

Fraud Prevention:

► What is "Fraud"?:

'Obtaining money or a financial advantage, for yourself, or for another person, through dishonesty or deception.'

► Why commit fraud?

- Obtain money (Credit Card fraud, Promotion abuse)
- Launder proceeds from criminal activity
- Part of a problem gambling behaviour

Credit Card Fraud

Third party fraud

1. Obtain card data
 - Phishing, Skimming, Hacking, Identity theft
2. Transfer funds from card
3. Convert the funds into cash equivalents

First party fraud

Cover losses or purchases through disputing genuine transactions

Chargeback

- ▶ Fraud committed against operators
- ▶ The card holder disputes, through his bank, transactions made to the merchant (Unibet)
- ▶ Several reasons for a chargeback exists
- ▶ We need to prove that the card holder indeed authorized the transaction – reversal burden of proof
- ▶ If chargeback is not successfully defended we are liable for the full amount

Anti Money Laundering

What is Money Laundering?

“Engaging in financial transactions to conceal the identity, source, or destination of illegally gained money”

Three phases:

- Placement
- Layering
- Integration

Unibet:

- Group wide AML Policy/Mandatory training
- Specifically designated AML officer
- Adhering to 3rd money laundering directive
- Advising for the 4th directive
- Experts approving transactions
- Dedicated system functionality

Player Safety: Operation and Key processes

- ▶ 4 teams based in Malta: Monitoring, Financial, Investigation, Intel team.
- ▶ All teams focussed on specific moment of customer life cycle
- ▶ Currently consisting of 14 highly skilled specialists – 24/7 monitoring of transactions
- ▶ Background and experience in various fields
 - Auditing
 - Criminology
 - Finance
 - Psychology
 - Customer service
- ▶ Constant liaison with law enforcement and financial institution

Customer Life Cycle:

Monitoring team

Financial team

Investigations Team

Register

Deposit

Play

Withdraw

Report (3rd party)

AML

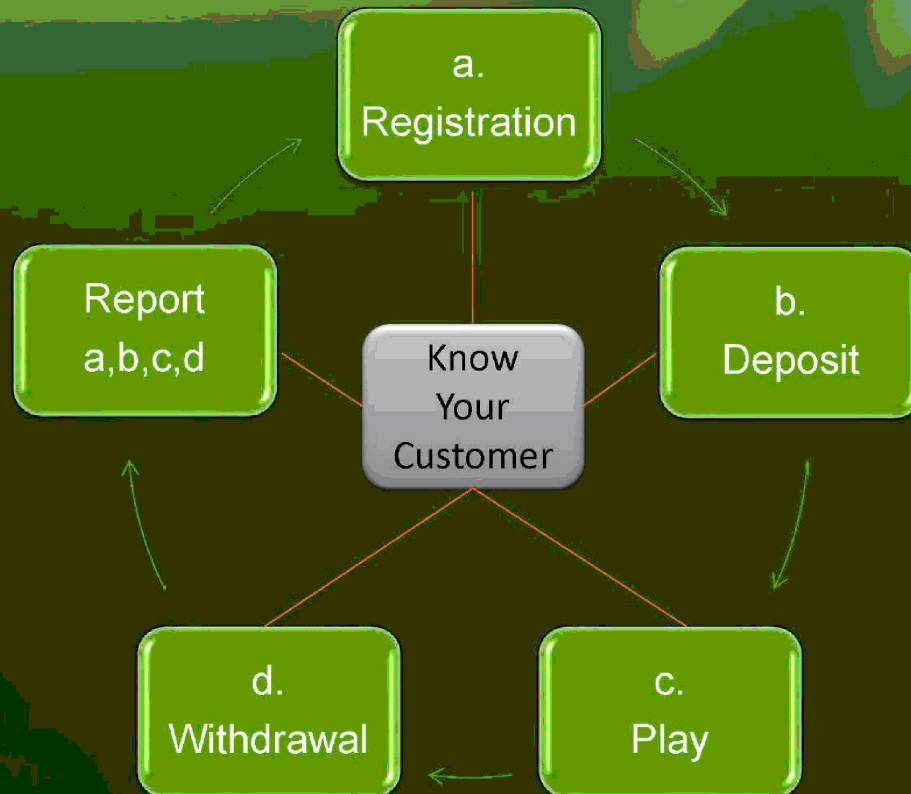
Collected Confidence (Verification/Due diligence)

Confidence Evaluation

Intel Team

Restrictions on future behaviour (Permissions)

Risk based approach:



Example:

Behaviour:

- step a **OR** b **OR** c
= low risk
- step a **AND** b
= medium
- step a **AND** b **AND** c
= high risk

Customer verification: KYC platform:

A built in application.....

Overview

Classification

Verification

KYC Back office

CustomerInfo

Username:

ThicolUnibet@unibet

Country:

GB

Jurisdiction:

MT

LicenseType:

COM

Currency:

EUR

Language:

en

RegistrationDate:

2010.07.20 17:24:20

DaysSinceRegistration:

700

CustomerState:

TEMPORARY

TestUser:

false

IPInfo

RegistrationIP:

194.204.124.32

RegistrationGeoIP:

MT

Classification

Problem Withdrawal (ID, PA)

X

Reason:

Add

Restrictions

BLOCK_WITHDRAW

(Problem Withdrawal (ID, PA))

BLOCK_WITHDRAW2K

(MT/AG jurisdiction (COM/NET license) - Not allowed to withdraw 2K)

Event	Date	Created By	Change	Reason
ClassificationChangeEvent	2012.06.20 12:11:11	thicol	[Problem Withdrawal (ID, PA)] [BLOCK_WITHDRAW, BLOCK_WITHDRAW2K]	

....allowing Player Safety to specifics actions/restrictions towards customers

First name:	Test	Proof of Identity	
Last name:	Account	Expires (dd/mm/yyyy)	
Gender:	M		
Street:	Sunset Court flat 4	Proof of Address	Type
ZIP:	6850		
City:	St Paul S bay		
Country:	GB		
Date of birth:	28/01/1979	Contract	Type
PersNr / SSN:		Sign date (dd/mm/yyyy)	
Jurisdiction:	MT		
External Verification			
ID3:	Execute	Bank Statement	Type Last 4 digits
		Credit Card	Type Last 4 digits
		Account Review Finished	☐

Mandatory training: e-learning



Welcome to the Unibet Learning Portal.

As a listed company in a regulated industry, it is important for Unibet to maintain compliance with applicable laws in order to do business and minimise risk. By taking compliance on all levels of the organisation we **ensure** continued business growth, contribute to trust and security as key business enablers and **increase** shareholder value.

Awareness of the UK's and DORA's is a key enabler of increased compliance and a building stone of the UK strategy.

These e-learning courses have two main drivers:

1. Increase in regulatory complexity, driven by the increasing number and level of regulation, gaming licenses and multiplication of audits (GD, AML, Age, eCOGRA, etc).
2. A growing company with increased head count, hence a need to get more scalability and coverage in the Unibet corporate training program. The e-learning platform provides General Awareness Training (GAT) for the first layer of Unibet Group PLC (UGP), and, depending on your functions will be complemented with more dedicated workshops.

These training courses will help you to understand why basic compliance aspects are so important in the gaming industry and why everyone must be accountable to do so to ensure compliance with applicable regulations, rules, codes and standards. These aspects shall be present in your day to day work and these courses are here to support you and keep you on the right side of the law!

Enough talking now, to start please go to the "Learning" tab at the top left of the page. This will display the courses and assessments assigned to you. Please note that it is mandatory for you to complete all the courses and assessments assigned to you. Good luck!

(If you have any questions, please contact the L&C team at: legal@unibet.com)

My Dashboard

There are no entries in your dashboard.

Unibet Intranet

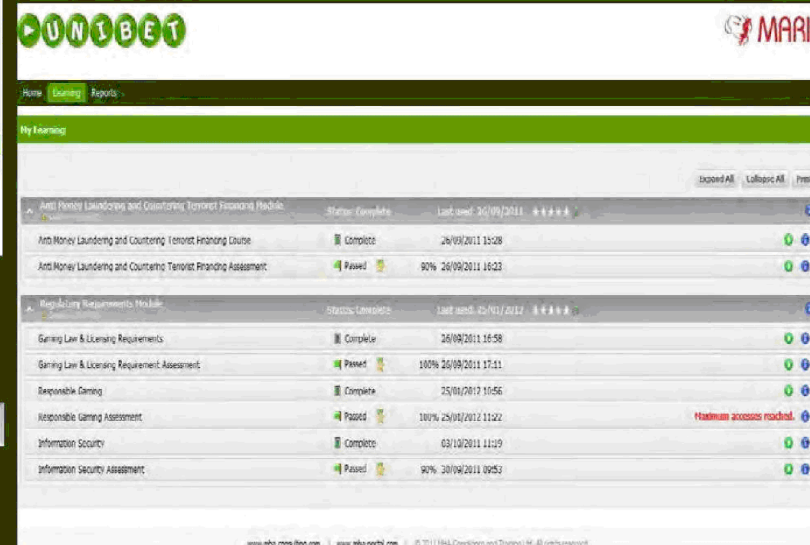
Should you need to access the Unibet L&C Intranet site for further information and direct access to policies and procedures please click the arrow link.

Emergency Support

Should you have any technical issues at anytime please contact support@mh.com who will respond as soon as possible.



For all existing and new employees



My Learning

Expand All | Collapse All | Print

Anti Money Laundering and Countering Terrorist Financing Module	Status	Completed	Last used	26/09/2011	*****
Anti Money Laundering and Countering Terrorist Financing Course	Complete	26/09/2011 15:08			
Anti Money Laundering and Countering Terrorist Financing Assessment	Passed	90%	26/09/2011 16:23		
Regulatory Requirements Module	Status	Completed	Last used	25/09/2012	*****
Gaming Law & Licensing Requirements	Complete	26/09/2011 16:58			
Gaming Law & Licensing Requirement Assessment	Passed	100%	26/09/2011 17:11		
Responsible Gaming	Complete	25/09/2012 15:56			
Responsible Gaming Assessment	Passed	100%	25/09/2012 15:22		Maximum accesses reached.
Information Security	Complete	03/10/2011 11:09			
Information Security Assessment	Passed	90%	30/09/2011 09:53		

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Modules on:

- AML
- Responsible Gaming
- Licence requirements



Responsible Gaming

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What is Responsible Gaming?

- ▶ This is the promotion of gaming as:
 - Safe
 - Secure
 - Supportive
- ▶ What is the main aim of Responsible Gaming?
 - To ensure that our players continue to enjoy our services in a safe, secure and supportive manner

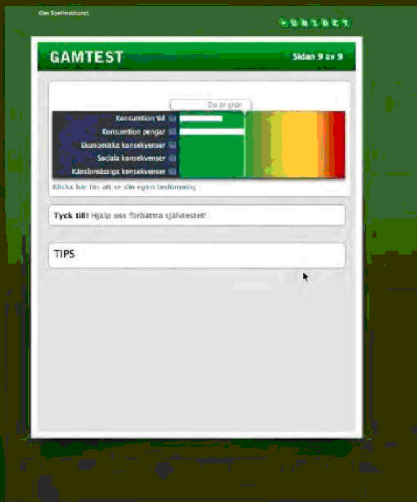
Protection of minors/underage

- Unibet does not permit any account to be opened by minors
- Requiring every user to warrant and represent that they are, in fact, 18 years or older
- Using advanced systems to identify stolen identities
- Unibet advises parents to install filtering software to prevent minors from the possibility of accessing Unibet, such as
 - CyberPatrol
 - Netnanny
 - Netmom



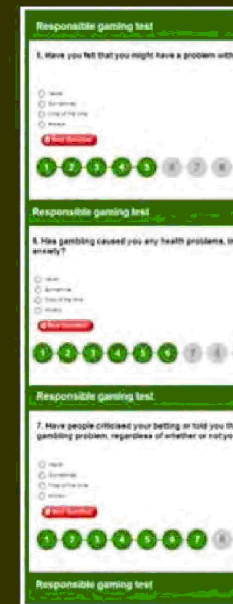
Self-assessment test

- This is a questionnaire where the customers are encouraged to answer as honestly as possible in order to check their gambling behaviour
- Questionnaire is anonymous, and advice is given



Since gambling behaviour is so versatile, Unibet is also looking into providing a self-assessment test which takes into account all aspects such as:

- Spending behaviour
- Time allocated
- Psychological affects



Other Responsible Gaming Measures

Budget:

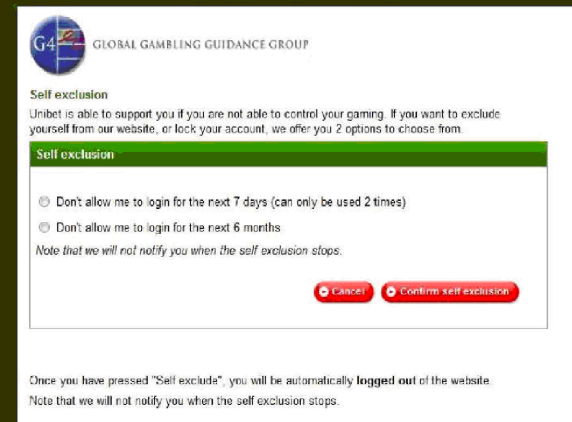
- Possibility for customers to choose how much they want to spend in a specified period
- Cooling off period if limit is less restrictive

Self-exclusion:

- Customers have possibility to remove access from their account for a said period

Product blocking:

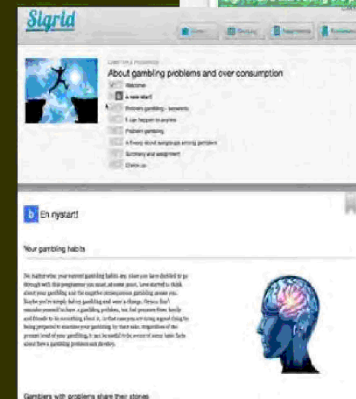
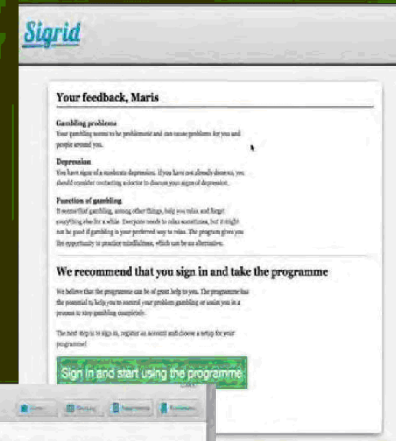
- Customers also have the option to close a specific product



The screenshot shows the 'Self exclusion' page from the Global Gambling Guidance Group. It includes a header with the G4 logo and the text 'GLOBAL GAMBLING GUIDANCE GROUP'. Below the header, there is a section titled 'Self exclusion' with a brief explanation: 'Unibet is able to support you if you are not able to control your gaming. If you want to exclude yourself from our website, or lock your account, we offer you 2 options to choose from.' The main content area has a green header 'Self exclusion' and two radio button options: 'Don't allow me to login for the next 7 days (can only be used 2 times)' and 'Don't allow me to login for the next 6 months'. A note below the options states: 'Note that we will not notify you when the self exclusion stops.' At the bottom of the form are two red buttons: 'Cancel' and 'Continue self exclusion'. Below the form, there is a footer note: 'Once you have pressed "Self exclude", you will be automatically logged out of the website. Note that we will not notify you when the self exclusion stops.'

