



GOVERNMENT OF
WESTERN AUSTRALIA

SUITABILITY ASSESSMENT OF THE PERTH CASINO LICENSEE

Summary of Section 21Q Report

**Gaming and Wagering Commission
of Western Australia**

30 June 2025

This document is a summary of the report prepared by the Gaming and Wagering Commission on 30 June 2025 under section 21Q of the *Casino Control Act 1984 (WA)* and is intended for public release. Sensitive and commercial-in-confidence information has been accordingly removed.

Casino Control Act 1984

21Q. Use of Independent Monitor's reports

- (1) On receiving a report of the Independent Monitor under section 21P, the Commission may, and must on receiving the final report, report to the Minister and make recommendations as to any action that the Commission considers should be taken under section 21B.
- (2) In making a report and recommendations to the Minister under subsection (1), the Commission is not limited to the matters covered by the Independent Monitor's report or bound by any opinion in it.
- (3) A report and recommendations made under subsection (1) are, for the purposes of section 21B, taken to be a report and recommendations made under section 21A(4).
- (4) Nothing in this section or Part prevents the Commission from using information in a report under section 21P for the performance of its other functions under this Act or any other written law relating to gaming.

Commission:

Gary Dreiberger APM, Chairperson
Katie Hodson-Thomas, Deputy Chairperson¹
Samuel Buckeridge
Helen Creed
Colin Murphy PSM
Michael Sarquis

Date of report:

30 June 2025

Recommendations:

For the reasons contained in this report, and insofar as Burswood Nominees Limited (Crown Perth) maintains their current operating standards, the Gaming and Wagering Commission recommends to the Minister for Racing and Gaming:

- (a) Crown Perth is a suitable entity to hold a gaming licence under the *Casino Control Act 1984*; and
- (b) No powers under section 21B of the *Casino Control Act 1984* ought to be exercised in respect to the Perth Casino licensee.

The Gaming and Wagering Commission further provides the following general recommendations:

- (c) The Gaming and Wagering Commission should continue to monitor remediated activities by the Perth Casino licensee to ensure ongoing effectiveness, resourcing and embedment; and
- (d) Pursuant to recommendations by the Perth Casino Royal Commission, the Gaming and Wagering Commission should establish an assurance plan and build capability to monitor remaining remediation activities and Direction requirements.

¹ The Deputy Chairperson, Katie Hodson-Thomas, self-excluded from part of the suitability assessment as a mitigation strategy for a conflict of interest.

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Glossary of terms, abbreviations and acronyms

AML	Anti-Money Laundering
AML/CTF	Anti-Money Laundering / Counter-Terrorism Financing
AUSTRAC	Australian Transaction Reports and Analysis Centre
Bell Inquiry	NICC, <i>2024 Independent Inquiry into The Star</i>
Bergin Inquiry	Report of the Inquiry under s.143 of the <i>Casino Control Act 1992 (NSW)</i>
Commission/GWC	Gaming and Wagering Commission of Western Australia
Crown	Crown Resorts Limited and some or all its subsidiaries in Western Australia, New South Wales, and Victoria
Crown Perth	Any or all of Burswood Limited, Burswood Nominees Limited and Burswood Resort (Management) Limited, or their representatives. In this report, Perth Casino licensee and Crown Perth will be used interchangeably.
Crown Resorts	Crown Resorts Limited
Directions	Directions issued under s.24 of the <i>Casino Control Act 1984</i> (unless otherwise specified)
DLGSC	Department of Local Government, Sport and Cultural Industries – Department of Local Government, Industry Regulation and Safety (LGIRS) from 1 July 2025
EGM	Electronic Gaming Machines
IGF	International Gaming Facility
IM	Independent Monitor
Minister	Minister for Racing and Gaming
ML/TF	Money-Laundering / Terrorism Financing
NICC	New South Wales Independent Casino Commission
PCRC	Perth Casino Royal Commission
Perth Casino	The casino in respect of which a casino gaming licence has been granted under section 21 of the <i>Casino Control Act 1984</i> , also described as Burswood Casino and defined in the PCRC Terms of Reference gazetted on 12 March 2021 as ‘Crown Casino Perth’. In this report, Perth Casino licensee and Crown Perth will be used interchangeably.
RCCOL	Royal Commission into the Casino Operator and Licence (Victoria)
RSG	Responsible Service of Gaming
VGCCC	Victorian Gambling and Casino Control Commission

1. Introduction

From 2019, the conduct and regulatory compliance of Crown Resorts and its local subsidiaries, Crown Perth and Crown Melbourne, with Crown Sydney ready to begin operations in the same year, as well as the individuals involved in their management and operation, underwent public scrutiny.

