

Perth Casino Royal Commission

Witness Statement of Melanie Strelein Faulks

16 September 2021

- 1 I am Melanie Strelein Faulks of c/- Crown Perth, Great Eastern Highway, Burswood 6100.
- 2 This statement is provided in response to:
 - a) the witness summons to give evidence dated 2 September 2021 and issued pursuant to section 9 of the *Royal Commissions Act 1968* (WA), which is directed to me by the Perth Casino Royal Commission (**PCRC**);
 - b) the list of topics to be addressed in my written witness statement provided by the PCRC on 8 September 2021; and
 - c) the additional topics to be addressed by me provided in a letter from the Solicitors Assisting the PCRC to Mr David Shaw dated 9 September 2021.
- 3 In this statement, I have referred to the documents in the attached list marked "**MSF-1**".

MY ROLE

(Questions 1 to 7)

- 4 I started employment with the Crown Group in September 2006. My employer is Burswood Resort (Management) Limited.

My previous roles

- 5 I started at Crown Perth in 2006 as a Sales Coordinator in the Hotel Sales department. In this role, I reported to the Director of Sales and Marketing, Hotel Sales (Mr Brendon Elliott until November 2008 and then Ms Michelle Docherty).
- 6 I transferred to the Responsible Gaming (**RG**) team at Crown Perth in November 2010, first in the role of Project Coordinator and then a month later in the role of RG Coordinator. I was promoted within the RG team to the role of Responsible Gambling Advisor in December 2011, and was then promoted in October 2013 to the role of Responsible Gambling Senior Advisor.
- 7 In these roles, I reported first to the Manager Responsible Gambling (Ms Pamela Evans until July 2011 and then Ms Emma Binnie until August 2013) and then to the General Manager Responsible Gambling (Ms Sue Turley until August 2014).
- 8 I did not have any direct reports in any of these roles.

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- 9 I remained in the role of Responsible Gambling Senior Advisor until I was promoted to my current role as General Manager Responsible Gambling for Crown Perth in 2014.

My current role

- 10 I was appointed to my current position of General Manager Responsible Gambling in an acting capacity in 2014, before being appointed permanently to the position later that year.
- 11 The role title was changed in 2019 to General Manager Responsible Gaming, when Crown Perth adopted the term "Responsible Gaming" rather than "Responsible Gambling".
- 12 From 2014 to around early 2017, I reported to Joshua Preston (the Executive General Manager, Legal and Corporate Services, then later the Chief Legal Officer – Australian Resorts). Since around 2017, I have reported to Sonja Bauer (the Group General Manager Responsible Gaming for Australian Resorts).

RG team in Perth

- 13 All other members of the RG team in Perth report to me in my current role.
- 14 Currently, the RG team in Perth consists of:
- a) a team of 10 full time and 2 part time Responsible Gaming Advisors (**RG Advisors**);
 - b) a Responsible Gaming Compliance and Administration Officer. This is a new administrative role within the Perth RG team with responsibility for matters such as completing compliance certificates and surveys, and processing self exclusion and revocation documentation; and
 - c) a Responsible Gaming Administration Officer. This is also a new role, appointed to support the Responsible Gaming Compliance and Administration Officer role.
- 15 I try to maintain a team of RG Advisors with a mix of skill sets and qualifications. Some of my team have degrees in psychology or social work and others come to the team with gaming experience.
- 16 In addition, there is a Responsible Gaming Reporting / Data Manager based in Melbourne (Andrew Krekoukias), who was appointed in April this year. The position was originally titled Responsible Gaming Data / Reporting and Innovation Co-ordinator. This position is a Crown Group role that reports to the three General Managers Responsible Gaming for Perth (myself), Melbourne and Sydney with daily oversight by the Melbourne General Manager.
- 17 The Perth RG team has access to and consults with two Responsible Gaming Psychologists located in Melbourne (Kate Earl and Susan McNulty). They do not directly report to me. There is also another part-time Psychologist – Research in Melbourne.

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- 18 Crown Perth is currently in the process of recruiting and appointing the following additional roles, all of which will report to me:
- a) a Responsible Gaming Operations Manager, who the RG Advisors will report directly to, and who will manage rostering, internal relationships and stakeholder involvement and internal RG training;
 - b) a Responsible Gaming Evaluation Manager who will be responsible for the evaluation of data to inform RG initiatives; this will be a Crown Group role that reports to the three General Managers, but based in Perth with me providing daily oversight. We are in the process of appointing one of the existing RG Advisors (Jo Hanley) to this role; and
 - c) a part time Responsible Gaming Psychologist – Research.
- 19 There are formal Job Descriptions for all of these roles, which are listed in “**MSF-1**”.

KPIs and bonuses

- 20 My performance is assessed against Key Performance Indicators (**KPIs**). A copy of my latest performance evaluation plan review is [CRW.701.005.5089].
- 21 I was eligible to participate in a Short Term Incentive Program (**STIP**) for the financial years 2015 up to 2019. The requirements for a STIP payment included that Crown Perth and the Business Unit meet financial targets, as well as an assessment of my performance against KPIs. Under this program, I was eligible to receive an incentive payment of up to 10% of my salary.
- 22 I received a discretionary STIP payment in 2016. I also received a bonus in 2017, although the requirements for a STIP payment had not been met due to the financial targets not being met. I have not received any further bonuses.

QUALIFICATIONS, EXPERTISE AND TRAINING*(Questions 8 to 11)*

- 23 I did not have experience in casino operations prior to joining Crown Perth.

Responsible gaming

- 24 I have over 10 years' of experience in RG starting with my role as RG Coordinator in 2010.
- 25 I have been provided with 'on the job' training and mentoring by the previous Managers for Responsible Gaming, Ms Pamela Evans (Degree in Social Work) and Emma Binnie (Degree in Psychology), and by Senior Responsible Gaming Advisor Ms Jessica Turner (Degree in Psychology). I was also mentored by Mr Michael Egan, the Senior Manager Gaming

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Regulations, who had a background at the regulator and who I understand was instrumental in writing the *Casino Control Act 1984* (WA).

- 26 I continue to develop my RG knowledge through my ongoing role and through my regular consultation with the Crown Psychologists in Melbourne, and with the independent Responsible Gaming Advisory Panel (which I discuss later in my statement).
- 27 I am a Member of the National Association for Gambling Studies Inc and a Member of the Australasian Gaming Council.
- 28 I have completed the following courses during my time in the RG team:
- a) Crown's Leadership Development Program;
 - b) Diploma in Leadership and Management;
 - c) Negotiation and Crisis Intervention;
 - d) Domestic and Family Violence Response;
 - e) ASIST (Applied Suicide Intervention Skills Training);
 - f) Mental Health First Aid; and
 - g) Body Language Awareness and Profiling.
- 29 All these courses were delivered by external providers, except the Body Language Awareness and Profiling course.

AML/CTF

- 30 I have completed Crown's standard online AML course on a number of occasions. I last completed this course in July 2019.
- 31 I have also completed face to face AML/CTF Business Operations Training and RG Targeted AML/CTF Training. I last completed this training in November 2020.

EGM and FATG risk management

- 32 I do not have any training in Electronic Gaming Machine (**EGM**) and Fully Automated Table Game risk management.
- 33 I have shadowed Gaming Attendants to observe their interactions with customers and observe customer behaviour whilst playing EGMs. I have had informal sessions with the Gaming Machines team to understand the product. I have also attended the EGM 'test bed' to gain a better understanding of the mechanics and operation of EGMs.

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ICB and junkets

- 34 I have not had any specific training in International Commission Business or junket operations risk management.

REGULAR REPORTS FOR SENIOR MANAGERS*(Question 12)*

- 35 I prepare the Responsible Gaming Management Committee Report, which goes in the papers for the Crown Perth Responsible Gaming Management Committee (**RGMC**) meetings held three (3) times per year. I discuss the RGMC and my role within it further below.
- 36 I provide information on Crown Perth's RG key updates, initiatives, programs and statistics, which are incorporated into a report provided to the Crown Resorts Limited Responsible Gaming Committee six (6) times a year. Ms Sonja Bauer, Group General Manager Responsible Gaming, has responsibility for submission of the report.
- 37 The primary source of the RG statistics in these two reports is Crown Perth's incident management system (called iTrak).
- 38 I prepare an Executive Risk and Compliance report that goes to Mr Claude Marais (the General Manager Legal and Compliance). I understand that this report goes to the Executive Risk and Compliance Committee (**ERCC**). I prepare this report twice a year.
- 39 I am emailed copies of the Security shift report, the Pearl Room shift report and the VIP compliance report on a daily basis for my information.

