



National Consumer Protection Framework for Online Wagering

Consistent Gambling Messaging Frequently Asked Questions

<u>Version</u>	<u>Date</u>	<u>Changes</u>
1	18 November 2022	Original Version
2	9 December 2022	Clarification on in-app, 6-sec pre-roll, program billboards, static pop ups on TV, Push notifications, Racing Programming.
3	27 January 2023	Clarification on odds integration and market movers for free-to air and dedicated racing platforms.

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The National Consumer Protection Framework for online wagering - the Consistent Gambling Messaging Measure

What is the aim of these changes?

The consistent gambling messaging measure aims to provide nationally consistent messaging about the risks and potential harms from online wagering. The consistent gambling messaging replaces the existing tagline, 'gamble responsibly' in all instances where this is currently required or displayed. Evidence and research show the 'Gamble Responsibly' message is no longer effective in getting people to think and to minimise harm.

The Australian Government, together with state and territory governments, recognises the potential harm from online wagering. This is why the Commonwealth, state and territory governments are working together to implement the National Consumer Protection Framework for Online Wagering (National Framework).

The National Framework provides, for the first time, stronger consumer protections for Australians gambling online. The National Framework consists of 10 measures to empower individuals and minimise the harm from online wagering. The measures provide people with easy-to-use tools and information to better control their gambling.

Where can I locate further information on the National Consumer Protection Framework for Online Wagering (National Framework)?

For more information about the National Framework measures and Department of Social Services gambling reforms, please visit www.dss.gov.au/gambling.

If you have any queries, please contact the Implementation Governance Committee secretariat at gambling@dss.gov.au.

How will consistent gambling messaging help make it safer for online wagering consumers?

The consistent gambling messaging measure is based on recommendations from the Hon. Barry O'Farrell 2015 *Review of Illegal Offshore Wagering* (O'Farrell Review). The O'Farrell review recommended the development and use of nationally consistent and standardised messaging regarding the potential risks and harm from online wagering and drive safer gambling behaviours amongst Australians.

The taglines have been extensively trialled and tested to intercept and encourage positive behaviour change and direct consumers to help-seeking options. Each of the taglines works together to appeal to a wide range of audiences, including the broader community, and drive awareness of available support services, such as Gambling Help Online.

Why is 'gamble responsibly' being replaced?

Evidence demonstrates the existing tagline does not properly warn consumers and the broader community about the dangers of over-consumption, or provide meaningful information about available support services to more safely manage gambling.

The existing tagline does not provide advice about safer gambling and potentially stigmatises consumers experiencing gambling harm, implying irresponsibility for the negative consequences experienced.

A poll conducted in 2019 showed 70% of respondents did not believe the phrase 'gamble responsibly' had any effect in reducing problem gambling.¹

¹ Statista (2022). 'Opinions on the effectiveness of the phrase 'gamble responsibly' in gambling advertising to reduce problem gambling in Australia in 2019'. <https://www.statista.com>

Were stakeholders consulted on the implementation of the consistent gambling messaging measure?

The consultation process aligns with the requirements set out in the National Policy Statement, agreed by all governments in 2018. The National Policy Statement articulates that consultation is to occur in collaboration with experts, in consideration of jurisdictions and with consideration of the clarity in language for consumers of online wagering services.

Following trialling and testing, consultation with all stakeholders, including the online wagering industry, media and broadcasting industry and key sporting and racing codes, was conducted. This consultation period aimed to determine any implementation issues.

Between 29 August 2022 and 31 October 2022, extensive consultation was undertaken with all relevant stakeholders impacted by the implementation of this measure. Continued information sessions are planned for mid-November 2022 to support the implementation of the measure. Engagement with all stakeholders will continue throughout the implementation period to 30 March 2023.

The research

Is the approach to the implementation of the consistent gambling messaging measure underpinned by research?

The approach to implementing this measure is based on extensive behavioural research. The taglines were developed following trialling and testing with more than 8,300 research participants across 3 stages of research over 2 years. This included experts, academics, regular online wagerers across a range of risk levels, First Nations and culturally and linguistically diverse gamblers:

- Behavioural research conducted by Central Queensland University (CQU) and commissioned by Gambling Research Australia (GRA);
 - Including focus groups of 22 regulators, gambling-treatment providers and academic experts and a randomised control trial of 2,074 regular gamblers.
- Developmental research conducted by Hall & Partners; and
 - Behavioural insights including literature review, focus groups with 104 participants, survey of 2,500 online wagerers;
 - Tagline development including focus groups with 90 participants and a survey of 1,500 online wagerers.
- Market testing conducted by Hall & Partners.
 - Behavioural research including in-depth interviews with 30 participants and survey of 2,000 participants comprising 1000 online wagerers and 1000 general public.

