



# **Player Card and Cashless Gaming Public Consultation Paper**

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October 2024

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## Our commitment to inclusion

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The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQ+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQ+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQ+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: <[salvationarmy.org.au/about-us](https://salvationarmy.org.au/about-us)>

More information about The Salvation Army is at **Appendix A**.



## Executive summary

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The Salvation Army welcomes the opportunity to provide this submission to the Tasmanian Treasury regarding the Player Card and Cashless Gaming Public Consultation Paper (the Consultation Paper).

In this submission, The Salvation Army has focused upon the considerations raised in the consultation paper, basing our response on our background as a provider of financial counselling and gambling harm services.

Our key focus of the consultation is that the introduction and operation of the card-based gambling system must concentrate on gambling harm reduction as the major goal. All functions and operations of this system must prioritise minimising gambling harm, including reducing the social, financial and mental health impacts of gambling upon community members and their families.

Discussion surrounding processes for increasing loss limits, cooling off periods, activity statements, and identity verification have all been filtered through this lens.

The Salvation Army has made **10** recommendations for the Treasury and Tasmanian Government to consider. A summary of these recommendations follows on the next page.



# Summary of recommendations

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## Recommendation 1

1.8 The Salvation Army recommends that the design of the card-based gambling system, at all times, prioritises minimising gambling harm through:

- *Incorporating identity verification throughout the card-based gambling system;*
- *Equipping community members with information regarding their total time and monetary losses through EGMs; and*
- *Installing points of friction and breaks in gambling to provide community members with time and space to reconsider further gambling.*

## Recommendation 2

1.14 The Salvation Army recommends that the card-based gambling system equip community members with relevant information to inform their decision to participate in further gambling, including:

- *The total time and money that they have lost to gambling on EGMs over the previous day, week, month and year;*
- *Information to contextualise this time and money, in terms of forgone activity or material consumption; and*
- *Presenting this information at the beginning, end and during periods of gambling.*

## Recommendation 3

1.17 The Salvation Army recommends that the card-based gambling system is kept separate from any memberships or loyalty schemes, and that no information be shared between the card-based system or these schemes.

## Recommendation 4

1.20 The Salvation Army recommends that the certification process to manage loss limit requests must be centrally coordinated by the Tasmanian Liquor and Gaming Commission, with a focus on the community member.

## Recommendation 5

1.24 The Salvation Army recommends that the certification process to manage loss limit requests verify the financial position of the specific community member. This should include household income, expenditure and existing financial commitments.

## Recommendation 6

1.25 The Salvation Army recommends that the certification process to manage loss limit requests does not rely on statutory declarations as a measure to increase loss limits.



### **Recommendation 7**

1.29 The Salvation Army recommends that community members' identity be verified against that of their card-based gambling card at various points to help prevent gambling harm and financial abuse. This should include at initial card issue, re-issue, loading funds, changing limits and withdrawing funds.

### **Recommendation 8**

1.34 The Salvation Army recommends that the receipt of activity statements be mandatory, but that the frequency and manner of these statements be chosen by the community member. Activity statements must provide the raw information of time and money lost, and must contextualise these losses in terms of opportunity cost.

### **Recommendation 9**

1.38 The Salvation Army recommends that data collected through the card-based gambling system be security stored centrally by the Tasmanian Liquor and Gaming Commission, to preserve the privacy of community members.

### **Recommendation 10**

1.40 The Salvation Army recommends that there be a sufficient cooling off period between raising a loss limit and its effect. A period of as much as 24 hours could be considered.



# 1 Considerations from the consultation paper

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- 1.1 The Salvation Army has chosen to respond to the following areas arising from the Consultation Paper.

## What issues should be considered around how a player can use their carded play account and access their account information?

- 1.2 The critical consideration of the player card and cashless gaming system, or the card-based gambling system, must be the minimisation of gambling harm. The Salvation Army sees how gambling harm can negatively impact individuals and their families, socially, psychologically, financially and physically.
- 1.3 One of the principals to be incorporated throughout the card-based gambling system must be to ensure that a community member's card is only able to be accessed and used by the community member whose identity is attached to it.
- 1.4 Our services see gambling harm as a factor behind many scenarios of financial abuse, and without suitable protections and checks in place, the card-based gambling system could facilitate this harm. Work must be done to ensure that a person cannot steal from or coerce a family member into using their card to access Electronic Gaming Machines (EGMs). Preventing this form of financial abuse is a key priority for The Salvation Army.
- 1.5 Identification verification must be incorporated at several junctures to, where possible, prevent misuse of the card of another.
- 1.6 Equipping community members with accessible information, including the total amount of time and money they have spent using EGMs, along with context of this must also be a primary consideration in the system design. This information must be able to be accessed through a community members' phone, and also at junctures in the EGM process, such as when loading the card, and the commencement and conclusion of gambling periods.
- 1.7 The Salvation Army highlights that whilst the card-based gambling process must not reduce barriers to community member's using EGMs, minor frictions discussed in the consultation paper are reasonable interventions which may encourage a community member to reconsider further gambling. This includes mandatory break periods, and the possibility of delays from increasing loss limits to take effect.



