

NORTHERN TERRITORY RACING AND WAGERING COMMISSION

DECISION NOTICE AND REASONS FOR DECISION

MATTER: Gambling Dispute for determination by the Northern Territory Racing and Wagering Commission pursuant to section 224 of the *Racing and Wagering Act 2024*

COMPLAINANT: Mr N

LICENSEE: Hillside (Australia New Media) Pty Ltd trading as bet365

HEARD BEFORE: Mr Alastair Shields (Presiding Member)
(on papers) Ms Cindy Bravos
Ms Susan Kirkman

DATE OF DECISION: 19 March 2026

DECISION

1. For the reasons set out below, the Northern Territory Racing and Wagering Commission (**the Commission**) is satisfied that Hillside (Australia New Media) Pty Ltd trading as bet365 (**bet365**) was entitled to reverse the credit of \$53,585.20 made in error to the Complainant's wagering account in accordance with its terms and conditions.
2. The complaint is not upheld.

REASONS

Background

3. Bet365 was originally granted a sports bookmaker licence by the former Northern Territory Racing Commission under the licensing regime contained within the now repealed *Racing and Betting Act 1983 (the RBA)*. Under the transitional arrangements contained within the *Racing and Wagering Act 2024 (the RWA)*, which commenced on 1 July 2024, any licence issued under the RBA that was valid immediately before the commencement of the RWA continues in effect on the commencement of the RWA as a licence under the RWA. Bet365's licence was renewed by the Commission in 2025 and is due to expire on 30 June 2030.
4. As noted in quite a number of previous decisions, all sports bookmakers licensed by the Commission are required to promulgate a comprehensive set of terms and conditions for wagering which both parties are bound by when an account is opened and each time a wager is struck. These terms and conditions operate to ensure legislative compliance and the commercial efficacy of the business model of a sports bookmaker.

The Complaint and Investigation

5. On 16 June 2025, the Complainant lodged a complaint with the Commission in relation to his dealings with bet365 pursuant to section 221(2) of the RWA.

6. In the complaint, the Complainant stated that he had made a wager on 28 May 2025 that was originally settled as a win by bet365 in the amount of \$53,585.20 but was later reversed by bet365 without any notice to him.
7. The Complainant further stated that bet365 advised him that there had been a “*technical error*” and had offered him \$400 in bonus bets. The Complainant is seeking \$50,000 in compensation for bet365’s mistake, as a “*fair settlement of the loss of winnings and the platform’s admitted mistake*”.
8. Following the lodgement of the complaint and review of the materials provided, the Director of Racing and Wagering (**Director**) determined to investigate the complaint on behalf of the Commission pursuant to section 222(1) of the RWA and assigned the matter to an inspector.
9. The Director’s investigation affords each party the opportunity to submit relevant evidence in relation to the matter, and where required, for the parties to provide evidence at the request of the inspector.
10. At the completion of the investigation, the Director must prepare a report on the investigation and submit it to the Commission in accordance with section 223 of the RWA. Section 223(2) provides that the investigation report must contain:
 - a) a summary of the findings of the investigation;
 - b) any submissions provided by the parties to the complaint;
 - c) any relevant evidence obtained during the investigation; and
 - d) any recommendations that the Director may have in relation to the complaint.

Bet365 Response to the Complaint

11. In response to the complaint, bet365 advised that the Complainant placed a single seven-fold multi bet (made up of six same-game multis and one standalone selection) for a stake of \$20 on 28 May 2025, and that due to a system error, the wager was incorrectly settled as though \$20 had been placed on all of the 1,716 possible combinations of seven legs from the 13 selections, resulting in an incorrect payout of \$53,585.20. Bet365 stated that the total stake for such a wager had it been placed would have been \$34,320.
12. Bet365 stated that when bet365 became aware of the error, the wager was correctly resulted as a losing wager, and the winnings were removed from the Complainant’s wagering account. Bet365 stated that it was entitled to take these actions because their terms and conditions allow them to correct such errors.
13. Bet365 additionally stated that their initial offer of \$400 in bonus bets was a goodwill gesture, and that it was subsequently amended to an offer of \$400 withdrawable in cash in order to try and resolve the complaint.

