

Report
Queensland Card-based Gaming Trials



Sandgate RSL Club
Redcliffe RSL Club



Office of Regulatory Policy

Department of Employment, Economic Development and
Innovation

July 2009

© The State of Queensland, Department of Employment, Economic Development and Innovation, 2009.

Except as permitted by the *Copyright Act 1968*, no part of the work may in any form or by any electronic, mechanical, photocopying, recording, or any other means be reproduced, stored in a retrieval system or be broadcast or transmitted without the prior written permission of the Department of Employment, Economic Development and Innovation.

Table Of Contents

Executive Summary	3
1.0 Trial information and research methodology	8
1.1 Sandgate RSL Club.....	8
1.2 Redcliffe RSL Club	8
1.3 Research methodology	8
2.0 Caveats.....	9
3.0 Report structure	9
4.1 Analysis of uptake of card-based gaming	9
5.0 Player experiences with card-based gaming.....	11
5.1 Ease of set up of card-based gaming and provision of player information	11
5.2 Player experiences with card-based gaming.....	13
5.3 Player experiences with limits and warnings.....	14
6.0 Venue experiences with card-based gaming.....	19
7.0 Future directions for card-based gaming	21
APPENDIX A – SCOTTLER CONSULTING KEY FINDINGS FROM THE SANDGATE RSL TRIAL	22
APPENDIX B – SCOTTLER CONSULTING KEY FINDINGS FROM THE REDCLIFFE RSL TRIAL	29

Executive Summary

Background

The Queensland Government is committed to ensuring there is an appropriate balance in the provision of gambling services. The Queensland Responsible Gambling Strategy focuses on three key priority objectives-

- prevention
- protection
- rehabilitation

Queensland has implemented proactive measures to minimise social problems and provide support for those individuals who encounter problems with the control of their gambling. The concept of pre-commitment, whereby players can pre-commit amount of time and/or money spend over a prescribed period of gaming machine play has been identified as a potential protection measure that could assist players to maintain control over their gambling behaviour.

The Queensland Government has now undertaken three trials of pre-commitment card-based gaming technology in Queensland to examine player attitude to pre-commitment as a control strategy.

Card-based gaming, also referred to as 'cashless' gaming, is a means of gaming whereby no physical notes or coins are used to play gaming machines. Card-based gaming provides the technical mechanism for offering pre-commitment limit setting features to gaming machine players. The technology available in Queensland allows participants to perform the following functions:

- deposit money into their card-based/cashless gaming account, insert their player loyalty card into a gaming machine and use the money in their account to play a gaming machine
- set a transfer limit (which is the maximum amount of money a patron can transfer from their cashless account to a gaming machine – the highest being \$100 (maximum limit per regulations)
- set a maximum account balance limit (which is the maximum amount of credit able to be stored on a player's cashless account)
- set a daily net expenditure limit (defined as the maximum daily net gain and loss by a player); and
- set a session time limit (the amount of time the player wishes to play on a gaming machine)(available only on one card-based gaming system in Queensland).

Pre-commitment card-based gaming strategically aligns with priority action area five of the Queensland Responsible Gambling Code of Practice ("ensure gambling environments are safe and more supportive for consumers").

The first trial of pre-commitment card-based gaming technology in Queensland was conducted from February to April 2005 at the Grandview Hotel, Cleveland. The technology allowed participants to set any of the following pre-commitment limits:

- maximum account limit
- transfer limit
- maximum transfer per day
- minimum time between each transfer
- session time limit
- daily/weekly expenditure limits.

The results from the Grandview Hotel trial assisted the government in evaluating whether a pre-commitment system is an effective consumer protection measure in terms of improving consumer control over gambling activities. The lessons learned from the Grandview trial were as follows:

- the high number of pre-commitment limits available on the card-based gaming system trialed were found to be too confusing by participants
- a user-friendly pre-commitment system and simple sign up process was imperative to success
- venue management and staff need to be strongly committed to the system to assist with uptake of card-based gaming and pre-commitment limits
- venue staff require significant training on the functionality and available limits on the system in order to competently train participants; and
- a flexibly regulatory approach is required.

Following the initial trial of card-based gaming technology featuring pre-commitment in 2005, further trials into pre-commitment using card-based gaming technology were undertaken. The venues, card-based gaming system and research periods for the trials were:

1. Sandgate RSL Club, eBet/Odyssey system, March to August 2008
2. Redcliffe RSL Club, SIMPLAY system, September 2008 to February 2009.

Methodology

The findings within this report have been extracted from the Schottler Consulting Report on the Sandgate RSL card-based gaming trial and Schottler Consulting Report on the Redcliffe RSL trial. Schottler Consulting was engaged by the Queensland Government to conduct qualitative market research on the impact pre-commitment card-based gaming has on player behaviour.

Whilst both Schottler Consulting reports were primarily qualitative, they did offer some minor quantitative analysis.

Results from the Schottler Consulting reports were drawn from a replication at each trial of the following research methodology:

- telephone surveys (approx 35-40mins) with card-based gaming players (respondents were asked to undertake Canadian Problem Gambling Index (CPGI) screening questions to determine their gambling risk)
- focus groups with card-based gaming players
- interviews with venue staff involved in card-based gaming
- interviews with staff of the system provider
- interviews with staff of the Licensed Monitoring Operator (LMO)
- spend analysis of system data provided by system provider/LMO.

In reviewing the findings from the card-based gaming trials, several caveats should be considered, including:

- player views represent perceptions only and hence may not have a factual basis
- there can often be a disconnect between player attitudes and behaviours
- the evaluation is not a systems technical or compliance evaluation and is primarily based on a human factors style evaluation of the system and its impacts
- the limitations of the evaluation need to be considered in the context of a relatively small sample of trial participants and the self-selection nature of the evaluation (i.e. only players who gave their consent to being contacted were able to be included)
- the gambling risk categories apply only to the telephone survey respondents and not to the entire group of trial participants.

Key Findings

Card-based gaming pre-commitment technology was well accepted by players who found the systems very easy to use. There was general support for card-based gaming to be a voluntary option for players and for limits to also be voluntary and individually-set.

Other key findings contained within the reports can be summarised into the following sections:

1. Uptake
2. Player experiences with card-based gaming
3. Harm minimisation issues
4. Venue experiences

1. Uptake

Key findings in relation to uptake of the card-based gaming product are as follows:

- uptake of card-based gaming at both trial sites required three to four months to peak with a steadying out of uptake after this period
- uptake of pre-commitment limit setting features by players was dependent on promotion of the availability of these limits by the gaming venue.

2. Player experiences with card-based gaming

Key findings categorised as relating to a player's experience with card-based gaming include:

- the sign-up process for both card-based systems was regarded as easy and straightforward
- players reported high levels of satisfaction with the overall functionality and usability of the systems
- players gave overall positive feedback about the card-based gaming play experience
- the majority of players felt the card-based gaming card encouraged them to think more about their expenditure and that using the card encouraged them to think about the affordability aspect of their pokies spending
- the majority of players found the 'convenience' aspect of card-based gaming as the major benefit over and above the availability of setting limits e.g. not having to wait for staff to perform cash-outs.

3. Harm minimisation issues

Any future rollout of card-based gaming to additional venues should have harm minimisation promoted as the primary objective of the technology offering.

The range of harm minimisation issues was many and varied. Key findings include:

- there is potential to further improve the level of harm-minimisation information supplied in written format to support card-based gaming
- higher-risk gamblers appear less likely to read printed information in the form of a brochure at the time of sign-up
- receiving warnings led people to think about their gambling spend
- players who received a warning as part of a pre-commitment limit were more likely to decrease their expenditure compared to players who set limits, but didn't receive warnings
- players who set a pre-commitment limit decreased their spending significantly more from pre to post implementation of card-based gaming compared to players who did not set a limit

- players who commit to their limits spend less than players who change their limits
- higher risk groups of players may be more likely to have decreased spending since uptake of card-based gaming compared to other lower risk groups
- generally, player interest in the concept of an additional weekly, monthly or annual limit was very low. Higher-risk gamblers were more interested in additional limits compared to lower-risk gamblers
- time limits are less important to most players compared to monetary limits
- expenditure statements were of low interest to players at both sites, but players acknowledged the usefulness of this option
- the format and presentation of information on player expenditure statements available through the SIMPLAY system needs improving.

4. Venue experiences

Key findings categorised as relating to the venue's experiences with card-based gaming include:

- venue staff reported positive experiences with card-based gaming and the usability of the card-based gaming product
- venue staff reported positive experiences with the support provided by the system suppliers. However, benefits of card-based gaming to the venue (Redcliffe RSL only) from an operational perspective were uncertain
- venue management commitment to pre-commitment was important for success of the systems
- simple and ongoing training for staff and detailed training for players by the system provider is imperative
- venue productivity gains are only achieved when a critical mass of players are using card-based gaming.

1.0 Trial information and research methodology

1.1 Sandgate RSL Club

In 2005, a small scale, preliminary trial of card-based gaming was undertaken at the Grandview Hotel, Cleveland.

In early 2008, approval was granted for a second trial of pre-commitment using card-based gaming to be conducted at the Sandgate RSL Club. The system provider was a partnership between Odyssey Gaming Technology (Odyssey), a Licensed Monitoring Operator (LMO) in Queensland, and eBet Ltd (eBet), a gaming systems developer. The card-based gaming system at Sandgate is colloquially referred to as 'eBet'.

