

Office of Liquor and Gaming Regulation

# Guideline for Digital Payment Platforms for Electronic Gaming Machines in Queensland



## 1. Objective

To provide a guideline for the development and use of digital wallets in respect to gaming machines in Queensland.

The *Guideline for Digital Payment Platforms for Electronic Gaming Machines in Queensland* (the guideline) aligns with the *Gambling Harm Minimisation Plan for Queensland 2021-25*, and includes harm minimisation principles for cashless technologies as a priority action item.

The guideline has been created to ensure system suppliers and any venues that are introducing safe cashless digital payment gambling technologies are familiar with the expectations and the proposed solutions. This includes the ability to set limits and other features which support the policy objective of reducing harm from gambling by enabling customers to retain control over their gambling spend.

## 2. Scope

The guideline applies to:

- Queensland licensed monitoring operators
- Queensland casino operators.

The guideline sets out the arrangements for the development, approval, use and monitoring of digital payment platforms for gaming machines in Queensland clubs, hotels, and casinos.

Readers should have regard to the following Office of Liquor and Gaming Regulation (OLGR) minimum technical requirements:

- [Cash redemption terminal minimum technical requirements](#)
- [Card based gaming minimum technical requirements](#)
- [Ticket in ticket out \(TITO\) minimum technical requirements](#)
- [Monitoring systems minimum technical requirements](#)

## 3. Definitions

<b>AML/CTF</b>	Anti-Money Laundering and Counter Terrorism Financing – refer <i>Anti-Money Laundering and Counter-Terrorism Financing Act 2006</i>
<b>Digital payment platform</b>	The end-to-end system of software, hardware, and processes enabling transactions between a user’s financial institution, a digital wallet, a monitoring operator’s gaming system and a gaming machine.
<b>Digital wallet</b>	For the purpose of this guideline, a digital wallet is a software application (app) or service that allows users to store and/or transfer funds or make transactions to and from a gaming system. A digital wallet may use software or hardware built into a mobile device to enable users to make card-less or contactless transfers and/or may facilitate online transfers and transactions between a customer and a merchant.
<b>Electronic gaming machine</b>	Refer to <i>Gaming Machine Act 1991</i> and <i>Casino Control Act 1982</i>
<b>Gaming system</b>	The monitoring operator’s regulated gaming system/equipment that manages the interface between a player’s digital wallet and the transfer of player funds to and from a gaming machine.
<b>Monitoring operator</b>	A licensed monitoring operator under the <i>Gaming Machine Act 1991</i> or a casino operator under the <i>Casino Control Act 1982</i> .
<b>Payment platform provider</b>	The supplier/s of the financial system and/or financial transaction management service components of a digital payment platform.