Commission Findings and Consideration of the Issues

14. Section 224 of the RWA sets out the actions available to the Commission following receipt of a report from the Director in accordance with section 223 of the RWA.
15. The Commission has considered the investigation report provided by the Director, including the evidence provided by the parties and obtained by the inspector.

16. It is not in dispute that the Complainant placed a multi bet on US Baseball games for a stake of \$20 on 28 May 2025. The table below sets out each of the 13 selections in the multi bet, and the relevant odds and results:

Market	Selection	Odds	Result
The Athletics v Houston Astros	Under 8.0 Total Runs	\$1.95	Lose
Toronto Blue Jays v Texas Rangers	Over 7.5 Total Runs	\$1.83	Lose
Toronto Blue Jays v Texas Rangers	Texas Rangers to Win	\$1.71	Win
New York Yankees v Los Angeles Angels	Over 8.5 Total Runs	\$1.86	Lose
New York Yankees v Los Angeles Angels	New York Yankees to Win	\$1.45	Win
Colorado Rockies v Chicago Cubs	Over 7.0 Total Runs	\$1.83	Push
Colorado Rockies v Chicago Cubs	Chicago Cubs to Win	\$1.31	Win
Pittsburgh Pirates v Arizona Diamondbacks	Arizona Diamondbacks to Win	\$1.35	Win
Pittsburgh Pirates v Arizona Diamondbacks	Over 8.5 Total Runs	\$1.83	Win
Washington Nationals v Seattle Mariners	Seattle Mariners to Win	\$1.60	Win
Washington Nationals v Seattle Mariners	Over 8.5 Total Runs	\$1.95	Win
Miami Marlins v San Diego Padres	Over 8.0 Total Runs	\$1.90	Win
Miami Marlins v San Diego Padres	San Diego Padres to Win	\$1.62	Win

17. Bet365 has argued that the wager was a single multi bet made up of seven legs for a stake of \$20 and that the wager was unsuccessful because three of the legs were identified as losing. The bet slip submitted by the Complainant when lodging the complaint records the wager as “\$20.00 Seven-Folds”, which is consistent with bet365’s account of the wager placed and constitutes the customer-facing confirmation of the wager at the time of placement.
18. The Complainant does not dispute the description of the wager recorded on the bet slip. Rather, the Complainant relies on the fact that the wager was originally settled in his favour and seeks to retain the winnings paid as a result of that settlement, notwithstanding that bet365 has since identified the payout as arising from a system error.
19. As part of the assessment of this complaint, consideration has been given to the approved wagering control system that bet365 is required to maintain in accordance with section 163 of the RWA. That system establishes an independent audit log of all wagering transactions carried out by bet365. The audit log is a tamper-proof chronological record that captures how wagers are processed within the bet365’s backend systems, including who placed the wager, when the wager was placed, what the wager was placed on, and the stakes and the relevant odds. The audit log also records any changes to the wager (for example voiding or cashing-out of the wager), and the subsequent result and payout calculation, and how the wager was settled.
20. The audit log provides reliable evidence of how a wager was processed within bet365’s system. Where a divergence arises between backend execution and the customer facing confirmation, the audit log reflects the systems processing outcome, while determination of the wager type agreed at time of placement also requires consideration of the customer-facing bet slip and confirmation.
21. In this case, the independent audit log record for this wager details that the Complainant’s \$20 stake was applied across all 1,716 possible combinations of the Complainant’s selections, reflecting that the backend system processed the wager as a combinations wager rather than a single seven-fold multi wager. This processing outcome is inconsistent with the customer facing bet slip, which records the wager as a single \$20 seven-fold.

22. Bet365 has submitted that the minimum allowable stake per combination is \$0.20, and that it would therefore not have been possible for the Complainant to have validly placed a wager across 1,716 combinations with a stake of \$20.
23. For completeness, notionally dividing the \$20 stake recorded in the audit log across 1,716 combinations would result in a stake of around \$0.01165 for each combination, which is below the minimum allowable stake by bet365 and reinforces that the audit log reflects a system processing error rather than a valid wager. The manner in which the wager was processed is also consistent with the incorrect settlement that subsequently occurred.
24. Given that the wager was initially settled as a winning wager in the sum of \$53,585.20, it is necessary to consider bet365's actions to reverse the credit in the Complainant's account when bet365 became aware that the settlement had resulted from a system error.
25. In this regard, the Commission has identified the following bet365 terms and conditions as germane to the consideration of this complaint:

"D. BETTING PROCEDURES ...

