Submission to the Inquiry into Gambling Reform – Design and Implementation of a Partial and Full Pre-Commitment Scheme

This submission highlights recent research into cashless and card based gambling in New South Wales. In addition to enabling play without notes or coins, cashless player account systems record player data that can be harnessed for a multitude of purposes. For example, players can enable responsible gambling features such as time and expenditure limits and request records of expenditure. In the venues where this research was conducted the primary and secondary functions of the cards were loyalty program participation and cashless gambling. There was limited knowledge of the responsible gambling features and, consequently, no players had used these features. Despite this, use of cashless player accounts appeared to increase some gambler's awareness of their expenditure, presenting an opportunity to moderate their within-session play.

The mechanisms that support changes in player behaviour are discussed in this submission and, where appropriate, issues related to the proposed partial and full pre-commitment schemes are highlighted. The experience of implementation and adoption of cashless card based technologies in two venues, as described by their employees, is also recounted with an emphasis on factors that could maximise the success of similar schemes. Finally, other design and implementation issues related to the pre-commitment scheme proposed are briefly discussed.

Ease of use and usefulness as determinants of use of cashless player cards

This early, exploratory study analysed the perceived advantages and disadvantages of cashless machine gambling in NSW in order to identify the key factors likely to affect its future provision and acceptance. As the key findings of this study were presented in Submission no. 076 (Centre for Gambling Education & Research 2009) to the Productivity Commission gambling enquiry, and have been referenced in Chapter 10 – Pre-committment strategies (2010) of the final report, they are only briefly reiterated herein.

Advantages for venues included increased security, marketing opportunities, improved customer service, a reduction in overheads through a decreased need for machine maintenance, and the ability to reduce wage costs associated with security and gaming floor staff (Nisbet 2005c). Key advantages for surveyed gaming machine players (n=134) included that the statement of expenditure and personal identification number (PIN) appeared to be useful features, and that the system was perceived as reliable, secure and easy to use (Nisbet 2005a). Reliability, security and ease of use are key determinants of adoption and ongoing, full system usage. Overall, the sample of respondents did not believe that card based gambling would help them mange their spending (Nisbet 2005b).

Cashless and card-based gambling and its influence on player behaviour

This section discusses the findings of the first two stages of a PhD research project, begun at the Centre for Gambling Education & Research at Southern Cross University, that seeks to understand the influence of non-cash gaming machine payment systems on player behaviour. Changes in gambling behaviour that occur as a consequence of player's use of cashless gaming machine cards, and the primary and secondary impacts of that use on players and the venue have been investigated in stage

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one. In the second stage 30 players, comprising mostly card users but with a small number of non users included for comparative purposes, were questioned about their pre- and post card use gambling behaviour or, for non-users, resistance to card use. A proposed quantitative phase, to be completed at the University of Melbourne in 2011-12, will compare key player behaviours pre- and post card use to determine whether cashless cards help players regulate their gambling behaviour. While pre-commitment is not the primary focus of this research, largely due to the voluntary nature of use, it is hoped that the findings, in their broader sense, will serve to illuminate the Senate committee's deliberations. Please also note that, while cards are the delivery mechanism discussed throughout this submission, it is expected that any other device, as discussed by the Productivity Commission (2010), could equally form the basis of a technology based pre-commitment scheme.

The adoption and diffusion of cashless and card-based systems from the organisational perspective

Changes in gambling behaviour that occur as a consequence of player's use of cashless gaming machine cards, and the primary and secondary impacts of that use on players and venues were investigated from the venue perspective. Two goals guided this research. The first was to understand the effect of employees on player's new technology adoption. The second was to explore the dimensions of customer use of cashless cards to provide explanations for variations in usage behaviour that could provide some tentative early theories of player involvement. Thus, a small sample of staff (n=14) from two large venues, each with around 300 machines and 30,000 members, and where card based gambling had been introduced four years earlier were interviewed about the process of recruiting and supporting new cashless card users. They were then asked to describe changes in player behaviour they perceived since the introduction of the system some four years earlier. While the findings of this research are limited by the small sample size and its exploratory nature, they can inform system design and implementation decisions related to similarly large, membership based gaming machine venues.

