THE VILLE RESORT – CASINO



HARM MINIMISATION STRATEGY

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1. Introduction

1.1 Introduction

The Ville Resort-Casino ("The Ville") operates a Casino located in Townsville Qld encompassing a wide range of facilities and services for the local community and wider demographics which incorporates food, beverage gaming and accommodation facilities. The entertainment facilities including gaming are enjoyed by the vast majority however The Ville recognises that some of our customers will at some time experience difficulties in their association to gaming which may cause them personal and financial difficulties and potentially impact family, friends and the wider community.

While the decision to utilise the gambling facilities lies with the individual, The Ville recognises that customers need to be informed about the gambling harm that may be associated and the tools and support services that are available should they need to seek assistance with gaming behaviours.

Our commitment to providing gaming services for our customers in a responsible manner, with a focus on Harm Minimisation is paramount to the success of the operations. The Ville have developed a Harm Minimisation Strategy in alignment with the local community, regulator and government expectations and more recently is aligned with the "Gambling Harm Minimisation Plan for Queensland 2021-25".

In addition to complying with all legislation The Ville has implemented a range of additional policy and initiatives to promote and manage the Harm Minimisation Strategy. The Ville is committed to continually evolving and improving the Harm Minimisation Strategy through the evolvement of technology and community expectations.

1.2 Availability of the Program

The Gambling Harm Minimisation Strategy is available to customers upon request and will be located on the website https://www.the-ville.com.au/.

Customers of The Ville will be notified about the strategy through direct communication means and internal signage.

1.3 Purpose of the Harm Minimisation Strategy

The purpose of the Harm Minimisation Strategy is to encompass the following:

- Manage potential harm associated with gambling by creating a safer gambling environment;
- educate and inform patrons and employees, about the potential harm associated with gambling;
- to reduce the prevalence and severity of harm associated with the misuse and abuse of gambling activities;
- to foster safe conduct in relation to gambling and in particular, to ensure that gambling is conducted responsibly, fairly and honestly, with regard to minimising the harm associated with gambling;
- to facilitate the balanced development and maintenance, in the public interest, of an economically viable and socially safer gambling industry recognising the positive and negative impacts of gambling on communities;
- to ensure that gambling is conducted honestly and free from interference, criminal influence and exploitation;



- ensure compliance with industry legislation, code of practice and best practice measures;
- to ensure, as far as practicable, that the conduct of gambling is consistent with the expectations and aspirations of the public and local community.

2. Harm Minimisation Strategy

2.1 Safer Gambling Information

Safer gambling messages are displayed in various places around the property and within the casino to raise awareness about safer gambling practices. This includes both customer-facing areas, such as the casino floor, and employee-only areas, such as the back of house. These messages, often in the form of tag lines or links to our Harm Minimisation Strategy, are also included in all gaming-related marketing material to reinforce the importance of safer gambling.

Gambling Helpline number is displayed on a banner on every gaming machine to provide patrons with the number should they require assistance. Additional messages are also included on iVISTA platforms (Player Information Display) to encourage patrons to "Take a Break" which are displayed after there is continual play for 20 minutes on that gaming machine.

Safer Gambling and Exclusion information brochures, which are readily available are also included in material for all new memberships.

Safer Gambling signage and brochures are displayed in public toilet facilities, in close proximity to ATMs and cashier desks.

2.2 Cash Payout Limits

All cash will be paid in accordance with the applicable legislation requirements as set out by the regulations and policies.

Payments in excess of the cash payout limits will be paid by cheque, direct deposit to the member's nominated bank account or deposited to the member's Vantage Rewards account. Cash payout limits are set at the discretion of The Ville. These limits can be viewed on our Cash Payout Limits Policy available at the Cashiers.

For EGM Jackpot payouts, the balance of any amount over the limits set must be paid by cheque.

The Ville will not cash cheque payments until the next trading day.

2.3 Customer Loyalty Programs

The Ville operates a complex-wide Loyalty Program referred to as "Vantage Rewards" that entitles members to certain benefits and privileges.

Customers are able to obtain information from our staff on how to join the Vantage Rewards program, benefits of the program and player support mechanisms via:

- at Casino Promotions Desk;
- · at Cashier Desks; or
- Visit our website to review the benefits of the Vantage Rewards program.



