



Senate Environment and Communications Legislation Committee

**Interactive Gambling Amendment
(Prohibition on Credit Card Use) Bill 2020**

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TABLE OF CONTENTS

1	CONTEXT	1
2	CREDIT SHOULD NOT BE USED FOR GAMBLING	2
3	CREDIT CARDS EXACERBATE GAMBLING-RELATED HARM	3
3.1	CREDIT CARDS ARE EASY TO OBTAIN AND TO USE FOR GAMBLING	3
3.2	CREDIT CARD DEBT IS COSTLY AND TAKES A LONG TIME TO REPAY	4
3.3	CREDIT CARD PAYMENT ARRANGEMENTS TRAP GAMBLERS	4
3.4	CREDIT CARDS ARE PARTICULARLY DANGEROUS IN ONLINE SPORTS BETTING	5
4	PAY PAL AND E-WALLETS	5
5	FUTURE PROOF THIS LEGISLATION	7
5.1	THERE ARE EMERGING LOOPHOLES	7
5.2	BANNING VOUCHERS AS A PAYMENT METHOD	7
5.3	LOANS MUST BE ASSESSED USING RESPONSIBLE LENDING PRINCIPLES	8
5.4	DISCRETION TO CAPTURE NEW ALTERNATIVES TO CREDIT CARDS	8
5.5	NEW FORMS OF GAMBLING SHOULD BE INCLUDED	8
6	CONCLUDING REMARKS	8
	APPENDIX 1 – CASE STUDIES	10
	ANDY’S STORY	10
	JENNY & JEN’S STORY	10
	RYAN’S STORY	11
	JANE’S STORY: CREDIT CARD CASH ADVANCES USED TO HIDE GAMBLING AND FAILED ATTEMPTS TO STOP THE HARM	12
	JAMES AND MICHAEL’S STORY: THEY ALWAYS BELIEVED THEY WOULD WIN	12
	JAKE: GAMBLING FRAUD ON CORPORATE CREDIT CARDS	13
	APPENDIX 2 – ABOUT OUR ORGANISATIONS	14

About this submission

This is a joint submission from Financial Counselling Australia (FCA), Consumer Action Law Centre and Financial Rights Legal Centre in response to the Senate Inquiry into the Interactive Gambling Amendment (Prohibition on Credit Card Use) Bill 2020.

While gambling is a legitimate form of entertainment for many Australians, gambling should not be funded by credit. We therefore support a prohibition on the use of credit cards, including via e- wallets, for digital gambling.

1 Context

Online gambling has changed the way Australians gamble and COVID has accelerated these changes. During the 2020 lockdowns, unlike in the UK, Spain, Sweden and other European countries, Australia's governments and gambling regulators took no special actions to curb gambling expenditure. When physical venues closed, gambling moved online. A joint study by credit bureau Illion and analytics firm AlphaBeta reported a 67 percent rise in online gambling during the first week of April 2020.¹ A few weeks later, NAB's transactional analysis showed gambling spend up 62.7% from the same four-week May period the previous year. This was up 50.7% from January.²

In August 2020, Flutter Entertainment announced that Sportsbet's operating profit was up 108%, over the previous year for the six months to June 30.³

Entain, the conglomerate with a market capitalisation of £9.71 billion, that owns Australian brands Ladbrokes and Neds, reported strong Australian online revenue growth of 55% in 2020⁴ (compared to only 3% in Germany, 27% in the UK).

In financial counselling casework, we are now seeing the other side of these record industry gains. We're seeing mostly men losing huge sums of money gambling online. The speed of losses with online gambling is different to the pokies. The online cohort are losing so much more in a very short period of time. Some tell us that it doesn't seem like real money until it has all gone. When their own wages or savings are gone, they turn to credit and this is where the harm is compounded. Clients commonly present having multiple credit cards, with some having as many as ten or even fifteen. Others have been able to easily increase their credit limits, despite it being evident that they are borrowing for debt financed gambling. They are paying interest rates up to about 27% on these cards.

Some have used a card belonging to a family member or their workplace, abetted by some wagering companies turning a blind eye and not caring that the name on the card does not match their customer's account name. For some people, gambling is deliberate and calculated form of family violence. For others, it is part and parcel of a terrible struggle with their addiction. A substantial number of people with issues associated with gambling receive sentences for fraud.