In January 2020, New South Wales launched their inquiry into Crown Sydney (Bergin Inquiry), which was submitted to the regulator in February 2021. The Bergin Inquiry deemed Crown Sydney unsuitable to continue holding the Barangaroo restricted gaming licence. This decision delayed Crown Sydney's opening until 2022.

In February 2021, the Governor of Victoria established the Royal Commission into the Casino Operator and Licence (Victoria) (RCCOL or Finkelstein Royal Commission).

In March 2021, the Governor of Western Australia appointed the Perth Casino Royal Commission (PCRC), which delivered their final report in March 2022. At the time of the Final Report, Crown Perth, and its group entity Crown Resorts, were determined by the PCRC to be not suitable persons to continue holding a casino licence or to be concerned in or associated with the organisation and conduct of the gaming operations of a licensed casino, and that a two-year pathway to suitability was necessary to remediate and become suitable persons.

The PCRC identified that Perth Casino was involved in money laundering, failed to have appropriate anti-money laundering (AML) measures, permitted junkets linked to criminals, and failed to be transparent and accountable with the regulator on a number of matters, notably allegations of the 2016 arrests of Crown staff in China.

The PCRC provided 59 recommendations to address the deficiencies identified in the inquiry, of which 49 were supported, 8 supported in principle, and one supported in part by the WA government.

During the PCRC, Blackstone (a private equity group) made applications for statutory approvals in New South Wales, Victoria and Western Australia for its proposed acquisition of Crown Resorts (including Crown Perth).

In 2021-22, the New South Wales Independent Casino Commission (NICC), Victorian Independent Liquor and Gaming Authority and the Commission undertook a joint probity assessment of Blackstone.

The then Minister Hon Dr Tony Buti MLA and the Commission granted the statutory approvals required for the acquisition of Crown Perth in June 2022. Statutory approvals which were required for the acquisition in Victoria and NSW respectively were also granted by the relevant bodies.

In October 2022, the Independent Monitor (IM) and the Office of the IM were established for the remediation of the management and operation of the Burswood Casino outlined in the final report of the PCRC. Amendments to the *Casino Control Act 1984* (WA) established the mandate for the IM and set their investigative powers, responsibilities and remit. A suitable remediation plan was approved by the IM, who monitored its implementation during their term. On 31 January 2025, the IM completed the Final Report into the remediation of the management and operation of the Perth Casino. The framework of the IM was:

- For reporting on the remediation of the management and operation of the Perth Casino; and
- For the reporting to inform the Commission's advice to the Minister, and the Minister's decision, as to whether any action should be taken under section 21B in relation to the Perth Casino.

The Minister directed the IM to oversee remediation of specific PCRC recommendations that resulted in Crown Perth being unsuitable, centred on Responsible Service of Gaming (RSG), legislative compliance, culture, integrity, organisational design and governance, and risk management. The IM's final report reflects this mandate and satisfies the requirements under the *Casino Control Act 1984* Part IVA.

Other Australian jurisdictions appointed equivalent officers to the IM. On 13 March 2024, the Victorian Gambling and Casino Control Commission (VGCCC) determined that Crown Melbourne had undergone a successful remediation strategy and has been deemed suitable to continue operating the Melbourne Casino. The NICC reached the decision of finding Crown Sydney suitable to give effect to its restricted gaming licence on 23 April 2024.

Section 21Q of the *Casino Control Act 1984* requires that following the IM's final report, the Commission report to the Minister as to whether any actions need to be exercised under s.21B of the *Casino Control Act 1984*, including a letter of censure, suspension or revocation of the gaming licence (with the prior approval of the Governor), the service of a notice of termination on the parties to any agreement (other than a casino complex agreement) relating to the management or operation of the casino complex and a monetary penalty (with the prior approval of the Governor), based on, but not limited to, the findings of the IM.

During the suitability assessment process, the Commission set out to consider a suite of reasons to be satisfied of Crown Perth's remediation, and they are discussed in this report. These reasons informed the recommendations that the Commission now provides to the Minister as to the remediation of Crown Perth to being suitable persons and any actions that should be taken under s.21B. The Commission also finds that those same reasons also inform the need, after the assessment, to maintain watchful scrutiny and monitoring into the ongoing implementation and embedment of Crown Perth's reforms.

Suitability, however, extends beyond just Crown Perth. This report inquires into the integrity, credibility and stability of the Perth Casino's gaming operations for the benefit of the WA community. Any powers of the Minister ultimately exercised under s.21B of the *Casino Control Act 1984* will need to be exercised in the 'public interest' (as defined in the *Casino Control Act 1984*). The question to answer is ultimately whether to exercise a power under s.21B in the public interest, that is, having regard to the creation and maintenance of public confidence and trust in the credibility, integrity and stability of licensed casino gaming operations.

