



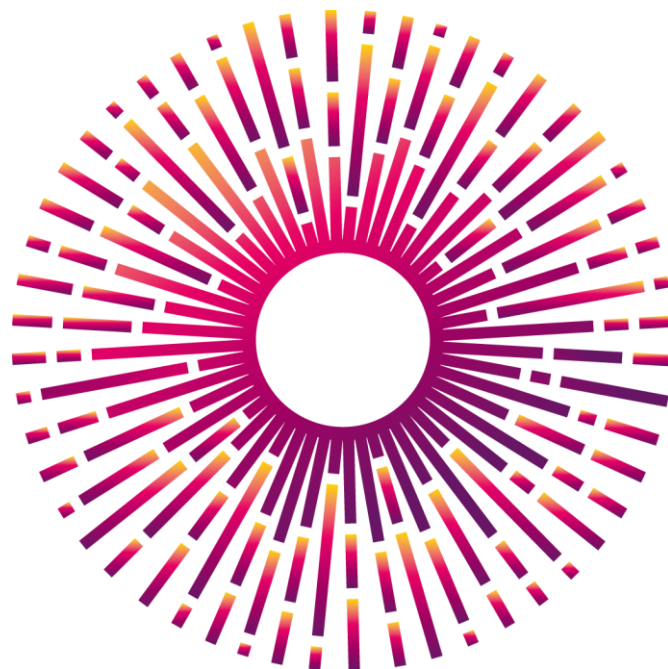
# National Consumer Protection Framework for Online Wagering: Baseline study

Final report

June 2019

Prepared by Rebecca Jenkinson, Tayyab Khokhar, Rukhsana Tajin,  
Uma Jatkari and Julie Deblaquiere

Australian Gambling Research Centre, Australian Institute of Family Studies





# Acknowledgements

The National Consumer Protection Framework for Online Wagering: Baseline study was funded by the Commonwealth Department of Social Services (the Department). Special thanks go to the Department for their support and guidance throughout the research process, to the team at Roy Morgan Research for their assistance and support with the consumer survey, and to our current and former AGRC colleagues who have contributed to this project, namely Andrew Armstrong and Cassandra de Lacy-Vawdon. We are indebted to the research participants and key stakeholders for their support, generosity of time and valuable contributions to this research.

# Contents

Acknowledgements .....	2
List of tables and figures .....	5
Executive summary .....	6
1. Background .....	10
Evaluation of the National Framework .....	11
2. Approach .....	13
Desktop review .....	13
Key stakeholder interviews .....	14
Consumer survey .....	16
Ethical considerations .....	19
3. Desktop review: key findings .....	20
Provider websites .....	20
Regulator websites .....	22
4. Stakeholder interviews: key findings .....	24
Commonwealth, State and Territory Gambling Regulatory Bodies .....	24
Online wagering providers .....	34
5. Consumer survey: key findings .....	46
Participant characteristics .....	46
Gambling participation .....	49
Online wagering participation .....	56
Other gambling participation .....	60
Wagering motivations and control measures .....	61
Gambling-related harm .....	64
Personal wellbeing .....	68
Consumer protection measures .....	69
6. Summary and future directions .....	80
Overview .....	80
Key findings .....	80
Study limitations .....	83
Recommendations for government .....	84

References.....	86
Appendix 1: Literature review.....	87
Wagering activity in Australia.....	87
Legislative responsibility for the National Framework.....	92
Literature review references.....	103
Appendix 2: Program logic and theory of change.....	107
Appendix 3: Explanatory Statements: Key stakeholders.....	109
Appendix 4: Online consumer survey.....	113

## List of tables and figures

Table 3.1 Number of providers who implemented different protective measures .....	22
Table 5.1: Sociodemographic profile of the baseline survey participants (N = 5,076) .....	46
Table 5.2: Jurisdictions and areas in Australia where participants live (N = 5,076) .....	48
Table 5.3: Number and percentage of people who reported placing bets on different activities during the past 12 months (either online or offline).....	49
Table 5.4: Key characteristics of participants who reported placing bets in the past 12 months .....	50
Table 5.5: Number and proportion of survey participants who spent money on a given number of gambling products in the past 12 months (N = 5,076) .....	51
Table 5.6: Proportion of sole participation and mean number of activities, for each wagering type .....	51
Table 5.7: Other gambling activity participation rate by activity .....	52
Table 5.8: Frequency of participation for each activity during the past 12 months <b>Error! Bookmark not defined.</b>	
Table 5.9: Methods used for each betting activity during the past 12 months .....	54
Table 5.10: Location of participation for each activity during the past 12 months.....	55
Table 5.11: Daily expenditure (\$AUD) on betting activities in the past 12 months .....	56
Table 5.12: Average proportion of bets placed using different methods in the past 12 months (N = 5,076) .....	57
Table 5.13: Comparison of current expenditure on online betting with that 12 months ago (N = 5,076) .....	57
Table 5.14: Degree of impulse and associated average proportion of the bets placed online in the past 12 months (N = 5,076) .....	58
Table 5.15: Age when first signed up for an online betting account (N = 4,079) .....	58
Table 5.16: Ever specifically chose to use/open a betting account with any offshore wagering companies (N = 5,039) .....	60
Table 5.17: Gender and age breakdowns of those offered credit benefits in the past 12 months .....	60
Table 5.18: Participation in other activities during the past 12 months (N = 5,076) .....	61
Table 5.19: Motivation behind betting online in the last 12 months (N = 5,076) .....	62
Table 5. 20: Motivation categories for betting online in the last 12 months (N = 5,076) .....	63
Table 5. 21: Self-control measures to control involvement (money or time) in online betting during the last 12 months (N = 5,076) .....	64
Table 5.22: Prevalence of at-risk gambling among survey participants (N = 5,076).....	65
Table 5.23: Prevalence of at-risk gambling, among each sex (N = 5,068) .....	65
Table 5.24: Prevalence of at-risk gambling, among each age group (N = 4,518).....	66
Table 5.25: Proportions of respondents in each risk category, by activity .....	66
Table 5.26: Proportions of respondents in each risk category, by activity .....	67
Table 5.27: Prevalence of gambling harm experienced as a result of betting online in the last 12 months (N = 5,076).....	68
Table 5.28: Responses to the question, 'How satisfied are you with your life as a whole' (N = 5,076) .....	69
Table 5.29: Proportion of participants having seen consumer protection features on betting apps and websites and/or used those features .....	70
Table 5.30: Proportion of participants who used a feature, and whether found that feature useful or not in the last 12 months.....	71
Table A1.1: Wagering expenditure by activity, 2016–17 .....	87
Table A1.2: Licensed interactive wagering providers by jurisdiction and type .....	88
Table A1.3: Proportion and number of Australians who regularly bet on race and sports, by gambling harm risk group .....	91
Figure A1.2: Proportion contributed by each domain to quality of life.....	92

# Executive summary

## Background and aims

While less prevalent than other forms of gambling, online wagering is the fastest growing segment of the Australian gambling market. The proportion of people who placed a bet on sports, racing or other events via the internet is estimated to have almost doubled between 2012 and 2018 – from 16% to 34%. Compared to non-interactive gamblers, people who gamble online have been found to be more likely to be male, younger, have higher levels of education and income, participate in a larger range of gambling activities, and experience higher rates of gambling-related harm.

As part of the response to recommendations from a 2015 Review of Illegal Offshore Wagering, a National Consumer Protection Framework for Online Wagering in Australia was developed with input and agreement from Commonwealth and state and territory governments. The intent is to bring Australian consumer protection measures up to date, to ensure they reflect best practice nationally, and to address the current regulatory fragmentation across jurisdictions. The National Framework consists of 10 consumer protection measures that provide tools for consumers and requirements for online wagering providers (licensed in Australia) to help mitigate harm related to online wagering activity.

The effectiveness of the National Framework is to be evaluated in four phases over approximately five years. AIFS was commissioned by the Department to develop and conduct the baseline study for the evaluation, prior to the Framework's full roll-out and implementation.

The baseline study aimed to address some of the gaps in the current evidence base and enhance understanding of:

- levels of online wagering involvement, prevalence of risky gambling behaviour, and levels of harm experienced
- consumer motivations to participate in online wagering and the means by which consumers seek to manage and control their wagering activity
- awareness, uptake and perceived usefulness of existing consumer protection features
- jurisdictional consistency in defining the responsible provision of online wagering
- readiness to implement and monitor compliance among service providers and regulators and any opportunities or challenges they foresee.

## Research approach

The study employed a mixed methods approach comprising:

- a desktop review to profile the characteristics of a cross-section of online wagering service providers licensed in Australia, and the state and territory regulators who monitor wagering activities
- semi-structured interviews with wagering service providers and regulators to discuss readiness to implement, monitor, report on and enforce compliance with the National Framework
- a survey of people who wager online to describe Australian consumer characteristics, levels of wagering involvement, motivations, self-management strategies, and awareness, uptake and perceived usefulness of existing consumer protection features.

Data collection for the baseline study was undertaken during March and April 2019.

## Key findings

### Desktop review

Most of the wagering providers who were reviewed were found to promote or offer one or more types of consumer protection measures via their website (at the time of review); either those already in effect as part of the National Framework, or other tools or features similar to those to be rolled out over the coming months. For example, measures such as timed limits for deposits, spending, and withdrawals appeared to be commonly offered, and the feedback from the open text consumer survey responses suggested that customers found these limits helpful to counter impulsive or excessive betting.

The desktop review revealed that a wide variety of inducements were still being offered at the time of the review, with almost all providers continuing to promote incentives for opening a betting account. Future stages of the evaluation will be able to assess whether providers have implemented the Framework measure to restrict all specified inducements in applicable jurisdictions (scheduled for May 2019).

'Responsible gambling' messages and links to gambling support services were made available by most providers, but the types and amount of messaging varied between providers. A number of consumers who completed the online survey reported that 'responsible gambling' messaging could be improved to reduce gambling-related harms among people who wager online.

At the time of the review only a minority of state and territory regulator websites contained any information about the National Framework or links to further information, but all of the reviewed Commonwealth websites provided some detail, including the National Policy Statement or a link to it.

### Stakeholder interviews

Regulators were generally very supportive of the Framework, describing it as a positive development in encouraging stronger consumer protection measures and promoting the regulation of online wagering in Australia. However, they also acknowledged there were still challenges in implementing measures consistently across jurisdictions, given different regulatory frameworks and issues of minimum standards.

Online wagering service providers were also broadly supportive of the overall Framework and the individual measures, and viewed its implementation as an opportunity to achieve greater consistency across the wagering industry in Australia. Providers reported developing internal systems and protocols to ensure efficient and effective implementation of the Framework, but described having had limited communication with some state and territory regulators (at the time of interview), which created uncertainties regarding implementation requirements. Current concerns for providers most often related to timelines and readiness, impacts on resources and business operations, and achieving national consistency. It is likely that a number of the concerns raised by regulators and wagering providers regarding implementation processes will be resolved by the next wave of the evaluation.

### Consumer survey

A self-selected sample of 5,076 adults who wagered online in Australia in the past 12 months completed the survey. Online wagering referred to electronically placing a bet via a mobile/smartphone, computer (e.g. PC or laptop), tablet (e.g. iPad), smart TV, internet telephone (e.g. VoIP), or by telephone call. Participants were mostly male, aged in their 40s, Australian-born, married or in another type of relationship, educated,

employed, and securely accommodated. Just under two-thirds reported residing in one of the state capitals, with the remainder in the territories or regional areas of Australia.

Horse racing (75%), sports (53%) and greyhound racing (32%) were the activities most commonly wagered on during the previous 12 months. The majority reported having placed bets online using mobiles/smartphones or computers, and the accessibility of online wagering facilitated betting from multiple locations, including home, licenced venues, work, friend/family home, and sporting event/racetrack. Participants reported having an average of 2.3 wagering accounts, and the average spend on each activity on a typical day of betting ranged from around \$50-\$100. The participants' main motivations to wager online were often linked to enjoyment, with the largest proportions reporting, 'I enjoy a punt', 'betting on an event makes watching sports/races more interesting' and 'betting is a social activity'.

Experience of gambling-related problems was assessed via the Problem Gambling Severity Index; around half of all participants (52%) were classified as being at risk of or already experiencing gambling-related harm; with 25% classified as low risk, 19% moderate risk, and 8% problem gambling (a higher prevalence of gambling problems compared to previous research with interactive gamblers). Other harms reported included a reduction of available spending money (24%), reduction of savings (22%), regrets that made them feel sorry about their gambling (18%), and having less spending for recreational purposes (15%).

While available consumer protection measures were generally perceived as being useful – particularly regular financial statements, clear information about terms and conditions, deposit limits and spend limits – open text responses revealed that many participants did not view themselves as experiencing gambling-related harm and felt that some of the features applied more to people 'at risk' or already experiencing gambling problems. It is possible that a lack of perceived risk of gambling-related harm among people who wager online could affect uptake of consumer protection features; this is something that could be examined in future stages of the evaluation.

## Recommendations

The intention of the National Framework is to reduce the harm of online wagering to consumers by bringing Australian consumer protection measures for online wagering up to date, ensuring they reflect best practice nationally, and addressing the current regulatory fragmentation across jurisdictions.

### Recommendations for government

We recommend the following points be considered as part of the ongoing development and roll-out of the National Framework:

- Continue to work towards harmonisation of minimum online wagering regulations across jurisdictions, while retaining the ability of jurisdictions to impose higher standards.
- Ensure continuation of the implementation Governance Committee to facilitate ongoing dialogue between jurisdictions, address and work to reconcile cross-border issues, and provide regular reports and updates on breaches of regulatory conditions.
- Continue to work towards greater transparency and improved communication between regulators and wagering providers, particularly with regard to the roll-out of future measures and any amendments to the Framework that may affect providers' compliance requirements.



- Develop consistent evidence-based gambling messages from a harm reduction perspective, with input from consumers, particularly in relation to consumers who view themselves as being at low-risk of gambling-related harm.
- Prioritise the development and implementation of the national self-exclusion register.
- Ensure individual framework measures continue to be evidence-based to prevent and reduce harm for people who wager online, with appropriate modifications as the evidence base develops.

## Recommendations for future stages of the evaluation

In terms of the evaluation itself, we recommend the following approaches be considered to enhance data collection and improve understanding of the uptake, usefulness and effectiveness of the National Framework:

- Replicate the baseline study, with some modifications or additional areas of focus; for example:
  - Desktop review: consider extending the desktop review to include wagering provider apps (in addition to websites) and investigate how features that are only accessible to account holders might be reviewed, while still ensuring ethical and other organisational compliance.
  - Stakeholder views: it may be useful for the researchers to attend the Governance Committee or industry briefing meetings (in-confidence and where appropriate) to gain a more nuanced understanding of the opportunities and challenges for regulators and wagering providers.
  - Consumer survey: consider investigating issues related to the Framework in more detail (where time allows); for example, instances where consumer protection features may not be being implemented as planned or where there may be unintended consequences.
- Include a qualitative interview component with people who wager online:
  - Conduct qualitative interviews with consumers to allow for further in-depth investigation of findings emerging from the online survey, including uptake and perceptions of the usefulness of the Framework measures.
- Investigate any relevant secondary data sources; for example (where available), the number of regulatory or licence breaches related to the Framework measures and trends in gambling-related harm data.

# 1. Background

In 2015 a Review of Illegal Offshore Wagering (O'Farrell, 2015) was conducted on behalf of the Commonwealth Government to investigate the size and scope of illegal offshore wagering, to advise on ways to strengthen the regulatory environment, and to protect Australian consumers from illegal offshore service providers.

As part of the response to recommendations from the review, a National Consumer Protection Framework for Online Wagering in Australia (National Framework or NCPF) was developed with input and agreement from Commonwealth and state and territory governments. The intent is to bring Australian consumer protection measures up to date, to ensure they reflect best practice nationally, and to address the current regulatory fragmentation across jurisdictions (Department of Social Services [DSS], 2017).

The National Framework reflects the rapid growth in the online wagering market (O'Farrell, 2015; Queensland Government Statistician's Office [QGSO], 2018) and the high rates of gambling-related harm among people who wager in Australia (Armstrong & Carroll, 2017a–c). It recognises that consumer protections for online wagering have different requirements than those applicable to other gambling platforms (DSS, 2017).

The National Framework consists of 10 consumer protection measures that provide tools for consumers and requirements for online wagering providers (licensed in Australia) to help mitigate harm related to online wagering activity. The National Framework was officially launched by Commonwealth and state and territory governments on 30 November 2018, and will be rolled out progressively over the next 18 months. The 10 measures include:

- **prohibiting lines of credit** being offered or provided by interactive wagering service providers, with the exception of certain on-course bookmakers (in effect 17 February 2018)
- **discouraging links between interactive wagering service providers and small amount credit contracts** (payday lending) for online wagering (in effect 17 February 2018)
- **reducing the customer verification period** from 90 days to a maximum of 14 days for online wagering across all jurisdictions (in effect 26 February 2019)
- **restricting all specified inducements** in applicable jurisdictions (in effect 26 May 2019)
- ensuring that online wagering **account closure or cancellation** is readily available, and accessible for all customers (in effect 26 May 2019)
- providing a **voluntary opt-out pre-commitment scheme** for deposit limits, on an operator basis (in effect 26 May 2019, with further trialling and testing proposed to enhance this measure)
- ensuring that customers receive meaningful **activity statements** on their wagering activity from each interactive wagering service provider (measure will take effect within six months of completion of trialling and testing of its features)
- providing evidence-based **consistent gambling messaging** (measure will take effect within six months of completion of trialling and testing of its features)
- providing **staff training** in the responsible service of online gambling (measure will take effect within six months of completion of an online national training competency)
- providing a **National Self-Exclusion Register (NSER)** for online wagering that ensures that those experiencing gambling harm can immediately exclude themselves from services offered by all interactive wagering service providers (measure will take effect 18 months from the commencement of the National Framework, subject to enactment of legislation and trialling and testing).

## Evaluation of the National Framework

An evaluation strategy has been designed to assess the effectiveness of the National Framework's measures in achieving intended outcomes for consumers, and to inform ongoing enhancements and refinements over time to ensure the Framework's relevance in the fast-moving digital environment (Communio, 2018). The evaluation is also designed to identify any unintended consequences arising from the implementation of the National Framework, and any weaknesses in the regulatory environment.

A literature review describing the key features of the gambling environment in which the evaluation is taking place, and summarising evidence related to evaluating the Framework, is provided in Appendix 1. The literature review describes levels of wagering participation and related harm in Australia, the current legislative and environmental context in which wagering service providers and regulators operate, and evidence underpinning the 10 proposed consumer protection measures.

The effectiveness of the National Framework is to be evaluated in four phases over approximately five years. These include a preparation and baseline phase (Period 0 [P0]), post-implementation review (P1; six months after full implementation of the National Framework), a process evaluation (P2; 18 months after full implementation of the National Framework) and an impact evaluation phase (P3; three years after implementation of the National Framework).

The Australian Gambling Research Centre (AGRC) within the Australian Institute of Family Studies (AIFS) was commissioned by the Department of Social Services (the Department) to develop and conduct the baseline study (P0) for the evaluation, prior to the full roll-out and implementation of the National Framework.

The baseline study methodology was underpinned by a program logic and theory of change (reproduced in Appendix 2), which were developed as part of the project's development and described in detail in the Performance, Review and Evaluation Strategy (PRES; Communio, 2018). The program logic plays the critical role of modelling the intended relationships between the inputs, outputs and outcomes of the National Framework, and supports the theory of change, which is the foundation for the evaluation activities, research questions and performance framework. Given the speed at which change is occurring in the interactive wagering space, it may be necessary for the program logic to be refreshed to reflect the most recent research evidence, measurement tools, legislation and the current operating environment at each stage of the four-phase evaluation.

The baseline study for the evaluation of the National Framework aimed to address some of the gaps in the current evidence base and enhance understanding of:

- levels of online wagering involvement (i.e. sports, race and event betting) among online wagering consumers, in terms of product participation, frequency and expenditure
- the prevalence of risky gambling behaviour, and levels of harm experienced, among consumers of online wagering products
- consumer motivations to participate in online wagering, and the means by which consumers seek to manage and control their gambling activity
- awareness, uptake and perceived usefulness of existing consumer protection features provided by online wagering service providers, as reported by online wagering consumers

- readiness among online wagering service providers to implement the upcoming National Framework, and the challenges and opportunities they foresee in implementing and maintaining the National Framework
- readiness among online wagering regulators to monitor, enforce and report on compliance among service providers with regard to the Framework and the challenges and opportunities they foresee
- jurisdictional consistency in defining the responsible provision of online wagering.

## 2. Approach

The baseline study employed a mixed methods approach, comprising:

1. a desktop review to profile the characteristics of a cross-section of online wagering service providers licensed in Australia, and the state/territory regulators who monitor wagering activities
2. interviews with wagering service providers and regulators to discuss readiness to implement, monitor, report on and enforce compliance with the National Framework
3. a survey of people who wager online to describe Australian consumer characteristics, levels of wagering involvement, motivations, self-management strategies, and awareness, uptake and perceived usefulness of existing consumer protection features.

### Desktop review

The first component of the baseline study involved a desktop review of wagering service provider and regulator websites. The desktop review of publicly available websites was conducted during 4–8 March 2019 and its purpose was to define and describe the characteristics of online wagering service providers and regulators and to identify any consumer protection measures that they currently implement.

### Providers

The Australian licensed interactive wagering service providers register was used to identify wagering providers to include in the desktop review. The register is maintained by the Australian Communications and Media Authority (ACMA) and it lists providers under: 1) TABs, corporate bookmakers and betting exchanges (mostly large and medium-sized providers); and 2) on-course bookmakers (mostly smaller-sized providers). As part of this study we reviewed all 23 of the large and medium-sized providers from the ACMA register (some of whom have smaller services operating under their licence), and a further six of the smaller providers who had an online presence (very few of the smaller on-course bookmakers had an online presence). Wagering providers regulated under different state and territory licensing authorities were included.

The review was conducted to obtain a comprehensive snapshot of how consumer protection measures were being implemented at the time; the criteria with which the provider websites were reviewed was as follows:

- What account features were available to customers?
  - These included customer verification requirements and time frames, the types of inducements that are available, if any pre-commitment features existed, methods of account closure or self-exclusion, access to activity and financial statements, and what types of gambling help messages were used.
- What was the availability/accessibility of consumer protection measures?
  - This included reviewing the uptake and implementation of the three National Framework measures rolled out during February 2018 and 2019, and examined any existing features that broadly reflected the remaining measures to be implemented.
- Have wagering providers made information regarding the National Framework available to their customers, and are there any obvious features that portray an awareness and readiness to implement the remaining measures?

- What similarities and differences exist between the cross-section of providers regarding the above criteria?

In addition to the 10 measures outlined in the Framework, other features that were considered were if the providers offered a dedicated responsible gambling page or link, self-exclusion options, and any other unique tools offered by specific providers.

As we were only able to review publicly available websites, it is possible that we were unable to capture certain features or tools that were only accessible to members via an online login. As the desktop review was conducted without creating member accounts with the various providers, certain features were not able to be identified on the wagering provider websites.

## Regulators

The websites of the state/territory licensing authority of each operator, Australian Communications and Media Authority (ACMA) and the Australian Transaction Reports and Analysis Centre (AUSTRAC) were also reviewed. The state/territory licensing authorities are listed below:

- Australian Capital Territory Gambling & Racing Commission
- Liquor and Gaming New South Wales
- Northern Territory Racing Commission
- Queensland Office of Liquor & Gaming Regulation
- South Australian Independent Gambling Authority
- Tasmanian Department of Treasury & Finance – Liquor & Gaming
- Victorian Commission for Gambling & Liquor Regulation
- Western Australia Department of Local Government, Sport & Cultural Industries

The criteria for reviewing regulator websites differed slightly from the providers as the focus was the promotion of the National Framework and the availability of clear information regarding the measures and the roll-out schedule.

## Key stakeholder interviews

### Participants

#### Regulators

Semi-structured interviews were undertaken with gambling regulatory bodies in each state and territory. Regulatory bodies in the Commonwealth government, responsible for the monitoring and enforcement of the National Framework measures, were also interviewed. Interviews were conducted in a four-week period from early March to early April, with information provided by regulators current at the time of interview. All state and territory governments, in addition to the Commonwealth, are represented on the Implementation Governance Committee for the National Framework. As such, all regulators were aware of the baseline study evaluation being undertaken and had agreed to participate in the interview process. A total of 10 regulators representing each state and territory and the Commonwealth were interviewed.

## Wagering providers

Wagering providers were identified via the ACMA register with additional contact details provided by the Department. A cross-section of large to medium and smaller wagering providers were interviewed, in addition to smaller bookmakers with an online or telephone wagering service. In addition, a number of peak bodies in several state and territory jurisdictions, and a national industry body, were interviewed. A total of 20 organisations (16 wagering providers and four peak bodies) were interviewed from mid-March to mid-April.

## Recruitment procedures and data collection

The Department provided a list of contact names for regulators in each jurisdiction, and for wagering providers listed on the ACMA register. In some instances, we were referred onto contacts' colleagues or used publicly available information to identify the most appropriate person to interview.

Initial contact with stakeholders was via a letter of invitation and support from the Department. This letter outlined the key features of the National Framework and how stakeholders could contribute and have their say on the National Framework's measures and implementation, including any perceived opportunities and challenges. AIFS followed this with an email invitation and a plain language Explanatory Statement which included details about the baseline study, and the aims, methodology and key questions for the stakeholder interviews (Appendix 3).

Interested stakeholders were followed up via email and telephone, and interviews were arranged at a time convenient for the participant. Almost all interviews were conducted via telephone (regulators: nine via telephone and one face-to-face; providers: 19 via telephone and one face-to-face). Interviews were audio-recorded and transcribed with the consent of participants. All participants were given the opportunity to ask any questions, seek clarification, or discontinue the interview at any time.

## Interview schedule

All regulator interviewees were asked a number of semi-structured questions exploring the awareness, planning readiness, approach, monitoring, compliance and enforcement of Framework measures. Regulators were also given an opportunity to provide general thoughts on the operation and future development of the NCPF.

Wagering providers were asked similar semi-structured questions exploring the awareness, planning, communication and compliance efforts of Framework measures. Wagering providers were also given an opportunity to raise any challenges and opportunities for them under the new measures.

## Data analysis

Data gathered through the semi-structured interviews was arranged thematically in MS Excel with all information de-identified.

For regulatory bodies, key themes and findings explored the awareness, readiness and processes, in addition to monitoring and compliance, and any challenges and opportunities faced with developing a National Framework. For wagering providers, additional questions focused on implementation, including impacts on business operations and any challenges and opportunities with wagering providers operating across different jurisdictions. Findings have been illustrated with de-identified quotes where appropriate.

## Consumer survey

A survey of people who wager online was conducted to describe Australian consumer characteristics, levels of wagering involvement, motivations, self-management strategies, and awareness, uptake and perceived usefulness of existing consumer protection features.

It was anticipated that data collected from the survey would allow for meaningful baseline comparisons between and within consumer subgroups (including at-risk cohorts). Importantly, the data will also facilitate comparisons over time for later stages of the evaluation, and comparisons with other gambling-related and population-based data sources.

## Fieldwork provider and pilot testing

Roy Morgan Research was contracted for the consumer survey data collection; including building, piloting and administering the survey.

The survey content and participant information sheet were prepared by AIFS and the survey was programmed by Roy Morgan on Confirmit. Extensive testing of the pilot survey was conducted by both Roy Morgan and AIFS staff; testing included checking that all routing and programming was correct, as well as ensuring maximum readability and usability for respondents. Minor amendments were made to the survey in consultation with AIFS.

The pilot survey was released to 413 members of the Roy Morgan online panel on Wednesday, 20 February 2019. A total of 45 respondents completed the survey, with 61 having commenced it. The average survey timing was 16 minutes, which included time to complete some pilot feedback questions.

The pilot survey was positively received by participants and few changes to survey content or programming were made.

## Survey participants

Eligibility criteria for the consumer survey included:

- currently living in Australia, aged 18 or over, and have placed a monetary bet online in the last 12 months on sports, racing, or other events.
- 'online' referred to electronically placing a bet via a mobile/smartphone, computer (e.g. PC or laptop), tablet (e.g. iPad), smart TV, internet telephone, or by telephone call.

There were no specific exclusion criteria for this study.

The main wave online consumer survey was conducted with a non-random sample of 5,076 Australians who placed wagers online with Australian service providers in the past 12 months (i.e. 'active' wagerers). Over 90% of respondents were recruited through an online wagering service provider, with the remaining sample recruited from Roy Morgan's online panel.

Key characteristics of the final sample ( $N = 5,076$ ) include: 76.8% male, 23.0% female, 0.2% other gender; mean age 47.7 years ( $SD = 14.49$ ), median age 47; 62% resident in one of the state capitals, the remainder in the territories or regional areas.



## Recruitment procedures and data collection

Survey participants were primarily recruited through online wagering service providers' customer databases. Service providers were requested to supply the survey link to their customers aged 18 years and over who lived in Australia and had placed a bet online in the past 12 months.

A mix of 25 small, medium and large-sized online wagering providers who were licenced in Australia was supplied to Roy Morgan, all of whom had been initially contacted by the Department about the research. Providers were encouraged to engage in the study, and were made aware of its relationship to the NCPF and the Department, as well as being offered a summary of the report's findings once they were released. Providers were also offered test links of the survey (to assess content, timing, etc.) prior to the final survey link being sent. Follow-up contact attempts via phone and email were made by Roy Morgan to ensure that providers were given ample opportunity to participate in the study. If no contact was made after two email attempts and three phone calls, further contact was not attempted, unless it was reinitiated by the provider. A second list of smaller bookmakers, located throughout South Australia, Queensland and New South Wales, who were believed to provide an online and/or telephone wagering service were also contacted. The vast majority of these replied that they provided a telephone betting service only and they did not have the ability to send the online survey link to their customers. No further contact was made with these providers.

In total, 11 wagering service providers (of different sizes and licence locations) agreed to participate in the study. Once agreeing to participate, providers were sent the final survey link along with an email invitation template which could be used to send to customers. Service providers were offered assistance throughout the whole data collection period in sending out the survey link and answering any queries. Providers were not given specific instructions regarding the distribution date or number of links they were required to send as we wanted to allow them to work within their existing processes (e.g. other emails being sent to customers).

Service providers started sending the survey links to their customers (via email and/or text) on 6 March 2019. All of the links remained active until the 1 April 2019. Participants took an average 15 minutes to complete the survey. Five \$200 gift vouchers were randomly awarded to respondents who completed the survey. Respondents were given the option to provide their email address to enter the draw and we ensured that the language surrounding the draw was not related to gambling or chance in any way; as is standard practice in this field.

## Survey instrument

The online consumer survey canvassed standard demographics questions (age, gender, postcode, employment, household structure, income, country of birth, etc.), levels of online wagering participation, motivations to wager, prevalence of risky gambling behaviour and harm experienced, and awareness, uptake and perceived usefulness of existing consumer protection features.

The survey collected largely quantitative data, with some open-ended text response questions. Many of the questions and scales were selected to provide data that are consistent with the standards and definitions used in other gambling research, as well as population-based studies undertaken by government agencies who are leaders in this field, including the Australian Bureau of Statistics, Australian Institute of Health and Welfare and the Department. A copy of the consumer survey is provided in Appendix 4.

## Online wagering involvement

Consumers were asked about: 1) activities/products they had bet on in the past 12 months; 2) betting frequency; 3) betting locations; 4) betting methods (e.g. online, telephone call); 5) betting expenditure; 6) number of online accounts; 7) how betting compares to 12 months ago; 8) betting motivations; 9) strategies to control or limit betting; and 10) other gambling participation.

## The Problem Gambling Severity Index (PGSI; Ferris & Wynne, 2001)

The PGSI is a 9-item instrument (used in most gambling research) to establish problem gambling risk categories in the surveyed population, and to enable comparisons between those presenting with no risk, low risk, moderate risk, and problem gambling behaviour.

## The Gambling Harms Scale (GHS; Browne, Goodwin, & Rockloff, 2017)

The Short Gambling Harms Scale is a 10-item public health focused gambling-related harm measure. Following consultation with the scale developer, we modified the question stem from a scale that measures overall gambling-related harm to one that specifically measures online wagering-related harm. Seven additional high performing items from Browne's list of 72 items were also included, and covered the primary harm domains, including Financial, Work/study, Health, Emotional/psychological, and Relationship harms.

## The Personal Wellbeing Index (PWI; International Wellbeing Group, 2013)

This is a 7-item scale used to measure satisfaction with life across seven different domains including: standard of living, health, achievements, relationships, safety, community belonging, future security, and 'life as a whole'. The PWI is a reliable and valid tool regularly applied to Australian samples.

