



THE UNIVERSITY OF
SYDNEY

Communication Branch
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
Commonwealth of Australia

24 April 2025

Dear Mr Eccles,

Please find below my response to the consultation paper on Statutory review of BetStop – the National Self Exclusion Register.

I am highly supportive of a national self exclusion register and support the extension of this to all online forms of gambling, including keno and lotteries. My submission is based on my experience as an independent researcher and Director of Australia's only university-based gambling treatment clinic. I have responded to the specific questions in the attached document and am happy to provide further input into the process as would be helpful.

Yours Sincerely,

Sally Gainsbury

Director, Gambling Treatment & Research Clinic
Professor, School of Psychology
Leader, Technology Addiction Team, Brain and Mind Centre
University of Sydney

CONSULTATION PAPER ON BETSTOP – THE NATIONAL SELF EXCLUSION REGISTER

OVERVIEW

I am highly supportive of a national self exclusion register and support the extension of this to all online forms of gambling, including keno and lotteries. In addition to this statutory review, I highly recommend research be commissioned to understand the user experience in more detail including motivations and barriers to engage with BetStop, user experience with BetStop, and the extent to which BetStop has contributed to a reduction in gambling-related harm for individuals and family members as well as any inadvertent negative consequences. Specific research is necessary as public consultations are not effective in gauging the experience of a representative sample of BetStop users.

WHAT WORKS WELL

Australia joins a few other jurisdictions who provide a national self exclusion scheme, although this is limited to online wagering, which represents a small proportion of the total gambling market in Australia and accounts for a minority of gambling-related harms. It is highly useful for consumers to be able to self exclude from all online wagering platforms in Australia at one time.

OPPORTUNITIES FOR IMPROVEMENTS

There are several opportunities to improve and augment BetStop:

- Individuals who self-exclude should have their accounts de-activated, but not deleted by wagering operators. It is essential that operators can identify customers who have returned from a period of self-exclusion and differentiate these from customers opening new accounts for the first time. A consumer would reasonably expect that an operator would have access to their history prior to self-exclusion and be making assessments of their risk levels based on their history prior to self-exclusion. Efforts to identify customers who may be at-risk for experiencing gambling harms need to have as much information and context as possible and a customer's history of self exclusion is vital to this.
- Individuals who re-open accounts following self exclusion should be automatically defaulted out of receiving any marketing or promotional materials and be required to set a deposit limit with a reasonable maximum threshold. These measures are appropriate as the individual has indicated that they have had difficulty controlling their gambling and would benefit from external resources to assist with this.
- Individuals should not be notified when their self exclusion period has lapsed. This information should be accessible for individuals if they wish to find it, but they should not receive any notifications or prompts which may encourage them to return to gambling.
- Individuals who have self-excluded should be able to be contacted for the purposes of research and evaluations of BetStop in an appropriate manner such that the program can be evaluated and refined to improve its effectiveness.
- All online gambling operators should be required to be part of BetStop including keno and lottery providers. Individuals who wish to self exclude from gambling sites are indicating a lack of control. It is reasonable that they be excluded from all forms of online gambling.



- Efforts should be made to extend BetStop to all forms of gambling including land-based gambling. It is noted that there would be considerable complexity to achieving this, however, it is a worthwhile goal that would hugely enhance the effectiveness of the national self exclusion register.
- BetStop represents a valuable opportunity and demonstration for how data can be shared between operators in a timely, yet secure and private manner. It is recommended that efforts are made to extend the functionality to share additional information between operators. Examples include informing operators if one of their customers has been flagged for engaging in potentially risky gambling such that they can monitor closely for behavioural markers of risk on additional sites. Individuals who gamble in a risky manner and experience gambling problems are highly likely to be gambling across multiple sites. This makes it difficult to identify risky gambling as risk indicators may be seen across sites rather than displayed on a single site. The ability to note if risk indicators are observed for a customer at another gambling site would greatly assist online operators to identify customers who may be experiencing gambling problems and offer appropriate interventions and support. Creating a database that provides a more holistic view of customers would allow a mechanism for industry-wide protection of customers.

FEEDBACK AS A SUPPORT SERVICE

- Feedback from clinicians who work with clients seeking treatment for gambling-related issues is that relatively few clients report engaging with BetStop. Amongst those who have reported feedback, this relates to the difficulty of identifying appropriate support and treatment services through BetStop. It is recommended that BetStop be updated to make it easy for individuals enrolling in BetStop to identify relevant treatment and support options.