making responsibility real
Managing a Research Collaborative: Challenges and Outcomes

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- **Largest** publicly listed **online gambling operator**
- Listed among the **FTSE 250** of London Stock Exchange
- **3,000 employees** on **3 continents**
- Major player in all **regulated European online gambling markets**
- More than **3 million unique active players per year**
- Online gaming **licenses in 8 jurisdictions**
- **Compliant with public player protection standards** (CWA 16259, eCOGRA, eGAP)
- **E-money license** and **IT process safety** comparable to a bank institute (ISO27001, PCI DSS)
- **Network of cooperation** with **research institutes** and **counseling providers** in all European core markets
What do we actually know?

What do we actually know about this young man, playing a slot machine?
Account-based gambling

The technology of the Internet enables us to **monitor and save all gambling transactions** in real time and link them with a player account, which again is linked to an ID verified person.

- Gambling **frequency** and **volume, gradient and patterns** (based on 10,000 financial transactions per second)
- Customer **correspondence** in written form (based on 250,000 customer contacts per month)
- Navigation on our **websites**
- Usage of **responsible gaming tools**
- Usage of **payment methods**, patterns in **deposit and withdrawal behavior**

And we wanted to know, how we could use this plethora of data to **guide our consumer protection**.
Collaborative with the Division on Addiction

The collaborative set off in 2005 and since then produced 18 peer reviewed publications, leading to a paradigm shift in online gambling research and which allowed us to establish an evidence-based consumer protection concept.

Goals:

- Creating a **scientific evidence base** about actual online gambling behavior, relying on behavioral data

- **Continuously evaluating** games and player protection measures and designing a consumer protection concept based on this evidence

- Creating an early-detection model for the **identification of customers at-risk of developing problems**

Transparency:

- **Full access** to de-identified gambling transaction data of large samples (up to 100,000 customers), monitored over several years

- **Datasets** are made available to the global research community by means of the Transparency Project.
Collaborative with the Division on Addiction
## Approaches to consumer protection

<table>
<thead>
<tr>
<th></th>
<th>Self-responsibility model</th>
<th>Imposed protection model</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relies on ...</td>
<td>informed choice</td>
<td>imposed protection</td>
</tr>
<tr>
<td>Example ... (Player limits)</td>
<td>Players must be informed and pre-commitment tools must be offered.</td>
<td>Uniform safe gambling limits are imposed on all players.</td>
</tr>
<tr>
<td>Shortcomings ...</td>
<td>Players, who are unable to take protective measures themselves, are unprotected.</td>
<td>The majority of players is overprotected.</td>
</tr>
</tbody>
</table>

Necessity for individualized player protection
Individualized consumer protection based on a Public Health model

- **Moderate gamblers**: 95%
- **At-risk gamblers**: 4%
- **Problem gamblers**: 1%

**Universal Prevention:**
- Informed Choice
  - Responsible Marketing
  - Information & Awareness
  - Self-assessment
  - Transparency & reality checks

**Selective Prevention:**
- Supporting Control
  - Time & expenditure limits
  - Monitoring
  - Partial self-exclusion
  - Self-help tools

**Indicated Prevention:**
- Protection
  - (Self-)exclusion
  - Referral to healthcare
Informed Choice: Information & Awareness

Responsible Gambling website, directly on the gambling portal. Always just one click away.
Informed Choice: Reality Checks

Due to the account-based nature of online gambling, we provide players with:

• their account balance in real currency denomination on the header of the gambling website

• a comprehensive transaction overview ("bank account statement")

• server timer
Supporting Control: (Self-)limitation

The purpose of pre-commitment measures like self-limitation is to remove expenditure decisions from the point-of-sale.

To do so, players can in advance impose daily, weekly or monthly deposit limits – any deposit in excess of the limit will be rejected.

Problem:
Players increase their limits during a hot phase, and even though they can not use the increased limit during the hot phase, it remains at a level which is potentially too high for the player.
Self-limitation functionality

Problem:
Increasing the delay actually does not resolve the conceptual problem.

Customer demands increase of limit

Increase becomes effective

7 days
Self-limitation functionality

Other self-limitation approaches do not hold true to the goal of removing expenditure decisions from the point-of-sale.

This goal can only be attained if there is a secondary delayed confirmation step.

As a consequence 88% of all limits remain at the level initially imposed by the player.

Customer demands increase of limit

Increase becomes effective

Ask customer for verification

3 days
Protection: (Self-)exclusion

Self-exclusion in the Internet is often assumed to be perceived by players as less daunting and therefore often used as a measure to prevent future problems.

