



Ministerie van Veiligheid en Justitie

Advice on the framework for the prevention of problem gambling and addiction

Final report

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ASSISSA

Index

1. INTRODUCTION	4
Background.....	4
Background to the assignment.....	4
Structure of the advice	4
Utilising the advice	5
2. THE STEPPED CARE MODEL.....	6
Introduction	6
Proposed in law	6
Academic view on the topic.....	6
Stakeholders' views on the topic	6
Conclusions and recommendations	7
3. INFORMATION PROVISION	11
Introduction	11
Proposed in law	11
Academic view on topic.....	11
Stakeholders view on topic.....	13
Conclusions and recommendations	14
4. CATALOGUING PLAYER BEHAVIOUR	18
Introduction	18
Proposed in law	18
Academic view on topic.....	18
Stakeholders view on topic.....	22
Conclusions and recommendations	23
5. INTERVENTION WHEN SIGNALS OF RISKY PLAYING BEHAVIOUR ARISE	26
Introduction	26
Proposed in law	26
Academic view on topic.....	26
Stakeholders view on topic.....	29
Conclusions and recommendations	30
6. GUIDANCE TO PROFESSIONAL CARE.....	32
Introduction	32
Proposed in law	32
Academic view on topic.....	32
Stakeholders view on topic.....	34
Conclusions and recommendations	34

7. TRAINING REQUIREMENTS FOR STAFF MEMBERS	37
Introduction	37
Proposed in law	37
Academic view on topic.....	37
Stakeholders view on topic.....	38
Conclusions and recommendations	38
8. PROMOTIONAL ACTIVITIES AND INFORMATION PROVISION TOWARDS PLAYERS	41
Introduction	41
Proposed in law	41
Academic view on topic.....	41
Stakeholders view on topic.....	43
Conclusions and recommendations	43
9. TOWARDS A QUALITY SYSTEM FOR SOCIALLY RESPONSIBLE GAMING.	45
Introduction	45
Proposed in law	45
Academic view on topic.....	45
Stakeholders view on topic.....	46
Conclusions and recommendations	47
10. CONCLUSIONS	49
General conclusions.....	49
Support from the sector.....	49
The Dutch framework compared to other jurisdictions.....	50
Next steps.....	51
Appendix 1: Explanation of the evidence base	52
Appendix 2: A Possible Risk Assessment Protocol	54
Appendix 3: Participants list	58
Appendix 4: Bibliography.....	59

1. INTRODUCTION

Background

The market for remote gambling in the Netherlands will be regulated by 2015. The draft bill is currently in consultation. Once the remote games of chance are regulated, licensees will have to meet several requirements. Remote gambling comes with particular risks, especially in the field of problem gambling and addiction. This bill therefore creates a framework to identify problem gambling in a timely manner and take concrete steps to prevent harm. The purpose of harm prevention is:

- To prevent vulnerable groups (such as youth) getting into problems by participating in remote games of chance;
- The early detection of risks and potential gambling problems;
- Encouraging moderation in gambling and if necessary referring players to appropriate care.

The starting point is the concept of 'responsible gaming', where government, licensees and players each have their own responsibility. The framework for the policy on gambling harm prevention is drafted in the bill. The Modernization Programme faces the challenge to further shape this framework. The actual implementation of the prevention policy of providers is very important for success in the targets for the prevention of problem gambling. Therefore the Programme aims for regulation that is workable and fits within the business models that are common for operators in the sector.

Background to the assignment

The Ministry of Security and Justice (MoSJ) asked Pieter Remmers and Malcolm Bruce, acknowledged experts in the field of responsible gaming, to help develop an evidence-based policy document to enable the creation of a suitable regulatory framework to protect players under the new regime in 2015.

The team met regularly over a 5-month period to plan the different components of the process and to review findings. The consultants acted as subject matter experts and the conduit to the academic reviewers.

The consultants prepared a series of validation seminars with relevant stakeholders from industry and the treatment and prevention sector. Each seminar addressed all the specific topics covered in this paper. Preparatory papers were sent to participants to stimulate discussion and address pertinent questions. Feedback from the seminars was also used to inform this paper. In parallel to this Pieter Remmers and Malcolm Bruce submitted advice papers to the Ministry on each topic.

Structure of the advice

This paper is a consolidated document containing all the advice gleaned throughout the various stages of the process. It contains the most up to date peer-reviewed scientific research and best practice in international regulations. Specific components of the advice included reviews of:

- Relevant legislation from other jurisdictions

- Emerging best practice
- The extensive experience of the consultants
- A literature review of relevant published and peer reviewed studies
- The views of leading researchers who have investigated these topics
- The views of stakeholders gleaned from the workshops

Three validation workshops with relevant stakeholders were held over a five-month period, during which the elaboration of the building blocks was tested and made more concrete. Commitment from the stakeholders to the elaboration and review technical issues as well as the business and commercial considerations of the stakeholders were the objectives of these workshops. To guide the discussions at the workshops a number of topics were presented.

The first workshop focussed on:

- Registration of the player
- Addictive features of the offered games
- Monitoring and analysis of playing behaviour
- Intervention when signals of risky playing behaviour arise

The second workshop focussed on:

- Guidance to professional care
- Training requirements for staff members
- Promotional activities and information provision towards players

The third workshop focussed on:

- Best practices in the industry
- Reviewing any difficulties perceived by stakeholders
- Achieving support for the emerging strategy

Utilising the advice

This document is ultimately the result of close cooperation of the consultants with the policy team of the Ministry of Security and Justice and with stakeholders and academic researchers. Taking the proposed bill as a starting point, this document contains insights and recommendations for a suitable regulatory framework. This document will therefore be used as input for designing the lower regulation.

To support the policy decision making, each topic in this document is concluded with specific advice and recommendations from the consultants, on how to create a suitable regulatory framework to identify problem gambling in a timely manner and to take concrete steps to prevent harm and to protect players. Where possible, a workable and sensible manner of further shaping this framework is presented.

2. THE STEPPED CARE MODEL

Introduction

Players differ from one another, as each player plays in a different manner and is to a different degree susceptible to harm. This means, ideally, for every player the right approach to the prevention of harm needs to be chosen. One way to adhere to that principle is to use a 'stepped care' model of harm prevention.

Stepped care is a model of healthcare provision that has two essential features: (a) The recommended approach to the client should be the least restrictive one possible in terms of cost and inconvenience to the client but still likely to give significant benefits, and (b) It should be self-correcting, in that the results of interventions are monitored systematically and changes are made or stepped up if the current intervention proves not to be effective and achieves no benefits for the client.

Proposed in law

Article 4a of the current Betting and gaming Act

1. The holders of a license on the basis of this betting and gaming act should take all measures and services which are required to prevent addiction in the games they organize.

Academic view on the topic

Research outcomes

In the stepped care model, a hierarchy of potential interventions can be used, ranging from simple interventions (e.g., information provision), to mandatory exclusion, and recommended (light and more intensive telephone, online or face-to-face counselling / treatment / therapy. Guidelines and decision rules should be used to guide interventions. Collaboration with the client is important to achieve outcomes (Bower & Gilbody, 2005).

Points of attention for policy makers

In the stepped care model, the onus of responsibility rests with the operators as their staff must administer the stepped care programme to maximise positive player outcomes.

Stakeholders' views on the topic

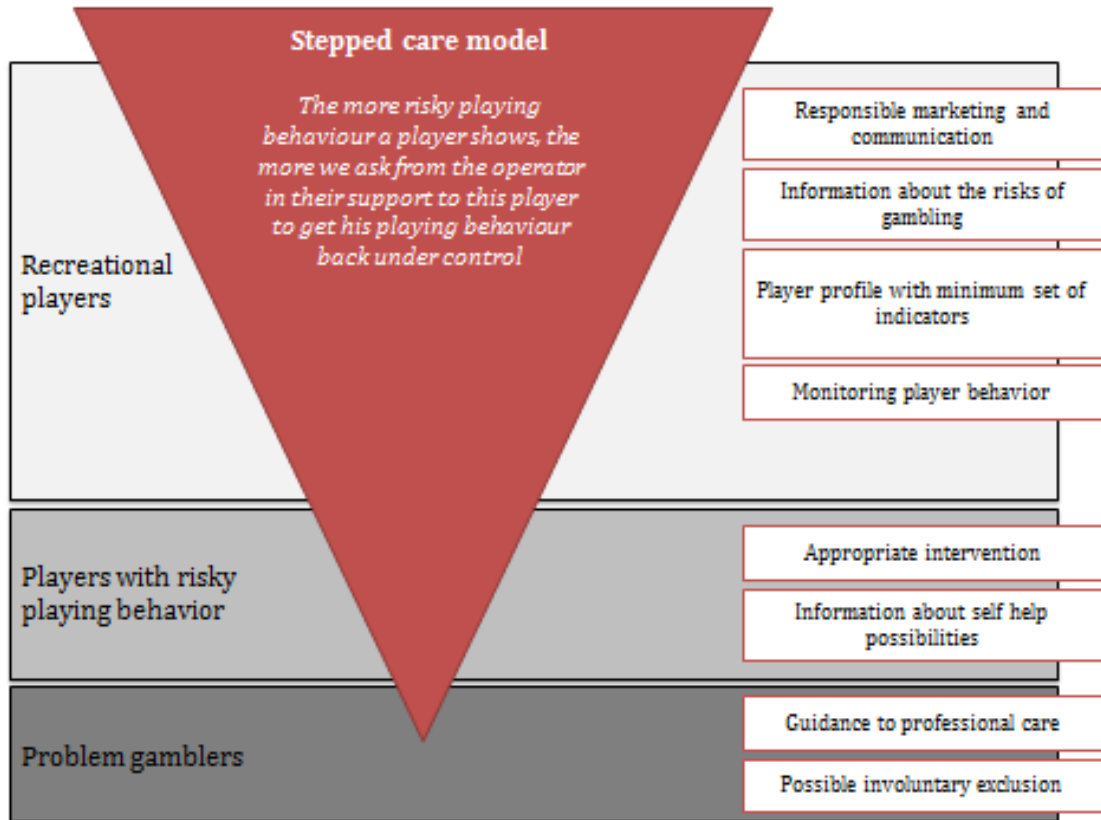
The general view from stakeholders is that the riskier or more problematic the playing behaviour, the more focused the intervention needs to be. Thus, there was a general agreement on the need for a stepped care model for the interventions as proposed by the ministry (see figure 1).

Operators agreed that in their responsible gaming policies they should describe their escalation procedure, which the gaming authority (the Ksa) can then test when providing a license. Furthermore, when in place, the procedures (especially online) can easily be audited.

It was agreed that developing good practice in this area would be through involving multiple stakeholders. The requirements should be mandatory for those players

getting into trouble and a stepped care approach for those at no or low risk would be appropriate. It was recognized that small operators might not be able to implement the same sophisticated systems as larger operators.

Figure 1: The stepped care model as discussed at the workshops



Conclusions and recommendations

Given how widely applied stepped care is in health and social welfare, it would be appropriate to use such a model to prevent harm in gambling. This means that operators should adopt a suitably recommended system, in which they distinguish recreational players from players with risky playing behaviour and problem gamblers. We recommend that such a system should be written down in guidelines and decision rules as part of an operator’s responsible gaming (RG) policy.

This means that responsible gaming policies should contain the adopted procedures to recognise, analyse and catalogue suspicious and risky playing behaviour. Furthermore, there should be a hierarchy of potential interventions, ranging from simple interventions (e.g., information provision), to possible mandatory exclusion in very exceptional cases, and recommended telephone, online or face-to-face counselling / treatment / therapy. Ultimately, the guidelines of the stepped care model should clearly define what the appropriate RG measures and interventions for each of the specific types of playing behaviour.

To further maximise positive client outcomes, staff will require training in the implementation and use of the model. Sufficient staff must be available to administer the stepped care model from the help desk or floor staff.

Minimum standards for online operators

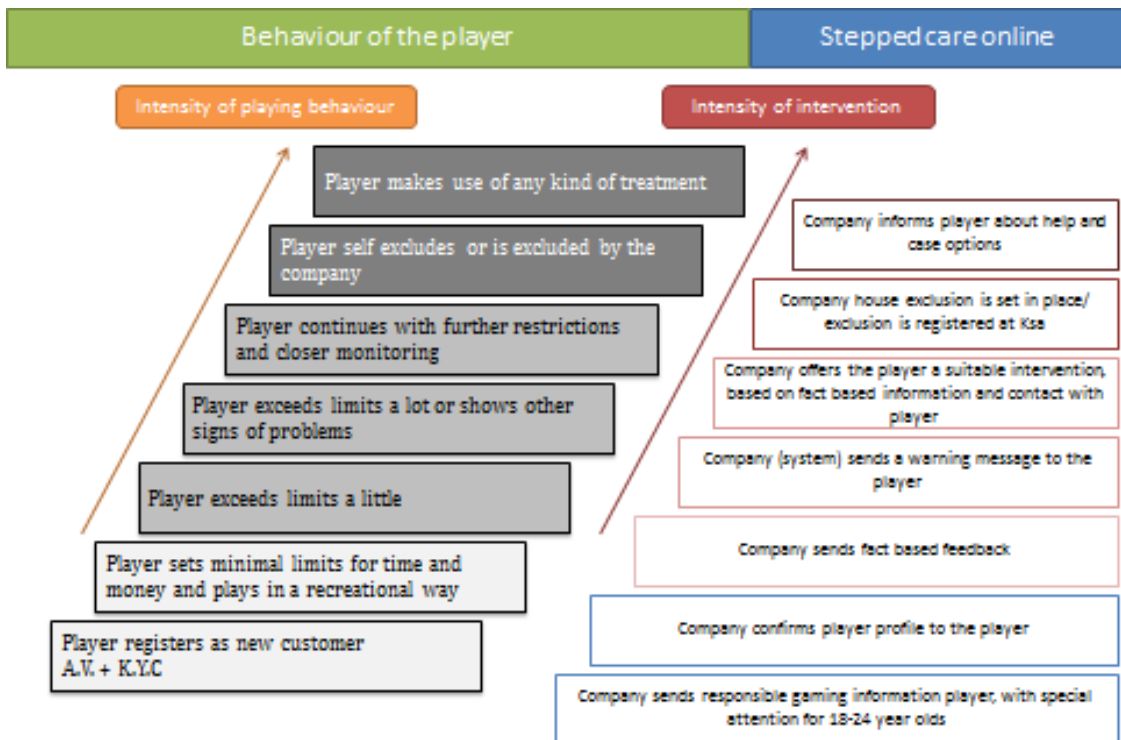
Operators must adopt a suitable monitoring system that allows the cataloguing of playing behaviour. Suspicious or risky playing behaviour should then be analysed to determine if the playing behaviour constitutes a risk or a problem for the player. This subject will be addressed more extensively in Chapter 4. We recommend that recreational players should be given information on responsible gaming. They should also be given information about their playing behaviour, e.g. amount of money on player account, play-activity reports or betting history, etc. This will be further elaborated in Chapter 3.

