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# NORTHERN TERRITORY RACING AND WAGERING COMMISSION

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6 May 2025

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Director – Strategic Projects  
Department of Infrastructure, Transport, Regional  
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File Location  
DOB2014/3583-0002

Via email: [Online.Gambling@communications.gov.au](mailto:Online.Gambling@communications.gov.au)

Dear Director,

## **Re: Statutory Review of BetStop – submission by NT Racing and Wagering Commission**

Thank you for the opportunity to provide a submission to the statutory review of BetStop – the National Self Exclusion Register. The Northern Territory Racing and Wagering Commission (Commission) was also pleased to meet to discuss the review at a meeting in Darwin on 20 January 2025.

The Commission confirms its consent for this submission to be made publicly available and provided in response to any FoI requests.

### **Commission support for an effective national self exclusion scheme.**

The Commission is unwavering in its support for an effective national self exclusion scheme. An effective national scheme overcomes the primary problem with any state or territory-based scheme, which is that such a scheme only operates to prevent a self excluded person from opening and operating an account with operators licensed in that state or territory.

### **Previous submissions by the Northern Territory Racing Commission.**

The Northern Territory Racing Commission (former Commission) was replaced by the Commission upon commencement of the *Racing and Wagering Act 2024* on 1 July 2024. The former Commission made a number of submissions during the development and initial operation of BetStop. The Commission has also raised issues after 1 July last year. Many of the issues raised in those submissions remain relevant and reflect the current concerns of the Commission. Rather than repeating them here, the Commission refers to and adopts the following submissions:

1. February 2023 Submission to the House of Representatives Inquiry into online gambling and its impacts on those experiencing harm (submission 143);
2. Letter dated 22 August 2022 to Chair of ACMA;
3. Letter dated 3 January 2023 to Department of Social Services CEO;
4. Letter dated 5 July 2024 to Department of Social Services CEO; and
5. Letter dated 5 July 2024 to ACMA Deputy Chair and CEO.

The primary concern raised by the Commission and former Commission in these submissions and which has not been satisfactorily addressed in the development and operation of BetStop, is that some self-excluded persons struggling with a gambling addiction may go to extraordinary lengths to open an account with an online wagering operator, including by using differing information in order to circumvent the system to open an account.

The Commission is pleased to note that the Commission's recommendation that the national requirement for account holder verification within 72 hours of opening an account be replaced by a requirement that account operator verification occurred prior to the account holder being able to place a wager has now been implemented. The Commission is of the view that this measure has significantly reduced the number of persons who have been able to open an account and experience harm despite being registered with BetStop.

### **Recent reported issues with BetStop**

- *Circumvention of BetStop Register*

As mentioned, one of the most critical issues with the BetStop system is the ability of individuals to circumvent the self exclusion process, which significantly undermines the effectiveness of the register. While BetStop is designed to prevent individuals from wagering with any licensed operator during their exclusion period, the reality is that some users are able to bypass the system entirely by creating new accounts by manipulating their personal information. This ability to evade detection means that individuals can continue to wager without their actions being flagged by the BetStop register, which defeats the purpose of the exclusion framework in the first place.

The Commission continues to receive reports from operators licensed in the Northern Territory concerning individuals who are registered with BetStop and who are able to open an online wagering account.

In February this year, an operator reported that BetStop failed to identify a customer who was registered with BetStop, and who successfully opened an account using the same date of birth and address as his BetStop registration. He used a different email address and mobile number, and he added a full stop at the end of his surname, and BetStop failed to recognise that he was self excluded. The operator subsequently did a manual review and closed the account.

Another operator also reported in February that an individual registered with BetStop was able to open ten separate accounts under multiple brands. Three of the accounts were opened using completely different identities, and BetStop could not have reasonably been expected to identify those. However, other accounts were able to be opened by slightly modifying the individual's first name (for example, adding "ie" and "yy" and "o" at the end), and by slightly modifying the date of birth, and using differing email addresses and telephone numbers. The operator identified the issue through IP matching however that would not have identified the individual had they opened multiple accounts with different operators.

Improvements are needed to address the critical flaw in the BetStop system, where some users can bypass the self exclusion process by creating new accounts through the manipulation of their personal information. This ability to evade detection undermines the core function of BetStop, as individuals can continue to engage in wagering without their actions being flagged by the BetStop register. As a result, the system's ability to protect vulnerable individuals from harmful wagering behaviours is significantly weakened, effectively defeating the purpose of the exclusion framework.

- New Account Requirement Impact on Historical data Analysis

Numerous operators have also raised with the Commission a significant concern that the BetStop requirement that should an individual wish to recommence wagering at the end of a self exclusion period, a new account must be opened, limits the capacity of the operator to have regard to previous wagering activity in order to determine if the individual is engaging in unsafe wagering behaviour. This stipulation severely limits an operator's ability to monitor an individual's wagering behaviour comprehensively. By forcing individuals to create new accounts, operators are denied access to critical historical data on previous wagering activity, which is essential in identifying potential indicators of unsafe or problematic wagering patterns.

Without access to this data, operators are at a distinct disadvantage in their ability to detect early warning signs of harmful wagering behaviour, such as escalation in frequency, bet size, or riskier wagering strategies. Moreover, the lack of continuity in tracking an individual's wagering history not only undermines the ability to assess whether the individual is at risk of relapse, but it also diminishes the efficacy of responsible gambling measures, which are often built upon ongoing assessments of user behaviour.

Additionally, this policy may inadvertently contribute to a 'reset' effect, where individuals who have self-excluded are essentially treated as new customers, bypassing any pre-existing safeguards that were in place before the self exclusion. This creates an environment where individuals who may still be vulnerable to gambling harm could be left unchecked. It also places the on operators to rely on incomplete or insufficient data when making determinations about a person's wagering habits post-exclusion, which could result in missed opportunities for early intervention.

The ability to access and analyse an individual's historical wagering data is a fundamental component of effective harm minimisation practices. It allows operators to identify and mitigate risks before they escalate, enabling tailored interventions based on a person's wagering history. Without this access, operators face significant challenges in fulfilling their regulatory responsibilities, potentially leaving individuals at risk of falling back into harmful wagering behaviours. This lack of continuity in tracking wagering activity inadvertently weakens the overall integrity of responsible gambling efforts, undermining the goal of protecting vulnerable customers and exacerbating the potential for gambling related harm. Therefore, reconsideration of the current policy is essential to ensure that operators are equipped with the tools necessary to effectively safeguard against relapse and support long-term harm reduction strategies.

### **NT Self Exclusion Register**

In the light of the continued reported issues with BetStop, the Commission continues to operate its own self exclusion register.

### **Concluding Remarks**

An effective National Self Exclusion Register is a vital tool in preventing harm from online wagering and is fully supported by the Commission. However, in the Commission's experience, individuals in the grip of a gambling addiction may go to great lengths to circumvent the register to open a wagering account.

The Commission acknowledges that there is most likely only a small number of persons who are able to successfully open an account while they are registered on BetStop. However, in the Commission's view these individuals are the persons who require the most protection, and the Commission looks forward to the statutory review considering how BetStop can be made effective to protect them from harm.

Please do not hesitate to contact me if you require any further information, or if the Commission can assist with this important review in any way.

Yours sincerely

A handwritten signature in black ink that reads "Alastair Shields". The signature is written in a cursive, flowing style.

Alastair Shields  
Chair, Northern Territory Racing and Wagering Commission