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Department of Treasury and Finance

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Thank you for the opportunity to make a submission regarding the implementation of card-based gaming for electronic gaming machines (EGMs) in Tasmania. I have been conducting research on gambling harm prevention since 2004, wrote a paper on the harm minimisation benefits of account-based gaming for EGMs in 2011, and have been actively researching account-based gaming for EGMs since 2019.

I strongly recommend stakeholders, including individuals with lived experience of gambling, are consulted throughout any consideration of implementing account-based gambling. I highly recommend methodologically rigorous trials and evaluations are conducted to inform the feasibility and acceptance and implementation of account-based gambling and incorporated harm minimisation tools and resources.

Summary:

- Registration
    - Account-based gaming should be mandated for EGM use with no exceptions. All accounts should have similar restrictions to avoid card-swapping.
    - To register an account, individuals should have to verify their identity. Registration should be supported to make use of the system easy and accessible.
- Harm-mimimisation
    - Mandatory default limits should be in place for all accounts.
    - Decreases should be easy to set and be implemented immediately.
    - Users should have to verify that they can afford their intended level of expenditure if they increase their limits and increases should require a delay.
    - Users should be able to set their own time-limits.
    - Breaks in play are recommended, however, research including work with consumers, is needed to identify the most appropriate timing and length of breaks in play.
    - All users should be regularly sent a clear summary depicting their lifetime net result, spend, win, and losses.
- Loyalty programs
    - Account-based gambling can be linked with loyalty programs, however, caution is needed to avoid incentivising gambling spend beyond intended amounts.
- Data
    - De-identified data should be made available for research and evaluation purposes.
    - Systems should be identified to monitor and track all gambling in real-time to identify potentially risky gambling behaviours. Interventions can be sent

automatically to players and venue staff can be notified to enable a direct interaction to check-in with customers.

- Funds
    - Customers should be able to use cash and kiosks and not be required to link their bank accounts to their gambling accounts.
    - Systems must be designed to reduce the risk that digital funds transfers will increase the risk of customers spending more than they intend. This may includer repeated verification and delays on deposits from bank accounts.
    - Customers should be able to quarantine specified funds to prevent these being regambled.
    - It should be easier to withdraw funds from accounts than to deposit these. Customers should be encouraged to make regular withdrawals from their gambling accounts.
    - Customers should be able to transfer money from their gambling accounts to their bank account rather than having to withdraw cash.
- Accounts should support a state-wide self-exclusion system.

Account-based gaming

I strongly support the implementation of mandatory account-based gambling including for EGMs. Registered card-based gaming would be considered a form of account-based gambling. I will use the term account-based gambling throughout this submission in recognition of the potential for a system to use a digital card or app in addition to a physical card. However, I note that appropriate terminology is essential to develop with consumers to ensure positive attitudes towards the system. A clear label that is consumer-friendly is important to encourage uptake, destigmatise use, and position the system as intending to benefit all EGM customers.

Registration

I am not supportive of a system allowing unregistered cards to be used for EGMs as this defeats any benefits of the card and will likely be used by individuals who stand to benefit most from an account-based system. I recognise that casual play is an important part of EGM gaming and there is time and effort involved with registration to establish a player account and obtain a physical or digital card. However, given the substantial risks involved with EGM play and the increased ease and speed of verifying identity using online documents, systems, and technology, and the ability for venue staff to assist customers, this is not an unreasonable burden for customers.

I similarly do not recommend having different accounts for non-Tasmanian residents. It is understandable that genuine short-term visitors may not want to go through the same required steps to register as Tasmanian residents. However, it is likely that there are many people who reside in Tasmania who have identity documents from other jurisdictions which would enable them to bypass the intended systems. There is also a high risk of a black marker of registered non-Tasmanian resident cards becoming available or people obtaining non-resident cards through social contacts.

I recommend efforts are made to harmonise account-based gambling across state borders.