Sadly, one man told FCA "I was glad that I went to prison. I couldn't stop. I didn't know how to stop." His Australian licensed gambling company reported him to police for paying with a cheque that it credited to his gambling account, before the money was cleared.

For some time Australians have been the world's biggest gamblers per capita, losing \$24

¹ [Global Online Gambling Market Report 2020-2025 - COVID-19 has Led to a Sudden Rise in Revenues with Some Studies Reporting 67% Increase - ResearchAndMarkets.com, October 23, 2020, Businesswire.com](#)

² NAB Economics Data Insights: Impacts of coronavirus on consumption based spending and business payment inflows, June 2020, <https://business.nab.com.au/wp-content/uploads/2020/06/nab-economics-data-insights-6-june-2020.pdf>

³ Digital betting shift delivers huge Sportsbet profit, *The Australian*, 27 August 2020, <https://www.theaustralian.com.au/business/companies/digital-betting-shift-delivers-huge-sportsbet-profit/news-story/474d70966b73fc275181c427fa1dc2b0>

⁴ Entain revenue flat in 2020 amid year of change, [igamingbusiness.com](https://igamingbusiness.com/entain-revenue-flat-in-2020-amid-year-of-change/), 4 March 2021, <https://igamingbusiness.com/entain-revenue-flat-in-2020-amid-year-of-change/>

billion a year.⁵ The most recent snapshot of gambling in Australia shows that when averaged out across the adult population, Australians bet almost \$11,000 per person. The losses, however, are overwhelmingly incurred by a smaller subset of people. These 'losing gamblers' are invited into the VIP marketing program, where they are groomed to keep losing. The majority of profits come from this small group of troubled gamblers.

We are extremely concerned about the rise in gambling, particularly when Australians are dealing with the impact of the pandemic. However, we are even more concerned about debt financed gambling, including via ubiquitous credit cards.

While a person affected by gambling may lose all of their money, the harm is compounded considerably when they now owe debt(s).

There is a community expectation that there are consumer protections in place to protect customers from financial harm. Our current responsible lending laws offer some protection to people who use credit to gamble, and provide redress where lenders offer credit that is clearly unaffordable or unsuitable. It is critical that our responsible lending protections are maintained. In addition, a prohibition on using a credit card for online gambling would be an effective and practical way to further limit the harm.

2 Credit should not be used for gambling

We strongly support the policy rationale and intent behind this Bill.

While gambling is a legitimate form of entertainment for many Australians, gambling should not be funded by credit.

We urge the Government to ban the use of credit cards for gambling, which would be in line with its position on problem gambling that was taken to the 2013 election:

“Responsible gambling is all about people gambling within their means. Extending lines of credit to gamblers runs contrary to this principle and the Coalition will legislate to prohibit the practice.”⁶

Gambling is not an acceptable purpose for credit. Theoretically, a person requesting a loan for the purpose of gambling would not be given that loan. It is incongruous, therefore, that there is a loophole that allows credit cards to be used for gambling.

As summarised in the Explanatory Memorandum, removing credit cards from an environment where there are incentives for betting will help to reduce gambling-related harm.

Lending for gambling represents a poor risk for a lender, the customer and society as a whole because:

⁵ <https://www.abc.net.au/news/2018-10-20/australia-grows-destructive-love-affair-with-sports-gambling/10396984>

⁶ The Coalition's Policy to Help Problem Gamblers, August 2013, page 2; <http://lpaweb-static.s3.amazonaws.com/The%20Coalition%E2%80%99s%20Policy%20to%20Help%20Problem%20Gamblers.pdf>

- The customer is very likely to lose the money;
- The customer may have an addiction or problems with managing their gambling;
- The customer may already be in financial difficulty and is trying to hide it (hoping to win to fix the problem);
- Default rates will inevitably be higher for those customers who gamble with credit (and even greater for those gambling with a combination of credit and their own funds) and,
- Gambling is a highly risky activity that is unlikely to increase a person's wellbeing overall.

Appendix 1 has a number of case studies illustrating the problems associated with credit cards and gambling.

