

Tasmanian Government response to the Tasmanian Liquor and Gaming Commission’s Report to the Treasurer on its Investigation of harm minimisation technologies: facial recognition and player card gaming

The Tasmanian Government commends the Commission for the breadth of work conducted for the investigation and extends appreciation to stakeholders that contributed to the consultation. The Government has accepted all recommendations and will work with the Commission to implement the first state-wide mandatory player card gaming system with pre-commitment in Australia, further strengthening gambling harm minimisation for the Tasmanian community. The table below provides a response to each of the recommendations.

Commission’s Recommendations	Position	Comments
<i>Player Card Gaming Technology</i>		
<p>Implementation of a mandatory registered card for EGMs in all Tasmanian hotels, clubs and casinos.</p> <p>The registered card system should operate as follows:</p> <ul style="list-style-type: none"> – require registration to participate for all players with a single card issued to each player with a PIN (guest cards to be issued with an expiry date); – be cashless, with funds loaded onto cards using cash or debit card via EFTPOS only at a cashier desk; – provide messaging about player activity, such as money lost or won and time spent at EGMs. 	<p>Agree</p>	<p>The Government will introduce a PCG framework for all hotels, clubs and casinos in Tasmania requiring a registered card to play EGMs anywhere in Tasmania.</p> <p>The Government notes that the provision of a card-based gaming solution formed part of the recent Licensed Monitoring Operator tender, and the cost will be a regulated fee overseen by the Commission. The Government anticipates that venues will retain a greater percentage of their turnover under the new FGM arrangements than under the current arrangements even taking into account the costs of card-based systems.</p> <p>The Government accepts the card functionality recommended by the Commission and casino operators will be consulted to determine what enhancements are needed to their existing PCG system so that a person can use the same card in any gaming venue. The Government will negotiate with the Monitoring Operator to develop a cashless system across multiple venues and with the casino licence holders to integrate the systems.</p> <p>The Government agrees to the:</p> <ul style="list-style-type: none"> • establishment of a simple registration process with minimum requirements; and

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		<ul style="list-style-type: none"> development of policies to: protect privacy and personal information; mitigate potential harms of cashless gaming; and identify the type of messaging that is most effective.
<p>Pre-commitment functionality that should be mandatory for all players, state-wide and simple to use for all gamblers.</p> <p>The pre-commitment system should operate as follows:</p> <ul style="list-style-type: none"> – prescribe maximum concurrent default loss limits, initially set at a daily limit of \$100, monthly limit of \$500 and annual limit of \$5 000. These limits should be reviewed after a period of operation, with any adjustment informed by the data collected; – players have the discretion to set lower loss limits (taking effect immediately). Any subsequent increase up to the default loss limits should take effect after a cooling off period; – players should be able to apply for higher limits above the default loss limits where they can demonstrate the financial capacity to sustain those losses (in accordance with a process to be determined by the Commission); – when a loss limit is reached, gaming activity will not be allowed until the next default period; 	<p>Agree with clarification</p>	<p>The Government will mandate pre-commitment features as an essential part of the PCG framework.</p> <p>The Government agrees that pre-commitment will have the most impact on minimising gambling harm and accepts the system functionality, including the concurrent default loss limits, proposed by the Commission. The Government agrees that these limits are a reasonable starting point in the absence of Tasmanian data for hotels and clubs, and should be reassessed as sufficient player activity data becomes available.</p> <p>The Government agrees that the PCG design should maintain player choice by enabling lower and higher limits to be applied as their discretionary spend allows. The Government is cognisant that an increase in the default limits is a risk that must be managed well and any policy parameters will consider usability by both players and industry, the enhancements required to the casino operators' existing PCG system to accommodate concurrent limits, and the impact on venues and gamblers generally. It is important the model achieves the right balance between protecting players at risk of spending more than they can afford, and not overly affecting player enjoyment and support for the use of pre-commitment. For these reasons, the Government will provide the Commission with the following direction on the parameters to be used for the application process to allow players to set higher limits. The certification standard to be set by the Commission is subject to any variation identified through consultation with relevant stakeholders including the Monitoring Operator and finance industry. These limits and the processes for increasing limits should be reassessed after 12 months of operation.</p>

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<ul style="list-style-type: none"> - messaging about progress towards limits will be accessible to players; and - functionality should be available to implement the setting of play limits for breaks in play and maximum play periods. These limits are to be considered by the Commission based on further research, but initially an automatic break of 10 minutes after two hours of continuous play could be introduced that applies to all players. 		<p><i>Request to increase daily and monthly limits (within annual limit of \$5 000):</i></p> <ul style="list-style-type: none"> • players can increase the daily limit up to \$500 or the monthly limit up to \$5 000 (but remain within the annual default limit) by completing a simple request at the venue; • the venue will continue to apply responsible service of gambling practices as part of processing the request; • the venue will advise the Licensed Monitoring Operator to initiate the player's daily/monthly limit change. <p><i>Certification to further increase annual/monthly/daily limits:</i></p> <ul style="list-style-type: none"> • a condition be imposed on players requesting an increase to either the annual default loss limit or an increase in the daily limit above \$500 or monthly limit above \$5 000 that they must produce certification to a standard set by the Commission confirming the player's capacity to sustain the proposed level of loss at the player's cost; • recertification be required every 12 months confirming that the player has maintained their capacity to meet the losses; • requests for further limit increases cannot occur prior to expiry of the relevant default period; • certification (including updates) be provided to the Licensed Monitoring Operator to initiate the player's limit changes (the process is to be confirmed with the LMO and the requirements for casino operators to use the same system have been established); and • if certification is not met, the player's account must automatically revert to the default limits.

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To support effective state-wide operation, the system should be administered centrally, ideally by the Licensed Monitoring Operator.	Agree	The Government will consult with the Licensed Monitoring Operator and the casino operators on the development of a centralised host system.
The system should allow aggregated, de-identified data to be used by the Commission to inform gambling harm minimisation strategies.	Agree	The Government will require the centralised host system to provide data that can be used to inform gambling harm minimisation strategies in the future.
A rigorous staff training program must be developed covering system operation and responsible service of gambling requirements.	Agree	<p>A training program is essential to the success of the PCG implementation and delivery of responsible gambling services. The Government agrees with stakeholder feedback that the training should be provided by industry and that the Tasmanian Hospitality Association is best placed to do so.</p> <p>As noted in the Commission's report, the training content will need thorough consideration and the Monitoring Operator will also likely need to be involved.</p>
The PPP mandatory pre-commitment scheme should continue to operate under a separate regulatory process.	Agree	The Government supports the Commission's view that the casino Premium Player Program pre-commitment scheme should continue to operate under a separate regulatory process.
Facial Recognition Technology		
<p>The Commission does not recommend implementation of FRT as it is not an effective tool for wider prevention of harm in gaming venues in Tasmania.</p> <p>In the absence of the introduction of a PCG system, the implementation of an FRT system similar to South Australia using a venue operated system, integrated with the TGES, to identify excluded</p>	Agree	<p>The Government supports the Commission's view that FRT is not an effective tool for wider prevention of harm in gaming venues (other than identifying already excluded persons).</p> <p>The proposed PCG system will ensure that excluded persons are prevented from playing EGMs.</p>

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persons could be considered. This option is subject to further consideration of the matters outlined in the Report, including significant concerns regarding privacy.		