## 4. Digital payment platforms

### 4.1 What is a digital payment platform for gaming machines?

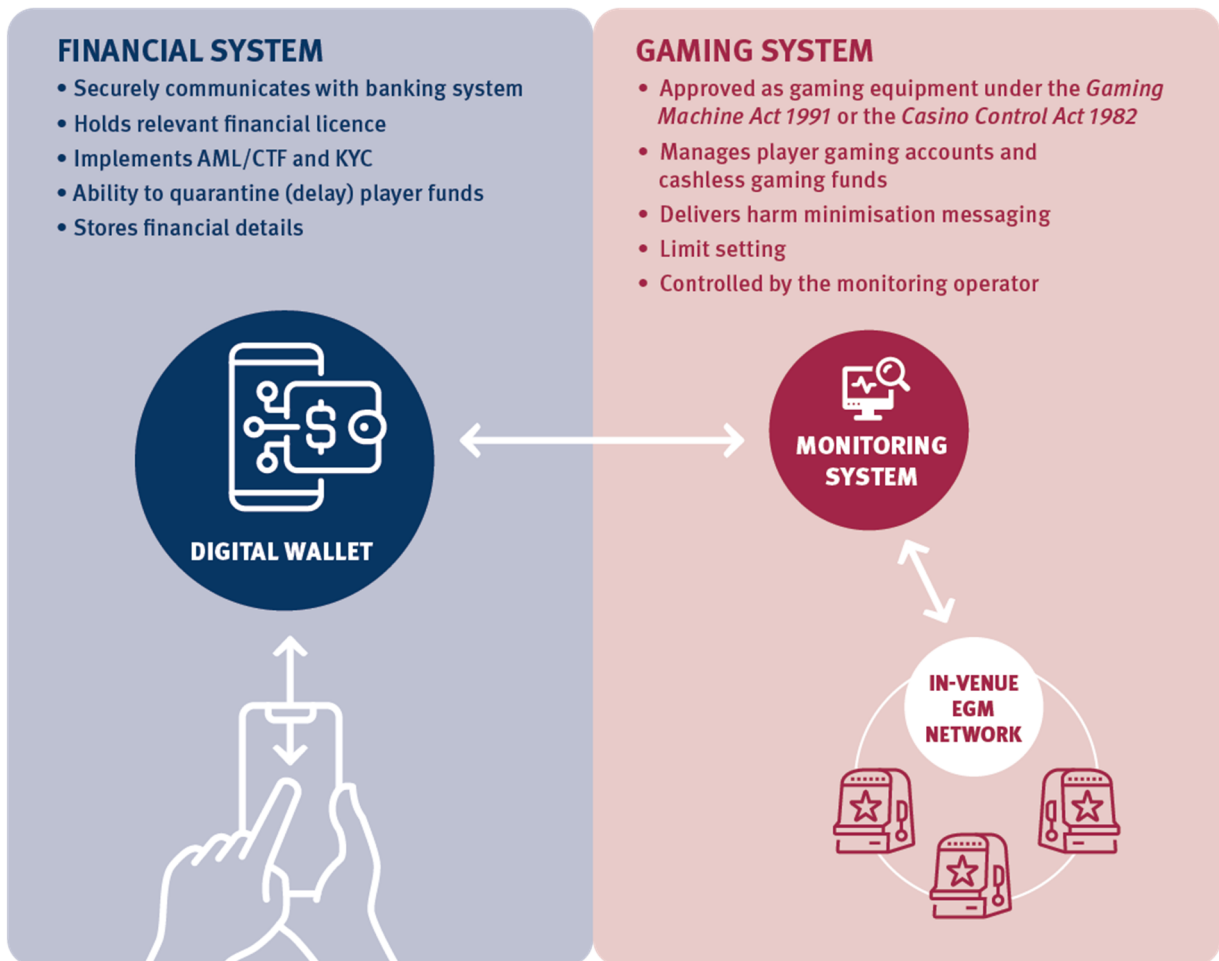
A digital payment platform for gaming machines describes the payments interface between a monitoring operator's gaming system and an existing way to pay using a mobile wallet or online (refer Figure 1). This guideline identifies requirements applied to components, systems and processes involved in transactions between a player's bank account and a gaming machine through the payment interface.

#### Key features

- Establishes the identity of players through Know Your Customer processes.
- Transacts through a secure financial system to ensure security and integrity of digital wallet transactions and/or storage of funds.
- Integrates with an approved gaming system that:
  - authorises the transfer of player funds to and from a player's digital wallet
  - digitally stores player funds when in use for gaming
  - authorises the transfer of player funds to and from gaming machines.
- Implements player protection features – see 5.2.

Figure 1 - An example of how a digital payment platform may comply with the guidelines

#### Concept Map – Digital Payment Platform for Electronic Gaming Machines in Queensland



## 4.2 How does a player use a digital payment platform?

The digital payment platform may include a digital wallet app installed on a customer's mobile device and may include other supporting hardware for transferring funds to and from the gaming system.

The digital payment platform must include clear instructions and information about:

- downloading, signing up to and accessing the digital wallet app, its terms and conditions of use and identity verification requirements
- how a customer initiates links within the digital wallet to their financial institution
- signup requirements for a gaming system account (if required), its terms and conditions of use and identity verification requirements
- access and use of player protection mechanisms
- initiating funds transfers to, from and within the digital wallet
- making digital funds available for play within the gaming system
- activating funds at a gaming machine for play
- withdrawing and collecting funds/winnings from gaming play to a gaming account/digital wallet account
- accessing cashless play activity data.

Monitoring operators must provide training, communication material and support to their licensed venues enabling them to assist customers with information about how to sign up, access and use their digital payment platform.