The Sandgate trial research period was for six months from March to August 2008. Schottler Consulting were engaged to undertake primarily qualitative research into player behaviour resulting from the introduction of card-based gaming. The Office of Economic and Statistical Research (OESR) were contracted to perform quantitative analysis on any changes in gambling activity.

The total number of card-based gaming participants for the Sandgate trial was 66. Some 22 participants took part in the telephone survey and took the Canadian Problem Gambling Index (CPGI) screening test to determine their problem gambling risk.

1.2 Redcliffe RSL Club

In late 2008, approval was granted for a third trial of card-based gaming technology featuring pre-commitment at the Redcliffe RSL Club. This trial was conducted by the State's other LMO, Maxgaming. The system provided by Maxgaming is marketed via the product name 'SIMPLAY' and is unique in that the system provider, Maxgaming, was also the developer of this product. Schottler Consulting were again engaged to undertake primarily qualitative research into player behaviour resulting from the introduction of card-based gaming.

To aid comparative analysis, the Redcliffe trial research period was also for six months and was conducted between September 2008 and February 2009, although the trial began in August 2008.

The total number of card-based gaming participants for the Redcliffe trial was 341 of which 32 participated in the telephone survey and took the CPGI screening test.

1.3 Research methodology

The findings within this report have been extracted from the Schottler Consulting Report on the Sandgate RSL trial and Schottler Consulting Report on the Redcliffe RSL trial.

Whilst both Schottler Consulting reports were primarily qualitative, they did offer some minor quantitative analysis. The OESR report for Sandgate was purely quantitative. There was no corresponding OESR report commissioned for Redcliffe.

Results from the Schottler Consulting reports were drawn from a replication at each trial of the following research methodology:

- telephone surveys (approx 35-40mins) with card-based gaming players
- focus groups with card-based gaming players
- interviews with venue staff involved in card-based gaming
- interviews with staff of the system provider
- interviews with staff of the Licensed Monitoring Operator (LMO)
- spend analysis of system data provided by system provider/LMO.

It is important to note that only after demonstration of adherence to a significant number of technical and regulatory standards is a trial approved at a field site.

2.0 Caveats

In reviewing findings of the current card-based gaming trial evaluation, several caveats should be considered:

- player views represent perceptions only and hence may not have a factual basis
- there can often be a disconnect between player attitudes and behaviours
- the evaluation is not a systems technical or compliance evaluation and is primarily based on a human factors style evaluation of the system and its impacts
- the limitations of the evaluation need to be considered in the context of a relatively small sample of trial participants and the self-selection nature of the evaluation (i.e. only players who gave consent to be contacted were able to be included) and problem gambling risk factors only apply to telephone survey respondents.

3.0 Report structure

This summary report collates information extracted from the Schottler Consulting reports mentioned previously. Within this context, the key findings of the card-based gaming trial are presented as follows:

- uptake
- player experiences with card-based gaming
- venue experiences with card-based gaming.

4.0 Uptake

This section reports on the uptake of card-based gaming by gaming machine players at each trial site and uptake of pre-commitment limit setting features.

4.1 Analysis of uptake of card-based gaming

Interestingly, both trials experienced similar rates of uptake of card-based gaming during the trial as evidenced in the table below. Both trial site experiences show that uptake of card-based gaming was by no means immediate.

Month	Sandgate Players	% total card players	Cumulative %	Redcliffe Players	% total card players	Cumulative %
One	15	23	23	155	45	45
Two	13	20	43	35	10	56
Three	31	47	90	41	12	68
Four	2	3	93	40	12	79
Five	2	2	95	20	6	85
Six	3	5	100	27	8	93
Seven				12	4	97
Eight*				11	3	100
Total	66	100		341	100	

*Actual research period at Redcliffe RSL was eight months

Sandgate had 90% of the total participants enrolled in the trial after the third month ((May 2008). Similarly, Redcliffe had the vast majority of participants enrolled in the trial (79%) after the fourth month (November 2008).

Sandgate RSL actively tried to promote the card-based gaming product to players and actively tried 'recruiting' players to sign-up through direct approaches to individuals. This involved a staff member standing at the door greeting individual club members who were attending the venue to play pokies.

At Redcliffe RSL, a number of promotional processes were needed to stimulate uptake of card-based gaming in players. Methods offered by the venue to promote SIMPLAY included:

- offering a \$20 sign-on incentive in SIMPLAY points
- Maxgaming offered to SIMPLAY users the chance to win in a \$500 weekly draw (which was limited to SIMPLAY users and ran for 10 weeks during the trial) (although reports from the venue tended to suggest that the \$500 weekly draw was not a major incentive for participation)
- Maxgaming placed six staff on site to sign-up players during the trial (an early phase)
- Redcliffe RSL promoted the availability of card-based gaming through a written letter/promotion to club members.

Finding: *Market uptake for the introduction of card-based gaming at a gaming venue requires approximately three to four months to peak.*

Finding: *Early trials will require significant effort to encourage adoption to achieve the objectives of pre-commitment as a gambling harm-minimisation measure.*

4.2 Uptake of pre-commitment limit setting features

At Redcliffe RSL, only 13% of participants in card-based gaming opted to set a daily spend limit (the rest opting for just cashless gaming alone). Most players set fairly conservative limits with the maximum limit set of \$100.

At Sandgate RSL, 28% of players opted to set a daily spend limit - a total of 18 of 64 players (despite benefits being actively promoted by venue staff). Daily spend limits set by players were relatively conservative – N=11 limits were set at \$50, N=9 limits were set at \$100 and N=3 limits were set at under \$50 (Note - this does not add to total players as four players changed their limits and one further player did not set a limit on sign-up, but then elected to set a limit later).

Despite significant effort on the part of both venues and system suppliers to promote pre-commitment limit setting features of the card-based gaming systems, adoption of these limits was by no means immediate.

Schottler Consulting has noted that uptake and use of pre-commitment will only be as high as can be driven by the venue through venue promotions and the commitment of a venue to the pre-commitment benefits of card-based gaming.

It is also possible that the sign-up process for card-based gaming had some influence on uptake of pre-commitment limits due to differing levels of staff interaction at both trial sites on sign-up. At Sandgate RSL, participants were required to fill out a physical form to engage in cashless gaming with the assistance of a venue staff member. Participants were informed of the benefits of setting pre-commitment limits on sign-up by the venue staff member.

At Redcliffe RSL, players could sign-up to card-based gaming by swiping their club card at the SIMPLAY kiosk and navigating through a series of screens, one of which lists the various pre-commitment limits that a player may wish to set. The set-up process for card-based gaming at each site is outlined in more detail in section 5.1 below.

The Schottler Consulting report into the Redcliffe RSL trial noted that while the information contained in the Maxgaming player brochures about the SIMPLAY system contained much content on the system functionality, there was very limited information available to help inform players about the choice of limits or the benefits for setting limits. Focus groups also showed that many players were quite confused about the preferences for set-up during the initial card set-up process and most were not cognisant of the preferences and limits they had selected.

Such findings suggest that provision of clearer information and explanation about the card and parameter settings is important for players and direct support from venue staff will be essential for encouraging card adoption and for realising the card's harm minimisation benefits. Information supplied in gaming brochures is generally unlikely to be used when a player is signing up to card-based gaming via a kiosk screen.

Finding: *Uptake and use of pre-commitment will only be as high as can be driven by the venue through venue promotions and training.*

5.0 Player experiences with card-based gaming

This section reports on key attitudinal insights of players from an administered survey and focus groups for both trials. The sub-sections for this section of the report include:

- ease of set-up of card-based gaming and provision of player information
- player experiences with card-based gaming
- player experiences with limits and warnings.

5.1 Ease of set up of card-based gaming and provision of player information

Overall, players with both eBet and SIMPLAY reported set up procedures as being relatively easy and in no way onerous. Interestingly, the set up procedures were distinctly different. Both systems used either existing membership cards or a new version of the club's membership card as the card-based gaming card. Both sign-up processes were supported with a range of printed material to assist the participants with additional information or explanation if needed.

eBet players at Sandgate RSL were required to complete a number of forms to sign up for card-based gaming and to set, if desired, limit parameters. It was reported that the process took approximately 10 minutes and 68% of players 'strongly agreed' and 32% 'agreed' that the set up process was 'easy and straightforward'. Upon sign up players were given a new membership card which was identical to their previous card except for the presence of a card-based gaming logo.

With regards to the brochure supplied at Sandgate during sign up, the table below outlines the level of readership.

How much of the information was read	% of recreational gamblers (n=13)	% of high-risk gamblers (n=9)	% Overall (n=22)
Not at all	0	22	9
Read a little	15	11	14
Read most of it	85	67	77

Based on CPGI risk segmentation, there appears a slight trend for high-risk players at Sandgate RSL to be marginally less likely to read the supplied information.

The Redcliffe SIMPLAY registration was different to Sandgate insofar as players were not required to fill out any paper work but merely swipe their existing membership card at the SIMPLAY kiosk to sign up. It was reported that the process took approximately 30 seconds with 100% of participants agreeing that the sign-up process was easy and straightforward. From a player perspective the efficient sign-up process was seen as an important feature toward enhanced usability.

As with Sandgate, the Redcliffe RSL participants also received a brochure containing further information on the system and the limits available. Findings from the survey as to the level of readership are outlined in the table below.

