

Complaint and Investigation Assessment (CIA) for Interactive Gambling Matter

COMPLAINT/MATTER DETAILS

Date	15 September 2023
CRM Reference (i.e. complaint ID)	IGA-2023-02069 [REDACTED] (remainder are own motion)
URLs	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] https://www.goldenbet.com
Providers (registrant/advertiser/broadcaster)	Several (see Attachment A)
Name of services	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] Golden Bet
Relevant provision/s of the <i>Interactive Gambling Act 2001</i>	- Subsection 15(2A) – providing a prohibited interactive gambling service that has an Australian-customer link - Subsection 15AA(3) – providing an unlicensed regulated interactive gambling service that has an Australian-customer link
Relevant investigations in the last 12 months	N/A
Comments	
The ACMA recommends that investigations be commenced in respect of the above 10 services. These are to be commenced as own motion investigations, apart from the [REDACTED] service in which we received a complaint alleging that it is an interactive gambling service being provided to customers in Australia in contravention of subsection 15AA(3) of the IGA. This complaint is valid under Division 1 of Part 3 of the IGA. One of the ACMA's compliance priorities for 2023-24 is minimising gambling harm, which includes taking action against illegal offshore wagering providers targeting Australians, particularly during the WWC which took place during July and August 2023. The above services were identified by several means including complaints, staff's own compliance monitoring activities during the WWC as well as intelligence provided by [REDACTED] and [REDACTED]. Initial observations of the services indicated that they were offering markets on the WWC and offer in-play betting. They also provide casino-style services. The registration pages for the services default to Australia as a country to register from. Some services also provide the option to gamble in Australian dollars.	

According to data from [REDACTED], website traffic to the URLs between March and August 2023 was significant (see Attachment A), with traffic also spiking for majority of services during the time the WWC event was held.

For these reasons, it is recommended that the ACMA commence 10 investigations into the above services.

STAFF RECOMMENDATION

Section 21 of the *Interactive Gambling Act 2001* (IGA) provides that the ACMA, on its own initiative or in response to a complaint, investigate relevant IGA matters if the ACMA thinks it is desirable to do so.

- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]

Risk management

Having considered the *ACMA Risk Management Guide*, the operation level risk of investigating these matters is low:

Risk category and key examples	Key risk and consequence	Likelihood	Consequence
Compliance e.g. the matter: - is of significant public interest - may impact on the community at large - may be novel and/or have precedent value - may concern systemic non-compliance - may involve formal enforcement action - may raise concerns about the adequacy of the relevant provision or involve policy considerations	Decision and subsequent actions not adequately informed by Authority views / Level of compliance and safeguards not adequate and/or consistent	[REDACTED]	[REDACTED]
Stakeholder management e.g. the matter has, or may develop, strong community, political, media or industry sensitivity because, for example, of the issues raised, the context and/or broader environmental considerations	Stakeholder expectations not met and/or not managed at appropriate level / Reduced confidence in the ACMA and/or legislative framework	[REDACTED]	[REDACTED]
Regulatory and program delivery outcomes e.g. because of the issues raised, the matter has, or may reveal unintended regulatory outcomes, or may reveal issues with regulatory drafting or enforcement mechanisms	Decision and subsequent outcome was not contemplated by the parliament that passed the legislation and/or enforcement or safeguards of the legislation are shown to be inadequate and/or inconsistent	[REDACTED]	[REDACTED]

It is anticipated that the investigation findings will be made by:

- ☒ **A delegate**, where the power is delegated in the *Instrument of Delegation*; or
- ☐ **The Authority**; or
- ☐ **Not applicable** (for matters that will not be investigated).

DECISION WHETHER TO INVESTIGATE MATTER

I, [REDACTED], being at the appropriate level in the *Instrument of Delegation*, and noting the public interest considerations in the *IGA Investigation Manual and Toolkit*, including the matters listed above in the staff recommendation, decide that the matters:

☒ will be investigated under section 21 of the *Interactive Gambling Act 2001*; or

☐ will not be investigated.

[REDACTED]

Date: 15/9/2023

[REDACTED]
Manager, Gambling Compliance Team

Attachment A

Service	URL	Traffic Mar-Aug 23	Spike in July/Aug 23	Source	Status
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Golden Bet	https://www.goldenbet.com (Santeda Internaional Limited)	8637	Yes (marginal)	News	Consider investigating