

LOYALTY PROGRAMS—PRE-COMMITMENT FEATURES

Guidance from the Independent Gambling Authority

(document current as at 31 May 2010)

Purpose

1. Clause 6A(b) of each licensee's responsible gambling code of practice refers to approval of loyalty programs by the Independent Gambling Authority. The purpose of this document is to provide guidance about what the Authority will require.
2. Each application for approval (including manual systems) will be considered on its merits. However, applications which use card technologies and meet the requirements of this guidance will receive expeditious consideration.

Requirements

Coverage

3. A person must not be able to participate in a loyalty program unless he or she has been offered the opportunity to apply a set of pre-commitment limits (eg, daily/weekly/monthly limits).
4. In the longer term it is intended that a person must not gamble on a gaming machine without a pre-commitment limit.

Technology platform

5. Technology should be able to deliver to the criteria.
6. Technology must be interoperable with the gaming machine monitoring system and be capable of interoperability across gaming machine venues.
7. This means that if the loyalty program is offered in more than one venue, then limits set must be applied to gambling activity at all of the venues.

Pre-commitment accounts

8. There is to be one limit per participant per loyalty program.
9. Access to the loyalty program must be managed by a secure technology platform.
10. The establishment process should incorporate appropriate identity verification procedures (eg 100-point check).

Pre-commitment levels

11. The participant must be given the option of applying a set of pre-commitment limits of their choice.
12. Pre-commitment limits must be set in relation to net gambling losses.
13. In the case of new participants in the loyalty program, the option of applying a set of pre-commitment limits must be presented at the time of joining the program. In the case of existing loyalty program participants, the option must be presented within 8 weeks of the commencement of the requirements of clause 6A(b) of the responsible gambling code of practice.

Pre-commitment periods

14. As a minimum, pre-commitment limits must be able to be set for fixed periods of 24 hours, 7 days and 4 weeks.
15. Providers are not restrained from providing other (additional) pre-commitment periods.

Activation processes

16. Loyalty benefits may not be accumulated until the participant has set a pre-commitment limit or chosen not to set a pre-commitment limit.
17. Providers must contact participants who have chosen not to apply a set of pre-commitment limits at least every 6 months to offer the choice of applying a limit.
18. A decision by a participant to increase a pre-commitment limit must not take effect until the limit period has passed (eg, for a daily limit, 24 hours; for a weekly limit, 7 days).
19. A decision by a participant to decrease a pre-commitment limit must come into effect as soon as possible.

Activity Tracking

20. Participants must be provided with regular tracking of their play against their limits (such as by a display on a card terminal). This activity tracking must be provided to all participants regardless of whether or not they select pre-commitment.
21. Providers should provide participants activity statements. Activity statements should be provided—
 - (a) for each calendar month in which there has been activity on 25 or more days; and

- (b) for each period of consecutive calendar months (up to three calendar months) in which there has been activity on more than one day (which statement may be combined with a statement required by paragraph (a)); and
 - (c) at least once in each period of 12 months following the provision of an account statement.
- 22. Providers should, in addition to activity statements required above, provide an activity statement upon request for the activity period nominated by the participant.
- 23. An activity statement must be provided in writing—
 - (a) if the participant elects to receive the statement by email and the provider is able to transmit it—by email; or
 - (b) by post or some other form of physical delivery.
- 24. If the provider offers to provide activity statements by email and a participant elects to receive them by post or some other form of physical delivery, the provider is not prevented by this condition from recovering the additional cost occasioned by the mode of delivery.
- 25. An activity statement must include, for each day of activity since the preceding activity statement, the dollar values recorded in respect of the loyalty program—
 - (a) as having been bet; and
 - (b) as having been won—
 - at each venue where the loyalty program was used.
- 26. Participants must be provided with a spending statement for each calendar month in which there has been play on 2 or more days.
- 27. Spending statements must also be provided upon request and, if no statement has been provided for a year, annually.
- 28. Spending statements may be provided electronically.
- 29. Spending statements must include details of each transaction since the last issued statement, including the amount, date, time and a description of the transaction.

Promotion of pre-commitment

- 30. Gambling providers must promote the availability of the ability to set pre-commitment limits.

31. At a minimum, pre-commitment must be promoted—
- on any brochures, pamphlets or marketing information (other than advertising) that provides information on how an account may be established;
 - as part of the welcome pack (however described) provided to a participant upon account establishment;
 - on the homepage of the gambling provider's website;
 - at each cash-handling point in the gaming machine venue (including ATMs);
 - on account balances and statements; and
 - on any other communications with participants.