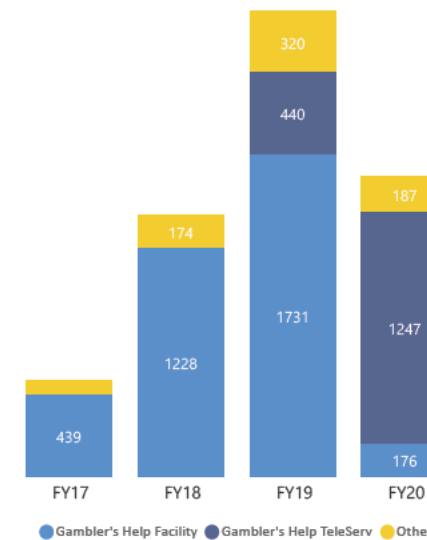
1.4 - Referrals from Crown Staff and Customers/Other

*Excludes Play Periods



1.5 - External Service Providers Referred To

*Excludes Play Periods





responsible gaming - Exclusion Related Events

AWARENESS. ASSISTANCE. SUPPORT

Total Statistics (as at 31st Jan 2020)

*Since 1994

4999*

Current Self Excluded

826

Current Cross Property Self Excluded

5825*

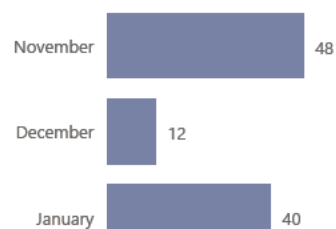
Total Current Self Excluded

732*

Total Revocations

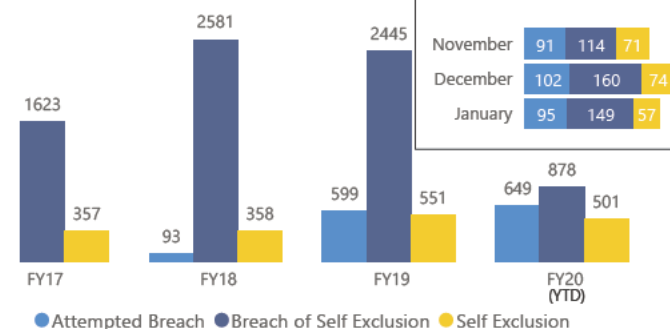
Customer Follow Up Related to Crown Model Data

Last 3 Months (FY20)

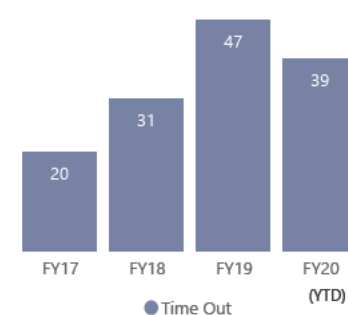


Self Exclusion Financial Year Comparison

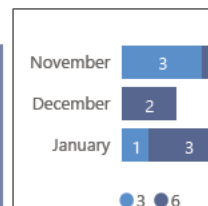
Last 3 Months (FY20)



Time Out

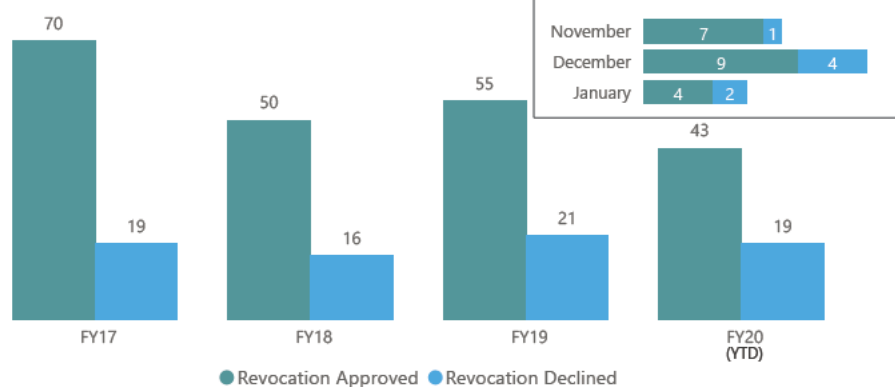


Last 3 Months - 3/6 month Timeout



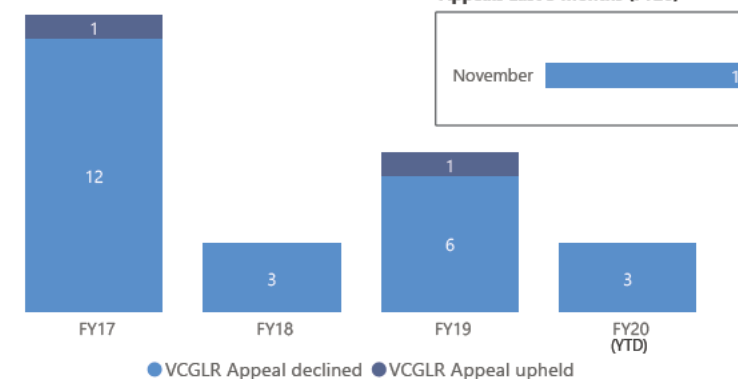
Revocation Financial Year Comparison

Revocations Last 3 Months (FY20)



Appeals Financial Year Comparison

Appeals Last 3 Months (FY20)



5.2



AGENDA ITEM 6:
Crown Melbourne Licence Review



Section 25 – Recommendations Table

At 9 January 2020

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p>Recommendation 1</p> <p>The VCGLR recommends that, by 1 January 2019, Crown develop, and submit to the VCGLR for approval, a change program to fully engage its independent directors in proactive strategic oversight of the operations of the Melbourne Casino. Particular consideration should be given to -</p> <ul style="list-style-type: none"> • formulating a charter for the Crown Melbourne board • fully documenting, for visibility to the VCGLR, the reporting and decision-making relationships between all of the boards, committees and executive meetings with responsibility for, or oversight of, Melbourne Casino functions, and • elevation of governance to the group board and committees. <p>The submission should identify any changes to regulatory frameworks and how these will be addressed.</p>	<p>Recommendation Accepted</p> <p>Crown will, in conjunction with its parent company, review its governance framework, taking into account the matters recommended by the Commission for consideration. A new framework for reporting has already been designed and is being worked through. Crown will continue to review its corporate structure moving forward with any proposed changes brought to the attention of the Commission.</p> <p>We also note that the current Crown Melbourne Framework has been considered by the Commission in times past, with some of the current structures in place as a result of regulatory obligations.</p>	<ul style="list-style-type: none"> • A submission addressing all points referenced in Recommendation 1 was submitted to the VCGLR on 24 December 2018. The submission included a Crown Melbourne Board Charter. • Although not specifically related to Recommendation 1, Crown is drafting a new updated Company Constitution, which will require the approval of the Commission in due course. 	1 January 2019	Yes	The VCGLR noted Crown's undertaking of the Recommendation by letter dated March 2019.
<p>Recommendation 2</p> <p>The VCGLR recommends that, by 1 January 2019, Crown undertake a review of the required qualifications for</p>	<p>Recommendation Accepted</p>	<ul style="list-style-type: none"> • Review undertaken and letter outlining actions taken by Crown submitted to the VCGLR on 24 December 2018. 	1 January 2019	Yes	The VCGLR noted Crown's undertaking of the Recommendation by letter dated March 2019. It was further

Printed as at 5 February 2020
Page 1

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
committee chairs set out in the charters, and ensure that the appointees' actual qualifications match.					<p>requested that Crown should undertake the same review for Crown Resorts' Committees.</p> <p>Although not a requirement of the recommendation to carry out a review of the Crown Resorts Limited Committees, Crown responded by sending two letters outlining the review of the Crown Resorts Committees on 3 June 2019.</p> <p>The VCGLR noted Crown's response to the Recommendation by letter dated 6 August 2019.</p>
<p>Recommendation 3</p> <p>The VCGLR recommends that, by 1 July 2019, Crown assess the robustness and effectiveness of its risk framework and systems, including reporting lines in the chain of command, and upgrade them where required. This assessment should be assisted by external advice.</p>	<p>Recommendation Accepted</p> <p>It should be noted that the risk framework has already been reviewed and an enhanced framework is currently being implemented, which is supported by an IT based reporting, recording and management framework.</p> <p>Also, a Group General Manager – Risk and Audit was appointed in 2017 to oversee the group function of risk and audit. Additional resources have also been committed to support the enhanced framework.</p>	<ul style="list-style-type: none"> The Group General Manager Risk & Audit has reviewed Crown's risk framework and commenced enhancements to the framework and systems in early 2018. In this respect the enhanced risk framework has started to be rolled out across the business and is being embedded into work processes and systems. A new "Risk Appetite" was presented to, and ultimately approved, in December 2018 by the relevant Crown Boards and Committees. The supporting Risk Matrix was revised, approved by the business and embedded into the risk system to ensure the capture of Risk Profile data. Risk reporting has been restructured, and organised around seven risk categories, including the development of a key risk indicator (KRI) dashboard. An external firm was engaged to carry out a review of the risk framework elements. The relevant observations provided by the external firm have been included in the Risk Management Strategy document, which was 	1 July 2019	Yes	<p>By letter dated 3 September 2019, the VCGLR deferred its consideration of the Recommendation until the Deloitte Report was provided.</p> <p>Crown sent a copy of the Deloitte Report to the VCGLR by letter dated 13 September 2019.</p> <p>On 14 October 2019, the VCGLR wrote to Crown making further enquiries as to the status of each recommendation in the Deloitte Report.</p> <p>Crown responded to the VCGLR's further enquiries by letter dated 28 October 2019.</p> <p>By email on 15 November 2019, the VCGLR queried detail of Crown's letter of 28 October 2019, which Crown responded to on 18 November 2019.</p> <p>By letter dated 9 January 2020, the VCGLR noted Crown's implementation of</p>

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>presented to the relevant Crown Boards and approved.</p> <ul style="list-style-type: none"> The risk system has been updated to reflect the updated framework elements, and implemented across Crown Melbourne. Letter outlining actions taken by Crown in accordance with the recommendation submitted to the VCGLR on 1 July 2019. A request was made by the VCGLR on 3 September 2019 for Crown to provide a copy of the Deloitte Report, which was provided on 13 September 2019. On 14 October 2019, the VCGLR emailed Crown requesting further detail on the status of each recommendation in the Deloitte Report which Crown responded to on 28 October 2019. 			Recommendation 3, also indicating that the VCGLR will monitor Crown's implementation of the three outstanding Deloitte recommendations.
<p>Recommendation 4</p> <p>The VCGLR recommends that, by 1 July 2019, Crown undertake a robust review of internal controls to ensure that Crown's regulatory and compliance department is aware of all projects and works in progress for which regulatory approvals might be relevant.</p>	<p>Recommendation Accepted</p> <p>In this respect, a new business-wide compliance framework has been designed and the roll out has commenced across the business. Further a new process has been implemented to address any proposed changes to the regulatory environment.</p>	<ul style="list-style-type: none"> A Gaming Initiatives Form was developed and implemented into processes in the business and is the key action in satisfying this recommendation; along with the new Regulatory and Compliance Requirements Policy. A submission was made for an amendment to the EGM ICS to provide for the Gaming Initiative Form – VCGLR approval has been received. Review was undertaken to determine whether additional Internal Controls are required or existing controls require amendment. Although not specifically in response to this Recommendation, a new business wide compliance framework has been developed and rolled out to the business (95% of relevant departments are now integrated into the new framework). This included the commissioning of a reporting system (known 	1 July 2019	Yes	The VCGLR noted Crown's undertaking of the Recommendation by letter dated 3 September 2019.

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>as CURA) to support the new compliance framework.</p> <ul style="list-style-type: none"> • A detailed submission on the Compliance Framework was sent to the Chairman of the Commission on 24 December 2018, related to the Blanking Buttons matter. • Review undertaken and letter outlining actions submitted to the VCGLR on 1 July 2019. • Following the review of internal controls, Crown will include a reference in relevant ICSs to Compliance being consulted prior to new initiatives being implemented (this will be done in conjunction with the changes required for Recommendation 17 once closed by the VCGLR). 			

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<u>Recommendation 5</u> <p>The VCGLR recommends that Crown convene annual roundtable sessions briefing key internal staff on the VCGLR's risk-based approach to regulation, with a particular focus on how that approach relies on the integrity of Crown's internal processes.</p>	Recommendation Accepted	<ul style="list-style-type: none"> An annual briefing will be provided to Management at the Crown Melbourne Executive Risk and Compliance Committee (ERCC) meeting on the VCGLR's risk-based approach and its impact on Crown and its processes. On 21 May 2019 the Chairman presented to the ERCC the VCGLR's risk-based approach and how it relies on the integrity of Crown's internal processes. Each member of the Committee was also provided with a copy of the VCGLR's Regulatory Approach document as well as the summary version, for future reference. The minutes of the ERCC meeting reflect that the VCGLR's Risk Based Approach was presented at this meeting (and will be annually presented thereafter). A letter outlining the actions taken by Crown was submitted to the VCGLR on 28 June 2019. 	Annual, ongoing	Yes	The VCGLR noted Crown's undertaking of the Recommendation by letter dated 29 October 2019.
<u>Recommendation 6</u> <p>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.</p>	Recommendation Accepted <p>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</p>	<ul style="list-style-type: none"> The recruitment of 5 extra Responsible Gaming Liaison Officers has been completed. There are 12 RGLOs which has assisted in having a greater presence on the gaming floor. The roles and responsibilities of RGLOs are being reviewed to accommodate new Responsible Gaming (RG) initiatives. Currently reviewing the concept of gaming staff undertaking some RG specific activities. The Gaming Machines and Table Games staff training framework has been reviewed - Crown remains of the view that the referral to expert RG staff remains a corner stone of its RG model. However, additional training for relevant gaming staff was reviewed and adjustments will be made. 	1 January 2020	Yes	Response not yet received to Crown's submission of 23 December 2019.

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<ul style="list-style-type: none"> A letter outlining the actions taken by Crown was submitted to the VCGLR on 23 December 2019. 			
<u>Recommendation 7</u> The VCGLR further recommends that Crown Melbourne use observable signs in conjunction with other harm minimisation measures such as data analytics to identify patrons at risk of being harmed from gambling.	Recommendation Accepted A new data analytics trial has commenced in relation to carded players.	<ul style="list-style-type: none"> Crown has developed a data analytics program called the "Crown Model", which has been developed from data and behaviours of former patrons who have self-excluded from Crown Melbourne. The Crown Model is designed as a predictive tool to assist in proactively identifying patrons who may be gambling in a manner which could be an indicator of potential harm. The trial of the Crown Model commenced on 25 June 2018 with operational procedures developed to respond to players of interest that are identified. The Crown Model is in its early stages with processes being adjusted as we learn from outputs. The first six month review is complete and the team is meeting regularly to discuss refinements. The 12 month trial has finished with the results being considered by the Responsible Gaming and Data Analytics team. Crown is also in the process of obtaining a separate external review of the methodology. A letter (in combination with the response to Recommendation 8) outlining the actions taken by Crown was submitted to the VCGLR on 30 December 2019. 	Ongoing	Yes	Response not yet received to Crown's submission of 30 December 2019.
<u>Recommendation 8</u> The VCGLR recommends that Crown Melbourne proceed with development and implementation of comprehensive	Recommendation Accepted As referenced above, Crown has commenced a	Rec 8(a) <ul style="list-style-type: none"> Crown Melbourne has commenced its Crown Model trial (refer Recommendation 7). 	Recommendation 8(a) 1 January 2020	8(a) submitted. 8(b) submitted for	The VCGLR noted Crown's commencement of the comprehensive study for

