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The Reviewer

Statutory Review of BetStop – The National Self Exclusion Register

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Statutory Review of BetStop – The National Self Exclusion Register – submission from Relationships Australia

Thank you for the opportunity to make a submission to your review of BetStop, following our discussion earlier this year. Options to allow people experiencing gambling harm to self-exclude are important mechanisms in countering the escalating crisis in terms of the increasing numbers of people experiencing gambling harm, the mounting total of financial losses accumulated by end-users in Australia, and the contribution of gambling harms to poor mental health and social connection. We welcome this Review as an opportunity to enhance the capacity of the Register to support timely self-exclusion and impair predatory marketing.

This consultation is being undertaken in the context of dynamic and siloed policy discourses about online safety (including online safety for children and young people), fair commercial practices across the economy, community concerns about gambling advertising and gambling harms, and connections between gambling harm and domestics and family violence, abuse of older people, and mental ill health. The recommendations which Relationships Australia offers in this submission acknowledge the inter-dependencies between BetStop and other important areas of policy and programme reform. Indeed, BetStop cannot achieve its purposes in isolation from, for example, universally accessible and evidence-based therapeutic services, or robust online safety reforms for children and young people.

Accordingly, this submission is informed by the various submissions that Relationships Australia has provided to inquiries about these and adjacent issues (such as classification policy). Our submissions can be found at <https://www.relationships.org.au/research/#advocacy>

Recommendations

Recommendation 1

As one element of the digital duty of care (Rickard Report, Recommendation 4), the Government should amend the *Interactive Gambling Act 2001* (the Act) to require licensed

interactive wager service providers (LIWSP) to take all reasonable steps to prevent registrants from circumventing a registration and accessing their services. This may involve:

- imposing on LIWSPs an explicit statutory duty to verify identity and prevent access to their services by registered individuals, and
- requiring that if a person seeks to open an account with an LIWSP, and their identity details match those of an existing registrant to a prescribed extent, then that person cannot open or use an account until the LIWSP establishes affirmatively that the customer is not currently registered with BetStop using a different account.

Recommendation 2

Australian governments should invest in harm minimisation services in a quantum that is proportionate to gambling revenue realised by those governments and should reflect the cost of gambling harms borne by individuals, families and communities, and explore whether taxation should be applied to ensure that there is sustained funding available to support both:

- universally accessible therapeutic services for people experiencing gambling harms, and
- effective regulatory activity.

Recommendation 3

The *Interactive Gambling Act 2001* should:

- confer upon the ACMA power to order refunds and redress, in addition to its regulatory powers, and
- The *Interactive Gambling Act 2001* should create a statutory cause of action for individuals harmed by breaches of their duties by LIWSPs.

Recommendation 4

The Commonwealth should, as a matter of urgency, implement the recommendations made in the *You win some, you lose more* report.

Recommendation 5

Australian governments should use every available legislative, policy and program lever to:

- prevent the inter-generational normalisation of gambling, including through advertising, as a preferred means of solo and communal leisure activity
- prevent under age gambling (including through reforms of the *Online Safety Act 2021* and the National Classification Scheme)
- prevent gambling providers from advertising in spaces (including online spaces) accessible to children and young people (consistent with the *You win some, you lose more* report)

- prevent exposure to aggressive and predatory marketing by LIWSPs, including through dark patterns¹
- identify under age gambling where it is occurring, and intervene early to minimise financial losses and other gambling harms (including to educational and employment engagement, family relationships and social connection)
- offer non-stigmatising, timely and accessible pathways for children and young people to seek and receive help to address harmful gambling behaviours
- offer accessible pathways for carers of children to bar children’s access to gambling and gambling-like activities²
- explore accessible pathways for children and young people to self-exclude, and
- effectively counter narratives, appealing to children and adults alike, which link gambling and gambling-like activities to fulfilling intimate and social relationships, and narratives that position gambling as an innocuous ‘little treat’, ‘self-care’, or as a pathway to profitable side hustles.

Recommendation 6

To minimise policy and service delivery fragmentation and siloes, Australian governments should collaborate to develop a comprehensive public health approach to gambling harms, which must prioritise early intervention and proactive measures and encompass a range of targeted initiatives, including:

- support services for individuals and families experiencing low levels of harm: Providing early intervention and support services can help prevent the escalation of gambling and mitigate the potential for more severe harms.
- technological restrictions on access: Leveraging available technological solutions to limit access to foreign matched lottery and online keno products, especially for vulnerable populations, and
- whole-of-government approach: Exploring the potential to leverage the regulatory powers of the Office of the eSafety Commissioner, or another suitable agency, as part of a coordinated, whole-of-government strategy, could significantly enhance the ability to address the proliferation of online gambling harms.

Recommendation 7

The Register should include online keno product services and operators.

¹ See, eg, *Playing the Player*, 2025; Pitt et al, 2024; Backholer & Pathirana, 2024.

² ‘Gambling-like’ activities include activities in online games such as loot boxes, skin betting, certain kinds of scarcity cues, earned battle passes: Gupta et al, 2025. In respect of loot boxes, Gupta et al, 2025, note that the regulation of randomisation of rewards for electronic gaming machines (pokies) is entirely absent in digital gaming (see p 44).

The work of Relationships Australia

Relationships Australia is a federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances. Relationships Australia provides a range of services, including counselling, dispute resolution, children's services, services for victims and perpetrators of family violence, services for older people, and relationship and professional education.

