

STRATEGIES FOR DETECTING AND CONTROLLING ELECTRONIC GAMING VULNERABILITIES

BY MARK GRIFFITHS

A growing feature of global gaming expansion is the recognition that developing socially responsible guidelines and infrastructure is essential to enhancing the appeal and credibility of the industry. The current financial uncertainties serve to highlight the need for monitoring at-risk players, and especially to consider strategies minimising gambling harm before any who are susceptible become confirmed problem gamblers. Prevention, therefore, lies in the vigilance, adaptability and development of pre-emptive mechanisms in an increasingly high-speed gaming environment.



Based on the amount and type of consultancy that our research unit has engaged in over the last three years, one of the fastest growing and most important areas for the gaming industry is in the area of social responsibility and the protection of vulnerable players. Some of the guidelines and policies the unit has developed are outlined here (with particular emphasis on electronic gaming machines [EGMs], in conjunction with a number of gaming companies including Norsk Tipping (Norway), Nova Scotia Gaming Corporation (Canada), Svenska Spel (Sweden), Camelot (UK) and Atlantic Lottery Corporation (Canada).

We assume in this article that the mandate of most regulatory authorities is to protect players particularly those who are vulnerable. In addition, the mandate of those in the gaming industry is to sell games responsibly. As a consequence, individual gaming companies should also have internal discussions about the following:

- Consideration of flexibility in game design to allow for slower, entertainment-driven games versus rigid restrictions on maximum bet, maximum return-to-player (RTP), and minimum game duration.
- An examination of upfront regulation versus experienced-based regulation (i.e., registered actual player behaviour).
- Debate over a carefully considered upfront approach versus a market-led approach (i.e., giving players what they want).
- Introducing tighter regulations if games cause extensive problems or if responsible gaming tools prove inefficient.

Vulnerable players are here defined as any adult with either a biological, psychological/emotional pre-disposition to

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gamble excessively, or for those players whose personal circumstances may put them at a greater risk of developing gambling problems (e.g., low income individuals, those with co-morbid disorders, etc.) (Wood, Griffiths & Parke, 2007). It is also worth noting that our research has worked from the premise that well designed social responsibility measures have most impact on vulnerable players rather than those who are already problem gamblers.

In many ways, the most effective approach to minimising potential harm to players is to focus upon those vulnerable players who are at risk of developing gambling problems as many of the social responsibility measures may not have much of an effect if the person already has gambling problems. For this group, social responsibility comes mainly in the form of tertiary prevention measures (e.g., referral to treatment).

What follows are some suggestions that the gaming industry should think about implementing. For our purposes here, EGMs can include slot machines, poker machines, fixed odds betting terminals, video lottery terminals, and interactive video terminals.

Focus on entertainment rather than gaming – A focus on buying entertainment rather than winning money is recommended. When individuals primarily gamble to win money, and that is their only objective, that is when problems can start. That is when a proportion of vulnerable people can get into difficulty (Griffiths, 2007a).

Focus on prevention – Prevention and protective measures are to be recommended. Although it is a cliché, prevention is always better than cure. Therefore, by focusing responsible gaming initiatives towards vulnerable players they are likely to be more effective in reducing the development of problematic play in the first place.

Focus on privacy and data protection – Players should expect such a measure as an absolute minimum. They need to be assured that all data accrued from both volunteered information and behavioural tracking will remain confidential. Many consumers unknowingly pass on information about themselves that raises serious questions about the gradual erosion of privacy. Players can then be profiled according to how they transact with service providers. Linked loyalty schemes can then track the account from the opening established date (Griffiths & Parke, 2002).

When it comes to gambling there is a very fine line between providing what the customer wants, (i.e. enhancement) and exploitation. The gaming industry sell products in much the same way that any other business sells things. They are now in the business of brand marketing, direct marketing (via mail with personalised and customised offers) and introducing loyalty schemes (which can create the illusion of awareness, recognition and loyalty) (Griffiths & Parke, 2002).