## Gambling motivations (18 items) and behavioural self-control measures (15 items)

These two scales were derived from interviews and surveys with a sample of young (aged 18–35 years) Victorian men who wagered on sports and races (Jenkinson, de Lacey-Vawdon, & Carroll, 2018).

## Awareness and use of consumer protection features

Customer awareness, use and perceived usefulness of existing consumer protection features provided by online wagering providers were captured by 10 items that map to the measures to be implemented under the National Framework. In two additional open-ended questions consumers were asked about other protection features they believe would be useful and whether there was anything else about their experiences with consumer protection measures that they would like to describe.

## Data analysis

For the purpose of this report, descriptive analyses were carried out on numerical data using the software Stata version 15.1. The analyses mainly focussed on the proportion of survey participants responding to different response items for individual questions included in the survey. Detailed demographic analyses (e.g. investigating sex and age associations) were carried out for wagering participation and a few other measures. PWI (International Wellbeing Group, 2013) scores were calculated following the methods suggested by relevant literature.

To assist in interpreting the figures derived from these analyses, sample size and other critical information is included in the tables (Chapter 5). Responses to open text fields about the usefulness of different consumer protection measures were cleaned and analysed for frequencies using MS Excel. The responses were thematically grouped into categories according to the usefulness scale included in the question.

## Ethical considerations

All participants in this study were provided with a plain language Information Sheet which detailed the project background, survey or interview methodology and key questions to be canvassed, privacy and data security, potential dissemination strategies, and contact details for the Ethics Committee and Principal Researcher.

Key stakeholders were provided a copy of the Information Sheet (Appendix 3) prior to interview and had the opportunity to ask any questions prior to consenting to participate. They were also given the opportunity to decline to answer questions, or to stop the interview at any point. Permission was also sought to audio record the interview and to use de-identified transcripts in the evaluation report.

For the consumer survey, a link directed potential participants to Information Sheet (front page, Appendix 4), which also included a list of support services should participants wish to speak with someone about their gambling or other personal issues. Participants were also made aware that that \$200 gift vouchers would be awarded to five randomly selected participants.

Participants in the online survey were asked to describe their gambling and related behaviours. There were no expectations that serious issues would arise as a result of completing the survey; however, it was possible that responding to questions about sensitive behaviours might be distressing for some participants. The Information Sheet and the final page of the online survey included contact details for the Gambling Help Online and Lifeline. In addition, participants were able to cease participation at any time during the survey by closing their internet browser.

Online survey data collected and analysed for the purpose of this study were non-identifiable. Online survey participants who elected to enter the draw for a gift voucher provided some contact information (e.g. first name, mobile number, email) at the conclusion of the survey. Roy Morgan undertook the voucher draw and then deleted all participant contact information. De-identified survey data (i.e. a database that does not include any participant contact details) were provided to AIFS and are stored in a password-protected database only accessible to the AIFS research team. Any paper-based documentation is stored in locked filing cabinets in the secure AIFS offices.

## 3. Desktop review: key findings

### Provider websites

#### Offering credit

Following amendments to the Interactive Gambling Act 2001 (IGA) implemented on 17 February 2018, online wagering providers are no longer able to offer lines of credit to their customers (ACMA, 2019). It is also prohibited to facilitate or promote the provision of credit by a third person, for example, by a 'pay-day' lender. However, there is an exemption for telephone betting services under the IGA, where a service provider has a wagering turnover of less than \$30 million in the previous financial year and the service provider offered racecourse-based wagering services during part or whole of the previous financial year. Our review indicated that all 29 reviewed online providers, irrespective of size, did not offer lines of credit or small amount credit contracts.

#### Customer verification

The desktop review was undertaken during 4-8 March, shortly after the implementation of the third consumer protection measure to reduce customer verification times to a maximum of 14 days; at the time of the review, 17 of the 23 large providers included information on their websites that was compliant with this measure. Four of the larger providers had yet to change their policy or update the information on their website, and two did not provide any information. The verification time frames of the four providers who were yet to comply or update their customer information ranged from 30–95 days.

Collecting information regarding customer verification periods and procedures for the smaller providers was more challenging. The six smaller providers that were reviewed were selected due to their online presence; however, the websites included limited detail and did not appear to be regularly maintained. Customer verification information was only able to be obtained from two of the smaller providers; at the time of review neither appeared compliant with this measure – their verification periods were 90 and 21 days respectively.

#### Inducements, account closure and activity statements

The majority ( $n = 20$ ) of the large providers offered an incentive to open an account, with the most common reward being a bonus bet ranging from \$50–\$200. Bonus bets were required to be turned over at least once; that is, the value of the bonus bet had to be wagered and won before it could be withdrawn. Although they featured much simpler website designs, three of the six smaller providers also promoted incentives to open an account or provided event-specific bonus bets. Inducements were either advertised in large banners on the front page of the provider's website, or were included within a separate promotions tab, which was also accessible from the front page. A number of the major providers also featured promotions with live video of events or a live countdown to next jumps or matches on their front page. It must be noted, however, that the desktop review was conducted in Victoria and the same inducements may not have been visible in other jurisdictions.

Other promotions were not able to be easily viewed as providers commonly restrict access to these via a member login screen. Similarly, login details were generally required for information regarding measures such as account closure and activity statements. Where it was possible to determine if a provider offered an account closure feature, the method provided was either through an online process or by directly

contacting the operator via email or telephone. The information that was able to be obtained regarding activity statements indicated that they were accessible online and customers were provided with a choice regarding frequency of statements.

## Voluntary opt-out pre-commitment features

There were a range of pre-commitment protective measures available across the providers, both large and small. The most common feature of deposit limits appeared to be offered by all of the large providers with the exception of one. The deposit limit period ranged from 24 hours to 30 days and it was complemented with additional features such as gambling time-out and spend, withdraw, and loss limits. Several of the major providers included specific features such as 'Reality Check', which informed customers of how long they had remained logged into their account and 'Take a Break', which acted as a temporary account closure. Additional unique protective measures included onsite wagering calculators and wagering diaries. Although these features were relatively straightforward to find on the providers' websites, there was no way of assessing their features or usefulness without an active account.

## Gambling messages

Gambling messaging across provider websites remained fairly consistent in terms of the general nature of the messages, but the specific language used varied across providers. Almost all of the large providers included a dedicated page for 'responsible gambling' and support. The sections on the responsible gambling pages were relatively consistent across providers and included separate categories:

- Information on problem gambling – provided customers with an overview of what constituted problem gambling and served as a form of self-assessment.
- Advice on problem gambling – provided specific tips to avoid problem gambling including setting limits and not wagering under the influence of alcohol.
- A link or telephone number for Gambling Help Online was provided.
- Information provided for professional gambling help – this was any links or support numbers besides Gambling Help Online.
- Protection of minors – all providers clearly stated the potential risks of minors being involved in gambling activity and some included site filtering features.

The six smaller providers had little to no information regarding responsible gambling with four of them providing the number for Gambling Help Online but no other information. The limited financial and technological capabilities of smaller providers may mean that they are not able to offer all of the features of the larger providers (including wagering calculators and diaries or a live chat option with trained staff).

## Staff training

Evidence of staff training was difficult to measure through a review of providers' websites, but information regarding specific staff training was occasionally provided. Furthermore, a number of providers included a live chat feature and although these were typically for general inquires, there were some that reported that they specifically provided assistance with responsible gambling.

## Self-exclusion

We observed that all of the large providers offered customers the option to either temporarily or permanently self-exclude themselves. While the National Self-Exclusion Register is not yet available, the large and medium-sized providers offered a comprehensive self-exclusion feature where users were able to complete the process online and select a period of exclusion.

Table 3.1 provides a summary of the desktop review findings. It shows the number of providers that had evidence or information relating to each of the 10 measures included as part of the Framework. Both the large and small providers are included and it is noted where specific information was not known.

**Table 3.1: Number of providers who have implemented different protective measures**

Protective measure	Number of providers who currently have available ( <i>N</i> = 29)
Offered lines of credit	-
Offered small amount credit contracts	-
Customer verification (within 14 days)	17
<i>Unknown</i>	6
Restricted inducements	6
Account closure	15
<i>Unknown</i>	14
Voluntary opt-out pre-commitment	24
<i>Unknown</i>	2
Activity statements	16
<i>Unknown</i>	12
'Responsible gambling' messages	22
Staff training	10
National self-exclusion register (NSER)	-

## Regulator websites

At the time of review, only three out of eight state and territory regulator websites included information about the National Framework on their website or provided a link to the National Policy Statement (DSS, 2018); however, both Commonwealth websites included reference to it and provided links to further information.

## Box 3.1: Summary of findings from desktop review

- The desktop review collated information from provider and regulator websites to determine which consumer protection measures, if any, were already being implemented and to assess the potential readiness of providers to implement upcoming measures. Twenty-three large to medium-sized providers, six smaller providers, and 10 Commonwealth, state and territory regulatory websites were reviewed.
- Offering lines of credit or small amount credit contracts – none of the providers we reviewed offered lines of credit or small amount credit contracts on their website as per the legislation that was implemented 17 February 2018.
- Customer verification – the majority of the larger providers reported completing their verification process within the stipulated 14 days; however, a small number were yet to comply or update the information on their website. Verification information was only obtained for two of the small providers; at the time of review neither appeared compliant with the measure.
- Restrictions on inducements – the majority of providers, regardless of size, offered a number of incentives to open accounts or to bet on specific events; they also required a minimum turnover before any complementary funds could be withdrawn. Direct marketing was almost always aimed at customers who gave their consent to receive the material.
- Account closure – information regarding account closure was generally behind a member login although the information that was obtained from some providers suggested that both online and via direct contact methods were available to close accounts.
- Voluntary opt-out – a range of opt-out features were provided. The most common were timed limits for deposits, spending, and withdrawing. A number of the major providers also had specific features such as wagering calculators or diaries.
- Activity statements – activity statements were almost always behind a member login although some providers mentioned that statements were readily available online for customers.
- Consistent gambling messages – there was a degree of consistency with the gambling messaging across providers although there was no uniform standard. Almost all the large providers had separate pages for responsible gambling and all of them included either a link or a number for professional gambling help.
- Staff training – information regarding specialised staff training for the provision of safe online wagering services was unclear and difficult to obtain. The majority of providers made no mention of staff training although some stated that their staff were trained to provide gambling help and support.
- National self-exclusion register (NSER) – although all the large providers had self-exclusion features in place, none mentioned the NSER or any other kind of register, which is not unexpected given the timelines for implementation of that measure.
- Only three of the eight state and territory regulatory body websites contained information regarding the Framework; however, all Commonwealth websites included either the National Policy Statement or a link to it.

## 4. Stakeholder interviews: key findings

### Commonwealth, State and Territory Gambling Regulatory Bodies

#### Planning and implementation of NCPF measures

Regulators had a good understanding of the NCPF measures, the expected time frame for implementation of each measure and delineation of responsibilities between the Commonwealth and state & territory governments. Several regulators had been working on developing the NCPF principles from their inception, and the National Policy Statement (November 2018) reflects the agreed commitments of the Commonwealth government and state & territory jurisdictions.

Some regulators described being partially or fully ready to implement measures prior to the NCPF being finalised.

'[Jurisdiction] amended its legislation back in 2017 ... to implement whatever the Framework ended up to be. So before the Framework was finalised we had the power to implement.'

'Out of the 10 measures there are only two instances where we may need to have legislative amendment.'

Other regulators expressed the view that the time frames were quite tight, particularly in relation to changes that were required to be made by wagering providers for NCPF measures due to come into effect in May 2019:

'Particularly the May 2019 time frames [look a bit tight] but look that's something that operators have committed to dealing with and you know it's mainly the technical aspects on their end I guess that require some work.'

More than one regulator said that, at the time of interview, certain implementation methods were still to be determined by a few jurisdictions for measures coming into effect in May 2019.

Some regulators have a specific role in implementing and monitoring compliance of national measures that are already in effect. These regulators reported having a detailed understanding of the technical requirements of those measures, and how they are to be monitored and enforced. These regulators reported a good awareness of the NCPF overall, although they were not as focused on state and territory-related measures.

#### Technical changes required to implement NCPF measures

All regulators reported having a good awareness of the technical changes required to implement NCPF measures in their respective jurisdictions. They described implementing these measures through legislative change, regulatory amendment or changes to Codes of Practice.



'Implementation was successful in terms of the fact that those provisions implementing the measures were inserted into the [Act] ... so in terms of their implementation ... achieved on time and successfully.'

Some jurisdictions reported that they already had pre-existing legislative or regulatory gambling restrictions that partially or fully addressed NCPF measures, or required only minor amendments. For example, one jurisdiction amended legislation in 2017 allowing its responsible Minister with a clear power to issue directives to implement the NCPF, thus making it an offence for wagering providers to not be in compliance.

Other jurisdictions have amended, or plan to amend, regulations under existing legislation that addresses the actions of wagering providers. These jurisdictions noted that regulatory amendment was less onerous and timelier than amending legislation.

'It takes a long time to get Parliament to open up say, a Gaming Act which is always controversial because you know as soon as you open it up, you know people want to raise lots of other issues that they have with it.'

Some jurisdictions plan to implement measures under their mandatory Codes of Practice that govern actions of wagering providers. At the time of interview, one jurisdiction was still to determine the specifics of how upcoming measures would be put into effect under their Code of Practice.

A number of measures that have been implemented are now part of licence conditions for wagering providers in particular jurisdictions. Jurisdictions with relatively few licensees viewed this as a straightforward method to ensure compliance with the new measures:

'We'll be amending our Code of Practice and basically, the changes we make will only apply to [wagering provider] because ... our regulatory Framework only allows us to implement ... conditions and regulations on licensees that we licence.'

Some jurisdictions noted that the new licence conditions required internal technical changes by wagering providers to ensure compliance.

Some regulators said that they needed to determine how certain NCPF measures would be implemented before they came into effect in May 2020. Several jurisdictions advised that NCPF measures due to come into effect in 2020 require further trialling and development of a uniform approach, particularly in relation to measure eight on consistent gambling messaging. However, most jurisdictions were confident of implementing measures due to come into effect in May 2019, despite the relatively narrow time frames.

## Monitoring and compliance of NCPF measures

All jurisdictions reported that monitoring and compliance of NCPF measures would largely fall under existing mechanisms. Some jurisdictions have separate bodies that ensure monitoring and compliance of wagering providers through licence conditions or other requirements. Commonwealth regulators noted largely positive interactions with state and territory regulators on monitoring and compliance issues that cross jurisdictional borders.

State and territory regulators differ as to the level of monitoring of wagering providers licensed in their jurisdiction. Some jurisdictions reported taking an active approach with, for example, supervisory teams

that conduct assessments of wagering providers. Other jurisdictions rely more on reported breaches of licence by wagering providers, or on an audit approach, after which investigations may take place.

A point of difference emerged in the reach of state and territory laws across jurisdictions. Some jurisdictions reported only requiring adherence to regulations in that jurisdiction where the wagering provider is licensed (point of supply approach). Other jurisdictions extend their legal regulations to wagering providers who offer services to residents within a jurisdiction (point of consumption approach).

Regulators reported that this resulted in discrepancies across jurisdictions as to how wagering providers are regulated across state and territory borders. At least one regulator has prosecuted licensees registered in another state or territory for infringements in delivering its gambling products within that jurisdiction. Another regulator that was spoken with later in the interview time frame said they now have a process to inform regulators in other jurisdictions of breaches of their gambling provisions:

‘If the wagering service provider that is not regulated in this jurisdiction is in breach of the provisions of the National Framework, then we would inform the relevant regulator and it’s presumed that that regulator would take action. Because we have no statutory ability to take action against [a provider] that’s not licensed here.’

All jurisdictions have a range of penalties for breaches of their regulations depending on the severity of the breach. These include formal warnings, access to customer records, infringements notices, cancellation of licences, fines and civil penalties. A number of jurisdictions reported having undertaken prosecutions of wagering providers for breaches of their existing regulations, and some have highlighted the benefit of such actions:

‘We see a lot more self-disclosed breaches where they want to own up to it, and tell us what they’re doing in the first instance.’

Some regulators noted positive feedback on compliance by wagering providers for measures already in effect.

‘You know, it is in [wagering providers’] interest to know who they’re doing business with. They can’t pay out any winnings unless they’ve done it anyway, so it’s just a liability on their books until they actually know who the person is and they can actually start transacting the money. And at the same time ... they want to do the right thing.’

## Communication with wagering providers and consumers

Many regulators have been in discussion with wagering providers on NCPF measures as part of regular and ongoing dialogue. Some jurisdictions have undertaken a more formal communication strategy for existing measures. For example, one regulator undertook an education campaign for wagering providers by advising them of new prohibitions in writing and the need to modify business practices. The regulator also developed a social media campaign for consumers around major sporting events such as the Victorian Spring Racing Carnival and AFL/NFL Grand Finals.

Other regulators reported that a communications strategy or media release may be developed and rolled out closer to the time of implementation of later measures, and would be largely directed at wagering providers, rather than consumers, in light of regulatory amendments. Some regulators advised that a communications strategy for consumers would not be feasible given they have a regulatory approach that

only covers licensees in their jurisdiction, but that for some measures it would be useful for a communications strategy to be led by the Commonwealth Government in order to promote a national approach. Some regulators also noted the importance of the Commonwealth Government coordinating briefing on the NCPF for wagering providers through stakeholder forums to provide a consistent, information-sharing approach.

Although most regulators characterised their dialogue with wagering providers as positive, some jurisdictions noted that providers had raised issues with them regarding roll-out of the Framework. For example, one concern for wagering providers operating nationally has been the lack of detail regarding how measures would be implemented in each jurisdiction. This would reportedly have consequences for the internal technical changes required by wagering providers, particularly in state and territory jurisdictions that may have different standards under the NCPF. Wagering providers also conveyed concerns to some regulators about the narrow time frames for changing internal operations and business practices prior to measures coming into effect in 2019.

However, other regulators noted that the ongoing dialogue with wagering providers in their jurisdictions has meant that providers are well aware of upcoming changes:

'In terms of the wagering service providers ... we've been very open with them as to what the requirements are and they should at least understand ... the [jurisdiction's] position and they haven't come back to us and said they don't understand how they would implement any of this.'

Some regulators noted that wagering providers have viewed dialogue with them as an opportunity to lobby for exemptions from the NCPF measures:

'So [wagering provider] has approached us about that particular measure [voluntary opt-out pre-commitment], they've said it's not as strong a harm minimisation measure as [others we already have in place]. And so they are saying ... "can we be exempt from that requirement?"'

## Specific NCPF measures

### Prohibitions of lines of credit, links with payday lenders and customer verification periods

A number of national measures have already come into effect, including prohibitions of lines of credit (measure 1), prohibition of links with payday lenders (measure 2) and mandatory customer verification periods (measure 3).

Regulators noted that implementation of these measures had been relatively straightforward. Wagering providers had been sharing information on business practices in some cases for 12 months prior to implementation.

Some regulators reported that many wagering providers were already compliant with measures prior to implementation, and that changing their internal operations would not have a great impact upon their business practices.

'So we do have a bit of engagement with the big corporate and online bookmakers which are the ones that [the NCPF] really impacts. And from the information they were giving us before

[customer verification] came in, it wasn't going to be a huge impact for them ... the majority of people ... who signed up for these accounts were [being verified] within 14 days.'

'We were negotiating with [wagering providers] about the implementation and putting into effect ...from a regulatory sense they're dealing with the technical changes that need to be made and we understand that's on track.'

## Restrictions on inducements

Several regulators advised that the measure on restriction on inducements from wagering providers (measure 4) has been challenging in the context of a national Framework.

The NCPF currently establishes a minimum standard for all states and territories. However, some jurisdictions currently have stricter provisions on the type of inducements that wagering providers can offer in their state or territory. In some jurisdictions this also affects advertising of gambling products. Regulators in jurisdictions with strict provisions have advised that they do not intend to loosen their current restrictions on inducements, which may create discrepancies around inducement provisions between state and territory jurisdictions.

Some regulators also advised that wagering providers have concerns about the lack of nationally harmonised regulations on inducements. Wagering providers had raised concerns about having to offer different products, or types of advertising, in different jurisdictions. However, regulators in jurisdictions with stricter inducement provisions disputed this:

'The [wagering] operators will say to us, "Oh well you're effectively imposing a national ban because if we ... have to meet your standards for ads then basically we have to do it across Australia". And we say "No you don't. You know, we know, that you can very specifically target your advertisements to different markets so we know you can target to [jurisdiction's] market".'

'So industry is saying to us "well can't [jurisdiction] now sink down to the [minimum] inducement standard" And we've made it very clear to them we have no intention of doing that.'

## Consistent gambling messaging

There is agreement between jurisdictions on the need for an agreed definition of responsible gambling to avoid inconsistent and ineffective messaging. At present, a number of jurisdictions do not currently have a legal definition of 'responsible gambling'; however, many jurisdictions require responsible gambling messaging to be provided by their wagering provider licensees. Some jurisdictions also provide links to other responsible gambling pages or helplines from their own websites.

In addition, several jurisdictions reported that they have a clear idea of what gambling messages they promote as regulators, even if it is not articulated in legislation or regulation:

'It's basically the provision of safe, socially responsible and supportive gambling environments where the potential for harm associated with gambling is minimised and people can make informed decisions about their participation in gambling.'

A number of regulators viewed the development of consistent gambling messaging as a measure that should be primarily led by the Commonwealth Government to encourage uniformity across jurisdictions:

'If the Commonwealth comes up through its research with an appropriate message ... then that message would be the same in each state and it would be better than, "think about your choices".'

Although the focus of this measure is on 'consistent' gambling messaging, several jurisdictions noted the importance of a harm reduction approach to any gambling messages:

'My feeling that a throwaway line of 'gamble responsibly' has lost all meaning or value ... there's scope for reviewing the messaging generally to make sure that it is addressing the harm ... and identifying that there is a harm associated with gambling rather than just, you know, encouraging people to gamble responsibly.'

'I'd like to talk about things in different ways around reducing harm and responsible gambling ... I think [jurisdiction] would agree that harm [reduction] is a better approach.'

'So [jurisdiction] is moving, like a lot of jurisdictions, to a public health approach to gambling harm. And a lot of our current messaging Framework with the gambling [poker] machines don't really capture that approach.'

However, another jurisdiction noted the importance of the concept of 'responsible' gambling:

'I think in [jurisdiction] we really think that the responsible gambling issue ... does strike that balance between ... the government's commitment to preventing and minimising harm but then also acknowledging that gambling is a legitimate and lawful activity.'

## Other measures

Some jurisdictions reported that other measures under the NCPF are already in place, in part or in full, in their respective jurisdictions. One such measure was voluntary pre-commitment limits (measure 6) although uptake had been sporadic for wagering providers across the country:

'Most operators have some form of pre-commitment ... there's a huge variance between operators on take up of these measures and part of the standardisation hopefully will see that we get significant changes in that.'

Several jurisdictions noted the benefits of measures that are due to come into effect in 2020 given their reach across the country:

'The national self-exclusion registry's another one that I think should have particular benefits when it comes online.'

## Perceived benefits of NCPF

Most jurisdictions reported that that the goal of harmonising standards for online wagering across the country was a primary benefit of the NCPF, along with encouraging stronger consumer protection measures:

'I think the idea of moving to a nationally consistent Framework is amazing but I think, you know, there are challenges ahead I'm sure for everyone involved. I'm sure there will be a number of benefits to consumers ... So I'm excited about it.'

Harmonising standards would, in theory, eliminate discrepancies between state, territory and Commonwealth jurisdictions in measures to address online gambling, and provide clarity for wagering providers. It would also provide a baseline for minimum standards to promote certainty to wagering providers and an increased level of consumer protection.

'[The NCPF] provides a clear Framework for nationally harmonising harm minimisation in the online wagering space, which has not been specifically catered for to date.'

'From our perspective [the NCPF] is a pretty good thing, it brings other jurisdictions up to consistent harm minimisations, many of which we already have in [jurisdiction].'

One regulator noted the different processes jurisdictions have to bring into effect the same NCPF measures:

'If we're going from A to B to get to C, and when we get to C, we're all actually – we might have different ways of getting there but as long as we're all getting there.'

Some jurisdictions noted the benefit of having mechanisms in place to engage in dialogue with other jurisdictions, particularly around existing discrepancies in gambling regulation:

'There's also a benefit just from having a template for us to work with the other states and territories on online wagering issues. I think the Governance Committee is seen as something that will be used going forward.'

One jurisdiction noted that NCPF measures would provide minimum standards that would provide a baseline for all wagering providers:

'Some of the feedback we've had from the [wagering] industry ... there is an argument around that [the NCPF] **doesn't necessarily give national consistency but there is at least a minimum standard.**'

Other jurisdictions reported on the success of specific measures:

'Things around the inducements and the lines of credit ... with payday lenders, I think, are all great ... Making it easier for people to close their accounts I think is really important ... the exclusion register is really important to make sure people can quickly and easily bar themselves from being involved in gambling. So, you know, there's some good work that's in [the NCPF].'

## NCPF challenges

### Point of supply and consumption approaches

Several regulators reported on the difficulty of reconciling point of supply and point of consumption regulations across jurisdictions. There was some concern from point of supply jurisdictions (who regulate

only wagering providers licensed in their jurisdiction) as to the difficulty they would have in taking a point of consumption approach (regulating wagering providers offering services in their jurisdiction):

‘That’s the tricky [issue] we are working though the implementation group at the moment because really, there’s nothing [the jurisdiction] can do ... you would have to change our Act to be able to do a point of consumption model, which even if we decide to do that, it would take a number of years probably ... so **we’re sort of at the mercy of other jurisdictions to see if they are going to go down that path.**’

However, other regulators with existing point of consumption regulations have indicated they would not be reducing their level of regulation of wagering providers:

‘We really don’t care where the [wagering] operator is licensed. If the breach occurs in [jurisdiction] and it’s in breach of our regulation or our legislation ... we will go after that operator.’

When asked about the possibility of harmonising regulations across jurisdictions, one regulator noted:

‘I’ve always thought that if ... NSW and South Australia and Victoria all adopt the point of consumption **approach ... it kind of drives other jurisdictions to ... essentially adopt the same thing.**’

One regulator reported that they have the ability to regulate wagering providers operating in their jurisdiction even if they take a point of supply approach:

‘It’s kind of like we have a hybrid ... we will have a point of consumption approach to regulation where someone who is providing services to a [jurisdictional] resident we will deal with them under our codes and legislation because we have probably stricter requirements in [jurisdiction] ... But where there is a licensee who is a licensee in [jurisdiction] then we’ll obviously deal with them from a point of supply approach ... So it’s a bit complicated but we can do both effectively whereas some states are limited to one or the other.’

Another regulator noted a cooperative approach to regulating wagering providers not licensed in their jurisdiction:

‘In terms of enforcement strategies ... we only regulate one wagering provider ... if [another] wagering service provider that is not regulated in this jurisdiction is in breach of the provisions of the National Framework, then we would inform the relevant regulator and it’s presumed that regulator would take action because we have no statutory ability to take action against someone that’s not licensed here. And we did that with [wagering provider] as an example ... they were advertising in this jurisdiction in breach of our legislation and so, they were not licensed here, we couldn’t take action, but they were licensed in [other jurisdiction] so [we] informed [other jurisdiction] and they took action.’

## Consistency of standards

A number of regulators expressed reservations about implementing harmonised NCPF measures across jurisdictions. Several noted that measures under the NCPF were minimum standards, with jurisdictions

retaining the power to implement stricter existing regulations. This was particularly relevant to measure 4 (restrictions on inducements) where it is specifically written to be a minimum standard.

A number of regulators indicated that they would not be amending their existing regulatory requirements to reduce their standards:

'In the inducements space particularly ... So New South Wales won't be weakening its requirements. Neither will South Australia.'

'Jurisdictions have been very firm in saying [inducements] is a minimum standard and no one will go beneath it but there's nothing stopping jurisdictions going above the NCPF standards. So, for example, in the space of inducements [jurisdiction] ... is already above the standard and ... we have no desire or intention of coming down to that national standard because we've been above it for some time.'

Some regulators reported on feedback from wagering providers about consistency across jurisdictions:

'The Framework is not actually delivering a consistent set of regulations for [wagering providers] so ... for example, with inducements they still need to look at each state and territory requirements before they roll out a campaign. Whereas I think the hope was that there would be one set of regulations that they would need to look at.'

'There was perhaps a hope or perhaps it started off as a perception ... which I think is now being dashed amongst industry ... that the NCPF would in fact be a blanket standard and that every jurisdiction would ... have exactly the same standard.'

A few regulators said that they doubted full harmonisation of standards under the NCPF would be achieved:

'You'll have a baseline standardisation [after NCPF implementation] but then I think ... you'll have a continuation of the current basic Framework where some jurisdictions go above and beyond the baseline ... and some ... just stick to the baseline requirement so I think you probably won't get full harmonisation.'

'Conceptually [harmonisation] is a great idea. But the problem you've got is Federation really.'

## Business impacts

Some regulators with a number of smaller wagering providers reported concerns about the business impacts on their licensees, particularly in trying to address different minimum standards across jurisdictions:

'[Wagering providers] have a few concerns with being able to meet certain aspects ... in terms of changing their systems ... when you start drilling into exactly how they're going to change their systems, they are still unclear as to how each jurisdiction is going to implement the measures.'

Other jurisdictions have played down the impact on wagering providers, particularly in relation to concerns from providers relating to inducements and advertising:



‘The operators’ decided to put messaging on their advertising themselves, or because South Australia or the NT requires it, and they’ve just copied that ad for [jurisdiction].’

One regulator highlighted the difference between larger corporate wagering providers and on-course bookmakers who also fall under the definition of online wagering through telephone betting:

‘So they’re quite technologically advanced ... the corporate bookmakers not the on-course bookmakers ... I think they’ll be fine with [NCPF measures]. The big issue is going to be your on-course bookmakers and even educating them in the first case that they need to do any of this, any of the provisions that come out of [the NCPF].’

‘You know you look at the standard demographic of them: they’re older men with no online presence and have no willingness to comply with the things that government wants them to do ... very low turnover and the like ... so it’s very hard to get them to comply and actually get the message [about NCPF measures] to them in the first instance.’

## Other consequences of NCPF implementation

Some regulators have reported on the possibility of wagering providers moving offshore and enforcement of illegal offshore betting (not covered by the NCPF Framework):

‘I think when the first Commonwealth measures were put in place and ACMA were given new powers ... I personally held a fear ... lots of others held as well around you know pushing people offshore ... It’s worth noting that some of the big players have already exited the Australian market.’

However, this fear has been alleviated to some extent following the implementation of national measures under the NCPF:

‘Because of the work that ACMA and the Commonwealth have done around ... clarifying the law and actually going out and being proactive in talking to regulators in other jurisdictions ... it’s probably allayed some of those fears, although I still note that some people are being pushed off for whatever reason.’

Another regulator noted the self-interest that some wagering providers have in implementing consumer protection measures under the NCPF sooner rather than later to open other topics of discussion with jurisdictions:

‘What I think they would like to do is to start the conversation about in-play betting and they know that’s not going to happen until this Framework’s in place, and so they’re keen to have it in place sooner rather than later.’

‘So, from the wagering operator’s perspective, they’re saying “Let’s get this Framework in place, and then we can go back to talk to the government about relaxing the in-play betting restrictions”.’

## Future amendments

A few regulators thought there may be scope for future changes to the NCPF. These could include the option of making measure 6 (voluntary pre-commitment) a mandatory commitment, and reducing age verification requirements down to zero days:

'You can't play a poker machine, you can't buy a drink until you've satisfied the vendor that you are 18. I don't see why, with technology these days, we shouldn't make [online verification] zero days but that's my view of the world.'

Another area for consideration was in relation to gambling advertising:

'I think there's more that we can do ... nationally from an advertising point of view. One of the big issues that people have in relation to wagering is advertising and attraction to children ... we have you know 15 and 16 year olds ... rather than talking about football or who's going to win, they're talking about the odds of who's going to win, and that's probably a bit of a concern for the community generally.'

## Online wagering providers

### NCPF development and support

All of the providers interviewed as part of this research reported being supportive of the National Framework's intent and key measures. The main benefits identified by providers related to improving consumer protection features and developing harmonisation across the online wagering industry. The strength of these benefits was perceived by providers as underpinned by, and reliant on, a nationally consistent Framework:

'I think it's something that had to be done. I think the industry is probably focussed too heavily on growth in certain circumstances and not putting customer's wellbeing first. And I think it, you know, it's not just in Australia it's happening globally, I think. It's important that we start thinking about customers and their behaviours. That should be at the forefront of our mind.'