INTERNATIONAL COMMISSION BUSINESS AND JUNKETS*(Questions 13 and 14)*

- 40 There are currently no junkets or international customers at Crown Perth.
- 41 The RG team were not involved in the assessment of junket operators or junket representatives prior to the Crown Group commencing business with them.
- 42 There were no measures taken or procedures adopted by the RG team to identify and record the amount of money lost by junket or premium/privileged international customers. I assume that this data was tracked by the business, but I am not aware of the procedures for doing so.
- 43 Junket and international customers had dedicated rooms and salons. The RG team had free passage into those areas, but the RG team did not routinely attend these areas unless contacted to address a concern.
- 44 Junket and international customers were treated the same as other customers from an RG perspective, in the sense that all staff interacting with them were responsible for identifying any problem gaming concerns and reporting these concerns to the RG team. Junket and

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international customers had Crown Perth staff with them 'around the clock'. They had the attention of a dedicated host, as well as the gaming staff in the room (i.e. the Dealer, Inspectors and Table Games Managers).

- 45 When the RG team is contacted about a junket or international customer (which has occurred but not frequently), the RG team assesses the concern and takes appropriate action based on the individual circumstances of that customer as it would for any other customer.
- 46 One point of difference with international customers is that international customers have historically been exempt of the maximum Play Periods that apply to other customers. The reason for this is that these customers have travelled specifically to the Casino for a limited period for the purposes of gaming. International customers are still formally exempt from Play Periods under the current policy but, at present, there are no international customers. My understanding is that it is still to be determined how Crown Perth will treat international customers going forward. I do not know whether the Play Period exemption will continue to apply.

EXTENT OF GAMBLING RELATED HARM IN WESTERN AUSTRALIA

(Questions 15 and 16)

- 47 The last comprehensive studies into the extent of gaming related harm in Western Australia were the Productivity Commission's Review in 1999 and the Productivity Commission's Inquiry in 2010.
- 48 Crown Perth generally works on the basis of the national problem gaming statistics from the Productivity Commission's reports dated 1999 and 2010 (reference above), but it is unknown whether those statistics accurately reflect the prevalence of problem gaming in Western Australia today. It is understood there has been a substantial uptake in online gaming and wagering in Western Australia and nationally since these reports were produced. It would be beneficial to understand problem gaming prevalence across all forms of gaming/gambling in Western Australia.
- 49 To my knowledge, Crown has not conducted, commissioned or provided data for any research to ascertain the extent of gaming related harm in Western Australia.
- 50 An RG Advisor compiles statistics from the operations of the RG team every month. As I discuss below, these statistics are provided to the regulator on a monthly basis. The statistics are also included (in a different format) in the papers for the RGMC and Crown Resorts Limited Responsible Gaming Committee meetings. I review these statistics to keep informed and to look for any trends or spikes.
- 51 Until now, the consideration of these statistics has been at this general level. One of the reasons for recently creating the Responsible Gaming Reporting / Data Manager role (in Melbourne)

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and the Evaluation Manager (located here in Perth) is for these roles to work together to analyse and evaluate this data to inform our RG practices and initiatives.

TRAINING ON RESPONSIBLE SERVICE OF GAMBLING

(Questions 17 and 18)

Training of RG team

- 52 All RG Advisors receive on the job training.
- 53 When the RG Advisor starts in the role, there is a day session to provide an overview of the role, services and programs available and education of responsible and problematic gaming behaviours. This session includes a presentation and is led by one of the experienced RG Advisors.. The presentation materials used for this session are [CRW.700.011.0977] and [CRW.700.050.0082].
- 54 The new RG Advisors are then trained under the supervision of other team members. They start off by shadowing other RG Advisors. They must observe each of the core tasks involved in the role before progressing to assisting with that task, and then to performing that task under supervision. Finally, they are assessed as to whether they are competent to perform each of the tasks without supervision.
- 55 There is a training checklist that tracks the progress of their training. A copy of the training checklist (which has been recently reworked) is [CRW.701.005.5228].
- 56 Employees can take different lengths of time to complete their training depending on their own prior experience and characteristics and what incidents they get exposure to during their shifts. Recently Crown Perth has adopted a notional training period of six (6) months.
- 57 The RG Advisors (even the experienced ones) continue learning and developing on the job, both through their own experiences and through shared internal learnings as a team. The RG team frequently debriefs as a team after incidents.
- 58 RG Advisors attend a range of external courses and, on occasion, also arrange for external trainers to come in to deliver training to the team as a whole. Some of the training courses that Crown Perth provides to its RG Advisors are:
- a) Body Language Awareness and Profiling;
 - b) ASIST (Applied Suicide Intervention Skills Training);
 - c) Resilience Training – RG;
 - d) AML/CTF Targeted Training – RG;
 - e) Psychological First Aid; and

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f) Accidental Counsellor.

59 I maintain a document setting out the qualifications of the RG Advisors. A copy of the document as at September 2021 is [CRW.701.005.5094].

Training of other Crown employees

60 Every new Crown Perth employee undertakes a 2 day orientation, which includes a 45 minute training session on responsible gaming. This session is delivered in person by one of the members of the RG team. At this session, the RG team hands out a card with the observable signs and the contact details of the RG team, and we encourage employees to put it with their staff ID that they have to carry while at work. A copy of this card is [CRW.701.005.5427].

61 Every employee has to complete an online RG training module when they start at Crown Perth, and then subsequently complete online refresher training. The frequency of the refresher training has recently been changed from every 2 years to annually. The online training takes approximately 30 minutes to complete. The training must be passed with a 100% mark.

62 The RG team provides additional face-to-face RG training to all new security officers, new dealers, existing dealers starting new games, VIP hosts, Crown Rewards hosts and EGM attendants. These sessions run for 30 to 45 minutes. Jo Hanley (one of the experienced RG Advisors with qualifications in providing training) currently heads up the delivery of this additional training.

63 Earlier this year, Crown Perth introduced RG leadership training for managers and supervisors. This is an in-person training program. It currently takes one (1) hour to complete, but will be extended to 1.5 hours. The training is required for all employees in management or supervision roles that have been identified as having RG touchpoints. This training has been delivered to just over 550 Crown Perth employees this year. The training will have to be refreshed every year. Jo Hanley also currently heads up this training.

64 The RG team provided training to the Table Games employees when EFTPOS was introduced at Table Games. All Food and Beverage employees were provided with RG training when EFTPOS was introduced in bars and restaurants. This training was presented by the Managers in Food and Beverage based on materials prepared by the RG team.

65 The current presentation materials for all of the training delivered by the RG team are listed in "MSF-1".

66 The new Responsible Gaming Operations Manager role (once appointed) will be responsible for management of all the RG training sessions.

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Shift briefings

- 67 In addition to formal RG training, the RG team regularly provides short “shift” briefings to front-line staff in a particular department (such as Cage, Crown Rewards, Hosts or EGM Attendants). During these briefings, the RG Advisor may discuss particular RG promotions and initiatives, answer questions or raise customers of particular interest. A key purpose of these briefings (aside from sharing information) is to keep the RG team visible to front-line employees and raise awareness of responsible gaming.
- 68 The RG team usually initiates these shift briefings, but sometimes the briefings are provided on request from the department (such as one held recently for Hotel front office staff). At present, the RG team provides at least one shift briefing a week. They are intended to be more frequent once the new Responsible Gaming Operations Manager starts.
- 69 The RG team has recently started the practice of having an RG Advisor attend the monthly general Table Games and Inspector briefings on a regular basis.

