

Questions on Notice

#	Issue	Question on Notice	Sportsbet response
1	RTI interventions	<p>Mr Evans: To round that out, and to finish with the simple stat that you started out asking for, what we've seen with real-time intervention before—and this is just the one tool that we're talking about—is that against the addressable base that real-time intervention has been live for there has been an increase in excess of 20 per cent of people setting deposit limits. From that, we conclude that the early evidence is encouraging.</p> <p>We're making a difference, but we're just six months into this. It's a really complex tool, and we've got an awful lot of resources—in terms of data science, technology, then the safer gambling teams—analysing every which way to ensure that it's having the impact that we intend. We don't know yet whether 20 per cent is the right number. Should that be higher? Should there be more types of friction? Should there be different triggers? We simply don't yet know. But the product's live, we're encouraged by it, and we think that it will mature into— literally—a game-changing product, which is why in our recommendations we said we think this should become the norm. To that end, we'd offer the technology and the data science to our competitors.</p> <p>Mr CONAGHAN: <u>That 20 per cent is positive, but in terms of the real-time intervention, have you suspended accounts? Have you taken action on that level?</u></p> <p>Mr Evans: Yes, we have.</p> <p>Mr CONAGHAN: Do you know how many accounts?</p> <p>Ms Abbotto: Not as it relates to real-time intervention, but what I can share with you is the number of accounts that have gone on to permanently self-exclude in the last 12 months with SportsBet, which is about 4,800. What happens when real-time intervention or any other form of data that we use triggers a safer-gambling</p>	<p>At Sportsbet we use a range of qualitative and quantitative measures to monitor customers who may potentially experience gambling harm. Our monitoring program ranges from red flag behavioural alerts through to machine learning models that predict and identify at risk behaviour allowing prevention and intervention. All of these exist in unison and are summarised in 3 key approaches:</p> <ul style="list-style-type: none"> • Predictive Scores; • Behavioural Alerts; and • Real Time Intervention (RTI). <p>In 2022, the combination of all of these led to 119,913 interventions, ranging from scaled automated interactions (e.g. Email, SMS, In-App) through to Safer Gambling Interactions by our trained Safer Gambling specialists, which may result in the application of Safer Gambling Tools.</p> <p>Of these 119,913 total interventions in 2022, RTI-based interactions with customers represented 19,506 instances, with 261 of these instances resulting in an account being suspended. Of the customers who interacted with RTI, approximately 29% had deposit limits placed on their accounts.</p> <p>Note - RTI commenced roll out in June 2022, and therefore the above figures for RTI in 2022 reflect six months of the system operating in the calendar year to a proportion of Sportsbet's customer base. RTI is currently operational to 50% of our customer base, with plans to reach 100% by mid 2023. When live across our full customer base, we expect RTI to represent almost half (approximately 45%) of all interventions, and approximately 3,000 accounts being suspended per year. It should be noted that because RTI is preventative in nature and is designed to intervene before a customer can escalate into problem gambling, we expect fewer account closures as a result of this tool relative to other forms of intervention which are broadly reactive in nature.</p>

		<p>intervention by one of our safer gambling experts is that they have complete discretion to make decisions based on the data they see and the information provided by a customer—both qualitative and quantitative insights— about whether the customer should play on. A customer might choose to permanently self-exclude, but where they don't, and we think that their behaviour is in any way unsafe, our safer gambling officers have discretion to close a customer account permanently to ensure that we don't allow customers to play on unsafely.</p>	
