

16<sup>th</sup> June 2021

Committee Secretary  
Parliamentary Joint Committee on Corporations and Financial Services  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Committee Secretary,

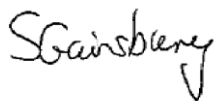
Thank you for the opportunity to contribute to your inquiry into the regulation of the use of financial services such as credit cards and digital wallets for online gambling in Australia.

Our submission aims to provide evidence relevant to this inquiry based on the academic literature and empirical data that we have collected through surveys of gambling populations. Limited studies have investigated the links between credit card and digital wallet use, gambling behaviour, and gambling harm. The limited evidence available suggests that the risks associated with gambling on credit cards (or digital wallets linked to credit facilities) outweigh the benefits, especially for the most vulnerable individuals. Multiple alternative payment options are available that minimise the risks associated with gambling on credit cards for consumers, meaning a prohibition approach would not unnecessarily impinge on the rights of the general population. We note some potential unintended consequences that should be monitored. We recommend that further research be commissioned to understand the impact of payment methods on the development and experience of gambling problems. Nonetheless, it is our view that a ban on credit card payment for interactive wagering services should be implemented.

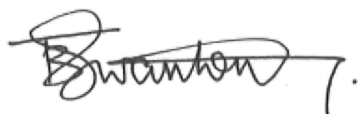
We wish to acknowledge the many individuals who have participated in our studies and the numerous organisations who have supported our research. We continue to actively study the impact of payment methods on gambling and the possibilities for harm minimisation interventions at the point of payment. We would welcome the opportunity to discuss this submission or our broader research with any interested parties.

We look forward to hearing the outcome of this inquiry.

Sincerely,



Sally Gainsbury, PhD  
Associate Professor  
Director, Gambling Treatment & Research Clinic



Thomas Swanton  
PhD Candidate

## SUBMISSION TO THE PARLIAMENTARY JOINT COMMITTEE ON CORPORATIONS AND FINANCIAL SERVICES:

### REGULATION OF THE USE OF FINANCIAL SERVICES SUCH AS CREDIT CARDS AND DIGITAL WALLETS FOR ONLINE GAMBLING IN AUSTRALIA

#### ***What are the risks and concerns associated with credit card payments for gambling?***

##### The role of consumer credit in gambling problems

Gambling with borrowed money, such as by using credit cards (or digital wallets linked to credit facilities)<sup>1</sup>, is a risk factor for experiencing gambling problems.<sup>2</sup> However, remarkably little research has focused on the source of funds used to pay for gambling transactions, or how someone's choice of payment method relates to their gambling behaviour and risk of experiencing gambling-related harm. Gambling problems generally stem from individuals spending more time and/or money gambling than what they can personally afford.<sup>3</sup> Financial problems are almost always a fundamental consequence of problematic and disordered gambling. Financial problems are prevalent among individuals experiencing gambling problems, and can range from depleted savings to more severe harms, such as debt problems and bankruptcy.<sup>4</sup> A survey of 3,199 Australian online gamblers found that higher household debt was a significant predictor of experiencing gambling problems.<sup>5</sup> Less severe financial problems, including reduced savings and low-level debt, are among the most common harms experienced by individuals who gamble, including those at low- and moderate-risk of experiencing gambling problems.<sup>6</sup> This indicates that gambling-related financial harms are not limited to individuals experiencing severe levels of gambling problems, but can affect gamblers across the spectrum of risk.

Financial problems can play a key role in motivating gambling behaviour, for example, by motivating individuals to chase money lost gambling in attempts to 'get even'. For some people, winning a jackpot could be 'life changing' and gambling could be perceived as an avenue out of financial hardship. For example, a survey by ING reported that 33% of Australians in debt cite gambling as a strategy to alleviate their financial problems.<sup>7</sup> Such strategies are highly problematic as persisted gambling invariably leads to financial losses given regulated gambling activities always involve a house advantage. Use of credit cards or other consumer credit products may accelerate the development of gambling problems as individuals accumulate debt to fund continued gambling.

