**Royal Commission into the Casino
Operator and Licence**

Supplementary Submission of the Victorian Responsible Gambling Foundation

1. This document responds to a letter from the Solicitors Assisting the Commission,[1] which states that the Commission would be assisted by a supplementary submission from the Victorian Responsible Gambling Foundation (**Foundation**), which identifies with precision:

    (a) the data it submits should be made available

    (b) who should be provided with the data identified in (a)

    (c) whether the data should be anonymised, and

    (d) any other matter it considers necessary.

Data that should be made available

2. By its submissions dated 2 August 2021 (**Foundation's Submission**) the Foundation makes a number of recommendations as to research that should be undertaken in relation to responsible service of gambling (**RSG**) as it applies to Crown's Melbourne Casino.

3. The categories of data listed in **Appendix A** are needed to enable the proposed research to be undertaken.

4. **Appendix B** provides more detail in relation to each of these data categories, including the specific research topic or topics for which the data is required, and the types of data that the Foundation would expect to be included within the identified category.

5. Research in relation to the following research topics is recommended by the Foundation's Submission:

    5.1 Staffing, observation and intervention[2]

        (a) the optimum number of dedicated officers on a gambling floor to ensure behavioural indicators are observed and intervention is timely, and

        (b) for the purpose of considering the efficacy of Crown's RSG program, the factors that influence adequate staffing on the gambling floor, for example, the types of gambling, size and layout of the venue, number of electronic gaming machines (**EGMs**) or other gambling forms, percentage of people playing 'uncarded' and total number of patrons and time of day.

    5.2 Breaks in play[3]

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[1] Dated 6 August 2021.
[2] Foundation's Submissions at [4.5.3(c)].
[3] Foundation's Submissions at [5.2.2].

(a)   the adequacy of breaks in play by reference to the length and nature of the break, product and the environment of the Melbourne Casino, and

(b)   the most appropriate ways a gambling venue can enforce breaks.

5.3   Limits,[4] including what an appropriate money limit is for an individual who gambles in order to reduce their risk of harm and of developing problem gambling, and how the existing research relates to specific products, for example table games, fully automated table games (**FATGs**)/semi-automated table games (**SATGs**) and EGMs.

5.4   Loyalty programs and incentives focused on how to prevent or minimise harm.[5]

6.   The Foundation has also submitted that Crown's Code should be reviewed periodically to ensure that it incorporates emerging research and industry best practice.[6]   This will require evaluations and further research in relation to the:

6.1   nature and extent of gambling harm in the Melbourne Casino

6.2   nature and extent of gambling harm associated with table games (including FATGs and SATGs), and

6.3   evaluation of the RSG Program at Crown Melbourne.

Who should be given access to the data?

7.   In the Foundation's submission, RSG research should be:

7.1   undertaken independently of Crown and the gambling industry, and

7.2   peer reviewed.

8.   The Foundation also submits that it is the appropriate body to commission and/or undertake the proposed research.

9.   Further, to maximise the value of the research, it should be made publicly available to build on the body of knowledge on the topic.

10.   The Foundation submits that Crown should be required to make the data referred to in Appendices A and B available, as and when required to carry out research, to:

10.1   the Foundation

10.2   regulators and relevant Victorian government departments or agencies with oversight of, or functional interest in, gambling in Victoria

10.3   researchers supported by the Foundation or relevant Victorian Government agency.

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[4] Foundation's Submissions at [6.4].
[5] Foundation's Submissions at [7.3.2].
[6] Foundation's Submissions at [7.3.1(a)].

11.   Additionally, Crown should be encouraged to provide the data to researchers who satisfy the criteria referred to in paragraph 7 for the purpose of conducting research in relation to RSG or gambling harm in the casino environment.

Should the data be anonymised?

12.   For the purpose of carrying out the recommended research, it is not necessary that the identity of individuals be disclosed. Consistent with privacy obligations it is recommended that any data provided by Crown be anonymised sufficiently so that a person cannot be identified. However, other sociodemographic data, for example age, gender, postcode, ethnicity or language spoken at home, and employment status should be disclosed given its relevance to identifying people most at risk of harm.

Other Matters

13.   <u>Availability of data</u>

It was apparent from the evidence of Crown's witnesses Ms Bauer, Mr Emery and Mr Mackay (written and oral) that much of the data identified in Appendices A and B is currently collected by Crown. To the extent that it is not, the Commission should consider a recommendation that Crown be required to collect that data.

14.   <u>Format of data</u>

The 'value' of data, in terms of its application, depends in part on the format in which it is provided. As such any obligation to provide data should extend to the raw dataset that sits underneath any reports or summaries, and include explanatory information of variables (for example, a codebook or data dictionary).

15.   <u>Access to the Melbourne Casino for the purpose of undertaking research</u>

In addition to data and documentation, depending on the scope and design of the research, research and evaluation projects may require access be provided to Crown Melbourne's:

15.1   gambling floor and the casino environment for the purposes of observation

15.2   management, staff and customers for the purposes of primary data collection (interviews, surveys etc)

15.3   surveillance and facial recognition technology for the observation of the gambling floor and casino environment.

16.   The Foundation recommends that Crown be required to facilitate such reasonable requests for access in the same way that it is required to provide data.

