



A QUARTERLY INDUSTRY  
REPORT FROM  
GAME ON & GHOSTFOUNDRY

# Innovation in Responsible Gambling

The logo consists of a red speech bubble with a white circular icon containing a stylized 'G' and a play button symbol. To the right of the speech bubble, the words "GAME ON" are written in a bold, white, sans-serif font within a red rectangular border.

**GAME ON**

ghostfoundry



INTRODUCING

# ReportOn

*ReportOn is a new initiative from GameOn, the leading PR, marketing and social media agency serving the global online gambling industry, and content marketing agency, Ghostfoundry.*

*ReportOn is a free, quarterly report that breaks down a topic or trend into key talking points with contributions from a wide range of industry stakeholders.*

*The aim is to bring these topics into the spotlight and kick-start discussions around what are often complex issues with thoughts and opinions from the greatest minds in the industry.*

*We hope ReportOn will ultimately provide a meaningful contribution to wider conversations around how we can drive the sector forwards and continue to remain at the cutting edge.*

## **Reporting on: Innovation in responsible gambling**

*The inaugural ReportOn focuses on the hot topic of responsible gambling and asks whether the industry is doing enough to innovate in this area.*

*According to a recent study by GambleAware, the answer would appear to be “no”.*

*The charity’s Behavioural Insights Team has just published a study which found that safer gambling tools lead to fewer customers setting deposit limits.*

*Rosanna Barry from the Behavioural Insights Team said that while deposit limit tools have the potential to deliver benefits, “innovation and development has been lacking”.*

*That is perhaps a touch harsh on an industry that has made strides in the last decade but in particular over the last 12-24 months.*

*Of course, there is always room for improvement and the majority of stakeholders would agree that the wider industry could be doing more.*

# Contributors include:



Leigh Nissim/CEO & Founder  
Future Anthem



Michael Golembo  
SkillOnNet



Achilleas Chrysafis/Head of Platform  
FSB



Eduards Jakubov /Head of Responsible Gaming  
Betsson Group



Allan Auning-Hansen/CEO  
CEGO



Victoria Reed/Co-Founder  
Better Change

# Responsible gambling and where we are at:



*Barry's comments provide a great starting point for this discussion and frames the first question we put to the contributors to this issue of ReportOn...*

## **Is the industry making enough progress when it comes to responsible gambling?**

### **Future Anthem:**

Rightly so, responsible gambling processes are under greater scrutiny than ever before. The industry has come on in leaps and bounds in this regard in the last ten years, accelerating its pace of improvements in the last 24 months. Culturally, there is a strong alignment across major stakeholders, although there are pockets where improvements can still be made.

### **FSB:**

Yes, the industry is making enough progress. While the starting point was low, I think we have seen some great progress in the last few years industry wide. From our side, our overall management of responsible gambling, the customer journeys involved in that and looking out for potential problem behaviours has increased tenfold. Today, it is very much a key part of our operations.

### **Better Change:**

I liken the responsible gambling situation to that of diet and exercise. No one wants to be overweight and unhealthy, but we can all push ourselves more to do what we know is the right thing. It's the same for operators. It is not healthy to have problem gamblers on the books and it's certainly not good for business.

So, while I think they don't get enough credit for the work they're already doing, it is true that they could always do a little more.

### **Betsson:**

Our viewpoint is that operators have actually made tremendous progress when it comes to responsible gaming. As a tier one operator, I am pleased to see how similar operators care about customers and have invested heavily in responsible gambling.

*It seems the consensus is that tremendous progress has been made over the past decade and especially in the past two years.*

*Of course, there is always more than can be done **but what is stopping operators from innovating around responsible gambling and safe gaming?***

*The patchwork approach to regulation and licensing is certainly a contributing factor.*

#### **Future Anthem:**

While there is almost universal commitment to offering a safe gambling experience for players, the levels of operational and financial commitment differ significantly between geographies and largely as a result of the regulations. The UK is clearly the most advanced in this regard, with other markets following at various stages of maturity when it comes to responsible gambling.

*But the size and available resources of the operator also plays a part.*

*Large operators are perhaps better placed to implement some of the best safe gaming practices due to the size of available budgets, depth of resources and lower proportionate revenue exposure to high-risk players.*

*But even for some of the biggest brands in the business, being compliant with the different regulations in different markets requires tremendous resources.*

#### **Betsson:**

As a multi-brand/multi-market operator, we need to consider certain elements of regulation that are different in each market – if we don't, it is just not going to work.

