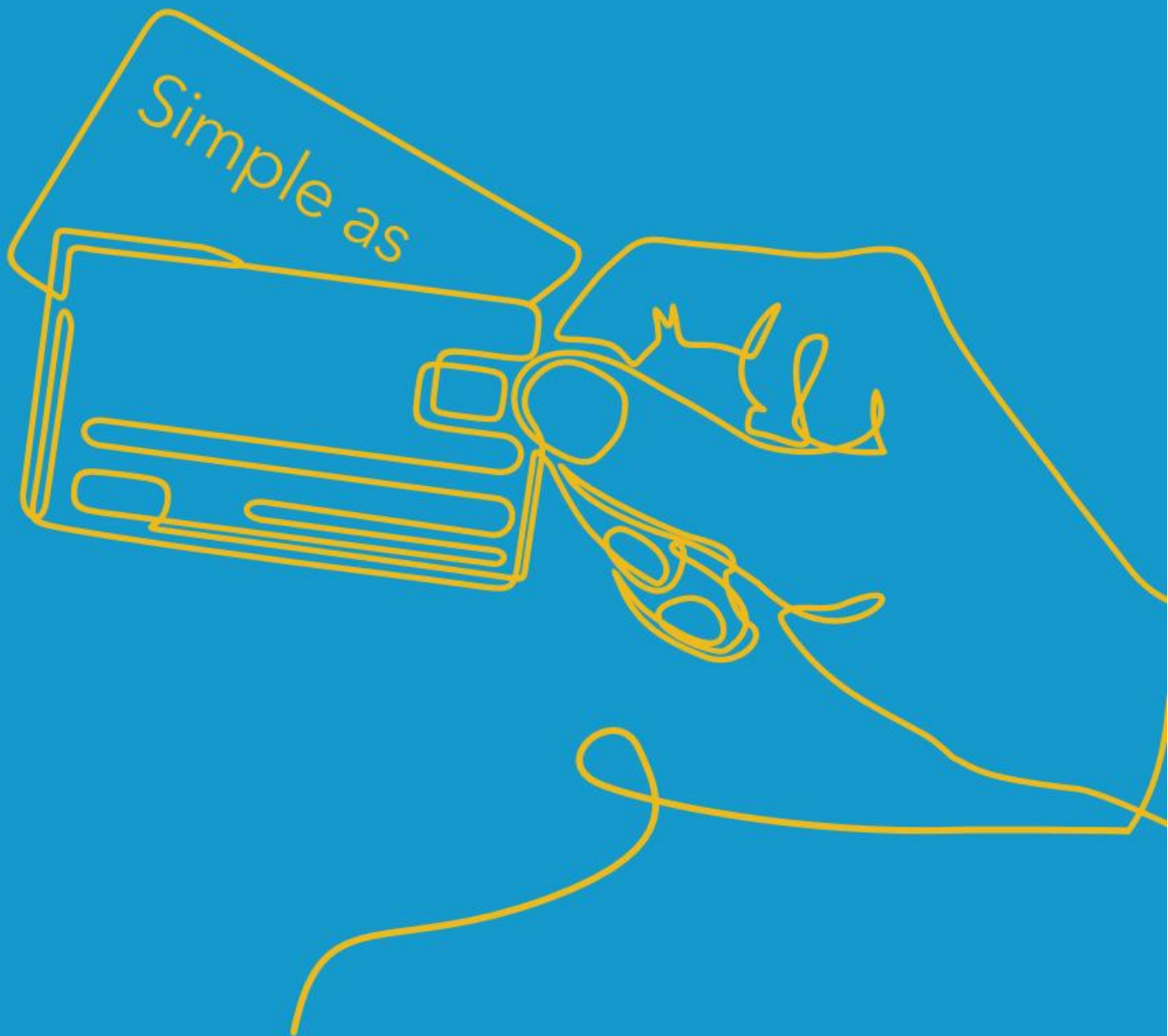


# Player Card and Cashless Gaming Submission to Public Consultation 2024



WORKING FOR  
A JUST TASMANIA



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Anglicare Tasmania acknowledges the Tasmanian Aboriginal community as the traditional and original owners and continuing custodians of this land lutruwita. We pay respect to Elders past and present.

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## About Anglicare Tasmania

Anglicare Tasmania is a large community service organisation in Tasmania with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport, Burnie, Sorell and Zeehan and a range of programs in rural areas. Anglicare Tasmania's services include: Housing Connect, crisis, short-term and long-term accommodation support; mental health support services; support services following a motor vehicle accident; aged and home care services; alcohol and other drug services; financial and gambling counselling; and family support. In addition, Anglicare Tasmania's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

Anglicare Tasmania's mission sees us strive to achieve social justice. We report on the effects of poverty and disadvantage in our State and provide decision-makers with policy responses to help build a more just society. We provide opportunities for people in need to reach their full potential through our services, research and advocacy.