Reoccurring management meetings

- 70 I am a member of the Business Operations Team for Crown Perth, which is made up of senior management at Crown Perth. It currently meets informally for 30 minutes on a weekly basis. It meets formally around three or four times a year.
- 71 I attend a number of regular meetings with the other departments at Crown Perth to discuss current and upcoming initiatives, current environment and general observations, support or training requirements, customer and employee matters.
- a) I have a fortnightly scheduled meeting with the VIP management team for Table Games and EGMs.
 - b) I have separate scheduled meetings every month with each of Mr Blake Vererka (Head of Security Operations) and Mr Greg Bennett (Operations Managers Surveillance).
 - c) I have separate scheduled meetings every two (2) months with each of Mr Brian Lee (General Manager Security and Surveillance), Ms Cori Cairns (EGM Table Games), Mr Shannon Blake (EGM Gaming Machines, who also has responsibility for Crown Rewards) and Ms Kelly Townson (GM Marketing) (with whom I meet every three (3) months).
 - d) I attend the monthly Gaming Marketing meetings.
- 72 The RG training and the RG team's interactions with employees seek to reinforce the message that everyone at Crown Perth is responsible for ensuring RG at Perth Casino.

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RESPONSIBLE SERVICE OF GAMBLING FRAMEWORK AT PERTH CASINO*(Questions 19 and 23 and 24)*

- 73 Crown Perth's overarching philosophy to RG is that it is a shared responsibility between individuals, the community, the gaming industry and the Government.

RG policies and procedures

- 74 Crown Perth's RG policies and procedures are currently documented in the following key documents:
- a) The Crown Perth's Responsible Gaming Code of Conduct (**Code**) is the customer facing document setting out Crown Perth's RG framework [**CRW.700.025.0133**]. This document was re-written in 2017, to form the comprehensive version of the Code used today. It was previously named the Code of Practice.
 - b) The Crown Resorts Responsible Gaming Policy is the overarching RG policy for all Crown properties [**CRW.510.045.0192**]. This document was released in December 2020.
 - c) Sitting below the overall Responsible Gaming Policy are more detailed documented procedures. Until recently, these procedures were documented in Standard Operating Procedures (SOPs). The RG team in Perth are currently in the processing of re-writing all the RG SOPs into Workplace Instructions. The aim is for the Workplace Instructions to cover all applicable material (such as relevant initiatives, processes and training) for each applicable topic in one document. I approved the documents, which are now being adopted for use in Melbourne and Sydney. The current Workplace Instructions in place are listed in "**MSF-1**".
 - d) The RG team also has checklists for many of our common tasks. The key checklists are listed in "**MSF-1**".
- 75 The Employee Code of Conduct [**CRW.701.002.0311**] also stipulates that all employees have RG responsibilities and are required to undertake RG training and comply with the Responsible Gaming Code of Conduct.
- 76 Previously, RG maintained a Crown Perth Responsible Gaming Operations Manual. It has not been updated since 2019 and its use was discontinued on the basis that the Crown Resorts Responsible Gaming Policy would be developed and the contents would largely be addressed in Group or property based policies. It was also considered that the document (over 70 pages) was encumbering.
- 77 Crown Perth had a Responsible Gaming Strategic Plan in place from 2006 to 2016, which was reviewed every three years. The Strategic Plan for 2011 – 2013 was rolled over to 2014 – 2016

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soon after I was appointed to my current role. Following this, the Crown Perth Strategic Plan was discontinued on the basis that a Crown Resorts Strategic Plan would be developed for both Melbourne and Perth.

- 78 I was involved in a 2 day workshop in Melbourne in around October 2019 to develop this plan. The workshop was also attended by the Group General Manager Responsible Gaming, the Responsible Gaming Operations Manager (Melbourne) at the time, the Responsible Gaming Psychologists, and an external consultant (who from memory specialised in corporate strategic planning). A draft Crown Resorts plan was developed and submitted to Mr Joshua Preston in February 2019. The resultant plan was finalised for Crown Melbourne into the Crown Melbourne Strategic Plan, which is [CRW.510.030.1382]. In the absence of a Crown Resorts or Perth plan, I have used the Melbourne plan to guide the strategic direction of Perth. The finalisation of the plan for Crown Perth is currently on hold due to the recent enhancements and changes to the RG programs.

RG governance

- 79 When I joined the RG team, Mr Michael Egan took a lead role in responsibility for RG at Crown Perth alongside Mr Joshua Preston. That responsibility then moved solely to Mr Joshua Preston's position, under the ultimate direction of Mr Barry Felstead. Under the current structure, the positions with RG responsibility (above my role) are Ms Sonja Bauer and Mr Steven Blackburn at a Group level. From a Crown Perth operational perspective, Mr Lonnie Bossi also takes a lead role.
- 80 There are a number of committees and groups with oversight of RG for Crown Perth.
- 81 There is a Responsible Gaming Working Operations Group which meets once a week. The working group is made up of myself, the General Managers for Responsible Gaming from Melbourne and Sydney, and the two Responsible Gaming Psychologists in Melbourne. The working group shares information, considers new initiatives and addresses requests from Ms Sonja Bauer. The working group is chiefly responsible for progressing Crown's response to the recommendations from the Responsible Gaming Advisory Panel (discussed below). The working group reports to Ms Sonja Bauer, with an informal catch up with her once a week.
- 82 The Crown Perth RGMC meets three (3) times a year. There is a Charter for the Crown Perth RGMC, which was updated this year [CRW.700.010.0182].
- 83 The meetings are attended by General Manager level and above representatives for all the various Crown Perth teams (such as Gaming, Marketing, Cage, Legal, Compliance, Security and Surveillance). The meetings provide a formal setting for various Crown Perth business units to come together to monitor and review our responsible gaming programs, services and

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initiatives, statistics and research ensuring a focus on harm minimisation and responsible gaming practices.

- 84 I have attended these meetings since moving to my current role in 2014. I am responsible for preparation of the papers and have been the Chair since April 2020, previously held by Mr Joshua Preston.
- 85 As previously mentioned, I am responsible for the preparation of the papers for these meetings. Topics in the papers include, but not limited to: action items, Crown Resorts updates, training, customer and stakeholder engagement, new or proposed initiatives, statistics, research updates and environment scans and matters for the consideration of the committee. Specific RG research summaries (prepared by the Australasian Gaming Council) and environment scans that are particularly relevant to the casino industry or new and emerging themes are highlighted to the Committee.
- 86 The Crown Resorts Limited Responsible Gaming Committee meets six (6) times a year. There is a Charter for this committee [CRW.512.016.0006]. It reports through to the Crown Resorts Limited Board. I attend meetings of this committee as an invitee. As noted above, I contribute to the Perth element of the papers for this committee.
- 87 Information from the Crown Resorts Limited Responsible Gaming Committee is fed back to the RGMC and vice versa.

Responsible Gaming Advisory Panel

- 88 Crown has also established an independent Responsible Gaming Advisory Panel (**Panel**) to look broadly at both Crown Perth and Crown Melbourne RG practices to determine what is best practice and to inform Crown's practices. The Terms of Reference for the Panel are [CRW.700.010.0186].
- 89 The members of the Panel are Professor Alexander Blaszczyński PhD (Chair), Professor Paul Delfabro PhD and Professor Lia Nower JD, PhD.
- 90 In 2019, Crown provided the Panel with documentation around Crown Perth and Crown Melbourne's RG policies and procedures, and with an overview of practice during a 2 to 3 day session in Melbourne. I attended this session.
- 91 In March 2020, the Panel provided a draft report containing 17 recommendations on improvements to Crown's RG policies and procedures. The Panel provided a final report in August 2020. A copy of the final report is [CRW.507.001.1078]. Crown has implemented some recommendations and is currently working through implementing the remaining recommendations, with the Working Operations Group taking the lead on implementation. The

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Working Operations Group maintain a document tracking Crown's implementation of the recommendations. A current copy of that document is [CRW.701.005.5253].

- 92 The Panel provides an ongoing advisory role to Crown. There have been a number of meetings between the Working Operations Group and the Panel to talk through the 17 recommendations and consult on other matters. On occasion, the Working Operations Group meets with the Panel as a whole and other times just with Professor Blaszczyński (Chair), or Professor Blaszczyński and Professor Delfabro.
- 93 Outside of the recommendations, Crown and Crown Perth has separately engaged Professor Blaszczyński to provide advice on various matters.
- 94 The complete Panel has attended one of the Crown Resort Limited Responsible Gaming Committee meetings, and Professor Blaszczyński has attended these meetings on two other occasions to my recollection.
- 95 I understand Professor Blaszczyński has been consulted by Mr Nic Emery (Chief Marketing Officer), Ms Sonja Bauer and Mr Steven Blackburn on other occasions recently, but I am not directly involved in that consultation.