2	Safer gambling tools and RTI	<p>Ms CHANEY: Mr Evans, you say that they have an interaction with a safer-gambling officer as a third tier, with the AI tool. How frequently does that actually happen? What are the consequences afterwards? Are the safer- gambling officers incentivised to act in the interest of the customer or in the interest of the company? What actually happens when someone has a conversation?</p> <p>Ms Abbotto: Our safer-gambling officers operate 24/7. There are interactions that are happening day and night as the data alerts them that an individual needs contact. In effect, those alerts go to the safer-gambling officers. They attempt to contact a customer, typically within 15 minutes. If they're not able to contact the customer, the customer's account is blocked if the alert is deemed critical. They then remain in suspended status until they speak to someone who can validate that they are playing safely. The safer-gambling officer will then inquire about the customer's level of play. They will at times seek evidence of whether the customer is playing within their means, whether they have contemplated their spend and whether they are comfortable with the amount of time that they are spending on platform. They'll seek evidence of that from the customer. At that point—</p> <p>Ms CHANEY: What sort of evidence do you mean? Do they just ask them, 'Are you okay? Are you spending within your limits?' and they say, 'Yep, I'm fine'?</p>	<p>In addition to the data provided in Sportsbet's submission to the Inquiry in November 2022 and our appearance before the Committee on 4 April 2023, the opportunity to provide further information on notice has allowed us to correlate our most recent data which was not previously available. It has also provided an opportunity to further break down the interventions data as requested in this Question on Notice, building on the data previously provided from 2021.</p> <p>In 2021, 97,000 safer gambling interventions took place with Sportsbet customers, ranging from scalable automated interactions (e.g. email, SMS, in-app) through to safer gambling interactions by our trained Safer Gambling Specialists which could result in the application of safer gambling tools.</p> <p>In 2022, this number had increased to 119,913 safer gambling interventions with Sportsbet customers, mainly due to the introduction of RTI. Of the 119,913 interventions that took place, there have been 20,915 instances that, after being reviewed by a Safer Gambling Officer, resulted in contact (a phone call) being made with a customer. Data on this is outlined in the table below.</p> <p>Contact made from the Safer Gambling Officer can result in the setting of Deposit Limits, the application of break periods, and can also include Sportsbet imposing lifetime exclusions. In the instance a Safer Gambling Officer attempts to contact a customer and is unable to speak to them, accounts are blocked until successful contact and resolution.</p>

	<p>Ms Abbotto: It's variable. At times that will be conversational, and they'll ask the customer to share with them how they've spent their time and other things. These safer gambling officers are well trained in the responsible service of wagering, in mental health first aid and other things. They are well trained to detect signs of problem gambling, but they also have the opportunity to ask a customer to provide evidence of their source of wealth so that they can understand that they are playing appropriately and that they are not spending beyond their means. All those facilities are available to the safer gambling officers.</p> <p>Ms CHANEY: They're available, but are they actually used?</p> <p>Ms Abbotto: Yes, they are used.</p> <p>Ms CHANEY: <u>I'm happy for you to take this on notice, but could you provide some data on how frequently that happens? You said there are 97,000 interventions. I'd like some understanding of how many times there's actually a phone call and what the consequence of the phone call actually is—if they said they're fine or if it's 'can you please provide evidence of your income?' or a block. It's one thing to say the tools are available, but whether they're actually being used would be useful to know.</u></p> <p>Ms Abbotto: I'm very happy to take that on notice. One piece of information that I can share is that in excess of 60 per cent of the contact that we have with customers results in the customer setting a deposit limit that is determined to be appropriate to them and their spend. I think that is a statistic that we try quite closely, and safer gambling officers also have the option of placing customers onto breaks or, alternatively, permanently self-exclude in them. But I'm very happy to take that on notice and come back with some further information for the committee.