2. Scope and Methodology

The suitability assessment seeks to:

- (a) Determine whether the Perth Casino licensee complies with relevant legislative and regulatory requirements;

- (b) Consider any evidence, including findings from the IM, on the operation and management of the Perth Casino;
- (c) Consider any information provided by the Perth Casino licensee;
- (d) Ascertain whether the Perth Casino licensee has satisfactorily implemented recommendations from the PCRC to become a suitable person to hold a gaming licence; and
- (e) Consider any other matters that are considered relevant by the Commission.

The Commission has determined that remediation such that Crown and Crown Perth are suitable persons requires a twofold approach, which firstly verifies the robustness of current systems in place by the Perth Casino licensee and then examines ongoing sustainability:

- 1. Current status** – a suitability recommendation requires the Perth Casino licensee to have satisfactorily developed robust systems, including incorporating all aspects of the remediation plans, which adequately address the issues identified by the PCRC. The Commission has sought to assess the findings of the IM and verify continued compliance by the Perth Casino licensee within and beyond matters addressed under the mandate of the IM.
- 2. Future embedment** – suitability necessitates evidence that the Perth Casino licensee will be capable of autonomously and sustainably continuing to embed and maintain the new behaviours and systems within the culture of the organisation. The Commission thus turned to assess evidence of the long-term embedment of the positive change initiated under the oversight of the IM.

The Commission sought assurance that once the IM ceased oversight, and following the suitability assessment, the Perth Casino licensee would remain capable and willing to continue operating the casino to a satisfactory and regulatory-compliant standard without regressing to the poor standards identified by the PCRC.

Assurance of commitment to the positive behaviours initiated during remediation was sought by:

- (a) analysing evidence of continuous work and resourcing of projects initiated during the remediation period, including closure of outstanding remediation projects due for finalisation following the IM's term; and
- (b) reviewing independent technical reports on Crown's status in progressing the implementation of Directions relating to the Electronic Gaming Machines (EGM) scheme and International Gaming Facility (IGF) (Directions 26 and 27) scheduled to commence after the suitability assessment.

3. Crown Perth's Remediation

Crown Perth has successfully completed most of the remediation projects that formed part of the Remediation Plan approved by the IM. Further, Crown Perth has continued progressing projects after the term of the IM ended, showing continued commitment to transformation.

Work to address remaining PCRC recommendations is still ongoing, and the Commission, DLGSC (LGIRS from 1 July 2025) and Crown Perth will continue to implement these moving forward.

3.1. Remediation Plan under Independent Monitorship

In accordance with legislation and informed by the PCRC Final Report, the IM approved the Crown Perth Remediation Plan on the basis that the outcomes and measures set out in those documents were likely to assist in achieving the remediation of the management and operation of the Perth Casino.

Based on IM findings, Crown Perth has significantly progressed the remediation projects that formed part of Crown Perth's remediation plan.

Since the end of the IM's term, Crown Perth has continued to progress completion of its remaining remediation deliverables. Outstanding deliverables, in part, relate to the implementation of the EGM Scheme by 1 December 2025 (as directed by the Commission), and its embedment by December 2026. The Commission will continue to monitor the implementation of these key deliverables.

Crown is now turning to monitoring embedment of remediation activities. The increased focus on embedment is a positive development and consistent with the expectation that Crown Perth should ensure the permeation of remediation measures into its operations and management.

In the aggregate, the Commission finds that Crown Perth has adequately overseen, and continues to oversee, the implementation of remediation projects in response to the PCRC and other measures (referred to in 4.2) to a satisfactory standard. There is evidence-based assurance that Crown Perth has successfully remediated the deficiencies identified by the PCRC and the IM.

The Commission's position is that the positive momentum and focus on remediation during the IM's term should be seized to continue meaningful work to reduce gambling harm at Perth Casino and prevent criminal activity. Stronger control mechanisms are advised to monitor Crown Perth's performance post suitability assessment, including monitoring resourcing allocations, and ensuring Crown Perth avoid the erosion of the newly-instilled values that now make Crown Perth a suitable gaming licensee in the state. As per the Commission 2024 – 2026 Strategic Plan, the Commission intends to develop an assurance plan and capability to monitor the continuation of remediated activities by the Perth Casino to ensure ongoing resourcing, adherence and embedment.

