



AANA DISCUSSION PAPER:

**AANA WAGERING ADVERTISING &
MARKETING COMMUNICATIONS CODE**

A mandatory and enforceable self-regulatory system of advertising and marketing communication by Australian licensed wagering service providers that complements the existing legal and regulatory framework

INTRODUCTION

The Australian Association of National Advertisers (AANA) is developing the *AANA Wagering Advertising & Marketing Communications Code* (the Code) to provide a robust framework for mandatory and industry enforced self-regulation of all advertising and marketing communication by licensed Australian-based wagering service providers.

The purpose of this Discussion Paper is to promote a dialogue with all interested stakeholders and to stimulate informed input into the development of a Code. Submissions received in response to this paper will assist the AANA in preparing a draft Code for consideration by the AANA Board.

THE AANA AND SELF-REGULATION

Advertising and marketing communication plays an important role in the national and international economy and society. It takes many forms, including advertising in traditional and digital media, consumer engagement on social media platforms and direct-to-consumer marketing. It drives consumer choice in the commercial and non-commercial sectors and promotes competition. As a result, it helps consumers and the wider society to be better informed, to achieve insights and understandings and to secure value for money. As a key driver of demand, it enables innovation to be brought to market and stimulates economic growth and employment. More specifically, it underwrites the economic viability of commercial (and some public sector) media and enhances the variety of media content.

The AANA has been the peak national body for advertisers in Australia for over 80 years. It is engaged in a wide range of activities on behalf of its members, including the development of formal self-regulatory mechanisms. These self-regulatory mechanisms serve to protect the interests and rights of consumers by helping to ensure advertising and marketing communication is conducted responsibly. They are also designed to represent the common interests and obligations of companies across all business sectors involved in marketing communication.

AANA's advertising self-regulatory scheme came into operation in 1997 following extensive consultation by AANA with consumers and consumer groups, advertisers and business and government representatives. The system, which has the support of all the major media owners and their associations, includes both code making expertise and an independent complaints handling system administered by the Advertising Standards Bureau. It is a national system that is technology and platform neutral and applies to virtually all marketing communication, whether or not the brand owner is an AANA member.

The AANA Code of Ethics provides the overarching set of principles to which all advertising and marketing communication, across all channels, should comply. The object of the Code of Ethics is to ensure that marketing communication is legal, decent, honest and truthful and that it has been prepared with a sense of obligation to the consumer and society and a sense of fairness and responsibility to competitors. The Code of Ethics is widely regarded as the standard for ethical behaviour by advertisers and marketers as well as advertising and marketing agencies. The vast majority of complaints dealt with

by the Advertising Standards Bureau relate to elements of this over-arching Code.

In addition to the Code of Ethics, the AANA currently administers three other codes:

- Food & Beverages Advertising and Marketing Communications Code
- Advertising & Marketing Communications to Children Code
- Environmental Claims in Advertising and Marketing Code

AANA codes are acknowledged and supported by government as an important self-regulatory mechanism to assist in achieving public policy outcomes.

The AANA Codes are:

- incorporated by reference in other industry sector codes which are subject to legislation e.g. the Broadcasting Services Act 1992 and the Commercial Television Industry Code of Practice;
- referenced in other industry specific self-regulatory codes and initiatives such as the ABAC Responsible Alcohol Marketing Code, the Outdoor Media Association Code of Ethics and the Australian Food and Grocery Council responsible marketing initiatives;
- promoted by commercial enterprises including through their legal and advertising policies; and
- covered in advertising and marketing education and widely referenced in education materials such as marketing textbooks.

A key strength of the AANA self-regulatory system is the commitment to regular review and amendment of the Codes to maintain universality (application to all media and all brands) and to address specific problem areas. Examples include the extension of the Codes to apply to marketing in all media formats, including social media and user-generated content, which is within a brand owner's control.

Compliance with the codes is enforced by the Advertising Standards Bureau, an operationally-independent complaints handling and dispute resolution service. Complaints to the Bureau are adjudicated by the Advertising Standards Board, made up of individuals who are representative of the wider community. This complaints-based system offers the public an opportunity to participate in facilitating advertisers' compliance with the codes. It provides a free, open and transparent mechanism to address concerns about the content of advertisements and other marketing communication. Further information on the complaints procedures and complaint outcomes is available at www.adstandards.com.au.