Online self-help program

- Customers will be provided with a link where they can access an online self-help program
- Pre-registration questions to view customer's motivation for change, and their overall health
- Choice of stopping gambling completely or controlling their gambling
- Information and guidance for customers about their thoughts, problems and over consumption



Gambling spectrum

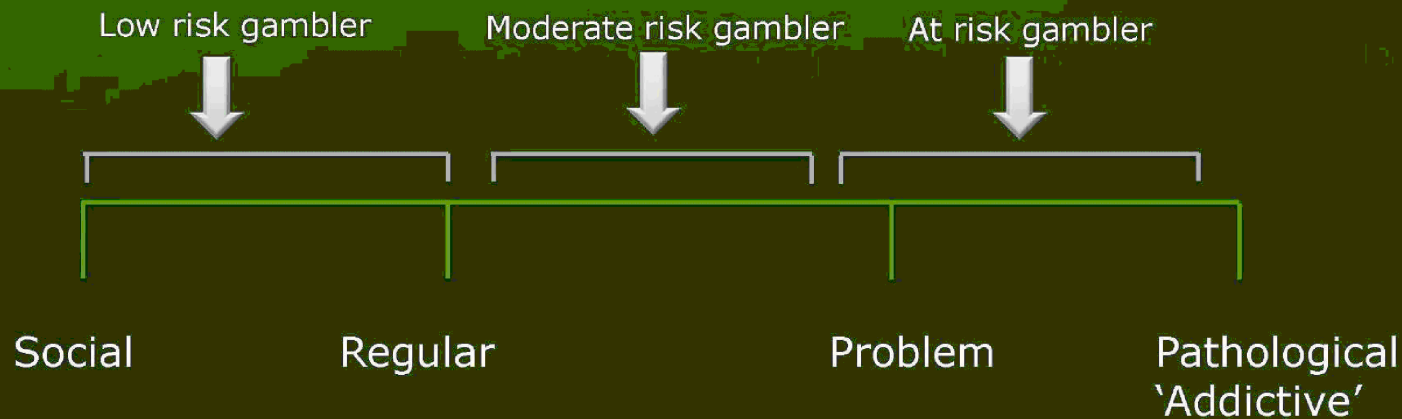
- Any behaviour varies in intensity depending on the person
- This spectrum can be applied to most human behaviour:



- Prevalence studies show that in the UK, 7% of gamblers actually move from Regular to Problem constantly, where some eventually end up at Pathological.
- System Luzern is actually tailored in spotting these customers, in order to help them regulate their gambling.

System Luzern

Data from every customer is inserted in a scoring system which will give every customer a risk score:



At risk gamblers are observed individually in order to determine the best course of action and best communication channel.

Indicators are based on empirical studies

- Written and verbal communication
- Chasing losses, frequency and amount
- Chasing winnings
- Specific sports betting behaviour
- Declined deposits & reversed withdrawals
- Change in deposit methods & products

Once customer is detected as at-risk, a humanistic approach is used which takes into account:

- Gender
- Age
- Nationality
- Time and accessibility

Through this information, we provide a customer centric approach and advise best possible RG tools

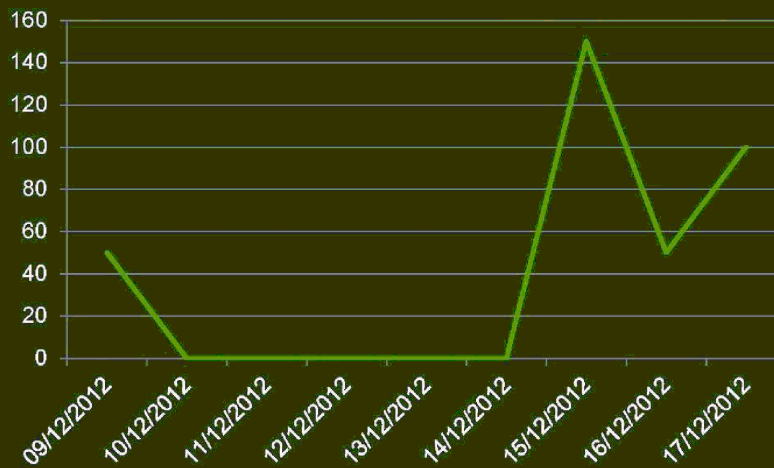
Responsible Gaming channels

- Depending on the nature of the indicators and risk
- Choosing communication channel preferred by customer
- RG Promotional Email
- RG call:
 - This would be done by RG experts in customer service
 - Received all RG training
 - Usually come from a social work/psychology background
- Two cases we previously had will be shown and taken through step by step

Case scenarios experienced

Case number 1:

- Customer got detected on System Luzern on the 15th December
- Risk: chasing losses



Our evaluation:

- Customer registered in 2007
- Played in 2010 where he withdrew €1200 which was higher than his deposits
- After playing in the afternoon, he started playing during the night as well
- In 2010, the average deposit was over €200 a week
- Poker activity from stable to slightly erratic:

Date	Time (GMT)	Transaction No.	Description	Game No.	Table Name	Balance Change	Table Balance	Final Balance
15 Jan 2013	11:21:18	-	Texas Holdem	4727950952	Anon Holdem HU 001 - €40 Max	-EU € 48.34		
15 Jan 2013	11:20:50	-	Texas Holdem	4727950890	Anon Holdem HU 001 - €40 Max	-EU € 0.40	EU €48.34	
15 Jan 2013	11:20:48	-	Texas Holdem	4727950807	Anon Holdem HU 001 - €40 Max	-EU € 0.20	EU €48.74	
15 Jan 2013	11:20:43	-	Texas Holdem	4727950593	Anon Holdem HU 001 - €40 Max	-EU € 0.80	EU €48.94	

Player/Cards	OBR	FLOP	TURN	RIVER
Player 1(DaJSalate)	BB R↓	B↓	B↓	B↓ C
GOGOGOGO	SB R↓ C→	C→	C→	A

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- Customer was born in 1972 and he is male
- Research shows that males tend to prefer sports betting or poker as gambling which requires skill is usually preferred
- In this case, customer is depositing more amounts, and certain hands show that he was slightly erratic
- There is a chance that poker is being used to elevate certain esteem and thus could be a sign of early stages of social gambler to a problem gambler
- Customer used to call in 2010, and communication was also done via email
- After this evaluation, RG manager advised expert to call customer

Call format:

- Security questions
 - At risk characteristics
 - Attitude about gambling
 - Information about RG tools
 - Confirm with customer about information
 - Confirm with customer that information will be sent
 - Make sure to close call on a positive note
-
- Resolution:
 - Appreciation for calling him
 - Confirmed that everything is fine
 - He is a regular gambler with other companies
 - Affords to spend a bit more
 - Playing is still a form of entertainment
 - Customer choose to have a break

Case scenarios experienced

Case number 2:

- Customer got detected on System Luzern on the 25th October
- Risk: changing time of play, immediate chasing losses & reversing withdrawal

25/10/2012 22:01	Earthport withdrawal	-40
25/10/2012 20:59	Earthport withdrawal (correction)	50
25/10/2012 20:10	Earthport withdrawal (corrected)	-50
25/10/2012 12:14	Envoy deposit	150
24/10/2012 21:22	Envoy deposit	100
24/10/2012 17:05	Envoy deposit	60
24/10/2012 15:59	Earthport withdrawal	-20
24/10/2012 12:47	Envoy deposit	50

Initial evaluation

- Customer was notified via email about RG tools, but kept under investigation because:
 - Female and born in 1970
 - Research shows that females tend to use gambling as a way of escapism
 - She is showing signs of responsible gaming, but also signs of potential problem gambling
- 31st October (6 days after detected on Luzern), she requested to change her budget from €100/weekly to €100/daily:

31-Oct-2012 12:59:16	punter	Pending spending budget set. Limit=100. Period length=1
25-Oct-2012 20:59:09	punter	New spending budget activated. Limit=100. Period length=7

Action taken:

- Decision was taken not to accept to reverse withdrawals for the customer, until we contact her
- Female RG expert as there might be sensitive issues involved

Call format:

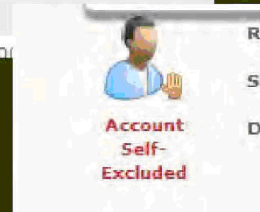
- Security questions
- At risk characteristics
- Attitude about gambling
- Information about RG tools
- Confirm with customer about information
- Confirm with customer that information will be sent
- Make sure to close call on a positive note

Resolution:

- From a psychologist's point of view, I could tell customer might be showing problems, but customer needs to take the decision
- If I took decision to just close account, she will be angry and hostile, and vent out through another operator
- Instead our approach promotes informed adult choice, in which case we phoned a customer to include the humanistic approach (not just a website)
- Customer chose to self-exclude for 6 months

Created	Created By	Message
05-Nov-2012 15:14:01	punter	Punter has self excluded for 180 days
31-Oct-2012 12:59:16	punter	Pending spending budget set. Limit=100

Once self-exclusion finishes, monitoring will be done, and friendly call will be done to ensure all is well



Customer relationship management

- By implementing RG preventive approach, an overall better customer experience is achieved
- By detecting early signs of problem gambling, it helps to build a relationship with the customer through personalised and meaningful tips
- Tools such as budget, blocking of products, opting out from promotions will help customer to regulate his/her gambling. This way the customer has a stable and constant relationship with Unibet.

Training across Unibet

“One size fits all” model is rejected

Introductory RG training for new CSAs

Level 1 training – general awareness through online learning

Level 2 training – customer facing employees; empathy skills, communication skills & policy

Level 3 training – in-depth training:

- Motivational interviewing & empathy
- Worse case scenarios

NB – in liaison with Gambling Therapy

Collaborations with treatment centres

- We also seek to create collaborations with local treatment centres
- Financial donation
- Exchange of information:
 - Responsible gaming policy
 - Responsible gaming procedures
 - Advances about System Luzern



By players, for players

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Verslag bezoek ICE Totally Gaming Londen

Dinsdag 5 februari

Op dinsdag 5 februari is deelgenomen aan de World Regulatory Briefing. Deze conferentie stond in het teken van de grensoverschrijdende samenwerking en communicatie tussen de toezichthoudende organen. Meerdere malen is benadrukt dat online kansspelen een grensoverschrijdend probleem is en dat een goede samenwerking essentieel is voor de aanpak van illegale online aanbieders. De gelegenheid werd gegeven om vragen aan andere EU handhavers te stellen en zo informatie uit te wisselen.

Na de conferentie zijn we vertrokken naar Unibet. Zij hebben ons een rondleiding gegeven door het gebouw, één verdieping met een hoge dichtheid aan bureaus en mensen. Unibet heeft een uitgebreide presentatie gehouden over de klantenservice en responsible gambling. De klantenservice is gevestigd in Malta. Hier werven ze callcenter medewerkers die universitair of in ieder geval hoger opgeleid zijn. Unibet hecht veel belang aan responsible gambling. Zij bieden onder andere een self-assessment test en een online self-help programma aan. Voor de geïnteresseerden is een presentatie beschikbaar waarin hun strategie duidelijk wordt uitgelegd.

Tenslotte zijn we naar de 'executive networks drinks' gegaan. Het was de bedoeling dat deze borrel voor een hoge opkomst zou zorgen. Het resultaat was echter teleurstellend, waardoor we maar een aantal partijen hebben gesproken.

Woensdag 6 februari

Deze dag stond met name in het teken van de geplande bijeenkomsten met Italië

5.1.2e		Denemarken	5.1.2e	en	5.1.2e	en België	5.1.2e
5.1.2e	en	5.1.2e					

. De openstaande vragen die we hadden met betrekking tot online kansspelen zijn gesteld en de banden zijn versterkt waardoor de drempel om hen vragen te stellen is verlaagd. Uiteraard zijn we allemaal uitgenodigd om een bezoek aan hen te brengen en hebben wij aangegeven dat dit wederzijds is.

Na de bijeenkomsten was nog even tijd om over de beurs te wandelen en partijen als GLI, REAC en Holland Casino te spreken.

**Agenda 11 februari Online kansspelen en certificeren/keuren.
13:30u – 14:30u
Ministerie van Veiligheid en Justitie (Hoekzaal 2^e verdieping)**

I. Opening

II. Mededelingen

III. Stand van zaken wetsvoorstel online

IV. Keuring/certificering van spelsystemen

- Uitleg (zie ook bijlage schema keuring van spelsystemen)
- Vragen
 - Is certificering beter dan keuring met beslissingsbevoegdheid door de Kansspelautoriteit op basis van keuringsrapporten?
 - Heeft onaangekondigde keuring voordelen boven jaarlijkse keuring?
 - Heeft controle op de prestaties van keuringsinstellingen voordelen boven controle op de kundigheid en methoden van keuringsinstellingen?
 - Is het onwenselijk dat keuringsinstellingen benoemd en betaald worden door de aanbieders die gekeurd worden, mede gezien de internationale context?
 - Is het aanvaardbaar om initiële keuring en keuring van veranderingen binnen een bepaalde periode na respectievelijk vergunningverlening en veranderingen toe te laten, in plaats van vooraf?
 - Heeft de voorgestelde benadering naar verwachting voordelen boven een systeem van slechts initiële en jaarlijkse keuring door een overheidsinstelling?
 - Welke risico's heeft de voorgestelde benadering?
 - Welke alternatieven zijn er?
 - Wat zijn de aanbestedingsimplicaties van acceptatie?

V. Rondvraag en sluiting

To: 5.1.2e - BD/DSP/PS 5.1.2e @minvenj.nl; 5.1.2e - BD/DWJZ/SBR 5.1.2e @minvenj.nl; 5.1.2e 5.1.2e @mineleni.nl; 5.1.2e @mineleni.nl; 5.1.2e - BD/DWJZ/SBR 5.1.2e @minvenj.nl; 5.1.2e @kansspelautoriteit.nl 5.1.2e @kansspelautoriteit.nl
From: 5.1.2e - BD/DSP/PS
Sent: Fri 2/8/2013 1:38:35 PM
Subject: RE: Online kansspelen en certificeren/ keuren/ aanbestedingsvragen
Received: Fri 2/8/2013 1:38:35 PM
[Agenda bijeenkomst kansspelen en certificeren of keuren.doc](#)
[Schema keuring.ppt](#)

Beste allemaal,

Vooruitlopend op onze bijeenkomst sluit ik een agenda en een schematische uitleg van het voorgestelde systeem van keuring bij.

Tot maandag en prettig weekend!

5.1.2e

-----Oorspronkelijke afspraak-----

Van: 5.1.2e - BD/DSP/PS
Verzonden: woensdag 30 januari 2013 10:16
Aan: 5.1.2e - BD/DWJZ/SBR; 5.1.2e BD/DSP/PS; 5.1.2e 5.1.2e ; 5.1.2e - BD/DWJZ/SBR; 5.1.2e @kansspelautoriteit.nl
Onderwerp: Bijgewerkt: Online kansspelen en certificeren/ keuren/ aanbestedingsvragen
Tijd: maandag 11 februari 2013 13:30-14:30 (GMT+01:00) Amsterdam, Berlin, Bern, Rome, Stockholm, Vienna.
Locatie: VenJ (Hoekzaal 2e verdieping)

Hai 5.1.2e

Conform eerdere mail (even hieronder geplakt) hierbij uitnodiging overleg.

Tot dan!

Gr 5.1.2e

=====

Beste 5.1.2e 5.1.2e

Zoals jullie weten (iig 5.1.2e) zijn wij bij VenJ bezig met wetsvoorstel online kansspelen. Een onderdeel van de vormgeving van het wetsvoorstel betreft de eisen die wij willen stellen aan het systeemcomplex van een kansspelaanbieder. Het systeemcomplex ziet - even kort door de bocht gezegd - op de organisatie van de aanbieder (personeel, processen binnen een organisatie) en het systeem zelf (hardware en software).

Vanuit onze doelstellingen (consumentenbescherming, voorkomen kansspelverslaving en voorkomen fraude en criminaliteit, en attractief aanbod) willen wij dat het systeemcomplex:

- veilig is (vertrouwelijkheid, tegengaan fraude en witwassen)
- Continuïteit waarborgt (systeem moet stabiel zijn)
- Eerlijk is (eerlijkheid van het spel dient gewaarborgd te zijn, zodat de kans niet beïnvloedbaar is)
- Geschikt is (voor naleving en controle door de toezichthouder)

Middel hiervoor is o.a. certificering.