We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others. Relationships Australia has provided family relationships services for 75 years. Our State and Territory organisations, along with our consortium partners, operate approximately one third of the Family Relationship Centres (FRCs) across the country. In addition, Relationships Australia Queensland operates the national Family Relationships Advice Line and the Telephone Dispute Resolution Service. Relationships Australia Queensland is the largest, and longest serving, provider of Gambling Help Services (GHS)³ in Queensland.⁴ Relationships Australia Canberra & Regions (RACR) delivers the ACT Gambling Support Service.⁵

Relationships Australia South Australia works closely both with those affected by gambling-related harm and with their families. In the 2023-2024 financial year, investment in its GHS accounted for 8% of RASA's expenditure (RASA Annual Report, 2023-2024). RASA offers LEIGH (the Lived Experience in Gambling Harm Program), which includes a Peer Support and a Volunteer Speaker program, which builds capacity in the lived experience community to share their experiences and raise awareness. RASA also makes available specialist financial counselling and support tailored for people who wish to put a gambling bar in place. In 2019, an independent cost benefit analysis of RASA's GHS found that

Services provided by Relationships Australia SA through Gambling Help Services between 2011/12 and 2018/19 generated positive net benefits for South Australia. The total discounted value of these net benefits over the period is estimated at almost \$60 million. Over the period of analysis, \$7 of benefits have been realised for every \$1 spent on the program. (BDO EconSearch, 2019)

As with our recent submissions to the review of regulation of online keno and foreign matched lotteries, and the inquiry by the House of Representatives Social Policy and Legal Affairs

³ Gambling Help Services provide counselling, education and financial counselling services to people experiencing gambling related harm.

⁴ RAQ delivers the 24/7 Queensland Gambling Helpline, including operation of the Queensland Gambling Help Website <https://www.gamblinghelpqld.org.au/> and the Gambling Help Counselling and Community Education programs in Mackay, the Sunshine Coast, Moreton Bay, the Greater Brisbane Region, the Gold Coast, Ipswich and the Lockyer Valley. These services are also available state-wide by web and social media.

⁵ RACR's Gambling Help Service, which includes a 24/7 helpline, is funded by the ACT Gambling Harm Prevention and Mitigation Fund.

Committee into online gambling and its impacts on those experiencing gambling harm, the stories and voices of our clients are represented in this submission, together with reflections and recommendations based on our practice experience. Our previous submissions can be found at <https://relationships.org.au/what-we-do/#advocacy>

Framing Principles for Submission

Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all. Our commitment to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing.

A commitment to respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people is acutely important to policy and programme development and service delivery. Connection to Country, and the context-specific experiences of kinship, for example, do not countenance the hyper-individualism that pervades Western social and economic assumptions. Centring the epistemologies and experiences of Aboriginal and Torres Strait Islander people is a necessary (although not sufficient) step in achieving the targets in the National Agreement on Closing the Gap.

Principle 2 - Harmful gambling threatens families and communities

Isolation and loneliness

Some people can, without noticing, become increasingly isolated as they immerse themselves in gambling. They lose the protective factors that social connection provides, and are exposed to a range of harms to physical and mental health that accompany social exclusion and loneliness. In studies of young people, social isolation and loneliness have consistently been associated with poor health outcomes. Pressman and colleagues (2005), for example, found small social networks were independently associated with poor immune response, while adolescents who do not have close friendships and good social networks consistently report lower levels of self-esteem, more psychological symptoms of maladjustment, and are at higher risk of suicide (Kidd, 2004).

Gambling, for some individuals, becomes a substantial barrier preventing them from initiating and nurturing social connections with family, friends and the broader community. Social connection has been studied extensively, both in Australia and overseas, with authors now firmly agreeing about the importance of social connection in shaping wellbeing across the life span. So important and fundamental is our need to belong, it has often been considered as central to human evolution, with group membership increasing the survival of the human

species by encouraging our ancestors to coordinate activities that promoted advantages such as sharing and protecting food, shelter and resources (Baumeister & Learly, 1995).

It is therefore not surprising that deficits in experiences and feelings of belonging have been associated with a range of poor mental, physical and socio-economic outcomes for people, their families and communities. In a meta-analytical review of literature, people who are socially isolated or lonely are at risk of premature mortality at rates comparable with other well-established risk factors, including lack of physical activity, obesity, substance abuse, poor mental health, injury and violence (Holt-Lunstad, 2015). The research literature also identifies relationships between loneliness and poor mental health, including depression and anxiety (Mills & Rubin, 1998; Nangle et. al., 2003; Wang et. al., 2018), lower levels of self-worth (Qualter & Munn, 2002), life satisfaction (Goodwin, Cook, & Yung, 2001) and subjective wellbeing (eg Chipuer, Bramston & Pretty, 2003).

Loneliness is a complex social problem and a public health concern, which should be regarded as a social determinant of health in its own right. It stems from dissatisfaction with our relationships, a lack of positive and respectful relationships, or both of these. It is often caused by experiences of exclusion due to structural and systemic social realities that form obstacles to participation in social, economic, cultural and political life. As a public health concern (Heinrich & Gullone, 2006; Holt-Lunstad et al, 2015; Mance, 2018; AIHW, 2019), loneliness has been linked to physical health risks such as being equivalent to smoking 15 cigarettes a day and an increased risk of heart disease (Valtorta, 2016). Loneliness is a precursor to poorer mental health outcomes, including increased suicidality (Calati et al, 2019; McClelland et al, 2020; Mushtaq, 2014).⁶

Gambling and domestic and family violence

Gambling-related harm almost always includes a complex mix of health, financial, relationships and social issues that span domestic and family violence, elder abuse, mental health issues, substance abuse and homelessness. Australian research has found, inter alia, that:

- gambling does not directly cause intimate partner violence, but can intersect with it in a range of different ways, including by exacerbating existing violence
- the community lacks awareness about harmful gambling, including its links to intimate partner violence, and
- gambling-related harm (including economic abuse) is enabled by current protocols of gambling operators and financial institutions (Hing et al, 2020).

