



Economic Issues

EFTPOS In Gaming Areas:

Wrong Way – Go Back!

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**EFTPOS In Gaming Areas:
Wrong Way – Go Back!**



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Executive Director's Note

Welcome to the forty eighth issue of *Economic Issues*, a series published by the South Australian Centre for Economic Studies as part of its Corporate Membership Program. The scope of Economic Issues is intended to be broad, limited only to topical, applied economic issues of relevance to South Australia and Australia. Within the scope, the intention is to focus on key issues – public policy issues, economic trends, economic events – and present an authoritative, expert analysis which contributes to both public understanding and debate. Papers will be published on a continuing basis, as topics present themselves and as resources allow.

A recent amendment to the South Australian Gaming Machine Act 1992 will permit gambling venues to install EFTPOS terminals in the actual gaming lounge. This decision is contrary to all evidenced based research and runs counter to the sustained efforts of all jurisdictions to restrict access to cash in gaming areas. It is the wrong course of action; it contradicts the evidence and policy advice of the Productivity Commission; it exposes all gamblers to harm and reduces consumer protection.

This paper proceeds from a recent review of the amendment to the South Australian Gaming Machine Act 1992, to then consider the experience of the Victorian Government (the agent of public policy) and the industry (the agent of private interest) response to the removal of ATMs from hotels and clubs in that State. We summarise the “future situation” in South Australia as a result of the amendment to permit access to EFTPOS in the actual gaming area, including the existing policy on ATMs. Evidence from the Productivity Commission Report (Gambling 2010), from the most recent South Australia Gambling Prevalence Survey (2012) and findings from the review of the removal of ATMs from Victorian hotels and clubs are summarised. We conclude with a discussion of administrative matters that are relevant background to the recent amendment and provide our evidenced based recommendations – in summary ***Minister, Wrong Way: Go Back!***

The author of this paper Associate Professor Michael O'Neil (Executive Director, SACES). The views expressed in the report are the views of the author.

Michael O'Neil
Executive Director
SA Centre for Economic Studies
March 2016

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Introduction

The South Australian Parliament recently approved an amendment to the Gaming Machines Act 1992¹ to remove the prohibition on EFTPOS facilities in gaming areas in hotels and clubs.

This means that South Australia will be *the only* jurisdiction to permit, via EFTPOS facilities, access to cash in the actual gaming area of a hotel or club. The situation prior to this amendment is at Table 1 which is a clear summary of the intent of public policy to minimise harm and protect consumers. The decision to enable gamblers to access cash in the actual gaming area runs counter to the efforts of all jurisdictions and regulators (including evidence and policy advice of the Productivity Commission and researchers) to restrict access to cash whether that involves ATMs, the cashing of cheques and restrictions on credit facilities.

Table 1: Restrictions on ATMs/EFTPOS facilities in the gaming machine areas of clubs and hotels All States and Territories as at Productivity Commission Report 2010

State	ATMs	EFTPOS
New South Wales	Banned from gaming machine area of clubs and hotels.	Banned from gaming machine area of clubs and hotels
Victoria	Banned from gaming venues (exemptions available for small towns in regional Victoria where access to cash is limited)	Banned from gaming machine area of a gaming venue
Queensland	Banned from being in or close to gaming areas of venues.	Banned from (or within close proximity to) gaming machine area of a gaming venue
South Australia	Banned from gaming machine area of gaming venues and gaming floor of Adelaide Casino	Banned from gaming machine area of clubs and hotels and gaming floor of Adelaide Casino
Tasmania	Banned from hotels and clubs	Access available in hotels, clubs and casinos with the restriction of one cash withdrawal for gaming per day
Australian Capital Territory	Banned from gaming areas of hotels and clubs	Banned from gaming areas of hotels and clubs
Northern Territory	Banned from gaming areas of hotels, clubs and the casino	Banned from gaming areas of hotels, clubs and the casino

Source: Productivity Commission Inquiry Report, Volume 1, No. 50, 26th February 2010. Western Australia is excluded from the Table as it does not have gaming machines in hotels or clubs.

This paper proceeds from a review of the amendment to the Gaming Machine Act 1992, to then consider the experience of the Victorian Government (the agent of public policy) and the industry (the agent of private interest) response to the removal of ATMs from hotels and clubs in that State. We summarise the “future situation” in South Australia as a result of this amendment including the existing policy on ATMs. Evidence from the Productivity Commission Report (Gambling 2010), from the most recent South Australia Gambling Prevalence Survey (2012) and findings from the review of the removal of ATMs from Victorian hotels and clubs are summarised. We conclude with a discussion of administrative matters that are relevant background to the recent amendment and provide our evidenced based recommendations – in summary, Wrong Way: Go Back!

The Amendment: EFTPOS in Gaming Areas

The amendment to the Gaming Machine Act 1992 potentially increases access points to cash in a hotel and club – a third access point – as EFTPOS would still be available in other parts of the premises plus ATM withdrawal facilities in the venue. The argument was put that a gambler accessing EFTPOS facilities inside the gaming area could be observed by gaming staff and “that there is a better chance of appropriate intervention when the gambler is exhibiting problem gambling characteristics if the EFTPOS facility is located in the gaming area”.

Speakers in support of the amendment noted that this was an especially “controversial part of the legislation – and cited “anti-gambling groups in the community, as represented by Relationship Australia on the gambling reference group supporting this particular change.” (The Hon. R.I. Lucas, 16.51) The Hon. J.A. Darley (17.04) opposed the government’s proposal to reinstate EFTPOS facilities back into gaming areas.” He referred to the installation and use of ecashpospoint machines at gambling venues following changes that restricted the use of ATMs.