3 Credit cards exacerbate gambling-related harm

There is a community recognition that people need practical protections from a gambling addiction. People experiencing gambling-related harm will actively seek to continue gambling—gambling is a pernicious addiction.

We submit that the community would expect that credit cards be prohibited for use from online gambling.

3.1 Credit cards are easy to obtain and to use for gambling

Credit cards are relatively easy to obtain. After obtaining a credit card, getting a limit increase can also be relatively easy, especially as limit increases can be applied for online with most banks. Despite the Financial Services Royal Commission and our existing responsible lending protections, and some improvement in lending practices, financial counsellors are still reporting credit card debts related to gambling (and personal loans).

Financial counsellors also commonly report that people with gambling issues have multiple credit cards. Some of these cards might have been issued many years ago, yet the accounts remain open and limits available to draw down on.

When gambling operators see people adding multiple cards to their accounts, it is a sign that the customer has gambling issues. When a financial counsellor or consumer lawyer looks at a client's gambling activity transaction reports, many are littered with repeated 'declined transactions', which is a clear sign that the person is in trouble. It should be easy to spot these people.

However, the industry has not limited the number of credit cards that a person can attach to their account. We see little evidence that operators are proactively acting on signs of harm. If five different cards are declined, the chances are that the sixth card attached to the account will be 'accepted with thanks'.

People with gambling addictions say that they actively seek credit from wherever they can get it. One man who contacted a financial counsellor had 15 credit cards, all used for gambling. It is the nature of the addiction that when the gambling urge is triggered, the

person is driven to do anything necessary to keep on gambling. Disordered or delusional thinking is often part of the addiction. No gambler seeking help is proud of where they have ended up, and what they have done along the way.

3.2 Credit card debt is costly and takes a long time to repay

Minimum monthly payments on credit cards can mean that a debt can be very costly and take many years to repay. A debt-fuelled gambling binge therefore can result in years of financial detriment. For example, spending \$10,000 in a night of gambling could take 43 years and 11 months to repay and cost \$36,332⁴ if only making the minimum monthly repayments.

We have previously advocated for reform to increase minimum repayments on credit cards.⁷

People affected with gambling problems often make sure they make the minimum repayments on a credit card to ensure they maintain access to the credit card.

To an addicted person, there is an imperative to keep their means of gambling open at all costs.

A credit card is a line of credit and it is available to use when needed. The reliance on credit cards for gambling can mean that the credit card is paid before basic living expenses. In effect, the person prioritises access to gambling over basic living for themselves and their family. This can cause long-term detriment for both the person and their family.

3.3 Credit card payment arrangements trap gamblers

Although credit card providers now have to assess whether a potential borrower can repay the whole of their card limits over three years, the minimum monthly repayments can be as low as 2% - 3%. We note that:

- most people who present to financial counsellors with gambling issues will have multiple credit cards; and
- gamblers will look to find ways to make the minimum monthly payments, even if it means not paying other household bills, so that they have access to at least some credit for gambling. This means that financial hardship can be pushed onto other areas of a household budget, with other industries, such as utilities or telecommunications, picking up some of the 'hardship assistance'.

⁷ For example, see Consumer Action Law Centre submission in response to the exposure draft Treasury Laws Amendment (2017 Measures No.8) Bill 2017 dated 23 August 2017 available at <https://consumeraction.org.au/wp-content/uploads/2017/08/170823-FINAL-submission-Exposure-Draft-Bill.pdf>.

3.4 Credit cards are particularly dangerous in online sports betting

Credit cards are commonly used in online sports betting, and a person can typically attach multiple cards to an account. This means that in the heat of the moment, there is no friction and money can be transferred instantaneously, literally with a single click.

We hear from younger male clients that initially, the context for sports betting is social. They might be at the pub or someone's house watching a game, drinking alcohol and placing bets. However, when an addiction develops, gambling can take place at all times of the day and night and become a solitary pursuit. Many men have told us that they go online at night, while drinking. Social isolation and poor mental health are apparent. While online, they see advertising through Google, Facebook and other social media. The heavier 'losing gamblers' are also targeted by VIP case managers offering incentives to keep gambling.