When joining the Vantage Rewards Program, members are supplied with information about the Rewards Program, how to use features of the card, exclusion assistance and provided information about the opportunity to utilise the pre-commitment system.

The loyalty program encompasses a wide range of benefits for all patrons using the facilities of the venue that includes restaurants, beverages, accommodation and gaming services.

Player activity statements are made available to members upon request which will include at a minimum, all wins and losses for the period of the statement.

2.4 Exclusion Provisions

The Ville provides the option for players to exclude (ban) themselves from our casino facility. We aim to do this by providing an environment that ensures the matter is dealt with sensitively, confidentially and in a timely manner. Exclusion options are available for individuals who may be experiencing difficulties with their gambling behaviour: The Ville Casino have a Memorandum of Understanding with Centacare North Queensland to facilitate remote exclusions easing the need for patrons to attend the venue in person to process an exclusion.

What happens once my exclusion order is processed?

Exclusions will take effect immediately and remain in force for a period of five years. A request to revoke your exclusion may only be submitted within 24 hours (cooling off period) or after a minimum period of one year has passed from the commencement of your exclusion. Further information is available from the Harm Minimisation Officer, Compliance Manager, Security Team, or Gaming Supervisors (CLO).

Excluded persons are prohibited from entering or remaining in the casino at The Ville, including participating in Keno gaming and approved wagering.

Consequences of breaching an exclusion include prosecution in a court and potential penalties including fines. Once a person is excluded, any membership of the Vantage Rewards program is suspended with associated benefits no longer available to the excluded person and the person is removed from all mailing lists used for marketing purposes by the casino.

2.5 Prohibition on Gambling by Minors

It is an offence by law for any person under the age of eighteen (18) years to participate in gambling activities. The Ville prohibits persons less than 18 years of age from entering and remaining in any gambling area. The Ville also prohibits persons from leaving their children unattended in any area. Persons found doing so may be excluded from the casino and reported to the appropriate Government Authority.

2.6 Pre-Commitment

The Ville provides customers with the ability to set limits based on time on device and expenditure levels with respect to turnover or player loss. The pre-commitment technology is advertised to players upon registration of membership and through the iVISTA units installed on each gaming machine.

Players are able to register for pre-commitment through the following means:

members service/cashier's desk



Notifications and alert messages are displayed on the iVISTA units during game play based on the limits set by the members, the messages include the following:

- Approaching limit notification
- Limit reached

When setting limits through the pre-commitment system the customer may choose any of the following options:

- total amount the player can lose in a day, week or month;
- total amount the player can bet in a day, week or month;
- the number of gaming days the player is allowed to play continuously;
- the time duration a player can spend playing at a gaming machine on a single day, week or month.

If a player reaches the limits set, their membership card will temporarily disable for their applicable time frame. The patron may continue play, however will be restricted from accumulating and redeeming any further benefits of their membership.

Any ease in pre-commitment restrictions will incur a 24 hour activation period. Further constriction of limits will be activated at the time of the request.

2.7 Gambling Environment

2.7.1 Breaks in play

Customers are encouraged to take regular breaks when utilising the gambling facilities which The Ville assists through:

- requiring patrons to leave gaming machines to participate in most promotional draws to claim prizes;
- announcements to take refreshment breaks;
- reminders through iVISTA units;
- café and lounge facilities located throughout the casino facilities;
- ability of patrons to lock gaming machine with member card ensuring security of funds and reserving the machine while they take a break.

2.7.2 Clocks

Clocks are located on each gaming machine so customers can be aware of the passing of time.

2.7.3 ATMs

ATMs are not located within the designated gaming areas and are positioned in consultation with and approval by relevant legislation.

2.8 Advertising and Promotions

The Ville adheres to the Queensland Responsible Gambling Advertising and Promotions guideline. This guideline covers gambling related communication activities including advertising in the media, sponsorship, point of sale material, leaflets, displays, internal and external signage, the internet, subscriber products and other materials designed for public communication.

The guideline is used in conjunction with all regulatory requirements for the conduct of gambling in Queensland.

