

Standing Committee on Justice and Community Safety
ACT Legislative Assembly
Canberra ACT
via email: LACommitteeJCS@parliament.act.gov.au

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To the Committee

Cashless Gaming Inquiry

The ACT Council of Social Service Inc. (ACTCOSS) represents not-for-profit community organisations and works tirelessly for social justice in the ACT. We are a not-for-profit peak body, working collaboratively with organisations and individuals to create a collective voice, advocating for positive social change, and justice and self-determination for Aboriginal and Torres Strait Islander peoples.

ACTCOSS are pleased to make a submission to the Cashless Gaming Inquiry. We aim to provide insights and recommendations regarding the integration of cashless gaming systems within the ACT, with a strong emphasis on the crucial aspect of mitigating gambling harm. As an active participant in discussions surrounding responsible gambling reform, ACTCOSS seek to contribute constructively to the ongoing dialogue on the potential implementation of cashless gaming systems in our region.

The use of Electronic Gambling Machines (EGMs) is the most effective predictor of problem gambling in the ACT, with the risk of gambling harm increasing the more time someone spends on EGMs.¹ Recognising this, it is important to approach the introduction of cashless gaming systems with a steadfast commitment to safeguarding vulnerable community members and curbing the adverse effects of gambling-related harm.

While the potential advantages of adopting cashless gaming systems for gambling harm reduction have been highlighted, it is essential to address key considerations to enhance the efficacy of these systems and mitigate unintended consequences. These considerations are integral to shaping the framework for a responsible and effective cashless gaming system.

Cashless gaming can take different forms but is most commonly a 'digital wallet' held on a card or smartphone. Funds can be loaded onto digital wallets by adding cash (like travel cards) and through cash transfers from bank accounts, debit and credit cards or other cash transfer services. One potentially influential determinant in determining whether cashless gaming exacerbates or diminishes gambling harm is the ease with which funds can be loaded onto the card. Notably, some research in gambling harm mitigation recommends that card top-ups be

¹ M Paterson, P Leslie and M Taylor, *2019 ACT Gambling Survey*, ANU Centre for Gambling Research, Canberra, 2019, p. 50, <https://csrc.cass.anu.edu.au/centres/cgr/2019-act-gambling-survey>

exclusively facilitated through physical cash, and direct transfers of funds from bank accounts or debit cards to digital wallets be restricted.² This recommendation aligns with the aim of minimising the ease of fund transfer, acting as a deliberate barrier against impulsive gambling behaviour. Further research which suggests that evidence linking cashless gaming to inherently reduced gambling harms may be a spurious association also notes that digital payments can cause a minimisation of the “pain of payment” that may enable unintended spending, unlike cash payments that are more strongly linked to a concept of “real” money.³

Furthermore, the suggestion to maintain limitations on accessing physical cash via ATMs and EFTPOS terminals within gaming venues would reinforce a commitment to responsible gambling practices. These measures collectively contribute to the overarching goal of ensuring that the ease of loading funds onto cashless gaming systems is sufficiently regulated, thereby preventing unchecked spending and promoting more measured and intentional gambling habits.

ACTCOSS recommends that any cashless gaming system introduced in the ACT adheres to the core principle that it must be explicitly designed and implemented with harm minimisation as the key priority. In addition, the following recommendations for cashless gaming system execution are intended to guide the direction of this priority:

1. **Controlled Accessibility:** cashless gaming should be deliberately less accessible than traditional cash-based gambling, primarily through measures that restrict fund loading to physical cash and restrict direct transfers from bank accounts or debit cards.
2. **Identification and Ownership:** card-based gambling systems must ensure that cards are linked to individuals, only one card can be obtained per person and that the use of multiple cards or accounts is not used to circumvent load-up restrictions. Card systems must have strict identification requirements for issue and usage.
3. **Data Collection and Privacy:** cashless gaming systems should prioritise the privacy of individuals and disallow the usage of private information for dissemination to third party operators, marketing purposes or for the addition of extra-located contact of individuals, such as for the purpose of encouraging return visits to gaming venues or participation in other types of gambling.
4. **Continued Cash Restrictions:** maintaining limitations on accessing physical cash within gaming venues through ATMs and EFTPOS terminals is crucial to complement the controlled approach of cashless gaming systems.
5. **Staged Approach:** While other jurisdictions have undertaken trials of cashless gaming, as a small jurisdiction with a limited number of gambling venues, we recommend that rather than a limited-venue trial, that the initial period of implementation of cashless gaming should include data collection protocols and clear goals for the usage of collected data to examine further pathways for the reduction of gambling harm, as well as thorough assessment of the impacts of the cashless system itself.

² UK Gambling Commission, [Cashless payment technologies in gambling premises - Gambling Commission](#), accessed 21 August 2023.

³ Hare S 2021, [What is the impact of cashless gaming on gambling behaviour and harm?](#), Victorian Responsible Gambling Foundation, Melbourne.



ACTCOSS believes that integrating these principles into the design and implementation of cashless gaming systems will contribute to substantially mitigating gambling harm and fostering a safer environment for all participants. ACTCOSS continues to advocate for broad measures to reduce the social, financial and emotional impacts of gambling harm to the ACT community, particularly for vulnerable community members. We emphasise that cashless gaming may be a tool for reducing gambling harm but should form only part of a suite of other measures for minimising gambling harm, such as those detailed in further submissions and reports available on the [ACTCOSS website](#).

Yours sincerely

A handwritten signature in blue ink that reads "Devin Bowles".

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