Players with risky playing behaviour should be given a suitably crafted ‘warning’ message when boundaries are about to be crossed or when playing limits are exceeded. They should also be given information about their risky playing behaviour, e.g. self-tests for problem gambling. Another appropriate measure could be to persuade the player who is at risk, to set limits.

Furthermore, we find it appropriate that the operator would refrain from (or at least be very cautious in) giving these players bonuses or otherwise applying direct marketing to these players.

When needed, problem gamblers should be guided to professional treatment and / or self-help/care, or should be persuaded to self-exclude from playing. In very exceptional cases, the player should be excluded involuntarily. Furthermore, the operator should refrain from giving these players bonuses or otherwise applying promotional activities and direct marketing on these players.

Figure 2: The stepped care model in an online environment



Minimum standards for land based operators

We recommend that land-based operators keep track of players and their behaviour by cataloguing or remembering manifested signs of risky behaviour or, or by recording the visiting frequency of players.

This is likely to be a challenge for operators in the arcade sector, who do not currently have staff dedicated to the application of such a system. The land-based casino sector has a system (OASIS) in place at present that can monitor player behaviour to a certain extent and can provide information on customer contacts.

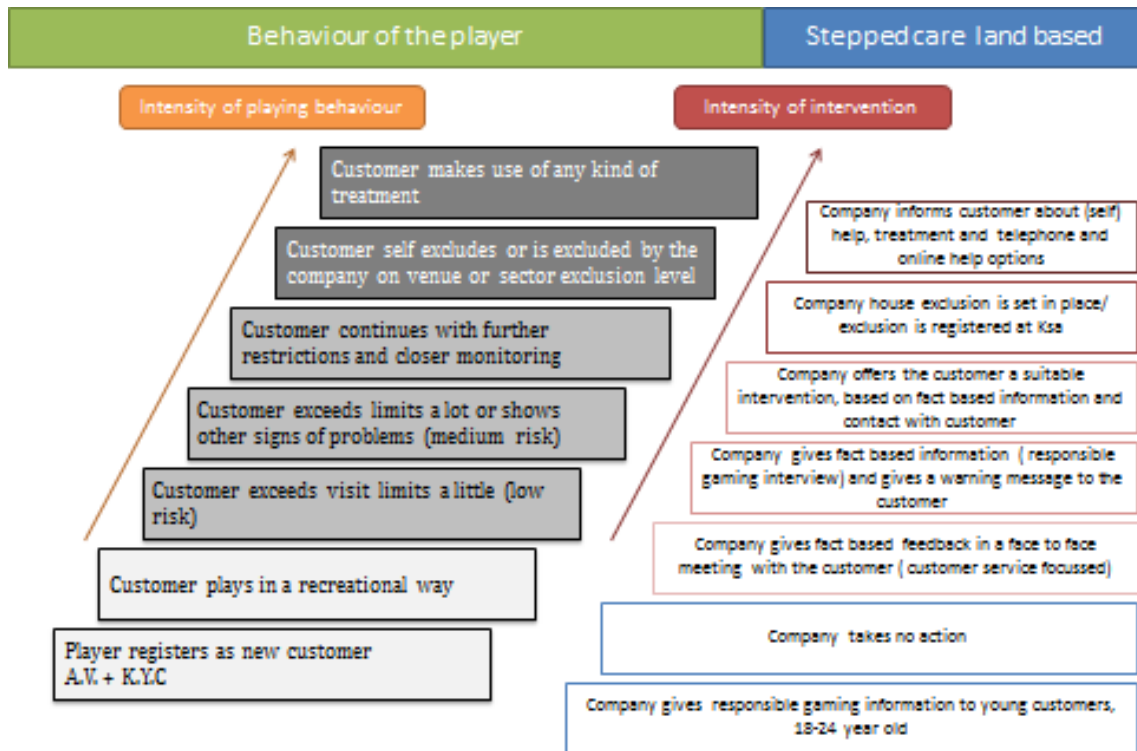
We further recommend that recreational players should be given general information on responsible gaming and the risks of gambling.

Players with risky playing behaviour should be given a warning in person when boundaries are crossed. They should also be given information about their risky playing behaviour, e.g. self-tests for problem gambling or providing a 'mirror' by way of feedback on their gaming behaviour.

Furthermore, operators should refrain from (or at least be very cautious in) applying direct marketing such as advertising and bonuses to these players.

Players exhibiting signs of problems should be guided to a professional and / or self-help organisations, or should be persuaded to self-exclude from playing. In exceptional cases, the player should be excluded involuntarily from gambling. Furthermore, operators should refrain from applying any promotional activities to these players.

Figure 3: The stepped care model in a land-based environment



Considerations about the appropriate level of detail

The stepped care model should be reviewed regularly under the umbrella of the Ksa or another independent body.

Advice on next steps

The model gives direction as to how to bridge the gap between help provided by the operator and help, or healthcare services provided by the counselling / treatment and prevention organisations. Some suggestions are: a) Someone from the counselling / treatment and prevention organisations to help internally for the operator; b) A ‘white label’ website as a starting point for RG related information and facilities.

Further research and agenda

Given their experience in other health welfare and addiction spheres, the counselling / treatment and prevention sector are well able to provide advice support and training to operators in the implementation of these systems. Our recommendation for the future agenda would be that counselling / treatment and prevention organisations and operators have a regular dialogue under the umbrella of a possible future Prevention Fund and the Ksa. This would enable their cooperation and help them to work together to ensure that the adopted RG policies like the stepped care model are current and effective.

3. INFORMATION PROVISION

Introduction

Informed consumer choice is now seen as a pre-requisite of good public health, however information must be accurate realistic and well presented. Recent revelations about sugar content in everyday food have wrong-footed the food industry and similar scandals are possible in gambling. It is vital that operators address the need to provide accurate information about true odds and the nature of chance and probability in order to educate players.

Very few operators have adequate information available. Those that do, have largely limited this to information to how to apply responsible gaming tools. There is much to do to equip operators to be able to meet the policy objective. The current land-based sector is mostly very well equipped and provides information about how to keep gambling in control, self-tests and information on help services (self-help and professional care).

Proposed in law

Article 4a of the current Betting and gaming Act

1. The holders of a license on the basis of this betting and gaming act should take all measures and services which are required to prevent addiction in the games they organise.

Academic view on topic

Research outcomes

The importance of influencing behaviour in public health has been widely established for a number of risky behaviours. Academics have looked at the best methods for influencing positive behaviour change through messaging and established the importance of peer-to-peer type messaging and normative feedback (Dolan et al., 2012). This has also been emphasised in the review on gaming limit setting (Lucar et al., 2012).

Unfortunately, those with gambling problems are often in denial of their problems and in spite of objectively having serious gambling-related problems do not think they have a problem at all (Derevensky, 2012; Haroon et al., 2003). Therefore it is vital that information about how to keep safe and how to get help are conveyed in ways that will encourage greater uptake. In this regard gaming has much to learn from other areas of health information dissemination and many successful techniques from other areas of public health could make their way into the gaming domain, with the help of counselling / treatment and prevention organisations. Marketing strategies are also important and should not be overlooked (Bernhard et al., 2012) to optimize adoption of such strategies.

The willingness of an operator to provide meaningful consumer protection information is an indication of a mature and confident organisation. This is particularly true for operators whose products have the potential to cause harm with certain customer segments. Visibility of information about how to play responsibly, the nature of games of chance and true odds are all-important in order for players to make an informed choice about their gambling (Blaszczynski et al., 2008). The willingness to carry a warning text in a readable font size is probably a good indication of such confidence

and could be a sign of corporate social responsibility and demonstrable awareness of responsibilities.

RG Information

The principle of encouraging players to make an informed choice / informed decision about whether and how to gamble has been well endorsed by researchers (Blaszczynski et al., 2004; Blaszczynski et al., 2008; Blaszczynski et al., 2011).

Direct evidence relating to online gambling is limited. There have been a number of evaluations efforts to educate EGM gamblers. Wohl and colleagues developed and evaluated the effectiveness of a short video that provided education on how slot machines work, the value of setting financial limits, and strategies to avoid problems (Wohl et al., 2010) They have recently made a shorter version and are currently evaluating its efficacy.

Tools to help players set limits

Tools such as expense calculators are generally confined to gaming help organisations (for example gambleaware.co.uk). Many of the lottery organisations and a limited amount of gaming operators have yet to incorporate these features on their websites. However the provision of such tools within an RG hub could be of benefit to those who wish to place a monetary limit on their play (Auer & Griffiths, 2012).

Provision of Information on losses and account balances

Regarding the idea of displaying limits on the player account page and onscreen during play, (Lucar et al., 2012) summarized the research to date on this topic: *In general, play activity reports can be expected to be well received by Internet gamblers, and can perhaps be a useful tool for Internet players to become more aware of the amount of money they are spending on their gaming. Seeing expenditure histories of online play may help prompt gamblers to set appropriate limits on their gaming; further research is required to evaluate if play activity reports actually result in changes in gaming behaviour and limit setting*

Player specific information regarding time

Schellinck and Schrans (2002) found that an on-screen clock was associated with improvements in keeping track of time and staying within desired time limits, but had no effect in actually reducing session length or expenditure. Research by Wynne and Stinchfield (2004) similarly found no effect on machine gaming behaviour. EGM gamblers in a Quebec study reported that having a clock was also not a helpful tool in promoting responsible gaming (Ladouceur & Sevigny, 2009).

In 2001 all gaming machines in the Crown casino in Melbourne, Australia were required to have clocks to display the time of day so that the players could be aware of the time of day and passage of time, however so far there is very little or no evidence on the effectiveness of the measure.

Player specific information derived from monitoring play

Gambling harm is the result of a complex relationship between the object of addiction (gaming technology), the player (demographic and lifestyle characteristics) and the environment, opportunities to gamble, stimulations to gamble, culture, etc. (Korn & Shaffer, 1999). A more common approach is to examine psycho-social-behavioural environmental factors associated with harm from gambling.

Much of the empirical work in this area has been done by Howard Shaffer and colleagues using online gamblers on Bwin data (Gray et al. 2012).

A number of developers claim to have found detectable behavioural markers or risky gambling behaviour or problem gambling, however evidence supporting these claims is so far limited. *BetBuddy*, *Featurespace* and *Playscan*, all designers and operators of behavioural tracking systems, suggest they have empirical evidence to support their use. However the vast majority of the data is unavailable due to reported proprietary business reasons. Most recent studies indicate that at least one variable is a reliable indicator –involvement in multiple different modes of gambling. Following the work of Shaffer and others with the Bwin data and further analyses of the same data by German researchers, multiple involvement is considered an important predictor of potential harm (Brosowski et al., 2012). Unfortunately, too many typical gamblers who are not at risk also engage in multiple forms of gambling in different venues rendering this variable limited in its effectiveness as a single predictor for problem gambling.

An Austrian designed system called *Mentor* is not a predictive tool and simply provides players with personalized information, statistics, and user-friendly graphics about their individual gaming behaviour. Furthermore, it provides personalized messages and action items. It also allows operators to monitor player behaviour.

Points of attention for policy makers

Research and anecdotal evidence from non-problem as well as problem gamblers suggests that information provided may not be used consistently. Most ordinary gamblers believe that responsible gaming information/messaging does not apply to them, as these are safeguards for problem gamblers.

Furthermore, awareness initiatives appear to have had a very limited impact if people are not explicitly asked to attend to the information or have no intrinsic interest in it. The challenge for gambling operators is to make educational information engaging and interesting for players.

Insight into the working of a game can prove useful in educating the player. Some attempt at explaining the true nature of house edge, odds and randomness is available on the website Gambleaware and a number of other sites including lottery operators.

Stakeholders view on topic

General information

It was agreed that tailor-made information is probably necessary according to different segments of the player population. A central point for general information would be wise, but the consensus was that operators should always provide information about the risks of playing games of chance on their websites.

It was also agreed that operators should make an effort in making the information attractive or more suited to a player, for example by using marketing instruments.

Operators suggested that they could use mechanisms for making information attractive for the player, such as those that are used for marketing goals (e.g. use professional poker players). In marketing it is also the challenge to make information as attractive as possible for the player. One suggestion is to use tutorials as a way to inform players, or to give information in a way that is visually stimulating.

Operators suggested that strategies for informing players can also benefit from good Customer Relations Management (CRM) techniques. For example, the information given to young adults should contain some extra content, e.g. more information on keeping healthy finances. Although information specially directed to young adults, should not be directed in such a way that they, because they have a certain age, get special attention.

Stakeholder views on explanations of house edge and characteristics of games

None of the operators appear to provide a full explanation of the true nature of gambling or explain the long-term nature of 'return to player'. There is no doubt that a full and uninhibited disclosure of these facts would enhance the education of players should they be willing to review this information and if adequately conveyed.

However, operators were of the view that information about the payback percentage (PP) is not always possible (e.g., regarding poker) and there are complexities in describing payback percentages in some environments (e.g., arcade gambling). PP may not be a good indicator for the player to know more about the characteristics of the game as it can create unrealistic expectations. PP figures are not generally meaningful for players and are unlikely to be understood by them from a consumer protection perspective. It may be more useful to have explanations of the true odds of winning on a particular game. The payback percentage is always an average and not a pattern or regularity for payback.

