

MEETING CCTV STANDARDS

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Never before has there been such importance placed on ensuring your CCTV system satisfies the requirements to comply with the regulations provided by the gaming and liquor licence authorities. What are the requirements for satisfying these regulations and how are they objectively measured?



The current legislated compliance requirements for Victorian gaming venues stipulate the following:

'A venue operator must ensure that the operation of the gaming machine area and each gaming machine is subject to continual supervision. Supervision may be electronic or physical or a combination of both.'

However, as we know, the interpretation of this gaming regulation has evolved over the years as issues have arisen and technology has developed in gaming venues.

In the early 2000s, Tabcorp and Tattersalls developed voluntary CCTV guidelines for their venues to consider when installing CCTV systems to satisfy compliance with the gaming regulations.

These CCTV guidelines fundamentally related to areas that should be under surveillance, such as gaming machine rooms, cashier's desk and entrances, with recommendations regarding minimum recording frame rates for cameras and recording duration.

These recommendations were based upon issues in the venues at the time and the technology available.

However, there has never been certainty as to what standard of CCTV system will pass a gaming commission inspection, nor an objective means of measuring compliance.

Many a gaming venue has passed an inspection of their CCTV system when commissioning a new gaming room layout, but a year or two later can be advised otherwise after a spot inspection, although the gaming machine layout and CCTV coverage didn't change.

This comes back to the fact the guidelines are not specific enough, are too subjective and that compliance isn't

objectively measured. This makes it difficult for venue operators to be confident that they are satisfying their compliance requirements.

After Tabcorp and Tattersalls exit the gaming venue network in 2012 it is anticipated that the VCGR will review the CCTV regulations to ensure that minimum standards and objectives are more clearly outlined and are able to be objectively measured.

The current legislated compliance requirements for Victorian licensed premises vary, but most with the conditions on their licence for CCTV typically states that when live or recorded amplified music other than background music is provided, 'The licensee shall install and maintain a surveillance recording system able to clearly identify individuals, which shows time and date and provides continuous images of all entrances and exits, bars and entertainment/dance floor areas. The surveillance recording system must operate from 30 minutes before the start of the entertainment being provided, until 30 minutes after closure. A copy of the recorded images must be available upon request for immediate viewing or removal by the Victoria Police, or a person authorised in writing by the Director of Liquor Licensing, or otherwise retained for at



least one month. The position of the cameras will be to the satisfaction of the Licensing Inspector.

'Signs, as described below, are to be displayed in all areas subject to camera surveillance. Such signs shall read:

"For the safety and security of patrons and staff this area is under electronic surveillance."

Around 2004, an assessment was undertaken by the authorities to determine why the standard of vision from so many licensed premises was so poor.

After consulting many organisations involved in the hotel

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and security industries, a Regulatory Impact Statement (RIS) was released in May 2008 for proposed Liquor Control reform (Amendment) Regulations 2008, to prescribe standards for security cameras in high-risk licensed premises in Victoria.

This May 2008 document went into great detail about how 70 per cent of the CCTV systems installed into licensed premises, as a condition of their liquor licence, were sub-standard and it detailed the importance of improving the systems.

It nominated some options on how to improve the standards and nominated minimum frame rates and what it thought would be the costs for a licensed premises to achieve satisfactory standards.

The notion of identifying individuals at bars and entertainment dance floor areas is not viable because of the vast area and poor lighting.

The Australian Standards CCTV guidelines for identifying persons stipulate the following:

For face identification, the entire target person should represent not less than 100 per cent of screen height. It is assumed that a person's face (head) occupies around 15 per cent of a person's height.

All object sizes and images in the above measurements are assumed to be at optimum optical resolution, have good lighting conditions, be using the lowest compression setting for the system and be measured on a display device that shows 100 per cent of the camera image view.

Subsequently, the cost analysis is too low and flawed. It would cost much more, as far more cameras would be required and even still, the lighting would not be good enough to identify persons.

A further regulatory impact statement document was released in August 2009 with Chapter 14, 'Objective of prescribed security camera standards and assessment of options', acknowledging issues with the CCTV standards.

After consultation with the industry, they have realised it isn't viable to identify individuals at bars and entertainment dance floor areas and have suggested in Option 2 (proposed regulations) that it should be at recognition quality (see following extracts).

Accordingly, it is proposed to vary the current standards so that:

- Stored images exported from a video recorder placed at the entrance or exit of a licensed premises must, when exported as a still image, be of an adequate resolution and picture quality to enable subject identification.



- Stored images exported from a video recorder placed anywhere else on licensed premises (other than at the entrance or exit) must, when exported as a still image, be of an adequate resolution and picture quality to enable subject recognition.

Subject identification and recognition are two of the terms routinely used to assess or describe the performance of CCTV systems. They sit at the upper end of the performance spectrum. At the lower end are 'observe' and 'detect'.

Option two is consistent with the policies and standards recently approved by New South Wales' Director of Liquor and Gaming for 'in venue CCTV'. As is indicated in the guidelines issued by the Director, an identification quality image 'should be sufficient to enable the identity of an individual to be established.' A 'recognition quality' image, in comparison, should enable viewers to 'say with a high degree of certainty whether or not an individual shown is the same as someone they have seen before.'

Therefore, we have a situation whereby the liquor licence stipulates a condition for CCTV that cannot be met nor objectively measured.

The reference to the reliance on the 'in venue CCTV' standards in New South Wales is a major concern because this standard was withdrawn in November 2010 following the realisation that, 'there are some areas of technical uncertainty or ambiguity arising from the current drafting of the CCTV Standards...' (see Casino Liquor & Gaming Control Authority determination in November 2009 for Crows Nest Hotel).

The Victorian authorities need to consult with industry experts to ensure all interest groups are working together to maintain reasonable outcomes from CCTV systems in licensed premises.

Fundamentally, licensees don't have clear reasonable guidelines on what is reasonably required to comply and there isn't an objective method of measuring compliance.

If this situation isn't addressed soon, far too much time and money will be wasted arguing these issues in the courts. **C&PM**