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National Consumer Protection Framework for Online Wagering Evaluation: Phase 1

Post-Implementation review and process evaluation – final report

Australian Gambling Research Centre



Sensitive content warning

This content discusses gambling harm, if you or someone you know is experiencing gambling-related issues, call Gambling Help on 1800 858 858 or visit the website to chat with a trained professional online.

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The Australian Gambling Research Centre (AGRC) was established under the Commonwealth *Gambling Measures Act 2012*. Our gambling research program reflects the Act, embodies a national perspective and has a strong family focus. Our work forms part of the functions of the Australian Institute of Family Studies (AIFS).

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The Australian Institute of Family Studies acknowledges the Traditional Owners of Country throughout Australia and recognises their continuing connection to lands and waters. We pay our respects to Aboriginal and Torres Strait Islander cultures, and to Elders past and present.

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Abbreviations and key terms

Term/acronym	Description
ACMA	Australian Communications and Media Authority
AGRC	Australian Gambling Research Centre
AIFS	Australian Institute of Family Studies
AML/CTF Act	Anti-Money Laundering and Counter-Terrorism Financing Act
AUSTRAC	Australian Transaction Reports and Analysis Centre
BETA	The Behavioural Economics Team of the Australian Government
CGM	Consistent gambling messaging
DITRDCSA	Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
DSS	Australian Government Department of Social Services
EWG	NCPF Evaluation Working Group
FCA	Financial Counselling Australia
Gambling	Gambling covers both wagering and gaming
Gaming	Gaming is focused on playing games of chance for money or something else of value
HREC	Human Research Ethics Committee
GHO	Gambling Help Online
IGA	Interactive Gambling Act
IGC	Implementation Governance Committee
Illegal offshore wagering	Refers to the provision of illegal wagering services by operators based in overseas jurisdictions to Australian residents. Illegal wagering services can include prohibited services under the IGA (such as interactive gaming or in-play betting) or services prohibited under state and territory laws. (Department of Social Services, 2017)
IT	Information technology
NCPF	National Consumer Protection Framework for Online Wagering in Australia
NPS	National Policy Statement
NSER	The National Self Exclusion Register (BetStop)
NTRWC	Northern Territory Racing and Wagering Commission
OLGR	Office of Liquor and Gaming Regulation, Queensland
Platform	The mechanism (such as an app or website) where wagering operators enable users to place bets and interact with their accounts
PIR	Post-implementation review
PoC	Point of Consumption: a regulatory system where a jurisdiction applies regulations to all WSPs offering services to residents of the jurisdiction
PoS	Point of Supply: a regulatory system where a jurisdiction applies regulations only to the wagering service providers licensed by that jurisdiction
PRES	Performance, Review and Evaluation Strategy
QGSO	Queensland Government Statistician's Office
RIS	Regulatory impact statement
SACC	Small amount credit contract
SOWG	Senior Officials Working Group
TAB	Totalisator Agency Board
ToC	Theory of change
UKGC	United Kingdom Gambling Commission
VGCCC	Victorian Gambling and Casino Control Commission
Wagering	Wagering is focused on a bet on an event or contingency. In a wager, the bettor usually does not participate in the actual event or contingency.

Term/acronym	Description
WSPs	Wagering Service Providers

Executive summary

The National Consumer Protection Framework (NCPF) aims to establish nationally consistent minimum protections for online wagerers. Ministers from all Australian jurisdictions committed to the NCPF in November 2018. The NCPF plays a critical role in preventing and minimising harm from online gambling and is an important first step in inter-jurisdictional cooperation. Australian governments, community organisations, individuals affected by gambling harm and the online wagering service industry have contributed significant effort and resources towards the implementation of the NCPF.

On behalf of all governments, the Department of Social Services (DSS) commissioned the Australian Institute of Family Studies (AIFS) to undertake an evaluation of the NCPF. The purpose of the evaluation is to:

1. assess the effectiveness of the measures in achieving outcomes
2. detect unintended consequences
3. identify weakness in the regulatory framework
4. inform ongoing refinements to the measures.

The evaluation is being undertaken in 2 parts: Phase 1 is a post-implementation review and process evaluation to assess whether the measures were implemented as intended, and Phase 2 is an evaluation of the impacts of the NCPF in achieving its intended outcomes. This report presents the findings of Phase 1. Phase 2 has commenced and is due to be completed by June 2027.

The Phase 1 evaluation of the NPCF found that:

- The measures were mostly implemented as intended and offered generally consistent protection across jurisdictions.
- It took nearly 6 years for all measures in the NCPF to be implemented, rather than the planned 18 months, with the original implementation time frame found to be not realistic.
- The reasons for delays included COVID-19 disruptions, the former provider for the National Self-Exclusion Register (NSER) going into voluntary administration and the need to develop and pass new legislation in some jurisdictions. Additionally, some measures were complex and needed trialling and testing of their designs and the development of information technology (IT) to be operationalised.

The evaluation has also found that:

- Policies in some jurisdictions relating to 5 measures need to be adjusted where they deviate from the NCPF principles. These measures are restrictions on inducements, account closure, deposit limits, activity statements and consistent gambling messaging (CGM).
- The NCPF can be promoted more to encourage uptake of its protective measures.
- Regular, coordinated and proactive activities supported by penalties that deter non-compliant behaviour are needed and should be adequately resourced.

Phase 2 will conduct an impact evaluation of the 10 measures, assessing changes in online wagering behaviour and related harm attributable to the NCPF. It will also provide further recommendations to refine and improve the measures. Given the extended and uneven implementation of NCPF measures and limited baseline data, Phase 2 will adopt a cautious, contribution-based approach to assessing change, drawing on multiple data sources and a longer time series.

The recommendations in this Phase 1 report can enhance the national consumer protections for online wagering. Timely action on these recommendations will further build the protective capacity of the NCPF and support a safer online wagering environment for Australians.

Australian governments are encouraged to quickly convene and consider the recommendations of the Phase 1 evaluation report. As with the initial implementation of the NCPF, refining the measures and the framework will take effort and resources from all jurisdictions.

Key findings and recommendations

Recommendations have been colour coded and initialled to indicate those recommendations that relate to:

- **changes** needed to meet NCPF principles (C), such as undertaking the feasibility study into the multi-operator precommitment scheme specified in the National Policy Statement (NPS) (3 recommendations)
- **refinement** to measures (R), such as nationally consistent activity statements, and supporting infrastructure within the current framework, such as regular, coordinated and proactive compliance activities (13 recommendations)
- **new** policy (N), such as harmonising penalty regimes (5 recommendations).

Implementation and timeliness

Key findings

- The 10 NCPF measures were all implemented between February 2018 (pre-NPS) and September 2024, significantly longer than the expected 18-month implementation period stated in the NPS.
- A feasibility study into a centralised pre-commitment scheme (across operators) was supposed to be commissioned by the DSS but remains outstanding.
- Implementation delays across the 10 NCPF measures were due to the complexity in technical design of some of the measures, COVID-19 disruptions, the need for legislative changes across jurisdictions and the former provider for the National Self Exclusion Register (NSER) going into voluntary administration.
- Only the Australian Government measures had formal embedded review mechanisms, outside the NCPF evaluation. Some jurisdictions nevertheless undertook reviews and refinements of specific measures.
- Delays in implementing the full set of NCPF measures led to delays in their evaluation, which, in turn, deferred opportunities to refine them. The NPS lacked a mechanism to adjust the evaluation's timing or scope, reducing flexibility to support decision making.

Promotion, education, awareness and uptake

Key findings

- Promotion and education of the NCPF measures by governments and Wagering Service Providers (WSPs) have been limited. Awareness of the measures is generally low, especially for measures that WSPs are not required to actively promote under the framework.
- There is low uptake of measures that require customer activation (e.g. deposit limits, account closure and NSER registration). Use of activity statements that require customer engagement is also low.
- There is agreement from WSPs, consumers and a key harm advocacy body about the need for more promotion and education of the measures.

Recommendations

Recommendation 1a: (R) Regular whole-of-community awareness campaigns should be conducted to promote the NCPF, with supplementary campaigns targeted towards high-risk consumers explaining how consumers can activate and engage with measures.

Recommendation 1b: (R) Regular education campaigns should be conducted to promote the NCPF and how consumers can activate and engage with the NCPF measures. These campaigns should focus on health professionals, financial counsellors, bank employees and frontline assistance workers so they can direct clients to the NCPF measures.

Recommendation 1c: (R) Promotion and education campaigns should be evaluated to measure their effectiveness at increasing consumer awareness and engagement with the NCPF.

Recommendation 1d: (R) Australian governments should ensure fact sheets and guides for consumers explaining how the NCPF tools work and the protection they offer are available online on help-providing sites and other channels. These fact sheets should include advice on how consumers can make complaints if they are concerned that WSPs are not compliant with the NCPF measures.

Compliance and enforcement

Key findings

- There has been limited regulatory compliance monitoring for the NCPF measures. Responding to customer complaints is the main form of compliance activity.
- Proactive compliance activity by regulators specifically targeting the NCPF measures may be limited by insufficient resourcing and/or prioritisation of compliance activities in the liquor, tobacco or land-based gambling sectors.
- Investigated complaints mainly involved direct marketing to opted-out customers, inducements for opening an online wagering account, inadequate account closure processes and failures by WSP staff to respond to red flag gambling behaviours.
- Regulators reported facing challenges gathering information from WSPs to ensure they were complying with the legislative framework requirements. The time taken by regulators to resolve customer complaint investigations was often significant.
- WSPs noted that jurisdictional legislative inconsistencies place a compliance burden on them, with this burden potentially falling more heavily on smaller WSPs.
- Enforcement penalties for breaches of the NCPF measures vary significantly between jurisdictions. Both Point of Consumption and Point of Supply regulation for the NCPF measures do not exist in every jurisdiction, creating a barrier to compliance actions being undertaken in some jurisdictions.

Recommendations

Recommendation 2a: (R) Regulators should undertake regular, coordinated and proactive compliance activities to ensure systemic non-compliance does not occur.

Recommendation 2b: (R) Regulators should provide timely and public reporting on their activities, including any penalties issued.

Recommendation 2c: (R) The Australian, state and territory governments should mandate that WSPs provide timely, reliable and detailed information that supports compliance, evaluation and policy development activities.

Recommendation 2d: (L) State and territory governments should harmonise their penalty regimes, including setting penalty levels to act as a deterrent for non-compliance with legislation. All jurisdictions should review the length of time available to undertake investigations and prosecutions. This would require legislative change.

Recommendation 2e: (L) State and territory governments should adopt a Point of Consumption regulatory approach to enhance the consumer protections offered by the NCPF measures and the framework, so all Australian consumers have a consistent minimum level of protection. This would require legislative change.

Recommendation 2f: (L) The Australian, state and territory governments should review funding to regulators to ensure compliance activities are sufficient to protect consumers from gambling risk and harm.

Measure protection and consistency

Key findings

- The NPS consists of 71 principles across the 10 measures. All measures were implemented with a high degree of consistency across jurisdictions in their timing and features. Six of the measures (restrictions on credit and payday lenders, customer verification, CGM, staff training and the NSER) were implemented consistent with the NCPF principles, although staff training and the NSER did not meet the 18-month implementation time frame.
- Implementation of the other 4 measures (restrictions on inducements, account closure, deposit limits and activity statements) aligned with their related NCPF principles, with the exception of 6 principles. These were principles 15, 17, 24, 35, 38 and 47 (as numbered in this report). The wording for 5 of these principles was ambiguous and there was oversight around the detail of one principle. This resulted in inconsistent guidance between jurisdictions. One principle was not actioned, namely a feasibility study for a centralised pre-commitment system to be commissioned and considered by governments. A centralised deposit limit scheme would enable wagerers to set a deposit limit that applied across all online WSPs.
- WSPs have not aligned their implementation of CGM with that measure's full guidance. Where there was inconsistent implementation across jurisdictions, this resulted in inconsistent levels of protection provided to consumers.
- State and territory governments should improve the consistency of measures by aligning legislation, regulations and operational guidance to ensure all Australian consumers receive the same minimum level of protection.

The following section of this evaluation provides findings and recommendations for 5 of the 10 measures aimed at improving both consistency and the level of protection offered. The involvement of the Australian Government may assist with coordination.

Restrictions on inducements: key findings

- Jurisdictions interpret inducements differently, with several providing consumer protections that are stronger than the NCPF. However, different jurisdictional interpretations may result in minimum consumer protections varying across states and territories.
- This inconsistency means there are differences in permitted behaviour depending on the geographic location of the consumer. This problem will require active management as the wagering industry introduces new types of inducements.
- Some WSPs require customers to consent to direct marketing to open an account, undermining the intended model. Victoria, SA and WA resolved this in their legislation but other jurisdictions have not yet addressed this issue.

Recommendations

Recommendation 3a: (⋒) Australian and state and territory government policy makers and regulators should work together to adopt consistent definitions of online wagering inducements, including for any new types of inducements introduced by wagering operators, to be reflected in legislation as appropriate.

Recommendation 3b: (⋒) State and territory policy makers should explore and work toward increased consistency in restrictions on offers of inducements, given some jurisdictions already have stronger protections.

Recommendation 3c: (C) State and territory policy makers and regulators should adopt a national model that ensures direct marketing may only be sent to customers who have provided their express consent to receive this material and that all customers can open online wagering accounts without needing to consent to direct marketing.

Recommendation 3d: (R) State and territory policy makers and regulators should adopt a nationally consistent requirement that WSPs cease sending direct marketing materials immediately upon receipt of an unsubscribe request, with a consistent maximum time frame to accommodate processing.

Account closure: key findings

There is a lack of national consistency in the length of time WSPs have to stop sending direct marketing materials to consumers after they receive the unsubscribe request from consumers. Regulators and consumers reported WSPs continued to send direct marketing materials to consumers after they had closed their accounts and that consumers could easily re-open their account. Consumers also reported experiencing confusion around account closure, account suspension, self-exclusion and the ‘take-a-break’ consumer protection tools offered by WSPs.

Recommendations

Recommendation 4a: (R) State and territory policy makers should adopt a nationally consistent model of account closure where the account is completely closed and not easily recoverable and that this is actioned by WSPs as soon as reasonably practicable, with a consistent maximum time frame to accommodate processing.

Recommendation 4b: (R) State and territory policy makers should agree to provide consistent information to customers about the differences between account closure, account suspension, self-exclusion and taking a break.

Deposit limits: key findings

Jurisdictions have not implemented this measure consistently, with only 2 jurisdictions (ACT and Tas) making it mandatory for WSPs to offer deposit limits for the 4 time periods in the NPS (daily, weekly, fortnightly and monthly).

Recommendations

Recommendation 5a: (C) State and territory policy makers and regulators should align their legislation and guidance to be consistent with the NCPF requirement to make it mandatory for WSPs to offer deposit limits for 4 time periods: daily, weekly, fortnightly and monthly.

Recommendation 5b: (C) The DSS should commission a multi-operator deposit scheme feasibility study.

Activity statements: key findings

- Activity statements offered by WSPs vary significantly from each other and from the Behavioural Economics Team of the Australian Government (BETA) template.[1] Differences include how activity statements present inducements, the font colour applied to wins and losses, and the use of CGM. Stakeholders largely supported greater consistency for this measure.
- Victoria reviewed the activity statement measure shortly after it was implemented and revised its guidance in 2023 to introduce more prescriptive requirements that largely aligned with the BETA model.

Recommendation

Recommendation 6: (R) State and territory policy makers and regulators should adopt nationally consistent and prescriptive requirements for activity statements that align with the modified version of the BETA template and the requirements under the NPS.

Consistent gambling messaging (CGM): key findings

- There were delays in implementing the CGM measure due to a dependency on the completion of 3 research studies commissioned by the DSS to inform its design.
- Additional guidance was provided to WSPs on when the CGM taglines needed to be displayed and the volume and tone at which CGM was to be delivered after the initial implementation of the measure.
- CGM implementation by WSPs is not fully consistent with the guidance provided by jurisdictions. Clarifying this guidance is expected to improve the impact of CGM.
- Consumers were more likely to be aware of and use protective measures when they appeared as calls to action in CGM.

Recommendations

Recommendation 7a: (R) State and territory policy makers and regulators should refine guidance on CGM requirements to support nationally consistent adoption by WSPs.

Recommendation 7b: (R) CGM taglines should place more emphasis on calls to action to encourage greater use of consumer protection tools.

[1] The template currently provided to WSPs has been altered slightly from the original BETA prototype. It is published on the DSS website: Activity Statement Prototype

Conclusions and next steps

The NCPF aims to establish nationally consistent minimum protections for online wagerers for the first time. The Phase 1 evaluation of the NPCF shows that:

- The NCPF can be promoted more to encourage uptake of its protective measures.
- Regular, coordinated and proactive activities supported by penalties that deter non-compliant behaviour are needed and should be adequately resourced.
- Policies in some jurisdictions should be adjusted where they deviate from the NCPF principles.

The recommendations in this report can enhance the national consumer protections for online wagering. Timely action on these recommendations will further build the protective capacity of the NCPF and support a safer online wagering environment for Australians.

Phase 2 will conduct an impact evaluation of the 10 measures, assessing changes in online wagering behaviour and related harm attributable to the NCPF. It will also provide further recommendations to refine and improve the measures.

1. Introduction

The National Policy Statement (NPS) for the National Consumer Protection Framework for Online Wagering in Australia (NCPF) was agreed on by Ministers from all Australian jurisdictions on 26 November 2018 (DSS, 2018).[2] The NCPF, or National Framework, is the overarching policy framework agreed by government to deliver nationally consistent minimum protections for online wagering, including implementation, governance, compliance, promotion and evaluation arrangements. Within that framework, the NPS is the agreed policy document underpinning the framework. There are 10 NCPF measures which are the specific consumer protection tools (e.g. activity statements and account closure requirements).

The NCPF stemmed from recommendations in the O'Farrell Review (O'Farrell, 2015) to develop a national framework and measures to strengthen consumer protection and harm minimisation for people who wager online.

The NCPF was the first time that all jurisdictions had agreed to establish nationally consistent minimum protections for online wagerers. Its objective was to minimise gambling harm related to online wagering activity by providing customers of wagering service providers (WSPs) with minimum consumer protections that are consistent across Australia.

The NCPF consists of 10 consumer protection measures supported by 71 agreed principles. The measures span restrictions on inducements and credit, customer verification, account closure, voluntary pre-commitment (deposit limits), activity statements, consistent gambling messaging (CGM), staff training and the establishment of the National Self-Exclusion Register (NSER – BetStop). Together, these measures are intended to reduce the risk of gambling-related harm by embedding minimum protections in the design, operation and marketing of online wagering services across jurisdictions.

The NCPF is deliberately structured as a minimum-standards approach and was designed to be implemented to dovetail with the wagering frameworks of each participating jurisdiction. While jurisdictions committed to implementing nationally consistent protections, the NPS also allows state and territory governments to adopt stronger regulatory settings, provided these do not undermine the intended operation of the framework. Responsibility for implementing, promoting, monitoring, enforcing and evaluating the measures is shared across Australian, state and territory governments, with different measures falling under Commonwealth or state/territory regulatory frameworks.

Implementing the NCPF required substantial legislative, regulatory and operational change across jurisdictions. This included amendments to primary legislation, the development of guidance and codes of practice, consultation with WSPs, trialling and testing of measures and investment in IT systems. While the NPS envisaged that the measures would be progressively implemented over an 18-month period, actual implementation was over a much longer time frame, with the final measures and refinements coming into effect in 2024.

Purpose and scope of the evaluation

The Department of Social Services commissioned the Australian Gambling Research Centre in the Australian Institute of Family Studies (AIFS) to undertake an evaluation of the NCPF on behalf of all Australian governments.

The purpose of the evaluation is to: 1) assess the effectiveness of the measures in achieving outcomes, 2) detect unintended consequences, 3) identify weakness in the regulatory framework and 4) inform ongoing refinements to the measures.

The evaluation is being undertaken in two parts: Phase 1) a post implementation review and process evaluation to assess whether the measures were implemented as intended, and Phase 2) an evaluation of the impacts of approach measure in achieving intended outcomes. This report presents the findings of Phase 1. Phase 2 has commenced and is due to be completed by June 2027.

This report presents the Phase 1 evaluation of the NCPF. Phase 1 has been designed as a post-implementation review and process evaluation. Its primary purpose is to assess how the framework and its measures were implemented in practice, rather than to determine whether the measures have reduced gambling-related harm.

Specifically, Phase 1 examines:

- whether the NCPF measures were implemented as intended and in line with the principles set out in the NPS
- the timeliness of implementation across jurisdictions
- governance and resourcing arrangements supporting implementation
- consistency of implementation across jurisdictions
- the extent to which the measures have been promoted and communicated
- levels of consumer awareness and uptake of the measures
- approaches to regulatory compliance monitoring and enforcement
- any unintended consequences arising from implementation.

Given the staged and protracted rollout of measures over almost 6 years, variation in the maturity of individual measures and limited baseline and monitoring data for many aspects of the NCPF, Phase 1 does not seek to attribute changes in wagering behaviour or gambling-related harm to the NCPF. Instead, it focuses on understanding implementation fidelity, operational settings and system readiness and identifying areas where the NCPF could be strengthened ahead of any assessment of impact.

All 10 NCPF measures are considered in this report at a whole-of-framework level. More detailed analysis is undertaken for selected measures where the evidence base is strongest and where implementation features most directly affect consumer experience. This includes restrictions on inducements, account closure, deposit limits, activity statements and CGM. Promotion, education, awareness, uptake, compliance and enforcement are examined as cross-cutting system features that apply across the NCPF rather than measure by measure.

Evaluation of the promotion, awareness, uptake, compliance and enforcement of the National Self-Exclusion Register (NSER) for Phase 1 was reliant on findings from the statutory review of the NSER – BetStop.

Structure of this report

The report is structured as follows. Section 2 provides background and section 3 explains the methodology of the NCPF evaluation. The findings and recommendations are discussed in section 4 and section 5 concludes with key implications, the preview of the Phase 2 evaluation and next steps for governments.