In August 2015, FCA launched its report '[Duds, Mugs and the A-List](#)'. This report highlighted how online sports betting companies are operating to lure Australian gamblers to gamble more than they can afford to lose. It catalogues what irresponsible gambling in Australia looks like from a consumer debt perspective. The harm is immense. *All* the case studies financial counsellors included in the report were linked to licensed Australian operators, not the 'illegal offshore operators' that the Australian industry likes to point the finger at.

The report predicted that online sports betting would grow exponentially. At that time the most harmful practice was the practice of gambling operators directly providing credit to gamblers, and then pursuing the debts through the courts including forced bankruptcy. Thankfully, in March 2018 the Federal Government legislated to prohibit gambling companies offering credit for gambling.

The report noted at the time that credit card lending was just as problematic, and it has continued to be a driver of harm. In fact, any form of debt financed gambling is likely to end badly.

4 Pay Pal and e-Wallets

We commend this Bill for tackling the use of e-Wallets, such as PayPal. There are a number of issues with PayPal, the largest e-wallet.

1. PayPal's 'instant transfer' method of payment involves the funds going to the gambling operator in real time, but the amount is transferred from the person's credit card or bank account to PayPal with a clearance time of up to two days. On the bank statement, the money is taken out of the account on the day the spend occurs, but the clearance system has a lag. If there are no funds in the account, instead of the transaction being rejected, the gambling operator gets the money immediately, then the person incurs a debt to PayPal.

Case study

Randall is on a disability pension after being seriously injured in a workplace

accident where he lost a limb, and then lost his job. His PayPal statements show that he incurred a \$600,000 debt to PayPal, for gambling with a single online operator over one weekend last year. It all went to one of the large Australian licensed gambling operators. PayPal is pursuing the debt through its debt collectors. The wagering operator did not contact Randall despite \$600,000+ of gambling losses in 48 hours and no visibility over the source of funds, as required under AML laws.

This default provision of credit needs to be stopped. It appears to fall between the regulatory cracks, as there is no interest charge on the transactions (although interest is charged on the subsequent debt). PayPal is not a licensed credit provider in Australia.

The bank clearance needs to be changed to real time, so unfunded transactions are declined.

2. E-Wallets allow the identity of the account holder financing the gambling to be hidden.

E-wallets allow the credit cards of third parties to be used fraudulently. Sometimes this involves elder abuse or family violence, for example a man using his wife's card repeatedly, leaving her to pick up the debt (or vice versa). There are other examples where fraud is involved.

Case study

Jake was a newly graduated young accountant working for a large financial services company. He was in charge of giving out the new corporate credit cards to his colleagues. He wrote down the card numbers. Over two months he gambled over \$200,000 with an online sports betting company using his colleagues' cards. The Paypal transaction report detailed the various names. Finally, someone at his workplace suspected something. He quickly confessed everything and expressed relief at being stopped. He was sentenced to jail, and was ordered to repay the money to the court. He is now out of jail but cannot work as an accountant. As far as we know, the online sports betting company retained the funds. The sport betting company could have argued that it did not see all the cards being used, but no one has held it to account for its lack of action when a 24 year old deposits \$160,000 in a single month.

3. There has been an explosion of e-wallets in Australia and abroad with the advent of open banking and the emergence of fintechs. E-wallets can have a number of funding sources added to the facility, including credit cards.

We commend the Bill for including e-wallets, as this is needed if there is to be an effective ban, otherwise gambling will still be funded via credit cards, attached to e-wallets. In the UK, gambling operators have had licence conditions imposed by the gambling regulator to ensure that they only accept payments via e-wallets where the wallet provider can assure the operator that they can prevent payment for gambling

by credit cards (see UK Gambling Commission, Consultation response Jan. 2020 3.61). This is in response to the UK Parliament leading the way on safer gambling.

5 Future proof this legislation

5.1 There are emerging loopholes

Since the UK ban on credit card gambling, the emerging loophole is vouchers. And there will be other workarounds. We need to anticipate industry creativity, and the Government needs to provide regulators with the flexibility to adapt.

Only payment methods that allow people to use their own money should be accepted for gambling.