The diffusion of technologies literature (which often includes observations of the adoption of significant public health initiatives such as contraception, vaccinations etc.), suggests that key persons, or change agents, are critical in encouraging adoption, training users, and following up to ensure continued and full use of the innovation (Rogers 2003). Venue staff, this stage of the study argued, have a crucial role in this regard. Critical skills for staff involved in encouraging adoption and full use of these technologies is that they are able to: recognise and respond to customer needs; reflect on the effect of customer adoption of cashless mechanisms on their role and responsibilities; and have a deep understanding of the consequences of card use for the venue as well as its customers. While most venue staff have highly effective customer service skills, the ability to reflect upon and rationalise use in relation to players and the wider community benefits are higher order communication skills that require an investment in staff training and development. The benefits of such an investment will be effective and responsive staff who readily observe and respond to the needs of gamblers. This could include, but is not limited to, supporting patrons in their decision making around appropriate and effective limit setting, encouraging full system use (e.g. discontinue play once limits have been reached), assisting patrons exhibiting problematic usage behaviours to seek help from counsellors, including exclusion advice and support where appropriate, and reporting unintended and unanticipated consequences of use during trial and evaluation stages. It should not

be assumed, given the proposed voluntary nature of limit setting under both the partial and full pre-commitment systems recommended by the Commission, that the technology, in and of itself, will protect all players, particularly those displaying problematic or risky gambling behaviours. Thus, opportunities for genuine employee participation in the adoption and continued use of the technology should be explored and executed (Nisbet 2009b).

Employees were also asked to articulate perceived changes in within-session player behaviours that have the potential to affect ongoing use of cashless cards (Nisbet 2009a). Of particular interest to this enquiry are those behaviours that card users exhibit that may have a protective function by facilitating responsible play. Participants in this study thought that cashless cards allow players to end a session at a time of their choosing. Removing the card from the machine transfers credits to the player account, which can be collected at the cashier, or retained for play at a later date. Importantly, this allows the player to act on an impulse to end the session without having to wait for a machine attendant. In a study of ticket in – ticket out technologies in similarly large venues with ticket redemption machines it was concluded that the ability to quickly end a session had a potentially protective function (Carter 2006).

Player knowledge, attitudes and practices associated with their use of cashless payment systems

Stage Two of this research describes the player behaviours associated with the use of cashless gambling cards form the perspective of players. In-depth interviews were conducted with 30 Australian cashless player card users (n=26) and non-users (n=4) from two venues. As the results are not yet published, selected findings are summarised below. These should be regarded as context specific and not readily generalisable given the exploratory, qualitative nature of the study.

Participants

Participants ranged in age from 25 to 70 years, and, while largely Anglo, came from a variety of ethnic backgrounds. Players had been members of their venue between 1 and 50 years, with many having 15-30 years membership. More than half of the participants also played gaming machines at other venues with cash. About one third of players indicated that they had been using the cashless component of their membership card since introduced to their venue, four years previous. Most other users had been using the card for up to two years. Four respondents played only with cash where cashless was available; several were familiar with ticket out technologies. 21 participants were female and 9 male. All respondents were frequent visitors to the venue and frequent gamblers, visiting the venue at least once and up to four times per week. Most participants were asked to rate themselves as 'light, moderate or frequent' gamblers; a few admitted to having a gambling problem or to having had difficulties controlling their gambling in the past, while others were clear that they are 'not a bloody addict gambler' or 'not a huge gambler', and they could mostly afford to spend what they did, even though sometimes they did spend more than intended. Gaming venue staff helped recruit participants from the gaming floor on interview days, no interviews were conducted after 7 pm, and participants were compensated for their time with a $10 meal voucher for redemption in each venue's restaurant or cafe.

Money-In

Players were asked to describe and discuss their attitudes and actions related to putting money into the machine at the commencement of and during play.

Loading money onto the card

Cashless play is not, contrary to expectation, a gaming experience exclusive of cash. Many players variously bring cash with them to the venue, use ATMs to withdraw cash for further play, and will use this cash to add value to the card ('top up') at commencement or during their session of play. Thus, the player experience with cash is individual and unique to their circumstances. Mostly, cashless players only load money onto the card when the balance falls below $5.

