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Banned Drinker Register: Interim report – Kimberley

Technology implementation and industry
perspective

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Table of Contents

1. Overview	3
2. Background and context	4
The Kimberley region	4
Policies to reduce alcohol consumption	4
The Banned Drinkers Register (BDR)	4
The Takeaway Alcohol Management System (TAMS)	4
Rationale for using targeted rather than whole-of-society policies	5
BDR and TAMS in the Kimberley	6
3. Operational data assessment	8
Scanning anomalies: banned but accepted	8
BDR population	9
Internet connectivity	9
Repeat purchase information	10
Alcohol purchase trends as indicated by scanner data	11
Summary of data assessment	12
4. Industry perspective on the BDR	14
BDR implementation	14
Impact on society: BDR	15
Impact on society: TAMS	16
BDR v TAMS: minimising harm	16
Efficiency and effectiveness of the BDR technology	17
5. Conclusion	18
Findings	18
Recommendations	20

1. Overview

The Government of Western Australia is committed to minimising the harm caused by excessive alcohol consumption.

In the Kimberley, there are two policy mechanisms that have been trialled in parallel: the Banned Drinkers Register (BDR) and the Takeaway Alcohol Management System (TAMS).

This summary report:

- details the quality of the data collected from the BDR scanners;
- documents the perspective of those using the scanners regarding the operation of the technology;
- identifies potential issues the operation of the technology;
- presents preliminary findings on impact; and
- identifies any areas for potential improvement.

The report is part of continuing efforts to measure the effectiveness of policies aiming to minimise excessive alcohol consumption. In future, it will be possible to compare locations with just a BDR to locations that have a BDR plus TAMS, and to consider the views of a range of stakeholders.

Note on crime activity analysis

A preliminary analysis of crime activity trends before and after the introduction of the introduction of the BDR was undertaken for the purposes of this report, but it did not show any statistically significant change that could be attributable to the BDR-TAMS trial.

2. Background and context

The Kimberley region

The Kimberley region is comprised of four local government areas in the North of Western Australia: Broome, Derby-West Kimberley, Halls Creek, and Wyndham-East Kimberley. The population in the region is around 40,000; and approximately half the population are Aboriginal. The mining sector, followed by the construction sector, make the largest contribution to economic output in the region. The health care and social assistance sector, and the public administration and safety sector have the greatest share of employment in the region.¹

Policies to reduce alcohol consumption

In Australia, the tangible costs of excessive alcohol consumption are around 1.0 percent of GDP, intangible costs are around 2.6 percent, and so total costs are around 3.6 percent of GDP.² Addressing the impact of excessive alcohol consumption is therefore an important public policy matter.

The Banned Drinkers Register (BDR)

A person registered on the BDR is prohibited from purchasing packaged alcohol to consume outside a licensed premises.

The BDR alerts staff working in liquor sales by comparing information from scanned identification documents such as a driver's licence to data held on the BDR.

People are listed on the BDR either because they have voluntarily elected to be on the BDR, or they are subject to a current Prohibition Order³ or a Barring Notice⁴. A person can contact the Department of Local Government, Sport and Cultural Industries directly to be added to the BDR voluntarily.

The Takeaway Alcohol Management System (TAMS)

The TAMS imposes daily takeaway alcohol purchase restrictions and is another policy that operates in the Kimberley.

¹ See <https://kdc.wa.gov.au/> for details for the economics profile of the region.

² Whetton, S., Tait, R., Gilmore, W., Dey, T., Agramunt, S., Halim, S. A., ... & Chikritzhs, T. (2021). Examining the social and economic costs of alcohol use in Australia: 2017/18.

³ Prohibition Order - issued by the Director of Liquor Licensing on application by the Commissioner of Police (Part 5A of the Liquor Control Act 1988).

⁴ Barring Notice - issued by the Commissioner of Police (or Delegate) (s. 115AA or the Liquor Control Act 1988).

TAMS places a restriction on the volume of takeaway alcohol that can be sold to a person on any given day. This restriction is by alcohol category type: (i) beer, cider, and pre-mixed spirits (11.25 L, which is one standard carton); (ii) wine (2.25 L, which is three standard bottles); (iii) spirits (1 L); and (iv) fortified wine (1 L); and the volume that can be combined across the categories. A person can purchase up to the limit from any two alcohol categories only.

Rationale for using targeted rather than whole-of-society policies

The combined BDR-TAMS process separates consumers into two classes.