## 5. Digital payment platform functionality

Digital payment platforms must only transfer funds to and from a gaming machine using equipment that is approved under the *Gaming Machine Act 1991* or *Casino Control Act 1982*.

Platforms must connect with all gaming machines that have enabled cashless payment technology regardless of manufacturer or venue.

### 5.1 Anti-money laundering and counter-terror financing protections

Those involved in the provision and operation of a digital payment platform must comply with any applicable obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 including those related to:

- identifying and verifying the identity of customers, conducting ongoing due diligence such as transaction monitoring, and enhanced customer due diligence where required
- reporting transactions to AUSTRAC where required, including suspicious matter reports, and threshold transaction reports arising from any cash deposit features
- When provisioned with and using a digital wallet, players must be authenticated through Know Your Customer procedures including prior to linking financial institution accounts and transacting with a gaming system.
- Digital wallet transactions must be subject to AML/CTF requirements, including any cash deposit features being subject to proof of identity checks and ongoing and enhanced customer due diligence.
- A player must have only one player account per gaming system to link to their digital wallet. Data relating to gaming play and gaming transactions through a digital payment platform must be available to OLG and law enforcement bodies (in a de-identified form).

## 5.2 Player protection mechanisms

The platform must be capable of:

- prohibiting minors from establishing or using a digital payment platform for gambling
- prohibiting the use of credit cards, line of credit loans, Buy Now Pay Later schemes, automatic top-ups and transfers from overdrawn accounts
- the ability to facilitate breaks in play through methods such as delayed cashless transfers under certain circumstances and/or the use of pop-up warnings and ability to cease betting functionality
- including a secondary confirmation and self-appraisal message and option to cancel a transaction to fund a gaming account
- the ability to delay funds/winnings so they cannot be immediately used/reused for gambling purposes
- the ability to suspend the digital wallet for gaming play or for a period of time selected by the player
- implementing mandatory or opt-out requirements for personalised limit setting and universal caps that apply to a player account, not limited to:
  - daily spend
  - monthly spend
  - top-up transfers
  - total balance limit
  - maximum pay-out
- limit setting that:
  - takes effect immediately
  - can apply a delay when increasing maximum spend
- the ability for customers to access information about their cashless play data, including activity statements in real-time
- mandated breaks in play after set time periods.

Information about additional player protection features should be supplied as part of an application (see 7.1), including but not limited to:

- automated risk monitoring as a gambling harm minimisation tool
- features to enhance informed choice and decision-making
- real-time player messaging, interaction and information regarding their gambling trends.

## 5.3 Player protection feature design

The following design features and practices may assist in promoting a user interface/user interaction that achieves consumer benefits from the player protection mechanisms available in the system.

- Clear and prominent instructions/prompts that actively encourage engagement in consumer protection features.
- Communication materials should use positive or neutral language associated with the take up of features, and include action-focused statements, for example 'set a limit', 'take a time out'.
- Fund withdrawal should be easier than deposits. Deposit and transfer options should prompt informed player decision making (such as a blank box) rather than defaults or anchors, with features such as 'transfer all' avoided. Messages should require positive reaffirming.
- Additional player effort should be required for player protection opt-out options (where

supported) and changes to defaults.

- Tools to personalise player protection features should be designed to encourage informed player decision making, such as blank inputs for loss and other limits, or low default limits/anchors.
- Activity statement design should include images/illustrations of net summaries of spend, to communicate gambling intensities, and be easy to understand
- Support services information and links should be readily accessible and prominently displayed.
- Fund sources (for example, number of cards able to be linked) may be limited.

#### 5.4 Interface with external systems

The communication between the digital wallet and the gaming system must be secure in accordance with industry best practice standards. The solution must also only allow communication to a single merchant (i.e., the solution can only be used to fund the gaming system, and vice versa, with no other retail transactions permitted).

The platform must be capable of:

- verifying players against exclusion schemes, including multi-venue exclusion databases (where available)
- restricting excluded persons from using digital payment platforms to make gambling transactions
- initiating self-exclusion
- providing information about support services.