Transferring money to the machine

Players were asked to describe how they subsequently transferred money from the card to the machine, and how they decided when, and in what amounts, to do so. The system allowed players to download money in either $1 or $10 increments, and most users said they would transfer small amounts, such as $5 or $10, down to the machine at a time.

Machine choice

Participants concurred that the card was not a factor in their choice of machine. 'If you want to play a machine then you want to play a machine and if it's not going to take your card then ...' players would elect to play with cash. This was uncommon, as almost all machines in both venues had been retrofitted for carded play at the time of the interviews.

Stake size

Although many participants described how they vary the number of lines played on any machine during a typical session to either maximise the time spent in play or to increase their enjoyment, there was broad agreement that the card made no difference to this aspect of their play compared to non-cashless play.

Machines played

Card users commented enthusiastically the extent to which the card facilitates movement between machines. Therefore, players are more likely to do so, with several saying it 'does make a difference' and they 'definitely find that ... you move around more when you've got the cashless card.' Perhaps because players recognised and were able to strongly articulate this key advantage of card use, they also readily offered reasons for their movement between machines. These broadly related to the the level enjoyment, Whether this movement leads to play on more machines per session than non-cashless card users, and whether that play leads to greater expenditure remains unknown.

Breaks in play

It is commonly reported in the literature that cashless player cards facilitate breaks in play, and it was thus expected that participants would indicate this in the interviews. About one-fifth of players 'don't think the card makes a difference' to the time and length of breaks taken. Several players described how the card facilitates short periods away from the machines, although an underlying concern

remained the security of their credits and card, as they would leave the card in the machine as a way of 'reserving' it for further play. Others were more circumspect, and indicated that they take fewer breaks in play – if any at all – when playing with the card, although it remains unclear if this is a consequence of card use or simply characteristic of their individual play. Since these interviews new technology has been deployed at these venues that allows carded players to reserve the machine and safeguard their credits for a period of time so they can take a break away from the machine. It has been well received, suggesting that allowing players who select limits to access a secure break system could increase its appeal, notwithstanding the need to keep the user interface and functionality simple and easy to use.

Change in expenditure

The majority of participants did not perceive a difference in their expenditure as a consequence of using cashless, compared to their non-cashless play. 'It is not the card that determines that' said these players, nominating more influential factors as 'the amount of time and [amount of money] I want to spend', or 'what I bring to the club.' A few participants said they 'don't put as much money in' when playing with cashless. For these players, card use makes it easier for them to track, and therefore limit, their expenditure: 'its money saving for people who use it the right way.' However, a former problem gambler, asked if his use of the card helped him reduce his expenditure at that time said 'not really, at that stage I didn't care.' This is consistent with the notion that cashless, carded play would have marginal, if any, benefits for at risk and problem gamblers.

A similar proportion of players to those who spoke of controlled expenditure thought it 'more tempting to spend more, its more tempting to spend what you win.' These players thought it 'easier' to spend more when playing with the card, as 'you see an amount on there and you just keep pressing it and putting money in.' Likewise, another player said 'we spend our money faster sometimes with the cashless card', as a consequence of not having to 'wait for someone to come and attend to you and then go to the cashier.' Despite this ease of expenditure, these players did not perceive an increase in their expenditure, saying they would still 'spend the same amount of money…' Only one participant said she spends more when playing with the card, 'because you're not [taking breaks to go] to the money thing [ATM].'

In relating their reason for resisting card use, cash based players also commented about the perceived impact on their play in relation to expenditure. One player thought it would help her manage her gambling money, by reducing the oft-reported tendency to play a win back to an 'even' or 'round' number while waiting for a machine attendant. Curiously, this was not enough to encourage this player to adopt the card.

Budgeting

While many players did not perceive a difference in their overall expenditure compared to cash based play, as above, it was nonetheless of interest to consider whether the card supported them to stick to a budget or pre-determined expenditure limit. Thus, players were asked if they set a gambling budget, what determined its size, and whether the card helped them stick to their budget relative to cash based play. Reasons why players would exceed any pre-determined expenditure limit were also explored. Note that these limits were 'psychological', rather than technological, limits.

