SECTOR SIGNALS REPORT / 03

Cashless Gaming

Risk, opportunity, and design choices



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Six reports.
One evolving industry.

THE SERIES IN BRIEF

In this six-part series, the **Responsible Gambling Council** shares the emerging trends most affecting the global gambling industry. Each report draws on jurisdictional evidence from leading markets and unpacks what those shifts mean for operators, regulators, and policymakers.

WHO IT'S FOR

Operators
Strategy, product, and compliance leads

Regulators
Standards setters and supervisory bodies

Policymakers
Public-health and policy decision-makers

INTRODUCTION

From cash to code.

Land-based venues have long used ticket-in-ticket-out vouchers and account-based play; newer cashless options, such as bank-linked wallets and mobile apps, now extend these on the gaming floor. Adoption accelerated through COVID-19, and several regulated markets now permit some form of it. Cashless technology is not protective by default; the design choices made at implementation determine whether it strengthens player protection or erodes it.

FOUR COMMON METHODS

E-wallets — Low friction
Bank-linked, one-click top-ups

TITO vouchers — Distorts wins
Tickets replace cash at the machine

Card and app play — Multi-fund
Multi-source funding, fewer breaks

Cryptocurrency — KYC risk
Anonymous, volatile, KYC-light

Three forces shaping cashless gaming

Regulators, operators, and responsible gambling practitioners each weigh three factors when assessing cashless wagering: the risk it introduces, the opportunity it creates, and the design choices that decide the outcome.

01

Risk

Removing friction from payment cuts the natural pauses that helped players stay aware of spend.

02

Opportunity

Every transaction is data. Operators and banks can spot harm earlier, push real-time warnings, and apply financial risk safeguards.

03

Design choices

Mandatory limits, off-floor kiosks, cooling-off periods, and keeping gambling funds in a dedicated account separate from everyday banking rebuild the friction that physical cash used to provide.

PILLAR 01

Less friction. More risk.

Cashless removes the natural stopping cues that come with handling money. Pain of paying drops and sessions can extend. Depending on the design, players may find spending and accumulated losses less noticeable.



BEHAVIOURAL EVIDENCE

The pain of paying engineered out.

Researchers call it the **pain of paying**: the small psychological friction that comes with handing over money. Cashless wagering quietly removes it. Stored payment credentials, saved payment methods, and instant account funding each strip out a stopping cue that physical cash used to provide. The result is faster funding, looser limits, and shorter pauses between sessions.

MECHANISM

Lower payment friction, increased impulsivity, longer play. The same pathway shows up across e-wallets, saved payment methods, and card-based EGMs.

WHAT CHANGES

Pain Of paying drops

Digital balances obscure what each tap actually costs the player.

Spend perception distorts

Stored balances feel like play money, not real spend, even when they are net loss.

Sessions extend

No trip to an ATM, no break in play, no reset moment.

PILLAR 02

Visible money, visible risk.

Every transaction in a cashless system is also data. The same loss of friction that increases risk also gives operators, regulators, and banks a new kind of visibility. That visibility creates the chance to detect harm earlier, design smarter financial risk safeguards, and surface real-time guidance at the moments that matter.



OPPORTUNITIES

FINANCIAL MARKERS OF HARM

Where the money tells the story.

Cashless platforms produce continuous transaction data, which means financial behaviour is no longer invisible. Research points to four signals as the earliest and most reliable indicators of elevated gambling risk and increasing risk of harm. Each is observable in any modern wallet system, and each suggests a specific design response.

FOUR SIGNALS

01 **Withdrawal cancellation**
Player requests a payout, then cancels it to keep gambling.

02 **Declined deposits**
Bank rejects a transaction.

03 **Playing through wins**
Winnings stay in the wallet and feed straight back into play.

04 **Multiple small deposits**
Repeated micro top-ups within a single session.

Data becomes a harm-reduction tool.

Spotting a signal is only the first step. Three checkpoints turn those signals into timely protection.