#### 5.5 Additional services

- Additional value-added services must not degrade or interfere with core functionality of the digital payment platform to manage safe cashless transactions and implement player protection.
- Marketing or promotional activity relating to digital payment platforms should comply with industry best practice harm minimisation standards and codes of practice.
- Player/digital wallet holder data should not be used to promote other online or digital gambling systems, including free-to-play gaming.
- Players should not be provided with inducement to sign up, to continue to gamble additional funds, or to keep a player account open/active.

#### 5.6 Data privacy

- Data collated, backed-up or stored must be de-identified and comply with the *Privacy Act 1988* (Cth).
- De-identified monitoring system data relating to gaming system transactions and gaming play must be accessible to OLGR (for example, data relating to transaction amounts, time of bets placed, general trends, and limit and break setting uptake).
- Disclosure of identities and data relating to use of digital payment platforms should comply with requirements under privacy legislation, the *Gaming Machine Act 1991* and the *Casino Control Act 1982* where relevant.
- Licenced venues and operators are required to notify consumers of additional information that may be collected about them when using cashless methods and how this information may be used.
- Applications should outline the data policies that apply to a player's use of a digital payment platform, including but not limited to right to information, and right to be forgotten (see section 7.1)

## 5.7 Industry standard security features:

- Digital payment platforms must maintain up-to-date industry standard security features to ensure funds cannot be accessed or used by third parties and unauthorised persons.
- Data must be securely managed in accordance with ISO/IEC 27000 family of standards and other relevant financial industry standards.
- Enrolment of financial institution transaction accounts (e.g., player debit card) into a digital wallet and/or the transfer of funds to a digital wallet must be secured and authorised through up-to-date industry standard methods.
- Access to funds within their digital wallet must use industry standard access control methods (for example, username and password authentication, biometric authentication or equivalent).
- Communication and transactions between the digital wallet and the gaming system must be (at minimum) authenticated in accordance with financial industry standards and the ISO/IEC 27000 family of standards.
- The communication methods enabling players to draw down funds to a gaming machine for play and to collect winnings from play must use up-to-date industry standard and secure methods.

## 6. Financial guidelines

### 6.1 All applications (see 7.1) must provide the following:

- Details of the Australian financial service licence (AFSL) held by the financial entity providing the financial components of the digital wallet.
- Detailed descriptions of the end-to-end processes and data retained within the digital wallet app involved in sign-up, player and account verification, deposits, withdrawals, other transactions and securing of funds, identifying the responsible entities and asserting how integrity of transactions, funds and data are maintained throughout.
- Clear statement of whether the entity is required to comply with any existing regulatory regimes (for example stored value facilities or obligations under its AFSL).
- If the digital wallet has storage of funds functionality, details of its authority as a deposit-taking institution and any other relevant accreditation.
- Whether it is a signatory to the ePayments Code and what other consumer protections apply in respect of payments.
- Whether it is a signatory to the Banking Code of Practice.
- Details of which financial regulator/s oversee its conduct.
- How it complies with AML/CTF obligations and supports requirements of 5.1.
- Ability to set transaction limits and limits on linking bank cards.
- Whether it is authorised to interact with Apply Pay, Google Pay, BPAY, Visa Debit and other payment platforms.

## 7. Evaluation and approval

7.1 Applications for the approval of a digital payment platform will only be accepted from Queensland licensed monitoring operators and casino operators. Applications should be made in accordance with the [OLGR Submission Requirements \(gaming\)](#).

### 7.2 Applicants are accountable for:

- providing information about the gaming system, financial system and any other components that address functional and consumer protection requirements of this document, in particular part 5 'Digital payment platform functionality'

- the arrangement with a financial entity to facilitate a digital wallet solution that meets the standards in this document
- providing information that addresses part 6 'Financial guidelines' in relation to the financial entity, and the financial elements associated with a digital wallet product to be connected to the gaming system.

**7.3** Digital Payment Platform components and periphery systems that are identified as gaming related systems under the *Gaming Machine Act 1991* or gaming equipment under the *Casino Control Act 1982* must be approved prior to use. Such equipment will incorporate functionality that:

- communicates with a digital wallet that meets the standards in this document
- processes transactions of player funds for gambling within the gaming system
- manages player funds within the gaming system
- authorises and secures the transfers of funds to and from a gaming machine
- includes harm minimisation parameters and limits.

## 8. Revision history

Version	Changes	Release date
1.0	Initial Release	8 August 2023
Notes:		