

Player Card and Cashless Gaming

Preliminary consultation with industry

Confidential information for discussion

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Introduction

The Tasmanian Government has determined to implement a mandatory account-based cashless card system for Electronic Gaming Machine (EGM) play in Tasmanian hotels, clubs and casinos, including pre-commitment for both player loss and time spent playing.

The Treasurer has issued a Ministerial Direction to the Tasmanian Liquor and Gaming Commission (Commission) to implement this reform.

The key components of the Government's Direction for EGMs in Tasmania are:

- a common account across all EGMs regardless of location;
- default pre-commitment limits with a simple change process up to a set limit;
- a more comprehensive process to increase pre-commitment above the set limit; and
- state-wide cashless gaming.

The Commission, through the Department of Treasury and Finance, has further progressed the technical requirements for the implementation of a mandatory cashless player card gaming system with pre-commitment. The Commission is now able to provide a high-level overview of the interaction points by players and venues, acknowledging that the ultimate system may vary subject to the final system design.

This document sets out broadly how the systems will operate and gives an overview of the player and venue experiences in relation to the intended use of a player card, pre-commitment limits and cashless gaming for EGMs.

The paper refers to a new Player Card Gaming (PCG) System and a Cashless Gaming System which will interact with each other but are addressed separately.

The purpose of the overview is to enable discussions and feedback from industry. Preliminary consultation is intended to provide input to the technical and operational requirements for the system and does not focus on the Government's policy reflected in the Ministerial Direction.

To assist in understanding the proposed operation of the systems, an action taken by a player is indicated in red and action by venue staff is indicated in blue.

Definitions

Account-based: *There will be a single account for each player recording player information, gaming activity, available funds, pre-commitment limits etc. Anonymous play will not be permitted.*

Cashless: *Cash cannot be loaded directly onto the EGM, rather funds for play are accessed via the player card.*

Pre-commitment: *Before commencing gaming, a player commits to a maximum financial loss and may also limit the time spent gaming. Once the pre-committed limits are reached, the system will not allow further gaming to occur until the expiry of the relevant period.*

Note: The final system will vary taking account of consultation feedback and technical requirements that emerge through the design phase.

Player Registration

Account Creation

- **Player** commences the registration process through a web-based application and then attends a **venue** with identification and application reference **OR**
Player completes the entire registration process in **venue** with staff assistance.
 - *Venues would use PCG cashier terminal or could choose to purchase an additional tablet/kiosk to have a web-based application on.*
- **Venue** staff retrieve the application record using the reference number, or assist in completing the application, and confirm **Player** ID (sighting the ID but not keeping a copy at the venue).
- PCG system will check age, gambling exclusions, duplicate accounts and that privacy/data consents have been received and will then create the account.

Card Settings and Activation

- Mandatory loss limits must be set by the **Player** either in **venue** or **online** for daily, monthly and annual loss
 - **Player** can choose to:
 - use the default limits (\$100 day, \$500 month, \$5 000 year); or
 - set lower limits; or
 - set higher limits up to \$500 day and \$5 000 month, within \$5 000 year limit; or
 - apply for approval to set higher limits above \$500 day, \$5 000 month or \$5 000 year.
 - *Venues may choose to purchase an additional tablet/kiosk for players to utilise to set limits directly rather than advising staff of the amounts to set, or players can utilise the web-based application on their own mobile devices.*
- Voluntary gaming time limits may also be set by the **player** either in **venue** or **online**.
- Once the loss limits are set, **venue** staff encode/print the player card.
- **Player** sets a PIN for the card in the **venue** using the PIN pad or similar secured device.
- Player account and card are ready for immediate use.

Additional requirements for Visitor Card Registration

- When providing identification, the **Player** must also confirm they are resident outside of Tasmania, **venue** to sight ID but not retain a copy.
- When loss limits are set, a card expiry date will also be set in **venue**.
 - **Player** to choose a default expiry date or the date of departure from Tasmania.