Equal numbers of players said they budgeted as said they did not, with several budgeters claiming to stick to their limit. Most others were ambiguous about whether they set, and stuck to, expenditure limits. Several players gave examples of the circumstances in which they would exceed their expected spend. These players would conceptualise an upper expenditure limit that might equal the balance on the card, but were prepared to access additional cash – from their wallet, shirt pocket or the ATM - to exceed that. One male participant said he would move on to sports betting with cash he bought to the venue if he used up the balance on his card while gaming. Similar behaviour could be expected from some players who have nominated input limits under the proposed partial and potentially under the full pre-commitment schemes; appropriate monitoring and analysis of these player behaviours should take place during the transition period.

Balance awareness

Players were asked if they were aware of the balance on their card, how they knew, and what effect this knowledge had on their consequent play. As described above, many players said cashless made them 'more aware of how much you are spending.' Most of these players are 'normally' 'always aware of what the balance is on my card' and 'aware [of my net position] all the time ... I'm aware how much I've got and how much I've spent and how much I have in my pocket.' For many players this knowledge was a consequence of the card reader display, which momentarily shows the dollar balance when the card is inserted. This gives the player additional, useful information with which to evaluate and potentially moderate their play. Similarly, a few participants intuit their net balance based on money in, credits available and money out. A few players did not know, and claimed to not want to know, how much they are spending.

The effect of this knowledge on player behaviour was variable. Knowing the balance on the card reassures some respondents, helping them keep track of money being spent. One player suggested that any money saving effects are moderated by the ease of use of the card, while another player claimed not to moderate play according to the card balance, but takes note 'only to see if there is anything leftover from the night before.'

Money-out

These behaviours broadly relate to the methods players use to redeem value from their player account.

Session length/ending session

The reasons why players in this study end a session mostly echo those in the literature (Wohl, Lyon, Donnelly, Young, Matheson and Anisman 2008), and therefore initially appear to be independent of card use. Many players said their session length was self-determined yet independent of time or money. Others admitted to ending a session when they have exceeded the amount they intended to spend, mostly by 'running out' of money. This is consistent with other evidence including the staff interviews discussed above, suggesting that several aspects of cashless carded play can increase the rate at which money can be lost and perhaps brings a session to an end earlier that anticipated. Time limits, therefore, are a potentially ineffective pre-commitment tool, the consequences of which could be to frustrate players who are encouraged to set these limits. Full and further research in the trail phase is recommended.

Cashing out

All card users spoke positively of the convenience of being able to choose when, and how much, to cash out. However, visits to the cashier during a session were, for most cashless players, undesirable and infrequent. Players that seek assistance from a cashier during their session did so 'only if I want to change the money' or to 'take my winnings if it's a big one.' Two other players spoke of how their visits to the cashier were determined by turnover and the effect of the balance limit.

Role of the balance limit

In NSW, the Office of Liquor, Gaming and Racing (2009) standard maximum amount for player account-based cashless transfers is $200, although venues may apply to increase that limit (2009). Most players are unaware that this is the case and there are therefore several unintended, though possibly positive, consequences of having a balance limit on the card.

One sixth of players discussed the balance limit, describing how the $200 ceiling was appropriate to their needs, or conversely, how they had the balance limit increased. Most other players had no working knowledge of the limit, presumably having never needed to load more than that amount on to the card as cash or winnings. Asked if there were benefits associated with maintaining the $200 default limit, one participant noted that it precipitated a visit to the cashier. This participant seems not discontent to have this behaviour triggered: it is probable that this is an example of a 'stop and think' measure that has the potential to bound expenditure and time spent in play, independent of any other limits that might be set.

A small number of players do, however, see the limit as disadvantageous, particularly given that cashless players regularly nominate not having to wait for a cashier as an advantage of use and dislike receiving (and having to bank) cheques. A 'personalised' balance limit can add enjoyment, reduce annoyance or, if reduced below $200, set an apparent ceiling on expenditure, as one player had done. Changing the limit is easily achieved by a visit to the cashier, although most players mimic common consumer behaviour and accept the default limit. As noted by the Productivity Commission (2010), this likely to be the case under full pre-commitment, reinforcing the suggestion that strategies to encourage considered limit setting be trialled and evaluated through implementation.