Crown's satisfactory undertaking of their remediation journey to date does not, however, automatically translate to long-term embedment and commitment. The Commission will focus on the long-term commitment by Crown Perth to maintain the course established through the Remediation Plan.

3.2. PCRC recommendations and implementation

The PCRC found systemic failings in Crown Perth's management and operation of the Perth Casino. The key findings identified that Crown Perth:

- Facilitated money laundering through its accounts held in the name of Riverbank Investments;
- Failed to have an effective AML program to ensure suspicious financial transactions were detected, reversed and reported to relevant authorities;
- Permitted junkets with links to criminals to operate at Perth Casino;
- Failed to minimise casino gambling-related harm; and
- Failed to be open and accountable in communications with the Commission, including about allegations made in the media about the 2016 China arrests of Crown employees.

Crown Perth's Remediation Plan contains activities that address PCRC recommendations to improve on the management and operation of the Perth Casino. Crown Perth is now a substantially different organisation to the one operating before the PCRC and has addressed the matters identified in the PCRC and other expert reports. The IM noted the Perth Casino licensee had progressed satisfactorily in incorporating them into their remediation projects and addressing them at an organisational level.

After this suitability assessment, the ongoing implementation and embedment of PCRC recommendations, in particular the ones that relate to Directions issued by the Commission around the EGM Scheme and IGF requirements, will require Crown Perth to continue their commitment to ensure delivery timelines are met, and for the Commission and Racing, Gaming and Liquor (RGL) to ensure that the program of works provided by Crown Perth is being followed.

4. Responsible service of gaming

Crown Perth has embarked on a successful remediation of their RSG failings by establishing the properly resourced 'Crown PlaySafe' program, which shows encouraging signs of effectiveness.

Directions issued by the Commission, particularly around the EGM Scheme and IGF requirements, will further contribute to harm minimisation for casino patrons.

4.1. Crown Perth and Responsible Service of Gaming uplift

The PCRC reprimanded Crown Perth's approach to gambling harm by identifying a culture within the organisation that 'prioritised profit over harm minimisation'. Existing measures were inadequate and under-resourced, while the casino operator deliberately induced patrons to gamble excessively via promotions, gifts and incentives.

The remediation undertaken by Crown Perth since the PCRC to improve their RSG services focused on transition from profit-motivated to a harm minimisation approach. The IM was satisfied that most RSG recommendations and enhancements were addressed as part of relevant remediation projects.

Operationally, Crown Perth has achieved these targets by rebranding their RSG activities through their 'Crown PlaySafe' program, which was designed to prioritise harm minimisation and intended to be adequately resourced, funded and implemented. The Commission observes that Crown PlaySafe prioritises patron welfare and is adequately resourced, though reporting could be more comprehensive.

While the effectiveness of Crown PlaySafe initiatives can only be monitored over time, PlaySafe's overall architecture is satisfactory and encouraging. The Commission notes the implementation of measures by Crown Perth such as the enforcement of play periods under the PlaySafe strategy for EGMs and Table Games as positive RSG activities being undertaken.

Since the PCRC, the Commission prioritised the development of effective RSG measures at the Perth Casino to reduce the effects of gambling harm on the gaming floor. The Commission issued a suite of amendments to the Directions (discussed in the section below), to require Crown Perth to implement changes in line with PCRC Recommendations.

The combined efforts to tackle gambling harm and increase RSG at Perth Casino have resulted in an improved focus on the impacts of gambling harm on patrons, noting that the major impacts will not be evidenced until the Directions are fully implemented. The Commission is satisfied that Crown Perth now operates an environment that is maturing since the PCRC and places adequate priority on the intent to deliver harm minimisation and RSG.

4.2. Implementation of Directions taking effect after 1 July 2025

Significant measures, informed by the PCRC recommendations have been initiated through amendments to the Directions, and implementation is scheduled to occur by 1 December 2025 and 1 December 2026. Particularly, the EGM Scheme under Direction 26 and the financial capacity of IGF members under Direction 27 are major harm minimisation measures that Crown Perth are required to undertake, including by the relevant dates, as below.