Definitions

Player ID: *The principal player identification requirement will be an ID that shows a photograph of the player, together with their name, address and date of birth, such as a driver's licence or passport. The Commission will publish guidance as to acceptable forms of ID, including requirements where a player does not have access to photo ID.*

Privacy/data consents: *Players will need to authorise the use of their information for the purposes of the player card and cashless gaming system.*

Resident outside of Tasmania: *The residential address of the person shown on their ID is not in Tasmania.*

Venue equipment

The minimum equipment required in a venue will be:

- a card printer, PIN pad and blank cards;
- cashier terminal; and
- card reader, interface and display installed on each EGM.

The EGM will interact with the PCG and Cashless Gaming systems via the existing site controller.

Venues may choose to use other equipment, such as kiosks or cash redemption terminals, however these will not be required to implement base functionality and cannot be guaranteed to work at implementation without further development by the monitoring operator which may be at the venue's cost.

Definitions

Site controller: *is the in-venue host of the monitoring operator's Electronic Monitoring System and continuously monitors EGMs during play to ensure they are operating in accordance with regulatory requirements.*

Gaming Session

- A brief overview of a gaming session is outlined below. Further details of how the PCG system, EGM and limits interact are provided under 'EGM Play'.
- A gaming session commences when the player inserts their card into an EGM, enters their PIN and a valid account with no exclusion is identified.
- Player account data is transferred from the PCG and Cashless Gaming systems (hosts) to the local site controller.
- The EGM communicates with the site controller and EMS to manage the gaming session and monitor limits. The gaming session is conducted on the local network in the venue.
- The session ends when limits are reached and/or the player removes their card from the EGM.
- At the end of each session, player account data is transferred from the local site controller to update the PCG host system.

Definitions

Player account data: *refers to data that is stored in the host about the player (pre-commitment limits, funds available etc).*

Gaming session: *a period of gaming on an individual EGM that starts when a player card enables the machine and ends when the player card is removed.*

Site controller: *is the in-venue host of the monitoring operator's Electronic Monitoring System and continuously monitors EGMs during play to ensure they are operating in accordance with regulatory requirements.*

EGM Play (EGM play is disabled without an active player card)

Session Start

- **Player** inserts their card using the card reader on the EGM and enters their PIN.
- EGM communicates with PCG which checks for exclusion. If a player is excluded the EGM play remains disabled and the **venue** is alerted.
- If a player is not excluded and the account is valid, the PCG system checks loss limits and displays information to the player at the EGM.
- If a player has reached a loss limit the EGM play will remain disabled and a message will be provided to the player at the EGM.

Game Play

- EGM play is enabled and gaming session commences.
- **EGM reads available Player** funds from the player account.
- **Player** commences gaming.
 - PCG provides a message via the EGM or card display when the player is approaching a loss limit.
 - Where a jackpot win occurs, the **venue** is notified for payout (this is the same as the existing arrangements).
- If a **Player** reaches a loss limit:
 - the gaming session ends;
 - a message is displayed to the player;
 - the EGM play is disabled; and
 - the **venue** is alerted.
- If a **Player** has played EGMs for two continuous hours:
 - a message is displayed to the player;
 - the account / gaming session suspends for 10 minutes; and
 - the EGM play is disabled and reserved for the existing player for 10 minutes.
 - *The player may have the option to end that gaming session on the EGM or to suspend it and reserve the EGM for 10 minutes. If the gaming session ends the player cannot commence another session within 10 minutes.*

Session End

- **Player** ends their gaming session on an EGM (removes card or presses 'collect').
- The PCG system updates the player account and progress against the loss and time limits on the central PCG system, and the **Player** takes their card.
- **Player** collects any credits
 - Credits will transfer to the player account and become available funds.
 - Credits of \$1 000 or more must be paid by **venue** staff in accordance with the Commission's large payment rules (as currently exist, noting they may be amended for cashless gaming).

Definitions

EGM play disabled: *the EGM will be on and available as normal but game play will not be possible.*

Player management of pre-commitment limits

Decrease Loss Limit

- **Player** chooses to decrease limits **online** through a web-based application **OR**
Player chooses to decrease limits in **venue** with staff assistance.
 - **Player** to enter PIN
 - **Venue** to check ID
 - *Venues may choose to purchase an additional tablet/kiosk for players to use to set limits directly rather than advising staff of the amounts to set, or players can utilise the web-based application on their own mobile devices.*
- The PCG system will update the limits on the player account and the decrease of pre-commitment limits will take effect immediately.
- **Players** can choose to set their limits to zero.
- While not yet determined, it is likely that there will be a delay required (for practical reasons or as a cooling-off) before limits can be increased (potentially at least 24 hours).