Credit cards enable individuals to gamble with more money than what is currently available to them, for example, in their savings. Alternatively, individuals experiencing gambling problems may turn to credit cards and other consumer credit products as a source of funds to cover day-to-day expenses due to the extent of their expenditure on gambling. Gambling transactions are typically treated as 'cash equivalent' or 'cash advance' transactions by financial institutions, meaning that the use of

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<sup>1</sup> Throughout this submission, we consider credit card payments for gambling to include both those which occur using a physical credit card, as well as those which occur via a smartphone payment app or digital wallet linked to a credit account, unless stated otherwise.

<sup>2</sup> Swanton, T. B., & Gainsbury, S. M. (2020). Gambling-related consumer credit use and debt problems: A brief review. *Current Opinion in Behavioral Sciences*, 31, 21–31. <https://doi.org/10.1016/j.cobeha.2019.09.002>

<sup>3</sup> Ladouceur, R. (2004). Gambling: The hidden addiction. *Canadian Journal of Psychiatry*, 49(8), 501–503. <https://doi.org/10.1177/070674370404900801>

<sup>4</sup> Shannon, K., Anjoul, F., & Blaszczynski, A. (2017). Mapping the proportional distribution of gambling-related harms in a clinical and community sample. *International Gambling Studies*, 17(3), 366–385. <https://doi.org/10.1080/14459795.2017.1333131>

<sup>5</sup> Gainsbury, S. M., Russell, A. M. T., Hing, N., & Blaszczynski, A. (2018). Consumer engagement with and perceptions of offshore online gambling sites. *New Media & Society*, 20(8), 2990–3010. <https://doi.org/10.1177/1461444817738783>

<sup>6</sup> Shannon, K., Anjoul, F., & Blaszczynski, A. (2017). Mapping the proportional distribution of gambling-related harms in a clinical and community sample. *International Gambling Studies*, 17(3), 366–385. <https://doi.org/10.1080/14459795.2017.1333131>

<sup>7</sup> Hely, S. (2020, January 29). The shocking number of Aussies trying to gamble their way out of debt. *Money Magazine*. <https://www.moneymag.com.au/aussies-gambling-debt>

credit cards to pay for gambling is a relatively expensive payment option for consumers.<sup>8</sup> Cash advances can quickly become very costly for consumers because they attract additional fees, high interest rates, and do not include interest-free periods. In a review of online gambling conducted by the UK's Responsible Gambling Strategy Board, it was noted, "[t]he cost of gambling with a credit card is so high that it is hard to envisage why consumers would choose to pay in that way, unless it was to gamble with money not otherwise available to them" (p. 3).<sup>9</sup> Discussions between the authors of this submission and online wagering operators and financial institutions indicate that many consumers are unaware of the costs associated with using credit cards to gamble.

#### Research on credit card use for gambling

Few studies have examined the impact of credit card use on gambling and gambling problems. In an unpublished survey of 564 customers of Australian online wagering companies, Gainsbury, Procter, and Blaszczynski found that 82% had used either a debit or credit card to make deposits.<sup>10</sup> Participants classified as being at low risk of gambling problems were more likely than those with no problems to have used credit cards to make deposits with gambling operators. Similarly, participants reporting at least some level of gambling problems were more likely than those with no reported gambling problems to have used a credit card to make deposits (see Table 1). The reported use of other sources of credit was too low to detect any differences between participants based on their risk of experiencing gambling problems.

Swanton and Gainsbury investigated consumer credit use and experience of debt problems among Australian adults who participate regularly in gambling.<sup>11</sup> A sample of 309 participants (83.8% male; mean age 41.5 years) who had gambled in the past 30 days were recruited through online notices disseminated by financial counselling and gambling support services, online wagering companies, and via social media. When asked about their use of different types of credit and loans to access money for any purpose, 43.0% of respondents indicated that they had used credit cards in the past 12 months (see Table 2). Of this group ( $n = 133$ ), 51.1% reported that their credit card use was related to their gambling (see Table 3).

