

# Submission in Response to the Player Card Gaming (PCG) and Cashless Gaming System Consultation Paper

## Introduction

While we understand the Government's commitment to reducing gambling harm, we have significant concerns about the proposal to introduce a mandatory **card-based cashless system** for Electronic Gaming Machines (EGMs). We believe the Government has overlooked the potential of enhancing the current **exclusion system** through **Facial Recognition Technology (FRT)**. Rather than implementing a completely new system, a **statewide database** integrated with FRT could be a far more effective and less disruptive solution for both players and venues. This would target harm minimisation in a way that is precise, automated, and cost-effective while also ensuring that responsible gamblers are not unduly burdened.

## 1. A Statewide Database with Facial Recognition Technology (FRT)

The existing exclusion system could be significantly strengthened by creating a **statewide FRT database** for players who voluntarily self-exclude or are identified as needing exclusion due to problematic gambling behaviour. Here's how this system could function:

- **Statewide Integration:** All gaming venues—hotels, clubs, and casinos—would be connected to a centralised exclusion database. This database would contain the profiles of players who are on self-exclusion lists or have been excluded by regulatory authorities due to gambling problems. When a player is added to the exclusion list, their image and information would be stored in the database and accessible to all venues across Tasmania.
- **Real-Time Detection:** FRT cameras would be installed at entry points and around gaming areas in each venue. These cameras would automatically scan faces as individuals enter the venue or approach gaming machines. When the system detects a match with a person in the exclusion database, an **instant alert** would be sent to venue staff for immediate intervention.
- **Automatic Enforcement of Exclusions:** The alert system would notify venue staff in real-time whenever an excluded individual attempts to engage with gaming activities. Staff could then approach the individual discreetly and prevent them from playing, ensuring compliance with their exclusion order. This automated process would eliminate the need for manual checks or reliance on players to disclose their exclusion status, reducing the risk of human error and ensuring consistent enforcement.
- **Continuous Monitoring:** Unlike the proposed card-based system, which relies on players managing their own pre-commitment limits, FRT allows for continuous, automatic monitoring. This system ensures that excluded players are identified as soon as they enter a venue, preventing any attempt to gamble before it happens.

## 2. Targeted Harm Minimisation through FRT

One of the key advantages of integrating FRT into the exclusion system is that it allows for **targeted harm minimisation**. This ensures that resources and interventions are focused on individuals who are most at risk, rather than applying blanket restrictions on all players through a mandatory card system.

- **Focus on At-Risk Players:** FRT would primarily serve those who have opted for self-exclusion or have been excluded by regulatory authorities. This approach would ensure that problem gamblers are protected from their impulses without inconveniencing responsible gamblers who do not require intervention.
- **Proactive Harm Prevention:** FRT allows for proactive prevention, catching excluded individuals before they have the opportunity to engage with gaming machines. This is far more effective than a system that only reacts once a player has exceeded pre-set financial limits, as is the case with the proposed card-based system.

### 3. Real-Time Alerts for Immediate Intervention

The real-time nature of FRT would make enforcement far more effective and timely compared to a manual card system. Here's how the alert system would function:

- **Instant Alerts:** When an excluded player is detected by the FRT cameras, an immediate **alert** would be sent to designated staff members via a secure system. Alerts could be sent directly to mobile devices, smartwatches, or centralised monitoring systems, depending on the venue's setup.
- **Discreet and Swift Intervention:** Upon receiving an alert, staff would be able to intervene discreetly and prevent the individual from playing. This method ensures that players are approached with sensitivity, reducing any embarrassment or public confrontation while still enforcing the exclusion.
- **Central Monitoring Option:** Larger venues, such as casinos, could have a **central monitoring room** where security staff oversee all gaming floors. They would receive alerts in real-time and could coordinate with on-floor staff to prevent excluded individuals from engaging in gaming activities.
- **Multiple Venue Alerts:** In the case of players who are excluded from all venues across the state, the system would provide **multiple venue alerts**. If the excluded individual moves from one venue to another, the FRT system would continue to detect them, ensuring that exclusion orders are enforced consistently regardless of location.

### 4. Efficient, Cost-Effective, and Scalable Solution

Implementing FRT would be a more efficient and scalable solution for harm minimisation than introducing a mandatory card-based system. It provides benefits for both the Government and gaming venues by reducing the operational burden while offering a more targeted and sophisticated approach to preventing gambling harm.

- **Less Disruptive for Venues:** Unlike the card-based system, which would require a complete overhaul of how venues operate—including new technology, processes, and training—FRT could be seamlessly integrated into the existing gaming infrastructure with minimal disruption. It would automate the exclusion process, making it easier for staff to manage while reducing the likelihood of mistakes.
- **Cost-Effective in the Long Term:** While there may be initial setup costs for installing FRT cameras and integrating the system with the statewide database, the ongoing costs would be minimal compared to managing a complex, statewide card-based system. FRT requires less day-to-day intervention from staff and is more efficient at enforcing exclusions, saving both time and money in the long run.

- **Scalable Across the State:** Once the statewide FRT database and infrastructure are in place, the system could easily be scaled to include new venues or expanded to cover other forms of gambling beyond EGMs. This ensures that the system remains adaptable and can grow alongside future regulatory changes.

## 5. A Missed Opportunity: Expanding ATM Limit Technology

We are also concerned that the Government's proposal ignores the effective **ATM daily limit system** that is already in place in Tasmania's casinos. ATM limits prevent players from withdrawing excessive amounts of money in a single day, providing a straightforward and proven method of harm minimisation. Extending this system to all gaming venues across the state would offer a consistent approach to managing player spending without the need for a card-based system.

- **Automated Cash-Out Limits:** Casinos already enforce cash withdrawal limits through ATMs, locking out cards once daily limits are reached. This is an effective tool for preventing excessive gambling, and it is perplexing that the Government has not considered extending this approach to other venues.
- **Less Confusion for Players:** A card-based system would impose new, unfamiliar restrictions on players, while extending the ATM limit system would maintain consistency across all gaming venues. This would reduce confusion and ensure that harm minimisation measures are easy to understand and navigate.

## Conclusion

The Government's proposed mandatory card-based system overlooks the proven effectiveness of the **current exclusion system**, which could be greatly enhanced by integrating **Facial Recognition Technology (FRT)** and a **statewide exclusion database**. FRT offers a targeted, real-time solution to identifying and supporting at-risk players, automating enforcement and reducing the operational burden on venues. By focusing on improving and expanding the existing system, the Government can achieve its harm minimisation goals in a more efficient and cost-effective manner.

In addition, the Government should give further consideration to expanding the **ATM daily limit system**, which is already in place in casinos and has proven effective at controlling player spending. Extending this system to all gaming venues would provide a familiar, consistent approach to harm minimisation without the complexity and disruption of a card-based system.

We urge the Government to reconsider its approach and focus on enhancing existing technologies that already work, offering a more balanced and less intrusive solution to managing gambling harm.

Thank you for considering our submission.

Yours truly

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