To register for and establish an account, individuals should be required to verify their identity using standard 100-point ID checks. This should be able to be completed complete remotely

using electronic systems, or in-venue with trained staff able to verify identify documents physically provided. Customers will require an email address and likely mobile phone number to register, however, can be provided with a physical and/or digital card to reduce barriers related to technology literacy and use. Individuals should be able to access their account information remotely via a website or application using their log-in details, or via kiosks in venues. In addition to PINS, additional security would include biometric recognition such as facial recognition technology. This would enhance account security and reduce the ability for customers to share accounts.

Efforts will be needed to design the system in a manner that is easy to use, including for people who have low technological literacy, are unbanked, and do not have access to smartphones to ensure equity. In a test of the variables which predicted intent to use an account-based system, ease-of-use was a significant predictor among a sample of regular EGM customers[1]. No significant differences were seen between customers based on whether they used smartphones or online banking in terms of intent to use the system, but those who used digital wallets to make payments were significantly more likely to use the account-based system than those who did not[2]. These findings indicate that there are technological barriers in terms of capability and attitudes that would need to be overcome to assist customers to engage with an account-based system. Qualitative responses indicated that the willingness to register for and use the system would need not only technical support, but to overcome concerns about digital banking including privacy concerns. As such, the implementation plan to enable registration will need to be carefully considered.

Harm-minimisation

Any harm-minimisation functions should be referred to with consumer-friendly terms which highlight their intention to enhance informed choice and customer control over their own gambling. Terms related to 'help', 'problems', 'harms' or other connotations implying judgment or negative attitude towards behaviours should be avoided as such terms may result in many customers not viewing the tools as relevant to themselves. It is essential that these functions are implemented in a manner that positions them as relevant and useful for all customers.

Relatedly, it is recommended that harm-minimisation tools be positioned as general account tools and not associated with risk or problematic gambling. Using terms such as 'budgets' instead of limits and 'pauses' instead of breaks are more consumer-friendly and place the focus on the features as relevant for all consumers and part of regular EGM play. Language should encourage a focus on consumers being put in control of their own play and data rather than constraints being placed on consumers.

Limits

The benefits from account-based gambling are derived from the harm-minimisation features incorporated into these[3]. When establishing an account, individuals should be prompted to set a limit for how much money they want to be able to spend per day/month/year with a default

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[1] Lockwood, M., Santos, R., Chandrakumar, D., & Gainsbury, S.M. (2024). Understanding consumer perceptions and sub-group differences in intent-to-use account-based ("cashless") gambling systems. Manuscript in preparation.

[2] Gainsbury, S., Santos, T., Heirene, R., Chandrakumar, D. (2024). *Account-based gambling. Insights from a large EGM Venue in Western Sydney.* Gambling Treatment and Research Clinic, University of Sydney.

[3] For a summary of harm-minimisation recommendations see Gainsbury, S. M., & Blaszczynski, A. (2020). Digital gambling payment methods: Harm minimization policy considerations. *Gaming Law Review.* https://doi.org/10.1089/glr2.2020.0015

limit applied otherwise, which they can increase or decrease. Spend limits (also known as loss limits) are more relevant for EGMs than deposit limits as EGMs are designed so that any wins received are automatically added to credits on machines. This results in customers often spending more than they intended as they do not fully appreciate wins and tend to re-gamble these.

Experimental research examining EGM consumer preferences for account-based systems found a preference for a mandatory spend limit, although consumers preferred to set the limit themselves[4]. Half of the regular EGM consumers surveyed reported the ability to set limits as an advantage of the system, which was confirmed in interviews indicating players were generally positive towards these[5]. Similarly, a previous qualitative study of EGM players found that most saw limits as beneficial either for themselves, or for others[6].

Default loss limits are highly recommended as these are an important anchor for all EGM customers for what a typical amount to spend on EGMs is. This is important as it is difficult for customers to assess what other players typically spend reducing in a lack of social norms and expectation to guide what would be appropriate and sustainable gambling behaviours. What any individual can afford to spend on gambling is related to their own unique situation and disposable income, which is highly varied. Nonetheless, EGMs are a risky product, and many people spend much more than they can afford. Defaults set an important precedent by clarifying that EGMs are intended as an entertainment activity and not intended as a major source of spend.