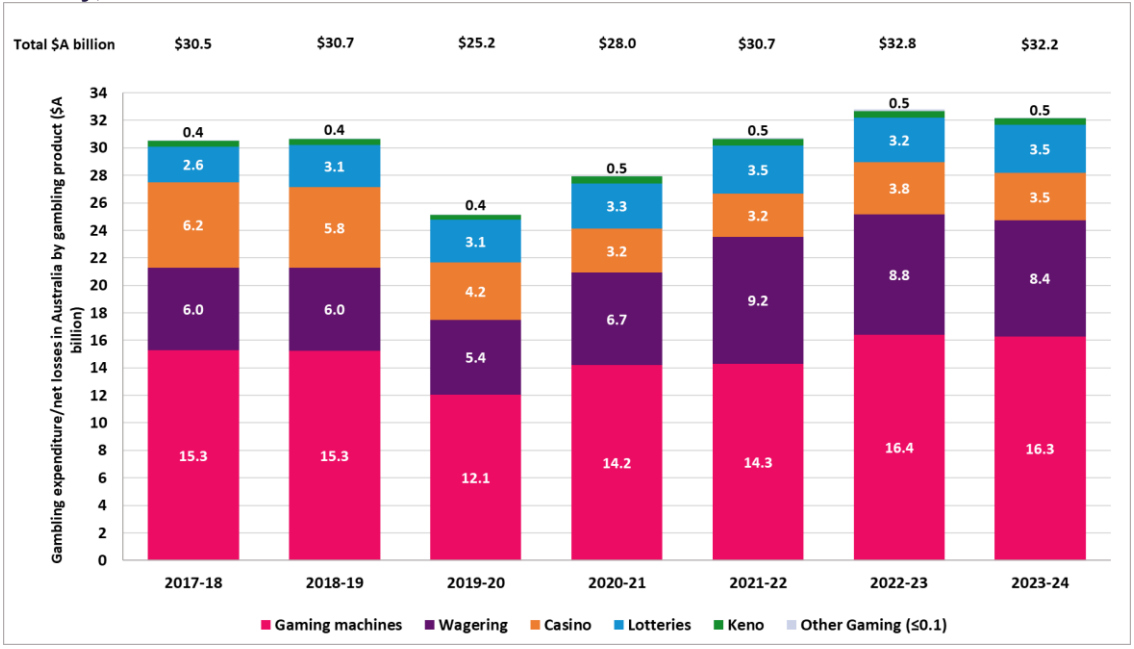
[2] The NPS was slightly updated in May 2022 due to changes to customer verification and activity statements.

2. Background

Online gambling and harm

Australian adults have the highest gambling losses in the world at more than $1,500 per adult in 2023–24 and total losses cumulating to $32.2 billion (H2 Gambling Capital, 2025; Queensland Government's Statistician's Office [QGSO], 2025). The legal forms of gambling driving these losses are land-based gaming machines (pokies) and wagering (sports, races, other events), followed by land-based casinos, lotteries and keno (see **Figure 1**).

Figure 1: Total real gambling expenditure/net loss ($ billion) in Australia, by gambling activity, 2017–18 to 2023–24



Notes: These data should be read in conjunction with the explanatory notes and other expenditure tables in this publication. Gaming machine expenditure is only for those located in pubs, clubs and hotels. Expenditure from gaming machines in casinos is in the 'casino' category.
Source: QGSO, 2025

Total gambling expenditure in Australia has increased steadily over the past decade. However, various recent state and territory-based gambling prevalence studies are finding overall gambling participation is either remaining stable or decreasing. See: the 2024 ACT Gambling Survey (Rockloff et al., 2025), the NSW Gambling Survey 2024 (Browne et al., 2024) and the Victorian Population Gambling and Health Study 2023 (Suomi et al., 2024).

Despite the decrease in overall gambling participation amongst adults in their jurisdictions, these studies report that online gambling as a distinct category of gambling is increasing; and that overall gambling-related harm either remains constant or is increasing.[3]

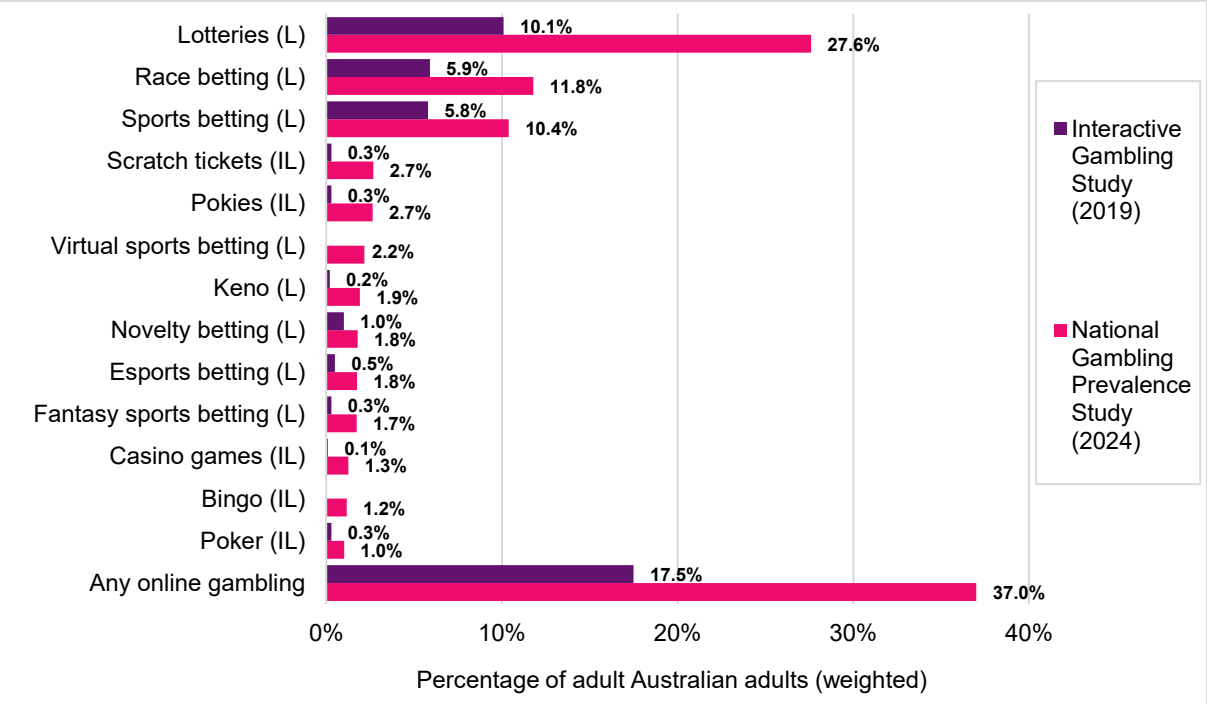
In Australia, online gambling has markedly increased over the past 15 years, with at least yearly participation amongst Australian adults more than doubling from 8.1% in 2010–11 to 17.5% in 2019 (Hing et al., 2014; 2021). The National Gambling Prevalence Study (NGPS) conducted by the Australian Gambling Research Centre (AGRC) in 2024 found that online gambling

[3] The 2023 Northern Territory Gambling Prevalence and Wellbeing Survey Report (Stevens et al., 2024) noted gambling-related harm had increased; however, it also determined that the NT had experienced a slight increase in gambling participation, unlike other jurisdictions.

participation in the last year had doubled since 2019 to 37% in 2024 (AGRC, 2024, unpublished data).

A comparison of the 2019 and 2024 national prevalence studies shows online gambling activities increasing substantially for online lotteries and wagering (race and sports betting) (see **Figure 2**). The proportion of wagerers participating online also increased between 2019 and 2024: from 60.4% to 83% for sports betting and 35.1% to 66.2% for race betting (Hing et al., 2021; AGRC, 2024, unpublished data).

Figure 2: Proportion of Australian adults participating in online gambling activities, 2019 and 2024



Notes: Data sources from the Interactive Gambling Study 2019 (Hing et al., 2021) and the National Gambling Prevalence Study pilot 2024 (AGRC, 2024, unpublished data). L = legal online gambling activities, licensed in Australia; IL = illegal online gambling activities to offer to Australians.

Although participation in online wagering has increased in Australia, its impact on population-level rates of gambling-related harm is difficult to determine. Several recent state and territory-based gambling prevalence studies note that people who gambled online were significantly more likely to experience gambling harm than people who didn't (Browne et al., 2024; Rockloff et al., 2025; Queensland Government, 2024).

It is difficult to assess whether this association is solely due to participation in online wagering itself or due to other coinciding demographic or behavioural factors. Research by the AGRC found that 70% of people who gamble used 2 or more gambling products, highlighting the complexity of isolating harms attributable to any single gambling type (AGRC, 2023).

The National Consumer Protection Framework for Online Wagering

The NPS includes 10 measures as described in **Table 1**. The NPS consists of 71 principles across the 10 measures (see **Appendix A**).

Table 1: Summary of the 10 NCPF measures, implementation dates and regulators

NCPF Measure	Description	Date/s Implemented	Regulatory authority
1. Prohibition of lines of credit	This measure prohibits the offering or provision of credit by interactive WSPs for wagering purposes, with the exception of certain on-course bookmakers.	17/02/18	Commonwealth (ACMA) via the *Interactive Gambling Amendments Act 2017*
2. Payday lenders	This measure discourages the use of small amount credit contracts (payday lending) for online wagering.	17/02/18	Commonwealth (ACMA) via the *Interactive Gambling Amendments Act 2017*
3. Customer Verification	This measure changes the customer verification period to customer pre-verification for online wagering across all jurisdictions (29 September 2023). This replaced the previous iterations of customer verification under the NCPF from 14 days (or less) for customer verification to continue using an online wagering account (26 February 2019) to a 72-hour (or less) verification period (2 May 2022) for customer pre-verification.	26/02/19: 90 days to 14 days 2/05/22:14 days to 72 hours Non-NCPF Refinements: 29/09/23: Pre-verification through an account 29/09/24: Pre-verification prior to having an account	Commonwealth (AUSTRAC) via the *Anti Money Laundering and Counter Terrorism Financing Rules Instrument 2007* (AML/CTF Rules)
4. Restrictions on inducements	This measure prohibits WSPs from offering incentives to open new accounts or refer another person, and restricts inducements or incentives to within loyalty programs where this is required by state or territory law. It requires express consent for any direct marketing and prohibits turnover requirements on bonus bets.	May 2019 (All jurisdictions except NSW) 26/11/19 (NSW)	State/territory governments
5. Account closure	This measure ensures that closing/cancelling an online wagering account is readily available and accessible by all customers, that closures begin immediately and that customers who indicate they wish to close an account cannot be encouraged to change their mind.	May 2019 (All jurisdictions except NSW) 26/11/19 (NSW)	State/territory governments
6. Voluntary opt-out pre-commitment scheme	This measure outlines a requirement that all operators offer an opt-out and binding pre-commitment scheme that allows consumers to set limits on the amount they deposit into an online wagering platform.	May 2019 (All jurisdictions except NSW & Tas) 26/11/19 (NSW) 12/12/19 (Tas)	State/territory governments
7. Activity statements	This measure requires WSPs to provide customers with statements summarising their wagering activity. Statements must be sent monthly, be easily accessible on demand at any time and provide clear summary information that can be easily understood using common terms that customers are familiar with. Activity statement documents are available on the DSS website.	May 2019 (All jurisdictions except NSW & Tas) 26/11/19 (NSW) 12/12/19 (Tas)	State/territory governments
8. Consistent gambling messaging (CGM)	This measure provides for evidence-based, consistent gambling messaging designed in collaboration with experts to be displayed alongside advertising for online wagering and clearly visible on betting websites and accounts. Relevant documentation includes the Consistent gambling messaging implementation plan and Consistent gambling messaging frequently asked questions.	March 2023	State/territory governments
9. Staff training	This measure requires that all staff involved in the provision of wagering services, or with the capacity to influence the wagering service, must undertake	March 2023	State/territory governments

NCPF Measure	Description	Date/s Implemented	Regulatory authority
	Responsible Service of Gambling training. Staff training documents are found on the DSS website.		
10. National self-exclusion register (NSER – BetStop)	This measure provides for a national self-exclusion register for online wagering. This system ensures that those experiencing gambling harm can immediately exclude themselves from the services offered by all interactive wagering service providers. See the NSER webpage for more details.	21/08/23	Commonwealth (ACMA) via the *Interactive Gambling Act 2001*

3. Methodology

NCPF Evaluation Design

Prior evaluation design work, 2018-2023

The NCPF included a provision for a Performance, Review and Evaluation Strategy (PRES) to guide evaluation activities to assess the effectiveness of the measures in achieving outcomes for consumers and to inform ongoing refinements. In April 2018, the DSS commissioned Communio to develop a PRES for the NCPF, which included a program logic, theory of change (ToC) and performance measurement framework (see **Appendix B**).

The baseline study was completed in 2019 by the AGRC (Jenkinson et al., 2019). The DSS then commissioned the AGRC to conduct the post-implementation review, process and impact evaluations of the NCPF over a 3-year period from June 2024 to June 2027, split into Phases 1 and 2.

Phase 1 evaluation

This Phase 1 evaluation has been designed as a post-implementation review and process evaluation. Its primary purpose is to assess how the NCPF and its measures were implemented in practice, the extent to which implementation aligned with the NCPF's principles and the implications of timing, governance and operational settings for future effectiveness.

The report provides recommendations to improve the implementation of the framework. These recommendations focus on promotion, education, communications, awareness, uptake and compliance. Recommendations are also provided for 4 NCPF measures where 6 principles are yet to be completely implemented.

Given the staged and protracted rollout of measures over nearly 6 years, uneven availability of monitoring data and the differing maturity of measures at the time of evaluation, Phase 1 focuses on implementation, consistency, promotion, awareness, uptake, compliance and governance, rather than attributing impacts on wagering behaviour or harm.

All 10 measures are considered at a whole-of-framework level, with more detailed analysis undertaken for a subset of measures where the evidence base was strongest and where operational policies most directly affect consumer experience.

An evaluation of the NSER's promotion, education, awareness, uptake, compliance and enforcement was out of scope, as these areas were addressed in the NSER statutory review (Eccles, 2025).

Phase 2 overview

Phase 2 will build on this foundation by examining impacts and outcomes, drawing on additional data sources and longer time series as measures mature, and will assess the extent to which the National Framework and its measures have contributed to changes in wagering behaviour and gambling-related harm.

It is important to note, however, that the ability to measure change in wagering behaviour and gambling-related harm is constrained by the extended and uneven implementation of NCPF measures and limited baseline and monitoring data. As a result, Phase 2 will adopt a cautious,

contribution-based approach, drawing on multiple data sources and longer time series as measures mature, rather than seeking to attribute impacts to individual measures prematurely.

Together, Phases 1 and 2 are intended to provide a coherent and sequenced evidence base, with Phase 1 identifying what has been implemented and what can reasonably be actioned now and Phase 2 testing effectiveness and informing longer-term refinement.

Phase 1 evaluation methodology

The Phase 1 evaluation uses multiple methodological components to gather information (see **Table 2**). A detailed evaluation matrix outlining the evaluation questions, indicators, metrics and data sources for Phase 1 can be found in **Appendix C**.

Table 2: NCPF Phase 1 Evaluation, summary of data sources

Data source	Description
Rapid literature review	Academic and grey literature associated with the NCPF and its measures
Desk research	Documentation from relevant Australian and state/territory governments responsible for the enactment, implementation and/or regulation of the NCPF measures
Environmental scan	An environmental scan and content analysis of compliance with the requirements of the CGM measure using 20 WSP websites and 20 WSP apps
Stakeholder interviews	Twenty-four semi-structured interviews with officials from 8 Australian, state and territory governmental policy and regulatory bodies, 13 WSPs, one peak body for the wagering industry, one public health academic, one help provider and one gambling harm reduction advocacy organisation
Consumer interviews	Semi-structured interview with 30 individuals aged 18 years or older, living in Australia who had lived experience with online wagering and awareness and/or use of the NCPF measures
Consumer survey	An online survey conducted with 698 Australian adults who wagered online in the past 12 months, recruited through an online probability-based panel. This was weighted to a benchmark estimate of a representative sample of last 12-month online wagerers.
Additional data	National Gambling Prevalence Study Pilot 2024 (AGRC, unpublished data); National Gambling Trends Study 2023 and 2024 data (AGRC, unpublished data); H2 Gambling Capital data (2025); Australian Gambling Statistics data (QGSO, 2025); Interactive Gambling Study 2019 (Hing et al., 2021); template Activity Statements provided for 4 large online wagering operators in Australia

For this evaluation, AIFS conducted a consumer survey to inform many of its findings. Consumer data were collected using both a probability-based online panel and an opt-in online panel. Due to data quality issues with the opt-in panel, the analysis focused on the probability-based panel data. Interpreting the survey data requires a level of caution, as they are self-reported consumer experiences. They depend on recall of past experiences and a clear understanding of the questions.

A low-risk ethics approval was requested and received for the lower-risk research components (Ethics number: NCR-05). A high-risk ethics approval for the consumer interviews and online consumer survey was approved by the AIFS Human Research Ethics Committee (HREC) (Project ID: 2025/05).

This evaluation has some limitations:

- As noted previously, it was envisaged that the measures under the NCPF would be implemented within 18 months from the National Framework's commencement. However, measures were implemented and refined over almost 6 years, and most did not have monitoring data collected. Undertaking an evaluation of multiple measures introduced over a long period with limited data has resulted in evidence gaps. These same gaps will also limit the ability to measure changes in wagering behaviour and gambling-related harm in

the Phase 2 evaluation. While data was sought from government stakeholders and WSPs across jurisdictions, the promotion and compliance information obtained was limited.

- The NPS (DSS, 2018) consists of 71 principles across the 10 measures. The depth of testing for each principle across the research questions varied due to data access and the decision to prioritise more prescriptive principles that were easier to measure.

4. Evaluation findings

Has the National Framework been implemented as intended?

Key findings

- The 10 NCPF measures were all implemented between February 2018 (pre- NPS) and September 2024, a significantly longer period than the expected 18-month implementation stated in the NPS.
- A feasibility study into a centralised pre-commitment scheme (across operators) was supposed to be commissioned by the DSS but remains outstanding.
- Implementation delays across the 10 NCPF measures were due to the complexity in technical design of some measures, COVID-19 disruptions, the need for legislative changes across jurisdictions and the former provider for NSER going into voluntary administration.
- Only the Australian Government measures had formal embedded review mechanisms, outside the NCPF evaluation. Some jurisdictions nevertheless undertook reviews and refinements of specific measures.
- Delays in implementing the full set of NCPF measures led to delays in their evaluation, which, in turn, deferred opportunities to refine them. The NPS lacked a mechanism to adjust the evaluation's timing or scope, reducing flexibility to support decision making.

Full implementation

The NPS (DSS, 2018) stated that 10 consumer protection measures would be implemented. All measures have been implemented. The NCPF contains 71 principles across the 10 measures. Of the 71 principles, 6 principles relating to 4 NCPF measures have not been consistently and/or fully implemented in some jurisdictions. This is more fully explored in the section on whether the measures were implemented consistently.

All principles in **Table 3**, except for Principle 38, were implemented, though implementation varied across jurisdictions due to differing interpretation of these principles. Principle 38 has not been implemented and remains outstanding. See **Appendix A** for more detail on all NPS principles across NCPF measures.

Table 3: NPS principles implementation

NCPF measure	NPS principles
Restrictions on inducements	**15.** All direct marketing to customers may only be sent to customers who provide their express consent to receive this material. **17.** No further direct marketing materials may be sent to a consumer from the time their unsubscribe request is received.
Account closure	**24.** An interactive wagering service provider must not directly promote or market to a customer following the closure of the customer's account.
Voluntary opt-out pre-commitment scheme	**35.** Customers must be able to choose the time period for their deposit limit from a range of periods, including daily, weekly, fortnightly and monthly. **38.** Governments will assess the feasibility and costs of a centralised pre-commitment system, taking into account the costs and benefits for consumers (feasibility study).
Activity statements	**47.** Activity must not include any promotional or direct marketing information. They should use red text to show losses and black to show wins (no use of green text).

Timeliness of implementation

The NPS stated that the measures would be progressively introduced over 18 months from 26 November 2018. The 10 NCPF measures were implemented (and some refined) from February 2018 (pre-NPS) until September 2024. In particular, the first 6 measures were implemented on time. The last 4 measures (activity statements, CGM, staff training and the NSER) were not implemented within the 18-month time period. They were generally delivered 6 months after completion of trialling and testing of the features of the measures.

Some WSPs and state and territory regulators noted it was not realistic for all the measures to be implemented in 18 months. This was due to the complexity of implementation involving different regulatory regimes across the jurisdictions, as well as the technical design features of the reforms (*Interactive Gambling Act 2001 (Cth), Betting and Racing Act 1998 (NSW)*).

> I think there just needs to be a bit more appreciation that to build technical changes into a product, particularly the ones that are consumer facing, it needs to be perfect … before it goes live, so it doesn't cause friction with our consumers. (WSP, large corporate bookmaker, NT licensed)

Unexpected events also delayed the implementation of NCPF measures. These included disruptions caused by COVID-19, procuring appropriate research for CGM and the first NSER developer (Big Village) going into voluntary administration, with the Australian Communications and Media Authority (ACMA) having to source a new provider for this work (Dataworks Group, formerly IXUP Limited) (Eccles, 2025).

Governance mechanisms

The NCPF was implemented with the assistance of an Implementation Governance Committee (IGC). It was established in 2019 with representatives from every jurisdiction and was chaired by the Australian Government.

State and territory gambling regulators and WSPs noted that there were governance issues around the implementation of some measures.

> There was a lack of understanding about how each jurisdiction would need to go about implementing [consistent gambling messaging] and how long that would take. And it seemed like nobody was leading the process, the Commonwealth

> [was] just very hands-off. (Policy & regulation stakeholder, state/territory government)

> I think the way that consistent gambling messaging was done would help. Everyone was on the same page … Had activity statements been done the same as consistent gambling messaging, I think we'd be fine across the board for all the measures. (Policy stakeholder, state/territory government)

These seemingly conflicting statements reflect mixed views by government officials about where responsibility for implementation rested and confusion about leadership and coordination. The IGC Terms of Reference specified that IGC members shared responsibility for overseeing the framework and implementing the measures and the Commonwealth led many of the processes to develop the measures (IGC terms of reference and minutes, DSS 2019–23).