CONSULTATION PROCESS

Consultation on the Discussion Paper will be undertaken through:

- written submissions from any interested party; and
- discussions between interested stakeholders and the AANA.

The information gathered through these processes will assist the AANA to clarify the issues and formulate the AANA Wagering Advertising & Marketing Communications Code.

The AANA invites submissions from all interested parties. Written submissions or enquires on this discussion paper may be made as follows:

By email: aanasubmissions@aana.com.au

By mail AANA Wagering Code Discussion Paper
Suite 301, 100 William Street
Sydney NSW 2011

The closing date for submissions is 5pm on 18 December 2015.

AANA requests that all submitters clearly identify:

- the name of the party making the submission;
- the organisation or interest group represented by the submission (where relevant); and
- contact details – including telephone number, postal address and email address (if available).

DEVELOPMENT OF THE AANA WAGERING ADVERTISING AND MARKETING COMMUNICATION CODE

Development of the Code will take into consideration the environment within which the Code will exist, including the industry context and the existing regulatory framework. This will help to determine the scope, purpose and application of the Code. This section of the discussion paper describes the context for and key features of the Code, posing questions about what should be included in the final Code.

INDUSTRY CONTEXT

A number of current contextual industry issues would be taken into consideration in the development of the Code. These include the impact of the international environment, the current and potential scope of wagering services, the relevance of the Code and the potential benefits that could be realised.

In terms of the international perspective, there must be recognition of the fact that the wagering and sportsbetting industry is global in its reach and Australia cannot act in isolation from the global market. With this in mind, it is imperative that stakeholders distinguish the relatively small group of highly regulated Australian licensed wagering service providers from the thousands of illegal offshore online gambling operators that offer services to Australian residents with much less rigorous regulatory standards. Australia wide, as at January 2015, there were approximately 56 online sports and race wagering sites accepting customers from Australia, using Australian Dollars¹.

There is also the potential for overly burdensome advertising and promotional restrictions on licensed Australian-based wagering service providers to have the unintended consequence of encouraging offshore operators to further target Australian consumers, putting domestic wagering providers at a significant commercial disadvantage and channelling Australian demand for an established industry offshore beyond the reach of Australian regulations and potential taxation revenues.

The development of national standards for harm minimisation and consumer protection that cover advertising, responsible gambling, licensing requirements and probity standards must be evidence-based, not detrimental to the competitiveness of the industry and achievable from an operational and technical perspective. The Code must reflect these criteria if it is to be effective and relevant.

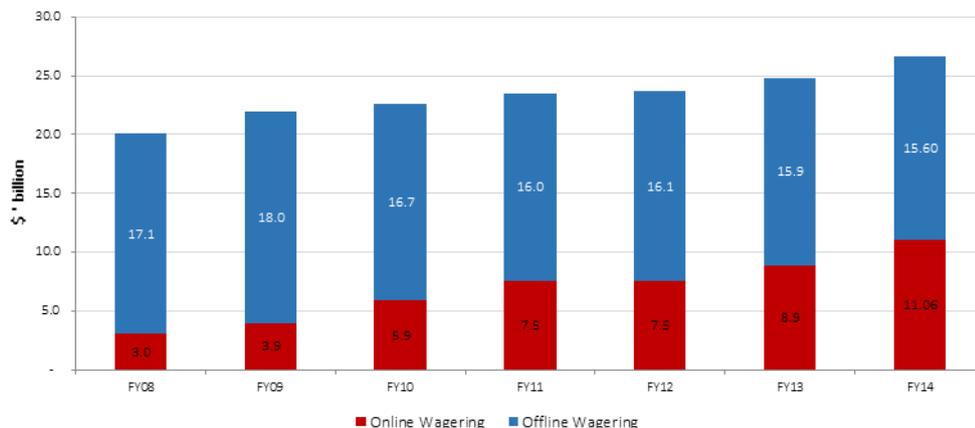
In terms of the size and shape of the wagering and sportsbetting industry, while there has been only moderate growth in wagering turnover from 2007, there has been a material shift in the betting channels where that spend is occurring. Improved technology and better innovation has seen a shift from the more traditional wagering channels (i.e. retail outlets, on-course and phone operators) to online channels such as websites and mobile applications using computers, digital television, smart phones and tablet devices.

