Australian Government | acma Australian Communications and Media Authority

Guidance on financial transaction blocking of designated interactive gambling services

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Introduction

The Australian Government has introduced new measures to disrupt access to illegal online gambling services and reduce gambling-related harm.

On 26 August 2026, the Parliament of Australia enacted the *Interactive Gambling Amendment (Gambling Reform) Act 2026* (Gambling Reform Act), which introduces a new Part 2C into the *Interactive Gambling Act 2001* (IGA) that will commence on 1 January 2027.

Part 2C establishes a framework requiring authorised deposit-taking institutions and participants in payment systems to take reasonably practicable steps to prevent transfers of funds related to designated interactive gambling services.

This initial guidance has been developed to assist entities captured by section 15J to prepare for the commencement of the financial transaction blocking requirements. Formal guidance about the operation of Part 2C may be made under section 15K of the Interactive Gambling Act at a later stage.

The Australian Communications and Media Authority (ACMA) recognises that payment systems involve a broad range of participants with differing roles, responsibilities, technical capabilities and access to information. As a result, entities may need to adopt different approaches to identifying and disrupting transfers of funds related to designated interactive gambling services. This guidance is intended to support a principles-based and multifaceted approach to compliance and should be read alongside the IGA and the Gambling Reform Act and its revised Explanatory Memorandum.

This guidance is for general information only. It is not intended to provide legal advice and it does not take account of individual circumstances. It is based on the law and policy as existing at the time it was published. Changes to law or policy may cause it to fall out of date, or it may otherwise be inapplicable to your circumstances. You should always consider obtaining legal advice based on the particular facts of your case.

Background

Financial transaction blocking requirements

Section 15J of the IGA requires authorised deposit-taking institutions and participants in payment systems to take steps to prevent a payment being made, or funds being transferred to designated interactive gambling services, in circumstances covered by subsection 15J(2), so far as it is reasonably practicable to do so.

The term ‘funds’ is intended to have a broad meaning and includes money and digital units of value, including digital currency. The requirements capture relevant transfers to designated interactive gambling services in Australia and overseas. They are not directed at transfers from those services to Australian customers, such as the payment of winnings.

What is a designated interactive gambling service?

Under the IGA, a designated interactive gambling service is either:

- a prohibited interactive gambling service, such as an online casino-style game or online slot machine service
- an unlicensed regulated interactive gambling service, such as an online wagering or lottery service provided to customers in Australia without a licence issued under the law of an Australian state or territory.

A service may be a designated interactive gambling service whether it is based in Australia or overseas. Some providers may operate lawfully in other jurisdictions but be prohibited or unlicensed for the purposes of providing services to customers in Australia.

Who is captured by section 15J?

Subsection 15J(1) applies to:

- an authorised deposit-taking institution within the meaning of the *Banking Act 1959*
- a participant in a payment system within the meaning of the *Payment Systems (Regulation) Act 1998*.

The provisions are intended to apply broadly to entities that facilitate or participate in payment systems through which funds may be transferred to designated interactive gambling services.

Depending on the particular arrangements, captured entities may include:

- banks, credit unions and other authorised deposit-taking institutions
- digital wallet providers and payment service providers
- credit and debit-card scheme providers
- payment gateways, acquirers, processors and other payment intermediaries
- alternative currency providers, including cryptocurrency service providers.

These examples are not exhaustive. Whether an entity is captured depends on the statutory definitions and its particular role and activities. An entity should obtain legal advice if it is uncertain whether section 15J applies to it.

Obligations for industry

Entities captured by section 15J are expected to take a proactive, risk-based approach to compliance. Each entity should develop and maintain policies, procedures, systems and controls tailored to its role, responsibilities, operations and access to information within the payment ecosystem.

An entity should begin by assessing the risk that its products, services or systems may be used to transfer funds to designated interactive gambling services. The assessment should inform the design and implementation of appropriate controls and should be documented and approved through suitable governance arrangements.

The requirement is intended to disrupt the flow of funds to designated interactive gambling services. Entities should not rely only on information supplied by the ACMA or wait until a particular service or transaction is brought to their attention. They should actively consider the risks arising from their role in the payment system and establish measures capable of identifying and preventing relevant payments and transfers.

Effective compliance requires ongoing attention and review. Designated interactive gambling services may change their business models, payment pathways, merchant identifiers, account details and other behaviours to avoid detection. Entities should actively monitor the operating environment and emerging risks, and regularly review, test and update their arrangements to ensure they remain effective.

As appropriate to its circumstances, an entity should:

- conduct and document an initial risk assessment, including the nature and likelihood of relevant transactions and the entity's visibility of and control over those transactions
- develop and implement policies, procedures and controls that respond to the identified risks and are tailored to the entity's role in the payment system
- assign clear accountability for compliance, supported by appropriate oversight, escalation and reporting arrangements
- provide relevant staff, agents and contractors with training and guidance appropriate to their functions
- regularly test, monitor and review the operation and effectiveness of its systems and controls, including through quality assurance, audits or other assurance activities
- respond promptly to new intelligence, identified control weaknesses, complaints, circumvention methods and changes in the environment
- maintain records sufficient to demonstrate the assessments undertaken, measures implemented, decisions made and actions taken.