As Griffiths and Wood (2008a) noted, on joining loyalty schemes, players supply lots of information including name,





address, telephone number, date of birth, and gender. As a consequence, gaming companies know players' favourite games and the amounts they have wagered. They know more about the gamblers' playing behaviour than the gamblers themselves. Some will send gamblers offers and redemption vouchers, complimentary accounts, etc. Supposedly all of these things are introduced to enhance customer experience. Benefits and rewards to the customer include cash, food and beverages, entertainment and general retail. However, more unscrupulous operators will be able to entice known problem gamblers back onto their premises with tailored freebies (such as the inducement of "free" bets) (Griffiths & Parke, 2002). It is recommended that gaming companies should not use the data they collect for activities that might be perceived as exploitative.

Development of guidelines for measuring player behaviour – Such guidelines shall state criteria for when player activity shall be stopped and whether or not a game is too problematic to distribute. Such criteria for when play is suspended should be developed in advance of the new games being introduced. Gaming companies need to consider what tools and/or mechanisms will be utilised in deciding whether a game is too problematic to distribute. Tools such as GAM-GaRD could perhaps be considered (Griffiths, Wood & Parke, 2008).

Use Player Card and Responsible Gaming Tools as central elements in developing a Responsible Gaming Platform – This is to be recommended particularly if social responsibility measures are at the heart of all gaming companies' gaming practices.

Player behaviour to be subjected to research – This is to be recommended on the assumption that the analysis of player behaviour will be used for protective rather than exploitative means. Further research using these data is also to be commended particularly if this is disseminated to other gaming companies and stakeholder communities.

Use socially responsible game monitoring tools – Such social responsibility initiatives have already been pioneered and introduced by other gaming companies (such as Svenska Spel with PlayScan). Systems such as these are likely to have a significant impact on the national and international gaming markets. If a players' behaviour indicates gaming problems it is recommended they should be deleted from the direct advertising address lists. Via such initiatives, it is also recommended that players should be offered control tools (e.g., personal gaming budgets, self-diagnostic tests of gaming habits, and the chance to self-exclude from gaming). The really innovative aspect of such technologies is that they predict future gaming behaviour. The use of such systems should be voluntary, but gaming companies should strongly recommend its customers to use it.

Development of Responsible Gaming Tools to increase player awareness and help players to make informed decisions – Ongoing development of Responsible Gaming Tools is recommended. This could perhaps be taken a stage further by sharing the outcomes of these developments with other gaming companies and stakeholders (as long as it did not impact on any commercially sensitive information).

EGM limits – There should be a maximum pre-agreed number of EGMs by gaming companies throughout a particular geographical location or jurisdiction.

Staff training – Gaming companies should be required to offer relevant training to vendors. Ongoing staff training around the area of social responsibility should be given at all levels to all those working in the gaming industry (Griffiths & Wood, 2008b) – including the vendors. Awareness raising of such issues is a necessity to enable staff to deal with relevant situations. Staff training should be ongoing particularly because of (a) staff turnover and (b) the growing amount of empirical research in the gambling studies field.

Customer support in handling problem gamblers – Gaming companies should be required to educate its



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The International Gaming Awards are back and now accepting nominations for the 2009 event - for full details go to our website.

Read what last years winners had to say about the awards:

James Packer, Executive Chairman of Crown Limited, Co-Chairman of MPEL commented:

"We are delighted that Crown Macau has received this international accolade. It is indeed an honor for Crown Macau to receive this prestigious award."

Luke Alvarez, Co-CEO of Inspired Gaming Group commented:

"The Gaming Awards' status as the pre eminent platform for recognising excellence within our industry makes them a natural choice for Inspired to show case our innovations of the past year, and to celebrate the hard work of all at the company. The awards do a fantastic job in raising a substantial amount of money for worthy and deserving charities, and Inspired is proud and honoured to form part of this special occasion".

Tim parker, sales director at progressive gaming commented:

"We are delighted to have been awarded the Gaming Awards best technology manufacturer for 2008. The timing is ideal as at this years ICE exhibition we have showcased new and exciting technology such as our RFID technology for roulette, which has been very well received by customers. To receive the recognition at the Gaming Awards for our achievements is fantastic and I would like to thank everyone who voted for us".