Figure 1 below shows total wagering turnover from 2008 to 2014 and the relative contributions of the

¹ Gambling Research Australia Report, *Marketing of Sports Betting and Racing*, Dr Sally Gainsbury, et al, May 2015.

on-course, retail, telephone operator and internet channels and illustrates the growth in the internet and mobile channel and the decline in the retail and telephone channels.

Figure 1: Australian Wagering Industry Turnover by Channel



With this in mind, the Code must be applicable across both traditional and emerging platforms, as well as those platforms which have not yet been developed. Platform neutrality of the Code, meaning that it applies to wagering advertising and marketing regardless of how that wagering service is delivered, ensures that it remains relevant in the future.

The Code should also not deter the advertising of wagering and sportsbetting services offered by Australian licensed wagering service providers from offering a range of functions², such as:

- informing consumers about the relative characteristics of wagering products;
- informing consumers of the identity of licensed Australian-based wagering service providers through which they can participate in wagering in a highly controlled and consumer protected environment while avoiding the significant dangers which exist from wagering with illegal offshore operators;
- promoting competition, and therefore efficiency, by informing consumers of the existence of multiple suppliers of wagering products (particularly new entrants);
- developing 'brand' recognition with associated incentives for wagering service providers to maintain the quality of their service in order to protect this brand value; and
- ensuring customers receive responsible gambling messages when viewing, where practical, any advertising and marketing activities to ensure they can make informed and responsible decisions about their recreational choices.

² Productivity Commission Inquiry Report, Gambling, 2010, page K1

Consultation questions

1. **How can the Code ensure that it does not place overly burdensome regulation on licensed Australian-based wagering service providers while maintaining strong levels of consumer protection, harm minimisation and protection for the integrity of sport and racing and the industry as a whole from the increasing influence of illegal offshore operators?**
2. **Do you know of any other evidence-based research which could inform the development of the Code? If so, please give details.**
3. **Are there any other industry issues which would impact the effectiveness of the Code? If yes, please give details.**

EXISTING REGULATORY FRAMEWORK FOR WAGERING ADVERTISING IN AUSTRALIA

Australian licensed wagering service providers who wish to advertise their legal wagering products and services in Australia are required to comply with a complex mix of laws, regulations, industry codes and agreements.

In doing so, restrictions arise from a number of sources, including:

1. Gambling legislation at the federal level via the Interactive Gambling Act (IGA) (Cth) 2001 and also concurrently at the relevant state and territory level. State gambling laws remain of relevance in determining how interactive gambling is regulated in Australia. For example, whilst an activity may not be prohibited under the IGA, that does not mean it is necessarily permitted in each state and territory;
2. Australian Consumer Law which provides uniform legislation for consumer protection, applying as law of the Commonwealth of Australia and is incorporated in the law of each of Australia's state and territories;
3. Gambling legislation at a state/territory level - Licensed wagering service providers must comply with jurisdictional state and territory laws which place restrictions on the manner in which they can promote and advertise their wagering services. These restrictions include the requirement to include responsible gambling messages, restrictions on the times advertisements can be placed on broadcast media and limitations on the content of those advertisements;
4. State/territory licensing bodies, such as the Northern Territory Director-General of Licensing

(Director-General) and the Tasmanian Gaming Commission.

5. State/territory regulatory bodies that are responsible for gambling regulation in the respective jurisdiction, such as the South Australian Independent Gambling Authority, which developed the South Australian Gambling Codes of Practice Notice.
6. Sports controlling bodies and racing bodies that govern and oversee events and enter into detailed Product Fee and Integrity Agreements with wagering service providers which set terms for access to their products and require them to comply with numerous obligations including those relating to integrity. For example, the NRL for the State of Origin Series and the AFL for its competitions.
7. National standards for advertising set by broadcast industry codes which include the Commercial Television Industry Code of Practice, Commercial Radio Australia Codes of Practice and the Australian Subscription Television and Radio Association. These codes are developed in consultation with the Australian Communications and Media Authority (ACMA). The ACMA only includes a code in its register if:
 - it is satisfied it provides appropriate community safeguards for the matters covered;
 - it was endorsed by a majority of providers of broadcasting services in that industry sector; and
 - members of the public have been given an adequate opportunity to comment.