Among the group of 68 respondents reporting gambling-related credit card use:

- 54.4% met criteria for problem gambling, and a further 19.1% met criteria for moderate risk gambling (see Table 4);
- 26.5% reported seeking formal help for either gambling or debt problems from a support service, such as a gambling help, financial counselling, or legal aid service, within the past 12 months;
- 13.2% indicated that they had entered into a formal financial hardship agreement with a bank, credit provider, or Centrelink within the past 12 months;
- 5.9% reported that they had experienced financial hardship causing them to be either formally declared bankrupt or to enter into a formal debt or personal insolvency agreement.

Although these findings are preliminary in nature, this evidence suggests that gambling-related credit card use is common among people experiencing severe gambling problems relative to those without gambling problems. Moreover, credit card-related debt problems appear to be prevalent among people experiencing severe gambling problems (see Table 5).

<sup>8</sup> Swanton, T. B., Gainsbury, S. M., & Blaszczynski, A. (2019). The role of financial institutions in gambling. *International Gambling Studies*, 19(3), 377–398. <https://doi.org/10.1080/14459795.2019.1575450>

<sup>9</sup> Responsible Gambling Strategy Board. (2018). *RGSB advice on remote gambling*. <https://www.rgsb.org.uk/Publications/Publications.aspx>

<sup>10</sup> Gainsbury, S. M., Procter, L., & Blaszczynski, A. (2018). *Survey of customers of Australian online wagering operators* [Unpublished Honours thesis]. The University of Sydney.

<sup>11</sup> Swanton, T. B., & Gainsbury, S. M. (2019). *Debt stress mediates the relationship between problem gambling and comorbid mental health problems* [Unpublished Honours thesis]. The University of Sydney. Swanton, T. B., & Gainsbury, S. M. (2020). Debt stress partly explains the relationship between problem gambling and comorbid mental health problems. *Social Science & Medicine*, 265, 113476. <https://doi.org/10.1016/j.socscimed.2020.113476>

### ***Should the use of credit cards be prohibited for online gambling?***

The use of credit cards for online gambling should be prohibited as the associated risks appear to outweigh any potential benefits for consumers, especially for vulnerable populations such as individuals experiencing gambling problems. Borrowing money for gambling, including through use of credit cards, constitutes a significant risk factor for the development and/or exacerbation of gambling problems. Given gambling products are treated as cash advance transactions, consumers incur high interest rates and additional fees, and do not benefit from interest-free periods usually available for purchases made using credit card products. Therefore, there appears to be minimal benefit associated with the ability to use a credit card for gambling relative to using a debit card, aside from being able to access funds for gambling in excess of what is personally affordable.

However, we note a lack of exploratory research investigating why consumers might prefer using credit cards for gambling and whether this could help them to manage their gambling spend, for example, by allowing them to track their online wagering deposits across operators through one account. We also note that there are some efforts being made by financial institutions to allow customers to voluntarily opt-in to block their credit cards from being used for gambling as a harm-prevention measure. We welcome such initiatives and encourage financial institutions to extend their efforts by providing a range of consumer protection tools and measures, such as limiting the amount customers can gamble using credit cards and providing proactive notifications and alerts to assist customers in tracking their online wagering spend.

Considering the availability of alternative electronic payment methods for online gambling transactions, such as debit cards and direct deposit, a prohibition on credit card payments for online gambling would not unnecessarily impinge on the rights of the general population.

#### International context

A move to prohibit the use of credit card payments for online gambling would be consistent with contemporary policy and regulatory developments in comparable international jurisdictions. Since April 2020, the UK Gambling Commission has banned the use of credit cards as a payment method for gambling products.<sup>12</sup> This ban applies to all forms of Internet gambling and to land-based betting. Responsibility lies with gambling operators to stop customers gambling with a credit card. In addition, licenced gambling operators are prohibited from accepting payments made by credit card via a money service business, such as by using e-wallets (e.g., PayPal).