</p>	<p style="text-align: center;">Table 1: Outcomes from Safer Gambling Officer Contact in 2022</p> <table> <tr> <th>Outcome when customer contact is made</th><th>Triggers</th><th>% of Total Triggers</th></tr> <tr> <td>Email Sent</td><td>594</td><td>2.8%</td></tr> <tr> <td>Unable to Make Contact – Account Suspended</td><td>9,426</td><td>45.1%</td></tr> <tr> <td>Betting Within Limits</td><td>3,401</td><td>16.3%</td></tr> <tr> <td>Deposit Limit Applied</td><td>6,513</td><td>31.1%</td></tr> <tr> <td>Break or Long Exclusion Applied</td><td>593</td><td>2.8%</td></tr> <tr> <td>Life-Time Exclusion</td><td>386</td><td>1.8%</td></tr> <tr> <td>Deposit Limit Refusal - Account Suspended</td><td>2</td><td>0.0%</td></tr> <tr> <td>Total</td><td>20,915</td><td>100%</td></tr> </table> <p>Of customers successfully contacted, approximately 60 per cent set a deposit limit (6,513 of 11,489 successfully contacted).</p> <p>Please find attached two recordings of calls between Sportsbet's Safer Gambling Team and customers. The two calls provide examples of real-life calls that occur between Sportsbet's customers and our safer gambling specialists, helping to ensure safer gambling tools are utilised where appropriate by customers to encourage safe play.</p>	Outcome when customer contact is made	Triggers	% of Total Triggers	Email Sent	594	2.8%	Unable to Make Contact – Account Suspended	9,426	45.1%	Betting Within Limits	3,401	16.3%	Deposit Limit Applied	6,513	31.1%	Break or Long Exclusion Applied	593	2.8%	Life-Time Exclusion	386	1.8%	Deposit Limit Refusal - Account Suspended	2	0.0%	Total	20,915	100%
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		<p>Mr Evans: I think we can go one better than that for the committee. <u>We'll supply the data, but I think we'll supply either some transcripts or some recordings of calls so that you can get a real-life example.</u></p> <p>Ms Abbotto: That's a good idea.</p> <p>Mr Evans: Further to that, in case you worry that we would be self-selecting as to the examples we give you, we invite you to come and visit the office. You can sit in and actually oversee. They call it double-jacking. You can listen in to the call from the safer gambling office, and I think that you'd be reassured by the intent and the content of those calls. I'm really proud of that team. They have a really good proactive listening and probing style that gets beyond the superficial in the conversation. I think they do a fantastic job, and we'd be proud to let you see them in action.</p>	
3	Illegal offshore wagering	<p>CHAIR: What are the unintended consequences that have been documented?</p> <p>Ms Abbotto: We're obviously aware of the example that you've spoken about—the government monitoring. There are also examples of mandatory deposit limits being applied and also affordability being assessed, and what we've seen well reported in jurisdictions where that has occurred—and we would agree completely with the policy intent around prevention; that's exactly what RTI goes to do—is that a large proportion of the wagering activity has gone offshore into unprotected markets. We know that in Australia the ACMA works very hard to restrict access to those offshore operators, but we also know that VPN technology allows that to be circumvented. We're open-minded, and we appreciate why the question is asked and the aspiration for prevention. We're just conscious that we should contemplate how that plays out over time and whether it achieves the harm minimisation objectives.</p> <p>CHAIR: <u>No-one has provided us with those reports and that evidence. So if you have evidence, research or reports to back what</u></p>	<p>PwC Review on behalf of the Betting & Gaming Council (BGC)</p> <p>Commissioned by the BGC, PwC conducted a 'Review of unlicensed online gambling in the UK' which was published in February 2021. The Report can be accessed at the following link: https://bettingandgamingcouncil.com/uploads/Downloads/PwC-Review-of-Unlicensed-Online-Gambling-in-the-UK_vFinal.pdf</p> <p>This report found:</p> <ul style="list-style-type: none"> • The proportion of UK online gamblers using an unlicensed operator has increased from 2.2% to 4.5% between 2018/19 and 2020. That equates to an increase from c.210,000 players to 460,000 in 2020; • PwC asked online gamblers in its survey about whether they would look for new operators in response to a range of potential restrictions in operators' offerings, with a significant proportion of respondents stating that they would do so. Over 30% of online gamblers said they would consider looking for new operators if they were asked to provide additional evidence on affordability or source of funds or if fewer products or games were available.