In de kansspelwereld zijn verschillende certificerings/ keuringsinstanties actief (GLI/ NMI/ Ecogra etc). Actueel punt is hoe het toezicht wordt vormgegeven.

De opties luiden nu als volgt:

- initiële keuring systeemcomplex (door certificerings/ keuringsinstantie uitgekozen door aanbieder);
- Periodieke keuring kritieke wijzigingen (door certificerings/ keuringsinstantie uitgekozen door aanbieder)
- Verassingsinspectie (door certificerings/ keuringsinstantie uitgekozen door aanbieder op een door de toezichthouder gekozen moment)

- En evt als extra optie: verrassingsinspectie (door certificerings/ keuringsinstantie uitgekozen door toezichthouder). Deze laatste optie roept weer allerlei aanbestedingsrechtelijke vragen op, nl overheid kiest een private partij uit, en hoe houd je het karakter van verrassing als je een aanbesteding doet etc.

De eerste twee opsommingen zouden sowieso dienen plaats te vinden. De vraag is nu of de derde optie überhaupt realiseerbaar is en welke haken en ogen eraan vast zitten.

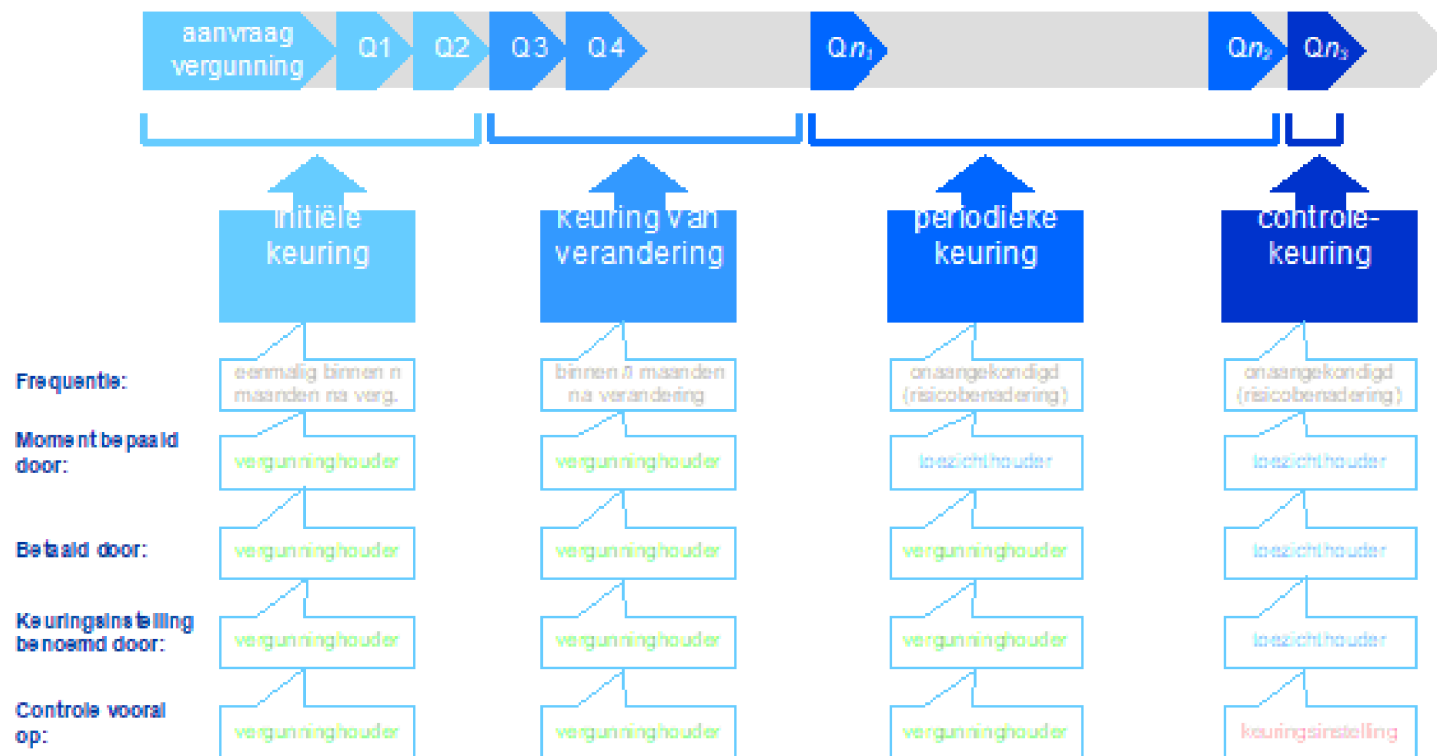
Graag zouden we met jullie (vanuit jullie verschillende expertises) hierover van gedachten wisselen. Hebben jullie binnenkort een uurtje de tijd om even langs te komen hier?

Keuring van spelsystemen

Toegelaten keuringsinstellingen

Gescredeerd door Raad van Accreditatie (algemene criteria)

Geaccepteerd door Kansspelautoriteit (kansspel-specifieke criteria)



To: [5.1.2e] - BD/DSP/PS [5.1.2e] @minvenj.nl]; [5.1.2e] -
BD/DSP [5.1.2e] @minvenj.nl]; [5.1.2e] - BD/DSP [5.1.2e] @minvenj.nl]; [5.1.2e] -
BD/DWJZ/SBRI [5.1.2e] @minvenj.nl]; [5.1.2e] - BD/DSP/PS [5.1.2e] @minvenj.nl]; [5.1.2e]
[5.1.2e] @capgemini.com]
From: [5.1.2e]
Sent: Wed 4/17/2013 11:42:06 AM
Subject: RE: Zorg: grenzen aan legaal gokken
Received: Wed 4/17/2013 11:42:13 AM

Ha allen,

Vanochtend hebben [5.1.2e] en ik gesproken met:

- [5.1.2e] - Betfair
- [5.1.2e] - Gambling integrity services
- [5.1.2e] - Gambling integrity services (contactgegevens: [5.1.2e] | [5.1.2e])

Belangrijkste besproken punten:

- I. Van organisatorische aard:** [5.1.2e]
[5.1.2e] Met dit bedrijf adviseren zij onder andere Betfair.
- II.** We kregen daarom, geheel consultancy stijl natuurlijk ☺, eerst een voorstel van hoe [5.1.2e] ons zou willen helpen met het vraagstuk waar wij nu mee spelen, namelijk hoe maak je de effort van vergunninghouders op het gebied van de zorgplicht meetbaar. Hierbij werden de volgende punten genoemd:
 - a. Regelgeving moet zo min mogelijk ruimte voor interpretatie van de aanbieders overlaten
 - b. Studie om best practices op verslavingspreventie (zowel informeren als interveniëren) te formuleren, op basis van onderzoeken en gesprekken met de industrie
 - c. In kaart brengen hoe de aanbieders op deze best practices scoren
 - d. GAP-analyse tussen wat we willen en wat de aanbieders doen, met aanbevelingen voor de aanbieders om te voldoen
 - e. Consumenten focus groepen opzetten om het beleid te toetsen
 - f. Elke paar jaar opnieuw in kaart brengen hoe het staat met de populatie spelers (normaal, risico, probleem)
- III.** Belangrijk om het onderscheid te maken tussen wat EIS je en wat VERWACHT je, aangezien in de laatste variant nog een ruimte lijkt te bestaan voor aanbieders. Bijvoorbeeld: specifiek vragen om interventie, en niet dat het mogelijk is om enkel bij interactie met de speler al aan de eisen te voldoen.
- IV.** Het moment van interventie zal altijd worden bepaald aan de hand van menselijke inschatting. Uit het systeem kunnen de signalen komen, maar het personeel van een aanbieder maakt op basis hiervan de keuze om een speler aan te spreken en/of nader in de gaten te houden

V.

5.1.2f

Er zijn geen internationale standaarden geen training en certificering. Wel werd aangegeven dat de roep hierom binnen de EU steeds groter wordt, en dat er bij zowel autoriteiten als aanbieders wel oor zou zijn voor het opstellen van dergelijke standaarden.

- VI.** Er is helaas geen antwoord gekomen op de vraag hoe je interventies en de zorgplicht van aanbieders ook daadwerkelijk meetbaar kan maken.
- VII.** Tegenover het principe van het centraal register stonden de heren positief. Hierbij werd wel de opmerking gemaakt dat het duidelijk en controleerbaar moet zijn wanneer iemand wordt uitgesloten, en voldoende toezicht of elke aanbieder zich hier ook goed aan houdt.

Tot zover! [5.1.2e] heb jij hier nog aanvullingen op?

Met vriendelijke groeten,

[5.1.2e]

Consultant

Wilt u meer weten over ons werk? Kijk dan op ons [blog](#)



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From: 5.1.2e - BD/DSP/PS [mailto:5.1.2e@minvenj.nl]
Sent: maandag 15 april 2013 9:35
To: 5.1.2e - BD/DSP; 5.1.2e
Subject: RE: Zorg: grenzen aan legaal gokken

Ik ben met name dan benieuwd:

- waar hun bezwaren zitten tov onvrijwillige uitsluiting.
- (in licht vakbekwaamheid) Wat voor vereisten stellen aanbieders aan hun personeel. Wie dienen er opleidingen te volgen tav kansspelverslaving? Alleen mensen bij bv klantendienst, of ook managers? En dient dit bv om de paar jaar herhaald te worden per medewerker? Wat voor eisen komen ze in andere landen tegen op dit onderwerp?

Gr 5.1.2e

From: 5.1.2e - BD/DSP
Sent: maandag 15 april 2013 8:15
To: 5.1.2e
Cc: 5.1.2e - BD/DSP/PS
Subject: RE: Zorg: grenzen aan legaal gokken

Agenda 5.1.2e en 5.1.2e a.s. woensdag.

- Meetbaar maken van preventieve maatregelen bij aanbieders
 - o Zij kondigden aan hierover iets te willen presenteren
- Centraal Register, verplichte uitsluiting en rol aanbieder vanuit zorgplicht
 - o Wat is hun inschatting ten aanzien van de haalbaarheid bij aanbieders/Betfair?
- Verdieping
 - o Eisen aan spelsoorten, hoe staan zij daar tegenover?
 - o Certificering van preventie processen
 - o Bijdrage aan vervolg

5.1.2e liet zich vooral uit over betutteling door de overheid, 98 versus 2%. Ik heb idee dat industrie helemaal niet zo afwijzend staat tegenover een rol in verplichte uitsluiting.
 Wel kritisch worden ze als we inleglimieten etc. gaan vaststellen.

Kun jij een agendaatje in Engels maken? Misschien heeft 5.1.2e ook nog wel vragen.
 NB 5.1.2e probeert om de afspraak half uur te vervroegen vanwege mijn vertrek naar Brussel.

5.1.2e

From: 5.1.2e
Sent: maandag 15 april 2013 8:07
To: 5.1.2e - BD/DSP
Subject: FW: Zorg: grenzen aan legaal gokken

Op de agenda voor het overleg met 5.1.2e morgen?

En wellicht contact opnemen met 5.1.2e wat zijn bezwaren zijn bij onvrijwillige uitsluiting? Of is dat iets voor consultatie en gaan wij door op de ingezette lijn?

From: 5.1.2e
Sent: zondag 14 april 2013 10:34
To: 5.1.2e
Subject: Zorg: grenzen aan legaal gokken

Zorg: grenzen aan legaal gokken <http://nos.nl/1/495626>
Gokbranche wil lagere belasting <http://nos.nl/1/495624>

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Ministerie van Veiligheid en Justitie

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Ministry of Security and Justice

Het Ministerie van Veiligheid en Justitie (hoofdkantoor) verhuist de eerste helft van 2013 naar de Nieuwbouw op de Turfmarkt 147.

Let op bij afspraken in deze periode op welk bezoekadres u moet zijn. Het postadres verandert niet.

Verslag expertbijeenkomst CRUKS

25 april 2013 in conferentiecentrum 7AM in Den Haag

Aanwezigen:

5.1.2e	Kansspelautoriteit
	Kansspelautoriteit
	Assissa
	JVH Gaming / D2D4
	JVH Gaming
	Holland Casino
	VAN
	Unibet
	Unibet
	STIOG
	Ministerie van Veiligheid en Justitie
	Ministerie van Veiligheid en Justitie
	Ministerie van Veiligheid en Justitie
	PwC
	PwC

Doel van de bijeenkomst:

Het verkrijgen van input op en toetsing van het eerste concept van het ontwerpdocument Centraal Register Uitsluiting Kansspelen door aanwezige experts.

Kort verslag van de bijeenkomst:

Inleiding

5.1.2e heet de deelnemers welkom en geeft een korte inleiding over de status van het Centraal Register Uitsluiting Kansspelen (CRUKS).

5.1.2e merkt bij aanvang van de bijeenkomst het volgende op: tot nu toe wordt het inrichten van het CRUKS zeer voortvarend door het ministerie opgepakt. Dit leidt tot een grote impact op de stakeholders, terwijl aannames in eerdere fasen van het proces (zoals de impactanalyse) niet voldoende getoetst zijn bij de aanwezige experts. De uitkomsten van de impactanalyse zou opnieuw en diepgaander behandeld moeten worden. Het gaat vooral om de uitgangspunten CRUKS ten aanzien van: de scope en definitie van short odds-kansspelen voor het Centraal Register, de 100%-toegangscontrole voor alle aanbieders en onvrijwillige uitsluiting. De impactanalyse zou opnieuw en diepgaander behandeld moeten worden. 5.1.2e maakt verder het voorbehoud dat het raadplegen van deelnemers niet hetzelfde is als instemming verkrijgen.

5.1.2e geeft aan dat de impactanalyse is besproken met de staatssecretaris. Dit heeft geleid tot de aanvullende uitgangspunten. De verschuiving van de huidige long odds-spelen naar short odds-varianten staat op de agenda van het departement. De gegeven uitgangspunten beschrijven de huidige lijn, maar het ministerie is zeker bereid hier nog eens een gesprek over te voeren. De onvrijwillige uitsluiting is volgens de staatssecretaris noodzakelijk voor een goed werkend register. Het leggen van beslisverantwoordelijkheid bij aanbieders is hierbij lastig gebleken. Daarom is in het eerste concept gekozen voor de Ksa om te beslissen over de onvrijwillige uitsluiting.

5.1.2e geeft een overzicht van de doelstellingen van de bijeenkomst, de doelstellingen van het CRUKS en de producten van het vervolgproject CRUKS:

- Een ontwerp (gebaseerd op de impactanalyse en input van stakeholders);
- Een Privacy Impact Assessment;
- Input voor het wetsvoorstel ten aanzien van het Centraal Register op hoofdlijnen (opzet, taken en verantwoordelijkheden en te registreren gegevens)
- En een advies voor het vervolgtraject.

Verwachtingen deelnemers

Een korte ronde met verwachtingen van deelnemers wordt gemaakt. Samengevat zijn dit de volgende:

- Een toelichting op de huidige opzet van het CRUKS is gewenst;
- De meeste aanwezigen geven aan het Centraal Register te steunen, maar nog wel vragen/discussiepunten te hebben over de volgende onderwerpen:
 - De relatie van het register met de zorgplicht van aanbieders en de beleidsvrijheid van aanbieders om daar eigen invulling aan te geven;
 - Operationele werkbaarheid van de processchema's en impact op de bedrijfsvoering van de aanbieders;
 - De implementatie van CRUKS in de tijd;
 - Definitiestellingen (bijv. 'verslaving' en long-odd vs. short-odd);
 - Werkwijze ten aanzien van buitenlandse spelers.
- JVH en VAN geven aan het Centraal Register te zien als een lastenverzwaring, en de invoering niet te steunen. Het 'lean & mean'-principe is nu onderbelicht.
- Tevens leven zorgen over de onvrijwillige uitsluiting en privacy-aspecten wanneer derden spelers aan kunnen melden.

