

Gambling Administration Guidelines

Automated Risk Monitoring Systems

Effective 3 December 2020

The following guidelines have been published by the Liquor and Gambling Commissioner under section 17 of the *Gambling Administration Act 2019* for the purposes of section 40A of the *Gaming Machines Act 1992* and section 40B of the *Casino Act 1997*.

1. Introduction

Under section 40A of the *Gaming Machines Act 1992* and section 40B of the *Casino Act 1997* the Commissioner may, on application by a person, approve systems to be operated in connection with authorised games, approved gaming machines or automated table game equipment, or classes of authorised games, approved gaming machines or automated table game equipment being automated risk monitoring systems.

The Commissioner must not approve a system for this purpose unless the system is able to be operated in compliance with the requirements of the *Gaming Machines Act 1992* or *Casino Act 1997* (as relevant) and complies with the requirements of any applicable gambling administration guidelines.

These guidelines replace any previous prescription notice issued by the former Independent Gambling Authority which prescribed the required attributes for systems proposed for recognition as Automated Risk Monitoring Systems.

The Commissioner has no objection to this material being reproduced but asserts the rights to be recognised as author of its original material and the right to have its material remain unaltered.

2. Commencement

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

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

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

3. Transitional provisions

A system previously recognised under section 10B(1)(c) of the *Gaming Machines Act 1992* as in force immediately before the commencement of sub-clause (3) of Schedule 1, Part 3 of the *Statutes Amendment (Gambling Regulation) Act 2019* will, on 3 December 2020, be taken to be an approved system under section 40A of the *Gaming Machines Act 1992* (as amended).

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

4. Intended audience

These guidelines are intended for use by system developers, regulators and gaming venues to support the evaluation and implementation of ARMS in hotels, clubs and at the licensed casino as required by South Australian legislation.

5. Purpose and scope

- (1) These guidelines specify the functional and technical requirements for the operation of Automated Risk Monitoring Systems (ARMS) which must be provided in connection with gaming machines operating in South Australian hotel and club gaming venues and at the licensed casino.
- (2) ARMS monitors length of play and player activity as an indicator for identifying potential problem gambling behaviour. The system is intended to serve as an 'early intervention' tool for detecting 'at-risk' and problematic gambling
- (3) It is not the purpose of these guidelines to mandate a solution or limit technology.
- (4) Any matters arising from the evaluation of a course of training for gambling not covered by these guidelines will be considered at the discretion of the Commissioner.

6. Interpretation

- (1) In these guidelines, unless the contrary appears—
 - (a) **device** means an apparatus, or a configuration of apparatuses, which when operated in accordance with directions as to use or terms of approval (however described) constitute—
 - (i) an approved gaming machine; or
 - (ii) approved automated table game equipment;
 - (b) **monitoring system** means—
 - (i) in the case of a relevant system intended for use under the *Gaming Machines Act 1992*—the monitoring system operated by the holder of the gaming machine monitor licence; or
 - (ii) in the case of a relevant system intended for use under the *Casino Act 1997*—the monitoring system approved by the Liquor and Gambling Commissioner;

- (c) **official research project** means a research project designated as such in writing by the Commissioner, by reference to—
- (i) the terms of reference or project brief for the research project;
 - (ii) the identity of the principal researcher and the auspicing institution or organisation for the research project (if any); and
 - (iii) the source of the funding for the research—
- and “**principal researcher**” has a corresponding meaning.

7. Dependencies

- (1) An application for an ARMS system to be operated in South Australian hotels and clubs must include a certification as to the relevant system’s capacity for connection with the monitoring system facilitated through the Independent Gaming Corporation (IGC), the holder of the South Australian Gaming Machine Monitor Licence (Licence number 52400426).
- (2) An application for an ARMS system to be operated at the licensed casino must include a certification as to the relevant system’s capacity for connection with the monitoring system operated at the licensed casino, being a system required to be approved by the Liquor and Gambling Commissioner for the purpose of section 38 of the Casino Act 1997.
- (3) An applicant must provide, with the application, undertakings to the Commissioner that the applicant will, in respect of any official research project, procure and maintain:
 - (a) the reasonable co-operation of every licensee deploying the relevant system;
 - (b) any consents to the use the data reasonably required by the principal researcher;
 - (c) any changes to the applicant’s, licensee’s and third parties’ privacy policies reasonably required by the principal researcher.