	<p><u>you've said—and I take what you say as correct—we would benefit from that, because all we have so far is just people saying that unintended consequences can be driving people offshore, and no-one has provided us with a regulator or anyone who's provided evidence to support that.</u></p> <p>Ms Abbotto: I'd be very happy to. There is a piece of independent research, which we'll share with you, conducted by PwC in the UK that specifically looks at the offshore consequences of some of the blanket bans that have been imposed in different European jurisdictions. I would be happy to provide that to the committee. We'll take that on notice.</p>	<p>The report provided further data on other European markets, and found:</p> <ul style="list-style-type: none"> • Norway: introduced a state monopoly for all gaming coupled with restrictions on stakes, affordability checks and advertising, which resulted in a black market that now accounts for over 66 per cent of all money staked; • Denmark: restricted inducements and introduced mandatory deposit limits, as well as increasing tax on gross gaming revenue. The Danish Tax Authority estimated these changes would lead to a 9 per cent increase in black market share; and • Sweden: limited inducements and introduced mandatory deposit limits of approximately AUD \$700 per week. A survey of players that hit these deposit limits revealed that over one third (38 per cent) avoided the limits by still being able to bet online with unlicensed operators. <p>YouGov survey on behalf of the BGC</p> <p>In March 2023, the BGC undertook a further survey through YouGov, which found:</p> <ul style="list-style-type: none"> • Nearly 80 per cent of respondents said they would not want to see mandatory limits imposed by bookmakers on how much punters can spend; • 79 per cent of punters said it was likely increased restrictions “would result in people moving to unregulated websites” where there are no limits; and • 70 per cent stated they would consider a different bookmaker if they were asked to provide “private financial documents” in order to place a bet. <p>The results of the YouGov survey are available at the following link: https://bettingandgamingcouncil.com/news/punters-fear-restrictions</p> <p>Sportsbet customer survey</p> <p>In a survey of 2,684 Sportsbet customers conducted in April 2023:</p>
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4	Regulatory audits	<p>CHAIR: What about the prospect of a regulator being able to audit online bookmakers' compliance with using real-time interventions or harm-reduction measures, or paying attention, however they do it, to red flags? Do you have any issues with that?</p> <p>Ms Abboto: No. It's my understanding today that most regulators have the authority and jurisdiction to instruct that an operator provide evidence that their processes and practices are working and be subject to audit.</p> <p>CHAIR: How often has that happened with Sportsbet in Australia and any of the 26 regulators that you're subjected to?</p> <p>Mr Evans: I couldn't tell you the number, but it happens often.</p> <p>CHAIR: <u>You can take that on notice if you like. I'd be very interested to know the type of audit, which regulator has asked for it and how often that happens—in a 12-month period, if that's easier.</u> I will let you go soon, but I just want to clarify something. I was a little bit confused by some of the evidence about the Take a Break function, with people receiving inducements after that.</p>	<p>Sportsbet operates in a heavily regulated environment that comprises 26 specialist regulators across the states and territories, and the Commonwealth.</p> <p>As an example, we are regulated by the Northern Territory Racing Commission (NTRC) for our sports bookmaking licence; in each state and territory jurisdiction by their relevant regulators to ensure compliance with their individual online wagering regulations; and at a Commonwealth level by bodies including the Australian Communications and Media Authority (ACMA) and the Australian Transaction Reports and Analysis Centre (AUSTRAC) for their respective areas of responsibility.</p> <p>As part of this regulatory oversight, we are subject to regular audit activity to demonstrate our risk management and compliance processes.</p> <p>Over the last 12 months, Sportsbet has undertaken 12 separate audits covering a range of regulatory and compliance areas across those regulatory bodies. This includes audits covering cyber security, data privacy, AML/CTF compliance, spam, financial reporting, product fees and tax, as required by regulators including the NTRC, AUSTRAC, ACMA, the Department of Home Affairs, the Australian Securities and Investments Commission (ASIC), and each of the relevant racing bodies in all states and territories.</p>