Date	Direction	Effect
1 July 2023	26.1 Maximum Bet	Maximum bets for EGM on the Main Gaming Floor cannot exceed \$10.
1 Dec 2024	27.2 Conditions for Entry to and Remaining in the IGF	New IGF patrons to be certified by providing financial capacity to access IGF gaming rooms.
1 Jul 2025		Pre-existing IGF patrons to be certified by providing financial capacity to access IGF gaming rooms.
1 Dec 2025	26.2-4 Mandatory Carded Play	No EGM may be played without the use of a Player Card issued to the specific patron.
	26.5 Player Activity Statement	Active casino patrons to be furnished with Player Activity Statements monthly, at any time upon request, and at Virtual Information Kiosks (VIK).
	26.6 No Inducement to Play EGM	The casino operator will not be able to provide any type of inducements for patrons to play EGM.
	26.7 No benefit for referring to reward program	The casino operator must not provide anything of value to a person (other than an employee) for referral of another to a rewards program.
	26.8-9 Collection and Reporting Player Information	Casino must, to the extent practicable, collect and retain specified player activity information for provision to the Commission.
	26.10 Limits on periods of Play on Electronic Gaming Machines	The casino operator must use all reasonable endeavours to prevent patrons to play EGM once Player Week (28 hours), Player Day (12 hours), or Continuous Play (3 continuous hours mandate a 15-minute break in-between) times are reached.
1 Dec 2026	26.11 Casino Patron pre-commitment limits on Electronic Gaming Machines	The casino operator must prevent patrons to play EGM once Weekly Net Loss (\$300) amount is reached. Weekly Net Loss can be adjusted under specific requirements (requirements to be finalised).
	26.10 Limits on periods of Play on Electronic Gaming Machines	The casino operator must prevent patrons to play EGM once Player Week (28 hours), Player Day (12 hours), or Continuous Play (3 continuous hours mandate a 15-minute break in-between) times are reached.

The Commission reviewed evidence that Crown Perth is currently on track to implement the changes and meet the relevant timeframes. Evidence indicated planning and oversight showed a clear articulation of milestones, resource allocation, monitoring and reporting to ensure all departments within Crown were aware of and prepared for upcoming changes and deadlines.

Evaluation of the requirements in Direction 27 showed that the required processes were already in place at Crown, supported by 'robust' IT capabilities and security measures to monitor access.

The Commission is satisfied that Crown Perth is proactive in their planning toward the implementation of Directions 26 and 27, and believes that the upcoming measures will be rolled out within the required timeframes.

From a long-term perspective, Directions 26 and 27 present major opportunities in addressing some of the underlying root causes of gambling harm and criminal activities in a casino complex, which align with the Commission's strategic priorities. The Commission and the Chief Casino Officer, appointed under the *Casino Control Act 1984*, will continue monitoring the roll-out of these systems and provide ongoing assurance that implementation is timely and effective.

5. Legislative Requirements

The Commission finds that Crown Perth now correctly identifies and implements relevant regulatory requirements applicable to Perth Casino.

Crown's compliance team has shown satisfactory understanding of AML/CTF and gaming obligations.

After the IM finished his oversight, the Commission sought assurance that Crown Perth continued to operate in compliance with relevant regulatory requirements, including retention of comprehensive records for inspection by the regulator.

5.1. Gaming obligations

The Commission reviewed Crown Perth's compliance to regulatory gaming obligations, focusing on trends since the start of the PCRC, and is satisfied that Crown Perth correctly identifies and implements relevant regulatory requirements.

Government inspectors at Perth Casino conduct audits, inspections and investigations into Crown Perth's compliance with relevant legislative provisions, and they are present on-site to attend to any issues arising.

In terms of record-keeping and sound management of gaming obligations, the Commission found that Crown Perth has identified and recorded the majority of its gaming obligations.

5.2. AML/CTF obligations

From a procedural standpoint, Crown Perth has identified all relevant legislative obligations as required by the AML/CTF Act and Rules, which it has then factored into its Joint AML/CTF Program.

Crown has adequate systems, controls and processes in place to ensure that it regularly monitors compliance of its AML/CTF obligations and that any potential breaches against legislation and Crown's Joint AML/CTF Program, are identified and escalated appropriately.

Upcoming changes to Australia's AML/CTF regulatory instruments will mean changes to the AML/CTF Act and Rules, which will therefore impact Crown's AML/CTF obligations. Crown have indicated that they have commenced discussions to assist with identifying and updating their AML/CTF obligations.

Finally, Crown should ensure that after updating its AML/CTF obligations, it undertakes current state assessments to identify any gaps in its existing systems, controls and processes that may need to be updated to address the new AML/CTF obligations.

6. Financial Crime

The PCRC had identified key deficiencies that resulted in Crown Perth being unable and unwilling to prevent financial crime.

During remediation, Crown Perth has established measures aimed at investigating suspicious transactions and patrons' financial sources above certain thresholds.

The PCRC highlighted that Crown Resorts had been ineffective in identifying, mitigating and managing money laundering and financial crime across its casinos. The PCRC Report also highlighted that Crown Perth's risk governance should be improved to encompass identification, management and remediation of risks relating to criminal infiltration and the Perth Casino's AML/CTF Program.