The Hon. G.E. Gago responded

“The Hon. John Darley raised concerns about EFTPOS and the possibility that venues may get around laws relating to EFTPOS. The gaming machine regulations already contain specific measures to deal with this matter. An EFTPOS facility can only be offered if the person operating the EFTPOS facility confirms the withdrawal amount with the person obtaining cash from the EFTPOS operating the EFTPOS facility or from a dispenser in the immediate vicinity of the EFTPOS facility, not being a dispenser that forms part of an automatic teller machine.

The Gaming Machine Regulations enshrine the requirement for face-to-face interaction with customers. What the bill seeks to do is to make sure that the customer is face-to-face with an employee who has benefited from recognised training. This training is required under the act to address gaming operations, responsible gaming, problem gambling identification (including automated risk monitoring), and also pre-commitment. The advanced training includes low level intervention and referral to gambling help services.”

We examine several of these matters in this review but suffice to say in response:

- the amendment allows for multiple EFTPOS withdrawals;
- a customer can use other EFTPOS facilities as well as ATM facilities in the venue;
- there is evidence that staff do not intervene and this is extremely difficult to do;
- training is an input and there is no research evidence as to its impact on measurable outcomes;
- cash can be obtained from a “customer accessed”² dispenser;
- technology advances such as “tap and go payments” and mobile devices reduce the amount of human interaction and will continue to be developed;
- there is no automated risk monitoring system across hotels and clubs that provides feedback to staff;
- pre-commitment is voluntary and cannot be monitored in hotels/clubs; and
- staff change-over at venues does not provide for consistent customer monitoring.

When all is said and done, a reading of Hansard comes down to four points;

- currently, a gambler leaves the gaming area and goes to a general EFTPOS terminal in the venue and hence is not observed by trained gaming staff;
- it is asserted “there is a better chance” of the appropriate intervention, where a gambler is observed by a trained gaming manager;
- there is no discussion of the fact that ATMs will still be available in hotels and clubs so that this amendment effectively increases points of access to cash withdrawals; and
- greater than acceptable weight is given to some supposed “anti-gambling or non-government concurrence” with the decision to allow EFTPOS in gaming areas.

It is critical to best practice public policy that supportive evidence is brought to the table to present and defend a policy decision/change. There has been great weight placed on “evidenced-informed/ evidence-supported” policy development in recent years. This paper attempts to adhere to that standard.

South Australia and ATMs

South Australia currently provides for gaming venues to have ATMs within a hotel or club but not within the gaming area. In addition, it allows for cash withdrawals from EFTPOS facilities as per the Business and Consumer Affairs Licensee Bulletin 2 May 2014. It now proposes to permit EFTPOS facilities in the actual gaming lounge/area with no limit on the number of withdrawals. That is to say, ways to access cash have in effect been increased within gaming venues.

The matters contained in the Bulletin of 2 May 2014 are the following:

“A bulletin was issued on 23 January 2014 to inform licensees that as from 1 February 2014, the Commonwealth Government, under the *National Gambling Reform Act 2012 (Cwth)*, would impose a \$250 per card per 24 hour withdrawal limit from ATMs operating at gaming machine venues.

On 25 March 2014 the Commonwealth Parliament repealed various sections of this Act which, amongst other things, means that there is no longer a Commonwealth Government imposed withdrawal limit from ATMs in gaming machine venues. This change came into effect on 31 March 2014.

The South Australian Government has approved the continuation of the \$250 per card per day withdrawal limit. The *Gaming Machines (Cash Facilities) Variation Regulations 2014 (SA)*, which commenced on 1 February 2014, imposes a \$250 per card per day withdrawal limit from automatic teller machines (ATM) operating at South Australian gaming machine venues.

The regulations also impose the following limitations on cash withdrawals by customers using EFTPOS facilities at South Australian gaming machine venues:

- each withdrawal must not exceed \$200;
- the person operating the EFTPOS facility must confirm the amount of cash requested to be withdrawn by the person immediately before the transaction is processed; and

- cash may only be obtained directly from a person operating the EFTPOS facility or from a dispenser which is in the immediate vicinity of the EFTPOS facility so long as the dispenser does not form part of an ATM.”

Relevant matters contained in an earlier Licensee Bulletin 23 January 2014 include the following:

The *Gaming Machines (Cash Facilities) Variation Regulations 2014 (SA)* would also include some refinements to the EFTPOS limitations so that customer facing safe cash dispensers (our emphasis added) can be installed, subject to certain requirements set out in the Regulations.

An attached Schedule 1 Gaming Machines Act 1992 further specifies the following:

- (nd) The licensee will not conduct the gaming operations on the licensed premises between the hours of 2 am and 8 am unless—
- a gaming machine manager or gaming machine employee who has completed advanced problem gambling intervention training is present in the gaming area at all times; and
 - arrangements are in place under which the gaming machine manager or gaming machine employee may immediately refer a person identified as engaging in problem gambling to a service to address the problem.

With respect to (i) above it is noted by Hon. T.A. Franks (16.40) in the second reading (26 March 2015) Statutes Amendment (Gambling Measures) Bill that when a problem gambler rang the Hampstead Hotel seeking to make an appointment to self-exclude the person “spoke to the barman because the gaming manager wasn’t there”. It is an obvious point that many venues in South Australia with limited numbers of EGMs simply do not have an employee in the gaming area at all times. This is a statement of fact.

In summary, South Australia retains ATMs in licenced gaming venues that provide for access by regular, “at risk” and problem gamblers to daily withdrawals of \$250 per withdrawal (the actual daily amount could be higher if different credit cards are used), withdrawals from EFTPOS facilities if they are present in other areas of the venue and now proposes an additional avenue to access cash (via EFTPOS) directly inside the actual gaming lounge. The EFTPOS facilities have no limit on the number of cash withdrawals.