⁶ The campaign Ending Loneliness Together has released a guide that explains how community organisations can use validated scales to measure loneliness: https://endingloneliness.com.au/wp-content/uploads/2021/08/AGuidetoMeasuring-Loneliness-for-Community-Organisations_Ending-Loneliness-Together.pdf

Further, gambling has been linked with perpetration of abuse of older people (particularly by friends of older people).⁷

Principle 3 - Online gambling harm is a pressing public health concern

The expansion of online gambling has been rapid, sustained and escalating. It is offered as an online only product, or as a companion product to offline or land-based activities, and so requires multi-pronged strategies to prevent gambling-related harms. Online gambling is largely synonymous with internet, remote, and interactive gambling. In this submission, 'online gambling' refers to the range of gambling activities offered through interactive technology, including computers, mobile and smart phones, tablets, and digital televisions. While this mode of technologically supported gambling shares most hallmarks of other gambling activities, differences arise from gambling in person at land-based retail outlets and venues and placing wagers over the telephone, mainly in terms of unbridled accessibility. (Gainsbury, 2015b)

The Australian Gambling Research Centre has found that 46% of Australians who gamble were classified as being at some risk of gambling harm.⁸ 'Harmful gambling' refers to 'difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community' (Neal, Delfabbro & O'Neil, 2005). The stigma around seeking help for gambling harm creates barriers, together with shame and indebtedness. Robust and targeted data collection about suicides in Hong Kong identified strong correlations between gambling harm and a 20% heightened suicide risk.⁹ Explicitly framing gambling harms, in public policy discourse and community awareness/education, as a public health issue:

- recognises the neurobiological mechanisms of harmful gambling¹⁰
- addresses narratives that position harmful gambling as a manifestation of moral failings of an individual, and
- would dilute the stigma currently felt by those experiencing gambling harm, and so lower barriers to help-seeking, encouraging help-seeking earlier and thus minimising harm.

Regulatory settings must reflect the profound asymmetries of information and power between LIWSPs and users, and the consequent gravity of risk and harm. The premise that online gambling can be appropriately regulated through an ordinary consumer/provider conceptualisation is inherently flawed due to these asymmetries.

In this sense, gambling-related harms constitute a significant and increasingly pressing public health issue in Australia. Its harms affect not only those who gamble, but also their families and friends, the community and governments. A number of studies have found greater levels of

⁷ Qu et al, 2020; see especially pp 73-74, 76-77, 81.

⁸ AGRC Community attitudes snapshot, March 2023.

⁹ See <https://www.financialcounselingaustralia.org.au/study-gambling-related-suicide/>.

¹⁰ See, eg, Potenza et al, 2019.

harmful gambling among online, compared to offline, gamblers (eg Griffiths et al., 2009; Wood & Williams, 2011). In 2011, the rate of harmful gambling among online gamblers was three times higher than for offline gamblers (Gainsbury, Russell, Hing et al., 2014).

Principle 4 -Children and young people are exposed to gambling harms in multiple ways

..simulated gambling products have the potential to normalise and encourage monetary gambling, *especially among children and young people....*¹¹[emphasis added]

Relationships Australia considers that law, policy and programme design should reflect that children (including very young children) and young people between 12-19 years of age are exposed to gambling harms through:

- family members who are gambling and experiencing harms that affect their relationships (eg by undermining their capacity to parent)
- the normalisation of gambling as a preferred means of solo and communal leisure activity
- exposure to aggressive and predatory marketing by LIWSPs, including through dark patterns¹²
- their own direct engagement in gambling and gambling-like activities (see, eg, Saunders & Harrington, 2025; Greer, Boyle & Jenkinson, 2022), leading to their direct exposure to gambling harms, including harms to relationships, to financial loss and to loss of privacy through data grabs.

The Rickard Report called for harms to young people, including child sexual exploitation and abuse, bullying and problematic internet use, to be highlighted for attention under a digital duty of care. We consider that exposure to online gambling and gambling-like activities falls within scope of 'problematic internet use' which causes children and young people to experience harms to their health and wellbeing.

General comments

Relationships Australia is concerned about the growing prevalence of individuals using multiple accounts and sophisticated methods to circumvent firewalls and other protective measures put in place by online gambling platforms. If left unchecked, this troubling trend not only undermines the effectiveness of existing harm minimisation strategies but also leaves consumers of all ages vulnerable to a range of other risks.

Adding to these concerns is the alarming risk of data breaches affecting online gambling operators; this is particularly concerning given the prevalence of data grabs by LIWSPs (and gaming operators). The exposure of personal and financial information of customers further

¹¹ Gupta et al, 2025, citing Sakata & Jenkinson, 2022.

¹² See, eg, Playing the Player, 2025; Pitt et al, 2024; Backholer & Pathirana, 2024.

exacerbates the potential for harm, as this sensitive data can be exploited by unscrupulous actors, leading to identity theft, financial fraud, and other enduring consequences for affected individuals. Further, children who engage in online gaming are subjected to data grabs with little or no understanding of the value and implications of providing data on request 'in game'.