Conclusions and recommendations

Minimum standards for land based and online operators

Operators provide players with fair and adequate information to make informed choices. Players should be automatically given information about how to keep gambling fun, the nature of the gambling (odds, probabilities, etc.) and how / where to get help if problems arise. All operators should display such information, to a minimum standard, perhaps formulated by the Ksa, and presented prominently, on their websites or in their venues.

The responsible gaming information should cover possible problems and harmful effects of gambling, as well as tips and advice that can help the players enjoy gambling responsibly. Links to this page should be available through all available interfaces for products and at strategic points across the websites and venues. Player protection information for players must include the following:

- Responsible gaming information
- Guidance on 'self-assessment' processes
- Links to problem gambling services
- Self-limitation
- Self-exclusion
- Filtering programmes
- Complaint procedures
- Account Statements and gambling / betting histories

Considerations about the appropriate level of detail

Regardless of where the resources come from, this is how we see them being applied in the AMvB:

Preventative Education and Information

Operators should be committed to a) helping players receive information about risky play and how to avoid it, and b) helping players to evaluate their behaviour and to get help for themselves.

Operators should do this through the provision of educational information through their RG pages. This is an area that operators should review on an on-going basis. Operators should also promote educational programmes and other information initiatives aimed at the prevention of harm.

Player Protection Settings and Information Text on Player Protection Page

Operators should have a centralised player protection page on websites, or information point in venues, from which players can manage their settings across the product range. Here players can:

- Set self-exclusion for a specific period of time
- Set or edit deposit or loss limits settings for the account, or manage product specific limits
- Read information regarding the self-exclusion and limits functions, which should be clearly explained within the player protection settings page.

Customer Complaints

Players are notified of their right to complain and to contact the Ksa or an independent body during or after the complaint process.

There needs to be a helpdesk for players, so that they can ask for information or to make complaints. This should be available 24/7 in Dutch and there should be multiple ways to make contact (e.g. a chat function, e-mail, or telephone). The helpdesk needs to be able to provide specialist staff to undertake interventions. This helpdesk can be an independent organisation or can be related to the operator.

Age Verification and Underage Gambling

Operators should use strict and rigorous process for age verification takes players through multiple stages to confirm their identity and age. The process should consist of:

- Account opening – the customer has to provide registration details (name, address, date of birth, email address, phone number and card or bank details) to the operator. The customer also has to agree to the terms and conditions, including the section that outlines that you must be over the age of 18. All these standards are to be developed by the Ksa.
- Prevent funding from “at risk” methods (those deemed to be available to minors) – players funding with “at risk” payment methods are locked at the point of registration.
- Validating the customer – the operator confirms that the customer’s details provided actually relate to the user of the account, via one of a number of methods:
 - ❖ Verifying the details supplied during registration with a third party company. Selected customer details entered during account registration are verified.

- ❖ When necessary utilising third party relationships to certify customer documentation.
- ❖ Supplying hard-copy identity documentation. Should the above two solutions are not available, players should provide operators should with copies of documentation such as a copy of a passport, driving licence or utility bill.

The operators' sites and venues must clearly display an '18 or 18 +'s only' sign, clearly visible on entrance doors or web site pages. Through the registration process there should be a clear message regarding underage play and the steps the operators takes to check on age. This acts as a deterrent to minors.

I. Customer account

Operators should not allow players to register more than one account and state that there are strict and robust controls in place to monitor this. Expenditure histories of the player's account should be visible; further research is required to evaluate if making play activity reports visible is an effective measure.

II. Payment Restrictions

Operators should implement payment restrictions on accounts to prevent fraud and money laundering risks. These include linking payment methods intrinsically to one account so that they cannot be used on other account and limiting players to one card registration at any time.

III. Advice on Maintaining control

Operators should display advice to help players maintain control of gambling habits

Advice on next steps

There should be a central repository of information that could be available to all operators. Operators should be encouraged to apply the responsible gaming information to their leaflets and webpages and seek advice from prevention experts on how it should be best displayed and players alerted to its existence and how to use it effectively.

Providing tailor-made information may be necessary according to different segments of the player population. A central point for general information could be beneficial, but operators should always provide information about the risks of playing games of chance on their website. The Ministry should provide minimum standards for this information that operators must adhere to.

The difficulty with providing information about responsible gaming is that most players don't believe it is relevant to them. And those who are at risk and do need the information don't use it. In all likelihood the best we can hope is to get players to look at visual material, as text is unlikely to be read.

For responsible gaming, the same mechanisms for making information attractive for the player could be employed, as those are used for marketing goals (e.g., use professional poker players, professional athletes). In marketing, it is also the challenge to make information as attractive as possible for the player as well as incorporating good CRM principles.

Further research and agenda

The counselling / treatment and prevention sector in general in the Netherlands is familiar with gambling harm prevention. Its knowledge about this area will increase during the course of the change in legislation and the arrival of regulated Internet gambling in the country. There are strong capabilities in general addictions treatment and much experience in the alcohol, smoking and drugs field that will translate well into dealing with gambling addiction.

Our recommendation for the future agenda would be that counselling / treatment and prevention organisations, operators and other stakeholders, under the supervision of the Prevention Fund and the Ksa have a continuous dialogue about their cooperation and work together to ensure the establishment of a suitable centralised repository of knowledge that operators and the sector can use as required, regularly updated using international best practice.

4. CATALOGUING PLAYER BEHAVIOUR

Introduction

It is now accepted common knowledge amongst most stakeholders that online operators have the technical capability to monitor players' behaviour. For the land-based operators, especially arcades operators, it is less common to implement systems that allow effective monitoring of their players.

An important principle of the stepped care model is that the greater the risk, the bigger the need for intervention. Therefore it is necessary to recognise risky playing behaviour in a timely fashion. To ensure this, the operator must monitor and analyse players and their behaviour in a consistent and unambiguous manner.

Proposed in law

Article 27ja of the Bill

1. Without prejudice to the provisions laid down by or pursuant to Article 4a, the holder of a licence for organising a gambling casino will systematically register and analyse data with respect to a player's gambling behaviour. In doing so, he may process special personal data insofar as this is necessary in order to prevent excessive participation in games of chance or gambling addiction.

Article 30v of the Bill

1. Without prejudice to the provisions laid down by or pursuant to Article 4a, the holder of a licence for having one or more gambling machines present in an establishment as referred to in Article 30c(1), under (b), will systematically register and analyse data with respect to a player's gambling behaviour. In doing so, he may process special personal data insofar as this is necessary in order to prevent excessive participation in games of chance or gambling addiction.

Article 31n of the Bill

1. Without prejudice to the provisions laid down by or pursuant to Article 4a, the holder of a licence for organising remote games of chance will systematically register and analyse data with respect to a player's gambling behaviour. In doing so, he may process special personal data insofar as this is necessary in order to prevent excessive participation in games of chance or gambling addiction.

Academic view on topic

Research outcomes

The new law sets out a number of provisions with regard to the registration and login of players with the licence holder. The player must create for himself a profile in advance of playing that specifies the amount of time and money he is likely to spend as well as the types of games that initially interest him. The operator would then be able to offer direct and normative feedback to the player based on his adherence to stated preferences.

This approach is in keeping with emerging harm prevention approaches in health and pro-social behaviour that are emphasising the need for using 'Nudge' type principle to induce healthier lifestyles (Larimer & Neighbors, 2003; Thaler & Sunstein, 2008).

Some recent studies have been done with college students suggesting that this approach works well in the gaming field (Larimer et al., 2012; Neighbors, 2013).

Monitoring players and behaviour

Monitoring players and their behaviour is not a new approach to harm prevention. From an early beginning, Holland Casino has adopted a prevention policy, of which spotting out risky playing behaviour from visitors and keeping a record of that risky behaviour is an important part. Another important part of the prevention policy is to keep track of a player's visiting frequency. The recorded behaviour and the visiting frequency ultimately formed the base for protective measures administered by Holland Casino, which the majority of visitors found useful (De Bruin 2001).

Monitoring communications from players

Haefeli (2011) has reported that a number of warning indicators for problematic gambling can be conveyed through customer communications. As a result, the close monitoring of calls to helpdesk, forum postings etc., reports of changing settings in time and budget and account closing due to gaming problems will be a useful means of preventing the escalation of risky gaming behavior.

Evidence supporting establishing player profiles

The search for robust behavioural markers for safe gambling behaviour can be found in a) the multiple studies done on Bwin player data by the Harvard University Research group (Gray et al., 2012; Shaffer et al., 2010) b) some UK based investigators (Dragicevic, 2011) in an analysis of Canadian players, c) Italian researchers (Adami et al., 2013) and the work done by Mark Griffiths (Griffiths and Witty, 2010 and Auer and Griffiths, (in press).

Limit setting – general points

In a meta-study of a wide range of gaming harm prevention methods (Williams & West, 2012) it was noted that opportunities for players to make choices about their play and the use of systems to manage their own money and time is a useful harm prevention strategy. Such systems may encourage players to make rational decisions about their gaming and oblige them to retain limits despite subsequent temptations that arise during play.

The ability to automatically reduce limits has been recommended (Auer & Griffiths, 2012; Bernhard, Lucas & Jang, 2006; Griffiths, 2009 & 2013). This would also be a valid reason to contact the player and provide feedback and recommendations for safer play.

Auer and Griffiths (2013) as part of a study of 5000 gamblers suggested that voluntary limit setting is a beneficial harm prevention strategy. They found that company imposed upper mandatory limits can be easily circumvented by players and that encouraging personal responsibility through a voluntary system maybe a more effective approach. They also suggested that externally imposed upper limits can have unintended consequences in that players can develop a false sense of safety, make increased bet sizes and indulge in increased time spent gaming.

In another study, Griffiths and Wood (2010) noted that imposed fixed limits do not encourage gamblers to manage and monitor their own behaviour. Thus any desired transfer of learning from one site to another is not maintained.

The Australian Productivity Commission report (2010) referred to the topic of player choice and voluntary versus operator induced limits systems, to a parliamentary enquiry, which considered evidence over a two-year period. The committee noted that

there is a consensus amongst international researchers and scholars that the use and encouragement of player induced rational decision-making systems is preferable even for problem gamblers (when not playing) over imposed systems that rely on monitoring their behaviour.

The Productivity Committee concluded that a system that allows players to make a rational choice is preferred. Paul Delfabbro, a leading gaming researcher, in his evidence to the committee, suggested that even if limits higher than the mandatory set levels were to be set by a problem gambler, the conscious act of setting these limits is beneficial. The committee concluded that limit setting systems should be offered on all gambling websites and venues. Default limits should be set only with the opportunity for the player to apply these limits to all online gambling sites.

Why the ability to define limits is important for the player

The concept of placing limits on money and time are universally considered to be of great importance by clinicians, psychiatrists, psychologists and social workers in treating problem gamblers and from this experience has filtered through into generally accepted advice on responsible gaming practice. We also know from gamblers who play without developing problems that limit setting is helpful. Wohl (2010) reported that approximately 80% of gamblers in general said they mentally set a limit on their play. For many this is a vague or soft limit (about \$50; between 2-3 hours). Approximately 25% exceed their pre-set mental limit.

This study supports the precept that formal limit setting should be offered to players as means of making this general tendency more concrete especially for the 25% who exceeded their notional informal limit.

There is a general consensus amongst clinicians and academics that the offer of limit options and RG tools in general is useful because they seem to encourage gamblers to reflect on the amount of money and time they spend gambling. In a recent meta-review of the literature, Lucar et al. (2012) concluded that monetary limit-setting features have the potential to help gamblers reduce excessive gambling expenditure, albeit over the long run and in conjunction with other responsible gaming measures that elicit self-reflection (e.g., player history reports, responsible gaming and problem gambling information, pop-up messaging, normative feedback, budget calculators etc.

Further evidence has been gained from Gainsbury et al. (2012) who interviewed 10,838 online players from 96 different countries. This sample included 7,342 Internet casino players with more than three-quarters of participants aged over 35 years. Most participants resided in USA and Canada or the United Kingdom. The results suggested that:

Participants generally reported that they found Responsible Gambling Features (RGFs) useful. Although no feature stood out as critically important most participants stated that they would consider RGFs at least "quite useful". The most popular option was receiving regular financial statements, with 75.1% of respondents considering this option to be at least quite useful and the least popular feature was self-set time limit with 50.3% reporting this as at least quite useful.

Participants were significantly more likely to report that a RGF was at least quite useful if they reported chasing losses (indicator of problem gambling), were under the age of 35 or were female. Those playing at Internet casinos (versus poker players) were also more likely to endorse RGFs with the exception of financial statements and self-assessment. Among the participants, Internet poker players that played with lower stakes were more likely to report that spend limits would be at least quite

useful. More skilful poker players (those 44.9% of the 5,004 respondents claiming that they were either 'quite good', 'very good' or 'extremely good') reported spending limits, time limits and self-exclusion all to be less useful than their less skilful counterparts (those 55.1% of the respondents claiming to be of 'average skill' level or less). Respondents in the US were less likely to rate any of the RGFs as at least quite useful compared to other countries. Participants from the UK were significantly more likely to rate RGFs as at least quite useful, with the exception of self-assessment tests. Canadian, Dutch and Danish respondents were less likely to endorse the usefulness of spend limits. Australian, Swedish, German, Norwegian, Irish and Italian residents were no different in responding compared to other respondents.

In a study by Wardle (Wardle 2011) in the U.K., a high proportion of gamblers reported having set limits on the amount of money spent on any gambling website; with nearly two thirds indicating that they had done this in the past. Far fewer respondents reported that they had never set any limits on the amount of time they could spend on a gambling website. The fact that the majority of gamblers had used at least one form of player protection tools on a gambling website provides a strong mandate of support for these tools.

Limit setting in the player profile.