It is a standard wagering licence condition that Australian wagering service providers comply with these broadcast industry codes. The broadcast codes are, therefore, a very strong regulatory measure and are effectively a legislative instrument.

For example, advertising restrictions for odds promotions and gambling advertisements in live sport were introduced into the Commercial Television Industry Code of Practice, Commercial Radio Australia Codes of Practice and Australian Subscription Television and Radio Association Codes of Practice in 2013. This resulted in a significant reduction in advertising and promotion of wagering services during live sports broadcasts. Time restrictions are also placed on commercials relating to betting and gambling in the Commercial Television Industry Code of Practice;

8. Advertising industry self-regulatory codes, such as the AANA Code of Ethics, which provide the overarching set of principles with which all advertising and marketing communications, across all media, should comply. The Advertising Standards Board makes determinations on advertisements under this self-regulatory approach. Similar self-regulatory approaches exist in the UK, Italy, France and in Spain³.

³ Gambling Compliance, Gambling Advertising and Sport: A Comparison of Regulated Markets, 2013

WHY IS THE CODE NEEDED?

Industry has a responsibility to ensure that advertising and marketing activities are delivered in a responsible manner with consideration given to the potential impact on Australians adversely affected by gambling. It is recognised that a small proportion of Australians do not gamble responsibly and the community is also concerned about children's exposure to gambling.

The proposed Code would complement the existing legislative, regulatory and industry self-regulatory framework. This would ensure that all advertisers and marketers continue to develop and maintain a high standard of social responsibility in the advertising and marketing of wagering products in Australia whilst balancing the need to protect Australian consumers from the growing influence of illegal offshore operators, often with links to organised crime syndicates, and the subsequent threats of these offshore operators to the integrity of Australian sport and racing.

In 2011, a Parliamentary Joint Select Committee report stated that:

If the ability to advertise and offer inducements in a regulated Australian environment was limited, this could make people more likely to use overseas websites if they are susceptible to such advertising and offers.⁴

On 12 March 2013, the Department of Broadband, Communications and Digital Economy released its 2012 Final Report into the review of the *Interactive Gambling Act 2001 (IGA) (Cth)* calling for industry to establish an advertising code of conduct, recommending:

That the Australian licensed online gambling industry establish an industry code of conduct to ensure such advertising is not contrary to community standards and expectations. (Recommendation 18)⁵.

Members of the AANA who are wagering service providers and the Australian Wagering Council (AWC) have indicated their willingness and desire to work with the AANA to establish an industry code of conduct on advertising and marketing standards, to be administered by the AANA. AANA wagering service provider members and the AWC are committed to delivering their wagering and sportsbetting operations with the highest levels of integrity and social responsibility, and in accordance with the promotion of responsible gambling.

⁴ Parliamentary Joint Select Committee on Gambling Reform, Second report—Interactive and online gambling and gambling advertising; Interactive Gambling and Broadcasting Amendment (Online Transactions and Other Measures) Bill 2011, p. 62.

⁵ Department of Broadband, Communications and the Digital Economy (DBCDE) review of the IGA (DBCDE, 2013). Final Report p.

PURPOSE OF THE CODE

The AANA Code of Ethics already applies to advertising and marketing of wagering services in respect of:

- the portrayal of people, or depiction of material, which discriminates or vilifies on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief;
- the use of sexual appeal which is exploitative and degrading;
- the portrayal of violence;
- the treatment of sex, sexuality and nudity;
- the use of language which is inappropriate in the circumstances, including strong or obscene language; and
- the depiction of material contrary to prevailing community standards on health and safety.

The proposed Code would complement the existing legal and regulatory framework, including the AANA Code of Ethics, to provide protections for Australians and for Australian racing and sport. It would provide a comprehensive set of restrictions which would apply to wagering advertising and marketing communications in any medium or direct to consumer marketing. Complaints would be adjudicated independently by the Advertising Standards Board.

The Code would be designed to ensure that the advertising and marketing of wagering products and services by wagering service providers is:

- undertaken in a socially responsible manner and incorporates evidence-based harm minimisation, consumer protection and responsible gambling standards, particularly in relation to children, young people and vulnerable consumers; and
- conducted in a manner that complies with all relevant Commonwealth and state/territory laws, regulations and codes.

