



WATSONIA RSL PRIVACY IMPACT ASSESSMENT



Watsonia RSL Sub Branch Inc. No. A0052325J

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PRIVACY IMPACT ASSESSMENT

Executive Summary

This Privacy Impact Assessment (PIA) evaluates the potential privacy risks associated with the implementation of facial recognition technology (FRT) in gaming venues and licensed premises. Watsonia RSL is dedicated to leveraging cutting-edge technology to promote harm minimisation, ensure regulatory compliance, and enhance safety and accountability for all employees, volunteers and patrons. This document outlines identified risks, mitigation strategies, and Watsonia RSL's commitment to upholding the highest levels of privacy and ethical standards at all times.

Project Overview

Purpose

The Facial Recognition Technology (FRT) system in operation at Watsonia RSL is designed to provide a robust solution for identifying self-excluded and banned patrons, supporting responsible gaming practices while ensuring compliance with privacy and regulatory standards.

Stakeholders

- Ottica AI: Technology system provider and data steward
- Watsonia RSL: Venue Operator responsible for implementing FRT for harm minimisation, employee and volunteer safety
- Patrons: Including self-excluded patrons, banned patrons and general visitors to the venue
- Regulatory Authorities: Oversight of compliance with legal requirements
- Privacy Advocates: Ensuring ethical and fair use of FRT technology

Scope

This PIA assesses the full lifecycle of biometric data handling, including:

- Temporary memory usage during facial recognition processes
- Mechanisms to ensure informed consent and transparency
- Governance and ongoing compliance practices
- Ethical considerations, particularly for banned patrons



PRIVACY RISK ASSESSMENT

1. Collection of Sensitive Information

1. **Biometric Data:** The FRT system analyses facial features to create biometric templates, which are held in temporary memory ONLY long enough to complete real-time comparisons.
2. **Legal Basis for Collection:** Watsonia RSL ensures compliance with the Australian Privacy Act 1988, leveraging informed consent mechanisms and lawful processing frameworks.

2. Necessity and Proportionality

1. **Necessity:** The FRT system plays a critical role in identifying patrons who may breach their self-exclusion agreements, aiding in harm minimisation efforts.
2. **Proportionality:** Watsonia RSL balances the benefits of FRT with privacy risks, ensuring the system operates within clearly defined and proportionate limits.

3. Consent

1. **Self-Excluded Patrons:** Consent is obtained through explicit agreements as part of self-exclusion registrations. Processes are reviewed periodically to ensure ongoing compliance.
2. **Banned/Suspended Patrons:** Watsonia RSL issues formal ban notices to individuals where practicable, ensuring clarity, transparency, and alignment with legal and ethical standards. Wherever possible, banned patrons are informed of the reason for banning and that a record of their banning has been placed with a high priority note in the FRT system.

4. Data Handling Practices

1. **Temporary Memory:** Biometric templates are processed and held in temporary system memory for comparison against registered databases. NO permanent storage of non-matching data occurs.
2. **Access Controls:** Data access is tightly regulated, with ONLY authorised personnel permitted to interact with the system.

5. Transparency

1. **Signage and Notices:** Clearly visible, plain language signage at venue entrances notifies patrons of FRT usage. Detailed privacy policies, including the PIA are made readily available on request.
2. **Public Engagement:** Watsonia RSL works proactively to address public and stakeholder concerns, fostering trust through transparency and open dialogue.

6. Accuracy and Bias

1. **System Reliability:** The FRT system is rigorously tested to maintain high accuracy rates, minimising the risks of false positives and discrimination.





MITIGATION MEASURES

1. Enhanced Consent and Transparency

1. Deployment of comprehensive entry signage highlighting FRT use and its purpose.
2. Watsonia RSL as an added measure of transparency will include QR codes on signage for patrons to access detailed privacy policies.
3. Watsonia RSL as a responsible venue operator will seek to establish a consent mechanism for self-excluded individuals, integrating such overt consent into the registration process.

2. Governance

1. Watsonia RSL's 3rd party supplier of FRT, Ottica AI will appoint a dedicated Data Protection Officer (DPO) to oversee compliance and privacy matters.
2. Internal policies are documented and regularly reviewed to ensure best practices.

3. Data Security

1. Use industry-standard encryption for data processing within temporary memory.
2. Design systems to immediately purge non-relevant biometric data post-comparison.

4. Banned Patrons

1. Ban enforcement is the sole responsibility of Watsonia RSL. Whenever possible, Watsonia RSL will issue formal ban notices directly to individuals, clarifying the reason, term, and implications of the ban. This is ALWAYS done with best endeavors, however FRT serves ONLY as an auxiliary tool to assist venue staff in monitoring compliance.

5. Monitoring and Review

1. Conduct independent privacy audits annually to ensure compliance with evolving standards and update Watsonia RSL Privacy Policy and Watsonia RSL Privacy Impact Assessment document accordingly.
2. Establish a feedback loop with ALL stakeholders for continuous improvement



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RISK ASSESSMENT

RISK	LIKELIHOOD	IMPACT	RISK RATING	MITIGATION STRATEGY
Collection without valid consent	Medium	High	High	Establish layered, consent mechanisms
Misuse of biometric information	Low	High	Medium	Enforce strict access controls and staff training
False identification or bias	Low	Medium	Medium	Continuously test and refine system accuracy in conjunction with system provider Ottica AI
Regulatory non-compliance	Low	High	Medium	Perform regular audits and training programs

CONCLUSION

Watsonia RSL remains committed to the responsible and ethical deployment of Facial Recognition Technology (FRT). By adopting robust privacy measures, prioritising informed consent, and actively engaging with ALL stakeholders, we aim to ensure the use of FRT serves both societal and individual interests.

RECOMMENDATIONS

1. This PIA is available and readily shared with ALL stakeholders and regulatory bodies and Watsonia RSL welcome any feedback in relation to this document.
2. Watsonia RSL seeks to establish regular contact with customers, members and stakeholders to provide updates, share insights, and address concerns about FRT use.
3. Watsonia RSL seeks to schedule regular reviews of this PIA and update processes to stay ahead of legal and technological changes.