'It's been quite a herculean task to get to this point, but I think we've landed on – and while we might want a slight change to one or two of the things – we are wholly supportive of the NCPF. We think it will improve consumer protection outcomes. We think it will harmonise some really good quality mechanisms that we already had in place for some time and add some more. So on the whole, very supportive.'

'I think there will be a much safer environment for users of online gambling apps. I think the standardisation as much as it's been achieved, and we've obviously had lengthy discussions about where it's not been achieved, but there's still a greater degree of harmonisation than previously so that's welcome. I fundamentally think that the reforms in there in general will provide a more responsible gaming environment for the users.'

'I think it's important we look after the customers so that they can enjoy the product responsibly and over a much longer period of time.'

'The really important value I think the Framework brings is consistency ... I think it's entirely appropriate that there be a level playing field for online wagering given the fact that it is, you know, accessible by all people in Australia.'

Most providers reported that they felt that there had been sufficient consultation during the Framework's planning and development phase. Those who had been directly involved in its development were grateful for that opportunity; they described the enormity of the project and the achievements in getting to this point:

'It's been a massive project. When you consider that there's 10 measures that have, you know, degrees of intricacies that you can't see at first blush, that have then been fleshed out in tremendous detail over a number of years with every jurisdiction.'

'There was a lengthy but healthy process to try and narrow it down to the areas people could agree. There will still unfortunately be significant differences across states. But that's not through people trying to see where they could bring things together.'

## NCPF implementation

### Communication with Commonwealth and state and territory governments

On the whole, providers reported that their communication with Commonwealth agencies had been quite positive and informative, but many providers expressed frustration that there had been limited or no communication from states and territories (at the time of interview):

'The actual detail of taking the high-level principles and putting them into whether it's legislation or licensing conditions or codes of conduct, it varies depending on the jurisdiction. We don't have great visibility in terms of how that process will be resolved because although several of the state and territory jurisdictions have been quite open with industry about their plans in terms of implementation, others have been less forthcoming.'

'I don't really want to push any boundary; I just want to know what the boundary is.'

A number of providers expressed appreciation that [one jurisdiction] had made their documentation available in late 2018 and had shared it with all parties:

'It's fair to say that [jurisdiction] has been by far the leading jurisdiction when it's come to implementation arrangements. They've been highly consultative, which has been I think very welcome from the industry, and I'm aware that broadly speaking other Australian jurisdictions have agreed that they will model their implementation arrangements on [jurisdiction's] approach which is a – I think a very sensible way to do things given the time constraints and the fact that [jurisdiction] has done the heavy lifting for all of the other jurisdictions.'

'Well [jurisdiction] has been the only jurisdiction that has had a consultation process. And that's been going on for six months. There's been sort of several rounds of consultation, so, I mean, [the jurisdiction], you know, need to be congratulated here.'

Some providers – particularly smaller providers – felt that while they were broadly aware of the Framework and the individual measures and it was on their ‘radar’, they were not fully prepared for when some measures had come into effect:

‘That one I only found out about literally the day it was meant to be implemented. Our IT provider just basically emailed us that we were – we’ve got to change this – change the way that this is – you know, like the way the system handles it. So that was sort of the only – the only information that I sort of was provided with regards to that.’

‘A little better communication there around implementation date might’ve been helpful. It’s just, it just required us to act pretty quickly on that. And I know other operators brought – put those changes into effect when they were flagged in the Framework, some didn’t, so we were in the count there. But it did seem to come a little bit out of the blue.’

Other smaller providers described having had little direct engagement with government departments and were uncertain as to the elements of the Framework that related to them, with one stating that they were ‘probably too out of the loop’. This was especially the case for smaller bookmakers with little or no online presence, but a telephone market.

## National consistency

National consistency was widely acknowledged by providers as being integral to the success of the Framework, but also one of the main current challenges facing its implementation. Nearly all providers mentioned having concerns around jurisdictional differences, and most providers expressed doubt that national consistency across the Framework will be achieved:

‘There was such a wide variance in the standards applied across the country in different states that it was probably courageous to think that we could harmonise them completely, but we thought we could get a minimum set of standards. But even then at times some [jurisdictions] have been just unwilling to bargain and negotiate so we’ve still got a bit of a patchwork across the country.’

‘We’ve had draft implementation arrangements provided by two jurisdictions but until we see implementation arrangements from all relevant jurisdictions, it will be extremely difficult for us to form a judgement about whether or not consistency in implementation will be achieved.’

‘There’s obviously a key challenge there, where the federal government is seeking to implement the Framework on a national basis ... But are reliant on the states to implement that for them.’

‘Whilst it’s called a nationally harmonised policy, I don’t think that’s the practical outcome.’

Even when there was broad agreement and support for individual measures, providers described how details and interpretations may differ by jurisdiction, which, in turn, will lead to inconsistencies in implementation. A number of providers felt the resulting lack of consistency will undermine the goal of best possible consumer protection and a level playing field for business:

'The concern is that minor variations in language could lead to substantive differences in outcomes and inconsistencies in implementation.'

'It's hard to see how [providers are] going to meet the 26 May time frame. And if they do it's going to be a huge impost on industry because, as we've tried to work through what we think the measures look like, there's actually a number of little intricacies that have emerged ... So we just don't know whether we're going to have consistency, inconsistency.'

'I think at a high level what [providers are] trying to do is work on the basis of the [jurisdiction] ministerial directive where possible. But there is risk involved and a fundamental issue for a private entity is obviously that they are having to expend funds and assign resources to develop solutions without actually knowing what target they're ultimately going to be required to hit in each jurisdiction.'

While some providers noted that they were currently making resourcing decisions based on the *[jurisdiction described above]* model, there were concerns that jurisdictional differences would impact on implementation timelines and procedures:

'But as soon as you take, you know, the wording in one jurisdiction and you start to put it into the wording of another jurisdiction, as soon as different words are used, it can have quite the impact.'

'Every – every additional difference is obviously – there is a higher factor of difficulty. A higher cost. And also just naturally a higher risk of – of us getting it wrong.'

## Timelines and readiness

In addition to concerns around consistency across jurisdictions, a number of providers expressed frustration with the pace at which states and territories were developing and disseminating their implementation documentation. Of particular concern for providers was meeting the 26 May 2019 deadline for the next three measures, given that, once relevant documentation is provided, there will be a lag while providers undertake the development, building, trialling, testing and approval processes required to implement each measure:

'So we're now five weeks away from these measures being – or meant to be implemented according to the ministerially agreed time frame. And yet we don't have from some of the states and territories any indication of how they're intending to actually implement these measures. So it's extremely difficult as you might imagine for industry to develop technology for solutions to some of these policy goals.'

'We're less than two months out from the start date for a number of measures that require technical work and we don't even have documents that we can look at, you know, so that I can brief into our tech teams what we need to do.'

'It is difficult to feel prepared when, for a 26 May deadline we – we don't have final confirmation of requirements.'

‘The federal government has obviously issued their policy statement, but we have to wait for the state governments to confirm the detail of their approach and then we have to do the tech – well, get the approval, do the tech build. Get them signed off by an independent tester and then and only then can we actually implement.’

However, most providers did recognise and describe reasons for potential delays, including acknowledgement of the various state elections and the accompanying interruption to activities during the current Commonwealth Government caretaker period:

‘I just think the timelines unfortunately due to a bunch of state elections and now combined with the federal election have seen the timelines that have been proposed probably – I would consider them optimistic ... So what would've been reasonable time frames have been blown out.’

‘There have been a range of circumstances and events that have, I think, made the implementation process difficult to achieve in a timely fashion ... I think everyone has got good will to make this happen, it's just an unfortunate set of circumstances means that we're flying somewhat blind I think in terms of implementation, and there are risks associated with this next suite of measures [measures 4–6].’

## Resourcing and impacts on business operations

Many wagering providers described the cost and resourcing impact of implementing the Framework measures within their business operations. For some providers, resourcing concerns were heightened by uncertainty as to how jurisdictions would be monitoring compliance with some measures, and the possible need to develop different IT systems to meet different regulatory requirements:

‘[Wagering providers] are having to expend funds and assign resources to develop solutions without actually knowing what target they're ultimately going to be required to hit in each jurisdiction. And when you're asking businesses to expend hundreds of thousands, if not millions of dollars, to develop solutions and they don't know with any certainty what they're actually meant to be implementing, it's obviously a very difficult environment for them.’

‘None of these things are as easy as I think they're going to be. They all end up being more complex internally than I would've thought, involving lots of different teams from tech and customer service and operations to make the changes.’

Other wagering providers noted that regulatory changes and resulting costs to internal business mechanisms were ‘the cost of doing business’ and that technical and IT changes could be absorbed relatively easily, particularly if existing software and systems were already generating products such as account statements:

‘We've got, yeah, many consumer protection measures or responsible gambling tools in place already, so many of the measures will just be an adjustment to that existing tool to reflect a requirement under the, you know, NCPF and whatever comes out of each state.’

'There will be work that's required to be done but it's obviously not impossible and we'd planned this kind of thing. So you know it'll get done. There'll be a – yeah probably a little bit of IT development that needs to be done ... But then on an ongoing basis, pretty minimal costs.'

'So you know, everyone's got the ability to implement stuff if they prioritise it correctly. And I think, the National Consumer Protection Framework is something that should be prioritised.'

Specific resourcing impacts for smaller providers were also described. These generally related to additional financial and labour costs, but the possibility of small businesses needing to amalgamate or close was also mentioned:

'Commercially we've been squeezed by a lot of new taxes and product fees and everything so it's not really viable to put extra staff on. You know, it's just another expense to do these things. So in terms of sending out additional statements and everything, it just needs to be done in a way that isn't unnecessarily sort of labour intensive.'

'If ... jurisdictions bring out something that's a little bit different, it's going to result in a whole bunch of extra tech work. And these are things that will cost thousands of dollars in time and resources to deploy if what I've guessed is not what other jurisdictions implement.'

'Jurisdictions need to recognise they are small businesses, sometimes sole traders, and require concise and simple information and sufficient time to implement.'

In terms of other unintended impacts on business operations, a few of the larger providers described the competitive nature of the online wagering market and the potential for customers to move offshore. While they were supportive of the Framework overall, they noted that it was imperative that customer experience and value was not negatively impacted:

'If you don't allow wagering operators to provide value, then customers are far less inclined to wager domestically, and all the international research supports this very point.'

'Anything that slows us down [customer experience when betting] is just a no go, because then they will go offshore where they can get a better experience; where those operators don't pay tax, don't have sports integrity links, don't have any consumer protection issues.'

The competitive nature of the wagering market and the importance of transparency and fairness across the Australian online wagering industry was further articulated by some:

'It's really important for me in this space, that we're all taking this responsibly and seriously, and we're not looking to outgun a competitor by, you know, interpreting the spirit of the NCPF in a way that's convenient, but rather in a way that's practical.'

## Monitoring and compliance

A number of wagering providers reported their frustration at trying to ensure compliance with the Framework measures given the lack of detail from some jurisdictions as to how measures would be regulated. In the absence of any clear directives from some states and territories, many providers indicated they were working to implement the next suite of measures as laid out in the [jurisdiction described above] document,

and will compare and adjust when other state and territory documentation become available. While noting that this was not ideal, providers were keen to continue working as constructively as possible to support and implement the Framework and meet proposed timelines:

'So what I am doing is basically guessing where I think [regulation's] going to land. So I've taken the Commonwealth position. I've tried to as closely align that to the [jurisdiction described above] position as I can. And come up with where I think, you know, the jurisdictions will land.'

'We aren't worried about one set of rules at a national level, we're worried about the various interpretations of that at a lower level, as well as not just interpretations from their regulatory bodies, but interpretations having different legislation itself.'

'If we've got any issues meeting the deadlines for some of the measures or we've got any technical challenge that we've like to talk through with a regulator. You know, typically you'd be talking through with one jurisdiction on something, perhaps that's bringing in something new, but in this instance we'd have to speak to, if not all, the vast majority of states and territories, which makes it a very complicated exercise.'

'The difficulty that you have ... is that not all states apply the same methodology in their approach to regulation. So, there's a mix of point of supply versus point of consumption.'

In discussing the potential burden of monitoring and compliance on their business activities, a number of providers discussed the potential benefits of having a national regulator overseeing the whole Framework:

'Nine different potential product implementations. Um, you know, nine compliance checks. It just obviously adds to the burden of a small operator. Ideally there'd be federally mandated laws around all of this and we'd apply it across all the states consistently.'

'There would be some measure in having a national regulator, and there's some downsides to that too. But a national regulator of wagering, considering that we're all fundamentally regulated by the Interactive Gambling Act at a federal level ... you would have one regulator that would regulate wagering.'

For other small providers there appeared to be a level of misunderstanding that a consistent national system would be achieved through the states introducing federal legislation, which would then also be federally monitored:

'My understanding is that the states will have to introduce federal legislation. So until that's all finalised and everything, you're trying to balance various different parts of legislation.'

Other issues that were raised included the difficulty of providing compliance in an online environment:

'Even things like having a pop-up that comes up on an app to remind customers [of annual deposit limit reminder] ... should there be a button for them to click that says "yes" you've registered it? What kind of compliance measures, what kind of audit trail do we need to put in



place so we can demonstrate to regulators that we have done this? For those customers that call up on the telephone, what's the most appropriate way of advising them?'

Concerns about implementing the next suite of measures satisfactorily and on time (given some of the issues raised above) were also expressed, and providers were hopeful – at least initially – that there would be some flexibility in how regulators monitored compliance with these measures:

'We're doing everything we can to ensure that we're putting these things in place, both because that's what we do in terms of compliance, because we care for our customers and we want them to have the right tools, and also because that's just good, respectful business practice to do what you said you were gonna do. But we are all running into our own complexities and challenges and interpretations, and so we would hope that regulators would be very accepting and listening and interested in some of those challenges as we work through them. And provided that we can demonstrate that we are – that they are exceptionally legitimate, that we would be given the appropriate space, I suppose, to both interpret and introduce them in a way that is frankly possible.'

'It would be nice to be able to have that flexibility in implementation in order to accommodate the sort of operational challenges ... So it'd be having that – you know, that pragmatic and collaborative discussion [with regulators] around, you know, are we comfortable that that could be an acceptable approach.'

'My biggest callout would be just a subtle degree of flexibility around our introduction time frame and – and an expectation that we're probably not all gonna get it perfect in a first go, but that we will work over time; where we find that other operators are interpreting it slightly different than us, to ensure that we're all doing right by the Framework.'

A small number of providers described a more laissez-faire approach where they were undertaking some preparatory work but would wait to see what was specifically required in their business when relevant documentation was made available by the different states and territories.

## Individual Framework measures

Most providers reported overall support for the suite of 10 Framework measures:

'I tend to think all of the measures are reasonable and proportionate. And, you know, we support them from a consumer protection perspective. And we're looking forward to this becoming the law so that all operators are operating to the same standards, so that we can, you know, essentially give protection to those consumers who are vulnerable to harm.'

'We were consulted on the actual measures themselves. And we had opportunities to make various submissions. And, look, we're broadly comfortable with the measures.'

Providers generally commented that implementation of measures 1–3 had been a relatively smooth process and they were appreciative of the Commonwealth's approach to these initial measures:

'From our perspective, those first three measures that you've listed are ones that we're very supportive of and we're very pleased to see are now standard across the industry.'

'We've had a couple of measures that have already come into effect at the Commonwealth level and that's been quite smooth ... There was consultation. A completely smooth process.'

However, with the roll-out of the next three measures due for implementation in May 2019, providers reported that (at the time of interview) details and documentation were lacking from most states and territories. They were concerned about the potential effects this may have on the implementation process and the Framework's outcomes.

Specific issues regarding some of the measures are outlined below.

### Restrictions on inducements (measure 4)

Measure 4, 'Restrictions on inducements', due to come into effect in May 2019, was a concern for many wagering providers, particularly in relation to compliance with different regulatory regimes across jurisdictions:

'Every state and territory, despite a [national] Framework of this type, is going to have nuances. Particularly around inducements, which was expressly called out in the document because ... states weren't able to land on a harmonised view. It's deeply challenging ... That's sort of the political and regulatory landscape that we have to manage ... inducements are a hard spot.'

'[The inducements] it's tricky, we have an uneven playing field at the moment. There's no indication that we're going to have a level playing field.'

'So even though there is a baseline requirement in terms of inducements, our expectation is that jurisdictions will continually impose additional requirements above and beyond and separate to the NCPF, which for wagering providers ... who are operating nationally, not on a per jurisdiction basis, obviously continues to add to the complexity associated with consumer protection.'

In addition to different compliance requirements across jurisdictions, some providers suggested there might be different interpretations of the measure itself; either it related to a restriction on advertising the inducement, or a restriction on offering the inducement/promotion itself:

'[Restrictions on inducements] doesn't actually reduce the volume or intensity of advertising, it just reduces them by type.'

'[Jurisdiction's] prohibition on inducements is a prohibition on advertising inducements ... the prohibition in the Commonwealth document is a prohibition on offering or providing inducements. And they're quite different things.'

### Consistent gambling messaging (measure 8)

A number of providers described the need for consistent gambling messaging (measure 8; due to come into effect May 2020). It was agreed that this messaging needs to be evidence-based and proven effective

for the measure to be successful. Some providers mentioned that the upcoming trial will be an important opportunity to develop messaging that can be applied consistently across jurisdictions and providers.

Several providers noted that their current messaging was quite lengthy because of the need to cover all jurisdictions with varying standards, which they thought might minimise its effectiveness:

'Most jurisdictions have different messaging requirements, and the net effect of that is small disclaimers at the bottom of advertising that try to pick up all of the required responsible gambling messaging ... and I think the combination of all those jurisdictional messages actually decreases the impact of possibly a larger "responsible gambling" message that's more succinct and targeted.'

'At the moment we have, for example, a national message that we use on national materials ... that's quite a lengthy message in order to accommodate state-based differences ... There's an interesting discussion to be had if research is telling us a shorter message is more powerful.'

Another provider suggested rotating messages that could be updated every six or 12 months to ensure consumer engagement, while also not unduly burdening operators.

'It seems to me the most responsible course of action here is for a group to decide on – with academics and researchers and councils and so on, to agree on what are the four or five messages that translate, that work, that make sense to people ... as being a powerful message as opposed to potentially just "Gamble Responsibly" which is kind of a bit nebulous and vague.'

One provider suggested that messaging for consumers could be designed for different sub-populations of people who wager online, such as younger men, while another said, 'just have one message for everybody'. Another noted that consistent gambling messaging was of less relevance to on-course bookmakers, given their small online or telephone customer base and the nature of their wagering.

## National Self-Exclusion Register (measure 10)

Wagering providers reported broad support for a national self-exclusion register (measure 10; due to come into effect in May 2020):

'We think this is a really key consumer protection measure. And some of the most tragic cases we see of people who've experienced harm from problem gambling, they've actually, you know, moved from provider to provider. So we think this measure is just the complete no-brainer for everyone to give those really vulnerable people who have ... chronic gambling addictions the protection that they need.'

'If you consider that one of the core reasons this has come about in the first place is to provide harmonised tools and protection for customers, you'd have to argue that one of the key benefits for a customer, one of the key things – issues of protection for a customer whose put their hand up and said, "Hey, I'm having some trouble with my wagering, I need to take a genuine break", is to be able to go to an external site and for three months completely exclude themselves from all operators.'

However, a number of providers expressed frustration at the likelihood of delays in implementation of the register:

'[The self-exclusion measure] is the absolute no-brainer of the consumer protection measures, that industry wants, consumers need, consumer advocates want as well. But it's – at the current rate of progress, it's basically a certainty that it won't be delivered by 26 May 2020.'

'My main frustration at the moment is that, for instance, the national self-exclusion register unfortunately is now going to go down a rabbit hole and I suspect it will be over two years, if ever, before we'll see it ever come to play. And I think it is one of the most significant reforms out of this process, but it now has to be managed through a tender process ... so I have a frustration that through no fault of anyone, other than the rules, one of the most significant reforms is still a couple of years away.'

'So the overseas experience with developing and implementing any multi-provider self-exclusion scheme, and I'm talking in every single overseas jurisdiction where they've implemented one, has been that it's taken longer, been more complex, and cost more than initially anticipated.'

Other providers noted that there were questions as to how a national self-exclusion register would operate in practice and what impact it might have on gambling behaviour:

'If somebody has a gambling problem and they exclude through a register, yes then every provider can close down that customer's account. But there are a couple of follow-on issues. Number one, if that customer still wants to gamble, they can open up another account using different credentials. And yes, we can capture that through the [verification] process but it's not entirely a flawless process. And secondly, where does the protection start with regards a customer who may be self-excluded online but then ... goes down to the local TAB or goes down to their local pub and feeds in cash to a pokie machine?'

'I don't think it's even been decided yet who will be the provider ... you know whether customers will be expected to self-exclude [through] a provider, or self-exclude within the register itself.'

'There's a lot of different views on National Self-Exclusion. Some see it as the sort of hallmark of the NCPF, and others see it as just a big pie in the sky that would never ever be done because it's all seemingly too complex.'

## Box 4.1: Summary of findings from stakeholder interviews

- Overall, regulators viewed the National Framework as a positive development in encouraging stronger consumer protection measures and promoting the regulation of online wagering in Australia.
- Regulators acknowledged there were still challenges in implementing measures consistently across jurisdictions, and in reconciling harmonisation of standards across borders.
- Providers were generally very supportive of the Framework and perceived the main benefits to be improved consumer protection and greater harmonisation across the online wagering industry in Australia.
- Providers reported developing internal systems and protocols to ensure efficient and effective implementation of the Framework, but expressed some frustration that (at the time of interview) there had been limited communication with state and territory regulators, which created some uncertainties regarding implementation requirements.
- Current concerns for providers most often related to timelines and readiness, impacts on resources and business operations, and achieving national consistency.
- Providers described that they were wanting to ensure they were compliant with the measures, but were also seeking some flexibility and understanding from regulators as the Framework is rolled out (particularly with regard to the next suite of measures).
- Going forward, providers wanted more transparency and better communication from regulators about any further impacts or changes to their operations, and adequate support to interpret and implement the Framework's measures.
- Smaller wagering providers/bookmakers may need additional support and engagement to ensure compliance with NCPF measures.

## 5. Consumer survey: key findings

### Participant characteristics

The consumer survey was conducted between 6 March and 1 April 2019. A total of 5,076 people aged 18 and over participated in the online consumer survey. Age, gender and other demographic characteristics of these respondents are provided in Tables 5.1 and 5.2.

Survey participants were mainly male (77%), with mean and median ages of 47.7 (SD = 14.5) and 47 years, respectively. Most reported being Australian-born (81%), non-Indigenous (95%), and speaking only English at home (88%). Over half were married or in a de-facto relationship (57%) and around a third reported living with a partner and at least one dependent child (35%). Just under two-thirds reported post-secondary education (60%), a similar proportion reported being in full-time employment (59%) and around 10% were currently studying.

**Table 5.1: Sociodemographic profile of the baseline survey participants (N = 5,076)**

Categories	Number	% of total
<b>Sex</b>		
Male	3,898	76.8
Female	1,170	23.0
Other	8	0.2
<b>Age group</b>		
18–34	937	18.5
35–49	1,639	32.3
50–64	1,275	25.1
65+	666	13.1
Rather not say/Don't know	559	11.0
<b>Indigenous status</b>		
Non-Indigenous	4,828	95.1
Indigenous	141	2.8
Prefer not to say	107	2.1
<b>Region of birth</b>		
Australia	4,117	81.1
Other	959	18.9
<b>Languages spoken at home</b>		
English only	4,453	87.7
English and other	578	11.4
Other only	45	0.9
<b>Highest education level</b>		

Year 10 or below	687	13.5
Completed Year 11	330	6.5
Completed Year 12	957	18.9
Certificate or diploma	1,255	24.7
Bachelors	1,143	22.5
Postgraduate	666	13.1
Other	38	0.7
<b>Employment</b>		
Employed full-time	3,017	59.4
Employed part-time	470	9.3
Casual employment	370	7.3
Unemployed – looking for work	236	4.6
Unemployed – not looking for work	428	8.4
Other	555	10.9
<b>Current student status</b>		
Not studying	4,535	89.3
Full-time student	202	4
Part-time student	292	5.8
Other	47	0.9
<b>Relationship status</b>		
Married/in a de facto relationship	2,892	57
Single	1,079	21.3
In a relationship	777	15.3
Divorced/Separated	262	5.2
Other	66	1.3
<b>Living arrangement</b>		
Alone	722	14.2
With parents	339	6.7
In share house with other adults	415	8.2
With partner (no children)	1,449	28.5
With partner (with at least one dependent child)	1,767	34.8
With at least one dependent child (single parent)	240	4.7
No specific address	30	0.6
Other	114	2.2
<b>Annual after-tax income</b>		

<20,800	461	9.1
20,800–41,599	806	15.9
41,600–62,399	1,148	22.6
62,400–77,999	538	10.6
78,000 or more	937	18.5
Prefer not to say/don't know	1186	23.4

In terms of place of residence (Table 5.2), close to two-thirds (62%) reported living in one of the state capitals; the remainder in the territories or regional areas. Around one third of the sample reported residing in NSW and another third in Victoria.

**Table 5.2: Jurisdictions and areas in Australia where participants live (N = 5,076)**

Jurisdictions and regions	Number	% of total
<b>NSW</b>	<b>1,802</b>	<b>35.4</b>
Sydney	1,040	20.5
Regional/Rural New South Wales	762	14.9
<b>Victoria</b>	<b>1,575</b>	<b>31.0</b>
Melbourne	1,149	22.6
Regional/Rural Victoria	426	8.4
<b>Queensland</b>	<b>1,030</b>	<b>20.3</b>
Brisbane	567	11.2
Regional/ Rural Queensland	463	9.1
<b>South Australia</b>	<b>75</b>	<b>1.5</b>
Adelaide	53	1.0
Regional/Rural South Australia	22	0.4
<b>Tasmania</b>	<b>107</b>	<b>2.1</b>
Hobart	48	0.9
Regional/Rural Tasmania	59	1.1
<b>Western Australia</b>	<b>338</b>	<b>6.6</b>
Perth	273	5.4
Regional/Rural Western Australia	65	1.3
<b>Northern Territory</b>	<b>37</b>	<b>0.7</b>
<b>Australian Capital Territory</b>	<b>100</b>	<b>2.0</b>
Prefer not to say	12	0.4
<b>Metro (state capitals)</b>	<b>3,130</b>	<b>61.7</b>
<b>Regional/Rural/Territories</b>	<b>1,934</b>	<b>38.1</b>



## Gambling participation

### Participation by wagering type

Three-quarters (75%) of the respondents reported having placed bets on horse racing in the past 12 months, around half (53%) placed bets on sports, and around a third (32%) on greyhound racing (Table 5.3).

**Table 5.3: Number and percentage of people who reported placing bets on different activities during the past 12 months (either online or offline)**

Type of activity	Number	% of total
Sports	2,683	52.9
Horse racing	3,806	75.0
Harness racing	1,134	22.3
Greyhound racing	1,610	31.7
Fantasy sports	189	3.7
eSports	130	2.6
TV events/shows	199	3.9
Current affairs	135	2.7
Other	729	14.4

Note: Percentages do not total 100% due to participation in multiple activities.

Table 5.4 presents the participants' age, gender and location breakdown by betting activity.

- Female participants accounted for around one quarter (24%) of those who reported having placed a bet on horse racing in the past 12 months, and one third of those who placed bets on TV events/shows. Females were much less likely to report having placed a bet on fantasy sports or current affairs during that time.
- Some age differences by activity were also observed, with participants who reported betting on the different types of 'racing' typically in the older age groups, and those who reported having bet on fantasy sports, eSports, TV shows and current affairs were often younger.

**Table 5.4: Key characteristics of participants who reported placing bets in the past 12 months**

Category	Sports (N=2683)	Horse racing (N=3806)	Harness racing (N=1134)	G'hound racing (N=1610)	Fantasy sports (N=189)	eSports (N=130)	TV events/ shows (N=199)	Current affairs (N=135)
	%	%	%	%	%	%	%	%
<b>Sex</b>								
Male	87.6	76.2	85.4	84.3	94.2	88.5	67.3	91.1
Female	12.2	23.6	14.5	15.5	5.8	10.8	32.7	8.9
Other	0.2	0.2	0.2	0.2	0.0	0.7	0.0	0.0
<b>Age group</b>								
18–34	26.1	17.5	22.0	24.1	42.3	54.6	42.2	40.7
35–49	37.0	31.7	35.4	35.5	37.0	20.0	36.7	29.6
50–64	19.5	26.6	23.8	23.8	9.5	6.2	10.6	11.9
65+	6.4	14.8	9.8	7.1	2.7	2.3	1.5	8.2
Rather not say/ Don't know	11.0	9.4	9.1	9.5	8.5	16.9	9.1	9.6
<b>Location</b>								
NSW	37.3	35.0	30.2	34.4	28.6	33.1	32.7	34.7
Victoria	29.5	32.8	31.0	30.0	42.3	32.2	40.7	34.8
Queensland	20.3	20.1	23.5	21.5	13.8	20.0	17.6	15.6

## Number and combination of activities

The proportion of survey participants who reported spending money on a given number of wagering types in the last 12 months is provided in Table 5.5. Findings suggest that over half (55%) reported having spent money on two or more wagering activities during that time, and another 17% wagered on four or more activities.

**Table 5.5: Number and proportion of survey participants who spent money on a given number of gambling products in the past 12 months (N = 5,076)**

Number of activities	Number	(%)
1	2,289	45.1
2	1,178	23.2
3	751	14.8
4+	858	16.9

A further breakdown of wagering involvement revealed that:

- Participants who reported wagering on multiple activities in the last 12 months did so on 2–4 different activities (on average) during that time, with the additional activities or wagering types most commonly sports and horse racing.
- Horse racing (highest) and harness racing (lowest) stand out in relation to sole participation. For example, almost a third (31%) of participants who wagered on horse racing did not spend money on other activities; but, on average, participants who wagered on horse racing reported having spent money on 2.4 different activities in the last 12 months (Table 5.6).

**Table 5.6: Proportion of sole participation and mean number of activities, for each wagering type**

Activity	Total participants	Only one activity (%)	Mean number of activities
Sports	2,683	18.1	2.8
Horse racing	3,806	30.7	2.4
Harness racing	1,134	0.4	3.8
Greyhound racing	1,610	1.2	3.5
Fantasy sports	189	6.9	4.2
eSports	130	7.7	4.3
TV events/shows	199	8.5	4.0
Current affairs	135	8.2	4.3
<b>Any betting</b>	<b>5,076</b>	<b>45.1</b>	<b>2.1</b>

- Among participants who reported having bet on sports during the last 12 months, three quarters reported having also bet on horse racing (77%), two-fifths on greyhound racing (44%) and just under a third on harness racing (31%) (Table 5.7).
- The majority of participants (around 80%) who reported having wagered on some of the lower prevalence activities during the last 12 months (e.g. fantasy sports and eSports) also reported having placed bets on sports and horse racing during that time.

**Table 5.7: Other gambling activity participation rate by activity**

Activity (N)	Participation rate in other activities (%)							
	Sports	Horse racing	Harness racing	G'hound racing	Fantasy sports	eSports	TV events/s hews	Current affairs
Sports (2,683)	-	77.2	30.9	43.5	6.2	4.2	5.7	4.2
Horse racing (3,806)	54.4	-	29.4	41	3.9	2.6	4	2.8
Harness racing (1,134)	73	98.5	-	85.8	7.1	4.7	6.1	4.6
Greyhound racing (1,610)	72.4	97	60.4	-	6.8	4.8	6	4
Fantasy sports (189)	87.8	79.8	42.3	58.2	-	15.9	18	13.8
eSports (130)	86.2	74.6	40.8	60	23.1	-	23.9	16.2
TV events/shows (199)	77.4	75.9	34.7	48.2	17.1	15.6	-	25.1
Current affairs (135)	83.7	77.8	38.5	48.2	19.3	15.6	37	-

Note: Proportions to be read across rows, e.g., among sports bettors, 77.2% reported also betting on horse racing, 30.9% on harness racing, 43.5% on greyhound racing etc.

## Frequency of participation by wagering type

Participants were also asked about their frequency of betting on each activity during the previous 12 months. The distribution of wagering participation is presented below, along with the median frequency for each activity (Table 5.8).

- For sports and fantasy sports, the median frequency of betting was once a week (which is in line with the seasonal and weekly nature of a lot of sports).
- For horse, harness and greyhound racing the median frequency reported was 2–3 times a month, and for activities such as TV events and Current Affairs it was once or twice a year.