The stated reason for providing EFTPOS inside the gaming lounge/area is so that a gambler may be observed by trained gaming staff with ‘the chance’ of an appropriate intervention (we note, this is undefined and there is no research evidence as to outcomes). This is a critical claim and one for which there is considerable evidence to the contrary; specifically that staff do not intervene. (See later comments, evidence to this effect.)

It would be far more preferable to create real situations of breaks in play where gamblers were required to leave the sounds, lighting and ambience of the gambling lounge before being able to access cash.

It must be remembered that for many years the industry vehemently argued, led principally by TABCORP and Tattersalls’ in Victoria, that staff could not intervene because they could not tell who was and who was not a problem gambler. Many in the industry still hold this view citing the reason that ‘you don’t know the gamblers’ financial background or what access to funds they have’. Operators of casinos are still reluctant to intervene even with the benefit of video surveillance and more numerous floor staff (see SACES 2015 “Responsible Gambling and Casinos”³) With the passage of time the industry was forced to recognise and include in staff training, key indicators or behaviours of problem gambling. Industry (casino sector and hotel/clubs) have been slow to use electronic data that could objectively indicate problem or excessive gambling or have not installed systems that are able to provide the data to analyse such behaviours.⁴

It is little more than wishful thinking that Parliament, Government and the community can shift the responsibility for intervention in regard to excessive cash withdrawals for the purposes of EGM gaming to staff in hotels and clubs, many who are relatively young, many who are employed part-time, who work shift work and who are most often dealing with customers who are much older than they are.

This was precisely the defence mounted by several venues and the AHA(SA) in a case several years ago (the individual was subsequently jailed), where it was reported that the individual was a regular gambler at three hotels, was known to the venues, gambled excessively but not once did any staff person intervene. The defence of the industry was that this was “only an isolated case that slipped through the net” when the evidence from gambling counsellors and problem gamblers themselves confirm that this was not an isolated case. In any case, staff training is an input no matter how intensive that training is, it is not an outcome and it does not guarantee any intervention at all (see later discussion).

Not yet defined is whether there will be signage in venues in South Australia such as ‘cash out here’ as is displayed in many Victorian venues where EFTPOS facilities were installed. (Appendix A) Also undefined is whether venues will be permitted to display stickers that inform gamblers to ‘please see gaming staff if you

have reached your daily ATM limit” which have come into use following the daily limit of \$250 set for ATMs in South Australia. Clearly, such signage is designed to encourage a customer to continue to access cash with which to gamble.

Victorian Government Legislation to Remove Venue ATM Facilities

From 1 July 2012 all Victorian hotel and club gambling venues cannot provide, or allow another person to provide, access to ATMs within approved gaming venues. ATMs are not permitted within an approved gaming venue, on the exterior wall of an approved gaming venue, on any land that is owned or leased by the venue operator or any car park owned or operated by the venue operator. (*Gambling Regulation Amendment (Licensing) Act 2009, Section 3.5.33C*)

Prior to 1 July 2012 an ATM could not dispense more than \$200 in any one transaction (more than \$400 in a 24 hour period), cash withdrawals from EFTPOS could not exceed \$200 in any one transaction and cash advances could not be given from a credit account.

Access to EFTPOS devices and ATMs were not available within the gaming machine area of any Victorian venue for the purposes of withdrawing cash. With respect to EFTPOS transactions that is still the situation today in Victoria whereas South Australia’s position is that it intends to permit EFTPOS terminals in the actual gaming area. It will be the only jurisdiction in Australia to allow access to cash in a gaming area.

Industry Response to the Removal of ATMs in Victoria

Prior to enactment of the Victorian Legislation and immediately following enactment, the industry response was to install new EFTPOS cash dispensing machines that were designed and marketed as a way to ‘get round the ban on ATMs in gaming venues’. That is to say, the public policy goal was sought to be undermined by the pursuit of private goals. It is understood that venue operators typically have installed EFTPOS devices inside the hotel/club (if they did not already have the devices) but not inside the gaming area. The report *Evaluation of the removal of ATMs from gaming venues in Victoria* (see later discussion) indicated there was an increase in EFTPOS usage after 1 July 2012.

One of the key providers of the cash dispensing machines or ‘ecashpospoints’ in Victoria is Progressive Venue Services which is a company founded by a former Tattersalls employee. They specifically market the cash machines as providing easy access to cash ‘without the customer having to leave the venue’. The machines are heavily promoted in Victorian gaming venues usually under the sign “cash out here”. The maximum withdrawal (our understanding is that this is set by banks/credit unions) is \$200 per transaction but they allow multiple transactions. They are not permitted in gaming rooms.

Cash Point, Cash Card, PosConnect and Progressive Venue Services are very active in marketing their product. They essentially promote to the venue what they call the ‘recovery rate of transactions’ attributed to these machines (i.e. removal of ATMs results in an in-venue reduction of transactions but these cash access solutions have a recovery rate or return rate of transactions as “high as 98 per cent [compared to 80 per cent for over the counter]”).

EFTPOS requires a member of the public in a club or hotel to go to a counter where an employee assists with the withdrawal so that the task necessitates face to face contact. The “level of assistance” varies with the technology.

There are a number of variations in EFTPOS terminal technology that influence the extent of face-to-face contact. For example, we are advised that in Victoria:

“Many of these machines are a quasi-version of an ATM.. You do have to give your card to a staff member but they swipe and then hand you a keypad and a machine does the rest, including dispensing money direct to the consumer. So the reading of the actual size of withdrawal and physical withdrawal of cash takes place out of their sight.. Others are more discreet, attached to underside of the bar on customer side, so you push a keypad at the counter but then return the pad to staff when finished, the money and receipt comes out under the counter where staff cannot see it.”

