



Tasmanian Liquor and Gambling Commission

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## **Coms Systems Limited – Submission on Harm Minimisation Technologies**

### Background

Coms Systems Limited (“Coms”) provides gaming venue management systems and support to class 4 (club and pub) societies and venues in New Zealand.

Coms also provides *The Guardian* facial recognition solution to NZ class 4 venues to assist with the detection of excluded persons and also to gaming venues in South Australia.

### Summary

Class 4 gaming machine harm can be reduced by encouraging and mandating better record keeping, by having better monitoring of players, and via the greater use of harm minimisation technology.

Coms is supportive of the following:

- The use of facial recognition to assist with monitoring and detection of excluded/barred persons (this should be made mandatory for all high turnover venues and all medium turnover venues located in high-deprivation areas).
- Having an electronic display located in a discreet location within the venue that displays photos of persons who have been excluded from the venue (this should be made mandatory for all venues).

### Facial Recognition - An Effective Multi Venue Exclusion System is the Cornerstone of Effective Treatment

There is value in investing in modern initiatives to address harm caused by persistent and relapsed moderate-to-high-risk gambling.

There is a large body of research that confirms the value of multi-venue exclusion and the need for facial recognition to monitor enforcement. This research confirms that exclusion is an extremely effective tool in treating problem gambling. A summary of the research is included in the attached schedule. The research acknowledges that:

- The exclusion must be multi-venue (regional) to prevent the excluded person moving to a nearby venue; and
- Technological aids are required to assist with effective monitoring and enforcement of exclusion orders, due to the limited ability of venue staff to accurately recall and monitor a large number of excluded persons.

We also know that the main barrier to reducing problem gambling rate further is the very high relapse rate. The widespread use of multi-venue exclusion, which is monitored and enforced, is the key to reducing the high relapse rate.

The technology already exists and is popular with societies and venues.



The Guardian is a market-leading system that identifies excluded persons as they enter a gaming room, by matching them against a centralised database of excluded persons (CONCERN in New Zealand and BOEN in South Australia).

The Guardian is an effective, powerful harm minimisation tool that significantly improves problem gambler detection by automating the exclusion process. There are currently 165 class 4 venues (pub and club venues) that have The Guardian facial recognition system installed (15.7% of the NZ pub and clubs with gaming) all of these systems have been installed voluntarily). All Skycity Casinos in New Zealand and Australia have The Guardian installed. 15 venues in South Australia also have The Guardian installed.

The Guardian video link 1: <https://vimeo.com/269989002>

The Guardian video link 2: <https://vimeo.com/528585756>

More information: <https://www.coms.net.nz/the-guardian-facial-recognition/>

The current systems are working extremely well. The systems regularly detect persons attempting to breach their exclusion order. After being detected once and turned away, we have noticed that it is extremely rare for the person to be subsequently detected. This indicates that the mere presence of the system acts as a considerable deterrent to further breaches.

To improve the quality of the multi-venue exclusion system, facial recognition detection systems should be mandatory for all high turnover venues and all medium turnover venues located in high-deprivation areas.

### Electronic Photo Boards of Excluded Persons

Coms currently offers a persons of interest tablet, which displays photos of excluded persons.



The tablet can be installed in the venue office, lunchroom, or other discreet location, where it can be set to automatically scroll through the photos of persons who are excluded from the venue. This provides a constant reminder to venue staff of the excluded players they should be watching out for, in their gaming areas.

The system is currently available and can be installed and operated at nominal cost. Such systems should therefore be mandatory for all venues.

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## Schedule – Research on the Effectiveness of Exclusion and the Need for Facial Recognition

### Exclusion is an Effective Treatment Tool

Exclusion is acknowledged in the research as an effective treatment tool. It is also noted, however, that the current exclusion system has significant limitations due to:

- The difficulty gambling venue staff have in identifying excluded persons; and
- The need for the exclusion system to cover a large number of venues in order to prevent the excluded person from gambling at an alternative nearby venue.

In 2007, Dr Philip Townshend undertook a study<sup>1</sup> on the effectiveness of self-exclusion as a treatment option. The study found that self-exclusion is an effective treatment tool. Dr Townshend's paper noted:

The findings suggest that self-exclusion is an effective treatment tool for the group of clients who have extreme difficulty controlling their gambling in other ways, and may be more effective in the public health gambling environment.

