

J. Whether you consider changes to relevant Victorian legislation, including the Casino Control Act and the Victorian Commission for Gambling and Liquor Regulation Act 2011, as well as the Crown Melbourne Contracts, are necessary for the State to address your findings and implement your recommendations.

The VCGLR must create the system for responsible stakeholders: A Level Playing Field - - Responsible Consumers: Responsible Crown Casino Employees: Responsible Crown Melbourne and Responsible Government Regulators:

a] A mandatory, cashless ID “Gambler registration” card with consumer safety tools

All poker machine venues but especially Crown, as it has a far higher annual loss per machine, would benefit from any government-managed, mandatory cashless card for all pokies venue gamblers. The online TAB gambler card already requires mandatory registration before gambling. It carries a transaction record, warnings / educative information, referral to counselling, a pre-commitment tool and self-managed private self - exclusion. All online TAB gamblers already have these tools from Day One of their gambling career, so they are well-warned and well-informed with readily available tools for self-care and safety referral. Why has the VCGLR ignored the safety of pokies gamblers? Pokies gamblers are being denied consumer justice.

Crown Casino’s poker machine venue gamblers urgently need those same tools to become more responsible consumers. Venue training and intervention strategies could support those additional changes. A **mandatory** Gambler ID Registration card could reduce intrusive, stressful staff interventions, if it warned of addiction signs earlier, both privately and directly to the gambler himself. Most gamblers would practise self-care prior to becoming addicted.

Responsibility between all gambling stakeholders must be equally shared, to maximize safety and to minimize gambling harm to individuals and families, communities and taxpayers. Government still possesses too few independent, foolproof “check / balance” tools to accurately monitor venue activities eg gambling takings per gambler per day per venue. Taxpayers are less protected as too few consumer records are collected and kept.

By using mandatory gambler cards, no venue need run the risk of receiving any fine or penalty for non-performance of gambler safety duties, if these related to illegal entry. Exclusion could be easily instigated state-wide, if a gambler could exclude himself via a card-based, self-managed, jurisdiction-wide, private self-exclusion process. The need for a gambler to approach a venue for help could be avoided. The need for gambling companies to be so vigilant of harmed gamblers would be negated. Gambling industry risk could become virtually non-existent. The card could simply bar any excluded gamblers, period. Excluded gamblers would not be able to access machines anywhere in the jurisdiction. Partial exclusion orders, for restriction only in the gambling areas, to allow for patron dining and other services, would also become unnecessary by using ID cards.

Families might also be warned earlier and more accurately of their loved one's

gambling harm if they could view a gambler's card and transaction record earlier. Since addicts lie and bank statements and secret loans do not show all gambling spending to families, a card to show total spending seems to me, essential for protection of others. Counselling for families could be accessed earlier if these consumer-managed referral tools were offered via cards.

Gambler managed ID cards would be a far better and safer option for all stakeholders. No card is 100% efficient as we see at times with forged drivers' licences, however such breaches of trust are relatively rare and sanctions could be imposed, to deter using a "fake or second ID card". Legal challenges may be reduced for the gambling industry, if any person claimed later to have been allowed to have illegal entry, by using a "fake" ID gambling card. The use of any card would be recorded in any machine that a gambler had used, so would later show to be illegal. Gambler litigation risks could be avoided. The gambling industry has made the system possible for self-exclusion to be abused. It has the responsibility to stop that loophole. The government should also work to close it.

b] Crown Casino Self-Exclusion Program:

The current self-exclusion system in Victoria is entirely inadequate, cumbersome, costly to administer and untimely. It is also very unreliable and under-used. [<https://www.abc.net.au/news/2020-10-09/pokies-self-exclusion-myth-sees-no-venues-punished/12743558>]

The same result could be better achieved more reliably and quickly via a consumer self-managed, mandatory Gambler ID Registration card that would block all excluded gamblers, with consumer self-exclusion tools that also offer counselling referral far earlier. Crown Casino poker machine gamblers are far less likely to request self-exclusion that is draconian. In contrast, the online gambling TAB card offers 24 hour to 180 days private, unobtrusive, efficient self-exclusion choices. That flexibility is currently not offered to Crown Casino pokies gamblers. Gambling addicts suffer shame and stigma, so to have a system where "others will know" is unlikely to work well, especially when very few gamblers self-exclude, even as a last resort. The problem with voluntary, public self-exclusion is that it comes as a too severe and tardy "publicly shaming" option. Thus it is actively avoided.