The Ville will ensure at all times that any advertising or promotion for gambling:



- complies with Queensland Responsible Gambling Advertising and Promotions guidelines;
- is not false, misleading or deceptive;
- does not implicitly or explicitly misrepresent the probability of winning a prize;
- does not give the impression that gambling is a reasonable strategy for financial betterment;
- does not include misleading statements about odds, prizes or chances of winning;
- does not offend prevailing community standards;
- is not implicitly or explicitly directed at sales to minors or vulnerable or disadvantaged groups;
- does not involve any irresponsible trading practices;
- does not depict or promote the consumption of alcohol while engaged in the activity of fund-raising;
- has the consent of the person before publishing or causing to be published anything that identifies a person who has won a prize; and
- where appropriate, positive safer gambling messages are incorporated in advertising and promotions.

Each prospective advertisement and promotion is checked by relevant staff against Codes and standards, and also checked against relevant legal requirements, including compliance with the Australian Consumer Law.

Further to the above The Ville is committed to the dissemination and communication of Safer Gambling messages via the following means:

- Advertising messages through iVista units and EGM screens (scrolling messages)
- Flyers, pamphlets and posters
- Safer Gambling messages on all external gaming advertisements and promotions
- In-house electronic systems

2.9 Service of Alcohol to Gaming Machines and Tables

The Ville aims to provide a safe venue and responsible service of alcohol to our patrons by implementing and performing harm minimisation practices to reduce the potential risk of alcohol abuse and misuse.

Patrons are permitted to order drinks at Electronic Gaming Machines and Table Games. Staff will monitor the consumption of alcohol in line with RSA policy and procedures. Non-alcoholic beverages, including water, tea and coffee, are available to customers on a complimentary basis whilst engaging in gambling activities. Any patron participating in gambling activity showing signs of unduly intoxication or disorderly behaviour will be required to cease gambling activity and will be required to leave the premise immediately or for in-house guests, return to their room.

Our casino advocates the responsible service of alcohol with staff. Training regarding individual and company responsibilities, in relation to gambling and the service of alcohol, is provided to relevant staff members.

Additional responsible service of alcohol strategies and policies are outlined in The Ville Resort - Casino Risk Assessed Management Plan (RAMP). You may ask a friendly staff member to view our RAMP, also available in all of our F&B outlets.

2.10 Training and Skills Development

The Ville have developed and continue to develop safer gaming training programs and refresher training courses to assist relevant staff in the delivery of safer gambling. There are a range of training programs in place that include internal and external providers. The aim of the training programs is to:

- ensure the staff members understand the commitments and provisions of the Harm Minimisation Strategy;
- equip staff to deliver gambling products and ancillary services in accordance with the Harm Minimisation Strategy;
- increase the awareness and understanding of possible behavioural indicators of gambling harm;
- ensure staff understand the support and counselling services available to customers;
- ensure staff are suitably skilled to be aware of when a customer is displaying behaviours potentially consistent with gambling harm, or displaying observable signs of distress and understand what actions should be taken;
- ensure staff have the ability and skills to respond appropriately to customer requests and or situations in which require further action;
- ensure staff are provided with the tools and systems to maintain communication and records of each instance.

The Ville will review and assess the Safer Gambling training program annually to ensure it remains effective in supporting the Harm Minimisation Strategy document and community expectations.

Further to the aforementioned, it is acknowledged through the Queensland Gambling Harm Minimisation Plan the increase in high-risk demographics and community groups. The Ville has a role to play in increasing the awareness of potential risks through gambling products. In addressing these concerns, The Ville will be embarking on strategies to reduce the potential risks through community engagement and awareness programs in conjunction with government agencies and health care providers such as Centacare North Queensland.

Figure 2.1 – Training and	Skills Prog	ram		
	2022	2023	2024	2025
Review current training processes				
Evaluate effectiveness				
Research and update training and skills development program				
Refine training and skills development program using research phase				
Implement and adopt new skills and development training program				
Review changes to the training program for effectiveness				

Source: The Ville



2.11 Customer Liaison Officer

The Ville recognises that there are limitations on the knowledge and ability for each staff member to interact with customers at a high level. Identifying and addressing certain situations requires a high level of understanding, empathy and experience.

The Ville have trained Customer Liaison Officers (Gaming Supervisors) that at least one of which is available in the gaming area at all times of the gaming operations. The role of the CLO includes the following:

- monitor the gaming areas for patron behaviours
- ensure that staff record/report safer gambling incidents and interventions which are escalated for management review
- observe customers who display behaviour that is consistent with gambling harm and provide assistance/information as necessary
- provide advice to staff about gambling harm and how to respond to signs of gambling harm, and
- respond to customer enquiries and complaints relating to gambling products and services.