It is reasonable to ask why the industry was so active in replacing ATMs with access to another form of a cash dispensing machine. Simply put, the new cash dispensing facility was not for the general public as they can use cash brought into the venue or a credit card for meals and alcohol. The cash dispensing EFTPOS machines were principally installed to provide easy access to cash for gamblers as the venue and industry were concerned that they “might have to leave the venue” once ATMs were removed.

Victorian Government’s Counter Response

The Victorian government announced that it intended to extend the ban (on ATMs) to apply to any cash access device that does not require the customer to interact with venue staff (note: still outside a gaming lounge) before any decision to withdraw cash is actioned by the customer.

The Minister at the time was concerned about the installation of these cashpoint EFTPOS machines as a way of getting around the ATM removal legislation. In 2012, the Victorian Parliament passed the *Gambling Legislation Amendment (Transition) Act 2012* (the Transition Act). The Transition Act extended the prohibition on ATMs in gaming venues and the casino to cover all alternative cash access facilities that do not require staff interaction before any decision to withdraw cash is actioned by the customer. The second reading speech for the Transition Act noted that a cash access device (such as an EFTPOS facility) that required staff interaction before action to withdraw cash is taken by the customer will not be prohibited and will instead be subject to the existing restrictions on EFTPOS devices in gaming venues. The prohibition on alternative cash access facilities came into effect at the same time as the prohibition on ATMs (1 July 2012).

The Victorian Commission for Gambling and Liquor Regulation (VCGLR) has published rules that require venue operators to ensure that EFTPOS devices must not be accessible by any person within the gaming machine area of an approved venue for the purposes of withdrawing cash. EFTPOS withdrawals must be outside the gaming room. However and importantly, the Victorian Government has gone much further than enacting legislation to remove ATMs from all gaming venues, to include prohibiting EFTPOS in gaming areas, including legislating to introduce mandatory pre-commitment technology on all electronic gaming machines (EGMs) and to introduce a voluntary for the gambler, compulsorily for the machine, pre-commitment scheme to commence on 1 December 2015. The South Australian Centre for Economic Studies (SACES) is evaluating this scheme.

The Productivity Commission Report 2010

The Productivity Commission’s Report (Gambling 2010) into Australia’s gambling industries provided a detailed snapshot of the nature, extent and impacts of gambling activities across all states and territories. Of particular interest with respect to this debate is Chapter 13 *Access to Cash and Credit* (pp. 13.1 to 13.52). The Commission referred to previous studies and reports which investigated the link between problem gambling and the accessibility of cash and credit from ATM and EFTPOS facilities. The Commission cited evidence of a close association between the use of ATMs/EFTPOS facilities in venues and problem gambling. The first key point made by the Commission was:

Higher risk gamblers are more likely to use ATMs/EFTPOS facilities in gambling venues for gambling than other gamblers. (p. 13.1)

The Commission noted that the presence of these facilities contributed to problem gambling. Problem gamblers themselves reported a strong preference for the removal of ATMs from gaming venues.

Consistent with the Commission’s 1999 Report the later report (2010) endorsed legislation and regulations that had the effect of limiting opportunities for gamblers to make impulsive withdrawals of cash and/or provided a cooling off period in which gamblers might rethink their decision to continue gambling. In the period between the Commission’s Reports (1999 and 2010) state and territory governments had taken harm minimisation measures to effectively limit the ease with which cash could be accessed in gambling venues, including restrictions on:

- ATMs/EFTPOS facilities – (i.e. location, distance from gaming floor, single transaction limits, daily limits regarding number/value of transactions);
- banning/restricting credit facilities (i.e. cash advances from credit cards);
- requiring cheque payment of large prizes, restricting cash prizes; and
- banning/restricting cashing of cheques at gambling venues.

Under current legislation all States/Territories ban ATMs and EFTPOS from gaming floors of hotels and clubs to limit access to cash and reduce the risk of problem gambling. The new law permitting the introduction of EFTPOS facilities within the gaming floor of venues would make South Australia the *only* state which permits patrons to access cash for gambling from the gaming floor. This policy goes against all the evidence obtained from problem gamblers themselves and recommendations provided by the Productivity Commission (PC) based upon their own research and supporting analysis from various gambling studies into problem gambling.

Problem gamblers and “at risk” gamblers have a higher propensity to withdraw money using ATMs/EFTPOS compared to recreational gamblers (see Table 2). Results from the most recent Queensland prevalence survey showed:

- problem gamblers have higher usage of EFTPOS facilities with 51 per cent of problem gamblers indicating they “sometimes, often, very often” use EFTPOS facilities to obtain cash for gambling compared with 10 per cent of recreational gamblers;
- problem gamblers have higher usage of ATMs with 87 per cent indicating they “sometimes, often, very often” use ATMs to obtain cash for gambling compared with 20 per cent of recreational gamblers; and
- moderate risk and problem gamblers are more likely compared with low risk and recreational gamblers to withdraw cash from a venues ATMs/EFTPOS facilities before and during a gambling session.

The South Australian proposal is premised on the claim that allowing access to EFTPOS facilities in gaming areas is acceptable and will not increase problem gambling because using the facility requires face-to-face contact discouraging repeated withdrawals. The logic being that problem gamblers will feel too embarrassed (which illustrates the stigma attached to problem gambling) and also do not want to be identified by venue staff. Research shows problem gamblers do feel self-conscious about making repeated cash withdrawals from ATMs/EFTPOS. However, relying on this observation as a basis for public policy has not proven sufficient or reliable to prevent problem gambling. In any case, South Australia now provides three access points to cash in a venue!