In doing so, the Code would recognise that wagering is a legitimate leisure activity and that the overwhelming majority of Australians who wager on racing and sport do so safely and responsibly and make informed decisions about their recreational choices.

The Code would also recognise that the right to advertise is an important distinguishing legal entitlement granted only to those wagering service providers who have agreed to meet Australian standards and are subject to the strict Australian regulatory environment.

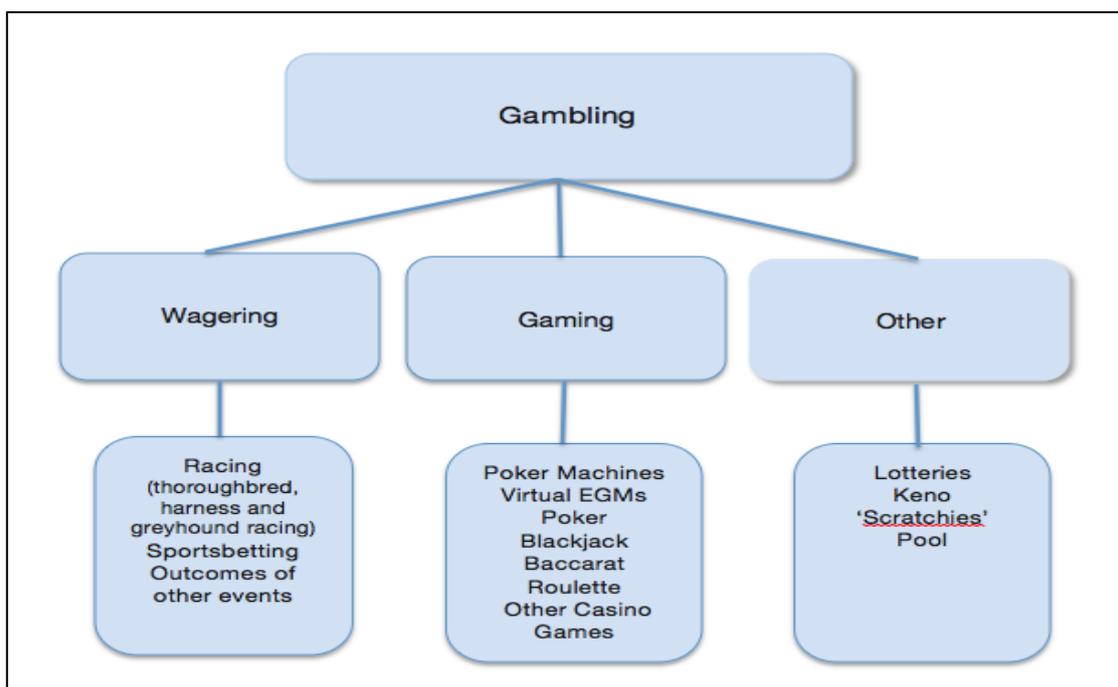
Consultation questions

5. Are any of the purposes detailed above superfluous? If so, why?
6. Are there any other specific purposes which the Code should meet?
7. Are there any other codes or regulations which the Code should reference explicitly or with which it should align?

APPLICATION OF THE CODE

The extent to which gambling advertising is permitted in Australia depends on the forms of gambling involved as shown in Figure 2.

Figure 2: Forms of Gambling



The Interactive Gambling Act 2001 (IGA) (Cth) contains a prohibition on the broadcast or publication of interactive gambling advertisements in Australia but excludes wagering services from this prohibition. It is also illegal for unlicensed offshore operators to advertise in Australia.

As such, the Code would be mandatory for all Australian licensed wagering service providers and would cover the advertising of wagering services – that is thoroughbred, harness and greyhound racing,

sporting events and betting on other events. This includes both traditional retail and online wagering service providers including betting exchanges.

Casinos, casino games, electronic gaming machines, lotto and lottery products and trade promotions would not be covered by the Code as they are not defined as wagering services or products for the purpose of this Code.

The Code would apply to advertising services that are legally permitted. Complaints to the ASB will not be able to be made about whether or not a particular service should be advertised or whether it is able to be advertised. The Code applies to the content of the advertisement not its placement.

The Code would apply to all forms of advertising and marketing communication of wagering products and services undertaken by Australian licensed wagering service providers, irrespective of technology or platform delivery.