Since 2021, Crown has developed measures to meet legislative requirements set out in the *AML/CTF Act 2006* (Cth) and the *AML/CTF Rules Instrument 2007* (No. 1). Crown completed all relevant remediation deliverables by the end of 2023, which have been subsequently audited. The IM is satisfied that financial crime deliverables have been completed and have enhanced Crown's AML/CTF effectiveness.

Crown has maintained a suitably structured and resourced financial crime function. The structure of the financial crime team is largely unchanged, and staff turnover is in line with business-as-usual expectations. Evidence viewed by the Commission suggests Crown's current financial crime resourcing remains sufficient to adequately manage its financial crime operations and remediation efforts.

7. Culture, integrity and transformation & Organisational design and governance

The workplace culture of Crown Perth and its employees has improved across multiple facets. Perth Casino now has programs that promote ethical behaviours, robust training modules, and adequate internal oversight over these matters. Nevertheless, instilling long-lasting cultural change cannot be achieved in such a short term, and will need to be monitored post the suitability assessment.

7.1. Culture at Perth Casino

The PCRC final report concluded that Crown Perth's culture was 'poor' and in need of complete transformation. Crown Perth has since undergone a process of gradual transformation that addressed cultural deficiencies that the PCRC identified. The program promoted an overall uplift of the casino operator's communication and engagement programs, creating interdependencies with risk and compliance culture, and RSG.

Crown Perth has taken significant steps forward in embedding its cultural transformation across all levels of the organisation with adequate resources and support by culture change specialists. This resulted in Crown Perth becoming a 'psychologically safe' workplace with appropriate risk and compliance cultures.

The Commission understands employees are responding positively to transformations and Crown Perth's aspired cultural values and behaviours.

Crown Perth has also reinforced a culture of compliance with policy and procedure by taking ownership and enforcing consequences for misconduct in the workplace.

The Commission notes the robust structure now overseeing culture and integrity at Perth Casino, and is satisfied that Crown Perth is placing the right level of commitment and

resourcing to prioritise culture and the health and safety of their employees. Poor organisational culture is often symptomatic of an erosion in the trust that the employer is perceived to be doing 'the right thing' by the employees. For this reason, the encouraging findings on metrics of culture and integrity indicate that the Perth Casino licensee has fostered a working environment where employees feel safer to voice their opinions, and receive the type of support and guidance necessary both for professional and personal development.

Nevertheless, while the Commission recognises Crown Perth's efforts in embedding a culture of compliance and change within the organisation, the Commission notes that long-lasting and sustainable change can only take place over a period of years beyond the IM's two-and-a-half-year term.

The Commission concurs with the analysis of the challenges associated with instilling long-lasting cultural change that is in the NICC's Inquiry into the Star Casino (Bell Inquiry). The Bell Inquiry reflected on the presence of a formal and an informal culture within every organisation, which impact behaviours by employees. An organisation's policies and systems create formal culture, while how employees act and respond to those policies, the mindset in which employees make decisions, form the informal culture.

The result of Star's informal culture was a clear antagonism toward the regulator, and an 'us v them' narrative.

While the Bell Inquiry applies to a different casino operator and in a different jurisdiction, the Commission finds their analysis on cultural risks to be of value in informing the relationship of the Commission with the Perth Casino licensee. It is clear that the best approach for Crown's directors, executives and senior leaders is to recognise their responsibilities to transform Crown Perth and build a positive working relationship with the regulator to achieve best practice.

The Commission is satisfied that, during the IM's term, a formal culture was established at Crown Perth with an appropriate set of policies and frameworks. However, the permeation of that formal culture into the conduct of Crown's personnel is an ongoing, lengthy process that will take time and monitoring by the regulator.

When discussing the relationship between the regulator and Crown Perth, the PCRC consistently referred to interactions between DLGSC and Crown Perth, with failings on both sides. It seemed apparent that the Commission did not have an established communication channel with Crown Perth, often delegating to DLGSC and not being proactive in enforcing its regulatory posture, which resulted in Crown Perth not communicating to the Commission openly. This minimal relationship with the Commission exacerbated criminal proliferation at Crown Perth, through lack of effective monitoring controls and 'inattention', and did not satisfactorily address the root causes of gambling harm at Perth Casino.

Since the PCRC, and following new management at Crown Perth, changes have been made across the board to establish more appropriate and formal working relationships, including a more prominent role for the Commission in driving future work concerning harm minimisation measures. Crown Perth and the Commission now have formal and informal communication channels, and Crown has shown willingness to accommodate the regulator's requests for information. Periodic meetings and communication between

the Chairs of Crown Perth and the Commission, and regular meetings between Crown Perth's CEO and the Commission's Chair are now taking place.