**Table 5.8: Frequency of participation for each activity during the past 12 months**

Activity (N)	Median frequency	4+ times a week	2-3 times a week	Once a week	2-3 times a month	Once a month	Few times a year	Once/twice a year	Not sure
		%	%	%	%	%	%	%	%
Sports (2,683)	Once a week	23.4	17.0	15.0	13.4	7.0	18.0	5.4	0.9
Horse racing (3,806)	2–3 times a month	19.4	15.7	12.6	11.2	5.7	20.4	14.3	0.7
Harness racing (1,134)	2–3 times a month	11.1	13.8	16.0	12.5	13.0	21.9	8.5	3.2
Greyhound racing (1,610)	2–3 times a month	14.1	13.9	15.2	14.8	10.1	21.2	8.3	2.5
Fantasy sports (189)	Once a week	32.8	12.7	14.3	7.4	6.9	10.1	8.5	7.4
eSports (130)	Once a month	11.5	10.0	12.3	8.5	11.5	23.1	17.7	5.4
TV event/shows (199)	Once/twice a year	3.0	4.0	7.0	3.0	5.5	23.6	51.3	2.5
Current affairs (135)	Once/twice a year	3.0	2.2	3.7	1.5	3.7	20.0	59.3	6.7
<b>Any betting (5,076)</b>	-	21.4	19.9	19.4	17.5	12	29.2	19.2	2.3

Note: Except for the last row, frequency cell values represent proportions for a particular activity, totalling 100% for each row.

## Wagering methods

In general, 80–90% of the participants within each activity reported placing bets online using portable devices during the past 12 months (Table 5.9). Online via computers was reported as the second most common method, followed by self-service terminal and in person. Only a minority of participants reported using an internet enabled telephone to place bets during the past 12 months.

**Table 5.7: Methods used for each betting activity during the past 12 months**

Activity (N)	Online using portable devices	Online using computer	Online using internet enabled TV	Online using internet enabled telephone	Telephone call	Self-service terminal	In person	Other
	%	%	%	%	%	%	%	%
Sports (2,683)	90.0	46.0	4.1	2.4	8.5	27.2	24.4	0.1
Horse racing (3,806)	82.7	43.9	3.0	1.5	3.5	27.0	27.9	0.1
Harness racing (1,134)	82.7	40.3	4.3	2.6	2.8	25.3	20.8	0.2
Greyhound racing (1,610)	84.2	36.9	4.3	2.3	2.6	30.1	21.6	0.1
Fantasy sports (189)	81.5	55.6	4.8	3.2	2.1	7.4	4.2	0.0
eSports (130)	80.8	49.2	6.2	6.9	3.1	10.0	3.8	0.0
TV shows (199)	84.9	29.1	5.0	2.0	3.5	3.5	4.5	0.0
Current affairs (135)	76.3	37.8	1.5	0.0	1.5	4.4	2.2	0.0
<b>Any betting (5076)</b>	<b>83.0</b>	<b>40.4</b>	<b>3.9</b>	<b>2.1</b>	<b>5.8</b>	<b>24.9</b>	<b>24.4</b>	<b>0.1</b>

Notes: For each activity, cell values represent proportions for that particular activity. Values for a row do not total 100% due to multiple responses to this question.

## Wagering locations

Irrespective of the activity in which they reported having engaged, survey respondents most commonly reported having placed bets primarily from their own home (or a friend/family members' home) or a licenced venue (Table 5.10).

**Table 5.8: Location of participation for each activity during the past 12 months**

Activity (N)	Home	Home of friend/family	Work	School/TAFE/Uni	Licensed venue	Casino	Sporting event or racetrack	TAB/UBET agency/shop	While commuting	Other
	%	%	%	%	%	%	%	%	%	%
Sports (2,683)	95.2	27.6	33.9	2.6	34.1	9.9	24.6	16.3	15.7	0.5
Horse racing (3,806)	91.1	24.3	25.1	1.5	31.9	5.6	24.6	16.8	8.0	0.7
Harness racing (1,134)	89.9	23.5	19.2	1.5	29.1	6.0	15.3	20.0	6.3	0.3
Greyhound racing (1,610)	90.8	25.7	21.1	2.2	33.0	6.5	14.5	21.0	6.8	0.4
Fantasy sports (189)	88.4	24.9	31.7	3.2	10.1	4.2	4.8	5.3	13.8	0.5
eSports (130)	88.5	18.5	24.6	7.7	13.1	7.7	7.7	7.7	6.2	0.0
TV shows (199)	89.4	17.1	14.1	1.0	2.5	2.5	2.0	3.5	2.5	0.0
Current affairs (135)	87.4	8.9	12.6	0.7	4.4	2.2	1.5	4.4	3.0	0.0
Any betting (5,076)	82.9	23.2	25.4	2.1	30.4	7.1	23.2	17.1	10.4	0.7

Notes: For each activity, cell values represent proportions for that particular activity. Cell values for a row, however, do not total 100% due to multiple responses to this question

## Expenditure on wagering

The respondents gave their typical daily expenditure for each activity that they reported having placed bets on in the past 12 months. When frequency distribution was looked at for each activity, outliers were spotted for daily expenditure and the 99th percentile was set as the cut-off (to remove extreme values). The mean, median and mode values for daily expenditure on different activities were determined for valid values (Table 5.11).

Findings suggest that the average spend on each activity on a typical day of betting in the past 12 months ranges from around \$50–\$100. For horse racing the most common typical spend was \$50 (mode), and for sports it was \$20.

**Table 5.9: Daily expenditure (\$AUD) on betting activities in the past 12 months**

Activity (Valid N)	Average expenditure (Range)	Median, Mode
Current affairs (135)	\$140.1 (1–3000)	32, 50
Horse racing (3,779)	\$96.2 (1–2,000)	40, 50
Sports (2,662)	\$84.1 (1–2,000)	25, 20
TV events/shows (198)	\$71.5 (1–1000)	20, 5
eSports (130)	\$67.8 (1–1000)	20, 10
Harness racing (1,127)	\$46.9 (1–1000)	20, 10
Greyhound racing (1,600)	\$51.9 (1–1000)	20, 10
Fantasy sports (188)	\$37.7 (1–1000)	15, 10

Note: Average calculated for respondents taking part in individual activities and reporting valid expenditures.

## Online wagering participation

To improve understanding of how participants might be affected by the National Framework for online wagering they were asked a range of questions related to their wagering specifically via online or interactive modes (including via telephone call).

### Proportion of bets placed online

On average, the survey respondents reported placing around 87% of their bets online during the last 12 months, with 2% placed via telephone call (Table 5.12).

It is important to note that although in Table 5.12 'online' refers to only using the Internet (on multiple devices, such as smartphones, computers and tablets), all subsequent references to 'online' in this report include telephone calls as well (as per the scope of the National Framework). There were 57 participants who reported not having used the internet during the last 12 months, but all of them reported having used telephone calls to place bets. Therefore, all of the 5,076 participants are included in the online betting cohort for this study.



**Table 5.10: Average proportion of bets placed using different methods in the past 12 months (N = 5,076)**

Method	N of participants*	Average % of bets placed <sup>#</sup>
Online (using internet)	5,019	87.0
Telephone call	504	2.0
Self-service terminal	1,498	5.5
In person	1,498	5.5

Notes: \*Total respondents who used this method to place any bets in the past 12 months. <sup>#</sup>Average calculated on total sample (N = 5076).

## Changes in online wagering participation

Around one in six participants (18%) reported spending more on online wagering now compared to 12 months ago, half (55%) reported that their spending remained about the same, and around a quarter (28%) reported that their spending had decreased (Table 5.13).

**Table 5.11: Comparison of current expenditure on online betting with that 12 months ago (N = 5,076)**

Expenditure status	Number	Percentage
Much more	350	6.9
A little more	555	10.9
About the same	2,766	54.5
A little less	751	14.8
Much less	654	12.9
<b>Total</b>	<b>5,076</b>	<b>100.0</b>

## Online wagering planning

On average, 65% of the participants' online betting in the past 12 months was reported to have been planned in advance of the event, with around one third reportedly made on impulse; either before the start of the event or on impulse during the event (Table 5.14).

**Table 5.12: Degree of impulse and associated average proportion of the bets placed online in the past 12 months (N = 5,076)**

Degree of impulse	Average proportion (%)
Planned in advance of the event	64.9
On impulse before the start of the event	28.5
On impulse during the event	6.6

Note: Percentages may not total 100% due to rounding.

## Online betting accounts

On average, the participants reported having 2.5 online betting accounts with values ranging from 0 to 85; the 99th percentile was used as a cut-off, with a valid  $n = 5,026$ . The mean and median number of online accounts were 2.3 and 2, respectively. Close to half (46%) reported having only one account, while almost one-fifth had more than three accounts.

A total of 62 people reported currently having no online accounts, but 57 of those participants reported having placed bets online using the internet in the past 12 months (see Table 5.12). Among those who reported not having a current online account:

- 15 reported having closed an account, 6 months ago on average
- 10 reported having inactive accounts
- 13 reported never having an online account (bet via only telephone call)
- 24 reported never having an online account in their own names (only used someone else's account).

All participants with a current or previous online wagering account were asked how old they were when they first signed up for an account. A total of 4,079 (80.4% of total) respondents entered an age, which ranged from 1 to 85 with 24 participants having entered values less than fourteen years. Table 5.15 shows a summary of the age reported.

**Table 5.13: Age when first signed up for an online betting account (N = 4,079)**

Age group	%
<18	1.2
18–34	46.4
35–49	29.4
50–64	19.2
65+	3.9

Note: Percentages may not total 100% due to rounding.

Participants were also asked whether they had ever closed an account, with 1,432 respondents (28.6% of those with at least one current account) reporting having done so in the past. It is important to note that this may include accounts with providers licensed in Australia or offshore.

Open text responses (provided by  $n = 1,383$ ) suggested that the main reasons for closing an account related to perceived poor customer service from the wagering provider/s, dissatisfaction with the features available from the provider/s, and a lack of appealing odds or inducements.

'Not happy about software and interface.'

'I didn't like the T&Cs of the betting agent.'

'Not attractive bonuses and lack of betting guide.'

'Restrictions, poor odds and poor customer service.'

'Dispute with provider and slow payment or reduction in service. If a provider disappoints me, I permanently self-exclude from provider.'

'Lousy payout times, cheating on failing to pay winning bets, non-Australian owned agencies, poor service.'

Others noted that they did not need multiple accounts, so has chosen a preferred wagering provider.

'Didn't need multiple accounts offering similar odds, incentives, etc.'

'Because I favoured one over the other and did not want two accounts.'

Some also noted that the wagering provider/s has closed their account/s because they were successful or winning.

'Successful wagering. Closed by the betting company.'

'Betting restrictions were put on me because I was winning. Also banned me from promo bets.'

'Because the sports betting company had restricted my betting limits on the account so they don't deserve my service for being crooks.'

'Terrible service, was dodgy and they banned me for winning.'

Finally, a small number of open text responses mentioned having closed accounts as a form of protection against problem gambling.

'To get rid of this bad betting habit.'

'Very addictive. The more convenient betting is, the more it destroys families.'

## Offshore wagering accounts

A total of 5,039 people responded to the question of whether they had ever used or opened a betting account with any offshore wagering companies (Table 5.16). Almost 13% reported having done so at some point.

**Table 5.14: Ever specifically chose to use/open a betting account with any offshore wagering companies (N = 5,039)**

Response	%
Yes	12.7
No	84.6
Prefer not to say	2.7

## Lines of credit and payday lending

In the past 12 months, 12.5% of all participants reported having been offered lines of credit, and 3.6% had been offered credit contracts or referrals to a payday/short-term lender by a betting company in order to place online bets. Prohibition of offering these benefits are the two measures that were rolled out in February 2018. The following table (Table 5.17) presents the gender and age breakdowns for survey participants who were offered such benefits.

**Table 5.15: Gender and age breakdowns of those offered credit benefits in the past 12 months**

Category	Lines of credit (N = 635)	Credit contracts or referrals (N = 183)
	%	%
<b>Sex</b>		
Male	75.6	73.2
Female	24.1	26.2
Other	0.2	0.6
<b>Age group</b>		
18–34	20.6	16.4
35–49	29.1	32.8
50–64	22.2	26.8
65+	16.9	10.9
Rather not say/Don't know	11.2	13.1

Note: Percentages may not total 100% due to rounding.

## Other gambling participation

Survey respondents were also asked if they had participated in other gambling during the last 12 months, including poker machines (pokies), casino table games and poker and, if so, the mode of participation in these activities. Just under half (44%) reported having participated in one or more of these activities in the past 12 months, with 38% reporting participation in pokies, 18% in casino table games, and 9% on poker. A summary is presented below (Table 5.18).

**Table 5.16: Participation in other activities during the past 12 months (N = 5,076)**

Activity	Number	%
<b>Poker machines (pokies)</b>	<b>1,918</b>	<b>37.8</b>
Online	198	3.9
Licensed venue	1,720	33.9
<b>Casino table games (e.g. blackjack, roulette, but NOT poker)</b>	<b>939</b>	<b>18.5</b>
Online	237	4.7
Licensed venue	702	13.8
<b>Poker</b>	<b>159</b>	<b>9.4</b>
Online	101	2.0
Licensed venue	194	3.8
Informal (e.g. with friends)	182	3.6
<b>None of the above</b>	<b>2,843</b>	<b>56.0</b>

Note: Percentages exceed 100% due to participation in multiple activities.

## Wagering motivations and control measures

### Motivations for online betting

Almost two-thirds of the respondents (64%) identified enjoyment as one of their main motivations to wager online during the last 12 months. About a third (31%) reported that betting on an event made watching it more interesting, and 27% reported that betting was a social activity for them (Table 5.19).

**Table 5.17: Motivation behind betting online in the last 12 months (N = 5,076)**

Motivation	%
I enjoy a punt	64.3
Having a bet makes watching sports/races more interesting	31.3
Betting is a social activity for me	27.4
I enjoy betting with friends	18.7
I have a lot of experience/knowledge of sports and/or races	18.6
To get ahead financially	17.1
Betting promotions	14.7
To feel part of the atmosphere of a big sporting/race event	13.6
The adrenaline rush	12.5
Easy (24-hour) access to betting	11.9
Boredom	10.7
I bet when I drink alcohol	6.0
My friends bet so I bet too	4.5
To chase losses/win back money lost	3.7
I enjoy competing with other bettors	3.5
Betting advertisements	2.9
Loneliness	2.8
I bet when I use other drugs	0.5
Other	5.0

Note: Percentages exceed 100% due to multiple responses to this question.

To facilitate a better understanding of these motivations, we categorised them under some broad groups and examined prevalence under these sub-headings (Table 5.20). This grouping, however, was not done based on any statistical analyses of the items. Percentages next to each category refer to proportions of participants reporting any of the motivation items included under that category.

Similar to Table 5.19, the largest proportion of respondents (75%) linked the enjoyment and excitement derived from the betting event to their motivation for betting online in the last 12 months. Around two in five participants (40%) identified the social aspects of betting as being one of their main motivations.

**Table 5.18: Motivation categories for betting online in the last 12 months (N = 5,076)**

Category and Items	% of participants
<b>Positive experience with betting or the event</b>	<b>75.3</b>
The adrenaline rush	
I enjoy competing with other bettors	
I enjoy a punt	
I have a lot of experience/knowledge of sports and/or races	
Have a bet makes watching sports/races more interesting	
<b>Social</b>	<b>42.2</b>
Betting is a social activity for me	
I enjoy betting with friends	
To feel part of the atmosphere of a big sporting/race event	
My friends bet so I bet too	
<b>Marketing strategies</b>	<b>22.6</b>
Betting promotions	
Easy (24-hour) access to betting	
Betting advertisements	
<b>Financial</b>	<b>18.5</b>
To get ahead financially	
To chase losses/win back money lost	
<b>Negative feelings</b>	<b>11.4</b>
Boredom	
Loneliness	
<b>Alcohol and other drugs</b>	<b>6.23</b>
I bet when I use drugs	
I bet when I drink alcohol	

Note: Percentages exceed 100% due to multiple responses to this question.

## Self-control measures

Participants were also asked if they had employed any strategies to try to limit or control the amount of time or money they spent betting online during the last 12 months. While around a third each reported that they had 'monitored how much money they spent betting' (39%) and had 'set limits for how much they can spend each week' (34%), smaller proportions reported having engaged in any of the other listed strategies. Another one third (34.9%) reported that they had not employed any strategies to limit or control their involvement in betting (Table 5.21).

**Table 5.19: Self-control measures to control involvement (money or time) in online betting during the last 12 months (N = 5,076)**

Measures	% of N (5,076)
Monitor how much money I spend betting on sports/races	38.8
Set limits for how much I can spend each week	33.6
Set limits for which days of the week I bet	9.9
Substitute betting with other activities	4.6
Avoid drinking alcohol while betting	4.2
Cancel or suspend apps/subscriptions to betting agencies	3.4
Other	3.0
Talk to friends or family about my betting	2.1
Avoid watching sports/races with ads for betting agencies	1.6
Use joint bank accounts to manage how much I spend (e.g. with partner, friends)	1.4
Avoid spending time with family/friends who regularly bet	1.3
Remove access to mobile/internet data for betting	1.1
Talk to health professionals about my betting	0.5
Access help/information from gambling/betting help websites or online forums	0.5
<b>I do not do anything to limit my betting</b>	<b>34.9</b>

Note: Percentages exceed 100% due to multiple responses to this question.

## Gambling-related harm

Gambling-related harm was assessed via the Problem Gambling Severity Index (PGSI) and the Gambling Harms Scale.

According to the PGSI scores (Ferris & Wynne, 2001), around half of all participants (51.8%;  $n = 2,629$ ) would be classified as being at risk of or already experiencing any level of gambling-related harm. The high-risk category (or 'problem gambling') comprised 8% of participants (Table 5.22).



**Table 5.20: Prevalence of at-risk gambling among survey participants (N = 5,076)**

Risk group	Number	% of total
Non-problem gambling	2,447	48.2
Low risk gambling	1,254	24.7
Moderate risk gambling	944	18.6
Problem gambling	431	8.5
<b>Any risk</b>	<b>2,629</b>	<b>51.8</b>

Notes: 'Any risk' category includes low-risk, moderate-risk and problem gamblers. Percentages may not total 100% due to round.

Analysis by sex and age group highlighted further areas for exploration. For example, according to PGSI scores, over half (55%) of all male participants would be classified as being at risk of some harm (low, moderate or problem gambling), compared to around two in five (40%) female participants in the study (Table 5.23).

**Table 5.23: Prevalence of at-risk gambling, among each sex (N = 5,068)**

Risk group	Male	Female
Non-problem gambling	<i>n</i> = 1,741 (44.7%)	<i>n</i> = 706 (60.3)
Low risk gambling	<i>n</i> = 1,006 (25.8%)	<i>n</i> = 245 (20.9)
Moderate risk gambling	<i>n</i> = 790 (20.3%)	<i>n</i> = 150 (12.8%)
Problem gambling	<i>n</i> = 361 (9.3%)	<i>n</i> = 69 (5.9%)

Notes: 'Any risk' category includes low-risk, moderate-risk and problem gamblers. Columns add to 100% (excluding 'Any risk' row)

Analysis by age group (Table 5.24) revealed that two-thirds (64%) of participants aged 18–34 years would be classified as being at-risk of gambling-related harm. The proportions of participants in the older age groups at any risk of harm decreased with increasing age, but within each age group, around two-fifths to half still met these criteria; highlighting the high prevalence of harm across different age groups in this sample.

**Table 5.24: Prevalence of at-risk gambling, among each age group (N = 4,518)**

Risk group	18–34 years	35–49 years	50–64 years	65+
Non-problem gambling	<i>n</i> = 334 (35.6%)	<i>n</i> = 753 (45.9%)	<i>n</i> = 682 (53.5%)	<i>n</i> = 395 (59.2%)
Low risk gambling	<i>n</i> = 257 (27.4%)	<i>n</i> = 401 (24.5%)	<i>n</i> = 314 (24.6%)	<i>n</i> = 160 (24.0%)
Moderate risk gambling	<i>n</i> = 228 (24.3%)	<i>n</i> = 321 (19.6%)	<i>n</i> = 205 (16.1%)	<i>n</i> = 92 (13.8%)
Problem gambling	<i>n</i> = 118 (12.6%)	<i>n</i> = 164 (10.0%)	<i>n</i> = 74 (5.8%)	<i>n</i> = 20 (3.0%)
<b>Any risk</b>	<i>n</i> = 603 (64.4%)	<i>n</i> = 886 (54.1%)	<i>n</i> = 593 (46.5%)	<i>n</i> = 272 (40.8%)

Notes: 'Any risk' category includes low-risk, moderate-risk and problem gamblers. Age reported as 'Rather not say/Don't know' excluded. Columns add to 100% (excluding 'Any risk' row).

Among those who were classified as experiencing any risk of gambling problems (*n* = 2,629), 77% reported having wagered on horse racing in the last 12 months and 62% on sports. A similar trend was observed for those who were classified as experiencing 'problem gambling' (Table 5.25).

Few participants who were classified as being at risk of harm reported having wagered on eSports (4%) or current affairs (3%) during that time (Table 5.25).

**Table 5.25: Proportions of respondents in each risk category, by activity**

Risk group ( <i>N</i> )	Sports	Horse racing	Harness racing	G'hound racing	Fantasy sports	eSports	TV shows	Current affairs
Non-problem (2,447)	42.8	73.0	15.0	22.1	2.2	1.5	2.4	1.8
Low risk (1,254)	57.4	75.3	22.6	32.9	3.7	2.5	4.1	3.0
Moderate risk (944)	65.0	80.1	33.6	46.2	5.6	3.6	6.5	3.7
Problem gambler (431)	70.1	74.0	38.3	51.3	7.9	6.5	6.3	4.2
<b>Any risk (2,629)</b>	62.2	76.8	29.1	40.7	5.1	3.5	5.3	3.4

Notes: 'Any risk' category includes low-risk, moderate-risk and problem gamblers. For each risk category, cell values represent proportions for that particular risk group. Values across a row do not total 100% due to participation in multiple activities.

Table 5.26 presents findings on typical daily expenditure (mean and median) for each activity that participants reported having placed bets on in the last 12 months. Across all activities, median typical expenditure generally increases with increased risk group. For example, typical median daily expenditure on sports was \$20 (mean \$57) among non-problem gamblers who bet on sports, compared to \$30 (mean \$87) among low risk, \$50 (mean \$101) among moderate risk and \$50 (mean \$137) among those classified as experiencing gambling problems.

**Table 5.26: Amounts spent by respondents in each risk category, by activity**

Risk group	Sports ( <i>N</i> = 2,662) (mean) (median)	Horse racing ( <i>N</i> = 3,779)	Harness racing ( <i>N</i> = 1,127)	G'hound racing ( <i>N</i> = 1,600)	Fantasy sports ( <i>N</i> = 188)	eSports ( <i>N</i> = 130)	TV shows ( <i>N</i> = 198)	Current affairs ( <i>N</i> = 135)
Non-problem	\$57.1 \$20	\$68.0 \$30	\$34.4 \$10	\$34.6 \$15	\$22.5 \$10	\$77.4 \$15	\$62.2 \$15	\$75.8 \$20
Low risk	\$87.3 \$30	\$109.0 \$50	\$49.1 \$20	\$50.4 \$20	\$40.8 \$10	\$70.3 \$20	\$83.5 \$20	\$238.8 \$50
Moderate risk	\$101.2 \$50	\$123.1 \$50	\$47.5 \$20	\$60.2 \$20	\$29.7 \$15	\$49.3 \$25	\$76.2 \$20	\$156.1 \$50
Problem gambler	\$136.7 \$50	\$154.5 \$64.5	\$70.2 \$35	\$81.4 \$50	\$70.8 \$30	\$74.9 \$20	\$58.1 \$30	\$66.6 \$50

Notes: For each risk category, cell values represent typical daily expenditure (money placed) for that particular risk group (only valid expenditure responses were included in the analysis). Expenditure includes money placed via any mode. Expenditure for activities with small *n*'s should be interpreted with caution.

Among the Gambling Harm Scale (Browne, Goodwin & Rockloff, 2017) items that were included, reduction of available spending money (24%) and reduction of savings (22%) were the most commonly reported harms, followed by regrets that made them feel sorry about their gambling (18%) and having less spending for recreational purposes (15%) (Table 5.27).

**Table 5.27: Prevalence of gambling harm experienced as a result of betting online in the last 12 months (N = 5,076)**

Item	Count	%
Reduction of my available spending money	1,195	23.5
Reduction of my savings	1091	21.5
Had regrets that made me feel sorry about my gambling	913	18.0
Less spending on recreational expenses such as eating out, going to movies or other entertainment	763	15.0
Felt ashamed of my gambling	594	11.7
Felt like a failure	576	11.3
Felt distressed about my gambling	531	10.5
Spent less time with people I care about	473	9.3
Increased credit card debt	393	7.7
Experienced greater conflict in my relationships (e.g. arguing, fighting, ultimatums)	378	7.4
Loss of sleep due to stress or worry about gambling or gambling-related problems	372	7.3
Neglected my relationship responsibilities	350	6.9
Less spending on essential expenses such as medications, health care and food	335	6.6
Late payment on bills (e.g. utilities, rates)	326	6.4
Reduced performance at work or study due to tiredness or distraction	326	6.4
Increased my consumption of alcohol	321	6.3
Sold personal items	189	3.7

## Personal wellbeing

A total of eight questions covering various aspects of satisfaction with life were also asked (the Personal Wellbeing Index; PWI), each on a scale of 0 (no satisfaction at all) to 10 (completely satisfied). The frequency distribution for responses to the overarching question, 'How satisfied are you with your life as a whole', is shown below (Table 5.28):

**Table 5.28: Responses to the question, ‘How satisfied are you with your life as a whole’ (N = 5,076)**

Score	% of total
0	1.1
1–4	7.3
5–8	60.3
9	14.2
10	17.8

Overall, the PWI score ranged from 0 to 85.7 with mean and median of 64.3 and 67.1, respectively. The average Australian national PWI score is 75.5 with the normative range of 74.2–76.7 [Mean-2SD – Mean+2SD, for all the past survey means] (Capic et al., 2018). The 95% confidence interval for mean (63.9–64.8) for the current sample does not overlap with this normative range. It, therefore, can be inferred that the sample in this study seemed to have scored significantly lower on personal wellbeing, when compared to the Australian population.

## Consumer protection measures

Participants were asked a number of questions related to their awareness and use of different consumer protection measures/features, and for those who had used any of the features, how useful they perceived them to be.

### Awareness and use of consumer protection measures

Around three-quarters (77%) of online survey participants reported that they had seen one or more consumer protection measures/features on betting apps/websites, and 59% reported having used a feature/s (Table 5.29). The features that were reported to have been seen (46%) or used (13%) by the highest proportion of respondents were those to set deposit limits in accounts, followed by those to set limits on betting expenditure (seen 44%; used 10%).

In terms of the proportion of respondents who reported having used a feature among those who had seen it, access to regular financial statements (38%) was the most cited. Around a quarter of participants who had seen other measures reported having also used them. Fewer participants reported having used features to exclude themselves from a website/app either permanently or for a period of time.

Of the 3,931 respondents who reported having seen at least one of the features, half (47%) reported having used one or more features.

**Table 5.29: Proportion of participants having seen consumer protection features on betting apps and websites and/or used those features**

Features	Seen (%) (N = 5,076)	Used (%) (N = 5,076)	Used from who had seen this feature (%)	Used (%) from who had seen any features (N = 3,931)
Set limits on how much I want to deposit in my account	45.8	13.2	28.8	17.0
Set limits on how much I want to bet/spend	43.5	10.1	23.3	13.1
Unsubscribe from direct marketing (e.g. emails, text messages)	40.2	11.0	27.2	14.1
Clear and consistent responsible gambling messages	39.8	8.4	21.1	11.8
Clear information about the terms and conditions for offers of any credit, voucher, reward or other benefit	32.4	9.2	28.3	6.5
Access to regular financial statements	25.0	9.4	37.8	5.6
Exclude myself from the app/website for a period of time (i.e. time out/take a break)	23.3	3.3	14.1	4.2
Information about customer verification periods and waiting times	22.6	5.0	22.3	2.8
Close my account	21.4	4.3	20.3	12.2
Information about the responsible service of gambling training that wagering companies provide to their staff	20.1	3.6	18.0	10.9
Permanently exclude myself from the app/website	15.5	2.2	14.0	4.7
<b>Any of the above</b>	<b>77.4</b>	<b>58.8</b>	<b>-</b>	<b>46.8</b>

Notes: All percentages are based on the total sample. Percentages across a column do not total 100% due to multiple features seen or used.

## Usefulness of consumer protection measures

Those who reported having seen each of the features were asked to rate its usefulness on a five-point scale (Table 5.30). At least half of all respondents who reported having used a feature found it either somewhat or very useful. The average usefulness score for features ranged between 3.5 and 4.03.

The measures that were perceived to be most useful (among those who had used them) were access to regular financial statements, clear information about terms and conditions, deposit limits, and spend limits.

**Table 5.30: Proportion of participants who used a feature, and whether found that feature useful or not in the last 12 months**

Features	No. of users	Not at all (%)	Not very (%)	Neither (%)	Somewhat (%)	Very useful (%)	Avg score*
Set limits on how much I want to deposit in my account	670	4.0	4.5	20.7	28.5	42.2	<b>4</b>
Unsubscribe from direct marketing	556	5.8	5.8	27.2	29.0	32.4	<b>3.76</b>
Set limits on how much I want to bet/spend	514	4.9	5.8	23.9	26.7	38.7	<b>3.88</b>
Access to regular financial statements	479	3.5	2.7	21.3	31.9	40.5	<b>4.03</b>
Clear information about the terms and conditions for offers of any credit, voucher, reward or other benefit	465	2.2	3.9	20.9	36.1	37.0	<b>4.02</b>
Clear and consistent responsible gambling messages	427	7.5	7.7	36.3	23.0	25.5	<b>3.51</b>
Information about customer verification periods and waiting times	256	9.4	6.3	29.3	25.8	29.3	<b>3.59</b>
Close my account	220	8.6	1.8	25.5	27.3	36.8	<b>3.82</b>
Information about the responsible service of gambling training that wagering companies provide to their staff	184	9.8	3.3	38.0	25.0	23.9	<b>3.5</b>
Exclude myself from the app/website for a period of time	167	10.2	6.0	25.1	24.0	34.7	<b>3.67</b>
Permanently exclude myself from the app/website	110	8.2	5.5	33.6	18.2	34.5	<b>3.65</b>

Notes: Rows ordered highest to lowest based on number of users. For each feature, cell values represent proportions of users of that particular feature. Values for a row may not total 100% due to rounding. \*Average of responses ranging from 1 (not at all useful) to 5 (very useful).

Eleven open text response questions were also included to capture participants’ opinions regarding the use of these customer protection measures. The average response rate for the open text questions was 5.2%, or about 264 from the 5,076 participants.

The responses were categorised into broad themes within the usefulness scale provided in the questions – very useful, somewhat useful, neither useful nor not useful, not very useful, and not at all useful. Indiscernible and out of context responses were not included in the analysis.

Key findings from the open text questions are included below.

**1. What are the main reasons you found setting deposit limits useful/not useful?**

72% found the measure useful to some extent	19% did not find the measure useful or not useful	8% did not find the measure useful
---	---	------------------------------------

There were 537 responses – the highest response rate for any question – with around three-quarters reporting that they found setting deposit limits useful. The most common reason given was the ability to control their spending on wagers.

‘Stops me putting bets on when I’ve had a bad day on the punt.’

‘Just restricts the temptation to spend and gamble more.’

There were a small number of respondents, however, who reported that they did not perceive the feature to be useful. The two main reasons given were that setting deposit limits only applied to people with gambling problems, and that it was easy to bypass the feature entirely by creating a new account.

‘It does not limit you from having multiple betting accounts and being able to use these simultaneously.’

‘You can get around them or open another account, triggered by constant regular advertising for gambling.’

**2. What are the main reasons you found setting bet/spend limits useful/not useful?**

67% found the measure useful to some extent	22% did not find the measure useful or not useful	11% did not find the measure useful
---	---	-------------------------------------

From the 399 responses, over half of the respondents to this open text question reported having found the measure to be useful to some extent. As with the previous question, the most common theme was controlled spending.

‘Keeps losses to acceptable amounts, prevents accidentally spending too much on individual wagers.’

‘To limit my spending and make the available money last longer, e.g. small bets.’