Results from the Queensland study are consistent with (Delfabbro et al. 2007) who investigated the use of ATMs/EFTPOS facilities by problems gamblers:

- of venue staff surveyed 86 per cent had seen gamblers getting cash out of an ATM or EFTPOS facility at the venue on two or more occasions for the purpose of gambling;
- amongst South Australian problem gambling councillors surveyed 10/15 reported their clients (problem gamblers) had accessed cash out using and ATM or EFTPOS facility to gamble on two or more occasions.

Table 2: Frequency of accessing ATMs/EFTPOS facilities in pub or club over the last 12 months, Queensland, 2008-09^(a)

Type of cash facility	Frequency	Recreational gamblers ^(b) (per cent)	Low risk gamblers ^(c) (per cent)	Moderate risk gamblers ^(d) (per cent)	Problem gamblers ^(e) (per cent)
ATMs	Never, rarely	79.5	54.2	30.5	13.3
	Sometimes, often, very often	20.4	45.8	67.8	86.7
EFTPOS facility	Never, rarely	90.1	80.4	66.6	49.1
	Sometimes, often, very often	9.9	19.4	33.4	50.9

Note: Estimates based on raw data from the Queensland household gambling survey for 2006-07 (30,000 adults) and for 2008-09 (15,000 adults).
 (a) = Commission estimates based on raw data from the Queensland household gambling survey for 2008-09 (questions 26 and 28) The 2008-09 survey was of 15,000 adults. CPGI = Canadian Problem Gambling Index. (b) = Recreational gamblers (CPGI = 0). (c) = Low risk gamblers (CPGI = 1 or 2). (d) = Moderate risk gamblers (CPGI = 3 to 7). (e) = Problem gamblers (CPGI = 8+).

Source: Productivity Commission Inquiry Report, Volume 1, No. 50, 26th February 2010, Table 13.2.

In general, it is fair to say that with respect to Government and industry responses to recommendations of the Productivity Commission both selectively chose and quote from the Commission’s reports to justify a change in regulation or some relatively minor policy amendment which is most likely to have minor impact on problem gamblers and no impact on gambling revenue. The Productivity Commission has recommended action on \$1 maximum bet limits, it has recommended a much stronger approach be adopted to pre-commitment and it has recommended greater restrictions on access to cash yet the silence of government on these reforms is deafening.

The Commission recommended (PC Rec:13.2) that based on the limited evidence available:

- ATM/EFTPOS facilities should be a reasonable distance from the gaming floor, visible to the public and the venues staff, yet not to gamblers, from the gambling floor” (PC13.37); and
- cash withdrawals from ATM/EFTPOS facilities should be limited to \$250 a day except for casinos.

The South Australian amendment is in direct opposition to the research and considered policy positions advocated by the Productivity Commission.

South Australia 2012: Gambling Prevalence Survey, Social Research Centre, University of Melbourne

We referred earlier to the most recent Prevalence Study in South Australia. The findings with respect to problem gamblers and access to cash to gamble can be summarised as:

- problem gamblers tended to gamble relatively large amounts at each session (22.4 per cent usually gambled more than \$200 at each session);
- problem gamblers mostly gambled an amount of money that was *“far more than usual”*;
- of all past year venue gamblers 5.3 per cent accessed gambling cash via a credit card cash advance; 17.5 per cent obtained extra cash from a venue ATM during a gambling session; while 13.4 per cent obtained cash using a venue EFTPOS facility;
- the use of these methods was more common amongst those venue gamblers who were moderate risk or problem gamblers; and
- of problem gamblers 25.3 per cent obtained cash by a cash advance on a credit card; 64.8 per cent drew extra gambling cash from a venue ATM during a gambling session; while 52.3 per cent used EFTPOS facilities.

So the evidence is that problem gamblers use ATMs in venues and already use existing EFTPOS facilities in venues (that have face-to-face contact) to gain access to cash to gamble. There is no evidence that staff intervene in the current policy setting nor the effectiveness of any intervention if it actually occurs.

Industry Concludes: Restricting Access to Money

In submissions to the Productivity Commission’s 2010 Inquiry peak industry bodies that host EGMs and suppliers of ATM and EFTPOS facilities clearly indicated their reservations concerning EFTPOS facilities without daily limits and the unrealistic expectation that hotel/club staff are appropriate “gate keepers” to a person wishing to withdraw their own banked money.

ATM Industry Reference Group

EFTPOS is a less sophisticated means of cash access than ATMs. Transaction control is completely reliant on the operator of the terminal, which, when coupled with daily limits of up to \$2,000 combines to create a dangerous risk to problem gamblers. There are no systemic fall backs in place to provide for any daily, or transaction limits. So, to that point, allowing cash out on EFTPOS would create and easily accessible loophole to access cash for problem gamblers if this is combined with volume, or value limits at ATMs in licensed venues. (PC: 13.19)

The ATM Industry Association made the point that:

“one cannot prevent a person from his own banked money when the want to withdraw it” (PC 13.27).

Australian Hotels Association

“It is unrealistic to expect hotel staff and patrons to process an EFTPOS transaction each time a patron without cash sought to purchase a drink, a meal or a packet of chips. ... It will simply not be possible for hotels to process large numbers of transactions in a timely manner”. (PC 13.19).

Cashcard Australia:

“... venues with more than one cash access point...those housing more than one ATM device from different deployers, as sometimes can be the case in larger gaming venues, or offering EFTPOS cash-out ... will allow problem gamblers to exceed daily withdrawal limits”. (PC 13.23).