## Recommendation 1

### 1.8 The Salvation Army recommends that the design of the card-based gambling system, at all times, prioritises minimising gambling harm through:

- Incorporating identity verification throughout the card-based gambling system;
- Equipping community members with information regarding their total time and monetary losses through EGMs; and
- Installing points of friction and breaks in gambling to provide community members with time and space to reconsider further gambling.

### What information should a player receive from a carded play system and how?

1.9 It is important that the community member is equipped with the following relevant information for their gambling session to make an informed decision about further action.

#### *Money*

1.10 Community members should be able to easily see:

- how much money is accessible on the card;
- the amount they have lost gambling in the previous day, week, month and year; and
- how close they are to hitting their daily, weekly, monthly or annual loss limit.

#### *Time*

1.11 Time factors must also be considered. Community Members must be able to visualise their time spent gambling through EGMs. This should include a display of how long the player has gambled through EGMs in the previous day, week, month and year.

#### *Context*

1.12 Many community members will benefit from having their time and total losses contextualised, displayed in the form of every day factors. For example, knowing that an individual has spent 20 hours in the past week using an EGM is not as impactful as knowing that 'this is equivalent of seven AFL matches, or watching a film 12 times'. Similarly, monetary losses could be contextualised to increase the accessibility of the information presented. For example, knowing that a community member has lost \$5000 gambling in the previous 12 months, may be better communicated as 'the equivalent of five smart phones'.

#### *When*

1.13 These figures be displayed to the community member at the beginning, and end of each gambling session, as well as the beginning and end of the mandatory rest periods. This information should be made available to the community member when they make a withdrawal or deposit of funds on to their card.







## Recommendation 2

**1.14 The Salvation Army recommends that the card-based gambling system equip community members with relevant information to inform their decision to participate in further gambling, including:**

- The total time and money that they have lost to gambling on EGMs over the previous day, week, month and year;
- Information to contextualise this time and money, in terms of forgone activity or material consumption; and
- Presenting this information at the beginning, end and during periods of gambling.

[What issues should be considered for other programs, such as membership or loyalty schemes, that might use the same player card?](#)

1.15 The Salvation Army is not supportive of any kind of loyalty schemes or memberships being able to access or utilise data through the card-based gambling scheme. Doing so would risk the scheme becoming intertwined with inducements or incentives that may lead to further gambling and consequent harms.

1.16 Gambling incentives such as loyalty schemes or other benefits that may come from being a member of a pub or club, must be kept apart from the card-based gambling system. This is critical to fulfil the goal of minimising gambling harm.

## Recommendation 3

**1.17 The Salvation Army recommends that the card-based gambling system is kept separate from any memberships or loyalty schemes, and that no information be shared between the card-based system or these schemes.**

[A certification process will be required for higher loss limits requests. How stringent should this certification process be?](#)

1.18 The Salvation Army argues that the process for raising the loss limits on any community member's card must be centrally coordinated and done through the Tasmanian Liquor and Gaming Commission. The Commission already oversees the self-exclusion process and is free from conflicts of interest, making them better placed to judge requests to increase a community member's loss limit.

- 1.19 This removes the burden from venue staff, who are not adequately placed to judge the capacity of community members to cope with gambling harm. Venue staff may have relationships with community members which would impact their judgement and decision making, or be conflicted due to conditions of employment.

#### **Recommendation 4**

- 1.20 The Salvation Army recommends that the certification process to manage loss limit requests must be centrally coordinated by the Tasmanian Liquor and Gaming Commission, with a focus on the community member.**

[What evidence of financial capacity should be provided to support higher loss limits requests? Mechanisms could include such things as a statutory declaration attesting to financial security, completion of a checklist containing information on responsible gambling, endorsement letters from third parties etc.](#)

- 1.21 Proof of income will be a central piece of information needed to judge whether a loss limit can or should be increased.
- 1.22 The Salvation Army has seen the Household Expenditure Measure (HEM) utilised by lenders as a factor in judging a community member's disposable income and loan affordability. This, or a similar measure, could be employed to help deduce the capacity of a community member to afford a change to their loss limit.
- 1.23 Statutory declarations would be ill-suited to preventing gambling harm in this scenario. In many cases, community members who are eager to continue gambling, may sign a declaration without fully considering or acknowledging the implications to their household finances. There may also be situations where a community member will not have capacity to make this judgment.

