

INTRODUCTION:

The provision of Automatic Teller Machines (ATMs) and Electronic Funds Transfer at Point Of Sale facilities provides valuable and secure services to RSL members and Sub-Branch patrons, particularly in regional and some metropolitan areas where traditional financial institutions have withdrawn services or the facilities do not exist. The Victorian RSL Sub-Branch network is mindful of its obligations in providing cash services to patrons in a controlled and secure environment. To meet these obligations, the RSL has at all times been mindful of the Government's policy to regulate the placement of ATMs, the banning of credit to patrons, and the limit on cash withdrawal transactions.

The RSL recognises the importance of identifying practical and effective strategies to assist in the minimisation of harm that gaming can cause and strongly believes that the particular role that the RSL fulfils across many communities across the state and the specific card-based members programme introduced by the RSL lends itself responsibly to a modified approach to a complete ban of ATMs at RSL Sub-Branches with gaming machines without compromising government policy objectives.

OVERVIEW OF THE RSL SUB-BRANCH NETWORK

The RSL Sub-Branch network provides a hub for its local community and with continuing facility improvements RSL Sub Branches are becoming a more popular attraction for a broader range of demographics that see the RSL as an attractive, secure and cost effective place of entertainment. The Sub-Branch network also makes a significant economic contribution to local communities both as employers and as a source of welfare and community support. There are 110 licensed Sub-Branches in Victoria including 70 Sub-Branches who are licensed to operate EGMs.

The RSL Sub-Branch network is spread geographically throughout the State and caters for some 300,000 plus members state wide. The RSL has recently introduced a card-based programme where the network offers reciprocal rights to all Service, Affiliate and Social members of the Victorian Branch of the RSL, which allows a member from any Sub-Branch to visit any other Sub-Branch. Financial members can only access reciprocal rights by using their RSL membership card. There are approximately 120,000 member cards in use. All members who carry this card gain access to reciprocal rights and the associated benefits provided by participating Sub-Branches statewide.

The network provides a variety and broad range of services including food, beverage, gaming and entertainment, in addition to sporting activities, social functions and outings. A large proportion of Sub-

Branch membership is in the 60 plus age demographic which is a true reflection of the core membership based on the objectives of the League and the role the RSL plays in each of these communities.

Such persons are specifically provided for by the RSL, and obviously include many World War II Veterans, or their widows or dependants. We cater for and provide particular services tailored to the elderly including the conduct of day clubs, exercise classes, the facilitation of minor household maintenance, social outings, subsidised meals and entertainment together with specific veteran needs such as welfare and pension advisory services. It is the RSL's experience, and it is broadly acknowledged, that the role of the RSL plays is a very significant part of the daily routine of our aging membership and in particular improves their physical and emotional wellbeing by reducing the risks of isolation, which can often occur in many elderly persons.

The RSL sees this as an important part of its Charter and is of the view that Sub-Branches are a hub for and the major provider of such activities in many areas. The RSL also provides a safe and secure environment, which is particularly important to women, the broader community as well as the elderly.

The Victorian RSL makes a significant contribution to each of its local communities through its commitment in supporting the ethos of the RSL through its Sub-Branch network. The RSL also provides a list of intangible benefits such as fostering social inclusion, improvement in life for the aged and embracing the younger generations. There is a greater emphasis on education and community awareness of the outstanding contribution and the values the RSL movement has stood by together with the impact it has had on those thousands of veterans and their families who have relied on the RSL in their time of need.

RSL Sub-Branches are not-for-profit entities charged with the responsibility of distributing surpluses to the broader community whilst being mindful of their core objectives to watch over the Veteran community and attending to the patriotic and commemorative activities in each of our communities. Because RSL Sub-Branches respond to community needs rather than economic return they often are the source of key investment in local capital expenditures and infrastructure within their local region many local community and sporting clubs rely solely on the support of their local RSL hence our ongoing commitment to numerous local charities and community groups.

In Victoria last year the RSL Sub-Branch network donated over \$6.5 million in cash and kind to charities and community groups underpinned by our band of volunteers who provided in excess of a one million

hours last year. Without this ongoing commitment and investment many community groups and supporting activities would not be achievable.

The Victorian RSL network has been developed as a result of the introduction of gaming into this state and as a result the RSL has adopted and created a local community hub where each Sub-Branch provides a range of services and facilities that are tailored to meet the demographic and social needs within that local government area.

In early 2001 the RSL Network entered into a Service arrangement with First Data International to install ATMs into Licensed Sub branches throughout the state. As a result of this agreement we currently have 67 ATMs installed in 66 Sub-Branches, which are operated by a nominated third party provider who charge card holders a transaction fee for debit and balance enquiries.

We have been able to provide a low cost service to our members with access to cash withdrawals in a secure, convenient and compliant environment and to ensure that Sub Branches have the capacity to protect the safety and integrity of our business.

This initial roll out of stand alone ATMs was done with a number of key objectives in mind to provide a more efficient and safer transaction for both the consumer and the ATM provider and to replace the manual EFTPOS cash transactions which had a major element of physical risk of unsecured cash holdings at any one time, and the process required a manual interaction for all cash transactions and cash handling internally. This new improved service has fulfilled the needs of RSL members and patrons who access this service.

Since the introduction of the standalone terminals the average transaction from an ATM located inside an RSL is \$107 per transaction, the network average for metropolitan RSLs is \$108, and in regional Victoria is \$104 per transaction, which is approximately 50% of the maximum amount of \$200 per transaction. We are unable to provide specific data as to the direct amounts of money spent internally at each Sub-Branch or in each of the following areas of our business, which includes purchasing food, beverages, gaming and entertainment.