The Code WOULD apply to all marketing communication in Australia generated by or within the reasonable control of a marketer. This includes, but is not limited to:

- brand advertising (including trade advertising);
- competitions;
- digital marketing (including mobile and social media and user generated content);
- advertorials; and
- marketing collateral.

The Code WOULD NOT apply to:

- materials or activities whose sole purpose is to educate about responsible gambling and which do not include a company's product branding; or
- information in company annual reports, corporate public affairs messages, or internal company communications.

The Code would seek to ensure that advertising and marketing communication, in the particular industry of wagering services, is prepared in a responsible manner with a sense of obligation to the consumer and society.

A key feature of the self-regulatory system is the benefit to consumers. It is therefore appropriate that, as consumers do not distinguish between types of advertising, neither should the Code. The platform neutral self-regulatory model provides for the ASB to receive all complaints without the consumer having to consider the medium in which the relevant advertisement appeared.

Consultation questions

- 8. Other than wagering on thoroughbred, harness and greyhound racing events and sporting events (including esports and novelty events), are there any additional types of online wagering which should be covered by the Code? If so, please explain why.**
- 9. Is there any reason that certain media formats should not be covered by the Code? If yes, please give details.**

STANDARDS AND PRINCIPLES

The proposed Code would not undermine existing federal and state/territory laws, regulations and obligations that apply to wagering services. These laws will continue to apply.

Wagering advertising and marketing:

- must comply with applicable state/territory and federal laws;
- must comply with all sports controlling bodies and racing bodies obligations; and
- must comply with the relevant industry codes of practices such as the broadcast industry codes (which are registered by the ACMA) and other AANA codes such as the *AANA Code of Ethics*.

The proposed Code would apply to wagering advertising in addition to those requirements.

Complaints may only be made to the ASB for alleged breaches of the proposed Code or other AANA Codes, not in relation to alleged breaches of other laws, regulations or obligations.

Following a review of all jurisdictional requirements and obligations, the following concepts may be considered as the basis to develop standards that could apply to provide the effective and robust framework for the responsible advertising and marketing of wagering products and services in Australia:

In relation to vulnerable persons, wagering advertising and marketing:

- must not depict minors, unless they are shown in an incidental role in a natural situation (for example, in a team playing sport) and where there is no implication they will engage in wagering activities;
- must not depict an adult who is under 25 years of age unless:
 - they are shown in an incidental role in a natural situation (for example, in a team playing sport) and where there is no implication they will engage in wagering activities;
 - they are not engaging in wagering activities in a visually prominent manner; or
 - they are shown in an advertising or marketing communication that has been placed in an age restricted environment such as premises that do not admit minors or a suitably age restricted digital platform;
- must not, with regard to the theme, visuals and language used, be targeted to or appeal particularly to minors;
- must not reflect or be associated with youth culture, including by featuring a character or personality with particular appeal to minors; and
- must respect the need to protect minors and other vulnerable persons from harm or exploitation.

In relation to social responsibility, wagering advertising and marketing:

- must promote responsible gambling;
- must not suggest that winning will be a definite outcome of participating in wagering activities;
- must not suggest that participation in wagering activities is likely to improve a person's financial prospects;
- must not suggest a link between gambling and seduction, sexual success or enhanced attractiveness;
- must not depict or promote the consumption of alcohol whilst engaged in a wagering activity;
- must not expressly state that a customer's skill can influence the outcome of a wagering activity; and
- must ensure that terms and conditions associated with marketing promotions have been made available.

Consultation questions

- 11. Should any of the standards listed above not be included? If so, why?**
- 12. Are there any other standards which should be explicitly included in the Code? If so, please give details.**

PENALTIES FOR BREACHES OF THE CODE

As with existing AANA codes, it is not proposed that there be any financial penalties proposed under the Code, rather the resulting commercial consequences of breaching the Code would constitute sufficient penalty. These consequences would include:

- the direct and indirect costs of withdrawing an advertisement; and
- the reputational cost when a non-compliance decision is made public, including possible adverse media coverage.

There is a 99.5% overall average compliance rate with ASB's determinations during its 16 year history.

COMPLAINTS MECHANISM

The complaint process should be transparent and accessible to all members of the public. The process should provide fairness for complainants and the licensed wagering service providers who advertise their services.