Around one in 10 respondents reported that they did not find this measure useful; similar to the previous question, bet/spend limits were seen to apply more to people with gambling problems, and these respondents did not perceive their gambling to be problematic. Furthermore, the ease of circumnavigating the measure was highlighted several times.

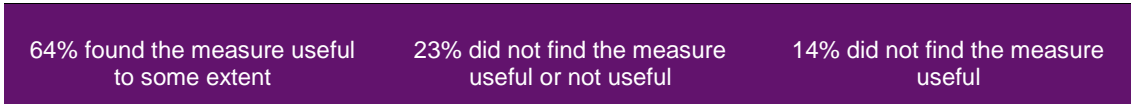


‘Too many betting options, so many sites, so many identities, so many credit cards, so many ways around.’

‘I have 5 accounts to choose from and I am able to transfer money very quickly from my bank accounts.’

‘Who cares, once you step in, no time to look back.’

**3. What are the main reasons you found features to unsubscribe from direct marketing useful/not useful?**



Two-thirds of the 396 responses to this open-ended question found the ability to unsubscribe from direct marketing useful; a substantial portion of them reported that they unsubscribed due to finding the emails and text messages annoying. Only 10% stated that unsubscribing from marketing helped to reduce their gambling activity.

‘Unsubscribed because they were annoying, not because I wanted to stop betting.’

‘Most of the time, the unsubscribe worked instantly and reduced my impulse betting.’

‘It helped me step away from gambling while I had less money, as I heard less about the promotions. Removing the email contact means less temptation to gamble unnecessarily.’

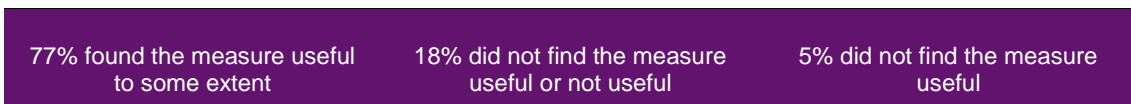
From the group who reported that they did not find the feature useful, approximately half reported that it was too easy to subscribe again, the feature did not take into consideration multiple account holders, and some of the larger operators would just redirect them to other operators if they unsubscribed from direct promotions.

There was also a small portion who reported that unsubscribing from direct marketing reduced their gambling and, potentially, winning opportunities – something they were unwilling to do.

‘When you unsubscribe from one company, another company contacts you with a “deal”.’

‘It is easier for me to be aware of opportunities if I receive correspondence.’

**4. What are the main reasons you found information about the terms and conditions (T&C) of bonus bets, vouchers, credit, and promotion useful/not useful?**



The majority of the 303 participants who provided free text comments reported that they found information about T&C useful, mostly because the information contained within the T&C that pertained to bonus bets rules and requirements directly helped them with placing better informed bets and making the most of their bonus bets.

‘So I knew what I was getting myself into and knowing all there is to know to cover myself.’

‘Ability to use these terms to manage better gambling outcomes.’

‘Allowed me to know what the payout structure would be when betting on specific overseas lotteries.’

‘Gives you an idea how much money would be ok to spend to get the potential benefits.’

**5. What are the main reasons you found the feature for customer verification useful/not useful?**

57% found the measure useful to some extent

23% did not find the measure useful or not useful

20% did not find the measure useful

One hundred and sixty-one participants provided a written response regarding how useful they perceived customer verification to be. Although most reported finding the feature useful – mainly due to the security it provided – around half reported being indifferent or not finding it useful due to it being a necessary procedure for opening an account rather than a protective measure.

‘I like the security of verification so I think the process is worthwhile.’

‘Simply a necessary part of opening an account.’

‘Just something you have to do when you open a new betting account, more of an annoyance than anything.’

**6. What are the main reasons you found the account closure feature useful/not useful?**

65% found the measure useful to some extent

24% did not find the measure useful or not useful

12% did not find the measure useful

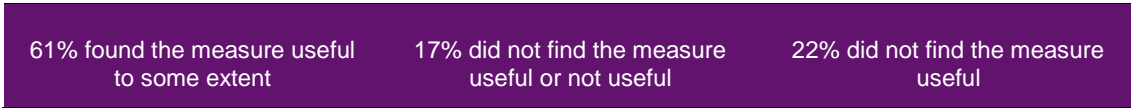
There were 155 responses to this question, with most reporting that they found the account closure feature useful; a quarter of that group reported that their gambling behaviour had changed due to the ability to close their account. However, around one in eight respondents reported that the feature was not effective for them as closing an account only applied to a specific operator and it was easy to move operators or open multiple accounts.

‘After not winning for a long time, I suspended my account to control my desire to recover my lost money.’

‘Helped in short term but easy to circumvent to start again.’

‘Open another account, different site, different venue, anonymous betting machines at the pub, etc.’

**7. What are the main reasons you found the feature for temporary exclusion useful/not useful?**



Fewer respondents commented on the usefulness of temporary exclusion features ( $n = 118$ ). The general themes were very similar to the previous question regarding account closure. Although more than half of participants reported that the feature was useful for controlling wagering involvement, almost a quarter described it as being either ineffective, an overly-complicated process, or not applicable to them as they did not consider themselves at risk of gambling problems. Others noted that the self-exclusion feature was ineffective as it only applied to a specific operator and it was too easy to move operators.

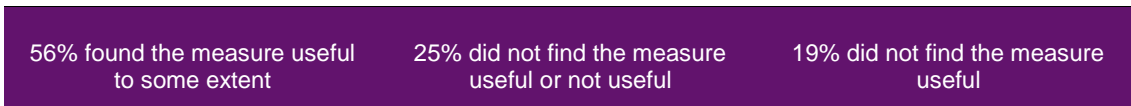
‘Because there are many sites to choose from, not to mention going somewhere like the casino.’

‘Waited until exclusion time expired and increased betting.’

‘I could just open another account with ease from another agency.’

‘Said if I did [temporarily exclude] I’d be blocked forever. Basically felt pressured to keep it open.’

**8. What are the main reasons you found the feature for permanent exclusion useful/not useful?**



Only 63 participants responded to this question about the usefulness of the permanent exclusion feature. Just over half of the respondents reported having found the feature useful, while one in five perceived it as not very useful. A number of respondents to this question described the potential benefits of permanent exclusion for (other) people who might be at risk of experiencing gambling problems.

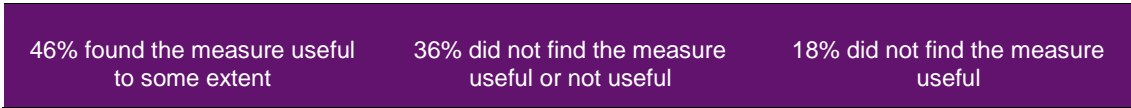
‘Permanent exclusion is the answer for some people.’

‘It gives people with gambling problems a break and time to get help for their problem.’

‘Good for people that know they have a problem.’

‘I do not need to be told not to bet.’

**9. What are the main reasons you found clear and consistent gambling messages useful/not useful?**



Two hundred and ninety-four participants commented on the perceived usefulness of consistent gambling messages, with over half of these participants reporting that they were indifferent or did not find the measure useful. This was often because they didn't perceive the feature to be relevant to them as they weren't experiencing gambling-related problems.

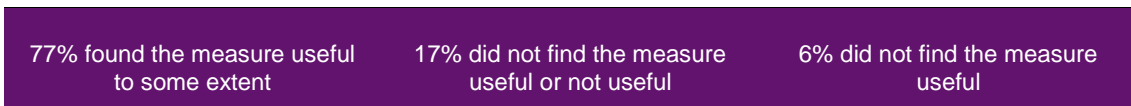
'I do not have a gambling problem, so ignore messages.'

'Only for people with a problem. Don't believe I have a problem.'

'At this stage, the slogan 'Please remember to gamble responsibly' goes in one ear and out the other.'

'Help as a reminder but doesn't help with extra promotions being offered.'

**10. What are the main reasons you found access to regular financial statements useful/not useful?**



The majority of the 378 responses to this open-ended question reported that they found regular financial and activity statements useful for keeping track of their spending and general betting activity. Only a small portion indicated any direct gambling protection, for most the perceived benefit was in tracking wagering activity.

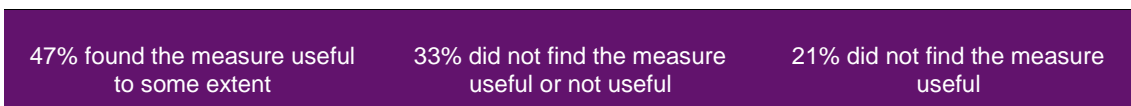
'Because it motivates me not to gamble by seeing my account has nothing.'

'Helps me see how I am travelling as a punter and how I need to reassess the way I gamble.'

'Was a way to track what bets I put on but had no bearing on the way I was betting or what I would bet on.'

'Used it for curiosity rather than to make a change to habits.'

**11. What are the main reasons you found information about staff training regarding responsible gambling useful/not useful?**



Only 92 participants responded to this question; of those, one third reported indifference regarding the usefulness of this feature. Participants may have been unclear about what the question was asking, or may have been unsure or unable to provide a response about whether wagering operators provide training for their staff. This confusion was expected as a significant number of

operators, both large and small, did not provide clear information regarding staff training on their websites, and this was highlighted from the desktop review.

'How do I know what training they are getting?'

'Their training has nothing to do with me.'

There were, however, a number of responses that reported finding the information useful and encouraging.

'They keep you aware of danger of gambling addiction.'

'It guides the customer to a start point should they wish to act on their gambling.'

## Consumer suggestions for further features to prevent or reduce harm

Participants were also asked to describe any other measures or features that they believed online wagering providers could implement to help prevent or reduce gambling-related harm among their customers. In total, 2,822 participants provided responses to this question.

Around one-third of responses related to providing better and consistent messaging, tools and campaigns to reduce gambling-related harm.

'The online betting companies need a disclaimer informing the consumer (gambler) that online betting can affect credit, e.g. applying for loans, etc.'

'I am not the heavy punter but when you do the transactions doing money transfer to the betting companies, they should clearly warn punter about Responsible Gambling. Online betting when transferring money to their account a warning should pop up.'

'Continuously and consistently put out the message that gambling can be addictive and for people to gamble within their means.'

'Less direct advertising, i.e. texts and emails encouraging gambling, and more meaningful campaigns. Just telling people to gamble within their means is not going to make a problem gambler suddenly reform their behaviour.'

Additional advertising restrictions for wagering providers were also commonly mentioned:

'Ban all betting advertisements. They paint an unrealistic image of what gambling is like and actively prey on people most susceptible.'

'Stop the incessant advertising on TV. Don't tell us to gamble responsibly when they don't really want us to. Wipe the 2<sup>nd</sup> and 3<sup>rd</sup> bonus bet offers which suck mugs in.'

'Stop advertising their ads on TV. If someone wants to gamble that bad, they can look for it themselves rather than be handed to them on a silver platter.'

'Stop advertising with huge promises to induce people to gamble and it's always the poor who think they will win big and lose the little that they have.'

Others described features related to the accounts themselves. Suggestions included easier processes to close accounts, instant verification for new cards or deposit methods, and the introduction of non-raisable limits.

'Make the delete account button clear on the top of the account. Limit how much money can be transferred in on a daily basis.'

'Put an extra step in online betting – maybe a toggle function to log in as opposed to just a password.'

'It is too easy to create online betting accounts and having access to funds. I don't have a problem but can see how people can get trapped overspending.'

Finally, a number of participants described the importance of betting limits to curb spending and prevent and reduce harm, especially for those who might be at risk or already experiencing harm.

'Set hard limits on bets. Like a \$100 maximum bet maybe.'

'The account holder being able to set a limit of how much they can bet and when that limit is reached, the account is blocked for a period of time.'

'Sometimes, people tend to overspend on gambling activities and it isn't hard to keep depositing into your online betting account from your bank account through PayPal, POLi, credit cards, etc. Before you know it, you're down a few thousand dollars.'

'More about daily set limits for problem gamblers.'

'Set limits for gamblers who excessively lose.'

## Box 5.1: Summary of findings from consumer survey

- A total of 5,076 people aged 18 and over participated in the online consumer survey.
- Participants were mostly male (77%) with an average age of 48 years. Most reported being Australian-born (81%), non-Indigenous (95%), and speaking only English at home (88%). Around two-thirds (62%) reported living in one of the state capitals and over half (59%) reported being in full-time employment.
- Horse racing (75%), sports betting (53%) and greyhound racing (32%) were the most commonly reported activities to have placed bets on in the past 12 months.
- Over half (55%) reported having spent money on two or more activities during the past 12 months (average 2.1 activities).
- Median frequency of betting on sports and fantasy sports was once a week, and 2–3 times a month for horse, harness and greyhound racing.
- 80–90% of the participants within each activity reported placing bets online using portable devices (e.g. sports 90%; horse racing 83%); less than 10% (across all activities) reported placing bets via telephone call.
- The average spend on each activity on a typical day of betting (across all types of wagering) ranged from around \$50–\$100. For horse racing, the most common typical spend was \$50 and for sports it was \$20.
- Participants reported having an average of 2.3 online wagering accounts; 13% reported having specifically chosen to open an account with an offshore provider at some point.
- 13% reported having been offered lines of credit, and 3.6% were offered credit contracts or referrals to a payday/short-term lender in the past 12 months.
- Just under half (44%) reported having gambled on other products in the past 12 months; most commonly on pokies (38%) and casino table games (18%).
- While a third (35%) reported that they had not employed any strategies to limit their involvement in betting, another 39% had ‘monitored how much money they spent betting’ (39%) and 34% had ‘set limits for how much they can spend each week’.
- According to the PGSI scores, around half of all participants (52%) would be classified as being at risk of or already experiencing gambling related harm; risk was higher among male participants and those aged 18-34 years (compared to older age groups).
- Other harms reported by participants included a reduction of available spending money (24%), reduction of savings (22%), regrets that made them feel sorry about their gambling (18%), and having less spending for recreational purposes (15%).
- 77% reported that they had seen one or more consumer protection feature on betting apps/websites, and 59% reported having used a feature/s. The features that were perceived most useful (among those who had used them) were regular financial statements, clear information about T&Cs, deposit limits, and spend limits.
- Findings from open text questions indicated that the currently available consumer protection features were largely viewed as useful; however, some features were seen as easy to circumvent by opening accounts with different providers, and other features were perceived to only apply to (other) people who may be experiencing gambling problems.

## 6. Summary and future directions

### Overview

While less prevalent than forms of gambling, online wagering is the fastest growing segment of the Australian gambling market (Global Betting and Gaming Consultants, 2018). Recent estimates suggest that around one third (34%) of people who placed a bet on sports, racing or other events in 2017–18 did so via the internet; double the 16% reported six years earlier (in 2011–12) (Roy Morgan, 2018). Compared to non-interactive gamblers, people who gamble online have been found to be more likely to be male, younger, have higher levels of education and income, participate in a larger range of gambling activities, and experience higher rates of gambling-related problems (Gainsbury, 2012; Hing et al., 2014).

As part of the response to recommendations from the Review of Illegal Offshore Wagering (O'Farrell, 2015), a National Consumer Protection Framework for Online Wagering in Australia was developed with input and agreement from Commonwealth and state and territory governments. The intent is to bring Australian consumer protection measures up to date, to ensure they reflect best practice nationally, and to address the current regulatory fragmentation across jurisdictions (DSS, 2017). The National Framework consists of 10 consumer protection measures that provide tools for consumers and requirements for online wagering providers (licensed in Australia) to help mitigate harm related to online wagering activity.

The effectiveness of the National Framework is to be evaluated in four phases over approximately five years. AIFS was commissioned by the Department to develop and conduct the baseline study for the evaluation, prior to the Framework's full roll-out and implementation.

The baseline study aimed to address some of the gaps in the current evidence base and enhance understanding of:

- levels of online wagering involvement, prevalence of risky gambling behaviour, and levels of harm experienced
- consumer motivations to participate in online wagering and the means by which consumers seek to manage and control their wagering activity
- awareness, uptake and perceived usefulness of existing consumer protection features
- jurisdictional consistency in defining the responsible provision of online wagering
- readiness to implement and monitor compliance among service providers and regulators and any opportunities or challenges they foresee.

The study employed a mixed methods approach comprising: a desktop review of the websites of online wagering service providers licensed in Australia and the Commonwealth and state and territory regulators who monitor wagering activities; semi-structured interviews with wagering service providers and regulators; and an online survey of people who wager online in Australia. Data collection for the baseline study was undertaken during March and April 2019.

### Key findings

#### Desktop review

Most of the wagering providers who were reviewed were found to promote or offer one or more types of consumer protection measures via their website (at the time of review); either those already in effect as part of the National Framework, or other tools or features similar to those to



be rolled out over the coming months. For example, while we were restricted to reviewing publicly available websites without access to member-only features, it appeared that all providers had implemented the Framework measures introduced in February 2018 (i.e. no providers were offering lines of credit or small amount credit contracts), and most had implemented the customer verification measure time frame (14 days maximum) introduced in February 2019.

Without access to member-only features it was difficult to assess whether wagering providers had already implemented the account closure and voluntary opt-out pre-commitment deposit limit measures (scheduled for May 2019), but across the providers, a range of similar protective measures were available for customers. Timed limits for deposits, spending and withdrawals appeared to be the most common features offered, and the feedback from the open text consumer survey responses suggested that customers found these limits helpful to counter impulsive or excessive betting. A number of the major providers also offered more specific features such as gambling calculators and diaries, allowing customers to maintain a detailed record of their wagering activity.

It was evident from our desktop review that a wide variety of inducements were still being offered at the time of the review, with almost all providers continuing to promote incentives for opening an account. Future stages of the evaluation will be able to assess whether providers have implemented the measure to restrict all specified inducements in applicable jurisdictions (scheduled for May 2019).

'Responsible gambling' messages and links to gambling support services were made available by most providers, but the types and amount of messaging varied between providers. Open text responses from the consumer survey suggested that customers were often indifferent to these messages or perceived them as only being useful to people who may already be experiencing gambling-related problems. A number of consumers reported that 'responsible gambling' messaging could be improved to reduce gambling-related harms among people who wager online.

At the time of the review only a minority of state and territory regulator websites contained any information about the National Framework or links to further information, but all of the reviewed Commonwealth websites provided some detail, including the National Policy Statement or a link to it.

## Key stakeholder interviews

### Regulators

Overall, regulators were broadly supportive of the National Framework and felt it was a positive development in encouraging stronger consumer protection measures and promoting the regulation of online wagering in Australia. At the time of interview, most regulators reported having a good understanding of the Framework measures and the time frames associated with implementation. However, the varying regulatory frameworks in each state and territory were reportedly causing some difficulty in efforts to harmonise regulation, in addition to tight deadlines for implementation of the measures due to come into effect by May 2019. Differing standards across jurisdictions for measures such as inducements, and their regulatory approaches varying between point of supply and point of consumption, also proved an issue for some states and territories.

For these regulators, the issue was in the details of implementation of the measures, rather than the measures themselves. For example, all jurisdictions agreed on the need for effective, evidence-based consistent gambling messages. Several jurisdictions planned to implement the

Framework measures either through licensing conditions, legislative or regulatory change, or changes to Codes of Practice. Once measures come into effect, and there are minimum standards across jurisdictions, implementation challenges are likely to be addressed. In addition, the continuation of the Governance Committee would provide a forum for cross-jurisdictional issues to be addressed by the Commonwealth and states/territories as they arise.

## Providers

Wagering providers were also generally supportive of the National Framework and saw it as a way to achieve greater consistency in service provision across the wagering industry in Australia; however, at the time of interview there was a degree of frustration expressed that specifics had not been communicated by some jurisdictions, particularly given the short time frame to implement the three measures scheduled to come into effect in May 2019. Concerns linked to this related to the possibility of different consumer protection requirements in different jurisdictions, and the business uncertainty and costs to wagering providers. However, the larger providers noted that differences currently exist between jurisdictions, and overall harmonisation of measures nationally was a positive outcome. They had also been aware of the Framework measures from their inception.

Many providers were already partially or fully implementing some Framework measures, and none expressed a view that the measures themselves were unreasonable. Criticism arose around the lack of detail; however, many larger providers and industry bodies had been in dialogue with certain regulators for some time prior to implementation. Some wagering providers expressed concerns about unintended consequences of some Framework measures, including consumers possibly moving to offshore providers with fewer protections, although it remains to be seen if this will occur.

## Consumer survey

The online survey of 5,076 people who wagered online in Australia in the past 12 months was conducted to assess consumer characteristics, levels of wagering involvement and related harm, self-management strategies, and awareness, uptake and perceived usefulness of existing consumer protection features.

Participants in the online survey were mostly male, aged in their 40s, Australian-born, married or in another type of relationship, educated, employed, and securely accommodated. Just under two-thirds reported residing in one of the state capitals, with the remainder in the territories or regional areas of Australia. The demographic profile of participants in this sample is largely consistent with previous research conducted with people who wager online in Australia (Gainsbury, Russell, Hing & Blaszczynski, 2018; Gainsbury, Arbarbanel & Blaszczynski, 2018; Hing et al., 2014).

Horse racing (75%), sports (53%) and greyhound racing (32%) were the activities most commonly wagered on during the previous 12 months, with frequency of betting on sports around once a week (which aligns with how sporting competitions are often scheduled), and for racing around 2–3 times a month. The majority (80–90% for each activity) reported having placed bets online using mobiles/smartphones, followed by computers (40–50%), with around one-quarter each also betting via self-service terminals or in-person. The accessibility of online (and especially smartphone) wagering facilitated the placing of bets via multiple locations, including home (80–90%), licenced venues (30%), work (25%), friend/family home (23%), and sporting event/racetrack (23%).

The participants' main motivations to wager online were often linked to enjoyment, with the largest proportions reporting, 'I enjoy a punt', 'betting on an event makes watching sports/races more interesting' and 'betting is a social activity'. The average spend on each activity on a typical day of betting ranged from around \$50–\$100, with the most common typical daily spend for horse racing being \$50, and sports \$20. Participants currently had an average of 2.3 online wagering accounts, with 13% having elected to open an account with an offshore provider at some point. Around two-thirds reported having employed strategies to manage the amount of money or time spent betting online during the past 12 months, with most reporting that they 'monitored how much money they spent betting' or they 'set limits for how much they spend each week'.

Experience of gambling-related harm was assessed via the PGSI (Ferris & Wynne, 2001) and Gambling Harms Scale (Browne et al., 2017). Based on the PGSI, around half of all participants (52%) were classified as being at risk of or already experiencing gambling-related harm; with 25% classified as low risk, 19% moderate risk, and 8% problem gambling. The levels of harm observed among this sample are higher than that reported in the *Interactive Gambling* study (Hing et al., 2014), which found that among interactive gamblers who participated in the online survey, one-third (33%) were classified at risk of or already experiencing harm (22% low risk, 10% moderate, and 1% problem gambling). Additional harms captured as part of Browne and colleagues (2017) gambling harms scale included a reduction of available spending money (24%), reduction of savings (22%), regrets that made them feel sorry about their gambling (18%), and having less spending for recreational purposes (15%). Future stages of the evaluation will be able to examine trends in gambling-related harm among people who wager online.

Participants were also asked about their awareness, uptake and perceived usefulness of different consumer protection measures and features. While most of the 10 National Framework measures had yet to be implemented at the time of the survey, a number of wagering providers, in particular some of the larger providers, were already offering some tools or features similar to those to be rolled out over the coming months (as identified as part of the desktop review). Around three-quarters of participants reported having seen one or more consumer protection-type features, and over half reported having used at least one feature; most commonly features to set deposit or spending limits.

While available consumer protection measures were generally perceived as being useful – particularly regular financial statements, clear information about terms and conditions, deposit limits and spend limits – open text responses revealed that many participants did not view themselves as experiencing gambling-related harm and felt that some of the features applied more to people 'at risk' or already experiencing gambling problems. It is possible that a lack of perceived risk of gambling-related harm among people who wager online could affect uptake of consumer protection features; this is something that could be examined in future stages of the evaluation.

## Study limitations

This study has provided valuable baseline data that will enhance understanding of gambling behaviours and related harm among people who wager online in Australia, and of how wagering providers and Australian regulators perceive and plan to implement and monitor the National Framework. This baseline data will help to inform the ongoing development and roll-out of the Framework over time, and will provide a comparison for future waves of the evaluation.

There were, however, a number of limitations that should be considered. First, while the desktop review provided important insights into the types of consumer protection measures that wagering providers currently offer, for ethical reasons we did not open an online wagering account/s and

the information reviewed is therefore limited to publicly available websites (i.e. no access to member-only features such as activity statements or account closure features). For the same reason, we were unable to access wagering provider apps. Apps are commonly used and may provide quicker and more streamlined access to betting options for customers. Reviewing member-only features via both apps and websites would provide a more comprehensive overview of the protective measures that wagering providers offer.

Second, while we were able to interview regulators in every state and territory and the Commonwealth, together with most of the large and some smaller online wagering providers, the views and opinions expressed are those of the individual participants. The findings from these interviews may not reflect the views of their workplace/organisation, nor be a true or accurate reflection of the National Framework's development and implementation processes.

Third, the target sample for the consumer survey was people living in Australia, aged 18 or over, who had placed a monetary bet online in the last 12 months. While we were able to recruit a very large sample of participants via 11 different mid-large wagering operators, this is a convenience sample of people who self-selected to complete the survey and, as such, the findings may not be representative or generalisable to the wider population of adults who wager online in Australia. Further, while confidentiality was assured and there were no negative consequences of disclosure, participant responses were based on self-report and may be subject to some social desirability or recall bias.

Finally, all baseline data collection was undertaken within a short timeframe during March–April 2019. While it was important to ensure that data were collected prior to the roll-out of most Framework measures, issues or concerns raised in this report (e.g. as part of the desktop review or by regulators or providers) may have been addressed or resolved since that time. Future phases of the evaluation will improve understanding of how these findings change over time.

## Recommendations for government

The intention of the National Framework is to reduce the harm of online wagering to consumers by bringing Australian consumer protection measures for online wagering up to date, ensuring they reflect best practice nationally, and addressing the current regulatory fragmentation across jurisdictions.

We recommend the following points be considered as part of the ongoing development and roll-out of the National Framework:

- Continue to work towards harmonisation of minimum online wagering regulations across jurisdictions, while retaining the ability of jurisdictions to impose higher standards.
- Ensure continuation of the implementation Governance Committee to facilitate ongoing dialogue between jurisdictions, address and work to reconcile cross-border issues, and provide regular reports and updates on breaches of regulatory conditions.
- Continue to work towards greater transparency and improved communication between regulators and wagering providers, particularly with regard to the roll-out of upcoming measures and any future amendments to the Framework that may affect providers' compliance requirements.
- Develop consistent evidence-based gambling messages from a harm reduction perspective, with input from consumers, particularly in relation to consumers who view themselves as being at low-risk of gambling-related harm.
- Prioritise the development and implementation of the national self-exclusion register.

- Ensure individual framework measures continue to be evidence-based to prevent and reduce harm for people who wager online, with appropriate modifications as the evidence base develops.

## Recommendations for future stages of the evaluation

In terms of the evaluation itself, we recommend the following approaches be considered to enhance data collection and improve understanding of the uptake, usefulness and effectiveness of the National Framework measures for consumers, and opportunities or challenges for regulators and wagering providers:

- Replicate the baseline study, with some modifications or additional areas of focus; for example:
  - Desktop review: consider extending the desktop review to include wagering provider apps (in addition to websites) and investigate how features that are only accessible to active account holders might be reviewed, while still ensuring ethical and other organisational compliance.
  - Stakeholder views: while the interviews provided valuable insights, it may be useful for the researchers to attend the Governance Committee or industry briefing meetings (in-confidence and where appropriate) to gain a more nuanced understanding of the issues.
  - Consumer survey: consider investigating issues related to the Framework in more detail (where time allows); for example, instances where consumer protection features may not be being implemented as planned (e.g. participants having been offered lines of credit), or where there may be unintended consequences (e.g. consumers opening accounts with offshore providers, or with multiple providers in order to circumvent certain features), and consumers' perceptions of their risk of experiencing gambling-related harm.
- Conduct qualitative interviews with people who wager online:
  - Consider including a qualitative interview component to allow for further in-depth investigation of findings emerging from the consumer survey, including: consumer uptake and perceptions of the usefulness of individual measures and the Framework as a whole; any unintended consequences resulting from the implementation of any measures; other insights into consumers' interactions with wagering providers; and consumers' perceptions of gambling-related harm and whether they believe they may be at risk of experiencing harm.
- Investigate any relevant secondary data sources; for example (where available), the number of regulatory or licence breaches related to the Framework measures and trends in gambling-related harm data (e.g. calls to services such as Gambling Help Online).

## References

- Armstrong, A., & Carroll, M. (2017a). *Gambling activity in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Armstrong, A. R., & Carroll, M. (2017b). *Sports betting in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Armstrong, A., & Carroll, M. (2017c). *Race betting in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Australian Communication Media Authority. (2019). *Credit betting ban*. Canberra, Australia.
- Browne, M., Goodwin, B., & Rockloff, M. (2017). Validation of the Short Gambling Harm Screen (SGHS): A tool for assessment of harms from gambling. Doi: 10.1007/s10899-017-9698-y
- Capic, T., Fuller-Tyszkiewicz, M., Cummins, R. A., Khor, S., Richardson, B., Greenwood, C., Olsson, C., & Hutchinson, D. (2018). Australian Unity Wellbeing Index: Report 35.0, Financial Control. Geelong: Australian Centre on Quality of Life, School of Psychology, Deakin University. <http://www.acqol.com.au/projects#reports>.
- Communio. (2018). *Performance, Review and Evaluation Strategy (PRES) and cost options for the National Consumer Protection Framework (NCPF) for Online Wagering in Australia*. Report to the Department of Social Services, Gambling Policy Section, Welfare Quarantining and Gambling Branch. Confidential report.
- Department of Social Services (DSS). (2017). *A national consumer protection framework for online wagering in Australia: Decision regulation impact statement*. Canberra: DSS.
- Department of Social Services (DSS). (2018). *National consumer protection Framework for online wagering in Australia: National policy statement*. Canberra, Australia.
- Ferris, J.A., & Wynne, H. J. (2001). *The Canadian problem gambling index* (pp. 1–59). Ottawa, ON: Canadian Centre on Substance Abuse.
- Gainsbury, S. M. (2012). *Internet Gambling: Current Research Findings and Implications*. Berlin: Springer Science & Business Media.
- Gainsbury, S., Arbarbanel, B. & Blaszczynski, A. (2018). Factors influencing internet gamblers' use of offshore online gambling sites: Policy implications. *Policy & Internet*. doi.org/10.1002/poi3.182.
- Gainsbury, S., Russell, A., Hing, N. & Blaszczynski, A. (2018). Consumer engagement with and perceptions of offshore online gambling sites. *New Media and Society*, 20(8), 2990–3010.
- Global Betting and Gaming Consultants (GBGC). (2018). *Interactive Gambling Dataset 2018*. Isle of Man: GBGC.
- Goodwin, B. C., Browne, M., Rockloff, M., & Rose, J. (2017). "A typical problem gambler affects six others." *International Gambling Studies*, 17(2), 276-289
- Hing, N., Gainsbury, S., Blaszczynski, A., Wood, R., Lubman, D., & Russell, A. (2014). *Interactive Gambling*. Melbourne, Australia: Gambling Research Australia.
- International Wellbeing Group (2013). *Personal Wellbeing Index: 5th Edition*. Melbourne: Australian Centre on Quality of Life, Deakin University.
- Jenkinson, R., de Lacey-Vawdon, C., & Carroll, M. (2018). *Weighing up the odds: Young men, sports and betting*. Melbourne: Victorian Responsible Gambling Foundation.
- O'Farrell, B. (2015). *Review of illegal offshore wagering: Report to the Ministers for Social Services and the Minister for Communications and the Arts*. Canberra: DSS.
- Queensland Government Statistician's Office (QGSO), Queensland Treasury. (2018). *Australian Gambling Statistics*, 34th edition. Brisbane: Queensland Government Statistician's Office.
- Roy Morgan. (2018b). *Mobile betting drives growth in online wagering*. Melbourne: Australia.

## Appendix 1: Literature review

This literature review describes the key features of the gambling environment in which the evaluation is taking place. It describes levels of wagering participation and related harm in Australia, the current legislative and environmental context in which wagering service providers and regulators operate, and the evidence underpinning the 10 proposed consumer protection measures.

### Wagering activity in Australia

#### The size of the wagering market

The latest industry-based revenue figures show that in 2016–17 wagering comprised \$4.3 billion, or 18% of the \$23.7 billion spent on gambling in Australia (Queensland Government Statistician's Office [QGSO], 2018).<sup>1</sup> Race betting is the dominant form of wagering, making up around 75% of wagering expenditure (\$3.3b), with sports betting comprising around 25% (\$1b; QGSO, 2018).