Additionally, the increasing use of cryptocurrencies in the online gambling space is presenting new and complex challenges, providing greater privacy and anonymity. The rapid growth of this sector, with reports of 337 bets per second¹³ being placed on bitcoin platforms, underscores the urgency of the situation. The use of cryptocurrencies and 'in game' currencies also hinders gamblers from having a real time understanding of how much money they have spent, and lost.

Workarounds being used to circumvent registration and access LIWSP services

Relationships Australia is aware of some common methods by which registrants are circumventing registration to access LIWSP services. These include:

- using alternative email addresses to open accounts; stronger identification measures are essential. We **recommend** that LIWSPs should be subject to a statutory duty to verify identity and prevent access to their services by registered individuals. The imperative to minimise friction when registering with BetStop must be balanced with sufficiently robust identification processes to mitigate the risk of alternative details being used by registrants to open new accounts (eg during the three month period where de-registration is currently excluded). We **recommend** that if a prescribed threshold of matches (with a current registrant's details) is met, then an account cannot be opened or used until it is affirmatively established, by the LIWSP, that the customer is not currently registered using a different account. (**Recommendation 1**)
- account sharing – third party gambling is hard to track, and our practitioners have observed account sharing/borrowing to circumvent registration. Clients may rely on friends, family or even acquaintances to place bets on their behalf. This may start with seemingly small amounts, like \$25 increments,¹⁴ and may escalate over time. It would be useful to explore whether the Register could incorporate tools to detect suspicious activity, along the lines of those used by Austrac to monitor large numbers of low value transactions to identify child sexual exploitation and abuse.
- using unregulated platforms – our clients report finding these platforms through online searches, social media, or word of mouth. The anonymity and accessibility of these sites make them particularly appealing to those trying to avoid restrictions

Case study – phone a friend and keep transactions low value

¹³ See <https://news.bitcoin.com/bitcoin-gamblers-wagered-4-5-billion-btc-2014/>

¹⁴ Small increment gambling may be a form of minimising. Many clients will tell themselves that there is no problem, because they are only betting \$25 at a time. This allows them to continue the behaviour without feeling the full weight of the gambling harms.

Our client registered with BetStop. Later, to bypass his self-exclusion, he logs into online betting sites using the accounts of three friends. Once logged in, he deposits money using PayID, and ensuring transactions stay under \$200. He believes keeping transactions small helps him avoid detection. This method allows him to continue betting online despite self-excluding. He acknowledges that if this loophole were closed, it would help him stop gambling.

We find that these trends undermine the effectiveness of self-exclusion programs, which are designed to provide a crucial safety net for vulnerable individuals. In operating our GHS, we seek to address these workarounds and help clients to understand the underlying patterns of their behaviour.

Mismatch between revenue raised from people experiencing gambling harms and investment in harm prevention and minimisation

Relationships Australia **recommends** that Australian governments invest in harm minimisation services in a quantum that is proportionate to gambling revenue realised by those governments and should reflect the cost of gambling harms borne by individuals, families and communities. **(Recommendation 2)**

Despite the reliance in this Act and elsewhere on the existence and accessibility of support services to prevent and remediate gambling harms, there is a vast disparity between the need for GHS and the funding provided to offer these services.

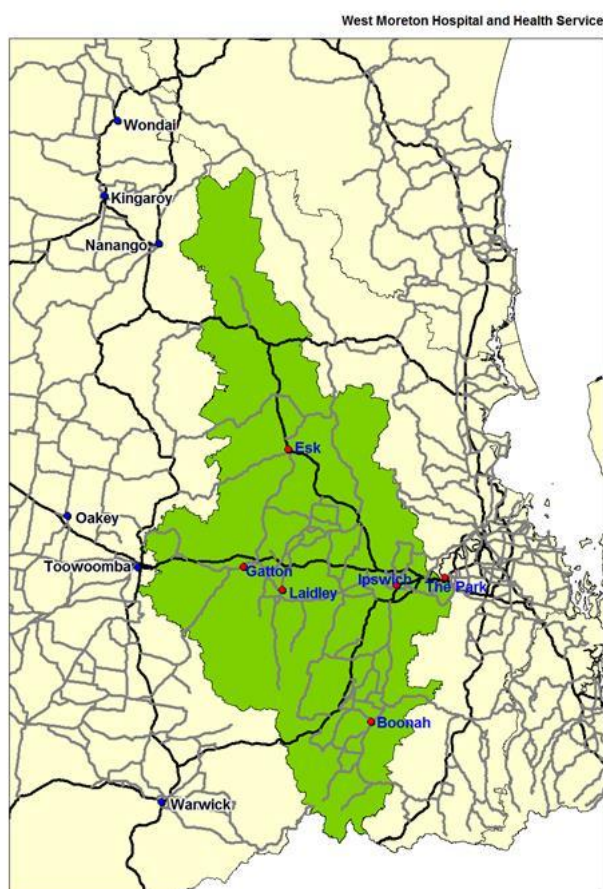
Yet without timely access to high quality, evidence-based therapeutic services to address patterns of behaviour linked to gambling harms, BetStop becomes a temporary, and highly porous, band aid. It can only achieve durable change in people's lives if they can access ongoing GHS and other relevant services. Government investment in these, however, is miniscule relative to the revenue that governments receive from gambling, spotlighting the kind of conflict of interest that in earlier decades stultified tobacco reforms.

In the 2022-23 financial year, for example, the ratio of gambling tax revenue to investment in gambling harm minimisation services was:

- Queensland - 0.6%
- New South Wales - 1.1%, and
- Victoria - 1.9%.