How much of the information was read	% of recreational gamblers (n=11)	% of high-risk gamblers (n=21)	% Overall (n=32)
Not at all	0	6	6
Read a little	17	33	25
Read most of it	83	61	69

As with the Sandgate findings, based on CPGI risk segmentation, there appears a slight trend for high-risk players at Redcliffe RSL to be marginally less likely to read the supplied information.

At the Sandgate trial, 77% of players agreed the written information provided about the new gaming card by the system supplier clearly explained card based gaming with 77% of players indicating they had read most of the material. 95% of players recall receiving written information prior to sign-up.

At the Redcliffe trial, 90% of players agreed the written information provided about the new gaming card clearly explained card based gaming with 69% of players indicating they had read most of the material. 72% of players recall receiving written information prior to sign-up. While the written information supplied by the system provider at the Redcliffe RSL contained much information on the card-based gaming functionality, very limited information was available to help inform players about the choice of limits or the benefits for setting limits. Many participants said that the written information could be improved, with the print and format of the brochure being seen as 'difficult to read' and understand.

Both sign up procedures were expedited to a large degree by the fact that the trials were being held at clubs with all participants already being signed up as members. Less onerous identification requirements (compared to 2005) were able to be applied in 2008, given the enactment of the new Anti-Money Laundering and Counter-Terrorism Financing Act (AML-CTF) in late 2006.

Finding: *Set-up of the card-based gaming systems was viewed as easy and efficient by card-based gaming players.*

Finding: *An automated sign-up process appears to be significantly more acceptable than form completion by players and should be encouraged as a potential mechanism to encourage players to sign-up for card-based gaming and pre-commitment.*

Finding: *There is potential to further improve the level of harm-minimisation information supplied in written format to support card-based gaming.*

Finding: *Higher-risk gamblers appear less likely to read printed information in the form of a brochure at the time of sign-up.*

5.2 Player experiences with card-based gaming

Across both trials, findings highlight positive player feedback about the usage experience and the overall usability of the card-based gaming product.

At the Sandgate trial, findings highlight that after six months of card usage:

- 95% of players felt confident using card-based gaming
- 86% felt confident using the card after the first day of use
- 100% found the sign-up process easy and straightforward
- 58% felt that the card encouraged them to think more about their expenditure
- 45% felt that playing with the card encouraged them to set a spend limit for pokies play, compared to regular cash-based gaming
- 45% felt that using the card encouraged them to think more about the affordability aspect of their pokies spending.

Participants at the Sandgate RSL trial cited the convenience of cashless gaming as the main benefit (i.e. not having to use cash/coins), along with not having to wait for pay-outs or hopper refills. While harm minimisation benefits were not seen as the main overall benefit, a number of players emphasised the benefits of being able to see the card balance (i.e. what has been spent) and saw pre-commitment as a benefit.

Whilst small samples make it difficult to assess statistically significant trends, further findings from Sandgate suggest that, relative to lower-risk recreational gamblers, the higher-risk gamblers more strongly agreed that the card:

- encouraged them to think more about their pokies expenditure, compared to regular cash-based gaming
- encouraged them to think about how much they can afford to spend on pokies play, compared to regular cash-based gaming
- encouraged them to think more about the amount of time they spent playing the pokies, compared to regular cash-based gaming.

In contrast however, higher risk gamblers did not differ from recreational gamblers in terms of whether the card more actively encouraged them to set a spend limit for pokies play, compared to regular cash-based gaming.

Redcliffe findings indicate that all participants were quite happy with the benefits and ease of use of the SIMPLAY gaming card. Most players saw some level of benefit in SIMPLAY and particularly liked the convenience of card-based, or cashless, gaming. Indeed, consistent with the Sandgate trial results, cashless gaming was viewed overall as the single major benefit of card-based play.

Apart from 'cashless convenience', Redcliffe players admired the ability to move around from machine to machine more efficiently, being able to transfer small amounts back to the card and the benefit of not having to wait for hand-pays as a result of larger wins. Not having to wait for staff was also seen as particularly useful in helping players plan their time and other activities.

While a small number of players raised as a benefit the potential value of pre-commitment limits on SIMPLAY, it was quite apparent that few players saw this as the major benefit of the product. When asked whether the use of the gaming card affected their pokies play, the following responses were received:

- card did not affect play (x12)
- card assisted them better manage expenditure (x8)
- general convenience (x8)
- easy moving from EGM to EGM (x6)
- not having to wait for hand pays (x5)
- availability of pre-commitment (x2).

In summary, while the gaming spend limit received some level of interest from players, there was generally seen to be more perceived value in the benefits offered by cashless gaming at both trial sites.

Other findings of relevance from the Redcliffe RSL trial show:

- 96% of players felt confident using card-based gaming
- 82% felt confident using the card after the first day of use
- 57% felt that the card encouraged them to think more about their expenditure
- 67% felt that playing with the card encouraged them to set a spend limit for pokies play, compared to regular cash-based gaming
- 52% felt that using the card encouraged them to think more about the affordability aspect of their pokies spending.

Finding: *Players reported high levels of satisfaction with the overall functionality and usability of the systems.*

Finding: *The majority of players felt the card-based gaming card encouraged them to think more about their expenditure and that using the card encouraged them to think about the affordability aspect of their pokies spending.*

Finding: *The majority of players found the 'convenience' aspect of card-based gaming as the major benefit over and above the availability of setting limits.*

Finding: *Given that many players just use card-based gaming for 'cashless convenience', findings of this trial further emphasise the need for venues to actively promote harm-minimisation benefits to ensure that they are leveraged by players.*

5.3 Player experiences with limits and warnings

Learning from the first trial in 2005, where the large number of available limits proved confusing for participants, both the Sandgate and Redcliffe trials only had a small number of pre-commitment limits available to participants.

1. Daily Net Expenditure Limit

A net expenditure limit offers participants the ability to set a pre-determined amount of expenditure per day that when reached, will render the card inoperable until the following trading day.

2. Maximum Account Balance Limit

A maximum account balance limit allows participants to set a pre-determined amount which can be held on the card (account) at any one time. If the maximum account balance limit has been reached or exceeded the card is not able to be used until the account balance has been reduced to a limit under the maximum account balance limit.

3. Transfer Limit

The transfer limit offers participants the ability to set a pre-determined amount that can be transferred to a gaming machine from the card during a gaming session. A gaming session is defined as the period between a player inserting their card into the machine, playing the gaming machine and subsequently removing their card.

4. Session Time Limit (SIMPLAY system only)

The session time limit allows a participant to set a limit on the amount of time they can play a gaming machine in a gaming session.

All players at sign-up had the option of setting a limit. Once a limit was set, any request to increase the limit could only become operable the next trading day. Any request to decrease the limit must be made immediately.

At the Sandgate trial, despite some very minor confusion over balance and transfer limits, players generally had a significantly better understanding of the available limit options compared to that of the first trial in 2005. The simplicity of the eBet product design was viewed as a key strength in this regard.

The following table outlines the limits set by Sandgate players after sign-up:

CPGI risk category	Player	Net expenditure limit (\$)	Locked balance limit (\$)	Transfer limit (\$)
Non-problem gamblers	1	No limit set	No limit set	No limit set
	2	no limit	No limit set	No limit set
	3	50	Didn't recall	50
	4	20	No limit set	No limit set
	5	30	50	Didn't recall
	6	30	No limit set	Didn't recall
			<ul style="list-style-type: none"> 4 out of 6 set limits mostly small limits 	<ul style="list-style-type: none"> limit not very meaningful to players
Low risk gamblers	1	100	No limit set	Didn't recall
	2	100	50	Didn't recall
	3	Didn't recall	Didn't recall	No limit set
	4	40	50	10
	5	50	1000	50
	6	300	1000	100
	7	No limit set	No limit set	No limit set
		<ul style="list-style-type: none"> 5 out of 7 reported setting a limit 	<ul style="list-style-type: none"> limit not very meaningful to most players 	<ul style="list-style-type: none"> 3 players reported a transfer limit
Moderate risk gamblers	1	No limit set	Didn't recall	20
	2	Didn't recall	1000	100
	3	No limit set	Didn't recall	Didn't recall
	4	100	Didn't recall	Didn't recall
	5	Didn't recall	Didn't recall	Didn't recall
	6	Didn't recall	1000	100
	7	60	60	60
	8	No limit set	Didn't recall	Didn't recall
		<ul style="list-style-type: none"> 2 out of 8 players reported a limit 	<ul style="list-style-type: none"> most didn't recall the card balance 	<ul style="list-style-type: none"> most didn't recall the transfer limit
Problem gamblers	1	100	500	50
		<ul style="list-style-type: none"> Only known problem gamblers set \$100 limit 	<ul style="list-style-type: none"> \$500 card balance was set 	<ul style="list-style-type: none"> Problem gambler chose a \$50 transfer limit

Players at Sandgate were asked to make comment not only on whether they had received warnings during card-based gaming, but also the impact of those warnings on the extent to which players adhered to their pre-commitment limits.

In regards to whether Sandgate players received warnings or not, 44% of higher-risk gamblers and 69% of recreational gamblers reported receiving no warnings during card-based play. Due to their more frequent patterns of play, higher-risk gamblers would naturally receive more warnings.

The warnings triggered through card-based play (on reaching daily expenditure limit) were seen by most players at Sandgate as quite useful.

Specific results regarding player views about the impact of warnings during the Sandgate trial are as follows:

- 63% of participants agreed receiving warnings made them think about the time they were spending on the pokies
- 88% of participants agreed receiving warnings helped them to keep to their individual gambling spend limit
- 88% of participants agreed receiving warnings made them think about whether they could afford to gamble more
- 88% of participants agreed receiving warnings made them think about their gaming expenditure.