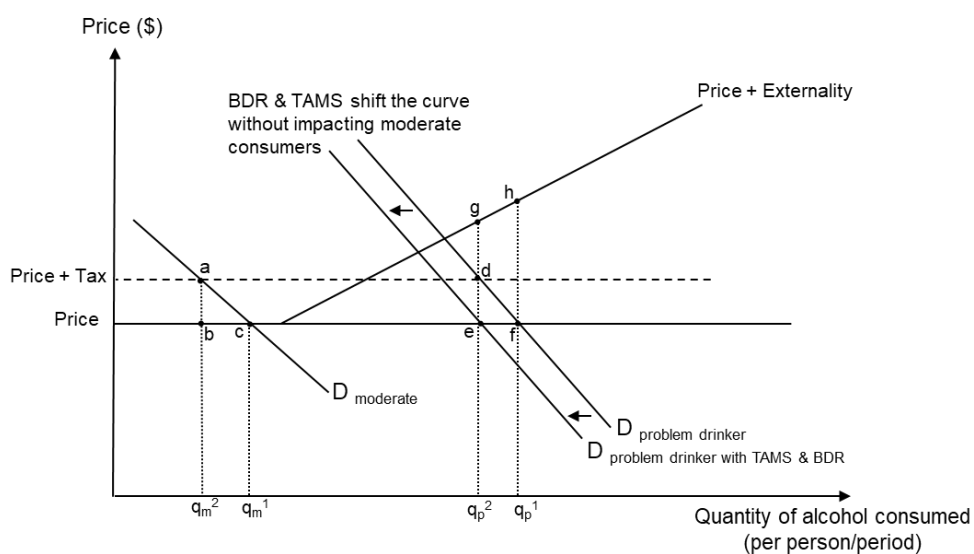
The first class are moderate drinkers, whose consumption imposes no negative externality cost on society. The second class are heavy and or binge drinkers whose consumption does impose an externality cost on society, referred to here as ‘problem’ consumers.

There is a different impact of policies such as the BDR and TAMS versus generic policies such as taxes. Any change to tax placed on alcohol will be passed through to the consumer, so that both moderate and problem consumers bear the cost proportionate to their consumption.

In contrast, targeted policies such as TAMS and the BDR by contrast have no impact on moderate consumers. Further, these policies aim to shift the demand curve for problem consumers so they can generate the same level of net society gain from reduced consumption without imposing a loss on moderate consumers.⁵ Targeted policies do however have greater administration cost compared to general policies, and these costs also need to be taken into consideration when evaluating policy effectiveness.

⁵ The model can be further expanded to include a group of consumers that are consuming at a non-optimal level, from an individual utility maximising position, due to addiction issues, or failure to consider all costs associated with alcohol consumption.

Figure 1: Targeted policies vs whole of society policies



BDR and TAMS in the Kimberley

The BDR trial in the Kimberley region had a soft launch in May 2021, and became fully operational in July 2021. The BDR complements other alcohol management policies in the region, such as TAMS.

TAMS has been in place in the Kimberley since March 2021. Since that time, licences to sell alcohol in the Kimberley have been subject to a condition that places a restriction on the volume of takeaway alcohol that can be sold to a person on any given day, as noted above.

Before the introduction of sales restriction conditions on alcohol sales licences, daily purchase restrictions in the Kimberley were imposed via alternative methods, as allowed under the provisions of the *Liquor Control Act 1988*.