Responsible Gaming Centre

- 96 The RG team operates out of the Responsible Gaming Centre (**RG Centre**). The RG Centre opened in around 2009.
- 97 Customers can visit the RG Centre to get information about RG practices and programs, such as self exclusion, to speak with an RG Advisor or get referrals to support services. Any customers who ask Crown Perth employees for responsible gaming information or for assistance with their gaming behaviour are referred to the RG team.
- 98 The RG team is available on-site 24 hours a day, seven days a week. There has been a 24 hour RG presence at Crown Perth since September 2012.
- 99 At present, there are generally two or three RG Advisors on duty for each shift. However, this will increase to three RG Advisors for all shifts once we have recruited sufficient RG Advisors to fill the additional shifts.
- 100 There is a 1800 hotline number for customers to call the RG Centre to seek RG information or assistance. Information is also available via our website www.gamblersresponsibly.com.au or via crownperth.com.au.

Observing customers by staff for concerning behaviours

- 101 All Crown Perth employees are trained in the 13 observable signs (potential concerning behaviour indicators) of problem gaming. All employees on the gaming floor are expected to

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observe customers for concerning behaviours (such as agitation, overstimulation, or concerning comments such as "I should be at work" or "my wife will be angry with me") and report any concerning behaviour to the RG team as soon as possible. The employee (or their supervisor) reports the issue by calling the RG team, activating an alert button (at Table Games) which sends an alert to the RG team's mobile phone, or speaking to an RG Advisor on the floor.

102 When the RG team receives an alert, the general practice is for an RG Advisor to call the Inspector and get further information about the incident and the individual; they then perform a search in iTrak and SYCO (Crown's customer membership database) to ascertain what information is available about the individual. The RG Advisor then attends the gaming floor, speaks with Gaming employees, observes the customer and has a conversation with the customer once Security is present to assist. Based on the behaviour observed and the discussion with the customer, the RG Advisor may then:

- a) provide the customer with information about responsible gaming practices, RG programs and external support services;
- b) invite the customer to attend a meeting at the RGC to discuss concerns related to their gaming; or
- c) gather further information about the customer's behaviour through a review of their gaming history on SYCO, ongoing observations and discussions with employees. Our framework is based on being pro-active; we take account of any information provided or available to us about a customer, which is used to create a profile.

103 Each time an incident of problem gaming behaviour is reported or identified, the RG team creates a concerning behaviour report in iTrak.

104 The RG Advisors walk the gaming floor throughout the day to observe customers, deal with incidents, talk generally to customers and employees and audit all RG collateral to ensure it is available and on display, and signage is operational. The RG Advisors are collectively on the gaming floor a minimum of approximately 20 times a day responding to incidents and information, and undertaking observations and the like. This is a key component of the role and provides RG visibility and presence on the gaming floors.

Recording incidents in iTrak

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106 The RG team uses a common Drive to store customer electronic files which contain file notes, emails, checklists and documentation such as Self Exclusion, Third Party or Revocation Applications, some of which are linked to iTrak incidents.

107 REDACTED
Contains sensitive information

Breaks in play (temporary barring)

108 An RG Advisor can ask a customer to leave the Casino, at any point in time, and take a 24 hour break in play if the RG Advisors deems it necessary based on an assessment of the customer's behaviour.

109 There is no formal documentation for a break in play. The RG Advisor attends with Security and verbally requests the customer leave the gaming area and not return for 24 hours.

110 The customer will be placed on a paging alert. An email is sent to the business with a photo of the customer, advising the customer is not permitted to return to the Casino for 24 hours. Employees are instructed to contact the RG team immediately if the customer is seen on site prior to the expiry of the enforced break in play.

111 If the customer breaches the 24 hour break in play, the RG team treat it as a concerning behaviour incident. The customer may be requested to leave and not return until the time stated (i.e. the expiry of the 24 hour period) when the enforced break was applied. In some circumstances the enforced break may be extended to ensure a sufficient break has occurred.

112 The RG Team does not currently report the statistics for breaks in play in its general RG statistics.

Follow up meetings with the RG team

113 If, after attending an incident, the RG Advisor is not satisfied that RG concerns are alleviated or there have been multiple incidents of a similar nature, the general practice is for the RG Advisor to ask the customer to leave the Casino, and not return to the Casino until the matter has been reviewed by management or the customer attends a meeting with the RG team. The customer will be asked to book in a meeting with the RG team after a four (4) week period.

114 The four (4) week period is applied to give the customer an opportunity to take a break in play and reflect on their gaming behaviour outside of the casino environment.

115 As occurs for the 24 hour break in play, the customer will be placed on a paging alert. The customer will not be permitted to return to the Casino unless RG concerns are alleviated after a meeting with an RG Advisor. If the customer refuses to attend a meeting with an RG Advisor,

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the customer would be issued with an exclusion (NRL). Again, the RG Team does not currently report the statistics for these types of breaks in play in its general RG statistics.

- 116 The RG team use checklists to record where the incident is at in their lifecycle. A completed checklist is saved to the customer's file. The RG team uses an outlook calendar to schedule tasks relating to an incident.

Play periods policy

- 117 Under the current Crown Play Period policy, domestic and interstate customers are only permitted to remain on site for a maximum of 18 hours. The Workplace Instruction for the current Play Period policy is [CRW.700.033.0944].

- 118 The RG team use a system called Splunk that monitors how long Crown Reward's members have spent on site. The data is drawn from 'logs' drawn from SYCO, ATOM and IGT, and is shown as live information. Various alerts are sent, including to the RG team via MS Teams. These alerts are currently based on length of time since a customer's first rating (i.e. from the first time a customer used their Crown Rewards card on a gaming product):

- a) When a customer has been on site for 12 hours, an alert is sent to the RG team. An RG Advisor reviews the customer's data to get an understanding of their general gaming behaviour and any past RG history. The RG Advisor then attends to observe and assess the customer. The RG Advisor will interact with the customer about responsible gaming practices and information on the first occasion that the customer triggers a 12 hour alert (in a 12 month period), or if concerns are identified on subsequent alerts. It is a case-by-case determination at the discretion of the RG Advisor as to whether a conversation with the customer, or an intervention, is required.
- b) Further alerts come through at 14 hour and 16 hours. These alerts are managed by the Gaming employees. There is a drop down box on MS Teams that RG and Gaming employees use to record their response to this alert. The RG team are currently working with the Gaming Managers to further train employees in completing this record.
- c) The final alert is sent when a customer has been on site for 18 hours. If the customer has been on site for over 18 hours, an RG Advisor will attend with a Security Officer. The customer will be required to take a 24 hour break from the Casino.

- 119 If a customer is observed to exceed the 18 hour Play Period on a number of occasions, that would prompt the RG team to schedule a meeting to assess the customer from an RG perspective.

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Further reduced play periods parameters

- 120 Crown is currently in the process of implementing reduced Play Periods across all properties.
- 121 The new Play Period Policy will come into effect from 4 October 2021. The current 18 hour policy will be reduced to a new limit of 12 hours for domestic and interstate customers. The approach to international customers is still to be determined. In addition, all customers will be restricted to a cumulative 48 hours on site through a seven (7) day period.
- 122 The automatic alerts will be adjusted to a touchpoint of 3.5 hours of continuous play on one device; and touchpoints of 6 hours, 8 hours, 10 hours, and 12 hours on site. The proposed parameters are as follows:
- a) Time starts to run when a customer cards in on a device (either an EGM, Table Game or Electronic Table Game). Two clocks start running: 'time on device' as well as 'time on site'.
 - b) First alert at 3.5 hours. Any customer that has been on the one device and continuously playing for 3.5 hours; It is intended that this alert will apply for uncarded play, as well as carded play. The approach to monitoring uncarded play is still in development.
 - c) Second alert at 6 hours. Any customer that has been on site for 6 hours regardless of break;
 - d) Third alert at 8 hours. Any customer that has been on site without a 2 hour continuous break;
 - e) Fourth alert at 10 hours. Any customer that has been on site for 10 hours regardless of break; and
 - f) Fifth alert at 12 hours. Any customer that has been on site for 12 hours regardless of break.
 - g) 45 hour alert. Any customer who has been on site for 48 hours in 7 day period.
- 123 It is proposed that the RG team will be responsible for responding to the 6 and 12 hour alerts, with Gaming employees overseeing the response to the 3.5, 8 and 10 hour alerts.
- 124 The following approach is proposed (at least for the transition period while the new policy is trialled):
- a) An RG Advisor will observe the customer at the 6 hour point and have an interaction with them around responsible gaming practices on the first occasion the customer triggers the 6 hour alert (in a 12 month period) and then as deemed to be required.
 - b) A customer who is identified as being on site for over 12 hours is required to take a 24 hour break before returning to the gaming floor.