Crown Perth demonstrate awareness of their obligations to comply with the Commission and have on a number of occasions demonstrated examples of voluntary compliance.

The suitability assessment process, by virtue of the oversight functions performed, has assisted to drive the transparency. The true test of Crown Perth's willingness to collaborate with the Commission will be after the suitability assessment, when most of the more invasive oversight mechanisms will have ceased. The Commission will remain vigilant and perform its legislative function in regulating Crown Perth in the way recommended by the PCRC.

In 2025, the Commission updated its Compliance and Enforcement Policy to provide the gaming and wagering industry guidance on its regulatory approach. The policy establishes the Commission's regulatory posture and states that the Commission will:

- engage with industry, and the community of Western Australia to ensure regulatory settings are fit for purpose and meet legislative requirements and state government expectations;
- ensure there is ongoing, clear and consistent communication of its approach to regulation; providing transparency of processes, expectations, and compliance responses;
- work with regulated individuals and organisations to assist them to comply; in turn supporting the Commission's aim for voluntary compliance; and
- take a risk-based approach to compliance, increasing or decreasing intervention in response to the conduct of regulated entities and recognising that some non-compliance may be inadvertent, particularly by smaller organisations and individuals.

The Commission strictly follows these policies in its engagement with Crown Perth and Crown Perth understand their responsibilities and obligations through this process. The Commission and Crown Perth are operating with a professional and often cooperative approach with both parties responding in a manner that is both timely and respectful. Although the communication with Crown Perth is open and provides opportunity for Crown Perth to provide their position on matters, the authority of the Commission is respected.

7.2. Management and operations of the Burswood Casino

While Burswood Nominees Limited is the Perth Casino licensee, the PCRC identified that its parent company, Crown Resorts', centralised approach to management and governance carried a significantly higher risk toward lack of accountability by management, blurring of reporting lines, falling through gaps and absence of specific and independent focus on financial and non-financial risks at the local level.

Since the PCRC Report, Crown Resorts moved its operating model toward a more property-centric, decentralised model, which resulted in higher responsibility and accountability for local management to deliver core transformation and remediation functions. The roles, responsibilities, function and authority in the corporate structure of

Crown, from the group to the local level, have been defined and clarified, with a commitment to reviewing committee and senior management structures annually.

The Commission notes the shift from a centralised to localised approach is a positive and crucial development as part of the long-term embedment of remediation-induced actions and controls. As the regulatory tapestry differs across jurisdictions, a property-centric focus allows the Perth Casino licensee to be more aware of and adequately capture their obligations under WA legislation, as well as be more responsive and collaborative with the Commission. It is the Commission's opinion that Crown ought to maintain this approach, and that the Commission should encourage such a model.

Crown Resorts and Crown Perth have undergone a significant process of refreshing key figures in their leadership team. Crown Perth appointed a new CEO in 2022, and again in 2025, which was followed by the revision and appointment of new key personnel, with clear roles and responsibilities.

The revised composition of Crown Perth's Board has led to increasingly independent judgment, also underpinned by the more decentralised governance model, resulting in a more accountable, responsible and effective management of Crown Perth.

Crown Perth's leadership training programs for senior leaders, middle managers, supervisors and team leaders have contributed to uplifting Crown Perth's organisational change in culture and behaviours, which was reflected by the conduct of its employees.

The IM positively noted the implementation of a property-specific communication and engagement strategy which focused on the roles of leaders in communicating culture change. These improvements blended well with Dr Lagan's analysis in the Bell Inquiry, which highlighted that middle managers were the main levers of culture and key to setting or resetting an organisation's culture. Crown Perth's cultural uplift at all levels of management is thus an encouraging sign of long-term sustainability of the changes implemented during the remediation period.

The Commission has reviewed the IM's findings and considers that management and governance of the Perth Casino has significantly improved; addressing the key deficiencies identified by the PCRC.

8. Risk

Since the PCRC, Crown Perth has developed a solid risk management framework, and recruited competent personnel to manage it.

The Commission will monitor Crown Perth's implementation of current and future risk-mitigation measures.

Crown Perth's risk management strategies have undergone a significant consolidation since the PCRC identified that former Crown Resorts risk policies were silent on the role and responsibilities of property and local boards on risk management, risk appetite or definition of major or material risks to casino operators.

The IM provided assurance that Crown Perth's Risk Transformation Journey had progressed adequately, set appropriate targets and methodology, and enhanced its risk management capabilities (risk management systems, policies, strategy and processes) to meet international standards.