The variability in what would be considered affordable for EGM customers is why the amount spent has never been used as a risk indicator of problematic gambling. Nonetheless, lower-risk guidelines have been recently produced based on analysis of prevalence studies internationally and within Australia[7]. These suggest that people should spend no more than two per cent of take-home pay on gambling, indicating again that affordable spend is relative to discretionary expenditure. As these are based on self-reported spend levels, further research is needed using objective data in relation to markers of affordability and gambling harms to identify appropriate limits for EGM spend per day, month, or year. Nonetheless, customers should be provided with recommended benchmarks and tools to assist them in identifying what is affordable for them to spend and encouraged to set their own limits and be able to reduce these immediately.

Customers should be able to easily decrease their limits, with these applied immediately. Processes could be developed to enable customers to increase their limits after verifying the affordability of this. Any increase in limits should follow a delay that is appropriate to the previous limit in place. Any increase to limits would have to be reviewed regularly to ensure that this is still affordable for customers. Individuals experiencing gambling harms are likely to want to increase their spend limits. As such, any process to enable spend beyond default levels should be quite stringent to ensure that the spend is affordable and not resulting in harm for individuals or those around them such as failure to make child support payments or spending money in joint accounts without knowledge of the other party. Checks should also consider risks related to money laundering and criminal activity, including financial abuse. Ideally,

[4] Swanton, T.B., Garbarino, E., Collard, S.B., & Gainsbury, S.M. (under review) Preferences for cashless gambling payment systems with integrated harm reduction measures among electronic gaming machine gamblers: A discrete choice experiment.
[5] Gainsbury, S., Santos, T., Heirene, R., Chandrakumar, D. (2024). *Account-based gambling. Insights from a large EGM Venue in Western Sydney.* Gambling Treatment and Research Clinic, University of Sydney.
[6] Swanton, T.B., Tsang, S., Collard, S.B., Garbarino, E., Gainsbury, S. M. (2023). Cashless gambling: Qualitative analysis of consumer perspectives regarding the harm minimisation potential of digital payment systems for electronic gaming machines. *Psychology of Addictive Behaviors*. https://doi.org/10.1037/adb0000962
[7] Dowling, N. A., Greenwood, C. J., Merkouris, S. S., Youssef, G. J., Browne, M., Rockloff, M., & Myers, P. (2021). The identification of Australian low-risk gambling limits: A comparison of gambling-related harm measures. *Journal of Behavioral Addictions*, *10*(1), 21-34. https://doi.org/10.1556/2006.2021.00012

objective data should be used to determine affordability such as credit checks which search for any loans including payday loans and markers of financial vulnerability such as missing payments. Before people apply to increase their limits they should be required to interact with tools to help them review their own financial wellbeing and consider the costs of their current gambling including in comparison to other savings goals, necessary or lifestyle expenses.

Time limits

In addition to spend limits, customers should be able to opt to set a time limit. Individuals often spend more time playing EGMs than they intended, however, there has been minimal interest in time limits among EGM customers[8]. As such, efforts will likely be needed to highlight the benefits of using these limits for individuals. In addition to time limits, individuals may be able to set a notification for themselves alerting them after a certain time per session, which may be more useful than an overall time limit per day/week/month. Ideally, individuals would be able to specify account-based parameters such as being able to lock their accounts at specific times such as 12-10am or during hours when they have other responsibilities or activities that they find themselves neglecting.

Breaks in play

Mandatory breaks in play are supported as EGMs have no natural breaks in play and it is common for individuals who are experiencing gambling problems to report that they spend more time and money than they intended. However, there is insufficient quality research and data to indicate when a break in play is optimal for customers, how frequently these should occur, the required length of time for the break and what consumers should ideally do during these breaks. Caution is needed as most consumers are not supportive of time limits as time is not seen as a highly relevant factor in relation to the experience of gambling harms. Furthermore, time spent gambling may be related to session-factors, such as whether an individual is winning. There is likely to be strong psychological resistance to imposed breaks in play which need to be carefully considered. Consumers are likely to modify their behaviours to policies on breaks in play in an effort to avoid these, meaning these may need to be somewhat dynamic. Consultation with consumers is highly recommended to inform any design of systematic breaks in play.