Discussie over verschuiving long naar short odds en 'waterbedeffect' van CRUKS

De reikwijdte van het CRUKS is een belangrijk onderwerp. Op dit moment vallen short odds-spelen bij casino's, automatenhallen en online aanbieders in scope. Sportwedenschappen, krasloten en andere loterijen zijn buiten beschouwing, hoewel deze steeds meer een short odd karakter krijgen.

- Dit punt vraagt aandacht, omdat het toenemende short odd karakter van traditionele long odd kansspelen wordt gesignaleerd in de markt. Een voorbeeld zijn online krasloten. Hoewel de scheiding short en long odds begrijpelijk is vanwege de hieruit voortkomende relatief eenvoudige mogelijkheid tot scheiding in de speelgelegenheden (met uitzondering van de horeca), is het wenselijke om binnen de scope van het Centraal Register een definitie van short odd kansspelen toe te voegen.
- Ook het waterbedeffect wordt benoemd als risico voor de aanbieders die onder het Centraal Register vallen: wanneer personen het gevoel krijgen geregistreerd te worden, bestaat het risico dat spelers ergens anders gaan spelen. Voor de doelgroep van kansspelen kan een centraal register drempelverhogend voor deelname zijn. De kansspelautomatensector ziet het risico van een verschuiving naar speelautomaten in de horeca, waar de zorgplicht mogelijk minder sterk wordt ingevuld. Online kan dit ook gebeuren, door een verschuiving naar niet-gereguleerde aanbieders (.com websites of illegale aanbieders).
- Er zijn weinig cijfers van dit effect beschikbaar, maar de mogelijkheid van het optreden ervan wordt beaamd.
- Holland Casino geeft aan dat het risico op dit waterbedeffect niet 100% wordt gedeeld: op dit moment geeft ca. 50% van de spelers die terugkeren na uitsluiting aan dat ze niet ergens anders hebben gespeeld tijdens de uitsluiting, hoewel personen ook een sociaal wenselijk antwoord kunnen geven. Tevens heeft HC geen significante verschuiving naar de kansspelautomatenhallen gezien toen zij begonnen met sluitende registratie van spelers.
- Het mogelijke waterbedeffect kan worden teruggebracht door effectief toezicht van de kanspelautoriteit op illegale aanbieders, en terugbrengen van alternatieven om te spelen.
 - Het is belangrijk om bij de invoering van CRUKS en de timing daarvan rekening te houden hiermee. Enkele mogelijkheden zijn: (1) de scope van CRUKS verbreden en (2) strak handhaven, zeker op online.
- | |
|--------|
| 5.1.2e |
|--------|

 geeft aan het debat hierover te willen voeren wanneer dit kan worden gestaafd met feiten. Aan de deelnemers wordt gevraagd eventueel beschikbaar cijfermateriaal op te leveren.

Bespreking CRUKS op hoofdlijnen

Een toelichting wordt gegeven op de hoofdlijnen van het CRUKS ontwerp.

- *Uitschrijving van spelers bij vrijwillige uitschrijving:* Bij vrijwillige uitsluiting kan een speler zelf de uitsluitingsperiode vaststellen, met een minimum van zes maanden:
 - Binnen die zes maanden is de uitsluiting onomkeerbaar;
 - Na zes maanden, maar voor het verstrijken van de gekozen periode kan de speler zichzelf uitschrijven (via een webformulier) of een verzoek tot uitschrijving aan de Ksa richten.
- In het ontwerp zal worden aangevuld dat een speler altijd een periode voor zelfuitsluiting moet aangeven.
- In het ontwerp zal worden beargumenteerd waarom een speler na verloop van de zes maanden de uitsluiting vroegtijdig kan beëindigen.

De mogelijkheid van een toets/check, wanneer iemand voortijdig uit het register wil, wordt onderzocht. Van belang is te onderzoeken wat het mandaat hiervoor is.

- *Identificatie en authenticatie:* Met een papieren proces om spelers aan te melden (het invullen van een formulier door de aanbieder en de speler) wordt het 'lean & mean' uit het oog verloren. De natuurlijke 'flow' uit gesprekken met spelers wordt hiermee verloren. Verder wordt benoemd dat het niet nodig is om DigiD te gebruiken wanneer een fysieke check van het BSN op het identiteitsbewijs plaats kan vinden.
 - Een voorstel wordt gedaan dat digitale middelen voor aanmeldingen in het Centraal Register voor de landbased aanbieders worden opgenomen in het ontwerp. Bijvoorbeeld een terminal voor registratie, en een aparte verbinding voor verificatie. Dit wordt meegenomen in het vervolg.
- *DigiD gebruik:* DigiD mag niet gebruikt worden voor de klantregistratie, omdat het vrijwel niet te beargumenteren valt dat het BSN wordt gebruikt voor puur administratieve doeleinden. Uit jurisprudentie blijkt dat dit zelfs binnen de overheid tot problemen heeft geleid. Wanneer het gebruik beperkt blijft tot communicatie over de burger met de overheid voor het specifieke doel van het CRUKS, kan dit mogelijk wel. Het CBP moet daar ook nog iets van moet vinden.
- *Buitenlandse spelers:* Wat te doen met buitenlandse spelers, die geen BSN hebben. Wanneer buitenlanders in Nederland spelen, zijn de Nederlandse regels (en dus het CRUKS) van toepassing. Er moet een alternatieve identificatiewijze zijn. Onderzocht wordt of de Machine Readable Zone van buitenlandse identiteitsbewijzen kan worden gebruikt.
- *Spelerspassen:* De vraag leeft of het inlogproces online gelijkgetrokken kan worden met land-based, bijvoorbeeld door het uitgeven van spelerspassen op basis waarvan eenmalige koppeling aan het ID-bewijs plaatsvindt. Dit kan de drempelverhoging voor spelers beperken. Holland Casino past dit al toe, waarbij passen gebruikt zonder foto. De foto staat in het systeem van Holland Casino.
- *Beschikbaarheid van CRUKS:* Bij het EPIS-systeem in België is ervoor gekozen dat bij een time-out een 'hit' wordt teruggegeven. Deze time-outs komen vaak voor. Beschikbaarheid is voor CRUKS belangrijk.
 - In het ontwerp zal worden beschreven welke reactie vanuit het bevragingssysteem terugkomt wanneer het CRUKS niet beschikbaar is.
- *Omgang met 'hit':* Gevraagd wordt hoe het proces 'hit' plaatsvindt. Dit kan namelijk ook impact hebben, wanneer voor de omgeving duidelijk wordt dat iemand wordt geweigerd. Dit moet op discrete wijze worden kenbaar gemaakt. Dat gebeurt bij Holland Casino nu ook.
- *Bestaande uitsluitingen Holland Casino:* Hoe wordt omgegaan met de huidige uitsluitingen bij Holland Casino. Privacy-technisch kunnen deze niet zomaar worden overgenomen, maar het zou ook vreemd zijn om een paar duizend uitsluitingen alleen bij Holland Casino te hebben. Wegstrepen kan niet zomaar. Het vormgeven van deze transitiefase wordt meegenomen in het vervolg.
- *De 100%-controle is voor online-aanbieders* een mogelijk issue vanuit het perspectief van de identificatie die bij eerste registratie niet direct volledig plaatsvindt. Spelers kunnen later aanvullende identificatie aanleveren maar wel direct beginnen met spelen. Direct spelen is belangrijk voor aanbieders. Kanalisatie zal anders niet plaatsvinden.

Onvrijwillige uitsluiting

Bij de bespreking van de onvrijwillige uitsluiting zijn de volgende onderwerpen besproken:

- *Vastlegging* dient alleen te worden verplicht als onderbouwing van onvrijwillige uitsluiting en niet voor vrijwillige uitsluiting. Wanneer iemand onvrijwillig wordt uitgesloten moet dit namelijk te motiveren zijn. Het brengt wel een zekere administratieve last met zich mee.
- *De vormgeving van onvrijwillige uitsluiting* is lastig: hoe bepaal je en onderbouw je dat iemand uitgesloten moet worden? De omgekeerde situatie, waarin iemand niet wordt uitgesloten maar dat wel zou moeten zijn, is overigens net zo problematisch. Hierbij speelt de zorgplicht van aanbieders een rol. Holland Casino heeft hier eerder juridische problemen mee gehad.
- *De beslissing om iemand uit te sluiten* zou niet bij de aanbieders moet liggen. Hiermee stel je als aanbieder een diagnose. Het is de bedoeling dat dit bij de Ksa plaatsvindt. Spelers worden aangemeld door kansspel-aanbieders of derden, waarbij voldoende informatie aangeleverd moet worden. De speler wordt vervolgens geïnformeerd.
- Het is belangrijk om de *zorgplicht* te benadrukken. Ook zonder het CRUKS bestaat deze. Het aantal onvrijwillige uitsluitingen bij Holland Casino is zeer beperkt, en ook beroepen tegen de onvrijwillige uitsluiting zijn beperkt. Ook in andere landen zijn deze aantallen beperkt.
- Het vullen van het register met de juiste personen is belangrijk is. *Risico-indicatoren* zouden hiervoor opgesteld moeten worden, met mogelijk een onderscheid tussen de casino-, speelautomaten- en online markt, waarbinnen deze hun eigen beleid kunnen voeren. Dit dient in samenspraak met de verslavingszorg te gebeuren.
- Er wordt benoemd dat het lastig kan zijn om iemand te *identificeren voor onvrijwillige uitsluiting* wanneer deze niet meewerkt. Aanbieders van kansspelautomatenhallen identificeren wel een persoon aan de deur en checken het centraal register, maar houden niet bij welke gegevens bij een speler horen wanneer deze persoon eenmaal binnen is. De huidige procedure is opgeschreven met als uitgangspunt dat je weet wie je voor je hebt. Niet iedereen zal meewerken met identificatie op dit punt. Mogelijk weet de aanbieder de identiteit al vanuit eerdere gesprekken: onvrijwillige uitsluiting vindt niet plaats op basis van een enkel incident. De implicatie hiervan wordt meegenomen in het ontwerp.
- *Verschil tussen online en land-based*: Verschillen in gedragsmonitoring tussen land-based en online worden benoemd. Er kan geen standaard normenkader zijn voor het aandragen van spelers voor onvrijwillige uitsluiting (maar mogelijk wel gelijke uitgangspunten / deels gelijke risico-indicatoren). Het uitwisselen van de preventiekaders zou beter zijn dan voorschrijven zoals in het huidige ontwerp plaatsvindt. Een administratieve verplichting zal blijven bestaan, maar het CRUKS zou aan moeten sluiten op bestaand preventiebeleid. De aansluiting van CRUKS op het individuele preventiebeleid zal nog bekeken worden.

De volgende expertmeeting zal plaatsvinden op 6 juni 2013 (vanaf 10:00 uur).

Agenda bijeenkomst betaalmiddelen

1. Opening
2. Betekenis en reikwijdte van verschillende definities. Welke moeten we in de Wok opnemen?
 - a. Betaalinstellingen
 - b. Betaaldienstverleners
 - c. Financiële instelling
 - d. Betaalinstrument
 - e. Betaalmiddel

3. Wat zijn de verschillende betaalinstrumenten/ betaaldienstverleners en wat zijn de eventuele witwas/ fraude risico's daarvan?

- Bankrekening (betaling via Ideal), creditcard, e-wallets, anonieme e-wallets en anonieme creditcards, prepaid kaarten, vouchers, post-paids?
- Hoe wordt aangekeken tegen PSP's (Payment Service Providers). Risico's vanuit witwas/ fraude optiek? Hoe vindt identificatie door PSP's plaats?

4. Betaalmiddelen en identificatie

MvT: Identificatie en verificatie bestaat nu uit invullen persoonsgegevens (incl bankrek nr), kopie legitimatiebewijs en overmaking van een geldbedrag naar spelersrekening. Geldbedrag dient afkomstig te zijn van een op naam gesteld betaalmiddel van de speler. Creditcards zijn toegestaan, mits deze op naam van de speler is gesteld en ter herleiden is tot het door hem opgegeven bankrekening nr.

Vragen:

- Aanbieders kunnen bij overboeking via creditcard niet altijd de gekoppelde bankrekening terugvinden. Hoe kan dit worden ondervangen om goede identificatie en verificatie te bewerkstelligen? Vb: bankafschrift?
- Zouden andere betaalmiddelen ook moeten worden toegelaten voor het identificatieproces? Zoals e-wallets?

5. Betaalmiddelen na identificatie en verificatie

MvT: Na inschrijving krijgt de speler een unieke spelersaccount met bijbehorende spelersrekening, die gekoppeld is aan één bankrekeningnummer, dat de speler bij inschrijving heeft opgegeven. Geld op de spelersrekening kan slechts afkomstig zijn van deze bankrekening of van een aan die bankrekening gekoppelde creditcard of elektronische portemonnaie (e-wallet). Eventuele prijzen worden bij uitkering op deze bankrekening gestort.

Vragen:

- Nu wordt ook het gebruik van e-wallets toegestaan. In hoeverre kan een aanbieder via een betaling met een e-wallet de gekoppelde bankrekening nummer zien? Indien dit niet te zien is, wat zou voldoende bewijs zijn om koppeling met bankrekening nummer duidelijk te maken? Is dit überhaupt wel nodig op grond van de wwft?
- Hoe vindt identificatie en verificatie plaats door psp's en e-wallet instellingen?
- Betaalinstellingen pleiten voor vervangen bankrekening door betaalrekening, aangezien niet iedereen over een bankrekening beschikt of gebruikt. Hoe kijkt DNB/ Fin hiertegen aan?

6. Kan de eis worden gesteld dat de speler moet beschikken over een bankrekening die gehouden wordt bij een bank (of betaaldienstverlener) die o.g.v. Wft beschikt over een vergunning? (Europeesrechtelijke risico's?)
7. Overige vragen



**Directoraat-Generaal
Jeugd en
Sanctietoepassing**
Directie Sanctie- en
Preventiebeleid

Datum
18th of September 2013

Projectnaam
Gambling

Notulist
5.1.2e

Meeting report

Description	Project Prevention of gambling addiction
Date and time	18th of September, 15.00 – 17.00 uur
Present	

5.1.2e

1. Advice on the building blocks

- Denmark and Belgium have legislation comparable with that in the Netherlands. 5.1.2e will sent the project team (MinVenJ) some legislations which are worth reading.
- There is a top 5 of leading researchers in the field of prevention. 5.1.2e and 5.1.2e have a few in mind for advisement on this project. Who and how are not quite sure. Their involvement can be on the building blocks as described by MinVenJ, or as a reaction on the views and recommendations made in the workshops. 5.1.2e will inform MinVenJ about how the researchers will be involved.
- In the preparation phase towards the workshops, MinVenJ will send working documents in Dutch to 5.1.2e 5.1.2e will filter discussion points or questions for the workshops from these document, and they will be translated to English with the foundation of the arguments. These discussion points are the basis for the advisement and discussion paper, and will be discussed during the project team meetings.

2. Stakeholders

- 5.1.2e will propose a list of the persons who should be invited to the workshops. 18 persons are maximum. MinVenJ will sent out the invitations, and arrange a room for the workshop.
- We favor persons from the operations at operators to visit the workshops.

3. Workshops

- The output as described on page 5 of the proposal count for every workshop. The discussion will be sent out directly after the workshop. The conclusions, analysis of 5.1.2e views and proposal about how the topics should be taken forward will be presented to MinVenJ three weeks after each workshop.
- The content for the final advice will therefore emerge from the previous phases of the project.

