



GAMBLING HARM LIVED EXPERIENCE EXPERTS

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[Language Guide](#)

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Australian Media and Communications Authority (ACMA)
Attn: Nerida O'Loughlin (CEO)
Level 3, 40 Cameron Avenue
Belconnen ACT 2617
Email: info@acma.gov.au

Further evidence - GHLEE submission to the ACMA's "Compliance and enforcement priorities 2026/2027"

Dear Ms O'Loughlin,

While Gambling Harm Lived Experience Experts (GHLEE) has previously lodged a [submission](#) to the ACMA's *Compliance and Enforcement Priorities 2026–2027*, we seek to provide further critical evidence and request that this correspondence be considered part of our formal submission.

We reference the following paragraph that formed part of our original submission, "*Breaches of BetStop obligations by gambling companies remain extremely concerning despite it seeming to be minimised to some degree in the review. For individuals who have self-excluded, receiving promotional material or unwanted contact from gambling companies can be highly triggering and emotionally distressing. ACMA itself has previously recognised the benefits of [self-exclusion programs](#), noting improvements in wellbeing among participants. When breaches occur, however, the harm caused can undermine the recovery process*".

Distressingly, those fears expressed by GHLEE above have materialised into tragic outcomes. We draw your attention to a recent ABC [radio interview](#) in which the sister of a man who died by suicide outlined the circumstances leading to his death. Central to her account was the relentless exposure to gambling advertising and inducements—even after he had self-excluded. This is not a marginal failure; it goes to the heart of regulatory effectiveness.

In this case, the ACMA has already found that Sportsbet breached Australian law by illegally contacting self-excluded customers. However, the imposition of a financial penalty in these circumstances is wholly inadequate.

The sequence of events is deeply troubling and must be confronted plainly:

- A customer experiencing gambling harm continues to lose money to Sportsbet
- The customer takes the step to self-exclude
- Sportsbet breaches the law by continuing to contact and induce that individual
- The individual, already vulnerable and distressed, takes his own life
- Sportsbet is fined for its illegal conduct

At this point, the regulatory response fails entirely.

Sportsbet does not pay fines in isolation. Fines are paid from company revenues—revenues derived directly from customer losses. This includes losses from individuals experiencing harm.

The unavoidable conclusion is this:

- Sportsbet broke the law.
- That unlawful conduct occurred in the context of a person experiencing gambling harm who subsequently took his own life.
- Sportsbet was fined.
- That fine is paid from the losses of its customers.
- Therefore, the individual who died has, in effect, contributed to funding the penalty imposed for the unlawful conduct that formed part of the circumstances surrounding his own death.

This is not accountability. This is a system that allows unlawful conduct to be absorbed, with fines effectively being a simple cost of doing business.

A financial penalty, even in the millions, is clearly not enough of a deterrent to companies who illegally prey on people because they are extracting inordinate amounts of money from them.

The reality for the gambling industry is that those experiencing the most harm are their best customers. If on the rare occasion a company is caught, penalised and required to pay fines essentially from the pockets of its own customers, it is a tiny price to pay. There is no real jeopardy for management. It's worth the risk of having to pay a fine because they rarely get caught, and when they do they can easily pay the fine out of their extraordinary profits.

GHLEE maintains that financial penalties alone are fundamentally insufficient where breaches involve vulnerable individuals, particularly those who have self-excluded. There must be meaningful consequences, including:

- personal accountability for senior executives
- licence suspension or cancellation for serious breaches
- mandated extensive public statements by companies identifying breaches
- sanctions that cannot be offset through ongoing customer losses

Without this, the regulatory framework remains structurally incapable of preventing harm, and tragically incapable of delivering justice when that harm results in loss of life.

Yours sincerely,

Gambling Harm Lived Experience Experts (GHLEE)



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