The statements also reflect mixed views on the most available mechanisms to adopt when implementing measures, such as the appropriateness of highly specific guidance compared to allowing more discretion.

There are trade-offs when using each approach. For example, the CGM measure had highly specific guidelines issued to WSPs (DSS, 2022a; 2022b; 2024). However, WSPs reported that they found some aspects impractical to follow despite providing input to the guidelines. By contrast, the guidance for implementing activity statement gave WSPs discretion on how to design the statements. In both cases, this evaluation found a lack of consistency in the operation of the measures.

Implementation guidance for the Australian Government measures (restrictions on credit and payday lenders, customer identity verification and the NSER) was developed and communicated by the Commonwealth. For the first 3 of these measures, this guidance was largely contained in legislation. The NSER has resources available to WSPs through the ACMA website.

For the state and territory measures, stakeholder resources such as plans, definitions, frequently asked questions, prototypes (for activity statements) and training modules (for staff training) were developed by the IGC after receiving input from experts and WSPs. Resources for activity statements, CGM and staff training are hosted on the DSS website. State and territory regulators are able to direct WSPs to these resources.

Consumer interviews revealed that where implementation guidance was open to interpretation, WSPs may not be offering the level of protection expected. An example is where features are intended to be 'accessible' to consumers (e.g. being able to unsubscribe from direct marketing, close an account, set deposit limits, access activity statements).

> I reckon, sometimes ... they have the unsubscribe button right at the bottom [on direct marketing messages], so you actually have to look through it, like look through the whole ad, which can be, like, discouraging … If they have [the unsubscribe button] like, in a really hidden kind of [place], that would be kind of detrimental to anyone who actually was trying to unsubscribe. (P014, moderate-risk gambler, 18–24, female, Vic)

Consideration should be given to the appropriate balance between a prescriptive approach and allowing for discretion when issuing guidance that produces consistent, effective protection tools

and guidance that anticipates technology changes. Some measures lend themselves to a prescriptive approach as they are largely binary; for example, credit is either offered or it is not.[4]

Measures such as activity statements and CGM have several elements where variation can occur such as frequency, design and delivery medium. These measures need guidance that is sufficiently prescriptive so WSPs understand its intent and regulators can take enforcement action where WSPs are not compliant with this intent.

Resourcing for implementation

The implementation of the NCPF and its 10 measures required significant efforts and resourcing by jurisdictions and industry. The IGC held 18 regular meetings, 9 extraordinary meetings, 7 industry briefings and various bilateral meetings until 2023 (DSS internal communications).

An Implementation Working Group (IWG) was also established during the implementation period for the staff training measure. The IWG was comprised of people with lived experience of gambling harm, WSPs and representatives from jurisdictions. It held 11 meetings (DSS internal communications).

Jurisdictions developed legislation, regulations and guidance and then resourced compliance teams. Statutory reviews were undertaken for the 3 Australian Government measures (prohibition of lines of credit, payday lenders and the NSER).

Trialling and testing were required to help develop some measures and third-party service providers were contracted to operate the NSER and provide staff training. People with lived experience and WSPs provided vital input to develop the NCPF measures. Wagering operators contribute to the cost of the NSER by paying a cost-recovery levy (ACMA, 2025).

Review and update of measures

The NPS noted that 'the National Framework would be regularly reviewed, updated and refined as part of its continuous improvement, to keep pace with best-practice and the changing gambling environment' (DSS, 2018, p. 1). The NPS further stated that the IGC will be 'responsible for assessing, monitoring and determining proposed changes to the National Framework, in accordance with the principles for maintaining consistency' (DSS, 2018, p. 20).

Mechanisms for refining 3 Commonwealth measures were built into the NPS: credit betting prohibitions, customer verification and the NSER (DSS, 2018). These mechanisms were statutory reviews, which are reviews mandated in legislation requiring the effectiveness of an Act to be examined after a set time, with the findings usually reported publicly.

The other measures were not subject to cross-jurisdictional review and refinement, although several jurisdictions did refine measures individually. Victoria updated their guidance for operators to impose stricter requirements for the content of activity statements (Victorian Gambling and Casino Control Commission [VGCCC], 2023). It also refined its guidance on direct marketing, moving from an opt-out to opt-in model (Victoria Government Gazette, 2022). South Australia adopted this model of direct marketing in the *Authorised Betting Operations Gambling Code of Practice* on 30 March 2023. Western Australia also adopted this model on

[44] This assumes that credit can be well-defined and this has been attempted in the *Interactive Gambling Amendment (Credit and Other Measures) Act 2023* (Cth). Where definitional issues arise, such as for inducements, the measure's impact will be greater if a common definition can be agreed.
Discretion was provided to WSPs for activity statements, resulting in a lack of consistency. Little discretion was provided to WSPs in CGM. Where guidance wasn't provided for volume and tone, some WSPs used this lack of guidance in a way that was considered not within the spirit of providing clear harm reduction messages. It is easier for regulators to judge compliance where highly specific guidance is provided. However, it also results in many elements that need checking by regulators.

6 February 2025 when they amended the *Betting Control Regulations 1978* to legislate the NCPF. NSW issued guidance on the volume and tone requirements for delivering the CGM taglines (Liquor & Gaming NSW, 2023).

It is reasonable to assert that there was a missed opportunity to review the remaining measures earlier in order to identify and make changes to improve their effectiveness. As outlined later in the report, measures to address deficiencies such as confusion over account closure, account suspension, self-exclusion and taking a break could have been identified and addressed in a more timely manner.

Were the measures promoted consistently and what has been the level of awareness and uptake?

Key findings

- Promotion and education of the NCPF measures by governments and WSPs have been limited. Awareness of the measures is generally low, especially for measures that WSPs are not required to actively promote under the framework.
- There is low uptake of measures that require customer activation (e.g. deposit limits, account closure and NSER registration). Use of activity statements that require customer engagement is also low.
- There is agreement from WSPs, consumers and a key harm advocacy body about the need for more promotion and education of the measures.

Recommendations

- **Recommendation 1a:** (**R**) Regular whole-of-community awareness campaigns should be conducted to promote the NCPF, with supplementary campaigns targeted towards high-risk consumers explaining how consumers can activate and engage with measures.
- **Recommendation 1b:** (**R**) Regular education campaigns should be conducted to promote the NCPF and how consumers can activate and engage with the NCPF measures. These campaigns should focus on health professionals, financial counsellors, bank employees and frontline assistance workers so they can direct clients to the NCPF measures.
- **Recommendation 1c:** (**R**) Promotion and education campaigns should be evaluated to measure their effectiveness at increasing consumer awareness and engagement with the NCPF.
- **Recommendation 1d:** (**R**) Australian governments should ensure fact sheets and guides for consumers explaining how the NCPF tools work and the protection they offer are available online on help-providing sites and other channels. These fact sheets should include advice on how consumers can make complaints if they are concerned that WSPs are not compliant with the NCPF measures.

The theory of change for the NCPF assumes that promotion and communication of the NCPF to the community will increase public awareness of the measures. Awareness of the measures is then assumed to lead to an increase in public confidence of the consumer protection measures

for online wagering. This, in turn, should result in uptake of the measures increasing (see **Appendix B**).

The current evaluation does not have evidence of causality between the measures of promotion and awareness, and confidence and uptake. The evidence presented here only answers whether the NCPF has been promoted as required by the NPS and the current levels of awareness and uptake among consumers.

Has there been consistent promotion, education and communication of the National Framework across jurisdictions?

The NPS states that the Australian, state and territory governments are committed to 'actively promoting an awareness and understanding of the National Framework by providing information to consumers, the community, industry, and other stakeholders' (DSS, 2018, p. 5). Some measures have principles regarding their promotion to consumers:

- **Deposit limits**:
  - A voluntary pre-commitment scheme must be easily accessible and effectively promoted to consumers.
  - A customer must be prompted to set a deposit limit during the account sign-up process.
  - All customers must be prompted to set and review their deposit limit yearly, at a minimum, including customers who have chosen not to set a limit (with further enhancement considered after trialling and testing).
  - The availability of the pre-commitment scheme should be promoted beyond initial account sign-up, with education and awareness of the scheme shown on a WSP's website and their promotional material.
- **Activity statements**: must include links and information on support services and safe gambling messaging that promotes available consumer protection tools.
- **CGM**: gambling message(s) must be used in connection with any interactive wagering service, including as it relates to the following: within their customers' 'My Account' window; on their websites and internet applications; on direct marketing materials; on print and broadcast advertising; on any sponsorships and promotional activities.
- **NSER**: The NSER is to be effectively promoted so consumers are educated about self-exclusion and aware of the scheme (DSS, 2018).

Promotion and education of the NCPF measures occurred through:

- government to WSPs (through industry briefings and engagement between regulators and WSPs)
- government to consumers (through social media and website)
- WSPs to their own staff (through training)
- WSPs to consumers (through their platforms)
- help providers to consumers (through websites and in-person counselling sessions).

The evaluation investigated the level and effectiveness of the education, communications and promotion activities.

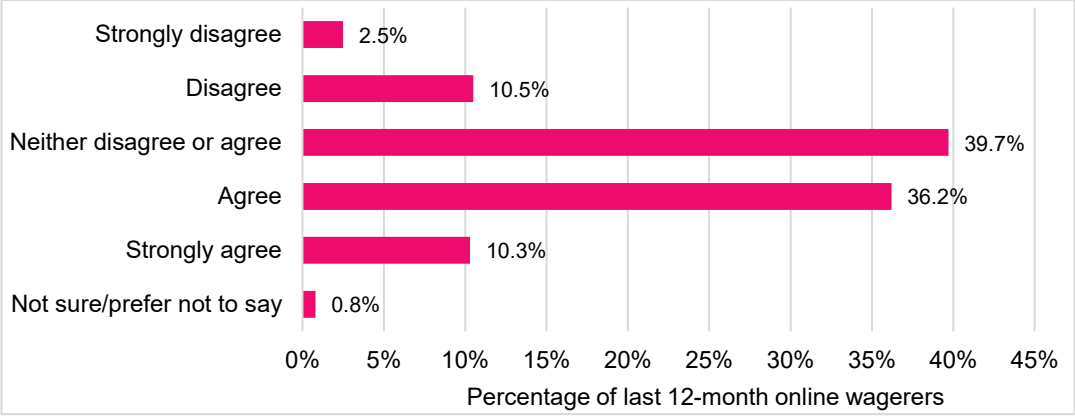
Interviewed consumers expressed concern that some measures, such as restrictions on inducements, were under-promoted, whereas other measures, such as deposit limits, were more effectively promoted.

> Wouldn't you think if I went searching on an account to say, referrals [or] that sort of stuff, it should link you to either the [government entity website] to say, this is what we've stopped now, you can't do it and it should be like on the account to say – even if you search for it under frequent questions and bonus bets or whatever, it should come up and link you to what's allowed and what's not allowed, but there is nothing that shows you that. (P003, low-risk gambler, 55–64, female, Vic)

> Every time I opened up one of these new accounts over the last few years, [the prompt to set a deposit limit] was always the first thing that sort of popped up at the registration process. […] Even the [operators] that I'm already signed up to, they still do regular sort of messaging around that [deposit limit setting], […] so it's like [I'm] definitely aware of it. (P025, high-risk gambler, 35–44, male, WA)

A consumer survey conducted for this evaluation showed that a significant minority (46.5%) of wagerers who wagered in the last 12 months reported that they 'agree' or 'strongly agree' that WSPs effectively promoted deposit limit setting. However, a majority of respondents neither agreed nor disagreed (39.7%) or reported some level of disagreement (13%) with this view, indicating there may be room for improvement in promoting deposit limit setting (see **Figure 3**).

Figure 3: Agreement on whether online betting operators effectively promote setting deposit limits



Notes: Online wagerers last 12 months (weighted data: *N* = 641). Excludes sample who did not have their own betting account (*n* = 20) or did not use a legal online WSP (*n* = 27).
Source: NCPF Online Consumer Survey

The evaluation also investigated how education, communications and promotion activities could be enhanced, finding that government-provided information was helpful along with WSPs continuing to promote measures, even if those measures had been in place for some time. It found little evidence from other evaluations of the effectiveness of education, communications and promotion activities. More detail is provided below.

One WSP noted that official government information on the NSER website helped consumers understand why there were changes. They suggested that a similar initiative on government websites for the other measures would be useful.

> I think one thing that might be useful is actually having a government website directed at consumers, similar to what happened with Betstop. So, Betstop actually had resources we can point them to if they wanted to kind of understand a bit more about it, about the changes, about what's available. That would be quite useful because sending customers to an official government information source is always going to be helpful in explaining why these changes are happening. (WSP, large corporate bookmaker, NT licensed)

After implementation, promotion of measures that consumers did not need to initiate or engage with appeared to decline (e.g. restrictions on credit and payday lending). One WSP commented that because these measures were mandatory and longstanding, they were rarely discussed with consumers. Lack of consumer awareness about measures can result in consumers not realising when WSPs are breaching their NCPF obligations. Thus, consumers are an important part of the compliance monitoring process.

This evaluation only found 2 promotion efforts that had been evaluated. A NSER initial promotion campaign was evaluated and found to be effective but was limited in scope and duration (Eccles, 2025). The DSS coordinated promotion of the National Framework from January to March 2024 using social media and government websites (DSS internal communication). All posts were linked to the Gamblers Help Online (GHO) page. Visits to the GHO website page titled '*managing your relationship with online gambling'* increased by 986% in January 2024 compared to December 2023 (DSS internal communication, 2024).

While general education, communications and promotion campaigns can help to raise consumer awareness, targeting campaigns has the potential to be effective for particular groups. An AGRC study (Tillman et al., 2025) found the main types of help sought by at-risk regular online bettors were:

- calling a helpline (e.g. Gambler's Help, Lifeline; 37.9%)
- browsing a gambling help related website or forum (35.8%)
- seeking help from family, friends or work colleagues (30.5%)
- seeking help from a doctor, psychologist or counsellor (27.4%)
- enrolling in a self-exclusion program (26.3%).

Harm from gambling has been shown to occur across 7 dimensions, including financial, relationships, psychological, health, cultural, work/study performance and criminal activity (Browne et al., 2016). Thus, targeting education campaigns at help providers in these sectors is likely to be helpful, given they support those at risk of harm.

What is the level of awareness of the NCPF measures by consumers?

The findings for consumer awareness of the NCPF measures are limited due to a lack of available data sources. Findings are mainly drawn from:

- Awareness amongst 30 interviewed regular online wagerers (consumers), who were purposefully sampled to cover a range of lived experience of whether they were aware/not aware or had used/not used discretionary NCPF measures (excluding the NSER). Therefore, this sample is **not representative** of the wider population of online wagerers in Australia.
- Self-reported awareness of the CGM taglines by a representative sample of online wagerers who had wagered in the last 12 months from the NCPF online consumer survey.

The National Framework was designed to operate as a suite of 10 consumer protection measures for online wagering. However, general awareness of the framework and its measures may not be widespread, based on the consumer interviews.

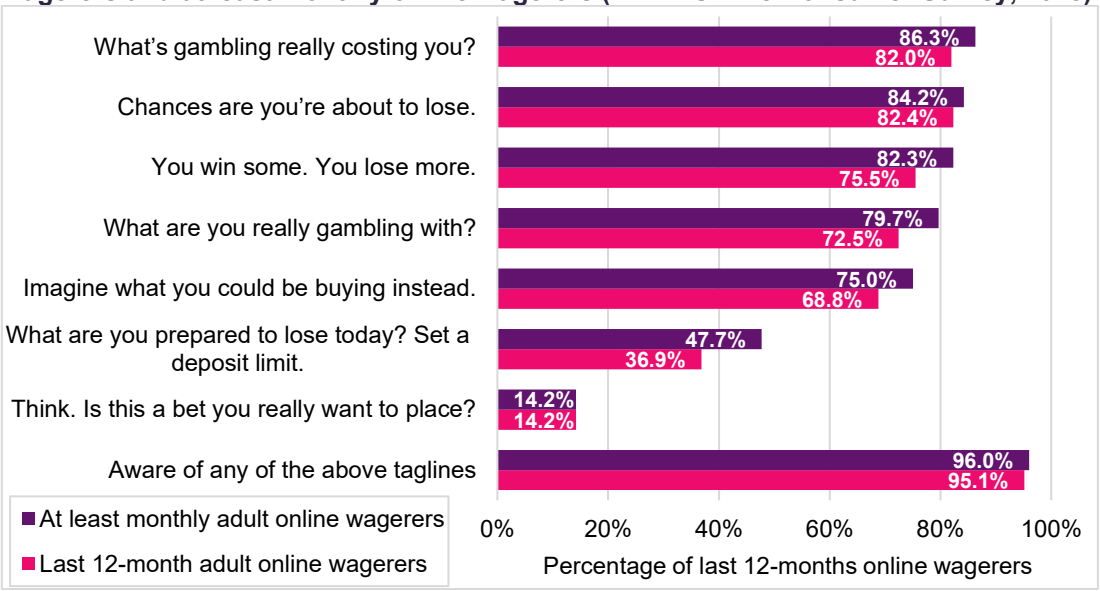
> I know the government has implemented something, but I'm not too sure what it actually is, because the thing is with the government, they seem to have a lot of information that they don't release to the public until you've actually been in that situation. I know they've got some policy in place but I'm not sure, it's not literally public knowledge yet ... They're being sort of secretive about it. (P008, moderate-risk gambler, 55–64, female, NSW)

Among interviewed consumers, awareness was higher for measures which required promotion or visibility under the NPS: prompts to set/review deposit limits, receiving activity statements and seeing/hearing CGMs. Interviewed consumers were familiar with features such as customer verification, account closure and opting out of direct marketing.

Few consumers appeared to be aware of the detailed requirements of measures such as annual deposit limit prompts, time frames around increasing or decreasing deposit limits, simplified account closure, the prohibition of being encouraged to keep their account open or receiving direct marketing after closing their account.

Figure 4 shows that most Australians who had wagered in the last 12 months were aware of at least one NCPF tagline, with awareness generally slightly higher among more frequent wagerers. Taglines not used on TV/video or radio ('What are you prepared to lose today? Set a deposit limit' and 'Think. Is this a bet you really want to place?') had much lower awareness compared to those shown on TV/video or heard on radio after wagering advertising. This reinforces the earlier evidence that visibility drives awareness.

Figure 4: Awareness of CGM taglines among Australian adults last 12-months online wagerers and at least monthly online wagerers (NCPF Online Consumer Survey, 2025)



Notes: Excludes sample who did not have their own betting account (*n* = 20) or did not use a legal online WSP (*n* = 27). At least monthly adult online wagerers (*n* = 328); Last 12-months adult online wagerers (*n* = 641).
Source: 2025 NCPF Online Consumer Survey

Table 5 shows that awareness of the taglines was higher among low- and non-risk wagerers than among higher-risk groups, suggesting a need for more targeted messaging. Interestingly, the awareness of the tagline with 'set a deposit limit' was higher among high-risk gamblers than other groups.

Table 5: Australian adults last 12-months online wagerers awareness of CGM taglines by PGSI at-risk gambling category (NCPF Online Consumer Survey, 2025)

CGM tagline	Non-risk	Low-risk	Moderate-risk	High-risk	Any at-risk
What's gambling really costing you?	83.0%	89.4%	73.0%	71.9%	80.3%
Chances are you're about to lose.	82.8%	86.0%	78.5%	76.4%	81.6%
You win some. You lose more.	75.7%	80.6%	71.2%	69.0%	75.1%
What are you really gambling with?	71.2%	84.8%	63.4%	70.9%	74.6%
Imagine what you could be buying instead.	68.5%	71.4%	67.0%	68.3%	69.3%
What are you prepared to lose today? Set a deposit limit.	34.1%	42.5%	35.1%	51.9%	41.5%
Think. Is this a bet you really want to place?	12.3%	23.3%	10.4%	17.2%	17.6%
Aware of any of the above taglines	**94.7%**	**98.3%**	**92.8%**	**96.1%**	**95.9%**

Notes: Online wagerers last 12 months (weighted data: *N* = 641). Excludes sample who did not have their own betting account (*n* = 20) or using an illegal online WSP (*n* = 27). Non-risk gambling *n* = 419; low-risk gambling *n* = 102; moderate-risk gambling *n* = 84; high-risk gambling n = 36).
Source: NCPF Online Consumer Survey 2025

Most interviewed consumers recalled CGMs from TV ads featuring both text and spoken taglines. While some noticed taglines in wagering apps, many said the text was easy to miss, lacked prominence and did not influence their wagering behaviour.

Awareness of the NSER was not widespread. About 1 in 4 Australian adults (26.5%) were aware of the NSER. Younger adults (aged 18–25) were less likely to be aware of the NSER than those aged 55 and older (Sakata et al., 2025).

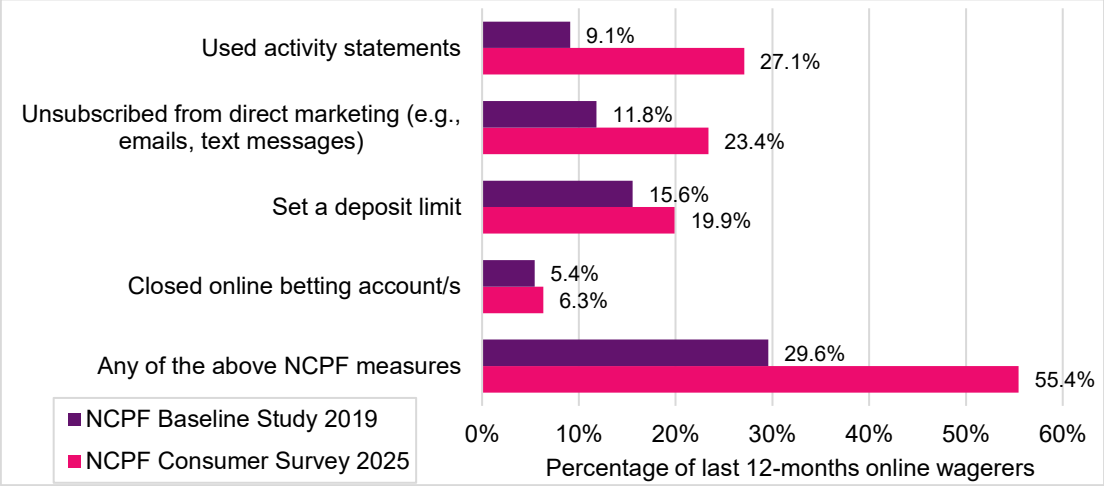
Awareness of measures under the National Framework is important so customers understand how to use the features that offer the best protections to meet their individual circumstances. It is also important that consumers understand the operators' obligations so they can complain if WSPs are not meeting them, especially given the reliance that compliance activities have on consumer complaints.