The UK Gambling Commission's decision to ban credit card payments for gambling drew on (limited) evidence of the impacts in relation to harm, for example, that credit cards are disproportionately used by those who are already experiencing harm.<sup>13</sup> Remote gambling operators and financial services firms that responded to the Gambling Commission's consultation on gambling with credit cards opposed the ban on credit card payments for gambling. In contrast, almost all consumers who had experienced harm from credit card gambling (as a gambler themselves or as a relative of someone who had used credit cards to fund gambling) were wholly supportive of a ban. The reasons they gave were:

- Credit cards have enabled them, or their family members, to incur tens of thousands of pounds of unrepayable gambling debt due to high credit limits and a lack of friction in the credit card deposit process for online gambling;
- The level of friction a ban would bring would have prevented them experiencing harm to such an extreme degree (i.e., it would have forced them to slow down their gambling activity);
- Additional fees incurred through gambling with a credit card have led them to chase losses to an even greater extent to cover those fees, rather than the fees serving to discourage them from gambling;

<sup>12</sup> Gambling Commission. (2020). *Changes to licence conditions and codes of practice on the use of credit cards for gambling: Consultation response*. <https://www.gamblingcommission.gov.uk/PDF/Consultation-responses-2020/Credit-card-responses-document-final-for-the-pdf-version.pdf>

<sup>13</sup> Gambling Commission. (2020). *Consultation on gambling with credit cards*. [https://consult.gamblingcommission.gov.uk/author/consultation-on-gambling-with-credit-cards/supporting\\_documents/Print%20the%20whole%20consultation%20%20gambling%20with%20credit%20cards.pdf](https://consult.gamblingcommission.gov.uk/author/consultation-on-gambling-with-credit-cards/supporting_documents/Print%20the%20whole%20consultation%20%20gambling%20with%20credit%20cards.pdf)

- While some credit card gamblers may use other forms of borrowing if credit cards were no longer an option, a ban would at least provide a delay in the immediate access to borrowed funds (i.e., creating friction in the gambling process);
- Their appreciation of monetary value was lost when using a credit card for gambling, exacerbating their loss of control;
- It can take several years to pay off debts incurred on credit cards through gambling.

There have been no formal evaluations of the impact of the UK credit card ban, although evaluation efforts are planned.

### ***What are the potential consequences of prohibiting credit card payments for online gambling?***

The key intended outcome of prohibiting credit card payments for online gambling is a reduction in gambling-related harms experienced by individuals, families, and communities across Australia. The use of credit cards for gambling constitutes a major risk factor for experiencing gambling-related harm. Therefore, removal of this risk factor by means of prohibition is likely to be successful in achieving the intended outcome of gambling harm minimisation.

However, it is important to consider possible unintended adverse consequences that could result from a ban, including:

Increased use of alternative consumer credit sources: It is possible that prohibiting the use of credit cards for online gambling may drive some consumers to alternative lending sources for gambling-related borrowing. Research should be commissioned to evaluate the impact of any regulatory changes in this regard. In 2011, a study found that 15% of participants accessed small amount credit contracts (SACCs) for gambling.<sup>14</sup> Some non-bank lenders, such as payday lenders and pawnbrokers, may have inadequate consumer protection safeguards in place, such as comprehensive credit history checks and risk assessments that consider potential gambling problems. Given the fees and interest rates charged by such lenders are typically very high, it is plausible that increased borrowing from these sources may exacerbate financial problems. Reports relating to the National Consumer Protection Framework for online wagering have noted that SACCs are typically targeted towards consumers who are financially vulnerable and may be unable to access mainstream credit due to poor credit ratings, unemployment, or gambling, and that this may further embed their financial disadvantage.<sup>15,16</sup> Prohibiting the use of credit cards for online gambling may impact the use of alternate credit sources, resulting in debt cycles for vulnerable populations. Preliminary findings by Swanton and Gainsbury suggest that individuals experiencing severe gambling problems may be most at risk, given higher rates of borrowing from payday lenders and pawnbrokers among this group (see Table 2).<sup>17</sup>