The estimated breakdown of expenditure across the varied activities comprising racing and sports wagering is provided in Table A1.1.

**Table A1.1: Wagering expenditure by activity, 2016–17**

Wagering activity	\$ in millions <sup>a</sup>	% Total wagering expenditure <sup>b</sup>
<b>Racing</b>	3,300	75
Horse racing	2,200	51
Harness racing	550	13
Greyhound racing	500	11
<b>Sports</b>	1,000	25
NRL/State of Origin	300	8
AFL	300	7
All other sports (e.g. tennis, cricket, basketball)	450	10

Notes: Expenditure figures rounded to nearest whole number.

<sup>a</sup> Italicised expenditure estimates were extrapolated from the application of % revenue shares reported by Roy Morgan Research (2018a).

<sup>b</sup> Total racing and sports expenditure reported in Australian Gambling Statistics (QGSO, 2018).

#### The online wagering market

Online wagering is the fastest growing segment of the gambling market in Australia. From 2016 to 2017, there was an estimated 18% increase in active online sports betting accounts (Global Betting and Gaming Consultants [GBGC], 2018). Globally, online sports betting represents approximately 6.5% of the overall gambling market (GBGC, 2018).

<sup>1</sup> The Department defines wagering as an activity where a person gambles on the outcome of racing, sporting and other events, or on contingencies within an event. Interactive or online wagering refers to these forms of activity where the internet, or any other telecommunication method (such as telephone), is the mechanism for placing the wager<sup>1</sup> (DSS, 2017).

Most online wagering is conducted through the 133 interactive wagering service providers licensed in Australia.<sup>2</sup> Somewhere between 74% and 95% of all wagering expenditure by Australian customers is estimated to take place through these providers, with the remainder (5–26%) spent with offshore operators (O’Farrell, 2015).

Harm minimisation is one of the primary reasons behind the introduction of Australian regulations for online wagering, with the rationale that domestically licensed providers, who are obligated to comply with local regulations, will provide appropriate harm-reduction measures and operate in a safe, reputable manner (DSS, 2017; O’Farrell, 2015). Recent amendments in 2017 to the *Interactive Gambling Act* (2001) have strengthened regulation and enforcement of Australian providers, and prohibit offshore providers from soliciting or providing online gambling services to Australian consumers.

Around one-third of the wagering providers licenced in Australia are mid-large sized TABs, corporate bookmakers and betting exchanges. Each provider is licenced with one state or territory licensing authority, but they typically provide wagering services across multiple jurisdictions. On-course bookmakers, generally much smaller and more limited operationally, make up two-thirds of registered Australian providers and generally operate within a single jurisdiction.

A breakdown of licensed providers by jurisdiction and type is provided in Table A1.2.

**Table A1.2: Licensed interactive wagering providers by jurisdiction and type**

Interactive wagering providers	Number of licensed interactive wagering providers	% located in each jurisdiction
<b>Providers by state</b>		
ACT	1	1
NSW	28	21
NT	31	23
TAS	2	2
QLD	1	1
SA	5	4
VIC	39	29
WA	26	20
<b>Providers by type</b>		
TABs, corporate bookmakers and betting exchanges	42	32
On-course bookmakers	91	68
<b>Total</b>	<b>133</b>	<b>100</b>

Source: Data extrapolated from ACMA (2018)

## Online wagering participation

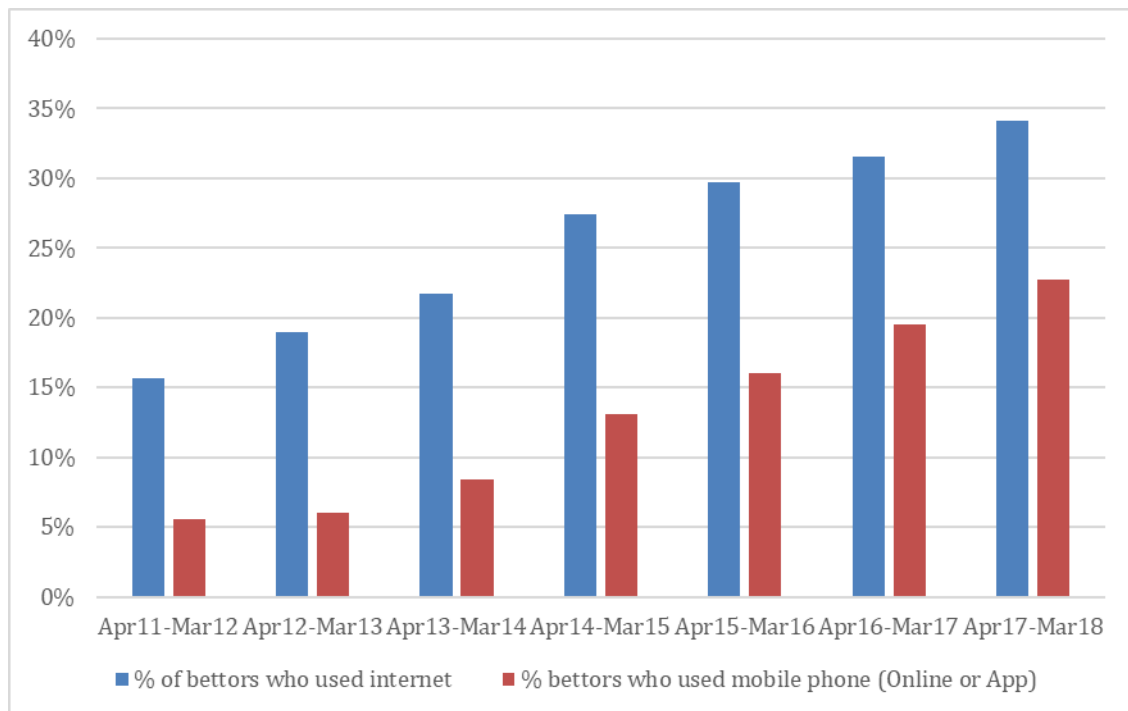
Recent survey data suggest that race betting is the fourth most common gambling activity in Australia (by expenditure per individual) followed by sports betting – after lotto, instant scratch tickets and EGM participation (Armstrong & Carroll, 2017b). Estimates suggest that around 3.4

<sup>2</sup> As reflected on the Australian Communications and Media Authority’s (ACMA) list of regulated providers.



million Australians wagered in the 12 months to March 2018, a decrease from the 3.7 million who wagered in 2012 (Roy Morgan, 2018a, b). However, this decrease in overall wagering has been countered by an increase in online wagering, with 34% of Australians betting via the internet, compared to 16% in 2012 (Roy Morgan, 2018b). This growth in online wagering is being driven by a significant increase in the use of mobile/smartphones to place bets; approximately 23% of bettors are estimated to have used their phones to wager in 2018, compared to only 6% in 2012 (Figure A1.1).

Figure A1.1: Proportion of bettors who wagered using the internet and mobile phones, 2012–2018



Source: Data extrapolated from Roy Morgan (2018b).

Most people who wager online report having multiple accounts. Research suggests that on average, people who wager report having 2–3 accounts (Gainsbury, Russell, Blaszczynski, & Hing, 2015), but that those who bet weekly or more often, and who may be more prone to risky gambling behaviour, report having a larger number of active accounts (Jenkinson et al., 2018).

Compared to non-interactive gamblers, people who gamble online have been found to be more likely to participate in a wider range of gambling activities, and to have a higher frequency of gambling participation (Gainsbury, 2012; Hing, Gainsbury et al., 2014). For example, half (54%) of interactive gamblers who reported betting on sports in the *Interactive Gambling* study reported betting weekly or more often, compared to 15% of non-interactive gamblers; and similar proportions were reported for race betting (48% of interactive gamblers bet weekly or more often, compared 13% of non-interactive gamblers; Hing, 2014). Another recent study of young men who wagered on sports found that half (51%) reported having bet (on one or more sports) at least weekly (Jenkinson et al., 2018).

Household Income and Labour Dynamics in Australia (HILDA; Wave 15) data suggests that participation in other forms of gambling is common among those who bet regularly on sports and races: over half (57%) of those who regularly bet on sports also regularly bet on races, while one-third (33%) of those who regularly bet on races also placed regular sports bets. For both of

these groups, regular participation in lotteries (sports: 46%, races: 54%) and EGMs (sports: 27%; races: 29%) was also common (Armstrong & Carroll, 2017a).

## Socio-demographic characteristics of the Australian wagering population

People who wager on sports and races in Australia share a number of socio-demographic characteristics (Armstrong & Carroll, 2017a). For example, analysis of the HILDA survey (Wave 15) found that people who regularly (i.e. monthly or more often) bet on sports and racing were often male (88% and 81% respectively), to worked full-time (70% and 56% respectively), and had higher-than-average incomes (55% and 44% respectively). Sports bettors were most commonly aged between 18 and 49 (75%), while those who bet on racing were slightly older, mostly aged between 30 and 64 (66%) (Armstrong & Carroll, 2017c).

While less is known about the Australian online wagering population specifically, findings from the *Interactive Gambling* study suggest that people who gamble via the internet in Australia are more likely to be male, younger, have higher educations, higher incomes, participate in a greater range of gambling activities, and have higher rates of gambling problems, compared to non-interactive gamblers (Gainsbury, 2012; Hing, Gainsbury et al., 2014).

## Gambling motivations and self-regulation strategies

Understanding the motivations for wagering and self-regulation strategies can further inform the refinement of National Framework measures, including the development of relevant gambling messaging.

One nationally representative study of gambling motivations in the UK ( $N = 7,756$ ; British Gambling Prevalence Survey data) found that young males who regularly gamble, including those at risk of gambling problems, were more likely to gamble for enhancement (i.e. for the challenge, to compete against others, for the sense of achievement, excitement) or coping (i.e. gambling to relieve tension or impress others) (Wardle et al., 2011). Another recent study of young Australian online sports bettors using a self-selected sample ( $N = 335$ ) suggests the addition of social motivations (e.g. gambling to be sociable) may characterise the Australian online wagering population, including those at greater risk of harm (the 'Weighing up the odds' [WUTO] study; Jenkinson, de Lacy-Vawdon, & Carroll, 2018).

People who gamble are known to use a broad range of resources and strategies in attempts to stay within personal limits (Jenkinson, de Lacy-Vawdon, & Carroll, 2018; Moore, Thomas, Kyrios, & Bates, 2012; Rodda, Dowling, & Lubman, 2018; Rodda, Bagot et al., 2018). Within the WUTO study of Australian online bettors, the most common strategies were to monitor spending, set weekly limits, substitute betting with other activities, and suspend or cancel betting agency subscriptions (Jenkinson, de Lacy-Vawdon, & Carroll, 2018).

## Risk profile of Australians who wager

Research regularly identifies wagering as a high-risk form of gambling. For example, an international review of gambling prevalence studies found that sports betting was one of the forms most strongly associated with problem gambling (Williams, West, & Simpson, 2012). Analysis of industry wagering data has linked race betting (Armstrong, Thomas, & Abbott, 2018) and sports betting – particularly live-action online betting – with problem gambling (Brosowski, Meyer, & Hayer, 2012; LaPlante, Nelson, & Gray, 2014).

Analysis of the Problem Gambling Severity Index (PGSI) data from the most recent HILDA survey identified regular sports betting and race betting as two of the highest risk gambling activities.

Approximately 230,000 people who placed regular sports bets and 400,000 people who placed regular race bets experienced some level of gambling-related harm in the preceding year (see Table A1.3); equating to around 40% of bettors on either activity reporting one or more problems.<sup>3</sup>

**Table A1.3: Proportion and number of Australians who regularly bet on race and sports, by gambling harm risk group**

Gambling harm risk	Regular race bettors		Regular sports bettors	
	%	n ('000)	%	n ('000)
No problems	59	572	59	340
Low risk	19	190	17	99
Moderate risk	17	164	17	98
Severe risk (problem gamblers)	5	50	6	36

Note: Estimates are based on weighted data from the 2015 Household Income and Labour Dynamics in Australia survey

Bettors at risk of experiencing problem gambling were more likely to be single, male, renting and, among sports bettors, aged 18–29 (Armstrong & Carroll, 2017a-c). Follow-up analysis of HILDA data by the AGRC found that greater expenditure on either race or sports wagering was associated with greater risk of gambling-related problems, irrespective of gamblers' participation in other activities or socio-economic characteristics.

## Types of harm

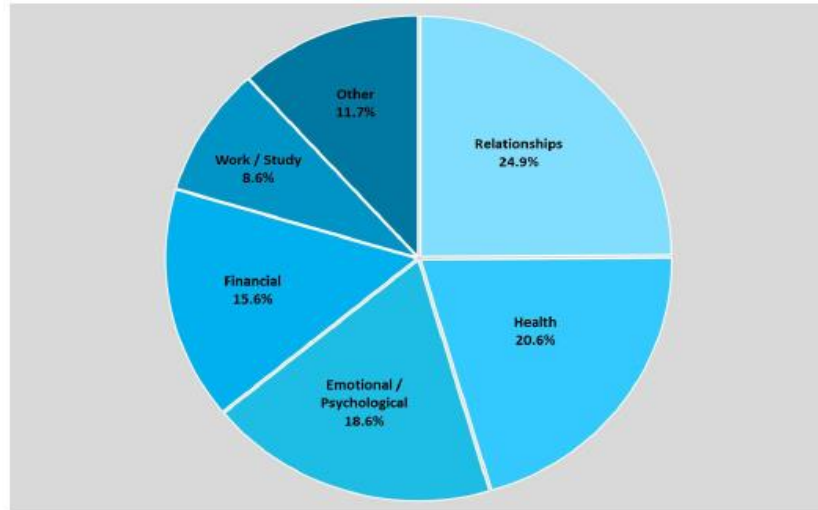
Gambling-related harms not only affect the people directly involved, but also their families, peers and the wider community. The social cost of gambling takes into consideration the external burden to society. In 2010, it was estimated that the social costs of problem gambling in Australia ranged from \$4.7–\$8.6 billion annually (Productivity Commission, 2010). More recently, an estimate that also included the costs associated with people who gamble at low- and moderate-risk levels estimated the social costs of gambling, including adverse effects to emotional, physical, relationship and family wellbeing, to be about \$7 billion in Victoria alone (Browne et al., 2017). Browne and colleagues (2017) estimated that, on average, six others are directly affected by a person gambling at high-risk levels, with three others and one other affected by those gambling at moderate- and low-risk levels, respectively.

At the population level, most aggregate harm caused by gambling is accounted for by those in the low- and moderate-risk groups, rather than the smaller number of those identified as 'problem gamblers' (Browne et al., 2016). The burden of harm associated with gambling problems has

<sup>3</sup> HILDA Survey participants completed the Problem Gambling Severity Index (PGSI; Ferris & Wynne, 2001, a commonly used scale consisting of nine items that captures problematic behaviours and harms caused by gambling in the past 12 months. The higher the score, the greater the gambling-related harms. Gamblers classified as with 'No problems' report no problematic gambling behaviour or harm on this scale. Low-risk and moderate-risk gamblers score between 1 to 7 and report a low or moderate number of problematic behaviours and/or harms, which may however lead to significant harms. They are considered as being at low to moderate risk of becoming problem gamblers. Problem gamblers report severe problematic behaviour and/or harms.

recently been estimated at about 60% of that associated with alcohol use and dependence (Browne et al., 2017). Relationship, health, emotional/psychological and financial factors are reported to be the most instrumental in driving gambling-related harms that adversely impact quality of life for people who gamble (Figure A1.2).

**Figure A1.2: Proportion contributed by each domain to quality of life**



Source: Browne et al., 2016, p. 136.

In a recent study conducted by the AGRC on place-based gambling, the different types of harms described by participants who gambled included family breakdown, family violence and other crimes, mental illness and suicide. All interview participants described financial harms, and reported that gambling harms could escalate their situation to crisis levels very quickly. The study also found that legacy effects of gambling harms represent substantial opportunity costs, and often impose enduring financial and relationship costs on people who gamble, their families and communities (Rintoul & Deblaquiere, 2019).

In relation to harms associated with online gambling, a study of interactive gamblers conducted in 2011–12 reported higher rates of psychological distress, relationship breakdown, loss of contact with children, change or loss of employment, bankruptcy and loss of savings in interactive compared to non-interactive gamblers (Hing, Gainsbury et al., 2014).

Gambling and other help services have also reported an increase in the number of clients reporting that online gambling is the main cause of their problems (Blaszczynski & Hunt, 2011; Hing, Gainsbury et al., 2014; Rintoul & Deblaquiere, 2019). Of callers to gambling services in Sweden and Australia, 44% and 30% respectively, reported that online gambling was the main cause of their problems (Hing, Gainsbury et al., 2014).

## Legislative responsibility for the National Framework

There are examples of interactive wagering legislation, regulation and codes of practice that have not received substantial amendments since their enactment, and thus do not reflect the rapid developments that characterise the online wagering environment (O'Farrell, 2015). Further, inconsistent application of consumer protections across jurisdictions has resulted in poorer outcomes for consumers and providers, and online wagering providers licensed in jurisdictions

with stronger regulation are at a competitive disadvantage in terms of compliance and service costs, resulting in 'jurisdiction shopping' by some providers.

The National Framework was officially launched by Commonwealth and state and territory governments on Friday, 30 November 2018. It is intended to be rolled out progressively to mid-2020. The National Framework comprises 10 consumer protection measures, implemented through a combination of Commonwealth, state and territory laws and regulations as detailed in the National Policy Statement (DSS, 2018).

The Commonwealth Government is responsible for enacting and administering – including monitoring, enforcing, and promoting compliance – the following measures:

- prohibition of lines of credit, pursuant to the Commonwealth's *Interactive Gambling Amendment Act 2017*
- discouraging links with small amount credit contract providers (payday lenders), pursuant to the Commonwealth's *Interactive Gambling Amendment Act 2017*
- customer verification period, pursuant to the Commonwealth's Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.10)
- a national self-exclusion register, pursuant to further amendments to the Commonwealth's *Interactive Gambling Act 2001*.

The Commonwealth is also coordinating trialling, testing and evaluation of measures, in addition to chairing a governance committee of Commonwealth and state and territory officials to oversee the Framework's implementation.

State and territory governments are responsible for enacting and administering, including monitoring, enforcing and promoting compliance with, the following measures:

- offering of inducements
- account closures
- voluntary opt-out pre-commitment
- activity statements
- consistent gambling messaging
- staff training.

While all governments share responsibility for implementing the 10 measures, each government will determine how to implement these in the context of the legislative framework and regulatory tools available in its jurisdiction, and while maintaining national consistency.

## Evidence underpinning the National Framework's 10 consumer protection measures

The 10 measures comprising the National Framework include a suite of tools available for use by individuals, as well as requirements for interactive wagering service providers, to help mitigate the risk of harm. The measures are designed to provide consumers with strong, nationally consistent minimum protections, as recommended by the O'Farrell review and built upon by stakeholder advice and the growing evidence base for both online and terrestrial gambling. The consumer protection measures are designed to both prevent and provide support for those experiencing gambling-related harm, and respect consumer choice by empowering consumers to make more informed decisions about their gambling (DSS, 2018).

## Prohibition of lines of credit offered by online wagering providers

The first measure prohibits the offering or provision of credit by interactive wagering service providers for wagering purposes, with the exception of on-course bookmakers' telephone-based betting services (DSS, 2018). This measure aligns with a policy of prohibiting lines of credit for most other gambling products including EGMs and casinos (DSS, 2017). The banning of lines of credit was enacted into Commonwealth legislation through the *Interactive Gambling Amendment Act 2017* and implemented in February 2018.

Academics and the community sector have argued that a line of credit can act as an inducement for some gamblers, including problem gamblers, to bet more than they can afford (O'Farrell, 2015). The findings of a study by Financial Counselling Australia (2015) reported that some Australian sports betting companies had been actively encouraging customers to bet using credit provided after initial funds were exhausted. 'Free bets' were a common initial inducement, followed by the provision of credit. When customers stopped betting with one company, companies reportedly swapped customer lists to entice the person to resume betting with 'free money' or credit. This extended to people who had been actively identified by industry employees as struggling to pay back existing credit and who were close to being referred to a debt collection agency.

The strengthening of the *Interactive Gambling Amendment Act 2017* should address concerns that offshore wagering providers will continue to offer lines of credit, or lead Australians who gamble to obtain credit outside of domestic regulatory protections (DSS, 2017).

## Discouragement of payday lending for online wagering

The second measure prohibits online wagering operators from sharing customer information and referring customers to payday lenders (DSS, 2018). As with the credit prohibition, this was legislated via the *Interactive Gambling Amendment Act 2017* and implemented in February 2018.

This measure responds to concerns that customers of online providers were being directed to payday lenders through advertising on providers' websites or through direct partnerships between lenders and providers, with customers quickly finding themselves in financial difficulty (O'Farrell, 2015). This is supported by interviews conducted with stakeholders across the gambling sector by Financial Counselling Australia (2015), which found that some people were borrowing from online payday lenders to fund their online wagering and resultant debts. Financial Counselling Australia (2016) highlighted cases where financially vulnerable individuals may chase their losses by borrowing even more money, and questioned whether credit for gambling can ever legally be considered to be within the applicants 'needs and objectives' under the *National Consumer Credit Protection Act 2009*.

## Reduction in the time frame for customer verification

The third measure is for the online wagering customer verification period to be reduced to 14 days, with the feasibility of a reduction to a 72-hour period to be further explored (DSS, 2018). This measure came into effect in February 2019.

In specific terms, online wagering operators were previously required to verify a customer's identity within 90 days of opening an online wagering account, in line with Part 10.4 of the Anti-Money Laundering and Counter-Terrorism Financing Rules (AML/CTF; 2006). In one point of jurisdictional difference, a 45-day limit applied in the Northern Territory as specified under the NT Code of Practice (Department of Trade, Business & Innovation, 2016). Customers of providers in all jurisdictions were prohibited from withdrawing any funds from their account before verification of their identity (DSS, 2017).

The O'Farrell review (2015) suggested that previous time frames vastly over-estimated the time required to verify customers' identities. It was suggested that they did not reflect the ease or speed with which online customers could be identified with current technology, and that it allowed for an extended period in which persons who were underage or self-excluded could wager online, or in which persons engaged in match fixing or money laundering could not be detected.

## Restrictions to inducements across jurisdictions

The fourth measure provides a consistent set of six core minimum consumer protection standards around the provision of inducements by online wagering providers (DSS, 2017). State and territory governments are scheduled to implement these standards by May 2019 (DSS, 2018).

These standards include the following features (DSS, 2018):

- Offering any credit, voucher, reward, or other benefit as an incentive to open an account or refer another person to open an account is prohibited.
- Any credit, voucher, reward, or other benefit that is not part of an approved loyalty program must not be offered.
- Winnings from a complementary betting credit or token (i.e. bonus bet) must be able to be withdrawn without being subject to any turnover requirements.
- All direct marketing to customers may only be sent to customers who provide their express consent to receive this material.
- A customer must be able to unsubscribe from receiving direct marketing materials and the link to unsubscribe must be functional and easily accessible.
- No further direct marketing materials may be sent to the consumer from the time their unsubscribe request is received.

All Australian jurisdictions have had varying restrictions for inducements offered by online wagering providers. The most prohibitive have been in New South Wales (NSW) and South Australia (SA). In NSW, regulations have prohibited gambling advertising that offers any sort of inducement to participate in any wagering activity, including opening a betting account and any inducement offered with a disclaimer. An exception has been that inducement offers are allowed to be marketed to people who have existing wagering accounts. In SA, all inducements have been banned except for the offering or provision of participation in an acceptable loyalty program. Interstate online wagering providers are prohibited from offering SA residents any inducements (DSS, 2017).

The application of the current measure to all Australian jurisdictions follows from research linking wagering inducements to higher risk gambling behaviour, and from concerns in the O'Farrell review (2015) about the fragmented approach to restricting their use across Australian jurisdictions (Gainsbury, Delfabbro, King, & Hing, 2015; Hing, Cherney, Blaszczanski, Gainsbury, & Lubman, 2014; Hing, Lamont, Vitartas, & Fink, 2015; Hing, Sproston, Brading, & Brook, 2015; Hing, Sproston, Brook & Brading, 2016; Responsible Gambling Council, 2013). Box A1.1 lists common inducements.

## Box A1.1: Inducements

Inducements refer to financial incentives provided to people who wager or potential wagers to encourage the initial or continued use of a specific operator. These include:

- sign up offers (including free bets or matching of initial deposits)
- multi-bet offers
- deposit bonuses (including free bets or matching of additional deposits)
- payouts on certain losing bets (including protest or extra-time payouts)
- referral credits
- promotional odds (such as 'bonus' odds)
- promotional winnings (such as 'bonus' winnings)
- competitions offering bonus bets as prizes
- reduced commissions
- free bets
- cash rebates.

Source: O'Farrell (2015)

Inducements to wager are heavily promoted through traditional and, particularly, digital media, which faces fewer advertising restrictions (Sproston, Hanley, Brook, Hing, & Gainsbury, 2015). Many are reportedly designed to facilitate impulse betting and are conducive to continued and intensified wagering involvement – behaviours commonly identified as high-risk factors for gambling problems (Hing, Russell, Lamont, & Vitartas, 2017; Hing, Russell, Li, & Vitartas, 2018; Lopez-Gonzalez & Griffiths, 2017; Armstrong et al., 2018; Binde, 2011; MacLaren, 2016).

A review of gambling advertising concluded that inducements also hinder efforts to limit gambling and can trigger relapses in risky gambling behaviour patterns (Binde, 2014). The advertising and provision of such inducements by domestic providers runs contrary to the commitment to responsible gambling outlined on the front page of most providers' websites (Hing et al., 2016).

It is also common for people who bet online to actively seek out inducements to increase the value of their bets. Previous research has found that participants open accounts with multiple providers, increasing their exposure to inducements in the process. Young males who bet, in particular, are often targeted by advertising to encourage this behaviour (Hing, Lamont et al., 2015; Jenkinson et al., 2018).

A recent study of 722 people who bet regularly found frequent and ongoing exposure to inducements on a near daily basis (Hing, Russell, Thomas, & Jenkinson, 2019). It was suggested that although those who bet could opt out of receiving messages containing inducements, a desire to stay informed underlay their choice to remain opted in. Both race and sports bettors reported that inducements made it much more likely they would place more frequent and larger bets.

Sports betting inducements in particular are often marketed with a reduction in risks by providing full or partial refund of the stake (under certain conditions), or the opportunity to withdraw the bet before the outcome is guaranteed (Lopez-Gonzalez & Griffiths, 2017). However, recent research shows these marketing approaches to inducements are likely to lead consumers to overestimate



their attractiveness and underestimate their true cost (Hing, Browne et al., 2018), and to spend/lose more rather than less (Hing et al., 2019).

## Ready access to account closure or cancellation

The fifth measure requires that information regarding the process for customer-initiated account closure be included and clearly articulated within each customer's 'My Account' window (DSS, 2017, 2018). State and territory governments are expected to implement this measure by May 2019 (DSS, 2018).

The measure addresses the current lack of consistency across online wagering sites in account closure options for customers. Stakeholder consultations for the National Framework Regulation Impact Statement (RIS) heard concerns that some people who wagered experienced difficulties closing their online accounts, with some providers not closing customer accounts when requested to do so. Indeed, some people who bet described being offered inducements to keep their accounts open following closure requests. Others described sites where providers did not have account closure options. Instead, deactivation or suspension options were offered, with no return of funds. An administrative fee was charged to retain the funds attached to the deactivated account (DSS, 2017).

The absence of a transparent, simple and accessible process to close an account runs counter to responsible gambling practices for customers who may be at risk of harm or wish to cease gambling and have funds returned. A simple and clearly articulated mechanism for closing consumer accounts should be established.

## Provision of a voluntary opt-out pre-commitment scheme

The sixth measure requires online wagering providers to follow a standardised approach in the provision of a voluntary opt-out pre-commitment scheme for all customers (DSS, 2017). Each provider is required to offer consumers options to set binding limits on how much they can deposit into their online wagering account over a given time period. They are also required to review these limits at least yearly. State and territory governments are expected to implement this measure by May 2019. The feasibility of extending the scheme to a centralised system, where limits set with one provider would apply across all providers, is to be considered within three years (DSS, 2018).

The specific features of the standardised approach comprise the following (DSS, 2018):

- be easily accessible and effectively promoted to customers
- prompt a customer to set a limit during the account sign-up process
- mandate deposit limits, with other limits (e.g., spend limits) optional for operators
- limits to be binding
- interactive wagering service must not accept further deposits from a customer above the set deposit limit
- decreasing of limits to apply immediately, with a cooling-off period for limit increases being seven days
- all consumers to be prompted to set and review pre-commitment limits at regular intervals, possibly every year, including to consumers who have chosen not to set a limit (subject to testing)
- the prompt must occur at the time of the customer's next bet following each anniversary of the customer's first bet, except where the customer does not have an active betting account on that date

- the prompt must be made via the same channel being used by the customer for placing their bet at the time the prompt is due
- options to be available for the consumer to determine the time period for their limit, including daily, weekly, fortnightly and monthly
- limit setting and changes to deposit limits to be accessible via the same channels available to customers to place a bet, in addition to being able to set or change their deposit limit in writing
- availability of the scheme to be promoted beyond initial account sign-up, with education and awareness of the scheme shown on a provider's website and in promotional material.

The measure is intended to provide a nationally consistent approach at the single-operator level. Providers will still be able to offer additional limit-setting options in forms that they currently do, including various combinations of deposit limits, play limits, loss limits and bet limits. Over time, the voluntary opt-out pre-commitment element is anticipated to normalise monetary limit-setting behaviour for customers, reduce stigma, increase uptake, and in turn, reduce related harm.

## Box A1.2: Common limit-setting features

- **Deposit limits:** This refers to the maximum amount of money that an individual can deposit into their account at any given time. Winnings can either be included or excluded from this figure.
- **Play limits:** This refers to the maximum amount of money that an individual can gamble with at any given time. As with deposit limits, winnings can either be included or excluded from this figure.
- **Loss limits:** This refers to the maximum amount of money that an individual is able to lose at any one session.
- **Bet limits:** This refers to the maximum amount of money that can be bet on a single outcome/event, or on concurrent outcomes/events.

Source: Auer & Griffiths (2013)

Research suggests that a voluntary opt-out, deposit limit-setting measure will be well-received. Many people who gamble decide how much they are going to spend before commencing gambling (Blaszczynski, Parke, Parke, & Rigby, 2014; Wohl, Gainsbury, Stewart, & Sztainert, 2013). However, many also frequently spend more time and money than they initially intended (Monaghan & Blaszczynski, 2010a). A study of more than 10,000 who gamble online, from 96 different countries, found that most (70%) thought that voluntary spending limits would be a useful responsible gambling feature (International Gaming Research Unit, 2007).

Reviews have showed evidence of harm minimisation effectiveness for those who used pre-commitment features. These include reduced expenditure and participation, lower rates of problem gambling, and increased awareness of spending. However, some studies have reported decreases in average expenditure for moderate-risk and problem gamblers while other studies have reported no change. Setting limits under a voluntary system were found to have limited effectiveness where the individual was able to exit the system and/or continue gambling past set limits (Edgerton, Biegun, & Roberts, 2016; Harris & Griffiths, 2017; Livingstone et al., in press; Tanner, et al, 2017; Thomas, Carson et al., 2016).

In the case of the National Framework, wagering providers will be required to actively prompt consumers to use and review the limit-setting options, which is expected to improve usage and effectiveness of the system. It is also anticipated that in mandating consumers to make a conscious decision to set limits (i.e. an *opt-out* system), awareness and use of the measure will be greater (DSS, 2017).

An important consideration for the evaluation will be the impact of the requirement for customers to set limits for each account they hold with separate providers. As noted earlier, most people who wager online report having multiple active wagering accounts (Gainsbury, Russell, Blaszczynski, & Hing, 2015; Jenkinson et al., 2018). The burden on customers to set limits across all accounts and review each limit yearly may impact on the choice to opt-out, and also to set effective limits.

In some European Union countries, online verification data are used to assign each customer a unique code for use across all sites licensed within the jurisdiction, ensuring the limits set to wagering expenditure apply across all provider sites (European Union, 2014). The capacity for this system to reduce user fatigue and enhance tracking and impact of expenditure limits supports extending the single operator-level system to a centralised system, where limits set with one provider would apply across all. Australian governments are expected to consider the feasibility of an option like this within three years. In the meantime, a centralised limit-setting tool could complement the existing measure (DSS, 2018).