Where an entity relies on a third party to provide systems or services relevant to compliance, it should consider whether contractual arrangements, assurance activities and oversight are sufficient to confirm that the third-party solution enables the entity to meet its own obligations. Reliance on another participant or service provider does not, of itself, discharge an entity's obligations under section 15J.

How the ACMA may assess compliance with section 15J

Reasonably practicable steps

In assessing whether an entity has taken reasonably practicable steps to comply with section 15J, the ACMA may consider the entity's role in the payment system and the information, systems and capabilities reasonably available to it.

The measures outlined below identify a range of approaches that entities may consider in taking reasonably practicable steps to comply with their obligations. These approaches are intended as guidance only, and entities should determine which measures are appropriate having regard to their particular circumstances.

Risk assessment and compliance framework

The ACMA may consider whether the entity has identified and assessed the risks relevant to its products, services, customers, payment channels and role in the payment ecosystem, and whether that assessment is current, documented and reflected in its controls. This may include whether the entity has:

- considered the ways designated interactive gambling services may use or attempt to circumvent its systems
- identified relevant data sources, indicators, payment methods and transaction pathways
- translated the assessment into tailored policies, procedures, system requirements and operational controls
- established clear governance, accountability, escalation and reporting arrangements.

ACMA information

The ACMA publishes information that may assist entities to identify transactions related to designated interactive gambling services, including a list of blocked gambling websites, information about blocked service providers, and a register of wagering service providers licensed by Australian state and territory licensing bodies.

However, ACMA information is only one means of identifying transactions related to designated interactive gambling services, and reliance on ACMA information alone is unlikely to be sufficient to identify all relevant transactions and instigate transaction blocking. Entities are expected to develop and maintain policies, procedures and systems appropriate to their role in the payment system to identify and block relevant transactions.

Measures entities may consider

In addition to having regard to information published or otherwise made available by the ACMA, entities may consider measures such as:

- using merchant category codes to assist in identifying transactions related to designated interactive gambling services
- using merchant-specific information, account details, payment identifiers and other available transaction data to identify transactions related to designated interactive gambling services

- maintaining or using a blacklist of known designated interactive gambling services and associated identifiers to assist in identifying and disrupting relevant transactions
- maintaining or using a whitelist of legal operators to assist in distinguishing legitimate gambling-related transactions from transactions related to designated interactive gambling services
- implementing rules-based controls, transaction monitoring and detection processes designed to identify and disrupt relevant transfers
- establishing or participating in timely information sharing arrangements with relevant industry participants and government stakeholders
- establishing documented policies, procedures, governance and complaints handling arrangements to support compliance
- providing training and regular communications to relevant staff, agents and contractors
- testing and monitoring the effectiveness of controls, including through quality assurance, scenario testing, audits and independent reviews where appropriate
- maintaining records that demonstrate the steps taken to identify and block transfers of funds related to designated interactive gambling services.

These examples are not exhaustive. The appropriateness and effectiveness of a measure will depend on the entity's circumstances. A measure that was appropriate when introduced may cease to be sufficient as payment technologies, industry practices, designated services or methods of circumvention evolve.

Ongoing review, testing and improvement

The ACMA may consider whether an entity makes a sustained and meaningful effort over time to maintain effective compliance arrangements. This may include the adequacy and frequency of testing, monitoring, assurance, audits and reviews, and whether identified weaknesses are addressed promptly.

Entities should keep their risk assessments, policies, procedures and controls under active consideration. Reviews may be prompted by changes to products or systems, new payment methods, intelligence received from the ACMA or other sources, complaints, control failures, changes in transaction patterns, or evidence that designated interactive gambling services have changed their behaviour.

Proportionality and entity-specific considerations

In assessing whether an entity has taken reasonably practicable steps, the ACMA may consider all relevant circumstances, including:

- the entity's role in the payment system and its visibility of and control over transactions
- the size and resources of the entity
- the nature, scale and complexity of the entity's operations
- the nature and level of the risks identified by the entity
- the technical capability and cost of implementing measures, considered against the likelihood and consequences of relevant transactions
- the information and intelligence reasonably available to the entity, including ACMA-provided intelligence and public registers

- whether the entity has taken action in relation to services that could reasonably be identified as designated interactive gambling services
- the design, implementation and effectiveness of transaction monitoring and detection controls
- the adequacy of the entity's risk assessment, policies, procedures, training, testing, assurance, oversight and governance
- the entity's participation in relevant cross-sector information sharing arrangements
- the timeliness and effectiveness of its response to relevant intelligence, emerging threats, identified control weaknesses and potential non-compliance
- the records and evidence available to demonstrate the steps taken and the basis for the entity's approach.

While the degree of visibility and control available to entities may vary across the payment ecosystem, all entities captured by section 15J are expected to consider the steps reasonably available to them. The fact that another participant may have greater visibility of, or control over, a transaction does not, of itself, negate an entity's obligation to take reasonably practicable steps. This may include working with other participants to share information, develop controls and support the identification and disruption of relevant transactions.

The ACMA may update this guidance to reflect developments in payment systems, industry practices, emerging risks and regulatory requirements.