

Gambling Administration Guidelines

Casino Act 1997—Account Based Cashless Gaming Systems

Effective 3 December 2020

The following guidelines have been published by the Liquor and Gambling Commissioner under section 17 of the *Gambling Administration Act 2019* for the purposes of section 40B(1)(a) of the *Casino Act 1997*.

1. Introduction

Under section 40B(1)(a) of the *Casino Act 1997* the Commissioner may, on application by a person, approve systems to be operated in connection with authorised games, approved gaming machines or automated table game equipment, or classes of authorised games, approved gaming machines or automated table game equipment being account based cashless gaming systems.

The Commissioner must not approve a system for this purpose unless the system is able to be operated in compliance with the requirements of the *Casino Act 1997* (as relevant) and complies with the requirements of any applicable gambling administration guidelines.

These guidelines replace any previous prescription notice issued by the former Independent Gambling Authority which prescribed the required attributes for systems proposed for recognition as Account Based Cashless Gaming Systems.

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2. Commencement

These guidelines come into effect from 3 December 2020, being the date determined by the Commissioner by notice published in the South Australian Government Gazette.

The Commissioner may by notice in the Gazette vary or revoke these guidelines at any time in accordance with section 17(3) of the *Gambling Administration Act 2019*.

Version control will be used to indicate revisions to these guidelines.



3. Transitional provisions

A system previously recognised under section 40B of the *Casino Act 1997* as in force immediately before the commencement of sub-clause (6) of Schedule 1, Part 2 of the *Statutes Amendment (Gambling Regulation) Act 2019* will, on 3 December 2020, be taken to be an approved system under section 40B of the *Casino Act 1997* (as amended).

4. Intended audience

These guidelines are intended for use by system developers, regulators and the holder of the casino licence to support the evaluation and implementation of account based cashless gaming systems at the licensed casino for the purposes of the *Casino Act 1997*.

5. Purpose and scope

- (1) These guidelines specify the functional and technical requirements for the approval of account based cashless gaming systems which may be operated in connection with gaming machines and automated table game equipment operating at the licensed casino.
- (2) These guidelines ensure that the account based cashless gaming system operated at the licensed casino is secure, fair, reliable, auditable and fosters responsible gambling.
- (3) It is not the purpose of these guidelines to mandate a solution or limit technology.
- (4) Any matters arising from the evaluation of an account based cashless gaming system not covered by these guidelines will be considered at the discretion of the Commissioner.
- (5) These guidelines do not apply to account based cashless gaming systems operated at South Australian Hotels and Clubs (which is in place under other regulatory arrangements).

6. Interpretation

- (1) In these guidelines, unless the contrary appears—
 - (a) **applicant** means a person proposing a system for approval under section 40B(1)(a) of the *Casino Act 1997* and **application** has a corresponding meaning;
 - (b) **bets placed** means the person's gross gambling spend;
 - (c) **cashless card deposit** means the value transferred to the user account by the payment of money;
 - (d) **CATG** means a device which is automated table game equipment under the *Casino Act 1997*;
 - (e) **CEGM** means a device which is a gaming machine operated under the *Casino Act 1997*;
 - (f) **CGSC** means an account based cashless gaming system approved under the *Casino Act 1997*;
 - (g) **credits transferred from card to game** means the value transferred to a CATG or CEGM from a user account;

- (h) **credits transferred from game to card** means the value transferred to a user account from a CATG or CEGM;
- (i) **device** means an apparatus, or a configuration of apparatuses, which when operated in accordance with directions as to use or terms of approval (however described) constitutes—
 - (i) approved automated table game equipment; or
 - (ii) an approved gaming machine;
- (j) **gaming area** means a gaming area defined in section 3(1) of the *Casino Act 1997*;
- (k) **gross gambling spend** means the aggregate of the value risked;
- (l) **gross gambling wins** means the aggregate value of prizes won;
- (m) **monitoring system** means the relevant system approved by the Liquor and Gambling Commissioner for use under the *Casino Act 1997*;
- (n) **net player win/loss** means the person's net gambling outcome;
- (o) **official research project** means a research project designated as such in writing by the Commissioner, by reference to—
 - (iii) the terms of reference or project brief for the research project;
 - (iv) the identity of the principal researcher and the auspicing institution or organisation for the research project (if any); and
 - (v) the source of the funding for the research—
 and “**principal researcher**” has a corresponding meaning;
- (p) **player win from game** means the person's gross gambling wins;
- (q) **premium customer** means a premium customer as defined in section 3(1) of the *Casino Act 1997*;
- (r) **premium gaming area** means a premium gaming area as defined in section 3(1) of the *Casino Act 1997*.