Lucar et al (2012) recommend that players be required to set a deposit limit of their own choosing as part of the registration process or prior to their first play session after creating an account. The potential advantages of such limit setting have been previously described. Adding a default opt-in option would help to extend the idea of playing safely within one's limits for the entire player population. However, as previously recommended, it should remain an entirely personal decision as to the amounts of the limits.

Self-monitoring and the encouragement of personal responsibility remains an important principle for all gamblers – for those occasional recreational players at no-risk, right through to intense players with an established gambling problem (Blaszczynski et al., 2008).

The conscious act of decision-making about limits on the part of typical gamblers and problem gamblers alike is helpful in promoting personal responsibility and inducing the discipline of informed decision-making. This applies even if limits established by the player seem unrealistic to an observer. Most gamblers, independent of their level of gambling problems, seem to prefer voluntary rather than imposed protection systems (eCOGRA 2007).

Various regulators have mandated on-screen clocks and tools to set time limits on play. Playing longer than planned is a risk practice that increases the likelihood of developing impaired control over gambling. Accordingly, researchers have explored the value of introducing clocks into play. Schellinck and Schrans (2002) found that an on-screen clock was associated with improvements in keeping track of time and staying within desired time limits, but had no effect in actually reducing session length or expenditure. Research by Wynne and Stinchfield (2004) similarly found no effect on machine gambling behaviour. EGM gamblers in a Quebec study reported that having a clock was also not a helpful tool in promoting responsible gaming (Ladouceur & Sevigny, 2009).

In 2001 all gambling machines in the Crown casino in Melbourne, Australia were required to have clocks to display the time of day so that the players could be aware

of the time of day and passage of time, however so far there is very little or no evidence on the effectiveness of the measure. Holland Casino introduced a limited visit system in the early 1990's, additional to the self-exclusion system that was developed in the 1980s. Similar research carried out in 2001 and 2005 shows that these measures are of help for the players.

The proposal under the new law that players should pre-determine the number of site visits they make would be a new type of prevention tool that requires proper evaluation before determining its usefulness. This begs the question of how to assess the cumulative total of all site visits, across all operators can be recorded, with over 2400 current online gaming sites). This may be a useful extension of the capabilities of the national exclusion register in the future for state authorized operators. However, we must acknowledge that it would be hard for players to set limits on the time they wished to spend across all possible sites and venues. There remains a real concern that if a gambler reaches his time or money limit on one site he/she may switch to another site.

Points of attention for policy makers

This literature and our own experiences suggest that the construction of a profile of players may induce greater self-awareness amongst lower risk categories of players and will aid the ability to monitor and encourage responsible play, thus minimizing their escalation of gambling and gambling-related problems. It will provide a useful basis for monitoring and intervention with players at the higher end of the risk spectrum.

In addition, best practice suggests that a large range of limiting options should be made available and furthermore that effective messaging may be an aid to reinforcing the decision to limit and thereby taking more informed and less impulsive decisions about what time and money to spend on gambling activities.

A point of caution is that externally imposed upper limits can have unintended consequences in that players can develop a false sense of safety, make increased bet sizes and indulge in increased time spent gambling.

In summary, we believe the current international consensus amongst researchers and gambling harm prevention experts is that a system whereby the player makes a conscious and voluntary decision about spending limits for gambling is one way to help players maintain reasonable limits and enable those at risk of gambling problems.

Stakeholders view on topic

Stakeholder Views on feedback to the player

Giving feedback to the player was broadly seen as useful way to help players play in a safe and casual manner. A benchmark could be used for normative feedback,

The land-based operators, especially the arcades operators find it difficult to determine quantitatively what normal playing behaviour is. A better measure might be a recommendation on what responsible play looks like. However, a normative feedback system for land-based operators should also be possible, which should focus on providing a 'mirror' for the player on his gambling behaviour, as well as normative feedback which provides a comparison with other players and is more of an advice tool for the player.

Online operators have less trouble with a benchmark. They see a deviation from the 'normal' playing behaviour or playing pattern as a sign of possible problem gambling and as a reason for the operator to contact the player.

Stakeholder Views on setting a player profile

There was broad agreement to the concept of players setting their own parameters on time, expenditure and types of game to be played as long as the process is easy to implement nor a lengthy, otherwise, players may become frustrated and abandon the registration process.

Procedurally, operators recommended that that this process takes only a few minutes. Some operators and researchers have suggested that should players reach their self-imposed limits (time and money), there should be a cooling off period (proposed 24 hours up to 7 days as a maximum) before the limits are changed.

Stakeholder perspectives on cataloguing the player through monitoring and analysis

The general view is that the greater the risk, the bigger the need for intervention. Thus, there was agreement on the need for a stepped care model for the interventions.

Operators agree that in their responsible gaming policies they should describe their escalation procedure, which the Ksa can then test when providing a license. Furthermore, when in place, the procedures (especially online) can easily be audited.

Operators argue that the regulations regarding intervention, and the process leading up to the intervention should not to be strict and / or rigid. The demands and minimum standards the MoSJ expects are still not validated and should not be used as a guiding principle until validated.

It was agreed that developing a good practice in the area would be through involving multiple stakeholders. The requirements should be mandatory for those players getting into trouble and a stepped care approach for those at no- or low risk would be appropriate. It was recognized that small operators might not be able to implement the same sophisticated systems as larger operators.

Conclusions and recommendations

Minimum standards for online operators

The operators should adopt a suitable monitoring system that allows players to set their own limits and then receive detailed feedback from the operator should they deviate from these limits. This means the following:

a) Profile setting and monitoring: The player must, prior to their first play session, create a profile in advance of playing, that specifies the amount of time and money he is likely to spend as well as the types of games that initially interest him. The operator would then be able to offer direct and normative feedback to the player based on his adherence to stated preferences. Stronger interventions when needed will be implemented according to the stepped care model (see below).

b) Financial Limits setting: Tools should be available to set at least daily, weekly or monthly deposit limits. These must be set when a player registers for an account from within his 'Account Profile'. If he is already a customer and wishes to amend the limits then this too can be done. The player must be able to set a deposit limit.

Deposit limits allow the player to impose a restriction on the amount he can initially deposit into the account, before money is spent across the operator's products. The player can decide the amount and choose a period of daily, weekly or monthly. The deposit limit is not affected by any transfers of money between wallets or by withdrawals.

Additionally, all operators follow at least a basic systematic procedure to handle players if they do not play within their own prescribed limits, as entered into the player profile. This will ensure that all players who begin to gamble excessively are not only monitored, but benefit from the application of a care model that will ensure they get the right level of help that is appropriate to their situation. Evidence of this system will be provided as a condition of license award and the Ksa on an on-going basis will monitor effectiveness.

This system of cataloguing playing behaviour gives the operators the means to recognise risky playing behaviour in a timely fashion. Moreover, this system should result in all players realising that a) their gambling activities and behaviours are monitored should they become unsafe and b) there is a safety net that operators must apply to help them gamble within their own stated limits, if for some reason they cannot do this for themselves.

Minimum standards for land based operators

At present the land-based sector cannot monitor player behaviour in detail. The introduction of a detailed system as proposed for the online operators is expected to increase their operational costs.

Nevertheless, we recommend that land based operators keep track of players, albeit in a less extensive way (e.g. cataloguing or remembering manifested signs of risky behaviour or deviant behaviour, recording players visiting frequency). To maximise the effectiveness of monitoring, we recommend training staff in recognising risky playing behaviour.

We furthermore recommend a simple (automated) player registration system for the Arcade sector, as this will make it possible to record players visiting frequency in a more structural and controllable way, while not being labour-intensive.

The land based casino sector has a system (OASIS) in place at present that can monitor player behaviour to a certain extent and can provide information on customer contacts.

Another possibly useful and effective way in monitoring playing behaviour in a land based environment could be the implementation of a system which uses 'player cards', e.g. a card or token that is linked to an individual and identifiable player. Although maybe costly, this system could prove to have the same efficient capabilities in detecting problem gambling as in an online environment. However more research on the possible effectiveness is needed.

Advice on next steps

Online operators will have to either buy suitable player monitoring software or else develop applications themselves, as none of them currently have suitable systems that perform the functions described in the legislation.

Additionally, online operators will have to ensure that the parameter setting process can be completed in an efficient matter that does not try the patience of the potential customer otherwise they will lose that potential new player. Our recommendation would be not to overuse limiting options, but to let players at least fill in the basic and necessary limits such as deposit limits and a time limiting option (e.g. visiting frequency). A limit on multiple different modes of gambling would be optional.

Further research and agenda

The proposal under the new law that players should predetermine the number of site visits seems to be a new type of prevention tool. This calls out the need for a proper evaluation of this measure in order to determine its potential usefulness.

This also leads to the question if the usefulness of this proposed measure is something that needs to be developed. Thoughts are that the cumulative total of all site visits, across all operators can be recorded and can be assessed. Although, with over 2400 current online gambling sites, it might not be an easy task.

This may be a useful extension of the capabilities of the national exclusion register in the future, for state authorized operators. However, we must acknowledge that it would be hard for players to set limits on the time they wished to spend across all possible sites and venues. A concern remains that if a gambler reaches his time or money limit on one site he/she may switch to another site.

Besides evaluating this measure of pre determining the number of site visits, we recommend for the future agenda that all adopted measures are regularly evaluated and updated using international best practice.

5. INTERVENTION WHEN SIGNALS OF RISKY PLAYING BEHAVIOUR ARISE

Introduction

It is increasingly understood by the general public and health and social commentators that operators whose products are potentially harmful, should attempt to offset that harm by taking an active and socially responsible role in society. Proactive intervention with players experiencing harm is expected in the gambling sphere given the potentially very serious financial and family consequences of excessive gambling.

This means that all licensed operators will actively approach players who show signs of excessive play. This enshrines the duty of care principle and ensures that operators enact a defined responsibility for those players. The policy will also help ensure that revenue cannot be derived from those who begin to gamble excessively, as this behaviour will be discouraged and actively stopped in the early stages.

Proposed in law

Article 27ja of the Bill

1. Without prejudice to the provisions laid down by or pursuant to Article 4a, the holder of a licence for organising a gambling casino will systematically register and analyse data with respect to a player's gambling behaviour. In doing so, he may process special personal data insofar as this is necessary in order to prevent excessive participation in games of chance or gambling addiction.

Article 30v of the Bill

1. Without prejudice to the provisions laid down by or pursuant to Article 4a, the holder of a licence for having one or more gaming machines present in an establishment as referred to in Article 30c(1), under (b), will systematically register and analyse data with respect to a player's gaming behaviour. In doing so, he may process special personal data insofar as this is necessary in order to prevent excessive participation in games of chance or gaming addiction.

Article 31n of the Bill

1. Without prejudice to the provisions laid down by or pursuant to Article 4a, the holder of a licence for organising remote games of chance will systematically register and analyse data with respect to a player's gambling behaviour. In doing so, he may process special personal data insofar as this is necessary in order to prevent excessive participation in games of chance or gambling addiction.

Academic view on topic

Research outcomes

Notification of limits

There are a number of studies suggesting that players should be provided with appropriate warning messages (e.g., a pop-up message) that informs them of their remaining limit when they are close to reaching their pre-set limit. This feature should give players the option to choose to continue or to stop playing prior to reaching their pre-set limit (Lucar et al., 2012) as unintended consequences of increased gambling may in fact occur.

Canadian research has shown that pop-up messages on slot machine terminals can be an effective way to increase user adherence to pre-set monetary limits. However participants with higher levels of gambling problems were more likely to ignore their limits than participants with fewer symptoms. This suggests that pop-up limit messages might be an effective tool for those at low or moderate risk, but might not be effective for people with high levels of problems (Stewart & Wohl, 2012).

Gainsbury also advocates the use of well-designed and empirically tested pop-ups to remind players about responsible gaming (Gainsbury, 2009):

The implementation of responsible gambling strategies should be based on empirical evidence and theoretical frameworks wherever possible. However, given the lack of research on Internet gaming, the design of online responsible gambling programs must initially be extrapolated from findings in other fields. One method employed to temporarily attract attention away from a primary task to secondary information contained in messages is the use of 'pop-ups', which have been increasingly incorporated into computer interfaces including software and web browsers.

Player specific feedback derived from monitoring play

Many researchers and policy makers have called on the industry to use technology to track player behaviour. However, as yet there are no reliable and valid methods to determine what patterns of play may be indicative of potential harm with a great deal of certainty. While a number of behavioural analytic systems are in place and are beginning to shed light on this, further research and validation are necessary. Once again, it is important to note that problem gamblers are not a homogenous group and that the motivations for continued gambling in spite of repeated losses, are many.

Self-test for gaming problems

Having a self-test facility is a very useful tool in the prevention of harm from gambling. The Problem Gambling Severity Index (PGSI) is probably the easiest one to incorporate onto the RG pages of a web site as it is easily scored by users. They should then be directed further prevention tools and resources as well as the phone numbers and web addresses of treatment centres.

Interventions stimulated by complaints

As mentioned before, Haefeli (2011) has reported that a number of warning indicators for problematic gambling can be conveyed through customer communications. As a result, the close monitoring of calls to helpdesk, forum postings etc., reports of changing settings in time and budget and account closings due to gambling problems will be a useful means of preventing the escalation of gambling harm. It is important to have a robust and transparent internal complaints handling system. An alternative mechanism for dispute resolution with a third party independent agency is recommended.

Exclusion

Gainsbury in her recent review of self-exclusion (2010) notes that:

The assessments of self-exclusion programs internationally generally find that the majority of participants benefit from such schemes. These benefits include participants reporting decreases in gambling expenditure and improved financial circumstances; decreases in gambling frequency and time spent gambling; reduction in problem gambling severity and negative consequences of gambling; reduction in related psychological difficulties including depression and anxiety; and that they feel they have more control of their circumstances. Even without enforcement, self-exclusions may be somewhat effective because they allow problem gamblers to make

a public commitment to stop gambling. Some problem gamblers will wish to avoid the potential embarrassment of being caught in a break of a self-exclusion agreement.

