

Statutory Review of BetStop – Submission

May 2025

Introduction

The Alliance for Gambling Reform and Wesley Mission are pleased to provide our feedback as part of the Statutory Review of BetStop. This submission is intended to support the information already provided directly to the Reviewer by the Alliance for Gambling Reform.

Both The Alliance for Gambling Reform and Wesley Mission are keenly focused on reforms to gambling regulation that result in a reduction to gambling harm.

The introduction of BetStop in August 2023 has been welcomed by both organisations, and the communities we work with. This review provides an opportunity to consider the first 18 months of the Register, and whether the Register has been successful in providing a simple and effective way for users to stop gambling and prevent those who have registered from receiving marketing or inducements whilst self-excluded.

Authors

Wesley Mission

Wesley Mission, one of Australia's largest Christian non-profit community organisations, operates over 120 programs across 144 locations, and our core mission is to assist those in need. We acknowledge that we currently operate and manage the NSW Gambling Helpline and hold the GambleAware contract for Northern Sydney and the Central Coast, providing gambling counselling and community engagement services.

Separately to those services, gambling reform is a key component of the Board endorsed advocacy program of Wesley Mission. Our CEO and Superintendent Rev Stu Cameron sat on the NSW Independent Panel for Gambling Reform. We are routinely included as key stakeholders in government consultation around gambling reform.

Currently over 40 faith and civil society organisations have joined the Wesley Mission gambling reform campaign, collectively representing hundreds of smaller congregations and local level organisations.

Alliance for Gambling Reform

The Alliance is the only national peak body working to reduce gambling harm. We have over 60 supporting organisations in our network and 23 leadership local councils in Victoria who have an interest in reducing the exponential level of gambling harm in Australia.

We are a registered health promotion charity and are 100% funded by donations from individuals, foundations, trusts, local government and other sources that do not have ties to the gambling industry. We are not affiliated with any political party.

The Alliance for Gambling Reform has long advocated for public health reforms that are evidence-based and community-backed with the sole purpose of reducing and preventing gambling harm in Australia. Online gambling is increasingly becoming one of the biggest health issues we are facing as a country.

Consultation Response

What aspects of the Register's regulatory framework work well?

- All users who have engaged with the Alliance report that the process for registering is simple and quick.
- The Alliance has also found during testing that the process is easy to follow and that the registration quickly takes effect to prevent the ability for the person registered to make bets using an account registered in the same name.

Are there any gaps or opportunities for improvement in the Register's regulatory framework?

Blocking registrants from using interactive wagering services

- The Alliance has found when testing BetStop, that whilst the registrant is blocked from using the interactive wagering account, there is no reason given by the provider for blocking the account. When attempting to use the account by transferring funds or placing bets, an error message advises calling the wagering provider to discuss your account.

Recommendation 1: Require uniform messaging across wagering providers when a registered BetStop participant is seeking to use or open an online wagering account. This could include information such as:

"You have signed up to BetStop, the National Self-Exclusion Register, and are unable to use or open an account with online wagering providers. To talk to someone about your gambling, and get help, call Gambling Helpline on 1800 858 858"

Identification and verification

- Identification and verification procedures have been frequently raised by users as areas that need to be strengthened. The ability for those registered to start accounts with wagering providers using other people's details (such as family members), or to use an alternative phone number and email address, has been highlighted by users as a risk for those who have experienced gambling harm.
- Users report it is possible to trick the system by using alternative ID information, such as different phone numbers, email addresses and variations on their first name and middle name.
- Testing the sign up process has shown that using a Medicare card as ID is flawed, as there are often two adults on Medicare cards, with those two adults owning identical copies of the card, with no way of differing which persons card is being used.

Recommendation 2: Use only photo ID (passport or license) as a method of proof of ID.

BetStop only applies to licensed wagering services

- The register only applies to what are currently considered licensed interactive wagering services. This should be extended to other forms of online gambling, including KenoGo and online foreign matched lotteries which have more in common with interactive wagering services in terms of their frequency, than land-based lotteries, charity lotteries and Keno.
- A register that allowed users to also block from other types of gambling products, such as land-based racing and wagering, as well as pokies would provide greater protection from those at risk of harm from gambling. A 2022 Australian Gambling Research Centre study showed that among those who reported gambling in the past 12 months, the average number of products gambled on was 2, but around one-quarter (23%) of respondents reported gambling on 6 or more different products.

Recommendation 3: Extend BetStop to other forms of online gambling products.

Recommendation 4: Work with States and Territories to support compatibility between BetStop and land-based gambling self-exclusion registers, to provide the ability for a single user to be able to simply and effectively self-exclude across any selected gambling products.

Are the protections around information sharing and confidentiality requirements fit for purpose?