Queensland case study¹⁵

In the West Moreton region, Relationships Australia Queensland is funded to employ 2.8 FTE to provide counselling and GHS Community Education across a region including more than 320,000 people in the Somerset, Scenic Rim, Lockyer Valley and Ipswich communities. Until 1 April, RAQ was funded only to provide 1.8FTE. Even with this (very welcome) increase, the headcount remains inadequate to engage with schools, health services and vulnerable community groups.



The average wait time before calls to the Queensland GHL are abandoned is just over a minute and can be as little as 10 seconds – 10 seconds that could be the difference between life and death, given the correlation to suicide. Further, clients have to wait to see a Gambling Help Counsellor. Long wait times for helpline assistance, inadequate online resources, and delayed access to counselling exacerbate the crisis, amplifying risks of suicide, familial breakdowns, and mental health struggles.

¹⁵ RAQ GHS funding is based on Queensland Health regions. Statistics are based on land based, not online, gambling.

Low awareness of the Register

Even among GHS clients, our practitioners report that the awareness of the Register is low. Anecdotally, many clients discover BetStop only after experiencing significant gambling harm and seeking help.

In addition to low awareness of the Register itself, it appears to our practitioners that our clients would benefit from clearer, and more actively promoted, information about options to vary registration periods, as well as information about the consequences of early removal from the Register. We are also uncertain whether the requirement that registrants seek support before de-registering is being effectively and credibly enforced.

Marketing to registrants

Clients who have registered to self-exclude report that they continue to receive marketing approaches during their period of registration. For example, clients have reported receiving and using birthday offers that fall within their registration periods.

Cost recovery is insufficient to support effective regulation and necessary support services

We support recovery of costs of the Register from an industry that is profiting from harmful gambling.

However, we are not yet satisfied that enforcement action is sufficiently robust, or publicly known, to act as an effective incentive for LIWSPs to stop predatory and exploitative behaviour. This underlines why robust and well-resourced regulatory activity, including the appropriate use of civil penalty and offence provisions, is critically important to achieving policy objectives around harm prevention and minimisation. Accordingly, perhaps taxes, rather than levies, are required. Enhanced taxation measures on LIWSPs could be used not only to fund the regulator adequately, but also to bridge the yawning chasm between government investment in GHS and the need for support services for registered individuals, and others experiencing gambling harms (including children and young people). Support services are needed – and should be funded proportionately to the revenue governments receive from gambling, and to the prevalence of gambling harms in the community. (See **Recommendation 2**)

We further **recommend** that the ACMA should have the power to order refunds and redress, in addition to its regulatory powers, and that the Act create a statutory cause of action for individuals harmed by breaches of their duties by LIWSPs. (**Recommendation 3**)

Protecting children and young people from gambling harms

Currently, a person needs to be 18 years old to register on BetStop and a third party cannot register on behalf of someone else. Presumably, the policy assumption is that, for persons under 18, parents will be in a position to control exposure to gambling harms. Relationships Australia is concerned that, in response to tougher regulation in relation to adult gambling,

LIWSPs will accelerate and intensify their (currently unregulated) efforts to groom children and young people, and embed gambling in their lives.¹⁶ A lack of regulation premised on the illegality of underage gambling means an absence of protection. From a pragmatic, public health-informed perspective, regulation needs to acknowledge that under-age gambling is happening and that LIWSPs, like the tobacco companies a few decades ago, view Australia's children and young people as soft (and lucrative) targets to constitute a future market.

Gambling among children and young people – prevalence and regulatory responses

The Government is to be commended for its concern that children and young people are exposed to serious risks through social media. Age verification for access to social media, however, will not address the current serious risks that children and young people are exposed to through engagement with online gaming and gambling like activities.

By the time a young person turns 18, they have already been groomed and may already be suffering gambling harm.¹⁷ Increasing numbers of children and young people are both engaging in gambling-like activities and gambling with money (Greer, Boyle & Jenkinson, 2022; Saunders & Harrington, 2025). Unsurprisingly, their losses are also increasing.

The research literature confirms our practitioners' observations that young people are particularly vulnerable to online gambling.¹⁸ Games that simulate a gambling activity are easily accessible through sites such as Facebook, Twitter/X and YouTube, as well as through free apps. Children are increasingly exposed to, and interact with, gambling themes, brands and games because of the difficulties in age-gating social networking sites. Gaming loot boxes are a good example, as features of online games that are available to users regardless of age.

Case study – loot boxes

In reviewing the evidence on harms associated with loot boxes, simulated gambling and other in-game purchases in video games, the AGRC concluded that

...research has found loot box purchasing to be associated with higher gambling frequency, expenditure, and session length, as well as positive attitudes towards gambling and future intentions to gamble with money.¹⁹ [references omitted]

The AGRC noted that in qualitative interviews, adult loot box purchasers

...expressed concerns that loot boxes may be attractive and harmful to a young (underage) market. Participants also described risky features of loot boxes,

¹⁶ Research indicates that gambling habits acquired under the age of 18 are likely to persist at least into the mid-20s: see, eg, Saunders & Harrington, 2025.

¹⁷ See, eg, Derevensky et al, 2021;

¹⁸ See, eg, Greer et al, 2022.