5	Inducements and marketing	<p>CHAIR: <u>Are you able to say, then, and you can take this on notice, the proportion of your customers who Take a Break and are assessed as not suitable to give them marketing materials, when they come back from their break, as opposed to the numbers who Take a Break and then it's back to normal broadcasting features and they get the inducements—</u></p> <p>Mr Evans: I understand the question and the distinction you're making. I don't have the data to hand or, indeed, in my head. It's a cross-tabulation of two or three different forms of analysis. I'm very happy to take it on notice.</p> <p>CHAIR: If you're able to take that on notice, I would appreciate it.</p> <p>Mr Evans: Yes, completely.</p>	<p>Where a customer decides that they would like a break, Sportsbet makes four options available to them:</p> <ol style="list-style-type: none"> 1. <u>Deactivate Account</u> – where a customer selects this option, the customer's account with Sportsbet is deactivated. It cannot be accessed by a customer unless the customer contacts Sportsbet and requests that it be reactivated; 2. <u>Take a Short Break</u> – under this option, a customer can nominate a period between one and 30 days. Once nominated, the customer's account is suspended for the nominated period. In the last 12 months, 21,046 customers have opted to take a Short Break; 3. <u>Implement a Long-Term Exclusion</u> – under this option, a customer can nominate a period between 6 months and five years. Once nominated, the customer's account is suspended for the nominated period. In the last 12 months, 6,909 customers have opted to implement a Long-Term Exclusion; and 4. <u>Implement a Lifetime Exclusion</u> – under this option, a customer can nominate to close their Sportsbet account permanently. Where a customer takes this step, the customer is not able to open a new account with Sportsbet at any future time. In the last 12 months, 4,754 customers have implemented a lifetime exclusion. <p>Customers do <u>not</u> receive marketing communications from Sportsbet nor are they able to place a bet nor receive any generosity from Sportsbet, for the duration that their account is 1) deactivated or 2) suspended for a short break. The same applies to a customer that selects a Long-Term or Lifetime Exclusion.</p> <p>Where a customer has nominated to take a break or a long-term exclusion, customers are not able re-activate their account early, and must serve the entire nominated break period. The same applies for Lifetime exclusions, in which these are permanent and cannot be reversed.</p> <p>Short breaks can often be used by customers as a healthy and responsible way to manage playing safely. As such, when a short break ends, a customer can begin using their account again and if they had previously “opted in” to</p>
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Areas for clarification

#	Issue	Hansard	Sportsbet additional clarification
1	RTI evidence and research	<p>Ms CHANEY: I have one more. You've talked a bit about the real-time intervention and the experiments that you're doing in that area. Given that we don't yet have an evidence base for the effectiveness of regulated real-time intervention, would you support immediate government regulation that does have an evidence base for preventing harm now, including mandatory universal precommitment, proof of finance, a ban on inducement marketing and broader advertising reductions or bans—these things that do actually have an evidence base?</p> <p>Ms Abboto: I think I said earlier that we support the premise of pursuing options that go to prevention, and that is something that sits at the centre of the solutions that we're pursuing. We recognise that the committee has asked us to provide some information, with respect to the evidence base, that shows the unintended consequences of those blanket bans. Whilst we recognise that there is some evidence reported with respect to the consumer protection benefits attached to those wide-sweeping and universal bans, we also recognise that the committee should take into consideration whether what those things do is resulting in people playing in jurisdictions that aren't regulated. That is why we are keen to form an evidence base around technology like real-time intervention. There is emerging research, which was completed in 2022, that talks to the benefits of deposit limits and real-time intervention and leveraging artificial intelligence, and therefore we'd just ask that the committee contemplates those and all of the evidence that exists with respect to consumer protection, not just a component of that evidence.