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- c) A customer who is identified with substantial play but has not exceeded 12 hours is required to take a 12 hour break before returning to the gaming floor.
 - d) A customer displaying observable signs prior to the 12 hour period will be requested to leave if concerns cannot be alleviated.
- 125 The RG team at Crown Perth is currently working in collaboration with Gaming, IT, Marketing, Security and Surveillance departments to effect this change in policy. Consideration is currently being given to how the policy will be applied with respect to local and interstate customers who are staying on site at the Hotel.
- 126 It is proposed to run a marketing campaign for the new policy, similar to the Responsible Practices (a recent campaign that was introduced), which will be communicated to customers with signage and brochures being displayed on site.

Self exclusion

- 127 Crown Perth has a self exclusion program where customers can enter into an agreement with Crown Perth in which they agree to self exclude from the Casino. The process and procedures by which a customer may seek self exclusion are set out in the Workplace Instruction on Self Exclusions [CRW.700.033.0900].
- 128 Self exclusion is for a minimum period of 12 months, but may be put in place for a longer period (such as 2 or 3 years). All customers who self exclude are offered a referral to Gambling Help WA or other relevant support services.
- 129 If a customer breaches their self exclusion, Crown Perth may issue an upgraded exclusion to the customer under s 26(2) of the *Casino Control Act 1984* (WA), which is an involuntary exclusion from the Casino. If a customer breaches the s 26 (2) exclusion, Crown Perth may issue a Notice to Revoke Licence (NRL), which excludes them from the Crown Perth Complex.
- 130 There are multiple avenues for customers to start the self exclusion process. They can do this in person at the RG Centre. Crown Perth also offers the option for customers to start the process over the phone with the RG team, or online via our website. Being able to initiate the process off-site allows the customer to start the process when they are removed from the gaming environment and are in a "cool" state and reflecting on their gaming behaviour.
- 131 Crown Perth promotes the self exclusion program through brochures, online and collateral and signage on-site. The RG team also informs customers of this option when discussing responsible gaming programs and tools to manage their gaming behaviour.
- 132 If an RG Advisor makes an assessment that a customer would benefit from an extended break from gaming, the general practice is to offer the customer an option to self exclude in the first instance. If a customer is not willing to enter into a self exclusion agreement, the customer will

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be informed the matter will be reviewed by management and the customer may be issued an involuntary exclusion. Crown Perth cannot prescribe self exclusion as the customer must enter into the agreement to self exclude of their own will.

- 133 The RG team considers self exclusion to be the best option (rather than going straight to an involuntary barring) because it allows the customer to take ownership and responsibility for their gaming behaviour. Research shows people are more willing to make change if they have identified and accepted that they have issues associated with their gaming behaviour. If exclusion is imposed, it can result in the customer being more resistant to seeking help as they have not acknowledged their behaviour as being problematic.
- 134 There is a Cross Property Exclusion Program in place. Under this program, it is general practice that a customer who self excludes, or is issued with an involuntary exclusion (an NRL or a s 26(2) exclusion), at one property, will also be excluded from all other properties.
- 135 At the time of self exclusion, the RG team offers the customer a follow up call at three (3) months. This provides the opportunity to assess if the individual requires any additional support with their exclusion particularly if they are experiencing urges to attend the Casino.

Time Out exclusions

- 136 Crown Perth has a Time Out Exclusion policy, which allows a customer to voluntarily exclude themselves from the Casino for a period of three (3) months or six (6) months. The processes and practices around this policy are documented in the Workplace Instruction – Time Out Exclusion, a copy of which is [CRW.700.033.0933].
- 137 The Time Out Exclusion option is not advertised internally or externally as the customer needs to meet the criteria for eligibility (assessed as low level concerning gaming behaviour).
- 138 Following the nominated period of the Time Out, the customer must attend a meeting with the RG team prior to being permitted entry to the gaming floor. The RG team must be satisfied the customer is now well positioned to return to gaming. If concerns are identified the customer will be offered the opportunity to self exclude or re-enter in to Time Out as per the terms and conditions outlined in the Workplace Instruction – Time Out Exclusion.

Compulsory exclusion

- 139 The RG team will unilaterally exclude customers from the Perth Casino if the RG team identifies that a customer is experiencing issues with their gaming behaviour and the customer has declined to self exclude or refused to meet with the RG team to discuss concerns identified.

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- 140 Crown Perth uses an NRL to exclude customers for RG reasons, rather than issuing a section 26(2) barring (aside from customers who are barred following breach of a self exclusion).
- 141 The process and procedures by which the RG team involuntarily excludes customers from the Perth Casino are set out in the Workplace Instruction on Involuntary Exclusions [CRW.700.033.0913].

Third party exclusion

- 142 Crown Perth has a program by which third parties (such as a family member or friend of a customer) can apply to have a customer excluded from the Casino.
- 143 Third party exclusions can also be initiated online, by telephone and in person.
- 144 When an enquiry about third party exclusion is received, the general practice is for an RG Advisor to encourage the third party to talk to the customer about their concerns and encourage the customer to self exclude. The RG Advisor will arm the third party with information about the self exclusion program and support options to discuss with the customer.
- 145 The process by which a third party can make the third party exclusion application and the process and procedures followed by the RG team in determining that application, are set out in the Workplace Instruction – Third Party Exclusions, a copy of which is [CRW.700.033.0981].
- 146 Crown Perth uses an NRL to implement a third party exclusion.
- 147 A number of third parties will contact the RG team about concerns with a customer's level of gaming, but not want to proceed with the third party process (which involves a detailed application and a statutory declaration). If that occurs, the RG team will conduct their own investigation by reviewing the customer's play history, any previous RG incidents and by going out to the business for information about the customer where deemed appropriate based on the information provided or known.

Identifying excluded customers or customers of interest

- 148 There are a number of processes and systems in place at Crown Perth to assist in monitoring for excluded customers on the premises:
- 149 When a customer is excluded from the property, the RG team:
- a) obtains a photo of the customer, either taken as part of the self exclusion process or one captured by Surveillance;
 - b) notifies Surveillance and Crown Melbourne;
 - c) enters this information in iTrak;

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- d) sends alerts to the Premium Gaming Hosts if the customer is a VIP customer;
 - e) applies a "stop code" in SYCO and freezes the customer's Crown Rewards account;
and
 - f) if the customer is not an existing Crown Rewards member, the RG team creates a 'dummy account' for them in SYCO to prevent them from opening up an account.
- 150 The Surveillance team uses Facial Recognition Technology (**FRT**) to monitor and identify the customers in the Casino. A pop-up alert occurs if the FRT system identifies an excluded customer. The Surveillance Operator then determines whether FRT has correctly identified the customer.
- 151 If the excluded customer tries to use their Crown Rewards card, then an automatic alert is sent to the RG team and Surveillance.
- 152 Employees also assist in identifying excluded customers who are on site. The Table Games employees have access to iTrak in the pit and can identify people via that system.
- 153 The RG team has initiatives to identify customers on site who are of interest to the RG team but have not been excluded, such as customers who have been asked to take a break in play and schedule an interview with the RG team or customers the RG team are trying to identify:
- a) The RG team sends out an alert email to employees listing the customers of interest, with a request to contact the RG team if the person is identified at the Casino.
 - b) The RG team maintains a document called FACES, with photos of all of persons of interest to the RG team. This document is updated on average once or twice a month. This document is emailed to Security and Surveillance, Table games and Gaming Machines and saved on a common drive accessible by these business units.
 - c) There is an iPad in the scheduling office for Table Games, which cycles through the persons of interest to the RG team. Gaming Machines (including Crown Rewards) has a similar set up on a TV monitor.
 - d) The RG team can institute an alert for the person of interest in SYCO that triggers an alert to the RG team if the person uses their Crown Rewards card.