Partial exclusion of certain types of games

Anecdotal evidence from treatment centres reveals that many problem gamblers have reported that having a range of exclusion options may be helpful. We conclude that having the option to exclude by product, with varying lengths of times, may induce more people who are experiencing difficulties to take positive actions to address their gambling problems. Universal exclusion against all products may reduce its adoption.

Self-exclusion for a certain period

Many of the leading treatment specialists in the world have reached a consensus view that a 'two strikes and out' approach is best for permanent or for a longer period of time self-exclusion from a particular website. Their results suggest limiting such self-exclusions to either a six-month period followed by permanent exclusion would be best.

Gainsbury concluded in her comprehensive review that it is best for self-exclusion schemes to offer multiple options to the consumer. She notes that:

There is a lack of empirical evidence to suggest what length of ban is most effective in assisting individuals to control their gaming. Although longer bans may be more effective in providing individuals with the time needed to overcome their gaming-related problems, these may deter some individuals from registering for programs. It is suggested that self-exclusion agreements be a minimum of six months to allow individuals sufficient time to enter treatment if desired or deal with their gambling problems.

The Responsible Gambling Council in Ontario's review of best practice in self-exclusion (RGC, 2008) concluded that in order to maximise the attractiveness of self-exclusion to problem gamblers and to maximize adherence, ban lengths of varying option should be offered to gamblers.

Involuntary exclusion for six months or longer

Anecdotal data from a range of market leading online operators gives testimony to the need and expediency of this provision. There are clearly occasions when the company must take a decision in a player's best interests, where the player is unable or unwilling to take appropriate action to protect himself. This is a 'Hausverbot' that can only apply to the individual operator.

Exclusion revocation

Anecdotal evidence from treatment providers in Europe suggests that gamblers often have misgivings about having set a self-exclusion. They will consider after a period of time that their luck has changed, strongly believe that they can recover losses, and contend that they can adequately control their gambling. Self-exclusion must remain in force until the time has elapsed. Revocation of a self-exclusion should only be possible after minimum period has elapsed.

Third party exclusions

This measure could be useful but is difficult legally to implement in a lot of jurisdictions, mainly because of privacy regulations. This provision therefore is only of relevance where it currently is provided for in regulation. While only in a very limited number of jurisdictions (e.g., Tasmania, Belgium and Singapore), there may be a

large number of unintended consequences including spousal, parental or child abuse.

Attention points for policy makers

Imposed systems of monitoring and control directly undertaken by operators may be effective in the minimisation of harm as long as the principle of encouraging responsibility and informed decision making based on an informed choice on the part of the player is adhered to. Such systems imply the direct intervention of staff with the player, or at the very least some sort of automated warning message when a pre-determined threshold is about to be passed by the player.

Furthermore, it is important to have a robust and transparent internal complaints handling system. An alternative mechanism for dispute resolution with a third party independent agency is recommended. A complaint, that is actually a cry for help, must be recognized by the helpdesk, and must be dealt with in a helping, reassuring and useful manner. As such, helpdesk employees require appropriate training to detect such indicators and appropriate referral services.

However, proactive intervention with players who may be experiencing harm throws up a number of potential problems that could confound attempts to monitor players:

- I. Firstly, visible behaviour is really only detectable in terrestrial land-based venues. Even here, visible distress may not necessarily be an indication of problem gambling.
- II. Secondly, problem / disordered or pathological gambling is a clinical diagnosis that can only be made by a suitably qualified treatment professional after a psychological / psychiatric screening instrument has been administered to the gambler.
- III. Thirdly, the science of establishing behavioural markers for play patterns that may be on a trajectory to problem play is in its infancy. Useful work in this area has been done by the Division of Addictions, an Affiliate of Harvard Medical School (Gray et al., 2012, Braverman & Shaffer, 2012). They have not yet been able to develop a usable algorithm that would give a reasonable degree of certainty that combinations of detectable behavioural markers are indicative of problem play. Another important issue remains as to how early can aberrant gambling behaviours be detected and whether behavioural interventions actually modify people's playing behaviour. Much research remains to be done in this area.
- IV. Fourthly, the sheer volume of players in online gambling (un-quantified millions of active online players daily across multiple online sites in Europe) makes it impossible to intervene meaningfully with players without the confidence that a useable detection system would provide.

Stakeholders view on topic

Stakeholder views on Types of interventions

Operators argue that the regulations regarding intervention, and the process leading up to the intervention should not to be strict and / or rigid. The demands and minimum standards the MoSJ expects are still not validated and should not be used as a guiding principle until validated.

Operators believe that different solutions are necessary depending on the particular scenario and a proper balance needs to be struck such that the facility is not intrusive for the 95% of players who are not in need of such services.

There has been a lot of discussion and partly a general consensus (and a general practice) that complaints or warnings from a 3rd party about an individual's playing behaviour is sufficient reason for an investigation over playing behaviour. This may eventually lead to involuntarily exclusion in the form of a 'Hausverbot'.

The manner of intervening can also benefit from a good Customer Relations Management approach. For example, contacting the player in a way that is most suitable (e.g., some players prefer to be contacted via phone while others may prefer an online, email or chat approach).

Stakeholder views on Feedback to the player

In the seminar pre-reading discussion paper, a benchmark was mentioned for land-based operators. Although a benchmark can be used for normative feedback, it is viewed as a more quantitative norm. The land-based operators find it difficult to determine quantitatively what constitutes normal playing behaviour given the great diversity amongst individuals. Although land-based operators claim that staff are proficient in identifying problem gamblers in their venues. A better measurement would be a recommendation on what responsible play looks like.

Therefore a normative feedback system for land-based operators should focus upon providing a 'mirror' for the player on his gambling behaviour, as well as normative feedback, which provides a comparison with other players. Also, it is important that interventions should be in the form of advice to the player only.

Online operators have less trouble with a benchmark. A significant deviation from the 'normal' playing behaviour or playing pattern can be a sign of risky or problem gambling and may be a reason for the operator to contact the player.

Gambling and betting online yields an enormous amount of player data that can be used for profiling the individual's gambling behaviour. The view of online operators is that with such profiling, despite the distance and anonymity of online gambling, they get to know the customer better than in a face-to-face environment. The problem here is that someone within the operator's organisation must actually look at this information, as it is not readily observable unless one seeks to find it. Automatic triggering mechanisms can be installed to raise a concern or 'red flag' warning.

One indicator for risky playing behaviour is frequent contact with the customer service personnel of the operator (via emails, telephone calls, etc.). Such communications frequently contain words or phrases that hint at potential problems.

Pop-ups should not interfere with the game to be effective. A proposal is to limit messaging via pop-up messages to games that can be played continuously, e.g. bingo, slot machine and casino table games.

Conclusions and recommendations

Minimum standards for land based and online operators

When indications of risky playing behaviour (e.g. multiple and/or repeated increasing of playing limits) arise, the operator must make an inquiry by contacting that player. If needed (i.e. the player asks for help in playing responsibly or the player is evidently playing irresponsibly), the operator intervenes by choosing the appropriate intervention method, accordingly to the stepped care model.

When an operator makes an intervention, this should be recorded in a file the player's file or records. This file should also contain all relevant data (e.g. indications of risky playing behaviour) leading up to the moment of intervention.

Considerations about the appropriate level of detail

The methods of intervening must be embodied in the AMvB. We recommend, in order of severity, the following methods:

- Handing out RG-information
- Self-test for problem gambling
- Pop up messages with feedback on their playing behaviour
- Contact with feedback to provide a 'mirror' to the player
- Pointing out the possibilities to get help or a referral to care organisations
- Cooling off period (min. 24 hours – max. 7 days)
- Restricting the periods or times a player can visit
- Partial self-exclusion of certain types of (online) games
- Self-exclusion for a certain period of time at one operator
- Self-exclusion for a certain period (minimum is 6 months) for all operators
- Involuntary exclusion for six months
- A life time ban

Advice on next steps

Operators will have to adopt a suitably recommended system for recognising (signs of) problematic or risky playing behaviour. Staff will require training in awareness of problem gambling and in responding appropriately, effectively and efficiently to issues involving vulnerable players.

Further research and agenda

Many researchers and policy makers have called on the industry to use technology to track player behaviour. However, as yet there are no reliable and valid methods to determine what patterns of play may be indicative of potential harm with a great deal of certainty. While a number of behavioural analytic systems are in place and are beginning to shed light on this, further research and validation are necessary. Once again, it is important to note that problem gamblers are not a homogenous group and that the motivations for continued gambling in spite of repeated losses are many.

We have made provision for this measure in case at some point in the future, a reliable set of behavioural markers can be established in order to accurately predict problematic play.

6. GUIDANCE TO PROFESSIONAL CARE

Introduction

For many players, the provision of RG information intervention may be insufficient to encourage responsible gaming. Guidance to counselling / treatment and self-help organisations may be required for more extreme cases. This could be the result of the operator's assessment of the gambling behaviour or at the request of the player.

Following the principles of the stepped care model, guiding the player to care should become an integral aspect of the gambling experience in the Netherlands. Operators will provide measures to identify risky playing behaviour in time and respond with an appropriate intervention. Operators will provide relevant information, relating to help and treatment services to gamblers on their websites and in their venues.

Operators will engage with relevant counselling / treatment and prevention and self-help organisations and achieve an active and productive on-going relationship with them that will be mediated by the Ksa. This will enable operators to understand problem gamblers' perspectives on the impact of gambling products to their situation.

Proposed in law

Article 4a of the current Betting and gaming Act

1. The holders of a license on the basis of this betting and gaming act should take all measures and services which are required to prevent addiction in the games they organise.

Academic view on topic

Research outcomes

Problem gambling typically affects between 0.5 and 2% of the adult population regardless of the legal status of gambling in a jurisdiction. It is often linked to other substance abuse and mental health issues. There is a clear need to encourage help and information seeking amongst problem gamblers and their families/friends.

Typically, problem gambling is treated with individual and group psychotherapy. However, face-to-face services, telephone help lines, self-help groups and discussion forms are available in few countries and for many people getting access to treatment and starting on the road to recovery will be very difficult. Moreover, there are very few clinicians with experience in gambling addiction treatment, even in prosperous European countries. Germany for example, with a population over 80M, only has a handful of specialized treatment centres for problem gamblers.

Where services are available, it seems less than 10% of problem gamblers seek help or treatment (Hodgins & Holub, 2007; Hodgins et al., 2011). In the UK, there are approximately 500,000 problem gamblers. GamCare a charity that runs the national problem gambling helpline receives less than 40,000 calls per year, many from concerned others (predominantly family members, peers or employers). Less than 5,000 seek face-to-face treatment. Alternative treatment models need to be developed to help those in need and gambling operators should be required to help contribute toward the development of such initiatives. Furthermore, help seeking is often not done until a point of despair and the closure of all other options (see Suurvali et al., 2010 & 2012, Hodgins, & Makarchuk, 2001 for a comprehensive

examination of barriers for help-seeking for a gambling disorder). The main reasons given for unwillingness to take-up traditional counselling / treatment and self-help services include:

- Lack of knowledge that they exist
- Cost of treatment
- A lack of recognition of a problem
- The lack of awareness that help can be successful
- The shame and stigma attached to any form of treatment
- Distances required to get treatment
- The fact that some players find their own solutions for getting back in control

The shame and stigma associated with problem has precluded many problem gamblers from seeing treatment. Also services are often housed in substance abuse clinics and gamblers simply do not want to be seen going in to such locations. Online prevention and treatment can help problem gamblers overcome many of the traditional barriers described above. There is good clinical evidence supporting remote self-help therapies for gambling and other mental health difficulties such as anxiety and depression. Internet based counselling / treatment and psychotherapy, while limited in scope, has been shown to be a successful treatment strategy for a wide range of mental health disorders including problem gambling. However, there are significant jurisdictional and professional licensing issues in providing online counselling / treatment and psychotherapeutic services.

The ability to remain anonymous in using on-line interactive services may significantly reduce perceived barriers to treatment seeking particularly those of shame and stigma, to minimise costs and eliminate travel barriers. The instant availability of help at the point of consumption should also encourage substantially more users to explore their personal concerns at an earlier stage. This may, for some, especially those who are developing problems, reduce barriers to attend a traditional treatment centre or call a help-line which is often a step not taken until the point of despair and the closure of all other options. In a lot of other cases this method replaces the traditional forms of prevention and treatment.

Online self-help services may be sufficient for some to deal effectively with their problem by cutting down or abstaining. Others may be encouraged by engaging with the self-help materials to seek face-to-face help, which will prominently sign-posted on the home page of the resources site. Further advantages of on-line self-help include:

- More comfortable and easier access for the gambler.
- More privacy and discretion (allows the counselling / treatment in own house or office)
- More availability: 24/7
- More cost effective: Internet allows you to optimize the fixed infrastructures costs.

Self-help materials can also address the prevention of gambling harm by providing education materials on responsible gaming methods for ordinary (non-problem, or mild risk) players (Suurvali et al., 2010 & 2012, Hodgins, & Makarchuk, 2001).

Points of attention for policy makers

Making links readily available to online self-help resources may have a dramatic effect on the uptake of help by people experiencing significant gambling -related

problems. Given the reluctance of most gamblers who are experiencing difficulties to attend traditional treatment centres it seems logical to offer immediate online help either as a stop gap measure or way to reduce their gambling. Links on the homepage of a website or through a QR code on a machine will make access to these help resources readily and easily available.

Stakeholders view on topic

Operators will need to be guided by the counselling / treatment and prevention sector and/or the Ksa to get the best-known and available information and messaging to players. Operators wish to see the following information need from counselling / treatment and prevention organizations as well as self-help (AGOG) in the Netherlands:

- Contact information
- What services they provide, and where to find it
- Knowledge about the locations where players can go for the services
- Specific services for specific target groups like women, ethnic groups and young people.