What is the level of consumer uptake of the NCPF measures?

Some measures need to be activated or engaged with by customers to provide protection. These discretionary measures include setting a deposit limit, closing an account, opting out of being sent marketing materials, using activity statements and registering with the NSER.

Figure 5 shows that the use of 4 of these discretionary measures (excluding the NSER) almost doubled from 27.8% in 2019 to 55.4% in 2025. Survey data is used to judge the uptake of these 4 measures. The NSER relies on registrant data to ascertain its use.

Figure 5: Uptake of NCPF discretionary measures by last 12-months online wagerers pre-implementation (2019) and post-implementation (2025)



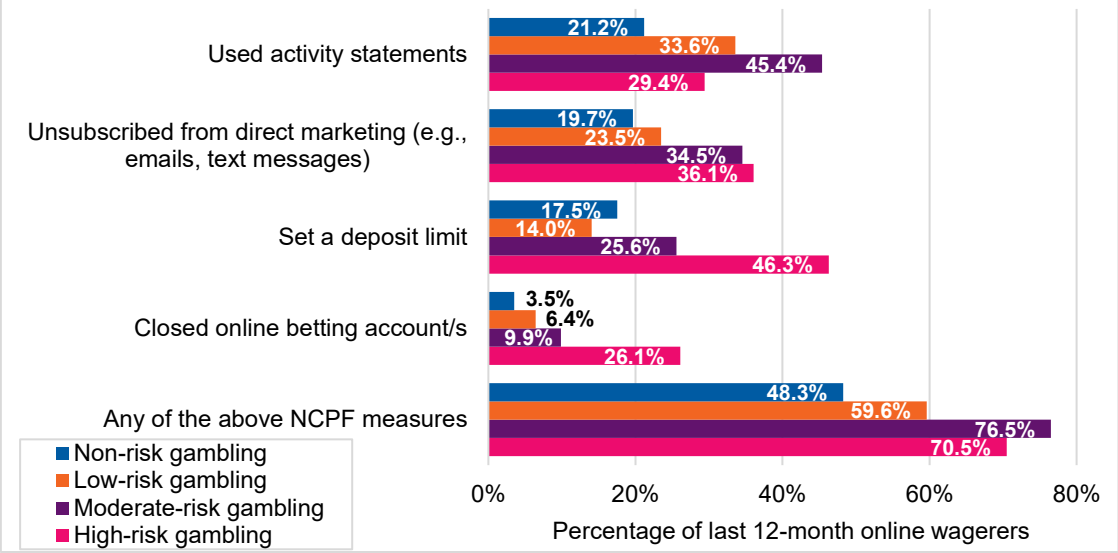
Notes: Weighted figures reported for both the NCPF 2019 (*N* = 5,076) and NCPF 2025 (*N* = 641) data. NCPF 2019 survey asked participants about 'accessing' activity statements, whereas NCPF 2025 asked participants about 'using' activity statements.

The NSER was launched in August 2023. Until the end of June 2024, 25,972 people had registered to self-exclude from online wagering. As of 1 December 2025, there were 34,266 active registrations and 53,308 Australians had used it since its launched.

Figure 6 shows that moderate- and high-risk gamblers were more likely to have used at least 1 of the 4 non-NSER discretionary measures than low-risk or non-risk wagerers. These findings align with the 2019 Baseline Study (Jenkinson et al., 2019) and the 2025 Consumer Survey where uptake was higher among at-risk gamblers than those not at-risk.

These findings reflect the policy design of the NCPF, which is to offer a range of protective tools that can work together to meet the needs of consumers to try to prevent and protect them from harm (DSS, 2018).

Figure 6: Uptake of NCPF discretionary measures by last 12-month online wagerers in 2025 by PGSI category



Notes:– Online wagerers last 12 months (weighted data: *N* = 641). Excludes sample who did not have their own betting account (*n* = 20) or did not use a legal online WSP (*n* = 27). Non-risk gambling *n* = 419; low-risk gambling *n* = 102; moderate-risk gambling *n* = 84; high-risk gambling *n* = 36).
Source: NCPF Online Consumer Survey 2025

Importantly, uptake of a measure does not guarantee it will influence wagering behaviour. For example, customers may reopen accounts or open accounts with other wagering operators after having closed one. The design of protection measures will be further explored in the Phase 2 report.

Barriers to uptake

A key barrier to using consumer protection tools is the perception that they are only for people with 'gambling problems', rather than safeguards for all. Interviews and previous studies confirm this misperception, which may be caused by stigma around gambling harm (Gainsbury et al., 2019; Riley et al., 2024).

Many interviewed consumers acknowledged the value of protection tools such as deposit limits and activity statements for others but did not see them as relevant to themselves, even among those experiencing gambling-related harm. For discretionary measures, the combination of the stigma associated with gambling harm and the need to take responsibility to self-regulate likely contributes to lower uptake among those who need protection the most.

> Because I don't really need one, in my opinion. I'm not really [betting] that much and I think maybe if I started to get more out of control, I probably would set [a deposit limit]. But like I said, I've got pretty good self-control so I know when to stop anyway. (P023, moderate-risk gambler, 18–24, male, Vic)

> When I first got them, I was like, 'oh, what's this?'… then I clicked on it and then I just saw it was like a transaction history of your betting ... or like a summary or whatever … like a bank statement … [but] I don't regularly check them [because] I sort of know what I've bet in the month that's not really like it's a problem for me. If I felt like it's a problem [if bet more than expected], then I probably would check ... then I'll look at those statements with more detail.– (P025, high-risk gambler, 35–44, male, WA)

Several interviewed stakeholders have noted that education campaigns could help normalise protection tools and frame them as universal protections. One WSP suggested high-level campaigns with simple messaging to make tools more accessible and appealing.

How effectively have regulators been monitoring and enforcing operator compliance with the National Framework?

Key findings

- There has been limited regulatory compliance monitoring for the NCPF measures. Responding to customer complaints is the main form of compliance activity.
- Proactive compliance activity by regulators specifically targeting the NCPF measures may be limited by insufficient resourcing and/or prioritisation of compliance activities in the liquor, tobacco or land-based gambling sectors.
- Investigated complaints mainly involved direct marketing to opted-out customers, inducements for opening an online wagering account, inadequate account closure processes and failures by WSP staff to respond to red flag gambling behaviours.
- Regulators reported facing challenges gathering information from WSPs to ensure they were complying with the legislative framework requirements. The time taken by regulators to resolve customer complaint investigations was often significant.
- WSPs noted that jurisdictional legislative inconsistencies place a compliance burden on them, with this burden potentially falling more heavily on smaller WSPs.
- Enforcement penalties for breaches of the NCPF measures vary significantly between jurisdictions. Both Point of Consumption and Point of Supply regulation for the NCPF measures do not exist in every jurisdiction, creating a barrier to compliance actions being undertaken in some jurisdictions.

Recommendations

- **Recommendation 2a:** (R) Regulators should undertake regular, coordinated and proactive compliance activities to ensure systemic non-compliance does not occur.
- **Recommendation 2b:** (R) Regulators should provide timely and public reporting on their activities, including any penalties issued.
- **Recommendation 2c:** (R) The Australian, state and territory governments should mandate that WSPs provide timely, reliable and detailed information that supports compliance, evaluation and policy development activities.
- **Recommendation 2d:** (N) State and territory governments should harmonise their penalty regimes, including setting penalty levels to act as a deterrent for non-compliance with legislation. All jurisdictions should review the length of time available to undertake investigations and prosecutions. This would require legislative change.
- **Recommendation 2e:** (N) State and territory governments should adopt a Point of Consumption regulatory approach to enhance the consumer protections offered by the

NCPF measures and the framework, so all Australian consumers have a consistent minimum level of protection. This would require legislative change.

- **Recommendation 2f:** (Ω) The Australian, state and territory governments should review funding to regulators to ensure compliance activities are sufficient to protect consumers from gambling risk and harm.

Under the NPS, the Australian Government is responsible for monitoring and enforcing compliance for 4 measures: prohibition of lines of credit, payday lenders, customer verification and the NSER (DSS, 2018).

State and territory governments are responsible for monitoring and enforcing compliance for 6 measures: the restrictions on inducements, account closure, the voluntary opt-out pre-commitment scheme, activity statements, CGM and staff training measures (see **Table 1** for more detail).

Compliance activities affect WSPs, regulators and consumers. WSPs must ensure that they are complying with gambling legislation, regulations and guidelines. The role of regulators is to check that WSPs are acting within the legislative framework. The framework is designed to protect consumers, so they can make complaints if WSPs are not complying with the legislation.

Regulators' compliance approaches

Compliance activities

There is a range of compliance activities that can be undertaken by jurisdictions. One of the interviewed regulators stated:

> We've utilised a range of measures, so there's proactive audits, receiving and responding to consumer complaints and other intelligence sources to investigate potential breaches, gathering information and sharing that information too between regulators and or other jurisdictions. So, this assists with that or integrated and consistent approach. (Policy stakeholder, state/territory government)

This evaluation found that limited compliance activities were conducted for the NCPF measures in most jurisdictions, with regular audits only undertaken by a minority. Regulators noted that they had finite resources available and used risk-based compliance methodologies to target their activities. In particular, they noted that more resourcing for intensive enforcement activities was directed towards where the risk of compliance failures and associated harm was highest.

Complaints from customers appeared to be the main trigger for regulators assessing WSP compliance with the NCPF – a reactive form of compliance action. The main types of complaints were:

- Customers still receiving direct marketing despite opting out of it or closing their account.
- Customers being offered inducements to sign up to online wagering accounts.
- Account closures not being undertaken to the satisfaction of the customer.

Some regulators reported challenges with gathering information from WSPs to ensure they were complying with the legislative regime with respect to staff training. This was even more problematic for the staff of operators not licensed in the regulator's jurisdiction.

> Basically, when they're [WSPs are] working from other jurisdictions ... we can get the records from the wagering provider as they should have it, but what we're

> finding is how do we confirm … that they've actually completed the training? (Policy & regulation stakeholders, state/territory government)

The burden of seeking information for assessing WSPs' compliance with the NCPF measures currently sits with state and territory gambling regulators. This issue could be addressed by requiring WSPs to regularly report to regulators on how they are complying with the NCPF measures.

Australian WSPs are already undertaking some external compliance reporting, as seen by the legislated requirement that they report unusual transactions that appear suspicious as well as various types of funds transfers to the Australian Transaction Reports and Analysis Centre (AUSTRAC, 2025). This reporting is used to assist with compliance activities around money laundering, terrorism financing and tax evasion.

Several international jurisdictions, such as the UK and Sweden, mandate that WSPs provide regular reporting to their regulators (United Kingdom Gambling Commission [UKGC], 2025b; Swedish Gambling Authority, 2018).

Consideration should be given to the burden associated with collecting, reporting and analysing these data to ensure that these costs do not outweigh the benefits of using the data to assist with compliance activities.

There are opportunities for regulators to better coordinate and share compliance information; for example, through formal meetings such as the Australasian Casino and Gaming Regulators Forum (NSW Independent Casino Commission, 2023). One stakeholder stated that establishing an NCPF compliance working group within this forum could facilitate this coordination.

There are also inconsistencies in the public reporting by regulators of their compliance activities, such as decisions on consumer complaints. The ACMA, the Northern Territory Racing and Wagering Commission (NTRWC) and the VGCCC post many of their decisions on their websites (NT Department of Tourism and Hospitality, n.d.; VGCCC, 2026), while others such as the Tasmanian Liquor and Gaming Commission publish in their annual reports (Tasmanian Liquor and Gaming Commission, 2025). Some regulators such as Queensland's Office of Liquor and Gaming Regulation, however, do not appear to report their decisions publicly.

Public reporting of decisions assists WSPs to understand how regulators are interpreting legislation, which may assist with compliance. Public reporting also enhances transparency and accountability of both regulatory actions and those of WSPs.

Penalties

Various mechanisms can be used to deter non-compliance by WSPs such as the frequency of education, audits and other activities by regulators. The level of penalties and how frequently they are applied can also deter WSPs from not complying with legislation.

Enforcement penalties for breaches of the NCPF measures vary significantly between jurisdictions. For example, a failure to provide consumers with monthly activity statements is a breach in NSW under the *Betting and Racing Act 1998,* carrying a penalty of up to $110,000 for corporations for each individual offence. By contrast, under WA's *Gambling Regulations Amendment Regulations (No 2) 2025*, a fine of up to $1 million can be applied. Significant differences in penalties across jurisdictions may lead to non-compliant actions in more 'lenient' jurisdictions where compliance is seen as less disincentivised.

Penalties for non-compliant behaviour should be at a sufficient level to deter breaches of NCPF legislation. However, the penalties for breaches of NT's 2019 Responsible Gambling Code of

Practice were small compared to the amounts bet or deposited by the customer. Penalties for 2 analysed decisions were $17,952 and $53,380 for total losses or deposits of $40,769 and around $700,000 respectively. The return of funds to customers is also rare in decisions issued by regulators. Thus, consumers are usually not compensated when WSPs breach legislation.

An analysis of the NTRWC decisions between 2018 and August 2025 found 11 penalties issued for breaches of the NCPF, ranging from $5,338 to $92,500. Most penalties were around breaches to the restrictions on inducements measure, while other notable cases centred on failures by WSP staff to respond to red flag behaviours displayed by customers. Although the latter does not represent non-compliance with the NCPF, it suggests a possible shortcoming of the staff training measure – which aims to improve the ability of staff to detect and address risky gambling behaviours. WSPs systems and processes may also contribute to WSPs not identifying red flags.

Thirteen breaches found between 2017 and August 2025 by the NTRWC and its predecessor (the NTRC) related to gambling while self-excluded, although most did not directly relate to the NSER. These decisions resulted in 11 fines between $6,751 and $27,540 as well as a return of funds to consumers up to $93,082.04. Directing WSPs to return funds to customers **and** issuing fines is a strong incentive for WSPs to comply with legislation and regulation. A return of funds also directly assists complainants.

Some regulators reported that their legislation contained time constraints, resulting in them not being able to pursue investigations and prosecutions, as these activities took longer than the time available. For example, the ACMA noted that it had raised with the NSER statutory review that the 12-month statutory time limit for issuing infringement notices is a challenge, particularly with complex investigations (Australian Parliament, 2026, p. 71).

An opportunity exists for jurisdictions to harmonise their penalty regimes to ensure that penalties act as a deterrent mechanism for non-compliance with legislation and to apply penalties when non-compliant behaviour occurs. The statutory time frames available for regulators to undertake investigations and prosecutions should also be reviewed to ensure it is sufficient.

Point of Supply and Point of Consumption regulation

Jurisdictions apply regulations to WSPs using a Point of Supply (PoS) and/or a Point of Consumption (PoC) approach.

- PoS – the jurisdiction applies their regulations to wagering providers licensed by that jurisdiction.
- PoC – the jurisdiction applies their regulations to operators offering services to residents of their jurisdiction.

All jurisdictions operate PoS regulations for the WSPs they licence. Most jurisdictions also apply PoC regulations for taxation and some states apply a PoC regime for advertising regulations. Victoria and SA apply a PoC regime for the NCPF measures to any operator providing services within the state.

Pursuing complaints against WSPs operating across jurisdictions can be complicated because of the operation of PoC/PoS regimes. The desktop review and the interviews found several instances where interactions between PoC and PoS regimes delayed or prevented adequate compliance activity. These complexities can also result in regulators being unwilling to take responsibility for investigating complaints.

> A client … who is located in Victoria … and the online gambling provider is licensed with NSW for instance, right? And we have this particular dispute with this online gambling provider and the financial counsellor tried to lodge a complaint with VGCCC [Victorian regulator] … And the New South Wales regulator … they try to handball the responsibility to each other. No, you go to NSW, the NSW one goes, no, you go to Victoria. (Gambling help provider)

These challenges occur when a WSP licensed in one jurisdiction provides services to clients located elsewhere.

If an online wagerer lodges a complaint with their local regulator and that regulator lacks relevant rules or sufficient evidentiary basis to address the issue, the complaint is often referred to the regulator in the jurisdiction where the WSP is licensed. Some regulators noted that they provide the contact details of the relevant regulator to assist the complainant pursue their concern. However, a gambling harm body noted that consumers were not always actively supported to connect with the right services.

> So many consumers will go to their state or territory regulator for [a complaint] that actually needs to go to the … Northern Territory Racing and Wagering Commission or to ACMA … but I have seen letters from other regulators where it simply [says] 'This is not us, end of story.' without even saying, 'This is where you should go.' ... I think [with] a No Wrong Door policy … wherever [the complaint comes to it would be] shepherded to the right place … I think [that policy] would really assist in making sure that consumers feel empowered to make a complaint if they see something that doesn't seem right. (Gambling harm advocacy body)

Because many large WSPs are licensed in the NT, the NTRWC investigates complaints from wagerers outside its jurisdiction. This places a large regulatory burden on the NT.

If jurisdictions agreed to adopt PoC regimes for the 6 NCPF measures regulated at state/territory level, these NCPF measures could be enforced more consistently across Australia, thereby enhancing consumer protections.

Some regulators noted that compliance activities for online wagering were not always actively pursued. Reasons noted in the interviews with regulators included:

- jurisdictions having few resources to undertake compliance work, especially proactive work
- jurisdictions with a single licensed WSP only assessing that WSP's compliance under a PoS model rather than the compliance of all WSPs operating within its jurisdiction
- difficulties obtaining information on the activities of WSPs
- some regulators being unable to check compliance for certain measures themselves as regulator staff or agencies not permitted to have online wagering accounts
- consumers not being aware of some measures meaning they don't lodge complaints.

Compliance funding

Most regulators operate under legislation that seeks to achieve multiple objectives. These may include maintaining the integrity of the wagering industry, protecting a source of public revenue derived from gambling and minimising gambling harm (*Betting and Racing Act 1998* (NSW)).

The Australian Government regulators (ACMA, the Australian Securities and Investment Commission and AUSTRAC) are responsible for compliance across a range of activities in addition to gambling.

Likewise, many state and territory regulators are responsible for compliance of the gambling industry as well as liquor, such as in NSW, Qld, SA and Tas.

This breadth of coverage can limit the ability of regulators to sufficiently resource online gambling compliance activities.

Table 6 shows the significant revenue raised by states and territories from gambling taxes and levies across all forms of gambling (QGSO, 2025).

Table 6: Government revenue from gambling (in $millions) by state

Financial year	NSW	Vic	Qld	WA	SA	Tas	ACT	NT	Aus
2017–18	2,330.3	1,704.2[I]	1,188.1[I]	359.0	393.3	77.0[I]	48.9[I]	94.3[E]	6,195.3[EI]
2018–19	2,480.5	1,820.3[I]	1,268.6[I]	383.7	409.7	83.5[I]	51.7[I]	96.3	6,594.3[I]
2019–20	2,225.4[R]	1,475.8[I]	1,181.6	412.7	338.7	83.6[I]	55.7	75.1	5,848.5[IR]
2020–21	2,590.6[R]	1,277.3[I]	1,659.9	482.2	455.9	107.6	68.0	98.9	6,740.3[IR]
2021–22	2,659.5[R]	1,847.0[I]	1,668.8	493.1	530.4	110.2	72.0[R]	98.1	7,479.0[IR]
2022–23	3,362.0[R]	2,279.4[I]	1,932.6	535.9	619.5	113.7	86.1[R]	108.9	9,038.1[IR]
2023–24	3,487.9	2,357.8[I]	2,097.8	559.1	631.7	122.4	86.3	109.3[I]	9,452.3[I]

Notes: E = Estimated Data, I = Incomplete Data, R = Revised Data. Government revenue is defined as 'The revenue received by state governments from gambling activities that are subject to state taxes and levies' (QGSO, 2025, p. 2). For racing and sports betting, 'government revenue is primarily derived from a Point of Consumption tax (POC tax)' (QGSO, 2025, p. 17). These figures do not include gaming machine licensee levies. UBET TAS also pays an annual wagering levy, which has not been included in these figures.
Source: QGSO (2025)

The Australian Government also receives revenue from gambling companies through company tax receipts. The desktop review found that jurisdictions do not generally earmark gambling revenue to fund gambling protection measures. Apart from general funding for gambling regulators, most do not have dedicated budget funding set aside for regulators to specifically undertake gambling compliance activities.

Regulators in jurisdictions such as NSW and Qld that share a regulatory role for alcohol also do not have separate compliance funding for each regulated industry and instead address areas of concern across these industries as regulatory priorities (NSW Department of Creative Industries, Tourism, Hospitality and Sport, 2025; Office of Liquor and Gaming Regulation [OLGR], 2025). This means the amount spent on gambling compliance from appropriation funding in these jurisdictions, especially specific activities involving the online gambling sector, may depend on these priorities or assessments of licensee risk (OLGR, 2025).

The NT uses a Racing and Wagering Fund Levy to raise funds for the compliance activities of the NTRWC. This funding is small compared to the revenue raised from gambling taxes (NTRWC, 2025).

Ensuring compliance is well-funded helps to protect the community from harm. Consideration should be given to reviewing the funding available to support gambling compliance and enforcement activities for regulators from all Australian governments.

WSP compliance

The interviews with WSPs provided an understanding of how WSPs navigated the regulation of the NCPF. Several WSPs stated they had engaged with regulators to seek clarification about the NCPF measures and to ensure they were compliant with the requirements.

