Campbell Town Hotel

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Jenny Cranston
Chair
Tasmanian Liquor and Gaming Commission

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Dear Chair

I am writing to you to submit our venues views on the government's discussion paper on 'Harm Minimisation Technologies'.
Our view is that the use of modern technology, along with staff training, is key to ensuring that a more effective harm minimisation scheme is achieved.

Our responses to the survey questions are as follows;

1. **What do you see as the benefits, costs and/or issues in implementing facial recognition technology in Tasmanian casinos, hotels and clubs?**
   Facial Recognition will assist venues and staff to help those people that need help the most. The current self-exclusion system does not work, but with the assistance of Facial Recognition, venues will be able to provide immediate help to those that need help.

   The use of modern technology allows Facial Recognition to be a more cost-effective system that allows funds to be distributed to where it is needed most (I.e., counselling and support for those in need).

2. **What do you see as the benefits, costs and/or issues in implementing player card gaming technology in Tasmanian casinos, hotels and clubs?**
   We are of the view that player card gaming is **not** a viable technology to reduce harm.

   The Stennings Report states that card-based exclusion systems demonstrate significant limitations.

   The Stennings Report cited a number of issues with card based self-exclusion schemes, including:
   - low take-up;
   - some questions regarding their ability to reduce gambler expenditure;
   - some concerns about the potential to result in increased gambler expenditure,
   - concerns regarding privacy;
   - poor cost effectiveness;
   - questions regarding the capacity of the systems to have a positive effect on gambler behaviour;
   - card sharing and multiple card use issues;
   - issues associated with data collection and retention; and

- issues around the high cost of implementation (eg Over the four year period to 2018/19, Victoria's YourPlay scheme cost nearly $6 million to establish and operate, just under $59 million in costs were incurred by the industry, and over $2 was million in costs were incurred by the gamblers themselves).

The majority of society do not have an issue with gambling, so any system, especially card based, should be of a voluntary nature.

We are of the view that card-based systems are old technology and gaming manufacturers are moving away from this to more 'in-game' harm minimisation measures for all players.

Pre-commitment systems are potentially open to human error.

Mandatory systems (like all prohibition systems in the past) will just lead to 'underground' gaming or unregulated gaming that is available on phones today.

3. **What pre-commitment feature or combined features would be the most effective in reducing gambling harm?**
Manufacturers are already looking at options through digital wallet technology, have quarantine wallet for winnings to go into and other new measures.

Like any harm minimisation measure, we believe it should be voluntary and be up to the individual.

4. **To what extent will the proposed features and processes assist players to minimise the risk of experiencing harm from gambling?**
More effort needs to be put into promotion of help, as well as staff training needs to be improved and staff can be better aware to direct patrons who may be experiencing difficulty to better and quicker counselling and support that these people may require.

It needs to be remembered that problem gambling is generally a result of other issues in peoples lives and staff need to be provided with the training to make informed decision on when to intervene and how best to help.

5. **Are there any other considerations the Commission should be aware of in implementing either technology?**
The use of modern technology is key to ensuring that a more effective harm minimisation scheme can be achieved. In addition to modern technology, effective staff training is also critical key to an effective harm minimisation scheme. This training should be provided by industry, as we are on the ground and our venue staff deal with this every day.

We support Facial Recognition in our venues to help our venue and staff identify excluded patrons. In addition an industry led training regime and a better public awareness campaign around the issues would also assist in reducing harm.

Regards,

Vanessa & Clayton Riley.

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