Reduction of harm-minimisation intervention opportunities: Some financial institutions have implemented harm-minimisation interventions specifically for gambling, including the ability to block credit cards for gambling purposes, limiting the extent of gambling on credit, and notifying customers of the costs associated with gambling on credit cards. There has been minimal evaluation demonstrating the uptake or impact of these measures. Nonetheless, interventions by financial institutions that are effective in achieving behavioural change may be a useful way to reduce gambling harms, and the opportunity for such interventions may be reduced if credit card payments were banned for online gambling. For example, if a customer is notified of how their gambling spend

<sup>14</sup> Banks, M., Marston, G., Russell, R., & Karger, H. (2015). 'In a perfect world it would be great if they didn't exist': How Australians experience payday loans. *International Journal of Social Welfare*, 24(1), 37–47. <https://doi.org/10.1111/ijsw.12083>

<sup>15</sup> Department of Social Services. (2017). *A national consumer protection framework for online wagering in Australia: Regulation impact statement for consultation* (DSS 2128.05.17). [http://ris.pmc.gov.au/sites/default/files/posts/2017/05/final\\_consultation\\_ris.pdf](http://ris.pmc.gov.au/sites/default/files/posts/2017/05/final_consultation_ris.pdf)

<sup>16</sup> Jenkinson, R., Khokhar, T., Tajin, R., Jatkar, U., & Deblaquiere, J. (2019). *National Consumer Protection Framework for Online Wagering: Baseline study*. Australian Gambling Research Centre, Australian Institute of Family Studies.

[https://www.dss.gov.au/sites/default/files/documents/11\\_2019/d19\\_887121\\_final\\_baseline\\_study\\_-\\_national\\_consumer.pdf](https://www.dss.gov.au/sites/default/files/documents/11_2019/d19_887121_final_baseline_study_-_national_consumer.pdf)

<sup>17</sup> Swanton, T. B., & Gainsbury, S. M. (2019). *Debt stress mediates the relationship between problem gambling and comorbid mental health problems* [Unpublished Honours thesis]. The University of Sydney.

compares to other spend categories, or receives a real-time notification suggesting they reduce their gambling spend, this may contribute to positive behavioural change. It is more difficult for financial institutions to limit spend through debit accounts or to track gambling spend made through third-party wallets.

Increased use of third-party payment mechanisms: One of the reasons it is possible to remove credit cards as a payment mechanism is the availability of many alternative online payment options. Many of these can be funded using credit cards, for example, by using a credit card to fund an e-wallet or to purchase pre-paid debit/gift cards. It is likely difficult for credit card providers to prevent individuals funding e-wallets and for gambling operators to know whether e-wallets are funded with credit cards. Thus, the ban on credit cards may be ineffective if there are simple workarounds, minimising the potential benefits.

Significant negative impacts on revenue for industry operators: The responsible provision of online wagering products by licensed operators is a legitimate business activity under Australian law. Implementing a ban on the use of credit cards for online wagering may inevitably have negative impacts on revenue for licensed online wagering operators, which would have downstream effects on government revenue from taxation and levies on the sale of gambling products. This impact may be eased by provision of a transition period prior to any regulatory changes coming into effect.

