



GAMBLING HARM LIVED EXPERIENCE EXPERTS

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[Language Guide](#)

Re: Submission – Racing and Wagering Amendment Bill 2026 (NT)

Gambling Harm Lived Experience Experts (GHLEE) welcomes the opportunity to provide a submission in response to the proposed **Racing and Wagering Amendment Bill 2026**. Our response is formed from our interpretation of the above-mentioned Bill and our online attendance at a public hearing on 24 March, 2026.

GHLEE is comprised of individuals with lived experience of gambling harm. Our members have experienced firsthand the profound financial, emotional, and social consequences associated with gambling. We are committed to raising awareness of these impacts and advocating for meaningful reforms that protect vulnerable individuals and communities.

National Context and Position

Prior to addressing the current Bill, GHLEE expresses its disappointment with the Northern Territory (NT) Governments, Racing and Wagering Act 2024, which failed to adequately reflect the voices and experiences of those impacted by gambling harm. Public reporting has highlighted concerns that reforms in the Northern Territory risk leaving consumers exposed to harm.

<https://www.couriermail.com.au/news/northern-territory/advocates-warn-northern-territory-gambling-reforms-may-leave-public-at-risk/news-story/5287f1480fd7247ede8fe39884f06c75>

In terms of online gambling regulation, GHLEE places on record its unequivocal support for the establishment of a **national online gambling regulator**, consistent with Recommendation 3 of the *House of Representatives Standing Committee on Social Policy and Legal Affairs Inquiry into Online Gambling* (“*You win some, you lose more*”).

https://parlinfo.aph.gov.au/parlInfo/download/committees/reportrep/RB000159/toc_pdf/Youwinsome,youlosemore.pdf

Recommendation 3 calls for:

- the establishment of a national regulator with a sole focus on harm reduction and responsibility for all licensing and regulation; and
- a levy on online wagering service providers to fund national harm reduction measures.

GHLEE also concurs with quotes in the report that reference underwhelming regulation:

“If the status quo of online gambling regulation... was to continue Australians would continue to lose more – more money, more relationships, more love of sport for the game rather than the odds.”

“The Northern Territory... has been described as a light touch regulatory regime.”

GHLEE is deeply concerned that the Federal Government has failed to respond to the, “*You win some, you lose more*” report more than 1,000 days after its delivery, despite an expected response timeframe of approximately 180 days.

GHLEE members recently attended the first Independent Gambling Research Conference, where evidence consistently demonstrated that gambling harm is compounded by ineffective regulatory frameworks. It was notable that, while other regulators were present, representatives from the Northern Territory—responsible for regulating the majority of online wagering providers—were not.

Evidence based research continually concludes the relationship between online gambling harm and ineffective regulation of licensees.

“Online and risky gambling were strongly associated with psychological distress, highlighting the potential for growing harm if not addressed through evidence-based public health strategies, including stronger regulation of online products.”

<https://polis.cass.anu.edu.au/files/docs/2025/10/Gambling-in-Australia-2025-for-publication-v2.pdf>

In the absence of national reform, GHLEE submits that the **NT Government must take a leadership role** in strengthening consumer protections and prioritising the welfare of consumers.

Given current technological capabilities and the extensive data available to wagering operators, vulnerable individuals should be identified early and supported through meaningful interventions. Where industry has failed to do so, government must act. GHLEE therefore strongly advocates for the inclusion of **robust “duty of care” obligations** within the legislative framework.

Overview of the Bill

GHLEE acknowledges that the Bill introduces a number of structural reforms, including:

- separation of racing and wagering regulation
- expanded powers of the Director
- strengthened governance and conflict-of-interest provisions
- formalised complaints and investigation processes
- broader disciplinary powers

However, while these reforms seek to improve regulatory structure, they do not adequately address **consumer protection or gambling harm**.

Key Concerns

1. Discretion Without Obligation

The Bill confers broad discretionary powers on the Director and Commission but does not impose corresponding **mandatory obligations to act**.

This creates a framework in which:

- serious misconduct may be identified but not acted upon
 - repeat breaches may not trigger escalation
 - consumer harm may not result in regulatory intervention
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2. Complaint Time Limits – Section 221

GHLEE acknowledges the proposed extension of complaint timeframes from 14 days to 60 days. However, we vigorously and strongly oppose the retention of the **2-year limitation period giving rise to a complaint**.

This provision:

- fails to recognise the trauma, shame, and delayed reporting behaviours associated with gambling harm
- is inconsistent with best practice across jurisdictions (including Victoria, where no such limit applies)
- risks shielding licensees from accountability

No valid explanation has been provided as to how and why the two year rule exists. GHLEE can only speculate that this provision was pursued by licensees to avoid potential scrutiny and/or that the NTRWC is under-resourced and ill-equipped to deal with the number of complaints it receives. If either of these assertions is correct, then it is wholly inappropriate that consumers bear the consequence of these shortcomings, and the provision should be removed to ensure fairness, accountability, and proper regulatory oversight.