One player who admitted to a previous gambling problem while playing with the card described increasing the limit and indicated that, upon reflection, this behaviour was irrational. Having a high balance limit does however, have utility for a number of players, several of who spoke of their $1000 balance. These include being able to leave winnings on the card so that when you come back 'you don't have to go to your wallet and use your own money', not 'ending up with bloody cheques sitting in my wallet', and increased security as compared to cash. Notwithstanding these benefits, and the oft-stated position of the Productivity Commission (2010) of respecting consumer decision making, higher barriers to increasing account balance limits, consistent with those suggested for opting out of technological pre-commitments, should be instigated.

Balance left on the card

Player attitudes and actions related to leaving a monetary balance on the card at the end of a session, before leaving the venue, are explored in this section. Two industry experts discussed this with the researcher in some detail. The first, a manager who had recently introduced cashless cards

said most players at that venue are leaving a balance on the card, a 'cunning kit' hidden from their significant other, which gives the player funds for their next session. It is this behaviour that most concerned the policy maker; the maximum value was also hoped to limit this behaviour.

Players fell into two distinct groups when it came to collecting any balance on their card when preparing to leave the venue. Those in the first group would collect all their winnings or any remaining balance at the cashier, perhaps leaving a small, odd amount for the next session. Players in the second but much smaller group would leave large balances on their card for use next time they visited the venue. Some players from both groups would also cash out during their session if they received a win, as discussed previously. Many players admitted that it is unusual to have a balance to cash out. Where a balance does exist, players will 'sometimes leave some money there so that when I come in next time I am ready to play. But most of the time I take it all out.' Clear personal guidelines existed for many players related to how much they would leave on the card; many players nominated amounts below twenty dollars. The other group of players spoke of leaving larger cash balances, in excess of $100. For all these players leaving a balance on the card, large or small, ensured that there was money available 'so that I have something to start off with next time I am in.'

Another player said the frequency with which she gambled, and her lack of need for cash, was the reason why she never cashed the balance out. Again, these behaviours seemed to be be deployed according to personal circumstance and the individual's self perceived notion of control.

Privacy issues

Interestingly, the privacy issues that had featured prominently in earlier research and continue to be consistently referenced in the literature (Parke, Rigby and Parke 2008; Productivity Commission 2010) were no longer barriers to card adoption for this sample but, for the majority of players, were advantages of use. As observed by one gaming manager, card users 'don't care' about back of house anonymity or privacy, but instead want anonymity from other players (and sometimes partners) when they have a win and when putting money into a machine. Several players described behaviours that would achieve this, such as reducing the number of credits displayed on the machine 'to keep it private'. While the cashless player card had a large role to play in this respect, some players would also, on occasion, use the collect button to receive coin or a ticket, or request a hand pay from an attendant. These complex strategies were used to foil parties who might be second guessing their account balance or win rate.

Meaning and management of money

The question of whether card users differently perceive and consequently manage their money was also framed for inclusion in this study. This is relevant to developing our understanding of pre-commitment behaviours generally. Most players asked to reflect on this question said there was no change in the way they perceived their money as a consequence of card use. However, an analysis of the behaviour described during the interviews suggests greater complexity in their attitudes.

The language used by participants provides some initial insight – for example, many spoke of the money on their card as being their 'gambling money' or of not having to 'go to your wallet and use your own money'. Additionally, several players dedicated most of their winnings to future gambling. While not a behaviour exclusive to cashless players, many of these participants did differentiate

between ‘the money we came with’ and any winnings, regarding these as money you ‘can play with.’ For example, ‘if it's my own cash I will play some’ said one player, adding ‘but if its cash that I have won, I will put some back in again.’ In the same way, many players also spoke of cash, held in a wallet or purse, as their ‘own’ money as distinct from money held on the card. There are several examples of this in earlier parts of this submission. Some of these players won’t - or will try not to -play with money in their purse or wallet, and might regularly draw down any winnings and place there for safe guarding. They perceive cash in a wallet as more inaccessible than the stored value on their card. Player perceptions of gambling money, then, seems to be shaped by a complex set of values, attitudes and play behaviours.