The fact of the matter is that there are no restrictions on daily limits from EFTPOS terminals and there is no legal obligation or compulsion for a number of staff to query any customer seeking multiple cash withdrawals.

The Evidence: Restricting Access to Money

The removal of ATMs from gaming venues as in Victoria, the location of ATMs away from gaming floors in hotel/clubs and all Australian casinos, restrictions on the use and availability of credit, the requirement to pay winnings above a certain amount by cheque – these and other measures designed to minimise harm are acknowledgment of the need to restrict access to money for those “at risk” of problem gambling. International best practice includes banning of house credit (also banned in all Australian jurisdictions), prohibition on cheque cashing and limits on cash out from ATMs.

Restricting access to cash which is then used to gamble is essentially a protective strategy

Professor Robert Williams⁵ in a recent meta-analysis of harm minimisation measures concluded:

“...anecdotal and existing survey data indicate that restricting ready access to cash is a potentially effective strategy. First, it is well established that problem gamblers access cash machines more frequently than regular gamblers; second, problem gamblers in treatment report that the most common reason for terminating a gambling session and leaving a gambling venue is because they have run out of money” (Williams p71)

Problem gamblers self-report that access to cash (immediate access) exacerbates gambling participation and harm and they also consistently self-report that ATMs should not be located in gambling venues. The same applies to EFTPOS facilities.

Consistent with other public health policy approaches such as restrictions on access to alcohol, tobacco and firearms then restrictions on access to cash, that might, but likely would, have some inconvenience to the general public are readily tolerated and accepted. This is in fact a clear principle of best practice public policy – it is why there are limits on alcohol consumption at certain events, the use of plastic not glass drink containers, lock-out laws, no smoking at events or specified locations. Public health concerns are also driving the debate on personal cashless debit cards to ensure that welfare benefits cannot be used for alcohol, drugs or to gamble. The failure of government to adopt a clear and consistent public health approach to gambling (i.e. to recognise that the social and economic cost of EGM problem gambling outweighs the benefits) leads it to adopt a policy with respect to EFTPOS cash access that has no sound evidence based justification.

An analogy would be – we discard all electronic systems for monitoring speeding and running a red light and instead rely on some undefined human intervention to determine who is really speeding (i.e. who wants money for gambling) and who is accidentally speeding (who wants money to pay for a meal/dinner/drinks for an evening out).

Evidence Continued: Victorian Research and Evaluation

The most recent evidence with respect to the interplay of – access to cash, ATMs, EFTPOS, industry response and staff interaction – is from the evaluation of the policy decision to remove ATMs from Victorian hotels and clubs.⁶

There is considerable evidence from research showing that venue-based ATMs were among the top causes of overspending amongst EGM players in Australia (SACES 2005; McMillen, Marshal and Murphy 2004; New Focus Research 2005; Hare 2009). The evidence is sufficiently strong that it formed the justification for the major harm reduction and consumer protection measure legislated by the Victorian government to remove ATMs from Victorian venues operating EGMs.

As noted earlier, venues responded by removing ATMs and installing or enhancing electronic funds transfer at point of service (EFTPOS) facilities within venues to allow cash withdrawals.

An evaluation of the Victorian policy directive to remove ATMs from gaming venues provides research evidence as to the response of venues to facilitate customer access to cash and the response of gamblers and other patrons to cash withdrawal facilities.

With respect to the ultimate objective of the removal of ATMs from gaming venues – which was to restrict access to cash by problem and at risk gamblers – the report concluded:

- *Problem gamblers:* entrenched problem gamblers continued to access additional funds from external cash facilities or venue-based EFTPOS.
- *Costs to patrons:* ATM removal was likely to be less effective for some problem gamblers and had caused minor inconvenience to EGM venue patrons.
- *Harm minimisation:* the removal of ATMs from venues with EGMs (or ‘pokies’) had been an effective harm minimisation measure in the State of Victoria.
- *Consumer protection:* ATM removal had similarly been an effective consumer protection measure.

The report did not cite actual recorded withdrawals from ATMs and EFTPOS facilities (and these are available from suppliers) but notwithstanding, concluded that

- problem gamblers typically spent significantly less money on EGMs after the removal of ATMs when at hotels and clubs; and
- qualitative data suggested reduced spending was related to a reluctance to use EFTPOS excessively.

Staff Intervention: Findings

What evidence is there that staff intervene?

The recent decision of the Parliament of South Australia to allow EFTPOS in gaming areas is based on an assertion that staff will have the incentive, capacity, confidence and authority to intervene when patrons seek to withdraw cash.

This assertion is without foundation with respect to the gambling industry and in any case, the assertion that staff will volunteer to intervene can never be the basis of good public policy. The foundation of government legislation is rarely (if ever) a “polite request to intervene”. For example, in cases of suspected child abuse or children at risk, it is an obligation of the medical fraternity, teachers and others who may suspect abuse to report this to authorities. Likewise, there is a legal obligation to restrict the service of alcohol. There is no legislated duty of care imposed on the venue to intervene to stop a person accessing their own banked funds and there never can be.

There does not appear to be any requirement of any staff member to manually or electronically record the number of transactions an individual may make in the gaming area (or gaming venue) so that a physical record is made, a record of an intervention is made, and a record of the outcome of that intervention.