- Dates for the project team meetings (MinVenJ will sent out the invitations):
 - 2-10-2013 (15.00-17.00h): preparation for workshop 1
 - 31-10-2013 (12.00-16.00h): workshop 1
 - 11-11-2013 (15.00-17.00h): reflection on workshop 1 and preparation for workshop 2
 - 3-12-2013 (12.00-16.00h): workshop 2
 - 19-12-2013 (15.00-17.00h): reflection on workshop 2 and preparation for workshop 3
 - 8-1-2014 (12.00-16.00h): workshop 3
 - 28-1-2014 (15.00-17.00h): final meeting

**Directoraat-Generaal
Jeugd en
Sanctietoepassing**
Directie Sanctie- en
Preventiebeleid

Datum
18th of September 2013

4. Other

- MinVenJ will assure that the contract will be final as soon as possible.
- Contract is fixed price.



The Impact of Various Gross Gaming Revenue Taxation and Levy Rates on Gambling in the Netherlands – NB. Without Interactive Lotteries

Client: The Ministry of Security and Justice of the Netherlands

Date: 21 November 2013

Background

The Ministry of Security and Justice of the Netherlands has requested H2 Gambling Capital to run a number of scenarios based on different levels of taxation and levies on both the proposed interactive (Dot NL – to commence 1 January 2015) and existing land based gambling markets

The Ministry has also requested that H2 provide an estimate of the full declaration by licensed operators of their gross win and the payment of all the taxation and levies that are due.

Both taxation and levies are calculated based on Gross Gaming Revenues (which includes bonus payments). In addition, to the various headline taxation in the case of interactive gambling there is also a fixed 1.5% levy for the funding of the regulator and a further 0.5%-1.5% levy for a gambling addiction fund.

It is assumed that the Dot NL interactive gambling market will be very similar to the existing Danish Dot DK market where the pooling of international liquidity is permitted. Unlike the Danish market (where interactive horserace betting and bingo¹ are retained as monopolies) it is assumed that all aspects of the market with the exception of the lottery monopolies will be opened up online.

Three approaches have been employed to arrive at the likely scale and channeling to be achieved by the Dot NL Interactive Betting and Gaming Market:

- A – Optimal Case – Considers and adapts solely the Danish Dot DK market;
- B – Conservative Case Considers the Impact of a number of Dot Country markets around Europe;
- C – Blended Case – Calculated with respect to the mean of approaches A and B above.

Utilising just the Danish Dot DK market provides a comparison with the most positive dot country market to date – Whilst the Dot NL market will have similar rates of taxation and levies / technical requirements to the Dot DK market such as the ability to pool Dot Com liquidity H2 would warn against an exact comparison due to the fact that there will be possible target marketing restrictions, responsible gaming and a number of incumbent monopolies all of whom do not have not level of interactive presence that Danske Spil had in the pre-reregulated market.

¹ It is understood that there is still a debate as to whether existing licensed state lotteries may be the only entities able to offer interactive bingo in the dot NL market. Please refer to the end of this document for an estimation regarding what the impact of this would be on the data presented here.

It should be noted that the more conservative case (B) has the drawback that the dot country markets around Europe to date have seen differences in the products included, product launch timings, taxation regimes, pre-regulatory market developments, the relative strength of the incumbent monopolies and various time series of information. Using a selection of markets has tended to create a drag on potential market scale and channeling rates.

However, it was necessary to consider a blend of a number of onshore-regulated markets in order to create time series (only the first six month's data is available in respect of the Dot DK market at the time of writing) and also to consider the responsiveness of markets to changes in the taxation / levy burden.

NB. All of the Analysis for Interactive Gambling Includes Betting and Gaming Only (i.e. No Lotteries as any Interactive Lottery Activity will be Subject to the Land Based Lottery Taxation Regime)

APPROACH A – OPTIMAL CASE: DOT NL INTERACTIVE GAMBLING MARKET BASED ON ANALYSIS OF DANISH DOT DK MARKET

Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Dot NL Interactive Gross Gaming Revenues

Scenario 1a. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 0.5% for Addictive Gaming (€m)

Addiction Fund Contribution	0.5%	0.5%	0.5%	0.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	313.8	371.2	425.8	457.9
15%	265.2	311.6	355.3	379.1
20%	210.1	242.2	275.2	296.9
25%	173.5	197.7	222.9	240.2
29%	166.2	185.7	205.2	217.4

Scenario 1b. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.0% for Addictive Gaming (€m)

Addiction Fund Contribution	1.0%	1.0%	1.0%	1.0%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	309.4	365.4	418.7	450.2
15%	261.5	306.7	349.3	372.7
20%	206.4	237.8	270.0	291.2
25%	171.0	194.7	219.3	236.2
29%	163.7	182.7	201.7	213.6

Scenario 1c. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.5% for Addictive Gaming (€m)

Addiction Fund Contribution	1.5%	1.5%	1.5%	1.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	305.2	359.9	411.8	442.6
15%	257.8	302.0	343.5	366.4
20%	202.9	233.5	264.9	285.7
25%	168.6	191.7	215.7	232.2
29%	161.2	179.7	198.3	209.9

Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Interactive Channeling into the Dot NL Market

Scenario 2a. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 0.5% for Addictive Gaming

Addiction Fund Contribution	0.5%	0.5%	0.5%	0.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	95.5%	97.5%	98.4%	99.0%
15%	86.9%	89.6%	91.5%	92.6%
20%	75.0%	77.9%	80.3%	81.9%
25%	68.0%	70.4%	72.5%	74.1%
29%	65.0%	66.8%	68.5%	69.7%

Scenario 2b. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.0% for Addictive Gaming

Addiction Fund Contribution	1.0%	1.0%	1.0%	1.0%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	95.3%	97.3%	98.3%	98.8%
15%	86.5%	89.2%	91.1%	92.3%
20%	74.4%	77.2%	79.6%	81.2%
25%	67.2%	69.6%	71.7%	73.2%
29%	64.2%	65.9%	67.5%	68.7%

Scenario 2c. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.5% for Addictive Gaming

Addiction Fund Contribution	1.5%	1.5%	1.5%	1.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	95.1%	97.2%	98.1%	98.7%
15%	86.1%	88.8%	90.7%	91.9%
20%	73.7%	76.5%	78.8%	80.5%
25%	66.5%	68.8%	70.8%	72.3%
29%	63.4%	65.0%	66.6%	67.7%

APPROACH B – CONSERVATIVE CASE: DOT NL INTERACTIVE GAMBLING MARKET BASED ON ANALYSIS OF ALL EUROPEAN DOT COUNTRY MARKETS

Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Dot NL Interactive Gross Gaming Revenues

Scenario 1a. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 0.5% for Addictive Gaming (€m)

Addiction Fund Contribution	0.5%	0.5%	0.5%	0.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	274.8	282.0	285.5	293.4
15%	230.8	236.1	238.1	243.1
20%	172.3	176.0	178.5	184.5
25%	148.4	148.1	147.7	151.8
29%	132.2	129.1	126.4	127.9

Scenario 1b. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.0% for Addictive Gaming (€m)

Addiction Fund Contribution	1.0%	1.0%	1.0%	1.0%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	271.1	277.6	280.6	288.2
15%	227.7	232.4	234.1	238.8
20%	169.9	173.2	175.4	181.2
25%	146.4	145.8	145.2	149.2
29%	130.5	127.2	124.4	125.7

Scenario 1c. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.5% for Addictive Gaming (€m)

Addiction Fund Contribution	1.5%	1.5%	1.5%	1.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	267.4	273.2	275.8	283.2
15%	224.6	228.8	230.1	234.6
20%	167.6	170.4	172.4	178.0
25%	144.5	143.5	142.8	146.6
29%	128.8	125.3	122.4	123.6

Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Interactive Channeling into the Dot NL Market

Scenario 2a. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 0.5% for Addictive Gaming

Addiction Fund Contribution	0.5%	0.5%	0.5%	0.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	88.4%	93.9%	96.0%	97.0%
15%	74.9%	85.2%	88.5%	90.7%
20%	65.4%	74.0%	77.6%	80.0%
25%	50.0%	62.8%	67.5%	71.1%
29%	44.8%	57.1%	61.5%	65.0%

Scenario 2b. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.0% for Addictive Gaming

Addiction Fund Contribution	1.0%	1.0%	1.0%	1.0%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	88.0%	93.7%	95.8%	96.8%
15%	74.4%	84.7%	88.0%	90.3%
20%	64.5%	73.2%	76.8%	79.3%
25%	49.2%	61.9%	66.5%	70.1%
29%	44.0%	56.2%	60.5%	63.9%

Scenario 2c. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.5% for Addictive Gaming

Addiction Fund Contribution	1.5%	1.5%	1.5%	1.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	87.6%	93.5%	95.6%	96.6%
15%	73.8%	84.2%	87.6%	89.8%
20%	63.7%	72.4%	76.0%	78.5%
25%	48.4%	61.0%	65.6%	69.1%
29%	43.2%	55.2%	59.4%	62.8%

APPROACH C – BLENDED CASE: DOT NL INTERACTIVE GAMBLING MARKET BASED ON ANALYSIS MEAN OF SECTIONS A AND B

Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Dot NL Interactive Gross Gaming Revenues

Scenario 1a. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 0.5% for Addictive Gaming (€m)

Addiction Fund Contribution	0.5%	0.5%	0.5%	0.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	294.3	326.6	355.7	375.6
15%	248.0	273.8	296.7	311.1
20%	191.2	209.1	226.8	240.7
25%	161.0	172.9	185.3	196.0
29%	149.2	157.4	165.8	172.6

Scenario 1b. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.0% for Addictive Gaming (€m)

Addiction Fund Contribution	1.0%	1.0%	1.0%	1.0%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	290.2	321.5	349.7	369.2
15%	244.6	269.5	291.7	305.7
20%	188.2	205.5	222.7	236.2
25%	158.7	170.2	182.2	192.7
29%	147.1	155.0	163.0	169.7

Scenario 1c. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.5% for Addictive Gaming (€m)

Addiction Fund Contribution	1.5%	1.5%	1.5%	1.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	286.3	316.5	343.8	362.9
15%	241.2	265.4	286.8	300.5
20%	185.2	202.0	218.6	231.9
25%	156.6	167.6	179.2	189.4
29%	145.0	152.5	160.3	166.8

Impact of Various Taxation / Levy Rates (Base Gross Gaming Revenues) on Interactive Channeling into the Dot NL Market

Scenario 2a. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 0.5% for Addictive Gaming

Addiction Fund Contribution	0.5%	0.5%	0.5%	0.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	91.9%	95.7%	97.2%	98.0%
15%	80.9%	87.4%	90.0%	91.6%
20%	70.2%	75.9%	78.9%	81.0%
25%	59.0%	66.6%	70.0%	72.6%
29%	54.9%	61.9%	65.0%	67.3%

Scenario 2b. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.0% for Addictive Gaming

Addiction Fund Contribution	1.0%	1.0%	1.0%	1.0%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	91.7%	95.5%	97.0%	97.8%
15%	80.4%	87.0%	89.6%	91.3%
20%	69.5%	75.2%	78.2%	80.2%
25%	58.2%	65.8%	69.1%	71.6%
29%	54.1%	61.0%	64.0%	66.3%

Scenario 2c. Various Taxation Rates / 1.5% Levy for Regulation and an Additional 1.5% for Addictive Gaming

Addiction Fund Contribution	1.5%	1.5%	1.5%	1.5%
Gross Win Tax Rate	2015e	2016e	2017e	2018e
10%	91.4%	95.3%	96.9%	97.7%
15%	79.9%	86.5%	89.1%	90.9%
20%	68.7%	74.5%	77.4%	79.5%
25%	57.4%	64.9%	68.2%	70.7%
29%	53.3%	60.1%	63.0%	65.2%

Note Regarding the impact of interactive bingo being restricted to existing state licensed lotteries only

If interactive bingo were to be limited to solely domestic lottery monopolies it would be anticipated that the impact would be to reduce the total gross gaming revenues generated across all scenarios by between 7% and 8% - however, in Denmark there is just one monopoly (Danske Spil) whereas in the Netherlands with multiple lottery operators there would be some degree of competition so it would be reasonable to expect that the actual impact would be about half this level. Given the limited competition in the Netherlands it would be expected that across all of the scenarios explored above Dot NL channeling would be lower by about 3% in absolute terms.

Compliance in Respect of the Payment of the Full Taxation and Levies that are Due

As previously communicated to the Ministry H2 are not of the opinion that compliance in respect of payment of the full duties (based on our market forecasts for gross gaming revenue) will be an issue. We are of this opinion for the following reasons:

1. It is our knowledge that there has been no reports of such taxation / levy payment evasion in any of dot country markets to date –if there were to be it would be assumed that any offending operator would incur not just the amounts of taxation / levies due but additional fines which if not paid would lead to their license being revoked;
2. H2's analysis of the potential Dot NL market is based on the take up in other dot country markets and so even if this was thus far an undetected issue its impact would be reflected already within our forecasts;
3. It is H2's view that any potentially bad actor that intends not to pay all of the taxation and levies due would not go through the process and associated costs of gaining an onshore Dot NL license and would attempt to continue to try and service the market from out side of the Netherlands;
4. The vast majority of organisations that are expected to apply for a Dot NL license will be one or more of the following: listed on the public markets, a Dutch registered company or hold gambling licenses in other jurisdictions and so would not want to risk the impact being non-compliant could have on other aspects of their business.

Therefore H2 believes that our forecasts for the gross gaming revenue generated by the Dot NL market will translate into collected taxation and levy income. However, it should be noted that we would be of the belief that in line with other forms of taxation evasion it would be far more likely to occur as the rates of taxation / levies were increased to levels that would make the market less or even un-economical for operators.

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It should be noted that as an updated version of the original Report all of the summary statistics contained within this report have been updated in order to take account of H2 Gambling Capital's revised forecasts for the industry. Although every effort has been taken in order to ensure that all figures outlined within the report have been updated H2 Gambling Capital take no responsibility for any that might have been missed during the re-editing process.

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Client contact

One of the objectives of the Dutch games of chance policy is consumer protection. Players have to be able to make a deliberate choice if they want to participate in remote games of chance and with which provider they want to play. The license holder must make sufficient information available about, for instance, the nature of the games of chance offered, the costs of participation and where the consumer can turn to for queries and complaints.

In the case of consumer protection, it is very important that the player can have contact with the operator. There are different ways in which a player and an operator have contact with each other, for example:

- Through (direct) marketing
- Through contact the player when signs of risky playing behavior are detected
- Through questions from players by:
 - Chat
 - Phone
 - E-mail
 - Forum postings
- Through complaints

It should be always possible for a player to get in contact with an operator. There are certain principles that should be taken into account when it comes to contact between operator and player:

- I. The ways in which the player can search contact with the operator, should always be transparent and easily accessible for the player. In particular, the information about the complaints procedure should be one of the items in the standard information package for the player.
- II. All information about the different possibilities to search contact with the operator, should be in plain Dutch so it is easy to understand for the player.
- III. The contact should always be possible in Dutch language.
- IV. Whenever a player wants to, they should have the possibility to get in contact with the operator.

Preparation

Can you provide us with a brief description about all the different types of customer contact made by your company. Please provide these during the workshop.

Discussion points

- If we want to make sure that players should always have the possibility to get contact with the operator, what are the requirements for that?
- Do you have any expectations from the Dutch authorities to make the above possible?
- What is your opinion about the relation between the different types of player contact and responsible gaming?
- How can we construct a regular dialogue between operators, prevention care and gaming authority?

Points to keep in mind

- ! The subject of client contact is interlinked with training requirements for the employees at the operator's side.
- ! The ways in which the contact with the player is organized should have a place in the prevention policy of the operator.

