



Victorian Commission for
Gambling and Liquor Regulation

Cashless gaming operational guidelines for venue operators

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1. Introduction

This document specifies operational guidelines for the operation of cashless gaming in gaming venues.

Cashless gaming includes Ticket-In Ticket-Out (TITO) and Card-based Cashless Gaming (CBC) in gaming venues.

2. Intended audience

This document is intended for the guidance of club and hotel gaming venue operators who wish to provide cashless gaming facilities in their venues.

Although most of the principles would apply to cashless gaming at the Melbourne casino, this document is specifically for gaming venue operators.

3. Purpose

This document is intended to provide guidance on Ticket-In Ticket-Out (TITO) and Card-based Cashless Gaming (CBC) in gaming venues that opt to install these facilities.

The introduction of cashless gaming in gaming venues is not compulsory. However, once a decision is made to offer cashless gaming facilities, it is important that venue operators ensure that the standards of integrity, auditability, responsible gambling and fairness of players that already apply to the operation of a gaming venue are not lowered with the introduction of cashless gaming.

This document sets out operational guidance to assist venue operators in achieving this objective.

4. Context

This document should be read in the context of the *Gambling Regulation Act 2003*, technical standards and associated regulations, in particular the [Accounting and Auditing Venue Requirements](#). Please see a list of relevant reference material at the end of this document.

5. Requirements for the installation of cashless gaming

Technical requirements for cashless gaming systems are specified in the Commission's technical standards which are available on the Commission's website on the [Technical standards for gaming industry](#) page.

Only systems that have been certified compliant with the Commission's technical standards and have been successfully interoperability tested with the monitoring system can be installed in gaming venues.

Equipment cannot be installed in electronic gaming machines to support cashless gaming (or for any other purpose), unless the relevant manufacturer or service provider has sought approval for the EGM to be modified to incorporate that equipment.

Before entering into an arrangement or purchasing a cashless gaming system, venue operators should ensure that cashless gaming system provider:

- has entered into agreements with the monitoring licensee to facilitate interconnection of the cashless gaming system to EGMs via a secure interface to the monitoring system
- can attest that end to end testing of the cashless gaming system has been undertaken by an ATF which has resulted in certification, and
- has provided appropriate operating systems, documentation and operating procedures, including a help desk and patron complaint handling methodology.

6. Security and privacy of systems and player funds

Cashless gaming systems are entrusted with patron's funds. It is therefore important that access to the system is restricted to appropriate staff, and that access controls are maintained by the venue operator.

Cashless gaming system servers should be located in a secure environment (with PIN, card or key access). Venue operators should develop documented access controls to ensure only appropriate, authorised personnel have access to the server and other relevant equipment. This includes processes for granting and revoking access to the Server and/or the cashier terminal. Access levels should be the subject of regular review.

Cashless gaming systems should be regularly backed up.

Cashless gaming systems should protect the privacy of player funds, and keep TITO ticket Authorisation Codes confidential. Staff should not attempt to over-ride controls in the system.

Venue staff should not ask patrons to reveal their PINs, and should not actively observe input of patron PINs.

Cashier terminals should be located behind a counter.

CRTs should be secured with appropriate locks/keys, that are:

- unique to the CRT at the venue
- obtained from a lock supplier who maintains a record of locks supplied to venue operators (with keys being duplicated only by the supplier who supplied the initial key)
- of a type that cannot be easily reproduced.

7. Providing assistance

Technical standards require that transactions should be auditable and be able to support the resolution of customer disputes. Patrons should have access to at least one venue staff member or manager who can investigate the basic or common cashless gaming complaints. Documented escalation processes/instructions should exist for more complex complaints.

8. Ongoing responsibilities of the venue operator for cashless gaming

Cashless gaming system providers may or may not be responsible for the ongoing operation of a turnkey cashless gaming system. Whether the back of house system is operated by the venue operator or the cashless gaming system provider is a commercial and contractual matter between those parties. Venue operators are, however, responsible for ensuring compliance with all legislative and regulatory requirements in relation to cashless gaming activities.

Venue operators should:

- implement procedures to ensure operational integrity of gaming transactions and conduct regular reconciliation of cash/TITO/CBC/monitoring reports
- implement measures that foster responsible cashless gaming and are also consistent with the venue's responsible gambling code of conduct, or update the responsible gambling code of conduct to ensure cashless gaming processes are addressed with regard to responsible gambling
- ensure that all procedures associated with the operation of a cashless gaming system are documented¹, and support all regulatory requirements, including those in this document
- staff are adequately trained and provided with access to written documentation,
- have a register identifying personnel authorised to access the cashless gaming database and noting when authorisation starts and ends², together with a log showing access to the system, and
- above mentioned documentation is provided to VCGLR inspectors upon demand.

1. Venue operator documentation can supplement ancillary service provider documentation, provided a comprehensive set of documents covering all procedures is available to staff and VCGLR inspectors.