To future proof the intention and outcomes of this Bill, we recommend strengthening the Bill in a number of areas to provide the regulatory scope to mitigate harm as the gambling industry and new forms of payments evolve.

5.2 Banning vouchers as a payment method

After a ban on the use of credit cards in the UK, vouchers have become an increasingly popular round-about avenue for funding gambling with credit cards. As pictured, the gambling operator Bet365 in the UK provides multiple options for alternative payment methods, which can be funded using credit cards.

Deposits Withdrawals

Country: UK Currency: GBP

Payment Method	Fee	Process Time	Min	Max	Details
	Free	Instant	£5.00	£20,000.00	Debit Card ▾
	Free	Instant	£5.00	£20,000.00	Credit Card ▾
	Free	Instant	£5.00	£5,000.00	Debit Card ▾
	Free	Instant	£10.00	£5,500.00	eWallet ▾
	Free	Instant	£5.00	£5,000.00	Debit Card ▾
	Free	Instant	£5.00	£770.00	Prepaid Voucher/eWallet ▾
	Free	Instant	£5.00	£5,000.00	Debit Card ▾
	Free	2-10 Banking Days	£100.00	£100,000.00	Bank Transfer ▾
	Free	5-28 Banking Days	£100.00	£50,000.00	Cheque ▾

5.3 Loans must be assessed using responsible lending principles

People affected by a gambling addiction do not use just credit cards, they also apply for other forms of credit like personal loans. They may lie about the purpose of the loan or may apply for the loan deceiving themselves about the purpose. Some receive unsolicited offers to apply for personal loans. Gambling is often clearly evident at the time of application, particularly when the customer also has their daily transaction account with the same bank. Having the new lump sum waiting in an account can trigger an intense gambling binge, which in turn results in the online gambling operators providing higher levels of bonus bets and VIP case management. The addiction and harm spirals.

The Government's proposed watering down of responsible lending laws (in the *National Consumer Credit Protection Amendment (Supporting Economic Recovery) Bill 2020* currently before the Senate) for most credit products would only increase the risk that people experiencing gambling addiction could obtain additional lines of credit that would be unaffordable or unsuitable. That Bill must be abandoned, otherwise the harm to people with gambling problems will only be turbocharged. Rather than watering down responsible lending laws, we recommend stronger, specific ASIC guidance around applying existing responsible lending principles to ensure credit is not provided in the event where gambling is the main driver of the consumer seeking a loan.

5.4 Discretion to capture new alternatives to credit cards

We cannot predict the online gambling future, so regulatory discretions are important, in order to future-proof the *Interactive Gambling Act 2001* (IGA). We recommend that the legislation is future proofed, providing ministerial or regulator discretion to deem new manifestations to be 'illegal online gambling' or 'legal online gambling', thereby capturing them either way.

5.5 New forms of gambling should be included

It's also important that reform of the IGA considers new forms of gambling that are emerging. Examples of emerging areas include peer-to-peer e-sports games where a player competes against another player online, even if the host website is in another country. Virtual reality online casinos are yet another form.

The gaming industry is predicting it will be highly profitable to add gambling to games and distribute these through mobile phone apps (as opposed to online web-based gambling).

We cannot predict the online gambling future, so regulatory discretions are important, in order to future-proof the IGA.

6 Concluding remarks

Working with people with addictions is difficult, as many are entrenched in an addiction mindset. We know that no single intervention will stop all harm, but stopping credit cards from being used for gambling will be a solid step forward.

If we can prevent some families from being ruined financially, prevent a few gambling-

related suicides, or even just stop some young people from incurring gambling debt at the start of their adult lives, then this will be positive.

The use of credit cards for gambling must be prohibited. A prohibition will be far more effective in reducing harm, than providing individuals with the ability to block a credit card from being used for gambling.

We commend the Parliament for undertaking this Inquiry into this Bill to assess how it can assist in minimising gambling-related harm.

Appendix 1 – Case studies

Andy's story

Andy's (name changed) only source of income has been the disability support pension for about seven years. Andy told us that he had been introduced to gambling as a teenager and had experienced issues with it for all his life.