It was also apparent that higher-risk gamblers were generally more likely to be triggered to think more about their gaming affordability, limits and spending when a warning occurred (even about time spent gambling for that matter).

At Redcliffe, 67% of players that did set limits reported receiving a 'limit exceeded' warning during use of their SIMPLAY card. As per the figures outlined in the table below, findings showed that players who received a warning were more likely to decrease their expenditure during the SIMPLAY trial, compared to players who set limits, yet did not receive warnings. This may highlight some potential role of warnings in assisting players to adhere to pre-commitment limits.

Mean expenditure before and following SIMPLAY		
	No Warning	Received a Warning
Mean SIMPLAY spend for same 6mths as the trial but in 07-08	\$76.98	\$255.38
Mean SIMPLAY spend as a single variable across all players	\$108.85	\$201.54
Mean change since implementation of SIMPLAY	\$31.87	\$53.84
% change in expenditure since implementation of SIMPLAY	+41.4%	-21.2%

Finding: Receiving warnings led people to think about their gambling spend.

Finding: Players who received a warning as part of their limit were more likely to decrease their expenditure compared to players who set limits, but didn't receive warnings.

The findings across both trial sites show the significant effect the setting of pre-commitment limits can have on gaming machine expenditure.

At Sandgate RSL, a comparison of players (who did and did not set a limit) revealed that players who did set a limit decreased their spending significantly more (5.2%) from pre to post implementation of card-based gaming compared to players who did not set a limit. In particular, nett daily spend of players who set a limit decreased from \$64.02 to \$39.26 spend per player per day, while daily spend of players who did not set a limit only decreased from \$53.26 per player per day to \$51.90. While it is difficult to solely attribute this to card-based gaming, it may be a likely influence.

At Redcliffe RSL, players who set a limit decreased their spending by 8.2% while players who did not set a limit increased their spending by 5.6% - players who did not change their limit also tended to spend less than players who constantly changed their limit. Player expenditure pre and post SIMPLAY expressed as a function of whether people (who set limits) changed their limits during the trial period are shown in the table below.

Spend Comparison		
	Didn't Change Limit	Changed Limit
Mean SIMPLAY spend for same 6mths as the trial but in 07-08	\$214.10	\$50.40
Mean SIMPLAY spend as a single variable across all players	\$198.20	\$74.20
Mean change since implementation of SIMPLAY	\$15.90	\$23.80
% change in expenditure since implementation of SIMPLAY	- 7.4%	47.2%

The Redcliffe RSL trial results also show that the higher risk group of players was more likely to have decreased spending since uptake of card-based gaming, compared to other lower risk groups. This may also be a reflection of different income levels or other factors, but nevertheless presents some interesting trends for consideration. This trend is shown in the table below.

Change in expenditure since implementation of SIMPLAY (Baseline: Same period 07-08)	% Players	
	Non-problem and low risk gamblers	Moderate risk and problem gamblers
-\$10,000 to -\$1 (Spent less)	26	44
\$0 through to \$10 (about the same expenditure)	5	0
\$11 through to \$50 more (somewhat more)	11	12
\$51 through to \$100 more (quite a bit more)	16	12
\$101 through to \$500 more (a lot more)	16	25
More than \$500 more (significantly more)	26	6

Out of a total of 50 players surveyed, the reasons reported for not setting a limit at the Redcliffe RSL were:

- No particular reason/don't know (x23)
- Like freedom/independence (x8)
- Don't gamble very frequently (x5)
- Spending under control (x3)
- Don't need a limit (x3)
- Unaware of limits (x2)
- Psychological limit anyway (x2)
- Couldn't be bothered (x1)
- Reference to transfer amount (x1)
- Card allowed a type of pre-commitment anyway (x1)
- Never considered a limit (x1).

While convenience was generally seen as the major benefit of card-based gaming for players at Redcliffe, there was some evidence that a small proportion of players benefited from the ability of the card to encourage pre-commitment. It appeared however, that this was generally less to do with the programmable card-based gaming limit and more to do with the value of having a card to help keep track of poker machine spending.

In this respect, many players referred to their 'mind limit' or 'psychological limit' and made comment about how the card supported consideration of this limit during gaming. Some players also referred to the ability of the card to encourage players to plan their future spending.

With regards to players contemplating increasing their daily expenditure limit, 100% of players responding to the survey at Sandgate reported never thinking about increasing their daily limit. A further analysis of eBet systems data showed that only four players increased their card limit during the trial and one of this same group of players also decreased their card limit following an earlier increase.

Generally, player interest in the concept of an additional weekly, monthly or annual limit was very low. Interestingly though, the high-risk gamblers were more so interested in additional limits, compared to lower-risk gamblers. Indeed 44% of higher-risk gamblers were 'quite' or 'somewhat' interested, compared to only 23% in total for recreational gamblers. This matter was not examined at Redcliffe RSL.

Card-based gaming had a much lesser impact on player inclination to think about the time spent on the pokies. This further suggests that time limits are less important to most players.

Finding: *Players who did set a limit decreased their spending significantly more from pre to post implementation of card-based gaming compared to players who did not set a limit.*

Finding: *Players who commit to their limits spend less than players who change their limits.*

Finding: *Higher risk groups of players may be more likely to have decreased spending since uptake of card-based gaming, compared to other lower risk groups.*

Finding: *Generally, player interest in the concept of an additional weekly, monthly or annual limit was very low. Higher-risk gamblers were more interested in additional limits compared to lower-risk gamblers.*

Finding: *Time limits are less important to most players compared to monetary limits.*

Expenditure statements were confirmed by Sandgate staff as being of low interest to the players and reported no requests for statements during the trial period. Most players did not believe they needed to track their spending to that level, but believed it was a good option for other players.

At Redcliffe, print outs showing gaming machine expenditure were able to be accessed by players at the SIMPLAY kiosk. However, most players admitted that they had not been very interested in their expenditure, rather, were interested to 'try out' the printing process. For many, usage of the printer was primarily for 'curiosity'. A small number of players had found it useful being able to access their expenditure history via the kiosk.

The results from the evaluation at Redcliffe RSL highlighted that most players could not interpret the design of the expenditure statements accessible from the SIMPLAY kiosk or from venue staff behind the counter. In particular 'labelling' was confusing and terms such as 'draw up' and 'draw down' have no or limited meaning to players. Results also showed that the:

- menu on the kiosk for accessing statements could be made clearer
- availability of more detailed statements from behind the counter could be made clearer (players and staff were unaware of this)
- presentation of statements from behind the counter could be improved (currently on three fragmented pieces of thermal roll).

Findings: *Expenditure statements were of low interest to players at both sites, but players acknowledged the usefulness of this option.*

Findings: *The format and presentation of information on player statements available through the SIMPLAY system needs improving.*

Sandgate players were asked their views on the cooling off period, whereby any requests for limits to be decreased were only implemented only after 24 hours (or the next trading day). As reported in the survey results, 64% of players supported this design feature with minimal differences observed across higher-risk and recreational gamblers.

Sandgate players were also surveyed as to whether they had reverted back to regular gaming, without the card, and what was the reason for this. Whilst some players self-reported that they had reverted back to normal cash-based play, the main reason for this was 'the card ran out of money' (42% of players reverting back to regular gaming) followed by a problem with the card (33%). In contrast, only 8% of players stopped using their card simply because they wanted to stop the warnings. Interestingly, however, higher-risk gamblers were generally more likely to report this as a reason (14%), compared to recreational gamblers (0%).

6.0 Venue experiences with card-based gaming

Sandgate RSL

Staff were interviewed during September 2008 to better understand venue experiences of the trial. It was apparent during the trial that the venue was highly committed to the concept of pre-commitment and valued the trial as a way of providing better service and 'protection' for members. From an implementation perspective, venue staff were very pleased with the level of support and professionalism offered by Odyssey (LMO) and eBet (systems provider) in supporting both staff training and system implementation. Management's commitment to the trial assisted in this regard.

Despite some early technical hitches, all staff had a favourable view of the card-based gaming system and rated the overall experience as either 'good' or 'very good'.

While difficult to validate on objective evidence, there was a perception from venue staff that problem gamblers were unlikely to uptake the system and some suspicion that 'big punters' at the venue did not seem interested in participating in the trial due to the player's perception of being 'tracked'.

Redcliffe RSL

From a staff and venue perspective, the Redcliffe RSL had relatively positive experiences of the card-based gaming system and implementation. It was apparent, however, as with all trials, that a range of implementation issues were experienced during the early phases of the trial. These were reported as having led to some player frustration during the trial and some players 'giving up' on the system, during the early post-implementation phase.

In respect to promoting card uptake, staff were instructed to, where possible, target the 'more regular' players. However many of the players were reported to be 'affluent and disinterested' in the concept of pre-commitment. From this perspective, many staff reported difficulty convincing players to take up the pre-commitment aspect of card-based gaming. This opinion was supported by comments made by the system supplier who also reported that pre-commitment had been a difficult benefit to sell and is reflected in the actual numbers of players which took up pre-commitment limits at Redcliffe RSL (13% of participants).

Staff also reported an overall view that most players saw convenience as the major benefit of card-based gaming and in particular the ability to move around gaming machines more efficiently. However, very few players, if any, were reported by staff to see major benefits in the ability to set pre-commitment limits.