2.12 Interaction with Customers

If an employee believes that a person in the casino is acting in an unacceptable manner, or is visibly affected by alcohol, the casino will take appropriate action which may include removal from the casino complex.

Where a person in the casino is exhibiting or displaying signs of distress, or behaviours potentially indicating a problem with their gambling, The Ville will implement procedures designed to provide an appropriate response to the needs of the guest.

Such signs of distress, behaviour or situations may include:

- gambling every day of the week;
- person gambles continuously without taking a break for extended periods of time;
- gets cash out from an ATM at the venue on multiple occasions;
- trying to borrow, 'scam' money or sell valuables to others for gambling;
- puts large win amounts back into the machine and keeps playing;
- displaying anger, kicking machines, looking sad and/or crying:
- friend or relatives call or arrive to ask if the person is still at the casino:
- blames the casino, the staff or gaming machines because they lost;
- having an unrealistic perception about the chance/odds of winning;
- they are suffering from depression and/or have thoughts of suicide due to gambling behaviour;
- a changed attitude towards their gambling;
- trying obsessively to win on a particular machine; or
- spending too much time and/or money gambling.

We understand that employees should not make assessments as to whether an individual is, or is not able to control their gambling behaviour. Rather we require that the employee be aware of and respond to such indicators of distress, behaviour or requests sensitively and within an appropriate timeframe. We also require that action taken in such circumstances be reported to management for further monitoring and documentation.

In circumstances where it may be clear that a patron is displaying ongoing harm indicators, the Harm Minimisation Officer will be engaged to make an assessment and carry out any necessary actions if applicable.

2.13 Interaction with Gambling Support Services

As a major stakeholder in Townsville, The Ville is an active member of and participates in industry peak bodies and consultative groups to enable it to maintain awareness of harm minimisation issues.

The Ville have developed a strong relationship with Centacare North Queensland to assist in the development of the Harm Minimisation Strategy incorporating a strategy to shift from "Responsible Gambling" to "Safer Gambling". The Ville and Centacare have established a "Memorandum of Understanding" which outlines the practices and relationship between the two parties on dealing with Harm Minimisation issues. This relationship aims to:

- Recognises that there are safe levels of gambling consumption;
- Reinforces both the safe provision and consumption of gambling; and
- Aims to reduce the harms associated with gambling, irrespective of where this harm occurs on the gambling spectrum.

The Ville and Centacare NQ meet on a regular basis to discuss Harm Minimisation practices and Centacare provides training support and advice for staff members involved in the service and monitoring of the gambling products and services.

Details of all meetings with safer gambling support services are maintained.

2.14 Customer Feedback

The Ville has procedures in place to ensure that gambling-related feedback and complaints are dealt with promptly. Where the complainant is not satisfied the venue will inform the complainant of other avenues of redress, in particular the Queensland Office of Gaming Regulation.

2.15 Loan Sharking

The Ville Resort-Casino does not condone money lending between patrons for financial gain or loan sharking, as it is an unethical practice that can potentially harm vulnerable patrons and is not consistent with the principles of safer gambling practices. The casino is committed to maintaining a safer gambling environment for its patrons and is against any activities that could compromise this objective.

2.16 Emerging Technology and New Products

The increasing sophistication of gambling products and systems through electronic technologies has increased accessibility to gambling products and has posed many questions and challenges from a safer gambling perspective.

Providing individuals and venues with tools that facilitate awareness and control mechanisms is one measure that is continuously being investigated to assist in reducing harm. A number of studies and trials are being investigated to provide evidence-based solutions.

The Ville is committed to the adoption of technological solutions through collaborative and systemic approaches to the minimisation of gambling related harm being addressed by the Gambling Harm Minimisation Plan for Queensland 2021-25.

The Ville acknowledges the role it has to play in the development of harm minimisation tools and is acutely aware of the need to implement technologies that are effective in reducing harm. There are many options available to Casino operators that all have varied levels of success and history has shown the ineffectiveness of a one size fits all approach.



Although it is inherently difficult to commit to a timeframe based on technology systems The Ville have developed an action plan and timeline to address the implementation of technology and systems addressing the key areas to include digitalisation and eCommerce gambling.

