

Community sector - Anglicare, TasCOSS, Salvation Army, Uniting Church

Facial Recognition Technology (FRT)

- FRT is only as good as the exclusions list. Supportive of improving ease of access to the exclusion system through a more streamlined process, including the process for image capture and timing of enrolment. Acknowledge this is a separate process to the Commission's current investigation.
- Does little to prevent harm and this came through in the Stenning Report.
- Should consider the opportunity cost of investing in facial recognition technology over another mechanism that may provide a more substantive reduction to harm.
- Will require a solid regulatory framework with clear technical specifications ie privacy and not adding to shame/stigma, security of data collection, accessibility and storage, ensuring no misuse to encourage greater gambling.
- Successful implementation will rely on staff training to intervene once there is an alert.

Player Card Gaming (PCG)

- Offers greater benefits than FRT, but is dependent on the controls attached to the system. Noted that could effectively self-exclude by setting PCG limits to zero.
- Supportive of limit setting as part of the set up process (start with a default limit, lock-out periods, can manage limits after a cool-off period)
- The system should be centralised, so that the same card can be used across all venues and machines (as is the case in Victoria)
- Should be a universal system (sometimes referred to as mandatory). Thereafter, make sign up as flexible and simple as possible (either in venue/online), identification requirements (need to ensure a person can't receive more than one unique card. This could also assist with money laundering).
- A cardless PCG system, ie an app, with a PIN to access account at machine, might address some of the issues raised in relation to physical cards.
- Should also apply to interstate visitors, similar to travel cards or COVID check in requirements.
- Collection of de-identified data will provide a rich data source for government research - if data points are valid, linked to individual users. Data not to be used for marketing purposes.
- Mixed views on a cashless system, noting it could increase rate of play, increasing the total loss for a person gambling, rather than increasing the rate of loss.
- Other points -
 - Adding loyalty schemes would increase risk.
 - UC prefers card to insert to operate the machine, but then cash to play the machine (as per VIC) - no ability to play the machine if card is not used.
 - Who would approve limit increases?
 - Raised activity statements as a useful way for players to track activity - but mailing to home may cause issues
 - Cashless systems carry the risk of facilitating money laundering, especially refining (converting small notes to large ones, based on the experience of the anti-money laundering regulator in Canada).
- Emphasise that within parameters of a universal system users have choice.
- Phased implementation offers the ability to bring on additional functionality as it is developed.
- Timeframes - 18-24 months. Need to balance getting mechanisms in place to provide support, and getting the right mechanisms in place which may take time to develop/adapt from other jurisdictions.
- Staff training is key to successful implementation.