Increased use of illegal offshore wagering websites: Prohibiting licensed Australian online wagering operators from accepting credit card payments for gambling transactions could potentially lead some consumers to shift towards greater use of unregulated offshore wagering sites which may accept credit card payments. For this reason, it is important that the Australian Communications and Media Authority continues to work with Internet service providers to block access to illegal offshore gambling websites under the Interactive Gambling Act.<sup>18</sup> There is no existing evidence to indicate that credit card use differentiates between Australians who gamble on domestically licensed versus offshore gambling sites. In an Australian study conducted in 2012, offshore gambling site users were more likely to use debit cards and e-wallets (e.g., Moneybookers, Neteller, Poli) than domestic gambling site users, who were more likely to use direct bank transfers and BPAY.<sup>19</sup> However, it is highly likely that payment method usage patterns have changed since this research was conducted. We recommend that research be commissioned to investigate the role of payment methods in the use of offshore gambling sites.

## **Conclusion**

The available evidence indicates that banning the use of credit cards for gambling is the most prudent and appropriate course of action from a consumer protection perspective. Although the ability to use credit cards for gambling may have some associated benefits, these appear to be outweighed by the associated risks, especially for individuals experiencing severe gambling problems. However, we recommend that further research be undertaken to understand how consumers are using different payment methods for online gambling sites and to evaluate the impact of any ban, particularly with the aim of detecting unintended negative consequences and driving further efforts to reduce gambling harms.

## **Contributing authors**

[Associate Professor Sally Gainsbury](#) is Director of the Gambling Treatment and Research Clinic, and Founder and Leader of the Technology Addiction Team at the University of Sydney. Her research focuses on the impact of technology on gambling and behavioural addictions, including understanding the use of technology to minimise harms. She has authored more than 118 peer-review publications

<sup>18</sup> Australian Communications and Media Authority. (2019). *ACMA to begin blocking illegal offshore gambling websites*. <https://www.acma.gov.au/articles/2019-11/acma-begin-blocking-illegal-offshore-gambling-websites>

<sup>19</sup> Gainsbury, S. M., Russell, A. M. T., Hing, N., & Blaszczynski, A. (2018). Consumer engagement with and perceptions of offshore online gambling sites. *New Media & Society*, 20(8), 2990–3010. <https://doi.org/10.1177/1461444817738783>



which have been cited ~6,000 times. She has led and worked with numerous university and consulting teams and policy makers to design and evaluate harm-minimisation policies for gambling, including technology-based systems. She is a highly experienced and respected researcher in the gambling field and serves on many policy advisory boards internationally, for example, she is currently a member of the GambleAware Independent Research Oversight Panel, the National Council on Problem Gambling (NCPG) International Advisory Panel (Singapore), and the Liquor and Gaming NSW Gaming Technology Working Group. A/Prof Gainsbury has won numerous awards and fellowships in recognition of her research excellence and its impact for the community, including being named the 2019 NSW Tall Poppy of the Year by the Australian Institute of Policy and Science.

[Thomas Swanton](#) is a PhD candidate at the Gambling Treatment and Research Clinic in the School of Psychology at the University of Sydney. His PhD research investigates the impact of cashless payment methods on gambling behaviour. Tom was awarded a PhD scholarship through the NSW Government's Gambling Research Capacity Grants program, funded by the NSW Responsible Gambling Fund, and supported by the NSW Office of Responsible Gambling.

### ***Research and collaborative work currently underway relevant to this submission***

Our research takes place within the [Gambling Treatment and Research Clinic](#), the only university-affiliated gambling treatment service in Australia, and the [Technology Addiction Team](#), a multi-disciplinary team in the Brain and Mind Centre at the University of Sydney. The Technology Addiction Team brings together expert researchers from psychology, psychiatry, economics, public health, law and ethics, criminology, and business to focus on the role of technology in behavioural addictions and harm minimisation.

One of the Technology Addiction Team's strategic priorities is to investigate the future of digital payments in gambling, including potential harm minimisation interventions that could be implemented at the point of payment, or by using transaction data. The team are actively engaging with policy makers, industry operators, and financial institutions to further this research. Our team has active collaborations with two international teams conducting leading research in the area of digital payments for gambling: the Payments Research Collaborative based at the International Gaming Institute at the University of Nevada Las Vegas (USA), and the Personal Finance Research Centre based at the University of Bristol (UK).