> We have tried to maintain open dialogue with regulators where we think we might have identified an issue in our compliance framework or some broader aspect of the measure. (WSP, medium corporate bookmaker, NT licensed)

In line with the evaluation findings of jurisdictional differences in legislation for some measures, several WSPs noted that different jurisdictions had implemented certain NCPF measures differently, requiring operators to alter their behaviour to be compliant in each jurisdiction.

> But from a compliance perspective it makes life very difficult for us if we've got multiple regulators asking for the same thing or slightly different things, it just adds to that regulatory burden. (WSP, very large corporate bookmaker, NT licensed)

WSPs identified that compliance with the NCPF measures may differ depending on the size of the operator. For example:

- It was harder for smaller operators to make the necessary technical changes to be compliant with regulations as they as they had fewer resources compared to larger operators.
- If a small operator's actions breached the NCPF's requirements and this led to a fine, it could be a higher proportion of their revenue, so they had less capacity to absorb it than larger operators.
- The restrictions on inducements measure may have a greater impact on smaller or less established operators as they may rely more heavily on promotional incentives to attract and retain customers.

> And at the end of the day, unfortunately, the way that the market's going, there's been a major downturn in the smaller bookmakers and I've got some intel on that and brands are dying and the only way to survive is offer[ing] inducements. (WSP, on-course bookmaker, Victorian licensed)

An unintended consequence of regulation and compliance activities is that it can have a disproportionate impact on smaller wagering operators, compared to larger ones. One regulator stated that small WSPs can still pose risks and harms to customers and thus the same compliance obligations should apply to them.

Consumer experiences of non-compliance

The consumer survey conducted for this evaluation asked last 12-months online wagerers for their experiences with measures, with indicators of WSP non-compliance with some aspects of 7 NCPF measures. Many consumers did not recall receiving an activity statement, some reported being induced to open an account or to not close their account, not being asked to set a deposit limit and receiving direct marketing after closing their account. See **Appendix D** for detailed results. These survey findings indicate WSPs may not be complying with their obligations under the NCPF and proactive compliance activities may be warranted.

The time taken to conduct complaint investigations and resolve them is significant. For example, a review of the NTRWC-published decisions made between November 2019 and 2025 found the average time from a complaint relating to the restriction on inducements measure being lodged and it being resolved was just over 501 days. In addition, the NSW regulator reported that the 12 complaints, since 2020, related to deposit limits had each taken an average of 168 days to be resolved.

Regulators noted that complaint resolution time depends on the nature and severity of the issue, ranging from disputes about WSP terms and conditions to potential breaches of legislation. Suspected breaches may trigger an investigation, including issuing notices to produce information, reviewing that material and assessing whether to proceed with legal action.

An interview with a help-providing organisation revealed that, in their experience, consumers were usually expected to attempt to resolve complaints with WSPs prior to approaching regulators and that this can be time-consuming and stressful for clients who have experienced gambling harm.

More proactive compliance activities have the potential to reduce this burden on consumers and regulators through activities such as audits, as well as WSPs regularly providing information to regulators to show they are meeting their legislative obligations. It could also assist with resolving consumer complaints in a timely manner.

Were the measures implemented consistently across jurisdictions?

Key findings

- The NPS consists of 71 principles across the 10 measures. All measures were implemented, with a high degree of consistency across jurisdictions in their timing and features. Six of the measures (restrictions on credit and payday lenders, customer verification, CGM, staff training and the NSER) were implemented consistent with the NCPF principles, although staff training and the NSER did not meet the 18-month implementation time frame.
- Implementation of the other 4 measures (restrictions on inducements, account closure, deposit limits and activity statements) aligned with their related NCPF principles, with the exception of 6 principles. These were principles 15, 17, 24, 35, 38 and 47 (as numbered in this report). The wording for 5 of these principles was ambiguous and there was oversight in the detail of one principle. This resulted in inconsistent guidance between jurisdictions. One principle was not actioned, namely a feasibility study for a centralised pre-commitment system to be commissioned and considered by governments. A centralised deposit limit scheme would enable wagerers to set a deposit limit that applied across all online WSPs.
- WSPs have not aligned their implementation of CGM with that measure's full guidance. Where there was inconsistent implementation across jurisdictions, this resulted in inconsistent levels of protection provided to consumers.
- State and territory governments should improve the consistency of measures by aligning legislation, regulations and operational guidance to ensure all Australian consumers receive the same minimum level of protection.

The main features of most measures were implemented consistently by jurisdictions, albeit with variation in timing. Both regulators and WSPs noted that they aimed for consistency in the NCPF measures.

> There was some discussion at the time with all these measures on specific wording so that we wouldn't be inconsistent and there was consultation with industry as well

> to make sure that even where there were differences, there wasn't [sic] any instances where complying in one jurisdiction would make you breach in another because I think that was what we were desperately trying to avoid. (Regulation stakeholder, state/territory government)

One regulator noted that they sometimes provided additional clarity or interpreted certain measures differently, which may have led to jurisdictional differences in how compliant behaviour was defined.

> Even when the Commonwealth put some guidance out on [messaging in marketing and advertising] ... the sort of sometimes rigid rules and rigid guidance in some aspects didn't quite fit the way [WSPs] did things and that's why they sort of weren't sure about whether they were going to be compliant or not ... We have to come up with a position basically, on what we think is the best outcome [with each measure] and that's just the way it works in general. (Policy & regulation stakeholder, state/territory government)

WSPs noted that inconsistency imposes regulatory burdens on WSPs and can be confusing for consumers.

> From the point of view of achieving national consistency, I think the experience with activity statements is it creates difficulties for us if one state chooses to do something that the other states don't necessarily require. Because obviously we don't operate on a state-by-state basis ... So ideally, you want them all aligned, so they're all asking you to do the same thing. (WSP, very large corporate bookmaker, NT licensed)

While the NCPF aims to provide consistent minimum consumer protection measures, it gives all jurisdictions the flexibility to provide enhanced protections 'provided that these changes do not conflict or modify or replicate without policy grounds the intended operation of the National Framework' (DSS, 2018, p. 19). Some jurisdictions have operationalised stronger protections – for example, NSW has additional restrictions around wagering inducements.

The interjurisdictional differences across measures stem largely from legislative variations of the NPS principles and where the legislation in certain jurisdictions combines multiple measures (i.e. direct marketing after opt-out or account closure). These legislative variations mostly resulted from the wording of principles being open to interpretation; for example, use of the word 'should' rather than 'must'. Further information is available in **Appendices E and F**. Interviewed WSPs also reported inconsistencies arose due to lack of specific guidance about measure implementation.

The following section provides findings and recommendations for 5 of the 10 measures aimed at improving both consistency and the level of protection offered. The involvement of the Australian Government may assist with coordination.

Restrictions on inducements

Key findings

- Jurisdictions interpret inducements differently, with several providing consumer protections that are stronger than the NCPF. However, different jurisdictional interpretations may result in minimum consumer protections varying across states and territories.
- This inconsistency means there are differences in permitted behaviour depending on the geographic location of the consumer. This problem will require active management as the wagering industry introduces new types of inducements.
- Some WSPs require customers to consent to direct marketing to open an account, undermining the intended model. Victoria, SA and WA resolved this in their legislation but other jurisdictions have not yet addressed this issue.

Recommendations

- **Recommendation 3a:** (N) Australian and state and territory government policy makers and regulators should work together to adopt consistent definitions of online wagering inducements, including for any new types of inducements introduced by wagering operators, to be reflected in legislation as appropriate.
- **Recommendation 3b:** (N) State and territory policy makers should explore and work toward increased consistency in restrictions on offers of inducements, given some jurisdictions already have stronger protections.
- **Recommendation 3c:** (C) State and territory policy makers and regulators should adopt a national model that ensures direct marketing may only be sent to customers who have provided their express consent to receive this material and that all customers can open online wagering accounts without needing to consent to direct marketing.
- **Recommendation 3d:** (R) State and territory policy makers and regulators should adopt a nationally consistent requirement that WSPs cease sending direct marketing materials immediately upon receipt of an unsubscribe request, with a consistent maximum time frame to accommodate processing.

The restrictions on inducements measure contains several elements:

- Inducements cannot be offered to open an account or refer another person to open an account.
- Any inducements that encourage customers to wager that are not part of an approved loyalty program must not be offered in a jurisdiction that only permits such inducements as part of an approved loyalty program.
- Winnings from complementary betting credit (i.e. bonus bets) 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. For direct materials sent electronically, the link to unsubscribe must be functional and easily accessible. No further direct marketing materials may be sent to a consumer from the time their unsubscribe request is received (DSS, 2018).

See **Table 1** for an overview of this measure as outlined in the NPS.

Development and implementation

The 2019 NCPF Baseline Study found that the majority of large WSPs offered incentives to open accounts, with the most common being bonus bets ranging from $50 to $200. However, only 40.2% of wagerers had seen an unsubscribe option on any direct marketing messages (Jenkinson et al., 2019).

The Regulatory Impact Statement (RIS) provided 3 options for this measure (see **Table 7**), with option 2, the establishment of minimum standards for restricting inducements, being chosen for implementation. Most wagering industry stakeholders supported this option, with the majority supporting a total ban on sign-up offers and the removal of turnover requirements for deposited funds (DSS, 2017). However, they did not support the move to opt-in direct marketing.

The NPS establishes that direct marketing must only be sent to customers who 'express consent' to receive it (DSS, 2018). This does not ensure the system operates on an opt-in basis as outlined in **Table 7** as a lack of response is viewed as consent.

Table 7: Summary of the options identified in the Consultation RIS

Option number	Description
Option 1	Current arrangements: no changes (base case)
Option 2	Minimum standards for restricting inducements**:** banning sign-up offers, better defining inducements in line with responsible gambling and creating an **opt-in system**: stronger consumer protection standards (minor regulatory impact)
Option 3	Banning all inducements: most stringent consumer protection approach (major regulatory impact)

Source: DSS (2017)

The NPS specifically allows for the introduction of more restrictive rules for this measure (DSS, 2018). NSW, SA, Vic and WA each have more restrictive additional guidance for certain aspects of this measure.

- **WA** and **NSW** prohibit advertising any inducements to wager, excluding direct marketing to betting account holders (WA Department of Local Government, Industry Regulation and Safety, 2025; Liquor & Gaming NSW, 2025).
- **SA** prohibits offering inducements that encourage gambling but this does not apply to loyalty programs (SA Attorney-General's Department, 2021).
- As of 30 June 2023, **Vic** mandated that direct marketing be governed on an opt-in basis. Consumers are required to actively confirm that they seek to receive direct marketing and are otherwise assumed to have not consented (Victoria Government Gazette, 2022).
- **WA** prohibits communications being sent by a third-party affiliate on behalf of a WSP. Operators cannot require customers to consent to direct marketing to open an account (WA Department of Local Government, Industry Regulation and Safety, 2025).

Inducement definition consistency

The O'Farrell Review (2015) noted a fragmented regulatory approach regarding the definition of inducements. The RIS suggested harmonising the definition of 'inducement' in each jurisdiction. This was intended to assist with ensuring the minimum consumer protections provided by this measure were consistently regulated (DSS, 2017). However, it was omitted from the NPS (DSS, 2018) and was not pursued further when implemented across jurisdictions.

Submissions to the House of Representatives Standing Committee on Social Policy and Legal Affairs (SPLA; 2023) *You win some, you lose more. Inquiry into online gambling and its impacts on those experiencing gambling harm* continued to comment on the need for a consistent regulatory approach and interpretation of what constitutes a wagering inducement (Entain, 2023; Soulio, 2023; Sportsbet, 2023). In the evaluation interviews, WSPs and regulators confirmed that jurisdictional definitions of inducements continue to differ significantly, increasing the compliance burden of WSPs operating across jurisdictions.

> The problem is no one can actually determine what an inducement is ... is that an inducement or is that just a good offer? Trying to define what is an inducement is a very difficult thing to do. (Policy & regulation stakeholder, state/territory government)

> The regulation in the NCPF – it's pretty straight forward. Where inducements get trickier is that … most states have a different interpretation of what an inducement is and [apply] different guidance and regulations and that's sort of a daily battle for us in terms of when we want to run a promotion or anything that we want to offer to our customers. (WSP, very large corporate bookmaker, NT licensed)

The desktop review found the written definition of inducement remains similar across jurisdictions, with most referring to 'any credit, voucher or reward' offered by wagering operators. However, the interpreted definition diverges, with jurisdictions divided on certain offers or promotions.

> I think the challenge now is that definition of an inducement … some people will say that … the money back on a race is an inducement and some people won't class that as an inducement … And I suppose the perfect example … is like an enhanced odds market. That's something that we have used in the past … and [for] some states that will be OK. Whereas in [one state] for example … they don't like that kind of thing as much. (WSP, medium corporate bookmaker, NT licensed)

The implementation of the measure itself appears to have a high level of consistency. However, the underlying definitional differences mean that the provision of some inducements may be considered non-compliant with the NCPF in some jurisdictions and compliant in others. As a result, consumers may experience different minimum protections in certain jurisdictions.

Policy makers and regulators have the opportunity to harmonise their interpretation of inducements to create stronger and more consistent consumer protections around inducements. This could include a standardised interpretation of inducements and other promotions that are banned in the NCPF. The definitions should be updated across regulators when new types of inducements introduced by WSPs are identified as being in-scope under this NCPF measure.

The consumer survey run for this evaluation found that of those who closed an account in the last 12 months, 28.6% were encouraged or induced by a WSP to not close their account and 10.7% said the process to close their account did not begin immediately after the request.

Opt-in or opt-out direct marketing

This measure was implemented so that customers only received direct marketing materials if they had provided consent to receive them (DSS, 2018). An opt-in approach was the intended outcome of the option selected during the Decision RIS (DSS, 2017). This evaluation notes that

every jurisdiction has implemented the direct marketing measure with the intended opt-in component as suggested in the NPS (DSS, 2018).

However, interviewed regulators noted that under the model, WSPs could require that consumers consent to marketing to open an online wagering account. For wagerers opening accounts with these specific WSPs, the model then functions more as an opt-out model, where individuals may be required to opt in to marketing to open an account, then undergo additional steps to unsubscribe from it.

Only SA, Vic and WA have explicitly addressed this possible oversight in their implemented model, as detailed below.

In jurisdictions that have not explicitly addressed this gap, individual WSPs appear to be able to ignore the intended operation of the opt-in model when they implement the measure by requiring consumers to consent to direct marketing to open an account. Individual WSPs that require customers to opt in to open an account undermine the 'express consent' provision of the NPS principle (numbered 15 in this report) that '*All direct marketing to customer may only be sent to customers who provide their express consent to receive this material.'*

Victoria initiated a change in July 2022 that required WSPs to allow consumers to open accounts without consenting to marketing or being required to take additional steps to opt out of marketing. The model provides stronger consumer protection than the system initially adopted as it gives consumers more control and may reduce their exposure to direct marketing. This model was formally adopted by SA in March 2023, Vic in June 2023 and WA through legislation in February 2025.

Regulators in other jurisdictions noted that the change had mostly addressed this issue across jurisdictions due to Victoria's PoC regulatory model placing this obligation on all WSPs providing services to Victorian residents.

> There are a number of things that ... are on the list for cleanup ... one of the obvious ones, I think was one that Victoria picked up quite early and made changes in theirs, which I think has largely resolved it, but that was around requiring people to pick the box saying that they provide consent to receive marketing as part of the inducements measure and so, one of the requirements was around providing consent and Victoria found that you couldn't open an account without providing consent. So yes, there was a tick a box [system], but you couldn't open an account without ticking that box and so, I think they cleaned that up quite quickly. (Policy & regulation stakeholder, state/territory government)

No assessment has been undertaken on whether WSPs follow the stronger model. Adopting the opt-in model would harmonise direct marketing of inducements under the NCPF and strengthen consumer protections to direct marketing exposure. See **Table 11 in Appendix E** for more detail on inconsistencies pertaining to the differences in legislation for the direct marketing principle of this measure.

The NPS's principle (numbered 17 for the purposes of this report) requires that '*No further direct marketing materials may be sent a consumer from the time their unsubscribe request is received.'* However, in some jurisdictions, direct marketing materials can still be received up to 5 days after the request is received. Thus, implementation is inconsistent across jurisdictions and should be rectified.

Account closure

Key findings

There is a lack of national consistency in the length of time WSPs have to stop sending direct marketing material to consumers after they receive the unsubscribe request from consumers. Regulators and consumers reported WSPs continued to send direct marketing materials to consumers after they had closed their account and that consumers could easily re-open their account. Consumers also reported experiencing confusion around account closure, account suspension, self-exclusion and the 'take-a-break' consumer protection tools offered by WSPs.

Recommendations

- **Recommendation 4a**: (R) State and territory policy makers should adopt a nationally consistent model of account closure where the account is completely closed and not easily recoverable and that this is actioned by WSPs as soon as reasonably practicable, with a consistent maximum time frame to accommodate processing.
- **Recommendation 4b**: (R) State and territory policy makers should agree to provide consistent information to customers about the differences between account closure, account suspension, self-exclusion and taking a break.

This measure mandates that the process for closing an online wagering account be easy, readily available and accessible. This measure also ensures that account closures are immediate, with exceptions around pending bets. WSPs are unable to encourage or induce a customer to keep their account open during the closure process. Operators are also prohibited from direct marketing to individuals after receiving a request to close an account (DSS, 2018). However, some inconsistencies between jurisdictions were identified with the length of time after account closure where direct marketing is still permitted (see **Table 11 of Appendix E**). See **Table 1** for an overview of this measure as outlined in the NPS.

Development and implementation

The NPS's principle (numbered 24 in this report) requires that '*An interactive wagering service provider must not directly promote or market to a customer following the closure of the customer's account.'* However, in some jurisdictions, direct marketing materials can still be received up to 5 days after the request to close the account is received. Thus, implementation is inconsistent across jurisdictions and should be rectified.

In addition to closing accounts, other options for customers to cease or pause their betting is by registering with the NSER or by selecting the 'take a break' feature offered by WSPs. The latter feature must be offered by WSPs that are licensed in the NT (*Code of Practice for Responsible Service of Online Gambling 2019* (NT)).

Several interviewed WSPs discussed their use of different tools such as 'deactivation' and 'take a break'. One WSP referred to all these tools as 'account closure options'. Interviewed regulators reported inconsistencies between how operators present these options.

> What we're finding is mostly with words like deactivation and self-exclusion, closure, take a break. All these words broadly, there's no definition that's the standard. So, we find that one operator might have 'deactivate' as 'actually close', but another operator will have 'deactivate' as 'take a break'. So, there's no, like, a set standard and what we're seeing

> with industry, they'll have all these different terminologies across big and small operators and there's no standard because everyone has their own interpretation of what these things mean.– (Policy & regulation stakeholders, state/territory government)

Financial Counselling Australia's (FCA) submission to the House of Representatives Standing Committee on Social Policy and Legal Affairs *You win some, you lose more Inquiry into online gambling and its impacts on those experiencing gambling harm* (SPLA, 2023) found wagerers reported feeling confused about the differences between closing an account and placing themselves on self-exclusion registers. The FCA found that some wagerers believed they had closed their account and would be fully restricted from online wagering; however, they were able to simply reopen an account and continue wagering (FCA, 2023).

> I'm hearing … customers are often having trouble with account closure and it's more of a holding or a suspension as opposed to a closure … People are saying that when they've tried to close the account that … you go through this whole process, but the account isn't actually closed. It's kind of there in stasis. And it's not 'take a break' ... it's almost like it's just sitting there with no money … and no activity, but it still exists. (Gambling harm advocacy body)

The lack of clarity around the account deactivation features appears to be a barrier to this measure's intended purpose of increasing simplicity and clarity.

Deposit limits

Key findings

Jurisdictions have not implemented this measure consistently, with only 2 jurisdictions (ACT and Tas) making it mandatory for WSPs to offer deposit limits for the 4 time periods in the NPS (daily, weekly, fortnightly and monthly).

Recommendations

- **Recommendation 5a:** (**C**) State and territory policy makers and regulators should align their legislation and guidance to be consistent with the NCPF requirement to make it mandatory for WSPs to offer deposit limits for 4 time periods: daily, weekly, fortnightly and monthly.
- **Recommendation 5b:** (**C**) The DSS should commission a multi-operator deposit scheme feasibility study.

The voluntary opt-out pre-commitment scheme (deposit limits) provides consumers with a tool to help monitor and manage their wagering by allowing them to set limits on the amount they deposit in an online wagering platform. Under this measure, wagering operators are required, at a minimum, to actively promote deposit limits to customers during account setup. The NPS provides that deposit limits must be offered for a range of periods including daily, weekly, fortnightly and monthly.

Deposit limits are binding and an operator must not accept deposits over what the customer has set for the specific time period. Customers may adjust their deposit limits. Requests to decrease a limit will take effect immediately, while requests to increase a limit are implemented after a 7-

day delay. Offering other types of limits (e.g. spend limit) is optional (DSS, 2018). See **Table 1** for an overview of this measure as outlined in the NPS.

Development and implementation

The majority of state and territory governments enacted this measure within a year of the National Framework's commencement (by November 2019) through existing laws, regulations and licences. However, inconsistencies in implementation have occurred across jurisdictions and wagering operators.

Jurisdictions have not implemented this measure consistently in their legislation and other guidance. Only 2 jurisdictions made it mandatory for WSPs to offer deposit limits for the 4 time periods specified in the NPS (ACT and Tas). In other jurisdictions, the number of time periods offered by WSPs is at their discretion. **Table 12 of Appendix E** shows the differences that exist between jurisdictions.

Some operators reported that daily, weekly, fortnightly and monthly deposit-limit time periods are now standard, while others offer fewer or additional options, creating inconsistency.

> I think at the moment every service provider is kind of doing their own thing when it comes to promoting various different tools and various different measures. And I think that's inherent because we all have different tools and we all have slightly different measures. So, you know, we have one, 7, 14-day, 30-day deposit limits. Some operators might have 3-day deposit limits in addition to that. So, it kind of depends, I guess I think there is a real opportunity for some of that to be a little bit more coordinated. (WSP, large corporate bookmaker, all S/T licensed except WA)

This lack of uniformity can confuse consumers and make it harder to understand and manage deposit limits across platforms. It may also restrict access to time periods that better suit individual wagering patterns.