A quantitative confirmation of carded play

A third stage will conclude the research for this PhD examining cashless and card based gambling and its influence on player behaviour. This will be completed at the University of Melbourne in 2011-12. It is proposed to use player tracking data to compare key player behaviours pre- and post registration to use the cashless component of the card. This research will help determine, using a large sample of players, whether cashless card use is helping players regulate their gambling behaviour. The nature and extent of player’s use of four features - player transaction statements, expenditure limits, time limits and time based exclusion – will also be described. Ideally, up to 24 months of data will facilitate the effective evaluation of changes in usage over the study period, which should run for at least 12 months to ensure that discontinuance of use, the behaviour of late adopters, and any unintended or unanticipated consequences that may develop are considered.

A key limitation of this project is that non-loyalty card user data will not be evaluated unless they sign up to use the card, although the rate of new registrations will provide valuable additional data. This approach also assumes that the likely impacts of changes have been thoroughly considered through a review of the literature and evidence from other jurisdictions that have adopted similar policies, where appropriate. Ethics approval will be obtained from the University of Melbourne. This research will be published, and should provide evidence to inform the ongoing design of cashless card based (or other device based) gambling and the use of associated responsible gambling features.

Design, research and implementation issues

Several other issues for the Parliamentary Joint Select committee to consider, related to system design and implementation include:

- **Low rates of voluntary adoption and use.** As reported in relation to the recent Queensland trials of similar, voluntary-to-use card based systems (Productivity Commission 2010), the cashless functionality at the New South Wales study venues was well received by those who trial then adopt the system but, overall, very few players – less than 5% of registered club members – did so. Notably, the users in these studies represented a much larger proportion of each venue's gambling turnover, were frequent gamblers, were specifically targeted during the adoption campaigns run at each venue on this basis, had a long association with the venue, and were existing loyalty card holders. This combination of factors meant that cashless player accounts were especially attractive to these players; many gamblers do not

share these characteristics. Further research investigating the barriers to adoption amongst players who are resistant to use is required to ensure that the widest possible number of gamblers will trial then use the system as intended. Adoption campaigns can be designed based these findings.

- **Target audience**. While all gamblers are, as above, the target of the full pre-commitment scheme, it is likely that the degree of adoption and use will differ amongst groups of players. The intended consequences of adoption for each group should, therefore, be carefully mapped early in the design, with a view to ensuring that the advantages and disadvantages of use are equitable. For example, there is no evidence to suggest that problem gamblers will be rehabilitated by participation in a pre- commitment scheme such as that described. In all likelihood many of these gamblers will not set reasonable limits, will seek out ways to circumvent any restrictions, probably in ways we cannot anticipate, or will switch to other forms of gambling. Some at-risk gamblers could benefit from participation by gaining increased awareness of their expenditure and other risky within-session behaviours and appropriately moderate these, perhaps with targeted interventions from staff and referrals to counsellors. Recreational gamblers will, with a well designed system, enjoy the freedoms associated with full system use and be able to maintain their play at desirable levels indefinitely. Use and non-use alike should be monitored and assessed.

- **Stakeholder participation.** Counselling and treatment service providers and gambling venues and their staff are key users of the system. They should be intimately involved in its design and be afforded opportunities to provide feedback throughout the trial and implementation phases. These users will recruit players, encourage full and considered use and potentially, could intervene where at risk or problematic play is suspected.

- **Exclusion.** Cards are, conceivably, an effective way to exclude gamblers from venues, as the study *Assisting Gamblers in South Australian Gambling Venues* found (Hing, Nisbet and Nuske 2009). The evidence from South Australia where manual, multi-venue barring orders are used to reasonable effect, is that a card based solution would increase player privacy, increase the number of gamblers who use the system, and will also solve the problems around monitoring breaches (Hing, Nisbet and Nuske 2009). Notwithstanding this, exclusion is only one option available to gamblers to address their gambling problems. Its effectiveness is determined by a host of factors related to the seriousness of the patron and the goal of exclusion: some patrons only want to control their gambling for a short period of time; some want to reduce their expenditure or time spent gambling but do not want to stop; some need a quick fix for uncontrolled gambling; while others seek a long term solution. Exclusion options available to gamblers under the proposed pre-commitment system will likely address the needs of players with these first few goals. However, gamblers experiencing significant harm as a consequence of their gambling, and who seek a long term solution, are likely to find that their underlying issues remain unaddressed and further interventions will be necessary.