There was an overall view that the implementation process associated with card-based gaming was quite seamless for the venue, despite some technical glitches in the early phase of the trial. Ease of implementation was generally attributed to the system supplier taking full responsibility for the entire implementation process. In addition, the absence of major hardware changes to implement card-based gaming also implied that there was minimal disruption to the venue.

During the early phase of the trial, operational gaming staff reported the training was 'confusing', given the steep learning curve associated with the new system and new procedures. It was also apparent that early difficulties were primarily due to a few changes made to the system during the earlier phase of the trial.

One training-related issue, or lack of training issue, was that most venue staff were not aware of the availability of expenditure statements 'behind the counter' in addition to those offered through the SIMPLAY kiosk. Similarly it was apparent that some, if not most players, were not given information on the availability of more detailed expenditure statements.

Redcliffe RSL management generally reported being 'at two minds' about the benefits of card-based gaming at the venue. There had been an initial expectation that the system would lead to major productivity gains for staff and particularly, a reduction in time spent on hopper refills, hand-pay/cancel credit requests and other processes. Since implementation however, venue management was not overly convinced that significant 'productivity gains' would be achieved through card-based gaming.

Finding: Venue staff reported positive experiences with card-based gaming and the usability of the card-based gaming systems.

Finding: Venue staff reported positive experiences with the support provided by the system suppliers. However, benefits of card-based gaming to the venue (Redcliffe RSL only) from an operational perspective were uncertain.

Finding: Venue management commitment to pre-commitment was important for success of the system

Finding: Simple and ongoing training for staff and detailed training for players by the system provider is imperative.

Finding: Venue productivity gains are only achieved when a critical mass of players are using card-based gaming.

7.0 Future directions for card-based gaming

As part of the Sandgate focus groups, participants were asked to provide views on future directions for card-based gaming. Interestingly, most players saw some benefit in venues offering card-based gaming as an option for players, yet most people did not want to see it compulsory.

From the Sandgate results 68% of players believed that it should be offered as a voluntary option and only 5% saw no reason for venues to offer card-based gaming. A further 27% also felt that compulsory use may be warranted. This was also more strongly supported by higher-risk gamblers (33%) compared to recreational gamblers (23%).

Redcliffe players generally saw high potential for further applications of SIMPLAY at other venues and there was, additionally, interest in the ability to roll-out SIMPLAY across a wide-area network of clubs. However, there was generally strong reaction against the concept of compulsory limits for gaming and support for the concept of individually-set limits.

Whether card-based gaming should be made compulsory for players was also explored in the Redcliffe survey. Interestingly 27% of non-problem gamblers thought the cards should be made compulsory which appeared to be higher than the other higher-risk segments.

Finding: There is general support for card-based gaming to be a voluntary option for players and for limits to also be voluntary and individually-set.

The eBet/Odyssey and Maxgaming SIMPLAY system have now been approved for further roll-out to gaming venues in Queensland for adoption by gaming venues on a voluntary basis and with players able to set pre-commitment limits voluntarily.

The roll-out of pre-commitment card-based gaming in Queensland will be monitored and an evaluation of its ongoing effectiveness as a harm minimisation and consumer protection measure will be undertaken when a larger number of venues take up the technology.

APPENDIX A – SCOTTLER CONSULTING KEY FINDINGS FROM THE SANDGATE RSL TRIAL

Key findings of the evaluation of the card-based gaming system at Sandgate RSL included:

Key Findings	Description of Key Findings	Implications
<p>Finding 1. Findings showed that uptake of card-based gaming was not immediate and require active venue promotion.</p>	<p>Findings showed that uptake of card-based gaming by venue patrons required approximately three months. In relation to uptake of card-based gaming, findings showed that:</p> <ul style="list-style-type: none"> • 23% of patrons took it up in the first trial month • 20% of patrons took it up in the second trial month • 47% of patrons took it up in the third trial month <p>This was also in the context of the venue actively trying to promote the product to players and actively 'recruiting' players to sign-up through direct approach to individuals. This involved a staff member standing at the door greeting individual club members who were attending the venue to play pokies. In total, approximately 66 patrons took up the product from trial commencement in March 2008 through to early September.</p>	<p>Findings of the current research further highlight that pre-commitment and card-based gaming will require active venue promotion to ensure optimal uptake of the product by patrons. Uptake and use of pre-commitment will only be as high as can be driven by the venue through venue promotions.</p>
<p>Finding 2. Set-up of the card-based gaming card was viewed as easy and efficient by card-based players.</p>	<p>Unlike the first pre-commitment trial where sign-up to card-based gaming was viewed as extremely onerous (as passports and drivers licences had to be photocopied for 100 points ID), players held a view that the set-up and sign-up process for card-based gaming was easy and straightforward. A new sign-up approach was also possible, given the recent legislative change to the Anti-Money Laundering and Counter-Terrorism Financial Act in December 2006. This new legislation requires reporting entities to adopt a 'risk-based' approach to regulation (risk implying whether a service has potential to facilitate money laundering or terrorism financing). In this context, this new approach was possible as card-based players were limited to patrons who were already members of the club. Patron comments about the set-up process included:</p> <ul style="list-style-type: none"> • <i>It was very easy. Straightforward and no problems.</i> • <i>It certainly wasn't enough to put me off playing. You just had to fill out a form or so. It wasn't much of a big deal.</i> • <i>I didn't have any problems at all. It was pretty quick.</i> <p>Findings also suggested that most players (91%) supplied written information about the functioning of card-based gaming read the supplied information.</p>	<p>Findings of the current research confirm that less intrusive sign-up processes for card-based gaming are much more acceptable to players.</p> <p>This also highlights that a card-based trial in a hotel context (where there may not always be a pre-existing loyalty program) would be a useful way to confirm the acceptability of card-based gaming to the hotel patron market.</p>

<p>Finding 3. Players reported high levels of satisfaction with the overall functionality and usability of the eBet card-based gaming product.</p>	<p>Findings of research showed that virtually all surveyed players using the eBet card-based gaming product reported high satisfaction with the overall usability and functionality of the product. In particular, 90% reported remembering PINs as very easy, 81% reported transferring money from the EGM to the card as very easy and 76% found transferring money from the card to EGM as very easy. Small percents also reported the same dimensions as easy, suggesting high product usability.</p> <p>Findings of usability testing with players who had not used the card (hence minimising potential for practice-effects) also highlighted that most players found the product easy to grasp after a short initial 'training session'.</p>	<p>The eBet product addresses many of the functional requirements specified from the first pre-commitment trial (particularly a single simple limit).</p> <p>The key to the successful usability of the product appears to be the simplicity of a single main limit (a nett daily spend limit) and a simple approach to money transfers to/from the EGM.</p> <p>It is also apparent that strong venue commitment to the trial and quality training of players contributed significantly to the overall player product experience.</p>
<p>Finding 4. Players gave positive overall feedback about the card-based gaming play experience.</p>	<p>Findings of the card-based player survey highlight that players expressed high satisfaction and enjoyment with the card-based play experience. Despite a few early technical and usability issues, player confidence in the product was very high and players felt reassured about the safety of their money on the card.</p> <p>Reflecting this, 72% of players believed the gaming card helped them enjoy the pokies more than regular gaming and players cited the convenience of cashless gaming as the main benefit (i.e. not having to use cash/coins), along with not having to wait for pay-outs or hopper refills. Illustrative comments included:</p> <ul style="list-style-type: none"> • <i>I think it's a great idea. It's brilliant. I used to win and a lady would have to bring the money out. Now it's a form of saving. Like a credit card or the same principle.</i> • <i>It's good you don't have to wait for pay-outs. You'd be waiting a while and then the club bus would arrive and you'd worry about missing it waiting for a pay-out.</i> • <i>I like that you don't have to wait for that last cent. You just take out your card and it zaps the money off.</i> • <i>Convenience is a big benefit. You win \$150 and then you have to wait for a gaming person and so you miss the club's free bus. But with cards, you can take it and go.</i> • <i>I like that your fingers don't turn black. It's also convenient not having to wait for a pay out (Female player)</i> <p>While harm-minimisation benefits were not seen as the main overall benefit, a number of players emphasised the benefits of being able to see the card balance (i.e. what is spent) and pre-commitment as a benefit. Comments about harm-minimisation benefits included:</p> <ul style="list-style-type: none"> • <i>I think we've saved a lot from having the card. It just keeps you focused within the session. Like how much</i> 	<p>Findings of research highlight that players see the primary benefit of card-based gaming as the convenience of cashless play (particularly no waiting and no handling of cash) and ease of monitoring spending and limits as secondary benefits.</p> <p>Given that many players just use card-based gaming for 'cashless convenience', findings of this trial further emphasise the need for venues to actively promote harm-minimisation benefits to ensure that they are leveraged by players.</p> <p>This is particularly important in view of evidence to suggest that players with higher-risk for problem gambling may see more benefit in the ability of card-based gaming to assist in monitoring expenditure and the affordability of gambling.</p>