(2) A reference in these guidelines to **a month** may be taken as a reference to—

- (a) a calendar month;
- (b) a calendar month period commencing on a particular day of a month other than the first day (that is, in a calendar monthly cycle);
- (c) a period of 30 days in a succession of periods of 30 days; or
- (d) a period of 35 days in a succession of periods of 35 days.

(3) A reference in these guidelines to **a day** may be taken as a reference to—

- (a) a calendar day; or
- (b) a 24 hour period in a succession of periods of 24 hours.

(4) A reference to—

- (a) an ***anonymous cashless gaming*** account is a reference to a cashless gaming account operated, in the licensed casino only, by card or token in the circumstance that the player has transferred value to the account without being required to provide personal details; or
- (b) a ***transparent cashless gaming account*** is a reference to the cashless gaming account of a player who is identifiable.

(5) A reference to ***a player being identifiable*** is a reference to the player having provided such details or consents as to enable the player's activity to be monitored, including by—

- (a) consenting to have a loyalty program record linked to a relevant system; or
- (b) enrolling in a system which allows players to voluntarily set loss limits or other indicators.

7. Dependencies

- (1) A gaming machine or automated table game equipment provided by the holder of the casino licence may only be operated in connection with an account based cashless gaming system if:
 - (a) the system is approved under section 40B(1)(a) of the *Casino Act 1997*; and
 - (b) the gaming machine is operated in connection with an automated risk monitoring system approved under section 40B(1)(b) of the *Casino Act 1997*; and
 - (c) the gaming machine is capable of displaying on screen messages of a kind prescribed in the applicable responsible gambling code of practice either on a primary screen or an ancillary screen; and
 - (d) the gaming machine is operated in connection with a pre-commitment system in compliance with the requirements prescribed by the Casino Regulations 2013.
- (2) An application for an account based cashless gaming system must include a certification as to the relevant system's capacity for connection with the monitoring system approved by the Liquor and Gambling Commissioner to be operated by the holder of the casino licence.
- (3) An applicant must provide, with the application, undertakings to the Commissioner that the applicant will, in respect of any official research project, procure and maintain:
 - (a) the reasonable co-operation of every licensee deploying the relevant system;
 - (b) any consents to the use the data reasonably required by the principal researcher;
 - (c) any changes to the applicant's, licensee's and third parties' privacy policies reasonably required by the principal researcher.

8. Submission requirements

- (1) An applicant seeking approval for an account based cashless gaming system for the purposes of the *Casino Act 1997* must formally request Consumer and Business Services to perform an evaluation of the product being submitted.
- (2) An applicant must include with the application:
 - (a) a description of the product being submitted and the intent of the submission;
 - (b) the market(s) which the product will be used;
 - (c) the contact details of where technical enquires regarding the submission may be directed;
 - (d) system architecture diagram and description on how the relevant system works;
 - (e) a detailed description of—
 - (i) the required hardware and software
 - (ii) the end-user cost structure; and
 - (iii) the individuals or corporate entities which will provide the relevant system to licensees;
 - (f) a statement as to relevant intellectual property licensing (if any);
 - (g) certification as to the relevant system's capacity for connection to the monitoring system.
- (3) All submission documentation and electronic media must be labelled with the company name, the product name, the product version and the submission date. Resubmissions must also include the resubmission number e.g. version 2. (Note: version numbers are to be unique and any change to an already approved submission should require this unique version number to change).
- (4) To assist in the evaluation of the solution, a report of any testing conducted on the product (prior to the submission) should be submitted. This report must contain the testing body's name, the name of the individual who conducted the testing, a description of what was tested, how it was tested (photos may be required), and the test results.
- (5) As part of the assessment process the Commissioner may request a demonstration of the system to assist in making a determination.
- (6) The approval of an account based cashless gaming system may be varied or revoked by the Commissioner in accordance with section 40B(5) of the *Casino Act 1997*.