Revocation process for all exclusions

- 154 All customers who have self excluded or have been issued an involuntary exclusion (whether by third party exclusion, an NRL or a s 26(2) barring) must go through a revocation process if they want to return to gaming at the Casino, with the exception of those customers issued an exclusion until such time as they have met with RG and concerns have been alleviated.

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- 155 Customers cannot apply to revoke their exclusion until the period of the exclusion (which is a minimum of 12 months) has expired. Their exclusion is not automatically rescinded at the end of this period; they must apply and go through the revocation process.
- 156 A customer who wants to apply for a revocation has to complete an application and undertake an assessment from a qualified professional (Gambling Help WA, Social Worker, Psychologist or General Practitioner).
- 157 When the revocation application and a report from the qualified professional is received, an RG Advisor assesses the application to determine if the application will proceed to interview. If it is determined the applicant does not satisfy the criteria for revocation, the application will be declined at this stage without progressing to interview. Applications which are progressed to interview require the applicant to attend a meeting in person (where possible) to discuss their motivation to return to gaming, how their situation has changed since exclusion, support available and confirm their strategies for their return. The RG Advisor will write a report based on the information collected at interview, the report for the qualified professional and information known to Crown about the applicant. The report contains a recommendation on the application. The application then goes to a Revocation Committee for determination.
- 158 The Revocation Committee meets once a month. I chair that Committee. Members of the Revocation Committee include the two Responsible Gaming Psychologists (Kate Earl and Susan McNulty), and Legal Services and Security and Surveillance representatives. Gaming representatives are invitees of the Committee but not Committee members. The charter for the Committee is [CRW.700.010.0191].
- 159 The detailed processes and procedures applying to revocation applications are detailed in the Workplace Instruction on Revocations [CRW.700.033.0952].
- 160 Following a successful revocation application, the applicant is required to sign an approval letter acknowledging the terms and conditions of their approval. The letter outlines the customer's strategies for their return to gaming (e.g. frequency of attendance, time on site and financial limit) which were (generally) established with their qualified professional and confirmed during the revocation meeting with the RG Advisor. The terms and conditions of approval state the customer must adhere to the conditions for a minimum period of twelve (12) months.
- 161 The customer is required to attend a mandatory three month follow up face to face meeting (where possible) with an RG Advisor to discuss their return to gaming. Prior to the meeting, the RG Advisor will complete a review of the customer's strategies and compare this to SYCO data and any other information in relation to their attendance including observations made by the RG team or other employees. The RG Advisor or customer may determine further support or follow up is required. If a customer is not adhering to their strategies, a warning will be issued

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and a concerning behaviour report will be raised. RG will continue to monitor and take action as required, including re-instating the exclusion where deemed necessary.

Play safe limits

- 162 Crown Rewards members can set money limits (daily loss) and time limits (daily hours) to apply to their gaming on EGMs and Electronic Table Games (**ETGs**). This initiative is called “play safe limits”.
- 163 Play safe limits are a voluntary tool to assist customers in managing their own play. In discussions with customers, the RG Advisors will put the play safe limits forward as a tool to manage gaming behaviour if considered appropriate.
- 164 Customers wanting to set or change play safe limits can have this done by employees at the Crown Rewards desk or at the RGC. A new or reduced play safe limit takes effect immediately. Customers cannot cancel or increase the limits immediately; these changes take effect from the following day.
- 165 If a customer reaches a limit, a message comes up on the gaming machine informing them. The customer can determine to continue to play, but exceeding a limit stops the customer from collecting points on the Crown Rewards program. The RG team also receives an automatically generated alert if a limit is exceeded. The alert comes by text message and via email to the RG team. The instruction to the RG team is to attend and observe the customer each time a customer triggers an alert (reaches limit).
- 166 Alerts are saved in the electronic file for the customer. If a customer exceeds a limit on three (3) or more occasions in a reasonable amount of time, an RG Advisor will attend and have a conversation with the customer and assess them from an RG perspective.
- 167 Play safe limits have not had much uptake. This is believed to be associated with stigma attached to the program as it is considered to be a tool for problem gamers. The RG team ran a marketing campaign in around August this year to raise awareness of the initiative to try to improve uptake by promoting it as a tool to assist customers to self-manage their gaming
- 168 The procedures that Crown Rewards employees are required to follow in applying and editing play safe limits are documented in the Crown Rewards SOP “Applying Play Safe Limits”, which was recently revised, a copy of which is [CRW.701.005.5100]. These procedures include the RG team’s instructions to the Crown Rewards employees about when to contact the RG team about a customer seeking to apply or change play safe limits.

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Player activity statements

- 169 Customers can print player activity statements at a Voucher Issuance Kiosk (**VIK**) machine located on the gaming floor, or with assistance from employees at the RGC or the Crown Rewards desk.
- 170 Player activity statements show information about the customer's level of play (including wins and losses) on EMGs and ETGs for the period of the statement. The statements only use information for the "carded" or "rated" sessions in which the customer has played has used a Crown Rewards card.
- 171 The number of player activity statements printed in the last few years are:
- a) 2018 – 59,247;
 - b) 2019 – 60,876;
 - c) 2020 – 29,228 (which was affected by COVID closures); and
 - d) 2021 – 20,844.
- 172 In Melbourne, player activity statements are required to be provided to customers annually by regulation.
- 173 Crown Perth does not provide player activity statements to customers automatically.
- 174 In my view, voluntary player activity statements are a useful tool for people to reflect upon how much they have spent, but I am not sure that making statements mandatory would be beneficial. Even if statements were mandated, that would not mean that a customer would read it. If statements were mandated, I would also want to ensure that there were rules as to when and how the statements are provided and used. For example, if a person comes to the RGC to self excludes or discloses problematic gaming behaviour, it would be potentially counterproductive and distressing to the customer to print out a statement to show them their losses. The philosophy of the RG team is based on having conversations with customers in a friendly, non-judgmental way to support and assist them with their gaming behaviour. There may also be a risk that people would move away from carded play if statements were mandatory as people do not necessarily want a trail of their gaming behaviour.

Access to Pearl Room

- 175 All applications for membership to the Pearl Room go through a vetting process by Crown Perth, which includes sign off from each of the AML, Surveillance and the RG teams.
- 176 When an application is received by the RG team for assessment, an RG Advisor reviews the application form and the available data on the applicant in SYCO and information on iTrak. The RG Advisor may call or meet with the customer to understand the customer's situation better,

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if the RG Advisor considers it necessary to do so. If the applicant has previously been excluded for RG reasons, the RG Advisor will have a face to face meeting with them before making a recommendation. The RG Advisor will then make a recommendation as to whether the application should be approved.

- 177 I am currently in the process of approving a Workplace Instruction that details the processes and procedures applying to the RG team's consideration of Pearl Room applications, a copy of that document is [CRW.701.005.5266].

Responsible gaming information and messaging

- 178 There is RG messaging reminding customers to gamble responsibly, or providing information about how to contact the RG team and Gambling Help helpline, throughout the Perth Casino. A copy of the creative for the RG contact information is document [CRW.701.005.5226].
- 179 There is RG messaging and information on EGMs and ETGs, on signs above table games, on rotating signage, on the gaming information terminals and on ATMs. The RG team also has exclusive use of the backs of toilet doors in gaming areas for RG messaging.
- 180 Crown Perth tries to keep the RG messaging relevant and dynamic. The Crown Perth messaging takes a supportive approach without being dismissive of the seriousness of issue. For example, Crown Perth recently introduced a campaign to try to normalise a conversation with the RG team to remove any stigma associated with possible interactions (with messages "we're here to talk" and "we're here to listen"). The 'creatives' for this campaign are documents [CRW.701.005.5241] and [CRW.701.005.5227].
- 181 The RG team produces a number of brochures promoting responsible gaming and providing information about Crown Perth's programs, the odds of winning, and RG initiatives (such as play safe limits and player activity statements).
- 182 These brochures are available at the RG Centre and at Crown Rewards desk and at various locations across the casino and are available online for download. An overview of RG programs and services are available in Thai, Vietnamese and Chinese. Customers are encouraged to seek assistance through the RG team if they require translation of any of the RG brochures or collateral.
- 183 The RG team conduct a weekly audit of RG collateral to replenish stock of the brochures and business cards, check RG signage (such as on ATMs, digital signage and toilet doors) and the RG tab on each of the Gaming Information Terminals (**GIT**) is operational.

