



Gambling Right!

Responsible Gambling Policy



 **BETTUBE™**

BetTube Corporation Ltd

ACN: 635 285 326

Gambling Right! The BetTube Group Responsible Gambling Policy

2020 ver1.0

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Gambling Right!

Bet Right's Responsible Gambling Policy

Commitment

We, at Bet Right, believe that sports betting is enjoyable sports entertainment and the key to enjoyment is Gambling Responsibly, Gambling Right! Gambling Safe! and Gambling Fun!.

Whilst for most people, placing a wager or bet, having a flutter or taking a punt does not cause issues or problems for themselves or others, unfortunately, some can experience a loss of control with their gambling which may result in issues and difficulties for themselves, their families, their employer and the community in general.

Bet Right has developed Gambling Right! our responsible gambling policy, to reduce, for individuals and the community, the harms associated with the loss of control of gambling through the creation of an online responsible gambling environment in line with national and international best practices and community expectations.

Bet Right's provision of wagering and betting products and services is governed by this policy, the Northern Territory Code of Practice for Responsible Service of Online Gambling 2019 and the South Australian Gambling Codes of Practice Notice.

Responsible Gambling

Gambling responsibly is where a person is able to make informed decisions about how they gamble. This works best in a regulated environment where the potential for gambling related harms is reduced.

Gambling harm and gambling-related harm are an interrelated complex and multifaceted issue, with recent research characterising harm as "adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society". Recent research highlights that gambling harms comprise negative impacts on financial wellbeing, mental and physical health, and on relationships, particularly immediate family and friends. The experiences and behaviours of people with problem gambling are estimated to negatively impact six other people on average by, for example, elevating conflict and impairing mental health, or by causing financial detriment within the family.

Harm reduction, whether of gambling harm or gambling-related harm, is optimally achieved through the individual person's actions and ownership of their behaviour and conduct, assisted by communities, and facilitated by the regulator and the gambling industry in achieving socially acceptable gambling outcomes.

For an ordinary bettor, gambling responsibly means:

- they may gamble for pleasure and entertainment but are aware of the likelihood of losing, and understand the associated risks;
- they exercise control over their gambling behaviour; and
- gambling occurs in balance with other activities in their lives and is not causing problems or harms for themselves or others.

The wider community, including online gambling operators, have a role in responsible gambling through:

- shared responsibility for generating awareness of the risks associated with gambling;
- creating and promoting environments that prevent or reduce gambling harms; and
- being responsive to community concerns around gambling.

For some individuals, gambling responsibly becomes problematic and poses an issue and presents difficulties for their immediate family, friends, employer and the wider community arising from

- excessive financial losses; and
- adverse physical and mental health issues including stress, anxiety, depression and possible suicidal tendencies.

These consequences of problem gambling may have negative impacts on families, employers and the wider community including:

- neglect of family obligations;
- domestic and family violence;
- neglect of children and care of other vulnerable family members;
- pawning and selling off family items;
- marriage and family breakdown;
- absenteeism and poor performance at work; and

- theft and fraud at workplace.

Gambling Safe!

Bet Right subscribes to the latest peer-reviewed evidence-based or best practice-based research in Australia and overseas. From one such source, Bet Right adopted the following 9 safe gambling practices proven to be the most efficacious in harm reduction and will make it available to Clients on its website and mobile Apps.

Safe Gambling Best Practices:¹

- If you're not having fun gambling, stop.
- Keep a household budget.
- If you gamble, have a dedicated budget for your gambling.
- Engage in other leisure activities, hobbies, social activities or sports.
- Do not gamble if you're feeling depressed or upset.
- When you gamble, always set aside a fixed amount you can spend.
- Do not use credit, or cash advances on your credit card, to gamble.
- Do not use gambling to make money or supplement your income.
- Do not think that systems or strategies will ensure your success at gambling.

Harm Reduction means any policy or program designed to reduce gambling-related harm without requiring the cessation of gambling activity. Interventions may be targeted at the individual, the family, community, or society.

Best practices in public health are those sets of processes and activities that are consistent with public health values, goals and ethics, theories and beliefs, evidence, and understanding of the environment, and that are most likely to achieve public health goals in a given situation.

Bet Right Gambling Safe! Initiatives

Gambling Responsibly Information

We publish and provide on the Bet Right website and mobile Apps, and on request, relevant information following the National Consumer Protection Framework on responsible gambling including:

- Gamble Responsibly message, both long and short forms;
- information on where help with gambling harms is available;
- Terms and Agreements including betting account, placing, acceptance, confirmation and settling of bets, maximum payouts; and
- self-exclusion.

Client relations

We value our clients and place utmost importance on your well-being whilst preserving the confidentiality of your engagement with us, our products and services. Bet Right has appropriate trained staff available to respond to queries, and provide appropriate information and assistance including information on appropriate support services, under the supervision of the Head of Client Services. Other senior members of Bet Right management are also available to provide assistance and answer queries.

Bet Right has a Client Incident and Dispute, Resolution and Escalation of Resolution Procedure which maps the mechanism and processes to be undertaken in relation to gambling incidents or client dispute including procedures to escalate to manager or senior management level.