The counselling / treatment and prevention organisations wish the following information from operators:

- Knowledge about products offered
- The methods used for detecting players who are having difficulties
- The moment a counselling / treatment organization can get in contact with a player, the aim is a seamless transfer between operator and counselling / treatment organizations, when applicable and necessary.
- Access to their written responsible gaming policies and procedures

Conclusions and recommendations

Minimum standards for online and land based operators

For the guidance to counselling / treatment and self-help organisations and help with responsible gaming we make no distinction between land-based and online providers, since the opportunities and help options are essential for both parties (except the player profile).

To encourage players to find help in self-help and / or professional counselling / treatment, it is important to provide information about help at the appropriate moment with great sensitivity. This means that guidance is interlinked with training and knowledge about responsible gaming and recognising risky playing behaviour.

In the options for self-help and / or professional help, we see a distinction between:

- The counselling / treatment options that the operator may offer to the player (in-house)
- The counselling / treatment options that the operator can offer, but does not have in-house (for this, the operator should have proper information about the possibilities in the Netherlands, and the ways in which a player can find / get in contact with professionals / (self-help) organizations).

We recommend the following model:

- The operator provides information about the help and where the player can go for help available at all times. In this way, the player may, if necessary or desired, seek help on his own initiative.
- A player contacts the operator with questions about available help and counselling / treatment options.
- The playing behaviour gives a reason for guiding the player to self-help or counselling / treatment options. The operator should provide this information when he contacts the player.
- If the player wants voluntary self-exclusion the operator should inform the player about the ways in which he can seek help to make a difference to his playing behaviour and advise him about suitable options.
- When an operator excludes a player directly, this player should always receive an information package about possible help and care.

The counselling / treatment and prevention organisations and operators should have a continuous dialogue about their cooperation and work together to ensure that a player gets the personal motivation to work on playing in a responsible way. For now, we see that the minimum information needed is the following:

Operators need from counselling / treatment and prevention organizations (including self-help: AGOG) in the Netherlands:

- Contact information
- What services they provide, and where to find it
- Knowledge about the locations where players can go for the services
- Specific services for target groups like women, ethnic groups and young people

Counselling / treatment and prevention organizations need from operators:

- Knowledge about products offered
- The methods used for detecting players who are having difficulties
- The moment a counselling / treatment and prevention organization can get in contact with a player; the aim is a seamless transfer between operator and the organisations, when applicable and necessary.
- Access to their prevention policies.

Considerations about the appropriate level of detail

Our recommendation would be to apply the following in the AMvB:

- The help options that the operator should offer at a minimum to the player (in-house), such as the self-test and self-help tools such as further restrictions next to the player profile like excluding from certain types of games.
- Information about the possibilities of help in the Netherlands, and the ways in which a player can find / get in contact with professional / (self-help) organizations).

Advice on next steps

Our advice on the next steps would be the following:

- A central pool for counselling / treatment and prevention organizations, researchers, operators and the Ksa to have a regular dialogue. This platform could be organised by the Ksa.
- Learning from each other (operators, researchers and prevention and treatment organizations) is very important. It should be possible to transfer data for this purpose.

Further research and agenda

Research is needed not only when the market is opening but also beforehand. That way it is possible to understand what happens to the population of players when the online gaming market is open. Also, research on the prevention measures is important: what can we learn to improve these measures, and the effectiveness of the policies. The more insight is gained by researching these measures and policies, the more accurate and effective Key Performance Indicators can be.

7. TRAINING REQUIREMENTS FOR STAFF MEMBERS

Introduction

The desired outcomes of policy are that all stakeholders will be assured that training in consumer protection is an integral aspect of gambling industry practice. This is to be an active on-going process with special attention to the content of the training that is to be monitored by the Ksa or an independent organisation.

Special attention is to be paid during the audit if the necessary (and eventually voluntary) training is actively carried out by operators and followed by the employees. RG does not stand alone there as an extra, but a part of everyday business.

Proposed in law

Article 4a of the current Betting and gaming Act

1. The holders of a license on the basis of this betting and gaming act should take all measures and services which are required to prevent addiction in the games they organize.

Academic view on topic

Training is of vital importance to staff in order to help employees recognise and handle players who may be experiencing gambling-related difficulties (LaPlante et al., 2012). In spite of this need there appears to be minimal empirical evidence as to which components need to be emphasized in the training process (Giroux et al., 2008).

The study by LaPlante et al., (2012) has suggested that after training, participants demonstrated a better understanding of the notions of chance and randomness, and of problem gambling in general. They were more convinced of their role in identifying gamblers in crisis and displayed a greater knowledge of the procedure that has been implemented to help gamblers. At the follow-up, results indicated that participants maintained a good understanding randomness and remained convinced about the importance of receiving information about available help and resources. However, some issues about problem gambling and the procedure implemented to help gamblers in crisis were not well maintained. In conclusion, the awareness training session on responsible gaming allowed employees to increase their knowledge about gaming and improve their attitudes regarding problem gamblers.

LaPlante also found that training in RG should deal with employees' current assumed knowledge and seek to correct incorrect knowledge and also convey knowledge about local regulations and practices. Dufour et al, (2010) evaluated a training program on responsible gaming for Canadian video lottery employees and showed that the training session was effective in improving employees' attitudes regarding problem gamblers and increased their knowledge about how to help. Their results also showed behavioural change after the training, however, these changes were not fully maintained at follow-up suggesting the need for on-going training to maintain long-term positive effects.

Stakeholders view on topic

Operators believe that the present curriculum for the land-based sector should be extended to online, so it is consistent over the different markets. Also, there should be attention for responsible gaming in the education / training of employees in bars and cafés that have slot machines.

Operators feel it is important to define minimum standards, but certify the content of the training instead of how it is integrated in the organisation. The quality of the trainer is also important. The Ksa should provide guidelines for good practices. A regular review on the content of the training is necessary. The accreditation for the training should come from the Ksa or another independent body.

The way an operator will train his employees, should be part of their policy on responsible gaming. Two standards should be added:

- 'Learning from your own company': good and bad practices of everyday work should be discussed during the training.
- Which features of the game trigger risky gambling behaviour?

Three levels of training can be defined: awareness, detection and dealing with 'at risk' and problem gamblers. The standards and different types of training should cover these levels, depending on the role of the trainee in the company.

The goal of training should be clear, and evaluation is also an important feature of training. The form of the training should cover all learning goals, however the duration of training is not so relevant.

Training should be interactive, and there should also be the possibility of blended learning: different types of learning opportunities and different types of learning (e-learning, face-to-face, etc.). The communication skills should be in line with the communication method that is used. Also, training should be interactive and teach basic content. In-house training should be possible, but also attending open group sessions for several small operators. This choice is to be made by the operator.

When an employee follows and completes the training, he should receive a certificate from the trainer (training agency / organisation). The Ksa should provide certificates to the trainers. For new staff, they should undertake training as soon as possible but in any case within 6 months. Learning about responsible gaming should be an on-going process within a company. A refresher course should focus on new insights, and is preferably a face-to-face session, as this makes interaction between trainees possible so they can share experiences and best practices. Also, senior management should communicate about the importance of the follow-up course and why it is necessary.

All online operators with a license are responsible for their affiliates. In the Netherlands the regulation follows a business-to-consumer approach.

Conclusions and recommendations

Minimum standards for online operators

The present curriculum for land-based should be extended to online, so it is consistent over the different markets.

An awareness training session on responsible gaming allows employees to increase their knowledge about gambling and improve their attitudes regarding problem gamblers. Therefore, operators should provide all employees with information on responsible gaming through training programmes. Operators should ensure that appropriate levels of awareness of problem gambling are maintained throughout the organisation, so that responsible gaming is made an integral part of daily operations. Based on job demands and their level of customer interaction, relevant employees (including temporary staff and contract staff) are given additional training on problem gambling, particularly how to communicate with players in referral to sources of help.

Training is required to ensure that all employees have an understanding of and awareness about problem gambling and that they recognise the importance of responsible gaming. Employees who deal directly with players need to be able to respond appropriately, effectively and efficiently to issues involving vulnerable players.

All operators should aim where possible, to ensure that employees with customer facing roles receive problem gambling/responsible gaming awareness training within their first three months of employment.

Refresher training should be given preferably every other year, depending on the level of knowledge and the position in the company and where any knowledge gaps are identified, re-training will be given when required.

Based on this evidence, we conclude that operators should put in place seminars on responsible gaming for all senior managers, team leaders and key customer service personnel with the following objectives:

- To correct inaccuracies staff may have about problem gambling
- To equip participants with knowledge and skills to understand problem gambling and consumer protection
- To enable participants to take ownership of the responsible gaming policy and procedures promoted by the company
- To equip key staff with the skills and confidence to be able to handle calls from distressed players and to successfully resolve these in the interests of all parties

The content must include:

- Current knowledge and understanding
- The spectrum of gambling behaviours
- The nature of gambling addiction
- The likely manifestations of problems in players
- Particular problems of under-age gambling
- Real life scenarios
- Best responses to distress
- Real life cases and role-plays

To encourage players to find help in self-help and / or professional care, it is important to provide information about help at the appropriate moment with great sensitivity. This means that training and knowledge about responsible gaming and recognizing risky playing behaviour is interlinked with guidance to care.

Considerations about the appropriate level of detail

We recommend to apply the following in AMvB:

- Training is carried out by specialized agencies and is to be accredited by the Ksa.
- The goal of training should be clear, and evaluation is also an important feature of training.
- The form of the training should cover all learning goals
- All online operators with a license are responsible for their affiliates, and therefore also for the training of those employees when necessary.

We recommend to apply the following in MR:

- The minimal elements of the general training
- The minimal elements of the training specific for those employees with customer contact.

8. PROMOTIONAL ACTIVITIES AND INFORMATION PROVISION TOWARDS PLAYERS

Introduction

Operators in the Netherlands will not direct advertising at minors and vulnerable groups. Operators should have advertising and marketing codes which seeks to ensure that advertising and sale promotion activities do not encourage underage or problem gambling and do not provide the gambler with misleading information, such as a false impression of the odds of winning. Operators will also comply with relevant voluntary and mandatory codes that are available in the Netherlands (Gedrags- en Reclamecode Kansspelen) and / or the branche related Code of Conduct (Code on Promotional Games of Chance) on advertising and marketing) relating to the provision and marketing of its services. In accordance with the duty of care, when risky gambling is detected, all forms of marketing to a player will stop.

Proposed in law

Article 4a of the current Betting and gaming Act

1. The holders of a license on the basis of this betting and gambling act should take all measures and services which are required to prevent addiction in the games they organise.

Academic view on topic

Research outcomes

The points below are taken from a review by Derevensky (Sklar & Derevensky 2011):

Advertising is one component of the ‘marketing mix’, which also includes price (low affordability of machines facilitates high supply and demand), promotion (extends beyond advertising to include wide-ranging promotional strategies; even the alluring sights and sounds of machines act as a potent form of promotion), placement (best summarised as ubiquity) and product (machine design and market positioning). Although ads cannot be regarded as directly causative of behaviour in any facile way, they are nevertheless one part of a constellation of normalizing influences that can be effectively targeted by policy guidelines in the interest of public health, as evidenced by increasingly tightened Canadian legislation directed at the advertising of alcohol and tobacco products. Though no one would suggest there is any simplified “magic bullet” effect in gaming ads, it is fair to assume they contribute to a normalization of gaming as entertaining and harmless (2011:534-551)

Based on the empirical evidence to date, Sklar and Derevensky recommended the following guidelines to regulate marketing of gaming products to reduce the impact of this advertising on youth and protect this vulnerable population from harm:

- *Gaming advertisements should not be permitted to be shown during television and radio timeslots primarily accessed by children or adolescents or advertised where they may be frequently viewed by youth, including on billboards, on public transport, and in print publications where a prominent proportion of readership are minors.*

- *Given the influence of point-of-sale advertising on children and adolescents, it is recommended that these advertisements be restricted from display in all stores entered by minors.*
- *Operators and trusts that principally generate their revenue from gaming should be banned from promoting or advertising their name or products, including naming rights, branding, and logos through the sponsorship of sporting teams and events.*
- *Products promoting gaming or gaming operators should not be manufactured in child sizes, be available for purchase by minors, or be given away in promotions or as prizes.*
- *Gaming corporations should be restricted from utilizing product endorsements from individuals who are likely to appeal to youth and increase the likelihood of youth gaming involvement.*
- *Advertisement for both gaming and practice Web sites should be subject to the same regulations described for advertisement of gaming products. In addition, free or practice sites should be prohibited from containing advertisements and direct links to online gaming sites and should have the same pay-out rates as their actual gaming site.*
- *Online and wireless gaming operators should be prohibited from advertising via SMS alerts to mobile phones.*

In an earlier review, Derevensky established the following principles¹:

- *Advertisements for gaming products must contain accurate information regarding the chances of winning and a visible warning statement that highlights the potential risks associated with excessive gaming.*
- *Gaming advertisements should not be allowed to include images or sounds of excessive spending.*
- *Youth-oriented graphics, including animals and cartoons, music, celebrity promoters, and youth themes such as board games, and being cool, should not be used to market or advertise gaming products.*
- *Gaming advertisements should not include or depict any individual who is or appears to be under the age of 25, to prevent youth from relating to individuals gaming or winning.*
- *Regulations for gaming advertisements should be mandatory, enforced, and continually evaluated by an independent regulatory body.*

The Queensland Responsible Gaming Guidelines² state that individuals should not be emailed or direct-marketed about gaming products (such as player loyalty programmes) if they have 'not consented to receive such material or have expressed a wish in writing not to receive such information' Regulation of inducements provides an example of how different jurisdictions may choose to approach marketing strategies in different ways. For example, Section 4.7.10 of the Victorian Gaming Regulation Act makes it an offence to 'offer any credit, voucher or reward as an inducement to open a betting account' (Gaming Regulation Act, 2003). However, there are no such restrictions in the Northern Territory or Tasmania.