Both industry and gambling harm minimisation advocates were deliberately not consulted on the design of the taglines to ensure independence in outcome was maintained. Rather, the research focused on online wagering consumers including those at-risk of gambling harm, their family, friends and wider community and overseen by state and territory experts called the 'Delphi Group'.

Hall & Partners were commissioned following a competitive procurement process. Hall & Partners is regularly externally audited to comply with ISO 20252 (Market, Opinion & Social Research Standards).

The research underpinning the approach to implementing the consistent gambling messaging measure can be accessed at www.dss.gov.au/communities-and-vulnerable-people-programs-services-gambling/research-into-gambling

Implementation

How long will online wagering service providers have to implement the consistent gambling messages into their advertising campaigns?

Online wagering service providers will have until 30 March 2023 to implement the consistent gambling messages into their advertising campaigns. No requests for extension to this timeframe will be considered by state or territory jurisdictions.

All governments are satisfied that sufficient time to implement this measure has been provided both to enact through regulation, legislation and licensing requirements, and for wagering service providers to undertake the necessary technical development required to implement across all platforms.

The taglines

What is the new suite of taglines?

The consistent gambling messaging measure provides nationally consistent messaging about the risks and potential harm from online wagering. This messaging replaces existing taglines in all instances where these are currently required or displayed.

The suite of taglines are informed by extensive behavioural research. The taglines are:

- Chances are you're about to lose.
- Think. Is this a bet you really want to place?
- What's gambling really costing you?
- What are you prepared to lose today? Set a deposit limit.
- Imagine what you could be buying instead.
- You win some. You lose more.
- What are you really gambling with?

Is there a risk these taglines are stigmatising for individuals experiencing gambling harm?

The suite of 7 taglines were found to perform strongly across a range of metrics and determined to encourage positive behaviour change, without stigmatising gamblers or those at-risk of gambling harm.

None of the 7 taglines performed poorly or jarred with any audience and were determined to have a low-risk of stigmatisation or encouraging harmful behaviours.

A total of 35 taglines were tested through the research. Taglines tested and not recommended included those that could potentially be stigmatising and detrimental to positive behaviour change.

Why are certain taglines only permitted for certain platforms?

The extensive behavioural research underpinning the implementation of this measure determined the impact and effect of certain taglines on certain platforms on intercepting and encouraging positive behaviour change. Some taglines were found to perform strongly across all platforms, while others were determined to perform better on certain platforms. This behavioural research underpins the permitted platforms for certain taglines.

For illustration, the tagline '*You win some. You lose more*' is only permitted for platforms where the tagline is spoken aloud. This tagline was found to be powerful and performed strongly across a range of metrics, but there is a risk that this message can be misread.

Are there specific requirements for advertisements on certain platforms?

The extensive trialling and testing has determined the most effective taglines for each platform, the most effective executions for each platform and the most effective timing, placement and design for each platform.

The behavioural research that underpins the consistent gambling messaging measure determined the most effective communication channels for each tagline and the executions for particular channels.

Based on this research, the taglines are to be applied in the following way:

TV, video and radio advertising have 5 taglines permitted for use:

- Chances are you're about to lose
- What's gambling really costing you?
- Imagine what you could be buying instead.
- You win some. You lose more.
- What are you really gambling with?

In-app, digital, print, social media and website advertising have 6 taglines permitted for use:

- Chances are you're about to lose.
- Think. Is this a bet you really want to place?
- What's gambling really costing you?
- What are you prepared to lose today? Set a deposit limit.
- Imagine what you could be buying instead.
- What are you really gambling with?

Other platforms, such as direct marketing, sponsorship, promotions, outdoor advertising and in-stadium advertising are permitted to use all 7 taglines.

- Chances are you're about to lose.
- Think. Is this a bet you really want to place?
- What's gambling really costing you?
- What are you prepared to lose today? Set a deposit limit.
- Imagine what you could be buying instead.
- You win some. You lose more.*
- What are you really gambling with?

*'You win some. You lose more.' *is only permitted for use when the tagline is spoken.*

How long will these taglines be in use for?

At a minimum, these taglines replace the existing harm minimisation taglines in all instances where these are currently required or displayed. In order to attain national consistency, in some jurisdictions this may mean applying the taglines in additional channels. Operators should satisfy themselves that they are compliant based on the guidelines outlined in factsheets on the [Department of Social Services' website](#) and the regulatory framework in relevant jurisdictions.

Following implementation of all measures, the National Framework will be evaluated to ensure it is delivering intended outcomes for consumers of online wagering services. This evaluation will aim to determine the efficacy of these measures and identify any unintended consequences. The multi-stage evaluation will inform future changes to the National Framework, including whether changes are recommended to the taglines.

Applicable platforms

Where should the new taglines be used?

