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**Submission of the Synod of Victoria and Tasmania, Uniting Church in Australia to the Draft Rules for the National Self-Exclusion Register**

**22 March 2022**

The Synod of Victoria and Tasmania, Uniting Church in Australia, welcomes the opportunity to provide a submission on the Draft Rules for the National Self-Exclusion Register.

**Issue for Comment 1: Identity Verification Process**

The Synod supports that the Register operator should be allowed flexibility in the rules to verify a person’s identity in making an application to the Register operator. However, the Register operator must only accept identity documents and information that is robust enough to minimise the possibility of someone misusing another person’s identity. However, only one verification procedure should be required of a person to register, so that the registration process itself is not a deterrent to a person seeking to register.

**Issue for Comment 2. Suitability of the proposed period in which the Register Operator must add an individual to the Register after their identity has been verified.**

It is important to support a person who has made the decision to self-exclude by placing them on the Register as soon as possible. Given Section 10 covers the step of registering the person after they have had their identity verified, the Synod would prefer that the final step of registering the person is required to occur within the shortest possible time. Thus, 24 hours seems a long period and the Synod would prefer to see the requirement reduced to eight hours, so that it is required to happen in the working hours of the day on which the identity has been verified.

**Issue for Comment 4. Should guidance be included in the Register Rules on when a data-matching request should be undertaken?**

The Synod believes that every encouragement should be provided to interactive wagering providers (IWPs) to meet their required obligations under sections 61MA, 61KA and 61LA-61LC of the IGA. It is desirable that IWPs meet their obligations without the need for penalties to be imposed after they have breached their obligations. Thus, as one measure to encourage compliance, guidance should be included in the Register Rules on when a data-matching request should be undertaken. Other measures to encourage compliance will also be needed, such as IWPs ensuring their training of staff makes sure staff understand the obligations.

**Issue for Comment 5. Proposed timeframe for the Register operator to respond to a data-matching request from an IWP.**

The Synod supports that the Register operator be required to meet a standard of 97.5% of data-matching requests from IWPs being met within one second and 99.75% within five seconds.

**Issue for Comment 6. IWPs interactions with self-excluded customers.**

The Synod supports the information a IWP will be required to provide to a person who is on the Register and tries to open an account or place a bet. In addition, the Synod asks that the IWP be prohibited from encouraging, directly or indirectly, a person to deregister themselves from the Register. A person who has placed themselves on the Register and then attempts to open an account or place a bet is likely to be at a point of particular vulnerability at the moment they are trying to take those actions. The IWP should be assisting the person at that moment to take time to reflect on why they placed themselves on the Register and the possible harms they experienced that caused them to place themselves on the Register. The IWP must not exploit the moment of vulnerability to encourage the person to remove themselves from the Register.

A review of studies on self-exclusion found that people accessing self-exclusion frequently criticised the attitude of gambling provider staff. Staff were perceived as not sufficiently briefed on the process and did not provide reasonable sensitivity, encouragement or support.[[1]](#footnote-1)

The information that the IWP is required to provide to the person in section 23 of the draft Register Rules could easily be provided in a way that affirms the person’s decision to place themselves on the Register or in a way that seeks to undermine that commitment by the person.

**Issue for Comment 7. Promoting the Register to customers.**

The Synod believes that the Rules should specify the words the IWP is required to use to encourage people to consider use of the Register.It is also desirable for there to be consistent language in promoting the Register. The promotion of the Register should use font that is consistent with the rest of the content of a website or other electronic communication. In any video or radio advertising, the promotion of the register should be in the same voice and pace as the rest of the advertisement.

A 2018 systematic review of studies into self-exclusion recommended that promotion activities and information material about self-exclusion should address the motives for self-exclusion, such as financial issues or the role of significant others.[[2]](#footnote-2)

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1. Franziska Motka, Bettina Grüne, Pawel Sleczka, Barbara Braun, Jenny Cisneros Örnberg and Ludwig Kraus, “Who uses self-exclusion to regulate problem gambling? A systematic literature review,” *Journal of Behavioural Addictions 7(4), (2018): 911.* [↑](#footnote-ref-1)
2. Franziska Motka, Bettina Grüne, Pawel Sleczka, Barbara Braun, Jenny Cisneros Örnberg and Ludwig Kraus, “Who uses self-exclusion to regulate problem gambling? A systematic literature review,” *Journal of Behavioural Addictions 7(4), (2018): 913.* [↑](#footnote-ref-2)