</p> <p>Ms CHANEY: It's the pushing it offshore argument again. If we make changes, the amount of harm won't change, it will just move to less regulated offshore providers.</p> <p>Mr Evans: I'd also challenge the premise of the question slightly, albeit respectfully. I think you described RTI as an experiment and implied</p>	<p>The concept of real time intervention in the gambling space has been contemplated by researchers as part of a field known as persuasive technology.</p> <p>In 2022, researchers investigated RTI by considering the perceptions of data-driven, real-time, persuasive interventions for supporting responsible online gambling amongst gamblers. This is a key element to understanding how acceptable, and therefore successful, RTI would be in the online gambling space. The research was undertaken by considering RTI coupled with traditional interventions, such as deposit limits.</p> <p>The researchers found that both ex-problem and current gamblers viewed data driven, interactive, real-time technology positively, meaning that it could be used to help a range of individuals. In addition to this, the researchers concluded that real-time intervention provided a promising opportunity considering it reaches customers whilst their gambling is under control and provides the ability to tailor customer support.</p> <p>The research is available at the following link: https://link.springer.com/chapter/10.1007/978-3-030-98438-0_3</p> <p>The results of Sportsbet's implementation of RTI reinforces the academic research. RTI-based interactions with customers, since June 2022, represented 19,506 instances, with 261 of these instances resulting in an account being suspended. Of the customers who interacted with RTI, approximately 29% had deposit limits placed on their accounts.</p> <p>RTI is currently operational to 50% of our customer base with plans to reach 100% by mid 2023.</p> <p>We thank the Committee for its interest in the RTI tool and Sportsbet reaffirms its commitment, as stated during the Inquiry hearing, to making our proprietary IP available to all bookmakers to help collectively improve consumer protection across all providers. We welcome further</p>

		<p>that it lacked any evidence. It's not an experiment; it's a really expensive product. It took hundreds of people two years to build, and we're utterly committed to it. And already there is data and evidence to suggest that it is having a positive impact. You heard me talk about in excess of 20 per cent of consumers or customers, an extra 20 per cent of customers setting deposit limits. So it's not an experiment, and there is evidence—already—albeit in its nascent form, to suggest that it's having a beneficial impact.</p> <p>Ms CHANEY: <u>And understanding that evidence base would be useful.</u> Additional customers setting deposit limits is great. I suppose the challenge is understanding what the harm is before and after or how you actually assess the harm that's not being addressed by the tool. I understand that some of the evidence we've had is older than the new introduction of this model. But it does seem that the general perspective of people who have had problems with gambling is that there are ways around these tools and that they continue to experience that harm.</p>	<p>consideration by the Committee, and the Government, of the role RTI can play as the basis of future intervention tools to help prevent harm occurring.</p>
2	At-risk indicators	<p>Mr Evans: It would be my observation, both from anecdotal and other insight, that the vast majority of people using the Take a Break tool are using it constructively to moderate their behaviour knowingly. I would refer you to Tania's response previously. At the point at which you contemplate another instance of harm occurring, that's when other tools come into play. <u>There are 200 variables that we monitor in our predictive modelling, one of which is the frequency of breaks.</u> There are two tools working in concert at that point.</p>	<p>In 2019, Sportsbet developed and introduced its predictive risk model, referred to as the Safer Gambling Model. Sportsbet's proprietary machine learning model is used to risk-rate customers every day. The model uses 129 of the most relevant and targeted attributes (out of a total 695) to help predict and identify if a customer's actual behaviour indicates they may be displaying early behaviours that could lead to gambling harm. The model does this by looking up-stream and making future predictions based off past customer behaviour ('look-a-like' modelling).</p> <p>Based on this look-a-like modelling, each day a customer receives an individual score between zero and one, the higher the number the more likely a customer is to potentially be experiencing harm. The score places customers in one of three unique zones that drives appropriate intervention and actions:</p> <ul style="list-style-type: none"> • Play Well Zone • Watch Zone