Crown Perth now has measures to monitor whether various business units operated within the risk appetite framework of the Board.

Appropriate escalation procedures had been put in place to refer to the Board any relevant matters and for the regulator to be notified, showing willingness to maintain an open and constructive relationship with the Commission and the DLGSC.

9. Conclusion

For the reasons contained in this report, and insofar as Crown Perth maintains their current operating standards, the Commission recommends to the Minister:

- (a) Crown Perth is a suitable entity to hold a gaming licence under the *Casino Control Act 1984*; and
- (b) No powers under section 21B of the *Casino Control Act 1984* ought to be exercised in respect to the Perth Casino licensee.

The IM's overall view on Crown Perth is that the organisation has made substantial progress in implementing its remediation plan, establishing the foundations for a culture of accountability and focus on managing risks and complying with its obligations. The Commission shares this view.

Nonetheless, the pathway to sustainable cultural change reinforcing desired behaviours is one that arguably takes longer than the two and a half years of IM monitorship.

Although the Commission finds Crown Perth suitable to hold a gaming licence in WA, the true test of integrity, however, begins now for the Perth Casino licensee.

At the end of the remediation period, the office of the IM has been discharged of their duties, and the Commission will now fulfil the long-term oversight of Crown Perth.

The PCRC suggested that the Commission's duties are to be exercised by reference to the interests of the community. The *Gaming and Wagering Commission Act 1987* empowers the Commission to administer gaming and wagering legislation, and safeguard gambling activities, including gaming at Perth Casino, to ensure they are conducted consistently within the interests of the community.

In respect to Perth Casino, the Commission's responsibilities can be ascribed to two key objectives:

- a)** ensuring the socially responsible, lawful and efficient operation of the Perth Casino and casino gaming at Perth Casino; and
- b)** maintaining the confidence and trust of the public of Western Australia in the credibility, integrity and stability of gaming operations at Perth Casino.

The PCRC highlighted systemic limitations in how the Commission as the regulator monitored and influenced change at Perth Casino, providing a suite of recommendations to bolster the Commission's independence and design a clearer and bespoke relationship with DLGSC. It is thus evident that the Commission must be in the best position to oversee Crown Perth moving forward, and prevent any regression by Crown Perth to behaviours, management and operations preceding the PCRC.

In the past 12 months the Commission has taken significant steps to increase regulatory posture, and will continue to further build capability and capacity to perform its regulatory function in partnership with DLGSC.²


This report sets the basis for future work to be undertaken to monitor Crown Perth's ongoing reform and embedment of their remediation projects. The Commission now should seize the positive momentum and ensure that the effective oversight conducted by the IM in the remediation period is continued by the Commission going forward, as part of the Commission's duties and objectives, and provide assurance to State Government that Perth Casino maintains its remediation and transformation path.

The Commission's 2024-2026 Strategic Plan includes a focus on developing an assurance plan to monitor the continuation of remediated activities by the Perth Casino licensee to ensure ongoing resourcing, adherence and embedment. In line with the Commission's vision, monitoring will begin with an in-house casino monitoring function.

Below is a summary of the key areas that will inform the Commission's future work and development of an assurance plan:

- a)** Monitor Crown's progress to review and update its AML/CTF obligations as a result of the upcoming reforms.
- b)** The PCRC recommended the Commission play a more active role in monitoring Crown Perth's compliance with AML/CTF regulatory requirements. The Commonwealth has jurisdiction and prerogatives over enforcement of AML/CTF matters, and the Commission notes that future work after the suitability assessment must map out how to navigate this space complementarily with the Australian Transaction Reports and Analysis Centre (AUSTRAC) by providing an additional layer of scrutiny and vigilance without eroding the responsibilities of AUSTRAC.
- c)** Monitor Crown's ongoing resourcing of services and areas established or enhanced during the remediation period.

² From 1 July 2025, Department of Local Government, Industry Regulation and Safety following the Public Sector Reform.

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- d)** Monitor the implementation of RSG measures scheduled to commence post the suitability assessment with a specific focus on Directions served since the PCRC.
 - e)** Monitor Crown Perth's current and future risk-mitigation measures.
 - f)** Monitor the long-term embedment of cultural change.

Crown Perth bears a long-term responsibility to minimise gambling harm and prevent criminal proliferation, while the Commission is responsible for monitoring and regulating Crown Perth to achieve those objectives. The IM has laid the foundations for the restoration of public confidence in the Perth Casino licensee, and the present suitability should not be seen as a 'one-off' exercise, but as a continuous effort even after this report.