Help with responsible gaming and guidance to care

When we take a look at the stepped care model, helping the player with responsible gaming and the guidance to care is an important feature. Operators should be equipped to identify risky playing behaviour in time and respond with an appropriate intervention. For some players, that intervention will not be sufficient to encourage responsible gaming and the guidance to care is required to help in the consideration of further options. This could be on advice of the operator, but also on the request of the player. This guidance to care is also one of the objectives laid down in the Explanatory Memorandum to the draft bill.

To encourage players to the maximum to find help in professional care, it is important to provide information about help at the right moment and in the right way. This means that guidance to care is interlinked with training and knowledge about responsible gaming and recognizing risky playing behaviour.

In the options for professional help and care, we see a distinction between:

- The care options that the operator may offer to the player that he has in-house
- The care options that the operator can offer, but does not have in-house (for this, the operator should have proper information about the possibilities of care in the Netherlands, and the ways in which a player can find/get in contact with these possibilities/organizations).

For the guidance to care and help with responsible gaming, we make no distinction between the land-based and online providers, since the opportunities and care options are equal for both parties (except the player profile). We see the following possibilities:

1. The operator makes information about the help and where the player can go for this help available at all times. In this way, the player may if necessary or desired, seek help on his own initiative.
2. A player contacts the operator with questions about available help and treatment options.
3. The playing behaviour gives reasons to guide the player to (self) help or care options. The operator should provide this information when he contacts the player.
4. If the player wants a voluntary exclusion. The operator should inform the player about the ways in which he can seek help to make a difference to his playing behaviour and advises him about suitable options.
5. When an operator excludes a player directly. This player should always receive an information package about possible help and care.

The care organisations and operators should have a continuous dialogue about their cooperation and work together to ensure that a player gets the personal motivation to work on playing in a responsible way.

Discussion points:

- What are best practices from other countries to form this dialogue?
- What kind of information do operators need from addiction care in the Netherlands?
- What does the addiction care needs from operators?
- What are next steps concerning this topic?

Duty of care – Promotional activities (advertisement, incentives and rewards)

The following article applies to license holders that operate a land based casino and/or gaming machines, and to license holders that offer online games of chance and/or online betting services.

Article 4a in current Betting and Gaming Act

Section 1: The holders of a license on the basis of this betting and gaming act should take all necessary measurements and provisions which are required to prevent addiction in the games they organize.

Section 2: The holders of a license on the basis of this betting and gaming act employ a balanced and conscientious manner of advertising, with particular caution to excessive gaming.

Section 3: A balanced and conscientious manner of advertising, as stated in section 2, refers at least to a manner of advertising that is not deceiving and is accompanied by:

- a) a warning for the risk of excessive gaming;
- b) a statement on the statistical chance of winning a prize;
- c) an indication as to whether there is a non-recurring participation or a continuous participation until the participation is terminated.

As you know, the main goals of the current and the future Betting and Gaming Act are:

- Preventing gambling addiction
- Safeguarding consumer protection

To reach those goals the Ministry needs gambling operators to implement a Responsible Gaming policy that focusses on reaching those goals. This means that, as stated in article 4a of the current Betting and Gaming Act, that operators have a duty of care towards players.

Advertising

Based on that duty of care, operators may not advertise their offered games of chance in a unclear or deceiving manner, or in a manner that might encourage excessive playing behavior. Licensed operators will be deemed responsible for all advertising done on their behalf by their subcontractors, affiliates and any other third party organizations providing gaming software to the operator.

There are some provisions in lower legislation regarding the content of the advertisement, as well the manner of advertising:

- I. A gambling operator may not aim his advertising activities at groups of socially vulnerable persons. A group of socially vulnerable persons refers at least to persons younger then 24 years old and persons with indications of risky gambling.
- II. Advertising activities may not be connected to goods and services of third parties that are specifically targeted at groups of socially vulnerable people.
- III. Advertising activities that are aggressive and deceiving are prohibited.

We would like to discuss with you the following:

The Ministry wants to further specify the duty of care regarding advertising activities in lower regulations. With this paper, we are proposing some minimum standards. For example:

- IV. Before applying direct marketing, or before aiming advertising activities at his known customers, a gambling operator must check his database for customers with whom the gambling operator in the past had an intervening conversation. When an intervening conversation with that customer had given reason to suspect excessive gambling or troubled gambling, the gambling operator must refrain from sending advertising activities at that customer.
- V. Online promotional activities and online advertising activities should not be aimed at places/websites/applications that are frequently visited by groups of vulnerable people, or that are frequently used by groups of vulnerable people.

Preparation

Can you provide us with an example of socially responsible advertisement by your company. Please provide these during the workshop.

Discussion points:

- What are the most effective ways to prevent advertising activities reaching groups of vulnerable persons like young adults and players who show excessive playing behavior?
- Should there be a general guideline/norm for the content of advertisement (e.g. using young adults in an advertisement)?
- Should there be a general guideline/norm for the manner of advertising activities (e.g. banners on certain sites or apps, regarding free playing sites and under age players, etc.)?

Incentives and rewards

The Ministry acknowledges that offering incentives and rewards are indispensable for an attractive legal offer of remote games of chance. On the other hand, based on the aforementioned duty of care, gambling operators may not give players incentives and rewards in a manner that might elicit excessive playing behavior. In that regard, the **explanatory memorandum** states clearly that bonuses cannot be tuned to the player's individual gaming behaviour. This should prevent players from being personally tempted to continue playing at vulnerable moments, for instance right after the loss of money.

In addition to that, based on the duty of care, the conditions for obtaining the incentives and rewards must be clear and may not be misleading in any way. The operators are responsible for any type of promotional advertising done by their subcontractors, affiliates and any other third party organizations.

We would like to discuss with you the following.

The Ministry wants further specify the duty of care regarding advertising activities in lower regulations. With this paper, we are proposing some minimum standards. For example:

- I. When the player registers as a new player, the operator must provide the player the choice to opt-in before any marketing materials, or incentive or reward is sent out. Furthermore,

when a player is registered, the operator must provide the possibility to opt-out so that the player does not receive any offers for incentives and/or rewards.

- II. An offered incentive and/or reward may not be misleading. Therefore an offer must be accompanied with information about the scheme or the structure of the incentive and/or reward and about the conditions for obtaining the incentive and/or reward in a way that is easily understandable, especially for new players.
- III. The gambling operator must act in a socially responsible manner when offering an incentive and/or reward. The incentive and/or reward may not elicit excessive playing behavior. Therefore an incentive and/or reward may not be offered to a person who in the past period has shown signs of risky playing behavior (e.g. chasing losses, exceeding limits in player profile, treating guests and staff rudely).
- IV. The operator must prevent offering incentives and/or rewards to vulnerable groups. This includes persons who have asked the operator to be excluded, or persons who have been excluded by the operator, or who have showed other signs of problems that have been detected by the monitoring systems that the operator is using.

In addition to aforementioned provisions, online gambling operators must prevent offering incentives and/or rewards to persons who have reached one of the limits of their player profiles in the last month.

Furthermore, they must refrain themselves from offering incentives and/or rewards, when a customer is filling in his player profile. Also, the operator may not offer incentives and/or rewards on the webpages:

- that give information about responsible gambling and/or that contains a self test for troubled gambling.
- that give information about addiction care and treatment options,
- where the player can exclude himself, or ask the operator for an exclusion or a time out.
- on the player's "my account" page.

Preparation

Can you provide us with examples of incentives and rewards offered by your company, and can you explain in what way social responsibility plays a role in offering incentives and rewards? Please provide these during the workshop.

Discussion points:

- What are the most effective ways to prevent incentives and/or rewards being offered to groups of vulnerable persons and players who show excessive playing behavior?
- Should young adults (18-24 year) be included in the group of vulnerable persons, so that they are not getting offers for incentives and/or rewards.
- What are the most effective ways to prevent incentives and/or rewards from eliciting players into playing excessively?
- Should there be a general guideline/norm for the content of incentives and/or rewards, e.g. maximum amount, maximum numbers of incentives in a certain period?
- Should there be a general guideline/norm for the scheme, or the manner in which incentives and/or rewards are offered and are obtained?

A Possible Risk Assessment Protocol

If a company wishes to use a Risk Assessment procedure, then this protocol for a Social Risk Assessment (SRA) process could apply to all products and advertising promotions. It has been adopted successfully by two online companies so far.

It can be used by all relevant managers in consultation with the Responsible Gambling Manager (the SRA Champion) or equivalent role in your company. This post-holder should have ultimate ownership of and responsibility for the SRA.

The SRA involves a graduated process:

Level A Assessment

Level A Assessment is expected to account for the majority of assessments and is essentially concerned with the delivery stage of products and promotions. It is a checklist and test exercise for the project managers who are in charge of the early stages of new product or promotion development. This level will include the following categories of projects / initiatives:

- Substantive variations to existing products
- Variations or updates to existing (and therefore approved) advertising campaigns or promotions

If it is unclear whether the project falls under this level, the SRA Champion will assess and consult with the relevant project manager to determine the appropriate level.

If a project falls under *Level A*, *Step1* must be completed by the relevant project manager:

Step 1- Questions:

1. Are the Company player protection tools built into the product?
2. Are the links to the Responsible Gambling page in place?
3. Has sign off for the promotion been obtained from the Legal team through normal approval processes?

In order to pass the *Level A* Assessment, the answer to all three questions must be "Yes." Once the checklist has been completed, it is forwarded to the SRA Champion for review and sign off and a copy is retained with the project file.

If the project fails the *Level A* Assessment, it does not proceed until revisions have been put into place that should enable a *yes* to be answered to all questions and the project to pass the *Level A* assessment.

Level B Assessment

A *Level B* Assessment is expected to account for 20-30% of all assessments completed. It will involve meetings between the product/promotion project team and the Responsible Gambling (RG) team at an early stage in the design of the project. It is important that RG principles are

built in at the concept/early design stages, to consider the design, audience, targeted customer, marketing approach and commercial impact. This level will apply to:

- All new products
- New advertising campaigns or promotions regardless of media used
- Any product or promotion that has been the subject of a third party complaint
- Any product or promotion that in the view of the SRA Champion should not have passed *Level A*
- Existing products being presented for the first time in in new jurisdictions

If a project falls under this level of assessment, the following three steps must be completed by the SRA Champion working with the project manager:

Step 2- Further Questions:

1. Does this product align with the principles of the company RG Charter or equivalent document (see Appendix 1 below for an example of an RG Charter)? **Yes /No**
2. Does this advert or promotion align with the requirements of the Ethical Advertising/Marketing Guidelines or equivalent document (see Appendix 2 below for an example of such Guidelines)? **Yes /No**
3. Will it avoid targeting minors and vulnerable groups? **Yes/ No**
4. Will it support or have a neutral impact on existing Company programmes to prevent problem gambling? **Yes/ No**
5. Has a similar product/promotion been free from regulator criticism or sanction? **Yes/No**
6. Will this initiative enhance the reputation of Company as a socially responsible operator? **Yes /No**

Step 3 - Detailed Information Assessment:

The SRA Champion gathers information about the impact of similar products initiatives / projects, or equivalent document (see Appendix 1 below for an example of an RG Charter). This may include: briefings, research reports, market assessments, expert opinions, etc. The information provided as a result of this step should include every reference available that directly relates to the new initiative being undertaken.

The findings will be summarized into a concise briefing note. The format should include an explanation of the project, a synopsis of the findings of the jurisdictional review and an informed hypothesis of what is believed to be the social impact of the project.

Step 4- Internal Situational Analysis:

The following questions are to be answered based on the analysis from the information gathered in Steps 1 to 3 and documented accordingly:

1. Completed *Level A* assessment questions?
2. What is the demographic profile and risk profile of the target audience / customer?
3. Will this inappropriately entice play by minors or vulnerable groups? Why or why not?
4. What is the view of external stakeholders (problem gambling NGOs church groups etc)? Do they need to be formally consulted / engaged? How and when?
5. What are the top three RG and top three public relations risks? How will they be managed?

Submissions for a *Level B* Assessment may be elevated to a *Level C* Assessment based on the SRA Champion's analysis of the item.

In order to pass a *Level B* Assessment, Steps 1 to 4 must have been completed and any necessary alterations made to the project.

***Level C* Assessment**

All remaining assessments fall under this level and will usually apply to the adoption, by the Company, of a new type of gambling offer not currently part of the product suite.

If a project requires a *Level C* Assessment, all steps of the *Level B* Assessment must be completed in addition to Step 5 below which is obtaining an external expert review, and in some instances, Step 6.

Step 5- Expert Review

This step should be taken if a new product or program is being introduced or a new distribution channel being launched. If it is uncertain whether expert review is required, the RG Champion should project manage this process.

- Independent academic experts are selected. This can be done by consulting with xxxxxxxx.
- An information briefing will be prepared, providing a top-line summary of the product/concept/ issue to provide to the experts.
- A briefing will be provided to each expert asking for their advice, expert opinion and feedback in writing (either via email or, if necessary, a more formal report) on the following questions:

1. Are you aware of any research that has been conducted in other jurisdictions which examines the impact of the product / concept / issue on player behaviour / awareness / attitudes? If you are familiar with such research, what were the results?

2. Based on your knowledge and understanding of the product / concept / issue, do you believe the product / concept / issue will have an effect on problem gamblers either positive or negative and does the product / concept / issue correlate to problem gambling?

3. Do you have any suggestions on responsible gambling features, initiatives or components that could be incorporated into the product / concept / issue that would make it more socially responsible?

4. What is your opinion on whether or not this is a socially responsible product / concept / project / approach to undertake in the jurisdiction(s) in question?

5. What are your recommendation(s) for next steps?

After all steps have been completed, the information collected should be synthesized into a report that reaches clear conclusions about the social impacts and net positive benefits, and makes recommendations about whether or not to proceed. The submitted report will be reviewed by the SRA Champion. Feedback on the report will be provided within seven working days of receipt.

Step 6 - Primary Research (as required)

If there are any issues of significance raised by Steps 1 through to 5, a decision should then be made to conduct primary research in the relevant jurisdictions to fully explore the social impacts of the product / initiative in question. This would involve a full research plan with clear outcome measures, an evaluation strategy and expert review of the approach. Once complete, the assessment will be submitted to the SRA Champion for review.

In order to pass a *Level C* Assessment, steps 1-6 must be completed and any identified revisions made to the project.

Appendix 1- Example Company Responsible Gambling Charter:

Company X seeks to ensure that its employees, customers, their families and wider communities are protected from problem gambling. Company X takes a broad public health definition of problem gambling, seeing it as difficulties in limiting the time or money spent on gambling, resulting in a range of adverse social and psychological consequences for the gambler his or her family or community.

Therefore Company X will make best endeavours to:

1. Integrate social and environmental concerns in to the way it does business as it seeks to build trust and enhance the well being of its employees, customers, their families and communities
2. Protect its customers, their families and communities from problem gambling
3. Educate customers about the potential dangers of problem gambling, the nature of wagering and games of chance and ensure that those who need help get it

4. Ensure that products and promotions are assessed for their impact on the health of customers, their families and communities and ensure that only those that pass the assessment are implemented
5. Refer to an independent panel of experts to advise on the development of our Responsible Gambling Initiatives
6. Make anonymised data available data to researchers who are trying to further public knowledge about gambling related harm
7. Consult regularly with stakeholders to evaluate the effectiveness of the Responsible Gambling and report findings in the Corporate Annual Report.

Appendix 2 – Example of Ethical Advertising Guidelines

General Comments: Company X customers have a right to expect our advertising and marketing to be truthful respectful and sensitive. They should also be able to expect Company X to make best endeavours to ensure that vulnerable groups and minors are not harmed by problem or underage gambling.

PART ONE: GENERAL PRINCIPLES

Advertising and marketing campaigns must:

1. Emphasise the entertainment aspect of gambling and not focus unduly on winning as a likely outcome of play.
2. Contain any important and relevant information about the product that may be essential for customers to make informed choices about using it or not.