## Provision of meaningful wagering activity statements

The seventh measure requires that all online wagering operators provide standardised activity statements to customers, detailing wagering activity including winnings, losses and total amount wagered. The goal of activity statements is to provide information on spending to inform decisions about wagering behaviour and expenditure, and support prevention and minimisation of risky gambling.

Testing and trialling of different features by the Behavioural Economics Team of the Australian Government (BETA) will inform the final format and content of these statements (DSS, 2017). State and territory governments are expected to implement the agreed standards by May 2020, subject to the trialling and testing (DSS, 2018).

In the absence of specific requirements, the standardised approach is informed by the following high-level principles (DSS, 2018):

- Interactive wagering service providers must provide an activity statement at least once a year to every customer with an active betting account.
- Activity statements must provide clear and easily understandable information about each bet placed, the account balance, deposits and withdrawals, wins and losses, the net win/loss for a specified time and the date, time, and unique transaction identifier of each transaction.
- Activity statements must be accessible by a customer on request at any time either via email, telephone or online through their account.
- Activity statements must not be sent to inactive accounts; however, customers with an inactive account can still request their activity statements.
- Activity statements must be provided free of charge except where a customer elects for delivery by mail.
- Betting account transactions must also be readily available via a customer's account window or by email/post.
- At a minimum, customers should be able to access a record of their transactions for the preceding seven years.

Currently provision of wagering activity information and transaction histories is mandated within most Australian jurisdictions; however, the information provided is often inconsistent across jurisdictions and providers, and there is concern that the information is not presented in user-friendly ways. For example, the provision of long lists of transactions may prevent customers understanding their wagering expenditure, as it can be difficult to understand whether they are ahead or behind overall (DSS, 2017).

A key finding of the small number of studies on activity statements was that they appeared to prevent and curtail unplanned spending and encourage people at risk of gambling problems to confront their spending and may trigger behaviour changes including reducing expenditure and seeking help (Thomas, Carson et al., 2016).

Another study found that the regular activity statements were considered one of the most vital tools for self-regulating expenditure. Fifty online wagerers reported that they often lost track of their expenditure during sessions, with losses becoming apparent later when viewing bank statements (Hing, Gainsbury et al., 2014). The value of activity statements is further supported by comparisons between industry-reported expenditure data and consumer-reported data, which suggest that people significantly underestimate their gambling expenditure (Armstrong & Carroll, 2017a).

These findings suggest that wagering activity statements, on their own and in combination with other measures, may be of great value to customers. Statements and pre-commitment together can inform consumer decisions about appropriate loss limits, and track progress toward these limits. They will provide users with a record of expenditure, when a limit was set, at what level, and how often it was reached over a given time interval. It is anticipated that this will assist consumers to manage their wagering participation and provide greater overall protection (DSS, 2017).

## Provision of consistent gambling messaging

The eighth measure requires all online wagering operators to apply consistent gambling messaging (CGM) to assist responsible gambling efforts (DSS, 2018). It refers to the display of messages that aim to encourage people who gamble to become more aware of their gambling behaviours and decisions. The messaging is intended to be engaging to facilitate conscious decision-making among people who engage in online wagering, and to correct any misperceptions about their own gambling behaviour. The messaging will also aim to inform consumers about harmful gambling behaviours, remove stigma associated with consumer protection tools and gambling help services and encourage their uptake. This is intended to ensure that Australian consumers all receive the same responsible gambling information, with messages that encourage rational gambling choices and support self-appraisal (DSS, 2017).

Testing and trialling is still required to design CGM features that will be effective as a consumer protection measure, including message terminology, format, style, consistency and imagery. Subject to approval, CGMs are intended to be fully implemented by May 2020 (DSS, 2017, 2018).

In the absence of specific requirements, high-level principles have been recommended to be mandated in the National Framework to guide the CGM measure (DSS, 2018):

- The same approved gambling messages must be used in connection with any interactive wagering service.
- State and territory governments will be able to tailor the gambling messages to their own campaigns.

- The approved gambling messages will be designed in collaboration with experts, in consideration of the jurisdictions in which they will be displayed and in consideration of the messages being easily understood by the wide range of consumer groups who make up the intended audience.

Current regulations for the provision of CGMs are fragmented across states and territories. CGMs will reduce the regulatory burden for providers since they will only be required to adhere to a single set of regulations and to use the same messaging across Australia. However, there is a concern related to 'generic' messaging and the possibility that seeing the same messages repeatedly will result in CGMs being less effective (DSS, 2017).

The information provided by CGMs may relate to the benefits of sticking to limits, the odds of winning, and potential risks of gambling excessively. Informative messaging of similar content has frequently been used in educational campaigns and warning messages have been used across a range of public health initiatives (Monaghan & Blaszczynski, 2010a). Presenting customers with accurate information about products and behaviours diminishes erroneous cognitions and biases, and facilitates informed consumer choice (Monaghan & Blaszczynski, 2010b).

The CGMs may also include self-appraisal messages that directly encourage the customer to consider how much time and money they have spent gambling during the session. These messages may cause customers to evaluate their behaviour in a more personally relevant way than information around odds and risks would evoke, and may lead to more informed and considered decisions (Monaghan & Blaszczynski, 2010a).

## Provision of staff training in responsible service of online gambling

The ninth measure makes responsible conduct of gambling training mandatory for all staff employed by an Australian licensed online wagering provider who are either involved in the provision of online wagering services, or who have the capacity to influence the online wagering service (such as marketing and communications staff). The training program is to be nationally consistent, provided online through an accredited provider, and include an annual refresher component. The intention is to ensure that industry staff are educated in the responsible provision of gambling services in the context of online wagering environments (DSS, 2017). It is anticipated that the program will be delivered within 18 months of commencement of the National Framework (DSS, 2018).

Features of the mandatory training program include (DSS, 2018):

- All staff involved in the provision of wagering services, or with the capacity to influence the wagering service, must undertake responsible service of gambling training.
- An online training program must be undertaken by new staff within one month of commencing work but before interacting with a customer and by existing staff within six months of the online training program coming into effect.
- All staff who have undertaken the approved online training program must undertake an annual refresher training course.
- The approved online training program (including refresher training course) must be industry funded.

Currently, regulations are fragmented and inconsistent across Australian jurisdictions with regard to training requirements for staff involved in online wagering. States and territories generally establish codes of practice that require wagering providers to provide their online wagering staff with responsible gambling training.

Staff Responsible Service of Gambling (RSG) training is of high importance to consumer protection efforts and should be an integral aspect of industry practice. It is required to help employees recognise and assist customers who may be experiencing gambling-related difficulties (O'Farrell, 2015). However, the majority of RSG staff training programs have not been tested empirically (Wood, Shorter, & Griffiths, 2014).

There is some evidence to suggest that staff training can increase understanding and identification of gambling problems, and provide the basic skills to intervene with those gambling excessively (Ladoucer et al., 2004; Dufour, Ladoucer, & Giroux, 2010; Quilty, Robinson, & Blaszczynski, 2015). However, research conducted in land-based venues suggest that a highly cautionary approach is often taken to staff intervention, with approaches only following the observation of problem gambling behaviours well in excess of the number or severity necessary to be highly confident that the customer is in trouble (Delfabbro, Thomas, & Armstrong, 2016; Rintoul, Deblaire, & Thomas, 2017).

This measure requires further research to inform the development of an effective staff training program for harm minimisation in the online wagering environment (DSS, 2017). Developing indicators of risk behaviours in the online environment where customers are not 'visible' will be necessary.

## National Self-Exclusion Register

The final measure introduces a centralised National Self-Exclusion Register (NSER). Customers will have the ability to electronically exclude across all licensed Australian online wagering providers through the NSER platform (DSS, 2017). The NSER is anticipated to be implemented 18 months from commencement of the Framework, subject to enactment of legislation and trialling and testing (DSS, 2018).

In terms of features, the NSER will (DSS, 2018):

- be industry-funded
- apply across all online wagering providers
- be quick and simple to apply for and take immediate effect upon registration/ sign-up
- be effectively promoted so consumers are educated about self-exclusion and aware of the register
- be offered across all phone and web-based digital platforms
- have consumer choice regarding the length of the exclusion period, ranging from three months to permanent exclusion
- allow individuals to nominate a sponsor who will be notified at the end of the exclusion period
- have information on gambling support services, financial services and counselling at the point in time a consumer nominates to self-exclude, including information about land-based self-exclusion tools
- make information on gambling consumer protections publicly available and accessible
- prohibit online wagering service providers from providing any marketing or promotional material during the period of self-exclusion
- ensure that all funds held in active accounts will be returned to the excluded customer once all wagers/bets are settled, and then that account will be closed
- provide a process for revocation of self-exclusion, with evidence that the consumer has seen a counsellor, and a further seven-day cooling-off period

- ensure that customers are required to actively approach online wagering service providers to reactivate a wagering account
- have the capability to also exclude customers on the basis of an interactive wagering service/product.

In the O'Farrell review (2015), the existing regulatory framework for self-exclusion (SE) was considered fragmented and weak. In most jurisdictions, consumers have been required to self-exclude from all providers individually. Only the Northern Territory offers SE across multiple operators, and some jurisdictions do not mandate for self-exclusion at all. Most self-exclusions are performed through a paper-based process.

Research reviews that considered SE found only a limited number of studies investigating the effectiveness of SE programs or comparing their elements and implementation (Thomas et al., 2016; Dawson, Tanner, Mushquash, Mushquash, & Mazmanian, 2017). Most of the reviews concluded that there was some evidence of the effectiveness of SE schemes: study findings included reports of reductions in gambling involvement (Hing, Russell, Tolchard, & Nuske, 2015), expenditure (Xuan & Shaffer, 2009) risk behaviour (Ladouceur, Sylvain, & Gosselin, 2007), and improvements in wellbeing (Tremblay, Boutin, & Ladouceur, 2008).

Both stigma and the processes attached to current SE measures were identified by studies as deterrents to their use in land-based settings (Thomas, Carson et al., 2016; Livingstone et al., in press). This included customer embarrassment (e.g. Blaszczyński et al., 2014), confidence in staff ability to maintain confidentiality, the time it took to exclude and for it to take effect (e.g. Hing, Gainsbury et al., 2014) and the rigidity of SE programs (Gainsbury, 2014).

The centralised NSER for online wagering is expected to address these issues by providing a timely 'one-stop shop' for exclusion, in an online neutral space managed by an independent third party, with consumer flexibility and choice around the exclusion period (DSS, 2017).

## Literature review references

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006.
- Armstrong, A., & Carroll, M. (2017a). *Gambling activity in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Armstrong, A. R., & Carroll, M. (2017b). *Sports betting in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Armstrong, A., & Carroll, M. (2017c). *Race betting in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
- Armstrong, A., Thomas, A., & Abbott, M. (2018). Gambling participation, expenditure and risk of harm in Australia, 1997–98 and 2010–11. *Journal of Gambling Studies*, 34(1), 255–274.
- Auer, M., & Griffiths, M. D. (2013). Voluntary limit setting and player choice in most intense online gamblers: An empirical study of gambling behaviour. *Journal of Gambling Studies*, 29(4), 647–660.
- Australian Communications Media Authority (ACMA). (2018). *Register of licensed interactive wagering services*. Sydney: ACMA. Retrieved from [www.acma.gov.au/theACMA/register-of-licensed-interactive-wagering-services](http://www.acma.gov.au/theACMA/register-of-licensed-interactive-wagering-services)
- Blaszczyński, A., & Hunt, C. (2011). *Online sports betting has created new generation of problem gamblers*. Sydney: The University of Sydney. Retrieved from [sydney.edu.au/news/84.html?newsstoryid=6545](http://sydney.edu.au/news/84.html?newsstoryid=6545)
- Blaszczyński, A., Parke, A., Parke, J., & Rigby, J. (2014). *Operator-Based Approaches to Harm Minimisation in Gambling: Summary, Review and Future Directions*. London: Responsible Gambling Trust.
- Binde, P. (2011). *What are the most harmful forms of gambling? Analyzing problem gambling prevalence surveys*. CEFOS working paper 12.
- Binde, P. (2014). *Gambling advertising: A critical research review*. London: Responsible Gambling Trust.

- Brosowski, T., Meyer, G., & Hayer, T. (2012). Analyses of multiple types of online gambling within one provider: An extended evaluation Framework of actual online gambling behaviour. *International Gambling Studies*, 12(3), 405–419.
- Browne, M., Langham, E., Rawat, V., Greer, N., Li, E., Rose, J. et al. (2016). *Assessing gambling-related harm in Victoria: A public health perspective*. Melbourne: Victorian Responsible Gambling Foundation.
- Browne, M., Greer, N., Armstrong, T., Doran, C., Kinchin, I., Langham, E & Rockloff, M (2017). *The social cost of gambling to Victoria*. Melbourne: Victorian Responsible Gambling Foundation.
- Communio. (2018). *Performance, Review and Evaluation Strategy (PRES) and cost options for the National Consumer Protection Framework (NCPF) for online wagering in Australia*. Report to the Department of Social Services, Gambling Policy Section, Welfare Quarantining and Gambling Branch. Confidential report.
- Delfabbro, P., Thomas, A., & Armstrong, A. (2016). Observable indicators and behaviors for the identification of problem gamblers in venue environments. *Journal of Behavioral Addictions*, 5, 419–428.
- Department of Social Services (DSS). (2017). *A national consumer protection Framework for online wagering in Australia: Decision regulation impact statement*. Canberra: DSS.
- Department of Social Services. (2018). *National consumer protection Framework for online wagering in Australia: National policy statement*. Canberra: DSS.
- Department of Trade, Business and Innovation. (2016). *NT Code of practice for responsible online gambling*. Darwin: Northern Territory Government.
- Drawson, A. S., Tanner, J., Mushquash, C. J., Mushquash, A. R., & Mazmanian, D. (2017). The use of protective behavioural strategies in gambling: a systematic review. *International Journal of Mental Health and Addiction*, 15(6), 1302–1319
- Dufour, J., Ladouceur, R., & Giroux, I. (2010). Training program on responsible gambling among video lottery employees. *International Gambling Studies*, 10(1), 61-79.
- Edgerton, J. D., Biegun, J., & Roberts, L. W. (2016). Player behavioral tracking and personalized feedback in online gambling: Implications for prevention and treatment of problem gambling. *Journal of Addiction Prevention*, 4, 1–8.
- European Union. (2014). *Study on the role of regulators for online gambling: authorisation, supervision and enforcement. Final study report*. Doi: 10.2780/30455.
- Ferris, J. A., & Wynne, H. J. (2001). *The Canadian problem gambling index* (pp. 1–59). Ottawa, ON: Canadian Centre on Substance Abuse.
- Financial Counselling Australia. (2015). *Duds, Mugs and the A-List: The Impact of Uncontrolled Sports Betting*. South Brisbane: Financial Counselling Australia.
- Financial Counselling Australia. (2016). *Problem Gambling*. South Brisbane: Financial Counselling Australia.
- Gainsbury, S. M. (2012). *Internet Gambling: Current Research Findings and Implications*. Berlin: Springer Science & Business Media.
- Gainsbury, S. M., Delfabbro, P. H., King, D. L., & Hing, N. (2015). An exploratory study of gambling operators' use of social media and the latent messages conveyed. *Journal of Gambling Studies*. doi: 10.1007/s10899-015-9525-2
- Gainsbury, S., Russell, A., Blaszczynski, A., & Hing, N. (2015). Greater involvement and diversity of Internet gambling as a risk factor for problem gambling. *European Journal of Public Health*. doi: 10.1093/eurpub/ckv006.
- Gainsbury, S., Russell, A., Hing, N. & Blaszczynski, A. (2018). Consumer engagement with and perceptions of offshore online gambling sites. *New Media and Society*, 20(8), 2990–3010.
- Gainsbury, S. M., Russell, A., Hing, N., Wood, R., Lubman, D., & Blaszczynski, A. (2015). How the Internet is changing gambling: findings from an Australian prevalence survey. *Journal of Gambling Studies*, 31, 1–15.
- Global Betting and Gaming Consultants (GBGC). (2018). *Interactive Gambling Dataset 2018*. Isle of Man: GBGC.
- Goodwin, B., Browne, M., Rockloff, M., & Rose, J. (2017). A typical problem gambler affects six others, *International Gambling Studies*, 17:2, 276-289, DOI:10.1080/14459795.2017.1331252
- Harris, A. & Griffiths, M. D. (2017). A critical review of the harm-minimisation tools available for electronic gambling. *Journal of Gambling Studies*, 33, 187–221.
- Hing, N., Browne, M., Russell, A., Greer, N., Thomas, A., Jenkinson, R. & Rockloff, M. (2018). Where's the bonus in bonus bets? Assessing sports bettors comprehension of their true cost. *Journal of Gambling Studies*, doi: 10.1007/s10899-018-9800-0.

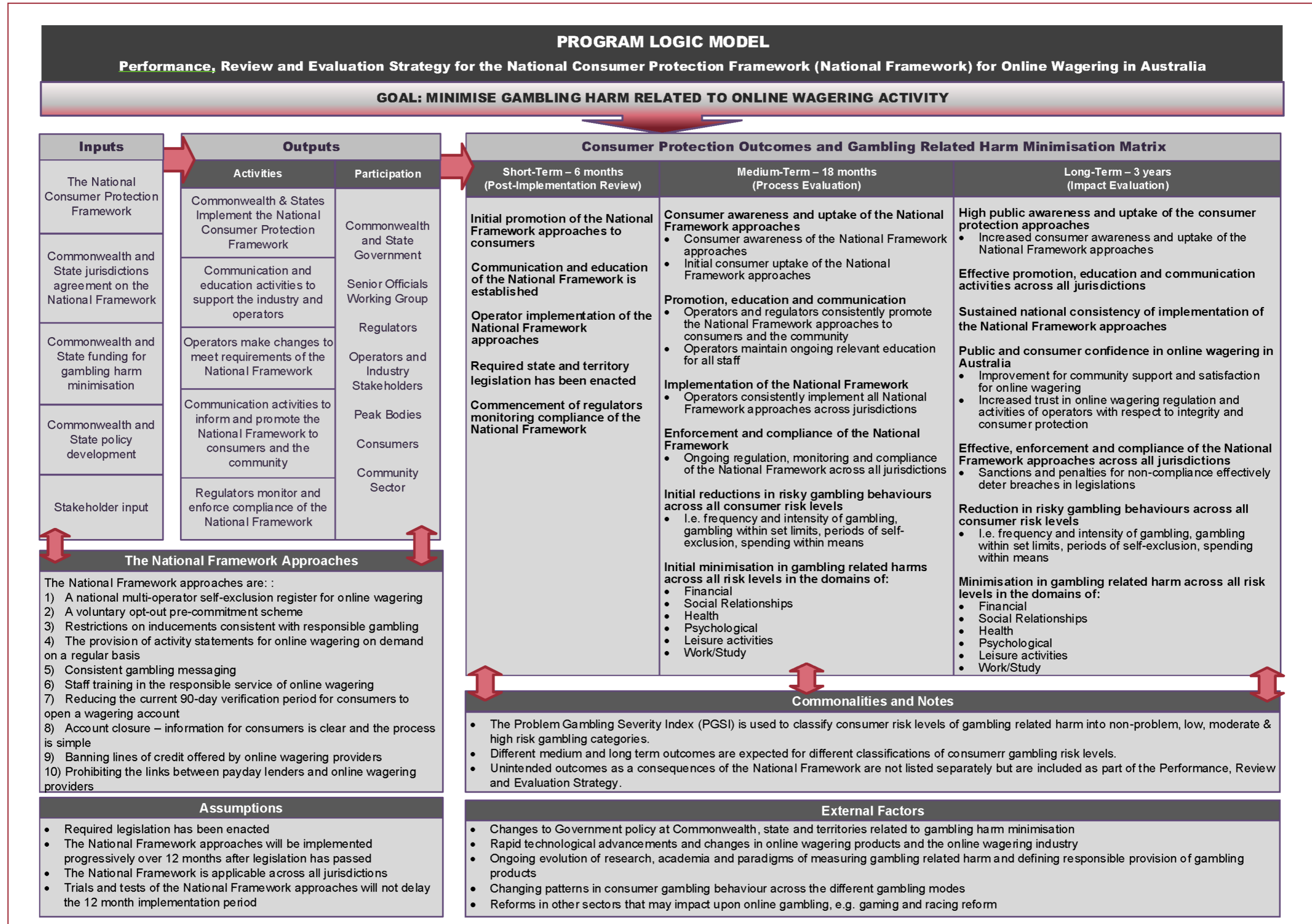


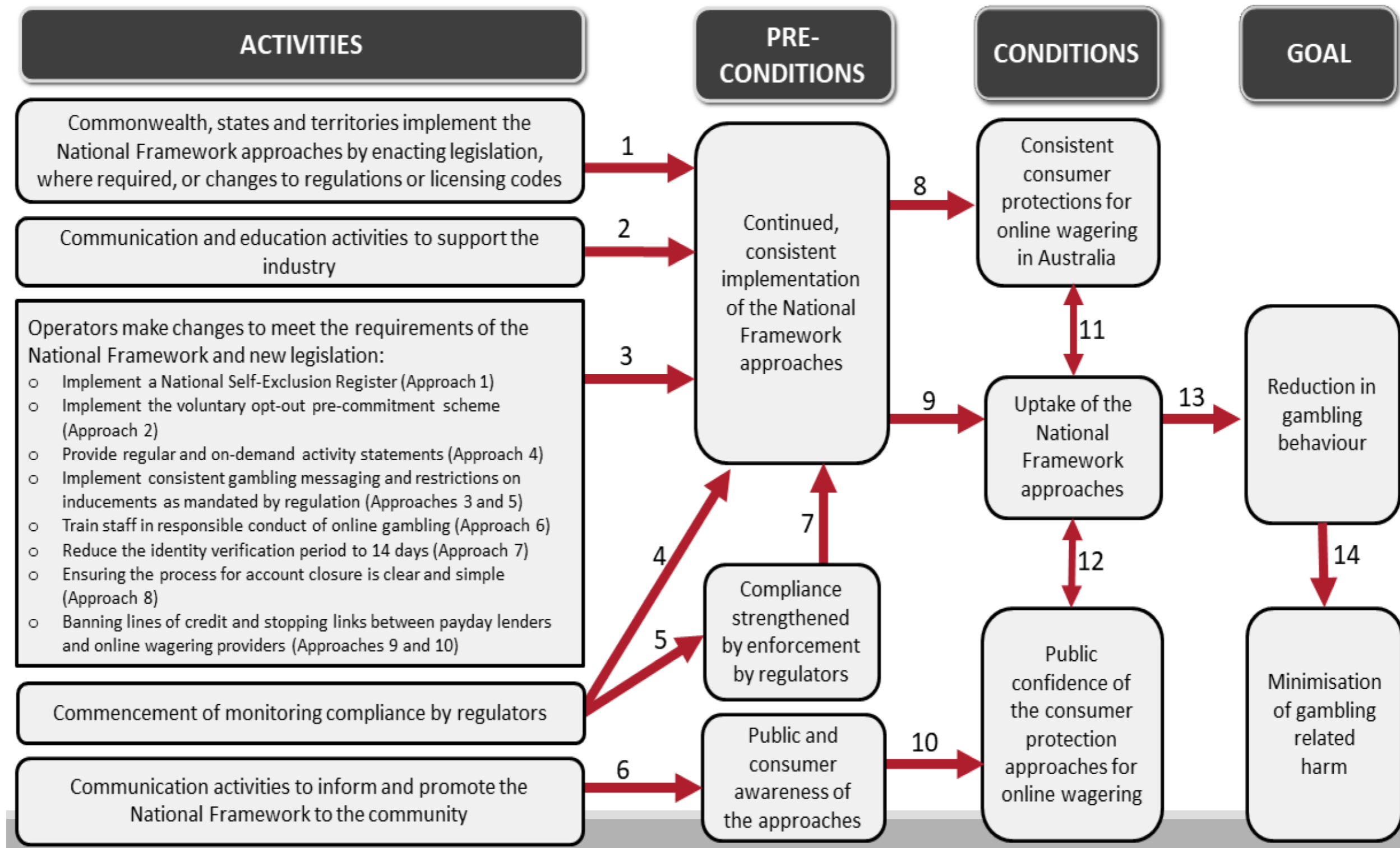
- Hing, N., Cherney, L., Blaszczynski, A., Gainsbury, S., & Lubman, D. (2014). Do advertising and promotions for online gambling increase gambling consumption? An exploratory study. *International Gambling Studies*, 14(3), 394–409.
- Hing, N., Gainsbury, S., Blaszczynski, A., Wood, R., Lubman, D., & Russell, A. (2014). *Interactive Gambling*. Melbourne, Australia: Gambling Research Australia.
- Hing, N., Lamont, M., Vitartas, P., & Fink, E. (2015a). Sports-embedded gambling promotions: A study of exposure, sports betting intention and problem gambling amongst adults. *International Journal of Mental Health and Addiction*, 13(1), 115–135.
- Hing, N., Russell, A. M. T., Lamont, M., & Vitartas, P. (2017). Bet anywhere, anytime: An analysis of Internet sports bettors' responses to gambling promotions during sports broadcasts by problem gambling severity. *Journal of Gambling Studies*, 33, 1051–1065.
- Hing, N., Russell, A. M., Li, E., & Vitartas, P. (2018). Does the uptake of wagering inducements predict impulse betting on sport? *Journal of Behavioural Addictions*, 7(1), 146–147.
- Hing, N., Russell, A., Thomas, A., & Jenkinson, R. (2019). Wagering advertisements and inducements: Exposure and perceived influence on betting behaviour. *Journal of Gambling Studies*, doi: 10.1007/s10899-018-09823-y.
- Hing, N., Russell, A., Tolchard, B., & Nuske E. (2015b). Are there distinctive outcomes from self-exclusion? An exploratory study comparing gamblers who have self-excluded, received counselling, or both. *International Journal of Mental Health and Addiction*, 13, 481–496.
- Hing, N., Sproston, K., Brading, R., & Brook, K. (2015c). *Review and analysis of sports and race betting inducements*. Melbourne: Victorian Responsible Gambling Foundation.
- Hing, N., Sproston, K., Brook, K., & Brading, R. (2016). The Structural Features of Sports and Race Betting Inducements: Issues for Harm Minimisation and Consumer Protection. *Journal of Gambling Studies*, 1–20.
- International Gaming Research Unit. (2007). *The global online gambling report: An exploratory investigation into the attitudes and behaviours of internet casino and poker players*. Report for eCOGRA (e-Commerce and Online Gaming Regulation and Assurance).
- Jenkinson, R., de Lacey-Vawdon, C., & Carroll, M. (2018). *Weighing up the odds: Young men, sports and betting*. Melbourne: Victorian Responsible Gambling Foundation.
- Ladouceur, R., Boutin, C., Doucet, C., Dumont, M., Provencher, M., Giroux, I., & Boucher, C. (2004). Awareness promotion about excessive gambling among video lottery retailers. *Journal of Gambling Studies*, 20(2), 181-185.
- Ladouceur, R., Sylvain, C., & Gosselin, P. (2007). Self-exclusion program: A longitudinal evaluation study. *Journal of Gambling Studies*, 23, 85–94.
- LaPlante, D. A., Nelson, S. E., & Gray, H. M. (2014). Breadth and depth involvement: Understanding Internet gambling involvement and its relationship to gambling problems. *Psychology of Addictive Behaviors*, 28(2), 396–403.
- Livingstone, C., Rintoul, A., de Lacey-Vawdon, C., Borland, R., Dietze, P., Jenkinson, R., Livingston, M., et al. (in press) *Identifying effective policy interventions to prevent gambling-related harm*. Melbourne: Victorian Responsible Gambling Foundation.
- Lopez-Gonzalez, H., & Griffiths, M. D. (2017). 'Cashing out' in sports betting: Implications for problem gambling and regulation. *Gaming Law Review*, 21(4), 323–326.
- MacLaren, V. V. (2016). Video lottery is the most harmful form of gambling in Canada. *Journal of Gambling Studies*, 32, 459–485.
- Monaghan, S., & Blaszczynski, A. (2010a). Electronic gaming machine warning messages: Information versus self-evaluation. *Journal of Psychology*, 144(1), 83–96.
- Monaghan, S., & Blaszczynski, A. (2010b). Impact of mode of display and message content of responsible gambling signs for electronic gaming machines on regular gamblers. *Journal of Gambling Studies*, 26, 67–88.
- Moore, S. M., Thomas, A. C., Kyrios, M., & Bates, G. (2012). The self-regulation of gambling. *Journal of Gambling Studies*, 28, 405–420.
- O'Farrell, B. (2015). *Review of illegal offshore wagering. Report to the Ministers for Social Services and the Minister for Communications and the Arts*. Canberra: Commonwealth of Australia, Department of Social Services.
- Productivity Commission. (2010). *Gambling Productivity Commission inquiry report* (Report no. 50). Canberra: Productivity Commission.
- Queensland Government Statistician's Office (QGSO), Queensland Treasury. (2018). *Australian Gambling Statistics*, 34th edition. Brisbane: Queensland Government Statistician's Office.
- Quilty, L. C., Robinson, J., & Blaszczynski, A. (2015). Responsible gambling training in Ontario casinos: Employee attitudes and experience. *International Gambling Studies*, 15, 361–376.

- Responsible Gambling Council (RGC). (2013). *Responsible gambling best practices for player incentives: Land-based venues*. Toronto: Responsible Gambling Council.
- Rintoul, A., & Deblaquiere, J. (2017). Responsible gambling codes of conduct: lack of harm minimisation intervention in the context of venue self-regulation. *Addiction Research & Theory*, 1–11.
- Rintoul, A., & Deblaquiere, J. (2019). *Gambling in Suburban Australia*. Melbourne: Australian Institute of Family Studies.
- Rodda, S. N., Bagot, K., Cheetham, A., Hodgins, D. C., Hing, N., & Lubman, D. I. (2018). Types of change strategies for limiting or reducing gambling behaviours and their perceived helpfulness: A factor analysis. *Psychology of Addictive Behaviors*, 32(6), 679–688.
- Rodda, S. N., Dowling, N. A., & Lubman, D. I. (2018). Gamblers seeking online help are active help-seekers: Time to support autonomy and competence. *Addictive Behaviors*. Advance online publication. doi:10.1016/j.addbeh.2018.06.001
- Roy Morgan. (2018a). *Australian betting market dominated by racing*. Melbourne: Roy Morgan.
- Roy Morgan. (2018b). *Mobile betting drives growth in online wagering*. Melbourne: Roy Morgan.
- Sproston, K., Hanley, C., Brook, K., Hing, N., & Gainsbury, S. (2015). *Marketing of sports betting and racing*. Melbourne: Gambling Research Australia.
- Tanner, J., Dawson, A., Mushquash, C., Mushquash, A., & Mazmanian, D. (2017). Harm reduction in gambling: A systematic review of industry strategies. *Addiction Research & Theory*, 25(6), 485–494. doi: 10.1080/16066359.2017.1310204
- Thomas, A., Carson, R., Deblaquiere, J., Armstrong, A., Moore, S., Christensen, D., & Rintoul, A. (2016). *Review of electronic gaming machine pre-commitment features: Self-exclusion*. Melbourne: Australian Institute of Family Studies.
- Tremblay N, Boutin C, & Ladouceur R. (2008). Improved self-exclusion program: preliminary results. *Journal of Gambling Studies*, 24, 505–518.
- Wardle, H., Moody, A., Spence, S., Orford, J., Volberg, R., & Jotangia, D. et al. (2011). *British gambling prevalence survey 2010* London: National Centre for Social Research.
- Williams, R.J., West, B.L., & Simpson, R.I. (2012). *Prevention of Problem Gambling: A Comprehensive Review of the Evidence, and Identified Best Practices*. Report prepared for the Ontario Problem Gambling Research Centre and the Ontario Ministry of Health and Long Term Care. Guelph: Ontario Problem Gambling Research Centre.
- Wohl, M. J., Gainsbury, S., Stewart, M. J., & Sztainert, T. (2013). Facilitating responsible gambling: The relative effectiveness of education-based animation and monetary limit setting pop-up messages among electronic gaming machine players. *Journal of Gambling Studies*, 29(4), 703–717.
- Wood, R. T., Shorter, G. W., & Griffiths, M. D. (2014). Rating the suitability of responsible gambling features for specific game types: A resource for optimizing responsible gambling strategy. *International Journal of Mental Health and Addiction*, 12, 94–112.
- Xuan Z, Shaffer, H. J. (2009). How do gamblers end gambling: longitudinal analysis of Internet gambling behaviors prior to account closure due to gambling related problems. *Journal of Gambling Studies*, 25, 239–252.