6.1

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p>data analytics tools for all patrons, to proactively identify for intervention patrons at risk of harm from gambling. These tools would utilise both historical data (with parameters developed from the second player model), and real-time monitoring of play periods. Crown Melbourne should look to models in other jurisdictions, and consult with external data analytics experts, with a view to implementing world-class, proactive approaches with real-time (or near-real time) operational effectiveness. In particular—</p> <p>(a) for carded play (that is, player activity which can be systematically tracked), Crown Melbourne will have in operation a comprehensive real-time player data analytics tool by 1 January 2020, and</p> <p>(b) for uncarded play (that is, all other player activity), Crown Melbourne will, by 1 January 2019, commence a comprehensive study of all the practical options for a real time player data analytics tool, with a view to reporting in detail (including legal, technical and methodological issues) to the VCGLR by 1 January 2020 and the tool being in operation by 1 July 2022.</p>	<p>data analytics trial in relation to carded players.</p> <p>Further, work will be undertaken on systems to explore and implement real-time concepts by 1 January 2020.</p> <p>Crown also supports reviewing the extent to which further data analytics tools might enhance the framework into the future. In this respect, the use and reliability of data from uncarded play is new ground for the land based gaming industry which is not yet supported by reliable research and evidence.</p> <p>Crown will commit to carrying out a study of the options available and assess and analyse the research and expert evidence available with a view to exploring appropriate tools and options available to it for uncarded play.</p>	<ul style="list-style-type: none"> Crown has commenced its review of relevant literature and other jurisdictional experiences. The “real time monitoring” of play periods is currently under consideration and development including the recent adjustment of Crown’s own “Play Periods” whereby RG, in conjunction with IT, is developing a reporting system, that identifies if a carded patron has been on the property for 12 hours or more and play has been recorded. A tool for monitoring Play Periods has been developed. A phone alert has been developed <p>Rec 8(b)</p> <ul style="list-style-type: none"> We refer to our letter dated 24 December 2018 and subsequent email correspondence with Mr Rowan Harris dated 18 January 2019. Undertaking regular meetings with Gaming senior management to discuss possible approaches. Crown has held discussions with external parties regarding possible solutions. A letter (in combination with the response to Recommendation 7) outlining the actions taken by Crown for Recommendations 8(a) and 8(b) was submitted to the VCGLR on 30 December 2019. No solution for 8(b) has yet been identified. 	<p>Recommendation 8(b)</p> <p>Commence study by 1 January 2019</p> <p>Report to the VCGLR by 1 January 2020</p> <p>Commence operation by 1 July 2022</p>	<p>1 January 2019 and 1 January 2020 requirements. 1 July 2022 requirement in progress.</p>	<p>Recommendation 8(b), by letter dated March 2019.</p> <p>Response not yet received to Crown’s submission of 30 December 2019.</p>
<u>Recommendation 9</u>	Recommendation Accepted	<ul style="list-style-type: none"> Will be progressed in due course 	1 January 2021	No	

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
The VCGLR recommends that Crown Melbourne arrange, at its expense, for an independent assessment of the real-time player data analytics tool for carded play (see Recommendation 8(a)), to be completed 12 months after implementation of the tool. The independent assessment is to be undertaken by a person approved by the VCGLR, after consultation with Crown.					
<p>Recommendation 10</p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne undertake a comprehensive review of its policy for the making and revocation of voluntary exclusion orders under section 72(2A) of the <i>Casino Control Act</i>. The comprehensive review should be undertaken in conjunction with the VCGLR, VRGF and other relevant external stakeholders. The review should be undertaken with a view to implementing policies that facilitate:</p> <ul style="list-style-type: none"> Crown Melbourne issuing short term exclusion orders for 3, 6, 12 or 24 months under section 72 of the <i>Casino Control Act</i>, 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 	Recommendation Accepted	<ul style="list-style-type: none"> Literature review completed. The VCGLR, VRGF and Crown had their first meeting on 29 November 2018 to commence discussions on this recommendation. The VCGLR, VRGF and Crown held six tripartite meetings to discuss Recommendation 10. Crown has obtained external opinion on its proposals for recommendation 10. Crown considered voluntary exclusion orders, which are more than 10 years old and determined not to revoke them. Crown has amended its Self-Exclusion Program to allow patrons to determine the number of years they will be Self-Excluded for (minimum of 12 months) and has amended its Time-Out Program to include a 3 and 6 month Agreement. A letter outlining the actions taken by Crown was submitted to the VCGLR on 28 June 2019. Further inquiries were made by the VCGLR on 16 September 2019 in relation to the benefits of the Time Out program and its 	1 July 2019	Yes	<p>On 16 September 2019, the VCGLR wrote to Crown in response to its submission, asking for further clarifying information.</p> <p>Crown responded to the VCGLR's requests on 26 September 2019.</p> <p>By letter dated 13 November 2019, the VCGLR noted Crown's undertaking of the Recommendation. The letter further requested data from Crown's 12 month trial of the Time Out Program (the provision of the data is not due).</p>

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
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.		comparison to the Exclusion Program, which were answered by Crown on 26 September 2019.			
<p><u>Recommendation 11</u></p> <p>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 <i>Casino Control Act</i> 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.</p>	Recommendation Accepted	<ul style="list-style-type: none"> The Crown Perth Third Party Exclusion (TPE) Policy and Procedure was reviewed and adjusted, in draft, to suit Crown Melbourne. The VCGLR, VRGF and Crown at their tripartite meetings (refer Recommendation 10) considered the draft TPE Policy and Procedure. At the second tripartite meeting on 18 December 2018 the VCGLR requested further material for the literature review and that Crown Melbourne provide Third Party Exclusion statistics from Crown Perth. The VCGLR also indicated that it proposed to meet with the South Australian Regulator to discuss its processes. Various versions of the TPE Program were reviewed, amended and settled by the Tripartite group. A letter outlining the actions taken by Crown was submitted to the VCGLR on 28 June 2019. Further inquiries were made by the VCGLR on 16 September 2019 in relation to the methods of contact with Crown regarding Third Party Exclusions, which were answered by Crown on 26 September 2019. 	1 July 2019	Yes	<p>On 16 September 2019, the VCGLR wrote to Crown in response to its submission, asking for further clarifying information.</p> <p>Crown responded to the VCGLR's requests on 26 September 2019.</p> <p>By letter dated 13 November 2019, the VCGLR noted Crown's undertaking of the Recommendation.</p>

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p><u>Recommendation 12</u></p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne expand facial recognition technology to cameras on all entrances to the casino and that Crown Melbourne provide written updates on a quarterly basis on its effectiveness to the VCGLR.</p>	<p><u>Recommendation Accepted</u></p> <p>Crown notes that it has already expanded its facial recognition capabilities and proposes to continue to do so in FY20.</p>	<ul style="list-style-type: none"> Facial recognition cameras are now operating on all entrances to the casino. A letter to the VCGLR confirming that all entrances to the Casino (including salons) are covered by facial recognition cameras was sent to the VCGLR on 28 May 2019 to close out the Recommendation. Crown commenced providing quarterly updates from October 2019 (which covered the period 1 July 2019 to 30 September 2019) on the effectiveness of its Facial Recognition Technology. 	<p>1 July 2019 (and ongoing quarterly reports)</p>	<p>Yes</p>	<p>On 24 June 2019 the VCGLR emailed Crown to arrange an inspection of the cameras at each entrance to ensure compliance. The audit was arranged for Wednesday 3 July 2019 and proceeded as scheduled.</p> <p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 6 August 2019.</p> <p>By email dated 22 November 2019, the VCGLR sought clarifying information regarding Crown's first provision of the Quarterly Update. The queries largely concerned whether an over-reliance on Neoface could reduce Crown's regular efforts at detecting breaches or attempted breaches. Crown responded no, as no existing processes were altered as a result of the implementation of Neoface.</p> <p>By letter dated 9 January 2020, the VCGLR noted Crown's provision of the first quarterly update, in line with Recommendation 12.</p>
<p><u>Recommendation 13</u></p> <p>The VCGLR recommends that, as part of developing a new responsible gambling strategy, by 1 July 2019, Crown Melbourne rebrand or refresh its responsible gambling messaging and publish new responsible gambling messages throughout the casino, in all Crown Melbourne publications,</p>	<p><u>Recommendation Accepted</u></p>	<ul style="list-style-type: none"> To be progressed upon finalisation of the RG Strategy (see recommendation 14). Initial drafts of new logo being developed. Marketing has been briefed regarding a refresh and a new logo has been developed – ready for internal review/approval. Strategy will be set by 1 July 2019 and roll-out will commence at that time. 	<p>1 July 2019</p>	<p>Yes</p>	<p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 3 September 2019.</p>

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
including online and social media platforms.		<ul style="list-style-type: none"> Crown finalised the new marketing design and refresh (including logo). Nomenclature changed from Responsible Gambling Support Centre to Responsible Gaming Centre and Responsible Gambling Liaison Officer to Responsible Gaming Advisors. Brochures and on-line material have been refreshed. A letter outlining the actions taken by Crown was submitted to the VCGLR on 29 June 2019. 			
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: <ul style="list-style-type: none"> (a) early proactive intervention initiatives (b) player data analytics (c) proactive engagement with pre-commitment (d) intervening with local players with continuous play based on shorter timeframes which are more reflective of responsible gambling (e) the role of all staff in minimising harm (f) the effective use and monitoring of exclusion orders (g) internal reporting arrangements (h) integrating responsible gambling into proposals for trialing or introduction of new products and equipment (i) performance measures to 	Recommendation Accepted	<ul style="list-style-type: none"> A draft strategy was prepared and ratified by the Crown Resorts Limited Responsible Gaming Committee and is being implemented. A letter outlining the actions taken by Crown was submitted to the VCGLR on 29 June 2019. 	July 2019	Yes	On 20 August 2019, the VCGLR wrote to Crown in response to its submission, asking for further clarifying information. Crown responded to the VCGLR's request on 26 August 2019. By letter dated 13 November 2019, the VCGLR noted Crown's undertaking of the Recommendation.

6.1

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
<p>assess the performance of the RGLOs, RGSC and casino staff in relation to harm minimisation</p> <p>(j) the roles of the Crown Resorts Responsible Gambling Committee and the Responsible Gambling Management Committee in driving harm prevention strategies based on world's best practice</p> <p>(k) the objectives of the RGSC in relation to minimising harm to patrons, and</p> <p>(l) the responsible service of gambling as a fundamental core business consideration when making strategic decisions regarding casino operations.</p>					
<p>Recommendation 15</p> <p>The VCGLR recommends that, within three months of implementing the new responsible gambling strategy (Recommendation 14), there is regular reporting to the Crown Resorts Responsible Gambling Committee for it to maintain oversight of Crown Melbourne's harm minimisation strategy for responsible gambling. Regular reports every two months should include numbers and types of interventions and other harm minimisation activities of RGSC and other staff, details of the number and nature of referrals to external service providers, exclusion orders, breaches, revocation and appeals, as well as results from player data analytics and other initiatives to minimise gambling related harm. These reports should also be made available to the VCGLR for monitoring purposes. (The VCGLR</p>	<p>Recommendation Accepted</p>	<ul style="list-style-type: none"> Revised reporting developed. A letter was sent to the VCGLR to close the Recommendation on 1 October 2019, notifying that reporting would commence at the next meeting of the Crown Resorts Responsible Gaming Committee, dated 9 October 2019. New reporting on statistics provided to CRL Responsible Gaming Committee. 	<p>1 October 2019</p>	<p>Yes</p>	<p>By email on 12 November 2019, the VCGLR requested a copy of the RG Report that was provided to the Crown Resorts Limited RG Committee on 9 October 2019.</p> <p>Crown provided the Report with a covering letter concerning its confidentiality, on 26 November 2019.</p> <p>By letter dated 9 January 2020, the VCGLR noted Crown's undertaking of the Recommendation, additionally requiring that each report to the CRRGC be provided to the VCGLR after each meeting and that each report include 'results from player analytics' post completion of Recommendation 8.</p>

6.1

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
intends to share this information, as appropriate, with the VRGF).					
<u>Recommendation 16</u> The VCGLR recommends that within three months of implementing the strategy, a charter is developed for the Crown Melbourne Responsible Gambling Management Committee (staff committee) which includes reference to the role and responsibility of driving a harm minimisation culture.	Recommendation Accepted	<ul style="list-style-type: none"> Management is currently reviewing all Australian Resorts RG Committees to align processes where appropriate. A Charter has been developed. A letter was sent to the VCGLR attaching the Charter to close the Recommendation off on 1 October 2019. 	1 October 2019	Yes	By letter dated 20 December 2019, the VCGLR noted Crown's undertaking of the Recommendation.
<u>Recommendation 17</u> The VCGLR recommends that, by 1 July 2019, Crown undertake a robust review (with external assistance) of relevant internal control statements, including input from AUSTRAC, to ensure that anti-money laundering risks are appropriately addressed.	Recommendation Accepted	<ul style="list-style-type: none"> Crown met with AUSTRAC to discuss this recommendation. A new joint AML Program across Crown's Australian Resorts is being developed and will be reviewed by an external party. AUSTRAC is being kept informed of progress. Internal Controls have been reviewed, preliminary discussions with AUSTRAC have taken place and draft changes have been made for management review. In addition to a review of the ICSSs, Crown also reviewed the primary tool to manage the risks associated with anti-money laundering, being the AML/CTF Program; Crown has performed an extensive review of its corporate risk management framework, ensuring its relevance and effectiveness to Crown. An extensive alignment effort was also undertaken, to ensure consistency across all key areas of the business, including the AML program. In March – May 2019, Crown conducted its annual ML/TF Risk Assessment of the designated services it provides, its delivery methods, the technology used and its customers. The ML/TF Risk Assessment 	1 July 2019	Yes	<p>On 21 August 2019, the VCGLR wrote to Crown noting its intention to conduct its own independent review of the ICSSs for risk mitigation opportunities with regard to AML (was not part of the Recommendation).</p> <p>The VCGLR noted Crown's undertaking of the Recommendation by letter dated 29 October 2019. The letter further noted again, the VCGLR's intention to conduct its own independent review of the ICSSs, with external assistance.</p>

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<p>includes a consideration of Junket Operators and Junket Players, and potential ML/TF risks arising in respect thereof.</p> <ul style="list-style-type: none"> • Crown examined all relevant Internal Control Statements and Standard Operating Procedures, in light of the ML/TF Risk Assessment above, to ensure that we reflect in the relevant ICSs, the seriousness with which Crown focuses upon, and addresses, potential ML/TF risks that might be presented by its business. • We have also had regard to the language adopted for the Internal Control Manuals in NSW, which were accepted and approved by Liquor & Gaming NSW. • We further examined ancillary documentation (policies, procedures, training) to ensure that AML risks are appropriately addressed by Crown. • Since the last update, Crown has had further conversations with AUSTRAC regarding Recommendation 17. • Crown has packaged the extensive work it has undertaken over the past 6 months and sent it to AUSTRAC during the week commencing 27 May 2019, seeking its input. • Crown also sent the packaged to an external AML expert during the week commencing 27 May 2019, seeking its input. • Crown received input/responses from both AUSTRAC and the independent expert, which it incorporated into proposed ICS changes, which will be submitted to the VCGLR for approval once their letter closing the Recommendation is received. • A letter outlining the actions taken by Crown was submitted to the VCGLR on 1 July 2019. 			

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Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<ul style="list-style-type: none"> On 21 August 2019 the VCGLR wrote to Crown requesting a copy of the expert report from Initialism Pty Ltd. Additionally, the letter noted that the VCGLR would conduct its own review of the relevant ICSs. Crown provided the Initialism Report on 28 August 2019. 			
<p>Recommendation 18</p> <p>The VCGLR recommends, in all future submissions by Crown Melbourne to the VCGLR for approvals under the <i>Casino Control Act</i> or <i>Gambling Regulation Act</i>, that Crown document:</p> <ul style="list-style-type: none"> the purpose obligations under relevant provisions of legislation, the Transaction Documents, and existing approvals what changes the grant of the approval would make to products, rules and procedures, etc risks associated with the approval and how they will be treated how responsible gambling considerations have been taken into account in the process and the measures Crown will implement to mitigate the risk of gambling related harm, and <p>which areas of Crown will be responsible for managing implementation.</p>	Recommendation Accepted	<ul style="list-style-type: none"> A new template for submissions to the VCGLR for seeking approvals was drafted and has been in use since July 2018. A letter was sent to the VCGLR to close the Recommendation off on 11 October 2019. 	Immediate effect	Yes	By letter dated 20 December 2019, the VCGLR noted Crown's undertaking of the Recommendation.
<p>Recommendation 19</p> <p>The VCGLR recommends that, by 1 July 2019, Crown Melbourne implement a policy to make an exclusion order under section 72 of the <i>Casino Control</i></p>	Recommendation Accepted Crown notes that it has had a policy in place to issue Exclusion Orders for	<ul style="list-style-type: none"> The existing 'Unacceptable Behaviour' policy statement has been reviewed and amended to strengthen the use of exclusion orders either instead of or as well as withdrawal of licences (in appropriate cases). Policy is currently 	1 July 2019	Yes	On 11 June 2019 the VCGLR wrote to Crown asking for further amendments, including explaining to staff when to issue each type of ban order (not a requirement of the Recommendation).