Process for using BDR-TAMS scanners

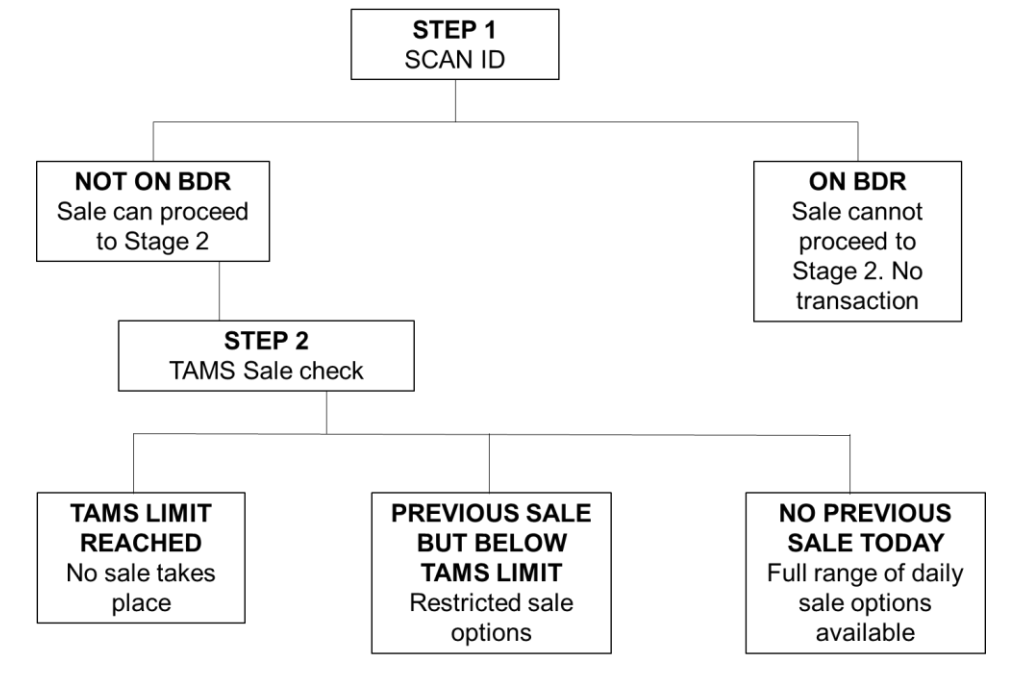
Combined BDR-TAMS scanners were installed in the Kimberley in all locations where takeaway alcohol is purchased.

To purchase takeaway alcohol, a person first provides an identification document such as a driver's licence. This is scanned into the BDR system. Retail service staff receive an immediate indication if a customer is on the BDR.

If the person is not on the BDR, the sale can proceed to the second stage. This involves retail staff checking the person's purchase history for that day. The person is then permitted to purchase takeaway alcohol up to the set volume in the set categories.

The overall process is illustrated in Figure 2.

Figure 2: Takeaway alcohol sales process in the Kimberley



3. Operational data assessment

Table 1 provides a summary of the recorded operator actions at stores with scanners installed over the first 12 months of the trial.

Table 1: Kimberley data distribution for first 12 months by operator action record

	Accept	Banned	Deny	Expired	Invalid	Not Acc.	Rescan	S115
No.	1,990,057	795	26,688	29,026	5,177	8,469	112,443	7,177
Percent	91.29	0.04	1.22	1.33	0.24	0.39	5.16	0.33

Although 91 percent of scans resulted in the identification (ID) being accepted, a rescan was required in 5 percent of cases. Reasons for rescans include that:

- the ID may not have been placed correctly on the machine or may have moved at the time of scanning;
- the ID presented may not be clear; or
- the ID may be of a type that the machine has trouble with, for example an ID where the age appears in a clear section of a driver licence, which is the case for some interstate driver's licences.

The number of people presenting at a store to purchase alcohol that are on the BDR is very small, comprising approximately 0.04 percent of all transactions. This was expected as the number of people on the BDR is relatively low. Further, those on the BDR may try to purchase alcohol at a store at one point in time to see if the system works, or may try when their period on the BDR has nearly ended to check that they are still on the register.

To validate the information recorded in Table 1, each store was provided with a summary of actions at their store. The store level feedback seems consistent with the data that has been processed. Second, a live demonstration was conducted at a fixed time to check the recording of actions in the database. Third, physical in-store checks were undertaken.

Scanning anomalies: banned but accepted

The proportion of banned scans was higher in the Kimberley than in the Pilbara. Further investigation of the banned scans revealed that in 366 cases, a banned scan was followed by an operator action of sale accepted.

This outcome can occur for two reasons.

The first reason is that after scanning an ID that shows as banned, and if no further operator action is taken prior to scanning the next ID, the system may record the previous non-transaction as accepted. This issue can be resolved through management of in-store workflow for transactions.

However, the second reason for a banned scan to be followed by an operator action of accept is due to a material technology failure, where people who placed themselves on the BDR voluntarily were not correctly linked to the system. That is, people that had placed themselves on the register were captured in the system as

banned but this was not clear to the machine operator at the time of sale, and so the transaction was approved.

This situation can have material consequences. A person may have placed themselves on the BDR because they did not want to be pressured into purchasing alcohol for someone that may be subject to a restriction on their ability to purchase alcohol.

Alternatively, a person may have placed themselves on the BDR as part of an alcohol consumption management strategy. If a person with a long history of using alcohols stops consuming alcohol, they may experience cravings for alcohol. The cravings are not constant but can be intense. An effective BDR assists these people to not purchase alcohol at these periods of peak craving.