There were five key conclusions from the Victorian research with respect to staff intervention:

- staff were observing multiple EFTPOS withdrawals but were not necessarily using this information to guide interventions with patrons;
- venue based data showed that staff were observing patrons making multiple withdrawals through EFTPOS but in general were not using this information to inform identification of possible problem gamblers;
- venue data also suggested that it was difficult to monitor the number of EFTPOS withdrawals patrons made without computer monitoring and that some patrons were finding ways to circumvent the new systems (e.g. accessing cash through local ATMs);
- problem gamblers were still more likely to report multiple cash withdrawals through EFTPOS post-implementation compared to other groups; and
- venue managers believed patrons had generally adapted to the new systems but that these services were less convenient and incidental customer traffic was affected. There was concern that the intervention was not being effective in impacting problem gambling due to lack of daily limits.

Evidence from Victoria and South Australia⁷ supports the conclusion that employees are not comfortable approaching suspected problem gamblers. There is no evidence that senior staff would approach someone they did not know and certainly frontline staff report “they are unhappy the responsibility (to identify problem gamblers) has been thrust upon those at the bottom of the hierarchy and feel challenged in having the confidence to approach and not offend a patron. (Hing, N. et al, p. 26)⁸

While there has been some work to improve problem gambler player behaviour identification intervention of any sort remains problematic which is why the Productivity Commission (2010) did not support any “mandatory requirement for venue based problematic player identification and intervention”. (PC, p. 12:45)

Daily Limits: Findings

With respect to daily limits there were three key findings:

- problem gamblers were most likely to see personal benefits and to support the removal of ATMs from venues (i.e. restrict access to cash);
- problem gamblers showed a clear preference for the removal of ATMs and, to a lesser extent, EFTPOS, from venues altogether; and
- the vast majority of patrons wanted daily limits on the amount of money that can be withdrawn from ATMs or EFTPOS at venues.

The Victorian Experience: Key Conclusions

The findings from the Victorian experience and research evaluation with respect to the key question of access to money – via ATMs, via the shift between ATMs and EFTPOS –

- the most entrenched problem gamblers are likely to circumvent the impact of ATM removal by accessing additional funds via external ATMs or EFTPOS; and
- the introduction of daily limits on EFTPOS may improve the effectiveness of the intervention as some gamblers are now withdrawing much more money at venues than they were previously (when they were constrained by daily limits on ATM withdrawals).

A Final Comment: The South Australian Gambling Regulation Reference Group

In discussing the amendment to permit EFTPOS in the gaming area, the Hon. R Lucas indicated that this was the “most contentious part of the bill” but was assured that the non-government sector supported the decision. This assurance was misplaced. The Hon. T. Frank, Hon. R. Brokenshire and the Hon. J. Darley indicated their opposition to the proposed change.

In the debate, reference was made to a Gambling Reference Group which does not exist and which was disbanded in February 2013. A Gambling Regulation Reference Group consisting of government members (6 including the chair), industry representatives (5), the non-government sector (3) and United Voice (1) was established to consider the 22 amendments which have their origins as derived from the 2013 Amendments Bill and an assessment of changes since that item.

I am advised that there was no detailed discussion in the committee regarding EFTPOS in the gaming area, and that the committee (and often not all members could attend) was not provided with any substantive discussion or evidence as to the proposal. The representative from Relationships Australia (SA) recalls a telephone conversation with a government official where a number of amendments were discussed, but clearly the process was not thorough, research evidence was not presented to the Reference Group; the proposed change was grouped with other administrative matters of greater import to government officials.

It does not appear that a considered process was undertaken at all, such as to debate the impact of this decision, the fact that ATMs (and they are often very close to the gaming area) would remain in venues along with other EFTPOS terminals or even the implications of technology and design of terminals and card readers (e.g. the ability to simply wave a card over a reader, the requirement of staff to maintain any physical record, etc).

The non-government representatives were essentially service providers and while highly skilled and experienced in service provision, they are not in a position to know the research, they are not policy advisors and no member of the Regulation Reference Group appears to have advanced any serious discussion of the existing research, the recommendations of the Productivity Commission (1999 and 2010) or the most recent findings of the ATM removal study in Victoria (2012).

In summary, this decision is wrong, it has not on all appearances been fully discussed in the Regulation Reference Group; it has not been based on evidence; it is an amendment that is not supported by serious research nor would it be supported by problem gamblers themselves.

The Parliament cannot be assured that this matter has been fully considered!

Conclusion and Recommendation

Controls on problem gambling or indeed any level of gambling based on devices such as access to ATMs or EFTPOS are simply unsustainable as technological change continues to advance the functionality and capacity of these devices.⁹ This is widely acknowledged across the ATM/EFTPOS industry and those closely involved with the impacts of problem gambling. To then also rely on some unspecified and un-documented human intervention in an actual gaming lounge without any knowledge of how an individual’s card is linked to own banked or credit based funds is foolhardy. The last twenty five years of state, national and international experience and research into “at risk” and problem gambling conclude that restricting access to cash is important to reduce the harms from gambling. Public policies have all been directed to this objective whether that involves prohibitions on access to physical means such as ATMs, EFTPOS and cash advances or restrictions on credit facilities for all forms of wagering and gambling.

Best practice based on research findings concludes:

“Research findings (both anecdotal and from survey data) suggest that policies to restrict immediate access to cash (e.g. ATMs) are potentially effective approaches in reducing the degree to which gamblers exceed financial limits. This strategy may be especially significant when considering that gamblers are often in “hot” psychological states as they approach their limits, creating vulnerability to impulsive gambling continuation leading to money losses they cannot afford. The logic here is to create a time buffer between the impulse to obtain more money (the “hot” decision), and acting on the impulse. Thus, ATMs should not be in gambling venues.”¹⁰

The very same logic applies to prohibiting EFTPOS facilities from gaming areas.