Other aspects of the RG framework

- 184 There are various other systems in place at Crown Perth that have an RG element.

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- 185 For example, there are transaction limits on ATMs within 40 metres of the gaming floor (\$400 per day) and limits on EFTPOS at Table Games (\$400 per transaction and a \$500 per day) and a cash out limit for EFTPOS at bars and restaurants at the Casino (\$400 per transaction and a \$500 per day). The facility at restaurants and bars is not currently operational.
- 186 Customers who have received large pay-outs of \$5000 or more on the main casino floor and \$10,000 or more in the Pearl Room, are offered an opportunity to 'cool off' by taking payment in part or full by cheque or funds transfer.

IMPORTANCE PLACED ON RG*(Question 20)*

- 187 My view, from the dealings that I have had with the Executive team at Crown Perth and with other departments such as Gaming and VIP, has always been that importance is placed on RG at the Perth Casino. My impression has always been that the role of RG is well respected within the business. I remain of this view, although the recent Royal Commissions has raised questions as to whether there are gaps that need to be considered and worked through. I am fully supportive of exploring these comments and observations and have already begun to do so through conversations with a number of business units.
- 188 I have previously had concerns that the RG team in Perth is not sufficiently resourced or remunerated.
- 189 The remuneration of the RG team has recently been reviewed and increases have been implemented from 1 July 2021. My view is that the remuneration is now appropriate.
- 190 There has been a substantial increase in the resourcing of the RG team over the last year. Under the recent uplifts, there will now be three (3) RG Advisors on every shift, increased from two (2). I cannot yet evaluate whether the increased resourcing is sufficient; there are a number of factors to consider including the introduction of the reduced Play Period Policy. Once the RG Enhancements and the recommendations of the Responsible Gaming Advisory Panel have been implemented an evaluation of resourcing should be undertaken to determine if further resourcing is required.

CONSULTATION OF THE RG TEAM*(Question 21)*

- 191 In my opinion, the RG team is regularly consulted or involved in decisions affecting gaming operations at the Perth Casino.
- 192 For example, I am consulted with respect to marketing initiatives as I explain below. The RG team approves all applications to the Pearl Room as I explain above. I represented the RG team in the working group with respect to the implementation of EFTPOS at Table Games. I

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was requested to review a proposal for the introduction of a skilled based EGM game as this was a variation to the traditional EGMs currently available in the Casino.

193 As noted above, I represent the RG team on the Business Operations Team for Crown Perth, and I am involved in numerous regular meetings with the other departments at Crown Perth.

Selection of EGM games

194 The RG team is not generally consulted in the selection of new EGM games to be offered at the Perth Casino, or involved in the approval process for them.

195 I recall one occasion in the last year where RG input was sought when Crown Perth was considering introducing an EGM game with a skill-based component. I recall having a meeting with Mr James Sullivan and Ms Sasha Grist to discuss the RG implications. An academic, Dr Sally Gainsbury from the University of Sydney, had conducted an evaluation on the RG implications and considerations of the game. My recollection is that Crown Perth did not proceed with this game.

196 Mr Paul Hulme, former Gaming and Regulatory Compliance Manager would occasionally consult with me verbally about operational and regulatory matters.

197 My understanding is there are National Standards and requirements in the WA Appendix that the manufacturers have to comply with for all new EGM games developed for the Perth Casino.

DATA ANALYSIS OF CUSTOMER GAMBLING BY RG TEAM

(Question 22)

198 The RG team has not historically been provided with analysis of customer gaming along the lines of the "top players" spreadsheets.

199 The RG team monitors the "live" gaming data (through Splunk) as part of our day-to-day operations and reviews customer play history when assessing an individual from an RG perspective. But the RG team has not historically focused on analysis of customer gaming data to assist in identifying problem gamblers.

200 In around 2017, Crown Melbourne's Customer Analytics team started developing a predictive data modelling tool called the 'Crown Model'. The tool uses 'rated play' data to predict customers that may be at risk of problem gaming. The Crown Model was trialled during 2018 and 2019. It has been operational (on a trial basis) in Melbourne since June 2018. Further development and refinement of the Crown Model was then delayed due to lengthy COVID closure of the Melbourne Casino.

201 My general understanding of how the 'Crown Model' works in Melbourne is that the Customer Analytics team periodically generates a spreadsheet list of customers from the 'Crown Model'

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based on set parameters. The RG team then reviews the list of customers and engages with the identified customers where those customers have not already been recently assessed for RG concerns. The RG team then puts responses in the spreadsheet, which are returned to the Customer Analytics team who input the data back into the Crown Model and then re-run a new spreadsheet list for the RG team, starting the cycle again.

202 Crown Perth's Customer Analytics team (led by Ms Danielle Reynolds, Group General Manager Customer Analytics, Strategy and Finance) is in the process of building the Perth version of the 'Crown Model'. I understand that work was required to adapt the 'Crown Model' for the Crown Perth customer base and gaming environment. I understand that the Perth 'Crown Model' is intended to go live in the next few weeks on a trial basis. There will then need to be ongoing work with respect to its development and implementation from an operational perspective. It is proposed to have a trial period of six (6) months when it goes into operation.

203 I am currently working with Ms Danielle Reynolds to develop a periodic report (or dashboard) that will provide meaningful data analysis to inform the RG team on a regular basis about gaming behaviours of the customer base.

204 Ms Reynolds has recently been appointed as a new member of the RGMC in order to bring Customer Analytics expertise and input to the RGMC meetings.

STATISTICS ON CUSTOMERS EXCLUDED AND BARRED IN PAST 5 YEARS

(Question 25)

205 I have compiled a document (with the assistance of my team) showing the RG team's exclusion and revocation statistics from 2016 to 2021 for the Perth Casino (annexed to my statement at 'MSF-2'). None of the figures in this document include the customers who are excluded at Perth Casino under the Cross Property Exclusion Policy as a result of their exclusion at Crown Melbourne.

206 The table shows:

- a) the number of customers who have self excluded from the Perth Casino in each year; all self exclusions are for a minimum of twelve (12) months;
- b) the number of customers who have been involuntarily excluded from the Perth Casino for RG reasons in each year, broken down into:
 - (i) exclusion under s 26(2) of the *Casino Control Act* for RG concerns (other than up-grades for breaches of self exclusions); since 2019, the general practice of the RG team has been to issue NRLs rather than s 26(2) exclusions;
 - (ii) customers who have been issued Notice Revoking Licences (NRL) for RG concerns;
- c) the reason for the involuntary exclusion broken down into:

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- (i) concerning behaviour report (CBR) exclusions, where the RG team has initiated the exclusion;
 - (ii) third party exclusions.
- d) the number of customers who have agreed to a time out for a period of three (3) months or six (6) months in each year;
- e) the number of customers who have applied to revoke their exclusions in each year
- f) the number of applications approved by the Revocation Committee in that year;
- g) the number of applications that were declined in that year;
- h) the number of customers in each year who have had their self exclusions upgraded in an involuntary barring under s 26(2) of the *Casino Control Act* due to breach of their self exclusion agreement; and
- i) the RG team are unable to provide accurate figures for the number of customers who had had their RG related s 26(2) exclusions upgraded to an NRL due to breach of a s 26(2). That is because the upgrades from a s 26(2) to an NRL for RG concerns are not separately recorded from those for Security concerns. The NRL for RG breach upgrades are not otherwise included in the statistics provided in the table.

207 This information has been extracted from iTrak.

RG PROGRAM ENHANCEMENTS

(Question 26)

- 208 I had some involvement in the enhancements to the RG program that were approved by the Crown Resorts Board in May 2021. I did not see the presentation or paper that went to the Board at that time; when I refer to the enhancements, I am referring to the enhancements recorded in [CRW.701.005.5439].
- 209 In around April 2021, the Responsible Gaming General Managers for each of the three properties (myself, Mr Luke Overman and Mr Rowan Cameron) authored a paper on resourcing and remuneration of the RG teams. We prepared the paper in consultation with the two psychologists in Melbourne (Ms Susan McNulty and Ms Kate Earl). Discussions had also occurred previously with Professor Blaszczyński on this topic. I provided this paper to Mr Steven Blackburn and Ms Sonja Bauer on 20 April 2021, a copy of my email and the paper is [CRW.700.046.1457] and [CRW.700.046.1458].
- 210 In around May 2021, the Responsible Gaming General Managers for each of the three properties (myself, Mr Luke Overman and Mr Rowan Cameron) were tasked with putting together a paper setting out all the enhancements that we would recommend to the RG program

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from a "blue sky" perspective. We were asked to prepare this paper by Ms Sonja Bauer, but I understood that the direction came from Mr Steve Blackburn.