Andy contacted the National Debt Helpline in April 2021, when he had over \$140,000 of debt, the majority of which was on credit cards. He told us that virtually all of this was incurred from gambling. Andy estimated that on one credit card with a \$20,000 limit, he would have paid back close to \$400,000 in total, having repaid the limit that many times. He said that he had put most of the proceeds from selling a café he previously owned, as well as money he inherited, into paying back gambling debts.

Andy reported that he had often considered giving up and the financial impact of his gambling made his mental health issues much worse. Andy has recently stopped gambling, and is working with a financial counsellor and a mental health counsellor. While he is still in a difficult situation, he now has hope.

Andy supports the proposal to ban the use of credit cards for online gambling. He said credit cards made online gambling with credit far too accessible. Using his credit card online had allowed him to lose thousands of dollars he didn't have many times without really comprehending it – while he was simply 'on autopilot'. While it may not have stopped him altogether, he believed that if he couldn't use credit cards to pay for his online gambling, he would be in far less debt now.

Jenny & Jen's story

Jenny and Jan are in a similar position:

They are repaying debt on credit cards and/or personal loans because of a gambling addiction.

They can't afford to make the minimum payments to cover the high interest charges.

Their families are suffering as a result, including going without essential items.

The easy access to cash advances from the credit cards made gambling easy for both of them.

Their credit limits jumped quickly.

Jenny

Jenny works full time in a job involving shift work, and earns \$900 a week. She cares for her two children. Jenny was homeless when she sought help from a financial counsellor in 2016. Jenny had a gambling problem and ended up with a \$7,500 bank credit card debt. Jenny's total debt has risen to \$30,000 despite making regularly monthly payments for three years. She has now taken out payday loans to try to stay afloat. Her children are disadvantaged

because of the lack of money in the household for anything other than the bare necessities of survival. Her 18-year-old son is now at university and gives most of his part-time job money to his mother. The whole family feels the stress, all because of the payments required on a credit card that was used for gambling.

Jan

Jan, a single mother, works full time and earns \$1,600 a week, which includes child support. She has gambling issues. She has five credit cards and two personal loans accrued over the past 12 years. Her unsecured debt is \$78,000.

She has continued to make the minimum payments on all her debts, some with hardship reduced payments. The balance overall has not changed, but she does not want to lose her ability to have these accounts as a back-up, and bankruptcy is not an option due to her employment.

Ryan's story

Ryan, a 25-year-old tradesman, had a serious gambling addiction. From 2015- 2017 he obtained 43 payday loans and three credit cards from 10 lenders to fund his gambling addiction. Ryan's salary was paid into his transaction account, which was held at the same bank that provided the credit cards. He had defaulted on his credit card repayments numerous times and had defaulted on his car loan.

Struggling, Ryan sought his mother's help. With his consent, his mother explicitly informed the bank branch manager of his gambling addiction. She asked for cash advances to be stopped, but was told the bank couldn't do this. So, she helped Ryan cancel the credit card.

Their credit limits jumped quickly.

She was shocked when Ryan received two new credit cards within two months of closing the first credit card. She returned to the branch and requested that the bank note Ryan's gambling addiction on his account and not provide more credit cards.

Post disclosure of gambling addiction

Just one month after receiving his second credit card, Ryan had spent more than the \$6,000 limit. At the date of Ryan's application for his second credit card, his credit report showed 30 consumer credit enquiries, including three other credit card applications and 23 payday loan applications in the preceding 27 months (that is nearly one credit application a month!).

After reaching the limit on the second credit card, Ryan then applied for, and was granted, a third credit card, which had a limit of \$15,000. Ryan spent that \$15,000 within two weeks.

By this time Ryan's credit report showed an additional four enquiries from payday loan providers and another two enquiries from alternative credit card providers.

Ryan eventually sought addiction counselling and gave his mother an enduring power of attorney.

After negotiations, the bank acknowledged the extensive gambling transactions on the credit card facilities, closed both credit cards, and agreed to:

- no further provision of credit
- waive 50% of the debt on credit card 2
- Waive nearly 60% of the debt on credit card 3

A repayment schedule was agreed to repay the balance interest free within 72 months.