BDR population

The number of people on the BDR over time in the Kimberley is detailed below. Initially the voluntary pathway was the most common pathway to the BDR, but over time Prohibition Orders have become the main pathway to the BDR.

Table 2: People on the BDR by pathway

Month	Barring Notice	Prohibition Order	Voluntary	Total
Jun-2021	3	10	19	32
Jul-2021	2	10	21	33
Aug-2021	3	10	24	37
Sep-2021	2	14	26	42
Oct-2021	2	17	27	46
Nov-2021	1	21	27	49
Dec-2021	1	21	26	48
Jan-2022	6	20	26	52
Feb-2022	6	25	27	58
Mar-2022	6	40	29	75
Apr-2022	6	41	29	76
May-2022	7	45	28	80

Note: People can exit and enter the BDR at any point during the month and so the values reported represent an average over the month.

It is notable that the number of people on the BDR has grown only slowly since May 2022. This pattern suggests that there is little prospect the number of people on the BDR will increase substantially with current policy settings.

Internet connectivity

Data collected in a wide range of venues indicate there are periods when the scanners are not active or not connecting to the internet, and in some instances the non-active/non-connected period is substantial.

Poor connectivity issues have a negative impact on overall alcohol management policy performance.

Repeat purchase information

An analysis of the scanner data to identified: (i) the extent of accepted transactions recorded against the same individual (or ID) at the same store within a given day; and (ii) the extent of accepted transactions for the same individual (or ID) in two or more locations on the same day.

a) Accepted scans: different venue, same individual and day

The data indicates that there were 2.41% accepted scans at multiple venues on the same date. In most cases of multiple accepted scans at up to two (93% of cases). There was one instance of an individual having accepted scans at eight Kimberley venues on the same day.

There may be many reasons for there to be more than one scan at different venues on the same day; however, where there are cases of many scans at different venues this could indicate an issue with the technology or connectivity, noting that information on actual purchase volumes is not available.

Table 3: Accepted scans for the same person, same day, different venues

Number of venues	Number of occurrences
2	26,543
3	1,695
4	157
5	24
6	7
7	2
8	1

In one example of a scan of multiple venues on the same, the first transaction at 12:18pm, then transaction in different locations spaced at the following time gaps: 8 mins, 7 mins, 13 mins, 4 mins, 22 mins, and 5hrs 4 mins. Such a pattern is consistent with store hopping.

Another indicates a transaction early in the morning, and then a series of transaction starting at 4:59pm, where the gaps between transactions in different locations are 8 mins, 12 mins, 4 mins, 6 mins, and 6 mins, for a total of seven transactions on the same day, at different locations.

Overall, the data suggests venue hopping to purchase more than the daily allowable purchase limit. Purchases at two stores might indicate shopping for products on special at two different stores, but purchases at many stores cannot reasonably be explained as shopping for specials. A pattern of many transactions with the same hash code suggests potential issues with the way the overall alcohol consumption management system is working in the Kimberley.

Multiple transaction issues could also appear if there are periods where internet connectivity is an issue, or may suggest underlying issues with the software platform. Instances of the system not working as intended can undermine the

public’s confidence in the overall approach to alcohol management in the Kimberley.

b) Accepted scans: same venue, same individual and day

There are instances of up to 14 accepted scans for an individual on a single day at a single venue.

Table 4: Accepted scans in same venue for same person and the same day

Number of accepted scans	Number of occurrences
1	807,383
2	388,497
3	8,906
4	4,183
5	367
6	128
7	27
8	8
9	3
10	1
14	1

c) Interpretation of a high number of repeat accept scans

Some repeat scans are very close together, and may be associated venue staff testing or demonstrating the system.

In other repeat scans, there are also clusters of transactions only seconds apart, but there is more than one cluster of scans during the day. This could again be transactions associated with shift changes at the store and additional testing, or other store operating procedures at these stores at these times.

d) Interpretation of a low number of repeat accept scans

Where there is a single repeat ID observation at the same venue there may be a number of explanations. Where the repeats are close together in time these records may also represent testing. Where the transactions are more spaced out through time, the transactions might represent two actual sales transactions.