Anglicare Tasmania's work is guided by a set of values which includes these beliefs:

- that each person is valuable and deserves to be treated with respect and dignity;
- that each person has the capacity to make and to bear the responsibility for choices and decisions about their life;
- that support should be available to all who need it; and
- that every person can live life abundantly.

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# Recommendations

Anglicare Tasmania welcomes the system proposed in the Tasmanian Liquor and Gaming Commission's [Player Card and Cashless Gaming Public Consultation Paper](#) ('Consultation Paper') because it will reduce gambling-related harm experienced by Tasmanians. This position is supported by Anglicare's experience in providing support services to Tasmanians experiencing gambling-related harm and research by its Social Action and Research Centre (SARC).

1. Anglicare Tasmania **supports the implementation of a mandatory pre-commitment card as proposed in the Consultation Paper including the following critical features to reduce gambling harm**, as set out in the Anglicare report [The Poker Machine Card. Simple As:](#)
  - binding pre-commitment with default loss limits
  - applying to all poker machine users
  - a single system across all venues
  - a single card per person
  - providing the cardholder with account statements and tracking of their gambling activity that empowers them to make informed decisions about their gambling (see recommendation 4 for additional detail)
  - ensuring that funds are loaded onto the card by the cardholder at a cashier desk, which enables venue staff to check that the use of the card is authorised (see related recommendation 3 below)
  - enabling the cardholder to instantly decrease their loss limit, including reducing it to zero
  - a robust process for increasing loss limits that has a cooling off period before the increase takes effect and minimises the risk of additional harm to the user or others (see recommendations 2 and 5 for detail)
  - ensuring the card system is simple and easy for people to use
  - enabling time limits to be set.
2. Regarding the **certification process for higher loss limits** (p.7, Consultation Paper), Anglicare recommends that the process:
  - documents evidence of the applicant's income in a manner that can be audited
  - is designed to prevent significant identifiable risks to third parties including dependents, other members of the applicant's household, and creditors (including other businesses)
  - is administered by an independent third party (for example, contracting a certified practicing accountant or similar professional to process applications)
  - is reviewed by the Tasmanian Liquor and Gaming Commission after 12 months of operation to assess its effectiveness in preventing gambling related harm.
3. Anglicare recommends that the **card-holder's identity should be verified** (p.10, Consultation Paper) when changing loss limits, loading funds onto cards, receiving payouts and on card re-issue.

4. Regarding **player activity statements** (p.10, Consultation Paper), Anglicare recommends that statements:
  - are provided monthly where the user has been active within the statement period. If there has been no activity in the statement period, a statement must not be sent. This level of reporting should be mandatory
  - should include:
    - i. a summary of the amount (AUD) spent, the amount won, the amount lost and the net position for the month
    - ii. the total time spent actively using the card for the month
    - iii. a summary of the same data (i and ii) for the 12 months to date
  - incorporate the findings and recommendations of [Better choices - Enhancing informed decision-making for online wagering consumers \(pmc.gov.au\)](https://www.pmc.gov.au/better-choices) and relevant design elements of the [Activity Statement Prototype \(dss.gov.au\)](https://www.dss.gov.au/activity-statement-prototype).
5. Anglicare recommends a minimum **cooling off period** of 24 hours before any increase to loss limits takes effect (p.12, Consultation Paper).

## Certification process for higher loss limits

In relation to the **certification process for higher loss limits**, the Consultation Paper asks:

- *How stringent should this process be?*
- *What evidence of financial capacity should be provided to support higher loss limit requests?*

In support of recommendation 2, Anglicare Tasmania provides the following additional input:

- A suitable option would be an application form (similar to online forms found at [Licence forms – Transport Services](#)) that includes:
  - the loss limit requested
  - applicant details
  - a statement of income and its source
  - a statement of dependents and child support payment obligations (if any)
  - completion of a gambling harm checklist
  - a signed declaration attesting:
    - to the applicant’s financial security and capacity to service existing debt
    - that sustaining the maximum loss would not unreasonably or unfairly impact the financial wellbeing of dependents or other members of the applicant’s household
  - authorisation to verify the information supplied.
- Accompanying documentation could include:
  - proof of income (with a range of options for providing such proof)
  - credit file.