Increase Loss Limit

There will be two processes for increasing limits depending upon the extent of the increase.

Increase Loss Limit - category 1

- This category of limit increases is intended to be simple and will apply to limit increases up to \$500 daily and \$5 000 monthly, both within the \$5 000 annual limit.
- **Player** chooses to increase limits **online** through a web-based application **OR**
Player chooses to increase limits in **venue** with staff assistance.
 - **Player** to enter PIN.
 - **Venue** to check ID.
 - **Venue** to apply Responsible Conduct of Gaming (RCG) requirements.
 - *Venues may choose to purchase an additional tablet/kiosk for players to use to set limits directly rather than advising staff of the amounts to set, or players can utilise the web-based application on their own mobile devices.*
- If a limit has been reached, it cannot be increased until the relevant time period has finished. For example, a player sets a monthly loss limit of \$3 000 and reaches this limit during the month. The player's monthly loss limit cannot be increased until the expiry of that month period.
- The PCG system will update the limits on the player account and the increase of pre-commitment limits will take effect after a cooling off period. It is proposed to be a minimum period of 24 hours.
- Limits can be lifted multiple times as long as they remain under the thresholds of \$500 daily and \$5 000 monthly and \$5 000 annually, and the limit has not been reached in the relevant period.

Increase Loss Limit - category 2

- This category of limit increases is intended to require a more comprehensive process before it is effective and will require some form of authorisation.
- It will apply to limit increases above \$500 daily, \$5 000 monthly or \$5 000 annually.

- The process for setting limits in this category is under investigation, but it will not be an immediate in-venue approval process.
- A limit cannot be increased again until that time limit period has finished. For example, a monthly limit that is set above \$5 000 cannot be increased a second time within the month.
- Any changes after the time period has expired will require a new certification / authorisation.
- Re-certification / authorisation of the higher limits will be required every 12 months.

Voluntary gaming time limits

- Gaming time limits will enable a player to limit the amount of time they spend playing an EGM. They are intended to be an additional feature for players, if they prefer to set time limits for themselves, in addition to the mandatory loss limits.
- **Players** will be able to alter these limits as they choose.
- **Player** chooses to change their gaming time limits **online** through a web-based application
OR
Player chooses to change their gaming time limits in **venue** with staff assistance.
 - **Player** to enter PIN.
 - **Venue** to check ID.

Definitions

Gaming time:	<i>the amount of time a player spends gaming on EGMs over a defined period. This does not have to be continuous play, but a total of all time spent gaming during that period (eg daily, monthly or annually).</i>
Daily limit:	<i>the limit to apply to a period of time that equates to a gaming trading day (not a calendar day).</i>
Monthly limit:	<i>the limit to apply to a period of one month from the date it is set (not a limit set on calendar months).</i>
Annual limit:	<i>the limit to apply for a period of one year from the date it is set (not a limit set on a calendar year)</i>

Lost PIN/Card or Change of PIN

- There will be a process developed to ensure that lost cards are disabled immediately once reported to the monitoring operator by a **venue**, or by a **player** online.
- Once a card is disabled, player funds are effectively protected. A comprehensive confirmation of identity process would be required for a player to receive funds from a disabled card.
- The system will prevent game play on a player card that has been disabled.
- If a player wants another card, the **player** will be required to confirm their identity to a **venue**, who may then issue another card, once confirming that the previous card has been disabled.
- **Players** will be required to set a new PIN on a re-issued card.
- Any existing limits on the player's account will apply to the new card.
- There will also be a process developed to manage a change of the PIN to ensure the PIN is being changed by the account holder.