Alcohol purchase trends as indicated by scanner data

The data collected indicated:

- the increase in alcohol purchases during the tourist season, as anticipated;
- a weekly alcohol purchase pattern as expected, with an increase in sales on Friday, and less sales on Sunday, when trading restrictions are in place in some locations;

- a daily peak in median sales occurring around store opening times with a second period of elevated activity from around 4:00pm through to 6:00pm; and
- the majority of transactions are in Broome, followed by the other major population centres in the Kimberley.

Scanner usage data also indicated although the general pattern of usage matches the expected pattern, there are scans outside the expected operating period for venues in the Kimberley. Although many of these transactions may be related to operational testing, it would be valuable to have processes that allowed individual data records to be checked at short notice, to establish that the records are machine testing only.

Summary of data assessment

The fundamental issue with the data is that it is not possible to establish a clear understanding of what is happening in the store with respect to actual sales activity versus testing activity.

To try and understand this, store operators were asked about the frequency of return customers who purchased some alcohol previously in the day, but not their full daily allocation, and hence has some ‘greyed’ out options for purchase.

Of those that responded to this question: 36% said many times per day; 21% said several times per day; 14% said once or twice per day; and 29% said once or twice per week. No respondents selected a lower frequency rate.

Store operators were also asked about return customers who had already purchased the maximum daily allowance.

Of those that responded to this question: 18% said many times per day; 55% said several times per day; 18% said once or twice per day; and 9% said once or twice per week. No respondents selected a lower frequency rate.

Store operators also reported that there can be a range of reasons for repeat visits: For example, a quote from a store operator:

There are many times per day where a customer has already made a purchase that day, and are purchasing more items within their allowable limits. This can sometimes be customers who are genuinely shopping around for competitive prices.

There are also often instances where a customer will attempt to purchase products where they have already bought their allowable volume of that particular product e.g. they've already bought a bottle of spirits from another retailer, come in and attempt to purchase another bottle of spirits.

This suggests that TAMS is having an effect, but also that there can be valid reasons for visiting multiple stores on the same day.

It would be helpful to develop a system with some established fixed reference scan ID cards that could be used when conducting machine testing. The unique hash

code for each store card could then be noted and machine testing transactions could then be excluded from all other transactions.

Test transactions also have the potential to contaminate other transaction data. For example, during a period of testing, there is no issue for a case of a scan result indicating that a person is on the BDR and a subsequent operator action of accept, as no actual sale of alcohol takes place. Conversely, a real world transaction showing a result of operator action accept for a scan result of banned is a matter of material concern.

A related issue concerns manual overrides. There can be many valid reasons for processing a manual override. For example, those working in the international shipping industry may have a Seafarers card only. Such people cannot be on the BDR, and there are generally good local relationships in the locations that seafarers come ashore, eg a shuttle service to town. . However, the ability to enter nonsense entries as part of the manual override system exists, which should be resolved.

4. Industry perspective on the BDR

Industry participation in the program was voluntary, but industry engagement is essential if the BDR is to be successful. The identification of potential technical improvements is therefore essential to this engagement. These improvements might also apply in other regions.

It is acknowledged that the industry responses represent a specific interest group which is essential to the operation of the BDR and TAMS. There are many other stakeholders who are not the focus of this summary report, but who are nevertheless important for the effectiveness of the policy.

Each store participating in the BDR was sent a store specific summary report and provided with a survey. Several rounds of follow-up correspondence were then sent to each store to encourage survey completion. The survey findings are summarised below.

BDR implementation

A minority of industry respondents (30%) indicated that the BDR had been implemented as expected. In contrast, 45% of industry respondents indicated that the BDR has not been implemented as expected, and 25% of respondents indicated they were unsure. This can be contrasted to the Pilbara region where 66% of industry respondents indicated that the BDR had been implemented as expected, and only 11% that it had not been implemented as expected.

A summary of the feedback from open ended questions for scanning issues is presented below. The overall theme of the comments is that operational usage issues are a day-to-day reality.

Comments from those responding *Yes* to the question of whether the BDR had been implemented as expected focused on issues with scanning and internet connectivity:

- *Sometimes have to manually enter the ID info. Some licences with the clear strip on the DOB, the scanner cannot read that information. Sometimes during a manual entry, the BDR system will revert back to the non-scan screen, so the team need to re-enter again. This can happen up to a half-dozen times per day.*
- *With regard to rescanning IDs. This is required many times per day largely due to connectivity issues. Also too, often a customer's ID may be old, worn, dirty, hard to read. Similarly with brand new IDs can be troublesome to scan. This requires attempted re-scans then manual entry. A high volume of times the ID scan does not pick up customers details correctly i.e. spelling, ID number, DOB. Sometimes the scanner will read the information but populate it in the incorrect field e.g. WA licence often picks up the expiry date instead of the DOB. Scanner also doesn't read the working with children card or firearms licence.*
- *The reliability of the machines/connectivity is a major issue. The success of the trial is contingent on the system working consistently and effectively. * In terms of issues with ID's presented: Current issues with QLD drivers licences. Often when the system cannot read the*

DOB, particularly licences with the clear strip on the DOB (e.g. NT, VIC). Dirty ID's or foreign language ID's are also not often read.