6.1

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
Act in appropriate cases where a person has engaged in significant unacceptable conduct in the casino or is the subject of serious criminal charges.	unacceptable behaviour for over ten years and does issue Exclusion Orders for this purpose in appropriate circumstances. Crown also notes that it issues withdrawal of licence notices to persons in appropriate circumstances, as it is entitled to do as a common law right, as those notices cover broader areas of the Crown property than the more limited area covered by Exclusion Orders.	<p>under review by management.</p> <ul style="list-style-type: none"> Management feedback has been received and the policy has been updated. A letter to the VCGLR to close out the Recommendation was sent on 27 May 2019. On 11 June 2019 the VCGLR wrote to Crown asking for further amendments, including explaining to staff when to issue each type of ban order (was not a requirement of the Recommendation). Various discussions and meetings were held between Crown and the VCGLR, including on the difficulty of amending a non-Regulated document, which operates effectively and will be amended annually. A further letter outlining Crown's policies was submitted to the VCGLR on 3 December 2019. The VCGLR made further queries of Crown and it provided amended versions of the Policies on 9 January 2020. Crown will finalise and publish the amended Policies once final noting is received from the VCGLR. 			<p>A number of meetings and correspondence on the matter have since transpired. Crown last met with the VCGLR to discuss this matter on 24 October 2019.</p> <p>The VCGLR made further queries of Crown and Crown provided amended versions of the Policies on 9 January 2020.</p>
<p><u>Recommendation 20</u></p> <p>The VCGLR recommends that, between November 2019 and March 2020, VCGLR Commissioners and directors of the Crown Resorts Board meet to review the implementation of the recommendations set out in this report.</p>	Recommendation Accepted	<ul style="list-style-type: none"> On 21 October 2019, MF called Alex Fitzpatrick (Director) requesting guidance on suitable Crown Resorts Directors to attend the meeting. Ms Fitzpatrick will consider and revert. Meeting dates and attendees have been proposed by Crown and are being reviewed by the Commission. 	Between November 2019 and March 2020	In progress	<p>On 28 October 2019 the VCGLR wrote to Crown asking for further clarifying information as to date and attendee proposals.</p> <p>Crown responded to the VCGLR on 30 October 2019 advising that it is open to any dates whereby the Commissioners and Crown Directors are available (the VCGLR proposed three dates in March)</p>

6.1

Section 25 – Timeline – Implementation of Recommendations

Recommendation	Crown's Response	Proposed Action/Progress Update	Target/Action Dates	Completed Yes/No	VCGLR Outcome
		<ul style="list-style-type: none"> 2pm 18 February has been agreed for the meeting. 			<p>and possible Directors, which was put to the Commission, however the dates were unavailable.</p> <p>The meeting was scheduled for 2pm 18 February 2020, however 12 March 2020 is now also being considered.</p>



Contact:
Direct Line:
E-mail:

Barry Felstead / Joshua Preston

Document No:

COMPLIANCE_S40934.8

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

Crown Melbourne Limited ABN 46 006 973 262

8 Whiteman Street Southbank Victoria 3006 Australia Telephone +61 3 9292 8888 Facsimile +61 3 9292 6600

crownmelbourne.com.au







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.

6.2

- 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

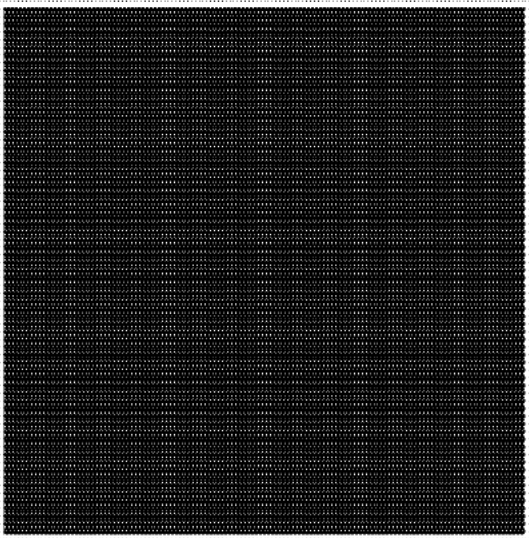


Barry Felstead
Chief Executive Officer – Australian Resorts

cc: Rowan Harris

Encl.

6.2





Contact: Barry Felstead / Joshua Preston
 Direct Line:
 E-mail:

Document No: COMPLIANCE_541410.12

30 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) - Recommendations 7 and 8

I refer to Recommendation 7 and 8 of the Sixth Review and our response dated 2 July 2018.

Recommendation 7 provides:

The VCGLR further recommends that Crown Melbourne use observable signs in conjunction with other harm minimisation measures such as data analytics to identify customers at risk of being harmed from gambling.

Recommendation 8 provides:

The VCGLR recommends that Crown Melbourne proceed with development and implementation of comprehensive data analytics tools for all patrons, to proactively identify for intervention patrons at risk of harm from gambling. These tools would utilise both historical data (with parameters developed from the second player model), and real-time monitoring of play periods. Crown Melbourne should look to models in other jurisdictions, and consult with external data analytics experts, with a view to implementing world-class, proactive approaches with real-time (or near-real time) operational effectiveness. In particular—

(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 uncarded play (that is, all other player activity), Crown Melbourne will, by 1 January 2019, commence a comprehensive study of all the practical options for a real time player data analytics tool, with a view to reporting in detail (including legal, technical and methodological issues) to the VCGLR by 1 January 2020 and the tool being in operation by 1 July 2022.

Executive Summary

In response to Recommendations 7 and 8, Crown Melbourne Limited (**Crown**) has undertaken significant work, including:

- The development of a data analytics tool for carded players (**members**), the 'Crown Model', to proactively identify opportunities for interventions with members who may be at risk of harm from their gambling. The Crown Model:
 - Utilises historical data, applying a complex algorithm, which has been refined during extensive trialing conducted over a 12 month period;
 - Appears, based on our trials, to be a more suitable tool for Crown when compared to other tools currently in use/available. Based on research undertaken, there is currently no third party technology available which meets Crown's requirements; and
 - Has been endorsed by expert Professor Alexander Blaszczyński, in terms of the work performed to date, recognising that more time and data are now needed to progress the tool further.

The Crown Model is continuing to be operated in the same manner as during the trial, and is under continued review for refinement opportunities by both the Responsible Gaming Team and the Customer Analytics Team. It is proposed that Crown will also continue to have ongoing reviews carried out on the Crown Model by external experts.

- The development of a new real-time play period monitoring tool, which provides greater accuracy in reporting, allowing intervention at 12, 20 and 24 hours of continuous play. This tool is currently in full use at Crown, in concert with observable signs.

Therefore, in relation to the monitoring of carded play, Crown now has in operation a real time play periods tool in combination with a comprehensive player data analytics tool, which it is committed to developing and monitoring, to ensure it keeps or leads pace with alternate products in the market.

Please also note that specifically with respect to Recommendation 7, Crown has continued to use observable signs as a key element to its responsible gaming framework, together with the enhancement of its Play Period monitoring tool and the Crown Model.

With respect to the monitoring of uncarded play, despite extensive research, Crown has not yet identified any tools which are currently available (and importantly, proven) to effectively monitor uncarded play in Crown's environment, with a view to intervene with patrons who may be at risk of harm from their gambling. However, there are two pieces of technology which are currently under development, which Crown will continue to monitor closely. These are:

- Anonymous Player Awareness System (**APAS**); and
- Focal Research's EGM uncarded monitoring tool.

Based on the above summary, which is articulated further below, we are of the respectful view that Recommendations 7 and 8 have been addressed to the extent possible. Notwithstanding that a tool for monitoring uncarded play has not yet been identified; and that the Crown Model will continue to be refined over a period of time; the information contained within this submission confirms the commitment that Crown has in developing and implementing tools of this nature.

Crown Model

The Crown Model is Crown's data analytics predictive data-modelling tool, developed by Crown's in-house specialist resources. In developing the tool, Crown had the benefit of engaging with officers of the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) in order to obtain their feedback, for which we are grateful. Relevant background and detail regarding the Crown Model's development is outlined below.

To seek expert review and benchmark the Crown Model, as well as identify whether there was a more effective product in the market, Crown undertook research to identify a predictive data analytics tool, which is operating in a land based casino across both table games and gaming machines.

The outcome of this research was that there is currently no entirely suitable product which satisfies Crown's following requirements for a model:

- a) Utilises predictive data analytics;
- b) Applies to a land based environment;
- c) Incorporates both Gaming Machine and Table Games play; and
- d) Discloses its algorithm for peer assessment and independent efficacy testing.

Regardless, Crown was able to use information collated from this research to assess it against the Crown Model, to ensure we were implementing a suitable, proactive and industry leading product. Some examples of the models Crown reviewed include:

- The rule-based criteria Automated Risk Monitoring System (**ARMS**), in use at SkyCity Adelaide. However, it did not fit the criteria of providing data analytics or predictive modelling and its use for Crown's purposes were therefore discounted.
- The 'Playscan' product, a responsible gaming tool developed and implemented by Svenska Spel, a state-owned company operating in the regulated gambling market in Sweden. Playscan, as described in its publicly available information, incorporates a '*probabilistic risk prediction model ... [and] analyses player data to detect signs of problematic gambling*', as well as limit setting and personalised player feedback (web based). It is mainly in use on Video Lottery Terminals in Sweden and Norway, as well as other gaming products and in France. However, there was no peer reviewed research available to confirm efficacy and Crown was unable to obtain any substantive independent indication of the usefulness of the tool.
- Focal Research, which has conducted research and developed a data analytics tool for land based carded play on Electronic Gaming Machines (**EGMs**) in Australasia.

Consultation with External Data Analytics Experts

Crown has carefully considered the research and Focal ALERT™ product, as the only entity to our knowledge conducting both research and developing tools for land based EGMs in Australasia. A number of presentations and discussions in relation to Focal's research and product offering took place throughout 2018 and 2019. This included a presentation of Focal ALERT™ to the Crown Resorts Limited Responsible Gaming Board Committee on 15 November 2018. These presentations and discussions with Focal Research were of great value to Crown, as Focal Research's use of data analytics in this area could be drawn upon when developing the Crown Model.

Although Focal Research's product, 'Focal ALERT™' is used for land based operator data analytics, it does not yet incorporate land based table games player data analytics.

We understand a report on the outcomes of a trial of a particular version of the product was issued in late December. We will review and consider the outcomes of this trial, and continue to monitor any progress in relation to the incorporation of table games play and assess its relevance to Crown.

We also note, for information purposes only, an earlier version of Focal ALERT™ was used by two provincial Canadian casinos, Casino Regina and Casino Moosejaw, Saskatchewan, Canada. Focal Research built and maintained the algorithms as part of the casinos' Responsible Gaming Programs iCare from the iView system. The algorithm was in place for nine years from 2005 but was discontinued in 2014.

In addition to the above, whilst there are a number of entities offering on-line gambling based player data analytics, none have converted to a land based product, and research has been silent on the potential cross over.

Crown will continue to monitor products in this area as they develop, with a view to benchmarking and improving the Crown Model as relevant, to ensure it is an industry leader in its class. In continuing the development of the Crown Model, Crown will continue to deploy the resources of the internal Customer Analytics Team, who are Crown's data analytics experts. The Customer Analytics Team are intimately familiar with the nature of Crown's business and members, and the data which is available for analysis.

Development of the Crown Model

In our respectful view, the development of the Crown Model, which includes both gaming machine and table games play, in the absence of a suitable market solution, was the most appropriate and effective action to take to address Recommendations 7 and 8, and most importantly, positively support our responsible gaming commitment (in conjunction with observable signs).

With helpful commentary provided by the VCGLR and the Victorian Responsible Gambling Foundation (VRGF) in terms of the baseline data, that is, largely the tracked play behaviours of members who subsequently self excluded, Crown proceeded with the development of the Crown Model.

Please find attached in **Attachment A** an outline of the development process of the Crown Model (as previously provided to the VCGLR), which included the analysis of 18 months of historical gaming data on 560 self excluded members to identify potential variables, which could be used in predictive modelling. Two-hundred variables were analysed, of which 50 were used to build the first models.

Once built, the models were subject to a validation process involving 559 self excluded members, and reached the stage where a live trial was required.

Consequently, a comprehensive trial was undertaken over a 12 month period from 25 June 2018 to 30 June 2019, in order to test and refine the effectiveness of the Crown Model. The details of the trial are articulated in **Attachment B**. Key aspects of the trial included the following:

- 9 tranches of 100 members each (ie 900 members in total) were provided to Responsible Gaming for review and action. Of these members:
 - Responsible Gaming attempted to either interact with, or observe, the members when they next returned to the casino (132 did not return, based on loyalty card usage). There were 602 members interacted with/observed, and 15 self exclusions were entered into as a result of this process. The remaining 166 members were unable to be interacted with (due to, for example, having left the casino when the RGA attended, were in a group and a private conversation was not possible etc.).
 - After interaction with Responsible Gaming, there were 258 subsequent interactions involving Responsible Gaming, relating to 76 members. These interactions were in response to play period monitoring, observable signs, welfare checks, Withdrawal of Licences, additional self exclusions, etc.
- 10 members, who had previously been interacted with, were randomly selected to complete a survey 7-8 months after their interaction, to collate qualitative data on what impact had been made. Of these 10, 3 members advised of a change in behaviour and 9 members indicated that the interaction was useful.

As has been the experience of the Focal ALERT™ product, the process and development of such a tool requires a great deal of time and agility and Crown is committed to the continued development of its tool that will assist (alongside observable signs, being a key component of our responsible gaming framework) in gambling harm minimisation.

To ensure the Crown Model was developed with the assistance of an expert, Crown consulted with Professor Alexander Blaszczyński, who was asked to review the Crown Model and comment on its merit. Upon review of the first quarter of Crown Model trial results, Professor Blaszczyński noted in May 2019 as follows:

"In summary, [Crown's] Player Data Trial shows very promising preliminary results that the predictive algorithm can identify a subset of members exhibiting problems as evidenced by repeated contact with RGLOs (Responsible Gaming Liaison Officers), and that RGLO interactions between identified members is effective in moderating gambling behaviours as assessed by changes in visits, hours and ADT (Average Daily Theoretical) as compared to the control group. As a live trial over time, the predictive algorithm can be refined as more data and information is incorporated in the statistical model."

Following review of the Crown Model Trial Report presented in **Attachment B**, Professor Blaszczyński made the following additional observations:

"I have reviewed the Crown Model Trial Report and concur with the views expressed that the development of a predictive model is dependent on the development of a large database with refinements resulting in further iterations of the Model. The Model has positive potentials...[it] represents an additional tool to assist in the identification of behavioural indicators of problem gambling."

The trial outcomes and Professor Blaszczyński's observations, albeit initial at this stage, have provided Crown with strong support that the Crown Model could be used as an additional tool to identify members who may benefit from intervention by Responsible Gaming, particularly when used in conjunction with observable signs. However, the Crown Model requires additional refinement and any machine learning product such as the Crown Model requires sufficient volumes of data and time to realise the success of the algorithm via validation and the impact an interaction may have.

Crown intends to continue to refine and develop the Crown Model guided by new literature as it becomes available, and in consultation with external experts in the field, the Customer Analytics Team and the Responsible Gaming Department. Crown will continue to run the Crown Model with periodic reports being analysed by the Responsible Gaming and Customer Analytics teams. Crown also proposes to carry out a detailed review of the Crown Model after a further 12 months of operation which will provide additional analysis and commentary on a broader data set and learnings over that extended period.

Play Periods Monitoring

Crown's real time monitoring, 'Play Periods', is a program that identifies continuous ratings without appropriate breaks during a 24 hour period. Members, using their loyalty cards and identified via Play Periods, are approached where possible by Responsible Gaming Advisors (RGAs) or Gaming Staff and reminded to take regular breaks. This program has been in place at Crown for a number of years, and was reviewed and significantly enhanced in 2018/2019.