2. Section 7.9 of the technical standards requires two staff to be authorised to access the database.

9. TITO-specific responsibilities

TITO systems should provide for accountable, transparent and auditable recording of transactions so as to enable the accurate calculation and reporting of gaming revenue, player payments, and any other TITO-related financial information required for a venue to comply with its regulatory obligations (e.g. remittance of unclaimed winnings to the State Revenue Office and to assist with banking requirements). Venue operators should ensure that gaming room staff are trained in use of the system, and follow documented procedures that ensure:

- Tickets are handled with integrity
- regulations are followed in respect of payout limits
- before payment, tickets are validated on the system (except during system downtime)
- hard copies of redeemed tickets are kept as gaming records (in the same way that non-TITO ticket-out tickets are handled), but may be kept in electronic/digital format provided such records can be readily retrieved at a venue and
- patrons are discouraged from exchanging high value tickets for cash with other venue patrons.

Venue operators should have documented cashier processes that determine under what circumstances (if any) a Ticket will be redeemed if either the cashier terminal or TITO system is inactive. If venue operators redeem Tickets under such circumstances, they should implement a procedure for subsequently validating the paid Ticket on the system, when the system becomes available.

Venue Operators should establish an auditable and transparent process for refunding funds for a lost or damaged TITO ticket in cases when the identity of the patron and the patron's claim to the funds can be established.

Venue operators should establish suitable training procedures to ensure venue staff can operate cashier terminals, give instructions to patrons about how to use the CRT, and should ensure that staff are familiar with error messages.

Venue operators should use Tickets that are durable and are legible for as long as they are required to be retained. TITO tickets should resist fading or smudging, through the use of appropriate technology such as top coated thermal paper. Venue operators should have regard for recommendations of the bank note acceptor supplier.

10. CBC-specific responsibilities

Venue operators should set up an account or “cashless wallet” for casual or registered players before they are able to use CBC gaming facilities.

The cashless wallet/account should be stored on the CBC system and linked to the a player card.

The venue operator may only register a player for a registered card if the venue operator is satisfied of the player’s identity and place of residence, the player is at least 18 years of age and the player is not an excluded person.

Documented venue operator processes should support a procedure for adequately identified players to retrieve funds from a lost or damaged CBC card.

CBC players should have ready access to account statements. Requirements for CBC patron statements are specified in the technical standards.

Cashless wallets may be topped up by cash following a separate EFTPOS withdrawal at the gaming venue or via a ticket redemption at a CRT if that facility exists. Cashless wallets should not be linked to a bank account in such a way as to provide direct funds transfer from a credit card, bank account or smart phone app. Venue operators may choose to make a facility available to transfer funds from a cashless wallet into a financial institution account subject to large payout restrictions. These facilities cannot be made available via a CRT as technical standards prohibit CRTs from having such functionality.

Venue operators should have a process in place to manage all cashless wallet liabilities, that ensures adequate funds remain available to pay out any or all cashless wallet balances.

Venue operators should have processes in place, and staff trained, to assist patrons in setting or changing PINs on player cards.

11. Credit/Cash redemption terminals (CRTs)

The maximum ticket value redeemable at a CRT should equate to the lesser of the limit set by the venue or the current limit set by regulations³ over which accumulated credits must be paid by cheque or delayed funds via funds transfer into a patron’s bank account (as per legislative requirements). Venue operators may set their own limits above which players should attend a cashier, but those limits should not exceed the limit set in regulations.

All CRTs should be under good quality closed circuit TV surveillance, as per requirements for cashier terminals, and

3. Currently \$2000 in Victoria.

should be located in an area allowing adequate supervision by venue staff. Supervision should aim to protect integrity of the terminal and transactions, and complement other venue processes around vigilance for possible use of CRTs in money laundering or counter terrorism financing.

If a CRT becomes non-operational, the venue operator should place an “out of order” sign on the CRT as soon as practicable, unless the CRT is already displaying a disabled message on the screen as a result of a TITO system command. The sign should refer patrons to the cashier or a nearby CRT. There should be no encouragement for patrons to return to a gaming machine if a CRT is out of order.

Venue staff should familiarise themselves with the operation of CRTs, so assistance can be given to patrons. In particular, they should be familiar with using basic fault diagnosis and understand fault messages. This includes checking logs of previous transactions to assist with patron queries, complaints or difficulties.

12. Change of service provider

Venue operators and cashless gaming system providers should enter into termination arrangements that include arrangements for the venue operator to switch cashless gaming system provider without loss of data.

Should the venue operator decide to adopt a different cashless gaming system, the venue operator should ensure that there is a transfer of data to the new service provider, to enable continuity of service by the venue operator, particularly the ability to pay out funds that are owed to players.

13. Change of venue operator

Venues may change hands, but patrons expect the provision of gaming services will be seamless between the venue operators. As per current processes, venue operators should have in place arrangements and agreements in relation to cashless wallets and unclaimed TITO Tickets, that enables venue patrons to easily access their cashless wallet funds or their unclaimed TITO Ticket value after the venue has changed hands, at the same venue.