	<p><i>you've spent. We also like leaving money on the card for next time. It's like saving to plan for future entertainment. It's also good because you can save money for next time and not get hit when the bills comes in.</i></p> <ul style="list-style-type: none"> <i>• I put mine in \$10 lots, so I think it did help me a bit. (reference to the transfer limit)</i> <i>• When staff bring out 20 bucks to pay you out, you do feel inclined to spend it. But if it's a \$50, it's a whole different thing. So the card helps you. With \$50, you take it to the counter and ask to split it up. So in a way, the cards avoid you overspending.</i> <i>• It's a lot easier monitoring spending on the card. If I feel I'm spending too much, I ramp the transfer amount down, especially if I'm feeling I'm going too close. When I get that message 'you are now approaching your limit' or whatever, I think I better pull out the card.</i> <i>• If you have limits, you have better control over your spending. I'm a pensioner and I've got a limit of \$50 and then once I reach it, I give it away.</i> <i>• With the card, it seems to draw your attention to it. It makes you think overall. I'm glad they've brought it in.</i> <p>Findings of the player survey also suggested that 58% felt that the card encouraged them to think more about their expenditure and 45% felt that using the card encouraged them to think more about the affordability aspect of their pokies spending. It was also apparent that higher-risk players (as measured by the CPGSI) were even more likely to think this than lower-risk recreational players.</p>	
<p>Finding 5. Complex analysis of 21,310 EGM play transaction records highlights some interesting player behaviour in response to card-based gaming.</p>	<p>As part of the card-based gaming trial, 21310 play transactions were analysed for the 64 card-based players using raw play transaction data supplied by eBet. This complex and very involved exercise showed a number of interesting insights into player use of card-based gaming and player behaviour during card-based gaming.</p> <p><i>As it is not possible to draw definitive conclusions (as there was no way of tracking card-based play from non-card play just using the loyalty card), findings should be considered indicative with limitations of this analysis and small sample considered.</i></p> <p>Supporting the comprehensiveness of the trial, analysis suggested that many card-based players had high use of their card during the trial period. Specifically, data analysis suggested that:</p> <ul style="list-style-type: none"> <i>• players on average used the card for 21.75 days of play during the trial (or 1,392 days across 64 players)</i> <i>• 71.9% of players had 21 or more sessions of card use for each day of EGM play (8,121 sessions during the</i> 	<p>Analysis of EGM transactional play data confirms that players have extensively trialled the card during the six month trial period and given the eBet product significant use to allow conclusions to be drawn about its overall usability as a card-based gaming product.</p> <p>Findings highlight that, despite emphasis of benefits, uptake of limits as an 'opt-in' process is likely to be low in most market situations. From this perspective, introducing an 'opt-out' form for limits (i.e. where players have to purposely opt-out of a limit by completing a form) may be worth considering as a harm-minimisation measure.</p> <p>There is also potential to introduce harm minimisation information at the point of</p>

	<p><i>trial period) (Sessions are defined as EGM play from the point of card insertion to card removal)</i></p> <ul style="list-style-type: none"> • players turned-over on average \$7,415 during the trial period (and a total of \$444,934 across 64 players) (<i>Turnover is money put through - not money spent</i>) • average nett player expenditure for the trial was approximately \$923 and equivalent to a spend per player of \$48.10 per day • players each spent an average of 2016 minutes of EGM play on the card during the trial. <p>A comparison of transactional data six months BEFORE and six months FOLLOWING implementation of card-based gaming (1-9-07 to 31-8-08) also showed that:</p> <ul style="list-style-type: none"> • sessions of play per day increased slightly from pre-trial to trial (from 383.2 sessions per day before to 386.7 sessions per day following card implementation) - while this may be due to a 'novelty effect' of the new card, it is likely that this is more so due to the ability of players to more easily move from EGM to EGM • EGM turnover reduced slightly from \$344 to \$319 per player per day and EGM spending (nett loss) reduced from \$41.97 to \$39.78 per player per day (a 5.2% decrease in nett expenditure) • a total of only 18 of 64 card-based players elected to set a limit on their card during the trial (despite benefits being actively promoted by venue staff) (equating to roughly only 28% of players) • while transfer limits were marginally more difficult for players to understand than nett daily spend limits, the most common type of transfer limits set by players was the default value of \$100 transfer at a time. Similarly, players also stayed with the \$1000 default maximum card balance • limits set by players were generally conservative - N=11 limits were set a \$50, N=9 limits were set at \$100 and N=3 limits were set at under \$50 (Note - this does not add to total players as four players changed their limits and one further player did not set a limit on sign-up, but then elected to set a limit later) • a comparison of players (who did and did not set a limit) also revealed that players who did set a limit decreased their spending significant more from pre to post-implementation compared to players who did not set a limit. In particular, nett daily spend of players who set a limit decreased from \$64.02 to \$39.26 spend per player per day, while daily spend of players who did not set a limit only decreased from \$53.26 per player per day to \$51.90 • a very extensive analytical coding of limits also showed that in cases where 	<p>players setting limits to ensure that informed decisions are made about the affordability of selected limits.</p> <p>This is particularly important, given that players are very unlikely to change their spend limits once they are set (often because they cannot be bothered).</p> <p>This information could also include a table outlining likely discretionary spending for players on different household or personal incomes.</p>
--	--	---

	<p>players set a limit, players kept either roughly to their limit or under their limit on 80% of the total days of play - Hence, players only went over their limit on 20% of the days of total play</p> <ul style="list-style-type: none"> • further analysis showed that players who didn't tend to keep to their limit were slightly older than players who did (for both males and females). This may be due to players having more available time for gaming and possibly playing due to loneliness (even in spite of older players presumably having a lower household income due to their age) • while large samples were not available to link CPGSI data to players setting limits, it was interesting to note that even low to moderate risk gamblers who set limits were still likely to keep to those limits during play <p>Attitudinal survey results also showed that players found limit warnings quite useful and a good reminder to keep an eye on their spending. It was also apparent that higher-risk gamblers were generally more likely to be triggered to think more about their gaming affordability, limits and spending when a warning occurred (even about time spent gambling for that matter).</p> <p>Comments suggest positive impact of limit warnings included:</p> <ul style="list-style-type: none"> • <i>I reached my limit and it scared the hell out of me. I thought \$100 and thought how did I lose all of that? I went home and said that's it.</i> • <i>It made me think and realise how much I put in. It made me slow down a bit and think how much I put back in after a win. Although I did keep playing.</i> • <i>I was shocked as I didn't realise how I'd gone through that much.</i> 	
<p>Finding 6. Venue staff reported positive experiences with card-based gaming and the usability of the card-based gaming product.</p>	<p>Findings of the current trial clearly highlighted a very different experience of card-based gaming by the implementation venue. Staff were generally satisfied with the product and had positive praise for the ability and motivation of both the system supplier and the LMO to support product implementation. Venue uptake of the product was also strongly associated with an interest in consumer harm-minimisation and a desire to be viewed as a leader in harm-minimisation.</p> <p>Staff also reported some reduction in workloads due to the convenience of less player support required in cashless gaming (eg. fewer payouts and hopper refills). Staff held a view, however, that 'big punters' seemed less interested in card-based gaming and suspected that this was linked to a fear of play being monitored. Example comments made by staff suggesting support for the product included:</p> <ul style="list-style-type: none"> • <i>I think it's great. It wasn't daunting at all. Players don't have to wait for payouts or hopper refills. We've found it less work.</i> 	<p>Unlike the first pre-commitment trial where the venue owner was not strong in support for card-based gaming, the current venue was very supportive.</p> <p>This in turn has assisted with the overall success of the card-based gaming trial, as identified in the first recommitment evaluation. A further success factor was the quality of the training provided by the system supplier and the simplicity of the limit options (a single main limit) and ease of product usability.</p>

	<p><i>There's also less dealing with customers in changing money.</i></p> <ul style="list-style-type: none"> <i>• I think the benefits are that it helps people control their spending. People have been saying - 'I was surprised how quickly I did that \$100. But I don't think the problem gamblers are taking it up. Not too many of the platinum loyalty members have taken it up.</i> <i>• I felt very confident with the training provided. We already had the eBet loyalty system for a couple of years and it made the training much easier. We were already pretty familiar with it.</i> <i>• I think it's pretty easy to use. The only problem is making sure people know to first put their card pin number in. Sometimes they put it in without the pin and then have problems.</i> <i>• We do save some time, but I feel we spend more time now troubleshooting the system. It's hard to say given that some problems are also because it's new and we're not as familiar with the new system</i> <i>• Not all staff are competent in it as yet though. It takes a while for staff to learn.</i> <p><i>* Note: some information from the original report has been deleted from Finding 6 as it may contain information which is of a commercially sensitive nature</i></p>	
<p>Finding 8. Usability testing of the card-based gaming system indicates that the eBet product is easy to use for most players. However, a range of minor improvements were suggested by players.</p>	<p>Key findings of usability testing included:</p> <ul style="list-style-type: none"> • while some users said they would not want to sign up for the card due to potential limits to “flexibility in spending”, all users believed the card to be a potentially valuable tool for managing gaming expenditure • users interested in the card suggested that the separation of entertainment expenditure from everyday spending would be valuable • card limits were easily understood, particularly after reading supporting information • key drivers of the choice to set limits and limit levels included personal income, entertainment budget, the perceived amounts needed to “have fun” and “have a win” and perceived amounts that constitute reasonable and excessive spending • preferred daily limits generally ranged between \$50 and \$100 • \$1000 was generally considered to be an appropriate card balance limit • while most players found the gaming card easy to use, some had trouble understanding how money was transferred between the card and the machine and how to check the card balance while playing or made mention that it flashed up too quickly to see • users considered the expenditure statement as an excellent tool, providing visibility to spend on gaming machines 	<p>While the card-based gaming system is generally well-designed, minor future refinements to the design could include:</p> <ul style="list-style-type: none"> • providing additional information on the benefits of the card both from a gaming point of view (e.g. loyalty points) and from a harm-minimisation perspective (i.e. how the card can help manage expenditure) • reformatting the application form to allow applicants to fill it out from top to bottom, rather than left to right • simplifying/further explaining terms that are not commonly used, such as “Net Daily Limit” and “configuration” • providing clear instructions about how to transfer money onto the card and checking the card balance during play (i.e. Having a button with check balance on it, instead of transfer, which is currently the way of displaying the balance. In addition, showing the balance for a few more seconds than currently displayed would be more useful (as the display is

		<p>too quick and can lead to people missing the balance)</p> <ul style="list-style-type: none"> • implementing harm-minimisation warnings on the card or incorporating harm-minimisation algorithms designed to protect players from harm • having a mechanism for players to easily display their limits at the EGM interface.
--	--	---

- Note: Finding 7 has been removed from the extract as it may contain matter which is of a commercially sensitive nature.