- 211 As a group, we consulted with the two psychologists in Melbourne (Ms Susan McNulty and Ms Kate Earl) and came up with a "wish list" of comprehensive RG initiatives and enhancements which we considered would better position Crown in its strive to achieve best practice. A copy of the paper that we prepared and delivered is [CRW.512.124.0064].
- 212 We were provided limited time to prepare this paper due to time constraints, but the items on the "wish list" were informed by our collective experience and knowledge of the relevant research and our collective existing thoughts on best practice and possible enhancements.
- 213 I understand that our paper was used to inform the enhancements approved by the Crown Resorts Board in May 2021. Some of our recommendations were accepted, or accepted with modification; others were not at that point in time.

RSG REVIEW OF ADVERTISING

(Question 27)

- 214 Crown Perth complies with the Advertising Code of Ethics as adopted by the Australian Association of National Advertisers and Regulation 43 of the *Gaming and Wagering Commission Regulations 1988* (WA) as outlined in the Responsible Gaming Code of Conduct. I understand that the Marketing department has a checklist that they have to complete for each marketing campaign to sign off that the campaign is in accordance with these standards and regulations.
- 215 I attend the monthly marketing briefing on promotions for gaming.
- 216 I currently review marketing material for the Crown Perth complex before it goes out on a needs basis. All the marketing material goes to the Legal department for review. Either the Marketing department or the Legal department will flag anything that requires my review or sign off.
- 217 I receive (by email) a copy of all marketing material for Crown Perth for my information. In general, I review and provide commentary if the marketing material is specifically provided to me for review or raised in the monthly marketing briefing.
- 218 I am currently in the process of agreeing a more formal process with Marketing as to what marketing material I should receive for my information or review. For example, I do not need to review marketing material relating to hotels and food and beverage; the focus from an RG perspective should be on gaming promotions.
- 219 When I consider marketing material, my concerns are to identify matters such:
- a) whether the language used in the promotion sets any false or unrealistic expectations;

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- b) whether there is an appropriate weighting between gaming and non-gaming aspects of the promotion;
- c) whether there are any new mechanics as to how a member collects and accrues points, and the RG implications of those new mechanics;
- d) whether there is a cap on the number of entries that a customer can make for a particular promotion (anything uncapped would be concerning from an RG perspective);
- e) whether Crown Perth is encouraging people to spend more than what they ordinarily would (we refer to this as "stretch"). If I have a concern about stretch, I would raise this with the Marketing department and, typically, the Marketing department would confirm that they have looked at the data and Crown Perth is not asking customers to do what they would not ordinarily do in terms of the lifecycle of the member.

220 There is also a Gaming Initiatives Form which was introduced in late 2020 that has been circulated to me by Marketing on a handful of occasions to obtain RG signoff on new or varied products, technologies or procedures. This form is not exclusive to Marketing initiatives.

LOYALTY PROGRAMS

(Questions 28 to 31)

221 My understanding of the purpose of the Crown Rewards program is that it is a program to reward members, offer targeted promotions and facilitate a better understanding of the customer base.

222



223 I have no understanding of the extent to which the Crown Rewards program and members contribute to the earnings and profit of the Perth Casino.

224 I have not had any involvement in designing the Crown Rewards program. I recall being consulted by Mr Richard Smith, Director of Premium Gaming – Gaming Machines about three (3) years ago when the VIP team were considering changes around eligibility criteria for the Pearl Room tiers. I have also attended some meetings with Crown Rewards and other business units to consider the terms and conditions of membership.

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- 225 I have numerous conversations with Ms Melissa Smith, Director of Casino Operations – Gaming Machines about operational aspects (rather than the design and parameter aspects) of the Crown Rewards program.
- 226 My understanding is that there has not been any specific research or analysis conducted to ascertain whether and the extent to which the Crown Rewards program might be contributing to gaming related harm at the Perth Casino. I understand that research of this nature is currently being planned (and undertaken) in accordance with the RG enhancements announced in July 2021. I am not involved in that process.

CORPORATE CULTURE / EMPLOYEES*(Question 32)*

- 227 Whilst revenue and profit are fundamental to the success of any business model, so are the people and the culture within the business. From my observation, Crown Perth has always generally held a healthy respect for their employees, their work conditions and benefits available to employees. As with most businesses, there is always opportunity for improvement over time, which Crown has embraced, particularly in more recent times. It is my opinion Crown is currently well balanced in this regard.

(Question 33)

- 228 My direct exposure to this is limited to RG, where I am of the view matters are fully investigated promptly and discussed with relevant business units Managers, with no adverse consequences for the employee raising the concerns or complaints.

(Question 34)

- 229 As to the process employed by me and my team to protect the welfare of staff:
- a) De-briefing sessions and 'check ins' are regularly undertaken within the RG team;
 - b) Employees are encouraged to use Crown's Employee Assistance Program (provided by Benestar and paid for by Crown) for personal and work-related matters;
 - c) RG Advisors are encouraged to attend professional supervision (provided by Peoplesense and paid for by Crown) as part of their role, to provide an opportunity to de-brief on RG related matters or engage in personal and/or professional development;
 - d) RG Advisors are instructed to alert me immediately to any incidents of a serious nature they are involved in; for example, abusive or aggressive behaviour or where a crisis response is provided, so I can 'check in' on their well-being and discuss support options and incident management.
- 230 As to the adequacy of that process, from my observations, and certainly within the RG team, these processes are adequate and well executed.

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- 231 The process or procedure for receiving misconduct complaints from Perth Casino employees is for a report to be made directly to a Manager, Human Resources Manager, Legal Services or Executive Manager for investigation by an Internal Management Committee,
- 232 As to the person(s) and (or) position(s) responsible for undertaking investigation or review of received misconduct complaints, I am not familiar with the members of the Committee, but understand it to be at Executive level.

OTHER POLICIES AND PROCEDURES*(Question 35)**Junket operations / premium/privileged customers*

- 233 I do not have any knowledge of the due diligence or probity investigations conducted with respect to junket operators, junket representatives or premium/privileged customers at Crown Perth.
- 234 I do not have any knowledge of the approvals and arrangements entered into with respect to junket operators, junket representatives or premium/privileged customers at Crown Perth.

Customers offered access to the Pearl room

- 235 I have explained my understanding of the procedures in place for customers applying for access to the Pearl Room earlier in my statement.
- 236 There is a new policy where current Pearl Room members were required to complete a Source of Wealth form. This process was managed by Mr Wayne Carrie (Process and Compliance Manager Table Games). The RG team was not directly involved in the process, but we have become involved with relation to particular customers who were persons of interest to the RG team, and where Table Games have referred a customer to us on the basis that an RG assessment would be beneficial.

Extending credit to customers

- 237 I understand that Crown Perth has previously offered a Funds Advance Facility to International customers and a Cheque Cashing Facility (**CCF**) to local or interstate customers. I have no personal knowledge about these procedures and policies relating to these facilities.
- 238 I understand that Crown Perth are no longer offering CCF to customers (local and interstate).

Reporting to GWC

- 239 The RG team has reported statistics regarding RG incidents and exclusions to the Gaming and Wagering Commission (**GWC**) on a monthly basis since around 2018.

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- 240 The level of detail included in these statistics has changed over time. I am responsible for collating these statistics (with the assistance of my team) from iTrak and for sending them by letter to the Department of Local Government, Sport and Cultural Industries (which is delivered by email). An example of such a letter is [CRW.709.002.3169].

GRATUITIES

(Additional question from letter dated 9 September 2021)

- 241 I am not involved in the awarding of gratuities to customers. The RG team in Perth is not consulted in relation to the decision to award gratuities to customers.
- 242 If a customer has come to the attention of the RG team and the team are still in the process of investigating the RG concerns, the general practice is for the RG team to instruct VIP Management to suspend providing gratuities to the customer. If the customer is subsequently excluded from the Casino, the customer's Crown Rewards membership is suspended and they would not receive any gratuities

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