The complaints handling system for the Code would be administered by the Advertising Standards Bureau (ASB), with complaints adjudicated by the Advertising Standards Board (the **Board**). The Board is made up of individuals who are representative of the community and not connected to either the advertising or wagering industries, thereby providing an independent complaints procedure.

The ASB would accept all complaints in relation to the content of advertising and marketing activities of Australian licensed wagering service providers, regardless of the type of media to which they relate, and the Advertising Standards Board would assess any such complaints under the *AANA Code of Ethics*, the *AANA Code of Advertising and Marketing to Children* and the *AANA Wagering Advertising & Marketing Communications Code*. Advertisers and marketers must comply with decisions of the Advertising Standards Board.

The Board would not adjudicate on complaints which are unrelated to advertising, such as the conduct or activities of the licensed wagering operator.

Although a complaint may be about a matter that the Board can consider, a case will not be raised if the issue is one that the Board has consistently considered not in breach of any of the relevant AANA Codes.

Board determinations would be published on the ASB website.

Note: The Advertising Standards Board is funded by a levy on advertising administered by the Australian Advertising Standards Council Ltd.

COMPLAINTS IN RELATION TO OFFSHORE OPERATORS

In relation to offshore operators, the *Interactive Gambling Act 2001* (Cth) contains an express prohibition on the broadcast or publication of interactive gambling service advertisements in Australia by unlicensed offshore operators.

As such, it is proposed that complaints about the advertising and marketing activities of offshore operators will not be determined by the Board but rather complainants should deal with the Australian Communications and Media Authority as is the current practice.

Consultation questions

- 13. Do you have any additional suggestions or comments on the proposed Code?**
- 14. Are there any changes you would suggest to the definitions of the words or phrases in the following Glossary?**
- 15. Are there any words or phrases that need to be added to the Glossary?**

DEFINITIONS/GLOSSARY

In the proposed Code:

Adult means a person who is 18 years old and older.

Advertising or Marketing Communication means:

- A. any material which is published or broadcast using any Medium or any activity which is undertaken by, or on behalf of an advertiser or marketer, and
- over which the advertiser or marketer has a reasonable degree of control, and
 - that draws attention of the public in a manner calculated to promote or oppose directly or indirectly the product, service, person, organisation or line of conduct;
- B. but does not include:
- labels or packaging for products
 - corporate reports including corporate public affairs messages in press releases and other media statements, annual reports, statements on matters of public policy and the like
 - in the case of broadcast media, any material which promotes a program or programs to be broadcast on that same channel or station.

Advertising Standards Board means the board appointed by the Advertising Standards Bureau from time to time, the members of which are representative of the community to administer a public complaints system in relation to Advertising or Marketing Communications.

Australian Association of National Advertisers (AANA) means the association responsible for representing Australia's national advertisers and for developing the self-regulatory system for advertising and marketing communication which is underpinned by an independent, transparent and robust complaints handling system administered by the ASB.

Australian Communications and Media Association (ACMA) means the independent statutory authority tasked with ensuring Australia's media and communications legislation, related regulations, and codes of practice, such as the broadcast industry codes operate effectively and efficiently, and in the public interest.

Children and Young People – see Minors.

Proposed Code means the AANA Wagering Advertising & Marketing Communications Code.

Digital Advertising means advertising through digital platforms including (but not limited to) social media, applications, blogs, brand websites, instant messaging, livecasting, microblogs, mobile communications and messaging, online/banner advertising and social networks

Direct to consumer includes any direct communication between a marketer and consumers, including but not limited to print, electronic or face-to-face.

Medium means any medium whatsoever including without limitation cinema, internet, outdoor media, print, radio, telecommunications, television or other direct to consumer media including new and emerging technologies.

Minors refers to persons younger than 18 years of age.

Online Wagering means those wagering activities permitted in Australia under the Interactive Gambling Act 2001 (IGA) (Cth) which are provided online.

Prevailing Community Standards means the community standards determined by the Advertising Standards Board as those prevailing at the relevant time in relation to Advertising or Marketing Communications.

Vulnerable person means people who can reasonably be considered to be vulnerable because of factors such as mental, social or emotional immaturity; impaired judgment, for example because of alcohol or other drug addiction.

Wagering means a product or service which relates to betting on, or on a series of, horse races, harness races, greyhound races, or sporting events; or a product or service which relates to betting on an event, or a series of events or other contingencies.