¹⁹ Greer et al, 2022, 10, 17-25. The research considered included Australian and international research.

including continual availability, unknown cost of chasing desired items,²⁰ addictive potential, prolific in-game promotions, low cost per transaction facilitating continued purchasing, easy access to minors, and lack of consumer protection features (ie age restrictions, odds information, responsible gambling tools).²¹

Indeed, Greer et al note evidence suggesting that the association between loot box spending and gambling problems may be stronger for older adolescents than for adults²² and that having purchased a loot box was the strongest predictor of gambling problems and gambling-related harms (including development of internet gaming disorder, increased psychological distress and financial harm),²³ including for adolescents between 12-17 years of age (ie an age group many members of which would have access to materials classified M or MA15+).²⁴ Social, non-monetary casino games have proven among the most popular with young people. Although these games are largely free to play, money can be used to further their play, and the accurate replication of gambling activities and environments (including, for example, aesthetics, music tracks, sound prompts etc) grooms young people for future engagement with the money driven counterparts.²⁵ The AGRC has identified associations between in-game purchases and internet gaming disorder, financial harms, and behavioural and emotional problems in adolescents.

Classification policy

In our submission on mandatory minimum classifications for gambling-like content in computer games, we recommended that the National Classification Code be amended to include an additional principle that minors should be protected from material that normalises, or is likely to normalise gambling, and that in-game purchases linked to elements of chance and simulated gambling should *not* be permitted in respect of the G, PG, M and MA15+ classification categories. While Relationships Australia welcomed the mandatory minimum R18+ classification for games containing simulated gambling, we were disappointed that the Government did not act to impose the same mandatory minimum classification for games containing in-game

²⁰ See, eg, Deblaquiere, Carroll and Jenkinson, 2018, for the emergence of a market in rare or otherwise desirable items that may be acquired through purchasing and opening loot boxes. Some may enable in-game progression, or be aesthetically desirable, as well as being 'intrinsically valuable' within the terms of the game.

²¹ Greer et al, 2022, at 23, citing Hing et al, 2021.

²² Greer et al, 2022, at 23, citing Hing et al, 2021; Kristiansen & Severin, 2020; Wardle & Zendle, 2021.

²³ Sakata et al, 2022.

²⁴ Greer et al, 2022, at 25, citing Rockloff et al, 2020.

²⁵ See also Greer et al, 2022, 37, 45 (esp Table 6); Sakata & Jenkinson, 2022; AIFS submission to the House of Representatives Standing Committee on Social Policy and Legal Affairs, 11 November 2022 (submission 76), available at

https://www.aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlinegamb lingimpacts/Submissions (accessed 30 May 2023), and sources cited as showing association between loot boxes and social casino games with harm such as problem, gambling, internet gaming disorder and other negative consequences. See also Livingstone, 2017, and King & Delfabbro, 2018, cited in the submission.

purchases linked to elements of chance. Imposition merely of a mandatory M classification does not align with the clear evidence about the harms and risks of harm borne by such games.

Advertising

We believe that online gambling is further normalised for young people through the number, frequency and intensity of advertisements. Many of our younger clients tell us that they have seen advertising or branding for gambling operators on social networking sites, including content shared by other users.²⁶ Children and young people have a particular susceptibility to being influenced by gambling advertising.²⁷ Social casino games incorporate components such as leaderboards and competitions, linking to social media accounts, and dark patterns including freemiums, confirmshaming and paid downloadable content to access appealing features (Playing the Player, 2025). Users are encouraged to share updates and invite their online connections to play, increasing the promotion of gambling-themed games on social media. Gambling providers also exploit the use of memes, to encourage young people to tag their friends, in a manner which closely resembles pyramid scheme tactics.

Gambling-themed games increase our clients' confidence in winning at gambling and alter perceptions of skill and risk-taking. Many of our younger clients report that game operators press them to try real-money gambling. Many have gone on to gambling, and to suffer gambling-related harms, as a result of using social casino games. To young people who have been painstakingly groomed – at considerable expense by marketers - to engage with online gambling, the ready accessibility of credit to bet eases the transition to monetised gambling without signposting the very real difference in kind and consequence from their childhood games.²⁸

As with adults, online gambling is addictive for young people because it provides distraction and a temporary means of 'self-soothing' when experiencing emotional challenges arising from stress, depression, and anxiety. Self-soothing with online gambling can lead to a disengagement from school and peers and cause conflict in relationships with parents, with the difficulties themselves supporting a self-perpetuating cycle of problematic stress management.

In terms of the normalisation of gambling, and the promotion of gambling, among children and young people, however, there is no question of balancing risks and benefits, or resolving any tension between exercising and restricting autonomy. There is no upside attached to inducing children and young people to start or to practise gambling behaviours. There is only risk of harm, and this is a grave risk of what is too often quite devastating harm that lays waste not only to the life and wellbeing of the person who gambles, but also to their families, friends and the broader community.

²⁶ See O'Brien & Iqbal, 2019.

²⁷ Derevensky et al, 2010.

²⁸ Consequently, Relationships Australia welcomed the Government's moves to ban the use of credit cards for online wagering.

Australia has the largest per capita gambling losses,²⁹ and among those Australians who gamble, 46% are at some risk of gambling harm.³⁰ The child or young person who transitions to adulthood with gambling a well-established part of their lives is an adult who lives with numerous risks. These include the risk of using domestic and family violence³¹ (including abuse and neglect of older people,³² as well as intimate partner violence). If that child or young person becomes an adult living with a mental illness, their risk of experiencing gambling harms is greater.³³ If they become an adult experiencing family separation, they are more likely also to experience other psycho-social challenges as well as needing intervention by a family court to resolve disputes about arrangements for their children.³⁴ The cost of gambling harms, therefore, burdens our health system, our social welfare system, our criminal justice, family violence and family law systems.

If these risks materialise, they can have grave and persistent effects that endure well into adulthood and can, potentially, have intergenerational effects.³⁵ There is no countervailing benefit that mitigates the harm. Yet the risks of premature exposure to gambling are entirely avoidable, and within the Government's power to avoid.