Current projects include:

- Understanding how consumers view digital gambling payments in venues in comparison to cash, the implications of cashless payments for gambling harms, and strategies which could reduce the potential negative consequences and increase harm-minimisation contributions of cashless payment systems;
- Evaluating the impact of the ban on credit card payments for online gambling in the UK in terms of risky gambling among online gambling consumers.

## Appendix

**Table 1.** Use of credit cards to make deposits by problem gambling severity among a sample of 564 customers of Australian online wagering operators.<sup>20</sup>

Source of credit used	Non-problem gambling (%) (n = 127)	Low-risk gambling (%) (n = 129)	Moderate risk gambling (%) (n = 148)	Problem gambling (%) (n = 61)	Overall (n = 465)
Credit cards	23.6	40.3	41.9	44.3	36.8

Note. Problem Gambling Severity Index (PGSI) scoring as follows: non-problem gambling = score of 0; low-risk gambling = score of 1 or 2; moderate risk gambling = score of 3-7; problem gambling = score of 8-27.<sup>21</sup>

**Table 2.** Use of consumer credit products and loans to access money for any purpose by problem gambling severity among a sample of 309 Australian past-month gamblers.<sup>22</sup>

Source of credit or loan used	Non-problem gambling (%) (n = 82)	Low-risk gambling (%) (n = 73)	Moderate risk gambling (%) (n = 83)	Problem gambling (%) (n = 71)
Credit cards	43.9	41.1	32.5	56.3
Personal loans	7.3	1.4	4.8	29.6
Overdrawing a bank account	3.7	6.8	6.0	40.8
Pawnbrokers or pawn shops	0.0	0.0	1.2	19.7
Payday loans	0.0	4.1	3.6	22.5
'Buy now, pay later' services	11.0	9.6	14.5	26.8
'Rent to buy' deals, interest-free deals, or consumer leases	1.2	2.7	1.2	5.6
Online peer-to-peer or 'marketplace' loans	0.0	0.0	2.4	7.0
Borrowing money from friends and/or family	6.1	5.5	9.6	54.9
Pay advance from employer	0.0	0.0	0.0	14.1
Advance payment from Centrelink	0.0	2.7	6.0	14.1
Other	1.2	1.4	2.4	11.3

Note. PGSI scoring as follows: non-problem gambling = score of 0; low-risk gambling = score of 1 or 2; moderate risk gambling = score of 3-7; problem gambling = score of 8-27.

<sup>20</sup> Gainsbury, S. M., Procter, L., & Blaszczynski, A. (2018). *Survey of customers of Australian online wagering operators* [Unpublished Honours thesis]. The University of Sydney.

<sup>21</sup> Ferris, J., & Wynne, H. (2001). *The Canadian problem gambling index: Final report*. Canadian Consortium for Gambling Research. Retrieved from

[https://www.greco.ca/Modules/EvidenceCentre/files/Ferris%20et%20al\(2001\)The\\_Canadian\\_Problem\\_Gambling\\_Index.pdf](https://www.greco.ca/Modules/EvidenceCentre/files/Ferris%20et%20al(2001)The_Canadian_Problem_Gambling_Index.pdf)

<sup>22</sup> Swanton, T. B., & Gainsbury, S. M. (2019). *Debt stress mediates the relationship between problem gambling and comorbid mental health problems* [Unpublished Honours thesis]. The University of Sydney.