Points of attention for policy makers

Another approach would be to create barriers in a way that certain information cannot reach minors and vulnerable groups. Filtering solutions allow parents to regulate access to the Internet, based on chosen criteria. Parents can use filters to prevent

¹Available at: <http://www.camh.net/egamblinggaming/issue22/pdfs/07monaghan-derevensky.pdf>

²(Queensland Office of Gaming Regulation, 2007, p. 7).

their children from accessing, amongst other things, gaming websites. Because gaming website pages are 'labelled', filtering solutions can prevent gaming access, and block our pages. Examples (but not limited to) are Net Nanny™ (www.netnanny.com) and CyberPatrol (www.cyberpatrol.com)

Stakeholders view on topic

- Operators stated that a lot of the suggestions regarding advertising in the discussion paper are already in existence in the current (lower) legislation and the new Code Promotional Games of Chance.
- There was an agreement on the majority of the suggestions regarding promotional activities and that for the most part, it is already common practice. Some operators claim that their RG department makes sure that, when risky gambling arise, direct marketing to that player stops.
- Many of the online operators make use of Facebook for their promotional activities. One operator pointed out that there is age verification on Facebook, although they acknowledge that it is still possible to have a Facebook account as a minor. They claim this should be a minority and this operator finds the risk that a small group is targeted acceptable.
- Regarding the bonuses, there is also an agreement that they should not be misleading, and that they should not be offered to vulnerable players, i.e. players who want to exclude themselves or who ask for help.

Conclusions and recommendations

Minimum standards for online operators

We recommend the following:

- Advertisements for gambling products must contain accurate information regarding the chances of winning and a visible warning statement that highlights the potential risks associated with excessive gambling.
- Gambling advertisements should not be allowed to include images or sounds of excessive spending.
- Youth-oriented graphics, including animals and cartoons, music, celebrity promoters, and youth themes such as board games, and being cool, should not be used to market or advertise gambling products.
- Gambling advertisements should not include or depict any individual who is or appears to be under the age of 25, to prevent youth from relating to individuals gambling or winning.
- Gambling advertisements should not be permitted to be shown during television and radio timeslots primarily accessed by children or adolescents or advertised where they may be frequently viewed by youth, including on billboards, on public transport, and in print publications where a prominent proportion of readership are minors.
- Given the influence of point-of-sale advertising on children and adolescents, it is recommended that these advertisements be restricted from display in all stores entered by minors.
- Gambling corporations should be restricted from utilizing product endorsements from individuals who are likely to appeal to youth and increase the likelihood of youth gambling involvement.
- Operators and trusts that principally generate their revenue from gambling should be banned from promoting or advertising their name or products,

including naming rights, branding, and logos through the sponsorship of sporting teams and events.

- Products promoting gambling or gambling operators should not be manufactured in child sizes, be available for purchase by minors, or be given away in promotions or as prizes.
- Advertisement for both gambling and practice Web sites should be subject to the same regulations described for advertisement of gambling products. In addition, free or practice sites should be prohibited from containing advertisements and direct links to online gambling sites and should have the same pay-out rates as their actual gambling site.
- Online and wireless gambling operators should be prohibited from advertising via SMS alerts to mobile phones.

Advice on next steps

Regulations for gambling advertisements should be mandatory, enforced, and continually evaluated by the Ksa or an independent regulatory body.

9. TOWARDS A QUALITY SYSTEM FOR SOCIALLY RESPONSIBLE GAMING

Introduction

The field of gambling studies is relatively young (less than 30 years, with some areas such as Internet gambling only beginning to gain widespread popularity in the past decade). Today, direct empirical evidence on the effectiveness of many existing responsible gaming tools and prevention strategies is very limited. The lack of research has not been helped by there being a limited number of researchers in the field, a lack of funding, and poor accessibility to corporate data.

Nevertheless, current online and land-based operators have in general adopted RG policies or harm prevention policies, which for now often are the result of best practices and lessons learned. As with any business process, it is prudent to evaluate the quality of those adopted RG policies or harm prevention policies from time to time, and to assure that the risk potential of the offered games and used promotional activities is still within bounds.

With time, developments in the field of gambling studies should provide useful research outcomes and valuable insights, which – along with the already acquired experiences and best practices – ultimately will contribute to a generally accepted template for socially responsible gaming invoking procedures.

Proposed in law

Article 4a of the current Betting and gaming Act

1. The holders of a license on the basis of this betting and gambling act should take all measures and services which are required to prevent addiction in the games they organize.

Although a mandatory quality management system or a mandatory risk assessment procedure is not part of the proposed law, according to the provisions under article 4a of the current Betting and gaming Act, all operators should have a prevention policy that is current and effective.

Academic view on topic

Based on different characteristics of gaming types, a selection of relevant characteristics can be analysed. These characteristics were identified with different weights and differentiated scaling values to evaluate the risk potential, which ultimately can be used in a reliable assessment tool for risk evaluation of gaming types and for highlighting where the specific risk potential of each specific gaming product lies (Meyer et al. 2011& Blanco et al. 2013).

Problem gambling is a phenomenon that results from complex relationship between the player, the mode of gambling and the environment in which the player and the mode of gambling interact. The idea that an individual gambling product can be addictive can sometimes be misleading.

A good model for generic gambling risk assessment can be found in the Nova Scotia system³. This model highlights the need for operators to adopt a code of practice on responsible gaming and advertising. This model does not provide a methodology to determine the supposed addictiveness of individual products.

Stakeholders view on topic

Stakeholders view on possible risk of products

- There are many ways to do a risk assessment and there are already some systems that can be implemented. Some of them claim to be able to assess the addiction potential of gambling products.
- The downside of risk assessments might be that for smaller operators such systems or procedures might not be viable options as they might be too expensive. However the concept of a risk assessment does not necessarily mean that such a system should be implemented, nor is it meant to restrict game design beforehand on a mandatory basis.
- One participant agreed with the principle of risk assessment, but said it is more important to see how it works in actual practice, and that the effects are verifiable. For that reason, one operator collects data (e.g. possible rise in complaints, more playing, more requests for exclusions) so that they can assess if their games have potential risks.
- Some participants pointed out that what this operator does is monitoring afterwards, and not a risk assessment before they implement a new game of chance or apply a promotional activity. The downside of that is, that players already have been put at risk, before the operator can conclude that a game of chance or promotional activity is risky, and can act accordingly.
- The Ksa remarked that this shows that defining criteria of risky aspects of a game or a promotional activity can be useful for assessing the risk beforehand.
- There is a broad consensus that it is not possible to determine in detail what the addictive features exactly are. Although, there is a general consensus that some aspects of gambling are considerably less problematic than others, namely the long odd character found in regular lotteries.
- There is an agreement that it is unwise to put such detail in (lower) regulation.
- The question still remains what kinds of risk are acceptable, and the suggestion is made that this could be a task for the Ksa.

Stakeholders view on a continuous dialogue

- There was an agreement that there should be a central pool for prevention and treatment organisations, researchers, operators and the Ksa to have a regular dialogue. This platform could be organised by the Ksa.
- Learning from each other (operators, researchers and prevention and treatment organisations) is very important. It should be possible to transfer data for this purpose.
- Research is needed not only when the market is opening but also beforehand. That way it is possible to understand what happens to the population of players when the online gambling market is open. Also, research on the prevention measures is important: what can we learn to improve this

³ Available at:
http://www.gamingns.ca/images/uploads/SR%20Assessment%20Template_Sept%2009.pdf

measures, and the effectiveness of the policies. The more insight is gained by researching those measures and policies, the more accurate and effective Key Performance Indicators can be.

Conclusions and recommendations

Minimum standards for online and land based operators

Socially responsible gaming entails operators who are aware of the risk potential of their offered games and used promotional activities. Although, there are different views during the workshop whether it is possible to determine in detail what the addictive features exactly are, we recommend a risk assessment procedure. We believe that a risk assessment will encourage operators to think about the risks first before offering new products, or before applying promotional activities.

We recommend that before launching a new product or service, operators should conduct a social impact assessment using a structured assessment methodology to examine relevant risk factors. Such assessments will also be conducted on new variations to existing products and promotions. The risk factors are documented and any mitigation strategies clearly recorded so that the assessment can be reviewed as necessary.

Another step towards socially responsible gaming should be a proactive harm prevention policy that is current and effective. Regarding the effectiveness, this means that operators should implement effective strategies to minimise the negative impact of the aforementioned relevant risk factors. To have a policy that is also current, the operator must have a process or a quality management system in place to ensure that the quality of the adopted RG policies or harm minimisation strategies are regularly evaluated and are updated regularly to the latest state of the art.

We recommend that the process of the operator continuously evaluating and assuring the quality of his responsible gaming policy should be monitored by the Ksa. That way, the Ksa can ensure that operators apply a basic quality assurance methodology to ensure the safety of their products (i.e. games, advertising and promotions) before they are placed on the marketplace. Furthermore, that way the Ksa can ensure that the operator's harm prevention policy is current and effective. In this way the burden of regulation is lessened and more emphasis is placed on operators to ensure their products are fit for purpose, in other words that they can be enjoyed safely by the majority of gamblers without undue harm being caused.

In accordance with what was discussed during the workshops, we believe strongly that the Ksa should play a role in promoting socially responsible gaming. We recommend that the Ksa should act as a discussion partner and as an intermediary connection between the operators, the help organizations, the researchers and other stakeholders. This way the Ksa can start a continuous dialogue between those parties to ensure that adopted prevention policies like the stepped care model and the risk assessment procedures, are current and effective.

Our recommendation would be that this dialogue be used to share insights and to find common ground between the parties, which can be used to find better and more effective ways of conveying the importance of responsible gaming to all players, to find better methods of detecting risky and problematic playing behaviour, and to define better methods of intervention.

Additionally, we recommend that this dialogue be used to improve research outcomes on questions that the operators and the treatment / care organisations need to have answered to substantiate the effectiveness of responsible gaming tools and harm prevention strategies.

Considerations about the appropriate level of detail

We recommend to apply the following in AMvB:

- As part of their prevention policy, an online operator should describe his risk assessment protocol to help assess any potential problems posed by new products or promotion
- There are multiple ways to do a risk assessment, with some screening instruments readily available.⁴ However an operator may well devise a suitable methodology himself as long as these are verified by the Ksa as being fit for purpose.

We recommend to apply the following in MR:

- The operator should use this protocol before launching a new product or service. If a product fails the assessment, Operators should revise the product and review it's marketing to limit the risk. In some situations, a decision not to launch the product or promotion may be taken.
- The operator makes a report about the outcomes of the assessment.

Advice on next steps

Pathological/disordered gambling is a phenomenon that results from complex interaction between the player, the mode of gambling and the environment in which the player and the mode of gambling interact. The idea that an individual gambling product can be addictive can be misleading.

Further research and agenda

The question still remains what kinds of risk are acceptable. Research should focus on the risky elements of the games of chance and what kind of risks are acceptable. The suggestion is made that this could be a task for the Ksa in cooperation with researchers, operators and other stakeholders.

⁴ A good model for generic gaming risk assessment can be found in the Nova Scotia system, which is available at: http://www.gamingns.ca/images/uploads/SR%20Assessment%20Template_Sept%2009.pdf

10. CONCLUSIONS

General conclusions

We strongly believe that players, operators and the counselling /treatment and prevention and self-help organisations benefit from socially responsible gaming. Ideally, the notion of responsible gaming forms an integral part of the operator's corporate identity. Nonetheless, socially responsible gaming should be a part of a solid harm prevention policy. Therefore, assuring and maintaining a high quality for the operator's harm prevention policy is imperative.

With the stepped care framework, the Dutch regulation of remote games of chance offers a responsible gaming policy that is in line with the recent scientific knowledge about gambling and is workable for operators.

Operators provide players with fair and adequate information to make informed choices. The responsible gaming information should cover possible problems and harmful effects of gambling, as well as tips and advice that can help the players enjoy gambling responsibly.

We believe that a system whereby the player makes a conscious and voluntary decision about spending limits for gambling is the best way to help players maintain reasonable limits and safeguard those at risk of gambling problems.

When indications of risky playing behaviour arise, the operator must make an inquiry by contacting that player. If needed, the operator intervenes by proposing the appropriate intervention method, according to the stepped care model. To encourage players to find help in self-help and / or professional help, it is important to provide information about help at the appropriate moment with great sensitivity. This means that guidance to help is interlinked with training and knowledge about responsible gaming and recognising risky playing behaviour.

Awareness training on responsible gaming allows employees to increase their knowledge about gambling and improve their attitudes regarding possible problem gamblers. Based on job demands and their level of customer interaction, relevant employees (including temporary staff and contract staff) are given additional training on problem gambling, particularly in referral to sources of help.

To make sure that the prevention policy stays relevant and in line with the latest insights on responsible gaming, a quality system should be in place. We believe that a risk assessment will encourage operators to think about the risks first before offering new products, or before applying promotional activities. Another step towards socially responsible gaming should be a harm prevention policy that is current and effective. This means that operators should implement effective strategies to minimize the negative impact of the aforementioned relevant risk factors.

We recommend that the KSA monitors the process whereby the operator evaluates and assures the quality of his harm prevention policy.

Support from the sector

The actual implementation of the prevention policies of operators is very important for the success of their targets on harm prevention. Therefore the Dutch government aims for regulation that is workable and fits within the business models that are

common for the operators in the remote gambling sector. With the three workshops that were organised, we believe that the MoSJ has listened and developed regulation in cooperation with stakeholders. Also, with this dialogue the MoSJ has the opportunity to implement a framework that is workable for operators, in line with the wishes from counselling / treatment and prevention and self-help sector and suitable for the Ksa.

The Dutch framework compared to other jurisdictions

In the Netherlands, we see a firm and logical framework for responsible gaming due to the stepped care principle and continuous dialogue within the sector. Compared to other jurisdictions, the Dutch legislation goes one step further in demanding professional gambling operators to play a strong role in harm prevention. For example, when a player exceeds his limits on the player profile there is the obligation to inform the player about his behaviour and provide the player with a proposal using proper interventions.

With this next level in responsible gaming, we hope other jurisdictions will be stimulated to further improve their responsible gaming legislation.

Stakeholders' comments on the conclusions

Before publishing the final version of the advice on the framework for the prevention of problem gambling and addiction, the participants were given the opportunity to comment on the conclusions of the advice, and the advice as a whole.

