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Director – Strategic Projects  
Media Industry and Sustainability Branch  
Department of Infrastructure, Transport,  
Regional Development, Communications and the Arts  
GPO Box 594  
Canberra ACT 2601

**Re: Statutory Review of BetStop – the National Self Exclusion Register**

Thank you for the opportunity to provide feedback on whether the current regulatory arrangements are fit for purpose or where changes may be needed to:

- Better meet user needs
- Address any unintended consequences or system gaps
- Ensure that regulatory arrangements remain consistent with the Australian Government's gambling harm minimization policy objectives and are working effectively to protect vulnerable Australians from gambling harm

Racing Australia is fully supportive of the National Self Exclusion Register (NSER) as a strong component of the Australian Government's gambling harm minimization policy objectives.

Now that it has been in operation for 12 months we would like to make the following observations.

1. We believe that the scope of the NSER should be expanded to incorporate other online gaming products including Keno, lotteries and online casinos. At present there is a singular focus on wagering whether it be racing or sports, however this ignores the proposition that a problem gambler will gamble on whatever they can and all forms of online gambling should be subject to the options of self exclusion through the NSER. Our understanding is that there is a high proportion of online problem gamblers external to racing and sports wagering products.

2. We understand that the current process is that the licensed interactive wagering provider is required to check their data against the NSER with a charge every time this is carried out. We are concerned on two matters:
  1. This is a reactionary process rather than a proactive process.
  2. Levying a charge each time data is checked could act as a deterrent to actively and regularly check exclusions.

When a person self excludes, then that information should be distributed to the licensed interactive wagering providers as soon as it is available. Harm minimization would require that the exclusion be applied as soon as practicable. The running of licensed interactive wagering providers data against the NSER should still be performed on a regular basis but as a cross check to ensure all exclusions have been applied. Charging for every time a check is run would penalize those organizations that want to do the right thing and check regularly to ensure exclusions are applied appropriately.

3. We understand that the NSER does not report the length of time an individual has self excluded when a check is run by the licensed interactive wagering provider. We believe that this would assist the process by setting bounds within which the parties could reduce the amount of data they are checking and also contribute to the overarching objective of gambling harm minimization. At present a self excluded individuals gambling history is lost when the account is removed, thus the licensed interactive wagering provider is unable to utilize its own systems to mitigate harm as they lose visibility as to whether they should watch/monitor betting habits.
4. Our understanding of the checking process is that it requires exact matches. Our view is that there should be some use of AI driven "fuzzy logic" to catch those who have previously self excluded but then apply for an account with a variation of their name or address. There should also be a capability to link the differing ID's.

It is the view of Racing Australia that consideration of the above four points will lead to positive improvements to harm minimization objectives. We would be happy to discuss the above further with you.

Yours Sincerely



**Paul Eriksson**  
**Racing Australia**  
**Chief Executive Officer**