8. Submission requirements

- (1) An applicant seeking approval for an Automated Risk Monitoring System in South Australia for the purposes of the *Gaming Machines Act 1992* or *Casino Act 1997* must formally request Consumer and Business Services to perform an evaluation of the product being submitted.
- (2) Applications must be made in the manner and form approved by the Commissioner and be accompanied by the prescribed fee.
- (3) Applications must contain at least the following elements:
 - (a) the date of the submission;
 - (b) a description of the product being submitted and the intent of the submission;
 - (c) the market(s) which the product will be used e.g. Casino, Clubs and Hotels;
 - (d) the full name of the applicant, address for service and address of the principal place of business;

- (e) the contact details of where technical enquires regarding the submission may be directed;
 - (f) system architecture diagram and description on how the relevant system works;
 - (g) a detailed description of—
 - (i) the required hardware and software
 - (ii) the end-user cost structure; and
 - (iii) the individuals or corporate entities which will provide the relevant system to licenses;
 - (h) a statement as to relevant intellectual property licensing (if any);
 - (i) certification as to the relevant system's capacity for connection to the relevant monitoring system; and
 - (j) a statement as to the capacity for the relevant system to operate over more than one venue (if applicable).
- (4) All submission documentation and electronic media must be labelled with the company name, the product name, the product version and the submission date. Resubmissions must also include the resubmission number e.g. version 2. (Note: version numbers are to be unique and any change to an already approved submission should require this unique version number to change).
- (5) To assist in the evaluation of the solution, a report of any testing conducted on the product (prior to the submission) should be submitted. This report must contain the testing body's name, the name of the individual who conducted the testing, a description of what was tested, how it was tested (photos may be required), and the test results.
- (6) As part of the assessment process the Commissioner may request a demonstration of the system to assist in making a determination.
- (7) The approval of a relevant system may be varied or revoked by the Commissioner in accordance with section 40A of the *Gaming Machines Act 1992* and section 40B of the *Casino Act 1997*.

9. Mandatory system attributes

- (1) An automated risk monitoring system must feature the capacity to communicate with an account based cashless gaming system operating in the same venue and to associate activity on an individual cashless gaming account with activity on an individual device
- (2) An automated risk monitoring system must feature the capacity to communicate with systems reasonably available or accessible to the licensee:
 - (a) which hold player information (including information about barring orders); or
 - (b) which allow players to voluntarily set loss limits or other indicators;
 and to incorporate or build on player information in any program of alerts.
- (3) An automated risk monitoring system must feature the capacity for venue staff to manually, or with system assistance, associate play on a particular device with a particular player (whether or not the player is identifiable).

- (4) An automated risk monitoring system must, as indicators to identify problem gambling behavior, include:
 - (a) criteria to determine the commencement and conclusion of a session of play on a device (whether or not the player is identifiable);
 - (b) criteria to suggest when a new session of play should be regarded as an extension of a concluded session of play, whether or not on the same device and whether or not the player is identifiable; and
 - (c) operator configurable criteria to generate alerts when a session of play (including a session of play which is an extension of a concluded session of play)—
 - (i) reaches a certain length; or
 - (ii) involves a certain net gambling outcome.
- (5) For an automated risk monitoring system to be approved, the system must:
 - (a) be capable of communicating with the relevant monitoring system in a manner which is secure and which does not compromise the integrity of the monitoring system; and
 - (b) be capable of communicating with all devices in the venue and with terminals intended to be used by staff.
- (6) User documentation for an automated risk monitoring system must:
 - (a) enable a person who is a Gaming Manager or Gaming Employee for the purposes of the *Gaming Machines Act 1997* or a Special Employee for the purposes of the *Casino Act 1997* to operate the system after having been instructed in the documentation; and
 - (b) explain how the system can be used to identify opportunities for intervention.

10. Non-conforming applications

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

11. References

[Gambling Administration Act 2019](#)

[Gaming Machines Act 1992](#)

[Gaming Machine Regulations 2020](#)

[Casino Act 1997](#)

[Casino Regulations 2013](#)

12. Revision History

Version	Changes	Release Date
1	Original document	3 December 2020