Inevitably there are always differences – of which we wish there were less of – but the truth is that every regulator manages to come up with a specific process which ultimately has the same result as in other jurisdictions.

*Another argument is that operators are simply not incentivised to push the boundaries when it comes to responsible gambling and safe gaming.*

*In the UK, for example, they are mandated by the Gambling Commission to allocate funds to help promote responsible gambling but are heavily constrained in the way these funds are directed.*

*This is something Reed and Better Change call a “polluter pays” strategy and one that does not encourage operators to go above and beyond their licence obligations.*

#### **Better Change:**

The UKGC now only counts as a ‘RET contribution’ those funds that are directed to organisations on their approved list. Once on that list, there's plenty of funding available but surely also a risk that providers just stick to doing what they do, and stop innovating.

On the other hand, new entrants to the field, like Better Change, may have the energy, inspiration and imagination to develop new tools and approaches to Safer Gambling, but operators won't get any credit from the regulator for supporting them.



## Regulated market or not – should it make a difference?

**FSB:**

It does, but it shouldn't. Take Ireland, for example. Only now are some of the bigger operators signing up to what is a voluntary scheme to manage responsible gambling as there is no central gambling commission or regulator in the market at present.

*The global online gambling industry is renowned for its ability to innovate and push the boundaries and there are some truly great examples of this relating to responsible gambling.*

*While some operators and suppliers are committed to constantly developing safe gaming tools and processes, buy-in from all stakeholders is required for true progress to be made.*

***But if this does not happen, what will it mean for the wider industry?***

## The risk of status quo

*The industry has undoubtedly made tremendous progress over the past decade but now is not the time for operators, suppliers and indeed regulators to take their collective foot off the gas.*

*Progress must be constant if players are to be protected to the highest possible level and to also ensure that regulations do not tighten to the point where the industry can no longer grow.*

*This is the risk of the status quo.*



**FSB:**

The industry still doesn't have the best reputation at this point in time and while that stems from historical cases, I can't imagine that the pause button will be pressed on the great progress made over the past five years. Make no mistake, there is still more to do in areas like affordability levels.

The situation continues to evolve and at FSB we are committed to freshening up our tools and services that we offer customers when it comes to responsible gambling.

## On the subject of affordability

Affordability is an area the UK Gambling Commission keeps coming back to; affordability checks are one of several key issues being evaluated in the government review of the Gambling Act 2005.

One proposal put forward would set a monthly net gambling loss of as little as £100 with bettors having to prove their income if they wish to gamble beyond that loss level.

The proposal caused concern across the industry and from the horse racing sector, with leaders warning the sport would lose up to £60m a year as a result.

What affordability checks will ultimately be required remains to be seen, but it is clearly an area of focus and one that operators should be considering ahead of any changes.

This is what Allan Auning-Hansen, CEO of CEGO – the operator behind Spilnu and Lyckost – had to say about affordability...

## **CEGO:**

While operators have come a long way when it comes to responsible gambling, few have successfully explored the area of affordability and accurately estimating and/or understanding a player's ability to fund their gambling activity. This is a huge challenge to overcome; the process needs to be automated without interfering with the sign-up process.

There are some solutions already in the market, such as BeBettor, but they are local and as an operator you really need a single solution that works across all of the markets where you are active.



## **Future Anthem:**

Additional regulations will land if the industry does not show continued progress in sustainable gambling, often with blunt instruments and poor execution. That being said, the Future Anthem team is optimistic; we believe that the advent of new technology and the consequential opportunity to personalise responsible gambling experiences in real-time should allow the industry to stay ahead of the game, delighting players as responsible gambling practices evolve.

## **Better Change:**

Regulators have increasingly high expectations about what can be achieved by operators in terms of knowing their customers and understanding what level of gambling is affordable and sustainable for them.

If the regulated industry fails to meet these expectations, and more cases come to light of customers being allowed or even encouraged to gamble unsafely, then more onerous requirements will be the consequence.

Unfortunately, until the majority reach the level of the best, we will continue to hear the horror stories and the regulators will continue to be justified in increasing their demands.

***But what exactly are the best doing to drive innovation around responsible gambling?***



# The innovators and forward thinkers

*In any industry there are organisations that move the needle and set the standard for others to follow. The online gambling sector is no different and certainly when it comes to safe gaming.*

*The contributors to this ReportOn have been chosen because they are innovating around responsible gambling, and this is what some of them are doing to better protect players.*

## **Betsson:**

We are putting a lot of focus into our Responsible Gambling Prediction Tool which we are currently in the process of updating to version 2.0.