Dr Townshend's paper also reviewed some of the prior international studies. He agreed with these studies, which found that in order for self-exclusion to be effective, there needs to be effective monitoring and enforcement. Dr Townshend noted:

Using Lesieur and Blume's (1987) SOGS screening tool, Ladouceur et al. (2000) examined 227 casino self-excluded gamblers and reported that 95% were probable pathological gamblers with a SOGS measurement of 5 or more. They reported that for this very problematic group of gamblers, self-banning was an effective treatment strategy, with 30% of gamblers reporting total abstinence for the duration of their self-exclusion period. They also noted that only 10% of their sample had used professional helping services and yet achieved a higher result than was reported in a contrasting study by Stewart and Brown (1988) where 8% of clients were abstinent after one year of attending Gamblers Anonymous meetings.

These results led Ladouceur to conclude that self-exclusion was a useful tertiary treatment tool that could be enhanced by promotion and better enforcement by gambling venues, a conclusion supported by the Australian Productivity Commission (1999) who suggest that "overall self-exclusion is a useful adjunct to responsible gambling policies" (p.16.67).

Both the value of self-exclusion and the observation from gamblers and gambling venues that it could be enhanced by better enforcement was noted in a report prepared by the South Australia Centre for Economic Studies (2003). This suggests that problem gamblers who used self-exclusion found it to be a useful self-initiated treatment tool to "reduce the harmful effects that problem gambling can have on the individual and the community" (p.7). These authors also noted that self-exclusion

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<sup>1</sup> Townshend, P. (2007). Self-Exclusion in a Public Health Environment: An Effective Treatment Option in New Zealand. *International Journal of Mental Health and Addiction*. 5 (4): 390-395.

derives its effectiveness from the integrity (either actual or perceived) of enforcement.

In 2010, the Auckland University of Technology's Gambling and Addictions Research Centre prepared a report titled *Formative Investigation into the Effectiveness of Gambling Venue Exclusion Processes in New Zealand*<sup>2</sup> ("the AUT Report"). The AUT Report confirmed the value of exclusion as an intervention tool but again noted that several areas (particularly detection and enforcement methods) required improvement. The AUT Report stated:

Exclusion of patrons from gambling venues is potentially an effective early intervention for minimising harm from excessive gambling since it may contribute to the treatment and/or recovery of people with developing and established gambling problems.

(page 4)

...

Over and above the question areas already discussed, survey participants were asked how their gambling had changed since signing their exclusion contract. Several positive impacts were reported including gambling less in terms of time and expenditure, quitting gambling, and attending (or recently attending) a gambling treatment service. Other positive effects were that taking out exclusion contracts was associated with a sense of relief for some people and a first supporting step until they could access counselling. On the whole, survey participants viewed the process of excluding to be positive in terms of venue staff approach and behaviour. In particular, participants appreciated feeling supported and encouraged by venue staff once they had decided to exclude.

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Thus, overall there appear to be many positive and beneficial aspects to the current exclusion processes indicating that the fundamental concept is sound and the current processes in place have a good foundation. However, the study found several areas where improvement to the processes would be beneficial, with suggestions originating from key stakeholders as well as survey participants.

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The AUT Report confirmed the great difficulty in expecting hospitality staff to memorise a large number of photos of excluded persons and then subsequently identify and remove the excluded persons. The issues with detection were particularly apparent when the exclusion did not originate from the venue, but was initiated as part of a multi-venue exclusion. The report also observed that identification is particularly difficult in an ethnically diverse population.

The AUT study found that 30% of participants reported breaching their exclusion contract. It was found that most participants who had breached an exclusion contract had done so on multiple occasions, and this occurred more often among electronic gaming machine players

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<sup>2</sup><https://openrepository.aut.ac.nz/bitstream/handle/10292/2009/problem-gambling-formative-investigation-report-final.pdf?sequence=2&isAllowed=y>

than casino table game players. The AUT study is consistent with other studies such as the 2008 study by Dickson-Gillespie, Ruple, Rosenthal, and Fong<sup>3</sup>, which found that 36% of self-excluders admitted to having returned to the casino during the exclusion period.

The AUT study found that of the participants who breached an exclusion contract, 15% reported rarely being recognised and a further 24% reported never being recognised.

The 2004 Schrans report<sup>4</sup> observed that identification rates by venue staff dropped over time. The study found the identification rates dropped from 34% in the first month of the test, to 23% in month two and only 13% by month three.

The AUT Report concludes that processes need to be developed for enforcement of exclusion contracts by increased/better identification of patrons who attempt to breach their exclusion.

### The Call by Researchers to Invest in Reliable Self-Exclusion Enforcement Initiatives

Numerous studies call for an investment in technology that will improve the enforcement of exclusion orders. Many of the studies make direct reference to facial recognition technology.