Funds

- Funds will be held in a central account by the cashless gaming provider, linked to the identified player card account.
 - Funds will not be held on the card itself.
 - Venue funds will be reconciled in the back end by the cashless gaming provider.
- While the details of the mechanism for loading and retrieving funds in a cashless gaming system will be dependent upon the provider and technology utilised, the following process is likely.

Add Funds

- **Player** adds funds to their account at the **venue** cashier.
 - By cash or EFTPOS.
 - **Players** may be required to swipe player card and enter PIN.
- Adding funds from credit cards will not be allowed.
- Fund load limits may be imposed, however this requires further consideration of harm minimisation and anti-money laundering requirements.

Game Play

- **Player** will transfer funds (load credits) from the player account to the EGM at the start of the session and during the session as desired.
 - **Player** PIN will be required to transfer funds to the EGM.
 - Transfer load limits may be imposed for consistency with current casino requirements.
- **Player** commences gaming within the session on the individual EGM.
 - Current jackpot win requirements will remain with credit transfer to involve **venue** staff.
- **Player** ends their session on the EGM.
 - Credits transfer from the EGM to the player account.
 - No cash payouts are allowed.
 - Credits of \$1 000 or more must be paid by **venue** staff in accordance with the Commission's large payment rules (likely to be amended).

Collect Funds

- Player funds remain in the player account until the **player** chooses to collect those funds.
- When a **player** chooses to collect funds from their player card account:
 - **Player** to enter PIN.
 - **Venue** to check ID.
 - credits transfer from the player account and updated balances show on player card;
 - credits of \$1 000 or more must be paid by **venue** staff in accordance with the Commission's large payment rules (likely to be updated).
- Cashless gaming system will reconcile **venue** funds in the background on a regular basis.
 - *For example, assuming funds transfer across venues, if a player has loaded funds or won credits at one venue and then collects funds from another venue, the cashless system will reconcile this and ensure both venues have the correct net funds.*

- *Alternatively, players could be required to load and collect funds at each individual venue.*

Definitions

Funds: *player money held in an account linked to the registered player card. The balance will be money deposited to the account by the player, less money transferred to an EGM, plus any money transferred from the EGM at the end of a gaming session.*

Credits: *refers to the value available for wagering on an EGM. The transfer of money to an EGM creates an equivalent number of credits. Credits are used to place a bet per spin and wins on the EGM increase the number of credits. The credit balance is equivalent to the amount of money transferred to the EGM, less any credits spent on spins, plus any credits won.*

Costs

- The system cost is still under negotiation and will depend on the final design.
- The player card gaming system will require new hardware. The hardware requirements are likely to include:
 - card printer
 - pin pad
 - cashier terminal
 - card reader and display on the EGM (vector).
- It is expected that the cashless gaming system could utilise the same hardware as the PCG system and no further hardware would be required.
- The cost of the hardware may be an upfront cost or an option for lease may be available.
- Once the system is implemented there will be daily ongoing fees payable by venues to the monitoring operator per EGM. The fee will be set by Government in Regulations.

Information collection and storage

- The systems will be implemented to ensure that any personal information and data collected is stored securely by the monitoring operator and cashless gaming provider.
- To establish an account and be issued a player card, **players** will be required to show appropriate photo identification and confirm name, address and date of birth. This will be sighted by **venue** staff, but no copy will be taken and any personal information will not be retained by the venue.
- There will be a requirement for **players** to provide consent for the collection and use of de-identified gaming data by the Commission and for identifiable data to be provided to the Commission on a confidential basis if required for the purposes of investigations.

Next Steps

- The feedback from initial consultation with industry will be considered and included in system design development as appropriate.
- Once a more fully refined design is available and operational requirements have been developed, broader public consultation can occur.
- The outcomes will be used to finalise the design to enable system build to commence.
- Once the system design is confirmed early in 2024, it is likely to take at least nine months to build.
- A progressive rollout is being considered to smooth the implementation process and to ensure venues and players have time to become familiar with the new requirements.
- During the build phase, the Tasmanian Liquor and Gaming Commission will develop detailed regulatory requirements for system operation.
- The Government will introduce Regulations to set the applicable fee for monitoring the new systems.
- A comprehensive training program for venues and players will be developed in conjunction with industry to support the implementation.