The key principle for applying a consistent gambling messaging measure tagline is that the new taglines must replace any existing taglines in all instances where these are currently required or displayed.

Wagering service providers should consider the following guiding question when determining if taglines are to be applied:

- *Are there existing regulatory requirements to use a tagline in the jurisdiction where the wagering is licensed, and/or delivering the service?*

If the answer is yes, then wagering service providers are required to use the consistent gambling messaging taglines and the call to action.

Additionally, wagering service providers are encouraged to consider additional locations that are appropriate to display the taglines and call to action.

What if the content is 'branding' as opposed to 'advertising'?

Wagering service providers should consider the following guiding question when determining if the content in question is advertising or branding:

- *Does the wagering service provider have a reasonable degree of control of how the sign is broadcast? and,*
- *Does the example promote a gambling product?*

If the answer is yes to these questions, then wagering service providers are required to use the consistent gambling messaging tagline and the call to action.

Additionally, wagering service providers are encouraged to consider additional locations that are appropriate to display the consistent gambling messaging.

What if a wagering service provider is going above and beyond minimum requirements by displaying existing taglines in contexts where there is not a current regulatory requirement to do so?

The evidence is clear. Current taglines, such as 'gamble responsibly', are not effective at communicating the risks and potential harms from online wagering to consumers nor encourage safer gambling behaviours.

The new suite of evidence-based taglines are demonstrated to be effective at communicating the risks and potential harms from online wagering and encourage positive behaviour change.

Aligning with recommendations of the O'Farrell *Review of Illegal Offshore Wagering*, the use of nationally consistent messaging is more likely to support harm minimisation for online wagering.

Wagering service providers that exceed current regulatory requirements by displaying existing taglines, such as 'gamble responsibly', should continue and are encouraged to replace those taglines to promote harm minimisation.

By adopting the new evidence-based gambling messaging in all instances, wagering service providers are demonstrating their corporate social responsibility and commitment to consumer protections.

Rotation

How frequently do the taglines need to be rotated?

The rotation of taglines aims to mitigate against message fatigue, a key issue experienced with the 'gamble responsibly' tagline.

For TV/video, radio, in-app, digital advertising, print advertising, social media and websites, the applicable taglines are designed to be rotated equally over a 12 month period. Wagering service providers are expected to take reasonable steps to ensure all applicable taglines are employed in advertising equally over a 12 month period.

For 'Other' platforms, rotation of the taglines is strongly encouraged.

Rotation of taglines for horse, harness or greyhound racing programming are to align with the requirements of other platforms as used in the horse, harness or greyhound racing space, for example on TV/video platforms rotation of applicable taglines over 12 months is required.

Can different taglines be used on different platforms at the same time?

The behavioural research underpinning the approach to implementing this measure highlights there is scope to present more than one tagline concurrently on the same or different platforms, by all wagering service providers, this is because the messages operate on different, but mutually supportive mechanisms and do not detract from each other.

The rotation of messages aims to balance prescription while allowing wagering service providers some scope to rotate the messaging so it is relevant to the content of their advertising.

The call to action

Is there a call to action that accompanies the tagline?

The tagline must be accompanied by a call to action. The call to action provides advice to consumers and the broader public about available support services. The call to action encourages individuals experiencing gambling harm to contact the Gambling Helpline or to visit Gambling Help Online for free and confidential support. This service is free, confidential and available 24 hours a day, 7 days a week. This service can also provide advice to family and friends of an individual experiencing gambling harm.

Is there a shortened call to action permitted for use on certain platforms or for certain advertisements?

Due to the restrictions, limitations or requirements of certain platforms, modified or shortened call to actions are required for certain platforms instead of the standard call to action.

The standard call to action is: *For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au*

The modified call to action for TV and Video advertising is: *For free and confidential support, call the number on the screen or visit the website.*

The modified call to action for Radio advertising is: *For free and confidential support visit gamblinghelponline.org.au.*

The shortened call to action is: *Set a deposit limit.*

Which call to action is required for TV and Video advertisements?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For TV and video advertising under 15 seconds in length, the tagline and call to action must be displayed on screen. The tagline must be spoken aloud, but the call to action is not required to be spoken aloud.

For TV and video advertising over 15 seconds in length the tagline and standard call to action must be displayed on screen. The tagline and the modified call to action must be spoken aloud.

TV and video advertising (less than 15 seconds)	
Displayed	Spoken
<i>For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au</i>	Not required to be spoken.
TV and video advertising (over 15 seconds)	
Displayed	Spoken
<i>For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au</i>	<i>For free and confidential support, call the number on the screen or visit the website</i>

Which call to action is required for Radio advertisements?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For radio advertising under 15 seconds in length, the tagline must be spoken aloud but the call to action is not required to be spoken aloud.