However this is how it often looks like in practice:

Close my account

If you click this button, you will lose all privileges…
…and we will never ever accept you back as a player…
…and you will be put on a national blacklist…
Protection: Self-exclusion

Based on the findings that players in the process of self-exclusion are often able to rationally decide, we intended to provide players with choice of options to select the most appropriate, maximizing protection while minimizing the threshold.
Service Closure

If you want to stop playing for a while or indefinitely on any or all products we offer, you may do so using the options below. If you want to self-exclude yourself because of problematic gambling behaviour, please visit our [Self Exclusion pages](#).

Once you close a product,

- you will no longer be able to play with real money on the products you choose to close.
- you will no longer be able to collect Market Points on the products you choose to close.
- you will no longer be able to access our Market from the products you choose to close.
- you will no longer be able to make deposits in case you close all available products (withdrawals are still possible).
- your closed product will be reopened automatically as soon as the time period you set for the closure expires.
- you still have an option to reopen the products before the date you specify as closure end, given the minimum duration of 24 hours is expired.

In order to finalise the closure of your selected product(s), please select the duration and the main reason for closure.

<table>
<thead>
<tr>
<th>Product</th>
<th>Current status</th>
<th>Closed until</th>
<th>Earliest date to open</th>
<th>Modify status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Casino</td>
<td>open</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Poker</td>
<td>closed</td>
<td>4/26/2013 12:00 AM</td>
<td>4/20/2013 8:19 AM</td>
<td></td>
</tr>
<tr>
<td>Race bets</td>
<td>open</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Sports bets</td>
<td>open</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
</tbody>
</table>

[Open all] [Close all]
Self-exclusion

Select the period you wish to exclude yourself for:

- 1 week
- 1 month
- 3 months
- 6 months
- until 23 Apr 2013
- indefinite self-exclusion (minimum duration 1 year)

Please select one or more reasons for the self-exclusion:

- I spend too much time playing
- I gave away too much money
- My playing has negative impact on my family and friends
- My playing has affected my work
- My playing has negatively affected my physical health
- My playing has negatively affected my mental health
- I do not wish to provide an answer

Exclude me  Cancel
Creating an early detection model

Tracking and analysis of behavioral indicators for early detection of gambling-related problems allows for an **individualized pro-active consumer protection**. The earlier emerging problems can be detected, the smaller the resulting harm.

**Pre-Conditions:**

- Account based gambling (Identification of the player)
- Database, recording all transactions of the player in real-time
- Scientifically generated prediction algorithm, validated for multiple criteria for gambling problems
Creating an early detection model

Gambling behavior
Braverman & Shaffer (2010)
LaBrie & Shaffer (2010)
Gray, LaPlante & Shaffer (2012)

Sensitivity: 74%
Specificity: 78%

Communication behavior
Häfeli, Lischer & Schwarz (2011)

Sensitivity: 78%
Specificity: 75%
All cases of suspicious communication behavior are escalated and investigated by a dedicated team. If indication of gambling related problems is found, the player is excluded from gambling.

### Intervention Protocols

<table>
<thead>
<tr>
<th>Indication</th>
<th>Risk Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>green</td>
<td>yellow</td>
</tr>
<tr>
<td>Increased involvement without further indication of risk</td>
<td>Indication of risk behavior</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Intervention</th>
<th>Restricting rights and possibilities of the player: * deposit restrictions * exemption from marketing and promotions</th>
<th>* Arranging self-exclusion or imposing exclusion * Establishing contact to counselling providers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Creating problem awareness</td>
<td>---------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>

*green level* indicates increased involvement without further indication of risk. *Yellow level* indicates indication of risk behavior. *Red level* indicates indication of manifest gambling related problems.
Behavioral Prediction

Every prediction is subject to errors. By setting the threshold for triggering an intervention, these errors are managed.

Highly sensitive model:
* will intervene for the vast majority of potential problem gamblers
* will however also intervene for the majority of recreational gamblers
* is therefore limited to non-invasive measures
Behavioral Prediction: Intervention

• Responsible Gaming mailer: Increasing problem awareness
  Sensitivity ~ 90%
  Specificity ~ 50%

• Pop-up: Interrupt the course of gameplay for self-reflection feedback
  Sensitivity ~ 65%
  Specificity ~ 85%

• Responsible Gaming team: Detailed investigation of the case
  Sensitivity ~ 15%
  Specificity ~ 99%
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ID verification and minor protection

Account Registration

Verification against Blacklists

Level 1 Database Check

Backup Process:
  Manual Picture-ID document check

Level 2 Database Check

Payment method security check

Is the customer allowed to gamble if his registration data were correct?

Is the customer on a list of players who have excluded themselves from gambling?

Is there a person with that registration data at all?

Can the customer identify himself as this person?

Are payment methods linked to the person the customer claims to be?