01

Capture

Every deposit, withdrawal, and session pattern lives in the platform's transaction log, time-stamped and account-linked.

02

Detect

Pattern-recognition models flag escalating stakes, chasing behaviour, and frequency shifts within hours of onset.

03

Respond

In-session prompts, bank-side financial risk safeguards, and warm hand-offs activate as risk indicators rise.

AUSTRALIA



Cashless EGM trials in NSW and Tasmania.

Several Australian states are piloting account-based cashless systems on electronic gaming machines. Tasmania's state-wide rollout and the NSW trial both centre on mandatory identification, customer-set spending limits, and real-time alerts for risky play. The shared goal: shift EGM play toward verified, account-based systems where play can be paused, limited, or flagged the moment behaviour shifts.

NSW Cashless Gaming Trial Final Report; Tasmania Liquor & Gaming Commission, 2024

HARM REDUCTION BY DESIGN

Mandatory ID verification

Account-based player identification. Players establish their identity through a registered account before play.

Pre-commitment controls

Player accounts support limits set in advance to help manage gambling expenditure.

Real-time risk alerts

In-session prompts surface when play patterns shift.

Auditable transaction trail

Account-based play can improve transaction visibility for harm-minimization and AML purposes.

PILLAR 03

Re-engineering the pause.

Cash comes with built-in friction: the trip to an ATM, the visible stack of notes. Cashless systems must put that friction back on purpose, through default limits, account separation, cooling-off periods, and away-from-floor decisions about money.



IN PRACTICE

Putting friction back, on purpose.

Jurisdictions and research behind each of the four design patterns.

01

Default limits

Deposit and loss limits set automatically at signup: opt-out, not opt-in.

WHERE IT'S IN PLACE

Victoria (AUS): mandatory carded play phasing in from Dec 2025, with loss limits and a A$100 load-up cap.

Norway (Norsk Tipping | For Casinos): mandatory monthly loss caps of NOK 20,000 (25+); lower caps for under-25s since 2023:

- **NOK 2,000** for ages 18–19
- **NOK 3,000** for ages 20–21
- **NOK 5,000** for ages 22–24

Crown Perth (WA): carded play with binding limits (Dec 2025); 12h/day and 28h/week caps, mandatory 15-min break every 3 hrs of continuous EGM play.

02

Cooling-off periods

Time delay between adding funds and being able to use them, even on the same card.

WHERE IT'S IN PLACE

Crown Perth (WA): any increase to a loss or time limit takes effect only after a 7-day cooling-off period.

03

Off-floor top-ups

Funding kiosks placed away from the gaming area, requiring a deliberate walk to refill.

WHERE IT'S IN PLACE

NSW (AUS): cash dispensers must sit 5+ metres from gaming area entrances and exits (Jan 2025); no gaming signage visible from them (Jul 2024).

Sweden: slot machines may not be placed next to cash machines and must stay visible to staff (SIFS 2025:1, Dec 2025).

04

Wallet separation

Wins, especially large ones, paid out of the play balance so they can't be instantly re-bet.

WHERE IT'S IN PLACE

Victoria (AUS): machine credits of A$2,000+ paid only by cheque or EFT (EFT held 24h), never cash.

NSW (AUS): prize money over A$5,000 paid by cheque or delayed EFT, not cash.

CONCLUSION / WHAT THIS SIGNALS

Design decides the outcome.

Cashless is not safer or riskier on its own. The system around it sets the direction.

01

Risk is a design output

Reduced pain of paying, distorted spend perception, and faster funding flow from product decisions, not from cashless itself.

02

Data becomes the tool

The same transaction stream that creates risk also offers a promising source of early harm-detection signals available.

03

Friction must be rebuilt

Default limits, off-floor top-ups, cooling-off, and wallet separation replace the natural pauses that cash used to provide.

HOW RGC CAN HELP

Our Advisory Services team partners with operators, regulators, and stakeholders to embed effective safer gambling practices, drawing on RGC's research, expertise, and decades of experience.

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