We believe that the combination and synergies between using new technology/machine learning and human monitoring is the way forward and we have invested in both.

The new version of the tool will be able to take into account even more factors and detect/provide predictions at an even earlier stage.

Our many years of experience in this field, together with all the historical data collected, gives us the opportunity to use all this information for the benefit of the player – and ultimately that’s what counts.

We are also investing in our people and are always trying to find new ways to share knowledge and train our staff as responsible gambling must be at the foundation of any business and at the heart of its culture.

The impetus of this can be proven by the fact that in the latest internal survey, 93% of Betssonites say that they believe Betsson Group is a responsible operator.

**93%**

of Betssonites say that they believe Betsson Group is a responsible operator.

## Innovation around responsible bonusing

You can't talk about responsible gambling without mentioning bonussing. In a growing number of regulated markets, increasingly stringent bonusing rules are being applied.

This is perhaps no more so than in Sweden where operators can only offer a single bonus on sign-up. So what are operators doing to retain players without bonuses while still prioritising responsible play?

Auning-Hansen shares his thoughts.

**CEGO:**

When we look at retention as a discipline in Sweden of course the one time only bonus limit sets some barriers. So we combat churn in a multiple ways.

First, our platform and unique games perform retention by design - you can **ONLY** play our games on Lyckost and this is key. What's more, our games are filled with gamification, exiting themes and thrilling bonus games that gives the player entertainment and not only potential money gains.

The players return for the gameplay, and we focus on extending the experience to gain the love and loyalty of our player base. Moreover, we have a low bet limit, which secures a long playing time for just a few bucks. Of course, this also drives stickiness; players become more loyal as they play and learn our games over time.

Second, we focus on continual game launches, so the player always has something new and exciting to return to. Our platform never sleeps with frequent launches of new titles, game modes, game verticals - we recently launched bingo with great success - and just an ever-moving product that features a pristine entertainment selection.

Thirdly, we keep our TV, social and digital marketing fresh, always striving to inform players of new features and possibilities and providing social content that engage and inspire lifetime loyalty.



### **SkillOnNet:**

We have stringent measures and tools in place to protect our players and ensure their experience on our sites are fun but safe. We are also trying to go above and beyond the basics. For example, we recently launched a new tool – Safemate via PlayOJO – which allows customers to track how much money they have spent, won or lost as well as how much time they have played over the last six months.

If a player is potentially at risk, they are given personal feedback and tailored communications to help prevent problem gambling from occurring. This is just one of many measures we have in place, including trained safer gambling agents on hand 24/7, account self-assessments, affordability checks and time limits.

### **FSB:**

There is a lot of interesting background work going on at FSB with regard to responsible gambling and anti-money

laundering and we are constantly looking to improve in this area. Expect more visible changes, more pop-ups, more interactions and enhanced tools.

### **Future Anthem:**

Designed with the latest regulations at its foundation and using well researched “markers of harm” at its core, Anthem Safer Play uses bet-level data to provide an in-depth assessment of problem gambling behaviour to detect risks directly from in-game activity.

Armed with advanced machine learning models that cluster players in a multidimensional space, Anthem Safer Play helps operators reduce false positives and pinpoint interventions to ensure optimum operating efficiency and effectiveness in reducing harm.

## **Operators want happy and healthy players**

*The best operators commit to socially-responsible business practices not simply because they are mandated to but because they believe it is the right thing to do. But regulators are often cynical about their motives.*

*Reed believes they should be more willing to accept that operators are doing the right things for the right reasons.*

### **Better Change:**

Regulators may be cynical about operator motives, but they are mistaken if they think everyone working in the gambling industry wants to destroy lives in the interests of maximising profit.

Responsible gambling initiatives impact the bottom line – employees devoted to it are part of the overhead but don't bring in revenue.

Unregulated gambling operators, and even more so black market operators, will not make this investment and so I'd see regulation as a first base ensuring that gambling is operated in a socially responsible way.



## AI could be a game-changer

### Future Anthem:

Our Game Data Science approach to Safer Play means that we can monitor game sessions and our AI predicts and classifies player behaviours in real-time. As such, our algorithms are able to spot risky play before traditional responsible gambling practices.