#### **Recommendation 5**

- 1.24 The Salvation Army recommends that the certification process to manage loss limit requests verify the financial position of the specific community member. This should include household income, expenditure and existing financial commitments.**



## Recommendation 6

- 1.25 The Salvation Army recommends that the certification process to manage loss limit requests does not rely on statutory declarations as a measure to increase loss limits.**

At what points in the player card gaming process should a person's identity be verified, for example for card re-issue, when changing limits, loading funds onto cards or receiving payouts?

- 1.26 All the above listed junctures must involve an identity verification process.
- 1.27 As mentioned above, we hold the view that minimising gambling harm contributing to financial abuse, is critical. We see instances where family members or partners will coerce or steal funds to continue gambling. Without suitable protections, the carded gambling system process could facilitate financial abuse. Care must be taken to ensure the system does not do so.
- 1.28 While this process of identity verification may be difficult through the online portal mentioned in the discussion paper, it is critical that identity verification processes are folded in at the issuing, re-issue, loading of funds, receiving pay outs and when changing limits of cards.

## Recommendation 7

- 1.29 The Salvation Army recommends that community members' identity be verified against that of their card-based gambling card at various points to help prevent gambling harm and financial abuse. This should include at initial card issue, re-issue, loading funds, changing limits and withdrawing funds.**

Should player activity statements be mandatory or optional? For example, players can opt-in or opt out of receiving statements. How often should player activity statements be generated? What information would you like to see on a player activity statement?

- 1.30 Player activity statements are an important mechanism to keep community members informed of and accountable to their use of EGMs. It also keeps the context of their gambling front of mind. Mandatory, regular receipt of activity statements would be an ideal mechanism to keep community members informed of their time and monetary usage, and to equip them to make informed decisions about future gambling.



- 1.31 It is critical that there is a mechanism for community members to indicate their preferred delivery method and possibly the frequency of receipt. For example, postage delivery of a community member's activity statement may present a risk where another partner or family member may intercept the information. It is likely that the majority of community members will opt to receive their activity statement in an electronic format. This option, such as by email or text message, may present additional protection for confidentiality.
- 1.32 Some community members may wish to change the frequency of their activity statements, and this option should be available to them. There must, however, be a minimum frequency set for statements, for example one statement per year, to preserve the efficacy of this statement process.
- 1.33 We suggest that the information contained in the community member's activity statement could be similar to that already discussed; equipping them with information about the total amount of money they have lost through EGMs, as well as the time they have spent. We again highlight the benefit of information being contextualised to help community members attach a real-life value to the raw data of time and money lost.

#### **Recommendation 8**

- 1.34 The Salvation Army recommends that the receipt of activity statements be mandatory, but that the frequency and manner of these statements be chosen by the community member. Activity statements must provide the raw information of time and money lost, and must contextualise these losses in terms of opportunity cost.**

#### What issues and requirements should be considered in relation to the collection, storage, access and use of information and data collected via the PCG system?

- 1.35 Data gathered through the card-based gambling system is highly personal information. It will contain data on the income, spending, gambling and even risk habits of community members. It is critical that high level data protection is utilised to maintain and store this information safely.
- 1.36 Data collected through the system must be securely and centrally stored, with oversight by the Liquor and Gaming Commission.
- 1.37 Allowing individual venues to access or store this information presents confidentiality risks for community members and may be targeted by actors who could utilise this information against a community member. Ensuring there is a centrally coordinated system, prevents gaps in data sharing between venues which undermines the system, and enhances security of information.



### **Recommendation 9**

- 1.38 The Salvation Army recommends that data collected through the card-based gambling system be security stored centrally by the Tasmanian Liquor and Gaming Commission, to preserve the privacy of community members.**

From a harm minimisation perspective, how long should a delay be before an increase in a loss limit comes into effect? That is, how long should a cooling off period last?

- 1.39 The Salvation Army argues that a sufficient cooling off period is implemented to best ensure that community members do not experience significant gambling harm. Where a community member may wish to raise their loss limit, it is key that they cannot do so within the same period of gambling. A significant cooling off window of as much as 24 hours would provide time and space, and a helpful friction point which may prevent further gambling and associated harm.

### **Recommendation 10**

- 1.40 The Salvation Army recommends that there be a sufficient cooling off period between raising a loss limit and its effect. A period of as much as 24 hours could be considered.**

## 2 Conclusion

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- 2.1 The Salvation Army thanks the Tasmanian Treasury for the opportunity to have input into the design of the Player Card and Cashless Gaming system.
- 2.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from [government.relations@salvationarmy.org.au](mailto:government.relations@salvationarmy.org.au).

**The Salvation Army Australia Territory**

**October 2024**





## Appendix A About The Salvation Army

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The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: <  
<https://www.salvationarmy.org.au/>>

