

The Tasmanian Quaker Peace and Justice Committee
Religious Society of Friends (Quakers) in Australia
PO Box 388, North Hobart, 7005

Facial recognition and player card gaming technologies to minimise gambling harm

Jenny Cranston
Chair
Tasmanian Liquor and Gaming Commission

Dear Jenny Cranston,

Thank you for the opportunity to respond to the concept of facial recognition and player card gaming technologies as tools to minimise gambling harm.

The Quaker Peace and Justice Committee does not believe that these measures will minimise gambling harm to any extent unless they are part of a suite of additional reforms

By themselves, they may provide some support to the few gamblers who wish to reform. Unfortunately we know from the Social and Economic Impact Study of Gambling in Tasmania that this is only likely to be up to 10% of problem gamblers. Others will simply avoid these technologies.

1. *Benefits, costs and/or issues in implementing facial recognition technology.*
 - a. For players. Players who wish to exclude themselves may find that the use of this technology will discourage them from being tempted to access the pokies; and should they try to attempt to enter a venue, they will be actively excluded. However, it is unlikely that many problem gamblers will opt in.
 - b. For venues. In adopting this technology, venues may gain some credibility as a responsible gaming venue. It would also enable venues not to accept responsibility for players' losses as it would place the responsibility on to the problem gambler to opt in. Venues would have to determine where they locate the technology and they would need to train their staff to determine how to remove someone who has been recognised as being excluded.
2. *Player card gaming technology*
 - a. For players. This technology would allow any gambler who chose to participate to resist getting carried away with impulse gambling as they can pre-set their limits. This could be helpful to the gambler who knows that they might get over-excited and spend far more than intended. However if this is an opt-in technology, it is likely to be resisted by problem gamblers. But as a mandatory technology, it raises privacy issues although it is more likely to be a useful tool provided that appropriate support is given to helping establish the commitments on the card, such as amount of money available for gambling and requiring breaks during gambling sessions.

- b. For venues: Again this sort of technology gives venues the excuse not to have to take responsibility for the gamblers' losses and it may give them some credibility in the eyes of the general public as regarding their care for problem gamblers. Staff would need to be trained to support clients in establishing their cards. It would take skill to determine appropriate commitment levels both as regards money gambled and length of sessions.
3. *The most effective pre-commitment feature/features:* The most effective pre-commitment features in reducing gambling harm would not come from a card, which would place the onus on the gambler, but on the technologies that would place the onus on the venue. Measures could include maximum bet limits, reduced spin speeds, reduced maximum jackpots; prohibiting losses disguised as wins; prohibiting near misses; and enforcing regular machine shutdowns to provide breaks in use.
4. *To what extent will the proposed features and processes assist players to minimise the risk of experiencing harm from gambling.* Unless they are introduced as part of a number of other reforms, and use of the card is mandatory, supported by a responsible set up, only gamblers who have recognised that they have a problem and are motivated to impose limits on themselves, would be likely to benefit. In order to minimise losses, additional reforms geared to minimise the punters' loss on the electronic gaming machines would be a necessary complement such as maximum bet limits, reduced spin speeds, reduced maximum jackpots; prohibiting losses disguised as wins; prohibiting near misses; and enforcing regular machine shutdowns to provide breaks in use. Reducing the number of hours that venues are open would also support minimising gambling harm.
5. *Other considerations:* If the Commission is serious about harm minimisation, it needs to acknowledge that the gaming profits come from peoples' losses, and that those losses often have devastating consequences on the gambler, their family and community. The Commission needs to accept that the profits from Electronic Gaming Machines must be restricted in order to minimise the losses experienced by the players. It is not enough to place the onus on the problem gamblers if they are to be continually tempted by the high availability of poker machines with their highly seductive, highly addictive technologies that are designed to mesmerise their players.

Sally McGushin

For

The Tasmanian Quaker Peace and Justice Committee

Tasmania Regional Meeting

Religious Society of Friends (Quakers) in Australia

PO Box 388, North Hobart, 7005