From a psychological perspective, the aim of a break is to allow an individual to detach from the gambling session and break any cognitive or emotional state whereby they are not thinking rationally about their gambling and as such as not making informed decisions about each bet. Consequentially, a break will be more effective if an individual is required to move away from the gaming floor and gaming stimuli. Physical exercise can assist in changing emotional states. Individuals who are fatigued, hungry and thirsty are likely to have impaired decision making so individuals should be encouraged to refresh and address any biological needs with adequate facilities available for this. Ideally consumers would have a social interaction and/or engage in a non-gambling task or activity which requires effortful concentration to change their mindset. This may include venues providing a separate room with games, puzzles, mental and or physical activities including those with social components.

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[8] Blaszczynski, A., Gainsbury, S., & Karlov, L. (2014). Blue Gum gaming machine: An evaluation of responsible gambling features. *Journal of Gambling Studies*, *30*, 697-712. https://doi.org/10.1007/s10899-013-9378-5

Nonetheless, breaks in play can be very helpful for customers, particularly those experiencing gambling-related harms. A report by Focal Research[9] of an evaluation of player monitoring and staff interventions across six casinos in the UK found that as the number of staff interactions increased, at-risk customers were more likely to stop playing when in a loss session, resulting in a reduction in monthly play hours. The analysis indicated that later interactions were more impactful than earlier interactions, suggesting that early interactions are helpful as they help customers to initially think about their gambling and the cumulative effect of interventions over time is helpful for customers to reassess and adjust their gambling behaviours. Cumulative impacts are only possible if breaks and/or interactions occur sufficiently regularly that they are experienced by at-risk players. Research is recommended to investigate the appropriate timing of breaks and evaluate the impact of these on EGM play across consumer subgroups.

Activity statements

Each time customers log-in to use the system to deposit funds and play EGMs, customers should be automatically shown their account activity in a summarised format including lifetime net result, spend, wins, and losses in addition to recent periods such as the past six months. This information should also be automatically sent to all active customers each month via their preferred method of contact. Information should be formatted to enhance understanding using text and graphics to make trends over time clear. It is recommended that these be formatted in a similar design to mandated activity statements from the National Consumer Protection Framework[10] to allow customers to easily amalgamate gambling spend across activities and as this statement is based on empirical research. Customers should be able to access information about their spend through their accounts in real-time and download and export this data in a variety of formats (e.g., pdf, excel, .csv) to enable it to be analysed and displayed through third-party systems.

Recent and preliminary research conducted by the University of Sydney Gambling Treatment and Research Clinic found that EGM customers tend to underestimate their wins by 86%. As shown in Figure 1, EGM customers tended to self-report wins lower than they actually experienced in the last-30 days. In general, customers are very poor at estimating their net outcome, essentially only being able to do this if they have not gambled at all during the period in question. Only 7.8% of customers accurately recalled their past 30-day net outcome, 10.5% recalled wins, and 2.6% accurately recalled total spend, allowing for a 10% margin of error. The findings suggest that the structural design of EGMs may prevent customers' understanding the cost of play and changes are needed to enable informed choice. This provides a strong rationale for activity statements to assist customers to track their spend on EGMs.

[9] Focal Research Consultants Ltd. (2021). *Helping UK Casino Players Gamble Responsibly: Evaluating the impact of safer gambling customer interactions. Final Technical Report.* Focal Research.
[10] https://www.dss.gov.au/communities-and-vulnerable-people-programs-services-gambling-information-for-online-wagering-providers/activity-statements
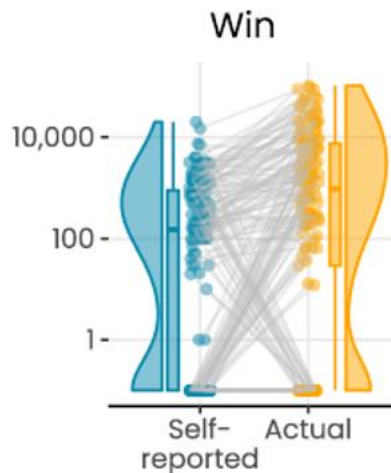
Figure 1 Raincloud plot comparing self-reported and actual value for spend for EGM customers. Preliminary research from the Gambling Treatment and Research Clinic, University of Sydney