For example: a promotional competition needs a guaranteed, detailed prize for the specific finishing place. Customers must be told what spend is required to reach a promotion participation target and an explanation how this is calculated. This must include clarification of how long the offer is valid, and what is the resultant benefit, if it is a discount, then what this discount is applicable for etc. This allows our customers to make an informed decision whether they can or want to achieve the promotion, and what is required to do so.

3. Describe prize amounts and potential winnings accurately and not in any way that is intended to conceal a commercial intent.

Information describing benefits of a promotion should be an entirely accurate representation of what can be gained.

4. In casino and arcade games information should be available on the true odds of winning and should be stated in a clear and simple way.

Details of where this information can be found should be made available to customers on the opening page.

5. Include a visual responsible play message, particularly in print and TV advertising, such as: *'please gamble responsibly'*

Advertising and marketing campaigns must not:

1. Exaggerate the chances of winning or encourage gambling beyond one's means. Material content should not advertise an increased likelihood of winning above the true odds.

Wording should not include statements such as 'Money is coming your way'; 'You can be rich' which could give an impression that customers will achieve something not already guaranteed.

2. Portray, condone or encourage gambling behaviour that suggests peer-pressure to gamble
3. Imply that financial rewards are a likely outcome of gambling
4. Suggest that gambling can be a solution to financial concerns, an alternative to employment or a method to achieve financial security
5. Promote gambling as an alternative to employment or financial investment
6. Suggest that gambling longer will increase the chances of winning
7. Discriminate on race national origin, religion, gender, sexuality, disability or appearance or imply disrespect for any identifiable person, group or segment of society
8. Exploit cultural beliefs or traditions about gambling or luck or suggest gambling as a rite of passage.
9. Contain scenes which ridicule persons who choose not to gamble
10. Portray gambling as indispensable or as taking priority in life, for example over family and friends or professional/educational commitments
11. Depict gambling as a way to enhance/improve self-esteem, social standing or sexual prowess
12. Suggest a link between gambling and seduction, sexual success, enhanced attractiveness, resilience, recklessness or show it in a context of toughness

13. Depict gambling as a means of escaping from personal, professional, educational, social or emotional difficulties, loneliness or depression
14. Show the consumption of alcohol while gambling
15. Condone or feature gambling in a working environment
16. Imply any illegal activity whatsoever.

PART TWO: PROTECTING MINORS

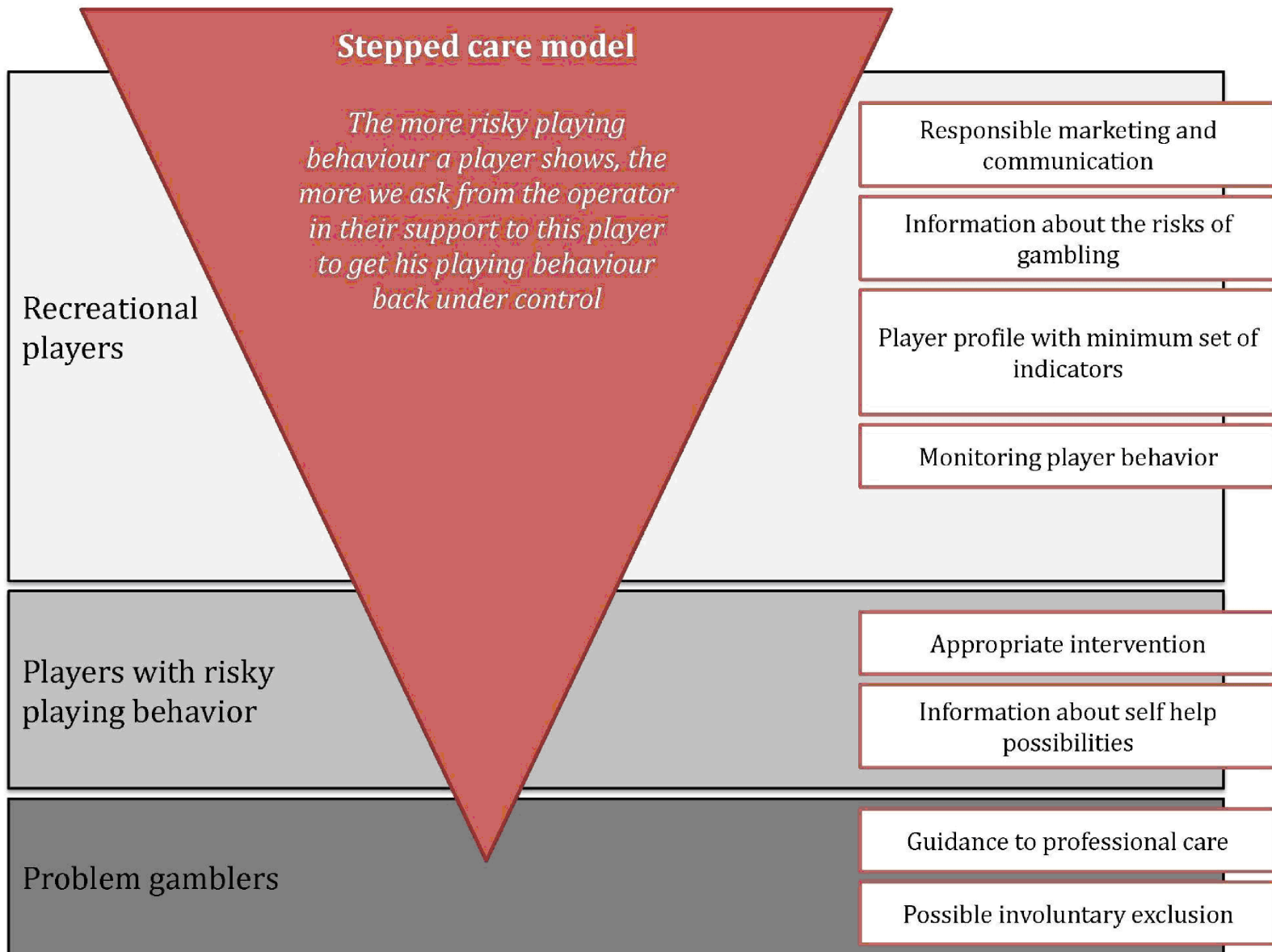
Company X recognises that gambling is not for children and that minors must be protected against gambling advertising and marketing campaigns. The target for all campaigns must be adult audiences. The problems associated with young people gambling are becoming increasingly apparent. Rates of problem gambling amongst minors are approximately twice that of the adult population.

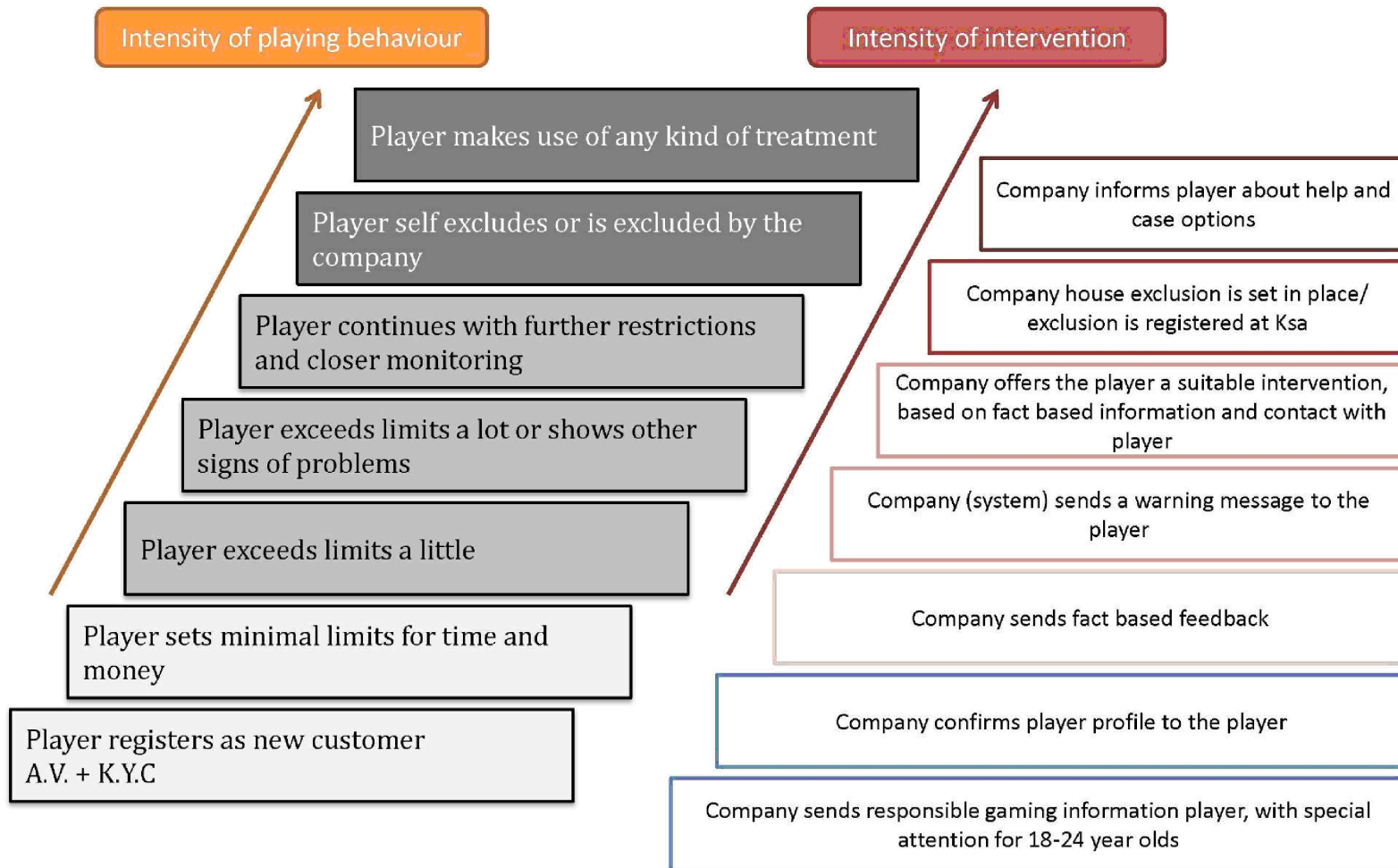
The impact of advertising and marketing techniques on youths has been acknowledged in the fields of alcohol and tobacco. Consequently such advertising is strictly monitored in most jurisdictions. The following guidelines are recommended to reduce the impact of this advertising on youths and protect this vulnerable population from harm:

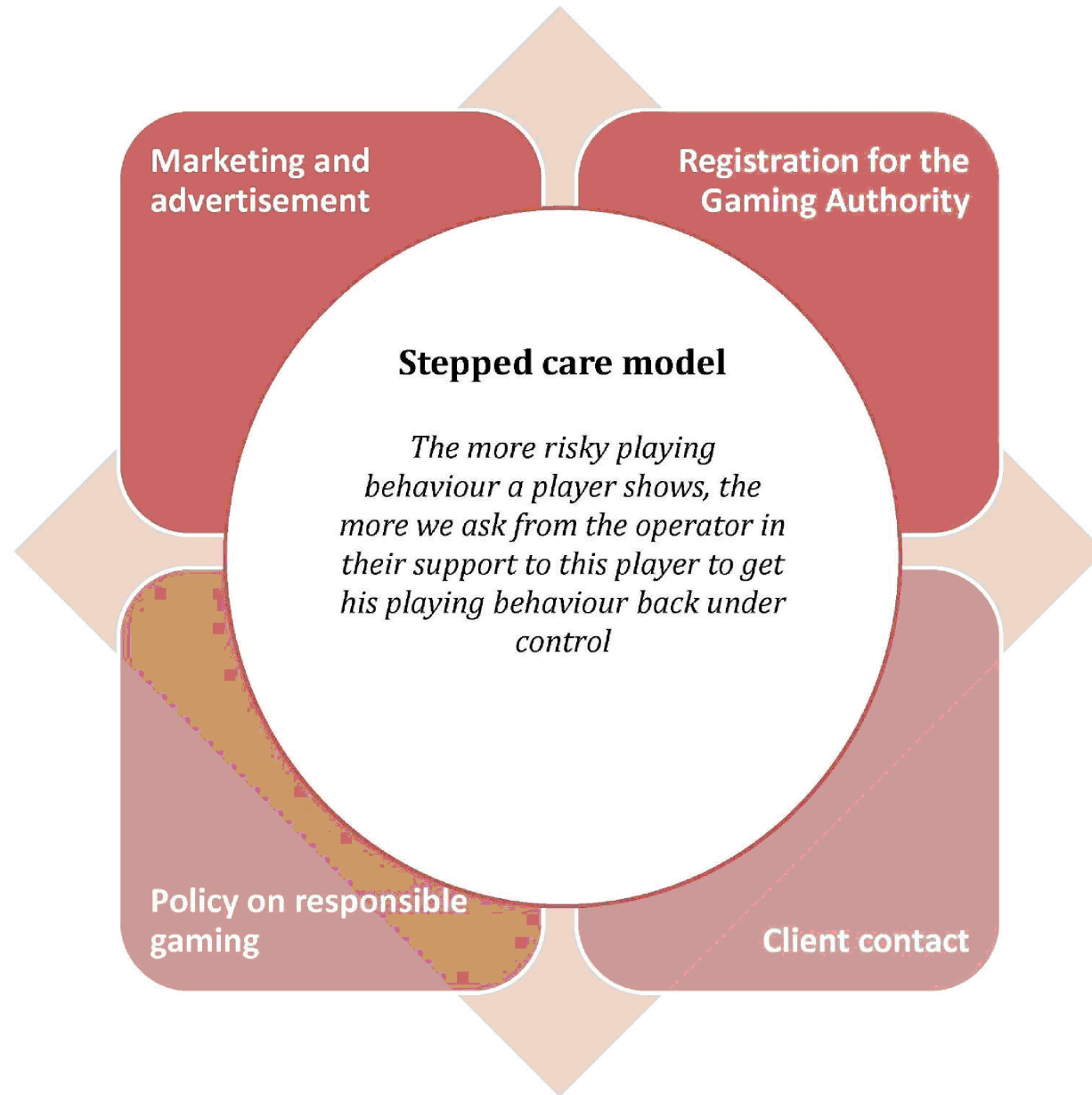
All Advertising and promotions must include visual messages regarding the legal age for playing.

Advertising and promotions must not:

1. Be displayed on any form of media where more than 20% of users are minors
2. Be geared towards minors
3. Promote or advertise the Company name or products, including naming rights, branding, and logos through the sponsorship of sporting teams and events where minors are likely to constitute any more than 20% of the fan base or audience
4. Use product endorsements from individuals and characters who are likely to appeal to youths and therefore increase the likelihood of youth gambling involvement
5. Exploit the aspirations, inexperience and lack of knowledge of minors or other vulnerable persons
6. Use child-oriented graphics, including animals and cartoons, music, and youth themes such as board games, based on themes or use themes intended in their original conception, to appeal to minors. The only exception to this is in sending promotions to bona fide age verified customers.
7. Use actors who appear to be under 25 years of age.