For Radio advertising over 15 seconds in length, the tagline and a modified call to action must be spoken aloud.

Radio advertising (less than 15 seconds)	
Spoken	Not required to be spoken
Radio advertising (over 15 seconds)	
Spoken	<i>For free and confidential support visit gamblinghelponline.org.au</i>

Which call to action is required for in-app placement?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For in-app placement, the shortened tagline must be used.

In-app	
Displayed	<i>Set a deposit limit</i>

Which call to action is required for digital advertising?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For digital advertising, the shortened tagline must be used.

Digital advertising	
Displayed	<i>Set a deposit limit</i>

Which call to action is required for print advertising?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For print advertising, the standard tagline must be used.

Print advertising	
Displayed	<i>For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au</i>

Which call to action is required for social media?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For social media advertising with no restrictions on the number of characters allowed in a post, the standard tagline must be used.

For social media advertising with very restrictive character limits, the shortened tagline must be used. The shortened tagline can be included in a linked follow-up post immediately after the original post.

Social media (no character limits)	
Displayed	<i>For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au</i>
Social media (very restrictive character limits)	
Displayed	<i>Set a deposit limit *</i> <i>*Can be included in a linked follow-up post immediately after the original post.</i>

Which call to action is required for use on websites?

Given the limitations or requirements of certain platforms or length of adverts, modified or shortened call to actions are permitted for in certain instances.

For website placement, the standard tagline must be used.

Websites	
Displayed	<i>For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au</i>

Design guidelines and platform requirements

When must the tagline and call to action be spoken?

The tagline and call to action (as required) must be voiced over in TV, video and radio advertisements. When spoken, the tagline and call to action must be spoken at a slow and even pace and in a calm manner. The tagline and call to action can be voiced by any gender.

Are there requirements in narrating the tagline and call to action?

When spoken, the pace of the tagline and call to action must be calm, slow and even. The tagline and call to action can be voiced by any gender.

A perceptible pause must be included between the preceding advertisement and the tagline and call to action.

A perceptible pause must also be included between the tagline and call to action and any subsequent messages, such as 'terms and conditions may apply'.

The pace of the tagline is critical, as a faster-paced tagline is dismissed.

Are there guidelines for how long the tagline and call to action will take to narrate?

During trialling and testing recommended minimum timeframes for the tagline with, and without, the standard call to action (CTA) were determined, as outlined below.

Tagline	Time in Seconds	
	With no CTA	With CTA
You win some. You lose more	1.63	6.81
What are you really gambling with?	1.65	6.83
What's gambling really costing you?	1.68	6.85
Chances are you're about to lose	1.73	6.91
Imagine what you could be buying instead	1.79	6.97
Think. Is this a bet you really want to place? [^]	2.39	7.57
What are you prepared to lose today? Set a deposit limit. [^]	2.47	7.65

[^]These taglines are not applicable for TV, video or radio advertisements, but are permitted for use on Other platforms.

Are there guidelines on the design and execution of the taglines?

For visual executions including TV and video advertising, digital advertising, print advertising, in-app placement, website advertising, amongst others, the taglines must be presented in the largest possible font, consistent across the whole message and take up the majority of the screen.

The design principles based on an A4-size landscape canvas are:

Tagline

- Upper case, Arial bold, 60pt size font
- 1/3 of the canvas

Call to action

- Sentence case, Arial bold, 40pt size font
- 1/3 of the canvas

These design principles should be adjusted based on the orientation of the screen to ensure the tagline and call to action take up a third of the screen each, at a minimum.

A range of execution methods were tested and trialled through the behavioural research, these execution guidelines were found to be the most effective in presenting the message, gaining the attention of consumers, encouraging positive behaviour change and ensuring the tagline and call to action are easily read and understood by consumers and the community. The design principles and visual execution requirements ensure national consistency in implementation of the consistent gambling messaging by all wagering service providers nationwide. This ensures the messaging is easy to understand, legible, and consistently presented by all wagering service providers.

Can I use my own branding colours?

No, the tagline and call to action must be executed in accordance with the design guidelines for the associated platforms.

For TV and video advertising, the tagline and call to action must be presented as white text on a black background. Either white text on a black background or black text on a white background can be used for outdoor advertising.

For in-app and website placement, digital advertising, print advertising and social media advertising, the tagline and call to action must be presented as black text on a white background.

The design guidelines and visual execution requirements provides national consistency in implementation of the consistent gambling messaging measure by all wagering service providers nationwide. This ensures the messaging is easy to understand, legible and consistently presented by all wagering service providers.

Is there execution guidelines for Radio advertising?

For radio advertisements, the tagline and call to action must be spoken at an even pace, with a perceptible pause between the tagline and other messages, such as 'terms and conditions apply'. The voiceover can be any gender. The tagline and call to action should occur at the end of the advertisement.