2.16.1 Digitalisation and eCommerce

The evolvement of digital payments over recent years have presented many businesses with opportunities to reduce the reliance of cash transactions, instead moving towards a digital environment.

The gambling industry is currently undertaking trials of the digital payments pertaining to gambling activities and The Ville is working with industry peak bodies to examine the effectiveness of the changes.

There are several factors that must be considered through the implementation process and varying systems will require additional frameworks to incorporate. The Ville is also working with the current gaming providers to ascertain the ability of the current systems to incorporate the changes, this will be conducted along the timeframe as outlined below.

Figure 2.2 – Digitalisation and	eCommerc	e Project		
	2022	2023	2024	2025
Define system requirements and key features				
Investigate current system capabilities				
Investigate alternate systems solutions				
Recommend system				
Undertake trial				
Evaluate effectiveness				
Implement system if deemed appropriate and effective				

Source: The Ville

• The above is an indicative guideline only and relies on 3rd party assistance and industry inclusion.

2.16.2 Facial Recognition

Facial recognition software has been used infrequently in hospitality venues however recent technological changes have allowed further study and implementation of the technology to be used for harm minimisation strategies.

The Ville has recently adopted the use of Facial Recognition software in its harm minimisation efforts. The technology has been implemented in stages to ensure its effectiveness and system capability meet the required standards. The Ville has started investigating the current capabilities of the technology and determining additional requirements to enhance its integration into the Harm Minimisation Strategy.

The following outlines the program inception.

Figure 2.3 – Facial Re	ecognition			
	2022	2023	2024	2025
Define system requirements and key features				
Investigate current system capabilities				
Investigate alternate systems solutions				
Recommend system				
Undertake trial				
Evaluate effectiveness				
Implement system if deemed appropriate and effective				

Source: The Ville Casino

2.17 Evidence Based Research and Trials

As technology and community expectations evolve The Ville are committed to working in collaboration with regulators and the community to undertake research and implement continuous improvement methods to address harm minimisation issues.

When considering changes to practices, policies and technology systems, The Ville will rely on evidence based outcomes and research to implement change and or modification to existing policies and practices.

2.18 Review of the Harm Minimisation Strategy

The Harm Minimisation Strategy will be reviewed internally at least annually to ensure compliance with relevant legislation and any changes to relevant codes of practice and guidelines.

The Ville will also engage with third party associates and industry associations to assist in implementing continuous improvements based on the effectiveness of current policies and procedures.

3. Gambling Harm Minimisation 2021-2025

The Queensland government introduced in late 2021 the Harm Minimisation Plan with an emphasis on industry social responsibility and the adoption of technological, collaborative and systemic approaches to the minimisation of gambling related harm.

The strategy document includes four pillars referred to in the document as:

- · Leadership and Culture
- Technology and Environment
- Public Health Approach
- Regulatory Framework

Each pillar defines the expectations through goals, strategies and key deliverables. The Ville is committed to working with government and regulators toward the common goal over the next 5 years.

Many of the strategies have been outlined in The Ville Harm Minimisation Strategy with some measures requiring a longer process of investigation, trial and implementation.

3.1 Leadership and Culture

The following table identifies the strategic pillar goals, strategies and key deliverables contained in the Queensland Government Harm Minimisation Plan and provides assessment of The Ville's aligned strategies to meet the expectations.

Fig	ure 3.1 – Leadership and Cultur	e	
Goals			
Socially responsible industry	Industry, community and government working together to drive cultural change	Gambling harm prevention integrated into all aspects of operators' business	
Strategies			
Creating a strong mandate, identifying and encouraging leadership and grass roots level engagement	Informing and building capability of boards and governance structures to better understand and address gambling-related harm	Taking a harm prevention and precautionary approach to product and environment	
Ensuring all consumers can make informed choices			
Key Deliverables	Area within Harm Minimisatio	n document	
Industry developed customer care framework	 Section 2.4 Exclusion Provisions Section 2.6 Pre-Commitment Section 2.9 Service of Alcohol to Gaming Machines and Tables Section 3.0 Training and Skills Development Section 2.12 Interaction with Customers Role of the RGAC which will be supported by The Ville Casino and disseminated through awareness programs Memorandum of Understanding with Centacare 		
Responsible Gambling Advisory Committee (RGAC) engages industry, community and people with lived experience			
Information, tools and services tailored for general, at-risk and high-risk populations	Services	sions nt n Problem Gambling Support	
Elevate and connect responsible gambling networks across the state into harm minimisation policy and program development	 Section 2.13 Interaction with Services 	Section 2.13 Interaction with Problem Gambling Support	