A well-managed gambler card system would stop any illegal and under-aged gambling swiftly, accurately and without humiliation. Exclusion periods also could be more flexible. If families applied to exclude a loved one, then the transaction record would indicate evidence of spending. I do support the right of venues including Crown, to approach any at risk gambler directly, but this could be a supplementary action perhaps and less needed, if more gamblers could self-exclude privately, far earlier? Obviously, it would be sensible if all player accounts [including online] could be suspended if a gambler self-excluded via his ID card.

The best way to exclude under-aged gamblers would be to exclude them from gambling in the first place, If sufficient legislative deterrents were placed upon gambling card-holders and also upon under-aged gamblers who may abuse the system by using an unauthorized card, then those people could all be potentially penalized, either with card cancellation or with a fine. By making the gambling card-

holder liable if his card were misused, I doubt that many card-holders would willingly give their cards to any other gambler, excluded or not. Drivers rarely share cards?

The risks of misuse of cards would be far outweighed by the benefits of using them when most consumers would use them properly. Since under-aged gamblers now gamble illegally, any system would be better than our current mode of checking a gambler's age. Under-aged gamblers are often "let in" by gambling staff who are mates, but the card system could be made very secure, by responsible, careful ID checking initially, eg like passports are ID checked at post offices, photo ID etc. Venue staff could also be more stringently fined if they allowed under-aged gambler entry. All stakeholders must be deterred, not just the under-aged gambler, through legal-based deterrents.

For decades now all gambling venues have hidden behind an ineffectual reporting system for self-exclusion, that has been much caused by the gambling industry including Crown's refusal to introduce and use effective card-based technologies. All gambling venues including Crown Casino must concede that they cannot run a multi-billion dollar high-risk "All cash - No Proof" industry anymore. It is a bad idea all around. It also raises further social justice issues if all gamblers must undergo eg facial recognition in gambling venues, to catch a relatively few excluded gamblers.

c] Specially trained safety officers in Crown Casino: RGSC Model:

If specialist gambling intervention staff are too few in the Crown venue, then insufficient time might be available to properly carry out their gambler intervention and reporting duties. Who alerts those staff? If the officers work upon staff referral, then how are at-risk gamblers identified, to locate them reliably, unless an officer could attend any calls immediately? Crown Casino staff surely would not know all gamblers in the venue. Gamblers use multiple venues so their harms may stay unseen. Agitated gamblers often change machines frequently, so "the guy on No.246 needs a chat" probably does not work, even five minutes later, after an alert is raised? Shift workers change. Staff come and go from Crown Casino no doubt. Record-keeping must be a nightmare for staff. That is an OHS issue.

This well-intentioned promise to have a couple of specially trained accessible Crown Casino staff becomes lip-service if it is impossible to implement. It would be hard for even two Crown Casino staff members to carry out the list of promised venue and consumer safety demands efficiently, in practice. Between incident reporting, machine pay-outs, cash-handling, cleaning and Eftpos duties and general housekeeping, I think the idea of "special staff" certainly becomes impossible to implement, eg after midnight when a high proportion of gamblers may be using machines, when visibly addicted. If intervention is haphazard, true consumer protection is unlikely.

I have spoken with venue staff and managers. All have told me of reporting issues.

Venue staff are already placed in too hazardous a supervisory position in being expected to watch for and approach addicted, at-risk gamblers, simply by picking up cues. Their stress may be alleviated to some extent, by being able to pass the duty of confronting the gambler to another officer. I see some value in having enough specialist staff within Crown Casino at all opening hours, but I see problems with

reliable identification of at-risk consumers, incident reporting and harm minimization implementation in peaks. If the RGSC system were used in conjunction with a card-based gambler ID system, to reduce the workload of checking for excluded gamblers, the use of higher trained staff with protective legal powers to approach at risk patrons could be effective and more beneficial.

Earlier warning of gambler overspending by use of cards may resolve gambling issues, so family violence may never be reached. All laws to support family access to counselling must be supported and strengthened, with maximum privacy and protection for all parties. It should not be either the role or responsibility of any venue staff to do more than stop excluded gamblers from gambling and to keep the venue safe. Venue staff should not be expected to do the impossible eg be responsible for handling family violence risks arising from family altercations. Given that family violence may not always occur and that other legal remedies eg Intervention Orders may be offered as appropriate, then venue involvement should not be expected nor encouraged, let alone trusted to offer any reliable or legally endorsed protection from violence. We have a police force for that aspect. Gambling venues could be taken entirely out of the equation regarding responsibilities eg family violence management.

If mandatory gambler ID cards were in place then the VIC government could also penalise any venues that failed to exclude gamblers from gambling. Given that a far better, more reliable card system could be used to exclude gamblers and that a card could be made that was not easily transferable between gamblers [eg photo ID or fingerprint checking on entry; sanctions for misuse of cards], the need to penalize clubs and hotels should be negated, unless they were cheating.