The RSL membership card has magnetic swipe encryption and has the functionality for members to either be identified as a self excluded person, or in the alternative to be excluded from the use of ATM facilities. It is submitted that a number of members may wish to continue to play gaming machines, but desire to be effectively barred from the operation of an ATM whilst on the premises. What we have

been able to ascertain from our network is that there is a significant number of persons who do use a ATMs at an RSL as part of their weekly living routine and not necessarily for gaming purposes.

The nature of the conduct of modern banking is such that there is a strong move by Banks to encourage their customers to use ATM facilities to reduce the bank's cost of operations. At all Sub-Branches, both in suburban Melbourne and the country, there are a significant number of older members who are not confident using ATMs, particularly in public places. In a number of cases this relates to the matter of the technology of the ATM, and there is also significant evidence where there is a fear particularly by older persons in using ATMs in a public place as it represents a security risk. The perception of such people, which is supported by various media reports from time to time, is that the use of ATMs in a public place is inherently unsafe. That is particularly so for older members who feel somewhat exposed when they are withdrawing money from an ATM in a non-secure environment. Whether such fear is well founded is not the point, it is the general apprehension held by a significant number of persons particularly within our aged community and persons who are disabled. An RSL Sub-Branch is by definition not a public place as access is restricted to members and visitors.

Further, with a number of the elderly members of the Sub-Branches, they seek staff assistance to operate the ATM and assist them as to the appropriate withdrawing of funds to enable them to attend to their daily needs. This is an important matter for the older members of the Sub-Branch as it enables them to continue to carry on their daily lives in the community, and the Sub-Branch sees such assistance as part of its welfare role. Many elderly members are brought to the Sub-Branch by friends or relatives and find it helpful to be able to use the ATM to withdraw all necessary monies to attend to their normal living expenses. This is important for members who cannot drive or who are otherwise disabled or socially disadvantaged.

RECENT HARM MINIMISATION AND OTHER INITIATIVES BY THE RSL

Over a period of two years, the RSL has been providing a programme specifically established to assist management, staff and committees at RSL Sub-Branches and some members in relation to personal or trauma related problems.

The RSL has established a counselling service operated by the Trauma Centre of Australia. This counselling service relates to a variety of personal problems such as excessive consumption of alcohol, drug use, domestic violence, family breakdown, as well as problem gambling. The Trauma Centre directs all enquiries made to it by telephone to the appropriate counsellors or service providers with the

cost of this service borne by the RSL. In its trial phase the programme has been most successful and the RSL has decided that it is now appropriate to extend this programme to all RSLs and to all members of RSL Sub-Branched. The program is at the present being introduced with the substantial cost of this initiative borne by the RSL Sub-Branch network.

Further, the RSL has now established an on line real-time membership data base system which also incorporates the production of the magnetic swipe membership card which is required to be carried at all times by a member to obtain access to an RSL Sub-Branch and which operates across all RSL Sub-Branched in Victoria and provides validation for access for reciprocal rights. The membership card has the capability to be swiped at a RSL member kiosk upon entering a licensed Sub-Branch anywhere in the state this transaction will manage and monitor a number of new initiatives the RSL is seeking to introduce into its network in the near future.

1. Interrogates and validates the financial status of a member
2. Validates member information for a reciprocal member visiting a host Sub Branch
3. Denies access and entry to a member based on disciplinary matters or a range of member self imposed exclusion initiatives.
 - Activity reminder Example – gambling or drinking habits
 - Members 30 day lock option
 - Member Access Blocker
4. Provides Static and electronic messages encouraging appropriate social behaviour and activities
5. Member Data Tracker Reporting tool

PROVIDING A SERVICE WITH INTERGITY

Considering this information, it is submitted that RSL Sub-Branches would seek to obtain a conditional exemption in relation to the proposed prohibition of ATMs in licensed venues due to be introduced in 2010. For the reasons that are previously set out, it is proposed the following conditions be placed on ATMs in RSL Sub-Branches:

1. ATM facilities would only be available to and accessible by current financial Service, Affiliate and Social members of the RSL who hold an approved RSL membership card. This would include RSL members exercising reciprocal rights.
2. All ATMs would be located either in an area that can only be accessed by use of a members card, such as a member's only bar, or in the alternative where that is not able to conveniently occur, such ATM would be placed in a restricted space access to which can only be obtained by the use of the RSL members card and which is viewable from any part of the gaming room. NB. The RSL membership card will be able to be programmed in a manner that would effectively deny that member access to the area where the ATM will be situated.
3. The access to restricted areas would be monitored by electronic swipe access panels or card readers.
4. All RSL membership card shall enable the encryption of the card for members to either be identified as a self excluded person, or in the alternative to be excluded from the use of ATM facilities. It may be that a number of members wish to continue to play gaming machines, but desire to be effectively barred from the operation of an ATM whilst on the premises.
5. All ATM screens would be programmed to provide responsible messages.
6. All ATM's would produce a receipt that will have printed on it a suitable responsible gaming message.
7. That the ATMs will be programmed only to dispense \$20 notes up to a maximum of \$200.00 in any one transaction and \$400.00 in any one day.

We also note that the use of the RSL membership card is common across the whole of the Victorian RSL network and any encryption on the card to restrict access will apply to all RSL Sub-Branches in Victoria.

It is submitted that RSL Sub-Branches know their members and that members are the reason for the Sub-Branches' existence, rather than an existence for commercial profit as is the case with a Hotel operator.

Considering the above it is submitted that this proposal will substantially meet the objectives desired by the government and will still allow the RSL to carry out important social functions for the assistance of RSL members of the community.

In making this submission, the RSL reaffirms its commitment to its members, and to assisting members with the many challenges that they face particularly the aged and disabled in our communities.