

**From:**  
**To:** [LA Committee - JCS](#)  
**Cc:**  
**Subject:** Additional evidence for inquiry into cashless gaming  
**Date:** Monday, 13 May 2024 3:35:54 PM  
**Attachments:** [image001.png](#)

---

**Caution:** This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe. [Learn why this is important](#)

Dear Committee

I trust the Committee is aware of the recent data breach at numerous NSW gambling venues <https://www.abc.net.au/news/2024-05-02/clubs-nsw-cybersecurity-potential-data-breach-venues/103793584>, and a smaller number of ACT venues <https://the-riotact.com/canberra-club-members-believed-to-be-spared-worst-of-possible-identity-theft/766910>.

The second of the articles above notes the different lessons drawn from this breach by the Alliance for Gambling Reform and ClubsACT. The former argues that this supports a central cashless gaming system. If managed by Government, such a system could have very strict security provisions rather than the clearly inadequate diffuse, market-driven approach currently in place.

It won't surprise you to learn that ACTCOSS has a similar view to that of the Alliance for Gambling Reform, but I am writing to draw your attention to a slightly different point. The most recent data breach apparently involved potentially sensitive data, such as driver's licence information, of many people including politicians. This of course represents a security threat, but one that can be at least partially addressed through a new licence. What is fortunate for the million or so club users affected is that the breach does not appear to have involved biometric data. This cannot be changed, so once compromised the security threat is permanent.

One of the principle lessons that should be drawn from this incident is that gambling venues should not be encouraged or required to collect biometric data, such as that required for facial recognition systems. Indeed, if the clubs are an integral part of our community, for instance required as smoke refuges, then such practices should be banned because they pose an almost unavoidable risk to the population that needs to attend them in times of emergency. Government efforts to reduce gambling harm should stay well away from facial recognition technology. Should the Government rely on or endorse such a system, then when the next data breach occurs and people's immutable biometric data is stolen, the finger of blame will no doubt include both the gambling venues themselves and the governments which promoted such a scheme.

Thank you

**Dr Devin Bowles** (he/his) | CEO

**ACT Council of Social Service Inc. (ACTCOSS)**

**p** | **m** | **hrs** M Tu W Th F  
**e**

**a** [1/6 Gritten St, Weston ACT 2611](#)

Stay informed with the latest information by registering to receive [fortnightly ACTCOSS eNotices](#).  
To receive ACTCOSS media releases, please email: [communications@actcoss.org.au](mailto:communications@actcoss.org.au).



ACTCOSS advocates for social justice in the ACT and represents not-for-profit community organisations.  
[actcoss.org.au](#) | [Twitter](#) | [Facebook](#) | [Instagram](#) | **Raise the Rate for Good! [Join the campaign to get JobSeeker working!](#)**

*ACTCOSS is committed to reconciliation, acknowledges the traditional custodians of the land and pays respect to elders past and present.*