One of the commentators said that all participants are to be applauded for acknowledging the importance of responsible gaming, but the framework relies too much on the responsibilities and the actions of the operators. It is up to the gaming authority to develop objective criteria for determining risky and problem gambling. Furthermore, the commentator expressed the importance of social control for optimizing harm prevention. Therefore, utilising the help of family members in keeping gambling behaviour in check was recommended.

In another remark, the notion of responsible gaming – where players, operators and the government have a shared responsibility – was acknowledged. However, the importance of playability and players' gaming experiences, not being affected too much by the proposed measures is an aspect which has been neglected in the advice. The commentator thought that such limitations might scare players away from the licensed operators.

In another comment, the importance of a shared responsibility in finding the effective intervention method was emphasized. Both the operator and the player must make the appropriate effort to maximise positive client outcomes. Furthermore, the importance of upholding self-exclusions, and not revoking them too easily, was pointed out in the comment.

Another commentator expressed the need for having a clearer distinction between the land-based gambling sector and the online gambling sector in the advice. The commentator thought that the land-based gambling industry is already equipped with an addiction-prevention system that has proven its value and that further measures for land-based operators are unnecessary. Moreover, while some of the proposed measures might be useful in an online setting, the commentator thought that such

would be useless in a land-based arcade. It was pointed out in the remark, that including any further (self-imposed) playing limits for customers of land-based arcades, is unnecessary due to existing regulations for arcades and limitations on slot machines. Furthermore, the commentator thought that the small scale setting of arcades, wherein qualified personnel are in close personal contact with their customers, ensures a confidential relationship between operator and customer, which makes the land-based situation ideally suitable for a qualitative approach. For those reasons the commentator thought that registering the visiting frequency of players and applying a registration system of some sort, would be useless in a land-based arcade and could get in the way of more effective personal contact. The comment in general conveyed a concern that the additional measures for land-based operators will be too specific, unnecessary, burdensome and costly.

Next steps

With this advice an initial impetus to a framework for the prevention of problem gambling and addiction has been made. Although, the comments from the stakeholders still makes it necessary to do some further thinking. The points that were made are taken into consideration when working out the lower regulation.

Our recommendation for the future agenda would be that counselling / treatment and prevention and self-help sector and operators have a continuous dialogue about their cooperation and work together to ensure the establishment of a suitable centralised repository of knowledge that operators and the care sector can use as required. It should be regularly updated using international best practice. Learning from each other (operators, researchers and counselling / treatment and prevention and self-help organisations) is very important. It should be possible to transfer data for this purpose.

One important point on the agenda should be to enable further dialogue to achieve a concrete solution to bridge the gap between help provided by the operator and help, or healthcare services provided by the care and prevention organisations. The anticipated Prevention Fund to fight gambling addiction in remote games of chance should also be a point on the agenda. This fund will be used to finance (anonymous) treatment (e.g. online) and to do research into prevention and treatment. The dialogue between treatment /care and self-help sector, operators and the Ksa is very suitable to provide proposals for this Fund. We would suggest a workshop is planned to discuss this specific matter.

Appendix 1: Explanation of the evidence base

A review and analysis up to date peer-reviewed scientific research, best practices and regulations in international jurisdictions, and our views based on our own extensive experience is given below. We have taken into account:

- Literature reviews of relevant published and peer reviewed studies.
- Relevant global legislation
- Emerging best practice in UK and other jurisdictions
- The views of leading researchers who have investigated these topics
- Industry best practice concerning player protection

Nevertheless, in our view many of the findings presented below are useful in providing protection directly to consumers and the public as they represent some general assumptions about best practice that have been made with respect to responsible gaming (RG) features proposed, by clinicians and researchers in the field.

Many of the proposed features and recommendations can be implemented as the basis for the collaborative efforts toward harm minimization and the prevention of problem gambling in the Netherlands, through the actions of operators, counselling / treatment and prevention and self-help organisations and governmental bodies.

The principles of RG must be fundamental to all future developments. RG is the behaviour scenario whereby the gambler:

- Views gambling as a form of entertainment that costs money
- Sets and maintains limits (mental or physical, if necessary) concerning both time and money to be spent
- Is encouraged to take responsibility for his / her action at all times, based on informed decision making and an 'informed choice' to gamble (operators, counselling / treatment and prevention and self-help organisations and government will ensure that all relevant information is made available and easily accessible)

Evidence refers to the pool of knowledge on RG derived preferably from empirically validated, peer-reviewed research, and working consensus amongst recognised experts. From a public health perspective this may also include precautionary principles that fall on the side of prohibiting actions until they can be demonstrated to work safely within adequate regulatory safeguards, in order to ensure no unintended consequences. From a pragmatic public policy perspective there are strong arguments from academics in the USA, Canada, Australia and the UK that evidence is best drawn from a range of sources to achieve a working consensus on best practice (Pawson, 2013).

Range of Harm in Gambling

In order to understand why RG is important, we must consider the harm that excessive gambling can cause individuals, their families, and society. Based on an individual's gambling behaviour and related gambling-related problems, psychiatrists, psychologists, clinicians, social workers and financial counsellors place gamblers into categories according to their response to a number of problem gambling screening instruments, the most common of which are the DSM 5, SOGS, CPGI, PGSI and NODS (American Psychiatric Association, 2013; Volberg & Williams, 2009).

It is important to note that problem gamblers are not a homogenous group. They differ by the types of games in which they engage, their motivations for gambling, associated mental health issues, gender, cultural factors, etc.

Longer-term longitudinal research about gamblers tells us that they often move between different risk categories over time, with some even moving from problem gambler to no-risk, without the aid of an external intervention, a phenomenon known as 'natural recovery'. Research suggests that less than 10% of individuals with significant gaming problems actually seek professional help or treatment (Hodgins, Sta & Grant, 2011; Hodgins & Holub, 2007; Shaffer & Martin, 2011). From empirical sources we know that in general, especially in Europe, not more than 1% of problem gamblers make use of self-help groups like AGOG.

Best Practices in Responsible Gaming and Social Responsibility relevant to the Elaboration of the Prevention Policy

The following table covers practices relevant to the duty of care described under the new legislation, intended to minimize gambling-related harm from expanded gambling opportunities in online and terrestrial environments. We have given some items greater prominence than others, to indicate our view of their relative importance. Scientific evidence generally becomes weaker the more detailed the provisions become.

Appendix 2: A Possible Risk Assessment Protocol

If a company wishes to use a Risk Assessment procedure, then this protocol for a Social Risk Assessment (SRA) process could apply to all products and advertising promotions. It can be used by all relevant managers in consultation with the Responsible Gaming Manager (the SRA Champion) or equivalent role in your company. This post-holder should have ultimate ownership of and responsibility for the SRA. The SRA involves a graduated process:

Level A Assessment

Level A Assessment is expected to account for the majority of assessments and is essentially concerned with the delivery stage of products and promotions. It is a checklist and test exercise for the project managers who are in charge of the early stages of new product or promotion development. This level will include the following categories of projects / initiatives:

- Substantive variations to existing products
- Variations or updates to existing (and therefore approved) advertising campaigns or promotions

If it is unclear whether the project falls under this level, the SRA Champion will assess and consult with the relevant project manager to determine the appropriate level. If a project falls under *Level A*, *Step 1* must be completed by the relevant project manager:

Step 1 - Questions:

1. Are the Company player protection tools built into the product?
2. Are the links to the Responsible Gaming page in place?
3. Has sign off for the promotion been obtained from the Legal team through normal approval processes?

In order to pass the *Level A* Assessment, the answer to all three questions must be "Yes." Once the checklist has been completed, it is forwarded to the SRA Champion for review and sign off and a copy is retained with the project file. If the project fails the *Level A* Assessment, it does not proceed until revisions have been put into place that should enable a *yes* to be answered to all questions and the project to pass the *Level A* assessment.

Level B Assessment

A *Level B* Assessment is expected to account for 20-30% of all assessments completed. It will involve meetings between the product/promotion project team and the Responsible Gaming (RG) team at an early stage in the design of the project. It is important that RG principles are built in at the concept/early design stages, to consider the design, audience, targeted customer, marketing approach and commercial impact. This level will apply to:

- All new products
- New advertising campaigns or promotions regardless of media used
- Any product or promotion that has been the subject of a third party complaint

- Any product or promotion that in the view of the SRA Champion should not have passed Level A
- Existing products being presented for the first time in in new jurisdictions

If a project falls under this level of assessment, the following three steps must be completed by the SRA Champion working with the project manager:

Step 2- Further Questions:

1. Does this product align with the principles of the company RG Charter or equivalent document (see Appendix 1 below for an example of an RG Charter)? **Yes /No**
2. Does this advert or promotion align with the requirements of the Ethical Advertising/Marketing Guidelines or equivalent document (see Appendix 2 below for an example of such Guidelines)? **Yes /No**
3. Will it avoid targeting minors and vulnerable groups? **Yes/ No**
4. Will it support or have a neutral impact on existing Company programmes to prevent problem gambling? **Yes/ No**
5. Has a similar product/promotion been free from regulator criticism or sanction? **Yes/No**
6. Will this initiative enhance the reputation of Company as a socially responsible operator? **Yes /No**

Step 3 - Detailed Information Assessment:

The SRA Champion gathers information about the impact of similar products initiatives / projects, or equivalent document (see Appendix 1 below for an example of an RG Charter). This may include: briefings, research reports, market assessments, expert opinions, etc. The information provided as a result of this step should include every reference available that directly relates to the new initiative being undertaken. The findings will be summarized into a concise briefing note. The format should include an explanation of the project, a synopsis of the findings of the jurisdictional review and an informed hypothesis of what is believed to be the social impact of the project.

Step 4- Internal Situational Analysis:

The following questions are to be answered based on the analysis from the information gathered in Steps 1 to 3 and documented accordingly:

1. Completed Level A assessment questions?
2. What is the demographic profile and risk profile of the target audience / customer?
3. Will this inappropriately entice play by minors or vulnerable groups? Why or why not?
4. What is the view of external stakeholders (problem gambling NGOs church groups etc.)? Do they need to be formally consulted / engaged? How and when?
5. What are the top three RG and top three public relations risks? How will they be managed?

Submissions for a *Level B* Assessment may be elevated to a *Level C* Assessment based on the SRA Champion's analysis of the item. In order to pass a *Level B* Assessment, *Steps 1 to 4* must have been completed and any necessary alterations made to the project.

Level C Assessment

All remaining assessments fall under this level and will usually apply to the adoption, by the Company, of a new type of gaming offer not currently part of the product suite.

If a project requires a *Level C* Assessment, all steps of the *Level B* Assessment must be completed in addition to Step 5 below which is obtaining an external expert review, and in some instances, Step 6.

Step 5- Expert Review

This step should be taken if a new product or program is being introduced or a new distribution channel being launched. If it is uncertain whether expert review is required, the RG Champion should project manage this process.

- Independent academic experts are selected. This can be done by consulting with an independent organisation with experience in this field.
- An information briefing will be prepared, providing a top-line summary of the product/concept/ issue to provide to the experts.
- A briefing will be provided to each expert asking for their advice, expert opinion and feedback in writing (either via email or, if necessary, a more formal report) on the following questions:
 1. Are you aware of any research that has been conducted in other jurisdictions which examines the impact of the product / concept / issue on player behaviour / awareness / attitudes? If you are familiar with such research, what were the results?
 2. Based on your knowledge and understanding of the product / concept / issue, do you believe the product / concept / issue will have an effect on problem gamblers either positive or negative and does the product / concept / issue correlate to problem gambling?
 3. Do you have any suggestions on responsible gaming features, initiatives or components that could be incorporated into the product / concept / issue that would make it more socially responsible?
 4. What is your opinion on whether or not this is a socially responsible product / concept / project / approach to undertake in the jurisdiction(s) in question?
 5. What are your recommendation(s) for next steps?

After all steps have been completed, the information collected should be synthesized into a report that reaches clear conclusions about the social impacts and net positive benefits, and makes recommendations about whether or not to proceed. The submitted report will be reviewed by the SRA Champion. Feedback on the report will be provided within seven working days of receipt.

Step 6 - Primary Research (as required)

If there are any issues of significance raised by Steps 1 through to 5, a decision should then be made to conduct primary research in the relevant jurisdictions to fully explore the social impacts of the product / initiative in question. This would involve a full research plan with clear outcome measures, an evaluation strategy and expert review of the approach. Once complete, the assessment will be submitted to the SRA Champion for review.

In order to pass a *Level C* Assessment, steps 1-6 must be completed and any identified revisions made to the project.

Appendix 3: Participants list

Organisation	Participant
Jan Annard	Ministry of VWS
Floor van Bakkum	Jellinek
Bert Bieleman	Intraval
Maris Bonello	Unibet
Malcolm Bruce	Abbots Barton Ltd.
Jolijn Fanoy	Kansspelautoriteit
Yvon Jansma	Center of Responsible Gaming
Dennis van Breemen	Ministry of Security and Justice
Joachim Haeusler	Bwin
Maarten Haijer	EGBA
Yvonne Hendriks	Novadic Kentron
Wolter van der Veen	AGOG
Frank Kastelijns	Van der Valk
Hans Keizer	Tactus Verslavingszorg
Alexander Loontjens	VAN Speelautomaten
Gert-Jan Meerkerk	IVO
Eva Miltenburg	Ministry of Security and Justice
Sanne Muijser	VAN Speelautomaten
Karin Nierop	Ministry of Security and Justice
Han Yang Nio	Ministry of Security and Justice
Tineke Ockhorst	Lotto
Eric Olders	D2D4
Wessel Oomens	Kansspelautoriteit
Jane Palles	Paddy Power
Pieter Remmers	Assissa
Ed Schunselaar	VAN Speelautomaten
Peter Seerden	Novadic Kentron
Hillevi Stuhrenberg	Betsson
Thomas Tuxworth	Betfair
Janny Wierda	Holland Casino
Rolf Slotboom	Pokerbond
Peter Vreuls	JHGroup

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