Comments from those responding *No* to the question of whether the BDR had been implemented as expected focused on the expectation that the BDR would be employed more:

- *I expected that Police would make greater attempts to put people on the banned register and was hoping that legislation to make this easier and allow other agencies to add people (similar to the Northern Territory) to the BDR might be fast tracked.*
- *The venue feels that the BDR is not being utilised to its full potential as local police do not have the ability to place individuals on the register in a timely manner.*
- *When we have a whole of government approach it will be one small part of a larger tool to change drinkers' behaviour at present a person can send alcohol in post or transport so is only targeting local supply not the hole supply. The black market is still a booming industry as there is a large profit to the persons supplying*

Comments from those responding *Unsure* about the effectiveness of implementation did not believe the trial was effective:

- *Basically a banned registry can only help if people who are at risk of harming themselves and others are found and banned. As such this trial will fail as the people banned are too small to make any social impact on the problem. Those who are banned or who would be banned are often unemployed, have no residency, have no car, so don't have driver's licences or other identification due to their social or mental predicaments so they won't present at bottle shops but they still collect their alcohol from persons who can.*
- *The final outcome is that an individual gets excessive quantity of alcohol per day, it would take 2.9 days if an individual drinks 1.5 drink an hour for all 24 hours, that's does not reflect harm minimising approach.*

Impact on society: BDR

Industry participants were asked whether they thought the BDR had had an impact on reducing problem drinking, antisocial behaviour, and social harm due to excessive drinking in both their local area and in the Kimberley.

There was not strong support for these statements overall. Generally, the proportion agreeing or strongly agreeing is only around one quarter, while the proportion either disagreeing or strongly disagreeing to each question is always more than one-half.

Open text responses that accompanied this question are provided below. Overwhelmingly, the sentiment reflects frustration at the low number of people on the BDR.

- *Just poor legislation of who can be banned and by whom. Having 28 people banned in the Kimberley or any number less than say 600 is a failure in the start. It won't achieve anything as the large group of people are not on it.*

- *It has great potential but has not been support through our court systems. Every person with an incident should be on this register for it to work.*
- *The more people on the BDR the more effective the trial outcomes will be.*
- *It might do if people were on it!*
- *The number of police reports and calls made to police in Derby has been overwhelming, dealing with intoxicated & robbery, unruly behaviour and more, sadly the reality is far from harm minimisation.*

Impact on society: TAMS

Industry participants were also asked whether they thought TAMS had had an impact on reducing problem drinking, antisocial behaviour, and social harm due to excessive drinking in both their local area and in the Kimberley.

The views on TAMS were only slightly more positive than for the BDR, with only around one-third of respondents either agreeing or strongly agreeing with each statement, and a little over two-fifths either strongly disagreeing or disagreeing with the statements.

Open text responses that accompanied this question are provided below, but the general flavour of the responses is that even with TAMS, people seeking a large volume of alcohol can still access a large amount of alcohol each day.

- *Basically a slab of beer, three wines and litre of spirit each individually are more than sufficient to cause problems. If all three groups are purchased there is enough to make three to four people intoxicated.*
- *An alcohol tax on % alcohol should replace the WET and Beer tax as this will reduce consumption by increasing the cost of lowly valued alcoholic products which are purchased due to their low cost and high alcohol contents by problem drinkers.*
- *Persons are able to obtain alcohol through shared family or cultural networks most of these exchanges are legal but there are boot leggers who supply alcohol illegally and who will always become a problem with any prohibition or excessive alcohol taxation. It's a balance between decreasing purchase by increasing cost of alcohol versus the creation of corruption and crime.*
- *Agree it has helped but the system is cumbersome.*
- *The limits for purchase are still too high.*

BDR v TAMS: minimising harm

In relation to the BDR minimising harm, 25% of respondents thought that the policy had been effective; 45% thought that it had not been successful; and 30% were unsure.