The evidence base (as well as practice experience) emphasises the harms to which children and young people are exposed not only through simulated gambling, but also through in-game purchases linked to elements of chance.

By virtue of the M mandatory classification for games with in-game purchases linked to elements of chance, and lengthy delays in implementing recommendations from *You win some, you lose more*, the Government has guaranteed that people under the age of 18 are exposed to gambling, predatory and ubiquitous gambling advertising, and gambling-like behaviour, and thus to the serious and persistent risks of gambling harms. This is despite the compelling evidence that young people are being harmed, and at risk of further harm when they turn 18 and all forms of gambling are open to them. It is therefore incumbent on the Government to provide mechanisms by which parents and caregivers, and young people accessing M content, can exclude access to such activities.

Relationships Australia **recommends** that the Commonwealth implement the recommendations from the *You win some, you lose more report (2023)* as a matter of urgency, and as part of a cohesive package of reforms that includes implementation of recommendations made in the

²⁹ Letts, 2018, QGSO, 2021.

³⁰ Participation and experience snapshot, 2023.

³¹ See, eg, Hing et al, 2020 (finding that while gambling does not directly cause intimate partner violence, it reinforces the gendered drivers of violence to intensify the frequency and severity of intimate partner violence against women); Freytag et al, 2020.

³² Qu et al, 2020.

³³ See, eg, Lubman et al 2017.

³⁴ Family Law Council, 2015, 4, citing Kaspiew and Qu, 2014.

³⁵ The AGRC has noted that children and young people are at greater risks of harm if they have a parent who gambles: Sakata & Jenkinson, 2022.

Report of the Statutory Review of the Online Safety Act 2021 (the Rickard Report),³⁶ to mitigate against fragmentation of regulation of online activities involving end-users in Australia.

(Recommendation 4)

Relationships Australia further **recommends** that Governments should use all available legislative, policy and program levers to:

- prevent the inter-generational normalisation of gambling, including through advertising, as a preferred means of solo and communal leisure activity
- prevent under age gambling (including through reforms of the *Online Safety Act 2021* and the National Classification Scheme)
- prevent gambling providers from advertising in spaces (including online spaces) accessible to children and young people (consistent with the *You win some, you lose more* report)
- prevent exposure to aggressive and predatory marketing by LIWSPs, including through dark patterns³⁷
- identify under age gambling where it is occurring, and intervene early to minimise financial losses and other gambling harms (including to educational and employment engagement, family relationships and social connection)
- offer non-stigmatising, timely and accessible pathways for children and young people to seek and receive help to address harmful gambling behaviours
- offer accessible pathways for carers of children to bar children's access to gambling and gambling-like activities³⁸
- explore accessible pathways for children and young people to self-exclude, and
- effectively counter narratives, appealing to children and adults alike, which link gambling and gambling-like activities to fulfilling intimate and social relationships, and narratives that position gambling as an innocuous 'little treat', 'self-care', or as a pathway to profitable side hustles. **(Recommendation 5)**

Extension of register to include online keno product services and operators

Regulation needs to keep up with changing technologies, and technologies are evolving at an increasing pace. Unregulated expansion of online gambling is not consistent with the public health goal of reducing harm from gambling. Regulation needs to be anchored to a more nuanced understanding of the nature of online gambling and its prevalence, adaptability to changing technologies, and evidence about effective interventions. Opportunities to gamble on keno within Australia are increasingly moving online. The size of the market for this product is

³⁶ Available at https://www.aph.gov.au/Parliamentary_Business/Tabled_Documents/9184

³⁷ See, eg, *Playing the Player*, 2025; Pitt et al, 2024; Backholer & Pathirana, 2024.

³⁸ 'Gambling-like' activities include activities in online games such as loot boxes, skin betting, certain kinds of scarcity cues, earned battle passes: Gupta et al, 2025. In respect of loot boxes, Gupta et al, 2025, note that the regulation of randomisation of rewards for electronic gaming machines (pokies) is entirely absent in digital gaming (see p 44).

growing, at the same time as the growth of foreign matched lotteries. While engagement in Keno and Lotto has always been viewed as “less harmful” than other forms of gambling, the increase in online opportunities has increased the risk that those engaging with these products in an online environment will experience harm. This is especially as result of the increasing exposure to products, especially among vulnerable cohorts including children and young men. For example, KenoGO is now available at KenoGO.com.au, where a person can play every three minutes, 24 hours a day, 7 days a week. The motto with KenoGO, is “With KenoGo the excitement never ends”.

There is a popular argument that these forms of gambling are not as harmful as sports betting or casino games, which has meant that regulation of these forms of gambling has not occurred at the same pace as for others. We suggest that this argument is weak, and increasingly masks the significant risk posed by these products. As the government focuses more on early intervention strategies to prevent occurrences of gambling harm, we suggest that targeting emerging products before they become more harmful should be a priority. By regulating now, and addressing the ease with which such products are accessed, governments can avoid the challenges experienced when implementing previous interventions, which often come too late for the many lives that have been impacted. Relationships Australia notes developments in recent years, including the implementation of a range of critical preventative measures (including the ban on use of credit). However, a consistent and fearless commitment to action is necessary to ensure the regulatory framework remains appropriate in response to emerging technologies and products.