For radio advertisements under 15 seconds in length, only the tagline is required to be spoken.

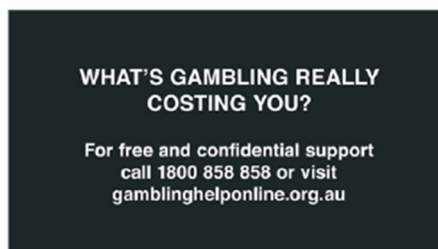
For radio advertisements over 15 seconds in length, the tagline and standard call to action are required to be spoken.

Does the requirement for the tagline apply to 6 second or less radio adverts?

Yes, for all radio advertisements under 15 seconds in length the tagline is required to be spoken. There is no requirement to narrate the call to action.

Is there an example execution that must be replicated for TV and video advertising?

For TV and video advertisements must replicate the format of the example execution. The tagline and call to action must be placed at the end of an advert (not the beginning, which was also tested). The tagline must be presented as white text on a black background to allow the viewer to easily read it, and ensure the messaging stands out from the advert. No other messages or images are to appear on the screen at this time.



TV and video example execution

Does the requirement to narrate the tagline and call to action apply to 6 second or less pre-roll advertisements on TV and video advertising?

For TV and video advertising under 15 seconds in length, including 6 second pre-roll advertisements, the tagline and call to action must be displayed on screen.

The tagline must be spoken, but the call to action is not required to be spoken.

Is the tagline and call to action required for Program Billboard advertisements on TV and video advertising?

The consistent gambling messaging tagline and call to action replaces existing taglines in all instances these are currently required or displayed.

If an existing tagline is currently included in a Program Billboard, these must be replaced with the new consistent gambling messaging taglines.

If no tagline is currently included in a Program Billboard, there is no requirement to use the consistent gambling messaging. Wagering service providers are strongly encouraged to consider additional locations where it may be appropriate to display taglines.

For TV and video advertising under 15 seconds in length, including Program Billboard advertisements, the tagline and call to action must be displayed on screen. The tagline must be spoken aloud, but the call to action is not required to be spoken.

Is the tagline and call to action required for static pop-ups without audio broadcast on television or online streams?

The consistent gambling messaging taglines and call to action replaces existing taglines in all instances where these are currently required or displayed.

If an existing tagline is currently included on a Static Pop-up broadcast on TV or Online, these must be replaced with the new consistent gambling messaging taglines.

If no tagline is currently included on a Static Pop-Up, there is no requirement to use the consistent gambling messaging. Wagering service providers are strongly encouraged to consider additional locations where it may be appropriate to display taglines.

For static pop-ups broadcast on television or online streaming, without audio, the [digital advertising requirements](#) apply.

Is there an example execution that must be replicated for dynamic digital advertising?

For dynamic digital advertising, such as online banner advertising and digital display advertising amongst others, the tagline and call to action must replicate the format of the example execution. The tagline and call to action must be placed at the end of an advert, in the final frame (not the beginning, which was also tested). The tagline must be presented as black text on a white background to allow the viewer to easily read it, and ensure the messaging stands out from the advert. No other messages or images are to appear on the screen at this time.



Digital advertising example execution

Is there example executions that must be replicated for static digital advertising?

For static digital advertising, taglines must stand alone from the advert so as not to be confused with the message contained within the advertisement. The tagline must be presented in large, legible black text on a white background.

Is there example executions that must be replicated for print advertising?

For print advertising must stand alone from the print advert so as not to be confused with the message contained within the advertisement.

The tagline must be presented in clear, easy to read text with the largest possible font consistent across the whole message in black text on a white background.

Is there example executions that must be replicated for website or in-app placement?

For website placement, the tagline and call to action must stand alone from the other material on the website or in-app to ensure the messaging is clearly visible and not confused with other material related to wagering.

For in-app placement, the tagline and shortened call to action are to be placed in at least one of the following locations:

- On a rotating carousel. One banner rotation to include the required tagline and shortened call to action,
- Permanently at the bottom of the home page, and
- Permanently below the bet slip section.

For both website and in-app, the tagline must be presented in large, legible black text on a white background. The font must be clear, legible and easy to read with the largest possible font consistent across the whole message.

Advertisements that appear 'in app' must follow the consistent gambling messaging guidance for the relevant platform.

How does the consistent gambling messaging requirements apply to advertising on a wagering service provider's website?

If a wagering service provider has advertisements displayed on its own website, such as rotating banners advertisements, rotating carousel advertisements, online banner advertisements, amongst others, the digital advertising requirements apply.

Are there special requirements for using Betstop in SMS messages?

In addition to the social media requirements, wagering service providers must consider the following when sending SMS advertising messages:

Has the wagering service provider included in their SMS message a link to a website that contains a reference to BetStop; a statement that BetStop is the National Self Exclusion Register; and a hyperlink to BetStop?