# Appendix 2: Program logic and theory of change

Source: Communio, 2018; page 19





Source: Communio, 2018, page 28

# Appendix 3: Explanatory Statements: Key stakeholders

## National Consumer Protection Framework for Online Wagering Baseline Study

### Information sheet for interviews with regulators

Principal researchers: Rebecca Jenkinson, Julie Deblaquiere, Uma Jatkar

#### About the study

A National Consumer Protection Framework for online wagering has been developed and agreed to by Australia's Commonwealth and state and territory-based governments. The objective of the Framework is to minimise harm related to online wagering activity, with ten consumer protection measures to be implemented.

The Framework is intended to deliver a nationally consistent set of agreed minimum consumer protection measures that apply to interactive/online wagering service providers across Australia. The roll-out, implementation and monitoring of the Framework will commence in 2019.

#### We would like to hear your perspectives

We'd like to interview a sample of Australian online wagering regulators before the Framework is implemented and rolled out across all jurisdictions. We will also be interviewing a selection of Australian based online wagering service providers.

The findings will provide a baseline measure of online wagering regulator and service provider awareness and understanding of the Framework, readiness for implementation, and perceived opportunities and challenges.

#### How you can participate

You can participate by taking part in a telephone interview. You are eligible to take part in an interview if you represent an Australian regulator.

#### The interview

The interview will be a fairly informal chat over the telephone with one of our researchers at a time that suits you. We will be interested in hearing about:

- your awareness and understanding of the Framework and your role in implementing or regulating it,
- your views on any existing consumer protection measures for online wagering (including their effectiveness and whether you see any changes to these with the roll-out and implementation of the Framework), and
- your views on any opportunities and challenges that may lay ahead with the roll-out of the Framework or the specific measures that have been proposed.

We expect the interview will last around 30 minutes. Your participation is voluntary, and you may choose to stop participating at any time or skip any questions you don't want to answer. If you decide after the interview that you no longer want to take part, you can request we remove any information you have provided.

## **Your privacy**

Your privacy is really important to us and we will protect the confidentiality of your responses to the fullest possible extent, within the limits of the law. With your permission, we will record and transcribe this interview. Any quotes or accounts (given in the context of your participation) will be used anonymously, or attributed to you under a pseudonym (i.e., a false name). The transcripts will be stored securely for a minimum of seven years in accordance with the National Health and Medical Research Council (NHMRC) research guidelines. The recordings will be destroyed by secure means once processed. All files will be stored on a highly secure Commonwealth government server.

The findings from our interviews with regulators and service providers will be used as part of a larger project to evaluate the implementation of the National Framework over the next five years. The results of this project will appear in a project report, and may appear in presentations at conferences and in journal articles, but as broad themes and grouped data only (i.e., no individual responses or specific cases will be identifiable). If you have any specific state/territory or organisational questions or concerns, we can refer you to the Framework Governance Committee for assistance.

## **Funding and ethics**

The Australian Gambling Research Centre at the Australian Institute of Family Studies is conducting the study on behalf of the Gambling Policy Section, Commonwealth Department of Social Services. The study has received ethics approval from the Australian Institute of Family Studies Human Research Ethics Committee (2018/12). If you would like to make a complaint about this research, please contact the Australian Institute of Family Studies' ethics secretariat via telephone (03) 9214 7888 or email [ethics-secretariat@aifs.gov.au](mailto:ethics-secretariat@aifs.gov.au)

## **Contact for further information and how you can take part**

If you would like further information about the project or are interested in taking part in an interview, please contact the Principal Researcher Dr Rebecca Jenkinson on (03) 9214 7864 or [Rebecca.Jenkinson@aifs.gov.au](mailto:Rebecca.Jenkinson@aifs.gov.au)

## **About the Australian Gambling Research Centre**

The Australian Gambling Research Centre (AGRC) was established under the National Gambling Reform Act 2012 at the Australian Institute of Family Studies (AIFS). AIFS is an independent statutory authority established by the Commonwealth Government in 1980 to undertake research into families and their wellbeing in Australia. The AGRC aims to provide high-quality, evidence-based publications and resources to increase the capacity and capability of policy-makers, researchers and professionals working in the area of gambling. More detailed information can be obtained from our websites: [www.aifs.gov.au/agrc](http://www.aifs.gov.au/agrc) and [www.aifs.gov.au](http://www.aifs.gov.au).

## **National Consumer Protection Framework for Online Wagering Baseline Study Information sheet for interviews with online wagering providers**

Principal researchers: Rebecca Jenkinson, Julie Deblaquiere, Uma Jatkar

### **About the study**

A National Consumer Protection Framework for online wagering has been developed and agreed to by Australia's Commonwealth and state and territory-based governments. The objective of the Framework is to minimise harm related to online wagering activity, with ten consumer protection measures to be implemented.

The Framework is intended to deliver a nationally consistent set of agreed minimum consumer protection measures that apply to interactive/online wagering service providers across Australia. The roll-out, implementation and monitoring of the Framework will commence in 2019.

### **We would like to hear your perspectives**

We'd like to interview a sample of Australian-based online wagering service providers before the Framework is implemented and rolled out across all jurisdictions. We will also be interviewing online wagering regulators in Australia.

The findings will provide a baseline measure of online wagering service provider and regulator awareness and understanding of the Framework, readiness for implementation, and perceived opportunities and challenges.

### **How you can participate**

You can participate by taking part in a telephone interview. You are eligible to take part in an interview if you represent an Australian-based online wagering service provider.

### **The interview**

The interview will be a fairly informal chat over the telephone with one of our researchers at a time that suits you. We will be interested in hearing about:

- your awareness and understanding of the Framework and company's role in implementing it,
- your views on any existing consumer protection measures for online wagering (including their effectiveness and whether you see any changes to these with the roll-out and implementation of the Framework), and
- your views on any opportunities and challenges that may lay ahead with the roll-out of the Framework or the specific measures that have been proposed.

We expect the interview will last around 30 minutes. Your participation is voluntary, and you may choose to stop participating at any time or skip any questions you don't want to answer. If you decide after the interview that you no longer want to take part, you can request we remove any information you have provided.

### **Your privacy**

Your privacy is really important to us and we will protect the confidentiality of your responses to the fullest possible extent, within the limits of the law. With your permission, we will record and transcribe this interview. Any quotes or accounts (given in the context of your participation) will be used anonymously, or attributed to you under a pseudonym (i.e., a false name). The transcripts will be stored securely for a minimum of seven years in accordance with the National

Health and Medical Research Council (NHMRC) research guidelines. The recordings will be destroyed by secure means once processed. All files will be stored on a highly secure Commonwealth government server.

The findings from our interviews with regulators and service providers will be used as part of a larger project to evaluate the implementation of the National Framework over the next five years. The results of this project will appear in a project report, and may appear in presentations at conferences and in journal articles, but as broad themes and grouped data only (i.e., no individual responses or specific cases will be identifiable). If you have any specific state/territory or organisational questions or concerns, we can refer you to the Framework Governance Committee for assistance.

### **Funding and ethics**

The Australian Gambling Research Centre at the Australian Institute of Family Studies is conducting the study on behalf of the Gambling Policy Section, Commonwealth Department of Social Services. The study has received ethics approval from the Australian Institute of Family Studies Human Research Ethics Committee (2018/12). If you would like to make a complaint about this research, please contact the Australian Institute of Family Studies' ethics secretariat via telephone (03) 9214 7888 or email [ethics-secretariat@aifs.gov.au](mailto:ethics-secretariat@aifs.gov.au)

### **Contact for further information and how you can take part**

If you would like further information about the project or are interested in taking part in an interview, please contact the Principal Researcher Dr Rebecca Jenkinson on (03) 9214 7864 or [Rebecca.Jenkinson@aifs.gov.au](mailto:Rebecca.Jenkinson@aifs.gov.au)

### **About the Australian Gambling Research Centre**

The Australian Gambling Research Centre (AGRC) was established under the National Gambling Reform Act 2012 at the Australian Institute of Family Studies (AIFS). AIFS is an independent statutory authority established by the Commonwealth Government in 1980 to undertake research into families and their wellbeing in Australia. The AGRC aims to provide high-quality, evidence-based publications and resources to increase the capacity and capability of policy-makers, researchers and professionals working in the area of gambling. More detailed information can be obtained from our websites: [www.aifs.gov.au/agrc](http://www.aifs.gov.au/agrc) and [www.aifs.gov.au](http://www.aifs.gov.au).



# Appendix 4: Online consumer survey



Australian  
Gambling  
Research  
Centre



--	--	--	--	--

Survey # (office use only)

## Online wagering and use of consumer protection features

Principal Researchers: Rebecca Jenkinson, Julie Deblaquiere, Uma Jatka

### Survey Information Sheet

#### *About the survey*

The survey aims to understand the **relationship between your online sports and race betting participation, and your awareness and use of online consumer protection features**. The survey is part of a larger project that aims to evaluate online wagering consumer protection measures.

#### **This is a short, confidential survey that will ask you about:**

- Your betting on sports, racing or other events,
- Your motivations to bet, and
- Your awareness, use and views on the consumer protection features available through online wagering sites.

**The survey should take about 15 minutes.** Participating in this survey is voluntary and you may choose to stop participating at any time. Your time is valuable. To thank people for their time, we will award **\$200 gift vouchers to five** randomly selected participants. These vouchers will be allocated in mid 2019.

Participating in this survey is voluntary and you may choose to stop participating at any time.

#### *Your privacy*

Survey responses are confidential and anonymous and your privacy is really important to us. If you choose to provide contact details to go in the voucher draw, your contact information will be kept in a separate password-protected database to maintain your confidentiality. This personal information will not be shared with anyone else and will be securely deleted once the draw is completed. If you express a wish to withdraw from participation in the survey after you press submit at the end of the survey, and before identifying information is removed, all data relating to you will be securely destroyed.

The de-identified survey data will be stored securely for a minimum of seven years in accordance with the National Health and Medical Research Council (NHMRC) research guidelines. All files will be stored on a highly secured Commonwealth government server. The de-identified data will be used as part of a larger project to evaluate online wagering consumer protection measures over the next five years. The results of this project will appear in a project report, and may appear in presentations at conferences and in journal articles, but as grouped data only (no individual responses will be identifiable).

#### *Funding and ethics*

The Australian Gambling Research Centre at the Australian Institute of Family Studies is conducting the study on behalf of the Commonwealth Department of Social Services. Roy Morgan Research is our fieldwork partner. The study has received ethics approval from the Australian Institute of Family Studies Human Research Ethics Committee (2018/12). If you would like to make a complaint about this research, please contact the Australian Institute of Family Studies' ethics secretariat via telephone (03) 9214 7888 or email [ethics-secretariat@aifs.gov.au](mailto:ethics-secretariat@aifs.gov.au)

#### *Contact for further information*

If you would like further information about the project, please contact the Principal Researcher Dr Rebecca Jenkinson on (03) 9214 7864 or [Rebecca.Jenkinson@aifs.gov.au](mailto:Rebecca.Jenkinson@aifs.gov.au)



Australian  
Gambling  
Research  
Centre



More detailed information about the AGRC can be found on our website: <https://www.aifs.gov.au/agrc>

A summary of the survey results will be accessible via the Australian Institute of Family Studies website at the completion of the project. When we report the results, we will only ever use anonymised, summarised group data.

#### *Support services*

If you would like to talk to someone for support with your gambling or other personal issues, please call the following support services for help.

Each of these services are available 24 hours a day, 7 days a week.

- Gambling Help Online 1800 858 858  
<https://www.gamblinghelponline.org.au>  
This is a dedicated support service for people who gamble, their families and friends.
- Lifeline 13 11 14  
This is a service that provides immediate crisis support and is open to all people.

If you would like any more information about this project or Roy Morgan Research, you can phone us on 1800 337 332

## PLEASE NOTE

- ?** Throughout this survey 'placing bets' refers to betting formally with money, e.g. with a bookie or wagering operator. This can include placing bets using apps or websites, telephone calls, or through staff or terminals at venues such as a pub/club/hotel. When we refer to online betting, we mean electronically via a mobile/smartphone, computer (e.g. PC, laptop), tablet (e.g. iPad), smart TV, internet telephone or by making a telephone call (not using the internet).



Australian  
Gambling  
Research  
Centre



## Section A - Screening Questions

### A1. In the last 12 months, have you placed any bets online (with money) on sports, racing or other events?

**?** When we refer to online betting, we mean electronically via a mobile/smartphone, computer (e.g. PC, laptop), tablet (e.g. iPad), smart TV, internet telephone or by telephone call.

(Mark  one box only)

Yes

No  ▶ **Terminate**

Can't say  ▶ **Terminate**

### A2. Are you aged 18 years or over?

(Mark  one box only)

Yes

No  ▶ **Terminate**

Prefer not to say  ▶ **Terminate**

### A3. What is your gender?

(Mark  one box only)

Male

Female

Other



Australian  
Gambling  
Research  
Centre



**A4. Please indicate the area in which you live**

(Mark  one box only)

- Australian Capital Territory
- Sydney
- Regional/Rural New South Wales
- Melbourne
- Regional/Rural Victoria
- Brisbane
- Regional/ Rural Queensland  **▶ Skip to B1**
- Adelaide
- Regional/Rural South Australia
- Northern Territory
- Hobart
- Regional/Rural Tasmania
- Perth
- Regional/Rural Western Australia
- Prefer not to say

**A5. Do you live in Australia?**

(Mark  one box only)

- Yes
- No  **▶ Terminate**
- Prefer not to say  **▶ Terminate**



Australian Gambling Research Centre



## Section B - Wagering Participation

**B1. Which of the following did you place bets on during the past 12 months? (either online or offline)**

(Mark  all that apply)

- Sports
- Horse racing
- Harness racing (trots)
- Greyhound racing
- Fantasy sports (for money)
- eSports (for money)
- TV events/shows (e.g. the winner of a reality TV show)
- Current affairs (e.g. the winner of an election)
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_

**B2. How often did you place bets on the following activities in the past 12 months?**

(Mark  the appropriate response for each item. Leave blank if not applicable)

	4 or more times a week	2 to 3 times a week	Once a week	2 to 3 times a month	Once a month	A few times a year	Once or twice a year	Not sure
Sports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Horse racing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harness racing (trots)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



Greyhound racing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fantasy sports (for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
eSports (for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TV events/ shows (e.g. the winner of a reality TV show)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Current affairs (e.g. the winner of an election)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**B3. Where were you when you placed bets on the following activities in the past 12 months?**

(Mark  the appropriate response for each item. Leave blank if not applicable)

	At home	At a friend's/ family member's home	At work	At school/ university/ TAFE	At a licenced venue (e.g. pub, club, hotel)	At a casino	At a sporting event or racetrack	At a TAB/ UBET agency/ shop (separate to pub, club or hotel)	While commuting (e.g. on public transport)	Other (specify)
Sports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Horse racing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harness racing (trots)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Greyhound racing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fantasy sports (for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



ROY MORGAN

eSports (for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TV events/ shows (e.g. the winner of a reality TV show)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Current affairs (e.g. the winner of an election)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**B4. Which methods have you used to place bets on the following activities in the past 12 months?**

(Mark  the appropriate response for each item. Leave blank if not applicable)

	Online - using mobile/smartphone (app or website)	Online - using computer (e.g. PC, laptop)	Online - using internet enabled TV (e.g. TAB Active)	Online - using internet enabled telephone (e.g. VOIP)	Telephone call (not using internet)	Self-service terminal at a pub, club, stadium, racetrack, casino, TAB/UBET	In person (e.g., with a bookmaker or staff member) at a pub, club, stadium, racetrack, casino, TAB/UBET	Other (Specify)
Sports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Horse racing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harness racing (trots)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Greyhound racing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fantasy sports (for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
eSports (for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian  
Gambling  
Research  
Centre



TV events/ shows (e.g. the winner of a reality TV show)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Current affairs (e.g. the winner of an election)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**B5. On a typical day when you bet on the following activities in the past 12 months, roughly how much money did you place on bets (\$AUD per day)?**

Sports	<input type="text"/>
Horse racing	<input type="text"/>
Harness racing (trots)	<input type="text"/>
Greyhound racing	<input type="text"/>
Fantasy sports (for money)	<input type="text"/>
eSports (for money)	<input type="text"/>
TV events/shows (e.g. the winner of a reality TV show)	<input type="text"/>
Current affairs (e.g. the winner of an election)	<input type="text"/>





Australian Gambling Research Centre



## Section C - Online wagering

**C1. Roughly what percentage of all your bets in the past 12 months were placed using the following methods?**

*Total should add to 100%*

Online (using any device )    %

▶ IF < 1%  
Terminate

Telephone call (not using internet)    %

Self-service terminal at a pub, club, stadium, racetrack, casino, TAB/UBET    %

In person (e.g., with a bookmaker or staff member) at a pub, club, stadium, racetrack, casino, TAB/UBET    %

**C2. Roughly what percentage of the bets you placed ONLINE in the past 12 months would you describe as:**

*Total should add to 100%*

Planned in advance of the event    %

On impulse before the start of the event    %

On impulse during the event    %

**C3. How many online betting accounts do you have?**

▶ IF = 0  
Skip to C6

**C4. Have you ever closed an online betting account?**

(Mark  one box only)

Yes

No  ▶ Skip to C9



Australian Gambling Research Centre



**C5. Why did you close your betting account/s?**

▶ Skip to C9

**C6. Have you ever closed an online betting account?**

(Mark  one box only)

Yes

No, I have had account/s but they are all inactive  ▶ Skip to C9

No, I have never had an online account (I have only bet via telephone call)  ▶ Skip to C11

No, I have never had an account in my own name (only used someone else's)  ▶ Skip to C11

**C7. How long ago did you close your last betting account?**

|

 months

**C8. Why did you close your betting account/s?**

**C9. How old were you when you first signed up for an online betting account?**

|

 years

Don't know



Australian  
Gambling  
Research  
Centre



**C10. Have you ever specifically chosen to use or open a betting account with any offshore wagering companies?**

(Mark  one box only)

Yes

No

Prefer not to say

**C11. Overall, how does your ONLINE spending on sports/racing/other events compare now with 12 months ago?**

(Mark  one box only)

I now spend much more

I now spend a little more

I spend about the same

I now spend a little less

I now spend much less

**C12. What motivated you to bet ONLINE on sports/racing/other events in the last 12 months?**

(Mark  all that apply)

I enjoy a punt

I have a lot of experience/knowledge of sports and/or races

Having a bet makes watching sports/races more interesting

Betting is a social activity for me

The adrenaline rush

To feel part of the atmosphere of a big sporting/race event

To get ahead financially

To chase losses/win back money lost

I bet when I drink alcohol

I bet when I use other drugs

I enjoy betting with friends

I enjoy competing with other bettors

Boredom

Loneliness

My friends bet so I bet too



Australian  
Gambling  
Research  
Centre



- Easy (24-hour) access to betting
- Betting advertisements
- Betting promotions
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_

**C13. Is there anything that you've done to try to control the amount of money or time you spend betting ONLINE on sports/racing/other events during the last 12 months?**

(Mark  all that apply)

- Monitor how much money I spend betting on sports/races
- Set limits for how much I can spend each week
- Set limits for which days of the week I bet
- Avoid spending time with family/friends who regularly bet
- Avoid watching sports/races with ads for betting agencies
- Avoid drinking alcohol while betting
- Cancel or suspend apps/subscriptions to betting agencies
- Use joint bank accounts to manage how much I spend (e.g. with partner, friends)
- Remove access to mobile/internet data for betting
- Talk to friends or family about my betting
- Talk to health professionals about my betting
- Access help/information from gambling/betting help websites or online forums
- Substitute betting with other activities
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_

I do not do anything to limit my sports betting



Australian Gambling Research Centre



## Section D - Other gambling

**D1. Which of the following did you spend money on during the past 12 months?**

(Mark  all that apply)

- Poker machines (pokies) – online
- Poker machines (pokies) – licensed venue
- Casino table games (e.g. blackjack, roulette, but NOT poker) – online
- Casino table games (e.g. blackjack, roulette, but NOT poker) – licensed venue
- Poker – online
- Poker – licensed venue
- Poker – informal (e.g., with friends)
- None of the above  ▶ Skip to E1

**D2. How often did you spend money on the following in the past 12 months?**

(Mark  the appropriate response for each item. Leave blank if not applicable)

	4 or more times a week ▼	2 to 3 times a week ▼	Once a week ▼	2 to 3 times a month ▼	Once a month ▼	A few times a year ▼	Once or twice a year ▼	Not sure ▼
Poker machines (pokies) – online	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poker machines (pokies) – licensed venue	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Casino table games (e.g. blackjack, roulette, but NOT poker) – online	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



Casino table games (e.g. blackjack, roulette, but NOT poker) – licensed venue	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poker – online	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poker – licensed venue	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poker – informal (e.g., with friends)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Section E - Effects of gambling on health and wellbeing

### E1. Thinking about the last 12 months...

(Mark  the appropriate response for each item)

	Never ▼	Sometimes ▼	Most of the time ▼	Almost always ▼
Have you bet more than you could really afford to lose?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have you needed to gamble with larger amounts of money to get the same feeling of excitement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
When you gambled, did you go back another day to try to win back the money you lost?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have you borrowed money or sold anything to get money to gamble?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have you felt that you might have a problem with gambling?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



ROY MORGAN

Has gambling caused you any health problems, including stress or anxiety?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have people criticised your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has your gambling caused any financial problems for you or your household?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have you felt guilty about the way you gamble or what happens when you gamble?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**E2. Have you experienced any of these issues as a result of betting ONLINE on sports/racing/other events in the last 12 months?**

(Mark  the appropriate response for each item)

	Yes ▼	No ▼
Reduction of my available spending money	<input type="checkbox"/>	<input type="checkbox"/>
Reduction of my savings	<input type="checkbox"/>	<input type="checkbox"/>
Late payment on bills (e.g., utilities, rates)	<input type="checkbox"/>	<input type="checkbox"/>
Less spending on essential expenses such as medications, healthcare and food	<input type="checkbox"/>	<input type="checkbox"/>
Less spending on recreational expenses such as eating out, going to movies or other entertainment	<input type="checkbox"/>	<input type="checkbox"/>
Had regrets that made me feel sorry about my gambling	<input type="checkbox"/>	<input type="checkbox"/>
Felt ashamed of my gambling	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



**E2. Have you experienced any of these issues as a result of betting ONLINE on sports/racing/other events in the last 12 months?**

(Mark  the appropriate response for each item)

	Yes ▼	No ▼
Sold personal items	<input type="checkbox"/>	<input type="checkbox"/>
Increased credit card debt	<input type="checkbox"/>	<input type="checkbox"/>
Spent less time with people I care about	<input type="checkbox"/>	<input type="checkbox"/>
Felt distressed about my gambling	<input type="checkbox"/>	<input type="checkbox"/>
Felt like a failure	<input type="checkbox"/>	<input type="checkbox"/>
Reduced performance at work or study due to tiredness or distraction	<input type="checkbox"/>	<input type="checkbox"/>
Loss of sleep due to stress or worry about gambling or gambling-related problems	<input type="checkbox"/>	<input type="checkbox"/>
Experienced greater conflict in my relationships (e.g. arguing, fighting, ultimatums)	<input type="checkbox"/>	<input type="checkbox"/>
Neglected my relationship responsibilities	<input type="checkbox"/>	<input type="checkbox"/>
Increased my consumption of alcohol	<input type="checkbox"/>	<input type="checkbox"/>





Australian Gambling Research Centre



**E3. The following questions ask how satisfied you feel, on a scale from zero to 10.**

**Zero means you feel no satisfaction at all and 10 means you feel completely satisfied.**

(Mark  the appropriate response for each item)

	No satisfaction at all 0 ▼	1	2	3	4	5	6	7	8	9	Completely satisfied 10 ▼
Thinking about your own life and personal circumstances, how satisfied are you with your life as a whole?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with your standard of living	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with your health	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with what you are achieving in life	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with your personal relationships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with how safe you feel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with feeling part of your community	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How satisfied are you with your future security	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



## Section F - Consumer protection measures

**F1. In the past 12 months, have you been offered lines of credit from a betting company to make ONLINE bets on sports/races/other events?**

(Mark  one box only)

Yes

No

Prefer not to say

**F2. In the past 12 months, have you been offered credit contracts or referrals to a payday or short-term lender by a betting company in order to make ONLINE bets on sports/races/other events?**

(Mark  one box only)

Yes

No

Prefer not to say

**F3. Please indicate which consumer protection features you have seen on the apps and websites where you place ONLINE sports and/or race bets?**

(Mark  all that apply)

Features to set limits on how much I want to deposit in my account

Features to set limits on how much I want to bet/spend

Features to unsubscribe from direct marketing (e.g. emails, text messages)

Clear information about the terms and conditions for offers of any credit, voucher, reward or other benefit

Information about customer verification periods and waiting times

Features to close my account

Features to exclude myself from the app/website site for a period of time (i.e. time out/take a break)

Features to permanently exclude myself from the app/website

Clear and consistent responsible gambling messages

Access to regular financial statements

None of the above  ▶ Skip to F7



Australian Gambling Research Centre



**F4. In the last 12 months, which consumer protection features have you used on apps and websites where you placed **ONLINE** sports and/or race bets during the past 12 months?**

(Mark  all that apply)

- Features to set limits on how much I want to deposit in my account
- Features to set limits on how much I want to bet/spend
- Features to unsubscribe from direct marketing (e.g. emails, text messages)
- Clear information about the terms and conditions for offers of any credit, voucher, reward or other benefit
- Information about customer verification periods and waiting times
- Features to close my account
- Features to exclude myself from the app/website site for a period of time (i.e. time out/take a break)
- Features to permanently exclude myself from the app/website
- Clear and consistent responsible gambling messages
- Access to regular financial statements
- None of the above

**F5. In the last 12 months, how useful were the following features in terms of assisting you to manage the time and money you spent betting **ONLINE** on sports/racing/other events**

(Mark  the appropriate response for each item. Leave blank if not applicable)

	Not at all useful ▼	Not very useful ▼	Neither useful nor not useful ▼	Somewhat useful ▼	Very useful ▼
Features to set limits on how much I want to deposit in my account	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Features to set limits on how much I want to bet/spend	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Features to unsubscribe from direct marketing (e.g. emails, text messages)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clear information about the terms and conditions for offers of any credit, voucher, reward or other benefit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Australian Gambling Research Centre



**F5. In the last 12 months, how useful were the following features in terms of assisting you to manage the time and money you spent betting ONLINE on sports/racing/other events**

(Mark  the appropriate response for each item. Leave blank if not applicable)

	Not at all useful ▼	Not very useful ▼	Neither useful nor not useful ▼	Somewhat useful ▼	Very useful ▼
Information about customer verification periods and waiting times	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Features to close my account	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Features to exclude myself from the app/website site for a period of time (i.e. time out/take a break)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Features to permanently exclude myself from the app/website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clear and consistent responsible gambling messages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to regular financial statements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**F6. What are the main reasons you found the following features useful or not useful?**

		Not Applicable ▼
Features to set limits on how much I want to deposit in my account	<input type="text"/>	<input type="checkbox"/>
Features to set limits on how much I want to bet/spend	<input type="text"/>	<input type="checkbox"/>



Australian  
Gambling  
Research  
Centre



ROY  
MORGAN

**F6. What are the main reasons you found the following features useful or not useful?**

Not  
Applicable  
▼

Features to unsubscribe from direct marketing  
(e.g. emails, text messages)



Clear information about the terms and  
conditions for offers of any credit, voucher,  
reward or other benefit



Information about customer verification periods  
and waiting times



Features to close my account



Features to exclude myself from the  
app/website site for a period of time (i.e. time  
out/take a break)



Features to permanently exclude myself from  
the app/website



Clear and consistent responsible gambling  
messages



Australian Gambling Research Centre



**F6. What are the main reasons you found the following features useful or not useful?**

Not Applicable  
▼

Access to regular financial statements

**F7. Are there any other measures or features that you think ONLINE wagering companies could implement to help to prevent or reduce gambling-related harm among their customers?**

**Section G - Demographics**

**G1. What is your postcode?**

Don't know

**G2. In which country were you born?**

(Mark  one box only)

Australia

Other (please specify below ✓)\*

\*Please specify other: \_\_\_\_\_



Australian  
Gambling  
Research  
Centre



ROY  
MORGAN

**G3. Do you identify as Aboriginal or Torres Strait Islander?**

(Mark  one box only)

- Yes, Aboriginal
- Yes, Torres Strait Islander
- Yes, both Aboriginal and Torres Strait Islander
- No
- Prefer not to say

**G4. What languages do you and your family speak at home?**

(Mark  one box only)

- English only
- English and other languages (please specify below ✓)\*

\*Please specify other: \_\_\_\_\_

Other languages only (please specify below ✓)\*

\*Please specify other: \_\_\_\_\_

**G5. What are your usual living arrangements?**

(Mark  one box only)

- Live alone
- Live with parents
- Live in share house with other adults
- Live with partner (no children)
- Live with partner (with at least one dependent child)
- Live with at least one dependent child (single parent)
- No specific address
- Other (please specify below ✓)\*

\*Please specify other: \_\_\_\_\_



Australian  
Gambling  
Research  
Centre



ROY  
MORGAN

**G6. Are you currently ...**

(Mark  one box only)

- Single
- In a relationship
- Married/De facto
- Divorced/Separated
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_

**G7. Are you currently employed?**

(Mark  one box only)

- Yes, full-time
- Yes, part-time
- Yes, casual
- Not employed – looking for work
- Not employed – not looking for work
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_

**G8. Are you currently studying?**

(Mark  one box only)

- No, not currently studying
- Yes, full-time
- Yes, part-time
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_





Australian Gambling Research Centre



ROY MORGAN

**G9. What is the highest level of education that you have completed?**

(Mark  one box only)

- Year 10 or below
- Year 11 or equivalent
- Year 12 or equivalent
- A trade, technical certificate or diploma
- A university or college degree
- Postgraduate qualifications
- Other (please specify below ↵)\*

\*Please specify other: \_\_\_\_\_

**G10. In what year were you born?**

(Please enter full year, e.g. 1940, 1970, 2000)

--	--	--	--

Don't know

I prefer not to say

**G11. What is your usual take-home, weekly income from all sources (AFTER TAX has been taken out)?**

(Mark  one box only)

- \$49 or less (\$2,599 or less per year)
- \$50 to \$99 (\$2,600 to \$5,199 per year)
- \$100 to \$199 (\$5,200 to \$10,399 per year)
- \$200 to \$299 (\$10,400 to \$15,599 per year)
- \$300 to \$399 (\$15,600 to \$20,799 per year)
- \$400 to \$499 (\$20,800 to \$25,999 per year)
- \$500 to \$599 (\$26,000 to \$31,199 per year)
- \$600 to \$699 (\$31,200 to \$36,399 per year)
- \$700 to \$799 (\$36,400 to \$41,599 per year)
- \$800 to \$899 (\$41,600 to \$46,799 per year)
- \$900 to \$999 (\$46,800 to \$51,999 per year)
- \$1,000 to \$1,099 (\$52,000 to \$57,199 per year)



Australian Gambling Research Centre



ROY MORGAN

- \$1,100 to \$1,199 (\$57,200 to \$62,399 per year)
- \$1,200 to \$1,299 (\$62,400 to \$67,599 per year)
- \$1,300 to \$1,399 (\$67,600 to \$72,799 per year)
- \$1,400 to \$1,499 (\$72,800 to \$77,999 per year)
- \$1,500 or more (\$78,000 or more per year)
- Don't know
- Prefer not to say

**G12. Is there anything else you'd like to tell us about your experiences betting ONLINE on sports/racing/other events, or your experience with tools to reduce harm or control your gambling practices?**



Australian  
Gambling  
Research  
Centre



## Section H - Prize Draw

**H1. To thank people for their time, we will award \$200 eGift cards to five randomly selected participants. Do you wish to go in the draw?**

(Mark  one box only)

Yes

No  ▶ End of survey

**H2. Please enter your contact details:**

*Your contact details will be securely deleted once the draw is completed.*

First Name

Email address

Thank you for your time and assistance. This market research is carried out in compliance with the Privacy Act, and the information you provided will be used only for research purposes.

If you would like any more information about this project or Roy Morgan Research, you can phone us on 1800 337 332

### *Support services*

If you would like to talk to someone for support with your gambling or other personal issues, please call the following support services for help.

Each of these services are available 24 hours a day, 7 days a week.

- Gambling Help Online 1800 858 858  
<https://www.gamblinghelponline.org.au>  
This is a dedicated support service for people who gamble, their families and friends.
- Lifeline 13 11 14  
This is a service that provides immediate crisis support and is open to all people.