9. Mandatory system attributes

In order to be approved as an account based cashless gaming system—

User Accounts

- (1) Concerning the maximum value to be stored and transferred from a user account to a device—
 - (a) in respect to the transfer of value into a user account for the CGSC, the system must not allow a person to—
 - (i) initially store value of more than \$5 000; and
 - (ii) increase (other than by transferring value from a device to the account) the value stored above \$5 000;
 - (b) in respect of an individual transfer of value from a cashless gaming account to a CATG or CEGM, the maximum transfer value is \$500.

Payment of Prizes

- (2) Concerning the payment of prizes—
 - (a) the system must allow a person to transfer from a device to a cashless gaming account the whole of the value held on the device and, if the device allows for a partial transfer, an amount nominated by the person.
 - (b) the system must allow a person to immediately redeem value held in a **transparent cashless gaming account** of a CGSC in a gaming area—
 - (i) in cash, of any value up to \$5 000; or
 - (ii) by cheque or by electronic funds transfer, of any value.
 - (c) the system must allow a person to immediately redeem value held in a **transparent cashless gaming account** of a CGSC for a premium customer in a premium gaming area only—
 - (i) in cash, of any value up to \$10 000; or
 - (ii) by cheque or by electronic funds transfer, of any value.
 - (d) the system must allow a person to immediately redeem value held in an **anonymous cashless gaming account** in a gaming area—
 - (i) in cash, of any value up to \$2 500; or
 - (ii) by cheque or by electronic funds transfer, of any value.

Statements

(3) Concerning the provision of account statements—

- (a) in the case of a **transparent cashless gaming account** of a CGSC, the system must provide, for any month in which there is activity—
 - (i) a posted statement; or
 - (ii) an emailed statement; or
 - (iii) a screen viewable statement with the facility to email the statement to any address and, in the event the person with the cashless gaming account has not opted to have a statement sent under either clause 9(3)(a)(i) or (ii), to suspend a cashless gaming account which has not been accessed in the previous 3 months until such time that the statement has been accessed—

setting out for each day of activity—

 - (A) cashless card deposits;
 - (B) credits transferred from game to card;
 - (C) credits transferred from card to game;
 - (D) bets placed;
 - (E) player win from game; and
 - (F) net player win/loss
- (b) in the case of an **anonymous cashless gaming account**, the system must provide for—
 - (i) a paper statement produced in the licensed casino and given to the person while present; or
 - (ii) a screen viewable statement with the facility to email the statement to any address—

setting out for each day of activity on the account in the preceding month—

 - (A) cashless card deposits;
 - (B) credits transferred from game to card;
 - (C) credits transferred from card to game;
 - (D) bets placed;
 - (E) player win from game; and
 - (F) net player win/loss.

Communications

(4) Concerning connection to the monitoring system—

- (a) the system must be capable of communicating with the monitoring system in a manner which is secure and which does not compromise the integrity of the monitoring system.

Records

- (5) In order to be approved as an account based cashless gaming system, the system must be capable of making a record of each transaction against a cashless gaming account, and retaining the record for a period of 4 years.
- (6) An application may propose a method for production of activity statements which includes using the statement production facility of another system.

10. Non-conforming applications

- (1) The Commissioner may consider granting approval for an account based cashless gaming system which does not have all of the attributes required in these guidelines.
- (2) Such applications must explain the extent of non-conformity by reference to technical limitations, or other mitigating factors, which, if accepted by the Commissioner, would justify the system being approved despite the non-conformity.
- (3) Without limiting the matters which might explain non-conformity for the purposes of clause 10(2), the following should be explained:
 - (a) whether further time for technical development would allow for the proposed system to conform in the future and, if so, when; and
 - (b) whether technical factors beyond the control of the applicant give rise to the non-conformity and, if so, how those factors might be overcome in time.

11. References

[Gambling Administration Act 2019](#)

[Casino Act 1997](#)

[Casino Regulations 2013](#)

12. Revision History

Version	Changes	Release Date
1	Original document	3 December 2020