- **Yes** – then the wagering provider is compliant with subsection 25(3) of the Betstop [register rules](#) and does not need to separately reference BetStop in the SMS message. The consistent gambling messaging tagline and call to action are to be used.
- **No** – then the consistent gambling messaging tagline and a reference to BetStop; a statement that BetStop is the National Self Exclusion Register; and a hyperlink to BetStop are to be used.

Is there example executions that must be replicated for social media advertising or promotional content?

Where images are shared on social media platforms, the tagline and call to action must be presented in clear, easy to read text with the largest possible font consistent across the whole message. The tagline must be presented as black text on a white background.

Where text is shared on social media platforms, the taglines must be placed at the end of a post, for example at the end of a Tweet or Facebook post. In addition, the tagline and call to action can be separately posted as stand-alone messages on social media.

Where videos are shared on social media platforms, the example execution for [TV and video](#) must be replicated.

For platforms with very restrictive character limits, the shortened call to action must be used, *Set a deposit limit*. This can be included in a linked, follow-up post, posted immediately after the original post.

What forms of social media posts do the requirements apply to?

The social media advertising requirements apply to:

- Promotional content that contains text and/or images distributed by the wagering service provider or a third-party
- Promotional content that contain videos developed by third parties sponsored by wagering service providers

These requirements apply to all forms of social media advertising, both free and paid.

Videos shared on any social media platforms must align with the requirements for TV and Video advertising.

How do the requirements apply to third-party promotional content on social media?

The taglines and call to action requirements apply to sponsored promotional content developed and delivered by either third-parties on behalf of wagering service providers, or wagering service providers.

These requirements apply to sponsored advertisements the wagering service provider has a reasonable degree of control over and that are being run in exchange for payment or some other form of valuable consideration.

For sponsored promotional video advertising, the social media advertising requirements apply, noting that if it is video content the design guidelines for TV and Video advertisements apply.

Does the use of taglines and the call to action only apply to paid promotional content on social media?

No. The use of taglines and the call to action applies to all advertising and promotional content on social media, regardless of whether this is paid or shared.

Is there example executions that must be replicated for direct marketing materials?

Direct marketing materials sent digitally must comply with the tagline and call to action requirements for [digital advertising](#).

Direct marketing materials sent in hard copy must comply with the tagline and call to action requirements for [print advertising](#).

Direct marketing materials sent via SMS must comply with the tagline and call to action requirements for [social media advertising](#).

Direct marketing conducted via telemarketing (or other spoken forms) must comply with the tagline and call to action requirements for [radio advertising](#).

Do activity statements need to include the tagline and call to action?

There is no requirement for consistent gambling messaging taglines and the call to action to be included on activity statements however, there is a requirement to have a hyperlink to safe gambling support services and consumer protection tools on the activity statement.

How will the taglines apply to outdoor advertising?

The tagline and call to action must be displayed in all instances where an existing tagline is currently required or displayed, including on outdoor advertising.

The requirement to equally rotate all applicable taglines over a 12-month period does not apply to outdoor advertising. Wagering service providers are strongly encouraged to rotate applicable taglines periodically, such as with each advertisement buy, to reduce the risk of message fatigue.

Preference is that the tagline and call to action be distinct in the advertisement so as not to be confused with the message contained within the advertisement. The taglines and call to action are recommended to be presented either with black text on a white background or white text on a black background.

Wagering service providers are encouraged to consider additional locations where it may be appropriate to display taglines.

How will the taglines apply to sponsorship?

The tagline and call to action must be displayed in all instances where an existing tagline is currently required or displayed, including on sponsorship for products, segments, stadia, sporting apparel, on-ground, signage, amongst others.

The requirement to equally rotate all applicable taglines over a 12-month period does not apply to sponsorship. Wagering service providers are strongly encouraged to rotate applicable taglines periodically, such as with each advertisement buy, to reduce the risk of message fatigue.

Wagering service providers are encouraged to consider additional locations where it may be appropriate to display taglines.

How do the taglines apply to Push Notifications?

Recognising the restrictive character limits applied to push notifications, wagering service providers are to send a separate, standalone, push notification with the tagline and shortened call to action immediately after a promotional/advertising push notification. The subsequent consistent gambling messaging push notification should be sent within 15-30 seconds of the direct marketing push notification. Direct marketing materials sent via push notifications must comply with the requirements for social media advertising.

Note: Wagering service providers must also consider the Betstop messaging requirements and comply with subsection 25(3) of the Betstop [register rules](#) for electronic messaging, such as push notifications.

Horse, Harness or Greyhound Racing Requirements

Which forms of racing media does the consistent gambling messaging requirements apply to?