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Towards Individualized Player Protection

5.1.2e

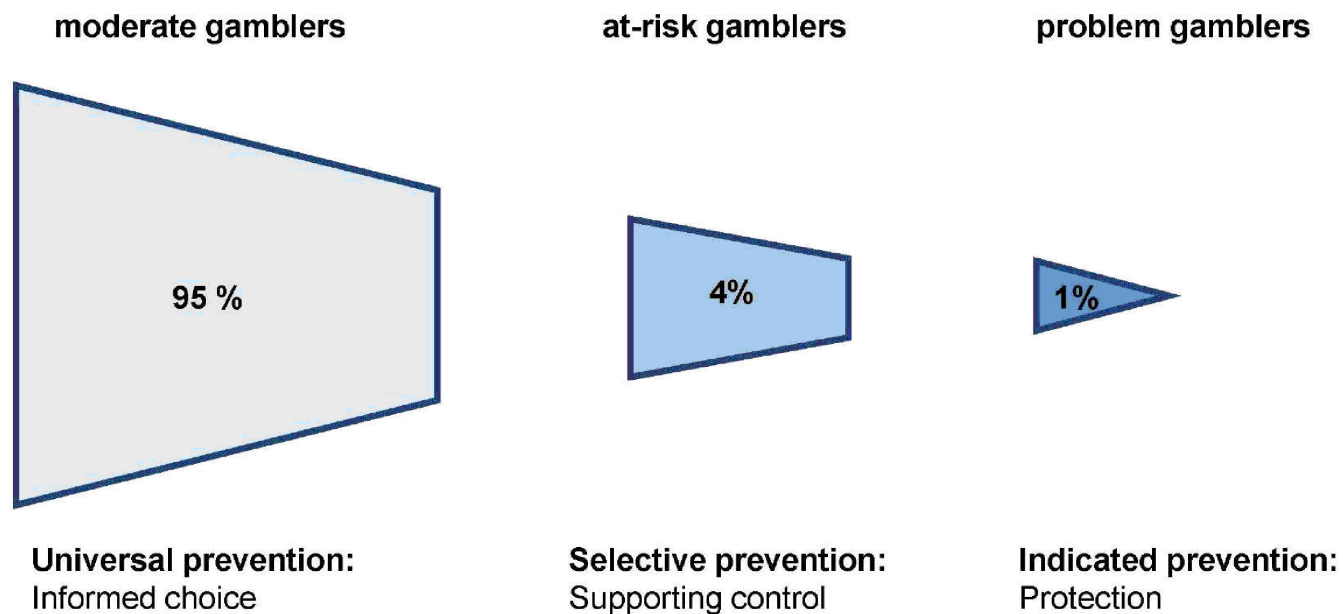
The Hague, 03/12/2013

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Regulatory positions on consumer protection

	Self-responsibility model	Imposed protection model
Relies on ...	informed choice	imposed protection
Example ...	Players must be informed and pre-commitment tools must be offered.	Uniform safe gambling limits are imposed on all players.
Shortcomings ...	Players who are unwilling to accept protective measures, are unprotected.	The majority of players is hugely overprotected, rendering the licensed gaming offers unattractive.

Individualized consumer protection based on a Public Health model



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Account-based gambling

All gambling **transactions** in the internet are **monitored and saved** in real time and **linked to a player account** which again is **linked to an identified 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**
- Use of **responsible gambling tools**
- Use of **payment methods**, patterns in **deposit and withdrawal behavior**

We can speculate a lot about what could be a valid indication for the early detection of gambling related problems, but very few patterns have so far been validated in real gambling data.

Validation Design

Predictor Groups

Criteria



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Validity of Prediction

	Predicted: moderate	Predicted: at-risk
Reality: moderate	Correct rejection	False Alert
Reality: at-risk	Miss	Hit

Validity of Prediction

Higher validity model:

	Predicted: moderate	Predicted: at-risk
Reality: moderate	410	110
Reality: at-risk	90	390

Hit rate: 80.0 %

Lower validity model (“guessing”):

	Predicted: moderate	Predicted: at-risk
Reality: moderate	280	240
Reality: at-risk	220	260

Hit rate: 54.0 %

'Needle in the Haystack' - Problems

Is this a valid model?

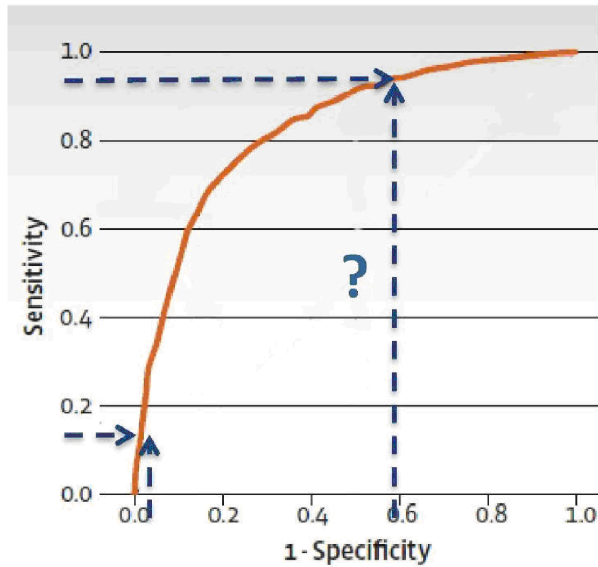
	Predicted: moderate	Predicted: at-risk
Reality: moderate	940	10
Reality: at-risk	48	2

Hit rate: 94.2 %

Sensitivity: 4 %

Specificity: 99 %

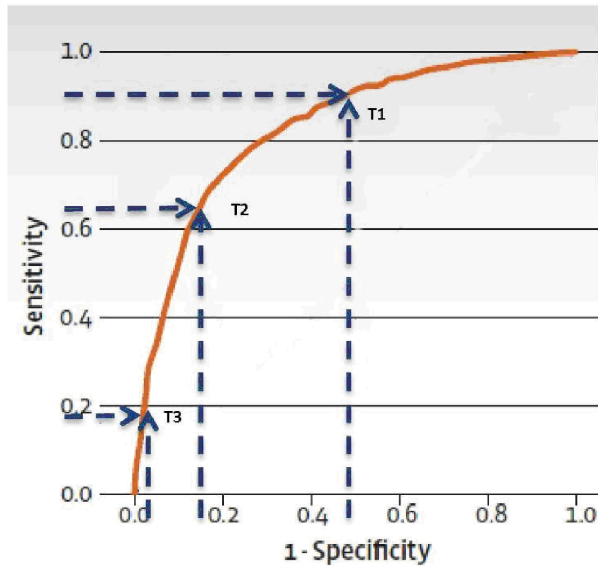
Classification Compromises



Highly specific model:

- * will achieve a very high hit rate
- * will however miss the majority of the potentially problematic gamblers
- * is therefore limited to non-invasive measures

Classification Compromises



Tier 1 intervention:

- * Creating problem awareness
- * High sensitivity, low specificity
- * 10% of the targeted players are actually at risk

Tier 2 intervention:

- * Interrupting gameplay, providing feedback
- * Balanced sensitivity & specificity
- * 20% of the targeted players are actually at risk

Tier 3 intervention:

- * Detailed case investigation
- * Can lead to the imposed exclusion of the player
- * Moderate sensitivity, high specificity
- * 40% of the targeted players are actually at risk

Tier-1 Intervention

bwin



Being responsible for your own action makes you a free person!

Set a deposit limit now!

Hi ##F_FIRST_NAME##
(##F_GENERIC5##)!

In every game, there are rules you should not break, especially if they are related to security. So always make sure that fun and safety are in balance.

Now let's go on with the good stuff! Check out our new games and always remember: acting responsibly is what makes you truly free!

Your bwin team

Play by your own rules:

- Focus on gaming! Play only when you are balanced and concentrated, not when you are distracted or depressed.
- Don't drink and play! Never play under influence of alcohol, medication or other narcotics that could make you lose your nerve.
- Take a breather! Regular breaks from playing give you a healthy distance.
- Keep an eye on your money! Set targets before you start playing: what's the amount you want to win or lose at most?
- Set your deposit limit and stick with it. Your setting becomes effective at once. If you want to raise your limit again, it takes three days. Your chance to reconsider.

If you want to know more about player protection at bwin, have a look at our [Responsible Gaming page](#).

18+ 

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Tier-2 Intervention

The screenshot shows the bwin website interface. At the top, there is a navigation bar with links: "Help", "Contact", "Responsible Gaming", "My account", "Deposits", "Withdrawals", and "Log out". The user's balance is displayed as "134.91 EUR" and "27 points". Below the navigation bar, the main menu includes "Sports", "Poker", "Casino", "Games", and "Live Casino > Live betting". The background features a collage of sports-related images, including a soccer player and a basketball player. A prominent "Responsible Gaming message" overlay is centered on the screen. The message text reads: "During the previous 30 days you have displayed gaming patterns that can also be found among players who have later decided to self-exclude because of gambling-related problems." Below this, it states: "This message was triggered by an algorithm developed by the Division on Addiction of Harvard Medical School." and "Find out more about this message on our Responsible Gaming page." At the bottom of the overlay is a button labeled "Unsubscribe from Responsible Gaming messaging". A "Remind later" link is also visible in the top right corner of the message box. In the background, a betting slip for "Real Madrid - Barcelona FC" is visible, showing a 3-way bet with odds of 2.27, a stake of 100.00, and possible winnings of 227.00 EUR. Other promotional banners for "Early Payout" and "NFL Rock and roll to the playoffs?" are also present.

Help Contact Responsible Gaming My account Deposits Withdrawals Log out 134.91 EUR 27 points

bwin Sports Poker Casino Games > Live Casino > Live betting

Online betting on Serie A
Pre-Christmas cheer in S

Real Madrid - Barcelona FC
3-way: Real Madrid
Odds: 2.27
Stake: 100.00
Possible Winnings: 227.00 EUR
202.27 EUR Pay out

Early Payout
The time has come to push the button!

NFL
Rock and roll to the playoffs?

Responsible Gaming message

Remind later

During the previous 30 days you have displayed gaming patterns that can also be found among players who have later decided to self-exclude because of gambling-related problems.

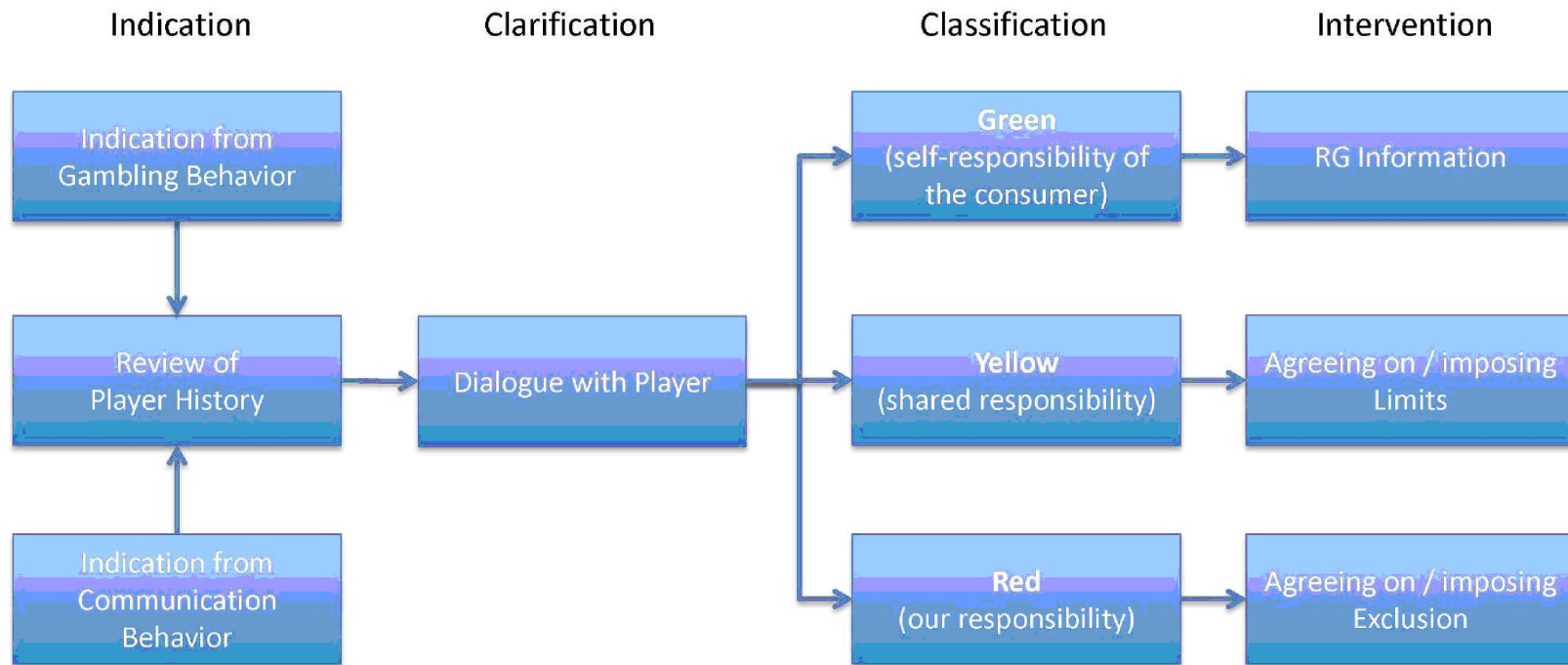
This message was triggered by an algorithm developed by the Division on Addiction of Harvard Medical School.

Find out more about this message on our [Responsible Gaming page](#).

Unsubscribe from Responsible Gaming messaging

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Tier-3 Intervention





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5/12 Gesprek met 5.1.2e en KSA.

5.1.2e heeft veel gespeeld bij diverse legale aanbieders van sportweddenschappen in de UK. Zijn ervaringen zijn de volgende:

- 5.1.2e ontving veel aanbiedingen (1 keer per week) via mail en SMS.
- Het ontvangen van aanbiedingen voor bonussen leek maar in beperkte mate afgestemd te zijn op speelgedrag. 5.1.2e had niet de indruk dat winst of verlies veel uit maakte. Wel kreeg hij veel aanbiedingen/advertenties als hij een tijd niet gespeeld had. Verder kreeg hij meer aanbiedingen naar mate hij meer speelde.
- Bij inschrijving zijn aanbiedingen voor bonussen/advertenties standaard ingesteld als Opt In. 5.1.2e vindt dat speler dit zelf expliciet moet instellen. Unsubscriben moet verder ook een duidelijk en eenvoudig proces zijn, en bijvoorbeeld niet een procedure zijn waar er voor elk afzonderlijk product (sportsbetting, casinogames, bingo, etc.) uitgeschreven moet worden.
- 5.1.2e ziet als addictive features van bonussen, de onduidelijke, 'condtions', met name de bonussen waarvoor er meerdere inzetten (rollovers) zijn vereist voordat deze verzilverd kunnen worden. 5.1.2e ervaarde dergelijke conditions als misleidend.

Verder gevraagd naar mogelijke indicatoren van problematisch speelgedrag 5.1.2e noemt:

- Meerdere keren per dag geld storten (chasing losses)
- Change of games/types => De keuze voor verschillende spelletjes moet in het spelersprofiel, dit betekent ook geen advertenties/bonussen voor niet geselecteerde kansspelen. Zo wordt speler ook niet getriggerd om bijv. tussen sportwedstrijden andere casinospellen te spelen.
- Tijdstip niet perse een grote indicator (kansspelen internationaal en verschillende tijdzones)
- Aantal log ins is redelijke indicator
- Inzet per week een goede indicator (per dag te korte termijn)

Overige punten:

- KSA vindt Stepped bonus verplichten goed idee -> verhoogd de transparantie. Roll over is de negatieve key factor in dit verhaal. 5.1.2e stelt dat beste bonus de Free bonus is, die niet vrijgespeeld hoeft te worden.
- 5.1.2e stelt dat bij veel sites de inschrijving niet te veel vergt (bijv. slechts nr. van ID-bewijs). Pas later bij het maken van de eerste deposit (dus wanneer speler al de moeite heeft gedaan om in te schrijven) vragen naar verdere verificatie van ID. Dit ter voorkoming dat inschrijving te lang duurt en de speler afhaakt.



Ministerie van Veiligheid en Justitie

Technical Standards for Remote Gambling

Workshop
14 January 2014



Introduction