10 August 2021

Maddocks
Solicitors for the Victorian Responsible Gambling Foundation

APPENDIX A

Categories of Crown Melbourne data that may be required to support the delivery of research

1. Casino customer gambling activity data for carded and uncarded play, gambling activity and product.

2. Limit setting data, specifically PlaySafe data for fully automated table games (**FATGs**)/semi-automated tables games (**SATGs**).

3. Machine data (for example, operation of electronic gaming machines (EGMs) in restricted and unrestricted mode, number and location of EGMs on the gambling floor, SATGs and FATGs).

4. Loyalty program database(s), detailing member demographics, loyalty status, gambling behaviour and products used.

5. Loyalty program terms and conditions, benefits, incentives offered.

6. Marketing collateral associated with the loyalty program.

7. Staff interaction and observable signs data – including any databases used to monitor and report on observable signs and staff interventions.

8. Responsible Gambling Centre service delivery data, Exclusion and Time Out program data.

9. RSG training data.

10. Crown Model for identifying people that may be experiencing problem gambling.

In addition, researchers and evaluators may need access to Crown Melbourne's:

1. gambling floor and gambling environment for the purposes of observation

2. management, staff and customers for the purposes of primary data collection (interviews, surveys etc.)

3. surveillance and facial recognition technology for the observation of the gambling floor and casino environment.

APPENDIX B

Detail of data that may be required and its application

Category of Data	Likely Source	Data included in category	Research Topic
Customer data	Customer gambling activity database(s)	• Gambling activity of carded customers (database), including on EGMs, FATGs/SATGs, and any other gambling product into the future where carded play is enabled • Gambling activity should include, at a minimum: frequency, session duration, expenditure and gambling product used e.g. table game, FATG, SATG, EGM and EGM linked jackpot Gambling activity tracking data of customers not tracked via the carded system including: • on table games (other than FATG/SATG) • poker tournaments	Limits on play, time, money and frequency Breaks in play Adequate supervision of people who gamble Ongoing research to inform the legislative framework and Crown's Code
	Limit Setting database(s) (specifically PlaySafe on FATGs and SATGs)	Scope of data should include: • number, type and value of limits being set • number of times limit warning triggered • outcome/response to limit warning	Limits on play, time, money and frequency
Machine data	EGM operational data	Machine activity data available in short intervals (1 hourly), including: • operation of machine in restricted/unrestricted mode; bet sizes, spin rate etc. • expenditure, duration • number of machines in operation	Limits on play, time, money and frequency Breaks in play Ongoing research to inform the legislative framework and Crown's Code
	FATGs and SATGs operational data	Machine activity data in short intervals (e.g. 1 hourly), including: • number tables in operation • expenditure, duration • use of loyalty program	
Loyalty and marketing program data	Loyalty program database(s) and	• Database containing loyalty program raw data, which may include: ○ general demographic information	Impact of loyalty programs on gambling behaviour and the

Category of Data	Likely Source	Data included in category	Research Topic
	other marketing program data	o loyalty status o gambling behaviour, including frequency, session duration, expenditure and gambling product used e.g., table game, FATG, SATG, EGM and EGM linked jackpot • Description of marketing offer/incentive • Tier level/limits on customers offered incentive (if applicable) • Take up of offer/incentive	potential for incentives to cause harm Ongoing research to inform the legislative framework and Crown's Code
Staff interaction data	Observable signs data, including any databases used to monitor and report on observable signs and staff interventions	Data required, for example: • number of observed/reported signs • type of sign reported (i.e., time period, behaviour) • outcome/response to intervention • tracking databases related to observable signs ('Splunk' play periods system)	Adequate supervision of people who gamble Evaluation of the effectiveness of Crown's RSG Program
Responsible Gambling Centre	Service delivery data	• Client outcomes data • Customer referral data • Service delivery data • Satisfaction surveys or feedback	Evaluation of the effectiveness of Crown's RSG Program
	Exclusion database(s)	Database(s) would capture at a minimum: • exclusions based on various programs (self, third party etc.) • length of exclusion/time out • excluded person demographic and other characteristics (i.e. VIP status, age spending/time spent etc.) • breaches, repeated breaches • applications for revocation and outcome of applications (declined/approved with/without conditions) • re-entry into gambling and follow up data • exclusion program customer outcomes data (survey etc.)	
	Time out program (TOPA) database(s)	Database(s) would capture at a minimum: • number of customers in Time Out • length of time out (3/6 months) • breaches • TOPAs extended • conversion of TOPAs into self-exclusions	

Category of Data	Likely Source	Data included in category	Research Topic
		• TOPA program customer outcomes data (survey etc.)	
Responsible service of gambling training	RSG training database(s) and other sources	• Staff surveys • Management surveys • Observation/intervention with customer data	Evaluation of the effectiveness of Crown's RSG Program
Crown Model	Loyalty and other customer data	• Access to the modelling tool methodology, including predictive measures • Data inputs used, including the loyalty database, if applicable • Outcomes and effectiveness measures	Evaluation of the effectiveness of Crown's RSG Program
Primary data collection	In venue observation and access to staff and customers	Access to: • gambling floor and the gambling environment for the purposes of observation • management, staff and customers for the purposes of primary data collection (interviews, surveys etc.) • surveillance and facial recognition technology for the observation of the gambling floor and casino environment	Ongoing research to inform the legislative framework and Crown's Code All proposed research topics