Jane's story: Credit card cash advances used to hide gambling and failed attempts to stop the harm

Jane is in her 40s and receives the disability support pension. Her husband doesn't know about her gambling addiction. Jane frequently runs out of money because of gambling, and borrows money for food.

Jane had a bank credit card with a \$2,000 limit. A friend tried to help Jane manage her debts and paid it off, and the card was cut up. But because the account was never cancelled, Jane still had access to it through phone banking, and she soon ran up the \$2,000 debt again.

Jane would get a cash advance through her phone and then put it into a separate account. She would gamble and repeat the process until she reached the card limit. Jane would try to reduce her balance, but then she would start withdrawing again.

Following advocacy by a financial counsellor, the bank stopped all fees and charges and Jane is now on a payment plan of \$50 per fortnight.

James and Michael's story: they always believed they would win

For James and Michael, brothers in their late 20s, gambling on Saturday afternoons was just part of their socialising. Whether they physically went to the races or spent the afternoon sitting in their lounge room, gambling was just part of their lives. They always believed they would win.

They both worked hard running their own businesses and earned reasonable incomes.

On Saturdays, they would gamble about \$500 each, but on special occasions and big sporting events, this went up to \$2,000 each. The gambling went on for three years or so. They had the mistaken idea that their ad-hoc winnings would cover their credit card bets but, in reality, they fell further into debt.

James eventually owed \$165,000, which included a personal loan of \$26,000, two bank credit cards of \$28,000 and \$18,000, two other bank credit cards of \$32,000 and \$26,000 and another credit card of \$18,000.

Michael was \$116,000 in debt, including five bank credit cards of \$30,000, \$32,000, \$25,000, \$12,000 and \$10,000.

Then one of the businesses started failing and James' partner became pregnant. Both brothers started feeling huge financial pressure and sought financial counselling not about the gambling – but because they could not afford their debts.

Jake: gambling fraud on corporate credit cards

Jake was a young professional in his early 20s working for a major financial institution. He had gambled online from the age of 18. His addiction worsened, and he committed fraud to fund his gambling spree. He spent more than \$250,000 using his colleagues' corporate credit cards on a single wagering operator in less than two months. The corporate credit card-funded transactions were obscured from the wagering operator as they came via PayPal.

Jake received a prison sentence. As far as we know, the bank did not recover the funds from the online wagering operator. These crime-funded, suspicious transfers may also raise Austrac issues.

From prison, he told FCA: "I was glad that I was caught. I didn't know how to stop gambling." Such is the nature of an addiction.

Appendix 2 – About our organisations

About Financial Counselling Australia and Financial Counselling

Financial counsellors provide advice to people with money and debt issues. Working in community organisations, their services are free, confidential and independent.

Financial Counselling Australia (FCA) is the peak body for financial counsellors in Australia. FCA's members are the State and Territory financial counselling associations.

In 2015, FCA released a report titled "Duds, Mugs and the A-List: The Impact of Uncontrolled Sports Betting". The report described the issues financial counsellors were seeing as a result of predatory practices in the online sports betting industry. Later that year, the Federal Government commissioned a review into online gambling. One of the recommendations of this review was to ban gambling companies from providing credit to people to gamble. FCA has been actively involved in developing the legislative consumer protection framework applying to online gambling. Our work is informed by financial counsellors including specialist gambling financial counsellors, as well as by direct interactions with people who gamble, or their families.

Consumer Action Law Centre

Consumer Action is an independent, not-for profit consumer organisation with deep expertise in consumer and consumer credit laws, policy and direct knowledge of people's experience of modern markets.

CALC works for a just marketplace, where people have power and business plays fair. It makes life easier for people experiencing vulnerability and disadvantage in Australia, through financial counselling, legal advice, legal representation, policy work and campaigns. Based in Melbourne, CALC's direct services assist Victorians and advocacy supports a just market place for all Australians.

Financial Rights Legal Centre

The Financial Rights Legal Centre is a community legal centre that specialises in helping consumers, especially low income and otherwise marginalised or vulnerable consumers, understand and enforce their financial rights.

It provides free and independent financial counselling, legal advice and representation, and self-help resources to individuals about a broad range of financial issues including consumer credit, debt and insurance. It also advocates for law reform and improvements to industry practices to improve outcomes for consumer