The consistent gambling messaging tagline and call to action applies to all forms of broadcast racing programming for horse, harness and greyhound racing whether these are broadcast on dedicated racing channels or broadcast on free to air TV.

Is horse, harness or greyhound racing exempt from the requirement to use consistent gambling messaging?

Horse, harness or greyhound racing programming are not exempt from the use of the consistent gambling messaging taglines and call to action in instances where existing taglines are currently required and displayed.

However, if there is no requirement for existing taglines to be used where they are not currently being used, such as in the case of branding, then the requirement to use the taglines or call to action does not apply.

Wagering service providers should determine whether the content is considered advertising or branding

- Content is considered advertising if the wagering service provider has a reasonable degree of control over how the gambling product is broadcast and/or a gambling product is being promoted or discussed.
- Content is considered branding if the wagering service provider logo is displayed and/or brand name is spoken but no gambling product is endorsed or promoted. If only the brand name/ logo is displayed or spoken there is no requirement to apply the consistent gambling messaging tagline or call to action.
- Where a gambling product is being promoted through editorial and/or advertorial content and an existing tagline or 'gamble responsibly' is currently used within the content, then the existing tagline should be replaced with a spoken consistent gambling messaging tagline.

It is important to note the aim of this measure is to drive nationally consistent awareness of the risks and potential harms from online wagering and reduce the risk of harm from online wagering to consumers at risk of, or already experiencing harm. Wagering service providers are encouraged to consider additional locations where it may be appropriate to display taglines.

Rotation of taglines for horse, harness or greyhound racing programming are to align with the requirements of other platforms as used in the horse, harness or greyhound racing space, for example on TV/video platforms rotation of applicable taglines over 12 months is required.

If further clarification is required, wagering service providers and dedicated racing media are encouraged to provide examples for IGC consideration to gambling@dss.gov.au.

What if a wagering service provider is sponsoring a certain segment or product and only the brand name is used?

The following guiding questions are to be considered when determining if the consistent gambling messaging applies to sponsored segments, products, or other promotional content:

- *Are there existing regulatory requirements to use a tagline in the jurisdiction where the wagering service provider is licensed, and/or delivering the service?*
- *Is the product advertising as opposed to branding? That is:*
 - *Does the wagering service provider have a reasonable degree of control of how the sign is broadcast? and,*
 - *does the example promote a gambling product?*

If the answer is yes to these questions, then consistent gambling messaging, including the tagline and the call to action, is required to be used in accordance with the requirements of the relevant platforms. If there is no requirement for existing taglines to be used and are not currently being used, then the requirement to use the taglines or call to action does not apply.

It is important to note the aim of this measure is to drive nationally consistent awareness of the risks and potential harms from online wagering and reduce the risk of harm from online wagering to consumers at risk of, or already experiencing harm. As such, the requirement to use the tagline and call to action applies in all instances where an existing tagline is currently required or displayed.

Wagering service providers are encouraged to consider additional locations where it may be appropriate to display taglines.

How does consistent gambling messaging apply to Full Integrations/Odds Integrations on Free to Air TV or Video on Demand?

Full Integrations or Odds Integrations are 30-45 second promotional crosses to a wagering representative who reads through the race field and odds. This can be shown graphically and clearly promotes the name of the wagering service provider and their product or service. These crosses are broadcast on free-to-air TV and Video (both broadcast and video on demand services). These currently display safer gambling messaging.

Consistent gambling messaging is to be applied to all odds integrations on free-to-air TV, Video, or video on demand services such as streaming sites, as follows:

- The tagline and standard call to action (*For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au*) are to be carried at the bottom of the full frame odds graphic for the entire time the graphic is displayed (approximately 30 seconds);
- The tagline is to be rotated equally across the year;
- The font of the messages must be clear, legible and easy to read with the largest possible font consistent across the whole message, and,
- The wagering representative will read aloud the tagline and modified call to action (*For free and confidential support, call the number on the screen or visit the website*) in the verbal sign-off.

How does consistent gambling messaging apply to Short Integrations/Market Movers on Free to Air TV or Video on Demand?

Short integrations or market movers is a small graphic on the lower third of the screen which shows the movement on an individual horse's odds for usually approximately 10 seconds. The horse's odds are announced verbally by a wagering representative and also shown graphically. These crosses are broadcast on free-to-air TV and Video (both broadcast and video on demand services).

Consistent gambling messaging is to be applied to all Market Movers graphics broadcast on free-to-air TV, Video or video on demand services such as streaming sites as follows:

- No tagline is required,
- The shortened call to action is to be displayed (*Set a deposit limit*) for the entire time that graphic is displayed during the broadcast of a market mover; and,
- The font of the messages must be clear, legible and easy to read with the largest possible font consistent across the whole message.