GHLEE submits that this limitation is fundamentally unjust. Gambling harm is often accompanied by isolation, stigma, and delayed recognition of harm. It can take considerable time for individuals to come to terms with their situation and pursue a complaint.

The current provision disregards this reality and risks allowing serious misconduct to go unchallenged. GHLEE therefore calls for the **abolition of the two-year limitation period in which a complaint can be lodged**.

3. Conflicts of Interest – Sections 19A–19C

GHLEE supports reforms aimed at addressing conflicts of interest in relation to the ownership of racing animals and gambling accounts held by Commission members. These and similar concerns were canvassed in the ABC Four Corners program, “*Losing Streak*”.

However, we are concerned that Section 19C (3) may still allow Commission members to receive **gifts and hospitality** under certain interpretations despite media reports suggesting this practice has ceased.

<https://www.abc.net.au/news/2025-11-06/nt-gambling-regulator-stops-accepting-hospitality-gifts/105977024>

19C (3) states that; “*An interest mentioned in subsection (1) or (2) does not include an interest that arises as a result of the supply of goods or services that are available to members of the public on the same terms and conditions*”.

GHLEE welcomes an interpretation of this section and any associated examples that might apply and how the provisions in this Section will practically be complied with.

Further, equivalent restrictions for Commission members do not appear to apply to the **Director**, despite the significant investigative and enforcement powers attached to that role.

GHLEE submits that:

- all regulatory decision-makers must be subject to **consistent and stringent conflict-of-interest provisions**; and
- appropriate oversight mechanisms must be implemented to ensure compliance.

4. Ineffective Enforcement of Licensee Misconduct

Sections 227 and 228 provide the Commission with significant disciplinary powers, including:

- suspension or cancellation of licences
- amendment of licence conditions
- disqualification of licensees

However, there is no evidence that these powers are exercised in practice, even in cases of repeated or serious breaches.

GHLEE notes that operators such as Sportsbet have been found to breach obligations by multiple regulators, including the NTRWC, ACMA, and AUSTRAC, yet have not been subject to meaningful licence-based sanctions.

This raises serious concerns regarding the **effectiveness and consistency of enforcement**.

5. Penalty Framework and Accountability

GHLEE considers the current penalty framework insufficient to deter serious misconduct.

Financial penalties:

- are ultimately **funded by customer losses**
- are often absorbed as a **cost of doing business**
- lack meaningful deterrent effect
- **do not impose personal accountability** on senior executives

GHLEE submits that stronger accountability mechanisms are required, including:

- enhanced scrutiny of executive responsibility; and
- greater utilisation of licence-based sanctions under Sections 227 and 228.

GHLEE rhetorically asks the question of what does a licensee have to do that will see the Commission or Director apply licence sanctions under Sections 227 and 228.

6. Reputational Accountability

GHLEE is concerned that enforcement outcomes often receive limited public visibility, reducing reputational consequences for non-compliant operators.

Media coverage of regulatory breaches is minimal, particularly in commercial media environments where relationships with gambling operators are well established.

GHLEE proposes that:

- licensees found to have breached their obligations should be required to publish **full-page public apologies in major national newspapers**, clearly outlining the breach and acknowledging the harm caused.

Such measures would provide meaningful **reputational accountability** and strengthen deterrence.

7. Systemic Imbalance in Accountability

There is a stark contrast between the consequences faced by individuals experiencing gambling harm and enabled by licensees verse contraventions by gambling operators.

Individuals:

- may face criminal consequences
- suffer severe financial and emotional loss
- experience long-term reputational damage

By contrast, operators:

- continue to operate with minimal disruption
- face limited reputational consequences
- are rarely subject to personal accountability
- Pay fines from customer losses

This imbalance is fundamentally unjust and must be addressed.

8. Misleading Conduct by Licensees

GHLEE is concerned that current legislation does not adequately address situations where licensees provide **false, misleading, or deceptive statements** regarding regulatory compliance.

Following the ABC *Four Corners* program ("*Losing Streak*", October 2025), Sportsbet publicly asserted that it adhered to its regulatory obligations, including AML/CTF laws. GHLEE submits that this statement is inconsistent with known regulatory findings by the NTRWC, ACMA and AUSTRAC.

It is our understanding that current legislation appears to lack clear provisions enabling regulators to investigate and act on such conduct.

GHLEE recommends that the legislation be amended to:

- empower the Director and/or Commission to investigate misleading conduct of this nature; and
 - impose significant penalties where such conduct is established.
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Conclusion

While the Bill introduces important structural reforms, it does not address the fundamental issue of **regulatory effectiveness and consumer protection**.

Without:

- mandatory enforcement mechanisms
- harm-based and duty of care triggers
- escalation frameworks for repeat offenders
- meaningful accountability

There is a real risk that serious and repeated breaches will continue without proportionate regulatory consequence.

Closing

In its current form, the regulatory framework risks prioritising administrative compliance over substantive accountability. GHLEE urges the Northern Territory Government to strengthen the Bill to ensure it delivers **effective regulation, meaningful enforcement, and genuine protection for consumers.**

Sincerely Yours
GHLEE Members

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