Paul Herzfeld, CEO Casinos Austria commented:

"We feel very excited and exhilarated to have won the award for the best Casino Operator in Europe. It is a wonderful recognition and we are very proud".

Lawrence Ho, Co-Chairman and CEO of MPEL commented:

"We saw a niche existed in Macau for a world-class contemporary and non-traditional luxurious hotel casino aiming to provide a six-star experience to VIP customers," said Ho. "Crown Macau is actually a collective result from various designers, and I would like to take this opportunity to thank the designers and architects who helped to bring my ideas and vision to reality. Needless to say, this award also proved that all our efforts did not go in vain,"

Flip Dötsch, Holland Casinos commented:

"Holland Casino is very proud of the nomination for Socially Responsible Casino Operator of the Year. Holland Casino has adopted the tenets of Responsible Gaming Policy (RGP) within its strategy, in order to render the organization's place 'at the centre of society' visible to all. In practice, RGP means that a company gives form and substance to its social role by helping to resolve one or more social issues. It is therefore an inherent part of the government's remit to Holland Casino, which may be summarized as: to protect the player, to prevent and reduce problem gambling and to fight illegal gambling and crime. The Responsible Gaming Policy provides an excellent example of how Holland Casino fulfils its social responsibility. While Holland Casino offers every opportunity for those who wish to engage in casino gaming, it also takes measures to counter the potential adverse effects of gaming".

Gavin Isaacs, COO Bally Technologies commented:

"We feel very honoured and excited to have won two awards. We are only just re-inventing ourselves in Europe so this is a great start".

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customer support staff in handling enquiries regarding problem gamblers. Such training must be updated every two years. Staff should also be able to identify aspects of policy and practice relative to appropriate intervention that will contribute to minimising the harm attributable to uncontrolled gambling.

Mandatory information about problem gambling – At the core of exercising a duty of care lies the principle of assisting players to address any concern about their gambling. For instance, telephone helplines and addresses of helping agencies should be displayed on posters, leaflets, and on the back of lottery tickets or smart cards. Information should be freely available without having to ask a member of staff and should be placed in areas of high accessibility (e.g., a poster in a toilet, leaflets at the exit door). Gaming companies should also have a good referral system with local and/or national helping agencies (Griffiths & Wood, 2008b).

Implementation of sanctions – Gaming companies should have guidelines and sanctions against vendors who fail to report or prevent minors playing with borrowed or stolen player cards.

Use of responsible gaming tools – Gaming companies should voluntarily encourage players use Responsible Gaming Tools. Such tools are about empowering people to make their own choices rather than the players being forced to do something. Of course, the provincial authorities may demand that these are mandatory, in which case you will have no option.

Mandatory self-exclusion programme – The option for self-exclusion should be offered to any player that requests it and is a good demonstration of a company's 'duty of care' towards its clientele. Care needs to be taken on the length of self-exclusion and the criteria for re-inclusion. It may also be worth noting that self-exclusion measures can also be useful for social gamblers who may not want to spend money in a particular month (e.g., December when there are Xmas presents to buy) or at a particular time of the month (e.g., the week preceding 'pay day' at work).

Mandatory game breaks – Continuous EGM games should feature a mandatory break every 60 minutes during continuous play. This measure inhibits continuous play and allows players to have a reflective 'time out' to think about their gambling during this 'cooling off' period (Griffiths, 2007a).

No credit policy – It is recommended that the vendor is not allowed to offer credit to players as they should not be able to gamble with money they may not have. Customers should always be advised against gambling with credit and only gamble with funds from their bank account. When borrowed money has already been secured, its availability is difficult to resist for gamblers who have experienced continued losses. It is highly likely that such money will be used to chase losses. Credit cards themselves are designed

to make customers over extend themselves' financially.