The Productivity Commission (2010) specifically stated in Recommendation 13.2:

“ATMs/EFTPOS facilities should be a reasonable distance from the gaming floor, visible to the public and venue staff, yet not to gamblers from the gambling floor” (p. 58)

The recent decision of the Parliament of South Australia represents a complete u-turn in the face of all previous evidence-based public policy that is designed to restrict access to cash.

It is a u-turn that is wrong in principle and in practice; “a chance to intervene” is not substantiated by the evidence and is in fact a gamble. Whatever the amount and quality of staff training, notwithstanding staff can assist, advise and intervene if there is an invitation or obvious reason to do so, best practice public policy cannot rely on the possibility that human interaction will occur or be of any consequence.

It is recommended that the South Australian Parliament revisit this decision to allow EFTPOS terminals in the gaming area of hotels and clubs and rescind this decision.

It is recommended that the South Australian Parliament review the evidence as to the impact of ATM removal from Victorian hotels and clubs and consider a similar policy initiative.

Appendix A





Appendix B

Gaming Machines Act 1992

What has changed in the interim?

2002 SACES Comment: In 2002 not allowed to provide access to cash within a gaming area.

This Act is reprinted pursuant to the Acts Republication Act 1967 and incorporates all amendments in force as at 25 July 2002.

51A Cash facilities not to be provided within gaming areas

- (1) The holder of a gaming machine licence must not provide, or allow another person to provide, a cash facility within a gaming area on the licensed premises. Maximum penalty: \$35 000.
- (2) The Commissioner may, by instrument in writing, exempt a licensee who has, on the commencement of this section, a cash facility within a gaming area on the licensed premises from the operation of this section.
- (3) An exemption may be granted under subsection (2) only for such period as the Commissioner thinks necessary for the purpose of the removal of the cash facility from the gaming area and as is specified in the instrument of exemption.
- (4) The Minister may, if he or she thinks exceptional circumstances exist for doing so, exempt a licensee (conditionally or unconditionally) from the operation of this section.
- (5) A licensee who contravenes a condition of an exemption granted under subsection (4) is guilty of an offence. Maximum penalty: \$35 000.

2013 SACES Comment: In 2013 not allowed to provide access to cash within a gaming area.

Division 2—Offences relating to conduct of gaming operations

51A—Cash facilities not to be provided within gaming areas

- (1) The holder of a gaming machine licence must not provide, or allow another person to provide, a cash facility within a gaming area on the licensed premises.
Maximum penalty: \$35 000.
- (2) The Commissioner may, by instrument in writing, exempt a licensee who has, on the commencement of this section, a cash facility within a gaming area on the licensed premises from the operation of this section.
- (3) An exemption may be granted under subsection (2) only for such period as the Commissioner thinks necessary for the purpose of the removal of the cash facility from the gaming area and as is specified in the instrument of exemption.
- (4) The Minister may, if he or she thinks exceptional circumstances exist for doing so, exempt a licensee (conditionally or unconditionally) from the operation of this section.
- (5) A licensee who contravenes a condition of an exemption granted under subsection (4) is guilty of an offence. Maximum penalty: \$35 000.

2015 SACES Comment: In 2015 prior to recent amendment not allowed to provide access to cash within a gaming area.

93—Amendment of section 51A—Cash facilities not to be provided within gaming areas

Section 51A (2) and (3)—delete subsections (2) and (3)

51A—Cash facilities not to be provided within gaming areas

- (1) The holder of a gaming machine licence must not provide, or allow another person to provide, a cash facility within a gaming area on the licensed premises.
Maximum penalty: \$35 000.
- (4) The Minister may, if he or she thinks exceptional circumstances exist for doing so, exempt a licensee (conditionally or unconditionally) from the operation of this section.
- (5) A licensee who contravenes a condition of an exemption granted under subsection (4) is guilty of an offence.
Maximum penalty: \$35 000.

2015 SACES Comment: In 2015 post amendment now permitted to provide access to cash within a gaming area.

Recent amendment provides for access to cash in the actual gaming venue through an EFTPOS facility that requires human operation. The research evidence consistently maintains that access to cash in any part of the gaming venue should be restricted as much as possible.

End Notes

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- 1 Statutes Amendment (Gaming Measures) Bill 2015 9, Amendment of section 61 A Cash facilities not to be provided within gaming areas.
 - 2 A customer access terminal requires a staff member to accept a transition request on a screen but the cash is directly dispensed to the customer on the customer side of the bar/reception. The cash access industry recommends these types of systems as they minimise human intervention and have the highest utilisation rate (relative to split systems or over the counter systems).
 - 3 SA Centre for Economic Studies (forthcoming 2015), "Responsible Gambling and Casinos", commissioned by Gambling Research Australia.
 - 4 The Adelaide Casino does have an Automatic Monitoring System which is soon to be the subject of an evaluation.
 - 5 Williams, R.J., et al, 2012 Prevention of Problem Gambling: A Comprehensive Review of the Evidence and Identified Best Practice, Ontario, Canada.
 - 6 Op. cit.
 - 7 Hing, M; Nisbet, S. and E. Nuske (2010), "Assisting Problem Gamblers in South Australian Gambling Venues", March, Southern Cross University.
 - 8 Ibid, p. 26.
 - 9 KPMG (2002), "Problem Gambling – ATM/EFTPOS Functions and Capabilities" report prepared for the Commonwealth Department of Social Services, September
 - 10 Williams, R.J., West, B.L. and R.I. Simpson (2012), "Prevention of Problem Gambling: A Comprehensive Review of the Evidence and Identified Best Practices", report prepared for the Ontario Problem Gambling Research Centre and the Ontario Ministry of Health and Long Term Care, October, p. 96.