The fears of swapping cards are more apparent than real possibly, since no gambler would like someone else's spending to be recorded on his Registration ID card, presumably? Such suggestions are given by the gambling industry often, to deter the government from considering mandatory ID cards for gamblers. I am forced to reflect upon why the gambling industry should never want a whole cohort of gamblers to be measured accurately, according to what each one spends, per venue. The old Nanny State fears surely do not wash, when such ideas as facial recognition will be considered, instead? Online TAB gambling cards work quite well. Any gambler found using an ID card wrongly could be penalized, along with the owner of the card and Crown Casino, as required.

If all Australian states used a cashless ID gambling card administered by governments, as Minister Dominello in NSW also recently proposed, then all Australian gamblers, the ATO, taxpayers, governments and families would all be better off. The benefits would extend to far greater a degree than merely stopping self-excluded gamblers. Gambling venue operators could also be brought to better account.

d] Fully Protective Victorian Whistleblower Laws:

To properly reduce gambling-related harms that impact so badly upon gamblers' families, communities, Victorian taxpayers and government, then gambling venue staff and all other people with relevant information **MUST** be able to freely report to

the VCGLR privately in full safety and fully protected by whistle-blower laws, for all venue related matters. Since a high degree of trust is currently bestowed upon all gambling operators to be honest, then whistle-blower protections should be in place for all people, to ensure that gambling is always operated honestly, in Victoria. Confidential reporting by whistleblowers MUST be fully protected. Currently it seems a grey area of regulation where the gambling industry may bully, despite written assurances by the VCGLR.

The venue gambling industry including Crown Casino is a high-cash industry and is always prone to cheating; by staff, external contractors [especially machine-servicing contractors] and venue owners / operators. All whistle-blowers should be properly protected, if reporting on any area of concern to government, about any aspect of venue or consumer management. If all venue gamblers had to possess a personal ID card that could be used jurisdiction-wide and not just venue-wide, to also include one total record of gambling spending for every gambler, then whistle-blower complaints eg about money-laundering may be better supported with proof. The required evidence to charge the any party for illegal operations would be to hand. Charges would stick more often.

e] Poker Machine Gambler Licensing – The “L” Word:

Singapore local casino gamblers already all pay \$3000 annually or \$150 a visit, to gamble. The system worked so well the fees rose from \$2000 annually, and the Singapore government, taxpayers, gamblers and local families have all been better protected. Addicted Australian gamblers easily lose \$10-20,000 weekly. Pokies are not the game they are said to be. By charging all gamblers \$500 total a year [in 4 instalments?], or say \$20 for one weekly entry to venues, the government could increase revenues, to independently cover the net loss from pokies. The TAB now issues an ID card to all gamblers, where safety tools are noted on the TAB site, to reduce gambling harms for gamblers. A similar government-issued card with similar consumer self-protection tools could easily be administered through post offices for use in all Victorian pokies and online gambling venues, including Crown Casino.

New innovations such as Bitcoin and blockchain technologies that are now being considered in the US, will require far more stringent management of gambling if these "anonymous" currencies are introduced for use gambling venues in Australia. Whatever happens, the damage from pokies gambling especially, must be curtailed. We need more jobs and less spending on pokies. We need stronger businesses. We need far more than "just" harm minimisation and stronger exclusion from gambling venues. We need licensing.

In summary I cannot think that a better system than the introduction of mandatory poker machine gambler registration could be introduced, unless we moved to gambler licensing, annually like in Singapore. Various forms of gambling could then be levied differently, like vehicle licensing. Introduction of mandatory, government-managed ID cards for all venue and casino gamblers, would be a better, cheaper and simpler solution for Victoria and indeed all of Australia. The same ID / Registration card would reduce or negate money-laundering and would provide reliable "paper trail" evidence to properly convict wrongdoers. It could empower the consumer to self-exclude anonymously and by providing the consumer with a

transaction record, all poker machine gamblers could at last know their exact amount of spending, per venue, per day, from their very first day of gambling. Existing self-exclusion methods are clumsy and unreliable and counselling is held as the top intervention. It may be, however counselling is accessed way to late if ever and poker machine gamblers need FULL consumer protection from BEFORE they ever gamble. Arguments that rely upon "Nanny State" claims are illogical when we already manage our high-risk pastimes eg driving, flying and fishing with strictly enforced licences. It is absurd that we should protect our fish more than our gamblers, families, shop keepers, taxpayers and others. Nobody deserved what pokies brought us.