Relationships Australia practitioners have shared with the National Office a number of examples of clients who experienced harm as a result of engagement with keno/ foreign matched lottery products. Some clients report moving to keno/ scratchies/ lottery after stopping gambling on EGM or sports betting as they believe that these are safer forms of gambling. Many reported subsequently finding themselves in a similar cycle to online sports betting. This resulted in them:

- spending more than they planned
- spending more time engaging with the product on mobile devices
- chasing losses and being enticed to continue playing after experiencing “near misses”.

In addition, the limited regulation of these products has led to significant issues with the non-payment of legitimate winnings. Customers who have managed to achieve rare winning outcomes have found themselves unable to access their rightful prizes, further compounding the financial and psychological harm they have suffered.

Client story: "They wouldn't release her money for 24 hours"

Our client was a woman in her forties who had recently lost her highly paid fly in/fly out mining job. When working, she gambled at a high level because she had an income that could maintain it. The client told us she gambled on a site that offered mostly casino games. After losing her job, she had difficulties in containing her gambling activity. She said that, when she did have a win, the site refused to payout for twenty-four hours, by which time she had always gambled again. She said that if she had received the money immediately, she might not have. The counsellor looked at the web site, discovered that it was run overseas, and inferred that the site was not subject to Australian Law.

These adverse experiences are not isolated incidents but rather a systemic problem that demands urgent regulation. The existing framework has proven inadequate in protecting consumers from the predatory practices of the online gambling industry, and stronger measures are necessary to safeguard the financial and emotional wellbeing of individuals and families.

Harm minimisation alone is no longer a sufficient strategy – as government has acknowledged in its acceptance of the 'digital duty of care' recommendation in the Rickard Report. We have reached a critical juncture where the focus must shift to prevention. A comprehensive public health approach is essential; one that prioritises early intervention and proactive measures to reduce the onset, causes, and recurrence of gambling-related harms. We **recommend** that this preventative strategy must encompass a range of targeted initiatives:

- support services for individuals and families experiencing low levels of harm: Providing early intervention and support services can help prevent the escalation of gambling and mitigate the potential for more severe harms.
- technological restrictions on access: Leveraging available technological solutions to limit access to foreign matched lottery and online keno products, especially for vulnerable populations, and
- whole-of-government approach: Exploring the potential to leverage the regulatory powers of the Office of the eSafety Commissioner, or another suitable agency, as part of a coordinated, whole-of-government strategy, could significantly enhance the ability to address the proliferation of online gambling harms. (**Recommendation 6**)

Relationships Australia urges the Government to prioritise the implementation of these comprehensive harm prevention measures, recognising that a proactive, public health-focused strategy is essential to safeguarding the wellbeing of individuals, families, and communities in the face of the growing risks posed by online lottery and keno products. We recommend that the Register should be extended to include online keno product services and operators. (**Recommendation 7**)

Conclusion

The expansion in exposure to, and availability of, online gambling has been rapid and sustained; a no doubt intentional outcome of the staggering increase in the amount of money spent on wagering advertising during Covid-19 lockdowns, and since that time.³⁹ The place of online gambling in our society is a contentious, emotive issue. The regulation of online gambling can be considered on a continuum from maximum consumer choice to prohibition, largely with a moral dimension to arguments. In preventing and minimising online gambling-related harm, we recognise that no single strategy (including BetStop) could ever be totally comprehensive. However much is achieved, there is always more that can be attempted.

Our recommendations rest on the principle that responsibility for population health is a shared responsibility, conferring both freedoms and obligations on individuals, community groups, businesses, corporations and governments at all levels. This responsibility is even greater in respect of children and young people. We are deeply concerned, too, that as regulation to protect adults becomes more robust, gambling providers will increasingly target children and young people in a context which is largely unregulated because underage gambling is illegal. In general, we adopt a harm minimisation approach, accommodating what we believe to be personal and socially responsible online gambling practice and policy that balances the rights of adults to safely access legal online gambling opportunities against the need to prevent, minimise and mitigate harms associated with online gambling.

The agility with which gambling providers identify and exploit loopholes in regulation reveals the critical need for government to maintain vigilance and exercise its own agility to respond to gaps in regulation. We therefore welcome the government's attention to this issue and strongly urge quick and decisive action to close the loopholes and address the harms identified above.

There is strong community support for gambling law reform. Community attitudes about gambling, including gambling harms and the ubiquity of gambling, are strongly in favour of robust regulation of gambling. The Australian Gambling Research Centre has recently found that

Most Australians believed that there were 'too many opportunities for gambling nowadays' (77%) that gambling is 'dangerous for family life' (68%), and gambling 'should be discouraged' (59%).⁴⁰ [italics in original]

AGRC also found widespread concern that the ubiquity of gambling advertising 'normalises gambling among children'.⁴¹ [italics in original]

³⁹ AGRC Community attitudes snapshot, March 2023, citing the Victorian Responsible Gaming Foundation, 2022.

⁴⁰ AGRC Community attitudes snapshot, March 2023.

⁴¹ AGRC Community attitudes snapshot, March 2023; see also AGRC advertising attitudes snapshot, noting concerns that gambling advertising targets people at risk of gambling harms and encourages uptake of gambling – both concerns are pertinent to community attitudes about protecting minors from harm.

Thank you again for the opportunity to participate in this consultation. Should you require any clarification of any aspect of this submission, or information on the services that Relationships Australia provides, please contact me or Dr Susan Cochrane, National Policy Manager, Relationships Australia (ntebbey@relationships.org.au and scochrane@relationships.org.au). We look forward to future opportunities to engage with you as the Review progresses.

Kind regards

A handwritten signature in black ink, appearing to read 'Nick Tebbey', with a stylized flourish at the end.

Nick Tebbey
National Executive Officer

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