> We should acknowledge that there are a proportion of customers who ... choose to have multiple accounts because different bookmakers have different offerings and so to expand to their interests, it's appropriate for them to have multiple accounts … If I have a deposit limit on both accounts, it's a bad customer experience if it's calculated one way in one bookmaker and one way in another and that leads to customer contact and confusion. (WSP, very large corporate bookmaker, NT licensed)

One principle (numbered 38 in this report) relating to deposit limits has not been undertaken: '*Governments will assess the feasibility and costs of a centralised pre-commitment system, taking into account the costs and benefits for consumers (feasibility study)*' (DSS, 2018).

The Implementation Governance Committee (IGC) agreed to defer this work so it could be informed by the implementation of the NSER. The Australian Government has advised it will coordinate with jurisdictional partners to reconsider the case and timing for assessing feasibility, drawing on learnings from the NSER and other NCPF measures (DSS internal communication, 2025). A centralised deposit scheme would enable online wagerers to set a deposit limit that applied across all WSPs. Such a facility could provide enhanced protection to wagerers.

The consumer survey run for this evaluation found that, of those who opened a wagering account in the last 12 months, 20.5% were not prompted to set a deposit limit. Of those who set a deposit limit, 10.7% were able to deposit more than the deposit limit set. Of those who had an

account for 12 months or longer, 59.7% did not recall being prompted to set or review a set deposit limit in the last 12 months.

Regulators do not appear to be undertaking investigations on deposit limits. These consumer survey findings suggest that compliance activities may be warranted for deposit limits.

Activity statements

Key findings

- Activity statements offered by WSPs vary significantly from each other and from the Behavioural Economics Team of the Australian Government (BETA) template.[5] Differences include how activity statements present inducements, the font colour applied to wins and losses and the use of CGM. Stakeholders largely supported greater consistency for this measure.
- Victoria reviewed the activity statement measure shortly after it was implemented and revised its guidance in 2023 to introduce more prescriptive requirements that largely aligned with the BETA model.

Recommendation

- **Recommendation 6:** (**R**) State and territory policy makers and regulators should adopt nationally consistent and prescriptive requirements for activity statements that align with the modified version of the BETA template and the requirements under the NPS.

The activity statements measure requires that WSPs provide active customers with a monthly statement detailing their betting activity to assist them to monitor their wagering with that operator and to encourage self-reflection. The NPS required activity statements to be clear and to contain specific information on betting activity including expenditure, number of bets placed and wins and losses (DSS, 2018).

Statements must be emailed each month that a customer has actively bet and be available on their online wagering account at any time. Additional provisions around access and the format of statements apply. WSPs must also provide customers with a record of their betting account transactions through their online 'My Account' window and upon request via email or post (DSS, 2018). See **Table 1** for an overview of this measure as outlined in the NPS.

Development and implementation

All jurisdictions implemented activity statements largely in line with the NPS requirements. However, Victoria diverged slightly from other jurisdictions in 2023 by more tightly defining activity statement requirements (DSS, 2018; VGCCC, 2024).

This measure was intended to be implemented within 18 months from the commencement of the NCPF (by May 2020). The date of effect in most jurisdictions was July 2022, with WSPs in some jurisdictions granted further extensions to later in 2022. Delays were due to needing to commission research to inform the implementation of the measure (BETA, 2020) and extended consultation with industry.

[5] The template currently provided to WSPs has been altered slightly from the original BETA prototype. It is published on the DSS website: Activity Statement Prototype

Measure consistency

Australia's approach to online wagering activity statements was a world first (FCA, 2023). The measure was primarily informed by a commissioned research project undertaken by the BETA (BETA, 2020). The resulting report found evidence that viewing activity statements led to reduced amounts being wagered and that participants in the research strongly supported receiving monthly activity statements. The BETA prototype was updated to incorporate feedback received from WSPs and peak bodies.

The BETA prototype was not mandated for WSPs but instead promoted as a best practice template in the guidelines issued by DSS, as well as in state guidelines for operators (DSS, 2017; 2018). Providers that wanted to use a different format had to ensure their design was compliant with the NPS principles for activity statements.

One interviewed regulator noted that mandating the BETA prototype was considered by the ICG but did not proceed and that a more prescriptive model may have improved the consistency of activity statements. Most stakeholders interviewed supported the principle of increased consistency for this measure.

> The activity statements started off well ... we were actually designing a pro forma that we wanted all operators to use. And then they loosened that ... but I think operators would have appreciated an actual pro forma they could have used that was consistent across the board. (Policy & regulation stakeholders, state/territory government)

Several regulators noted activity statements had significant inconsistencies across WSPs. One area of inconsistency was how bonus bets and inducements are presented. In several activity statements provided to the AGRC, the distinction between inducements provided by WSPs and money spent by consumers on wagering was not clear.

The NPS (DSS, 2018) did not provide any guidance on how inducements should be treated in activity statements. Several WSPs stated that this lack of guidance increased their compliance burden. Some interviewees also noted that this may mislead consumers about their real wagering losses.

> The feedback [from clients] is that some activity statements are not that easy to read … it depends on which company, some activity statements can be sending the wrong information. It [is] not clearly marking your real wins, [when] it could be your real losses. They [WSPs] include the bonus bets, free offers and free credit they've offered to you [in the activity statement] to make your losses look like they're smaller than they really [are]. (Gambling help provider)

There are also inconsistencies in the use of colour across operators, with brand colours often used in graphs. Activity statements provided to the AGRC and the consumer interviews show operators also sometimes use green to show wins. This is contrary to the NPS principle (numbered 47 in this report), which establishes that statements '*should use red text to show losses and black to show wins (no use of green text)*' (DSS, 2018), although the prescriptiveness of the word 'should' is unclear. This could have contributed to guidance on activity statements having been implemented differently across jurisdictions, with several substituting 'must' for 'should' (see **Table 13 of Appendix E**).

Further jurisdictional inconsistencies were noted around whether operators could ask for a password for a consumer to access their activity statements (see **Table 14 of Appendix E**).

While several interviewed consumers saw the use of passwords as a barrier to the use of activity statements, WSPs largely expressed their support for them as a privacy measure. This could be attributed to differing interpretations of accessibility as suggested by the NPS principle (numbered 43 in this report) that activity statements '*must be accessible by a customer … on request at any time by email*' (DSS, 2018).

VGCCC measure review and changes

In 2022, the VGCCC reviewed the activity statements used by several WSPs operating in Victoria. They identified many of the previously mentioned inconsistencies, such as the unclear treatment of inducements and the inconsistent use of text colour for wins and losses across WSPs (VGCCC, 2023).

Victoria issued new guidance and expectation guidelines for WSPs to follow in 2023 (VGCCC, 2024). These guidelines are more prescriptive and were designed to ensure activity statements were closer to the BETA model, which remains an example template for WSPs to adopt. Changes included:

- requiring operators to distinguish between financial inducements and other losses incurred by consumers
- mandating the use of black for wins and red for losses, with green expressly prohibited
- requiring activity statements to rotate the safer gambling taglines introduced under the CGM measure.

Other regulators stated they believed that these changes would also impact the activity statements offered in their jurisdictions as WSPs would have to alter their activity statements to comply with Victoria's PoC model. However, interviewed WSPs and the activity statements provided to the AGRC show the Victorian changes have not been adopted by all WSPs in other jurisdictions.

> We're now in a situation where if you're in Victoria you get a particular form of activity statement and if you're in any other state or territory then get a different form to the Victorian one. (WSP, medium betting exchange, NT licensed)

Consistent gambling messaging

Key findings

- There were delays in implementing the CGM measure due to a dependency on the completion of 3 research studies commissioned by the DSS to inform its design.
- Additional guidance was provided to WSPs on when the CGM taglines needed to be displayed and the volume and tone at which CGM were to be delivered after the initial implementation of the measure.
- CGM implementation by WSPs is not fully consistent with the guidance provided by jurisdictions. Clarifying this guidance is expected to improve the impact of CGM.
- Consumers were more likely to be aware of and use protective measures when they appeared as calls to action in CGM.

Recommendations

- **Recommendation 7a:** (**R**) State and territory policy makers and regulators should refine guidance on CGM requirements to support nationally consistent adoption by WSPs.

- **Recommendation 7b**: (R) CGM taglines should place more emphasis on calls to action to encourage greater use of consumer protection tools.

This measure requires all marketing content for online wagering operators to include 1 of 7 prescribed safer gambling taglines. Websites and apps dedicated to online wagering are also required to include these taglines. There are strict requirements governing the display of these messages, including around the font size, the rotation of the messages and their length in televised or broadcast advertising. All messages must also be accompanied with a 'call to action' (DSS, 2018). **Figure 7** below shows the different tagline requirements on different platforms for this measure.

Figure 7: Consistent gambling messaging tagline requirements by platform

Taglines	TV/Video	Radio	In-app	Digital advertising	Print advertising	Social Media	Website	Other*
Chances are you're about to lose.	●	●	●	●	●	●	●	●
Think. Is this a bet you really want to place?			●	●	●	●	●	●
What's gambling really costing you?	●	●	●	●	●	●	●	●
What are you prepared to lose today? Set a deposit limit.			●	●	●	●	●	●
Imagine what you could be buying instead.	●	●	●	●	●	●	●	●
You win some. You lose more.	●	●						●#
What are you really gambling with?	●	●	●	●	●	●	●	●

Key: ● Permitted for use

*Other includes direct marketing materials or other sponsorship, outdoor advertising, promotional and in-stadium advertising

#Only available for telemarketing (or other spoken forms) of advertising

Source: DSS (2022b)

Development and implementation

Research and testing were undertaken to inform the taglines (DSS, 2017). The first research piece was a behavioural research trial regarding gambling messaging commissioned by Gambling Research Australia (GRA) and undertaken by Central Queensland University (CQU). This trial found little difference in outcomes between test messages, with the most important factor for reducing gambling harm simply having a responsible gambling message (Rockloff et al., 2021).

Hall & Partners (H&P) was then commissioned to produce 2 consecutive behavioural research pieces to develop and test new taglines. Hall & Partners first developed taglines grouped under themes relevant to online wagerers (H&P, 2021). The taglines were then subject to market testing, with those having the highest ratings among consumers recommended for implementation under the CGM measure (H&P, 2022).

The public health academic who was interviewed for the NCPF evaluation expressed some dissatisfaction with the process following these research pieces.

> What you had was ... an initial piece of work that was done by CQU ... and that was fine, I think that was a good starting point, but I would say too it was a limited starting point, in that I mean it didn't pretend to be anything more than the sort of summary document that ... they were asked to produce. (Public health academic)

The NPS (DSS, 2018) stated CGM was supposed to be in effect 6 months from the completion of trialling and testing of its features. This was met by most jurisdictions.

The DSS produced FAQs to assist with implementing CGM in November 2022 which were updated 3 times (DSS, 2024). In 2023 Victoria implemented revised requirements that WSPs licensed in Victoria must rotate CGM taglines in activity statements as expected by the guidelines.

Compliance

Some post-implementation compliance issues appear to have been resolved through engagement between regulators and WSPs. However, the CGM measure has not been implemented by WSPs in a manner consistent with the CGM guidelines.

The evaluation conducted an environmental scan of websites and apps to check for compliance with CGM requirements. **Appendix G** provides the criteria used for this scan along with detailed findings.

The scan found all websites and apps, with the exception of one, had CGM messaging but there were several areas where many platforms did not comply with the CGM implementation guidelines.

Of the 40 platforms (websites and apps), 50% were compliant with the CGM requirements[6] (excluding messaging size requirements, which are analysed separately). Apps had a much lower compliance rate than websites (35% versus 65% respectively).

On-course bookmakers were significantly less likely to be compliant than corporate bookmakers, betting exchange services and TABs (33.3% versus 54.8% respectively). Smaller brand products (those whose app version had less than 1,000 downloads in the Google Play Store) were also less likely than those with over 1,000 downloads to be compliant (35.7% versus 54.2% respectively).

In June 2023, Liquor & Gaming NSW issued show-cause notices to 2 WSPs due to breaches of the CGM measure on television advertising relating to reduced volume and an altered tone for the CGM tagline (Liquor & Gaming NSW, 2023). Many cautions were also issued by NSW. Other enforcement actions may have occurred that were not collected by this evaluation.

In sum, the findings from this evaluation are that the CGM measure was implemented comprehensively as all WSPs had taglines attached to their messages. However, compliance with specific details of the guidance, such as font and placement, were poorer. Consideration should be given to revisiting the implementation guidance to ensure it facilitates compliant WSP behaviour. Providing graphical assets consistent with the CGM design principles may assist WSPs with complying with CGM requirements. As an example, free digital images for health warnings, health promotion inserts and on-product health messages are available to manufacturers, packagers, suppliers and retailers of tobacco products to help them comply with the legislative requirements (Department of Health, Disability and Ageing, 2026).

Calls to action

The CGM measure requires that all taglines appearing online or in apps have a ‘call to action’ at the end of the tagline. There are 2 calls to action: ‘Set a deposit limit’ and ‘For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au’ (DSS, 2022a).

[6] Criteria used for classifying whether a product complied with CGM requirements was derived from DSS documentation. Allowances were made for deviations from strict adherence to the requirements as spelled out where it was within the intentions of the measure.

The call to action seems to have been somewhat effective based on consumer survey data and GambleAware Helpline data.

The consumer survey conducted for this evaluation found that, for online wagerers seeing or hearing the taglines in the past 12 months, 7.1% were prompted to set a deposit limit and 3.1% to review their deposit limit.

The GambleAware Helpline is a NSW-based service that answers calls from clients. The national 1800 number routes callers to state and territory services. There was a 53.7% increase in calls received between 2022–23 and 2023–24 (see **Table 8**).

The Gambling Help Online website is a national website with state and territory specific pages. The website displays both the Helpline telephone number and offers a chat function. There was a 44.5% increase in chat requests between 2022–23 and 2023–24.

Table 8: Gambling Help Online contacts, April–March 2022–23, 2023–24, 2024–25

Time Period	GambleAware Helpline (NSW)	Gambling Help Online (Australia)
April 2022–March 2023	15,818 calls received	7,746 chat requests
April 2023–March 2024	24,314 calls received	11,190 chat requests
April 2024–March 2025	17,936 calls received	12,488 chat requests

Three changes occurred to the services over 2022 to 2025: procurement and transition to a new NSW helpline provider (January 2023), the Gambling Help Online website was redesigned (July 2023) and a requirement was removed for clients to provide personal or demographic information prior to accessing online chat.

It appears that the increase in calls and chat requests may have been due to the call to action advertised in the CGM. The increase in chat requests may also have been due to removing an access barrier, with clients no longer needing to provide information prior to being able to chat.

There was no call to action that referenced the NSER as the NSER was implemented after the CGM. There was also relatively low awareness of the NSER. AGRC found that only 33.5% of people who had placed bets in the past 12 months were aware of the NSER (Sakata et al., 2025).

The NSER statutory review (Eccles, 2025) recommended various strategies to improve awareness of the NSER. One of these recommendations was that:

> References to the NSER be made prominent in the consistent gambling messaging measure of the National Consumer Protection Framework for online wagering. This could include a reference to the NSER on gambling taglines and a QR code for direct access to the NSER.

Greater use of calls to action within the taglines has the potential to assist wagerers in positively changing their behaviour by adopting consumer protection tools.

Unintended consequences

Gambling with illegal offshore WSPs

As part of the impact assessment for any new regulation, consideration needs to be given to the likelihood of it generating unintended consequences (Office of Impact Analysis, 2023).

While regulations aim to protect the community from gambling harm, they can also result in unintended consequences. Regulations are generally designed so that unintended consequences are avoided where possible. Part of the reason for undertaking this evaluation is to examine if unintended consequences have occurred due to the regulations and if change is needed to address any issues.

Wagering regulations prohibit WSPs from offering online gambling on casino-style games (*Interactive Gambling Act 2001* (Cth)). This type of restriction may cause Australians to access these products on offshore gambling sites. Concerns were expressed by some stakeholders that regulations on Australian licensed WSPs have the potential to drive some customers to wager on illegal offshore sites without the same level of consumer protections. The NCPF was designed from the outset with this risk in mind.

RWA commissioned a report by H2 Gambling Capital (RWA, 2025) that noted that the illegal offshore gambling market is growing. The United Kingdom Gambling Commission (UKGC) has undertaken extensive work to try to estimate the size of the illegal market and has been unable to develop reliable current expenditure estimates, with forecasting being even more problematic (UKGC, 2025a; UKGC communications, 2025). There is insufficient reliable data available to determine if gamblers are moving to offshore providers in response to regulations.

An interviewed gambling help provider found that people seeking help primarily wagered with licensed Australian operators rather than offshore providers. Desktop review, interviews and surveys undertaken for this evaluation reflected continued broad support for regulations that protect gamblers and the community from harms associated with gambling.

5. Conclusion and next steps

The NCPF introduced minimum protections for online wagerers that were largely nationally consistent for the first time. It plays a crucial role in preventing and reducing online gambling harm and reflects substantial interjurisdictional cooperation.

The Phase 1 evaluation found that the measures were largely implemented as intended and delivered broadly consistent protections across jurisdictions. However, full implementation took nearly 6 years rather than the planned 18 months, indicating that the original time frame was unrealistic.

Moreover, the evaluation shows that the National Framework can be strengthened through clearer legislation, more coordinated oversight, improved consumer communication and education about the measures and improvements in operational policies for the measures.

The recommendations in this report provide a clear and actionable roadmap for enhancing national consumer protections for online wagering. Timely action on these recommendations will further build the protective capacity of the NCPF and support safer online wagering environments for all Australians. **Figure 8** provides a guide to the time frames for implementation. WSPs compliance with the changes may be subsequent to this time frame, depending on the time WSPs need to modify their systems to meet their obligations.

Phase 2 evaluation

As with Phase 1, the Phase 2 evaluation will be guided by the theory of change developed in the PRES (Communio, 2018). It will use a mixed-methods research approach. The evaluation will draw on data collected during Phase 1. It will also gather additional literature and desk research, undertake additional interviews with stakeholders, collect data from WSPs, conduct

an environmental scan of wagering accounts to examine measures such as customer identity verification and registration with the NSER and use secondary data sources such as longitudinal survey data.

Phase 2 will focus on determining whether the NCPF and its measures for online wagering have had the intended impact of reducing risky wagering behaviours and minimising gambling-related harm in Australia. Its scope includes providing recommendations to refine and improve the measures.

The ability to measure change in wagering behaviour and gambling-related harm must be considered in light of the extended and uneven implementation of NCPF measures, with several measures introduced or refined well beyond the original implementation time frame and limited baseline or ongoing monitoring data available. These factors constrain the extent to which changes can be confidently attributed to individual measures or to the framework as a whole.

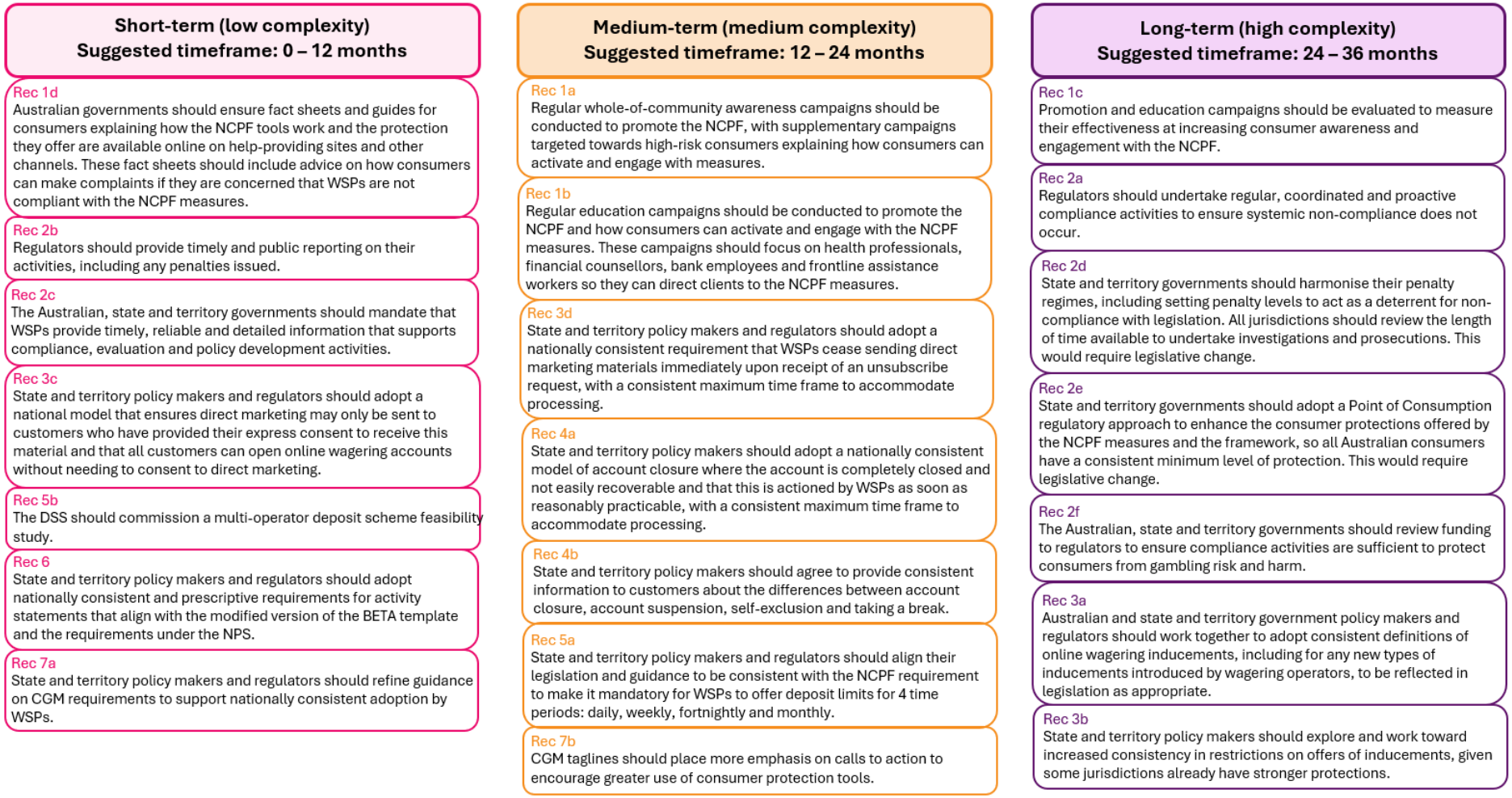
Phase 2 will therefore adopt a cautious and methodologically proportionate approach, drawing on multiple data sources, longer time series as measures mature and contribution-based analysis rather than simple attribution. This approach is intended to strengthen confidence in findings while transparently acknowledging the limits of what can be measured given the implementation context.