How does consistent gambling messaging apply to Full Integrations/Odds Integrations on Dedicated Racing Platforms e.g. Sky Channel or TAB Radio?

Full Integrations or Odds Integrations are 30-45 second promotional crosses to a wagering representative who reads through the race field and odds. This can be shown graphically and clearly promotes the name of the wagering service provider and their product or service. These crosses are broadcast on dedicated racing platforms, such as Sky Channel or TAB radio. These currently display safer gambling messaging.

Consistent gambling messaging requirements will apply in the following way for Odds integrations broadcast on dedicated racing platforms such as Sky Channel or TAB radio:

- The consistent gambling messaging tagline and standard call to action (*For free and confidential support call 1800 858 858 or visit gamblinghelponline.org.au*) are to be carried at the bottom of the full frame odds graphic for the entire time the graphic is displayed (approximately 30-45 seconds);
- The tagline is to be rotated equally across the year;
- The font of the messages must be clear, legible and easy to read with the largest possible font consistent across the whole message, and,
- The wagering representative will read aloud the tagline and modified call to action (*For free and confidential support, call the number on the screen or visit the website*) in the verbal sign-off.

How does consistent gambling messaging apply to Short Integrations/Market on Dedicated Racing Platforms e.g. Sky Channel or TAB Radio?

Short integrations or market movers is a small graphic on the lower third of the screen which shows the movement on an individual horse's odds for usually approximately 10 seconds. The horse's odds are announced verbally by a wagering representative and also shown graphically. These crosses are broadcast on dedicated racing platforms, such as Sky Channel or TAB radio.

Consistent gambling messaging is to be applied to all Market Movers graphics broadcast on dedicated racing platforms such as Sky Channel or TAB radio:

- No tagline is required,
- The shortened call to action is to be displayed (*Set a deposit limit*) for the entire time that graphic is displayed during the broadcast of a market mover; and,
- The font of the messages must be clear, legible and easy to read with the largest possible font consistent across the whole message.

How does consistent gambling messaging apply to factual odds information displays on Dedicated Racing Platforms e.g. Sky Channel or TAB Radio?

Factual odds information displays are broadcast on dedicated racing platforms such as Sky Channel or TAB radio which are not promotional in nature, but instead purely detail totalisator and fixed odds information. Such displays may include a logo or branding, but these are discrete and do not overpower the information shown.

As factual odds information displays are not promotional in nature, consistent gambling messaging requirements do not apply.

Regulation

How will the consistent gambling messaging measure be regulated?

Consistent with the National Framework National Policy Statement the Consistent Gambling Messaging measure tagline and call to action must be displayed in all instances where an existing tagline is currently required or displayed, replacing previous 'responsible gambling messaging.

All licensed wagering service providers operating in Australia will be required to implement consistent gambling messaging in all promotional and advertising content, regardless of the jurisdiction where they are licensed.

In line with existing broadcasting industry codes of practice registered by the Australian Communication and Media Authority (ACMA) (for example the Commercial television industry code of practice 2015, section 3.12: the promotion of betting odds and commercials relating to betting or gambling during a live sporting event must be accompanied by a responsible gambling message. Does the regulation apply to broadcasters or publishers?

Wagering service providers, are responsible for ensuring their compliance with the requirements of the measure. Publishers/broadcasters must continue to abide by their existing legislative and regulatory requirements.

How will the rotation of taglines be regulated?

Wagering service providers are expected to take all reasonable steps to equally rotate all applicable taglines on relevant platforms over a 12-month period.

Wagering service providers should ensure their compliance with the minimum requirements as specified by the relevant state or territory regulator.

Further information

How can I find out more information about this measure?

Jurisdictions are working with all relevant stakeholders to address implementation queries and clarify expectations, jurisdictions are sharing these insights through the Implementation Governance Committee (IGC) to ensure national consistency. This process will continue throughout the implementation period to 30 March 2023. If you have further questions, please contact gambling@dss.gov.au.

What if I identify more material implementation issues?

If an issue has not been previously raised and considered by the Implementation Governance Committee (IGC), please email the IGC Secretariat at gambling@dss.gov.au with the issue and a proposed solution. The issue will be assessed and considered by the IGC. If the IGC determine further clarification is required the guidance material (including the FAQ document) will be updated and wagering service providers will be notified of the amendment. This process will continue throughout the implementation period.

When does the consultation period cease?

The Implementation Governance Committee (IGC) has noted a significant reduction in the amount of implementation issues identified by stakeholders for further consideration.

To support wagering service providers to implement the Consistent Gambling Messaging measure by 30 March 2023 and be assured of no further major changes to implementation guidance, the IGC have agreed the period for raising any remaining material implementation issues will end on **6 February 2023**.

If, during the implementation process you find major implementation issues, the IGC will review, however this will only be done by exception.