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21 March 2022

The Manager

National Self-Exclusion Register Section

Australian Communications and Media Authority

Law Courts   
Melbourne VIC 8010

**Re: Response to ACMA’s Draft Register Rules**

Dear The Manager,

We appreciate the opportunity to provide feedback on the ‘Draft Register Rules’ (**the Rules**) relating the to the National Self Exclusion Register (**the Register**). This is an important initiative for consumers and interactive wagering providers (**IWP**) as it will provide protection to those experiencing harm and vulnerable customers participating in gambling activity across the industry.

Overall, Dabble supports the position that ACMA have made within these Rules and understand the underlying intentions.

Please see below our responses to the areas of comment you have requested.

**Issue for comment 1 – Verification Process**

Dabble supports the ACMA’s identity verification process to ensure consumers who are applying to be placed on the register. When considering if there are alternatives or barriers to entry for the Register operator, we feel there is not.

However, we are of the belief that the verification check (and alternative identity checking processes, if the consumer is not holding any valid government issued identification) need to be extremely timely to ensure consumers are not prematurely dropping out of the application process.

**Issue for comment 2 – Making Entries**

Dabble supports the suggested timeframes for the Register operator to add the consumer’s entry to the register.

**Issue for comment 3 – Managing entries and information requests**

Dabble supports the provision of the referenced consumer information to be sent to IWP’s, as all interactive wagering providers would have this information available.

The only barrier to entry that we can envisage is that the consumer providing their current details to the Register operator, and this may not fully match the details that IWP has on their database.

**Issue for comment 4 – Data Matching rules**

Dabble supports the decision not to include the data matching guidance within the Register rules.

The process undertaken by an IWP, to check against the Register for consumer details is extremely important to the overall efficacy of the Register.

However, it is still yet to be fully considered by industry, as to what are the most effective events for an interactive wagering provider to check the register.

We would not want to include this guidance (to be included in the Register rules) without proper consideration, as the ramifications on IWP’s would be significant. Not only would it be considered an offence under the IGA but also bares a financial cost to IWP’s, the cost recovery model is related to this process.

From the above, Dabble feels that it is appropriate that ACMA should (in consultation with industry) be releasing guidance on the above.

**Issue for comment 5 – Register Response times (Register operator responding to interactive wagering provider)**

Dabble supports the register response times when an interactive wagering provider is checking the Register.

Dabble would like to highlight that whilst there has been significant testing regarding the technical load the Register can absorb (with regard to requests by IWP), we do have concerns on peak industry days and the potential for the Register may not be able to maintain those response times to IWP.

**Issue for comment 6 – Actions an interactive wagering provider should take when they are aware of a customer/perspective customer is self-excluded and their efficacy.**

Dabble is in agreeance that IWP’s need to provide information to the consumer regarding their self-exclusion status.

However, in considering the efficacy of the above communications Dabble would like to highlight that a consumer will be receiving an email from every IWP at the time of self-exclusion.

If the intention of this notification is to solely communicate to the consumer the actions the IWP has taken regarding their existing account and support available, we feel this could be effective as there is a relationship in place. The IWP should advise the consumer that this will override any other self-exclusions that may already be existing on the consumer’s account.

Conversely, we also acknowledge the consumer may feel overwhelmed with all emails (from the IWP) and the messaging, and it may dilute the content regarding support service messaging.

**Issue for comment 7 – Promotion of NSER**

Dabble supports the promotion of the Register to consumers.

The location of message in subsection 24(2) is appropriate as it is consistent with all other messaging provided to consumers on IWP platforms. Further to this, the requirements of subsection 24 (3-4) regarding electronic messaging also is adequate.

Dabble feels that it would be beneficial to the community to include information regarding the Register on television advertising campaigns. This is due to the wide-reaching audience and as well as providing awareness of help options to third parties or support people if they know someone at risk of experiencing harm from gambling.

With respect to wording IWP’s should use, Dabble suggests it needs to be simple and in plain English for community members to easily understand. We also feel that IWP’s should include information regarding the Register in languages than English on their platforms.

Problem gambling is considered a public health issue and therefore needs a similar response to manage ill effects of it. State commissioned advocacy campaigns (e.g. Victorian Responsible Gambling Foundation), are now encouraging consumers to talk about their gambling behaviours with medical providers and others.

It is from this basis that Dabble feels that information about the Register needs to be promoted beyond the industry and by the health industry.

Information should be available in all health support services such as GP’s, mental health providers, financial counsellors and other support services whereby consumers may present in crisis due to ongoing problematic relationships with gambling.

This will provide the health industry with an additional resource to use when approached by consumers who seek treatment and stop their problematic gambling behaviour.