

Tasmanian Player Card and Cashless Gaming Submission

October 2024

Recommendations

1. Players should be photographed when identified to register a player card, and this photograph should be connected with the player account.
2. Cards and gambling should not be connected to loyalty programs.
3. Cards should include a default time limit of 30 minutes which can be varied up to a total of 2 hours per day.
4. Lower risk gambling guidelines should be used along with discussion with responsible gambling officer when considering increased loss limits.
5. Mandatory breaks should occur every 30 minutes.
6. Data should be made available to researchers and organisations seeking to reduce gambling harm.
7. Integration of the player card system with the casinos should happen no later than December 2026.

Alliance for Gambling Reform

The Alliance is the only national peak body working to reduce gambling harm. We have over 60 supporting organisations in our network and 23 leadership local councils in Victoria who have an interest in reducing the exponential level of gambling harm in Australia.

We are a registered health promotion charity and are 100% funded by donations from individuals, foundations, trusts, local government and other sources that do not have ties to the gambling industry. We are not affiliated with any political party.

The Alliance for Gambling Reform has long advocated for public health reforms that are evidence-based and community-backed with the sole purpose of reducing and preventing gambling harm in Australia. Online gambling is increasingly becoming one of the biggest health issues we are facing as a country.

Card based gaming

The Alliance supports the use of card-based gaming for EGMs, where a single physical or digital card is connected to a centralised player account registered to the individual for use in all venues across the state.

The proposal for a pin attached to the card and a username and password attached to the account are also important to protect personal information as well as supporting prevention of gambling harms.

However, the Alliance believes that not only should the individual be identified at the time of establishing the account and receiving the card but should also have a photograph taken at the time of receiving the card when their identification documents are sighted. This photograph should be linked to the player account and card to guard against cards being used by another individual that isn't the registered player. Cards that do not have a photograph registered against the account along with basic personal information are at risk of being shared or stolen.

Including a photograph of the individual protects those who are excluded or have reached their time or loss limits and are at risk of gambling harm from borrowing a card from a friend or paying another player an amount of money to use their card. It also protects all players from attempts to steal cards, which could place physical safety at risk. It further protects venue staff from being exposed to altercations and venues from unknowingly putting individuals at risk of gambling harm or other harms.

Victoria's Crown Casino has successfully included a photograph taken at registration with their mandatory carded play system established in October 2023. The Alliance has seen this process on site at Crown and how it works for players from all around the world to establish carded play accounts registered to the identified and photographed individual. The Crown Casino brochure on carded play features information on why a photograph is a requirement.

WHY DO I HAVE TO HAVE MY PHOTO TAKEN?

Having a photo on your card is a security measure to prevent anyone else using your card. We understand some people don't want their photo taken, but it is a new requirement to play a Gaming Machine at the Casino.¹

The Alliance believes that cards and player accounts should not be connected to loyalty programs. There should be no ability to use frequency of gambling or amount spent on gambling for discounted or free goods or services or to gain points or credits to gamble further. Likewise there should be no ability to use spending on goods or services to gain points or credits to gamble.

Cashless gaming

The Alliance supports the proposed system of cashless gaming, removing the ability for cards or coins to be inserted or dispensed via the EGM. This is best practice to prevent money laundering.

¹ [crown-melbourne-casino-carded-play-brochure.pdf \(crownmelbourne.com.au\)](https://www.crownmelbourne.com.au/crowned-play-brochure)

Pre-commitment

The Alliance congratulates Tasmania for putting forward default daily, monthly and annual loss limits that set the benchmark for other jurisdictions when considering pre-commitment. Allowing players to reduce those loss limits at any time including in the venue also supports the prevention of gambling harm.

The Alliance would like to the opportunity to be consulted on the processes being developed by the Commission regarding the increasing of limits. We would like to see players interested in setting limits above the higher bracket supported by measures such as a conversation with a responsible gambling officer, who takes the player through a series of questions designed to allow them to explore their financial capacity to gamble.

Players seeking to increase their loss limits should be made aware of the Lower Risk Gambling Guidelines which were developed by the Canadian Substance Use and Addiction Centre and adapted for the Australian market.

The guidelines recommend:

- gamble no more than two per cent of your take home pay – AND
- gamble no more than once a week – AND
- gamble on no more than two different types of products²

The Alliance would also like to see default limits for total playing time, with the default set at 30 minutes per day, and increases of up to no more than 2 hours in total per day.

Mandatory Breaks

The Alliance strongly supports mandatory breaks as part of any efforts to reduce gambling harm. Disabling play via the system once the continuous play limit is reached is important to enforce these mandatory breaks.

However, the Alliance believes the suggested period of 2 hours with an enforced break of 10 minutes is not short enough to avoid significant gambling harm. We believe that playing for 30 minutes should be followed by a 10 minute break, where the player needs to step away from the machine. Playing for a further 30 minutes should then see the player leaving the gaming floor altogether for a minimum of 15 minutes, giving them a complete change of environment.

The Victorian Population Gambling and Health Study (2018-19) shows the majority of non-problem gamblers spend less than 30 minutes in a session and over 80% spend less than 1 hour. This compares to moderate risk and problem gamblers who are more likely to spend over 1 hour in a session.³

We believe this research supports the requirement of default time limits alongside mandatory breaks at 30 minute intervals, to reduce the likelihood of harm. Both time and loss limits are critical, and the Alliance often hears anecdotal evidence from those with lived experience that if there had been the requirement to set these limits and stick to them, they wouldn't have fallen into such deep levels of gambling harm.

² [Gambling guidelines to help avoid harm \(responsiblegambling.vic.gov.au\)](https://responsiblegambling.vic.gov.au)

³ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, Victorian population gambling and health study 2018–2019, Victorian Responsible Gambling Foundation, Melbourne.

Information collection and storage

The Alliance would like to see disaggregated information on player activity being made available on request to researchers and organisations looking to reduce gambling harm to support the development of gambling related policy and service provision.

Implementation

The Alliance supports the timeframe of December 2025 noting that there have been some technical concerns which have delayed the implementation of the new system from its original implementation date.

The Alliance would like to see the timeline for integration with casinos no later than December 2026 and reiterates concerns about any connection of the player card and account with loyalty programs.

Conclusion

The Alliance commends the Tasmanian Government on their proposed model for a player card and cashless gaming system, and believes that this proposed model will substantially reduce gambling harm in Tasmania as well as set the benchmark for other jurisdictions in reducing harm from poker machines.

Some small changes to the proposed model based around our recommendations would set the bar even higher.

The Alliance would be happy to meet with the Department or Commission to discuss our submission further.



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