Technology

Historically (prior to 2018), the method of identifying Play Periods was through SYCO (the loyalty program data collection system), in the form of automatically generated reports every four hours. These reports identified members who had over 12-hours of cumulative gaming activity but failed to take into account time on-site (e.g. the report would not capture a member with 11-hours of cumulative gaming activity over (for example) a 20-hour period).

In June 2018, following a review to identify more accurate technology to improve the functionality of Play Period monitoring, a program called 'Splunk' was identified as a viable option for reporting real-time Play Periods. *'Splunk is a software product that captures, indexes and correlates real time data in searchable form, from which graphs, reports, alerts, dashboards and visualisations can be generated.'*¹

After initial discussions regarding the Splunk product and a period of analysis, verification and testing was conducted. A trial dashboard was then developed as a method of identifying members who had been on-site for more than 12-hours without a substantial break, based on their loyalty card use. Operationally, the trial dashboard was cross-referenced against SYCO reports, to test against the SYCO Report baseline and identify any discrepancies.

The trial was valuable in identifying the most appropriate parameters to provide meaningful real time data outputs, which could assist the Responsible Gaming Team in appropriately identifying

¹ Obtained from Splunk website, accessed 13 November 2019, www.splunk.com/

members who had played for extended time-periods. Harm minimisation interactions were then able to follow (where possible).²

These harm minimisation interactions were purposed to inform members of their play behaviours for that period, discuss whether they have had sufficient breaks and whether they require any assistance from the Responsible Gaming Team.

In December 2018, Crown implemented the Responsible Gaming Splunk Dashboard v1.0 as the primary method for real-time monitoring of Play Periods and the existing 4-hourly automatic SYCO reports ceased.

By mid-2019, mobile Splunk alerts were implemented by Crown's IT Department, through the development of 'Webex Teams', which provided notifications to RGAs' phones, from the Splunk Dashboard. Following the success of the mobile Webex Teams notifications, the technology was further rolled out to gaming teams in late 2019.

A timeline of improvements made to Play Period reporting is shown in the below table:

Play Period Timeline	Commencement Date
Play Periods (time on device) commenced development using SYCO	July 2013
Splunk Dashboard Trial (time on site)	September 2018
Enhancement of Play Periods policy	December 2018
RSG Splunk Dashboard v1.0	December 2018
Webex Teams ³ Play Period alerts generated to PC and mobile telephones	April 2019
RSG Splunk Dashboard v2.0	August 2019
Webex Teams introduced to gaming staff to assist in monitoring Play Periods	October 2019

Interaction Policy and Process

The above mentioned improvement in technology has meant that the policy to intervene with a member has evolved, such that the more accurate Play Period reporting will result in a member being approached in the lead up to 12 hours on site (where the member's longest continuous break from gaming has been less than two hours). Previously, the manner in which the reports were generated meant that a member in this situation would be reported on and approached at 16 hours on site. This policy change occurred in December 2018.

² Limitations to approaching members included where they had left the area before staff approached, where they were in a group and couldn't be drawn out without causing embarrassment etc.

³ Webex Teams TM is an online collaborative tool that brings together messaging, file sharing *et al* to produce results faster, from the Cisco website accessed 17 November 2019 www.cisco.com

Specifically, the policy is applied as follows:

- The real time monitoring Play Periods program captures and alerts the Responsible Gaming Team based on various parameters, for example:
 - A member in the lead up to the 12-hour mark (where the member's longest continuous break was less than two hours);
 - A member in the lead up to the 14-hour mark (where the member's longest continuous break was less than three hours); etc.
- The Responsible Gaming Team then seek to undertake interactions with relevant members (either personally or through gaming staff).
- Further alerts are received and acted upon at a minimum at the 12 and 20 hour marks.
- Interactions post 20 hours, are conducted by the Responsible Gaming Team.
- Beyond 24 hours, members are asked to leave for a 24 hour period.

When developing the harm minimisation interactions, whilst cognisant of the positive outcomes that were to be expected from the enhanced real time tool, Crown took into account that some members:

- See interactions as interfering with 'their style of play';
- Actively avoid contact regarding Play Periods, i.e. not using cards at all or periodically only; and
- View RGAs as policing rather than supporting/educating.

Accordingly, careful consideration was given regarding the nature of the interaction to ensure that we had sufficient focus on the quality and timing of each intervention, which is crucial in terms of having meaning for the individual and their approach to their gaming behaviour. An intervention that occurs too early may be regarded as irrelevant by the member and there would be a loss of opportunity and impact in discussing Responsible Gaming issues. Any intervention needs to be purposeful, based on educating the member and alerting them to the potential problems associated with continued play. Knowledge and play history of members is significant, and where possible making use of this prior to any contact contributes to a meaningful, significant and targeted intervention with each member. All interactions are entered into the Responsible Gaming Register.

Uncarded Play Monitoring

As described in Crown's letter to the VCGLR, dated 24 December 2018, where Crown 'advise[d] that it has commenced its study on exploring options available to it and will be assessing and analyzing the research and expert evidence available which supports a data analytics tool on uncarded play that may enhance Crown's responsible gaming framework.', Crown has undertaken this study, the results of which are provided at **Attachment C**.

In summary, to date Crown has been unable to locate an existing practical option for a real time uncarded player data analytics tool which is suitable for Crown's environment. However:

- A recent article⁴ noted that the UK Betting and Gaming Council will introduce Artificial Intelligence technology called the Anonymous Player Awareness System (APAS). Although APAS again is only being applied to Gaming Machines, Crown will monitor its progress to determine if we can draw any learnings from it.
- Crown is aware that Focal Research is currently focusing on the development of a system that can identify gamblers of interest that are playing uncarded on an Electronic Gaming Machine. To date, no further information is available, however, Crown will continue conversations with the Focal Research team.

Crown will continue to monitor new developments and look for solutions in the market, as well as liaise with its IT Department regarding bespoke options.

Conclusion

In our respectful view, Crown has undertaken significant work in order to address Recommendations 7 and 8. For ease of reference, the table below presents Crown's response to each element of the Recommendations.

Recommendation – Key Aspects	Crown's Response
<i>Recommendation 7</i> ➤ Use observable signs in conjunction with other harm minimisation measures such as data analytics	Crown has continued to employ observable signs as part of its everyday responsible gaming practices. The Crown Model has been developed and refined over a 12 month comprehensive trial. The Crown Model is currently being used in the same manner as during the trial, in conjunction with observable signs.
<i>Recommendation 8</i> 1. Develop and implement comprehensive data analytics tools 2. Use historical data and real time monitoring of play periods 3. Research models in other jurisdictions 4. Consult with external data analytics experts	1. The Crown Model and improved Play Periods monitoring tools have been developed and/or enhanced and implemented. 2. Crown Model utilises historical data. Play Periods involves real time monitoring. 3. Research has been conducted and has not identified any suitable products. 4. Consulted with Focal Research, who are external data analytics experts, about how they were using data, which informed Crown's progress with the Crown Model.

⁴ <https://www.gamblinginsider.com/news/8186/analysis-cool-off-system-needed-trialling-before-fobt-cut>

Recommendation – Key Aspects	Crown's Response
<p>Recommendation 8(a)</p> <p>Implement a real time player data analytics tool for carded play by 1 January 2020</p>	<p>Real time monitoring is currently conducted on member Play Periods, as described above. This complements the operation of the Crown Model which, given the need to run algorithms based on historical data in order to identify a member at risk, is not real time.</p>
<p>Recommendation 8(b)</p> <ol style="list-style-type: none"> 1. Commence a comprehensive study of all practical options for real time player data analytics tools for uncarded players by 1 January 2019. 2. Report outcomes of the study by 1 January 2020. 3. Implement tool(s) by 1 July 2022. 	<ol style="list-style-type: none"> 1. The study of options for real time play data analytics tools for uncarded players commenced by 1 January 2019, as outlined in Crown's letter to the VCGLR dated 24 December 2018. 2. Outcomes to date are included in Attachment C. A suitable tool has not yet been identified. Crown will continue to monitor this. 3. The implementation of tool(s) by 1 July 2022 will be dependent on the ability to source an appropriate and effective tool prior to this date.

Please note that our response and the detail contained within it (including the attachments) **(Material)** contains confidential and commercially sensitive information. The Material is provided to the VCGLR in strict confidence for its sole and exclusive use in connection with Recommendation 7 and 8. It is the view of Crown that the Material provided is exempt from disclosure under the *Freedom of Information Act 1982* (Vic) under various sections of that Act. As such the Material must not be placed on any file, register website or database that is (or possibly is) available to the public. Please also note that Crown does not consent to the Material being disclosed to any third party whatsoever – whether under the Freedom of Information Act or otherwise – and the Material is made available strictly on this basis, and on the basis that no disclosure of the Material or any part of it be made without either receiving prior written consent from Crown or giving adequate prior notice to Crown in order that it may object to such disclosure.

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

Attachment A | Crown Model



This document and all and any information contained in it (Material) contains confidential and commercially sensitive information. The Material is provided to the Victorian Commission for Gambling and Liquor Regulation in strict confidence for its sole and exclusive use in connection with the Crown Model (player data predictive model). It is the view of Crown Melbourne Limited and Crown Resorts Limited (collectively Crown) that the Material provided is exempt from disclosure under the *Freedom of Information Act 1982* (Vic) under various sections of that Act. As such the Material must not be placed on any file, register website or database that is (or possibly is) available to the public. Crown does not consent to the Material being disclosed to any third party whatsoever – whether under the Freedom of Information Act or otherwise – and the Material is made available strictly on this basis, and on the basis that no disclosure of the Material or any part of it be made without giving adequate prior notice to Crown in order that it may object to such disclosure.

Introduction and methodology

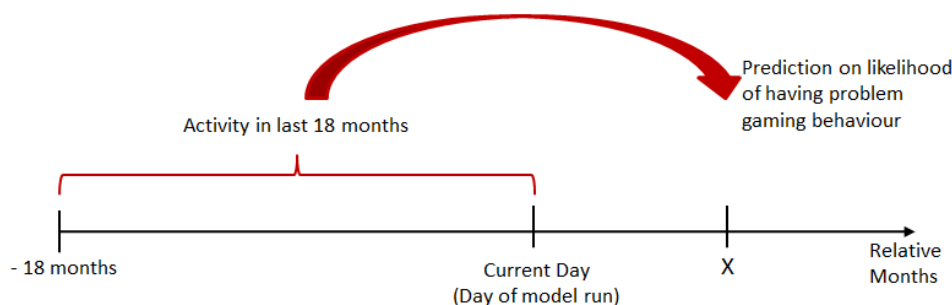
The objective of the Crown Model is to build a predictive model that identifies patrons who exhibit potential problem gaming behaviour based on data obtained from patron historic gaming activity and some demographic information.

There were a total of ~1100 self-excluded patrons between July 2012 and December 2016, which were split evenly between model build and validation.

	Model Build Dataset	Model Validation Dataset
Number of self excluded patrons	560	559
Number of randomly selected patrons from database	5,000	5,000
Total number of Patrons	5,560	5,559

Two separate models were built (Table Games and Gaming Machines) due to the different nature of the two gaming products.

A combination of patron demographics and gaming behaviour (18 months up until the point of self-exclusion) were used, and over 200 variables were analysed, out of which the 50 best were chosen to build the models. The 50 are based on machine learning algorithms which are designed to identify the best features.



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Model validation results

Model validation results show a capture between ~35% and ~52% of all self-exclusions dependent on model threshold, and also identify patrons who are potentially showing problem gaming behaviour, but did not self-exclude.

Total TG self exclusions in validation set: 418 Patrons

Model Threshold	60%	70%	80%
Correctly predicted to self exclude	219	200	175
% of self excluded patrons identified by model	52%	48%	42%
Self excluded patrons not captured by model	199	218	243
% of self excluded patrons not identified by model	48%	52%	58%
Incorrectly predicted to self exclude	27	20	10
% of patrons wrongly identified by model	11%	9%	5%

TG results at 70% model threshold:

- Model is able to identify 48% of all self-exclusions (200 out of 418)
- In total the model identified 220 patrons, of which 20 patrons did not-self exclude, but potentially displayed problem gaming behaviour

Total GM self exclusions in validation set: 141 Patrons

Model Threshold	60%	70%	80%
Correctly predicted to self exclude	73	61	50
% of self excluded patrons identified by model	52%	43%	35%
Self excluded patrons not captured by model	68	80	91
% of self excluded patrons not identified by model	48%	57%	65%
Incorrectly predicted to self exclude	28	17	7
% of patrons wrongly identified by model	28%	22%	12%

GM results at 70% model threshold:

- Model is able to identify 43% of all self-exclusions (61 out of 141)
- In total the model identified 78 patrons, of which 17 patrons did not-self exclude, but potentially displayed problem gaming behaviour

Summary

In order to validate results, time would be required (as a prediction is made regarding a future event). It is important to note that **potential** problem gaming behaviour is identified, and not everyone identified would experience problem gaming.

Building this model has been technically difficult. With more time and additional information obtained from the model run on the current active patron database, further enhancements could be made in order to increase the accuracy of predictions.

As this would be a live model trial, for best outputs continued analysis and enhancements may be required to form a final view on accuracy, usefulness and reliability.

The Crown Model would be an additional tool in the very robust Crown Melbourne Responsible Gaming framework, where observable signs are viewed as an effective means of identifying potential problem gaming behaviours and staff are trained to refer patrons who display these signs or request assistance to Responsible Gaming Liaison Officers.



Attachment B | Crown Model Trial

This document and all and any information contained in it and appended (**Material**) contains confidential and commercially sensitive information. The Material is provided to the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) in strict confidence for its sole and exclusive use in connection with its review of the Crown Model (player data predictive model). It is the view of Crown Melbourne Limited and Crown Resorts Limited (collectively **Crown**) that the Material provided is exempt from disclosure under the *Freedom of Information Act 1982* (Vic) and (Cth) and under various sections of those Acts. As such the Material must not be placed on any file, register website or database that is (or possibly is) available to the public. Crown does not consent to the Material being disclosed to any third party whatsoever – whether under the *Freedom of Information Act*[s] or otherwise – and the Material is made available strictly on this basis, and on the basis that no disclosure of the Material or any part of it be made without giving adequate prior notice to Crown in order that it may object to such disclosure.

Background

The *Fifth Review of the Casino Operator and Licence, June 2013* by the VCGLR, recommended that Crown assess the use of player data in relation to intensity, duration and frequency of play as a tool to assist in identifying problem gamblers'.¹ A trial was implemented, with the results provided to the VCGLR on 20 November 2015.

The VCGLR subsequently requested that Crown provide a presentation of the results, to the VCGLR Commissioners at the 28 April 2016 Commission meeting. At this meeting, the then Chair, Dr Bruce Cohen, provided comment that the use of loyalty program Member (**Member**) play data available for persons who subsequently self exclude, could provide the basis for predictive data modelling as a tool to assist in identifying potential problematic play in the general loyalty program Member population.

In correspondence dated 15 September 2016, the VCGLR confirmed the expectation that Crown would review the use of player data for persons who self exclude, to determine whether meaningful or common variables can be identified.

As such, Crown Melbourne's Customer Analytics Team commenced work on a predictive data modelling project entitled the 'Crown Model', using the data available from loyalty program Members in the lead up to self-exclusion. Details of this project have been discussed on several occasions with VCGLR representatives, including a VCGLR data subject matter expert, in late 2017 and early 2018.

Further, the VCGLR's *Sixth Review of the Casino Operator and Licence, June 2018* recommended:

Recommendation 7

The VCGLR further recommends that Crown Melbourne use observable signs in conjunction with other harm minimisation measures such as data analytics to identify customers at risk of being harmed from gambling.

Recommendation 8

The VCGLR recommends that Crown Melbourne proceed with development and implementation of comprehensive data analytics tools for all patrons, to proactively identify for intervention patrons at

¹ Fifth Review of the Casino Operator and Licence, Victorian Commission for Gambling and Liquor Regulation, June 2013, pg. 99



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,*
- (b) for uncarded play (that is, all other player activity), Crown Melbourne will, by 1 January 2019, commence a comprehensive study of all the practical options for a real time player data analytics tool, with a view to reporting in detail (including legal, technical and methodological issues) to the VCGLR by 1 January 2020 and the tool being in operation by 1 July 2022.*

Current Process

Apart from the Crown Model Trial, Crown's current process when identifying potential problem gambling behaviours, is via the use of observable signs commonly associated with problem gambling behaviour. These observable signs have an evidence base in research.² Crown employees are instructed to refer customers who seek assistance and/or are displaying observable signs to a Responsible Gaming Advisor (RGA). The implementation of the Crown Model Trial is viewed and utilised as an additional tool for Responsible Gaming staff.