The data from Phase 1 and information collected in Phase 2 will be used to support reporting on risk, harm and measure refinement recommendations. The Phase 2 report is due to be finalised by June 2027. As with Phase 1, some evidence gaps are likely to result from the measures being implemented and refined over almost 6 years, with most not having monitoring data collected. Thus, some findings may not be attributable to individual measures and instead may apply to the whole of the framework.

Next steps

The Phase 1 report can be actioned separately to the Phase 2 report. It is expected that the Phase 2 report will contain recommendations that will require more policy consideration by jurisdictions as they will be aimed at using the existing measures to further reduce risk and harm to Australians.

Figure 8: Suggested time frames for recommendations



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Gambling and Racing Control (Code of Practice) Regulation 2002 (ACT)

Gaming and Wagering Commission Regulations 1988 (WA)

Gambling Regulation Act 2003 (Vic)

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Appendix A

Numbered Principles of the NPS (DSS, 2018)

Prohibition of lines of credit – 3 principles (fully implemented)

5. Credit must not be offered or provided by an interactive wagering service provider to their customer.
6. An on-course bookmaker, who is an interactive wagering service provider, is exempt from this measure, but only for that bookmaker's telephone-based betting service.
7. A review of the operation of the credit betting prohibition (including its exemption) is to be conducted.

Payday lenders – 4 principles (fully implemented)

8. Small amount credit contracts must not be advertised or marketed on an interactive wagering service provider's website.
9. An online wagering consumer must not be referred to a credit provider to finance their wagering activity.
10. Information related to an online wagering consumer must not be provided to any credit provider.
11. The above applies to the affiliated organisations of an interactive wagering service provider, as well as their related body corporate(s).

Customer verification – 4 principles (fully implemented)

12. Customers must be verified within a maximum 72-hour period prior to continue using an online wagering account. This verification period will change to a customer pre-verification measure after the National Self Exclusion Register (NSER) is operational.
13. Interactive wagering service providers must return all deposited funds and close an account immediately if a person is verified as a person under 18 years of age.
14. Customers are not able to withdraw winnings prior to positive verification of their identity.
15. Evidence must be provided that customer verification measures adhere to the 'know your customer' requirements.

Restrictions on inducements – 7 principles (5/7 fully implemented)

16. The offer of any credit, voucher, reward, or other benefit as an incentive to open an account or refer another person to open an account is prohibited.
17. Any credit, voucher, reward, or other benefit (that is directed at encouraging customers to gamble) that is not part of an approved loyalty program must not be offered in a jurisdiction that only permits such inducements as part of an approved loyalty program.
18. 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.

19. All direct marketing to customers may only be sent to customers who provide their express consent to receive this material.
20. A customer must be able to unsubscribe from receiving direct marketing materials. For direct marketing materials sent electronically, the link to unsubscribe must be functional and easily accessible.
21. No further direct marketing materials may be sent to a consumer from the time their unsubscribe request is received.
22. The above principles for this measure apply as minimum requirements only. Additional restrictions on inducements may continue to apply, or be enacted, including in relation to its advertisement, by individual jurisdictions.

Account closure – 6 principles (5/6 fully implemented)

23. The process for account closure must be prominent and clearly articulated on the interactive wagering service provider's website and within each customer's 'My Account' window.
24. The process for account closure must be simple.
25. A customer must be able to request the closure of their account via the same channels available to them to place a bet, in addition to via email and telephone.
26. The account closure process must commence immediately upon receipt of the account closure request and result in the account being closed after all bets have been settled.
27. A customer must not be encouraged or induced to keep their account open following their request to close their account. However, an interactive wagering service provider may explain the effects of an account closure and ask the customer if the customer wishes to proceed.
28. An interactive wagering service provider must not directly promote or market to a customer following the closure of the customer's account.

Voluntary opt-out pre-commitment scheme – 14 principles (12/14 fully implemented)

29. A voluntary pre-commitment scheme must be easily accessible and effectively promoted to consumers.
30. A customer must be prompted to set a deposit limit during the account sign-up process.
31. Limits must be binding.
32. An interactive wagering service provider must at least offer deposit limits, with other types of limits (e.g. spend limit) optional.
33. An interactive wagering service provider must not accept further deposits from a customer above the deposit limit set by the customer.
34. A request by a customer to decrease their deposit limit must be applied immediately.
35. A request by a customer to increase their deposit limit must not be applied until 7 days after the day the request was received.
36. All customers must be prompted to set and review their deposit limit yearly at a minimum, including customers who have chosen not to set a limit (with further enhancement considered after trialling and testing).
37. The prompt must occur at the time of a 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. A customer is deemed to have an active betting account if the customer has made a transaction on their betting account within the preceding 12 months.

38. 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.
39. Customers must be able to choose the time period for their deposit limit from a range of periods, including daily, weekly, fortnightly and monthly.
40. A customer must be able to set and change their deposit limit via the same channels available to them to place a bet, in addition to being able to set or change their deposit limit in writing.
41. The availability of the pre-commitment scheme should be promoted beyond initial account sign-up, with education and awareness of the scheme shown on an interactive wagering service provider's website and its promotional material.
42. Governments will assess the feasibility and costs of a centralised pre-commitment system, taking into account the costs and benefits for consumers (feasibility study).

Activity statements – 10 principles (9/10 fully implemented)

43. While a customer has an active betting account, an interactive wagering service provider must provide an activity statement to the customer via email, on a monthly basis.
    - A customer is deemed to have an active betting account if the customer has made a transaction on their betting account within the statement period.
44. Activity statements must provide information that is clear and easily understood using common terms that customers are familiar with.
45. Activity statements must include segmented information clearly showing monthly information on betting activity and account transactions about:
    - amount spent
    - wins and losses
    - number of bets placed
    - overall net win/loss for the specified period of the activity statement
    - opening and closing balances
    - deposits and withdrawals
    - the account balance
    - a column graph to illustrate wagering activity comparing amount spent against net result over time for the last 6 months (cumulative), and shows a clear comparison tracking to the same time from the last year
    - links and information on support services and safe gambling messaging that promotes available consumer protection tools.
46. Activity statements must be accompanied by a link to a customer's transaction list.
47. Activity statements must be accessible by a customer:
    - on request at any time by email or telephone and in a format of the customer's choosing (i.e. e-statement or paper statement)
    - online via their account at any time (only for those customers who are able to place a bet online).
48. Activity statements must not be sent to inactive accounts. An inactive account is an account that has not had a betting activity for more than 12 months.

49. Activity statements must be provided free of charge, except where a customer elects for delivery by mail, in which case the costs purely associated with this may be recovered from the customer.
50. In addition to activity statements, a record of betting account transactions must also be available:
    - immediately at all times via a customer's 'My Account' window for customers who bet online
    - by email or post for customers who bet through other means (e.g. via telephone) within 14 days of the customer's request for a copy of their account transactions.
51. Activity must not include any promotional or direct marketing information. They should use red text to show losses and black to show wins (no use of green text).
52. At a minimum, customers (including a person whose betting account has been closed) should be able to access a record of their account transactions for the preceding 7 years.

Consistent gambling messaging – 4 principles (fully implemented)

53. Interactive wagering service providers must provide a set of gambling messages for industry to use in its advertising nation-wide.
54. The same approved gambling message(s) must be used in connection with any interactive wagering service, including as it relates to the following:
    - within their customers' 'My Account' window
    - on their websites and internet applications
    - on direct marketing materials
    - on print and broadcast advertising
    - on any sponsorships and promotional activities.
55. State and territory governments will be able to tailor the gambling message(s) to their own campaigns.
56. Recognising that terminology of messaging is crucial as a consumer protection measure; the approved gambling message(s) will be designed:
    - in collaboration with experts (harnessing new and existing research)
    - in consideration of the jurisdictions in which they will be displayed
    - in consideration of the messages being easily understood by the wide range of consumer groups who make up the intended audience.

Staff training – 4 principles (fully implemented)

57. 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 to create a culture of responsible gambling within the organisation.
58. Of these staff members, online training program must be undertaken by:
    - new staff within one month of commencing work with the interactive wagering service provider but before interacting with a customer about, or influencing, the provision of a service
    - existing staff within 6 months of the online training program coming into effect.

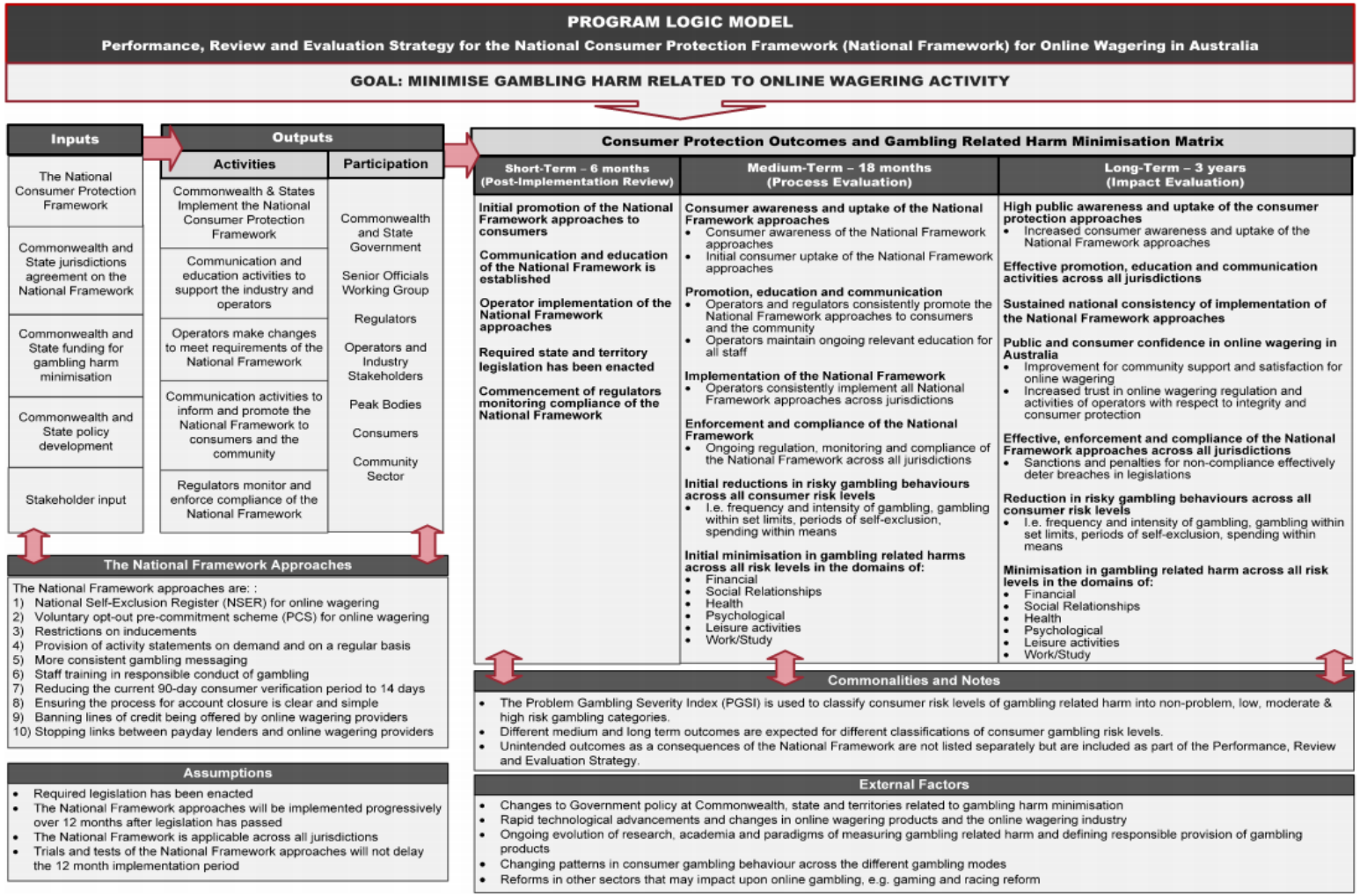
59. All staff who have undertaken the approved online training program must undertake an annual refresher training course to refresh content knowledge and information on any recent changes in consumer protection and/or gambling harm.
60. The approved online training program (including refresher training course) must be industry funded.

NSER – BetStop – 15 principles (fully implemented)

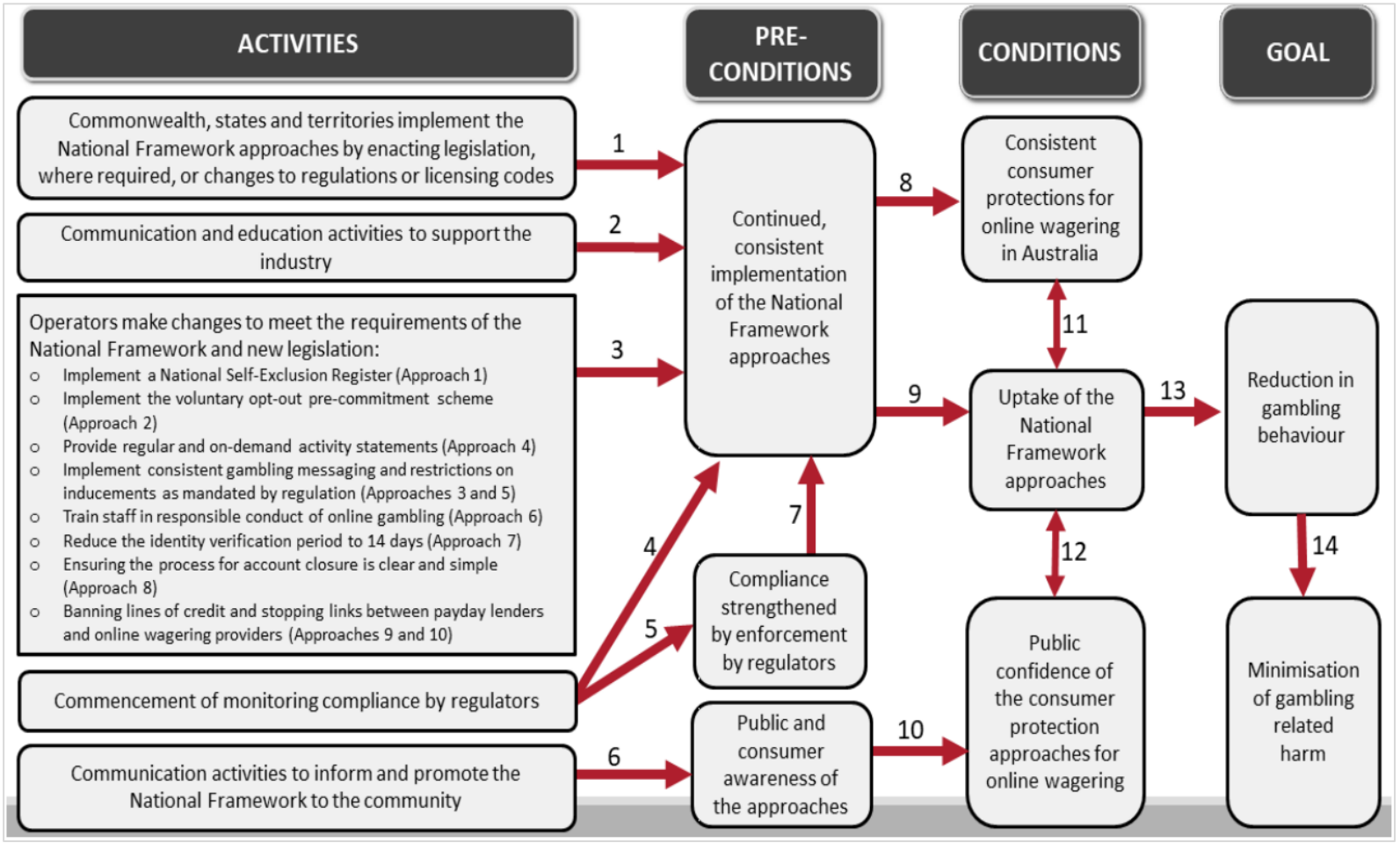
61. The NSER must operate to allow a consumer to self-exclude from all interactive wagering services in a single process.
62. The NSER must be quick and simple for a consumer to apply to, and must take immediate effect upon registration/sign-up.
63. The NSER is to be effectively promoted so consumers are educated about self-exclusion and aware of the scheme.
64. The NSER must be offered across all phone and web-based digital platforms.
65. The NSER must allow a consumer to choose their exclusion period, ranging from 3 months to permanent exclusion.
66. The NSER must afford a consumer the option to enter a sponsor (e.g. a friend or family member), who will be notified at the end of their exclusion period.
67. Information on gambling support, financial and counselling services, and information about land-based self-exclusion tools, must be made available to a consumer at the time a consumer nominates to self-exclude.
68. Information on gambling consumer protections must be made publicly available and accessible.
69. An interactive wagering service provider is prohibited from providing any marketing and/or promotional material to a consumer who is registered for self-exclusion, during the period of self-exclusion.
70. Upon registration for self-exclusion, all funds held in a consumer's active accounts must be returned to that consumer once all wagers/bets are settled – the account must then be closed.
71. A process for revoking a consumer's registration for self-exclusion must be available to consumers.
    - A consumer must see a counsellor, and provide evidence of this, as a prerequisite for revocation.
    - A 7-day cooling off period applies before revocation can take effect.
72. A consumer seeking to wager online must actively approach each interactive wagering service provider to open a new wagering account after the customer's exclusion period has ended.
73. The NSER must be industry-funded.
74. The NSER will be built with the capability to also exclude consumers on the basis of an interactive wagering service/product.
75. A review of the NSER will be conducted at the end of the first 12-month period of operation to ensure the system is meeting its objectives, and to determine whether any additional in-built functionality should be activated.

Appendix B: Program logic model and theory of change

(Source: Communio, 2018, Figure 1, page 20)



(Source: Communio, 2018, Figure 2, page 28)



Appendix C: Phase 1 evaluation matrix

Table 9: Phase 1 evaluation matrix

Evaluation question	Indicator/s	Metric/s	Data source/s
Has the National Framework been implemented as intended?	Alignment of National Framework implementation with planned implementation in the National Policy Statement (2018)	▪ Timeliness: Date milestone/s for actual implementation vs planned implementation ▪ Efficiency: Actual vs planned processes utilised in implementation ▪ Refinement in measures from planned to actual implementation	Desk research; Information from key government stakeholders; Stakeholder interviews
	Stakeholder satisfaction of implementation of measures	▪ Feedback on implementation of the National Framework from a range of key stakeholders involved in the implementation	Stakeholder interviews
	Operator websites and apps comply with CGM requirements.	▪ Measure 9. WSP websites/apps comply with requirements for CGM	Environmental scan
	Suggested improvements to the measures	▪ Academic literature suggested improvements to measures ▪ Key stakeholder suggestions for improvement to the measures ▪ Regular online wagerers' suggestions for improvement to the measures	Desk research; Rapid literature review; Stakeholder interviews; Consumer interviews
Were the measures implemented consistently across jurisdictions?	Consistent regulator guidelines across Australian states/territories for minimal requirements of measures	▪ All Australian states and jurisdiction have same guidelines for implementation of the minimal requirements for the National Framework measures	Desk research; Information from key government stakeholders; Stakeholder interviews
	Consistent operator implementation across Australian states/territories for minimal requirements of measures	▪ All operators across Australian states/territories consistently implementing the minimal requirements for the National Framework measures	Desk research; Information from key government stakeholders; Stakeholder interviews
	Additional requirements for measures by Australian states/territories	▪ Additional requirements for measures by Australian states/territories	Desk research; Information from key government stakeholders; Stakeholder interviews
Has the National Framework been consistently promoted, educated and communicated across all jurisdictions?	Consistent promotion, education and communication of the National Framework and measures by regulators across all jurisdictions	▪ Regulators across Cth and states/territories have all engaged similar promotion, education and communication activities for the National Framework and each measure to operators, public and consumers.	Desk research; Information from key government stakeholders; Stakeholder interviews
	Consistent promotion, education and communication of the National Framework and measures by operators across all jurisdictions	▪ Operators across all licensing jurisdictions and the industry peak body, have all engaged similar promotion, education and communication activities for the National Framework and each measure to: their staff, public and consumers.	Desk research; Information from key government stakeholders; Stakeholder interviews

Evaluation question	Indicator/s	Metric/s	Data source/s
What is the level of awareness of the NCPF measures by consumers?	Level of awareness of the National Framework and its measures by online consumers	▪ Online wagerers (last 12 months, at least monthly) awareness of the National Framework measures has increased since their implementation.	Consumer interviews; Consumer survey; Secondary data
What is the level of uptake of the NCPF measures?	Level of uptake of discretionary NCPF measures following their implementation	▪ Measure 4. Regular online wagerers not consenting/opting out of direct marketing from operators ▪ Measure 4. Last 12-month online wagerers unsubscribed from direct marketing in the last 12 months, either on account opening or afterward ▪ Measure 5. Regular online wagerers and last 12-month online wagerers closing online betting account/s in the last 12-months ▪ Measure 6. Regular online wagerers setting deposit limits, decreasing limits, or increasing limits ▪ Measure 6. Last 12-month online wagerers deposit limit setting last 12-months either upon opening an account or later, time frame set, deposit limit set and increasing or decreasing deposit limits ▪ Measure 7. Regular online wagerers and last 12-month online wagerers use of activity statements provided by operators	Consumer interviews; Baseline study; Consumer survey; Secondary data
How effectively have regulators been monitoring and enforcing operator compliance with the National Framework?	Regulator engagement in monitoring operator compliance with the NCPF measures	▪ Cth and states/territories compliance monitoring activities by measure and type of activity ▪ Cth and states/territories frequency of compliance monitoring activities	Desk research; Information from key government stakeholders: Stakeholder interviews
	Regulator enforcement of compliance with the NCPF measures	▪ Cth and s/t enforcement activities by measure and type of activity ▪ Cth and s/t cost ($AUD) to operators of enforcement activities	Desk research: Information from key government stakeholders: Stakeholder interviews
	Consumer experiences of implementation of measures	▪ Indicators of non-compliance with measures, last 12-month online wagerers.	Consumer survey
Are there any unintended consequences as result of the implementation of the National Framework?	Potentially adverse consequences	▪ Increase in offshore wagering following the implementation of NCPF measures ▪ Key stakeholder feedback on the impact on WSPs	Stakeholder interviews; Secondary data