There is minimal research on the impact of activity statements. A survey of regular EGM customers found that the ability to track gambling spend was perceived as advantageous by 51% of respondents, the highest ranked benefit of proposed account-based systems[11]. A survey of 1647 Australian online wagering customers found that most consumers (57%) opened the activity statements sent to them automatically and of these, 18% decreased their gambling as a result, which was more common among customers who reported experiencing gambling problems[12]. There were no clear behavioural indicators of change in terms of deposits and betting around the times when activity statements were delivered, suggesting that the impact of statements are on cognitions and attitudes or gradual behavioural change. Importantly, there were no increased in gambling seen as a result of statements and minimal evidence of negative unintended consequences such as consumers chasing losses. Research is needed to investigate the impact of activity statements on EGM customers and their behaviour.

Loyalty programs

If account-based gambling is linked with membership or loyalty schemes which provide benefits from gambling, careful consideration is required to ensure that these do not incentivise gambling. Customers should receive equivalent benefits from spend across the venue (i.e., food, beverage, entertainment). Any benefits received should not be related to or redeemable for gaming. Benefits should not be limited to a short time window which may encourage customers to visit the venue when they were not otherwise intending to as this may result in gambling more than intended.

Integrating an account-based gambling system into an existing loyalty system may assist with implementation and uptake. Results from an experimental study with 363 Australian EGM players found that integration of an account-based system into a loyalty scheme was the second most important attribute in terms of customer preference for system design (following consistency across venues)[13]. Respondents indicated that they would want to receive points for spending and using player safety features. Consistent with this, the ability to receive

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[11] Gainsbury et al., (2024).

[12] Gainsbury, S.M., Chandrakumar, D., & Heirene, R. (2024). Use and Impact of Government-mandated activity statements for online gambling in Australia. Manuscript in preparation.

[13] Swanton, T.B., Garbarino, E., Collard, S.B., & Gainsbury, S.M. (under review) Preferences for cashless gambling payment systems with integrated harm reduction measures among electronic gaming machine gamblers: A discrete choice experiment.

membership points for signing up and using an account-based system were seen to increase the likelihood of regular EGM customers using this system based on survey results[14].

Data

De-identified information should be made available upon request for the purpose of appropriate research and evaluation.

Personal information

Communication strategies and campaigns should be developed to clearly communicate with user who their information will be used. It is likely that consumers will have concerns about the privacy of the information they share, including in terms of access by third parties including venues, government agencies, law enforcement and financial institutions. Consumers will also likely be mindful of security breaches. These will represent substantial concerns and barriers to use which must be proactively addressed with system design and consumer communication.

Tracking

One of the main advantages of an account-based system for harm-reduction purposes is the ability to track all customers and identify indicators of risky and potentially harmful gambling. It is not possible to positively identify all, or even most people who are likely experiencing gambling harms based on player data alone. However, predictive models can be developed which can detect some customers at various levels of risk. This can be done within and across sessions. When risky gambling behaviour is identified, systems can be designed to alert the customer with a real-time notification. Venue staff can also be alerted to have a conversation with customers to check-in with them. Identification of early stage of problem development may assist in preventing serious problems. Any notifications to consumers are likely to be helpful in assisting customers to reflect on their own gambling behaviour. Substantial research will be needed to implement, refine and evaluation a tracking and alert system, but there are substantial harm reduction advantages.

