



RESPONSIBLE GAMBLING STRATEGY

I. INTRODUCTIONARY REMARKS

1. This document sets out the strategy of the European Organization for Gaming Law (EOGL) for encouraging **responsibility and accountability** in gambling, reducing and mitigating gambling-related harm, raising general level of information about the Industry and increasing the protection of the vulnerable social groups.
2. The Strategy envisages the cooperation with the **Industry's key stakeholders at the EU level** – operators, regulators, commissioning organisations, governments, trade bodies, treatment providers and number of other public agencies.
3. The Strategy uses **holistic risk approach**, as it addresses land-based and online sports betting. Risks and gambling-related harm can occur in both types of offer channels.

II. CONTEXT OF THE STRATEGY

4. **The EU gambling market** grows at the estimated **annual rate of 3%** and its annual revenue has reached the figure of **€100 billion**. Driven by rapid technological development and digitally provided services, millions of EU citizens are daily consumers of services, which are only a click away.
5. For vast majority of consumers, gambling is a daily **leisure activity**, part of the competitive culture deeply rooted in European societies. It is also the source of enjoyment, excitement and an opportunity for material gain. However, reasonable likelihood of financial loss is also part of the game, which can trigger various **harm risks** for small number of players, including the changes in every-day behaviour.
6. Several EU-supported studies have shown that as much as **2.2%** players per country are prone to developing some form of harmful and problem gambling behaviour. In relation to that, up to **0.8%** adults per country meet the criteria of a gambling disorder.

III. APPROACH AND OBJECTIVES

7. Notwithstanding these figures, simply counting the number of problem gamblers leads to underestimating the **true nature and social consequences** of gambling-related harm. The EOGL members are devoted to monitoring the emergence of any sort of individual or social negative effects. The harm, once the player loses full control over their user experience, is **not restricted solely to that individual**, but reaches out to their families, friends, communities as well as employers.
8. Being not only socially accountable and responsible, this approach is also the only guarantee for the sustainability of our members' **business models** and successful compliance to the complex regulatory framework.
9. In addressing this Strategy, EOGL aims to contribute in achieving the following **outcomes**:
 - comprehensive **scientific** understanding of the causes, consequences and parameters of gambling-related harm;
 - quality, understandable and transparent **facts and figures** about the nature of the Industry, its stakeholders, products and consumers;
 - effective and customized **information, advice and treatment** for at-risk or problem gamblers;
 - constructive and fact-based **cooperation** between the operators, regulators, medical institutions, universities, NGOs, governmental agencies and international organizations.

IV. KEY PRINCIPLES OF EOGL RESPONSIBLE GAMBLING APPROACH

10. The EOGL responsible gambling strategy adheres to the following principles:

- **player security**
- **game security**
- **protection against gaming addiction**

Player security

11. Each customer making a bet at our member's shops or websites is the subject of applicable national **consumer protection** laws. Any unclear customer terms & conditions, used to give the business an unfair advantage over the customer, is a zero-tolerance issue.
12. In each interaction, customers will be encouraged and helped to make **informed choice** upon placing a bet. This will be achieved by preserving the absolute **transparency** of odds, fairness and the random nature of the RNG-driven products. The latter will be closely and regularly monitored by independent certifying authorities.
13. Bonus and marketing **promotions** will not contain any misleading information on the probability of a win. Promo materials will not be attractive to minors or particularly vulnerable groups as absolute exclusion of both popular real or fictional characters popular at the minors will be implemented.
14. Our members process and store **customer data** pursuant to national legislation and the provisions of GDPR, taking into account both the legal obligations of operators and privacy rights of customers. This includes organization of **training programs** for all the members' employees on steps for proper implementation of the GDPR provisions.
15. As a matter of zero-tolerance, EOGL members strictly **prevent the minors** from getting in touch

or participating in gambling, either in betting shops or websites. These principles are mandatory part of all our members' **age verification** policies and the agenda of the staff training programs.