- **Data use.** A vast amount of data relating to their pre-commitment choices and subsequent gambling behaviour will be generated by players participating in the scheme. This should be de-identified and made available to researchers where it can be demonstrated that the

research will further understanding of the effect of pre-commitment on player behaviour. Assuming the privacy issues can be appropriately addressed this data could also be used to extend the functionality of the system without adversely impacting the usage experience of the majority of players. For example, when a player excludes for a period greater than 24 hours, a voucher could be printed with a referral to a counselling service near to the gambler's home in addition to a 24 hour telephone helpline. This simple, tailored intervention could be a way of increasing the number of gamblers seeking help for their behaviour, although close monitoring of the response of gamblers during the trial phase would be required. More controversially, where players are displaying behaviours consistent with problematic or at-risk gambling, trained venue staff could be permitted to review selected data on the basis of a possible intervention. This is a technique used by Host Responsibility Co-ordinators at SkyCity casino in Adelaide, which significantly increases their ability to co-operatively and sensitively manage player interventions (Hing *et al.* 2009).

- **Interoperability.** Cross border issues should also be considered in the design. From the evidence presented by the Productivity Commission (2010) it appears that each jurisdiction will operate their pre-commitment system independently of each other. While there are undoubtedly compelling technological reasons for this, it could lead small numbers of 'committed' gamblers to circumvent limits set, then met, in one jurisdiction to travel to another, as some excluded South Australian gamblers are known to do (Hing, Nisbet and Nuske 2009). For maximum effect the full system should be universal with data shared between jurisdictions.

- **Marketing and advertising.** Differences in the marketing and advertising of gaming between jurisdictions such as New South Wales, where there are many restrictions, compared to Queensland, which has a more liberal regulatory approach, should be thoroughly reviewed to ensure that further inequity is not achieved through the design and implementation of the full pre-commitment scheme.

- **Unanticipated consequences.** Evidence from the implementation of the smoking ban legislation in New South Wales suggests that venues and the industry interpret gambling regulations and requirements in novel and unanticipated ways. Venues in this State introduced outdoor gambling areas that, while subsequently accepted by the regulators, undermined the spirit and intentions of the original ban. Attempts should be made to predict the unintended consequences of a full pre-commitment system by working co-operatively toward a universal solution with a cross section of gambling industry stakeholders.

Conclusion

The possibility that new gambling technologies such as cards might be of assistance in meeting public health goals has only recently begun to be explored. The original research highlighted in this submission has been undertaken in several stages over the last five years in New South Wales, Australia. Consistent with the findings of other jurisdictions, these new technologies are perceived as easy to use. Players in the New South Wales studies did not believe that cashless card use impacted on key aspects of their play including individual expenditure, machine choice, session length, or

breaks in play relative to non-cashless card use, although several respondents spoke compellingly about the card's influence on their ability to manage their gambling money. The card reader attached to each gaming machine displays the dollar balance when the card is inserted or a player account-to-machine transfer is made. This appears influential in this respect although further research is required.

While the technologically based pre-commitment system appears to have wide, though conditional, support from a range of gambling industry stakeholders, the final solution will require significant financial investment by many, although not all, gaming machine operators and this will also require building and sustaining good will among all stakeholders. A well designed, simple user interface and targeted monitoring of the impacts of use in the partial and full implementation phases will ensure that this system meets the needs of many stakeholders.

Finally, it would be naive to assume that the moderate levels of adoption and use likely to be achieved under the jurisdictionally based scheme proposed in Australia will provide adequate levels of protection to at risk and problem gamblers. Preliminary evidence from Nova Scotia, Canada confirms a probable negative revenue impact, although the extent of such in the Australian context and the group of gamblers who reduce their exenditure remains unclear. Consequently, gambling counselling and treatment providers should be co-opted in at the design and implementation stages. Venue staff should be appropriately trained in the use of pre-commitment technologies, encouraged to report unintended and unanticipated use, and empowered, via participation in well designed training programs, to continue to interact with gamblers and respond to suspected problematic gambling behaviours in appropriate ways.

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