- Voices of lived experience have raised concerns about being contacted by gambling companies, including offshore companies, via phone and email, despite having registered with BetStop. There is a concern that the personal details have been sold, shared or transferred to other companies, in particular those such as marketing companies who may not be subject to the same rules as interactive wagering providers.

How did you find the registration process, including the process to verify your identity? How does this compare with the process that wagering providers ask you to follow when you open wagering accounts? Have you identified any unintended gaps or issues in the process?

Alliance for Gambling Reform Voices of Lived Experience comments:

- “Felt the role of having a sponsor attached to your record could have been a bit more straight forward and explained better on the website.”
- “I have come to find the loopholes are massive in the BetStop processes. For it to be a true self-exclusion register, it needs to include the ability to stop contact from call centres parading as “marketing” companies but are soliciting people to gamble. My example from this year shows clearly that there needs to be serious changes to safeguard the register moving forward. I’ll add the link below to the story and feel free to take anything from it you need.” [Offshore gambling operators targeting recovered addicts while regulator does little to stop them - ABC News](#)

Recommendation 5: Prioritise strengthening regulations to restrict the sharing, transfer or sale of data from interactive wagering providers to any other companies, regardless of the type of company.

Recommendation 6: Prevent marketing or other types of companies being able to contact members of the public or those registered for BetStop, by making it an offense to contact self-excluded persons regarding marketing or promotions for or about gambling providers or gambling products.

Recommendation 7: Provide a mechanism for users to easily report calls from or contact from third-party or gambling service providers, noting that many marketers hide information that lead them to be easily identified and improve the resources available to the Register to investigate these complaints.

Is the cancellation process appropriate? Are there any other requirements or supports that are necessary for people choosing to cancel their self-exclusion?

- No users have shared with us that this is a problem.

Has registering with this service had a positive impact on your life?

- Users have reported that registration has reduced the number of unsolicited gambling company approaches they have received.
“BetStop has definitely reduced the number of unsolicited gambling company approaches I received, however, it hasn’t stopped them complete as it says it was going to.”
- Some users have told us that BetStop registration has prevented them from opening new accounts, however some users have told us that there are ways to circumvent the registration.

Do the Register Rules place appropriate obligations on the wagering industry to promote the Register?

- Members of the public and voices of lived experience regularly highlight the lack of promotion of BetStop. Even many people who work in community services and support are unaware of the existence of the register.

- A desktop review shows that providers are providing BetStop information as required by the Rules, however they tend to be located at the bottom of the webpage, in fairly small text and are not particularly noticeable.
- The general promotion of BetStop has been limited, with the Alliance not finding any promotion of BetStop outside Government webpages such as ACMA and Gambler's Help.

Recommendation 8: The Rules need to be improved to require BetStop information to be placed prominently on webpages and betting accounts, towards the top of the page, in large type and contrasting colours, with a button linked directly to BetStop.

Recommendation 9: Widespread and ongoing promotion of BetStop should be funded, supported by an increased levy to providers. This should include television, online, print and radio promotion from the Australian Government, and should be targeted particularly to sporting content, and racing content, alongside general content.

Other feedback

Alliance for Gambling Reform Voices of Lived Experience comments:

- *"It also needs to become an independent body of the government, giving them have shown time and time again they don't care about what happens to the people on the register."*
- *"My boy's male peers, 17-19 yrs old, are gambling through the night at local venues, gambling all their wages away on either poker machines, or betting apps. It is so completely entrenched now...ie "mateship", hanging with the "boys", a "social" way to connect and the marketing is extremely targeted and cleverly designed to appeal to exactly that demographic. In the same way "alcopops" changed consumption when they were rolled out. In my generation I was a 14 year old... drinking West Coast Cooler which was very clearly marketed to females and young drinkers. Peter Jackson 15s cigarettes. For \$2, clearly that was directly marketing a harmful product to young people. To try and change the normalisation of gambling products/safeguards like "BetStop" need to have the same level of sophisticated design....or the "boys" won't go near it. Anecdotally, they don't think they're "addicts" because it has been completely normalised via online gaming."*
- *"My experience is that mum, 76 yr old, would not and has not considered or tried any self-exclusionary measures, particularly not where that be via an online process."*

Conclusion

We believe that the Register has largely had a positive impact on those who have self-excluded, however some participants note issues that reduce the effectiveness of the Register, such as still receiving marketing regarding gambling products, and being able to circumvent the self-exclusion using alternative ID information.

The register has the potential to have a much greater impact on gambling harm reduction if it is extended to include more types of products, noting that many gamblers do not exclusively use interactive wagering providers.

A lack of promotion of BetStop in its first years has meant that there is limited awareness of the Register, both from the general public, community services and affected others. Extensive promotion of BetStop is critical to an effective self-exclusion register, and this should be an immediate priority.



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