			<ul style="list-style-type: none"> • Act Zone <p>The Watch Zone leads to the following interventions to occur:</p> <ul style="list-style-type: none"> • Marketing Suppression – customers do not receive marketing material during this period; • No Relationship Management/Account Management; and • Targeted intervention – this includes a series of automated interactions (e.g. Email, SMS & In-App). <p>The Act Zone leads to the interventions as outlined in the Watch Zone, plus:</p> <ul style="list-style-type: none"> • Safer Gambling Intervention by SG Specialist, which could result in an application of a Safer Gambling Tool (such as a mandatory deposit limit); and • Account suspension. <p>The Safer Gambling model is retrained weekly to ensure that the most important attributes are used at any given time.</p>
3	Social media and age gating	<p>Mr CONAGHAN: I'm interested in Sportsbet's foray into TikTok. Do you agree that TikTok is generally targeted at younger people?</p> <p>Mr Evans: Firstly, let's be very clear. We offer a product that is available to adults and not minors, and we seek all of our marketing communication to be directed at adults. For the record, it's my understanding that more than three-quarters of TikTok's audience is adult, in fact. But let's be very clear—where we work with the likes of TikTok or any other social media platform, we only work with partners who have reliable and robust age-gating technology so that we can direct our communication at adults.</p> <p>Mr CONAGHAN: <u>But how can you ensure, bearing in mind that every kid walking around with a mobile phone has got TikTok on their mobile, that Sportsbet advertising doesn't reach them?</u></p>	<p>Sportsbet does not market gambling products or the brand to minors, and we work hard with our partners to ensure our marketing does not reach minors on social media.</p> <p>Adherence to robust age-gating solutions is essential when we consider advertising on any social media channel. All platforms we use are age-gated at a minimum of 18+.</p> <p>In September 2022, Sportsbet entered into an advertising pilot with TikTok. Given the wagering category had previously been restricted on the platform, TikTok and Sportsbet agreed to further age-gating measures as an extra precaution:</p> <ol style="list-style-type: none"> 1. Core age-gating: Declared age - TikTok requires a minimum declared age to be eligible to view wagering content. This means only users who submit an appropriate date of birth

	<p>Mr Evans: Because we only work with partners such as TikTok who have reliable and robust age-gating technology.</p> <p>Mr CONAGHAN: Can you explain the process that you both, your partnership, engage in together to make sure that it doesn't happen?</p> <p>Mr Evans: We require, through dialogue and documentation with those parties, that they have the reliable and robust age-gating technologies so that we can be confident. I'll give you an example of when that didn't happen. When Snapchat launched in Australia, at that point in time I was running marketing for Sportsbet. My team refused to engage in commercial partnership with Snapchat for, I think, the best part of two years whilst our competitors carried on, because we weren't convinced that at that point in time Snapchat had the reliable age- gating technology.</p> <p>Mr CONAGHAN: I understand. Thank you. I might pass over to Kate Chaney.</p>	<p>when signing up for a TikTok account can see a Sportsbet ad.</p> <p>TikTok maintains a neutral, industry-standard age-gate that requires individuals to provide their date of birth. It is neutral in that it helps to discourage people from simply clicking a pre-populated minimum age and they are not nudged towards the 'right' age. This is one tool that assists the platform to determine a user's age.</p> <p>2. Further age-gating: Inferred age - While most people understand the importance of being truthful about their age, some may not provide the correct information. For this reason, as disclosed in TikTok's Privacy Policy, they also 'infer age for the purpose of personalising content'. This is a technology which Sportsbet uses in addition to the industry-standard age gate.</p> <p>Sportsbet runs paid advertising only on TikTok, and there is no organic activity from Sportsbet on the platform as it cannot be age-gated.</p> <p>TikTok and other social media platforms also have several features that allow users to opt out of advertising if they wish.</p>
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