**"AI could be a game-changer"**

*These innovations are all well and good, but it begs the question **what impact are they having on responsible gambling and are players better protected as a result?***

### SkillOnNet:

Our efforts have had a very positive impact; our players are playing in a very protected environment. Indeed, their gambling habits are constantly monitored via the best in industry standard tracking tool, Mentor, and they are interacted with in real-time to guide them to understand their behaviour so they can decide if they consider it problematic.

These interactions are constantly evaluated and tweaked for effectiveness. We also have trained Safer Gambling agents working 24/7 to carry out one on one interactions which compliment Mentor.

## What is Mentor?

### SkillOnNet:

Mentor is developed by Neccton in collaboration with behavioural scientists and psychologists. The safer gambling tool tracks player data, detects risk patterns, changes in behaviour and flags signs of problem gambling. The tool appears in the casino client so essentially players can monitor their spending habits and do a self-test providing a risk score to establish whether their playing behaviour is ok for them or not.

### FSB:

Without doubt, a lot of things we have in place now have stopped customers spending beyond their means. We have blockers in place to protect customers from spending, depositing and losing more money than they can afford. We've found that communication is key, and we regularly interact with players via our dedicated responsible gambling team. If we feel there is an issue, we will force exclusion or account closure.

### Future Anthem:

Here are some headline stats from operators using Anthem Safer Play:

- More than 70% of players are identified before they use a responsible gambling tool
- 85+% of players are identified more than a week before a player or operator exclusion
- More than 60% of players are found first when compared to traditional responsible gambling models
- 92% of players identified more than a day earlier



# Final thoughts on responsible gambling and innovation



*On balance, the industry has made strides in the past few years when it comes to safe gaming and responsible gambling but we are not there yet.*

*The majority of stakeholders are committed to improving standards – and for the right reasons – and some are driving genuine innovation in this area.*

*It will take time for standards to improve across the board, but so long as progress continues to be made and levels of protection rise, that is all that matters.*

*Indeed, could it be argued that **responsible gambling offers the greatest opportunity for innovation?***

## **SkillOnNet:**

Absolutely. We are one of the main industries that has the capacity and tools to use data, customer knowledge and information to innovate and create new tools and measurements needed to help solve problem gambling and help customers gamble responsibly.

## **FSB:**

Yes. It is only in the last half-decade that the industry has got a hold of responsible gambling, so without a doubt there is scope to innovate as regulation and society itself evolves with regard to safe gaming.

While legislation guides us, we wholeheartedly embrace the opportunity to innovate in this area.

## **Better Change:**

Beyond the basic tools of player education and self-exclusion, the science of responsible gambling has a lot of scope to develop. Self-limiting tools have been around for some time in the online space but are being applied more and more to retail settings. Algorithms also have their place (despite getting a bad name recently) when it comes to identifying customers worthy of individual care and attention from the mass of data being collected all the time.

## **Future Anthem:**

The gambling industry is a tremendous combination of technology, entertainment, risk, regulation, ecommerce, finance and social interaction. Data runs throughout. As such, we would suggest that data provides the greatest opportunity for innovation and should be applied across the industry to improve the player experience responsibly for everyone.



# Final thoughts from GameOn and Ghostfoundry

*The vast majority of industry stakeholders are committed to responsible gambling and constantly raising the bar when it comes to protecting players.*

*Of course, there are challenges when it comes to innovating around safe gaming, but the contributors to this report are proof that tremendous work is being done to overcome them.*

*Making genuine and lasting change does not happen overnight but it is reassuring to see so many companies investing in the next generation of technologies, tools and processes.*

*This will ultimately lead to players receiving unprecedented protections when gambling online. Sure, more can always be done but the industry should also be praised for the progress made to date.*

## **About GameOn & Ghostfoundry:**

GameOn is the iGaming PR and marketing agency that takes as much pride in seeing its clients succeed as it does in itself. The GameOn team earns attention for your brand and business and works hard to raise your profile so that you can be heard above the noise being made by your competitors. GameOn is your agency and what matters to you, matters to the GameOn team.

Contact GameOn Marketing:  
Sarah@gameon.im

Ghostfoundry is a content marketing agency that specialises in the global online gambling industry. We work with operators, suppliers, affiliates and other agencies to take your content activity to the next level. Our industry reports have proved to be a big hit with our clients, allowing them to showcase their knowledge and expertise with industry peers.

Contact Ghostfoundry:  
Martyn@ghostfoundry.com



**GAME ON**

ghostfoundry