*Table 3.* Extent to which a sample of Australian past-month gamblers viewed their use of consumer credit products and loans to be related to their gambling activity.<sup>23</sup>

Source of credit or loan used in past 12 months	<i>n</i>	Not related (%)	Slightly related (%)	Moderately related (%)	Strongly related (%)	Totally related (%)
Credit cards	133	48.9	18.8	10.5	12.8	9.0
Personal loans	32	31.3	18.8	12.5	18.8	18.8
Overdrawing a bank account	42	16.7	16.7	11.9	23.8	31.0
Pawnbrokers or pawn shops	15	6.7	6.7	0.0	46.7	40.0
Payday loans	22	18.2	4.5	9.1	18.2	50.0
'Buy now, pay later' services	47	76.6	10.6	2.1	6.4	4.3
Borrowing money from friends and/or family	56	26.8	8.9	16.1	14.3	33.9
Advance payment from Centrelink	17	23.5	17.6	17.6	11.8	29.4

*Note.* The following categories were not included in this table because 10 or fewer respondents reported use of the respective source of credit or loan: 'rent to buy' deals, interest-free deals or consumer loans; online peer-to-peer or 'marketplace' loans'; pay advance from employer.

*Table 4.* Preliminary findings on the relationship between credit card use and PGSI scores among a sample of Australian past-month gamblers.<sup>24</sup>

Sub-sample	<i>n</i>	Non-problem gambling (%)	Low-risk gambling (%)	Moderate risk gambling (%)	Problem gambling (%)
Past-year credit card use to access money for any purpose	133	27.1	22.5	20.3	30.3
Past-year credit card use related to gambling	68	11.8	14.7	19.1	54.4
Past-year inability to make minimum required credit card repayment by the due date	38	5.3	2.6	13.2	78.9

*Note.* PGSI scoring as follows: non-problem gambling = score of 0; low-risk gambling = score of 1 or 2; moderate risk gambling = score of 3-7; problem gambling = score of 8-27.

<sup>23</sup> Swanton, T. B., & Gainsbury, S. M. (2019). *Debt stress mediates the relationship between problem gambling and comorbid mental health problems* [Unpublished Honours thesis]. The University of Sydney.

<sup>24</sup> Swanton, T. B., & Gainsbury, S. M. (2019). *Debt stress mediates the relationship between problem gambling and comorbid mental health problems* [Unpublished Honours thesis]. The University of Sydney.

*Table 5. Past-year experience of debt problems by problem gambling severity among a sample of 309 Australian past-month gamblers.<sup>25</sup>*

Source of debt problem	Non-problem gambling (%) (n = 82)	Low-risk gambling (%) (n = 73)	Moderate risk gambling (%) (n = 83)	Problem gambling (%) (n = 71)
Credit cards	2.4	1.4	6.0	42.3
Personal loans	1.2	2.7	1.2	19.7
After overdrawing a bank account	1.2	2.7	2.4	22.5
After borrowing money from a pawnbroker or pawn shop	0.0	0.0	1.2	12.7
Rent payments	0.0	2.7	3.6	25.4
Mortgage repayments	3.7	1.4	1.2	7.0
Utility bills	3.7	5.5	8.4	39.4
Professional service fees	2.4	0.0	2.4	18.3
Child support and maintenance payments	0.0	0.0	0.0	2.8
Court-imposed penalties and/or fines	0.0	0.0	0.0	14.1
Government debts	0.0	0.0	2.4	15.5
Payday loans	0.0	0.0	0.0	14.1
Money owed through 'rent to buy' deals, interest-free deals, or consumer leases	0.0	0.0	1.2	5.6
Online peer-to-peer or 'marketplace' loans	0.0	0.0	0.0	1.4
Money owed to friends and/or family	1.2	1.4	4.8	38.0
Other	0.0	1.4	0.0	5.6

*Note.* Debt problems were defined as having been unable to make the minimum required payment by the due date in the past 12 months. PGSI scoring as follows: non-problem gambling = score of 0; low-risk gambling = score of 1 or 2; moderate risk gambling = score of 3-7; problem gambling = score of 8-27.

<sup>25</sup> Swanton, T. B., & Gainsbury, S. M. (2019). *Debt stress mediates the relationship between problem gambling and comorbid mental health problems* [Unpublished Honours thesis]. The University of Sydney.