Collection of Player Data

Crown operates a property wide loyalty program known as Crown Rewards. Members are able to earn points when playing gaming machines, table games (and their electronic versions), purchasing food and beverages, staying in the hotels and when purchasing goods and services from participating Crown Melbourne Complex (**Complex**) retailers. These points can be redeemed for goods, services and gaming play throughout the Complex.

Collection of Member gaming data activity relies on the Member using their card when gaming. As such, there are some limitations in the use of Member data from a research and analytical perspective. These limitations include:

- The Member using their card when gaming, and this may not be at all times (so an incomplete or skewed data set could be captured);
- Only the Member using their card (i.e. no card sharing);
- In terms of gaming play, the Member may also be gambling at other venues, so a complete assessment of their play behaviour is not possible; and
- Data accuracy limitations when collecting Member play data i.e. table games staff input etc.

² 'Validation study on in-venue problem gambler indicators', Thomas, A., Delfabbro, P. and Armstrong, A. (2014), Gambling Research Australia; 'Identifying Problem Gamblers in Gambling Venues', Delfabbro et al (2007) and 'Current Issues related to identifying the problem gambler in the gambling venue' various authors, Australian Gaming Council (2002).



Objective of the Crown Model Trial

To determine, by way of a 12-month trial, if the Crown Model could be utilised as an additional tool to identify loyalty program Members who may benefit from a responsible gaming intervention.

Timeline

Date	Who	Detail
11 June 2018	Responsible Gaming Team	Finalisation of operational documentation The Responsible Gaming Team received a briefing on the Crown Model Trial
14 June 2018	Crown Melbourne Responsible Gambling Management Committee	The Committee was briefed on the Crown Model Trial
18 June 2018	Customer Analytics Team	Provision of names for adding to paging (a Tranche)
25 June 2018	Responsible Gaming Team	Commencement of Crown Model Trial
July 2018 to July 2019	Customer Analytics Team and Responsible Gaming Team	Review following the completion of each Tranche

Methodology and Process

The Customer Analytics Team developed Crown Model identifiers from a review of the data of the Members in the Crown Rewards database.

For the Crown Model Trial, local Members who had used their Crown Rewards card for gaming in the prior 30 days were provided as a 'Tranche' of 100 Members.

Upon receipt of the report, a Responsible Gaming Advisor (**RGA**) placed the Member identifiers on a pager that alerted the RGA team when the Member next used their Crown Rewards card in a gaming device.

When an RGA received an alert that a Member identified on the report had inserted their Member card into a gaming device, they made every reasonable effort to attend that location.

If the Member was not in a position to be approached in a discreet manner, the RGA notated and re-attempted an approach at another time (where possible).

If a Member was able to be approached discreetly, the RGA did so and engaged in conversation.

The RGA discussed the following with the Members:

- An outline of the RGA's role;
- Asked the Member whether they were aware of the Responsible Gaming Centre services and programs;

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- Asked the Member whether they are comfortable with their level of play;
- Reminded the Member to take regular breaks; and
- Provided the Member with an RGC card if appropriate.

The interactions provided an opportunity for the RGA to deliver information about the services and programs of the Responsible Gaming Centre, consider whether there are any responsible gaming issues and take further appropriate action as required.

The interactions were recorded in the database, as well as a separate spreadsheet, which assisted in analysing the effectiveness of the trial and to also provide feedback to the Customer Analytics Team at the scheduled meetings, in order to refine the Crown Model.

Development of the Crown Model

In summary, the objective of the Crown Model is to build a predictive model that identifies patrons who exhibit potential problem gaming behaviour based on data obtained from patron historic gaming activity and some demographic information.

From the Initial Model, a sample of randomly selected Members from a pool of ~200,000 from the Crown Rewards database (meeting the criteria of at least one Table Games or Gaming Machines rating in the last 18 months) was obtained.

After review of Initial Model build, following the first Tranche of the Crown Model Trial, further refinements were made such as:

- analysing up to the last 200 visits instead of relying on a static period of 18 months;
- implementation of a new modelling algorithm (Neural Networks);³ and
- combining two separate (Table Games and Gaming Machines) models into one, to better capture any interplay between product.

Crown Model Trial Results

The Crown Model Trial as refined, commenced on 25 June 2018 and ceased 30 June 2019.

Nine Tranches were provided by the Customer Analytics team during the Trial period.

Regular meetings with the Customer Analytics Team and Responsible Gaming were held, to review progress and develop refinements based on progress.

³ Neural Networks is a modelling algorithm that aims to recognise patterns within a dataset. Over time, modelling has evolved from using simpler techniques (such as regression) to more complex algorithms such as Neural Networks or Gradient Boosting by leveraging advances in computing capacity. These algorithms can be more accurate and help identify patterns not captured by traditional modelling techniques.



Refinement continued throughout the trial period using gaming player data from persons who subsequently self excluded, as well as empirical observations garnered via conversations/interactions with Members.

On completion of the initial Tranche of Members observed/interacted with, it was found that further time was required between data collected from the observation/interaction, which was used to refine the Crown Model, and the next Tranche to be released. As such, the initial commitment to monthly meetings was reconsidered to be end of Tranche meeting, with nine Tranches completed in the Trial period.

Representatives from the Customer Analytics and Responsible Gaming Teams met post Tranche completion to discuss the Crown Model, provide feedback from staff about the Member interactions and be updated on any refinements. Information from the Customer Analytics Team is provided in **Appendix A**.

Post-Trial, Crown continued the observations/interactions, to gather the observational data, which may be useful for the next phase of Crown Model refinement.

RGA observations of the trial of the Crown Model suggested that:

- It empowers Responsible Gaming staff to take a proactive role in their duties;
- The interaction could assist Members to prevent any potential problems from escalating;
- Some Members displayed negative attitudes on being approached: defensive and suspicious of Responsible Gaming/Crown's motives;
- There were difficulties in engaging Members who play on tables or in a group, or who are higher tier Members; and
- Limitations from Members not using their own card or not using their card at all times.

It was decided to collect qualitative data from a sample of those Members who had been contacted by an RGA. The aim was to establish whether the interaction with the RGA had any impact, and if so to what effect.

RGAs were engaged to deliver a short questionnaire to be administered by way of unstructured interview, exploring whether the Member had changed their gaming behaviour; had reflected on the interaction; sought formal or informal assistance for problem gaming behaviour; and whether they had discussed the interaction with any other person.

Ten Members, who had previously been interacted with, were randomly selected and interacted with at periods between seven and eight-months post interaction.

Not all Members chose to answer all questions posed by the RGA.

Most recalled being approached by RG employees to talk about their gaming, with a modest number indicating the interaction having any effect on their gaming behaviour.

A more detailed report of the interactions is contained in **Appendix B**.

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Responsible Gaming Team Data Overview

25 June 2018 – 30 June 2019

The following describes an overview of the data collected by the Responsible Gaming Team when observing or interacting with Members who were identified via the Crown Model Trial. In terms of any previous contact recorded by the Responsible Gaming Department, histories were collected for the prior five years.

- 900 Members were provided to Responsible Gaming from the Customer Analytics team (9 Tranches each with 100 Members);
- Of these 900 Members, 149 collectively had a total of 1134 prior interactions with Responsible Gaming in the preceding five years. Of the 149, there were a minimum of six, and maximum of 28 Members with an average of 17 Members who had a prior interaction with Responsible Gaming across any of the nine Tranches;
- Of the prior interactions with Responsible Gaming from these 149 Members, the top five interactions were:
 - Play Periods - 55.8% - these are reminders of length of play or time on site;
 - Revocation Information – 7.3% - where the Member has inquired about revoking a self exclusion;
 - Welfare – 6.1% - commonly associated with observable signs or follow up when an employee or other customer has raised concerns;
 - Observable Signs – 3.4% - observable signs that were reported to or observed by RGAs;
 - Self Exclusion Information – 2.8% - where a Member has requested information about the Self Exclusion Program;
- Of note is that the bulk of the interactions related to 'Play Periods';
- Of the 900 Members, 526 were engaged and interacted with by Responsible Gaming and 76 Members were observed due to an interaction unable to take place;
- Most Members found the interaction positive, which is a testament to the skill of the RGAs, and also assists in increasing targeted harm minimisation interventions;
- 132 of the 900 Members had no recorded visitation before the Tranche concluded;
- 15 of the 900 Members have proceeded with a voluntary Self Exclusion as at 31 October 2019. Of the 15 Members, nine subsequently self excluded after an average of 155 days following an interaction, with the minimum time between the self exclusion and interaction being 23 days, and the maximum being 305 days;

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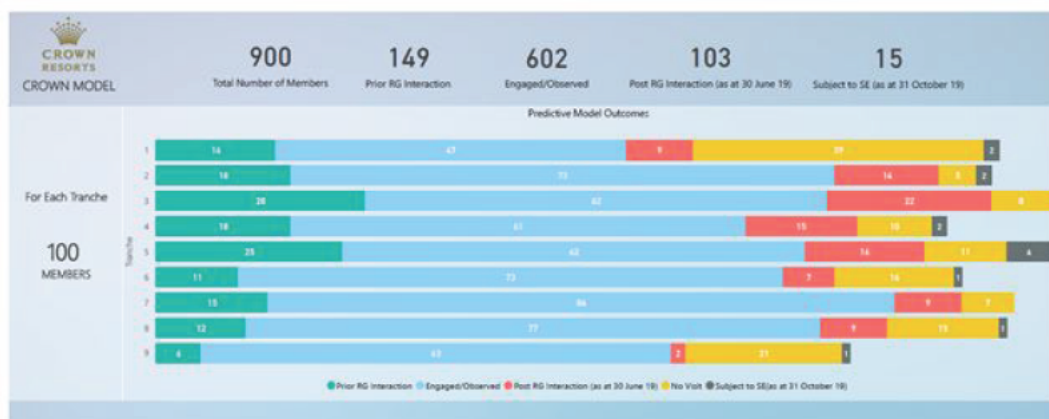


- Of the nine Members that self excluded after a follow up or observation, those that were spoken with predominantly indicated that they were not experiencing difficulties with their gambling. All Members that are subject to an interaction with an RGA as part of the Crown Model are furnished with information about responsible gaming programs and services available at Crown. This information is of interest, and will continue to inform the refinements of the Crown Model.

Table 1

Tranche	No. of Members	Prior RG interaction	Engaged/Observed	Post RG Interaction (as at 30 June 19)	No Visit	Subject to SE (as at 31 October 19)
1	100	16	47	9	39	2
2	100	18	73	14	5	2
3	100	28	62	22	8	0
4	100	18	61	15	10	2
5	100	25	62	16	11	6
6	100	11	73	7	16	1
7	100	15	84	9	7	0
8	100	12	77	9	15	1
9	100	6	63	2	21	1
Total	900	149	602	103	132	15

A visual representation of this data is provided below. When considering the above information, the Crown Model Trial has served a useful purpose in that Members who may be playing in a mode similar to persons who subsequently self exclude, appear to have been impacted by early intervention in a Member considering their play behaviour.





Crown Model Trial Conclusion

The Crown Model objective was to build a predictive model that identifies Members who exhibit potential problem gambling behaviour based on data obtained from Member historic gaming activity and some demographic information.

The purpose of the Crown Model Trial was to determine, by way of a 12-month trial, if the Crown Model can be utilised as an additional tool to identify loyalty program Members who may benefit from a responsible gaming intervention.

Data collected and reviewed during the Crown Model Trial provided encouragement to continue and refine the Model. The final combined data collected shows that an intervention appears to have made some impact on Member behaviour (see Table 1).

There were some adverse reactions to intervention by RG staff with Members. Possible unintended consequence of interactions include:

- encouraging Members to play un-carded;
- encouraging card misuse;
- inhibiting Members' help-seeking behaviour; or
- creating paranoia.

RGAs reported that the response to interactions over the past 12 months have been mixed. They reported that approximately 70% of Members were polite, although appeared uninterested in what they had to say and then ended the interaction. About 25% of Members 'brushed off' the approach and 5% of the conversations were meaningful and could take some time discussing a wide range of issues.

Some reactions may be counterproductive to the desired RG practice. As such, Crown will continue to consider the most optimal interaction strategy, including the use of other tools that will reduce perceived stigma commonly associated with responsible gaming interactions and overcoming inhibitions to help seeking.

Future Directions

The Crown Model Trial provided a good range of indicators based on data, and whilst not refined to 100% accuracy, it will assist in further refinement and building of the base. As has been part of the Crown Model Trial since inception, in order to validate results, time is required. It was noted that that when potential problem gambling behaviour is identified, it does not necessarily mean that the Member is actually engaged in problem gambling behaviours and that other factors are also equally important to consider.

A major component of assessing the success of the Crown Model continues to be time and volume of data to build the most accurate model. Any machine learning product such as the Crown Model requires sufficient volumes of data and the time to realise the success of the algorithm via validation and the impact an interaction may have.

6.3



In relation to real time data analytics predicting potential problem gambling behaviours, Crown is not aware of any land-based program that is able to achieve this result. Crown is committed, however, to develop data analytics or predictive modelling that can detect patterns of play that can provide an opportunity for early intervention with Members who may be likely to develop difficulties with gambling, and for this detection to be as close to real time as is practicable. Crown is mindful that there are limitations associated with this goal; and will additionally be continuing to review external product solutions that are research and market tested.

Crown intends to continue to refine and develop the Crown Model guided by new literature as it becomes available in consultation with external experts in the field; the Customer Analytics Team and the Responsible Gaming Department.



Appendix A | Crown Model Trial

Responsible Gaming Data

Tranche 1

25 June 2018 – 15 September 2018

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 16 have had a prior interaction with RG in the preceding five years;
- 31 of these Members were engaged with and 16 Members were observed (47);
- 39 Members had no recorded visit; and
- As at 31 October 2019, two Members from this Tranche have self excluded.

Refinements

Members from Tranche one were kept on the pager for 17 days after Tranche two went live. Of the list of 100 provided by the Customer Analytics Team, nearly half did not come in and play in the time period. The Customer Analytics Team was advised at the monthly meeting, this was resolved for the next Tranche.

As at 30 June 2019

*Fourteen unique post Responsible Gaming interactions occurred from eight Members on Tranche 1, **who were interacted with or observed:***

Attempted Breach	3
Breach of Self Exclusion	3
Play Periods	3
Revocation Follow Up	2
Revocation Information	1
Self Exclusion	2

*One unique post Responsible Gaming interaction occurred from one Member on Tranche 1 **who did not have a data follow up interaction** (as at the time the Tranche concluded):*

Play Periods	1
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Tranche 2

30 August 2018 – 14 November 2018

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 18 have had a prior interaction with RG in the preceding five years;
- 67 of these Members were engaged with and 6 Members were observed (73);
- Five Members had no recorded visit; and
- As at 31 October 2019, two Members from this Tranche have self excluded.

Refinements

Members were removed from the pager after three attempts of following up without an opportunity presented to engage. Some Members who were unable to be engaged with/observed, were followed up by Service Managers.

All Members provided have had some sort of activity (ratings) within a month before start date. The Model was revised and rebuilt after review and 100 Members selected from Model outputs, while also considering recency (staff feedback) and sampling at all tiers.

As at 30 June 2019

*Twenty-three unique post Responsible Gaming interactions occurred from 11 Members on Tranche 2, **who were interacted with or observed:***

Self Exclusion	1
Mail Suspension	1
Observable Signs	1
Play Periods	17
Seeking other Assistance	1
Self Exclusion Information	1
WOL (Withdrawal of Licence ban)	1

*Five unique post Responsible Gaming interactions occurred from three Members on Tranche 2 **who did not have a data follow up interaction** (as at the time the Tranche concluded):*

Mail Suspension	1
Play Periods	3
Self Exclusion Information	1

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Tranche 3

1 November 2018 – 6 December 2018

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 28 have had a prior interaction with RG in the preceding five years;
- 59 of these Members were engaged with and three Members were observed (62);
- Eight Members had no recorded visit;
- 49 Members were engaged with and three Members were observed by the RG team, 10 Members were engaged with by the Service Managers; and
- As at 31 October 2019, no Members from this Tranche have self excluded.