SUMMARY

Findings of a product evaluation of the eBet card-based gaming trial at the Sandgate RSL highlight positive player, venue and provider experiences with the trial. Most notably, the product is viewed as user-friendly by players and most players see both convenience and harm-minimisation as potential key benefits of the product.

From this perspective, the current trial has been quite successful and subject to results of compliance testing, the eBet card-based gaming product could be seriously considered for further roll-out across other venues in Queensland.

APPENDIX B – SCOTTLER CONSULTING KEY FINDINGS FROM THE REDCLIFFE RSL TRIAL

Key findings of the evaluation of the card-based gaming system at Redcliffe RSL included:

Key Findings	Description of Key Findings	Implications
<p>Finding 1. Findings showed that uptake of card-based gaming required around three-four months to peak and level out.</p>	<p>Similar to previous trials, uptake of card-based gaming was by no means immediate and a number of promotional processes were needed to stimulate uptake of card-based gaming in players. Approximately, 341 players had taken up the system between August 2008 and early March 2009, with only 13% of players opting for a daily spend limit (and the rest opting for just cashless gaming alone).</p> <p>Methods used by the venue to promote SIMPLAY included:</p> <ul style="list-style-type: none"> • offering a \$20 sign-on incentive in SIMPLAY points (a Redcliffe RSL incentive) • Maxgaming offered to SIMPLAY users the chance to win in a \$500 weekly draw (which was limited to SIMPLAY users and ran for 10 weeks during the trial) • Maxgaming placed 6 staff on site to sign-up players during the trial (an early phase) • Redcliffe RSL promoted the availability of card-based gaming through a written letter/promotion to club members. <p>Analysis of product uptake showed that, following implementation in August 2008, 79% of SIMPLAY players had already taken up SIMPLAY by November 2008 (within four months). In contrast, roughly only 20% had taken up SIMPLAY in the later months of the trial.</p> <p>Interestingly, reports from the venue tended to suggest that the \$500 weekly draw was not a major incentive for participation, however, some success was achieved through the offer of \$20 in SIMPLAY points to players.</p>	<p>The current trial has shown that, even in spite of quite aggressive promotions, uptake of card-based gaming will not be universal or immediate in the early stages of market adoption.</p> <p>While this is likely to change as card-based gaming and pre-commitment become more commonplace, early trials will require significant effort to encourage adoption to achieve the objectives of pre-commitment as a gambling harm-minimisation measure.</p> <p>In particular, with only 13% of all players opting for pre-commitment, the trial has also shown that cashless gaming is seen to offer greater benefit to players, compared to pre-commitment alone.</p>

<p>Finding 2. The relatively automatic card set-up process for SIMPLAY was seen as very easy and user-friendly for players.</p>	<p>Unlike past trials, where card-based gaming required a form to be completed by patrons, SIMPLAY merely required a card swipe and button press (at a kiosk) to set up the card for cashless gaming (i.e. an existing club membership card).</p> <p>As that this required less than 30 seconds (and was performed at the SIMPLAY kiosk, with which players were already familiar), it was very positively regarded and received by players. Indeed, most saw the sign-up process as negligible in time investment and very consumer-friendly.</p>	<p>Future pre-commitment systems which incorporate more automated sign-up processes such as the kiosk for SIMPLAY are likely to be well-received by players.</p> <p>An automated sign-up process appears to be significantly more acceptable than form completion by players and should be encouraged as a potential mechanism to encourage players to sign-up for card-based gaming and pre-commitment.</p>
<p>Finding 3. There is potential to further improve the level of harm-minimisation information supplied in written format to support card-based gaming.</p>	<p>Findings of the SIMPLAY survey showed that 69% of players in the trial indicated that they read most of the supplied written information on card-based gaming (i.e. a SIMPLAY brochure), 25% indicated that they had read a little of the information and 6% read none of the information.</p> <p>While differences were not statistically significant, a slight trend appeared to show that higher risk groups may have been less likely to read most of the written information, compared to non-problem gamblers.</p> <p>However, while information contained much content on card-based gaming functionality, very limited information was available to help inform players about the choice of limits or the benefits for setting limits.</p> <p>Accordingly, investigating ways to ensure that consumers both review and consider written materials will be important in the future delivery of successful pre-commitment implementations.</p>	<p>Future policy should consider imposing a requirement for card-based gaming providers to supply compulsory information on the benefit of pre-commitment and information to assist players to select affordable and appropriate EGM limits.</p> <p>This information has generally not been included on previous card-based gaming brochures and would assist in achieving the broader objective of harm minimisation.</p> <p>Further research should also investigate ways to ensure that all players read materials and consider information, which may assist players to set and keep to affordable limits (particularly with regards to higher risk players).</p>
<p>Finding 4. At a general level, SIMPLAY card users were relatively positive about the SIMPLAY card-based gaming product.</p>	<p>Discussions and surveys with EGM players who trialled the SIMPLAY card-based gaming product highlighted that the product was generally seen as user-friendly and convenient by players. As with most past trials, by far the most significant perceived benefit related to the availability of cashless gaming and the associated convenience of not having to wait for hand pays and the ease of moving from EGM to EGM.</p> <p>Reflecting positive overall sentiment, 98% of players considered the product as easy to use and user-friendly, 96% felt confident in using the card and 88% enjoyed using the card for their gaming. Example player comments included:</p> <ul style="list-style-type: none"> • <i>Using SIMPLAY just makes it easier to play. The money just gets transferred onto on your card. It's easy.</i> • <i>I can just collect my winnings directly with SIMPLAY.</i> • <i>SIMPLAY is better as I do not like waiting for a collection.</i> • <i>SIMPLAY is easier for me, as I have to go collect my children and I save time this way.</i> 	<p>The Redcliffe RSL trial further highlights the clear benefits seen in card-based gaming and particularly in cashless gaming from a consumer perspective.</p> <p>Once again, findings re-emphasise (as with past trials) that pre-commitment is not seen as the major benefit of card-based gaming, however, cashless gaming may assist in facilitating improved monitoring and control over gaming expenditure.</p>

	<p>In addition, while some players had a few 'teething issues' with the card during the early stages of the trial, the card system was generally seen to be now working effectively in the venue. In addition, similar to other trials, pre-commitment was not seen to be a key benefit to players and generally only attracted interest of a small number of players.</p> <p>However, some players reported that having cashless gaming itself helps facilitate improved tracking and control over gaming expenditure. For instance, example player comments included:</p> <ul style="list-style-type: none"> • <i>If I come in and still have \$15 on the card, I put another \$20 limit on it (i.e. the card was a vehicle for pre-commitment, rather than the limit)</i> • <i>My limit in my mind is \$50. It (the card) does help you keep track of it better.</i> • <i>My psychological limit is \$100-150. If you have a card, it can help you keep track of your spending.</i> <p>Accordingly, similar to the previous trial, cashless gaming itself may offer some potential harm-minimisation benefits to players over and above regular cash-based gaming. In addition, players also support the concept of broader roll-out of card-based gaming to allow play at multiple venues and voluntary use of cards at a player level.</p>	
<p>Finding 5. While SIMPLAY was well-regarded by players, research identified a range of system design issues with potential to undermine the harm-minimisation objectives and potential of card-based gaming.</p>	<p>Focus groups, surveys and usability testing of the SIMPLAY card-based gaming system highlighted a number of system design issues with potential to undermine the harm-minimisation objectives of card-based gaming.</p> <p>In particular, findings of the evaluation revealed that there needs to be greater salience of the 'balance check' button to facilitate easy player checking of card balances while using cashless gaming at the EGM (some players were unaware that this was available on the EGM, while others only thought they could check balances at the kiosk). This could either be achieved through improved player training to identify and use the existing button or alternatively, through more obvious identification of the balance check button on the EGM interface (eg. brighter labelling etc.).</p> <p>In addition, clearer instructions need to be presented on the kiosk to assist players to check balances (eg. Hold button for 2sec to show your card balance, as this button has a different functionality compared to the other 'press and release' buttons on the kiosk).</p> <p>Similarly, players need to be able to alter their transfer amounts at the EGM interface to allow informed consent for each transfer from their card to the EGM. In this respect, the automatic transfer amount of \$20 (as default) should not be permitted, as it has potential to encourage players to continue</p>	<p>Policy for future card-based gaming system approval should consider requiring the need for systems to:</p> <ul style="list-style-type: none"> • not permit any default values to be set for daily spend limits, time limits or transfer amounts from the card to EGM (However, it may be appropriate for card balance limits to have defaults - eg. max of \$1000 on card) • prohibit automatic transfers from card to EGM, as this is inconsistent with the principles of informed consent during EGM play • incorporate design features to enable players to check their card balance at the point of the EGM interface and be clearly visible to players (<i>perhaps as established through independent system usability testing</i>) • allow players to easily change the amounts transferred from the card to machine at the EGM interface - such as through incorporation of a keypad • incorporate information