The 2002 Nowatzki and Williams paper<sup>5</sup> recommended that computerised identification checks be explored.

The 2003 O'Neil<sup>6</sup> paper stated that it is appropriate for the gambling industry to invest considerable resources into reliable self-exclusion enforcement initiatives.

The 2004 Schrans paper<sup>7</sup> argued that self-exclusion programmes can only effectively be enforced if formal registration/identification systems are introduced at the point of entry to a gambling establishment or if exclusion processes are activated on each electronic gaming machine. The paper stated at pages xvii and xix:

It is virtually impossible for retailers to consistently identify even a limited number of players in the context of a busy social setting... Undoubtedly, the most effective way of improving identification rates within all player segments is to implement a method of on-site screening that is independent from subjective detection of "excluded" players through staff recognition...

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<sup>3</sup> Dickson-Gillespie, Ruple, Rosenthal, & Fong. (2008). Preventing the incidence and harm of gambling problems. *The Journal of Primary Prevention*, 29(1), 37-55.

<sup>4</sup> Schrans, T., Schelinck, T., & Grace, J. (2004). *2004 NS VL Self-exclusion programme process test. Final Report prepared for Nova Scotia Gaming Corporation*. Nova Scotia: Focal Research Consultants Ltd.

<sup>5</sup> Nowatzki, N.R., & Williams, R.J. (2002). Casino self-exclusion programmes: A review of the issues. *International Gambling Studies*, 2(1), 3-25.

<sup>6</sup> O'Neil, M., Whetton, S., Dolman, B., Herbert, M., Giannopoulos, V., O'Neil, D., Wordley, J. (2003a). *Evaluation of self-exclusion programs and harm minimisation measures. Report A*. Adelaide: The South Australian Centre for Economic Studies.

<sup>7</sup> Schrans, T., Schelinck, T., & Grace, J. (2004). *2004 NS VL Self-exclusion programme process test. Final Report prepared for Nova Scotia Gaming Corporation*. Nova Scotia: Focal Research Consultants Ltd.

Of far greater potential is the introduction of a systematic screening process that is consistent over time, over the various sites and is independent of staff's limited ability to recognize an excluded player... the most effective point of intervention would be at the gaming area or machine level.

The 2007 Williams paper<sup>8</sup> noted that the facial recognition technology that is used by some North American casinos for identification of card counters and cheats could be extended to detect self-excluders.

The 2008 Responsible Gambling Council<sup>9</sup> paper noted the potential for facial recognition technology to support multi-venue exclusion. The paper stated:

There are many opportunities for enhancing detection, including the addition of facial recognition software...

The introduction of facial recognition technology has the potential to be an important tool to support broad based bans.

The 2010 Hayer paper<sup>10</sup> called for action at a political level to introduce effective and efficient enforcement of access controls. The paper stated:

... the findings underline the benefits associated with self-exclusion. Essential improvements in financial situation, psychosocial functioning, and subjective feeling of well-being – at least in the short-term – confirm the necessity of including access restrictions as a central element in a comprehensive social-responsibility concept. Notwithstanding this basically positive conclusion, the empirical data indicate a need for improvement in various elements of the actual design and implementation of self-exclusion programs. In general, recommendations for action on a political level (e.g., the introduction or effective and efficient enforcement of access controls) can be separated from strategies that should be implemented directly by operators (e.g., the raising of awareness of the self-exclusion option and reducing the structural access barriers to this measure).

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<sup>8</sup> Williams, R. J., West, B. L., & Simpson, R. I. (2007). "Prevention of Problem Gambling: A Comprehensive Review of the Evidence." Ontario Problem Gambling Research Centre. <http://www.jogoremoto.pt/docs/extra/x5qah9.pdf>

<sup>9</sup> Responsible Gambling Council (2008). "From Enforcement to Assistance: Evolving Best Practices in Self-exclusion: a Discussion Paper." Responsible Gambling Council. <http://www.dhs.wisconsin.gov/substabase/docs/conftrain/2010/handout5oct28-2010.pdf>

<sup>10</sup> Hayer, T., & Meyer, G. (2011). "Self-exclusion as a harm minimization strategy: Evidence for the casino sector from selected European countries." *Journal of Gambling Studies* 27(4): 685-700. [http://gerhard.meyer.uni-bremen.de/index\\_dateien/JoGamblingSt\\_Selx-exclusion\\_2011.pdf](http://gerhard.meyer.uni-bremen.de/index_dateien/JoGamblingSt_Selx-exclusion_2011.pdf)