Refinements

In this Tranche, due to initial difficulty interacting with premium Members, commenced Platinum Members spoken to by Gaming staff (who were provided with briefing/script).

Customer Analytics Team changes

Customer Analytics Team comment - Same model and selection process used as for Tranche 2.

As at 30 June 2019

Seventy-eight unique post Responsible Gaming interactions occurred from 16 Members on Tranche 3, who were interacted with or observed:

WOL recommendation	2
WOL	4
Alert Notice Generated	1
Observable Signs	6
Play Periods	58
Seeking other Assistance	1
Time Out	1
Welfare	5

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Twenty-five unique post Responsible Gaming interactions occurred from six Members on Tranche 3 **who did not have a data follow up interaction (as at the time the Tranche concluded):**

Play Periods	24
Welfare	1

Tranche 4

14 December 2018 – 15 January 2019

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 18 have had a prior interaction with RG in the preceding five years;
- 53 of these Members were engaged with and eight customers were observed (61);
- 10 customers had no recorded visit;
- 51 Members were engaged with and eight Members were observed by the RG team, two Members were engaged with by the Service Managers; and
- As at 31 October 2019, two Members from this Tranche have self excluded.

Refinements

No changes from the previous Tranche.

As at 30 June 2019

Twenty-two unique post Responsible Gaming interactions occurred from five Members on Tranche 4, **who were interacted with or observed:**

Observable Signs	4
Play Periods	12
Seeking other Assistance	1
Welfare	1
WOL	3
WOL recommendation	1

Forty-nine unique post Responsible Gaming interactions occurred from 10 Members on Tranche 4, **who did not have a data follow up interaction (as at the time the Tranche concluded):**

Alert Notice Generated	1
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Breach of Self Exclusion	2
Attempted Breach	2
Observable Signs	1
Play Periods	31
Self Exclusion	2
Welfare	5
WOL	4
WOL recommendation	1

Tranche 5

17 January 2019 – 18 February 2019

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 25 have had a prior interaction with RG in the preceding five years;
- 57 of these Members were engaged with and five Members were observed (**62**);
- 11 customers had no recorded visit;
- 43 Members were engaged with and 5 customers were observed by the RG team, 14 Members were engaged with by the Service Managers; and
- As at 31 October 2019, six Members from this Tranche have self excluded.

Refinements

No changes from the previous Tranche.

As at 30 June 2019

*Thirty-three unique post Responsible Gaming interactions occurred from nine Members on Tranche 4, **who were interacted with or observed:***

3rd Party Assistance / Inquiry	1
Attempted Breach	2
Breach of Self Exclusion	7
Mail Suspension	1
Observable Signs	3

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Play Periods	13
Self Exclusion	2
Self Exclusion Information	1
Welfare	3

Sixteen Post RG interactions from Members in Tranche 7 that did not have a data follow up interaction:

Mail Suspension	1
Play Periods	9
Self Exclusion	1
Self Exclusion Information	2
Welfare	3

Tranche 6

28 February 2019 – 01 April 2019

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 11 have had a prior interaction with RG in the preceding five years;
- 62 of these Members were engaged with and 11 customers were observed (**73**);
- 16 customers had no recorded visit;
- 55 Members were engaged with and 11 customers were observed by the RG team, seven Members were engaged with by the Service Managers;
- As at 31 October 2019, one Member from this Tranche has self excluded.

Refinements

No changes from the previous Tranche.

As at 30 June 2019

*Twelve unique post Responsible Gaming interactions occurred from 7 Members on Tranche 6, **who were interacted with or observed**:*

3rd Party Assistance / Inquiry	1
Mail Suspension	2

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Play Periods	7
Seeking other Assistance	1
Self Exclusion	1

There were no Post RG interactions from Members in Tranche 6.

Tranche 7

4 April 2019 – 6 May 2019

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 15 have had a prior interaction with RG in the preceding five years;
- 76 of these Members were engaged with and eight Members were observed (**84**);
- Seven Members had no recorded visit;
- 65 Members were engaged with and eight Members were observed by the RG team, 11 Members were engaged with by the Service Managers; and
- As at 31 October 2019, no Members from this Tranche have self excluded.

Refinements

No changes from the previous Tranche.

As at 30 June 2019

*Fifty-six unique post Responsible Gaming interactions occurred from nine Members on Tranche 7, **who were interacted with or observed:***

3rd Party Assistance / Inquiry	1
Mail Suspension	3
Observable Signs	2
Play Periods	34
Seeking other Assistance	1
Self Exclusion Information	2
Self Harm	1
Time Out	1
Unpaid Parking	3

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Welfare	3
WOL	4
WOL recommendation	1

There were no Post RG interactions from Members in Tranche 7.

Tranche 8

9 May 2019 – 3 June 2019

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, 12 have had a prior interaction with RG in the preceding five years;
- 69 of these Members were engaged with and eight Members were observed (**77**);
- 15 customers had no recorded visit;
- 58 Members were engaged with and eight Members were observed by the RG team, 11 Members were engaged with by the Service Managers; and
- As at 31 October 2019, one Member from this Tranche has self excluded.

Refinements

No changes from the previous Tranche.

As at 30 June 2019

*Eighteen unique post Responsible Gaming interactions occurred from nine Members on Tranche 8, **who were interacted with or observed:***

3rd Party Assistance / Inquiry	1
Mail Suspension	1
Play Periods	14
Self Exclusion	1
Self Exclusion Information	1

There were no Post RG interactions from Members in Tranche 8.

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Tranche 9

4 June 2019 – 30 June 2019

- 100 Members were provided to Responsible Gaming from the Customer Analytics Team;
- Of these 100, six have had a prior interaction with RG in the preceding five years;
- 52 of these Members were engaged with and 11 Members were observed (63);
- 21 Members had no recorded visit;
- 48 Members were engaged with and 11 Members were observed by the RG team, four Members were engaged with by the Service Managers; and
- As at 31 October 2019, one Member from this Tranche has self excluded.

Of the six Members who had a prior interaction with RG, three had a data follow up interaction. None of these three Members had a post interaction with RG.

Refinements

No changes from the previous Tranche.

As at 30 June 2019

*Two unique post Responsible Gaming interactions occurred from two customers on Tranche 9, **who were interacted with or observed.***

Mail Suspension	1
Play Periods	1

There were no Post RG interactions from Members in Tranche 9.

All Tranches – 30 June 2019

*There were 258 unique post Responsible Gaming interactions from 76 Members from all nine Tranches, **who were interacted with or observed:***

3rd Party Assistance / Inquiry	4
Alert Notice Generated	1
Attempted Breach	5
Breach of Self Exclusion	10
Mail Suspension	9

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Observable Signs	16
Play Periods	159
Revocation Follow Up	2
Revocation Information	1
Seeking other Assistance	5
Self Exclusion	7
Self Exclusion Information	5
Self Harm	1
Time Out	2
Unpaid Parking	3
Welfare	12
WOL (Withdrawal of Licence (Ban))	12
WOL Recommendation	4

*There were 96 unique post Responsible Gaming interactions from 27 Members in all nine Tranches, **who did not have a data follow up interaction** (as at the time the Tranche concluded):*

Alert Notice Generated	1
Attempted Breach	2
Breach of Self Exclusion	2
Mail Suspension	2
Observable Signs	1
Play Periods	68
Self Exclusion	3
Self Exclusion Information	3
Welfare	9
WOL	4
WOL recommendation	1



Customer Analytics Data

Sent to RG Team	Tier	Average Total Visits			Average Hours Per Visit			Average ADT		
		30 Days Before	30 Days After	% Change	30 Days Before	30 Days After	% Change	30 Days Before	30 Days After	% Change
	Platinum	19.0	15.4	-19.1%	3.2	3.0	-6.3%	\$873	\$847	-3.0%
	Gold	16.1	12.4	-22.7%	2.3	1.9	-17.4%	\$243	\$210	-13.2%
	Silver	14.0	9.7	-30.8%	1.6	1.3	-18.8%	\$119	\$97	-18.6%
	Member	7.8	4.4	-44.0%	1.4	1.1	-21.4%	\$45	\$48	5.7%
	Total			-25.81%			-9.52%			-4.48%

Control Group	Tier	Average Total Visits			Average Hours Per Visit			Average ADT		
		30 Days Before	30 Days After	% Change	30 Days Before	30 Days After	% Change	30 Days Before	30 Days After	% Change
	Platinum	28.1	25.0	-11.2%	3.2	2.9	-9.7%	\$798	\$681	-14.8%
	Gold	29.1	24.0	-17.4%	2.0	1.7	-12.4%	\$178	\$171	-4.1%
	Silver	18.1	14.4	-20.6%	1.3	1.1	-15.3%	\$75	\$72	-3.4%
	Member	7.3	6.5	-11.0%	1.2	1.2	-0.8%	\$46	\$55	19.7%
	Total			-15.44%			-10.53%			-11.23%

- Note:
- (i) Tier represents Member's Crown Rewards level at the time of Model execution
 - (ii) ADT (Average Daily Theoretical) represents a Member's spend per visit
 - (iii) Visit, Hour and ADT metrics are calculated 30 days pre and 30 days post RG interaction for group sent to RG team
 - (iv) Visit, Hour and ADT metrics are calculated 30 days pre and 30 days post model execution date

6.3

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Appendix B | Crown Model Trial



Follow up Interview with Members who had been Previously Approached

The aim of the follow-up interview is to gain self-report data on Members' initial responses to being approached in the first instance, impact of intervention on subsequent gaming behaviour, the extent to which the approach prompted consideration of seeking formal or informal forms of assistance, and if the approach resulted in a transition to or increase in non-casino gambling formats.

The target members were those previously approached as part of the Crown Model Trial

The timing of the interview is approximately seven months post Responsible Gaming Advisor intervention as part of the Crown Model Trial. The interactions took place in November 2019.

Post Approach Evaluation

Questions posed to the randomly selected members:

1. *Do you recall being approached by a member of our staff some time ago talking to you about your gambling?*
2. *Did you feel the staff member was genuinely interested in your wellbeing?*
3. *Did you change any of your gambling behaviour after that interaction, for example:*
 - a. *How often you come here*
 - b. *How much time you spend here*
 - c. *How much money you spend*
4. *Did you speak to anyone about your gambling after the interaction? (e.g. counsellor, friends or family).*
5. *Do you think this is a useful interaction and if so would you talk to others about it.*

Record their demeanour, happy or annoyed to be approached.

Results

Ten members who were approached by staff as the result of the player data tracking were later followed up by staff to ask about their experience.

Most people recalled being approached by a staff member to talk about their gaming: Seven 'yes', two 'no' and one "not really, it was so long ago".

More than half the people approached found the staff member was genuinely interested in their wellbeing, with six members responding as 'yes', and four member responses as inconclusive as they could either not recall any or some of the interaction or chose not to comment.

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A modest number of people (three out of seven who responded to this query) indicated that the staff interaction helped change their gaming behaviour. Four people indicated no change of their gaming behaviour.

The three members who responded positively to the interaction further stated that:

"Yes, I reduced the amount of money and time I spent here."

"I came to the casino and gambled less."

"Not really but spending less now."

Three out of seven members who had a response recorded, admitted to having spoken to others about their gaming after the interaction. One of them spoke to a counsellor (whom they were already seeing about a separate matter), one talked to her mother, and the other stated that she *"told a lot to people that I got approached"*. The other four patrons reported that they did not talk to anyone.

Nine members indicated that the interaction was useful and would talk to others about it.

Interviewing staff recorded approached patrons' demeanour mostly positive - eight *"happy"*, one *"neutral"*, one *"no"* (annoyed) – *"Patron asked please leave me alone"*.

Attachment C | Crown Melbourne

Uncarded Real Time Player Data Analytics – Uncarded Play



Recommendation 8 (b)

for uncarded play (that is, all other player activity), Crown Melbourne will, by 1 January 2019, commence a comprehensive study of all the practical options for a real time player data analytics tool, with a view to reporting in detail (including legal, technical and methodological issues) to the VCGLR by 1 January 2020 and the tool being in operation by 1 July 2022.

Crown Melbourne Limited (**Crown**) refers to its letter dated 24 December 2018 to the Victorian Commission for Gaming and Liquor Regulation (**VCGLR**), 'Sixth Review of the Casino Operator and Licence (Sixth Review) – Recommendation 8 (b)'.

Crown commenced its study on exploring options available to it and has been assessing and analysing information and seeking research reports and expert evidence available, which supports data analytics tools on uncarded play that may enhance Crown's responsible gaming framework.

Research Evidence

Crown has conducted a comprehensive literature search on electronic databases including peer-reviewed articles from primary sources:

- Psychology Databases
- Public Health Databases
- Consumer Health Databases

As well as Google Scholar being used as a more general search engine. Table 1 below represents the scope of the queries undertaken.

Table 1: Result of search for relevant topics involved in strategies to track gambler's behaviour for responsible gambling purpose.

Search terms	Peer Reviewed Journals	Google Scholars
1. gambling player tracking algorithm for un-carded games	0	244
2. gambling behaviour tracking	1,956	17,200
3. gambling behaviour tracking system	1,804	41,900
4. gambling behaviour tracking algorithms	641	19,100
5. gambling behaviour tracking strategies	1,595	25,500
6. gambling player tracking algorithm	345	18,400
7. gambling player tracking system	660	54,100
8. gambling player tracking strategies	588	28,800

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Search results from peer-reviewed journals found no literature available for topics specific to tracking systems for un-carded play. Improved returns were found when the search was broadened to a more general term involving 'gambling player behaviour tracking systems/algorithms/strategies', with the results focusing on on-line gambling.

Overall, review of the literature suggested that there are generally two systems available to help track player's gambling behaviour for responsible gambling intervention purpose. These included:

1. Player Data Tracking Algorithms (**PDTA**), which can be used for carded gaming only; and
2. Tracking players' observable signs that can be used for both carded and un-carded gaming.¹

Limited research has been published in the peer-reviewed literature on these algorithms in general, and no peer-reviewed articles have directly examined their effectiveness for preventing problem gambling. This would be partly due to intellectual property issues, as the peer review process would entail releasing the algorithm itself. There has been no detected research entailing an objective measure of effectiveness and efficacy of algorithms.

Crown is aware that Focal Research is currently focusing on the development of a system that can identify gamblers of interest that are playing uncarded on an Electronic Gaming Machine (**EGM**). To date, no further information is available, however, Crown will continue conversations with the Focal Research team.

A recent article noted that the UK Betting and Gaming Council will introduce Artificial Intelligence technology called the Anonymous Player Awareness System (**APAS**). APAS is a real-time algorithm for gaming machines, which identifies areas of player behaviour that could indicate harmful play. Such behaviour will trigger an alert on-screen and force a break in play or 'cooling-off period'; simultaneously staff will be alerted, allowing for a Responsible Gambling Interaction where appropriate. Mark Griffiths, Professor of Behavioural Addiction at Nottingham Trent University told the BBC: "This is a step in the right direction but obviously needs to be monitored and evaluated. Little is known about this technology". Crown will monitor progress.

Potential Legal Issues

In terms of Legal Issues, Crown's Legal Department noted the following:

- The Privacy Act only applies to the collection and use of personal information of an identified (or identifiable) individual. For un-carded play, Crown would not generally know the identity of the individual and in any event, the purpose of the tool is to pro-actively identify for intervention, customers at risk of harm from gambling. Given that the tool would not be required to collect or use personal information of any identified individual, the *Privacy Act* would not be offended; and
- Crown's Conditions of Entry Signage to the Casino refers to both the use of surveillance and Crown's practice of the responsible service of gaming.

¹ Such as those used by Crown and defined in the Responsible Gambling Code of Conduct, pp. 16 and 17



Crown has further requested external legal advice on the matter, which identified the same issues and came to the same conclusion, this advice is attached at **Appendix (i)**. As such, there are no current known legal impediments to continuing to pursue investigations in the area of uncarded play interventions.

However, consideration must be given to the concept that tracking individuals (who have not elected to be tracked) may have ethical issues and offend some individuals' sense of civil liberties, exposing Crown and the VCGLR to public criticism. Negative public sentiment may also create a number of unintended consequences, for example:

- Patrons may change their behaviours to avoid being tracked, which may result in greater harm;
- An expectation of intervention where patron's stop managing their own behaviour;
- Stigma attached pushes patrons to gamble on line where there can be no interaction and greater harm may result; and
- Any small errors could mean that players be given false labels/diagnoses, also leading to liability and ethical concerns.