Funds

Deposits

Customers should be able to fund their accounts using cash, inserted into kiosks, as the benefits of account-based gambling are based on the design of the system, not the modality of payment. Cash is still preferred by many people in society and EGMs have traditionally been funded by cash. It is recommended that when implementing a major change, such as the requirement to have use account-based play, other elements of EGM play remain consistent to help customers adjust to the new system. Furthermore, some customers use cash to assist them to manage their gambling spend, providing harm-minimisation benefits of this payment method[15]. Use of in-venue facilities to obtain cash can assist venue staff in identifying customers who are repeatedly accessing money for gambling, which can assist in identifying

[14] Gainsbury, S., Santons, T., Heirene, R., Chandrakumar, D. (2024). *Account-based gambling. Insights from a large EGM Venue in Western Sydney.* Gambling Treatment and Research Clinic, University of Sydney.
[15] Swanton, T.B., Tsang, S., Collard, S.B., Garbarino, E., Gainsbury, S. M. (2023). Cashless gambling: Qualitative analysis of consumer perspectives regarding the harm minimisation potential of digital payment systems for electronic gaming machines. *Psychology of Addictive Behaviors.* https://doi.org/10.1037/adb0000962

customers potentially at-risk of engaging in problematic gambling. As such, the requirement to visit the cashier desk to add funds to the account may assist with harm-minimisation as this makes this process transparent and visible for staff.

Given the spend limits proposed, it would be consistent and logical that there are limits on the amount of funds which can be deposited into an account and transferred onto an EGM.

There are potentially detrimental consequences of enabling electronic methods to fund EGM gambling. Cashless transactions typically have lower psychological salience, making money seem less 'real' compared to cash which can reduce awareness of gambling expenditure[16]. Consumers are typically less aware of their spending and are willing to spend more when paying with cashless methods relative to cash. These impacts can potentially be reduced through the design of a cashless payment system. For example, when making a deposit into a digital wallet, or from a wallet to an EGM, there may be multiple steps requiring individuals to confirm the amount they wish to spend. Messages may include information to enhance the salience of spend, such as normative feedback (e.g., indicating if the amount is higher than most customers or relative to the customer's own previous spend). Alternatively, calculator features may include projections of what the spend would look like if it were repeated weekly, or what else that amount of money might represent if spent on non-gambling consumption opportunities. Even simple messages encouraging self-reflection (e.g., "Are you happy to lose $X?) may enhance informed decision-making. In addition to attempting to influence cognitions and intent, these messages also act as friction, requiring multiple steps to achieve the action of making a deposit and/or transfer of funds.

To further reduce the potential increased gambling due to electronic funds, it is recommended that automatic delays be imposed on any deposits following the first deposit of the same day. Research suggests that multiple ATM withdrawals or deposits to online gambling accounts within one day and/or gambling session is associated with the experience of gambling problems[17]. This should reset at the time of venue closing rather than midnight to prevent extended gambling sessions. Longer breaks are likely to be more effective than shorter breaks, as discussed in the comments above in reference to breaks in play.

Transfers and spend

Individuals should be required to enter an exact amount to transfer from their wallet without any prompts or default amount options. This is important to encourage an informed choice and

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[16] Gainsbury, S. M., & Blaszczynski, A. (2020). Digital gambling payment methods: Harm minimization policy considerations. *Gaming Law Review*, *24*(7), 466-472. https://doi.org/10.1089/glr2.2020.0015
Palmer, L., Cringle, N., & Clark, L. (2022). A scoping review of experimental manipulations examining the impact of monetary format on gambling behaviour. *International Gambling Studies*, *22*(3), 499-521.
https://doi.org/10.1080/14459795.2022.2041067 Hing, N., Cherney, L., Gainsbury, S. M., Lubman, D. I., Wood, R. T., & Blaszczynski, A. (2015). Maintaining and losing control during Internet gambling: A qualitative study of gamblers' experiences. *New Media & Society*, *17*(7), 1075–1095. https://doi.org/10.1177/1461444814521140
[17] Delfabbro, P., Thomas, A., & Armstrong, A. (2016). Observable indicators and behaviors for the identification of problem gamblers in venue environments. *Journal of behavioral addictions*, *5*(3), 419-428.
The Behavioural Insights Team in partnership with GambleAware (2018). Can behavioural insights be used to reduce risky play in online environments? https://www.bi.team/publications/can-behavioural-insights-be-used-to-reduce-risky-play-in-online-environments/
Haeusler, J. (2016). Follow the money: using payment behaviour as predictor for future self-exclusion. International Gambling Studies, 16(2), 246–262. https://doi.org/10.1080/14459795.2016.1158306
Ukhov, I., Bjurgert, J., Auer, M., & Griffiths, M. D. (2021). Online Problem Gambling: A Comparison of Casino Players and Sports Bettors via Predictive Modeling Using Behavioral Tracking Data. Journal of Gambling Studies, 37(3), 877–897. https://doi.org/10.1007/s10899-020-09964-z
Auer, M., & Griffiths, M. D. (2022). Using artificial intelligence algorithms to predict self-reported problem gambling with account-based player data in an online casino setting. Journal of Gambling Studies. https://doi.org/10.1007/s10899-022-10139-1