4. Settlement and Payouts ...

4.5 Winnings from settled bets/wagers are added to the balance of your betting account. Any funds/winnings credited to an account in error are not available for use, and bet365 reserves the right to void any transactions involving such funds and/or withdraw the relevant amount from your account and/or reverse the transaction, either at the time or retrospectively.

E. USE OF THE WEBSITE ...

6. Errors

6.1 bet365 will not be liable for any errors in respect of bets or wagers including where: (i) bet365 has incorrectly stated the relevant odds/spreads/handicap/totals/Cash Out/Edit Bet amount; (i) bet365 continues to accept bets or wagers on closed or suspended markets; or (i) bet365 incorrectly calculates or pays a settlement amount, including where a bet is Cashed Out for the full settlement amount; or a bet is made void incorrectly, where 'Void if player does not start' was selected at bet placement."

26. The Commission is satisfied that there was a clear technical error by bet365 in the initial calculation and settlement of the wager, and that bet365 is therefore entitled to correct the error in accordance with the terms and conditions outlined above.
27. As a matter of procedural fairness to bet365 and the Complainant, a draft of the Commission's determinations was supplied to both parties for comment. Comments received from the Complainant and bet365 were duly considered in the finalisation of this Decision Notice.

Conclusion and Determination

28. The Commission is satisfied that the Complainant placed a single seven-fold multi bet for a stake of \$20 on 28 May 2025. The customer-facing bet slip records the wagers as "\$20 Seven-Folds" and the Complainant does not dispute that description. There is no evidence that the Complainant selected or was offered a combinations wager at the time of placement.

29. Based on the results of the relevant selections, three legs of the seven-fold multi bet were losing selections. Had the wager been processed and settled in accordance with its agreed structure, the wager was unsuccessful.
30. The independent audit log records that the backend system processed the wager as though the \$20 stake had been applied across all 1,716 possible combinations arising from the Complainant's selections. The Commission accepts the audit log as a reliable record of system processing.
31. However, where a divergence arises between backend processing and the customer-facing bet slip, the audit log evidences system behaviour rather than of itself, conclusively establishing the wager type agreed at the time of placement. The customer-facing bet slip remains the primary evidence of the wager agreed between the parties.
32. Bet365 has submitted, and the Commission accepts, that the minimum allowable stake per combination is \$0.20. Notionally dividing the \$20 stake across 1,716 combinations would result in a stake of approximately \$0.01165 per combination, which would not constitute a wager allowable by bet365. This supports the conclusion that the backend processing reflected a system error rather than a combinations wager capable of being placed by the Complainant.
33. The Commission is satisfied that the incorrect backend processing directly resulted in the erroneous settlement of \$53,585.20, which did not reflect the wager agreed by the parties.
34. It is not in dispute that bet365 initially credited the Complainant's account with the erroneous settlement and later reversed the credit once the system error was identified.
35. Bet365's terms and conditions expressly permit the correction of settlement errors and the retrospective reversal of funds credited in error. These provisions do not require advance notice to be given prior to corrections.
36. Accordingly, the Commission has determined that bet365 acted in accordance with its terms and conditions in reversing the erroneous settlement and has not acted in breach of the Act.
37. The complaint is not upheld.

NOTICE OF RIGHTS

38. Section 239(1)(g) of the RWA sets out when a decision or action by the Commission taken pursuant to section 224 of the RWA is reviewable by the Northern Territory Civil and Administrative Tribunal (**NTCAT**).
39. In this case, because the disputed winnings from the wager placed by the Complainant are larger than the amount of \$20,000 prescribed by the *Racing and Wagering Regulations 2024* (Regulations), the Complainant and bet365 may make an application to NTCAT for a review of this decision within 14 days of receipt of this Decision Notice.



Alastair Shields
Chair, Northern Territory Racing and Wagering Commission

On behalf of Commissioners Shields, Bravos and Kirkman