The major weakness of PDTA is the near-total lack of peer-reviewed research that directly evaluates the algorithms' effectiveness.

Potential Technical and Methodological Issues

Crown has reviewed how existing technology in use as part of casino operating systems such as Dacom² could be used to overlay a real time data analytics tool as part of the technical solution.

The current use of the Play Periods Program's technical solution, the Splunk program, will be interrogated to establish if this technology can be used in a similar manner for uncarded play.

Focal Research is currently working on a tool to be used to identify gamblers of interest who play uncarded, and Crown will continue to monitor this work.

Furthermore, Crown has commenced investigations with vendors using Artificial Intelligence and tracking persons from a play length perspective (as part of real time monitoring). The first of these is the Israeli based 'Razor Labs'³ company and again, Crown will monitor progress and developments.

Conclusion

After conducting a comprehensive study, Crown has to date not found any peer reviewed research, commercially available program or method that can be considered a real time player data analytics tool to proactively identify for intervention, uncarded customers who may be at risk of harm from gambling.

² Dacom is the Electronic Monitoring System in use for EGMs at Crown

³ <https://www.razor-labs.com/>

6.3

Crown will continue to investigate internally based solutions and externally available programs as they develop.



AGENDA ITEM 7:
Gaming Environment Scan



Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2019 and January 2020

SECTION 1: Key Information

1. Australia

A number of articles in December focused on the release of the Queensland Treasury report on gambling, highlighting the \$24.887 billion lost by Australians on gambling, a 5% increase on the previous year.

<https://www.savings.com.au/savings-accounts/australians-lose-25-billion-on-gambling-in-one-year>

The December release of the Australian Banking Association's consultation paper on the use of credit cards for gambling attracted some media. The consultation period finishes in early March 2020.

<https://www.miragenews.com/aba-calls-for-public-views-on-credit-card-use-in-gambling/>

Of interest was media relating to the Australian Human Rights Commission's draft proposals to prevent discrimination driven by artificial intelligence (AI) and intrusive facial recognition. The discussion paper proposes federal legislation requiring individuals to be informed where AI is used in a decision that affects their human rights, a general rule that whoever deploys AI is legally liable for its use, and a tort of serious invasion of privacy that would extend outside the digital arena. It also suggests a "moratorium on the potentially harmful use of facial recognition technology in Australia" until there is a legal framework to safeguard human rights.

<https://www.smh.com.au/politics/federal/very-worrying-call-for-ai-facial-recognition-reforms-to-prevent-discrimination-20191216-p53kih.html>

The Herald Sun, syndicated to further NewsCorp Australia papers, published an article relating to volumes of exclusions, including self exclusions, at Crown Melbourne: 'Gangsters and gamblers are among the 10,000 people banned from Crown casino. The ballooning list has sparked concern from anti-gambling advocates saying it is now too big for Crown to police and should be handed to the state regulator.'

<http://readnow.isentia.com/Temp/5971172/1215937593.pdf>

2. United Kingdom

A number of news articles reported the NHS Survey results, reporting on gambling activity in the UK in 2018. A total of 53% of the 5,719 adults who participated in the survey said they participated in gambling activities during 2018. This figure falls to 39% when the National Lottery is excluded. Based on the Problem Gambling Severity Index the NHS estimated that 0.4% of respondents met the criteria to be classed as problem gamblers.

<https://www.igamingbusiness.com/news/nhs-survey-more-half-english-adults-gambled-2018>



Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2019 and January 2020

Media reported on the UK Gambling Commission's consideration in relation to VIP Schemes in the UK, and the contemplation on how to react, with options including: investigating how VIP staff at gambling companies are incentivised; putting pressure on operators to draw up an industry-wide VIP code of conduct and limiting incentives on offer to scheme members. The document also lays out the option to ban VIP status.

<https://uk.news.yahoo.com/gambling-report-shows-industrys-reliance-180040685.html?guccounter=1>

3. Canada

A Canadian man is suing a casino for allegedly letting him lose more than C\$342,000 by taking advantage of his status as a compulsive gambler. Tarwinder Shokar says he lost about \$342,000 during an October 2013 trip to Caesars Windsor Resort and Casino. He is suing the casino and the Ontario Lottery and Gaming Commission for his losses, in addition to punitive damages.

<https://www.newsweek.com/casino-sued-compulsive-gambler-letting-him-lose-260000-1479307>



Crown Resorts Limited Responsible Gaming Committee Gaming Environment Scan – December 2019 and January 2020

SECTION 2: Australasian Gaming Council (AGC) Research Updates

AGC Research Update 215

National Consumer Protection Framework for Online Wagering: Baseline Study – Final Report

The Federal Department of Social Services has released the baseline study to understand the impact of the National Consumer Protection Framework on the reduction of the harm associated with online gambling in Australia. Over 5000 respondents contributed to the study, with further reviews to occur over the next five years.

AGC Research Update 216

Gambling Advertising in Australia: Consumer and Advertising Placement Research

In 2018 Australian gambling restrictions were updated. The Australian Communications and Media Authority (ACMA) monitored the operation of these new restrictions. The main aim of this research was to measure recent trends in gambling advertising and parents' experience of, and attitudes to, gambling advertising in live sport since the new rules were introduced.

AGC Research Update 217

In Control: How to Support Safer Gambling Using a Behaviour Change Approach

This research took a behaviour change approach that looked at how and why people gamble, when they do and don't enjoy it, and how they manage their gambling behaviour so it remains enjoyable and does not cause harm.



Number 215, November 2019

Key Findings of the National Consumer Protection Framework for Online Wagering: Baseline Study - Final Report

Overview

The findings of this study are the baseline for measuring the success of the National Consumer Protection Framework which has begun rolling out with the final measures due to be in place by May 2020. The effectiveness of the NCPF will be evaluated in four phases over the next five years.

Key NCPF stakeholders (such as regulators and wagering providers) were interviewed for the study to garner opinions on the efficacy of the specific ten NCPF measures and their predicted impact on reducing gambling harm from online gambling.

Method

This study of 5,076 people to have placed at least one bet online in the last 12 months was conducted by Roy Morgan Research on behalf of the AIFS (Australian Institute of Family Studies).

Participants were recruited through 11 online wagering service providers' customer databases with the survey completing the questionnaire online.

Results

Participation

- Horse Racing was clearly the most popular activity type for respondents with 75% to have placed a bet online. Sports (52.9%) was clear second with Greyhound (31.7%) and Harness (22.3%) racing the next most popular.
- Males made up 87.6% of respondents and the age group of 35-49 being the most popular.
- Unsurprisingly 83% of respondents placed a bet online via a portable device, with a desktop being reported the next most common with 40.4%.
- 82.9% of respondents reported to have placed at least one bet at home with betting a licenced venue being the next most popular location to bet online.
- Respondents reported having an average of 2.5 betting accounts, with 46% reporting having only one account.

- Almost 13% of respondents reported having opened and operated a betting account with an offshore bookmaker.
- 44% of respondents reported participating in other gambling activities in the previous 12 months:
 - 37.8% played a gaming machine.
 - 18.5% had played a casino table game.
 - 9.4% having played poker.

Gambling Group Prevalence Statistics

- On the PGSI scale the following were reported as being at risk of problem gambling:
 - 48.2% no risk
 - 24.7% low risk
 - 18.6% moderate risk
 - 8.50% problem gamblers
- Of those measured to be at risk, 76.8% of customer reported to have bet on Horse Racing and 62.2% on Sports.
- On the Gambling Harm Scale items that were included:
 - 24% reported a reduction in available spending money; and
 - 22% reported a reduction of savings.

Consumer Protection Features

- Respondents were asked whether they were aware and/or have used the available consumer protection features provided by online gambling providers:
 - 77% of reported that they had seen one or more consumer protection features and 59% reported using at least one.
 - 13.2% had set limits on how much to deposit into their account (daily, weekly, monthly limits).
 - 10.1% had set bet/spending limits.
 - 3.3% had taken a short break.
 - 2.2% had permanently excluded via the website/app.
- The survey asked respondents who had used a feature in the past 12 months about how effective they found them:
 - 42.2% found deposit limits very useful.
 - 40.5% found access to account statements very useful.

[Click here to access the full report](#)

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Number 216, January 2020

Gambling Advertising in Australia: Consumer and Advertising Placement Research

Australian Communications and Media Authority (ACMA)

2019

Background

In Australia in 2018, gambling advertising restrictions were updated. Restrictions banned advertising during play, in breaks in play and five minutes either side of the coverage of the event. These restrictions applied between 5.00 am and 8.30 pm. At other times of the day, gambling advertising was allowed during breaks and was restricted in coverage of live sport during play.

The Australian Communications and Media Authority (ACMA) monitored the operation of these new restrictions.

Aim of the Study

The main aim of this research was to measure recent trends in gambling advertising and parents' experience of, and attitudes to, gambling advertising in live sport since the new rules were introduced.

Method

1. The **qualitative** research was conducted between July and August 2018. This is when the AFL and NRL competitions were in season. This phase comprised of:
 - 13 focus groups with parents of children aged 5-17,
 - 4 paired interviews with teenagers aged 14-17, and
 - 2 mini focus groups with teenagers aged 14-15 who knew each other.
2. The **quantitative** research was conducted in October 2018 (the 3 week period immediately after the AFL and NRL grand finals). It involved computer-assisted telephone interviews with 1,507 Australians aged 18 or over who care for a child (0-17) at least part time.
3. **Nielson Ad Intel** is a service that uses spot monitoring to quantify the number of advertising spots on broadcasting and online platforms. It provided detailed breakdowns on when, where and

how many ads were placed. It also detailed the mediums used and how much was spent. This is done by campaign, by key industry sector, by individual advertiser and by ad formats. Two reference periods were used – one before and one after the new restrictions came into effect.

Results

The volume of gambling advertisements broadcast during live sport and during pre- and post-game coverage markedly decreased

For the majority of sporting events examined, there was a decrease in the total volume of advertising e.g. there was a 96% reduction in gambling ads between 5am and 8.30pm on metro television during the 2019 Australian Open compared to 2018.

There was a shift in gambling advertising to later times

Gambling advertising after 8.30 pm increased 131% between the 2017 and 2018 AFL home and away seasons.

Gambling advertising during breaks in play, after 8.30 pm, during the 2018 NRL season increased by 25% from the previous year.

There has been an increase in gambling advertising in non-sports content

There has been an increase in gambling ads on TV and radio in general. The study found that the total volume of gambling advertising on Australian radio and TV increased by 50% between 2016-17 and 2018-19. These increases largely appeared from 6 pm to 10 pm. The general increase in gambling advertising reflects broader trends in growth of ad spending in Australia.

Digital gambling advertising impressions remained stable

'Impressions' are the number of times an advertisement is served to a user's screen - regardless of whether it is clicked on or not.

Between 2016 and 2017, impressions decreased significantly (42%). Between 2017 and 2018 they remained stable (decreased only 1%), following the introduction of online restrictions.

Low level of awareness of the new restrictions

84% of parents indicated they were not aware of the restrictions during live sport. 14% were aware of the television restrictions and 5% were aware of the online and radio restrictions.

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Research Update

January 2020

7

"No, I don't think there's any regulations, not around gambling." *Parent Group*

"I would assume that, obviously because they always say Please gamble responsibly" *Parent Group*

"I think they have to say gamble responsibly" *Teen Group*

New restrictions are welcome, although concerns were raised about application

Restrictions were regarded as a step in the right direction. However, concerns were raised about the effectiveness of the regulations and the challenges of enforcing them. The restrictions on advertising 5 minutes before and after live play were seen as insufficient. This was due to the fact that children often watch the pre-match build up or post-match review.

"I think any development is a good development. It's heading in the right direction." *Parent Group*

"But it certainly doesn't prevent the exposure to it. It's still hard to control it across all the different channels." *Parent Group*

"And it almost feels like it's been industry-led" *Parent Group*

"You can easily see an ad 10 minutes before the game and think – hey the game is on tonight, let's gamble – so it should be like an hour." *Teen Group*

Some parents mentioned that time restrictions for advertising during live sport could result in an overflow of gambling advertising before and after the games, moving to other times when children could be viewing.

Parents were bothered when their children are exposed to gambling advertising and this concern is greater for older children

62% of parents were bothered by gambling advertising. 73% were bothered by their children being exposed to this advertising. Parents with teenagers were significantly more likely to be bothered 'a lot' (34%) or 'a fair amount' (16%). The figures for parents with children under five were 21% and 11% respectively.

This study indicated that this may be due to accessibility of mobile devices in older children, that they have later bedtimes and that they are more likely to watch content unsupervised.

Concerns are relatively greater for live sport than other content

42% of the parents had children who watch live sport. Live sport was of greater concern to them than other

content. 47% said they were 'extremely' or 'very' concerned about gambling advertising. This compares to 39% of parents extremely or very concerned about gambling advertising in shows other than sport and other sports-related shows their children watch. 17% reported they were "not at all concerned" about their children's exposure to gambling advertising in live sport.

There is no consensus among parents on the earliest time to allow gambling advertisements in live sport

The majority of parents recalled seeing gambling advertising in live sport during the afternoon and early evening.

To restrict access, 75% of parents said they limited the time of day that content was consumed. 70% limited the types of shows consumed. An acceptable time in the evening for gambling ads to appear during live sport was nominated by 21% of parents as 'never'. 4% said 'any time'.

Parents of older children (who were the group most concerned about gambling advertising) were more inclined to select later times (9pm or later) for advertisements to begin appearing. The qualitative research revealed that most parents felt the 8.30 pm cut-off time (as per the new broadcast restrictions), was too early and didn't account for older children staying up later to watch live sport.

"Up until 8.30 they've restricted it, so the problem is the games we watch are generally between 7.30 and 9.30. So in the first half you won't have gambling and then after 8.30 it's a free-for-all..." *Parent Group*

"You can stop it while they're with you, but what about when they're out?" *Parent Group*

Television is the most common way parents and children consume live sport

67% of parents surveyed had consumed live sport in the past month. Television, both free-to-air and subscription, was the most common method. 42% of children watched live sport in the preceding month. Of those, 95% watched it on television, 27% streamed it online and 10% listened via radio – according to their parents.

Some parents mentioned that their children are exposed to sports-related shows by default as their parents like to watch these shows. Children watch live sport with their parents more frequently than they watch other types of content with them. The top 6 sports watched on television were: Olympics, AFL, Commonwealth Games, cricket, soccer and NRL.

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Research Update

January 2020

7

Three quarters of parents selected the viewing times for their children. 7 in 10 parents chose the shows that their children could watch.

Most agreed they rarely pay conscious attention to television advertising. Ad breaks during sports broadcasts on commercial television were described as an opportunity to tune out or do something else e.g. check phone, prepare snacks. Children also were likely to wander off during ad breaks and therefore were less likely to be exposed to gambling ads.

More than half of parents perceived there to be an increase in gambling advertising during live sport, despite placement data revealing an overall decrease

Of the parents who had watched live sport in the preceding month, 88% said they recalled gambling ads while doing so. 61% of parents reported they had seen an increase in the amount of gambling advertising during live sport. 55% noticed an increase in gambling ads on television and radio in the previous 6 months. 2/3 said it had increased 'a lot'.

Only 8% of non-sport program viewers said they saw gambling advertisements 'every time' in non-sports programs. 60% reported seeing it some of the time. 65% said their child was with them some of the time and 15% said their child was with them always, or most of the time, that these gambling advertisements were seen.

"It seems daily. All day." *Parent Group*

"There's so many ads now...it's more than you should be betting on the sport, not just actually watching and enjoying the sport." *Parent Group*

"And they run the same one over and over again, each ad break, so you'll see the same thing two or three times." *Parent Group*

However, advertising placement data demonstrates that while gambling advertising has increased overall on television and radio, there has been strong compliance with the safe zone restrictions and a general decrease in gambling ads during all live sport.

High levels of recall of gambling advertising on social media, outdoor sources and print media

- 94% reported seeing gambling ads while watching live sport on television.
- 81% of parents said they had seen gambling ads via one or more sources other than television/radio.
- 48% saw ads on outdoor billboards, bus stops etc.
- 46% saw ads in newspapers/magazines or while reading the news, blogs or articles online.