3.2 Technology and Environment

Figure	3.2 – Technology and Environn	nent
Goals		
Gambling products and environments are safer and an evidence-based approach is taken to development	Gambling products and practices keep pace with community expectations	Innovation is applied to consumer protection as much as it is product development
Strategies		
Understanding emerging technologies, their market impact and the potential for harm	Knowledge sharing	All parts of the supply chain 'design in' protections to protect and empower consumers
Transition to safe cashless environments	Understand and respond to online emerging markets	
Key Deliverables	Area within Harm Minimisatio	n document
	Section 2.16 Evidence Base	d Decearsh and Trials
Facilitate the sharing and dissemination of research to inform the implementation of evidence-based technology and environmental interventions	Section 2.16 Evidence Base	u Research and Thais
dissemination of research to inform the implementation of evidence-based technology and	Section 2.16 Evidence Base Section 2.15 Emerging Tech Section 2.16 Evidence Base	nology and New Products
dissemination of research to inform the implementation of evidence-based technology and environmental interventions Increase use of pilots and place-	Section 2.15 Emerging Tech	nology and New Products d Research and Trials

3.3 Public Health Approach

3.3 Public Health Approac		
Figu	ure 3.3 – Public Health Approac	h
Goals		
Integrated whole-of-system approach that moves away from a focus on individual pathology	Gambling harm is addressed along all levels of the risk continuum	A focus on prevention and awareness raising as well as help and support
Strategies		
Better understanding gambling harm to inform policy interventions	Improving cross-sectoral linkages and approaches	Interventions addressing specific needs of 'at risk' communities
Collaborative, coordinated approaches to prevention and awareness raising initiatives	Implementing best practice gambling help and self-help support models	
Key Deliverables	Area within Harm Minimisatio	n document
Population level research of gambling related harm and risk prevalence	 This will be conducted in alignment with peak bodies and industry regulators Section 2.8 Advertising and Promotions 	
Deliver consistent and targeted gambling harm awareness campaigns and messaging		
Co-designed initiatives with government and sectors responsible for areas such as mental health, alcohol and drug use and financial resilience outcomes	Section 2.13 Interaction with Gambling Support Services	
Revised Queensland Gambling Help model that is client focused and tailored to meet the specific needs of individuals and communities	 Section 3.0 Training and Ski Section 2.11 Customer Liais Section 2.12 Interaction with Section 2.13 Interaction with 	on Officer Customers

3.4 Regulatory Framework

5.4 Regulatory Framewor		
Fiç	ure 3.4 – Regulatory Framewor	k
Goals		
Fit-for-purpose, proportionate and risk-based	Evidence-led and outcomes focused	Transparent and accountable
Queensland actively participating and leading in the national regulatory space		
Strategies		
Strengthening harm minimisation controls	Taking a local and national approach to regulation	Engaging stakeholders in the design, implementation and evaluation of programs and interventions
Building a more complete data picture and evidence base to inform decisions	Increased transparency in decision making and policy development	
the state of the s		
Key Deliverables	Area within Harm Minimisation	n document
Key Deliverables Review Code of Practice and mandatory requirements to strengthen and encourage effective harm minimisation outcomes	Section 2.16 Evidence Base	
Review Code of Practice and mandatory requirements to strengthen and encourage effective harm minimisation	Section 2.16 Evidence Base	ed Research and Trials Harm Minimisation Strategy
Review Code of Practice and mandatory requirements to strengthen and encourage effective harm minimisation outcomes Combine government/industry information sets to assess	 Section 2.16 Evidence Base Section 2.17 Review of the 	ed Research and Trials Harm Minimisation Strategy
Review Code of Practice and mandatory requirements to strengthen and encourage effective harm minimisation outcomes Combine government/industry information sets to assess impact on community wellbeing Develop Commissioner guidelines targeting significant	 Section 2.16 Evidence Base Section 2.17 Review of the Section 2.16 Evidence Base 	ed Research and Trials Harm Minimisation Strategy