	<p>EGM play without making an informed decision to do so.</p> <p>Illustrative comments by players included:</p> <ul style="list-style-type: none"> • <i>I would like to be able to transfer another \$5 without having to take the card out.</i> • <i>It is tempting to keep playing, if the card transfers \$20 and you want to use only \$5.</i> • <i>It's annoying how it's always \$20. How about it you only want \$10? You're just being tempted to spend money you may not want to spend.</i> <p>From this perspective, keypad implementation to allow players to change transfer limits at the EGM interface should be a compulsory requirement (At the moment, transfer amount changes can only be done at the kiosk and leaving the EGM is a disincentive for players).</p> <p>Other design issues identified with SIMPLAY included:</p> <ul style="list-style-type: none"> • the need for a 'splash screen' (or similar) to be presented when players initially set up their card to assist in the choice of each individual limit and card parameters - For instance, instead of daily spend limits just being available as a button, on initial set-up, players should be explained both the (1) Benefits of setting a daily limit and (2) Basic tips on how to select an affordable limit • the need for players themselves - rather than staff – to select limits and other amounts on their card - In this respect, while staff intend to be helpful, some players reported that staff had set values on their behalf, thus limiting the level of informed consent in pre-commitment and other card parameter decisions • the term 'session limit' is confusing to players and should be relabelled to reflect it's meaning as a time limit with an explanation of the meaning and benefits of setting such a limit • when players reach their limit, there is current no warning on the EGM screen and a message is displayed which does not show the player that a limit has been reached (currently, the limit exceeded warning is ONLY on the very tiny GMI screen) 	<p>'splash screens' as part of system design to help players understand the limits and parameters they are setting</p> <ul style="list-style-type: none"> • consider prohibiting venue staff from making decisions about player card limits/parameters (thus requiring players to set-up their own cards, although this could still be supported by staff, where players need assistance) • limits need to be clearly labelled to ensure that players can understand their purpose and benefits (eg. the term 'session limit' - in effect a time limit on SIMPLAY - is unclear to players) • limit warnings should, where possible, be displayed on the EGM screen as this area is more visible to players than the small GMI screen.
--	--	--

<p>Finding 6. While SIMPLAY has potentially very useful print-outs of player expenditure, current statement labelling and presentation undermines the potential of statements to support consumer awareness of gambling expenditure.</p>	<p>Findings of the current evaluation highlighted that most players cannot interpret the design of expenditure statements accessible from the SIMPLAY kiosk or from venue staff behind the counter.</p> <p>In particular, labelling is confusing and terms such as 'draw up' and 'draw down' have no or limited meaning to players. Many players who viewed statements generated from the SIMPLAY kiosk highlighted that they cannot understand the supplied information.</p> <p>In addition, the menu system for accessing statements could be made clearer, as could the ability of players to be able to access more detailed statements behind the counter (eg. players and even most venue staff were unaware of this).</p> <p>In addition, the presentation of the statement behind the counter on three separate fragmented pieces of thermal roll makes it difficult for players to interpret their gaming expenditure.</p> <p>Accordingly, the design and implementation of player statements needs to be considered from a harm-minimisation perspective</p>	<p>SIMPLAY design in relation to expenditure statements needs to improve to enable expenditure information to be more readily accessible to players. In particular:</p> <ul style="list-style-type: none"> labelling needs to clearly identify expenditure both on the kiosk screen and on paper players and staff need to be more well-informed about the benefits of expenditure statements detailed statements available from counter staff need to be presented on a single piece of paper to improve player understanding of the information (rather than on three separate fragmented pieces of paper)
<p>Finding 8. Venue staff reported positive experiences with the SIMPLAY card-based gaming and the support provided by the system supplier. However, benefits of the system to the venue from an operational perspective were uncertain.</p>	<p>From a staff and venue perspective, the Redcliffe RSL generally had positive experiences of the SIMPLAY card-based gaming system and implementation. However, it was also apparent, as with all trials, that a range of bugs and technical implementation issues were experienced during the early phases of the trial.</p> <p>These were reported as having led to some player frustration during the trial, including some players 'giving up' on the system during the early post-implementation phase. However, since most early issues had been resolved, the venue believed that the system was now working reasonably effectively.</p> <p>In addition, staff were reasonably satisfied with the training provided and commended the system provider with the level of technical system support offered during the trial.</p> <p>The venue was surprised, however, that only a small proportion of players had taken up card-based gaming and it was apparent that the venue had expectations of higher levels of system adoption by patrons. Staff reports of limited time-savings afforded by the system and minimal uptake also led to venue management being uncertain about the value of the system at a venue level. Staff believed that limited uptake was in part related to the older age demographic of the venue and that system adoption was less likely in older players.</p>	<p>The current trial highlights that, even venues very committed to gambling harm-minimisation, need to carefully evaluate the potential of the system to improve venue productivity.</p> <p>Consideration should be given by OLGR to possible incentives to venues to adopt card-based gaming for the delivery of pre-commitment.</p>
<p>Finding 10. Behavioural EGM data analysis</p>	<p>Findings examining gaming behaviours associated with the SIMPLAY card-based gaming system revealed that:</p>	<p>Findings provide some interesting new evidence to suggest that higher risk groups</p>

<p>highlights some interesting new trends relating to the SIMPLAY card-based gaming system.</p>	<ul style="list-style-type: none"> • an average of 175 sessions for female players and 200 sessions for male players occurred during the trial - older age groups were the biggest users and males 65 years and over were the group recording the highest number of card-based gaming sessions. In contrast, younger age groups had much less use of the card • females spent an average of 13.8 days using SIMPLAY and males spent an average of 18.0 days • mean transfers from card to credit meter were \$3,169.60 for females and \$3,354.10 for males and mean transfers from credit meter to card were \$3837.10 for females and \$3927.80 for males • 12% females and 15% of males set a card limit - analysis also showed that uptake was higher in females 50-64 years (14%) and in males 35-49 years (23%) • most players set fairly conservative limits with the maximum limit set of \$100 and \$100 was the most popular limit for both genders (6%) • 30 players (of the total of 45 who set limits - i.e. 67%) received 'limit exceeded' warnings during use of their SIMPLAY card (1 to 48 total warnings per player) • While one of the limit parameters that could be set on SIMPLAY allowed time-based gaming limits (termed 'session reminders'), not a single player elected to set this limit during the trial • 41 players adjusted their transfer amount during the card-based gaming trial (i.e. from the \$20 default) • older females and males had the largest number of total kiosk uses across the trial (probably because they were more frequent players). However, when mean gaming sessions per kiosk use was examined, females were found to have used the kiosk less than males and older people (both males and females) also used the kiosk less. This may be due to less comfort with technology (although it is difficult to be certain) • findings showed that SIMPLAY player expenditure overall increased 4.44% comparing the trial to the same months in the previous year. In contrast, non-SIMPLAY players increased only 1.35% (although average daily turnover increased 6.47% for Redcliffe, 5.67% for Brisbane North and 6.18% for Qld since 2007/08) (based on same months of the trial) • analysis showed that 42% of players spent less on SIMPLAY, 5% spent about the same and 53% spent more (comparing the trial to the same months during 07/08) • players who set a limit decreased their spending by 8.2%, while players who did not set a limit increased their spending by 5.6% - players who did not change their limit ALSO tended to 	<p>may be more likely to adopt pre-commitment and that pre-commitment may be associated with a decrease in spending (i.e. not card-based gaming itself, but actually setting a limit on a card).</p> <p>Given the value of such a trend in the context of gambling harm-minimisation policy, this is worthy of further research investigation in future trials.</p>
---	---	---

	<p>spend less, than players who constantly changed their limit</p> <ul style="list-style-type: none"> • players who received a warning as part of their limit were more likely to decrease their expenditure (expenditure dropped 21.2% since 07/08) compared to players who set limits, but didn't receive warnings (expenditure for this group increased 41.4%) • matching of EGM play data to survey data also revealed that at-risk players were more likely to use card limits, compared to non-problem gamblers (eg. limits were used by 11% of non-problem gamblers, 8% of low risk gamblers, 19% of moderate risk gamblers and 33% of problem gamblers) <i>(although small cells should imply caution over-interpreting data)</i> • while samples were too small for meaningful analysis, it was interesting to note that the moderate risk and problem gambling groups were the only groups to elect a \$100 limit (while other groups opted for much smaller limits) • moreover, the higher risk group of players was more likely to have decreased spending since uptake of card-based gaming, compared to the lower risk group. This may also be a reflection of different income levels or other factors, but nevertheless presents some interesting trends for consideration. 	
--	---	--

* Note: Findings 7 and 9 have been removed from the extract as they may contain matter which is of a commercially sensitive nature.

SUMMARY

The current trial of a card-based gaming product at the Redcliffe RSL delivers further converging evidence to highlight the value of card-based gaming to consumers. In addition, it also highlights a range of other insights about card-based gaming with respect to ways to ensure that system design delivers clear harm-minimisation benefits.

From this perspective, the third trial of card-based gaming in Queensland has added further knowledge and understanding about the benefits and impacts of card-based gaming and pre-commitment and can assist in informing future policy and strategy relating to card-based gaming on a broader-scale.