

**POLICY RECOMMENDATIONS ON
MEASURES FOR SELF – ASSESSMENT
AND PROTECTION AGAINST
PROBLEM GAMBLING BEHAVIOUR**

Context

On a global scale, the European market still remains the largest online gambling market globe. Its size, in terms of gross gaming revenue to be generated in 2018, is projected to reach the **€24,75 bn.** figure, thus keeping a high-growth year-by-year annual compound rate.

These impressive growth figures are developing in a context where online gambling is cross-border by its nature, taking place in a digital environment. However, **consumer protection measures remain fragmented** across Member States and tend to be state-centred, meaning there are **no common EU level strategy** applicable for gambling sector, with a consequence not all consumers may be sufficiently protected across the EU in terms of safety and fairness of gambling products.

Scope

Protection against gaming addiction is one of the [EOGL Responsible Gambling Strategy](#) three core principles. In addition to continuous trainings and education programs for our members' employees, as envisioned by the said Strategy, these Policy Recommendations aim to widen the scope of the Strategy, now introducing an approach that is **solely focused to the players themselves**. This approach provides the players with insights on the essence of gambling, its social role, but also on its potentially adverse impact for person's economic, social and personal welfare.

On a broader scale, these Policy Recommendations also stand for an Industry's sector-specific, internal regulatory response and a positive feedback in adhering to the [European Commission's 2014 Recommendations on Principles for the Protection of Consumers and Players of Online Gambling Services and for the Prevention of Minors from Gambling Online](#).

Following the regulatory guidelines as set by the said Commission's core Industry-related recommendation and the earlier-adopted [CEN \(European Committee for Standardization's\) Responsible Gambling Measures](#), the hereby presented EOGL Policy Recommendations introduce our members' commitment and contribution towards such **corporate standards** that would guarantee a stricter protection of online gambling consumers, secure a fair gaming environment and strengthen the CSR dimension of online gambling services within the EU Internal Market.

Purpose

As a more specified objective, the aim of this EOGL position paper is to promote a broader, EU-wide Industry dialogue and contribute in achieving a wide spectrum of **practical measures** that will ensure strict protection of EU online gambling consumers and deter, minimize and mitigate the emergence of problem gambling and social harm related with it.

The EOGL Responsible Gambling approach

For EOGL, responsible gambling is a concept which brings together series of policies and requirements for the Industry stakeholders in general – and our members in particular - to make sure they adhere to the highest quality standards and are offered a safe user experience from potential negative consequences of gambling. For our customers, this means an environment in which **vulnerable social groups** are particularly protected, **underage gambling** is a zero-tolerance issue, gambling offer is free from crime and fraud, personal data are processed and stored in full adherence to

the **GDPR** standards, and **advertising** is not misleading¹.

Gambling, as such, **should be** treated as a fun pastime and leisure and understood as a part of the European social and cultural heritage and a historic social phenomenon. **What gambling is not** and should never stand for is a reliable choice to generate steady and regular personal financial income.

Whilst the majority of the population is fully aware of that fact, and treat gambling as recreation while **depositing only what they can afford to risk**, for some² it can be more difficult, even impossible to resist to the prospects of another bet, even at the cost of their financial and social wellbeing.

Three pillars of minimizing the problem gambling risk - how our members approach the players when it comes to preventing gambling-related harm

For all the players enjoying our members' offer, the key to a successful and safe interaction with gambling line-up lies in implementing such responsible gambling approach which actively and efficiently prevents problem gambling issues before they even occur. As a matter of mandatory membership commitment, all our members internally institutionalize such approach and operationalize it in form of **internal corporate responsible gambling policy**.

¹ Pursuant to the 2014 Commission's Industry Recommendations, Sections 4, 11, 12, 26, 27, 39-45 and 49 respectively

² 0.1-0.8% of all EU players experience some form of problem gambling, assesses the ALICE-RAP EU-funded policy paper and research project, titled *Gambling: two sides of the same coin — recreational activity and public health problem*, available at http://www.alicerap.eu/resources/documents/cat_view/1-alice-rap-project-documents/19-policy-paper-series.html

The key for a successful policy of this kind lies combining the following three principles of customer interaction:

- **Information and advice**
- **Self - protection**
- **Self - assessment**

Information and advice

In order to keep gambling as a form of social pastime and entertainment, our players are advised to carefully balance how much time, energy and financial resources invest in this activity. Also, all our members' websites contain plain, legible and easily visible responsible gambling sections and messages, whereby all the necessary advice and information for further expert support is posted³. However, in order to prevent problem gambling issues from occurring and make sure bets are wagered on responsibly, we strongly recommend all our players to stick to the **following strategies of a responsible gambling behaviour**:

- Not to forget gambling is fun, not a job from which monthly income is generated
- Not to deposit more than they can afford
- To consider setting up time, deposit, win or loss limits

³ As envisaged by the European Parliament resolution of 10 September 2013 (P7_TA(2013)0348) on online gambling in the internal market, Section 22

- Not to chase losses
- Not to gamble during delicate psychological condition or under the influence of a psychotropic substance
- To compare time spent gambling in relation to other social activities
- To keep in mind that, regardless of the extent of skill, in gambling the outcome is always uncertain and based on odds (on the mathematical likelihood of which they are duly informed)

Self - protection tools

Before problem gambling symptoms even occur, a few self-protection measures to make sure gambling stays responsible in every moment are always at disposal. The latest Industry self-limitation tools at disposal to our players are **player limits**, **software content blocking** and **self-exclusion tools**. As a variant of limiting from excessive gambling, each player is therefore advised to predefine:

- a specific maximum amount of money that he can placed on a bet
- a specific maximum amount of money that can be lost on bets
- a specific period of time during which betting is disabled at their online account

Self-exclusion is a process in which a player can request their operator, an EOGL member, to exclude themselves from accessing gambling services for a specific or even indefinite period of time. During this period, player will not be able to place any bet,

regardless of the amount, time of attempted betting or betting type, on the website from which has been voluntarily self-excluded.

In addition, a software enabling our customers to block and filter web traffic in order to prevent minors from their family, work or social environment to reach betting and gambling web sites are also at disposal 24/7/365, namely:

- CyberPatrol
- SurfControl
- Net Nanny
- CYBERSitter
- BetFilter
- GamBlock

Self – assessment

Regardless, when asked themselves or by the environment, it is not always easy for a player to determine whether they or someone close to them belong to the category of players that have or are about to develop a gambling addiction. The answer to this question is not straightforward, as everyone approaches to the gambling addiction differently, of which EOGL is fully aware.

That is why we keep on reminding that, **in any case negative social effects outweigh the positive ones**, the time is right for considering further steps. In order to be able to confidentially and precisely ascertain whether this is the case, **self-assessment action is mandatory**.

This section of the Police Recommendations can also be understood as a useful and practical self-assessment **tool** and **questionnaire** by virtue of which a player may ascertain whether he/she has gambling problem. In case of a positive feedback, our members' customer support departments approach the player and direct him towards seeking expert help from professional advisors and treatment centres:

- How often do you deposit more than you can afford to lose?
- To which extent big money value deposits are vital part of your betting entertainment?
- How often had you kept on gambling for hours and all the way until you lost all the money?
- Do you tend to borrow money, sell property or miss to pay regular household bills in order to re-direct that funds to gambling?
- Have you ever attempted to win back the money previously lost on gambling?
- Do you feel physically or emotionally depressed during or after gambling?
- Do you tend to lose interest in other social interests and hobbies and devote more and more time to gambling-related activities and subjects?

Conclusion

The EOGL Policy Recommendations on Measures for Self – Assessment and Protection Against Problem Gambling, along with the [EOGL Responsible Gambling Strategy](#), represent first in series of **core-value documents**. This is also a part of the Organization’s strategic approach, as well as of all our members, to maximize efforts in achieving an optimum of sector-specific EU consumer protection standards, especially when it comes to protecting the minors and vulnerable groups. As four years have lapsed after the [EU Commission Recommendations](#) on online gambling consumer protection, our intent is to further encourage the intra-state cooperation on the issue, in light of rapidly changing technological environment in which online gambling in EU takes place.

We will also be advocating the need for introducing a more institutionalized approach towards monitoring the online gambling latest developments, in order to help the EU policy-makers identify trends and articulate affirmative policy responses, in line with [CEN’s Reporting Requirements](#)⁴ adopted earlier in the spring of 2018.

As material change in applicable regulatory framework occur regularly, the Organization shall conduct check-ups each time there accrue operational and legal grounds for the **revision** of this document.

⁴ The 456 CEN Technical Committee on Online Gambling Services, more information available at: https://www.cencenelec.eu/News/Brief_News/Pages/TN-2017-051.aspx