In relation to TAMS minimising harm, 35% of respondents thought that the policy had been effective; 35% thought that it had not been successful; and 30% were unsure.

This suggests that TAMS is seen by industry as slightly more successful than the BDR, but that neither policy is seen as especially successful by those operating venues that sell takeaway packaged alcohol.

Efficiency and effectiveness of the BDR technology

Industry participants responded to questions on BDR technology as follows:

- The BDR scanners are easy to use (65% Agree or strongly agree)
- The BDR scanners are reliable and work as intended (25% Agree or strongly agree)
- Scanning IDs on the BDR scanners is relatively simple (65% Agree or strongly agree)
- When there is a technical problem with a BDR scanner, it is resolved in an acceptable timeframe (20% Agree or strongly agree)
- Connectivity to keep the system online is not an issue (20% Agree or strongly agree)
- If there is an internet connectivity issue, it is resolved in an acceptable timeframe (20% Agree or strongly agree)

Although industry participants agree that the scanners are easy to use, there is material dissatisfaction with the technical aspects of operating the machines. The reasons for this dissatisfaction were detailed in the open ended question responses below:

- *Quite a few issues with the machine and the connectivity.*
- *These machine are slow and cumbersome. They regularly do not work. They regularly do not scan correctly. They regular drop out of service. They regularly take minutes to scan an id not seconds. Apart from them hopefully helping our region avoid full restrictions there is very little good to say about them.*
- *Internet connectivity is a major issue given the remoteness of the area. Issues are time-consuming to correct. The team must disconnect and reconnect the system many times. When the system was first rolled out, there was a direct and easy access to ... support. Now the team get the runaround to try and get issues resolved. They often have to leave a voicemail and 90% of the time do not get a call back within 24 hours. Perhaps SLA's need to be reviewed.*
- *Sometimes the scanners work really well. In theory they are easy to use, however system issues (in particular connectivity issues) make this more challenging.*
- *Sometimes have to manually enter the ID info. Some licences with the clear strip on the DOB, the scanner cannot read that information. Sometimes during a manual entry, the BDR system will revert back to the non-scan screen, so the team need to re-enter again. This can happen up to a half-dozen times per day.*

5. Conclusion

Findings

The survey responses from store owners suggest that the BDR has not been implemented as expected by industry. This is the opposite finding to the Pilbara, where a clear majority of respondents indicated that the BDR had been implemented as expected. There have been material issues with the BDR technology rollout in the Kimberley, and these issues may have contributed to a negative perception of the effectiveness of the BDR and other alcohol management policies in local communities.

1. The BDR was not implemented as expected.

The reasons implementation has not met industry expectations in the Kimberley include the following:

- a) Industry was expecting that a much more proactive approach would be taken to placing people on the BDR, and that there would be more pathways to placing people on the BDR.
- b) There are internet connectivity issues, in at least some locations, where upload connections are not made for up to a day, and this impacts overall system efficiency and effectiveness.
- c) Machines can be slow to scan IDs and repeat scanning of IDs is regularly required.
- d) The manual override function for sales can be used circumvent both the BDR and TAMS.
- e) A declining level of service from the service provider to address operational and maintenance issues as the trial has progressed.

2. There was a failure in the technology rollout.

During the first year of operation there was a material BDR implementation failure. Specifically, people that chose to place themselves on the BDR voluntarily were not correctly added to the system, and so were able to still purchase alcohol.

This administration failure had material consequences both for the individuals concerned and the credibility of the entire BDR program. For the individuals involved, the system failed support their wishes, whether relating to managing their alcohol consumption or mitigating pressure to purchase alcohol for other people banned from purchasing takeaway alcohol. This leads to a perception that the alcohol management policy and system as a whole does not work.

3. There is a need for increased community transparency.

Those implementing the system should acknowledge its failure to both individuals and the broader community, who may have heard through word of mouth that the system does not work. This is essential in re-establishing trust.

4. Improved system level monitoring is needed.

A regular testing process should be used to establish that the system works correctly. This could be achieved, for example, via a Department-held BDR scanner that is connected to the system which allows Department staff to independently verify details each week. Alternatively, a service contract could be established with a store in each BDR region, with appropriate confidentiality agreements, to run checks and provide a summary report.

5. There were in-store workflow issues.

When a transaction is not complete, and the next action is to scan a new ID, a record is created in the database for the incomplete transaction, before the new transaction record is started. The record for the incomplete transaction can show conflicting information. Revised advice to operating staff should be provided on the steps needed to resolve each transaction, including those transactions that do not proceed to an actual sale.