Minimum age limit for playing interactive games is 18 years and controllable age enforcement – EGMs must be placed indoors in controllable facilities where age limits can be enforced. The facility must be permanent. Children and adolescents need to be protected as research worldwide demonstrates that children and adolescents are one of the most high-risk vulnerable groups (e.g., Griffiths, 1995; 2002; 2003a). As a consequence, age limits should be mandatory. Although some countries (such as those in North America) have minimum age limits of 21 years for access to gambling, 18 years appears the most appropriate (especially when compared to most other European countries).

Age limits should also be in place as research has consistently shown that the younger a person starts to gamble, the more likely they are to develop a problem (e.g., Griffiths, 1995; 2002; 2003a). Griffiths and Wood (2008b) recommend that operators or their agents should prominently display the minimum age of entry and not make external premises attractive to youth.

There should be a sufficiently controlled and supervised point of entry to make underage gambling difficult. This means that EGMs should be prohibited unless they are supervised and/or in an area that no minor has access to. Griffiths and Wood (2008b) also recommend there should be strict sanctions for those operators or individuals who are caught allowing minors to gamble. In summary, gambling should be restricted to well-regulated, age-controlled, properly supervised specific gambling venues where staff members understand issues relative to gambling.

Monitoring of EGMs – EGMs must be placed so that the vendor can continuously monitor playing activity. Ideally this should be dedicated staff who oversee which clientele are playing.

Vendor evaluation – There shall be an individual evaluation for each vendor in terms of eligibility and placement. Ideally, EGMs should not be placed the following places: (a) typical grocery stores, (b) common areas in shopping malls, commuter stations or traffic terminals, and (c) aboard transportation vehicles. This provides a more centralised gaming model where people can play on EGMs at age-regulated establishments (e.g., bars) and dedicated gaming environments. There are other issues that may have to be considered such as the mix of alcohol and gaming if EGMs are placed in alcohol-licensed establishments.

Advertising and promotion – Quite clearly it is appropriate that the gaming industry needs to advertise and promote its facilities. In addition to conforming to each country's own advertising codes of practice, the most important recommendation would be that advertisements and promotions should not appeal to vulnerable individuals (such as minors, those with severe learning difficulties, problem gamblers, etc.).



Industry compliance to codes of conduct – Operators within the gaming industry should adhere not only to government regulators but also to the codes of conduct and practice formulated by their trade associations. Furthermore, all personnel should be made aware of and understand the codes.

Information about staying in control – Although players are clearly responsible for their own gambling, they should still be reminded of the need to exercise control. Information in the form of posters or leaflets should highlight the need to stay in control (e.g., “Bet with your head, not over it”) and be prominently displayed where it will be seen by players (e.g., next to the EGM).

Pop-up windows – Another socially responsible strategy might be for EGMs to have a non-intrusive but clear pop up window that appears after pre-determined periods. It is advisable to ask the customer if they wish to continue so that they must read and acknowledge the time and the duration of their play. Gambling can create and maintain dissociative states where customers can lose track of time and duration of gambling (Griffiths, Wood, Parke & Parke, 2006). Therefore, actual information regarding these two factors needs to be periodically recognised consciously.

Develop guidelines for responsible gaming development in collaboration with recognised research communities – This is to be recommended as it shows a serious commitment to social responsibility by gaming companies and includes an element of external audit and external review. Gaming development can include many levels from initial design through to how they are marketed. Although gambling behaviour can be influenced by a person's individual risk factors (e.g., genetic predispositions, personality factors, social environment in which the person was raised) (Griffiths, 2006; 2007), gaming operators have responsibility for the

ways in which players are attracted to play on their products (e.g., ease of accessibility in gambling, advertising to attract custom, incentive bonuses to gamble), the design of their environments in attracting people to gamble (e.g., the use of light, colour, sound and music in gambling venues), and the design of the gambling product itself (e.g., game speed, prize structure, jackpot size, and illusion of control features on a slot machine). Games on EGMs should be designed to limit excessive play in environments designed for customer enhancement rather than customer exploitation (see Griffiths, Wood, Parke and Parke [2007] for some initiatives to help in this area). **CGI**

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