avoid 'anchoring', which is the tendency for individuals to base the amount they choose to transfer based on options provided. Research[18] has demonstrated that the requirement to manually enter an amount to gamble results in a lower amount being selected than when anchors or defaults are available.

It is recommended that individuals are able to quarantine funds in their accounts to prevent these from being immediately regambled. This might be an option to quarantine all wins, all wins over a certain amount, or the whole wallet for a specific period. Individuals may choose to set a quarantine on funds if they know that they tend to gamble more than intended.

Withdrawals

Individuals should be encouraged to withdraw funds from their digital wallet after they have finished a session of play rather than leaving funds in their account. This is due to the tendency to view funds in a gambling digital wallet as dedicated for gambling, rather than being fungible and used for other non-gambling purposes. There may be an exception for this if the digital wallet can be used for non-gambling purchases.

It should be easier or as easy to withdraw funds from a digital wallet as it is to make deposits. Withdrawals should be made to a bank account, ideally one with the same name as on the account, or via cash from a kiosk. It is important that customers can cash out immediately and do not have to return to the venue later to obtain their funds. As such, it is recommended that kiosks also be made available at busy times to avoid customers having to queue, for example, if they must leave venues quickly. Alternatively, and preferably, the system could be designed to enable customers to transfer funds to their bank account. This will reduce the tendency for customers to re-gamble their winnings. It also enhances safety for customers as they do not have to leave venues carrying any cash. This reduces the burden on venues in having to facilitate cash withdrawals and hold substantial amounts of cash in venues.

When players collect funds, there should be an ID check in addition to PIN check. This is important to reduce illegitimate use of cards by individuals. It is recommended that there be a maximum amount set for cash withdrawals. However, implications for this need to be considered including impacts on domestic and family violence, digital inequity, and unbanked individuals.

Self-exclusion

Account-based gambling should be linked with a state-wide self-exclusion system. Individuals who are self-excluded should have their accounts locked so that they cannot gamble. It is important not to delete customer accounts at any stage as if individuals wish to and are able to re-commence gambling, it is likely useful that there is a marker in their account that they were formerly self-excluded as this may be a useful way to monitor for potential risky gambling in the future.

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[18] The Behavioural Insights Team in partnership with GambleAware (2018). Can behavioural insights be used to reduce risky play in online environments? https://www.bi.team/publications/can-behavioural-insights-be-used-to-reduce-risky-play-in-online-environments/

Conflict of Interest Declaration

Dr. Sally Gainsbury is an invited member on the NSW Independent Panel on Gambling Reform and the Pillar Champion for Technology and Environment for the QLD Responsible Gambling Advisory Committee.

Since 2020, Dr. Gainsbury has received research funding through the University of Sydney from Entain Australia, Sportsbet, NSW Office of Responsible Gambling, West HQ, Brain and Mind Centre, Cambridge Health Alliance, and International Center for Responsible Gaming. She has provided subject matter expertise and received consulting fees from NSW Crown Solicitor's Office, Blue Sky, UK Behavioural Insights Team, Platypus Asset Management, Betcloud, Coms Systems, Advance Gaming, Star Entertainment, KPMG, QBE, Norths Collective, Gaming Machine Association of New Zealand, Nova Scotia Gaming Corporation, UK GambleAware, New Zealand Crown Counsel, Stibbe. She has received travel costs and/or honoraria for speaking from European Lotteries, National Betting Authority Cyprus, Asian Racing Federation, Leagues Club Australia, Australian Cricketers Association, Star Entertainment, CAMH, GREO, Informa, Senet, NSW Office of Responsible Gambling, and Washington State Council.