Appendix D: Consumer experiences of NCPF measure non-compliance

Table 10: Consumer experiences of non-compliance with NCPF measures, last 12 months to July 2025 (Consumer Survey, % of weighted sample)

Measure	Measure principle	Metric of non-compliance	Sample	% sample
Prohibition of lines of credit	Credit must not be offered or provided by an interactive wagering service provider to their customer.	Offered or used credit from an online betting operator	Online wagerers	4.4%
Payday lenders	An online wagering consumer must not be referred to a credit provider to finance their wagering activity.	Referred to or used payday or short-term loan provided, which was from an online betting operator	Online wagerers	2.2%
Customer verification	The 72-hour verification period will change to a customer pre-verification measure after the National Self Exclusion Register (NSER) is operational.	During account sign-up process they were not required to submit proof of identity.	Opened an account last 12 months	16.1%*
Restrictions on inducements	The offer of any credit, voucher, reward, or other benefit as an incentive to open an account or refer another person to open an account is prohibited.	Offered an inducement by an online betting operator for opening an online betting account	Online wagerers	15.4%
		Offered an inducement by an online betting operator for referring another person to open an online betting account	Online wagerers	9.9%
	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.	Unable to withdraw winnings made from promotional bets without placing more bets	Online wagerers who made winnings	25.3%
	All direct marketing to customers may only be sent to customers who provide their express consent to receive this material.	During account sign-up was not asked for consent to receive direct marketing	Opened an account last 12 months	17.3%*
		Received direct marketing from operator after opting out at account sign-up	Opted out of direct marketing on account sign-up	16.4%*
	A customer must be able to unsubscribe from receiving direct marketing materials.	Tried to unsubscribe from direct marketing in the last 12 months, unsuccessfully	Online wagerers	4.2%
Account closure	The process for account closure must be simple.	Tried to close an online betting account, unsuccessfully	Online wagerers	1.7%
	The account closure process must commence immediately upon receipt of the account closure request and result in the account being closed after all bets have been settled.	The process of closing their account did not begin immediately after their request was received and active bets were settled.	Closed an account last 12 months	10.7%*
	A customer must not be encouraged or induced to keep their account open following their request to close their account.	After requesting their account be closed, they were encouraged or induced to not close their account by the betting operator.	Closed an account last 12 months	28.6%*

Measure	Measure principle	Metric of non-compliance	Sample	% sample
	An interactive wagering service provider must not directly promote or market to a customer following the closure of the customer's account.	Received direct marketing from the betting operator after their account had been closed	Closed an account last 12 months	39.3%*
Deposit limits	A customer must be prompted to set a deposit limit during the account sign-up process.	Were not prompted during the account sign-up process to set a deposit limit	Opened an account last 12 months	20.5%
	Limits must be binding. An interactive wagering service provider must not accept further deposits from a customer above the deposit limit set by the customer.	Were able to deposit more than deposit limit set	Set a deposit limit (on sign-up for afterward)	10.7%
	All customers must be prompted to set and review their deposit limit yearly at a minimum, including customers who have chosen not to set a limit.	Were not prompted to set or review a set deposit limit in the last 12 months	Had an account for 12 months or more	59.7%
	A request by a customer to decrease their deposit limit must be applied immediately.	Request to decrease a set deposit limit was not applied immediately	Requested to decrease a set deposit limit	63.6%*
	A request by a customer to increase their deposit limit must not be applied until 7 days after the day the request was received.	Request to increase a set deposit limit was applied in less than 7 days	Requested to increase a set deposit limit	0.0%*
	A voluntary pre-commitment scheme must be easily accessible and effectively promoted to consumers.	Tried to set a deposit limit but were unable to	Online wagerers	0.49%
		Disagreed or strongly disagreed that online betting operators effectively promote setting deposit limits	Online wagerers	13.0%
Activity statements	While a customer has an active betting account, an interactive wagering service provider must provide an activity statement to the customer via email, on a monthly basis.	Did not receive an activity statement via email from operators for each month they were actively betting online	Online wagerers	36.7%
	Activity statements must provide information that is clear and easily understood using common terms that customers are familiar with.	Disagreed or strongly disagreed that activity statements provide information that is clear and easy to understand	Used an activity statement	6.3%*
	Activity statements must be accessible by a customer.	Disagreed or strongly disagreed that activity statements are easy to access	Used an activity statement	2.9%*

Notes: Excludes sample who did not have their own betting account (*n* = 20) or did not use a legal online WSP (*n* = 27). Online bettors (*n* = 641); Opened an account last 12 months (*n* = 80); Made winnings in the last 12 months (*n* = 226); Closed an account last 12 months (*n* = 37); Opted out of direct marketing on account sign-up last 12 months (*n* = 35); Set a deposit limit (on sign-up for afterward) last 12 months (*n* = 116); Had an account for 12 months or more (*n* = 607); Requested to decrease a set deposit limit in the last 12 months (*n* = 5); Requested to increase a set deposit limit in the last 12 months (*n* = 10); Used an activity statement in the last 12 months (*n* = 162). *Failed reliability test using Korn-Graubard 95% Confidence Intervals (modified for complex surveys from Clopper-Pearson method), as used with National Center for Health Statistics' *Data Presentation Standards for Proportions*.
Source: NCPF Online Consumer Survey (*N* = 698).

Appendix E: Jurisdictional legislation inconsistencies for NCPF measures

Measure 4. Restrictions on inducements and Measure 5. Account closure

Table 11: Summary of state/territory legislation for the direct marketing principle of NCPF Measure 4 and NCPF Measure 5 post-account closure

Jurisdiction	Legislation	Detail	Comment
National	National Policy Statement (2018)	No further direct marketing materials may be sent to a consumer *from the time their unsubscribe request is received* (2018).	Opting out of direct marketing should be immediate.
Vic	Gambling Regulation Act 2003 and ministerial directions GG2022S349.pdf and GG2023S137.pdf	A WSP or a person acting on behalf of the WSP must not send direct marketing to a person at any time after **5 business days** from the day it has received notification from that person that they have unsubscribed.	Opting out of direct marketing must be actioned within 5 business days. This includes when an individual unsubscribes by closing their account.
ACT	Gambling and Racing Control (Code of Practice) Regulation 2002	The licensee must ensure that the licensee's direct marketing is not sent to a person after **5 business days** from the date a request is received from the person to – (a) Stop getting the direct marketing; or (b) Close their betting account.	Opting out of direct marketing must be actioned within 5 business days. This includes when an individual unsubscribes by closing their account.
NSW	Betting and Racing Act 1998 NSW	The withdrawal of consent to receive gambling advertisements takes effect **24 hours** after a betting account holder notifies the licensed betting service provider that proves the account of the withdrawal consent.	Opting out of direct marketing must be actioned within 24 hours. This includes when an individual unsubscribes by closing their account.
NT	NT Code of Practice for Responsible Service of Online Gambling 2019	Where a person either unsubscribes from receiving direct marketing material, self-excludes or closes their account, the online gambling provider must not send marketing material to that person at any time after **24 hours** from the receipt of that request.	Opting out of direct marketing must be actioned within 24 hours. This includes when an individual unsubscribes by closing their account.
Qld	Wagering Act 1998 Qld	If the relevant person withdraws consent from receiving promotional or advertising material, the withdrawal takes effect **5 business days**, or a shorter period prescribed by regulation, after the relevant person withdraws consent.	Opting out of direct marketing must be actioned within 5 business days. This includes when an individual unsubscribes by closing their account.
SA	Authorised Betting Operations Gambling Code of Practice (SA)	An interactive WSP, or a person acting on behalf of an interactive WSP, must not send direct marketing to a person at any time after **5 business days** from the day it has received notification from the person that they have unsubscribed.	Opting out of direct marketing must be actioned within 5 business days. This includes when an individual unsubscribes by closing their account.
Tas	Tasmanian Gaming Licence Standards	Any loyalty program, incentive, promotion or inducement offered by a licensed provider must ensure that no further direct marketing are sent to an account holder at any time after **5 business days** from the time their unsubscribe request is received.	Opting out of direct marketing must be actioned within 5 business days. This includes when an individual unsubscribes by closing their account.
WA	Gaming and Wagering Commission Regulations 1988	An account holder is taken to have withdrawn their consent – (a) If the holder requests Racing and Wagering Western Australia (RWWA) to close their account – **24 hours** after the request was made.	Opting out of direct marketing must be actioned within 24 hours. This includes when an individual unsubscribes by closing their account.

Note: While the definition of inducements appears to be consistent across jurisdictions, the interpretation of these definitions varies as noted by regulators and WSPs in stakeholder interviews.

Measure 6. Voluntary opt-out pre-commitment scheme (deposit limits)

Table 12: Summary of state/territory legislation for the time period for deposit limit selection of NCPF Measure 6

Jurisdiction	Legislation	Detail	Comment
National	National Policy Statement (2018)	Customers must be able to choose the time period for their deposit limit from a range of periods, including daily, weekly, fortnightly and monthly (2018).	Appears **mandatory** to include all 4 time periods
Vic	Gambling Regulation Act 2003 and ministerial directions GG2022S349.pdf and GG2023S137.pdf	Allows the account holder to choose the period during which the deposit limit applies (e.g. a week, fortnight, calendar month or calendar year or a combination of these)	Appears **voluntary** to include all 4 time periods
ACT	Gambling and Racing Control (Code of Practice) Regulation 2002	Allows the person to choose the period or periods to which the limit applies, including a period or periods of 1, 7, 14 or 28 days	Appears **mandatory** to include all 4 time periods
NSW	Betting and Racing Act 1998 NSW	Before the account is opened, the provider must require the potential betting account holder to indicate the limit on the amount of money that the holder may deposit into the betting account in a specified period and the **period** for which the particular limit is to apply (a deposit limit) or, if the potential holder does not wish to apply a limit, to expressly refuse to apply a deposit limit.	Does not appear to state the time periods
NT	NT Code of Practice for Responsible Service of Online Gambling 2019	Online gambling providers must ensure they offer a number of different time periods for which a deposit limit is to apply; for example, a day, week, fortnight, month or year, or a combination of these.	Appears **voluntary** to include all 4 time periods
Qld	Wagering Act 1998	Licence conditions contain information about deposit limits. The betting account must not be opened unless the person or account holder has set a deposit limit. Further supported in the Wagering Control Manual that the deposit limit is 1, 7, 14 or 28 days.	Appears **mandatory** to include all 4 time periods
SA	Authorised Betting Operators Gambling Code of Practice	Allows the account holder to choose the period during which the relevant limit applies (e.g. a week, fortnight, calendar month or calendar year or a combination of these)	Appears **voluntary** to include all 4 time periods
Tas	Tasmanian Gaming Licence Standards	Account holders must be able to nominate the applicable time period for their deposit limit from a range of periods, including daily, weekly, fortnightly and monthly limit options.	Appears **mandatory** to include all 4 time periods
WA	Gaming and Wagering Commission Regulations 1988	Allow the holder to choose the duration for which the deposit limit applies from **at least 2 options** offered by Racing and Wagering WA, including, for example, the following – (i) 1 day; (ii) 1 week; (iii) 1 fortnight; (iv) 1 month	Different to other states/ territories

Measure 7. Activity statements

Table 13: Summary of state/territory legislation for the format (text colour) of activity statements of NCPF Measure 7

Jurisdiction	Legislation	Detail	Comment
National	National Policy Statement (2018)	They **should** use red text to show losses and black to show wins (no use of green text) (2018).	The use of the word **'should'** indicates that these principles are **recommended.**
Vic	Gambling Regulation Act 2003 and ministerial directions GG2022S349.pdf and GG2023S137.pdf	Activity statements **must** use red text to show losses and black to show wins and **must** not use green text.	The use of the word **'must'** indicates that these principles are **mandatory.**
ACT	Gambling and Racing Control (Code of Practice) Regulation 2002	(2) An activity statement for a betting account – (a) **must** set out the following information in legible black text on a white background: (i) the number of winning bets; (ii) the net amount gained from betting; and (b) **must** set out the following information in legible red text on a white background: (i) the number of losing bets; (ii) the net amount spent on betting; (iii) the total amount spent on betting; and (c) **must** not set out any information in green text.	The use of the word **'must'** indicates that these principles are **mandatory.**
NSW	Betting and Racing Act 1998 NSW	Activity statements **should** use red text to show losses and black to show wins. Green text **must** not be used.	The use of the word **'should'** indicates using red text to show losses and black text to show wins in activity statements is **recommended.** The use of the word **'must'** indicates that it is **mandatory** to not use green text.
NT	Code of Practice for Responsible Service of Online Gambling 2019	Does not specifically mention the colour of text to be used in the activity statements	The absence of this principle may lead to operators **ignoring the principle.**
Qld	Confidential	Not provided	Not applicable
SA	Authorised Betting Operators Gambling Code of Practice	Red text or shading must be used to show losses on an activity statement and detailed transaction history and black text to show wins. No use of green text or shading to depict wins is permitted on an activity statement or detailed transaction history.	The use of the word **'must'** and phrasing **'no use'** indicates that these principles are **mandatory**.
Tas	Responsible Gambling Code of Practice	Does not specifically mention the colour of text to be used in the activity statements	The absence of this principle may lead to operators **ignoring the principle.**
WA	Gaming and Wagering Commission Regulations 1988	(d) only uses red text or red shading to show losses; and (e) only uses black text to show wins; and (f) does not use any shading to show wins	The phrasing **'only uses'** indicates that these principles are **mandatory.** However, the legislation does not mention provisions around the use of green text.

Table 14: Summary of state/territory legislation for the use of a password or security measure to access activity statements of NCPF Measure 7

Jurisdiction	Legislation	Detail	Comment
National	National Policy Statement (2018)	Activity statements must be accessible by a customer: • on request at any time by email or telephone and in a format of the customer's choosing (i.e. e-statement or paper statement) • online via their account at any time (only for those customers who are able to place a bet online) (DSS, 2018).	The statement 'accessible at any time' is unclear and open to interpretation. It is also unclear whether the statement accessible through email can also require consumers to open their wagering account.
Vic	Gambling Regulation Act 2003 and ministerial directions GG2022S349.pdf and GG2023S137.pdf	If the activity statement is sent by email, a wagering service provider must ensure that … the account holder is **not required to complete additional security checks** to open the activity statement, such as a password (Victoria Government Gazette, 2022).	Statements must be accessible **without requiring passwords**.
ACT	Gambling and Racing Control (Code of Practice) Regulation 2002	The licensee must ensure the account holder can access the activity statement without needing to use any kind of security measure, **other than a security measure used to access the account holder's email account or online betting account**. (*Gambling and Racing Control (Code of Practice) Regulation 2002* (ACT), s 1.20Q).	Operators **can require certain passwords** or security measures to access statements.
NSW	Betting and Racing Act 1998 NSW	If the activity statement is sent by email, the licensed betting service provider must ensure that … there **are no additional security checks needed** to open the activity statement, such as password protection (NSW Government Gazette, 2022).	Statements must be accessible **without requiring passwords**.
NT	Code of Practice for Responsible Service of Online Gambling 2019	Does not specifically mention the use of passwords to access activity statements.	The absence of any restrictions indicates that operators **can require certain passwords** or security measures to access statements.
Qld	Confidential	Statements are accessible via an email with a link to access and download a copy of their activity statement, or via regular post to the postal address recorded on a player's account for customers without an email address.	Statements are accessible **without requiring passwords**.
SA	Authorised Betting Operators Gambling Code of Practice	The gambling provider must not implement layers of security, including a requirement for the use of a password, for an active account holder to access an activity statement (Consumer and Business Services, 2025).	Statements must be accessible **without requiring passwords**.
Tas	Responsible Gambling Code of Practice	If the activity statement is sent by email, a TGL holder must ensure that: … the account holder is not required to complete additional security checks to open the activity statement, such as a password. (TLGC, 2023, s 5.17).	Statements must be accessible **without requiring passwords**.
WA	Gaming and Wagering Commission Regulations 1988	For the purposes of subregulation (1), an activity statement is not easily available to be viewed if the account holder must enter a password to view the statement once the holder has accessed the account *(Gaming and Wagering Commission Regulations 1988, S. 40S)*.	**No mention** of whether a password can be required if an **activity statement is accessed through email**. Statements on websites must be accessible **without requiring passwords other than account passwords**.

Appendix F: Legislation and guidance for each NCPF measure

Table 15: Legislation and guidance for each NCPF measure

Measure	Principal policy document
Prohibition of lines of credit and payday lenders (Measures 1 and 2)	Cth: *Interactive Gambling Act 2001*
Customer verification (Measure 3)	Cth: Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (AML/CTF Rules)
Restrictions on inducements – provision of inducements (Measure 4)	Code of Practice: NT, SA, Tas, ACT Legislation: NSW, Qld Regulations: WA Ministerial direction/guideline: Vic
Restrictions on inducements – opt-in direct marketing (Measure 4)	Code of Practice: NT, SA, Tas, ACT Legislation: NSW, Qld Regulations: WA Ministerial direction/guideline: Vic
Account closure (Measure 5)	Code of Practice: NT, SA, Tas, ACT Legislation: NSW Regulations: WA Ministerial direction/guideline: Vic Licence Condition: Qld
Voluntary opt-out pre-commitment scheme (Measure 6)	Code of Practice: NT, SA, Tas, ACT Legislation: NSW Regulations: WA Ministerial direction/guideline: Vic Licence Condition: Qld
Activity statements – contents (Measure 7)	Code of Practice: NT, SA, Tas, ACT Regulations: WA Ministerial direction/guideline: Vic, NSW Licence Condition: Qld
Consistent gambling messaging (Measure 8)	Code of Practice: NT, SA, Tas, ACT Regulations: WA, NSW Ministerial direction/guideline: Vic Licence Condition: Qld
Staff training – required unit of training (Measure 9)	Code of Practice: NT, Tas, ACT Regulations: WA Ministerial direction/guideline: Vic, NSW, SA Licence Condition: Qld
National Self-Exclusion Register – Betstop (Measure 10)	Cth: *Interactive Gambling Act 2001*

Appendix G: Environmental scan criteria for meeting minimum CGM requirements on websites and apps

Sample

The environmental scan was conducted with a sample of 40 licensed Australian online WSP websites (*n* = 20) and mobile apps (*n* = 20) and examined WSPs' compliance with implementing the consistent gambling messaging (CGM) measure on their websites and apps according to the following guidelines:

- Consistent gambling messaging implementation plan (DSS, 2022a)
- Consistent Gambling Messaging Frequently Asked Questions (DSS, 2024)
- Supplementary Factsheet Consistent gambling messaging – platform definitions and permitted taglines (DSS, 2022b).

Criteria

The criteria for meeting minimum CGM requirements on websites and apps are summarised in the table below.

Table 16: Criteria for meeting minimum CGM requirements on website and in apps

<table>
<tr><th>Website</th><th>In app</th></tr>
<tr><td colspan="2">Taglines must be present in …</td></tr>
<tr><td><u>all of</u> the following:
▪ Last frame of a rotating carousel
▪ Header/ footer of website
▪ Responsible gambling sections</td><td>at <u>least one</u> of the following:
▪ Rotating carousel (any frame)
▪ Bottom of home page
▪ Below bet slip section</td></tr>
<tr><td colspan="2">Use one of the 6 following taglines for websites and apps:
1. Chances are you're about to lose
2. Think. Is this a bet you really want to place?
3. What's gambling really costing you?
4. What are you prepared to lose today? Set a deposit limit.
5. Imagine what you could be buying instead.
6. What are you really gambling with?</td></tr>
<tr><td colspan="2">Taglines must …</td></tr>
<tr><td>be accompanied with the standard call to action:
'For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au'</td><td>be accompanied by the shortened call to action:
'Set a deposit limit'</td></tr>
<tr><td>stand alone from other material on the website to be clearly visible and to not be confused with material related to wagering.</td><td></td></tr>
<tr><td colspan="2">be presented in
1. a clear, easy-to-read text with the largest possible font consistent across the whole message
2. black text on a white background
3. take up at least one-third of the message space (tagline and call to action each).</td></tr>
</table>

Detailed findings

Four of the 7 non-compliant websites were non-compliant due to a missing tagline in a static PDF on responsible gambling pages rather than a live webpage. All live html webpages analysed were compliant in this area, indicating that there is a lack of clarity among WSPs around static documents. Comparatively, only 1 out of the 13 (7.7%) non-compliant apps failed to meet these tagline placement requirements. This difference in compliance may reflect the difficulty in complying with varying requirements for implementing CGM on different platforms. Twelve out of the 13 apps used the incorrect call to action, with all 12 apps using the standard-length call to action (‘*For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au’)* instead of the shortened call to action (‘*Set a deposit limit’*) as required for apps.

Three apps and 3 websites were non-compliant due to presenting taglines with black text on a white background. The NCPF environmental scan allowed an exception for the use of blue font text where a hyperlink to consumer protection tools was used in the call to action. This design principle improves consumer accessibility to protection tools.

The CGM implementation plan (DSS, 2022a) and the FAQs updated in November 2024 (DSS, 2024) require that the tagline and call to action combined should occupy two-thirds or 66.7% of the screen at a minimum. None of the 39 taglines on the body of the homepages of the scanned products occupied the majority of the screen on either apps or websites. On average, the tagline and call to action text combined occupied just 1.57% of the screen.