6. Machine testing may have contaminated the data set.

There are cases where the same ID is used many times, on the same day, in the same store; and also where the same ID is used at several different stores on the same day. These transactions could be related to in-store machine testing, which contaminates the overall data set.

7. There should be discussion on how to tackle purchase restriction avoidance.

However, some repeat purchases by the same individual at the same store or multiple stores is an overall alcohol policy management system level risk.

The extent of store hopping and multiple purchases at the same store is an area that should be further discussed with relevant store owners and the community. Whether or not implementing a one purchase per day policy at any given store, would be beneficial would need extended discussions with store operators, and other stakeholders in the local community.

8. Additional policy options should be considered to complement BDR-TAMS.

A range of additional policy approaches that could complement the BDR and TAMS are available to government. The additional value of approaches used in other jurisdictions, including Police Auxiliary Liquor Inspectors and Minimum Unit Pricing, should be explored with relevant stakeholders.

9. There should be investigation of the difference in voluntary referrals between regions.

The reasons for the difference in the proportion of voluntary referrals to the BDR between the Pilbara and the Kimberley should be formally investigated, and the results shared across all jurisdictions where the BDR is implemented.

10. A comprehensive cost benefit analysis should be undertaken.

Implementation and management of the BDR trial involves costs to society via the direct cost of the technology and via the Government staff time involved to manage

and operate the BDR. There are also costs to store owners via the extra staff time required to make a sale. Finally, there are costs to some consumers, especially tourists, when they do not have appropriate identification at the time of purchase.

The potential benefits of the BDR include a reduction in social harm, and lower costs to government through lower policing and legal system costs. At the end of the 24-month trial period a full benefit-cost assessment of the BDR should be undertaken, where both direct and indirect costs are measured, and contrasted to other possible alcohol management approaches.

11. There has been no evidence of impact on crime.

Across the major crime categories of: offences against persons; property crime; drug, stolen goods and weapons; other major crimes, there is no evidence that since the introduction of the BDR crime rates in the Kimberley have fallen. On balance the evidence suggests crime issues in the Kimberley have worsened. The rise in youth crime issues in the region in 2021-22 has been widely reported.

Recommendations

It is recommended that the findings above are addressed by:

1. Improving internet access plans to address both the internet connectivity issue and the slow scan issue.

Internet access plans, especially those that rely on the Sky Muster satellite network, were not designed with the needs of businesses connected to an alcohol management system in mind (the need for a continuous high upload option). There is an opportunity for the State government to work with internet service providers to ensure stores selling takeaway alcohol have high priority access to the limited satellite internet capacity.

2. Increasing the number of people on the BDR there is the opportunity to add additional pathways to the BDR. The pathways that have been identified and are under active consideration by the Government of Western Australia include:

- i) Expand the criteria for Prohibition Orders to include alcohol-related offending away from licensed venues.
- ii) Allow senior police officers to issue immediate short-term Barring Notices of 30 days.
- iii) Enhance voluntary registration pathways with actions such as frontline staff from relevant State Government agencies actively providing information on how to voluntarily register on the BDR and these staff also encouraging voluntary registration, where it is clear clients may be using alcohol at harmful levels.
- iv) Allow experienced staff at relevant State Government agencies, (e.g., emergency department health professionals, child protection case workers

etc.) who are experienced in client assessments, to apply to register an individual on the BDR, where it is clear the person is consuming alcohol at harmful levels.

- v) Ensure that people subject to alcohol access restrictions as part of Bail conditions, Parole Orders, Post Sentence Supervision Orders etc. are automatically added to the BDR for the relevant period of the restriction.
- vi) The perspective of residents and organisations in the Kimberley on these options should be sought.

3. Establishing new protocols for cases where the manual override function is used, and a regular process of collecting information from store operators established, for why the manual override was used. The feedback then needs to be integrated for system improvement such that the technology is updated to work for all major forms of ID, including those that contain clear sections, or systematically read expiry dates rather than the date of birth.

4. Establishing reference IDs for testing to avoid data contamination. Alternatively, the operator actions list could be revised to include the option of 'testing' and this would then also allow these records to be identified. The separation of testing records from actual sales records is important for understanding policy impact.

5. Implementing a regular service standard checklist survey to collate information on industry experience of technology provider service, with clear performance standards established for system maintenance. Meeting performance standards can then be linked to service contract payments.