Game security

16. Keeping **the crime out of gambling** is EOGL's regulatory obligation and crucial part of our mission. Mitigating Industry's inherent risks related to money laundering and/or terrorist financing remains the priority, as gambling intersects with huge number of offer modalities, customer types, payment options and regulatory models.
17. By cooperating and exchanging insights into tools for identification, analysis and evaluation, we look forward to continue improving the level of expertise and the quality of **risk assessment tools**. We implement **integral risk assessment** approach in order to make sure retail and online gambling market remains a hostile place for any criminal wishing to exploit it.
18. Each EOGL member will make sure it meets the requirements of our **AML policies**, designed for alerting potential customer's attempt to wager the money acquired unlawfully. These requirements relate to the mandatory status of ML/TF risk assessments, customer due diligence checks, KYCs, customer affordability programs, reporting procedures and related employee trainings, **all regularly revised and enhanced**.

Protection against addiction

19. EOGL members will be organizing various **staff trainings** and education programs, in coordination with EU-based medical institutions and experts. They will be designed for all the members' employees in regular contact with the players and will rely upon medical expertise and advise the employees to contribute by behaving and reacting without any prejudices when faced

with potential problem gamblers. In comparative practice, such programs proved to be the most efficient in both preventing and tackling gambling addiction and problem betting behaviour, as shown by the project *It is possible to quit*.

20. Each offer channel will contain **information** relating to gambling-related risks, patterns of problem gambling behaviour and the counselling and treatment facilities at disposal, either via internet, banners, flyers, e-mail or telephone.

V. PRIORITIES

21. In achieving the above stated objectives and principles, the Organization will prioritize its actions in the following **priority action areas**:

- **Priority Action Area One: Scientific measuring of the gambling-related harm**

22. Gambling regulation and policies should be based on **scientific evidence**. Instead of only quantifying the number of problem gamblers, we will initiate and take part in scientific research focusing on exact identification, classification and quantification of harms associated with diverse gambling offer modalities, and what are their risks for the individual and the society. This will be achieved by analysing social groups, risk factors but also general features of gambling as a social activity.

- **Priority Action Area Two: Active cooperation with all the Industry's stakeholders**

23. Our members will be advocating the approach by which the organizations and individuals considered as **stakeholders will take part** in designing the measures for promoting responsible gambling.

24. This approach includes, but it is not limited to, communication campaigns and strategies, research proposals and joint action plans.
25. Upon future formulating and reassessment of the responsible gambling policies, EOGL will **intensively cooperate** with the medical experts and academics, regulatory authorities as well as NGOs.

- **Priority Action Area Three: Education**

26. Given the **young adults (18-25)** are the most vulnerable social group for developing at-risk or problem gambling behaviour, our Organization will strengthen its public presence through education in preventing or inhibiting gambling-related harm, designed for this age group.
27. Although an increased level of research is noticeable, **lack of EU-based studies** is a major obstacle and further research in this field is essential, especially in terms of independent research authorities.
28. We also look forward to organizing **staff trainings and educational programs** on latest regulatory and technology changes (data processing and storage in light of GDPR, enhanced AML/CTF procedures, *It is possible to quit* et al.), that are also to be intended for all the interesting parties (primarily consumers and stakeholders).

- **Priority Action Area Four: Public Engagement**

29. The Organization will put stronger emphasis to the views of players about their experiences. By setting up the **Responsible Gambling Day**, we will be informing the public and raising awareness on key Industry's features, its contribution to the economy, specific business model and regulatory framework within which it operates.

30. By fostering **EU-wide dialogue** about Industry's key points of reference, we will contribute in building the cooperation network with treatment agencies, policymakers, regulators and other stakeholders, as a means of public engagement, necessary for designing any future prevention or treatment interventions relating to problem or at-risk gambling.

VI. CONCLUSION

31. The EOGL Responsible Gambling Strategy represents core values and strategic business approach of all the Organization members. Each member will contribute, both individually and through the membership in EOGL, in designing a framework for monitoring and assessment of overall impact and progress made on all the Strategy's priority action areas.
32. The Strategy will serve as the Organization's contribution in establishing an EU-based multi-stakeholder cooperative network in pursuit of the Industry's common objectives and mission.