"Normally on YouTube on the computer it will pop up on the side, but on your phone it will pop up just underneath the video for like a gambling game..." *Teen Group*

"In most games...if you watch ads and some of them are gambling ads, you watch ads to get better at the game..." *Teen Group*

"When you're looking at your rugby league app and you're seeing who's playing, there's an [gambling company] ad in between them, and you can click on that and go and put bets on." *Parent Group*

Attitudes towards gambling advertising

62% of parents said they were bothered by gambling advertising. 28% of this group said they bothered 'a lot'. 37% said they were not bothered at all. 66% of parents reported being bothered by advertising focused on the promotion of betting odds.

Parents and teenagers described how they felt annoyed and overwhelmed by the volume of gambling advertising on both broadcasting and online platforms.

"It's ridiculous. They advertise it too much". *Teen Group*

"It's in your face all the time...it's everywhere." *Parent Group*

"...I am annoyed that it's on and we're having family time and it's on and I just think it's inappropriate." *Parent Group*

"If children and families are viewing it, it normalises gambling, and gambling can be a problem." *Parent Group*

Attitudes to children being exposed to gambling advertising

72% of parents were bothered by their child being exposed to gambling advertising. 23% said they were not bothered at all. Older parents were more likely to be bothered 'a lot'.

Online pop-up ads were described by most parents to be one of the most insidious forms of gambling advertising. Many parents thought gambling ads broadcast during prime time was inappropriate for children and a cause for concern.

[Click here to access the full report](#)

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Number 217, January 2020

In Control: How to Support Safer Gambling Using a Behaviour Change Approach

Revealing Reality for the Senet Group

2019

Overview

The Senet Group (UK) commissioned Revealing Reality to undertake research to better understand the psychology of control in gambling. The research took a behaviour change approach that looked at how and why people gamble, when they do and don't enjoy it, and how they manage their gambling behaviour so it remains enjoyable and does not cause their families harm.

Background

The Behaviour Change approach has 3 components:

1. Those whose behaviour is being changed, must have an awareness of **what** the desired behaviour is,
2. They must understand **why** it is beneficial to change behaviour, and
3. Strategies and tools to make change easier must be conveyed to make it clear **how** to change behaviour.

As the gambling industry has grown, so have concerns about the harms associated with gambling. Many people enjoy gambling, understand the risks and come to no harm. The researchers state that there is, however, a fine line between responsible gambling and gambling that may be harmful. A message to 'stop' or 'start' something will not, on its own, reduce harm.

Aim of the Study

The aim of the research was to identify practical ways to support players and help them gamble safely.

Method

25 participants were interviewed by a researcher in their homes. The researcher then shadowed them to observe their typical gambling behaviour e.g. while they were betting online.

The researchers looked at the participants' habits and routines around gambling, their preferences, their

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spending, playing patterns, any negative experiences and what they avoided.

Results and Discussion

For the most part, it was found that the participants were significantly under-reporting their gambling behaviours and associated impacts in the PGSI survey.

Enjoyable gambling is controlled gambling

The majority of gamblers enjoyed gambling, either as a social activity with friends, or on their own. As some participants described some gambling experiences when they felt out of control, there needs to be a preventative approach to minimising gambling-related harm. To do this, it is necessary to understand why and how people seek to remain in control of their gambling i.e. their motivation and their existing strategies for doing this.

People regret gambling when they're not in control

Loss of control included betting higher sums of money than intended, spending longer in betting shops than planned or playing on machines or online games that they usually avoided.

Anthony, 33, enjoys playing online roulette to unwind after work. His worst gambling moment was last New Year's Eve when he was drunk with his friends. They decided to play online roulette and Anthony ended up spending £140. He could recall winning back only around £50. After that evening, he decided to place a £60 deposit limit on his account. "I didn't realise how much the damage was until the next day. It wasn't a nice feeling."

Interestingly, remorse did not directly correspond with winning or losing. Participants described times they had lost money but had not regretted it, accepting it as part of the game. They seemed comfortable with losses as long as they had not jeopardized their own pre-established boundaries. Regret was often linked to a feeling of loss of control.

Emily, 23, is a student in Cardiff, who enjoys going out to play poker. For her, winning is a bonus. "I prefer to win but I'm not devastated when I lose."

People set boundaries to stay in control of their gambling

Nearly all participants had limits on a reasonable spend. Some limited the size of deposits, some limited their stakes. Other participants had boundaries on the kinds of gambling they would do, based on what they felt was riskier or easier to overspend on. Many felt it was harder

to stay in control when gambling online, or on EGMs. Others set boundaries on a time or place for gambling.

These different boundaries were on a spectrum. At one end were a couple of 'approximate' rules for what they considered to be OK. The other end of the spectrum were those who had clear, well-defined boundaries in most aspects of their gambling behaviour. Researchers found significant variation in how successful participants were at keeping within their boundaries. Participants were not always aware at a given moment, whether they were within their boundaries e.g. those not keeping track of wins and losses in order to know if they were sticking to their budget.

Anthony, 33, has a boundary of not placing stakes that amount to more than £15 a week on sports betting. A screenshot of his bet history on his phone demonstrates that, over the four days between 30 September and 3 October, he placed stakes amounting to £50, well over his stated boundary. It was clear, he hadn't kept track of his wins and losses.

Motivations to stay in control

Motivations vary from person to person. This doesn't matter in terms of how industry responds. What matters is that industry helps increase and reinforce people's desire to stay in control, and that they do not undermine their motivation to do so.

Those with wider financial responsibilities seemed to have a more acute sense of the potential consequences of losses e.g. compromising the wellbeing of their family. Several participants were aware that their gambling had had detrimental effects on relationships. Many participants had kept secrets about their gambling. This caused guilt about hiding the truth.

Hettie, 38, recently quit her job. She is now volunteering. She often hides scratch cards in her bag, as she knows her husband doesn't like her buying them. She feels guilty about it – but says she prefers to hide them than to argue with her husband.

"Deep down, you know it's not a good way to do things, and you don't want your kids to learn from your mistakes." Damion, 37

"My wife is always concerned about it. I don't want to upset her." Laith, 37

All participants showed concern about how others may perceive their gambling behaviour. Not wanting to be seen as someone with a problem, seemed to be a

compelling motivation for most participants to monitor their gambling.

However, participants gave differing definitions of 'problem gambling'. Commonly identified traits and warning signs were:

- Having to borrow money from family or friends,
- Being unable to pay bills,
- Getting frustrated or angry at machines or staff,
- Chasing losses,
- Becoming depressed because of the amount of money lost, and
- Taking up drinking because of the amount of money lost.

Most participants shared the conviction that they were not problem gamblers.

Several participants drew direct comparisons between gambling and behaviours such as overeating, drinking or smoking. They classified gambling as a similar vice.

Therefore, motivations to stay in control are:

- Avoid Loss – people don't want to lose more than they can afford,
- Avoid Stigma – people don't want to be associated with 'problem gamblers',
- Protect Relationships – people don't want to harm their relationships, and
- Positive Image – people want to feel they are the sort of person who stays in control.

Strategies for staying in control

As well as wanting to set boundaries, people need practical strategies, tools and techniques to achieve their behavioural goals. Industry can support customers' strategies to stay in control, and not undermine the customers' ability to use strategies to do so.

1. **Tracking spending:** A common factor emerged that participants struggled to keep track of what they had **won** and **lost**. Some did not account for the fact they continued to gamble with money they won. Also, it was harder to keep track when gambling in more than one venue, or across different apps. Some tracked their bank balances to gauge if they were gambling too much.

Susanna, 26, is a train driver from London. She gets messages from her bank confirming payments she has made into her online gambling accounts. She feels this acts as a reminder of how much she has spent when she looks through all the messages that she has received.

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Research Update

7

2. **Avoidance strategies:** Participants avoided games they saw as more 'dangerous' or more easy to lose money playing e.g. EGMs. Some said that when they did sports betting, they would only bet a particular way to reduce the chances of losing more than they wanted to e.g. only gamble on live sports.

Zac, 26, (on playing online roulette) "It's like the crack cocaine of gambling. Everyone knows it. That's why I try to stay away from it."

3. **Avoiding bad influences:** There were many participants who had people in their lives who facilitated or encouraged them to gamble in ways they felt were less controlled. This was especially true when gambling was the main social activity they shared with friends. Several participants said they avoided certain people or limited communication with those people in order to stay within boundaries.

Aaron, 23 "We all get competitive, egging each other on."

4. **Avoiding opportunities:** Several participants described cutting down opportunities or access to gambling environments – both online and offline in order to avoid 'temptation'.

Susanna, 25, mentioned that when she first started gambling, she downloaded 3 apps because of their introductory offers. As time as went by, she realised having multiple apps was tempting her to spend more, so she removed most of the apps from her phone so she could only use one.

5. **Accountability strategies:** A minority of participants said they had lied about, or concealed, the extent of their gambling. Some had clear boundaries around being honest about their gambling now, as a gauge for judging whether they were in 'safe' or 'problem' gambling territory.

Damion, 37, uses the joint account he shares with his partner to pay for his gambling, to ensure the amount he spends is visible to him and his wife. He feels this way he will be less tempted to overspend.

6. **Limit setting strategies:** Almost all participants had boundaries around the total amount of money they were happy to spend gambling. Several had weekly deposit caps on their betting accounts. Other measures included withdrawing a predetermined amount before betting, some

leaving their cards at home to prevent further withdrawals.

Some found it useful to set limits on the time they spent gambling. This could be done by only betting in venues when they had a strictly defined time to be there e.g. lunchtime from work.

Most participants tried to limit their stake size – online and in venues. Most relied on their own powers of restraint to do this. Some mentioned that discipline could falter e.g. when they were feeling lucky.

Gavin, 34, goes to the betting shop only at lunchtime. This means he is only ever able to spend a maximum of an hour in the shop, and this prevents him from getting 'hooked in'.

Arthur, 30, limits his stakes to £1 & £2 bets on the football and will also have a maximum of £3 on his football accumulators. He does this so that he doesn't spend more on 'unnecessary' bets he thinks he will lose money on.

Industry can support customers by:

- Embedding messages around the benefits of controlled gambling,
- Providing opportunities for customers to set and express a wider range of boundaries,
- Supporting customers to stay within their boundaries, and
- Once customers have set boundaries, support and respect these by ensuring that wider marketing, product messaging or direct marketing doesn't contradict or undermine them.

Conclusions

This research shows that those who enjoy gambling, continue to do so as long as they feel they are in control. They set themselves boundaries such as how much they spend and how long they play. As long as they stay within these boundaries, they stay in control.

When they feel they have crossed their boundaries, they feel guilt or remorse and enjoy their gambling experience less.

[Click here to access the full report](#)

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AGENDA ITEM 8:
Other Business



Responsible Gaming Committee Memorandum

To: Responsible Gaming Committee
From: Mary Manos
Date: 7 February 2020
Subject: Review of Committee Charter

Dear Committee Members

Article 5 of the Committee's Charter requires that the Charter be reviewed on an annual basis.

A formal review of the Charter has been conducted with a small number of non-substantive changes recommended.

A copy of the updated Committee Charter is attached.

Proposed Resolution

Having reviewed the Charter, it was **RESOLVED** that the Committee recommend the attached updated Charter for approval by the Board.

Kind Regards

Mary Manos
General Counsel & Company Secretary

8.1



Crown Resorts Limited Responsible Gaming Committee Charter

Crown Resorts Limited ACN 125 709 953
A public company limited by shares

Table of contents

page

1.	Introduction and background	1
2.	Composition of the Committee	1
2.1.	Structure	1
2.2.	Compensation	1
2.3.	Expertise	1
3.	Duties, responsibilities and powers	1
3.1.	Responsible gaming programs and policies	1
3.2.	Engage external consultants	2 ⁺
3.3.	Board Reporting	2
4.	Proceedings	2
4.1.	Meeting frequency	2
4.2.	Committee papers	2
4.3.	Attendance at Committee meetings	2
4.4.	Quorum	2
4.5.	Minutes	2
5.	Amendment and review	3

1. Introduction and background

The role of the Committee is to monitor and review responsible gaming programs and policies at each of Crown Resorts Limited's (the **Company**) wholly owned businesses.

2. Composition of the Committee

2.1. Structure

The Committee will be comprised of a minimum of two directors to be nominated by the Board.

The Chairperson of the Committee will be nominated by the Board. If the Chairperson of the Committee is not present at a Committee meeting, the members present must elect one of themselves to Chair the meeting.

Unless otherwise nominated by the Board, the Company Secretary will act as secretary of the Committee.

The appointment of a Committee member will cease if that person ceases to be a director of the Company or as otherwise determined by the Board.

2.2. Compensation

The Chairperson and individual members of the Committee may be entitled to fees additional to the directors' fees to which they are entitled, as may be determined from time to time by the Board.

2.3. Expertise

Members will have the skills and experience required to enable them to fulfill their duties and responsibilities as members of the Committee.

3. Duties, responsibilities and powers

3.1. Responsible gaming programs and policies

The Committee will:

- (a) monitor and review the operation and effectiveness of responsible gaming programs at each of the Company's wholly owned businesses;
- (b) recommend policies and procedures and consider recommendations from management which may enhance the effectiveness of responsible gaming programs at each of the Company's wholly owned businesses; ~~and~~
- (c) promote and support continuous improvement in the responsible gaming performance of the Company's ~~s-and its~~ wholly owned businesses; and
- (d) encourage and promote awareness of responsible gaming and related welfare issues at the Company and its wholly owned businesses.

3.2. Engage external consultants

The Committee has the full authority of the Board to:

- (a) communicate and consult with external and internal stakeholders concerning the Company's responsible gaming practices; and
- (b) appoint independent experts to provide advice on responsible gaming issues.

3.3. Board Reporting

- (a) The Committee will update the Board at each meeting of the Board that follows a Committee meeting and make relevant recommendations in relation to matters arising for consideration by the Committee;
- (b) report to the Company's wholly owned subsidiary boards from time to time as considered appropriate by the Committee or as otherwise requested by the relevant subsidiary board; and
- (c) make a copy of the minutes of proceedings of meetings of the Committee (and resolutions passed by members of the Committee without a meeting) available to the Company's subsidiaries, for distribution to their relevant boards.

4. Proceedings

4.1. Meeting frequency

The Committee will meet prior to each full regularly scheduled meeting of the Board.

4.2. Committee papers

Relevant documents to be considered at Committee meetings will be compiled and distributed by the Company Secretary to all Committee members as well as to any invitees to relevant Committee meetings.

4.3. Attendance at Committee meetings

The Committee may extend an invitation, which may be a standing invitation, to any person to attend all or part of a scheduled Committee meeting. Only Committee members shall be eligible to vote.

4.4. Quorum

A quorum for a meeting of the Committee is two members.

4.5. Minutes

Minutes of proceedings and resolutions of meetings of the Committee and resolutions passed by members of the Committee without a meeting, are to be approved by the Committee (or in the case of written resolutions, tabled) at its next meeting.

Minutes of a meeting must be signed by the chair of the meeting within a reasonable time after the meeting at which the minutes are approved.

A resolution may be made if a document containing the relevant resolution is assented to by all Committee members eligible and willing to participate in the making of the resolution.

The resolution will be taken to have been passed when the document is last assented to by a Committee member. Where a Committee member has assented by means other than writing, that Committee member must sign the document containing the relevant resolution within a reasonable time after having provided their assent.

5. Amendment and review

The Committee must review this Charter on an annual basis to ensure it remains consistent with its objectives, the Constitution and existing regulatory requirements and recommendations. Any proposed changes must be referred to the Crown Board for approval.

Crown Resorts Limited

February ~~2019~~2020



Responsible Gaming Committee

Memorandum

To: Responsible Gaming Committee

From: Mary Manos

Date: 7 February 2020

Subject: Future Meetings

Dear Committee Members

Committee meetings for 2020 have been scheduled as follows:

Meeting Date	Time (Melb time)	Location
Wednesday, 1 April	10.00am	Teleconference
Wednesday, 10 June	12.00pm	Chairman's Office Level 3, Crown Towers
Tuesday, 11 August	11.00am	Chairman's Office Level 3, Crown Towers
Wednesday, 7 October	10.00am	Teleconference
Wednesday, 2 December	12.00pm	Chairman's Office Level 3, Crown Towers

Kind Regards

Mary Manos

General Counsel & Company Secretary

8.2