

CASE STUDY: MARKETING GUARDRAILS

OVERVIEW

BACKGROUND

Crown Resorts' previous marketing practices were developed and promoted with limited considerations of gaming related harms and insufficient controls and processes to assess the potential for negative impact on customers.

TASK

To establish procedures and controls to ensure Crown Resorts' gaming marketing and promotional activities are designed to minimise potential for gambling harm and not to market to vulnerable groups and customers.

APPROACH

Establish the guiding principles, objectives and core assessment criteria to develop a comprehensive Marketing Guardrails assessment processes where it is mandatory for the Crown PlaySafe Strategy team to assess all marketing and promotional campaigns before they are marketed to customers.

OUTCOME



Decreased potential risk by identifying and revising marketing campaigns that may not align with Crown PlaySafe objectives to promote healthy play and behaviours.



Introduction of Marketing Guardrails training to address the needs of stakeholders for collaboration, quality, governance and auditability.



Continuous evolution with Marketing and data analytic teams periodically conducting post evaluation of campaigns to assess the impact on player health and wellbeing.

BACKGROUND

Every year, Crown spends millions of dollars on marketing campaigns, rewards and other benefits to attract customers. Previous marketing practices were developed and promoted with limited considerations of gaming related harms and lacked appropriate controls to assess the potential for negative impact on customers.

TASK

As part of the Prevention workstream in the Crown PlaySafe Strategy, the Marketing Guardrails initiative was developed to establish procedures and controls to ensure that all gaming marketing and promotional activities are designed to minimise potential for gambling harm and not to market to vulnerable groups and customers.

The goal for Marketing Guardrails was to embed a formalised process across Crown Resorts to assess all current and future marketing campaigns, promotions and materials against a rigorous pre-defined evaluation criteria.

APPROACH

The project team first established the guiding principles to support the development of the core assessment criteria which included key themes and objectives across:

- **Compliance** – ensuring marketing promotions are compliant with relevant law and regulations but also considers the spirit and intent, as well as Crown’s internal policies and values.
- **Transparency & Fairness** – ensuring marketing promotions are fair and reasonable and provide clear and factually accurate details for an ordinary person to make an informed decision.
- **Safer Play & Harm Reduction** – ensuring marketing promotions do not encourage risky behaviours such as playing for extended periods, imply financial rewards or outcomes, and chasing losses.
- **Vulnerable Persons / Protection of Minors** – ensuring marketing promotions do not target guests who are or may be at a higher risk of gambling harm including minors.
- **Commitment to Integrity** – ensuring marketing promotions are not discriminatory and are inclusive and considerate of community views and morals including considerate of different cultures, gender, traditions etc.

Based on these objectives a comprehensive Marketing Guardrails assessment was developed in MS Forms for the Crown PlaySafe Strategy team to complete with considerations given to each criteria point with the following rating/level assigned:

- **Level 1** – cleared with no concerns noted against the assessment criteria.
- **Level 2** – concerns, comments or suggestions requiring further consideration from Marketing team, whether to amend / adjust the campaign.
- **Level 3** – concerns noted against the assessment criteria. The business needs to consider their appetite for gambling harm risks associated with proceeding to market and will require CEO approval to proceed. CEO approved campaigns proceeded to market at this level are recorded in Crown’s Governance, Risk and Compliance system.



Workflows are managed on Power Automate with assessment outcome notifications sent to Crown's Risk function for visibility.

OUTCOME

It is mandatory for Crown Marketing teams to submit all gaming campaigns, promotions, events and collateral for Marketing Guardrails assessment prior to going to market. Any marketing distributed to customers without completing the Marketing Guardrails assessments is deemed as a compliance breach and these are recorded in Crown's Governance, Risk and Compliance system.

Since the inception of Marketing Guardrails in late 2023, a total of 144 marketing concepts and campaigns were assessed across Crown Resorts (as of March 2024) with 55 assessments resulting in Level 2 and 3 outcomes, demonstrating the effectiveness of the Marketing Guardrails and potentially stopping marketing campaigns that may not align with Crown PlaySafe objectives to promote healthy play and behaviours.

Crown PlaySafe team continues to evolve and refine the initiative by engaging with Marketing stakeholders, with multiple enhancements applied in February 2024. Crown PlaySafe, with support from Marketing and data analytic teams periodically conduct post evaluation of campaigns to assess the impact on player health and wellbeing. Data sampling occurs for ongoing campaigns with Level 2 ratings and all campaigns that are approved to proceed with Level 3 ratings.

Marketing Guardrails training has also been developed and implemented to address the needs of stakeholders for collaboration, quality, governance and auditability over the process to ensure Marketing team members align with the Crown PlaySafe code and expected requirements.

Looking ahead, as Crown PlaySafe's research and data analytic capabilities build, and understanding of vulnerabilities increase, post evaluations will evolve based on data collected relating to trends in observable signs, play period alerts, Crown PlaySafe Advisor interactions, player visitations and length of play, and carded play behaviours.

PROJECT TEAM

For more information on Marketing Guardrails, please contact:

JUSTIN BUTLER

Group Senior Manager - Crown PlaySafe Strategy - Policy & Controls
justin.butler@crownresorts.com.au