Bet Right has a Gambling Incident register which records all actions taken by staff in relation to matters falling within this Gambling Right! Policy.

Bet Right also has a separate Self-Exclusion Register which complies with the National Consumer Protection Framework requirements as well as the South Australian Gambling Codes of Practice Notice and the Northern Territory Code of Practice for Responsible Service of Online Gambling 2019.

Training

Training on all matters within the Gambling Right! Policy is provided to new staff and yearly refresher training is provided to all staff on Gambling Right! Policy and Bet Right reduction of harm initiatives as well as latest research in responsible gambling.

Bet Right's wagering platform is designed to highlight the danger gambling signals, so-called Red Flag behaviours. Staff are trained to understand these behaviours and respond appropriately in accordance with the Gambling Right! Policy.

Self-Exclusion

The National Consumer Protection Framework has mandated a National Self-Exclusion Register under the aegis of the Australian Communications and Media Authority. Whilst the National Self-Exclusion Register is being implemented, Bet Right will proceed with a self-exclusion service which will be easily accessible from its website and mobile Apps.

Provisions are also made within Bet Right's The Rule Book and Terms and Agreements covering self-exclusion. Procedures are in place to ensure that no promotional material or marketing correspondence is sent to persons on the self-exclusion register.

Bet Right will make available to everyone who visits its website and mobile Apps the relevant form for self-exclusion and will process as a priority any official self-exclusion request.

Reduction of Harm

Bet Right has put in place several measures designed to reduce harms. Bet Right subscribes to the latest research arising from the application of behavioural insights to online wagering to increase uptake.

1. Clients on signing-up to a Betting Account will be required to undergo an age verification and AML/CTF identity verification processes.
 2. Bet Right employs filter software to block underage betting. Bet Right also provides information and links to 3P filtering software which the Clients can install on their devices to prevent underage access.
 3. Bet Right employs software to prevent persons on its self-exclusion register and persons otherwise excluded from accessing Bet Right website and mobile Apps to place bets.
 4. At the time of sign-up, at periodic intervals or when a pre-determined suspicious transaction or behaviour red flag is triggered, Bet Right will monitor the relevant betting accounts.
 5. Bet Right subscribes to the voluntary pre-commitment deposit limits as mandated by the National Consumer Protection Framework and additionally by providing the Client the following choices:
 - maximum spend; and
 - time limit.
1. Bet Right subscribes to the ban on inducements as mandated by the National Consumer Protection Framework. However, Bet Right believes in providing its Clients with the best possible betting products and services.
 2. Bet Right provides activity statements as mandated by the National Consumer Protection Framework. Bet Right believes that Activity Statements can be further modified and improved to provide behavioural nudges to reduce harms. The Behavioural Economics Team (BETA) of the Australian Government has published its research on *Better Choices - Enhancing informed decision-making for online wagering consumers* Dec 2020 with recommendation of a preferred Activity Statement and Transactions List. Bet Right intends to implement the recommendation in designing its Activity Statement and Transactions List.
 3. In line with research Bet Right believes in the use of self-assessment tools to provide behavioural nudges to reduce harms. Following the safe betting practice (see above), Bet Right will provide tools or links to tools available online including the following:
 - The mini-PGSI derived from the Problem Gambling Severity Index (PGSI) as a quick self-assessment tool;
 - the PGSI self-assessment — Gambling Help Online provides such a quiz [here](#); Victorian Responsible Gambling Foundation provides such a quiz [here](#);
 - a gambling budget calculator — Gambling Help Online provides such a calculator [here](#);
 - a household budget calculator;
 - a screen time monitoring and report widget; and
 - self-help modules — Gambling Help Online provides such a quiz [here](#).
1. Bet Right recommends website filter/blocking software programs/apps to prevent underage betting. Although Bet Right does not endorse any software programs/apps nor accept any liability for any third party software programs/apps, these software programs /apps are available for consideration:
 - <http://www.gamblock.com>
 - <https://www.betfilter.com>

Bet Right Gambling Right! Initiatives

Bet Right believes in total transparency in its betting products and services and providing the best products and services to the Clients. Bet Right has the following initiatives to ensure Clients Gamble Right:

- Bet Right offers competitive odds on all products.
- Bet Right provides tutorials, online assistance with information on odds and likelihood of wins for betting products.
- Bet Right will actively promote a Client-based and run Forum where self and mutual help will be available within the Forum community.

Bet Right Gambling Fun! Initiatives

Bet Right believes that the move to online gambling has reduced the sociality of gambling that previously existed when placing bets in pubs and on the racecourse or sporting events. Bet Right intends to bring back the social aspect of wagering. At the same time, Bet Right believes that the social aspect has a role to play in reducing harms.

¹ Hing N, Browne M, Russell AMT, Rockloff M, Rawat V, Nicoll F, et al. (2019) Avoiding gambling harm: An evidence-based set of safe gambling practices for consumers. PLoS ONE 14 (10): e0224083. <https://doi.org/10.1371/journal.pone.0224083>